



REC CAUCASUS

## THE REGIONAL ENVIRONMENTAL CENTRE FOR THE CAUCASUS

### Document Type

### Executive Order

Executive orders are signed documents, numbered consecutively, through which the Executive Director manages the operations of the REC Caucasus Office

*Ref.: Executive Order No.01/08-2023-RECC of 01 March, 2023*

## Executive Order No. 01/08-2023-RECC

### Establishing REC Caucasus Project-Level Grievance Redress Mechanism (GRM) for the GEF Financed Project “Sustainable Management of Agricultural Biodiversity in Vulnerable Ecosystems and Rural Communities of Samtskhe-Javakheti Region in Georgia”

**Place:** Tbilisi, Georgia

**Date:** 01 March, 2023

The Regional Environmental Centre for the Caucasus (*hereinafter referred to as “REC Caucasus”*) in partnership with the United Nations Environment Programme (*hereinafter referred to as “UNEP”*), is involved in implementation of the GEF Financed Project (*GEF Project ID: 10829*) “Sustainable Management of Agricultural Biodiversity in Vulnerable Ecosystems and Rural Communities of Samtskhe-Javakheti Region in Georgia” (*hereinafter referred to as “Project”*).

With the above regard, UNEP (*as GEF Implementing Agency*) and REC Caucasus (*as Project Executing Agency*) in October, 2022 signed **Project Cooperation Agreement** (*hereinafter referred to as “PCA”*) for implementation of the Project “Sustainable Management of Agricultural Biodiversity in Vulnerable Ecosystems and Rural Communities of Samtskhe-Javakheti Region in Georgia”.

This Agreement governs the implementation by the REC Caucasus of the Project as defined in the PCA. It also describes the relationship between the REC Caucasus and UNEP and their responsibilities.

**Headquarters**  
48/50 Mtskheta Str.  
0179 Tbilisi, Georgia  
E-Mail: [info@rec-caucasus.org](mailto:info@rec-caucasus.org)  
[www.rec-caucasus.org](http://www.rec-caucasus.org)

Pursuant to the Approved CEO Endorsement Document (*PCA Appendix 1*) the **Project Level Grievance Mechanism** shall be establishment of for any complaints to be handled swiftly at the project level.

According to the Approved CEO Endorsement Document (*PCA Appendix 1*) the Project belongs to the *low risk project category*; though the Project (particularly component 2) would require attention on potential safeguard issues and project's potential impact to the labor and working conditions – referring further to the UNEP's Environmental and Social Sustainability Framework (ESSF)<sup>1</sup> guiding principles - resilience and sustainability; human rights, gender equality and women empowerment, accountability and leave no one behind – that are still applicable for low risk projects.

**THEREFORE**, in order to form REC Caucasus **Project-level Grievance Redress Mechanism (GRM)** early enough during the Project inception phase, to ensure availability of contact information and information on the process to file a complaint, by the authority vested in me as Executive Director of REC Caucasus and as Head of the Project Team at REC Caucasus (Project Director) under the provisions of the PCA, it is hereby ordered as follows:

**Section 1. Establishment of Grievance Redress Mechanism (GRM).** There is established, effective 01 March, 2023, REC Caucasus Project-level Grievance Redress Mechanism (GRM) – Project-level Operational GRM Procedures for the GEF funded Project “Sustainable Management of Agricultural Biodiversity in Vulnerable Ecosystems and Rural Communities of Samtskhe-Javakheti Region in Georgia” approved by the Executive Director of REC Caucasus (*see in attached Appendix*).

**Section 2. Focal Point.** Having regard to alternative nominations prepared in advance, level of their direct involvement in the Project implementation, working capacities and reediness of nominated candidates to serve voluntarily as Focal Point for the Project Grievance Redress Mechanism (GRM), the Focal Point for the Project Grievance Redress Mechanism (GRM) shall be:

Mr. **David Mironidze** – REC Caucasus Financial Manager  
(*Project Financial Officer – Member of the REC Caucasus Project Team*)

**Section 3. Mandate of Focal Point.** Mandate of the Focal Point is defined by the REC Caucasus Project Grievance Redress Mechanism (GRM) – *see in Appendix*.

**Section 4. Responsibilities of Focal Point.** Responsibilities of the Focal Point shall be as follows:

**4.1.** Serving as a member of Focal Point for the GRM means that the Focal Point is entrusted with a great deal of responsibility on behalf of the REC Caucasus to conscientiously maintain the Project Grievance Redress Mechanism (GRM).

**4.2.** Focal Point can be frequently required to devote considerable time in reading GRM related documentation. Acceptance of an invitation to serve as GRM Focal Point should be construed as a commitment, within reasonable limits, to expend the time necessary to implement and maintain the GRM.

<sup>1</sup> UNEP's Environmental and Social Sustainability Framework – ESSF (2020). United Nations Environment Programme (UNEP).  
<https://wedocx.unep.org/handle/20.500.11822/32022>

**4.3.** Agreeing to serve as Focal Point for the GRM, the Focal Point also agreeing to render a fair, impartial evaluation and affirming to perform such an evaluation to the best ability without prejudice or bias, either for or against any individual complainant or category of complainant.

**4.4.** The Focal Point for the GRM is responsible for coordinating the GRM and keeping of the GRM Register at REC Caucasus.

**Section 5. Replacements.** REC Caucasus Executive Director will appoint a replacement Focal Point for GRM to prevent delays in case of unpredictable unavailability.

**Section 6. Expiration.** The GRM and Focal Point for GRM shall terminate upon the termination of the PCA.

*Appendix:* REC Caucasus Grievance Redress Mechanism (GRM)

**Sophiko Akhobadze**  
Executive Director  
REC Caucasus



## **Appendix**

*of the Executive Order No.01/08-2023-RECC of 01 March, 2023*



## THE REGIONAL ENVIRONMENTAL CENTRE FOR THE CAUCASUS

*Approved by the REC Caucasus Executive Order  
No.01/08-2023-RECC of 01 March, 2023*

## REC CAUCASUS GRIEVANCE REDRESS MECHANISM (GRM)

### PROJECT-LEVEL

*Project-level Grievance Redress Mechanism (GRM) Operating Procedures  
for Implementation of the GEF funded Project “Sustainable Management  
of Agricultural Biodiversity in Vulnerable Ecosystems and Rural  
Communities of Samtskhe-Javakheti Region in Georgia”*

*(GEF Project ID: 10829)*

*March 2023*

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## Section I. Introduction and Background

### Outset Situation

1. The Regional Environmental Centre for the Caucasus (*hereinafter referred to as “REC Caucasus”*) in partnership with the United Nations Environment Programme (*hereinafter referred to as “UNEP”*), is involved in implementation of the GEF Financed Project (*GEF Project ID: 10829*) “Sustainable Management of Agricultural Biodiversity in Vulnerable Ecosystems and Rural Communities of Samtskhe-Javakheti Region in Georgia”<sup>1</sup> (*hereinafter referred to as “Project”*).
2. With the above regard, UNEP (*as GEF Implementing Agency*) and REC Caucasus (*as Project Executing Agency*) in October, 2022 signed **Project Cooperation Agreement** (*hereinafter referred to as “PCA”*) for implementation of the Project “Sustainable Management of Agricultural Biodiversity in Vulnerable Ecosystems and Rural Communities of Samtskhe-Javakheti Region in Georgia”. This Agreement governs the implementation of the Project by the REC Caucasus as defined in the PCA. It also describes the relationship between the REC Caucasus and UNEP and their responsibilities.
3. Under the Project it is envisaged to enable a transformative shift towards sustainable management of agricultural biodiversity in vulnerable ecosystems and rural communities of Samtskhe-Javakheti Region by mainstream agrobiodiversity conservation into agriculture sector.
4. Project consists of three subsequent components: (1) Policy and Regulatory/Institutional, (2) Demonstration and (3) Capacity Building/Knowledge Management and associated outcomes.
5. The Project has been designed as a package of technical and institutional capacity building measures. It will contribute to Aichi Biodiversity Target 13, which aims to develop and implement strategies to minimize genetic erosion and safeguard genetic diversity. Consequently, this would contribute to accomplishing other Aichi Biodiversity Targets including sustainable production and consumption (Aichi Target 4), sustainably managed agriculture (including aquaculture and forestry) (Aichi Target 7) and fully integrated and respected traditional knowledge, innovations, practices, and customary use of biological resources (Aichi Target 18).
6. The Project will deliver the following outcomes:
  - *Outcome 1.1: Adoption of new policies integrating sustainable management of agricultural biodiversity with the focus on adapted wild edible plants (vine and wheat varieties).* This Outcome is one of the main outcomes of this project intending to put in place agricultural biodiversity policy and regulatory framework that will foster development of sustainable agricultural biodiversity conservation and utilization local programs and biodiversity stewardship agreements for agriculture and tourism sectors with the focus on adapted wild edible plants (vine and wheat varieties) and further promotion of their implementation.
  - *Outcome 2.1: Increased area devoted to sustainably managed agricultural biodiversity through*

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<sup>1</sup> Project Sustainable Management of Agricultural Biodiversity in Vulnerable Ecosystems and Rural Communities of Samtskhe-Javakheti Region in Georgia (2023-2026) / (*GEF Project ID: 10829*).  
<https://www.thegef.org/projects-operations/projects/10829>

*mainstreaming of diversified practices and products in Samtskhe-Javakheti Region enhancing resilience to climate change.* Outcome 2.1 will be achieved through implementation of the five results based outputs aimed at conducting of: Field-based surveys and mapping of the distribution of wild populations of the targeted crop (vine and wheat varieties); Establishing of two nurseries and field seed banks to manage and multiply seeds and seedlings of wild edible plants (vine and wheat varieties) based on the results of the field-based surveys; Identification, planning and implementation of participatory and sustainable management practices on at least 6 pilot sites (in total on land area of 500 ha), including establishment of pilot nursery sites, that will support traditional crop varieties of adapted wild edible plants to improve local diversity for marginal environments in the project site pilot locations; Enhancing skills and capacities of farmers and local communities in the project pilot sites to undertake agricultural biodiversity friendly farming and other relevant agricultural biodiversity friendly practices, and community-based approaches through on-job trainings; Developing agro-eco tourism attractions as an alternative way of sustainable development in the selected communities of the Samtskhe-Javakheti Region (rural agrotourism, tourism and organic agriculture, activity tourism- grape harvesting and processing).

- *Outcome 2.2: Increased availability of agricultural biodiversity friendly products and improved marketing opportunities for target plants and derived products through government support and promotion of agro-ecotourism in Samtskhe-Javakheti Region.* Outcome 2.2 will be achieved by putting in place five results based outputs, such as: Analyses on value addition and creation of new products and branding opportunities based on wild edible plants (vine and wheat varieties) for Samtskhe-Jvakheti region; Marketing research through a supply chain approach for agricultural biodiversity friendly products; Income generation options (bankable projects) through the sustainable production, processing and marketing of agrobiodiversity friendly foods with high nutritional value for low-income rural producers identified and supported with sound economic and financial analysis; Agrotechnical Guidelines for sustainably managing and harvesting priority plants and products and Farmer information system for agricultural biodiversity friendly farming.
- *Outcome 3.1: Stakeholders apply their increased capacity and knowledge and take actions on sustainable management of agricultural biodiversity.* This Outcome will concentrate on implementation of activities related to national capacity development to mainstream and promote agricultural biodiversity and agritourism in agricultural production and agrotourism - including capacity development within Georgia's agricultural extension service and government agencies to promote diversified agriculture that integrates the cultivation of wild edible plants (vine and wheat varieties).

## General Requirements

7. REC Caucasus project-level GRM is defined at the Project inception phase along with focal point designated and communicated to the stakeholders to ensure that people affected by the project can file a complaints, in accordance with these operational procedures.
8. REC Caucasus is committed to ensuring that the Project is implemented in accordance with the REC Caucasus environmental and social obligations. In order to better achieve these goals, and to ensure that beneficiaries of the Project have access to an effective and timely mechanism to address their concerns about non-compliance with these obligations, the Organization, in order to supplement measures for receiving, reviewing and acting as appropriate on these concerns at the program management level, has entrusted the UNEP-Europe Office with the mandate to independently review



the complaints that cannot be resolved at that level. In turn, UNEP-Europe Office will facilitate the resolution of concerns of beneficiaries of UNEP programs regarding alleged or potential violations of UNEP's social and environmental commitments. For this purpose, concerns must be addressed at the closest appropriate level, i.e. at the project management/technical level (*Project Director*), and if necessary at the UNEP-Europe Office level (*Project Task Manager*) - if a concern or grievance cannot be resolved through consultations and measures at the project management level at REC Caucasus.

