

Simplified Approval Process

Annex 12: Environmental and social action plan



Summary of risks	Mitigation measures	Risk significance	Responsible party/person	Schedule	Expected results	Cost/Budget
ANPC and ANAMET have identified climate-related risks affecting agriculture and infrastructure due to recurrent floods and droughts in Togo.	The project will propose improved flood control infrastructure and capacity-building for local communities on climate-resilient practices. During early stages of the implementation, the project will also conduct detailed climate vulnerability assessments to ensure localized adaptation measures that align with Togo's National Adaptation Plan.	Medium	ANAMET & ANPC Technical Team	Initial phase and ongoing	Effective and rapid response to hazards, improved technical capacity, and reliable climate data collection and analysis.	Part of project activities
Inadequate funding poses a significant threat to the project's success, particularly in transferring critical technology and building the necessary capacity in Togo. The project aims to modernize weather monitoring equipment, enhance data management infrastructure, and provide extensive training for the Togolese Meteorological Agency (ANAMET). Without sufficient funds, these activities could be severely limited, undermining the project's objectives of improving climate data accuracy and resilience against climate-related hazards.	To mitigate this risk, the project will diversify funding sources by engaging additional international donors and private sector partners. This includes establishing collaborations with organizations such as the African Development Bank (AfDB), the World Bank, and private sector stakeholders interested in climate resilience. Furthermore, a robust financial management system will be implemented to ensure efficient use of available funds. The project will also introduce cost-recovery mechanisms for some of its services, such as selling high-quality climate data to agricultural businesses and infrastructure developers. These measures will not only secure additional funding but also ensure sustainable financial practices.	High	Project Finance Manager	Throughout project duration	Secured funding, efficient fund utilization, and a sustainable financial model that supports ongoing project activities and maintenance.	\$100,000
Implementing advanced weather monitoring equipment and sophisticated software infrastructure can face operational challenges due to technical complexities and potential maintenance issues. This risk is particularly pertinent in Togo,	To ensure the smooth operation of new technologies, the project will provide comprehensive training programs for ANAMET and ANPC technical staff, focusing on both the operation and maintenance of the equipment. Regular maintenance schedules will be established, and a local technical support team will be	Medium	ANAMET & ANPC Technical Team	Initial phase and ongoing	Effective operation and maintenance of equipment, improved technical capacity, and reliable climate	\$50,000

where technical expertise and resources may be limited. Failure to address these challenges could result in unreliable climate data, affecting the country's ability to respond to climate-related hazards such as floods and droughts, which are prevalent in Togo.	set up to handle any technical issues promptly. Collaboration with international technical partners will be sought to provide ongoing support and updates. By enhancing local capacity, the project will ensure that the new technologies are effectively utilized and maintained.				data collection and analysis.	
Cultural heritage degradation risks could occur if artefacts are encountered during project implementation.	In framework of the project, the BOAD will work with Togo's cultural heritage authorities to follow the "chance-find" procedure for any cultural artifacts encountered during project implementation. Since Hydrometer stations are meant to be implemented on government regional offices there is no need for specific guidance for identifying and protecting cultural heritage sites, for these areas are already outside historical areas, ensuring compliance with Togolese heritage preservation regulations.	Low	Project Integrity Officer	Throughout project duration	Reduced risk of cultural heritage degradation.	NA
While traditional agricultural practices are an integral part of Togolese culture and contribute to community identity, there may be challenges in adopting new agricultural practices and forestry projects aimed at enhancing climate resilience. Some community members might exhibit skepticism towards these innovations, especially if they do not immediately perceive clear benefits. Additionally, the need to address climate-related risks, such as soil erosion and deforestation, may require a careful balance of integrating traditional knowledge	They are no Indigenous Peoples, as defined by ESS standard within the project area. Nevertheless, a national process to engage local communities in Togo, ensuring respect for traditional knowledge and customs. The project will prioritize extensive community engagement and awareness campaigns to educate local populations about the long-term benefits of sustainable agricultural practices and forestry projects. Demonstrating the tangible benefits, such as increased crop yields and improved soil quality, will be crucial. The project will work closely with local leaders and influencers to foster trust and acceptance. Additionally, providing incentives such as access to better seeds, tools, and technical	Medium	Community Outreach Coordinator	Initial phase and ongoing	High community engagement, successful adoption of new practices, and enhanced community resilience to climate-related risks.	\$75,000

with new approaches. Engaging local communities in a participatory manner will be essential to foster collaboration and ensure that the proposed initiatives respect cultural values while promoting sustainable environmental practices.	support will encourage community involvement. These efforts are designed to build community ownership and ensure the sustainability of the initiatives.					
Political instability or changes in government policies pose a risk to the continuity and success of the project. In Togo, political dynamics can influence the implementation of development projects. Political unrest or shifts in policy priorities could disrupt project activities, leading to delays or the redirection of resources away from critical climate resilience initiatives.	Political instability or changes in government policies pose a risk to the continuity and success of the project. In Togo, political dynamics can influence the implementation of development projects. Political unrest or shifts in policy priorities could disrupt project activities, leading to delays or the redirection of resources away from critical climate resilience initiatives.	Low	Project Steering Committee	Throughout project duration	Stable project environment, alignment with national policies, and uninterrupted project activities.	\$20,000
The risk of project funds being diverted for money laundering or terrorist financing activities poses a serious threat to the project's integrity and effectiveness. Such activities could lead to legal repercussions, loss of donor confidence, and a failure to achieve project objectives, particularly in a region where regulatory oversight may be challenging.	To mitigate this risk, the project will implement strict financial oversight, including regular audits and compliance with international AML/CFT regulations. All personnel will receive training on AML/CFT standards and practices to ensure vigilance against such risks. Additionally, partnerships with financial institutions that have robust AML/CFT measures will be established. These measures aim to detect and prevent any suspicious activities, ensuring that funds are used appropriately and transparently.	Low	Project Compliance Officer	Throughout project duration	Compliance with AML/CFT standards, minimized risk of fund diversion, and maintained project integrity.	\$20,000
Engaging with entities or individuals under international sanctions could result in legal and financial repercussions,	To avoid this risk, the project will conduct thorough due diligence checks against the United Nations and other relevant sanctioning authorities' lists for all partners	Low	Due Diligence Officer	Initial phase	Compliance with international sanctions, legal and financial	\$10,000

compromising the project's legitimacy and funding.	and contractors. This includes utilizing databases and consulting with legal experts to ensure compliance. By doing so, the project can avoid collaborations that might violate international sanctions, thus safeguarding its operations and reputation.				safeguards, and uninterrupted project activities.	
Corruption and fraud can significantly undermine the project's goals by diverting resources away from intended activities, damaging stakeholder trust, and leading to inefficient project implementation. This risk is particularly high in areas with weaker governance structures.	The project will implement robust anti-corruption policies and regular monitoring to detect and prevent fraudulent activities. Establishing whistleblower protection mechanisms will encourage the reporting of corrupt practices without fear of retaliation. Training sessions on ethics and integrity will be conducted for all project personnel. By fostering a culture of transparency and accountability, the project aims to minimize the risk of corruption and fraud.	Medium	Project Integrity Officer	Throughout project duration	Reduced risk of corruption and fraud, maintained project integrity, and efficient utilization of resources.	\$40,000
The risks associated with labor working conditions could lead to legal repercussions, loss of donor and stakeholder confidence, and a failure to achieve project objectives.	The project plans to engage local communities by creating job opportunities in the installation of Hydrometer stations, prioritizing compliance with Togolese labor laws to ensure fair working conditions. Project will provide labor safety training particularly for remote areas where workers may face increased hazards, and outline protocols for managing potential labor risks, including heat stress and transportation challenges in rural Togo.	Low	Project Integrity Officer	Throughout project duration	Reduced risk of poor labor condition.	\$10,000
Resource Efficiency and Pollution Prevention risk could occur during the project lifecycle associated with emissions/greenhouse gases, water use/wastewater, waste management and hazardous materials if hydrometer	Resource use in Togo's dry northern regions will require efficient water management strategies, especially near Hydrometer stations. The project will implement pollution prevention protocols for hazardous materials, such as batteries and electronic waste from Hydrometer installations. Additionally, the project will align with Togo's emissions standards by integrating	Low	Project Integrity Officer	Throughout project duration	Reduced risk of GHG emissions.	NA

installations are not dimensioned to be low carbon.	solar power into the Hydrometer infrastructure to reduce carbon footprint.					
Community engagement and stakeholder consultations: Risk of exploitation during interactions with project staff.	Conduct all consultations in supervised public settings; gender-segregated spaces for sensitive discussions.	Low	SEAH Specialist; PMU Manager	Ongoing	Safe and respectful consultation environments.	NA
Installation of infrastructure: Increased harassment risks for women and girls in host communities.	Mandatory SEAH prevention training for contractors; strict codes of conduct; periodic inspections.	Low	Contractors; SEAH Specialist	Pre-deployment and quarterly inspections	Reduced harassment cases and safer community environments.	NA
Training and capacity building sessions: Exploitation risks during resource allocation and opportunities.	Gender-segregated training sessions; SEAH focal points; anonymous reporting channels.	Medium Low	Trainers; Gender Specialist	Training phase	Equal and secure participation for all genders.	NA
Data collection and survey activities: Risk of unwanted interactions or exploitation.	Ensure gender-matched data collectors; conduct activities in public spaces; mandatory SEAH code of conduct.	Medium Low	Data Collection Coordinator	During field activities	Increased trust and safe engagement during data collection.	NA
Digital interactions with community members: Risk of cyber harassment.	Enforce strict data protection policies; train community members on safe technology use.	Low	IT Coordinator; SEAH Officer	During project rollout	Minimized risks of cyber harassment and secure digital communication.	NA

Land for Hydromet stations will be provided by government inside regional ANPC offices and/or partner government organizations, ensuring no involuntary resettlement of any population and therefore respecting community land access rights.

The project has no impact on areas of ecological sensitivity, such as forests or near rivers. The project will include reforestation and soil rehabilitation plans in case of habitat disruption by climate hazards engaging local environmental authorities to monitor impacts on biodiversity and align actions with Togo's conservation policies. Community workshops will be conducted to communicate conservation efforts and involve local stakeholders in biodiversity monitoring.

Conflict management and resolution

Guiding principles

A conflict management mechanism must be defined in advance and aligned with traditional mechanisms, to enable negotiations to be conducted and agreements reached to manage conflicts in communities that may be affected. The programme will conform to BOAD guidelines on grievance management. These include the Policy and Grievance Procedures Manual, the Manual of Policy and Procedures of Verification of the Conformity of the BOAD, Environmental Guidelines (EG) EG-07 on the involuntary resettlement of populations and EG-42 on social analysis issues for projects.

The grievance resolution mechanism will be proportionate to the potential risks and impacts of the project and will be accessible and inclusive. Where feasible and suitable for the project, the grievance resolution mechanism will use existing formal or informal mechanisms, supplemented as needed with project-specific arrangements.

a) The grievance resolution mechanism must respond quickly and effectively to concerns, in a transparent manner that is culturally appropriate and easily accessible to all project-affected parties, at no cost and without retribution. The mechanism, process or procedure will not prevent access to judicial or administrative remedies. The borrower will inform the project-affected parties of the grievance procedure in the course of its community engagement activities and will make publicly available a record documenting the responses to all grievances received.

b) Grievances will be handled in a culturally appropriate manner that will be discreet, objective and sensitive to the needs and concerns of the project-affected parties. The mechanism will also allow for anonymous complaints to be raised and addressed.

Tools and processes

A suggested design and planning process outline for a grievance resolution mechanism (GRM) is provided in annex 3. The mechanism provides for a Grievance Management Policy and Procedures Manual (GMPPM) as a formalized framework for receiving and addressing requests or complaints and resolving the problems of people affected by the BOAD-financed projects. The procedures provided for in the GMPPM will be implemented when those who have suffered a loss as a result of a BOAD-financed project bring complaints or grievances against BOAD. BOAD's grievance resolution process is intended to establish an effective dialogue between populations affected by the projects it finances and all interested parties, with a view to resolving the root problem(s) of a request, without attributing responsibility or fault to any party.

It will be based, as far as possible, on existing processes at the country, programme or project level. The process will operate as closely as possible to the project level and affected communities, although national grievance resolution processes may also be available and proposed either by the host country or, in some cases, by BOAD. Dispute resolution involves the voluntary participation of various stakeholders in a consensus-based grievance management process through mediation, conciliation, facilitation, negotiation or similar means. The reasons for participating in these processes can vary considerably, depending on the different contexts. Process facilitators must be able to use a wide variety of techniques and have a high degree of flexibility in terms of timing and methods.

Affected communities or other stakeholders affected by BOAD-supported programmes and projects will be able to submit grievances to BOAD through the channels established for this purpose, i.e. mail, email, fax or telephone. Given the nature of the grievance resolution process and its reliance on the voluntary and active participation of all stakeholders, the identity of the affected persons involved in the grievance process will generally not be kept confidential. BOAD will support the establishment, at the level of the projects or programmes it finances, of specific grievance resolution processes operated by the project leader or the host government.

Contact Details for the GCF Independent Redress Mechanism:

Contact details for the GCF Independent Redress Mechanism are not explicitly provided in the text of Annex 12. However, general references to the GCF grievance resolution mechanisms are mentioned, emphasizing their availability to all stakeholders.

For accurate contact details of the **GCF Independent Redress Mechanism**, stakeholders are directed to visit: <https://www.greenclimate.fund/irm> or contact them via:

- **Email:** irm@gcfund.org
- **Mail:** Independent Redress Mechanism, Green Climate Fund, Songdo Business District, 175 Art Center-daero, Yeonsu-gu, Incheon 22004, Republic of Korea.

Establishment of programme procedure

As part of the project, the steering committee will establish a grievance resolution mechanism at the national level.

Preventing risks of Gender-based Violence or Sexual Exploitation, Abuse, and/or Harassment (SEAH)

In line with GCF Revised Environmental and Social Policy,¹ the current programme defines “**Sexual Abuse**” as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. “**Sexual Exploitation**” on the other hand refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to profiting monetarily, socially, or politically from the sexual exploitation of another. “**Sexual Harassment**” includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, that interferes with work, is made a condition of

¹ <https://www.greenclimate.fund/sites/default/files/decision/bbm-2021/decision-bbm-2021-18-bbm-2021-18-decision-board-revisions-gcf-esp-reaffirm-fund-s-commitment.pdf>

employment, or creates an intimidating, hostile, or offensive environment in connection with financed activities.

The current programme recognizes the existence of risks and context specific factors related to gender-based violence (GBV) and Sexual Exploitation, Sexual Abuse and Sexual Harassment (SEAH) in all four targeted countries (see Annex 8 – Gender Assessment). Meanwhile, power imbalances and tensions over the control of resources between beneficiaries, potential movement of workers and stakeholders away from their homes as well as remote physical location of some investments (creating opportunities for the perpetration of SEAH) may negatively interact with contextual fragilities, increasing the risk of SEAH being perpetrated.

However, the small-scale and community-level nature of the activities, the participatory approach to activity design, application of the Gender Action Plan and the compliance with GCF and BOAD related gender policy mean that **these risks remain low**. They derive mainly from the presence of programme staff or consultants spending time in communities and from survivors and/or communities being unable to identify or report instances of SEAH. Therefore, **specific capacity building activities and a Grievance Redress Mechanism will be developed to ensure that there is a common understanding of SEAH risks and to provide a survivor-centred and gender-responsive pathway to prevent and respond effectively to SEAH.**

In accordance with the Green Climate Funds (GCF) Revised Environmental and Social Policy (ESP) (B.BM-2021/18) and Sexual Exploitation, Abuse and Harassment (SEAH) Risk Assessment Guideline, all programme activities will also be designed, implemented and monitored to ensure they are safe and prevent SEAH.

Key elements of the project's survivor-centred approach include:

- Empowerment and Agency: Survivors will be empowered by ensuring they have access to information about their rights, available support services, and the grievance redress process. Survivors will be provided with the opportunity to make informed decisions about how they wish to proceed with their grievance, including whether they want to pursue formal or informal resolution pathways.
- Confidentiality and Privacy: maintaining confidentiality and privacy throughout the grievance redress process is of the utmost importance. Measures will be put in place to safeguard the confidentiality of survivors' identities and the details of their grievances, while still ensuring transparency and accountability in addressing complaints.
- Safety and Support: The safety and well-being of survivors will be paramount. Survivors will have access to appropriate support services, including medical, psychosocial, and legal assistance, as needed. Additionally, measures will be taken to protect survivors from retaliation or further harm.
- Trauma-Informed Approach: the approach will be informed by an understanding of the potential trauma experienced by survivors of SEAH. A supportive and non-judgmental environment will be created that recognizes the complex effects of trauma on survivors' experiences and responses.

The programme will further target women's participation in decision-making processes and in investments implementation and management. By design, the project mainstreams inclusiveness (social equity) and gender considerations to ensure climate vulnerabilities are addressed considering specificities associated with gender-based inequalities. This is done through gender sensitive climate risk assessments, gender sensitive and participatory planning progress and promotion of gender-

responsive investments. The Gender Action Plan (GAP) developed (annex 8) will be followed throughout the programme implementation to ensure compliance with GCF Gender Policy and ESS guidelines.

BOAD definitions for environmental and social assessments

1. Environmental audit: an instrument to determine the nature and extent of all environmental areas of concern at an existing facility. The audit identifies and justifies appropriate measures to mitigate the areas of concern, estimates the cost of the measures, and recommends a schedule for implementing them.

2. Environmental and Social Impact Assessment (ESIA): an instrument to identify and assess the potential environmental and social impacts of a proposed project, evaluate alternatives, and design appropriate mitigation, management and monitoring measures.

3. Environmental and Social Management Plan (ESMP): an instrument that details

(a) the measures to be taken during the implementation and operation of a project to eliminate or offset adverse environmental impacts, or to reduce them to acceptable levels; and (b) the actions needed to implement these measures.

The ESMP is an integral part of Category B ESIAs (irrespective of other instruments used).

4. Hazard assessment: an instrument for identifying, analysing and controlling hazards associated with the presence of dangerous materials and conditions at a project site. The Bank requires a hazard assessment for projects involving certain inflammable, explosive, reactive, and toxic materials when they are present at a site in quantities above a specified threshold level. For certain projects, the ESIA report may consist of the hazard assessment alone; in other cases, the hazard assessment is part of the ESIA documentation.

5. Project area of influence: the area likely to be affected by the project, including all its ancillary aspects such as power transmission corridors, pipelines, canals, tunnels, relocation and access roads, borrow and disposal areas, and construction camps, as well as unplanned developments induced by the project (e.g. spontaneous settlement, logging, or shifting agriculture along access roads). The area of influence may include, for example,

a) the watershed within which the project is located; b) any affected estuary and coastal zone; c) off-site areas required for resettlement or compensatory tracts; d) the airshed (i.e. where airborne pollution such as smoke or dust may enter or leave the area of influence); e) migratory routes of humans, wildlife, or fish, particularly where they relate to public health, economic activities, or environmental conservation; and f) areas used for livelihood activities (hunting, fishing, grazing, gathering, agriculture, etc.), or religious or ceremonial purposes of a customary nature.

6. Regional Environment and Social Assessment: an instrument that examines environmental issues and impacts associated with a particular strategy, policy, plan or programme, or with a series of projects for a particular region (e.g. an urban area, a watershed, or a coastal zone); evaluates and compares the impacts against those of alternative options; assesses legal and institutional aspects relevant to the issues and impacts; and recommends broad measures to strengthen environmental

management in the region. Regional Environment and Social Assessments pay particular attention to potential cumulative impacts of multiple activities.

7. Risk assessment: an instrument for estimating the probability of harm occurring from the presence of dangerous conditions or materials at a project site. Risk represents the likelihood and significance of a potential hazard being realized; therefore, a hazard assessment often precedes a risk assessment, or the two are conducted as one exercise. Risk assessment is a flexible method of analysis, a systematic approach to organizing and analysing scientific information about potentially hazardous activities or about substances that may pose risks under specified conditions. The Bank requires a risk assessment for projects involving the handling, storage or disposal of hazardous materials and waste, the construction of dams, or major construction works in areas vulnerable to potentially damaging natural phenomena. For certain projects, the Environmental and Social Impact Assessment report may consist of the risk assessment alone; in other cases the risk assessment is part of the ESIA documentation.

8. Sectoral Environment and Social Assessment: an instrument that examines environmental issues and impacts associated with a particular strategy, policy, plan, or programme, or with a series of projects for a specific sector (e.g. power, transport or agriculture); evaluates and compares the impacts against those of alternative options; assesses legal and institutional aspects relevant to the issues and impacts; and recommends broad measures to strengthen environmental management in the sector. Sectoral Environment and Social Assessments pay particular attention to the potential cumulative effects of multiple activities.

Exclusion list and programme criteria

BOAD, and this programme, will not finance the following projects:

- Production or trade in a product or activity deemed illegal under host country laws, regulations, international conventions and agreements, or subject to prohibitions, such as certain pharmaceuticals, pesticides/herbicides, substances harmful to the ozone layer, polychlorinated biphenyls (PCBs), fauna or products regulated by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)
- Production or trade of arms and ammunition
- Production or trade of alcoholic beverages (excluding beer and wine)
- Production or trade of tobacco
- Gambling, casinos and equivalent companies
- Production or trade of products with an asbestos plug (asbestos-free). This does not apply to procurement and labour exploitation where the asbestos to cement ratio in asbestos cement sheets is less than 20 per cent.
- Drift net fishing in the marine environment using nets in excess of 2.5 km in length
- Production or activities involving harmful effects or exploitative forms of forced/harmful labour or child labour
- Production or activities negatively and disproportionately affecting women and girls, persons in vulnerable positions and situations and marginalized groups.
- Activities considered unsafe and risky in terms of Sexual Exploitation, Sexual Abuse and Sexual Harassment (SEAH).
- Category A projects according to BOAD procedures. A project is classified as Category A if it is likely to have significant adverse, sensitive, diverse or unprecedented impacts on the environment and society. These effects can be felt in an area larger than the sites or facilities subject to physical works.

Suggested format for the development of a project-level grievance resolution mechanism and related planning procedures

For each project to be financed under this BOAD-GCF programme, the grievance resolution mechanism will be established in accordance with the guidance provided in the BOAD Policy and Grievance Procedures Manual, the Manual of Policy and Procedures of Verification of the Conformity of the BOAD, Environmental Guidelines EG-07 on the involuntary resettlement of populations and EG-42 on social analysis issues for projects. I will also follow GCF's Revised Environmental and Social Policy (ESP) (B.BM-2021/18) as well as Sexual Exploitation, Abuse and Harassment (SEAH) Risk Assessment Guideline.

The first stage in designing a project-level grievance resolution mechanism is to determine its primary objective. This would generally be to resolve specific grievances in a manner that meets the needs of both the project management and the community, is survivor-centred and gender-responsive and adapted local variation. The scope of grievances that can legitimately be filed by the communities and/or individuals concerned should be defined in advance. This scope will generally cover most, if not all, of the issues raised in a typical environmental and social assessment: natural resources, pollution, cultural assets, land acquisition, income of resettled or displaced populations, welfare of vulnerable groups, SEAH, etc.

1. The scope, scale and type of grievance resolution mechanism required will be proportionate to the nature and scale of the potential risks and impacts of the project.
2. The grievance resolution mechanism may include the following elements: a) different means by which users can submit their grievances, including in person, by telephone, SMS, mail or email or via a website; b) a document in which grievances are recorded in writing and maintained in a database; c) publicly advertised procedures, specifying the length of time users can expect to wait for acknowledgement, response and resolution of their grievances; d) transparency about the grievance resolution procedure, governance structure and decision makers; and e) an appeals procedure (including the national judiciary) to which to refer grievances when the complainant party is not satisfied with the resolution.
3. The borrower may resort to mediation when users are not satisfied with the proposed resolution.

The second stage would be to design the grievance resolution mechanism as follows:

- Develop a pilot/preliminary structure.
- Choose ways to receive, record, assess and respond to grievances, taking into account language barriers/limitations and the need for anonymity if a complainant fears reprisals or in the case of submission from an authorized representative or civil society organization.
- Choose grievance resolution methods.
- Develop a means of tracking and monitoring grievances, i.e. a document in which grievances are recorded in writing and maintained in a publicly accessible database. The database should include information about the complaint and its resolution, including the remedial measures taken, taking into account that the identity of the complainant may remain anonymous upon request. This database and the independent GCF resolution mechanism must be made available to the different stakeholders.

- Publicly advertise procedures; identify the means for submitting grievances; specify the length of time that users can expect to wait for acknowledgement, response and resolution of their grievances; set out the transparency of procedures, and identify governance and decision-making structures.
- Develop the grievance resolution mechanism's infrastructure, including an appeals procedure to which unsatisfied grievances may be referred.
- Make information on other grievance resolution mechanisms available, including on the independent GCF grievance resolution mechanism, the BOAD grievance resolution mechanisms, and the grievance resolution mechanisms implemented by other entities.
- Review and refine the design, which may be done with the help of a specialized independent consulting firm (if resources are available).

In order to facilitate and improve grievance management, it will be important to establish a Grievance Resolution Committee (GRC) at the project level. GRC members must be qualified, experienced and competent individuals who can earn the respect and trust of affected communities. Gender balance is a key element in GRC composition. Suggested criteria for the constitution of the GRC could be:

- Knowledge of the project, its objectives and outcomes
- Technical knowledge and expertise to understand the project design and requirements
- Understanding of the social, economic and cultural environment and community dynamics
- Ability to digest the issues addressed and to actively contribute to decision-making processes
- Social recognition and status
- Balanced representation of men and women within the committee

The GRC team may also include members from local government authorities, NGOs or community representatives.

Procedures, means of complaint and time limits for project-level grievance mechanisms

As there is no single approach to grievance resolution, the best conflict solutions are generally found through mechanisms that take into account specific local issues, cultural context, local customs, conditions and project scope. The process for accepting or rejecting a complaint must be carefully designed to maximize interactivity and cultural sensitivity. The acceptance or rejection of a complaint is preceded by a discussion phase, during which the complainant and grievance resolution mechanism staff assess the grounds for the complaint. After this discussion, the complainant must be clearly and transparently informed whether the complaint is admissible or not. Acceptance/rejection of the complaint is based on the objective criteria displayed, including a written copy posted in a public place in an appropriate language.

If accepted, the complaint should be processed in several stages:

- The complaint is filed and labelled with an identification code that is immediately communicated to the complainant.
- The complaint is assessed (including severity of risk/impact).
- The response is prepared.
- The choice of grievance resolution approach is key.

There are four general approaches to choose from:

- 1 - The project management proposes a solution.
- 2 - The community and the project management make a decision together.
- 3 - The project management and the community rely on a third party to decide.
- 4 - The project management and the community rely on traditional or customary practices to find a solution.

A step-by-step guide to managing a grievance:

1. Receive and file the complaint.
2. Assess and validate the complaint.
3. Formulate a response.
4. Choose a resolution approach (see above) based on consultation with the affected group or individual.
5. Implement the approach.
6. Resolve the problems.
7. Monitor and assess the outcomes.
8. Draw lessons from the experience and communicate with all parties involved.

List of documents relevant to the ESMF

The following documents are available from: <https://www.boad.org/politiques-procedures-directives/> (some English versions are available at <https://www.boad.org/en/policies-procedures-guidelines/>)

BOAD – Manual of Policy and Procedures of Verification of the Conformity of the BOAD, November 2013

BOAD Environmental Guidelines:

EG01 – Financial intermediary; EG02 – Natural sites; EG03 – Sustainable forest management; EG04 – Dams and reservoirs; EG05 – Land and water resource management; EG06 – River basins; EG07 – Involuntary resettlement of populations; EG08 – Indigenous peoples, tribes, lower castes and ethnic minorities; EG09 – Cultural heritage; EG10 – Integrated management of pests and use of agrochemicals; EG11 – Biological diversity; EG12 – Planting and reforestation; EG13 – Wetlands/marshes; EG14 – Coastal and shoreline management; EG15 – Natural disasters; EG16 – Flood prevention; EG17 – Irrigation and drainage; EG18 – Fisheries; EG19 – Agricultural production; EG20 – Livestock and grazing area management; EG21 – Arid and semi-arid areas; EG22 – Social problems in environmentally sensitive areas; EG23 – Tourism development; EG24 – Port infrastructure; EG25 – Oil refining; EG26 – Oil and gas pipelines; EG27 – Hydroelectric projects; EG28 – Electricity transmission networks; EG29 – Thermal energy projects; EG30 – Large-scale housing projects; EG31 – Solid waste and disposal systems (collection, treatment, recycling); EG32 – Hazardous materials management; EG33 – Agro-industry; EG34 – Food industry; EG35 – Fertilizer plant; EG36 – Chemical and petrochemical industry; EG37 – Cement industry; EG38 – Steel industry; EG39 – Non-ferrous metal industry; EG40 – Industrial risk management; EG41 – Public health and safety; EG42 – Social analysis issues of projects; EG43 – Induced development; EG44 – Institutional capacity-building - ESRM Sector Guide on Off Grid Standalone Solar for Financial Service Providers – ECOWAS Centre for Renewable Energy and Energy Efficiency (ECREEE), BOAD, ECOWAS Bank for Investment and Development (EBID)

**Risk significance. The probability of occurrence is the likelihood for a risk to occur and can be characterized in terms of the degree to which it will happen (for example, the UNDP screening procedure uses “expected, highly likely, moderately likely, not likely, and slight”). The impact or magnitude of risks is the description of how severe the impacts would be if it were to occur (for example, “critical, severe, moderate, minor, and negligible”). A significance value of the risk (for example low, medium, high) can be obtained by combining the probability and impact values. The risk significance indicates the relationship between probability and severity or magnitude of impacts. The entities or organizations that will be implementing the proposed activities are best positioned to define the probability of occurrence and severity or magnitude of impacts.*

There is no single technique to determine the significance of risks nor will it apply in all situations. The entities and organizations that will be implementing the activities will need to determine which technique will work best for each situation. Determining risk significance would require an understanding of activities and locations, the urgency of situations, and objective judgment.