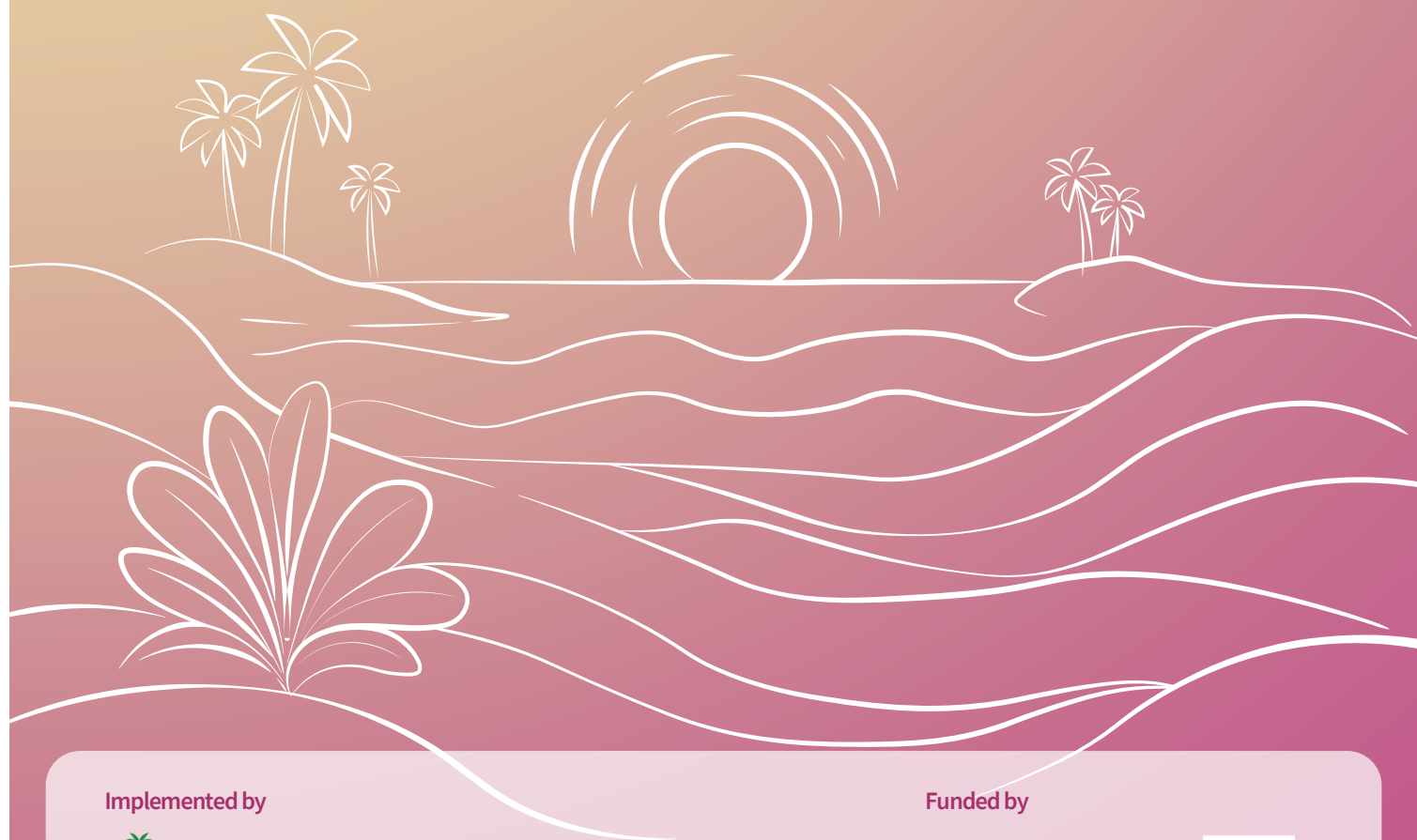


GRIEVANCE REDRESS MECHANISM

Enhancing Climate Resilience
and Food Security Project

grievances.resilience@environment.gov.mv



Implemented by



Ministry of Climate Change,
Environment and Energy

Funded by



JFPR
Japan Fund for Prosperous and
Resilient Asia and the Pacific



Enhancing Climate Resilience and Food Security Project
resilience@environment.gov.mv

GLOSSARY

ADB	Asian Development Bank
APs	Affected Persons
CBOs	Community-Based Organizations
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
MoCCEE	Ministry of Climate Change, Environment and Energy
NGOs	Non-Governmental Organizations
PMU	Project Management Unit
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SMR	Social Monitoring Reports

GRIEVANCE REDRESS MECHANISM

A. Introduction

1. The Grievance Redress Mechanism (GRM) establishes a project-specific, formal, and accessible process through which affected persons (APs) and other stakeholders may lodge complaints related to the environmental and social performance of the Project and seek timely resolution.
2. The Grievance Redress Mechanism (GRM) does not have legal authority to make binding decisions; rather, it functions as a facilitative mechanism to support the resolution of issues between affected persons and project authorities. Matters requiring legal determination, such as ownership disputes, will be addressed in accordance with Maldivian law, and affected persons retain the right to seek recourse through the judicial system at any stage, including while using the GRM. In line with good practice of the Asian Development Bank, the GRM promotes the use of traditional and community-based conflict resolution approaches, such as dialogue, mediation, and negotiation to reach mutually agreed solutions at the earliest possible stage. Where affected persons choose to pursue legal remedies, the Project will provide necessary support by sharing relevant information, including contact details of the Attorney General's Office, and the PMU will guide affected persons on accessing appropriate channels. Such support will be provided free of charge, and no fees are required to submit or process grievances through the GRM.
3. The GRM applies to all project activities and stages, including planning, design, site investigations, construction, and operation, across all project locations.
4. The GRM is open to everyone affected by the project, including community members, workers, and other stakeholders. It is free to use and can be accessed without fear of retaliation.
5. The GRM can be used to raise concerns such as:
 - a. Noise, dust, vibration, or traffic disturbances caused by construction
 - b. Pollution affecting land, groundwater, lagoons, or the marine environment
 - c. Poor waste management, including construction waste or hazardous materials
 - d. Damage to public infrastructure, private property, or natural resources
 - e. Worker-related issues, including behavior, interaction with the community, and workplace safety
 - f. Gender-based violence, sexual exploitation and abuse, or sexual harassment
 - g. Land-related issues, including voluntary land donation or land acquisition and relocation
 - h. Loss of income or livelihood and related support
 - i. Any other environmental or social concern related to project activities.

B. General Principle

6. This GRM establishes a transparent and time-bound mechanism with clear procedures for receiving, addressing, and resolving concerns of affected persons (APs) throughout the Project lifecycle.
7. The Project Management Unit (PMU) shall ensure that information on the GRM is disclosed to affected persons and stakeholders through appropriate means, including public consultations, information materials, and digital platforms.
8. The GRM shall be accessible to all affected persons and stakeholders, including vulnerable groups, and shall be implemented in a transparent, time-bound, culturally appropriate, gender-responsive, and socially inclusive manner, without cost and without retribution.
9. The GRM is accessible to both community members and project workers and does not restrict access to judicial or administrative remedies available under Maldivian law.
10. The PMU, Island/City Councils, and contractors will inform affected persons of the GRM upon approval of subprojects. Information will be disseminated through public consultations and distribution of public information materials, ensuring that affected persons are aware of their right to lodge complaints.
11. The GRM operates independently and ensures equitable treatment of all individuals, regardless of gender. It aims to facilitate timely resolution of concerns and minimize the need for prolonged or complex legal proceedings.
12. The GRM operates through a three-tier system. Tier 1 is managed at the contractor level, where grievances related to site activities are received and addressed. Tier 2 consists of a Grievance Redress Committee (GRC) at the subproject level, which reviews and resolves complaints through consultation and mediation. Tier 3 is handled by the Project Management Unit (PMU) safeguards team, which undertakes further review and coordination for unresolved cases. Complainants escalate complaints if not satisfied with the outcome at a given level.
13. For project workers, the grievance redress process is outlined in their employment contracts. General workplace grievances are addressed through the organization's Human Resource (HR) department or committee. Complaints related to sexual exploitation, abuse, or harassment are handled by the designated Sexual Exploitation and Abuse (SEA) / Sexual Harassment (SH) committee of the relevant Ministry.
14. For cases related to gender-based violence, sexual exploitation and abuse or sexual harassment, the GRM documentation and grievance forms will include contact details of the Ministry of Health, Family and Welfare (1421) or reporting@msfd.gov.mv. Confidentiality of the complainant will be strictly maintained in such cases.
15. Information on this reporting channel is clearly displayed on grievance information boards.

C. Grievance Resolution Process

I. Establishment of the GRM

16. The GRM is established prior to the commencement of civil works and is operational across all subprojects. This includes defining the three-tier structure, assigning clear roles and responsibilities to the PMU, contractors, and Grievance Redress Committees (GRCs), and designating focal points at each level. Standard operating procedures, grievance registration forms, logbooks, and reporting templates are developed and maintained. Multiple communication channels (e.g., phone, email, in-person submission, and grievance boxes, where appropriate) are in place to ensure accessible entry points for lodging complaints.

II. Induction and Training

17. Capacity-building and orientation sessions are provided to all relevant stakeholders, including PMU safeguards staff, contractors, site personnel, council representatives, and GRC members. Training covers GRM procedures, documentation and record-keeping, response timelines, communication with complainants, and principles of fairness and transparency. Particular attention is given to the handling of sensitive grievances (such as SEA/SH), maintaining confidentiality, and ensuring gender-responsive and socially inclusive approaches.

III. Dissemination of Information

18. Information on the GRM is proactively disseminated to affected persons and stakeholders across all project locations. This is carried out through community consultations, awareness sessions, public notices, distribution of information materials (e.g., leaflets and posters), and the use of mainstream and social media. GRM details are also made available on the project website. Information clearly explains the process for submitting complaints, available channels, expected timelines, and relevant contact details. All communication is provided in accessible formats and in the local language to ensure inclusivity.

IV. Monitoring

19. The PMU oversees and monitors the functioning and effectiveness of the GRM on an ongoing basis. This includes maintaining a grievance database to track the number, type, status, and resolution timeframe of complaints. Regular reviews assess responsiveness, resolution rates, and any recurring or systemic issues. Monitoring findings are documented and included in periodic safeguards reports, such as Social Monitoring Reports (SMRs). Where gaps are identified, corrective measures such as additional

training, process improvements, or enhanced outreach—are implemented to strengthen the GRM.

D. Grievance Resolution Mechanism

20. A three-tier Grievance Redress Mechanism (GRM) is established to address environmental and social concerns arising during the planning, design, field investigations, construction, and operation phases across all project locations. The GRM is accessible to affected persons (APs), community members, workers, organizations, and other stakeholders. Complaints may be submitted at any tier, and where a grievance is not resolved or the complainant is not satisfied, it will be escalated to the next tier. If tier one is unavailable or not yet on-site, the complainant may bypass the initial review stage and submit their grievance directly to the second tier. The mechanism is illustrated in Figure 2 and detailed in Table 2. The grievance registration form is provided in Annex 1.
21. The GRM operates through three tiers, with access to the national legal system available at all stages for Outputs 1, 2, and 3; for Output 4, as no contractor is engaged, a two-tier structure is applied, with Tier 1 omitted:

Tier 1: Contractor Level

22. Where subproject activities are implemented through contractors, the first point of contact for grievances will be the contractor responsible for the works.
23. A designated focal point at the contractor's office and/or site will be assigned to receive, register, and address complaints.
24. The contractor shall make reasonable efforts to resolve grievances within 14 days. If the issue is not resolved within this period, or the complainant is not satisfied, the grievance will be escalated to Tier 2.
25. In cases where a contractor is not yet mobilized, not present on site, or where the grievance is not directly related to contractor activities, the complainant may directly submit the grievance to Tier 2 without first approaching Tier 1.

Tier 2: Grievance Redress Committee (GRC)

26. A Grievance Redress Committee (GRC) will be established at the subproject level.
27. The composition and formulation of the GRC will be determined based on the specific subproject context and the stakeholders involved. It will reflect relevant stakeholders including, but not limited to, representatives from the Island/City Council, Women's Development Committee, community-based organizations (CBOs) / Non-Governmental Organizations (NGOs), and affected persons, ensuring gender equality and social inclusion. At the second tier, the GRC will include relevant authorities as required by the specific subproject (e.g., sector agencies, facility management entities, or implementing partners).

The composition will be adapted in accordance with the nature, location, and scale of the subproject to ensure appropriate and context-specific stakeholder representation.

28. The GRC will review grievances that are either (i) escalated from Tier 1 after 14 days without resolution, or (ii) directly submitted to Tier 2 as specified in clause 28. The GRC will facilitate resolution through consultation, mediation, and joint problem-solving, in line with ADB's good practice on community-based conflict resolution.
29. Grievances not resolved at Tier 2 will be referred to the PMU safeguards team, including the Social Safeguards Specialist, Environmental Safeguards Specialist, and PMU Gender Expert.

