

Morocco: Project Guelmim

Stakeholder Engagement Plan



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ABBREVIATIONS

AREP	Agence Régionale d'Exécution des Projets de Guelmim Oued Noun (Regional project implementation agency)
EBRD	European Bank for Reconstruction and Development
ESMS	Environmental and Social Management System
E&S	Environmental and Social
ESP	Environmental and Social Policy
GMR	Grievance Mechanism Redress
ONEE	Office National de l'Eau et de l'Electricité (National Office for Water and Electricity)
SE	Stakeholder Engagement
SEP	Stakeholder Engagement Plan
WWTP	Wastewater Treatment Plant

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Introduction

Guelmim-Oued Noun Region is developing two strategic projects aimed at addressing growing water scarcity (collectively the “Project”), with financing support from the European Bank for Reconstruction and Development. The implementing agency for this Project will be the Regional Agency for the Execution of Projects of Guelmim-Oued Noun Region (Agence Régionale d'Exécution des Projets or “AREP”. The Project includes:

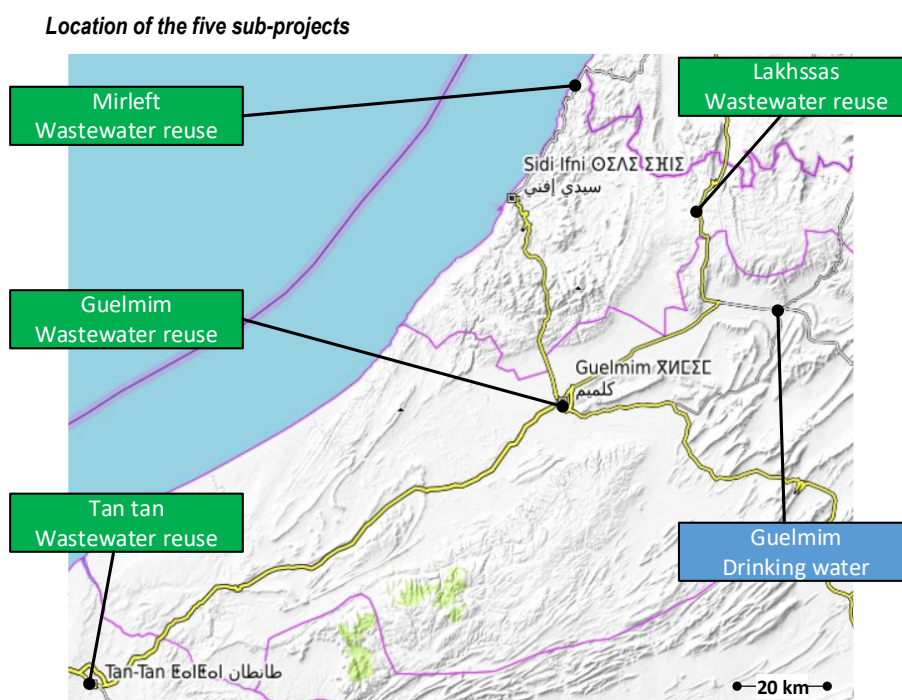
- Drinking water supply project: The project is part of the 2020-2027 National Drinking Water Supply and Irrigation Program (Programme National pour l'Approvisionnement en Eau Potable et l'Irrigation or “PNAEPI”) and aims at increasing access to drinking water for households in rural areas in the province of Guelmim by ensuring potable water treatment facilities are fully equipped.
- Recycling and reuse of wastewater for green spaces irrigation project: The project involves the upgrade of four existing Waste Water Treatment Plants (“WWTPs”) to enable the reuse of treated water for watering green spaces in the Region. The WWTPs in Guelmim, Tan Tan, Lakhssas and Mirleft are currently discharging all the treated water in nature while green spaces in the Region are watered using potable or underground water. WWTPs are expected to introduce tertiary treatment and align the standard of wastewater treatment with both national and EU requirements.

The Project is categorised “B” in accordance with the EBRD Environmental and Social Policy (ESP) (2019). The EBRD retained an independent consultant, Alpage, to carry out an Environmental and Social (E&S) Assessment of the Project.

This report is the Stakeholder Engagement Plan prepared by Alpage together with the independent environmental and social due diligence (“ESDD”) report. An Environmental & social Action Plan, an Environmental and Social Management Plan and a Non-Technical Summary were also prepared.

I. Projects description

The Project consists of 5 sub-projects located in Guelmim province: one is related to Drinking water and four are related to wastewater reuse. The location of these sub-projects is shown on the following figure:



I.1 Guelmim, Tan Tan, Lakhssas, Mirleft wastewater reuse sub-projects

These four sub-projects follow the same concept: each of these four cities has a Wastewater Treatment Plant (WWTP), and the objective of each sub-project is to collect the effluent from the WWTP, to treat it additionally ("tertiary treatment") so that water can then be reused for the irrigation of trees in green spaces and green belts.

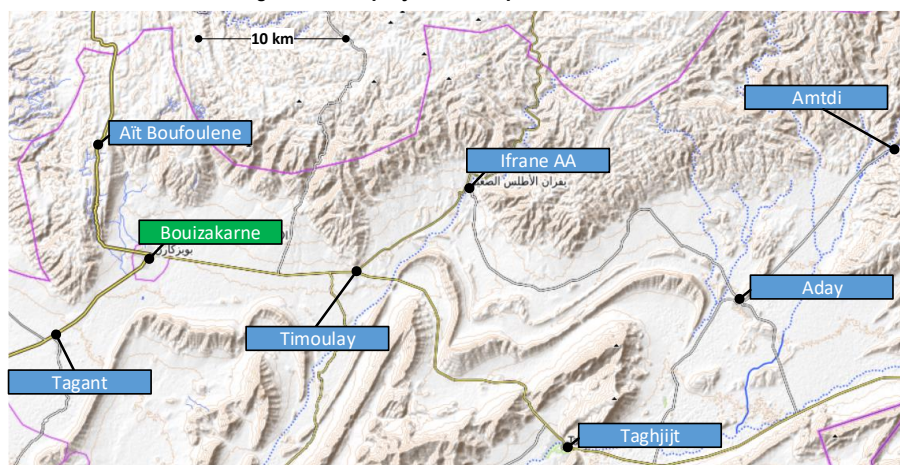
I.2 Guelmim drinking water sub-project

This sub-project is about the rehabilitation and extension of drinking water systems in six municipalities within Bouizakarne district, located in Guelmim region (see the figure below). The municipalities are located East-North-East from Guelmim, at a distance of 50 km to 112 km. Each municipality consists of several settlements, as described in the following table.

Municipalities benefiting from Guelmim drinking water sub-project

Municipality	Official number of settlements	2014 Population (hab)
Aday	4	3 630
Amtidi	7	1 472
Tagant	4	3 630
Taghijit	10	9 988
Ifrane AA	41	11 467
Timoulay	10	5 324
Total (without Aït Boufoulene)	76	35 511

Location of the drinking water sub-project municipalities



I.3 Implementation arrangements

The Project will be implemented by the regional projects implementation agency or "AREP", an agency that was set-up by the Guelmim Oued Noun Regional Council, pursuant to article 128 of law 111-14 that defines the organization of regions in Morocco.

I.3.1 Drinking water sub-project

Drinking water is currently produced and distributed by ONEE in town and by users associations in the douars.

The project, which essentially involves rehabilitating existing networks, will be:

- Implemented by AREP which will manage the studies and works.
- Operated in the future by a Multipurpose Regional Company, "MRC", that is yet to be created (subject to a new legislation that is already announced, but still under preparation). In the interim, it is assumed that ONEE and the associations will continue distributing drinking water.

I.3.2 Wastewater reuse sub-projects:

The Draa Oued Noun River Basin Agency is responsible for carrying out studies for the reuse of wastewater, while the execution and completion of the works will be the responsibility of AREP.

Wastewater treatment plants are existing in all four cities, and are managed by ONEE.

The wastewater reuse projects essentially aim at building networks for the transfer of treated wastewater to green spaces, to be determined by the beneficiary cities.

AREP assumes that these networks will be maintained/operated by the MRC in future, but this is yet to be confirmed.

The use of treated wastewater for irrigation will be managed by the cities.

I.4 Schedule

The project is expected to extend on several years:

- Year 1: Studies required to finalize the technical and institutional project.
- Year 2: Preparation of bidding documents and selection of contractors.
- Years 3-4: Construction.

II. Applicable requirements

II.1 Stakeholder Engagement

II.1.1 National Legislation Requirements

The basis of Moroccan regulatory requirements for public consultation and disclosure of information in the context of the assessment and management of environmental and social risks and impacts of projects is given by the 2011 Constitution. In its preamble, the constitution recognizes the principle of participation as one of the foundations of the Moroccan state. The first article stipulates that "citizen and participatory democracy is among the foundations of the constitutional system of the kingdom".

Article 156 stipulates that "The public services listen to their users and assure attention to their observations, proposals and grievances".

1.1.1.1 II.1.1.1. Regulation of environmental assessment and management

The project is not subject to the EIA and therefore is not subject to the obligation of public inquiry.

1.1.1.2 II.1.1.2. Regulation of expropriation

Moroccan regulations on expropriation are enacted by law n°7/81, promulgated by dahir n° 1-81-254 of May 6, 1982 and by application decree n° 2-82-382 of April 16, 1983. The procedure is based on a declaration of public utility - an administrative act which specifies the area likely to be subject to expropriation.

The requirements regarding information and consultation of the public are as follows:

- The publication of the signed decree of public utility is ensured by the expropriating party, at least in two national newspapers, one in Arabic and one in French, authorized to receive legal announcements, with mention of the number and date of the Official Bulletin in which the decree was first published.
- A full display of the decree of public utility is made available to the public at the headquarters of the municipality of the area affected by expropriation.
- The second stage of the procedure is the drawing up of a "transferability deed", which aims to designate precisely the limits and the consistency of the real estate properties necessary for the realisation of the Project.

Law 7/81 stipulates that the act of transferability must be preceded by an administrative enquiry. A draft of the said deed must be deposited, together with a plan, for a period of two months from its publication in the Official Bulletin, at the office of the municipality where the interested parties may take cognizance of it and present their observations for a period of two months. In particular, they must make known all farmers, tenants and other holders of rights over the buildings, failing which they alone shall be liable to these persons for any compensation they may claim. Other third parties are required to make themselves known within the same time limit, failing which they will be deprived of all rights.

The transferability deed must be published in the same way as is legally required for a declaration of public utility

The project is likely to resort to expropriation for the acquisition of the land necessary for several sub-projects.

II.1.2 EBRD requirements

The EBRD recognizes the importance of stakeholder engagement as an essential element of good international practice and corporate citizenship. PR10 contains the following provisions:

- Stakeholder identification and analysis. The Company will identify and document stakeholders, who: (i) are affected or likely to be affected by the Project (affected parties), or (ii) may have an interest in the project (other interested parties), including vulnerable groups.
- Stakeholder Engagement Plan shall be developed in order to outline how communication with identified stakeholders will be handled throughout Project preparation and implementation.
- Information disclosure. Disclosure of relevant project information helps stakeholders better understand the risks, impacts and opportunities associated with the Project.
- Meaningful consultation. If employees and/or affected communities will or may be exposed to significant risks or adverse impacts from the project, the Company will undertake a meaningful consultation in a manner that provides stakeholders with opportunities to express their views on project risks, impacts, and mitigation measures, and allows the Company (project proponent) to consider and respond to them.

II.2 Grievances Management

II.2.1 National Legislation Requirements

Moroccan legislation recognizes the right of citizens to express complaints and requires public authorities to receive, process and take these complaints into account.

In 2011, the new constitution provided the legal basis for the management of complaints in Morocco, establishing transparency and accountability as principles that should govern the relationship between the Moroccan administrative apparatus and its users and recognizing that they have the right to be listened to by the administration, which has a duty to take their observations, proposals and complaints into account (Art. 256).

In 2017, Decree No. 2-83-620 came to regulate the architecture and mode of operation of the complaints management mechanism and to require each entity in charge of a public service (administrations, local authorities, etc.) to set up a structure in charge of receiving and processing user complaints and documenting it. This structure must be equipped with the skills and the logistical means to carry out its work effectively.

The architecture of this mechanism called *Chikaya* ("complaint" in Arabic) is that of a national mechanism intended to collect and process the concerns of users of the administration, their observations, suggestions or complaints and to take them into account in improving its efficiency and its performance.

It revolves around a national electronic portal maintained by the Department of Administrative Reform with the technical support of the Digital Development Agency.

The body defined by Decree No. 2-83-620 (articles 13, 14, 15 and 16) for the management of complaints is called the "Unit for the Collection, Monitoring and Processing of

Observations, Proposals and Complaints from users”. Each administration is called upon to set up such a unit and provide it with the means to operate effectively, including qualified human resources and adequate technical means, computer equipment, etc.

II.2.2 EBRD requirements

- The Owner of the project will need to be aware of and respond to stakeholders' concerns related to the Project in a timely manner. For this purpose, the owner of the project will establish an effective grievance mechanism to receive and facilitate resolution of stakeholders concerns and grievances, in particular, about the Company's environmental and social performance.
- Reporting to stakeholders. Throughout the life of the Project, the owner of the project will provide information to identified stakeholders, on an ongoing basis. Where appropriate, the owner of the project will also seek feedback from affected parties on the effectiveness of the impact mitigation measures.

III. Stakeholders Identification and analysis

Project stakeholders are defined as individuals, groups or other entities who: (i) are or could be affected directly or indirectly, positively or negatively, by the project (also known as "affected parties"); and (ii) may have an interest in the project ("Other interested parties"). These are individuals or groups whose interests may be affected by the project and who are likely to influence the results of the project in some way.

Cooperation and negotiations with stakeholders throughout project preparation often requires also identifying those individuals who act as legitimate representatives of their respective stakeholder groups, i.e. individuals to whom other members of the group entrusted with the task of defending the interests of the group during the process of dialogue and consultation with the project. These representatives can provide useful information on local realities and be the main means of disseminating information about the project and the first link of communication or exchange between the project and the target communities as well as the networks they will have established. Verification of the mandate of stakeholder representatives (i.e. the process by which their legitimacy is confirmed and it is established that they are indeed advocates of the community they represent) remains an important task in the process of engaging with stakeholders. This verification can be done in the context of informal exchanges with a random sample of members of the communities concerned and taking into account their views of who can best represent them.

III.1 Methodology

To ensure effective and tailor-made mobilization, the stakeholders of the proposed project(s) can be divided into the following broad categories:

- Affected parties – individuals, groups and other entities present in the project's area of influence who are or could be directly affected by the project and/or have been identified as most likely to be affected by changes caused by the project, and which must be closely associated with the determination of the effects of the project and their significance, as well as the definition of the related mitigation and management measures;
- Other affected parties — individuals, groups or entities who may not be directly affected by the project, but who consider, or feel that their interests are affected by the project and/or who could influence the project and its implementation in any way; and
- Vulnerable groups — individuals who may be disproportionately affected or who are more disadvantaged by the project than any other group due to their vulnerability who may need special measures to be represented equally in the consultation and decision-making process associated with the project.

III.1.1 Affected parties

Affected parties, as defined at this stage, include the following individuals and groups:

Wastewater reuse subprojects

- Users of green spaces irrigated by treated wastewater under the project;
- Workers in the irrigation of beneficiary green spaces;
- Owners and users of the land to be acquired for the project;

- Local residents who will be affected by the environmental and social impacts of the works;
- Current users of treated wastewater in irrigation;
- All inhabitants of the beneficiary towns;

Drinking water subproject

- Water users benefiting from the project
- Associations operating locally in production and distribution of drinking water
- Owners and users of the land to be acquired for the project
- Local residents who will be affected by the environmental and social impacts of the works

III.1.2 Other parties involved

Project stakeholders also refer to individuals, groups or entities that are not directly affected by the project, including:

Wastewater reuse subprojects

- Regional agency for the execution of projects
- Local Authorities
- Communes of the involved cities
- National Office of Electricity and Water – Water Branche
- National Agency for Water and Forests
- Hydraulic Basin Agency
- NGOs working in environmental protection

Drinking water subproject

- -Local Authorities;
- -Communes of the involved localities ;
- -National Office of Electricity and Water – Water Branche
- - Hydraulic Basin Agency;

III.1.3 Vulnerable individuals or groups

It is particularly important to determine whether project effects could disproportionately affect disadvantaged or vulnerable individuals or groups who often lack the means to voice their concerns or understand the full extent of a project's impacts. It is also important to ensure that the awareness raising and mobilization actions focused on disadvantaged or vulnerable individuals or groups, are adapted to take into account the particular sensitivities, concerns and cultural realities of these individuals or groups and ensure that they fully understand the activities and benefits of the project. This vulnerability can be attributed to an individual's origin, sex, age, state of health, economic precariousness and financial insecurity, to their dependence on other individuals or natural resources, etc. Dialogue with vulnerable individuals and groups often requires the application of specific measures and the granting of particular assistance to facilitate their participation in decision-making within

the framework of the project, so that they are aware of and can contribute to the overall process on the same basis as other stakeholders.

Under the Project, vulnerable or disadvantaged groups may include, but are not limited to, the following entities:

- Children using green spaces irrigated with treated wastewater
- Illiterate women using green spaces irrigated with treated wastewater
- Illiterate elderly people using green spaces irrigated with treated wastewater;
- Illiterate municipal workers involved in irrigating green public spaces with treated wastewater;
- Female heads of poor households affected by land acquisition,
- Persons with disabilities affected by land acquisition

Vulnerable groups within the communities affected by the project will be confirmed and consulted using dedicated means, if necessary and relevant.

IV. Stakeholder Engagement Activities Undertaken to Date

Stakeholder engagement in the project to date has consisted of dissemination of information to the public through national and local media, meetings conducted during project preparatory studies, discussions between donors and the institutions carrying out the project and in meetings and exchanges on the project sites with the institutional stakeholders and with the populations potentially affected during the environmental and social due diligence.

IV.1 Project disclosure and media coverage

Information was disseminated to the public about the project by several national medias (*Challenges*, *L'Economiste*, *le 360.ma*, *MAP*, etc.). As the project deals with drinking and irrigation water in an area where hydric stress has reached alarming levels, it is attracting interest. However, while the heads of the main institutions concerned (Wilaya, provinces, municipalities, Water and Forests, Hydraulic Basin Agency, ONEE) are aware of the project, the local populations are less aware of it.

IV.2 Engagement activities during the E&S due diligence

E&S due diligence investigations were conducted in the field for one week from March 13 to 18. On this occasion, several meetings were held and exchanges took place with the main institutional actors concerned by the project, Region, AREP, Wilaya, Provinces, ONEE-BO, Hydraulic Basin Agency, National Agency for Water and Forests, at the Guelmim Oued Noun regional headquarters first, then at the level of each of the sites of the wastewater treatment and drinking water production sub-projects. A meeting was held at the headquarters of the municipality of Ifrane with municipal leaders and with the leaders of the associations involved in the production and distribution of drinking water in the area. Discussions also took place in the field with users of wastewater treated by the Guelmim STEP.

V. Stakeholders Engagement Program

V.1 Principles

In line with the most recommended approaches, the project will apply the following principles to stakeholder engagement:

- Approach focused on transparency and the life cycle: public consultations concerning the project(s) will be organized when relevant, and carried out in a transparent manner and free from any external manipulation, interference, coercion or intimidation;
- informed participation and advice: information will be communicated and distributed widely to all stakeholders in an appropriate form; means will be made available to receive the opinions and concerns of stakeholders and to analyse them and take them into account;
- Absence of exclusion and consideration of diverse and varied needs: stakeholders will be identified in order to improve communication and build strong relationships. The process of Participation in the project is intended to ensure that no one is excluded. All stakeholders are encouraged at all times to participate in the consultation process. All stakeholders have equal access to information. Taking into account the needs of stakeholders is the fundamental principle that underlies the choice of modes of dialogue and consultation. Particular attention is paid to vulnerable groups, in particular women, young people and the elderly, and the cultural realities of different ethnic groups.
- Flexibility: if social distancing measures limit the use of traditional forms of mobilization, the chosen methodology should be revised to take into account other techniques, including different forms of internet communication.

V.2 Roles and Responsibilities

It is the Region as the project owner who will have the primary overall responsibility for implementing the SEP and managing the dialogue with the project's stakeholders throughout its life cycle.

It will be responsible for conducting activities for the disclosure of relevant information to stakeholders, conducting public consultations and managing the complaints management mechanism. It will also be responsible for updating this SEP as needed.

V.3 Stakeholder engagement Matrix

Stakeholder	What to disclose	How	When
All stakeholders	General information about the Project, its Environmental and social potential impacts and their mitigation measures	Creation of a webpage for wastewater reuse sub-projects and a webpage for the drinking water sub-project in Arabic and French	As soon as all agreements and permits for the project are in place, and in any case before project construction starts

Stakeholder	What to disclose	How	When
Regional public	General information about the Project, and Region/AREP's contact for more information	NTS disclosed on the webpage(s) Public meeting at each of the localities in which the sub-projects are located	Before project construction starts
Regional mass media	Information on project	Press release with the NTS	Before project construction starts
Local authorities, Communes and institutions involved the reuse of wastewater in irrigation of public green spaces	Health and safety issues related to the reuse of wastewater in irrigation of the public green spaces	Meetings	Before project exploitation starts and -permanently during exploitation
NGOs involved in production and distribution of drinking water in Guelmim Province	Health and safety issues related to the production and distribution of drinking water	Training sessions	Before project construction starts
The potential users of green spaces that will be irrigated with wastewater reused	Detailed information on the risks and impacts for the public of the contact with green spaces irrigated with reused wastewater, and instructions on how to avoid such risks and impacts	Clear and detailed instructions to users displayed in the different green areas irrigated with treated wastewater	Permanently during Exploitation
The workers operating the irrigation of green spaces with reused wastewater	- General information on wastewater reuse in irrigation, on the risks and impacts for workers, mitigation measures, protection procedures,	-Written instructions -Training sessions	Before Exploitation starts and Permanently during Exploitation
The beneficiaries of the drinking water sub-project	General information on the project, detailed information on the production and distribution of drinking water, its cost and the technical conditions for maintaining water quality	Public meetings	During the preparation of the project (before the construction starts)
People potentially affected by land acquisition for the project	General information on the project, on the land to be acquired and on the acquisition procedure and the strategy of compensation of PAP	-Meetings with potentially affected people -Disclosure of the LRF and The LRPs	Before and during land acquisition procedure (before Project Construction)
People potentially affected by Project environmental and social impacts of construction works	Information on the project, on construction works environmental and social risks and impacts, on the construction works schedule	Disclosure of the schedule of dates and locations of the works Signposting and marking of work areas Prior meetings with local residents	Before and during construction works
Farmers currently using wastewater in irrigation	General Information on the project, on its benefits and impacts, and on the specific measures to mitigate impacts on farmers current use of wastewater in irrigation	-meetings with potentially affected farmers	Before construction starts
Suppliers of works, goods and services	Information on project procurement schedule Information on EBRD performance requirements	Through the webpage Through bidding documents	Before construction starts During tender process

Stakeholder	What to disclose	How	When
Job seekers	Information about vacancies. Information that positions are open to both men and women	project's webpage + official job announcement tools agreed with the employment bureau and the population representatives	During Project implementation

VI. Grievances Management

If a stakeholder has a complaint or grievance, this will be dealt with through a grievance mechanism that will be managed by the Grievance Mechanism Manager. The objective is to resolve problems in a timely manner.

The figure below presents the Project's grievance mechanism, which, in summary, includes the following steps:

- Registration and filing of the complaint;
- Acknowledgment of receipt to the complainant;
- Investigation of the complaint by the Project;
- First draft resolution by the Project;
- If proposed resolution accepted, resolution signed by the Project and the complainant;
- If the first proposed resolution is not accepted by the complainant, recourse to the Mediation Committee.

VI.1 Registration of complaints

The places for registering complaints are either the national portal www.chikaya.ma, or the Region's website, or the Complaints Collection Monitoring and Processing Units (URSTP) of the Project implementation entities, directly.

Potential complainants can submit their complaints through one of the following channels:

- Through the national platform www.chikaya.ma;
- On the Region's website on the page dedicated to complaints registration ;
- Directly with the Reception, Monitoring and Complaints Processing Units created within the various Project implementation entities, or if such structures do not yet exist through the intermediary of the person responsible for managing the complaints pending the creation of the URSTP. The address and location of the URSTP office or of the person who assumes his function will be disseminated to the stakeholders.
- by telephone (the telephone of each URSTP will be distributed to the stakeholders of the component or sub-component of the Project concerned)
- by post: the postal addresses of the URSTPs will be distributed to the project stakeholders,
- by e-mail: the e-mail address of each URSTP will be distributed to the stakeholders likely to contact it.

The contacts of NGOs specializing in issues of violence against women will also be disseminated to potential complainants so that they can contact them directly.

VI.2 Complaints process

Once the complaint has been registered, and an acknowledgment of receipt with a file number is communicated to the complainant, the proposed process is shown in Figure 3. In summary, it comprises the following steps:

- Completion of the complaint form, a model of which is provided in Appendix 2 of this SEP, if the complainant formulates his complaint by telephone or presents himself at the premises of one of the Project implementation entities and does not know the do it himself. The complaints officer will complete the form in the case of a verbal complaint and for all persons who may not be able to complete a document in writing;
- Delivery of a paper acknowledgment of receipt to the complainant;
- If the complaint is sent by mail or via the Chikaya.ma portal, check that it contains all the information and send an acknowledgment of receipt to the complainant;
- Filling in the complaint register (Excel file, see model in appendix);
- Examination of the complaint by the URSTP concerned (site visit, on-site interviews with the complainant, on-site interviews with the representatives of the authority and/or the company if necessary, note taking, photo taking, constitution of a paper and electronic file) then preparation of a resolution submitted to the Complaints Manager of the Region for approval. In case of complaints that could relate to sexual abuse or violence (committed to women and/or children), the Project will retain the services of an NGO specialized in these issues. The latter should be called upon to propose approaches and solutions adapted to this type of complaint.
- Communication of the proposed resolution to the complainant (by mail with additional explanations by telephone or verbally if necessary by the person in charge of complaints management within the Region) and information;
- If the complainant accepts the proposed resolution, closure of the signed complaint in the register and finalization / archiving of the paper file ;
- If the complainant does not accept the proposed resolution, communication of the complaint to the Mediation Committee.

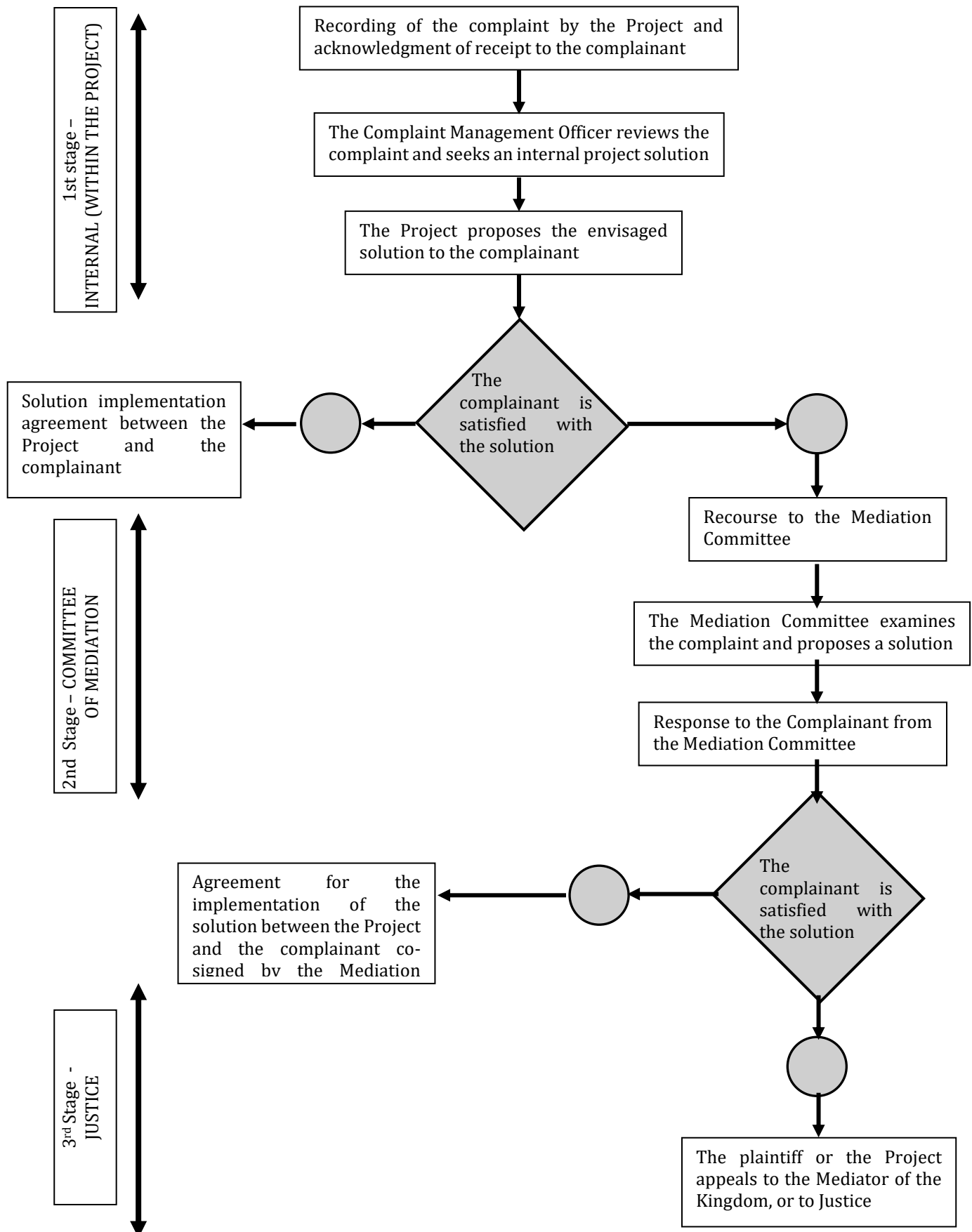
The stakeholders can submit their grievance directly at the Project premises, at the Region headquarters, through the Region websites, or by letter / email to the Grievance Mechanism Manager. All grievances and complaints will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant.

VI.3 Grievances processing times

Any registered complaint:

- Will give rise to a written acknowledgment of receipt within a maximum period of seven calendar days;
- Will give rise to a motion for a resolution (before any referral to the Mediation Committee) within a maximum period of thirty calendar days.

Figure 1 - Grievance mechanism



VII. Stakeholder Engagement and Grievances Monitoring & Reporting

VII.1 Consultation reports

All consultation actions, whatever their nature, will be the subject of reports. The paper minutes and attendance sheets will be archived in the office of the Region.

VII.2 Annual consultation and complaints management report

An annual action report will also be produced. This report will include, among other things, a summary of all the consultation actions carried out, with a summary of the main concerns raised by stakeholders and the responses given to them, as well as a categorization of complaints from stakeholders and a simple graphical representation of open, resolved and pending complaints with their quarterly evolution.