

REPUBLIC OF LIBERIA
MONROVIA CITY CORPORATION (MCC)
CHEESEMANBURG LANDFILL AND URBAN SANITATION
PROJECT GRANT NO. TF-A1481-LR
REVISED GRIEVANCE REDRESS MECHANISM (GRM)



PREPARED BY
THE PROJECT IMPLEMENTATION UNIT (PIU)
MONROVIA CITY CORPORATION (MCC)

April, 2021

Table of Contents

1.0	Background.....	2
2.0	Grievance Redress Mechanism	3
2.1	The Grievance Redress Process.....	3
I.	Community Level.....	3
II.	National/ PIU Level.....	4
2.2	Grievance Redress Procedure	5
3.0	Dissemination of the Grievance Redress Mechanism.....	7
4.0	Monitoring and Reporting.....	8
5.0	Contact Mediums for Lodging Complaints.....	9
6.0	Evaluation and Update of the Grievance Redress Mechanism	10
I.	ANNEX A: List of the Project Affected Communities Grievance Committee	11
II.	ANNEX B: Sample of the Grievance Redress Form.....	Error! Bookmark not defined.
III.	ANNEX C: Sample of the Grievance Resolution Form	Error! Bookmark not defined.

1.0 Background

The Government of Liberia (GOL) has strengthened its commitment to provide sustainable waste management services for its citizens through her engagement with the World Bank and other funding institutions including the European Union through the Liberia Reconstruction Trust Fund in transforming the waste management sector. The World Bank has been working expansively with the Monrovia City Corporation (MCC) to rehabilitate, extend the network and expand sanitation services in the Country. The Bank's engagement started with the Emergency Monrovia Urban Sanitation (EMUS) project which provided support to Liberia through MCC to build the fundamentals of a solid waste management system in Monrovia. The project financed the construction of the first sanitary landfill in Whein Town to replace the Fiamah dumpsite. The EMUS project also enhanced the capacity of the Monrovia City Corporation (MCC) to manage the sector and supported project-initiated community-based enterprises (CBEs) to take charge of primary collection. The Whein Town landfill site, completed in 2012 as an emergency and temporary facility, has almost reached its maximum carrying capacity with a remaining useful lifespan of about a year. In response to this, MCC under the Cheesemanburg Landfill Urban Sanitation (CLUS) project will support the construction of the Cheesemanburg Regional Landfill and partial closure of the Whein Town Landfill as well as provide improved access to Solid Waste Management services in Monrovia and its environs. The Project will also provide technical assistance to carry out studies to improve urban management and strengthening institutional Capacity building.

For a project of this nature, MCC recognizes that disputes may occur during project implementation on varying issues, including project impacts not fully assessed and addressed, unequal distribution of project benefits and assistance, compensation, etc. particularly for the local communities around the landfill site. The project has assessed and identified mitigation measures through the Environmental and Social Impact Assessment (ESIA) report and the Abbreviated Resettlement Action Plan (ARAP). in compliance with the World Bank Safeguards policies and relevant laws and regulations of Liberia.

The ESIA, ARAP and Project Appraisal Document identified the need for the Project Implementation Unit (PIU) at MCC to set up a simple and functional grievance redress mechanism to address citizen feedback, grievances, and complaints that may arise during project implementation. The law of Liberia extends the right to aggrieved persons to seek redress to their concerns or grievances at the court of law. Besides the judicial system, a dispute may also be resolved through mechanisms such as mediation at administrative agencies, where the aggrieved party refers the dispute to a third party for a decision binding on both parties; or arbitration, where both parties appoint a board or arbitrators who may make a binding decision on resolution of the dispute. Court cases are known to be cumbersome and time consuming. In this light, and in compliance with the World Bank safeguards policies, this Grievance Redress Mechanism (GRM) is prepared to establish a responsive grievance redress mechanism that represents a collaborative problem-solving effort between the PIU and Project-affected communities to identify problems and solutions. The ultimate goal of this GRM is to

reach long-lasting solutions that address stakeholders' concerns. Aggrieved people would however remain free to access the courts without any hindrance or retribution from the project as provided for in the laws of Liberia.

2.0 Grievance Redress Mechanism

A Grievance Redress Mechanism (GRM) establishes a recourse instrument designed to resolve disputes in an impartial manner. It provides complainants with the assurance that their grievances will be resolved in a timely and satisfactory manner without cost to them. Complaints could arise from:

- Failure to register all PAPs;
- Project impacts not fully assessed;
- Inadequate assistance or not as per entitlement matrix;
- Dispute about ownership;
- Delay in disbursement of assistance; and
- Improper distribution of assistance

The objectives of the GRM seek to address the following:

- Provides affected persons or parties with easily accessible and locally available mediums for making compliant and resolving any dispute that may arise during the course of project implementation in a timely manner.
- Ensures that appropriate and mutually acceptable corrective actions are identified and implemented to address complaints;
- Verify that complainants are satisfied with outcomes of corrective actions; and avoid the need to resort to judicial proceedings.

The Grievance Procedure will not replace any existing legal processes available to affected parties, and will not infringe on complainants' right to access existing legal procedures. It will seek to resolve issues promptly and fairly without resorting to expensive and time-consuming legal actions. The Grievance Procedure will be in place throughout the project duration. It is hoped that the GRM will be institutionalized as a system and tool in MCC.

2.1 The Grievance Redress Process

The GRM provides a two-tier channel at the community level and PIU level for beneficiaries and other stakeholders to raise grievances.

- I. **Community Level** –The local grievance structure at the community level shall serve as the first channel for affected persons in the community to seek redress to their complaints. The Cheesemanburg Community Liaison Officer (CCLO) is designated to receive and resolve complaints at that level. A Community Grievance Redress Committee (CGRC) shall be established at this level to support the CCLO in grievance

resolution process. Each CGRC shall comprise of seven (7) or nine (9) persons from the following groups;

- Project Affected Persons (PAPs)
- Local Official (Township Commissioner or Council Chairman)
- Town Chiefs
- Elders
- Youth Groups and
- Women group

II. **National/ PIU Level –**

PIU/MCC Management – A higher Grievance Redress Committee shall be set up at the project management level. This committee shall comprise a mix of senior management staffs of the PIU, MCC’s Environmental Health and Safety (EHSE), and Community Service Departments. Members of Key staff include; the Project Coordinator, Safeguard Officer, Finance Officer, Solid waste, EHSE and Community Service Directors. The number of persons shall be odd numbers (Seven (7) or Nine (9)) and should be decided by the PIU. Members of the committee will meet to resolve grievances that could not be resolved at the Community level as well as new complaints brought to their attention. Depending on the severity of the complaint, the PIU can invite staffs from relevant Government Institutions; Environmental Protection Agency (EPA), Ministry of Lands Mines and Energy (MLME), Ministry of Public Works (MPW), Ministry of Health and Social Welfare (MoHSW), etc. to address and resolve issues.

The project’s safeguards officer shall be responsible to lead handling complaints at this level. The Solid Wastes Site Supervisors and Managers could also receive complaints from the local communities because they may be closer to the PAPs and will avoid undue transport and time cost to the PIU office. The Site Supervisors and Managers will ensure that such complaints reach the safeguard officer within 24 hours via phone call or through submission of grievance forms. The safeguard officer shall receive all complaints, officially register these complaints and coordinate with the project staff or department responsible to address the grievance.

- ## III. **Court of law** - If the affected person still feels dissatisfied with decisions reached at both the community and PIU level, he/she will be left with the discretion to seek legal remedy in a competent court of jurisdiction. The law of Liberia allows any aggrieved person the right of access to the Court of law. Courts of law will be a “last resort” option, in view of the above mechanism.

Responsibilities of the Grievance Redress Committees

Depending on the nature and complexity of a complaint, the committee will endeavor to resolve complaints within two (2) weeks upon receipt. The grievance officers or team is tasked with the responsibility to:

- Investigate the authenticity and legitimacy of the complaint;
- Review the issues raised;
- Assess severity of impact of complaint on Project delivery;
- Determine the underlying cause, engage the complainant and all impacted stakeholders and coordinate with the departments and specialists responsible for addressing the complaints;
- Coordinate and prepare internal report and recommendations – recommendations may be operational corrective actions, improvements to existing policies or continuous engagements with stakeholders using internal stakeholder engagement process that encompasses traditional ways of resolving RAP grievances;
 - Resolution options shall be developed taking into consideration complainant resolution objectives, community preferences, waste management policies, past experience, current issues, and potential outcomes;
- Arrange meeting with the complainant and all affected stakeholders, discuss the investigation process and solutions and get complainant’s consent to the intervention;
- Close the case if complainant and affected stakeholders are satisfied with the action taken; if not, forward the complaint to the next level.

2.2 Grievance Redress Procedure

Aggrieved Persons shall follow the procedures outlined below when seeking redress for a complaint, and grievance committees shall consider the step by step procedures when redressing a grievance.

Step by Step Procedures to follow when lodging and redressing a Complaint

Step 1: Lodging of grievance

Project beneficiaries and the general public can lodge formal grievances at (i) the office of the Cheesemanburg Community Liaison Officer (CCLO) located at the Administrative Building in the Cheesemanburg community (ii) the project safeguards officer at the PIU and (iii) site supervisors/managers at the waste transfer stations or landfill sites.

Complaints can be channeled through the following mediums:

- In person at the offices indicated above
- **Phone Calls & Text Messages** through the following cell numbers
 - The Project’s Office (PIU) contact number: **+231-778-752-872**
 - The Project’s Safeguard Officer contact number: **+231-770-479-866**
 - Cheesemanburg Community Liaison Officer Contact number: **+231-776-519-682**
 - MCC’s Director for Community Services Contact number: **+231-777-119-510**
- **Email** through the project’s official email address on – clusproject2017@gmail.com

- **Mail Box** – Mail boxes at Fiamah and Stockton Creek Transfer Stations, Whein Town Landfill, Cheesemanburg Landfill construction site and the PIU/MCC office. These boxes will be checked on a daily basis to address concerns.

In cases of sensitive issues; if a complainant may want to hide his/her identity while lodging or filling a complaint, grievance officers should allow him/her to do so for security reasons.

Step 2: Acknowledging and Sorting Grievances

All complaints, no matter the medium lodged, will be recorded in a grievance form (**see sample of grievance form under section 3**) with the assistance of the assigned officers. Grievances will be screened and logged by category (for example compensation payments, impacts from project activities or livelihood restoration issues) and sensitivity level in a grievance tracking matrix.

The assigned officers shall acknowledge receipt of the grievance verbally right after recording the complaint, and if it is considered a low risk or non-project related complaints (information request, updates, clarifications etc.) it could be resolved and closed out on the spot. Where grievances require investigations, the assigned officers will inform complainant of the response timeline. Depending on the level at which the grievance is being resolved, the CLO or safeguards officer will inform and set up the grievance committee meeting to commence investigations. Grievance received by the site supervisors/managers will be submitted to the safeguards officer for follow-up. Those who cannot read or write (illiterates) will be assisted by his/her family member or a relevant community leader (chief, elder, etc.) to be a witness and help affix the person's signature.

Step 3: Investigation at the Community Level

All complaints, pending resolution, shall be communicated to the safeguards officer at the PIU to be logged and tracked in the grievance matrix. The CLO will consider and prioritize the grievance received and select a suitable date for investigation together with the committee and complainant. The investigations will include collecting and review of relevant documents, making site visits, taking photographs as applicable, consulting appropriate internal staff, contacting external stakeholders, interviewing the grievance owner and other relevant persons as deemed fit.

As indicated, for each level of redress, grievances shall be addressed or resolved within ten (10) working days (two weeks) of receipt. The complainant might be contacted during this time to clarify issues.

Step 4: Resolution and sign-off at the Community Level

Once a complaint has been investigated and the committee has reached a conclusion, the results and proposed course of action to resolve the grievance will be communicated to the complainant through a written letter and in person in the language understood by the complainant. If the complainant is satisfied with the proposed decision, he/she will be required to sign a statement (**see sample Certification of grievance resolution form under section 3**) confirming that the complainant is satisfied and this will be the condition to close out a case/ grievance. Again, for unlettered persons, any of the family members, community leaders or elders can serve as a witness and assist the person to affix

his/her finger print to the document if required. The CLO will also record the information pertaining to the decisions of the Committee(s) in the grievance log and submit same to the project safeguards officer for reporting.

If the complaint has not been resolved by mutual agreement, a re-assessment may be undertaken if new information becomes available in support of the claim/complaint. If the complainant is still not satisfied with the resolution, the CLO will then forward the grievance to the Safeguard Office at project Level for final decision at the project level.

Step 5: Lodging of grievance and acknowledgement at the Project Level

In cases where complainant is not satisfied with resolution suggested by the Community Grievance, or the complainant does not receive a response from the CGRC within 10 working days (two weeks), the affected person can appeal to the Safeguard Officer at the PIU/MCC. The PIU will also act on grievance received directly from the general public and those referred by the site supervisors/ managers. The safeguards officer will formally acknowledge the grievance and log it for tracking. The PIU will act on the complaint/grievance within ten (10) working days (two weeks) from the day of its filing.

Step 6: Resolution and sign-off at the Project

The Safeguard Officer will inform the rest of the Project's Grievance Redress Committee (PGRC) members (the Project Coordinator, Solid waste Managers, EHSE and Community Service Directors) at the PIU about the complaint. The committee will carry out investigation, if necessary, by visiting the site, conducting interviews and consultations with community dwellers and leaders.

Once the Redress process is completed and the relevant committee has reached a conclusion, The PGRC will inform the complainant in writing and in person and explain the results of the investigation, the proposed course of action in the language understood by the complainant and seek an agreeable decision.

- If the complainant is satisfied that the complaint has been resolved, he/she will be required to sign a statement confirming his/her satisfaction and this will be the condition to close out a case/grievance. Again, for unlettered persons, any of the family members, community leaders or elders can serve as a witness and assist the person to affix his/her finger print to the document if required.

Step 7: Lodging of grievance at a National Court of Jurisdiction

- If the Complainant remains dissatisfied with the decisions of the project, he/she can, as a last resort, appeal to a court of competent jurisdiction for redress. The Laws of Liberia allows any aggrieved person the right of access to Court of law.

3.0 Dissemination of the Grievance Redress Mechanism

To ensure that, the GRM is widely known and used by stakeholders, the project shall support dissemination activities to beneficiaries and other stakeholders on the operations of the GRM.

Specifically, the GRM contact numbers and email address will be posted on Dump Trucks, Transfer Stations and MCC/PCC Notice Board, Landfill Sites Notice Board and Public areas in Project communities. The project will also develop a simple GRM brochure disseminate information about the GRM through community consultations and radio announcement.

4.0 Monitoring and Reporting

The project will establish GRM database that only designated officers can access for entering, tracking corrective action, updating complaint status and generating GRM report. The Safeguards Officer will be responsible for producing GRM report monthly as part of the project reporting channels. Key indicators will include

- Number of grievances received
- Number of grievances resolved within the stipulated timeframe
- Number of outstanding grievances
- Reasons for outstanding cases
- Most reported issues and Correctional Action taken by the project to address these issues etc.

5.0 Contact Mediums for Lodging Complaints

- **Phone Calls & Text Messages** through the following cell numbers
 - The Project's Office (PIU) contact number: **+231-778-752-872**
 - The Project's Safeguard Officer contact number: **+231-770-479-866**
 - Cheesemanburg Community Liaison Officer Contact number: **+231-776-519-682**
 - MCC's Director for Community Services Contact number: **+231-0770175160**
 - Stockton Creek Transfer Station Manager Contact number:
 - Fiamah Transfer Station Manager Contact number:
 - Whein Town Landfill Manger Contact number:

- **Email** through the project's official email address on – info@clusproject.org

- **Mail Box** – Mail boxes at Fiamah and Stockton Creek Transfer Stations, Whein Town Landfill, Cheesemanburg Landfill construction site and the PIU/MCC office. The boxes will be checked on a daily basis to address concerns.

6.0 Evaluation and Update of the Grievance Redress Mechanism

This grievance redress mechanism has been, approved, set-up, disclosed and undergoing implementation through public awareness in the various communities surrounding the Project areas. During the course of its implementation, the project team has realized that some project affected people within the surrounding communities have complained but they are not channeling their complaints through the community grievance committees to get response/redress but they are writing higher authorities, the PIU and the Mayor officer directly. They also give numerous complaints at community meetings. These complaints are mostly from Leaders, Landowners, or the public which is not fine and this issue is common to all project affected communities. This have reached the attention of the Project team to the extent that the administrators (World Bank) of the Project has instructed the PIU to host meetings in all affected project communities and evaluate the GRM.

Due to this, several meetings were organized from July to November 2020, in all Project communities and consultations were carried out to evaluate the effectiveness of the Grievance Redress Mechanism with regards to acceptance by the Project affected communities to follow the procedures in lodging complaints and getting redress, considering World Bank standards and Liberia EPA requirements. However, all of the affected project communities are pleased with the Grievance Redress mechanism document and its procedures in lodging complaints and getting redress. They indicated that the problem is, the implementation of the mechanism in the project affected communities is weak. All of the communities stressed that Poor Publicity of the GRM by the community grievance committee (CGC), poor cooperation of grievance committee members, insufficient motivation from the project office are the key reasons for the ineffectiveness of the GRM in project affected communities. At the end of these meetings the following actions were recommended to ensure effectiveness:

- 1) Replacement of inactive committee members;
- 2) Re-Training of all Community Grievance Committees;
- 3) Robust awareness and publicity of the GRM within project communities by all Community Grievance committees headed by the CCLO and site Managers with support from the PIU; Rotate meetings in various parts of affected communities;
- 4) Publicize the Grievance box by putting an indication outside the facility where it is situated;
- 5) The Safeguard Officer and the Community Grievance Committee should always make grievance record forms available during community meetings for grievance uptake;
- 6) The PIU should provide Support (call cards and transportation allowance) to the committee members to enable them carry out their duties. They also requested Compensation/payment for each member of the Community Grievance Committee but were informed that the project cannot pay the grievance committee members because it will create distrust and destroy the confidence the community have in them to help implement the GRM. Furthermore, it is against EPA regulations and the World Bank policy on community engagements.

I. ANNEX A: List of the Project Affected Communities Grievance Committee

NO.	COMMUNITIES	NAMES	POSITIONS	CONTACTS
1	WHEIN TOWN GRIEVANCE COMMITTEE	Myers F. Gibson	General Chairman	0775-259958
2		Romeo W. Kehzie	Co-Chairman	0776-188642
3		Arthur G. Goah	Elder	
4		Mulbah D.S. Kerkulah	Town Chief	0777-904621
5		Wedee Julious	Woman Leader	0776-549658
6		Samuel Kofi Jones III	Youth Leader	0775-690695
7		Miatta Barlee	PAP Representative	0775-102627
1	FIAMAH COMMUNITY GRIEVANCE COMMITTEE	George Doemgbo	Town Chief	0555-867612
2		Elizabeth Greafield	Elder	0777-214962
3		Francis W. Togar	Women Representative	0776-972967
4		Marcus Dundas	Youth Leader	
5		Rankie Salebia	PAP Representative	
6		Cheeseman D. Bryant	Counsel Chair	0770-622798
7		Emmanuel Tarr	Youth Leader Advisor	
1	STOCKTON CREEK COMMUNITY GRIEVANCE COMMITTEE	James Freeman	Town Chief	0886-501293
2		Adolphus Fromoyan	Council Chair	0778-682-234
3		Ahmad T. Pabai	PAP Representative	0770-522511
4		Patrick Borley	Elder	0776-279986
5		Cecelia Toe	Women Leader	0777-270426
6		Samuel Koon Jr.	PAP Representative	0880-383638
7		Solomon Taplah Jr.	Youth Leader	
1	CHEESEMANBURG GRIEVANCE COMMITTEE	Hon. Thomas Cassell	Township Commissioner	0776-601895
2		Chief Blama Quaye	Town Chief	
3		Momode Gotolo	PAP Representative	0777-759748
4		Mohammad Jallabah	Town Chief	0770-383813
5		Sando V. Johnson	Women Group Leader	0775-048221
6		Jackson Bonokai	PAP Representative	0777-314446
7		Seh Dolo	Youth Leader	0777-412957
8		Jerry Moore	Council Chair	
9		Charles G. Momo	Elder	077-6157754
1	PROJECT LEVEL GRIEVANCE COMMITTEE	Edwin Johnson	Project Coordinator	0886-594-384
2		Harriett Peal-Keamu	Safeguard Officer	0770-479866
3		Prince Saye Doelah	Analyst - MFDP	0776-199635
4		Dorris W. Fahngon	Director CSD MCC	0770-175160
5				
6		Sayetta D. Kpadeh	Director HSE MCC	0770-545983
7		Sennay Carlor III	Manager HSE MCC	0770-212461
8		Boye Robertson	Director City Planning	0770-454569
9		Agnes Peabody	Supervisor SME&CBEs	0777-900837

REPUBLIC OF LIBERIA
MONROVIA CITY CORPORATION (MCC)
Cheesemanburg Landfill and Urban Sanitation Project (CLUS)

Grievance Redress Form

Name of Community (Grievance Office): _____

Grievance Number: _____

1.	Complaint Registration Date	
2.	Name of Person filing Grievance/Complaint	
3.	Address of Person filing Complaint	
4.	Gender of Person filing Grievance	() Male () Female
5.	Contact #s of Person filling Complaint	
6.	Name and contact # of Community Representative Present	
7.	Preference for anonymity or confidentiality	() Yes () No
8.	<p><u>Nature of Grievance/Complaint:</u></p> <p>Unfair Compensation b. Disputed Ownership of Property</p> <p>Consultation d. Affected by Project Activities</p> <p>Others (Please Specify):</p>	
9.	Description of Grievance/Complaint:	
	Feedback from Grievance Committee/Officer:	
	Proposed Date for Investigation:	
10.	Date of Investigation	
11.	Was Complainant Present?	Yes 2. No
12.	Was Field Verification of Grievance/ Complaint Conducted?	Yes 2. No

13.	Findings of Field Verification/Complaint:	
14.	Summary of Investigative Decision:	
15.	Was Agreement Reached?	Yes 2. No
16.	If Agreement Was Reached, Please Detail Agreement:	
17.	If Agreement Wasn't Reached, Please Detail Disagreement:	
18.	Any Pending Issues? Please State:	
19.	Duration of complaint investigation and Resolution: (1-2 Weeks) B. (2-3 Weeks) C. (3-4 Weeks) D. (5 Weeks and above)	
20.	Name & Signature of Community Liaison/Safeguard Officer (Investigator)	
21.	Signed Complainant	
22.	Signed Independent Observer (Witness)	
23.	Complaint Resolution/Transfer Date	



Republic of Liberia

CHEESEMANBURG LANDFILL URBAN SANITATION PROJECT (CLUS)

PROJECT IMPLEMENTATION UNIT (PIU)
Monrovia City Corporation Compound
UN Drive and Lynch Streets, Central Monrovia
P. O. Box 9029
1000 Monrovia, 10 Liberia



Email: clusproject2017@gmail.com

Tel: (+231) 778-752-872

CERTIFICATION OF GRIEVANCE RESOLUTION FORM

I _____ the undersigned certify that I am in full agreement, and satisfy with the decision reached in redressing my complaint.

Summary of Complaint	
Complaint Registration Date	
Agreed Decision Reached	
Date of Complaint Resolution	

Signed: _____

Date: _____

Contact #:

Witness: _____

Date: _____

Full Name:

Contact #: