

GRIEVANCE REDRESS MECHANISM (GRM)

1. Objectives of GRM

The ADB's SPS states of the following:

"The borrower/client will establish a mechanism to receive and facilitate the resolution of affected persons concerns and grievances about social, environmental, or other project-related grievances. The grievance redress mechanism should be scaled to the risks and adverse impacts of the project. It should address affected persons' and other stakeholders' concerns and complaints promptly, using an understandable and transparent process that is gender responsive, culturally appropriate, and readily accessible to the affected persons at no costs and without retribution. The mechanism should not impede access to the country's judicial or administrative remedies. The borrower/client will inform affected persons about the mechanism." Accordingly, the project is required to have a platform for the affected people to submit their grievances and resolve them, which is focused on social and environmental aspects. GRM provides a predictable, transparent and credible process to all parties, resulting in an outcome that is seen as fair, effective and lasting. Accordingly, GRM is appointed to take necessary steps to harmonize project activities as well as the wellbeing of the general public.

2. Standard Operating Procedure for GRM

The Project Management Unit (PMU) will institutionalize a GRM to effectively address any grievances that may arise during project preparation, implementation and operation. The project will adopt a three tier GRM for implementation in the project. A GRM will receive, evaluate, and facilitate the resolution of social, environmental, or other project-related grievances. The GRM will aim to provide a time-bound and transparent mechanism to voice and resolve social and environmental concerns linked to the project.

The grievance redress process and timeframe involved in the GRM is described below:

First-tier: The Environment Officer of PMU will receive and resolve within 7 working days if there are complaints before commencement of the construction. If any grievances before the start of the construction are not resolved by the Environment Officer, the grievances shall be submitted to GRC for deliberation. The project contractor will receive and resolve within 7 working days for any construction related grievances. If grievances are not related to the construction activities, the complainant(s) can submit the grievance to the Environment Officer, who will submit this to the PMU.

Second-tier: If the complainant(s) is not satisfied with the decision or response he/she receives from the Contractor within 7 days of submitting the grievance, the complainant can submit his appeal to the Environment Officer, who will be the member secretary for the GRC committee at the Project Management Unit (PMU). The PMU, under the leadership of the Dy. Project Director, will be responsible for receiving complaints, reviewing them in coordination with the Grievance Redress Committee and ensuring their resolution within a maximum of 15 working days.

Third tier: For grievances that remain unresolved and require intervention at a higher level, the matter will be escalated to the Project Director at the 3rd level and the resolution will take a maximum of 10 working days.

Despite the project's GRM, an aggrieved person shall have access to the country's legal system at any stage. This access can run parallel to the GRM process and is not dependent on its outcome.

