

Environment & Social Framework for IPF Operations

Good Practice Note

Managing the Risks of Projects Involving Protected and Conserved Areas

Annex XI

The following annex is part of the GPN on Managing the Risks of Projects Involving Protected and Conserved Areas. For ease of use, it will be uploaded as a separate file and will have links provided to it in the full text of the GPN, which will also be available online at the following URL:

<https://thedocs.worldbank.org/en/doc/345f6737b55b565433d838862b5d56f9-0290012026/original/pca-gpn-with-annexes-i-iii.pdf>

Annex XI. Designing and Implementing Grievance Mechanisms (GMs) in Protected Area Projects

The following annex is part of the Good Practice Note on Managing the Risks of Projects Involving Protected and Conserved Areas, which is accessible at the following URL:

<https://thedocs.worldbank.org/en/doc/345f6737b55b565433d838862b5d56f9-0290012026/original/pca-gpn-with-annexes-i-iii.pdf>

1. A Grievance Mechanism (GM) is a locally based, non-judicial system to receive, assess, record, and resolve community feedback or complaints. The design and implementation of GMs follow the requirements of the Environmental and Social Framework (ESF), especially Environmental and Social Standards (ESSs) 5 and 10. However, specific challenges may hinder the optimal functioning of such GMs in projects involving Protected and Conserved Areas (PCAs). This annex describes specific challenges, suggested solutions, and examples concerning GMs in PCAs from projects by the Bank and others.

2. Most projects involving PCAs will have a Livelihood Restoration Plan (LRP) or Process Framework (PF) (see Issue 4 in the GPN). The design of the GM needs to be aligned with the PF or LRP and other project environmental and social (E&S) documents, including Stakeholder Engagement Plan (SEP), Resettlement Plan (RP)/Resettlement Policy Framework (RPF), Indigenous Peoples Plan (IPP)/Indigenous Peoples Planning Framework (IPPF), and with PCA management plans, and governance arrangements.¹ The GM structure should be developed in consultation with stakeholders to ensure it appropriately addresses the project's specific issues and aligns with the local culture of dispute resolution. For more details, see the GM Checklist at the end of this Annex.

Table XI.1: Characteristics of Good Practice GMs

| | |
|---|---|
| Accessibility and diverse uptake channels | Transparency and accountability |
| Clear procedures and timeliness | Adaptive management |
| Fairness and impartiality | Adequate capacity and resources |
| Availability of anonymous complaints | Protection of confidentiality and anti-retaliation measures |

Key Challenges, Recommendations and Project Examples for GMs in PCAs

3. **Complexity of Issues and Related Grievances in Protected Areas:** PCA management often involves complex issues related to land tenure, access restrictions, benefit sharing, human-wildlife conflict, and other issues. The GMs should be capable of addressing this range of issues, supported by specialists in PCA management with a nuanced understanding of local socio-ecological contexts. The GM Checklist outlines key elements that should be considered when designing and implementing GMs for PCA projects.

4. Teams are advised to anticipate the types of grievances that could arise; conduct a thorough mapping of related agencies, local/existing mechanisms and institutions for handling complaints; and design a robust referral system built into the GM. This system should be able to identify and refer various issues to the appropriate agencies for resolution. For example, human-wildlife conflict usually falls under the responsibility of park rangers, while land disputes are managed by land agencies. The GM and referral structures must have the capacity and commitment to address issues that are core to project activities

¹ A GM may be included in the PF, if applicable, but the project GM needs to cover grievances unrelated to access restrictions and may need to be separately set out in the SEP or RP. In some cases, the project GM can serve as a second level of review (a kind of appeal) for the more local and specialized GM included in the PF.

and the PDO, or adaptive measures need to be included in the project to manage cases where these disputes cannot be resolved.

Example 1: Developing Effective Sorting and Referral Systems: Defining the Scope of the GM

In various countries, GMs have defined the scope of matters they can address, based on the presence of other authorities handling specific types of grievances. It is essential to inform beneficiaries about which entity is responsible for each type of grievance, including worker grievances. If a grievance falls under the jurisdiction of another agency, the GM should facilitate its referral to the appropriate entity. This requires inter-agency coordination and due diligence to ensure that all responsible agencies have enough capacity to address the grievances adequately, in a fair and transparent way. In [Sri Lanka \(P156021\)](#), [Argentina \(P175669\)](#) and [Colombia \(P144271\)](#), specific authorities designated by the government deal with land disputes, while the GM is focused mostly on other project-related issues.

