



# SINDH WATER AND AGRICULTURE TRANSFORMATION (SWAT) PROJECT



December 2025



## **GRIEVANCE REDRESSAL MECHANISM (GRM)**

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**AGRICULTURE DELIVERY UNIT (ADU)**  
**AGRICULTURE, SUPPLY & PRICES DEPARTMENT**  
**GOVERNMENT OF SINDH**

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## List of Abbreviations

|       |   |
|-------|---|
| CLO   | Community Liaison Officer                         |
| E&S   | Environmental & Social Safeguard                  |
| ESMP  | Environmental & Social Management Plan            |
| CESMP | Contractor Environmental & Social Management Plan |
| GRM   | Grievance Redressal Mechanism                     |
| FO    | Farmers Organization                              |
| GoS   | Government of Sindh                               |
| ADU   | Agriculture Delivery Unit                         |
| PMU   | Project Management Unit                           |
| SIDA  | Sindh Irrigation & Drainage Authority             |
| GRC   | Grievance Redressal Committee                     |
| SWAT  | Sindh Water & Agriculture Transformation Project  |
| GAP   | Gender Action Plan                                |
| PCMU  | Project Coordination and Project Management Unit  |
| P&DD  | Planning & Development Department                 |
| SH    | Sexual Harassment                                 |
| SEA   | Sexual Harassment & Abuse                         |
| GBV   | Gender Based Violence                             |
| PAPs  | Project Affected Persons                          |
| M&E   | Monitoring & Evaluation                           |
| GFPs  | Grievance Focal Points                            |
| MIS   | Management Information System                     |
| AMIS  | Agriculture Market Information System             |
| DSC   | Design & Supervision Consultant                   |
| SISC  | Subproject Implementation Support Consultants     |
| SAGP  | Sindh Agriculture Growth Project                  |
| OFWM  | On Farm Water Management                          |
| WB    | World Bank  |

# SINDH WATER AND AGRICULTURE TRANSFORMATION (SWAT) PROJECT AGRICULTURE DELIVERY UNIT (ADU)

## GRIEVANCE REDRESS MECHANISM (GRM)

### 1. Project Description

The Sindh Water and Agriculture Transformation (SWAT) project is a comprehensive initiative aimed at addressing the water and agricultural nexus in the Sindh province of Pakistan. The overarching theme of the project is to help boost Sindh's rural economy and tackle water-related environmental degradation.

The project is designed to increase agricultural water productivity, defined broadly as achieving more "rupee per drop." This aligns with the project's objective of helping Sindh derive much greater value from its agricultural sector while using less water through the adoption of climate-smart agriculture practices.

The Sindh Water and Agriculture Transformation (SWAT) Project consists of five key components and is being implemented by ADU, SIDA, and PCMU (P&D Department), Government of Sindh. However, the Agriculture Delivery Unit (Agriculture Department) is responsible for implementing the following components.

#### **Component 3-Agriculture Incentives & Investments**

##### Subcomponent-3.1 Integrated Development FO Areas

- i. 3.1.1 Improving Water Management at WCA Level*
- ii. 3.1.2 Climate Smart Agriculture (CSA)*

##### Subcomponent-3.2: Smart Subsidy for motivation of targeted crops

##### Subcomponent-3.3: Agriculture Information & Technology

- i. 3.3.1 Strengthening of Market Price Monitoring*
- ii. 3.3.2 Strengthening of Agriculture Extension Advisory System*
- iii. 3.3.3 Establishing an Integrated Water Logging and Salinity Program*
- iv. 3.3.4 Strengthening Sindh Crop Monitoring & Reporting*

##### Subcomponent-3.4: Developing Agriculture Value Chain

#### **Component 5- Flood Emergency Response Component**

## 2. Rationale

The Sindh Water and Agriculture Transformation (SWAT) Project is a multi-dimensional initiative encompassing a wide range of interventions. As an integrated program, it involves both the Sindh Irrigation and Drainage Authority (SIDA) and the Agriculture Department, each operating its own Grievance Redress Mechanism (GRM) process. The Project Coordination and Management Unit (PCMU) will facilitate both implementing agencies by establishing a high-level committee to address major grievances that require inter-agency coordination.

Within this structure, the Agriculture Delivery Unit (ADU) is responsible for implementing the GRM related to agricultural interventions under Components 3 and 5. The specific interventions, potential issues, and corresponding levels of responsibility for resolution are outlined in Table 1.

