IKI INTERNATIONAL CLIMATE INITIATIVE

Independent Complaint Mechanism

Compliance Appraisal

Projects: 11_I_044, 11_I_191, 12_I_045
Case number: 2025-01
Date: 20.10.2025

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1 INTRODUCTION

The Independent Complaint Mechanism (ICM) of the International Climate Initiative (IKI) was established to enable people who suffer (potential) negative social and/or environmental consequences from IKI projects, or who wish to report the improper use of funds, to voice their complaints and seek redress. The ICM Policy[1] dated 1 February 2022 sets out how the ICM deals with complaints from a person who may be/may have been negatively impacted by or during the course of an IKI project and/or would like to report significant adverse environmental impacts caused directly by the IKI project and/or that would like to provide evidence of economic crime or violations of budgetary or grant law by or in the course of an IKI project.

2 COMPLAINT AND PROCEDURAL HISTORY

On 3 January 2025, the ICM received a complaint in German regarding the NOOR solar power plant complex near Ouarzazate in Morocco. The complaint expressed considerable concerns regarding the sustainability of the power plant's operation, particularly regarding the project's water requirements, which are provided from the El Mansour Eddahbi reservoir.[2] The complaint alleged significant negative impacts on the local population. In addition to the allegations concerning its water use, the complaint also referred to articles in local media from 2019 and 2021, which criticise irregularities in the allocation of land as well as unfulfilled promises regarding social projects and job effects.

The ICM acknowledged receipt of the complaint on 10 January 2025.

As part of its eligibility determination, the ICM analysed whether the complaint is directly related to an IKI project. The ICM found that the solar power plant complex was directly supported by at least two – possibly three – IKI projects (see Appendix 1). The respective projects have been fully implemented since the end of 2019. The ICM verified with the project managers responsible that there are currently no follow-up projects.

On 27 February 2025, the ICM issued an eligibility statement in which it determined that the complaint was ineligible because the projects funded by IKI had been concluded in December 2019 and complaint had been filed after the lapse of three years as set out in the ICM policy, and therefore out of time. Nevertheless, the ICM decided to proceed with the complaint exercising its discretionary proprio suo moto powers (Section 5 of ICM Policy). The reason for proceeding with this complaint *proprio suo moto* was that the ICM had “obtained prima facie evidence that the solar complex’s water consumption potentially may be contributing to negative impacts on the communities relying on the El Mansour Eddahbi reservoir” and that the “potential harm to those communities is not insignificant.”[3] ICM Panel member Philipp Koenig recused himself from this complaint.

Subsequently, the ICM contacted the Implementing Organization (IO) for the main two projects, namely KfW as well as the IKI project managers to explore the possibility of undertaking a dispute resolution process. Given the sensitivity of these projects in Morocco, the ICM requested the IO to arrange meetings with the two Moroccan agencies that were responsible for implementing the projects and managing the reservoir on the ground so as to explore the possibility of the agencies leading a dispute resolution process. The water allocation issues

[1] Available at: https://www.international-climateinitiative.com/fileadmin/iki/Dokumente/Beschwerdemechanismus/IKI_ICM_policy_EN_202202.pdf.

[2] An ex-post evaluation by KfW Development Bank of the NOOR I Ouarzazate sub-project (NOORo I) also found: "*The loss of water in the Mansour Eddhabi reservoir, where the water for cooling NOORo I is collected, has increased massively in recent years*."

[3] Eligibility statement.

involved in the complaint relate to the use of water from the El Mansour Eddahbi reservoir, among others. The solar power project, while using some of that water for its purposes, is not the major consumer. Rather agricultural activities and other industries use the water as well. In these circumstances, it did not appear either feasible or practical to conduct a successful dispute resolution process that was confined to the funded solar projects alone. Such a process was unlikely to address the broader climate change impacts on the reservoir and the water allocation issues involved in this case.

The ICM corresponded with the Implementing Organization seeking its help and declaring the ICM's readiness to support efforts by the Implementing Organization to resolve the issues. There were also a few meetings between the staff of the Implementing Organization and the ICM office in which the ICM processes were clarified. These did not yield tangible outcomes. Thereafter, the ICM decided to refer this case to compliance review. Following that decision, IKI and BMU were requested to provide a formal response to the complaint. The ICM was informed that no further input would be provided by IKI and BMU beyond what had already been provided to the ICM during the eligibility stage. Accordingly, the ICM decided to conduct this compliance appraisal as required by section 4.2.3 (e) – (g) of the ICM policy to determine if the ICM should conduct a full compliance investigation.

3 COMPLIANCE APPRAISAL

In a compliance appraisal under section 4.2.3 (e), the ICM is required to examine "whether there is strong evidence prima facie to suggest that the complainant is affected by adverse impacts from an IKI-funded project due to non-compliance with applicable BMU/IKI standards and policies. (emphasis added).

In examining the available evidence, the ICM finds that one of the several solar plants in the NOOR solar power plant complex near Ouarzazate in Morocco, uses water from the El Mansour Eddahbi reservoir for its purposes. The other solar plants in the NOOR solar power plant complex use air for its purposes and therefore do not significantly draw on water from the said reservoir. The ICM panel also finds that the reservoir supplies water to agriculturalists and other industrial ventures in the region. There is evidence to suggest that climate change has adversely impacted the water inflow to the reservoir and may have also increased evaporation and other water losses from the reservoir. There was a further study that was to be undertaken in 2023 and the need for further assessment of water use from the said reservoir viz the NOOR power plant had been recognized by the IO in 2022. The ICM is unaware whether these studies were done and if so what their results and findings were.

The quantity of water drawn from the NOOR solar power plant from the reservoir is relatively a smaller percentage in comparison to the other uses supplied by the reservoir. Climate change has and will impact all these uses. If a compliance review is undertaken of the IKI funded NOOR power plant, remedial action may be suggested (if non-compliance is found) to shift the plant to air cleaning (if technically feasible) or to further improve water use efficiency at the power plant to reduce water consumption. Even then, the broader issues arising from the impacts of climate change on the reservoir and the adverse impact on downstream water uses are unlikely to be satisfactorily remedied. In the view of the ICM, the only way to effectively address and find solutions for the overall impact of climate change on the reservoir and the competing water uses from it, is for the government agencies to convene a broad-based stakeholder roundtable. In such a broad-based dialogue process, the reduced receipt of water by the reservoir and the increase in water losses due to evaporation and other reasons such as climate change, could be assessed and competing water uses balanced in an equitable and fair manner that would bring about sustainable long term solutions to the issues at hand. The various lenders could consider assisting the Moroccan government agencies in this endeavor, e.g. by providing technical and financial resources to such process.

The ICM therefore concludes that there is insufficient prima facie evidence to suggest that stakeholders, such as agriculturalists and residential uses of water from the reservoir are adversely impacted by the NOOR power plant alone funded by IKI through non-compliance with IKI safeguards. Rather the impacts suffered by these stakeholders is the result of complex natural processes likely triggered (at least in part) by climate change, and affect all stakeholders, including the NOOR power plant complex and the other stakeholders such as agriculturalists and residential users. Neither a narrowly constituted dispute resolution process confined to the IKI-funded Noor power plant, nor a compliance review undertaken by the ICM will help satisfactorily address the broader water use issues and climate change impacts on the reservoir. Only a broad based transparent and participatory stakeholder dialogue process lead by the Moroccan government agencies involved, can develop such long term sustainable solutions for the issues at hand.

For these reasons, the ICM has decided not to proceed with a compliance investigation and to close this complaint.

4 COMPLIANCE APPRAISAL DECISION

Considering the information available and the discussion above, the ICM concludes that there is insufficient prima facie evidence to suggest that the virtual complainants (water use stakeholders) are affected by adverse impacts from an IKI-funded project alone due to non-compliance with applicable BMU/IKI standards and policies. Even if they were so affected, a compliance process is unlikely to remedy the impacts suffered by them.

This proceeding will now be closed.

Issued by the ICM Independent Expert Panel

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Appendix 1: List of IKI projects

	Project	Implementing organisation	Link	Duration
11_I_044	New solar thermal power plant in Ouarzazate under Moroccan solar plan.[4]	Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH	https://www.international-climatehttps://www.international-climate-initiative.com/en/project/new-solar-thermal-power-plant-in-ouarzazate-under-moroccan-solar-plan-11-i-044-mar-g-marokkanischer-solarplan-i-dkti/initiative.com/en/project/new-solarhttps://www.international-climate-initiative.com/en/project/new-solar-thermal-power-plant-in-ouarzazate-under-moroccan-solar-plan-11-i-044-mar-g-marokkanischer-solarplan-i-dkti/thermal-power-plant-in-ouarzazatehttps://www.international-climate-initiative.com/en/project/new-solar-thermal-power-plant-in-ouarzazate-under-moroccan-solar-plan-11-i-044-mar-g-marokkanischer-solarplan-i-dkti/under-moroccan-solar-plan-11-i-044-marhttps://www.international-climate-initiative.com/en/project/new-solar-thermal-power-plant-in-ouarzazate-	10/2013-12/2018

[4] Counter to its name, the project rather supported the national solar strategy according to ZUG project management. At this stage, the question whether the project indirectly or directly supported the solar complex can remain unanswered because two IKI projects undoubtedly supported the solar complex.

			under-moroccan-solar-plan-11-i-044-mar-g-marokkanischer-solarplan-i-dkti/g-marokkanischer-solarplan-i-dkti/	
11_I_191	Solar Power Plant Ouarzazate Morocco.[5]	KfW Development Bank	https://www.international-climatehttps://www.international-climate-initiative.com/en/project/solar-power-plant-ouarzazate-morocco-11-i-191-mar-k-ouarzazate/initiative.com/en/project/solar-powerhttps://www.international-climate-initiative.com/en/project/solar-power-plant-ouarzazate-morocco-11-i-191-mar-k-ouarzazate/plant-ouarzazate-morocco-11-i-191-marhttps://www.international-climate-initiative.com/en/project/solar-power-plant-ouarzazate-morocco-11-i-191-mar-k-ouarzazate/k-ouarzazate/	01/2012-12/2017
12_I_045	Solar thermal power plant in Ouarzazate under Moroccan Solar Plan.[6]	KfW Development Bank	https://www.international-climatehttps://www.international-climate-initiative.com/en/project/solar-thermal-power-plant-in-ouarzazate-under-moroccan-solar-plan-12-i-045-mar-k-marokkanischer-solarplan-i-ii-dkti/initiative.com/en/project/solar-thermalhttps://www.international-climate-initiative.com/en/project/solar-thermal-	08/2014-12/2019

[5] The project partially financed Noor I.

[6] The project partially financed Noor III.

			power-plant-in-ouarzazate-under-moroccan-solar-plan-12-i-045-mar-k-marokkanischer-solarplan-i-ii-dkti/power-plant-in-ouarzazate-underhttps://www.international-climate-initiative.com/en/project/solar-thermal-power-plant-in-ouarzazate-under-moroccan-solar-plan-12-i-045-mar-k-marokkanischer-solarplan-i-ii-dkti/moroccan-solar-plan-12-i-045-mar-khttps://www.international-climate-initiative.com/en/project/solar-thermal-power-plant-in-ouarzazate-under-moroccan-solar-plan-12-i-045-mar-k-marokkanischer-solarplan-i-ii-dkti/marokkanischer-solarplan-i-ii-dkti/	