5. **Insufficient accessibility and inclusiveness of the GM:** PCA projects often involve remote communities across vast areas that may be marginalized. Affected communities may not know about the GM and how to access it if needed. They are often Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (IPs/SSAHUTLCs) or other traditional forest communities, with low literacy, language barriers, cultural sensitivities, and limited communication channels.

6. To overcome these constraints, projects should ensure diverse channels exist to raise awareness and proactively communicate the existence of the GM (signs, radio, local assemblies, community role play) and how to lodge complaints (mobile technology, Kobo toolbox, and community facilitation). The GM should support local languages, have clear procedures, provide public information, and include regular dissemination, monitoring, and evaluation. Implementation should involve local partnerships and support from cross-functional teams in implementing agencies. Training and capacity building for local organizations should be offered. The mechanism should be free of charge, as required by the ESF, and offer logistical support for vulnerable stakeholders to participate. Local focal points and civil society organizations (CSOs) can be trained to help communities understand their rights and access GMs. Feedback on complaints and their resolution should be periodically reported to stakeholders.

Example 2: Colombia Forest Conservation and Sustainability in the Heart of the Colombian Amazon (P144271)

The project covered 11.5 million hectares and the communities living in the area, including IPs, were remote, had limited literacy and spoke different languages. To overcome this challenge, the project built on existing GMs of partner agencies (Ministry of Environment and Sustainable Development, the Sinchi Institute—*Instituto Amazónico de Investigaciones Científicas*, national natural parks, Institute for Sustainable Development in the South of the Amazon), which had a strong positive presence in the communities and a good understanding of their culture. In addition, they received training from the project implementation unit on Bank policy and guidelines.

The project GM was tailored to accommodate varying forms of communication, community leadership structures, and conflict resolution mechanisms within each community. For example, in the indigenous communities of the Caquetá region, grievances and other matters of collective interest were discussed in community assemblies and then channeled to the project through facilitators in different project areas. In Bajo Caguán, grievances were addressed by a monitoring committee, elected through a community assembly. This committee was responsible for processing petitions and disseminating responses. For the IPs in voluntary isolation in the Chiribiquete National Park, who do not take part in project activities yet live in neighboring areas and have concerns about the project, the receipt and investigation of complaints

was administered by their governor, with the support of other authorities and a representative of a community association of the IPs.

7. The **private sector** can play a multi-faceted role in **grievance management in protected and conserved areas (PCAs)**, particularly when it is engaged in activities such as tourism, natural resource use, infrastructure development, or conservation financing. It is important to ensure that the GM has scope to cover activities sponsored, financed, or implemented by private actors in or near PCAs. Private contractors, concessionaires, and financiers involved in project-related activities need to agree to participate in the GM and adhere to project guidelines.

8. **Low trust towards the GM:** Communities may distrust the GM if they perceive it as being biased towards the project proponent or government agencies or have little confidence that their issues will be effectively addressed. Maintaining independence and impartiality in handling grievances is essential but often challenging, also due in part to power imbalances. Significant power disparities often exist between project-affected people (especially IPs/SSAHUTLCs) and project implementers or government bodies. In PCAs, it is important to consider “historical legacies” that may affect trust between communities and park authorities. These legacies may stem from the way in which national parks and protected areas were created in the first place.

9. Active stakeholder engagement is critical for building trust, as are feedback mechanisms (e.g., beneficiary surveys), transparency (clear procedures that are well-advertised and implemented as advertised, community representation in grievance committees), and accountability (adequate responses to community needs and preferences).

Example 3: Using third parties to establish trust in addressing grievances: The cases of Argentina and Mexico

[The Sustainable Landscapes and Livelihoods in Argentina \(P175669\)](#) exemplifies the integration of trust-building and perceived independence through collaboration with a credible agency supporting the GM function. In Argentina, the Bank has been engaged in PCAs since the end of the 1990s, consistently working with the same implementing agency, the National Parks Authority (*Parques Nacionales*). For the past several decades, this federal and independent agency has adopted a participatory approach in implementing its Management Plans, available on the National Parks website for each park. This participatory approach, which includes the private sector and civil society, has facilitated continuous dialogue with various communities and resulted in agreements regarding livelihoods, resource use, and land, allowing concerns to be addressed before they become grievances.

The Dedicated Grant Mechanism for Indigenous Peoples and Local Communities Project in Mexico was another good example of building trust using a third party to operate the GM. The project’s GM (known by its acronym SIRASIQ) was managed by the Rainforest Alliance, an international nongovernmental organization (NGO). The GM was accessible via the web, email, and telephone. It was available in the subproject sites through mailboxes or community access points. Information was shared on site via “transparency boards” and electronically. The information was provided in a culturally appropriate manner, with local community promoters translating it into indigenous languages.

10. **Fear of Reprisal:** Individuals may fear retaliation if they voice complaints against powerful actors involved in the project. Some activities of local communities may be illegal or perceived as illegal in the context of PCAs. In addition, PCA authorities with a rules enforcement mandate may be in charge of the GM. Therefore, people may be reluctant to submit complaints and feedback. Ensuring confidentiality and

protecting complainants from reprisal is essential but can be difficult to guarantee. Here are some measures that can help prevent retaliation or address it should it occur:

- Design safe and anonymous reporting channels: Allow complaints to be submitted anonymously or through trusted intermediaries (e.g., indigenous leaders, women’s groups, conservation NGOs, or park advisory councils); use secure complaint boxes, toll-free hotlines or SMS codes that do not require identity disclosure; include digital and in-person options that do not leave a trail (e.g., avoiding sign-in sheets).
- Develop and share a clear anti-retaliation policy specific to PA contexts: Establish an anti-retaliation policy (related to conservation enforcement, land access restrictions, or ranger behavior) and distribute it to beneficiaries and implementing agencies (it can be included in the GM manual and in the SEP).
- Train staff and implementing partners on non-retaliation principles, confidentiality, and trauma informed practices for GM focal persons, PCA authorities, community facilitators. Emphasize non-retaliation in contractual obligations of third-party implementers.
- Share a clear non-retaliation message during stakeholder meetings, on posters, on local radio, and in oral briefings.
- Communicate with the person who complained or reported wrongdoing and demonstrate that the complaint is taken seriously.
- Provide independent oversight: Establish and disseminate an alternative (preferably independent) channel to receive complaints about threats and retaliation or to bypass individuals or agencies that are seen as potentially retaliatory.
- Make sure that the beneficiaries understand that retaliation will not be tolerated, and violators will be disciplined.

Example 4: How can the KoboToolbox² help with anonymity and confidentiality?

- Anonymized Forms: Kobo can be set up to avoid collecting personal identifiers unless absolutely necessary, protecting respondents’ identities.
- Skip Logic & Encryption: Sensitive questions (e.g., related to retaliation or abuse) can be shown only when relevant. Data can be encrypted at rest and in transit, ensuring secure handling.
- Offline Capability: Data can be collected offline in areas with limited connectivity and uploaded when secure internet is available, reducing risks of surveillance or interception.
- Role-Based Access Control: Kobo allows setting different user permissions so only authorized personnel can access sensitive grievance information.
- Multilingual and Culturally Appropriate Forms: Forms can be translated into local languages and adapted culturally, making it safer and easier for marginalized groups to report issues

11. **Insufficient reliance on traditional/local dispute resolution mechanisms:** Failure to recognize and appropriately build a GM on existing traditional or community-based dispute resolution mechanisms can lead to the GM being perceived as externally imposed, impractical, or culturally inappropriate. Building GMs on local grievance systems is especially critical for PCAs, as they may help implementation by: (i) reducing the skepticism about the GM; (ii) showing cultural sensitivity and relevance; (iii) potentially

² KoboToolbox is a free, open-source suite of tools for data collection and management, particularly favored in humanitarian and development work. It allows users to design and customize forms for data collection, gather data both online and offline, and analyze the collected data. Key features include user-friendly form building, offline data collection capabilities, and tools for data analysis and visualization. The World Bank’s Geo-Enabling Initiative for Monitoring and Supervision (GEMS) promotes the use of KoboToolbox in difficult contexts in Bank operations.

reducing costs associated with formal mediation or litigation; (iv) generating improved access to justice, ensuring all voices are heard; (v) preventing grievances from escalating to larger conflicts; and (vi) facilitating a greater sense of ownership and accountability for all parties involved. Some examples include traditional leaders or elders who may play a role in resolving disputes, informal mediation processes, local councils, or forums.

Example 5: Incorporating community-based mechanisms into GM: The case of the Philippines

The Energy Development Corporation geothermal project, in Mt. Apo, Philippines is funded directly by the government of the Philippines. It has 43 years of experience in robust stakeholder engagement and the implementation of a GM that integrates traditional/local dispute resolution mechanisms. At the core of the system are three local and tribal authorities of the Obo Munuvu Tribe residing within the protected area housing the geothermal plant. These entities include the Indigenous Peoples organization representing the Munuvu-Apao Descendants Ancestral Domain of Mt. Apo, the Barangay Local Government Unit, and the Barangay Tribal Council. They receive and categorize the complaints, determining who is responsible for answering them.

12. **Delays in resolving grievances:** Delays in resolving grievances can escalate tensions, the risk of protests, legal challenges, and even violence. The capacity of the GM to deliver fair and timely solutions is often constrained by bureaucratic processes, limited resources, and insufficient authority to enforce resolutions.

13. For timely and effective resolution of disputes, teams are encouraged to: (i) assess and address bureaucratic hurdles or insufficient authority to enforce resolutions during GM set-up; (ii) provide clear mandates for decision-making and necessary capacity building/technical assistance for the agencies involved; (iii) allocate sufficient resources for the GM; (iv) utilize available technologies to speed up the resolution process while maintaining face-to-face interactions; (v) ensure the designated agency and GM coordinator have the authority to decide who handles complaints and by when and the resources to implement resolutions, including compensation where appropriate; and (vi) ensure that all project parties are aware of the GM and are committed through their contracts, plans and codes of conduct, as applicable, to cooperate with the GM and to abide by its decisions.

Example 6: Utilizing Available Technologies for speedy and efficient resolution of grievances: KoboToolbox (GEMS)

Several Bank projects in PCAs such as **Colombia:** *The Forest Conservation and Sustainability in the Heart of the Colombian Amazon*, the [Maldives Clean Environment Project \(MCEP, P160739\)](#); and the **Sri Lanka:** *Ecosystem Conservation and Management in Sri Lanka (P156021)* have incorporated the use of the KoboToolbox (GEMS). The KoboToolbox enhances the resolution process by improving backend technologies responsible for processing collected grievance data. This tool has several advantages, since it does not require internet access, and translates to several languages automatically. The facilitators can use the tool in the field to send text messages, while listening to grievances. It allows for the processing of responses much quicker, and the Bank provides technical assistance for its implementation.

Grievance Mechanism (GM) Checklist for Projects in Protected and Conserved Areas

1. Project Preparation Phase

A. Scoping

- Has the Bank assessed the grievance landscape, namely the local context, historical tensions, conflicts in the area, types of grievances likely to arise for PCAs related to this project which may impact GM design?
- Does the GM address all types of E&S impacts related to PCAs identified in E&S assessments, including those related to land access, natural resource use, resettlement, human-wildlife conflict, biodiversity, access restrictions, and behavior of rules enforcement personnel?
- Are all relevant stakeholders in or near the PCA—including IPs/SSAHUTLCs, traditional land users, and marginalized groups—included in consultations on the GM design?
- Does the mechanism provide culturally appropriate, accessible outreach and intake channels for all affected groups—including those in remote, forested, or mountainous areas?
- Does the design reflect constraints such as poor connectivity, low literacy, or language diversity?
- Are key local, regional, and national authorities (e.g., PCA authorities, traditional leaders, land commissions, tourism operators) identified and engaged to support grievance resolution?

B. Planning and Integration:

- Was the GM discussed during project preparation, with identification of potential grievances specific to PCA contexts (e.g., human-wildlife conflict, access to PCA resources for grazing, fishing, hunting, cultural and other uses, tourism impacts, enforcement)?
- Is the GM referenced in all relevant safeguard/ESF documents (e.g., SEP, IPPs, RPs, PFs, LRP)?
- If applicable, is the GM aligned with the LRP, PF?
- Have existing formal and informal GMs in the PCA context (e.g., community-level conflict resolution, park authority processes) been mapped and assessed?
- For large or remote PCAs, have partnerships with NGOs or local actors already present on the ground been explored to help implement the GM?
- Has the Bank explored stakeholders' preferences on how they wish to raise grievances and receive responses?
- Does the GM include measures to enhance trust and perceived independence (e.g., third-party facilitation, community representation in grievance committees)?
- Are private sector actors operating in or near the PCA included in GM design and implementation?
- Have the rights and frameworks applicable to IPs/SSAHUTLCs been considered?

C. Design and Documentation:

- Is the project GM accessible, timely, and effective across all PCA locations?
- Is the GM described in project documents before appraisal?
- Is there a clear timeline for each grievance milestone (submission, response, appeal, closure)?
- Does the GM include:
 - Types of grievances that can be received?
 - Flexible intake options (e.g., community meetings, mobile teams, radio call-ins, suggestion boxes)?
 - Process for submission (including anonymous options)?
 - Adequate staffing, including community-based or NGO partners in remote zones?

- A referral pathway for disputes requiring external resolution (e.g., land courts, wildlife authorities)?
- Protection of complainant confidentiality and zero tolerance for retaliation, with alternative channels and oversight?
- Anti-retaliation policy and training for GM staff?
- Protocols for Sexual Exploitation and Abuse (SEA/SH) and Gender-based Violence (GBV)-related grievances, with confidentiality and survivor-centered approaches?
- Protocols to address the cultural and legal aspects related to IPs/SSAHUTLCs?
- Guidelines specific to labor complaints (e.g., guidelines involving contractor responsibilities for workers' grievances)?
- A database or log system to track grievance status and outcomes?
- An adequate appeals process, including the project management level?

D. Budgeting and Resourcing

- Is the GM fully costed in the project budget, with attention to PCA-specific needs like mobile access, field visits, and translation?
- Are implementation costs itemized by level (e.g., village, park, national)?
- Are necessary procurement items (e.g., hotline systems, radios, solar phones, mobile units for remote outreach) included?
- Are awareness-raising and capacity-building activities budgeted for all agencies likely to receive or handle complaints?
- Are third-party channels explored as an additional tool and budgeted if needed?

2. Project Implementation Phase

A. Operationalization

- Is the GM operational and functional in practice?
- Are grievance uptake channels, timeframes, and vulnerable group support detailed in the Project Operational Manual?
- Are roles and responsibilities clearly defined for all institutions involved—both project agencies and external actors (e.g., park rangers, local government, traditional leaders)?
- Is the GM known and accessible to affected communities in local languages and through culturally appropriate channels?
- Is support available to vulnerable groups (administrative, legal, physical access)?

B. Complaint Handling Process

- Are grievances acknowledged, assessed, and responded to through transparent procedures?
- Are complainants kept informed throughout the process? Are responses documented and agreed upon?
- Are grievances resolved in a timely manner?
- Is there follow-up to confirm resolution and satisfaction?
- Are confidential and anonymous complaints securely managed, including those involving threats of retaliation?
- Is the GM linked to the project's core decision-making processes to ensure timely escalation?

- Have all relevant actors (e.g., PCA authorities, local CSOs, community leaders) been trained on GM procedures and ethics?

3. Monitoring and Reporting

- Is grievance data reported regularly in Aide Memoires, Implementation Status Reports, and other project reports?
- Do reports track:
 - Number and types of grievances?
 - Resolution rates and satisfaction?
 - Trends, such as recurring or escalating issues (e.g., land boundary disputes, wildlife crop damage)?
- Are unresolved grievances monitored and flagged for attention?
- Are communications with complainants tracked and reported?

4. GM Performance and Effectiveness

- Are all cases logged, recorded, and reported, including to top project management?
- Is data on cases broken down by location, affected group and type of complaint?
- Are most PCA-related grievances addressed through the GM? What proportion are not, and why?
- Are users generally satisfied with the process and outcomes?
- Are issues and resolutions reported to community?
- Are grievances resolved within agreed timeframes?
- Is project management proactively addressing root causes of common grievances (e.g., poor communication about conservation rules, exclusion from benefit sharing)?
- Is the GM reviewed and improved based on feedback and lessons learned?