This large-scale project is being implemented across Sindh and involves a diverse range of stakeholders, including small and medium-sized farmers, tenants, women, laborers, equipment suppliers, and others directly or indirectly connected with the irrigated agriculture sector. Given the project's scope, a variety of issues and challenges may arise during its execution. Without a structured platform for expressing and resolving concerns, affected communities and stakeholders may resort to external means of protest, potentially increasing project-related risks. Conversely, unresolved or ignored grievances may lead to frustration and resistance over time.

### 2.1 Interventions under ADU/PMU

Table - 1

| # | Interventions   | Stakeholders   | Possible Issues   |
|---|---|--|---|
| 1 | a. Fresh lining of water course<br><br>b. Complete Lining of partially improved watercourses under different projects | Farmers. Tenants<br>WCA, Local<br>communities,<br>suppliers, women<br>workers/farmers    | Field staff/labour, Contractors, delays in work, temporary disruption to irrigation channels, quality of work, disbursement issues, alignment, gender based violence, labour under 18, unnecessary tree cutting |
| 2 | Rehabilitation of on-farm drainage  | Farmers, tenants,<br>adjacent land owners<br>WCA, suppliers,<br>women<br>workers/farmers | Field staff/labour, Contractors, delays in work, temporary disruption, connect to the existing drain channel, quality of work, disbursement   |

|   |   |  |  |
|---|---|--|--|
|   |   |  | issues, alignment, gender based violence, labour under 18, excessive tree cutting  |
| 3 | Installation of High Efficiency Irrigation System (HEIS)  | Farmers, suppliers, installation contractors, land owners    | Equipment malfunction, poor installation, delays in subsidy payments, delays in work, quality of work. Procurement issues,   |
| 4 | <p>a. Solar pumping system for High efficiency Irrigation system (HEIS)</p> <p>b. Solar system for already approved lift pumping machine at watercourses</p>  | Farmers, Contractors, equipment suppliers, local communities | Procurement issue, technical faults, inadequate training, eligibility disputes, favoritism, location issue   |
| 5 | Provision of Precision Laser Land Levelling Equipment   | Farmers, Contractors, equipment suppliers, local communities | Procurement issue, technical faults, inadequate training, eligibility disputes, favoritism, delays in subsidy payments   |
| 6 | <p>Establishment of CBFS</p> <p>Establishment of CSA demo Plots</p>   | Farmers, labour, suppliers                                   | Inadequate training, limited gender participation, delayed germination of crops or seedlings, poor germination rates, and failure to follow the appropriate cropping season  |
| 7 | Smart Subsidy Implementation Support and Operating  | Farmers, women farmers, tenants NGOs (if involved)           | Eligibility disputes, transparency issues, delayed subsidy disbursement, exclusion of marginalized crops   |
| 8 | <p>a. Rehabilitation and modernization of existing offices through renovation at head quarter/field levels/wholesale markets</p> <p>b. Establish &amp; rehabilitation/modernization of new &amp; existing</p> |  | Occupational safety, insurance, reimbursement, wedges, workers complaints, community complaints, workplace disruptions, health diseases, accommodation, environment related (Noise, dust, waste, exposure risk), stakeholders complaints, clean drinking water, sanitation, GBV & SE |

|    |  |  |   |
|----|--|--|---|
|    | <p>fertilizers and pesticides laboratories</p> <p>c. Modernization of District Soil &amp; Water Testing Laboratories (S&amp;WTLs)</p> <p>d. Establishment/Modernization of CESARR at Tando Jam</p> <p>e. Renovation of glass/screen house at SS&amp;RRI, Tando Jam</p> <p>f. Repair of Screen &amp; Green House [1200 sq.]</p> |  |   |
| 9  | Developing and implementing of agriculture value chain   | Entrepreneurs, supplier, farmers, tenants, local communities, contractors, women's | Delayed supply, pricing disputes, non-availability of climate resilient inputs, occupational safety, community health, inadequate training, exclusion of vulnerable groups, lack of inclusion for smallholders/women, environmental pollution (noise, dust, waste etc.), price manipulation |
| 10 | Flood emergency response component.  | Farmers, Hari, tenants, Land Owners  | Delayed subsidy disbursement, transparency, technical issues in IT program, eligibility disputes, delayed response  |

## 2.2 Objectives and Principles of the GRM

Following are main objectives and principals of the GRM:

- (i) To systematically process complaints received from the Project Affected Persons (PAPs) and other stakeholders and provide a prompt, transparent and fair response and resolution without reprisals;
- (ii) To provide project staff with practical suggestions/feedback that allow them to be more accountable, transparent, and responsive to beneficiaries;
- (iii) Increasing stakeholder involvement in the project.
- (iv) To train staff of the project so as to handle grievances effectively and amicably.
- (v) To redress all types of grievances including technical, social, environmental, procurement and financial management aspects of the project.
- (vi) The proposed GRM should ensure responsiveness at all level of complaint handling and confidentiality to the PAPs regarding their complaints.
- (vii) The GRM is expected to address different types of complaints such as Compensation, Environmental issues (e.g. noise, pollution, solid waste management, flora/fauna, etc.); Social issues (Exclusion, Inclusion); Gender Based Violence (GBV), Sub projects sites selections, Farmer's organization, Women farmers, Procurement & Financial and others.

## 3. GRM Structure:

The ADU Grievance Redress Mechanism (GRM) has been established and is being implemented through a three-tier system covering all agriculture interventions, including civil works. Grievance Redress Committees (GRCs) have been constituted at three levels the ADU, the respective Agriculture Directorates, and the PCMU.



### 3.1 GRM Handling Hierarchy:

*Figure-I indicates the hierarchy for handling grievances*

#### GRC-I (PCMU level)

1. Project Coordinator (PC) (Chairman)
2. Project Director (PD) ADU/PMU
3. Project Director (PD) SIDA
4. Environmental and Social Safeguard Specialist (PCMU)
5. Coopted Member

#### GRC-II (Project level/ADU)

1. Program Implementation Advisor (PIA) (Chairman)
2. Relevant Component Specialist
3. SISC/DSC
4. Social & Gender Specialist
5. Relevant Focal Person

#### GRC-III (District Level)

1. Dy. Director/Additional Director-OFWM/Agri Extension/Agri Research/Agri Marketing of respective district
2. SISC/DSC Representative
3. SGS (Member Secretary)
4. Concerned FO representative
5. Contractor Representative

#### GRC-III (District Level)

1. Dy. Director/Additional Director-OFWM/Agri Extension/Agri Research/Agri Marketing of respective district
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5. Contractor Representative

The different GRM forums their roles and responsibilities are described below;

#### **Grievances Redressal Committee I:**

|      |  |          |
|------|--|----------|
| i.   | Project Coordinator (PC) (PCMU)                  | Chairmen |
| ii.  | Project Director ADU/PMU                         | Member   |
| iii. | Project Director SIDA                            | Member   |
| iv.  | Environment & Social Safeguard Specialist (PCMU) | Member   |
| v.   | Coopted Member                                   | Member   |

The GRC I will act as the apex forum to hear and judicature on appeals against GRC II and GRC III forums. The forum will be chaired by PC-PCMU and his/her office will serve as the secretariat of GRC-I. Appeals must be lodged by the aggrieved parties as per prescribed procedure.

The GRC-I mandate includes but is not limited to:

- I. Resolve and address complaints that fall within the mandate of the project level.
- II. Review appeals submitted against the decisions of GRC-II and GRC-III.
- III. Examine and determine corrective measures based on comments, feedback, and recommendations received from lower-level GRCs.
- IV. Monitor the functioning of GRM processes handled by GRC-II and GRC-III and review the resolutions proposed by them.
- V. Notify and confirm the composition of GRC-I.
- VI. Analyze grievance-related data to support evidence-based decision-making.
- VII. Constitute special committees, when required, to address grievances of an urgent or exceptional nature, or cases needing detailed inquiry.
- VIII. The decisions of GRC-I shall be final and binding on all parties.

#### **Grievances Redressal Committee II:**

|      |                                      |          |
|------|--------------------------------------|----------|
| i.   | Program Implementation Advisor (PIA) | Chairmen |
| ii.  | Relevant Component Specialist        | Member   |
| iii. | SISC\DSC Representative              | Member   |
| iv.  | Social & Gender Specialist ADU       | Member   |
| v.   | Relevant Focal Person                | Member   |

The GRC-II is established at the ADU office to address grievances received at the ADU level, including those escalated from GRC-III that remain unresolved/appeal filed against the decision of GRC-III. If a grievance cannot be resolved at the ADU level within the stipulated 30-days period—despite all reasonable efforts—the case will either be retained for an additional 15 days (with the prior consent of both the Project Director and the complainant) or forwarded to the GRC-I for further resolution. The decision will

be based on the committee's assessment of the most effective option for timely and fair settlement.

GRC-II will function as a dedicated body to ensure that the grievance redress process remains transparent, effective, and efficient. The committee will consist of the designated Chairperson and relevant members as outlined in figure 1.

