

Stakeholder feedback and Grievance redress mechanism.

Chapter I. Introduction

- 1.1 The overall goal of TRTP is to reduce poverty and curb outmigration from rural areas through the enhancement of smallholder resilience to climate change. The development objective of the project is to enable the rural poor (especially youth, women and smallholders) to increase their productive capacity, resilience to economic, environmental and climate-related risks and access to markets.
- 1.2. The primary target group is commercially oriented smallholder farmers and youth entrepreneurs cultivating up to 10 hectares. TRTP will also focus on enabling youth entrepreneurs, women and men from rural areas to access finances and business development support to establish and expand their on- and off-farm businesses. Forty per cent of the beneficiaries will be women and 40 per cent will be youth. As the project is national in scope, the geographical targeting does not limit project interventions to a specific geographical area, but prioritizes interventions in the more climate-vulnerable and deprived areas of the country.
- 1.3. The forthcoming document describes the project's efforts for beneficiary feedback and outlines its grievance redress mechanisms in line with IFAD guidelines and regulations. Complaints¹ and grievances can be submitted through a GRM when resolutions are not found at project level through existing approaches ensuring access and equity to project activities (e.g., participatory approaches, targeting and feedback forms etc.)

1.4. Ensuring access and equity to project activities during project implementation.

- 1.4.1. The project will take a number of transparent steps that will help ensure that the benefits of the project are being distributed fairly with no discrimination nor favoritism. Primarily, project targeting has been agreed with the government and comprises targeting criteria based on gender and age quotas, but also on geographical targeting based on a climate vulnerability assessment made by the project in terms of publicly available precipitation records as well as publicly available poverty and 'deprivation' records compiled by the government. These areas will be the project's primary geographical areas that the project will focus on.
- 1.4.2. The project will advertise broadly through the mass media (radio, social media, town hall meetings, workshops etc.) for the implementation of an outreach/mobilization strategy that will target these geographic areas on a first come, first serve basis. Beneficiaries will be explained as they have been throughout the participatory and gender-balanced consultations during the design, that this is a project with a strong focus on women and youth, but that also adult men will also be eligible to provided that they are from the targeted geographical areas and that they own and cultivate no more than 10 ha of arable land.

¹ A complaint – any request, notification of proposal addressed to CPIU IFAD, based on the eligibility criteria mentioned in this guide

1.4.3. The Service Provider will also be selected as will the beneficiaries, based on clear selection criteria designed to get the SP with the most relevant experience and for the latter to ensure the project is reaching the desired target communities.

Chapter II. Grievance and Redress Mechanism (GRM)

2.1. IFAD-supported projects and programmes are designed in a participatory process thus taking into account the concerns of all stakeholders. IFAD works to ensure that all IFAD investments are implemented in accordance with the Fund's policies, standards and safeguards. IFAD considers it equally important that parties adversely or potentially adversely affected by IFAD-supported projects and programmes should be able to bring issues to the Fund's attention. Annex A describes the project level GRM to be put in place.

2.2. IFAD's Grievance Redress Mechanism (GRM) can be accessed when necessary to manage project-related grievances that cannot be resolved by the project's Executing Entity through its regular interventions ensuring access and equity. The purpose of the GRM is to provide a complaints procedure for alleged non-compliance with IFADs social and environmental policies and mandatory aspects of IFAD's Social, Environmental and Climate Assessment Procedures (SECAP). Eligibility criteria are included in box 1 below of Annex A.

2.3. Complaints needs to be captured at a project level grievance database (e.g., Name, address, telephone number and other contact information; whether the complainants wish to keep their identity confidential; name of the IFAD project/programme). The grievance database should comprehensively account for key steps undertaken as part of the process of complaint intake (including recording date received and assignment of a tracking number), eligibility review, referral, investigation, response, redress, and final follow-up with the complainant on their satisfaction with the remediation. If complainants request confidentiality with regard to their identities, and/or the details of complaints and responses, GRMs should honor those requests, while still making basic information about the complaint publicly available. The database should allow for public reporting on metrics such as number of eligible complaints received, number and percentage of complaints resolved, number and percentage of complaints resolved within a specified timeframe, and number and percentage of complaints that have been resolved through direct and relatively straightforward actions (e.g. small correction of a project activity, making information more accessible in a community) and / or other complex cases that have gone to mediation (third party monitoring) or have been referred to a third party.

2.4 The project's grievance redress data and reporting should also feed into IFAD project supervision and implementation support processes. In this context, the IFAD supervision team will draw on reports prepared by the CPIU IFAD and by third party monitors if available, and will carry out further analyses through site visits and consultations with target groups to validate findings. Performance/implementation issues will be discussed with relevant government counterparts to agree on specific remedial actions and any follow-up

implementation support to be provided by IFAD. For projects at advanced stages of implementation, focus should also be placed on compiling and disseminating best practices and lessons learned

2.5 IFAD's Complaints Procedure aims to serve as an accountability mechanism with a clear entry point and transparent process for people and communities to raise concerns with IFAD-supported projects and to provide effective sustainable solutions. Its mandate is to:

- a) facilitate the resolution of complaints from people who may be affected by projects or subprojects in a manner that is fair, objective and constructive;
- b) enhance the environmental and social outcomes of projects; and
- c) foster public accountability and learning to enhance the environmental and social performance of IFAD and reduce the risk of harm to people and the environment.

The Procedure is organized in two complementary functions:

- a. Problem solving function: to help resolve issues raised about the environmental and/or social impacts of project through a neutral, collaborative, problem-solving approach and contribute to improved social and environmental outcomes of the project.
- b. Impartial review function: to carry out reviews of IFAD's compliance with its SECAP and other related policies, assess harm done, and recommend remedial actions where appropriate.

Annex: A. Project-level GRM

1. The project team will establish communication channels at field level to file complaints. Contact information (including contact postal code, phone number and/or email) and information on the process to file a complaint will be disclosed in all meetings, workshops and other related events throughout the life of the project. The project will include in the capacity building program information on the GRM and will organize discussions to determine the most suitable way for beneficiaries and stakeholders to communicate their concerns and ideas.
2. Complaints can be raised directly to the Service Provider (that will record the complaint in line with this GRM), PFI and CPIU representatives. Filed teams or other project representatives from the above-mentioned parties should inform the complainant on the minimum requirements that the complaint should include:
 - 2.1. Name and contact details (domicile/seat address or electronic address, if it addressed electronically) of the person(s) (and/or their representative) or community affected by TRTP;
 - 2.2. Name of the Public Authority that is addressed (e.g., CPIU IFAD);
 - 2.3. Clear statement of TRTP adverse impact(s) (object of the complaint and motivation). This includes direct and material harm which can be actual present harm, or harm that is expected in the future;
 - 2.4. Whether the complainants wish to keep their identity confidential.
 - 2.5. Signature of the complainant or of the representative (including the POA)
 - 2.6. Other documents the complainant considers relevant to the case/complaint, if necessary.

3. Grievance Escalation Procedure

Level 1

Submitted complaints will be sent to the Project Director (at the CPIU) and M&E Specialist, KM Consultant, Gender Consultant, Legal Consultant to assess whether the complaint is eligible. A complaint needs to be acknowledged within 2 days in the form of a letter or email. The eligibility criteria are included in box 1 below. Project Director (at the CPIU) will inform and incorporate other colleagues (e.g., Agribusiness specialist), as required and form a team to assess the eligibility of the complaint.

If the complaint is eligible, a determination will need to be made as to whether the complaint can be resolved directly through a relatively simple action; or whether the grievance is complex enough that it requires additional assessment and/or action by other parties.

Eligible complaints will be addressed by the implementing entity at field level (e.g., the service provider) who is closest to the submitting entity. The institution handling the complaint is responsible for communicating the proposed resolution back to the complainant in a timely fashion according to the Moldovan legislation in force (30 days), in writing or orally if that is a more effective means of communication (e.g., by phone or in a meeting) using language that is easily accessible to

the complainant. The response should include a clear explanation of why the resolution is being proposed; what the proposed resolution would be; and what the complainant's choices are, given the proposed resolution.