9. The principles to be followed during the complaint resolution process include: impartiality, respect for human rights, including those pertaining to compliance of national norms, coherence with the norms, equality, transparency, honesty, and mutual respect.

## Section II. Description

### Project-level Grievance Mechanism

10. The project will establish a grievance mechanism at field level to file complaints during project implementation. Contact information and information on the process to file a complaint will be disclosed in all meetings, workshops and other related events throughout the life of the project. In addition, it is expected that all awareness raising material to be distributed will include the necessary information regarding the contacts and the process for filing grievances.
11. The project will also be responsible for documenting and reporting as part of the safeguards performance monitoring on any grievances received and how they were addressed.

### REC Caucasus Focal Point for the Project-level Grievance Redress Mechanism (GRM)

12. The Focal Point for the Project Grievance Redress Mechanism (GRM) is appointed by the Executive Order of the REC Caucasus No.01/08-2023-RECC of 01 March, 2023 “On Establishing REC Caucasus Project-Level Grievance Redress Mechanism (GRM) for the GEF Financed Project “Sustainable Management of Agricultural Biodiversity in Vulnerable Ecosystems and Rural Communities of Samtskhe-Javakheti Region in Georgia”.

### Purpose of the Project-level Grievance Redress Mechanism (GRM)

13. The Grievance Redress Mechanism (GRM) is an organization-level grievance redress mechanism created to receive complaints from project-affected people and communities who believe that a REC Caucasus-implemented project (Project) has caused or will cause them harm. The GRM facilitates a prompt response to grievances by providing support to Project team (REC Caucasus GRM Focal Point) to address the issues raised in a quick and effective manner.
14. The GRM is led by REC Caucasus Management through its Operational Policy/Manual (OP). The GRM for the Project “Sustainable Management of Agricultural Biodiversity in Vulnerable Ecosystems and Rural Communities of Samtskhe-Javakheti Region in Georgia” started operation in January 2023 and will be valid until the end of the Project.

### Main Stages of the Project-level Grievance Redress Mechanism (GRM)

15. The GRM mechanism includes the following stages:
  - In the instance in which the claimant has the means to directly file the claim, he/she has the right to do so, presenting it directly to the REC Caucasus management. The process of filing a complaint will duly consider anonymity as well as any existing traditional or indigenous dispute resolution mechanisms.
  - The complainant files a complaint through one of the channels of the grievance mechanism. This will be sent to the GRM Focal Point to assess whether the complaint is eligible. The confidentiality of the complaint must be preserved during the process.

- The GRM Focal Point will be responsible for recording the grievance and how it has been addressed if a resolution was agreed.
- If the situation is too complex, or the complainer does not accept the resolution, the complaint must be sent to a higher level (to REC Caucasus management), until a solution or acceptance is reached.
- For every complaint received, a written proof will be sent within ten (10) working days; afterwards, a resolution proposal will be made within thirty (30) working days.
- In compliance with the resolution, the person in charge of dealing with the complaint, may interact with the complainant, or may call for interviews and meetings, to better understand the reasons.
- All complaint received, its response and resolutions, must be duly registered.

### [Link to Extensive Internal Process](#)

#### 16. Internal process includes:

- GRM Focal Point. The complaint could come in writing or orally to the GRM Focal Point directly. At this level, received complaints will be registered, investigated and solved by the GRM Focal Point.
- If the complaint has not been solved and could not be solved in level 1, then the GRM Focal Point elevates it to the REC Caucasus management (Executive Director of the REC Caucasus /*Project Director*/).
- REC Caucasus management (Executive Director of the REC Caucasus /*Project Director*/) shall reinvestigate and solve the compliant.
- If the complaint has not been solved and could not be solved in level 2, then the GRM Focal Point elevates it to the Project Steering Committee (PSC) through the Executive Director of the REC Caucasus (*Project Director*).
- Project Steering Committee (PSC). The Executive Director of the REC Caucasus (*Project Director*) is requesting assistance of the PSC if a resolution was not agreed in levels 1 and 2.
- If the complaint has not been solved and could not be solved in level 3, the Executive Director of the REC Caucasus (*Project Director*) will request if necessary the advice of the UNEP-Europe Office (*Project Task Manager*) to resolve a grievance, or will transfer the resolution of the grievance entirely to the UNEP-Europe Office, if the problem is highly complex.
- The Project Task Manager at the UNEP-Europe Office will be requested his/her assistance only on very specific situations or complex problems through UNEP's procedures to solve the problem.

## Section III. Submission Procedures

### Eligible Complainant

17. *Complainants.* A complaint may be submitted by one or more individuals, or their representatives, who believe they are directly and adversely affected by the Project.
18. *Identity of Complainants.* The complaint must identify the individual(s) submitting the complaint, and whether they are Project-affected individual(s) and/or a local city/community representative.
19. *Confidentiality.* Complainants may ask that their identity be kept confidential. The request for confidentiality should be submitted with the complaint. The GRM Focal Point will maintain confidentiality of personal or classified information if requested.
20. *Representatives.* Complainants may submit a complaint through an authorized representative. The authorized representative must include his/her name and contact details and sign the complaint. The representative must also provide written proof (such as a signed letter by the complainant(s)) of his/her authority to represent and act on behalf of the complainant(s) in relation to the complaint. The GRM Focal Point will communicate directly with the authorized representative, as necessary and appropriate, and will keep the representative and/or complainant(s) informed about the status of the complaint. Complainants may also submit the complaint on their own behalf and appoint a contact person or persons for all communications regarding the complaint.
21. *Anonymous complaints.* Anonymous complaints will be deemed inadmissible. However, if an anonymous complaint contains specific information about Project-related issues, it will be forwarded to the REC Caucasus management (REC Caucasus Executive Director /Project Director/) for its information and follow-up, where appropriate.

### Submission of Complaint

22. Complaint can be submitted in any of the ways outlined below:

- Via email: [office@rec-caucasus.org](mailto:office@rec-caucasus.org)

The Regional Environmental Centre for the Caucasus (REC Caucasus)

*Grievance Redress Mechanism for the GEF Financed Project*

*“Sustainable Management of Agricultural Biodiversity in Vulnerable Ecosystems and Rural Communities of Samtskhe-Javakheti Region in Georgia” (Project ID: 10829)*

48/50 Mtskheta Street  
0179 Tbilisi, Georgia

- Via Office: A flyer with an attached complaint form will be available.

## Format and Language of Complaint

23. Complaints may be submitted in the Country's official language. All of the GRM correspondence with the complainant will be in Georgian and, where feasible, in English. In the event of any discrepancy between the two versions, the Georgian version will prevail.
24. No specific format is required as long as the required information is included: (a) identity of complainant(s) and representatives, if any; and (b) information as detailed in the section below.
25. Complainants may use the complaint form available in Annex I or any format of their choosing. Filing instructions are given in Annex II.

## Content of Complaint: Required Information

26. *Subject matter of a complaint.* A complaint must allege actual or potential harm resulting from a REC Caucasus implemented operation, regardless of whether the issues raised fall under the REC Caucasus's Operational Policies and Procedures. Complaints should raise *operational* matters but need not raise matters of non-compliance with such policies to be admissible.
27. *Substance of a complaint.* The complaint must state the adverse impact(s) allegedly caused or likely to be caused by the Project. This should be supported by available documentation and correspondence, where possible and appropriate, or upon the GRM Focal Point's request at a later date. The complainant(s) may also indicate the desired outcome of the complaint, i.e., how it may be resolved.
28. *Procurement related complaints* pertaining to the Project may be submitted to the GRM Focal Point by bidders or potential bidders (companies or individuals). These complaints will not be processed following GRM procedures but instead in line with the relevant provisions of the REC Caucasus procurement framework.

## Section IV. Admissibility

### Scope and Admissibility of Complaints

29. Complaints are *admissible* if they meet the following criteria:

- The Project is active, i.e., appraisal has begun and the Project has not yet closed;
- The complaint is filed by Project-affected individuals and/or communities, or their representative;
- The complaint alleges that the Project has caused or will cause harm to the individuals and or communities submitting the complaint.

30. The following issues are *excluded*:

- Issues pertaining to fraud and/or corruption in REC Caucasus-implemented Project;
- Issues related to obtaining employment with the REC Caucasus and/or the subject Project.

31. Complaints that are obviously frivolous or absurd are not admissible.

32. *Project level GRM.* If a complaint pertains to a Project with an existing project-level GRM, the GRM Focal Point will make the complainant(s) aware of this and encourage its use. However, it is the decision of the complainant(s) to use the Project-level GRM and/or continue the GRM process. The existence of a Project-level GRM and/or a complaint already lodged with it does not preclude the GRM from processing a complaint it receives.

### Determination of Admissibility

33. *Registration of complaints.* After receipt of a complaint, the GRM Focal Point immediately registers it in the Complaints Register (Annex III).

34. *Within five business days of receipt of the complaint,* the following takes place:

- *Notification of receipt.* The GRM Focal Point notifies the complainant(s) of receipt of the complaint. With the notification of receipt, the GRM Focal Point may also request additional information from the complainant(s).
- *Classification of complaint.* The GRM Focal Point determines whether the issues relate to procurement or to other matters falling within the mandate of the GRM, as set forth in these Procedures. If the complaint is related to procurement, the GRM Focal Point forwards the complaint to the REC Caucasus management (REC Caucasus Executive Director /Project Director/).
- *Notification to REC Caucasus staff.* If the complaint pertains to operational matters, the GRM Focal Point notifies the REC Caucasus management (REC Caucasus Executive Director /Project Director/) regarding receipt of the complaint.



35. *Evaluation.* Within 10 business days, the GRM Focal Point reviews and evaluates the complaint and determines whether the complaint meets the admissibility criteria set forth above, in consultation with relevant staff.
36. *Request for additional information.* During the 10-day admissibility assessment period, the GRM Focal Point may request further information from the complainant(s). If no response is received from the complainant(s) within 10 business days of the request, the GRM Focal Point contacts the complainant(s) again. If no response is received within 10 business days of the second request, the GRM Focal Point considers closing the case. However, even if the case is closed, if the complaint contains specific information about Project-related issues, the REC Caucasus GRM Focal Point may take action where appropriate.
37. *Admissible complaints.* If the complaint is admissible, the complainant(s) are notified of admissibility.
38. *Non-admissible complaints.* If the complaint is non-admissible, the complainant(s) are notified of this decision and the reasons for it, and are referred to relevant institutions, where appropriate. The GRM Focal Point then closes the case.

## Section V. Formulation of Proposal and Implementation

### Formulation of Proposal

39. After declaring the complaint admissible, the GRM Focal Point opens the Formulation of Proposal phase. GRM Focal Point reviews the issues raised and discuss possible ways to move forward. GRM Focal Point contacts the complainant(s) to review the concerns and agree on next steps to address the complaint. This communication occurs no later than 10 business days after the GRM Focal Point has communicated the admissibility of the complaint to the complainant(s).
40. GRM Focal Point, with support and advice from the REC Caucasus management (REC Caucasus Executive Director /Project Director/), formulates a proposal to address the issues raised in the complaint. Where required and appropriate, the GRM Focal Point also seeks support and advice of the Project Task Manager from UNEP Europe Office.
41. *Proposal to complainant(s)*. Within 30 business days after determination of admissibility of the complaint, the proposal should be presented to the complainant. In exceptional cases, e.g., for complex complaints or complaints supported by a large number of documents, the time limit provided for in this paragraph may be extended and the complainant(s) will be informed accordingly. The GRM Focal Point consults with and seeks the input of the complainant(s) on all aspects of the proposal.
42. The proposal should include an action plan with a time frame for its implementation.
43. *Agreement by complainant(s)*. If the proposal is accepted by the complainant(s), the GRM Focal Point implements it according to the process and timeframe set forth in the proposal. Agreement on the proposal should be reached within 30 business days after the initial proposal has been presented to the complainant. For extraneous circumstances, additional time can be granted if both parties agree.
44. *Rejection by complainant(s)*. If the proposal is rejected by the complainant(s) and/or the complaint cannot be resolved through the process outlined in these procedures, the GRM Focal Point informs the complainant(s) that no resolution could be reached. The GRM Focal Point then refers to other options for remedy, where appropriate, in accordance with these Procedures and informs about it the complainant(s).

### Implementation of Proposal

45. *Implementation*. Once the proposal is accepted, GRM Focal Point promptly starts implementing the proposal. The proposed time frame will depend on the nature of the actions. The GRM Focal Point will inform the complainant(s) in advance and explain the scope of the action plan and the timeframe.
46. GRM Focal Point keeps the complainant(s) up to date on the status and progress of the implementation of the proposal until resolution of the complaint. GRM Focal Point may request support and advice through the GRM at any point.
47. *Monitoring* The REC Caucasus management (REC Caucasus Executive Director /Project Director/) maintains close contact with the GRM Focal Point to ensure that the proposal is implemented within the agreed time frame. The REC Caucasus management (REC Caucasus Executive Director /Project Director/) also maintains contact with the complainant(s) throughout the implementation period until resolution.

## Case Closure

48. *Resolution.* The GRM Focal Point considers the complaint resolved and closes the case when there is agreement with the REC Caucasus GRM Focal Point and the complainant(s) that the proposal has been successfully implemented and the issues addressed.
49. *No satisfactory resolution.* If complainant(s) believe that the complaint has not been addressed through the implementation of the agreed upon proposal, the REC Caucasus management (REC Caucasus Executive Director /Project Director/) and GRM Focal Point engage with the complainant(s) to determine whether and how a satisfactory outcome can be achieved.
50. If the above additional consultations do not lead to a further agreement, the GRM Focal Point refers the complainant(s) to other options for remedy, where possible and appropriate. The GRM Focal Point then closes the case.

## Section VI. Other Provisions

### Information Sharing and Communication with Complainants

51. The GRM Focal Point shares with the complainant(s) all information relevant to the case, including updates on the status and progress of the complaint handling process, to the extent possible and in compliance with the REC Caucasus Operational Manual on access to information related policies.
52. The GRM Focal Point maintains consistent communications with the complainant(s) throughout the process via email, phone communication or other means as preferred by the complainant(s).

### Information Dissemination and Outreach

53. The existence of the GRM is advertised through the Project documents (*including brochures and leaflets*) and the REC Caucasus's internal website. The principles and operating procedures of the GRM are made available in Project Target Area, both on the REC Caucasus's website and as a hard copy available in the REC Caucasus's Office.
54. For stakeholders with no access to the internet, an information leaflet with a complaint form is made available through REC Caucasus Project Team representative(s) in target area and distributed at outreach events.

### Publication and Reporting

55. The Complaints Register is kept at the REC Caucasus and regularly updated. The Register contains information on the subject Project (name, number and country); specific details of the complaint or the complainant(s) are not included.
56. The GRM Focal Point is responsible for external communications regarding complaints.
57. The GRM Focal Point produces an analysis of cases submitted through the GRM, which are also used to improve the operating procedures as appropriate.

### Freedom from Retaliation

58. REC Caucasus policies provide for the participation of project-affected people in Project implementation. In furtherance of these policies, the REC Caucasus also provides access to the GRM. It is the REC Caucasus's position that complainant(s) who use the GRM must not be subject to any form of retaliation based on the fact that they complained to the GRM.

## **ANNEXES**

## Annex I. Complaint Form



**THE REGIONAL ENVIRONMENTAL CENTRE FOR THE CAUCASUS**

**GEF funded Project “Sustainable Management of Agricultural Biodiversity in  
Vulnerable Ecosystems and Rural Communities of Samtskhe-Javakheti Region in  
Georgia”**

*(GEF Project ID: 10829)*

### COMPLAINT FORM

**To:**

The Regional Environmental Centre for the Caucasus (REC Caucasus)  
*Grievance Redress Mechanism for the GEF financed Project “Sustainable  
Management of Agricultural Biodiversity in Vulnerable Ecosystems and Rural  
Communities of Samtskhe-Javakheti Region in Georgia”  
(Project ID: 10829)*

48/50 Mtskheta Street  
0179 Tbilisi, Georgia

Email: [office@rec-caucasus.org](mailto:office@rec-caucasus.org)

### Section 1: Complaint

1. What harm do you believe the REC Caucasus-implemented project caused or is likely to cause to you or your community? Please describe in as much detail as possible.



2. What is the name of the REC Caucasus project? (If known)

3. Where is the REC Caucasus project located? (Please include city/municipality/community name)

4. Do you live in the project area?

5. Have you previously reported your concerns to REC Caucasus management? If yes, please provide the details about those communications and explain why you are not satisfied with the REC Caucasus's action in response.

6. If known, please list the REC Caucasus's operational procedures you believe have not been followed.

7. Do you expect any form of retaliation or threats for filing this complaint to the Inspection Panel?

## Section 2: Contact Information

8. Are you complainants or a representative of complainants?

Complainants:  Representing a complainant or community:

9. Would you like your name and contact details to be kept confidential? (*The REC Caucasus will not disclose your identities to anyone without your prior consent.*) Yes  No

10. Complainants' Names (Minimum two names and signatures are required):

Complainant 1	Complainant 2
Name <input type="text"/>	Name <input type="text"/>
Address <input type="text"/>	Address <input type="text"/>
Phone <input type="text"/>	Phone <input type="text"/>
Email <input type="text"/>	Email <input type="text"/>

11. We, the undersigned, request the REC Caucasus to investigate the issues described above.

Signatures (*More signatures can be sent as an attachment document*):

<input type="text"/>	<input type="text"/>
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NOTES:

- Please attach supporting documents, if available.
- If you have any difficulty in completing the form, please contact the REC Caucasus GRM Focal Point at [office@rec-caucasus.org](mailto:office@rec-caucasus.org)

## Annex II. Filing Complaint Form

### How to File Complaint (Request for Inspection)

The GRM is the REC Caucasus's project-level independent complaints mechanism. Its mandate is to ensure that the voices of people who may be adversely affected by REC Caucasus-implemented project are heard, and to promote accountability at the REC Caucasus.

The GRM is a non-judicial body that acts independently, impartially and objectively in evaluating the process followed by the REC Caucasus. The GRM does not investigate unless it receives a formal, written Request.

The GRM has the power to review REC Caucasus-implemented project, and determine whether REC Caucasus is following the REC Caucasus's operational policies and procedures which were put in place in order to provide social and economic benefits, and avoid harm to people or to the environment.

### Who Can File

The GRM will review complaints from:

- Any group of two or more people in the country where the REC Caucasus-implemented project is located and who believe that, as a result of the REC Caucasus's violation of its policies and procedures, their rights or interests have been, or are likely to be, adversely affected in a direct and material way. They may be an organization, association, society or other group of individuals.
- A duly appointed local representative acting on explicit instructions as the agent of adversely affected peoples.
- In exceptional cases, a foreign representative acting as the agent of adversely affected peoples.

### Requirements

The Requesters need to show in writing that:

- They live in the project area (or represent people who do), and have been or are likely to be adversely affected by project activities.
- They believe that they may suffer actual or future harm resulting from a failure by the REC Caucasus to comply with its policies and procedures.
- Their concerns have been brought to the attention of REC Caucasus Management, and they are not satisfied with the outcome.
- Format. Requests should be submitted in writing in any language, and no specific form or format is required. The Request should be dated and signed by the Requesters or their representative, and may be submitted via mail or electronically, with any supporting documentation. Requesters may ask for confidentiality in the handling of the Request.

## Annex III. Complaints Register



THE REGIONAL ENVIRONMENTAL CENTRE FOR THE CAUCAUS

**GEF funded Project “Sustainable Management of Agricultural Biodiversity in Vulnerable Ecosystems and Rural Communities of Samtskhe-Javakheti Region in Georgia”**

*(GEF Project ID: 10829)*

### **REC Caucasus Project-level Grievance Redress Mechanism (GRM) Complaints REGISTER (2023-2026)**

The register provides information about the complaints received by the REC Caucasus GRM. This register will be periodically updated to reflect the latest information recorded with regard to the progress and status of complaints.

No.	Date Received	City/Municipality	Title of Complaint	Status	Issues raised