#### Responsibilities of GRC-II

1. The Social & Gender Specialist shall be the focal person for GRC-II, which is responsible for logging the complaint and date of receipt onto the complaint database and informing the Chairman, Relevant specialist, and focal person.
2. The GRC-II will coordinate with complainant/aggrieved parties to receive project level complaints made directly to them.
3. The GRC-II shall review, consider and resolve grievances related to project interventions during implementation of the project activities
4. The focal person with GRC-II, is responsible for investigating the complaint to determine its validity and assess whether the source of the problem is due to project activities and identifying appropriate corrective measures. If corrective measures are necessary, GRC-II, through the technical specialists/relevant focal person, will decide the matter based upon documentary evidences and circumstantial facts
5. Considering and determining corrective measures in the light of recommendations and suggestions received by GRC-III.
6. Maintain an updated online GRM database/Complaints Log.
7. The GRC-II will act as an appellant forum against the decision of GRC-III, if desired by the aggrieved parties upon receiving formal appeal as per prescribed procedure.

The GRC-II mandate includes but is not limited to:

- IX. Resolve and address complaints categorized for redressal at the district level.
- X. Review and determine corrective measures based on recommendations and suggestions received from GRC-at the district level.
- XI. Monitor the implementation and effectiveness of the GRM at the district level.
- XII. Analyze grievance-related data to support evidence-based decision-making.
- XIII. Report unresolved grievances to GRC-I for further action.
- XIV. Constitute special committees, when required, to address urgent grievances or complaints that necessitate comprehensive investigative procedures.

### **Grievances Redressal Committee III:**

|      |  |                    |
|------|--|--------------------|
| i.   | Dy. Director-OFWM/<br>Agri Extension/ Agri Research/ Marketing | Member             |
| ii.  | SISC/DSC Representative  | Member             |
| iii. | SGS  | (Member Secretary) |
| iv.  | Concerned FO representative                                    | Member             |
| v.   | Contractor Representative                                      | Member             |

The GRC-III is established at the district level to manage and resolve grievances arising from subproject activities. The Community Liaison Officer (CLO), appointed by the subproject implementation partners (DSC/SISC/Contractors), serves as the Focal Person/Convener of the GRC-III. The CLO is responsible for registering grievances and maintaining all records in both a physical grievance register and an electronic database.

Grievances may be submitted to the CLO verbally or in writing, and the CLO will further share them with the Social & Gender Specialist ADU for review and guidance. The social & gender specialist ADU will issue instruction to take up the grievance with relevant GRC-III. The CLO records all complaints in the grievance register, updates the information regularly, and submits the monthly grievance report and database to the GRC Member Secretary for consolidation and further review.

At the district level, consultants, contractors, relevant field managers, and concerned Additional Directors/Deputy directors are responsible for addressing and resolving grievances through their respective GRCs. If any grievance remains unresolved at the GRC-III level, it will be formally forwarded in writing to the Chairperson of GRC-II for further action or the aggrieved party may approach the GRC-II as per prescribed procedure.

### **Responsibilities of GRC-III**

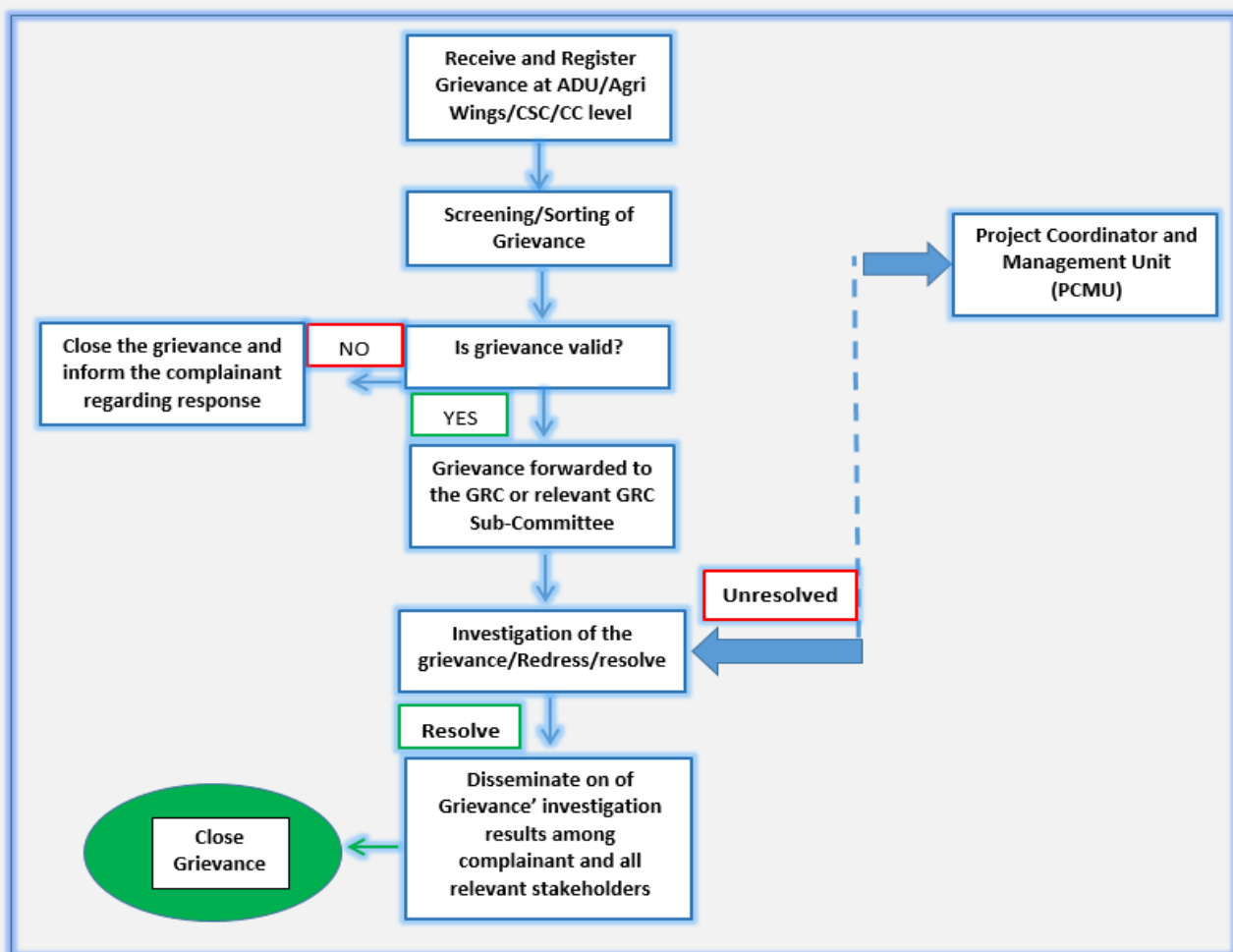
1. Review, consider, and resolve grievances at the field/site level.
2. Conduct fact-finding investigations related to grievances.
3. Resolve grievances within one week of receipt.
4. Analyze grievance data to support informed decision-making.
5. Ensure confidentiality upon complainant's request.
6. Maintain an updated GRM Complaints Log/database for recordkeeping and reporting to WB and other relevant authorities.
7. The Focal Person and the Social & Gender Specialist of the ADU will disseminate public notices within subproject areas to inform communities about the Grievance Redress Mechanism (GRM) and its procedures.
8. Prominent signage displaying GRC contact details in the Sindhi language will also be installed at each subproject implementation site to ensure accessibility and awareness for all stakeholders.

The GRC-III mandate includes but is not limited to:

- I. Resolve and address complaints categorized for redressal at the district level
- II. Consider and determine corrective measures based on the recommendations provided by members of GRC-III.
- III. Monitor the functioning and effectiveness of the GRM at the district level.
- IV. Analyze grievance data to support informed and evidence-based decision-making.
- V. Report unresolved grievances at the district level to GRC-I for further action.
- VI. Constitute special committees, when required under unusual circumstances, for the redressal of urgent grievances and/or resolution of complaints requiring broader investigative procedures.

### 3.2 Grievance Handling Process:

The key steps in handling the grievances are summarized in Figure 2 and described below.



**Figure-II ADU/PMU GRM Process Flow**

#### **4. Grievance Redress Mechanism for GBV and SEA/SH:**

Grievance Redress Mechanisms (GRM) will integrate mechanisms to track complaints related to SEA/GBV, including a feedback system for regular and timely feedback on actions taken to respond to complaints. These mechanisms will protect confidentiality of individuals without compromising access to justice. Grievances related to GBV and SEA/SH will always be escalated to the ADU and will be dealt with by the ADU designated Gender specialist. Grievances related to GBV and SEA/SH will be forwarded to the staff specifically trained to handle these types of complaints. The Social Safeguard & Gender Specialist (as Focal Person) at the ADU will receive the necessary training to handle such sensitive cases. The GRC will develop specific procedures to ensure complainants are able to register their grievances anonymously, and in a survivor-centered and discreet manner.