Table 1: Proposed Composition of the Grievance Redress Committee

Member	Number	Position
Chairperson	1	Representative from Island/City Council / Landowner
Member	1 - 3	May include representatives from the Women's Development Committee, local NGOs, or CBOs, affected persons, community representatives, or relevant technical/project stakeholders
Secretary	1	Project Safeguards Specialist

Tier 3: Project Management Unit (PMU) Safeguards Team

30. At the third tier, the Ministry of Climate Change, Environment and Energy (MoCCEE) PMU will be based in Malé and have two designated staff members (the Social Safeguards Specialist and Environmental Safeguards Specialist) to address all potential complaints from the public, workers and other APs for the pre-construction, construction and operation of the Project. They will liaise regularly with the island councils, contractors and site supervisors regarding any grievances received. They will also liaise with national agencies and line departments as required.
31. The PMU will review and investigate the grievance and coordinate with relevant stakeholders to identify and implement appropriate solutions.
32. The PMU will ensure that no costs are imposed on the aggrieved party, that confidentiality is maintained where required, and that all decisions and actions are communicated in a timely and transparent manner.
33. If the aggrieved person is a female, then the GRC must include at least one female member (ideally a representative from the local WDC) to participate in the hearings. In case of the absence of any of the members during the decision-making process, an appropriate candidate will be nominated by the original representative.

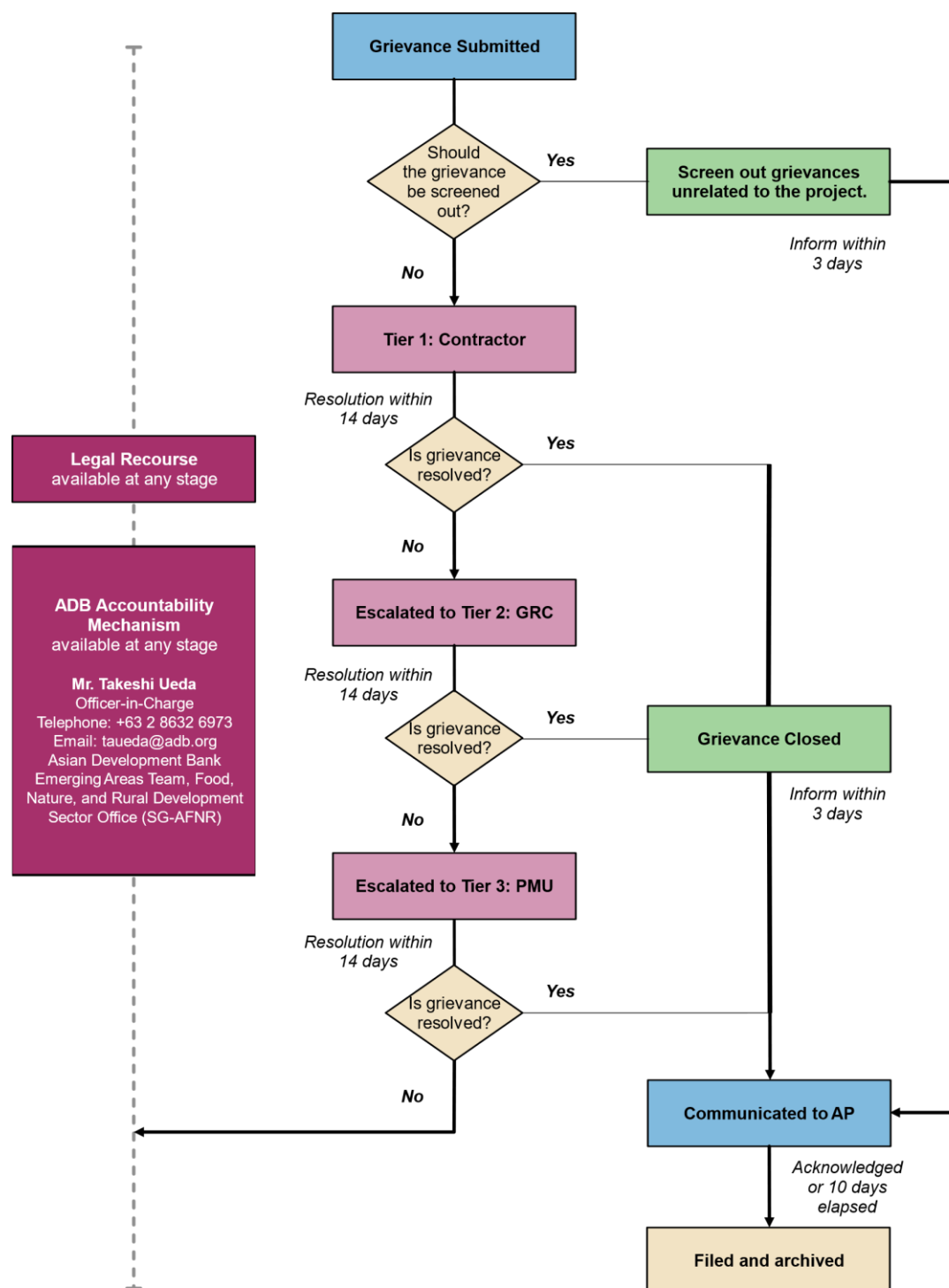


Figure 1: Grievance Resolution Tiers Flowchart

Table 2: Grievance Redress Mechanism

Focal Contact	Person for	Contacts, Communication and Other Facilitation by Project	Timeframe to address grievance
First Tier: Contractor			
Designated contact persons will be established within the Contractor's Company with a designated contact number.	•	In the contractor's office and the project site there will be an Information Board providing details of the GRM listing the names, sex and contact telephones/emails. Grievances can be registered informally by contacting the designated focal point. If the grievance cannot be resolved informally, a formal complaint can be registered through phone/email or by submitting the complaint form (Annex 1). The form must be available online (digital form) on the websites of the project (ECRFS) and physical forms will be available from the contractor's office, at the council offices and at PMU, including drop boxes to submit physical forms. A hotline is established to receive grievances via phone call and mobile message. For those who are visually impaired and/or cannot properly write, a staff will assist in filling the complaint form and get it signed by the aggrieved party. The contractor's office will screen the grievance to determine if the issues and concerns raised in the complaint falls within the mandate of the project. If it is related to the project, the contractor's office will inform the aggrieved party in writing (copied to PMU) how the case will be processed as per this GRM. This shall be completed within 03 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter will be read to the person in presence of a witness and the witness should declare their witness to this event. Alternatively, if it is not related to the project, contractor's office will inform the aggrieved party that it is not related to the project in writing (copied to PMU) and will inform how the case will be handled. This communication shall be completed within 03 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason), the issued letter will be read to the person in presence of a witness and the witness should declare their witness to this event. Where the grievance is related to the project, the contractor's office will come up with a solution either by (i) discussing within the contractor's office; (ii) joint problem solving with the aggrieved parties, PMU and the contractor or; (iii) a combination of both options. The contractor's office will communicate the final decision in writing, in terms of how the grievance was handled to the aggrieved party within 14 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued decision will be read to the person in presence of a witness and the witness should declare their witness to this event. The aggrieved party must acknowledge the receipt of decision and submit their agreement or disagreement with the decision within 10 days. If no acknowledgement is submitted from the aggrieved party, then the decision will be considered as accepted. If the grievance is not resolved to the satisfaction of the aggrieved party within 14 working days of submission to Tier 1, the aggrieved party may	14 working days

notify the GRC and the Ministry of Climate Change, Environment and Energy (PMU), in writing, of the intention to escalate to Tier 2. In such cases, Tier 1 shall formally inform and refer the grievance to Tier 2, including all relevant documentation and actions taken to date.

- The contractor's office will maintain records of all complaints received and share with PMU.

Second Tier: Grievance Redress Committee (GRC)

Designated contact persons will be established within the GRC with a designated contact number.	• In cases where a contractor is not yet mobilized, not present on site, 14 working days or where the grievance is not directly related to contractor activities, the complainant may directly submit the grievances to Tier 2 without approaching Tier 1. • The composition of the GRC will reflect relevant stakeholders depending on the subproject context, including, but not limited to, representatives from the Island/City Council, Women's Development Committee, community-based organizations (CBOs) / Non-Governmental Organizations (NGOs), and affected persons, ensuring gender equality and social inclusion. At the second tier, the GRC will include relevant authorities as required by the specific subproject (e.g., sector agencies, facility management entities, or implementing partners). • The composition will be determined based on the nature, location, and scale of the subproject, and will be adapted to ensure appropriate representation of stakeholders relevant to the subproject's needs. • Where the aggrieved party is not satisfied with the outcome of the decision by the contractor's company or where the aggrieved party is of the view that the contractor's company is not capable of justly solve the issue or where the grievance is not resolved within 14 working days the grievance can be upgraded to tier 2. • The contractor's company will forward the grievance to the Grievance Redress Committee (GRC). • A formal receipt of the complaint will be provided to the aggrieved party. • The GRC will come up with a solution either by (i) discussing within the committee;(ii) joint problem solving with the aggrieved parties, the committee and the contractor, undertaking site visits and holding onsite discussions or; (iii) a combination of all these options. • The GRC will be responsible to ensure that there is no cost imposed on the aggrieved person. • GRC will communicate the final decision in writing, in terms how the grievance was handled to the aggrieved party within 14 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter should be read to the person in presence of a witness and the witness should declare their witness to this event. • The aggrieved party must acknowledge the receipt of decision and submit their agreement or disagreement with the decision within 10 days. • If no acknowledgement is submitted from the aggrieved party then the decision will be considered as accepted. • If the grievance is not resolved to the satisfaction of the aggrieved party within 14 working days of submission of the grievance to tier 2 then the aggrieved party may notify the Ministry of Climate Change, Environment and Energy (PMU), in writing, of the intention to move to tier 3. In such cases, Tier 2 shall formally inform and refer the grievance to Tier 3, including all relevant documentation and actions taken to date. • The GRC will maintain records of all complaints received and share with PMU.
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Third Tier: Ministry of Climate Change, Environment and Energy (Project Management Unit)

The social and environmental safeguards specialist of the PMU or the designated contacts for the PMU.	• Where the aggrieved party is not satisfied with the outcome of the 14 working decision by GRC or where the aggrieved party is of the view that the GRC is not days capable of justly solve the issue or where the grievance is not resolved within 14 working days the grievance can be upgraded to tier 3. • The GRC will forward the grievance to Ministry of Climate Change, Environment and Energy (PMU). • A formal receipt of the complaint will be provided to the aggrieved party. • The PMU will come up with a solution either by (i) discussing in the project steering/technical committee; (ii) joint problem solving with the aggrieved parties, the committee and the contractor (iii) undertaking site visits and holding onsite discussions or; (iii) a combination of all these options. • The PMU will be responsible to ensure that there is no cost imposed on the aggrieved person. • The PMU will communicate the final decision in writing, in terms how the grievance was handled to the aggrieved party within 14 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter should be read to the person in presence of a witness and the witness should declare their witness to this event. • The aggrieved party must acknowledge the receipt of decision and submit their agreement or disagreement with the decision within 10 days. • If no acknowledgement is submitted from the aggrieved party then the decision will be considered as accepted
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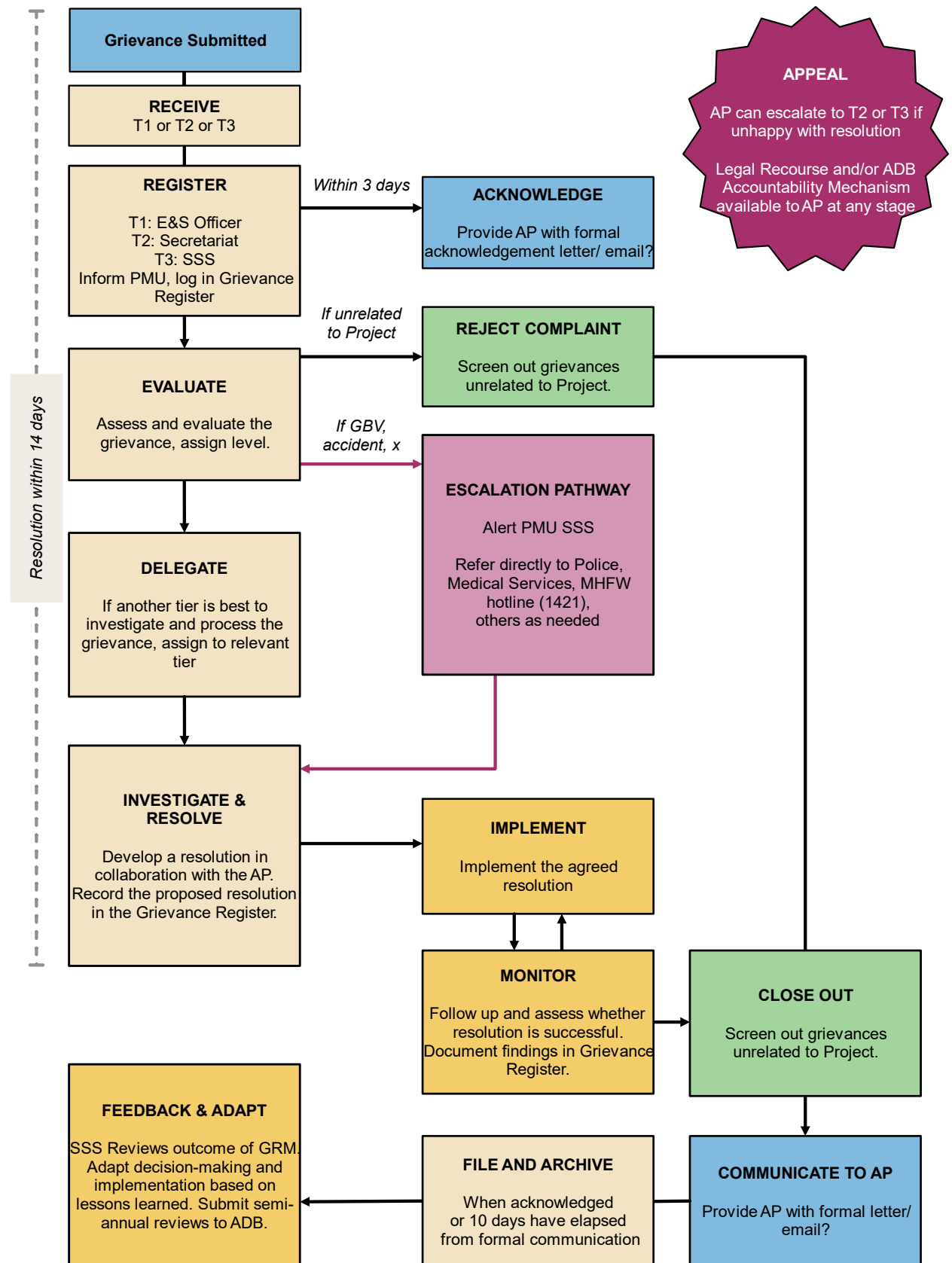


Figure 2: Grievance Resolution Process Flowchart

E. Key Parties and GRM Structure

34. The GRM operates through a three-tier structure across all outputs. Tier 1 is generally managed at the contractor level, unless otherwise specified based on the nature of the site and implementing arrangements.
35. The PMU, in coordination with the Ministry of Education, participating schools, SIFCO, land-owning institutions, and the Ministry of Agriculture and Animal Welfare, ensures that GRM information is disseminated to students, parents, teachers, school staff, contractors, park visitors, SIFCO staff, and surrounding communities. Information is shared upon or prior to commencement of construction activities through school assemblies, parent-teacher meetings, park notice boards, public notices, information materials, community outreach, and social media platforms.

I. Output 1: Weather and Climate Infrastructure (Addu & Velana Airports)

36. For subprojects under SP1.1 at Addu International Airport (Gan) and SP1.2 at Velana Airport (Hulhulé):

Tier 1:	Managed by the construction contractor
Tier 2:	Comprises representatives from the respective airport authority (Addu International Airport and Maldives Airports Company Limited), together with the Maldives Meteorological Service (MMS).
Tier 3:	Managed by the PMU.

37. Given that these islands are industrial and managed by airport authorities rather than local councils, the GRC structure is adapted accordingly. Grievances may be submitted by any aggrieved party, regardless of residency on the island.

II. Output 2: Coastal Protection and Drainage (Kulhudhuffushi)

- Kulhudhuffushi City:**

Tier 1:	Managed by the construction contractor
Tier 2:	A formal Grievance Redress Committee (GRC) is established at the city level due to the scale and duration of activities. (Table 1)
Tier 3:	Managed by the PMU.

38. The GRC in Kulhudhuffushi City comprises a five-member body to facilitate timely resolution of grievances (refer to Table 1).

III. Output 3: Urban Agriculture and School Gardening Initiatives

a. School Gardening Program:

Tier 1:	Managed by the contractor responsible for installation works.
Tier 2:	Comprises the respective School Administration in coordination with the Ministry of Education.
Tier 3:	Managed by the PMU.

b. National Urban Agriculture Demonstration Plots (Institutional/Public Land):

Tier 1:	Managed by the contractor responsible for installation works.
Tier 2:	Comprises the respective land-owning institution in coordination with the Ministry of Fisheries, Agriculture and Ocean Resources.
Tier 3:	Managed by the PMU.

c. Kudakudhinge Bageecha Demonstration Plot:

Tier 1:	Managed by SIFCO in its capacity as site manager.
Tier 2:	Comprises the respective land-owning institution in coordination with the Ministry of Fisheries, Agriculture and Ocean Resources.
Tier 3:	Managed by the PMU.

IV. Output 4: Climate adaptation businesses, services, and urban farming - Matching Grants

The GRM follows a two-tier structure as no contractor is engaged and Tier 1 is absent

Tier 1:	The GRM follows a two-tier structure as no contractor is engaged and Tier 1 is absent.
Tier 2:	Grievances are first addressed at Tier 2 by SME Digital
Tier 3:	Managed by the PMU.

F. ADB Accountability Mechanism

39. The AP have the right to submit their complaint at any time directly to the respective Project Officer at ADB headquarters, writing in any of the official languages of ADB's Developing Member Countries. The PMU Social Safeguard Specialist will support the AP in providing the following contact information of ADB:

Mr. Takeshi Ueda
Officer-in-Charge
Telephone: +63 2 8632 6973
Email: taueda@adb.org
Asian Development Bank
Emerging Areas Team, Food, Nature, and Rural
Development Sector Office (SG-AFNR)

40. The PMU Social Safeguards Specialist shall support aggrieved persons in accessing ADB grievance channels, including providing the following contact information:

Ms. Aminath Shareef
Social Safeguards Specialist
Telephone: +960 3019143
Email:
grievances.resilience@environment.gov.mv /
aminath.shareef@environment.gov.mv
(ECRFS Project, CCD, MOCCEE)

G. Grievance Redress Mechanism Complaint Form (Annex 1)

The Enhancing Climate Resilience and Food Security Project welcomes suggestions, complaints, queries and comments regarding the project. We encourage persons with grievance to provide their name and contact information to enable us to get in touch for clarification and feedback.

Should you opt to include your personal details but want that information to remain confidential, please inform us by writing 'CONFIDENTIAL' above your name.

Digital Form Link: [Grievance Submission Form \(School Garden\)](#) / [شکایت فرم \(مدرسه باغ\)](#)

No.	GRIEVANCE RECORDING FORM		
1	Date of Grievance Reporting		
2	Location of Grievance Reporting		
CONTACT INFORMATION AND GRIEVANCE			
3	Name		
4	Gender	Male	Female
5	Age		
6	Home address		
7	Atoll, Island, Community		
8	Phone		
9	Email		
10	Complaint, comment or question – please provide details (who, what, where, how)		
11	How do you want to be reached for updates?		
12	Signature		
FOR OFFICIAL USE			
11	Registered by: (Name, position, phone number of the official registering the grievance)		
12	Mode in which grievance is received:	☐ Note/Letter ☐ E-mail ☐ Verbal/telephone	
14	Signature and date of the official recording grievance:		
15	Has AP/Complainant been handed over a copy of the grievance form?	Yes	No
16	Reviewed by: (Name, position, phone number of the official reviewing the grievance)		

17	Action taken:		
18	Whether action taken disclosed:	Yes	No
19	Means of disclosure:		

H. Grievances Record and Action Taken Template (Annex 2)

Record Number	Date	Name of Complainant	Contact Number / Email Address of Complainant	Details of the Complaint	Place	Status of Redress (Resolved / Unresolved with Date)	Remarks (Details of how the complaint was resolved)	Details of the person who received the complaint. (Name and Designation)

I. FORMAT FOR RECORDING THE PROCEEDINGS OF GRIEVANCE REDRESS COMMITTEES (Annex 3)

Name of the complainant/s:

National identification number

Address:

Date of the inquiry:

Time:

Whether complainant participated or not:

Grievance or issue (in summary):

Statement made by the complainant/s:

GRC recommendation:

Participants in the GRC: