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FEEDBACK AND GRIEVANCE REDRESS MECHANISM

Environmental Health and Pollution Management Project (EHPMP)- Zambia

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Government of the Republic of Zambia, Ministry of
Green Economy and Environment through the Zambia
Environmental Management Agency

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ACRONYMS

AP	Aggrieved Party
CBEs	Community Based Enterprise
CBO	Community Based Organisation
CC	Compensation Committee
CLO	Community Liaison Officer
DDCC	District Development Coordinating Committee
EHPMP	Environmental Health and Pollution Management Project
ESIA	Environmental and Social Impact Assessment
FDI	Foreign Direct Investment
FGRM	Feedback and Grievance Redress Mechanism
GC	Grievance Committee
GIR	Grievance Investigation Report
GRFF	Grievance Redress/Feedback Form
GRS	Grievance Redress Service
MWDSEP	Ministry of Water Development, Sanitation, and Environmental Protection
NDP	National Development Plan
NPC	National Project Coordinator
PDCC	Provincial Development Coordinating Committee
PF	Process Framework
PIU	Project Implementation Unit
WDC	Ward Development Committee
ZEMA	Zambia Environmental Management Agency

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1 Introduction

Most Sub-Saharan African countries experience multiple environmental-health challenges related to inadequate capacity to effectively monitor the use of chemicals, and management of chemical waste. Institutions lack effective regulations and enforcement, producers lack access to clean production and waste management technologies, and the public has no information on environmental-health risks. Nearly 35% of the deaths in sub-Saharan Africa are linked to environmental hazards from toxic chemicals. Diseases caused by pollution were estimated to have caused 9 million premature deaths in 2015, which was 16% of all deaths worldwide and three times more than deaths from AIDS, tuberculosis and malaria combined, and 15 times more than from all wars and other forms of violence.¹

Among the most critical pollution management issues in Sub-Saharan Africa are those related to mercury use in Artisanal and Small-scale Gold Mining (ASGM) sector, e-waste management and the release of UPOPs from open burning of wastes:

- a. **Artisanal and Small-scale Gold Mining (ASGM):** Rising international gold prices are pushing more people to ASGM that is becoming an attractive employment alternative for struggling farmers, poor rural communities, and migrant laborers. For instance, the ASGM workforce in Ghana and Tanzania is estimated at more than 1 million people in each country². In Tanzania the ASGM sector contributes approximately 10% of its gold production. Mercury, a heavy metal highly toxic to humans, is used as an amalgamation agent in ASGM operations with significant health and economic consequences beyond direct health risks to miners and their families. The informal, illegal and unregulated nature of mercury use in such operations has created a legacy of severe adverse (and irreversible) environmental and health damage. Mercury contamination poses potentially serious economic consequences to the lucrative local and regional fisheries with potentially grave

¹ Lancet, 2018; 391: “The Lancet Commission on pollution and health”: 462-512

² UNDP, 2013; World Bank Indicators, 2014

economic consequences due to its bio-accumulation in the food chain³. It is therefore a priority to reduce, and where feasible, eliminate mercury use in artisanal and small-scale gold mining. Institutional capacity to monitor use of mercury as well as its health and environmental consequences is limited. There are ongoing global efforts by donors, multilateral organizations, industrial associations, academia as well as civil society organizations to advance the formalization of ASGM, considering that such an approach will reinforce inclusive growth and sustainable development and promote the sound management of mercury in affected countries.

- b. **Electrical and electronic waste (e-waste):** The global amount of e-waste generated is growing by about two million tonnes every year. It is estimated that the global discarded electronics, in 2021 alone, weighed 57 million tonnes. Out of which less than 20% is collected and recycled. Improper e-waste management contributes significantly to the increasing environmental health risks in sub-Saharan Africa. Over the past 20 years, the market for Information and Communication Technologies (ICT) has grown exponentially and is estimated to be the fastest growing waste stream in the world at 20-50 million tons per year. The issue of e-waste has been migrating to developing countries in both Asia and Africa; countries which typically do not have the resources or infrastructure to manage the high volume of hazardous wastes. Around 80 percent of the e-waste is shipped, often illegally, to developing countries for recycling. Recognizing that e-waste challenge is on the rise and that current policies and practices are insufficient, a growing number of countries are adopting e-waste legislation to address this challenge. E-waste is expensive to treat in an environmentally sound manner and many developing countries lack the specific regulations and necessary, adequate infrastructure, and technologies to implement 'win-win' solutions of this growing challenge. E-waste is a valuable commodity with more than 92% recoverable and reusable commodities, containing precious metals including gold, silver, copper, platinum, and palladium, as well as valuable bulky materials such as iron and aluminum, along with plastics that can be recycled. Overall, the United Nations University (UNU) estimates that

³ UNEP's Global Mercury Assessment of 2013

the resource perspective for secondary raw materials of e-waste is worth 55 Billion € of raw materials. Recycling of e-waste provides great business opportunities due to the high economic value of the materials. However, improper e-waste processing poses a serious hazardous waste problem. Recycling techniques such as burning cables for copper expose workers as well as their families to a range of hazardous substances.

- c. **Persistent Organic Pollutants (POPs):** Africa has witnessed significant increase in trade of hazardous materials that is reflected in its significant share of toxic contaminated sites. The mismanagement of chemicals, releases of unintentionally produced POPs (UPOPs) from open-burning and other sources, stockpiles and chemical waste including persistent organic pesticides, polychlorinated biphenyls (PCBs) and heavy metals such as mercury, and releases of chemicals in products such as polybrominated diphenyl ethers (PBDEs) and other brominated flame retardants present serious threats to human well-being and the environment in many parts of Africa. Open burning of non-segregated urban wastes and other toxic wastes (including e-waste, plastics containers, tires, etc.), result in incomplete combustion and release of unintentionally produced POPs (UPOPs) and pose a public health risk. The process generates harmful emissions that pollute the air, heavy metals and toxic chemicals that accumulate in soil and water causing food poisoning and serious health risks to workers and neighboring communities. Poor children in developing countries are especially vulnerable to these health risks as they are often forced to work in recycling of these materials or live in proximity of recycling facilities or their family members are often recycling at home. The widespread and unregulated dumping of municipal solid waste (MSW), comingled with hazardous, industrial and medical waste in urban areas is posing serious challenges in Africa where many cities are getting rapidly urbanized. Reducing open-burning practices and improving solid waste management leads directly to the reduction of releases and exposure from POPs, in particular from UPOPs. As can be seen from their NIPs, open-burning is a significant source of UPOPs releases in the participating countries, and a priority for Stockholm convention implementation.

Improving e-waste management including addressing unsound recycling practices leads directly to Persistent Organic Pollutants (POPs) release and exposure reduction, notably from UPOPs and Polybrominated diphenyl ethers (PBDEs).

African Governments face challenges related to inadequate capacity to effectively monitor the use of chemicals, lack of capacity for regulation and weak enforcement, lack of access to cleaner production systems, technologies for waste management and availability of information.

1.1 Background

The Africa Environmental Health and Pollution Management Programme (EHPMP) under the Global Environment facility grant with the World Bank is a regional Project developed to strengthen the institutional capacity to manage and regulate mercury use in ASGM and POPs/UPOPs in e-waste (electronic and electrical waste) in the Republics of Ghana, Senegal, Kenya, Zambia and the United Republic of Tanzania specifically. The country specific activities involving ASGM will be implemented in Tanzania and Ghana, while activities focused on waste will be implemented in Ghana, Zambia, Kenya and Senegal.

In Zambia, the EHPMP is a Government of the Republic of Zambia project financed by the Global Environment facility and World Bank's grant in the amounts of US \$8.256 million. The Zambia Environmental Management Agency (ZEMA) is implementing the project on behalf of the Ministry of Green Economy, and the Ministry of Local Government through the targeted Municipal Councils. The overall social risk classification of this project is '*substantial*' as it is likely to affect areas such as climate change; labour standards; transparency; non-discrimination; disability; public participation; and accountability, and expanded roles for grievance mechanisms.

The purpose of this FGRM is to outline EHPMP's approach to accepting, assessing, resolving, and monitoring grievances from those affected by the implementation of the project and sub project activities in a positive or negative way. It provides for a

transparent and credible process to all parties, resulting in outcomes that are fair, effective, and lasting.

The EHPMP is being prepared under the World Bank's new Environment and Social Framework (ESF), which came into effect on October 1, 2018, replacing the Bank's Environmental and Social Safeguard Policies.

1.2 Project Description

The Government of Zambia with support from the World Bank and the Global Environment Facility, is implementing a project entitled, Zambia – Environmental Health and Pollution Management Project (EHPMP), has an objective to reduce unintentionally produced organic pollutants pollution in pilot sites and strengthen the institutional capacity to manage and regulate solid waste and e-waste in Zambia.

The proposed EHPMP is aligned with the WBG's twin goals of ending extreme poverty and promoting shared prosperity. The EHPMP is aligned with and will support the objectives of Pillars 1 and 2 of the Bank's Africa Strategy – competitiveness and employment, and vulnerability and resilience, and the foundations of the strategy – governance and public-sector capacity. EHPMP will promote sustainable inclusive growth by improving access to environmental services through knowledge sharing and capacity building. EHPMP will further strengthen human capital by improving health of vulnerable populations, especially children. The EHPMP will complement other regional initiatives and individual projects, focusing on competitiveness, sustainability and governance.

The EHPMP will contribute to the GEF 6 Chemicals and Waste Focal Area Strategy that aims to achieve the long-term goal “to prevent the exposure of humans and the environment to harmful chemicals and waste of global importance including POPs, mercury and ozone depleting substances.”

The project is consistent with the Country Partnership Framework (FY19-FY23) that aims to help the Government of Zambia address the development challenges in its

priority areas identified in the Seventh National Development Plan. The project will directly contribute to the CPF’s focus area 1 “More even territorial development: Opportunities and Jobs for the poor”. Furthermore, Zambia recognizes that the challenges in pollution management facing the country require increasing efforts to reach a sustainable future growth scenario. The national development strategy identifies improper solid waste management as a health risk to the affected communities, further highlighted in the National Solid Waste Management Strategy (NSWMS) of 2004 which sets out an integrated approach to addressing the problem. The EHPMP is aligned with the second National Implementation Plan (NIP) for Zambia (2017), which sets out the roadmap and methodology for implementing the Stockholm Convention in the country. The NIP identified a need to strengthen environmental monitoring capacity, mechanisms and enforcement capacity of responsible institutions, as well as increase the level of awareness on the health risks associated with POPs and chemical pollution.



Figure 1: Map of Zambia, Project Location Source: <https://ontheworldmap.com/zambia/>

The EHPMP during implementation will be supported by the regional coordination project (BETF - P166233).

The Project has four components as described below:

Component 1: Institutional strengthening, knowledge and capacity building

The component aims to strengthen capacity to address environmental health risks associated with mercury use in ASGM sector and POPs releases from e-waste and solid waste dumpsites by enhancing the capacity of participating countries to obtain and share the information needed for their national decision-making. The capacity building component will also include developing shared protocols and methodologies for assessment of environmental health risks associated with ASGM and urban waste sector based on site (and country) specific health and environmental data, knowledge, risks and impacts.

Component 2: Policy Dialogue and Regulatory Enhancements

This component will strengthen stakeholder engagement at national and regional levels and environmental policies and regulations of participating countries. It will coordinate and maintain extensive and continued stakeholder engagement at national and regional level to support all components of the project and to strengthen the impact of national, regional and international processes committed to reducing environmental health risks associated with POPs and mercury and other chemicals and wastes.

Component 3 – Demonstrating application of technological tools and economic approaches - for reduced environmental health risks due to mercury, POPs and e-waste.

The component will finance specific capacity building and community-focused cleaner technology demonstration activities in contaminated areas that would be prioritized based on social, environment and economic factors. The demonstrative investments will be selected and designed based on environmental health risks and cost effectiveness of interventions. Opportunities to collaborate with the private mining companies in legacy

cleaner technology demonstration will be explored. In this context, the proposed project aims to leverage GEF's Chemicals and Waste Focal Area Strategy, which supports, "Development and demonstration of private sector partnerships, economics instruments and financing models that can achieve large scale and long-term investment in the reduction of production and use and emissions of harmful chemicals, including cleaning up contaminated sites and closure". The investments on specific technologies will be at the national level to meet the specific needs of the participating countries. The program aims to be technology neutral when developing child projects to ensure the most appropriate and cost-effective technology choices are made for each country. The investments will target identification of the community-focused cleaner technologies to support local level problem solving throughout the supply chain.

The expected outcomes of Component 3 are:

- a. Cleaner replacement technologies supporting phasedown of mercury usage produced by local manufacturers and adopted by mining communities;
- b. Cleaner technologies for waste management and e-waste recycling adopted;
- c. Private sector engaged in selected solid and electronic waste pilot project sites; and
- d. UPOPs from open burning of solid and electronic wastes in pilot sites reduced

Component 4: Project Coordination and Management

This component will provide support for project coordination and management; monitoring and evaluation at the national, and local levels. This component will cover the cost for project management, implementation and supervision of project activities, administration of procurement and financial management, implementation & supervision of environmental and social safeguards and monitoring and evaluation. The project will strengthen existing PCUs with additional staff to cover activities specific to this project and assist in preparing, implementing and monitoring approved activities in participating countries. This component will support the consolidation of Country-level project information, including indicator baseline, reference sources and measurement to aggregate the results and development outcomes at EHPM program level. In addition,

to the extent necessary, the analytical and preparation work, will be carried out with GEF and other implementation stakeholders to harmonize the reporting templates, tools, and processes to facilitate the national project reporting that will feed into the regional knowledge exchange platform.

1.1 Project Beneficiaries

The EHPMP focuses on addressing environmental health risks related to harmful chemicals and waste management. This will have socio-economic benefits for local communities, local and national revenues, and international trade in chemicals and waste such as e-waste and recyclable waste material. The project has a target population of 230,000 in Kabwe, whose direct beneficiaries include community-based organizations, private sector, NGOs, and local communities invested in pollution management. The project will create opportunities for income generation and green jobs. Consistent with the GEF Policy on Gender Mainstreaming and World Bank Group's Gender Equality strategy, the Program will provide an opportunity for women to maximize potential benefits from participation in the ASGM and e-waste sectors.

The EHPMP targets key stakeholders and policy makers as the primary audience, including the government of Zambia, and the respective ministries responsible for environment, Industries, Mines, Chemicals, and Health, and their regulatory enforcement agencies as well as municipalities. The Government will benefit from support for the enhancement its policies and development of guidelines and monitoring systems for the management of mercury and hazardous chemical waste, including e-waste.

The secondary audience will be industries, industry associations, NGOs, including CBOs, and local organizations representing those affected by harmful chemicals and wastes.

2 Redress Mechanisms for EHPMP

It is a requirement by the World Bank that all projects funded by the Bank have a Feedback and Grievance Redress Mechanism (FGRM) or Grievance Handling Policy in place. FGRMs are essential for the successful implementation of projects. The FGRM will

ensure that community members or any stakeholders are able to raise their concerns regarding project-related activities, including the application of relevant Social and Environmental Safeguards and Mitigation measures. The FGRM, once fully functional, will help project management enhance operational efficiency in a variety of ways including: generating public awareness about the project and its objectives; deterring corruption and fraud; providing project staff with practical suggestions/ feedback that allows them to be more accountable, transparent and responsive to beneficiaries; assessing the effectiveness of internal organizational processes; and increasing stakeholder involvement in the project. An effective FGRM will help identify problems before they become more serious or widespread, thereby preserving the project's funds and its reputation.

2.1 Purpose of FGRM

The purpose of this FGRM is to outline EHPMP's approach to accepting, assessing, resolving, and monitoring grievances from those affected by the implementation of the project and sub project activities in a positive or negative way. It provides for a transparent and credible process to all parties, resulting in outcomes that are fair, effective, and lasting.

This FGRM is specific to EHPMP and has been designed to ensure a speedy resolution of the project specific grievances. The FGRM seeks to give the Aggrieved Parties (APs) within the project scope access to seek redress to their perceived or actual grievance or any feedback that needs clarity.

The FGRM will encompass concerns as well as serious or long-term issues arising during project implementation. These may be felt and expressed by a variety of parties including individuals, groups, communities, entities, or other parties affected or likely to be affected positively or negatively by the Project. Feedback is about giving information

in a way that encourages the recipient to accept it, reflect on it, learn from it, and hopefully make changes for the better.

It is essential to have a robust and credible mechanism to systematically handle, give feedback and resolve any grievances that might arise in order that they do not escalate and present a risk to operations or the reputation of the project and its sponsors. If well-handled, an effective feedback and grievance mechanism can help foster positive relationships and build trust with stakeholders. This FGRM has been designed to promote dialogue and problem solving as an intermediate way for stakeholders to discuss and resolve problems. It is expected to primarily address interest-based conflicts such as those in which groups with some form of interdependency have a difference in (perceived) interest.

3 Principles of the EHPMP FGRM

This FGRM shall be guided by the following principles:

3.1 Equity

No grievance is too big or small. All grievances received shall be treated with the urgency and the attention they deserve. All Aggrieved Parties regardless of their social standing, gender, political affiliation, religious affiliation shall be given opportunity to be heard by the responsible officers without prejudice.

3.2 Accountability

The project outcomes should benefit the people in the targeted communities and as such the Project Management is accountable to the people in the communities, they operate in. The project should be responsive to the needs of the community including their grievances.

3.3 Transparency

Members of the community or APs have the right to information on the FGRM, how to access it, who is responsible for handling their grievances and the potential outcome of the processes.

3.4 Accessibility

All people in the target communities must have unrestricted and free access to the FGRM. The project shall publicize the FGRM to all those who may wish to access it and provide adequate assistance for APs who may face barriers of access, including language, literacy, awareness, finance, distance, or fear of victimisation. The AP shall be kept informed at each stage of the process.

3.5 Timely Response

This FGRM should function promptly and speedily. Prompt action is not only desirable from the grievances point of view, but also from the project management's point of view. Since delay causes frustration and anxiety, it is necessary that grievances are dealt with speedily.

Settlement of grievances "in the shortest possible time and at the lowest level possible," is the ideal one. Some of these cases and incidences might require reporting to the WB Task Team immediately.

3.6 Confidentiality

Every complaint will be treated seriously and dealt with consistently, in a fair, confidential and transparent manner. This will help to establish the legitimacy of the mechanism among stakeholders and ensures that it will be used. The personal details of Complainants will only be made available to those involved in the resolution of the grievance in question, and must follow policies related to protecting personal data when handling the grievance.

3.7 Anonymity

This FGRM will address anonymous complaints both written and verbal and will not disclose the identity(s) of the AP by name or otherwise to maintain confidentiality

4 EHPMP FGRM Goals and Objectives:

The EHPMP FGRM seeks to achieve the following objectives:

1. To be responsive to the needs of project beneficiaries by providing a channel for feedback and resolving grievances and disputes at the various levels in the project areas;
2. To provide a mechanism for stakeholder concerns to be addressed effectively, in a timely manner and by the most appropriate department before they escalate;
3. To Identify and monitor stakeholder concerns to support effective stakeholder and risk management;
4. To provide accessible avenues for all stakeholders to contact EHPMP and create an effective communication system between the project and the Aps;
5. To enhance the EHPMP reputation as a transparent project and a leader in Corporate Social Responsibility thereby deterring fraud and corruption; and
6. To provide a platform that ensures compliance with laws, regulations, cultural and traditional rules in the project area and meet requirements of international best practice.

5 Scope

The grievance mechanism will manage grievances from all stakeholders in all EHPMP project areas of interest where its operations will have an impact. It applies to all grievances that arise as a consequence of any EHPMP activity. This Process is designed to provide a system for managing grievance from the general public, and does not replace ZEMA's legal processes, existing employee grievance systems, normal business-to-business dialogue, or other management procedures already in place.

There are no restrictions on the type of issue(s) a stakeholder can raise under this procedure. However, when a complaint is received that would be more appropriately handled under a separate company process established for that purpose (such as employment or business integrity related issues), it will be re-directed so as to prevent parallel processes being followed. All complaints received under this procedure shall be tracked until close out, regardless of the process under which they are handled.

Company reserves the right not to address a complaint which it reasonably considers amounts to no more than general, unspecified, and therefore un-actionable dissatisfaction with the company, is otherwise malicious in nature, or concerns a matter for which the company has no formal responsibility (for example, a matter that the government controls).

The FGRM in Zambia covering the EHPMP will focus on priority areas as highlighted the Countries Partnership framework (FY19-FY23) that aims at helping the Government of Zambia address the development challenges in its identified in the Seventh National Development Plan.

6 Communication of the FGRM

In order to sensitise the various stakeholders (community, individuals etc.) about the FGRM, there will be need to produce a number of Information, Education and Communication (IEC) materials such as brochures and posters that will be used to educate various stakeholders about the content of the FGRM and how to access it. Additionally, radio programs will be produced to compliment IEC materials including translating the FGRM into local languages. Other sensitisation activities will include community meetings and public fora. The sensitization of the FGRM will be linked to the communication strategy.

7 Anticipated Grievances and Grievance Redress Services

Just like many projects with potential significant socio-economic and environmental impacts, it is inevitable that the EHPMP will have some local concerns. Grievances may

come in a number of ways, including: formal and informal complaints; minor concerns; or serious concerns. In all such and similar cases, having an all-inclusive, non-defensive and effective feedback and grievance redress mechanism (FGRM) in place is the most responsible thing. Grievances that will result from project implementation activities and are directly or indirectly related to the EHPMP shall be addressed by this FGRM.

8 Types of Remedies Available under the EHPMP FGRM

The EHPMP FGRM provides for categories of remedies for grievances which include:

8.1 Acknowledgement of Responsibility and Apology

In cases where the FGRM determines that the project management failed to undertake its obligations (e.g., failure to provide feedback to community on the project activities) and the impact on the AP is minimal, the ZEMA PIU shall acknowledge the problem and offer a written apology.

8.2 Clarification and Provision of Factual Information

In cases where it is determined that the grievance was based on lack of information or incorrect information on the part of AP, the project management shall respond by providing the correct information that should remedy the grievance. In instances where incorrect information may lead to harm, there is need to assess damage caused and provide appropriate remedy. The ZEMA PIU shall launch investigation in order to ascertain the cause and effect of the said damage.

8.3 Referral of the ZEMA Grievance Committee

For grievances and other issues that may be beyond the capacity of the ZEMA PIU, APs will be referred to the ZEMA Grievance Committee (ZGC) which is tasked with the responsibility of addressing such grievances for issues relating to ZEMA and its projects. The ZEMA PIU will endeavor to notify communities in project areas or entities prior to works commencing. This will be done in collaboration with the Social Expert

Furthermore, field verifications will be undertaken to confirm and ascertain extent of any losses that may result from project undertaking.

9.0 Grievance Administration

Grievances that will result from project implementation activities and are directly or indirectly related to the EHPMP shall be addressed by this FGRM. The FGRM shall be coordinated by the ZGC including the ZEMA PIU. The ZGC (see Annex 1) shall serve as both Project level information center and a grievance mechanism, available to those affected by implementation of all Project subcomponents throughout project planning and project implementation. The ZGC shall be established prior to commencement of any activities under the EHPMP.

The ZEMA PIU will be responsible that there is a transparent disclosure of information of the grievance mechanism by communicating the role and existence of the ZGC its function, the contact persons and the procedures to submit a complaint in the affected areas. Once each subcomponent is elected the ZGC will make information on its roles and responsibilities through information distribution and where possible information distribution through the website for ZEMA. The ZGC shall make all necessary effort within reason to adequately inform any vulnerable group or persons.

The ZGC shall be designed to be accessible, without cost to the complaint, effective, efficient and not precluding any official administrative or judicial legal remedy available under the applicable Zambian law.

Any grievance can be brought to the attention of the ZGC anonymously, personally or by telephone or in writing by filling in the grievance form by phone, e-mail, post, fax or personal delivery to the address of the PMU which will be known once established. The ZEMA PIU shall constitute function as the access point for all grievances and complaints. The ZEMA PIU, in collaboration with implementing municipality, shall ensure that it keeps a 'Complaints Register' that shall be accessible to the public at all

project sites. APs shall lodge complaints or grievances either anonymously or shall indicate their contacts in the 'Complaints Register'. The ZEMA PIU shall evaluate the nature of the grievance and take appropriate action within reason to resolve the concern. Alternatively, the APs will be allowed to lodge their complaint to the ZGC whose contact information shall be made available by the ZEMA PIU or may lodge the complaint straight to the ZGC (annex 1) using the online platform 'ZEMA Complaints' System.

10.0 FGRM Process

The purpose of the EHPMP FGRM is to define the procedure for managing stakeholder concerns and complaints (grievances) in a planned, timely, and respectful manner. All project-affected persons will be informed of their rights to raise grievances pertaining to EHPMP. Mechanisms will be put in place to ensure that grievances are recorded and considered fairly and appropriately. There are 5 steps in the EHPMP FGRM Process, as detailed below, followed by a flowchart (see Table: 1 for the flow chart and a schematic representation in the annexes section) describing the process:

Step 1: Identifying Focal Points

One officer from the ZEMA PIU team shall serve as focal point for all grievances related to the EHPMP and shall be responsible for receiving and registering complaints from Affected Parties (APs). This FGRM is designed to give the APs access to seek redress to their perceived or actual grievance(s) using this mechanism or other existing mechanisms such as the National Legal System (i.e. local Courts, magistrate courts, High court and Supreme Court), various tribunals (e.g. Land tribunal), mediation boards. There will be someone with the overall responsibility of tracking and following up on issues and complaints raised.

Step 2: Registration of Grievances

Grievances will be logged in the Grievance Register (Annex 2) within a day of receiving the grievance by the assigned officer from ZEMA PIU. The grievance owner may delegate responsibilities to other staff, but will be responsible for defining and implementing resolution actions, investigating the grievance, consulting relevant persons within the project site, making sure resolution actions are completed, tracking progress of individual grievances, aggregating.

The FGRM will accept complaints from the AP submitted through verbal, email, mail or other website means, phone (call or text) or letter to the ZGC, in English or any local language spoken in the location of the project site. The use of local language is aimed at ensuring inclusiveness and ease of accessing the complaint system by community members' improvement. Confidentiality will be upheld as a key principle in administering the FGRM. Receipt of grievances shall be acknowledged as soon as possible, by letter or by verbal means.

Step 3: Assessment and Investigation

The assigned officer from ZEMA PIU after receiving and registering a complaint will formally acknowledge grievance within 5 working days of the submission of the grievance, informing the Complainant that EHPMP objective is to respond within 21 working days. The Grievance Owner will, while collaborating with the EHPMP Social Expert, lead grievance investigation, when needed, which could include collecting relevant documents, making site visits, consulting appropriate internal staff, contacting external stakeholders, and other activities (see annex 4). Investigation findings will be used to document decision making process and inform proposed remedy. Verbal and then written feedback will be provided so that a record of correspondence is retained and recorded. At this stage an opportunity to seek further clarifications on issues from the grievance or request further information will be done. If grievance is considered out-of-scope for the grievance mechanism the assigned officer will draft a response

explaining why it is out-of-scope and providing any guidance of where to go to get the issue addressed (if possible).

The following is a summarized criteria that will be used to assess and verify eligibility:

1. The complainant is directly affected by the project;
2. The complaint has a direct relationship to the project;
3. The issues raised in the complaint fall within the scope of the issues that the FGRM is mandated to address.

Having completed the Feedback/Complaint Form, a response will be formulated on how to proceed with the complaint. This response should be communicated to the AP. The response should include the following elements:

1. Acceptance or rejection of the complaint
2. Reasons for acceptance or rejection
3. Next steps – where to forward the complaint
4. If accepted, further documents and evidence required for investigation e.g. Field Investigations.

Once the registered grievance or complaint has been determined as falling within the scope of this FGRM, the Grievance Owner shall investigate the complaint. Investigation of the complaint may include the following:

1. On site visit and verification;
2. Focus Group discussions and interviews with key informers;
3. Review of secondary records (books, reports, public records); and
4. Consultations with local authorities and relevant institutions

At the end of the field investigation, the Grievance Owner shall compile a Grievance Investigation Report (GIR) using a standard template (annex 4 on the outcomes of the investigations and the specific recommendation to resolve the grievance or complaint. A

monthly report will be prepared, covering all cases recorded during the month under review.

Step 4: Recommendations and Implementation of Remedies

After the investigations, the assigned officer from ZEMA PIU shall inform the APs of the outcome and the recommended remedies if any. If the person sorting out the grievance decides that there has been a breach of one of EHPMP policies or standards, may discipline the person or people who breached the standard or policy

In cases where a Complainant is unsatisfied with and/or unwilling to accept the resolution actions proposed, the grievance may be accelerated to the ZEMA Grievance Committee (ZGC) for review and final decision. The ZGC reviews the case and determines if further reasonable action is possible. If options for reasonable, justified corrective actions are exhausted, a written notice should be provided to the complainant notifying him or her that their grievance is being closed. Supporting documentation of resolution actions and the Grievance Mechanism Procedure will be sent with the notice.

Step 5: Follow-up and Close Out

If the Complainant accepts the proposed resolution, the agreed actions are implemented. The Grievance Owner is responsible for assigning action parties, actions, and deadlines to implement the resolution.

When the investigations are concluded, the ZEMA/EHPMP Social Expert shall provide feedback to the AP who within 5 days or less shall agree or disagree with the proposed remedies. If the AP is agreeable to the remedy, the PIU shall ensure that the remedy is implemented within the agreed period.

In an event that the AP is not satisfied with the recommended remedy, the EHPMP Social Expert shall forward the copy of GRFF and the GIR to ZGC (See Annex 3 for the

PIU Referral in the annexes section) these are recorded in the Grievance Register with any supporting documentation, after which the focal point person will conduct investigations and complete a GIR and communicate to the AP within 5 working days. The ZEMA/EHPMP Social Expert should consider reasons why the AP rejected remedies offered earlier.

If and when the AP disagrees with the recommendation by the PIU, ZEMA/EHPMP Social Expert Person shall within five days of receiving the notice of rejecting the offer from the AP, compile all the necessary documents regarding the grievance from ZEMA PIU to the ZEMA Grievance Committee (see Annex 3).

If necessary, monitoring arrangements will be put in place to verify implementation. After resolution, the grievance would be formally closed out. This includes requesting the Complainant sign a completion form to document satisfaction with resolution actions, documenting actions taken, and closing out in the Grievance Register.

11. PROCEDURES AND TIMEFRAME

The entire FGRM process should not exceed 21 working days.

Table 1: Grievance Action Timeframe

ACTIONS	TIMEFRAME
Recording, reporting, and sorting s;	1 day
Conducting an initial assessment of s to establish the eligibility of the grievance received;	5 working days
Referring to EHPMP Social Expert within the FGRM structure;	1 day
Making decisions, including parameters and standards for accurate and consistent decision making;	5 working days
Notifying APs and other affected parties of eligibility, the resolution process, and outcomes;	All cases should be disposed of within 21 working days.
Tracking, monitoring, documentation, and evaluation by PIU and Sub PIUs.	21 working days.

Annexes 1 to 4 show the grievance handling structure, followed by a chart showing a summary of the grievance handling process.

12. ANNEXES

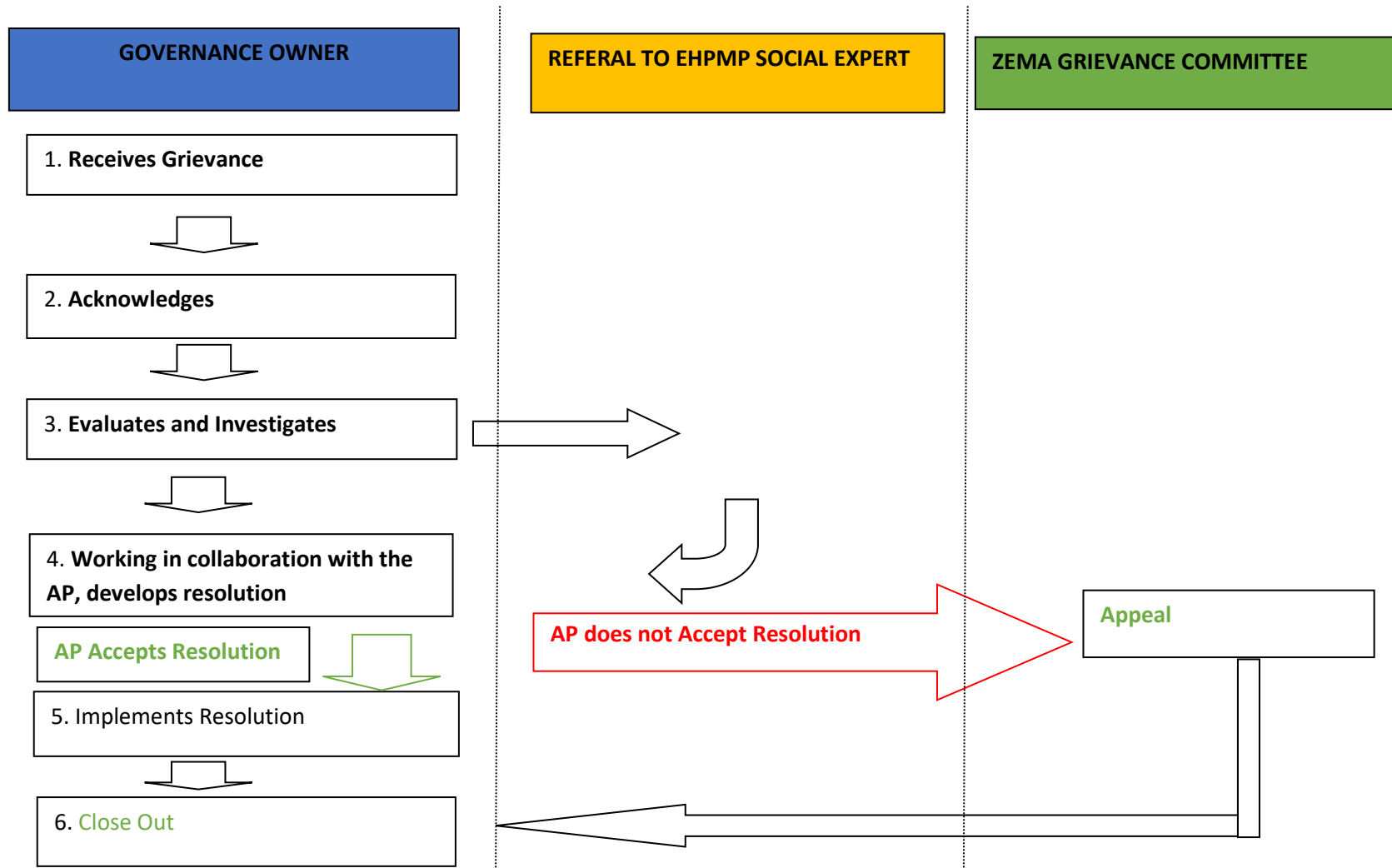
ANNEX 1: ZAMBIA ENVIRONMENTAL MANAGEMENT AGENCY

The Grievance handling process shall interface with the already existing complaint handling procedure for ZEMA however should complaints arise that are related to the project the following committee shall preside over the grievances.

Level	Grievance Committee	Redress roll
ZEMA-PIU	Project Coordinator- Focal Point Person	Record grievances, conducting an initial assessment of grievances to establish the eligibility of the grievance received, Receive and resolve grievances Refer grievances to the Committee
ZEMA-PIU	Manager Operations- South Manager Operations- North Principal Inspector- Water, Nosie and Air Principal Information and Research Officer	Offer technical support and resolve grievances referred by the focal point person



STEPS IN THE GRIEVANCE REPORTING MECHANISM PROCESS



ANNEX 2: GRIEVANCE/FEEDBACK REGISTRATION FORM

Date and complaint no.	Received by:	Received from (name, address, phone no.)	On behalf of	Communication method	Issue	Action	Outcome	Active or closed/ Date
03.04.2019	XXXXX	YYYY	N/A	Face to face	Construction equipment left unattended to on my road.	Construction equipment removed to a safe place where they will not be a hazard to the public	Complainant satisfied with action take	Closed

(NB: If complaint is still active, proceed to Complaint details form)

Signed (Assigned Officer) Date: / /

Signed:(AP) Date: / /

ANNEX 3: EHPMP GRM Referral Form

This form can be filled out for complaints not conclusively resolved at PIU level and e-mail the completed form to the relevant Project Team.

1. Complainant’s Information *(This information must be provided. The identity of complainants will be kept confidential if they request so.*

Names:.....

Title: Dr., Mr., Ms., Mrs. *Please check one or*

Positions/Organizations *(If any)*.....

Addresses:

Contact numbers:

E-mail addresses:

Please indicate how you prefer to be contacted (e-mail, mobile, etc.):

.....

Do you request that identity be kept confidential? *Check Yes or No below*

Yes

No

2. Information on Authorized Representative *(If any). (If Authorized Representatives are not complainants themselves, their names will be disclosed as needed, in order to ensure transparency).*

Names and Titles

Positions/Organizations *(If any)*:.....

Addresses:.....

Contact numbers:.....

E-mail addresses:

3. Project Information

Project Name: EHPMP Project Number

Project location (Province, City, etc.)

4. The Complaint

(a) What harm do you believe the EHPMP caused or is likely to cause to you?

.....
.....
.....

(b) Why do you believe that the alleged harm results directly from the EHPMP?

.....
.....
.....

(c) Please include any other information that you consider relevant.

.....
.....
.....

5. Previous Efforts to Resolve the Complaint

(a) Have you raised your complaint with the grievance mechanism of the project?

Yes If YES, please provide the following:

- When, how and with whom the issues were raised.

.....
.....
.....

- Please describe any response received from and/or any actions taken by the project level grievance mechanism. Please also explain why the response or actions taken are not satisfactory.

.....
.....
.....

No If NO, why not?

.....
.....
.....

How do you wish to see the complaint resolved?

.....
.....
.....

(b) Do you have any other matters or facts (including supporting documents) that you would like to share?

.....
.....
.....

ANNEX 4: GRIEVANCE INVESTIGATIVE FORM

Project Area.....

	Complaint	
	Name of Aggrieved Person/Address/ward	
	Complaint background How did the complaint come to light? What action have been taken to resolve the issue	
	Remit of the investigation 1. Specific aspects of concerns being investigated regarding the complaint	
	Investigation process 1. Brief description of methods used to conduct the investigation. Field visits, focused group discussions, interviews 2. A record of what interviews statements were undertaken and documents reviewed	
	Witnesses 1. List of witness interviewed	
	Summary of findings and observations for each specific complaint investigated/cross reference any documents where needed	

Prepared by:.....

Verified by:.....

Signed:

Signed:.....