When there is agreement by the complainant to the resolution, then minutes will be drafted and signed by the parties involved. After due implementation of it, new minutes will be drafted and signed stating that the complaint has been resolved to the complainant's satisfaction.

Where an agreement has not been reached, the complainant should be offered an appeals process.

The Project Director (at the CPIU) and M&E Specialist, KM Consultant, Gender Consultant, Legal Consultant will be responsible for recording the grievance, how it has been addressed and if a resolution was agreed.

Level 2

When an aggrieved party is not satisfied with the resolution proposed through level one consultations the community level institution, they can seek recourse through formal government grievance redress processes, e.g., a district (or higher level) grievance authority. An aggrieved party may decide to directly take the formal route if they believe their grievance will not be addressed in a fair, impartial and transparent manner, or without reprisal, at level 1. When received complaints are not solved at level 1, this needs to be registered by the CPIU. The Project Steering Committee should be made aware of the complaint and the subsequent process followed.

Level 3

If the complaint has not been solved in level 2, the complaint must be submitted to IFAD by downloading the complaint form (<https://www.ifad.org/documents/38711624/40169860/IFAD+Complaints+Submission+Form+Final+Draft+%28Downloadable%29.docx/52c75cad-439f-4e4a-8a70-45056ebde826>) and sending an email to SECAPcomplaints@ifad.org or a mail to:

IFAD
SECAP Complaints (PMD)
Via Paolo di Dono 44
00142 Rome, Italy

The full complaint procedure at IFAD is stipulated in the sections below.

Complaints can be submitted in any language by letter, e-mail and/or web form (available on IFAD's website). Any communication thereafter will be in English with a translation into Romanian. Processing of complaints not submitted in English may require additional time due to the need for translation. IFAD will timely notify the complainant of any delays caused by translation.

When a complaint is received, IFAD will first assess its admissibility. For complaints to be considered, the following eligibility criteria in box 1 will be met.

Box 1: eligibility criteria.

1. The complainant alleges that IFAD has failed to implement its social and environmental policies and/or the mandatory provisions set out in SECAP (<https://www.ifad.org/en/accountability-and-complaints-procedures>);
2. The complainant alleges that they have been or will be adversely affected or harmed (direct or material) as a result of such non-compliance;
3. Complaints must be put forward by **every individual or group** who are both nationals of the country concerned and/or living in the TRTP project area. Complaints from foreign locations or anonymous complaints will not be taken into account.

The following complaints will **not be considered eligible under this GRM**:

- Matters not related to IFAD's actions or omissions in designing or implementing TRTP;
- Matters already considered by IFAD's Complaints Procedure, unless complainants have new evidence previously not available to them and unless the subsequent complaint can be readily consolidated with the earlier complaint;
- Submissions from foreign entities or anonymous;
- Matters related to procurement of goods, services and consulting services;
- Accusations of fraudulent or corrupt activities in relation to project implementation – these are dealt with
- Allegations of fraud and corruption in IFAD-supported projects – these are dealt with by IFAD's Office of Audit and Oversight.
- Matters that are frivolous, malicious, trivial, or generated to gain competitive advantage.

Allegations of sexual harassment, exploitation and abuse are dealt with through IFAD's existing policy to preventing and responding to sexual harassment, sexual exploitation and abuse, and are forwarded to IFAD's Ethics Office.

4. Retaliation

The key principle underlying IFAD's Complaint Mechanism is that **every individual or group** has the right to voice their criticism or file a complaint with relation to an IFAD-supported project without threats to their safety or fear of retaliation. IFAD expects its partners not to prevent or harm stakeholders who may (or have) criticised(d) an IFAD-supported project or filed a complaint.

According to IFAD's Whistle Blower Protection Procedures, any retaliatory behaviour by IFAD personnel against an external party engaged in any dealings with IFAD because such person has

reported unsatisfactory conduct and/or misconduct will be considered unsatisfactory conduct or misconduct.

During the project design and implementation process IFAD will inform stakeholders of its SECAP as well as of the Complaints Procedures in force. To this end, IFAD will ensure that stakeholders are aware that they can contact IFAD directly and file a complaint if they believe that they are, or will be, adversely affected by TRTP and that the SEPMU and/or CEP is/are not responsive to their concerns.

Hence, complainants can go directly to level 3 and send his/her complaint to IFAD if they fear retaliation from the executing agency (ies).

5. Receipt and Registration of Complaint

After receipt of a complaint, the SECAP Redress Service (SRS in IFAD will ensure that an acknowledgement of receipt is sent to the complainant(s) within five business days. Complaints submitted in another language than English, may require additional time for translation. The acknowledgement informs the complainant(s) the date by which IFAD will determine the eligibility of the complaint, and whether additional information is required.

Upon receipt, the SRS will verify whether the complaint is known and/or already being processed by the project-level grievance redress mechanism. If not, the SRS decides within 21 business days after the acknowledgement of receipt on the eligibility of the complaint, based on the criteria defined above. During this phase, further information may be requested from the complainant and/or the regional division to clarify the complaint. In case of partial or total ineligibility, the SRS will, if possible, advise the complainant on which alternative measures could be taken and/or to which institution the concerns may be addressed. In the case of full eligibility, the complainant will receive a notice with information on the next steps, and the complaint will be registered.

The SRS will also notify the following internal stakeholders regarding receipt of the complaint: the Country Director and other relevant staff including the Regional Director, Director Environmental, Climate, Gender and Social Inclusion Division (ECG), Director Sustainable Production, Markets and Institutions Division (PMI), Director Operational Policy and Results Division (OPR), Office of the General Council (LEG), Communications Division (COM), Office of Enterprise risk Management (RMO) and others as appropriate.

6. Assessment of Complaint

Once a complaint is deemed eligible and registered as such, the SRS will initiate the assessment process. During this phase, the SRS will set up a review group consisting of the Country Director, ECG representative, PMI representative and a LEG representative to carry out an assessment of the complaint to:

- Develop a thorough understanding of the issues and concerns raised;

- Engage with the Project Delivery Team (PDT);
- Engage with the complainant, the Borrower and the CPIU;
- Identify local communities and additional stakeholders as relevant;
- Explain the different functions of the Procedure, their scope and possible outcomes to the parties involved; and
- Determine whether the parties seek to initiate a problem-solving process or impartial review.

The assessment process is used to give the complainant(s), the Borrower, and the PDT an opportunity to ask questions and consult with the SRS to facilitate informed decision making and understanding of the Procedure. Typical activities during this phase include:

- Review of project related documents;
- Meetings with the complainant(s), Borrower, CPIU staff, and if relevant local government officials, representatives of civil society and other stakeholders;
- Visit to the project site(s); and
- Public meetings in the project area as necessary.

When planning a visit, the SRS will inform all parties upfront of its planning.

At the end of this phase, the Complainant(s) and the Borrower/Recipient/Partner decide whether they would like to proceed with the problem-solving process or an Impartial compliance review. If both parties agree to the problem-solving process, this will be started by the SRS. If there is no agreement, the complaint will be forwarded to the Impartial Review Function.

The assessment should be finalized within maximum 90 calendar days (ninety) business days after the registration of the complaint with an assessment report prepared by the SRS. The report should include:

- Summary of the information gathered and parties' perspectives of the issues raised;
- Decision of the parties to pursue a problem-solving process or compliance review;
- Action plan with timeframe for implementation, including appointment of mediator as relevant;
- Copy of the complaint, anonymized as necessary, as well as any Borrower's response that may be provided.

The report will be shared with all parties. Any comments should be received within 30 calendar days before the report is finalized and published (as necessary on the CPIU website), except the fact when it is pre-trial complaint it shall be received in 15 days.

7. Problem Solving

If the parties agreed to a problem-solving procedure, the SRS will facilitate the process to help resolve issues raised about the environmental and/or social impacts of the project through a neutral, collaborative, problem-solving approach. During the assessment phase, it should have been clarified what problem-solving approach will be followed:

- **Facilitation and information sharing:** in case the complainant(s) raise(s) questions regarding existing or foreseen impacts of a project, the SRS may facilitate the involved parties to obtain the information and clarifications resulting in a resolution.
- **Mediation:** a neutral third party (from Moldova or any other location deemed appropriate) who acts as a mediator (contracted and selected according to CPIU IFD procurement guidelines) may be appointed to assist the parties involved in voluntarily negotiate a mutually satisfying resolution.
- **Fact-finding mission:** the SRS may contract (an) external consultant(s) to conduct a fact-finding mission to examine the issues agreed upon by the parties to reach a common understanding and possible solution.

Engagement in the problem-solving process is in any case a voluntary decision and requires agreement between the complainant and the Borrower. Each party reserves the right to exit at any point in the process.

Any agreement reached following the problem-solving process should be specific in terms of objective, nature and requirements, and documented in written form (to be prepared by the SRS or involved mediator or consultant). The timeline for the process is to be defined in the assessment report, but in any case, the process should not take longer than 2 years. In pursuit of a solution, IFAD will not knowingly support agreements that would coerce one or more parties, be contrary to IFAD policies, or violate the domestic or international laws applicable.

Where an agreement is reached, the SRS will monitor the implementation of the agreement and share interim updates with the parties, IFAD management and on the website (as applicable).

Where there is no or only partial agreement reached, the SRS will verify whether the complainant(s) would like to transfer the case to the Impartial Review Function.

8. Impartial Review Function

In the case no or partial agreement is reached during the problem-solving process, or if decided during the assessment phase, the SRS will forward the case upon agreement of the Complainant(s) to the Impartial Review Function, based in the Office of the President and Vice-President (OPV).

Out of a roster of independent experts, a minimum of two will be contracted to review the complaint and lead the impartial review. The role of these independent experts is to carry out reviews of compliance with IFAD's SECAP and other relevant policies, assess related harm and recommend remedial actions where appropriate. The impartial review will consider issues raised in the complaint or identified during the assessment process, but not those already resolved during the problem-solving process.

The Impartial Review should be finalized within a reasonable timeframe, no later than 2 years. The number of days to finish the review will depend on the complexity of the case (i.e., need for field visit, number of stakeholders involved), as well as the findings and conclusions of the review.

After completion, the independent experts will prepare a final report of their findings and in the case of non-compliance, specific actions to undertake. The report may also contain recommendations for IFAD on how to improve existing policies and/or procedures. After receiving internal comments, the (revised) draft report will be sent to the complainant(s) and the Borrower for fact checking. Comments should be received within 15 business days. The final report will then be prepared for disclosure to IFAD management and the Executive Board within 10 business days. IFAD management will provide a management response to the final report within 10 business days. The final report including the management response will be sent to the complainant(s) and a summary will be published at IFAD's website.

In cases where non-compliances are identified, the SECAP Redress Service will monitor the situation until actions are taken to assure non-compliance(s) are addressed.

9. Reporting and Information Disclosure

All information relevant to the case, including updates on the status and progress of the complaint process, to the extent possible and consistent with IFAD's disclosure policy, is shared with the complainant(s). In addition, IFAD will publish a case registry on its website. The registry will contain the following information in relation to eligible complaints:

- A brief summary of the issues raised
- Date of receipt
- Date of registration
- Project details (name, number, E&S category & climate classification, implementing partner, country, status)
- Information on the status
- Link to available report(s)
- The case registry will also contain information in relation to ineligible complaints, namely:
 - Key issues raised
 - Date of receipt
 - Project details as above
 - Basis for ineligibility

Once a case is closed, IFAD will prepare a summary of the complaint, including follow-up actions and recommendations, taking into account privacy and confidentiality regulations and IFAD's disclosure policy, to be published on its public website. The summary will also be included in IFAD's Annual Report which is published on its website.

10. Resolution

Upon acceptance of a solution by the complainer, a document with the agreement should be signed.