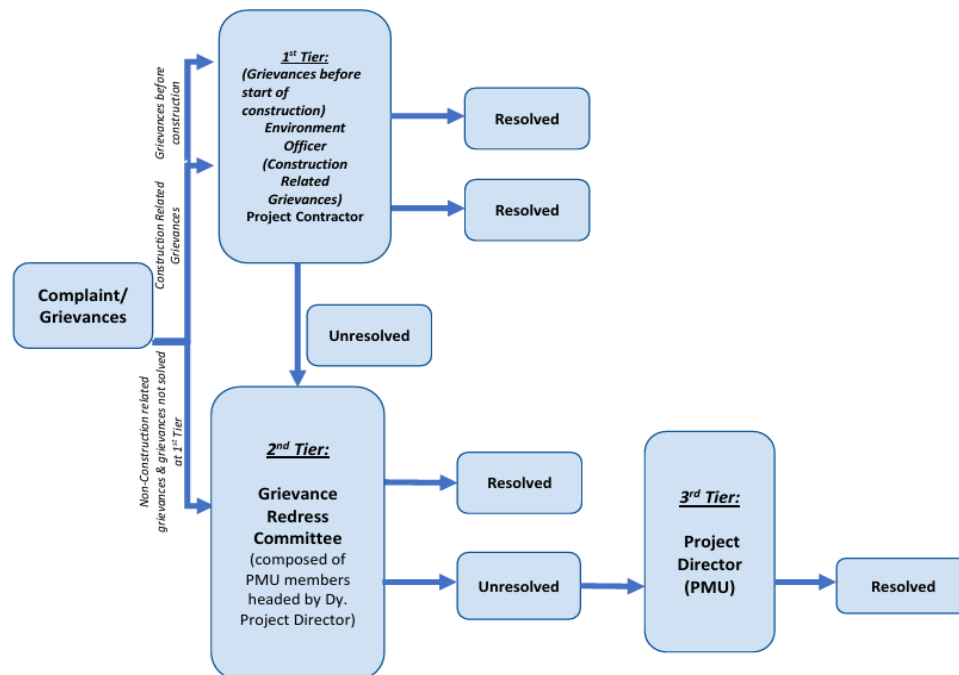


Figure 1: GRM structure for the Climate Resilient Omchhu River Basin Project

2.1 Composition

A Grievance Redress Committee (GRC) will be established at the PMU Office in Phuentsholing Thromde, comprising selected members from the PMU. The Deputy Project Director of PMU will serve as the Chairperson of the GRC, with the Environment Officer acting as the Member Secretary.

The GRC, as detailed in Table 1, will be responsible for reviewing and recording all grievances related to the project. Each submission will be documented both in logbook and in excel database with the complainant's name, contacts (except in anonymous cases), the date of submission, GRM level, the nature or subject of grievance, safeguard classification (social or environmental), status of the complaint (under the review, open/pending, closed etc.), outcome (accepted, partially accepted, rejected), resolution date. Only project-related complaints will be accepted and reviewed, including anonymous complaints.

The GRC will convene regular quarterly meetings with all members and may call special meetings as needed when grievances are received. It will review each case, identify appropriate resolutions, and engage relevant parties (including experts focused on specialized spheres) in the resolution process. Meetings addressing specific grievances must include the individual who submitted the complaint, except in cases of anonymous complaints. Grievances will be addressed within a maximum of 15 working days, although more complex cases may require additional time depending on their nature and severity. Depending on the degree of the case, an additional time may be agreed with the complainant submitting the written notification to her/his about the extended timeline in advance to resolve the grievances.

Table 1: Composition of the GRC (Grievance Redress Committee)

Position	Name	Remarks
Deputy Project Director (PMU)		Chairperson
Environment Officer (PMU)		Member Secretary
Project Manager (PMU)		Member
Admin Officer (PMU)		Member
Project Engineer (PMU)		Member
Legal Officer (PMU)		Member
Contractor (Project Manager)		Member
Local Government Leader (Tshogpa / Councilor)	-	Members are on a call basis based on the nature of grievance representing the relevant agency. This concerned agency will nominate the officials to represent their office during the time of grievances.
Representative from Dungkha Administration	-	
Representative from reputable community-based organization	-	

2.2 Information Dissemination Methods

The GRM will be widely publicized to ensure public awareness. Information about the GRM will be disseminated through social media platforms, published on the Phuentsholing Thromde website (pcc.bt) and communicated via local government representatives (Tshogpas/Councilors). The public will have several mechanisms for lodging a complaint:

- a) *Email Submission*: Email IDs of GRC members will be available on Phuentsholing Thromde website (PMU) and all other GRM information boards for receiving and responding to complaints.
- b) *Mobile phone/messaging apps*: A dedicated GRM number will be provided on Phuentsholing Thromde website (PMU) and all other GRM information boards/leaflets.
- c) *Walk-in submission*: A physical complaint box or counter at the Phuentsholing Thromde office & project sites.
- d) *Through Tshogpas/Councilors*: Local leaders can collect complaints from their communities and submit them to the GRC.

At any time, an aggrieved person can convey his/her complaint, name and contact details by e-mail, letter or in person using designated means. All grievances received will be recorded and will be screened for the project relevancy by the committee. The project related grievances received and responses provided will also be documented and reported back to the affected persons. The number of grievances recorded and resolved and the outcomes will be displayed/disclosed in the PMU office, as well as reported in the semi-annual safeguard monitoring reports to be submitted to ADB.

The grievance Drop Box/complaint box will have a proper signboard with names and numbers of contact persons at all these locations.

3. Grievance Redress Committee – Information Process

The broad outline of the GRC mechanism and flow of information is given below:

- a. The Environment Officer will check the grievance redress boxes weekly and communicate any received grievance to the GRC.
- b. Each complaint/grievance will be issued a reference number. The Environment Officer will issue each aggrieved person acknowledging that the grievance has been complaint and details on the process to follow.
- c. The GRC will work with aggrieved persons to resolve the complaint/grievance. On settlement of the complaint, the Environment Officer will verify that the complaint is addressed (through consultation with the affected parties) and issue a letter to the aggrieved person citing the findings of the GRM investigation and any action taken with regard to the complaint.

- d. The decision on the grievance must be communicated to the aggrieved person by the GRC within a maximum timeframe of 15 days with appropriate action taken for resolution of the issue.
- e. All grievances will be documented and indexed. The meeting proceedings and actions against each of the grievances will be documented by the Environment Officer.
- f. If grievance requires a policy decision or remains unresolved at GRC level chaired by the Dy. Project Director, the case will be forwarded to Project Director for further resolution which will be resolved within 10 days.

All complaints lodged with the GRC will be recorded in a proper GRC register at the Phuentsholing Thromde office. All details of the grievance and the complaint should be captured in the register. This shall also be reported to ADB within the semi-annual safeguard report. Details of the nature of complaint, status of complaint, and outcome will be included within the safeguard report. ADB's Independent Environmental Specialist will undertake routine inspections of the GRM to ensure that the GRM is functioning.

The identity of the aggrieved parties will be maintained in full confidentiality as necessary. The information provided in the GRM box will be made accessible only to the GRC focal person.

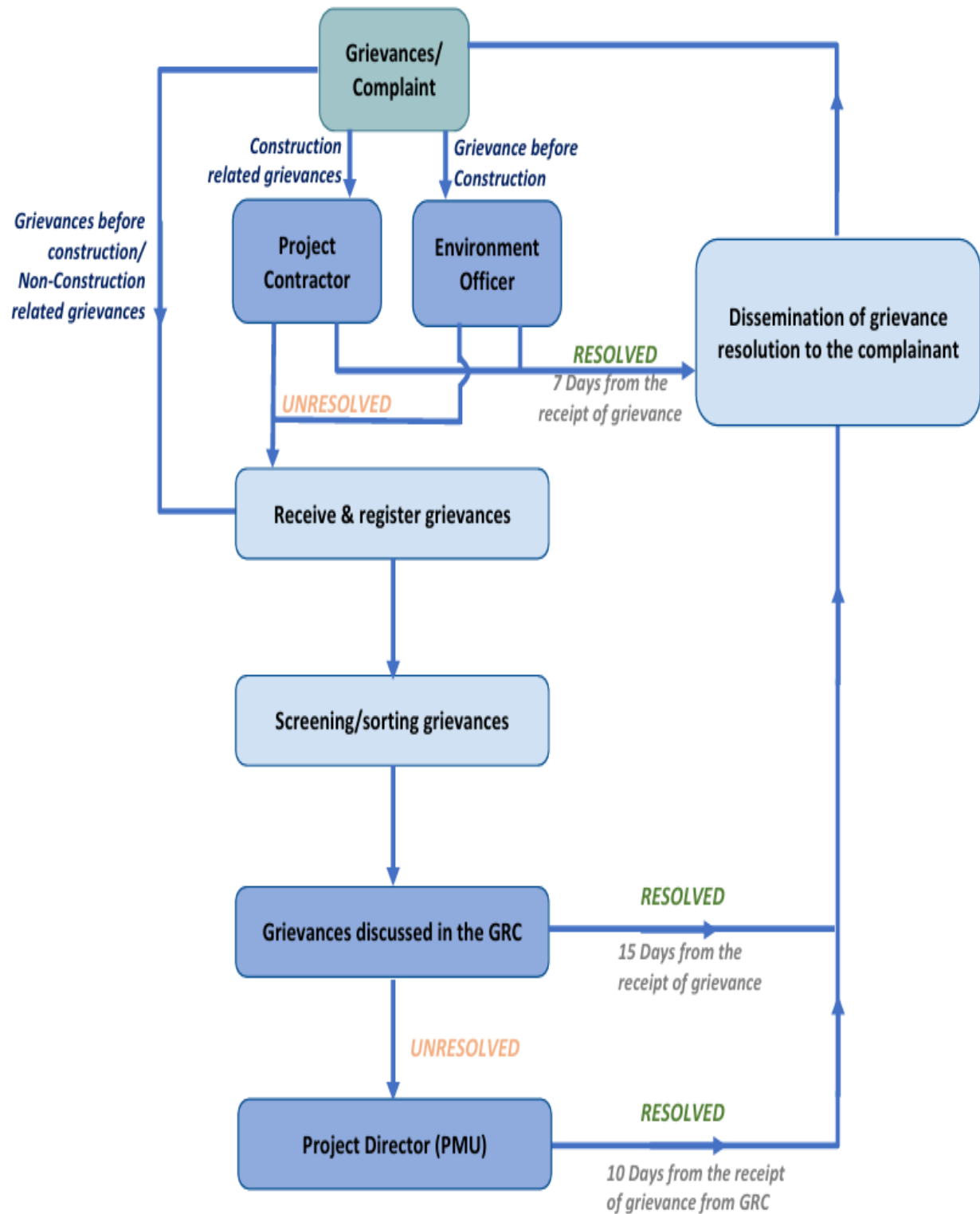


Figure 2: GRM standard operating procedure for the Climate Resilient Omchhu River Basin Project

3.1 Cost

All costs involved in resolving the complaints (meetings, consultations, involvement of the required experts, communication and reporting/information dissemination) will be borne by the PMU through provisional sum of the contract document. However, the cost of implementation of the resolutions provided by the GRM shall be borne by the contractor if it is their fault and responsibility. If the issues are beyond the contractor's responsibility, the matter shall be decided by the PMU.

Phuentsholing Thromde: Climate Resilient Omchhu River Basin Project **ENVIRONMENTAL AND SOCIAL GRIEVANCE FORM**

Complainant Name	
Contact Details	Address: Contact No.:
Location of Complaint	
Details of Complaints	
Directions	
Confidentially Requested	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Signature of the Complainant	Date:
<i>Reference No.:</i>	<i>For official use only</i>
<i>Date Received:</i>	<i>For official use only</i>
<i>Complaint taken by:</i>	<i>For official use only</i>
<i>Complaint assigned:</i>	<i>For official use only</i>
<i>Date of complaint Acknowledged:</i>	<i>For official use only</i>
<i>Complaint referred to</i>	<i>For official use only</i>

Format for Grievance Redress Mechanism Register:

Sl. No	Name of the Complainant	Unique Complaint Number	Address & Contact No.	Grievance Category (Environmental, Social, Compensation-related)	Gist of the Complaint	Forwarded to Whom	Whether Grievance Redressed or not	If yes, Gist of Disposal	If Rejected, Gist of Reasons	If not attended, Reasons

Monthly status Report on Environmental and Social Grievance Redress

Sl. No	Name of the Unit	No. of Pending Complaints at the end of Previous Month	No. of Complaint received during the Month	Action Initiated during the Month	Completed during the Month	No. of Complaints Pending at end of Month	No. of Grievance Redressed	No. of Dismissal	Total	Remarks