#### **5. Receipt and Registration of Grievances:**

The receipt of complaints is key and hence a simple and understandable procedure is adopted for receiving grievances, suggestions and comments relating to the project. The complainant may submit, containing his/her personal information, suggestions and/or comments on the prescribed form or simple paper, to the Focal Persons of Grievance Redress Committee-II and III at (i) ADU Office, (ii) Additional/Deputy Directors of concerned wings of the Agriculture Departments. In case the concerned Focal Person is not available in the office the Aggrieved Person/Complainant can drop his/her written complaint, suggestion/comments in a Box placed at a visible location for the purpose.

Alternatively, grievances may be submitted by (i) filing an application on the Project website ([www.swatagriculture.gos.pk](http://www.swatagriculture.gos.pk)), (ii) lodging complaints through cellphone number (0311-1646111) or (iii) use of the postal mail service office of the Deputy Director respective Agriculture Wings at district headquarters of Sukkur, Khairpur, Ghotki, Sanghar, Mirpurkhas, Umerkot, Hyderabad, Tando Muhammad Khan & Badin.

The Project will ensure that any person either in his personal capacity or representing a group of complainants and/or entity that files a grievance will be made aware of the grievance mechanism. To facilitate tracking, evaluation and response to grievances, a standardized form will be used (Annexure-A). Complainants are encouraged to use this form that will be available at every office/outlet mentioned above or website of the project.

A project GRM awareness campaign will be launched in print and electronic media. This will include distribution of brochures (in local languages), signboards in the vicinities where project interventions will be executed and in print media. The contents of these hoardings may include but not limited to the following:

- Summary of the GRM procedure and how it can be used
- Details of the process, such as who is responsible for receiving and responding the grievances etc.
- Timeline for receiving responses and results
- Safeguards in place to ensure confidentiality

All grievances, suggestions/comments etc. will be recorded in a Grievance Register by the Focal Person(s) / Complaint Handling Officer. A unique number will be assigned to each grievance, suggestions and comment. In addition to lodging the grievance/suggestion/comment in the Grievance Register, the same shall also be uploaded in a dedicated data base to be maintained at Project Web Portal, which can only be accessed by Project Director or any of his assigned representative.

### 5.1 Acknowledging Grievance:

The Focal Person or Complaint Handling Officer will formally acknowledge the receipt of grievance within five working days of the submission of grievance and will inform the complainant that the Project will respond within 15 working days. It will be ensured that all such acknowledgements, verbal or written are recorded in an appropriate manner to ensure record of correspondence. Acknowledgments should include a summary of the grievance and an estimated time for response/resolution.

### 5.2 Screening/Sorting of Grievances/Suggestions/Comments:

Each and every complaint received in writing or through SMS, WhatsApp, Messenger or verbal channels will be sorted out from Level 1 to 3 as per definitions provided in Table 2 to determine the appropriate method of Redress.

Table 2. Complaint levels and response process

| Levels         | Description   | Type of Request | Authority for Redress | Authority for Appeal |
|----------------|---|-----------------|-----------------------|----------------------|
| District Level | 1. Complaints Regarding E&S Matters   | Complaint       | GRC-III               | GRC-II               |
|                | 2. Complaint regarding quality of work / delays   | Complaint       | GRC-III               | GRC-II               |
|                | 3. Complaint regarding field staff/Contractor under civil works & Agriculture Interventions | Complaint       | GRC-III               | GRC-II               |
|                | 4. Temporary disruption/ local communities  | Complaint       | GRC-III               | GRC-II               |
|                | 5. Complaint pertaining to formation of WCA / beneficiary selection / site selection for    | Complaint       | GRC-III               | GRC-II               |

|                    |   |                     |         |        |
|--------------------|---|---------------------|---------|--------|
| Project Level /ADU | agriculture interventions under SWAT  |                     |         |        |
|                    | 6. Occupational Safety/ Environmental issue (Noise. Dust, Waste, exposure risk, Excessive Tree cutting) | Complaint           | GRC-III | GRC-II |
|                    | 7. Complaint Regarding Field Staff / Contractors / Farmers  | Complaint           | GRC-III | GRC-II |
|                    | 8. Complaints regarding delays in work  | Complaint           | GRC-III | GRC-II |
|                    | 9. Complaints regarding WC length, alignment, parameters , design , specification                       | Complaint           | GRC-III | GRC-II |
|                    | 10. Suggestions/Comments on implementation arrangements of the project                                  | Complaint           | GRC-III | GRC-II |
|                    | 11. Grievance arising due to construction   | Complaint           | GRC-III | GRC-II |
|                    | 12. Suggestions / comments  | Suggestions         | GRC-III | GRC-II |
|                    | 1. Complaint against harassment like GBV/SEA/SH   | Complaint           | GRC-II  | GRC-I  |
|                    | 2. Complaint against Equipment supplier, Stakeholders, Entrepreneurs                                    | Complaint           | GRC-II  | GRC-I  |
|                    | 3. Complaints from Farmer Organization  | Complaint           | GRC-II  | GRC-I  |
|                    | 4. Complaint against Contractor   | Complaint           | GRC-II  | GRC-I  |
| Project Level /ADU | 5. Complaint against ADU Staff and consultants  | Complaint           | GRC-II  | GRC-I  |
|                    | 6. General complaint regarding procurement issues / quality of work / disbursement issues               | Complaint           | GRC-II  | GRC-I  |
|                    | 7. Complaints submitted by ADU/PIU Staff pertaining to personal matters/issues                          | Complaint           | GRC-II  | GRC-I  |
|                    | 8. ADU Staff complaints   | Complaint           | GRC-II  | GRC-I  |
|                    | 9. Complaint against delayed in subsidy/ Eligibility disputes/transparency issues                       |                     | GRC-II  | GRC-I  |
|                    | 10. Complaint regarding procurement of goods and services and staff                                     | Complaint           | GRC-II  | GRC-I  |
|                    | 11. Complaint pertaining to malpractice by contractor/ ADU and/or consultants                           | Complaint           | GRC-II  | GRC-I  |
|                    | 12. Comments and suggestion regarding Implementation of   | Suggestion /Comment | GRC-II  | GRC-I  |



|  |               |  |  |  |
|--|---------------|--|--|--|
|  | interventions |  |  |  |
|--|---------------|--|--|--|

Once the sorting of all the relevant/maintainable grievances/suggestions and comments have been made, the Focal Person / Complaint Handling Officer will send the complaint / suggestion / comment to the concerned committee for redress.

### 5.3 Verification of Complaint/Investigation/Redress

Once a complaint and/or suggestion / comment has been forwarded to the relevant GRC , the Chairperson of the Committee will nominate a committee member to verify the issue and/or analyze the suggestion / comment prior to a thorough investigation, and to prepare a working paper for consideration of the Committee / Sub-Committee in its meeting. The investigations will include collecting and review of relevant documents, making site visits, consulting appropriate internal staff, contacting external stakeholders, interviewing the complainant as appropriate.

The Committee and Sub-Committee will meet as often as required to handle complaints and suggestions. The GRC and its Sub-Committee will ensure attendance of complainants at meetings as observers to ensure transparency.

The District level committee, in case of complaints pertaining to social and tribal issues / conflict, may redirect complaints for Redress through local prominent elders and social set-ups if required, or they may invite such tribal elder to their meetings for facilitation and assistance.

### 5.4 Right of Appeal

If a complainant is dissatisfied with and/or unwilling to accept the resolution of the relevant GRCs (GRC-II & III), he/she may approach the appellate forum for review. The appeal committees will review the case and determine if further action is possible. Once all options for corrective actions have been explored and no further action is deemed appropriate, a written notice will be sent to the complainant advising that his/her grievance case is closed.

## 6. Reporting and Monitoring:

The Grievance Redress (GR) Cell will document and register all concerns and grievances raised by Project Affected Persons (PAPs) at the site level, including those related to agricultural interventions and civil works. The ADU Gender Specialist will be responsible for managing complaints related to Gender-Based Violence (GBV) and Sexual Exploitation, Abuse, and Harassment (SEA/SH) at the project level.

The Agriculture Delivery Unit (ADU) will develop specific confidential reporting procedures to ensure that complainants can register grievances discreetly and safely.

The GRC will maintain a detailed record of all complaints, including the nature of the grievance, actions taken, investigation outcomes, and resolution status. These records will be integrated into the Monthly/Bi-Annual Environmental and Social Monitoring Reports, Contractor's Monthly Progress Reports, and Subproject Implementation Consultant/Design and Supervision Consultant reports.

During the construction and initial operational phases, the ADU will periodically report grievance-related progress and outcomes to the World Bank as part of loan covenant requirements.

The tracking and documentation of grievance resolutions within the ADU-level GRC will include the following elements:

- i. **Tracking Forms and Procedures:** Standardized formats for collecting information from project personnel and complainants, ensuring completeness and accuracy.
- ii. **Computerized Database:** A secure, regularly updated digital database managed by designated staff to log, track, and monitor grievances.
- iii. **Data Analysis and Reporting System:** Tools and processes to analyze grievance trends, identify recurring issues or systemic causes, ensure transparency, and evaluate the overall effectiveness of the mechanism.
- iv. **Stakeholder Communication:** Regular updates provided to complainants and relevant stakeholders regarding the progress and status of their case.
- v. **Data Retrieval for Reporting:** Procedures to extract and compile data for periodic reporting to the PMU and GRC, including integration into Monthly/Bi-Annual ESMP Compliance Reports submitted to the World Bank.
- vi. **Annual Review:** An annual qualitative and quantitative assessment of all grievances received, filtered by parameters such as gender, type of complaint, resolution status, time to closure, intake channel, and project location, to evaluate system performance and identify areas for improvement.
- vii. **Confidentiality and Non-Retaliation:** All grievance information, particularly related to GBV/SEA/SH cases, will be treated with strict confidentiality, ensuring protection of complainant identity and adherence to the survivor-centered approach.

## **7. Dissemination**

Once the redress process is completed and the GRC and/or GR Sub-Committee has reached a conclusion, the result will be communicated to the complainant and concerned stakeholders. The results of the redress process will be uploaded to the project website. Besides communicating the results to the Complainant, the Focal Person(s) / Complaint Handling Officer will also record the information pertaining to the decisions of the Committee(s) in the grievance register and corresponding grievance database. The actions suggested by the GRC or Sub-Committees will be communicated to the concerned person(s) and will be recorded in a register. ADU will keep records of all and unresolved complaints and grievances and make them available for review as and when asked for by the World Bank and other interested entities/persons. Additionally, prominent signage displaying the GRC's contact details in the local language will be installed at each subproject implementation site.

## **8. Capacity Building & Training:**

The capacity to handle grievances effectively is an essential aspect of a good GRM. Capacity refers not only to providing training for and building the skills of the GRM implementers staff, but also to a range of other capabilities for which a mechanism should be set in place to facilitate and promote effective service delivery. The training/orientation programs may include the following:

- ✓ Procedural training on receiving, registering, and sorting grievances;
- ✓ Conduct of initial grievance assessments;
- ✓ Effective communication, negotiation, and facilitation skills;
- ✓ Techniques for problem solving, dispute resolution, and grievance handling
- ✓ Documentation and reporting.

**Annexure-A****Sample Grievance /Suggestion/Comment Recording Form**

|  |  |  |
|--|--|--|
| <b>Date:</b>   | <b>Time:</b>   | <b>Location:</b>   |
| <b>Name</b>  | <input type="checkbox"/>   | You can use my personal detail   |
| <b>Address</b>   | <input type="checkbox"/>   | You can use my name when talking about this complaint in community meetings and project meetings |
| <b>Contact No.</b>   | <input type="checkbox"/>   | I do not want to disclose my name  |
| <b>Alternative Contact</b>   | <input type="checkbox"/> I would want the following trusted individual to pursue my complaint on my behalf<br>Name: _____ Contact: No. _____ |  |
| <b>Method to Contact you</b>   | <input type="checkbox"/> By mail:<br>Mailing address: _____  |  |
|  | <input type="checkbox"/> By Phone/Mobile Phone<br>_____  |  |
|  | <input type="checkbox"/> By Email:<br>_____  |  |
|  | <input type="checkbox"/> I would like to pick up responses in person from Office<br>1. DD<br>2. Director Upper/ Lower                        |  |
| <b>Supporting Documents</b>  | Written Documents  | Photocopies of Document  |
|  | Photographs  | Other  |
| <b>Brief Description<br/>(What happened?<br/>Who Was Involved?<br/>Who did it happen to?<br/>What are your<br/>suggestions? (Use<br/>additional pages if<br/>required)</b> |  |  |
| <b>Signature of the Claimant</b>   |  | <b>Date</b>  |
| <b>For Office Use Only</b>   |  |  |
| <b>Grievance Involves</b>  |  |  |
| Environmental concerns   | Social safeguard Issue   |  |
| Procurement  | damages  |  |
| Human Rights   | Personal issues/ WCA related issues  |  |
| Issues concerning delays   | Quality issues   |  |
| <b>Comments and Suggestions</b>  |  |  |
| Project Design   | Environmental, Social or Resettlement  |  |
| Design /Selection of beneficiaries   | Human Resource   |  |
| Beneficiary handling   | Other  |  |

**Annexure-B****Grievance Recording Register**

| # | Date | Time | Mode of submission | Level and Type of Complaint | Proposed actions |
|---|------|------|--------------------|-----------------------------|------------------|
|   |      |      |                    |                             |                  |