

Improvement of Grievance Redress Mechanism for Implementation of Development Projects. The Case of GRM in SGR Project in Tanzania

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Abstract

Grievance Redress Mechanisms (GRM) are prepared within a framework of the International Financial Institutions (IFI) requirement for implementation of development projects in the developing countries. However, the established GRM are not used by most of the Affected Persons (AP). This study explored development of GRM and find-out how they are used for the purpose of improvement. The study employed qualitative research approach of which qualitative data collection methods such as interviews, focus group discussion, public meetings and socio-economic surveys were applied. The SGR Electrification Project from Dar es Salaam to Dodoma with a total of 2932 AP was selected as a case study. The methods used for data collection involved the use of tablets installed with Open Data Kit (ODK) to cover all the APs. From ODK, these data were received from ODK Server in excel format, cleaned and exported to SPSS files for analysis. The findings show that 26% of the APs use the established GRM to lodge their grievances of which 94% of them did not receive feedback and there is no communication. Also, about 99% of the grievances are related with compensation. Thus, the AP found alternative ways by using procedural methods used in land acquisition and compensation for addressing of their complaints. Likewise, pastoralists used community and traditional methods for communication and addressing grievances. It is concluded that GRM prepared according to IFI requirements are not used as intended. It is therefore, recommended to improve the GRM by integrating procedural methods of settling disputes used in land acquisition and compensation, integrating community and traditional dispute settlement mechanisms, improved representation of AP in the GRC and reduction of time required for GRM process and feedback.

Keywords

Grievance Redress Mechanism, Standard Gauge Railway and Project Affected

Persons

1. Introduction

Grievance is defined as an actual or perceived problem that might give grounds for complaints (Georgia, 2014). Grievance is also defined as a concern or complaint raised by an individual or a group of people within a community affected by the project or company operations. Both concerns and complaints can result from either real or perceived impacts of a project or company's operations (IFC, 2009). Thus, Grievance Redress Mechanism (GRM) is defined as a process for receiving, evaluating and addressing project-related grievances regarding the project activities or project's social and environmental performance from the affected communities at the company or project level (ADB, 2009; Georgia, 2014; IFC, 2009).

The essence behind GRM emanated when the governments became responsible with the assessment and management of environmental and social risks and impacts in planning, design and implementation of development projects. This happened when governments are involved in early planning and decision making of development of projects that involve site selection and/or design. It also happened when governments are involved in providing land for development of projects that may include resettlement of the affected communities, individuals or that which may lead to loss of biodiversity (IFC, 2012).

Development projects in different countries established GRM that set out the process and procedures that enable the Affected Persons (AP) to voice any grievance to be heard and addressed (Georgia, 2014; MPL, 2020). Also, those seeking grievance redress are given the choice to accept mediation or to seek redress at a higher level (Georgia, 2014; Noi, 2011).

However, most of the GRM are prepared within a framework of the International Financial Institutions (IFI) for the purpose of securing funds for implementation of development projects. For instance, GRM for the Gulpur Hydropower Project in Pakistan was established according to the requirements of the International Finance Corporation (IFC) Performance Standards (PS) and Asian Development Bank (ADB) Safeguard Policy Statement (SPS) (MPL, 2020). GRM for the Adjaristsqali Hydropower Project in Georgia (formal process) was prepared according to the requirements of the IFC-PS (Georgia, 2014). GRM for the Trung Son Hydropower Project in Vietnam (formal process) was established within a framework of the World Bank's Safeguard Policies (WB-SP) for Indigenous Peoples (World Bank, 2013a; Noi, 2011) and for Involuntary Resettlement (World Bank, 2013b; Noi, 2011). Also, GRM for the Kapshagai-Kurty Road Project in Kazakhstan was established within a framework of the Performance Requirements of the European Bank for Reconstruction and Development (Zeinullina, 2018).

There are various mechanisms that allow the aggrieved parties access redress.

ADB (2010) categories the mechanisms using systems and institutions. These are then divided into three groups which are affected/concerned parties, the systems and institutions at national level and at international level. The affected parties are individual persons or groups; at national level the systems and institutions include legal system, project specific-GRMs, Public Administration, and peoples' representatives/parliament while international level includes organizations such as Asian Development Bank (ADB). The international aid agencies for GRM play their roles through performing generic functions which are not exclusively geared toward addressing project-specific grievances and circumstances, nor can they be accessed by all APs (CEPA, 2009). **Figure 1** shows the overview presented systems and institutions for grievance redress mechanism.

The GRM is important in providing the predictable, transparent, and credible process to all parties of which creates outcomes which are fair, effective, and lasting (ADB, 2010). A well-functioning GRM is crucial in providing the benefits to both project and the APs. **Table 1** summarises the benefits of GRMs.

In the scenario where there is no project-specific GRM, APs are required to seek solutions to their grievances through GRMs that exist outside the project including the country's judicial system, public administration, or the agencies that funded the project. Looking for external GRM have been narrated by ADB (2010) that it leads to a number of negative effects or impacts to both project and APs, for example;

- Could absorb relatively longer duration of time and resources which are usually unaffordable to the APs.
- Not all APs have capacity of accessing the outside GRMs. This could deprive their rights to be heard and to find fair and solutions to their claims of complains. This would bring the APs to the state of being vulnerable, and insecure.
- Depriving the APs from accessing the GRMs could lead to the failure of implementation of the project though developing the hostility and violence toward the project.
- Delays of the project implementation of which will then increase the government expenditure.

Moreover, NIE (n.d.) portrays seven principles to be considered in GRMs of which are; accessibility of the created mechanism to the project APs, predictability of both mechanism and the response to be taken, fairness of all procedures taken to resolve the grievance, rights compatibility, transparency and accountability, capability for an effective GRM, and feedback.

MOF, MOIID and GIZ (2021), UNDP (2017), NIE (n.d.), and ADB (2010) document on the key procedures or steps to be followed in GRMs. There are seven common stages in GRMs of which are; a) receiving and registering grievance; b) acknowledging, assessing and assigning; c) proposing the response; d) agreement on the proposed response; e) implementing the agreed response; f) review; and g) referring grievance of closing. However, the depicted processes by the researchers and legal frameworks are not within the APs' preferences and

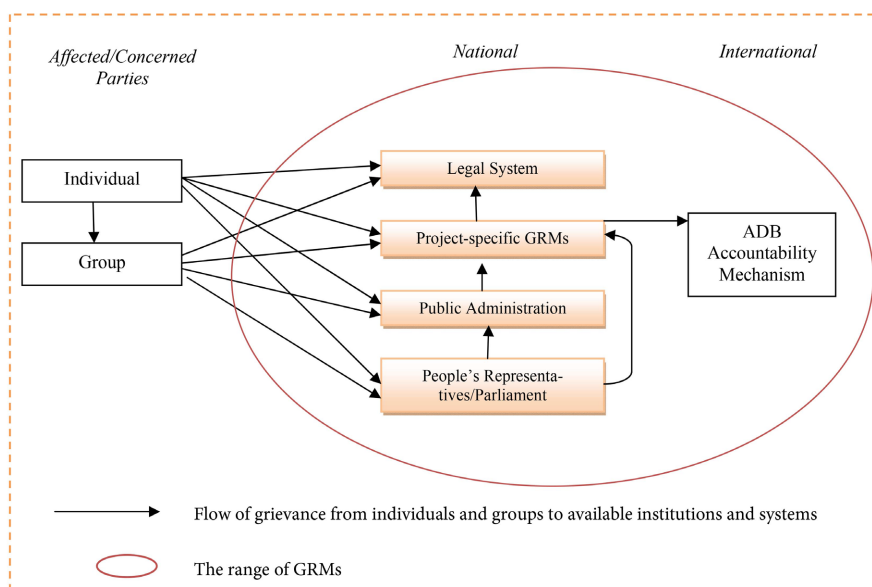


Figure 1. Systems and institutions for grievance redress available to affected persons. Source: ADB (2010) and CEPA (2009).

Table 1. Benefits of grievance redress mechanism.

Benefits to Projects	Benefits to Affected Persons and Other Stakeholders
Provides information about project implementation	Provides a cost-effective method to report their grievances and complaints
Provides an avenue to comply with government policies	Establishes a forum and a structure to report their grievances with dignity, and access to a fair hearing and remedy
Resolves disputes relatively quickly before they escalate to an unmanageable level	Provides access to negotiate and influence decisions and policies of the project that might adversely affect them
Facilitates effective communication between the project and affected persons	Facilitates access to information
Helps win the trust and confidence of community members in the project and creates productive relationships between the parties	-
Ensures equitable and fair distribution of benefits, costs, and risks	-
Mitigates or prevents adverse impacts of the project on communities and produces appropriate corrective or preventive action	-
Helps avoid project delays and cost increases, and improves quality of work	-

Source: ADB (2010).

not effectively followed by the APs. There is general knowledge of the GRM that are prepared within a framework of IFI requirements but researchers have seldom conducted empirical studies to examine their implementation. This gap motivated the researcher to carry out a study on that important topical issue for the purpose of improvement. This study is conducted to assessing the stages taken in GRM for the APs during SGR Power Supply in Tanzania so as to see how the processes are compatible to the legal frameworks and other researches and how the improvements can be made.

2. Methodology

2.1. Research Design

The study employed qualitative research design of which includes purposeful sampling, collection of open-ended data, analysis of text or pictures, representation of information in figures and tables, and personal interpretation of findings (Creswell, 2009). In this approach, the study applied qualitative data collection methods including public meetings, focus group discussion, interviews and socio-economic surveys while gathering the required data. Moreover, the study used tablets installed with Open Data Kit (ODK) Collect v1.28.2 software for data collection. Thus, ODK was used for data collection through Socio-Economic Surveys to cover all AP. The same was also used for Public Meetings, Focus Group Discussions and Key Informant Interviews. Kobo Toolbox (ODK Server) was used to receive data from ODK for analysis in excel format. Before analysis, these data were cleaned and exported from excel to SPSS files.

2.2. Research's Case Study

The 502.4 Km (4344.95 Acres) of 220kV Transmission Line from Dar es Salaam to Dodoma-Makutupora for the Standard Gauge Railway (SGR) Project Power Supply was selected as a case study. Within this area, Lot 1 from Dar es Salaam to Morogoro covers 166.4 Km with 1439.09 Acres while Lot 2 from Morogoro to Dodoma-Ma-kutupora covers 336.0 Km with 2905.86 Acres. This area includes 5 regions, namely Dar es Salaam, Pwani, Morogoro, Dodoma and Singida with a total of 2932 APs.

3. Adopted Process of GRM in SGR Project in Tanzania

The GRM for the 220 kV Transmission Line Project from Dar es Salaam to Dodoma-Makutupora for the SGR Power Supply was prepared to address all grievances emanated from the project. The prepared GRM was in line with the IFC-PS requirements (IFC, 2012; IFC, 2009). The processes consisted five steps, namely receipt and registration, screening and prioritization, investigation, resolution and feedback as well as monitoring and evaluation.

Step one that involves receipt and registration of grievances require complainants to submit a grievance verbally or in writing by using Project Grievance Form (PGF) to their respective Village/Mtaa Chairman or Local Government

Authority and/or Suggestions/Feedback Boxes available in the impacted villages along the Project corridor. Grievance filing procedures by using PGF is required to be easily accessible and culturally appropriate for the AP regardless of education levels, gender or other access issues. Thus, PGF have been made available in both English and Swahili languages whereas assistance is provided when necessary to account for any literacy, language, or cultural barrier that might otherwise prevent an aggrieved person from registering a grievance/complaint related to the Project. Verbal grievances are communicated in-person or via telephone to their respective village chairman or local authority, Community Liaison Officer (CLO), and client or contractor staff at construction sites receive and register them by using PGF. This IFC-PS requirement of using PGF is similar to the Performance Requirements of the European Bank for Reconstruction and Development (European Bank, 2019) that was applied in Kapshagai-Kurty Road Project in Kazakhstan (Zeinullina, 2018).

RAP Implementation Team that is similar with Grievance Redress Committee (GRC) was established to receive and compile grievances on weekly basis and address them. Members of the RAP Implementation Team consist of five persons that were appointed by the client (TANESCO). They are 1) Project Engineer, 2) Land Surveyor, 3) Sociologist, 4) Environmentalist, and 5) Valuer. In-terms of size of the team, it is similar with other countries. In Georgia, the GRC consisted of about five to seven members. They are 1) representatives from the Project, firstly a person who is familiar with land acquisition and secondly, the Community Liaison Officer; 2) representative of the local municipality that may be a member of the cadastral land services, agricultural department or other relevant section; 3) village head; and 4) a representative of the community who is not directly affected by the grievance in question (Georgia, 2014). The difference between Tanzania and Georgia stands on composition of the team. In Tanzania, all members are from the project (TANESCO) while in Georgia only 2 out of 7 members are from the project of which the AP are well represented.

This IFC-PS requirement of establishing GRC is similar to the ADB-SPS requirement (ADB, 2009) that was applied in Gulpur Hydropower Project in Pakistan (MPL, 2020) and the ADB GRM that was designed and implemented in Transport Projects in Sri Lanka (ADB, 2010). GRC was also introduced in Adjistsqali Hydropower Project in Georgia through application of the IFC-PS (Georgia, 2014). Therefore, RAP Implementation Team that is similar with GRC was responsible for receiving grievances from the Village/Mtaa Chairman or Local Government Authority through the nearest TANESCO District Office as well as compiling newly registered grievances as soon as they are directly submitted to them in other ways, such as the established Call Centre or the provided mobile number.

Valuation grievances that cannot be addressed by the RAP Implementation Team were forwarded to the consultant/expert who did valuation for land acquisition and compensation. Furthermore, an opportunity was given to the unresolved grievances by the RAP Implementation Team to be referred to the exter-

nal mechanism of judicial proceedings. It is also explained by IFC (2012) that GRM should not hinder access to judicial remedies. Other cases in the world, such as GRM for the Adjaristsqali Hydropower Project in Georgia (Georgia, 2014) and the GRM formal process of the Trung Son Hydropower Project in Vietnam (Noi, 2011) also provides an opportunity of the unsettled grievances to the court of law as the last resort. All aggrieved parties are given the option to remain anonymous throughout the process of GRM.

Step two involves screening and prioritization of the grievances. Asian Development Bank-Safeguard Requirements (ADB, 2009), European Bank (2019) and the World Bank (World Bank, 2013a, 2013b) also supports screening and scooping of grievances. Thus, grievances that have not been resolved at the local level are classified and prioritized by the CLO with support from the Social Expert. The Social Expert supports the CLO team to determine the potential social risk and subsequent steps for investigation. This may require reviewing records of similar events, availability of evidence and supporting documents. Thus, grievances are classified into six categories as shown in Table 2 respectively.

Based on the circumstances of the complaint, all resettlement related grievances (Categories 1, 2 and 3) are reviewed by RAP Implementation Team for resolution. Other grievances (Categories 4, 5 and 6) are forwarded to the relevant authorities, contractor or project department for the proposed resolutions.

Step three involves grievance investigation for resolution. Asian Development Bank (Safeguard Requirements) and the European Bank also supports grievance investigations (ADB, 2009; European Bank, 2019). At this stage, additional information may be required to clarify the situation and/or improve communication between the complainant and the client. Also, it may be necessary to introduce mitigation measures to prevent the problem from recurring in the future. Where these cases occur, the RAP Implementation Team is required to organize telephone or face-to-face meetings to investigate the complainant's allegations as well as verify the validity and/or gravity of the grievance. If the grievance relates to a specific site or location, the RAP Implementation Team organizes a site inspection. Furthermore, the team gathers supporting information to identify corrective or preventive measures to properly address the grievance including photographs and/or other documentary evidence.

Step four involves resolution and feedback. Asian Development Bank (Safeguard Requirements) and the European Bank also supports resolution and grievance feedback (ADB, 2009; European Bank, 2019). At the completion of investigations, the RAP Implementation Team is required to draft a formal communication to the complainant detailing the investigation findings as well as any proposed response. The RAP Implementation Team is required also to communicate the response, discuss any mutual commitments and ask for the complainants' agreement. If the complainant is not satisfied with the resolution, or the outcome of the agreed corrective actions, the response should be reviewed and (if

Table 2. Classification of grievances.

No.	Classification
Category 1	Safeguard grievances including compensation disputes, land allocation and delays in compensation.
Category 2	Grievances regarding violations of the Tanzanian land laws and regulations, policies, guidelines and procedures as well as misconducts.
Category 3	Grievances regarding contract violations such as between village authorities and the contractor on the lease of borrow pits, private land lease for camp constructions, etc.
Category 4	Grievances regarding abuse of power/intervention by project or government officials.
Category 5	Grievances regarding construction misconducts and violation of safety and precautions by the construction personnel.
Category 6	Grievances on sexual abuse, harassment and misconducts by any project related persons.

Source: ADB (2009), EBRD (2019), World Bank (2013a) and World Bank (2013b).

appropriate) amended in light of further discussion/negotiation. Formal responses will include:

- Compilation of photos or other documentation of the grievance;
- A record of the date and time the resolution was presented, a summary of corrective actions; and the signature of responsible Project staff;
- A record of the meeting with the complainant to form a collective agreement of closing out the claim; and
- Where issues are resolved to the satisfaction of the complainants, a confirmation of agreement that will be filed along with the case documentation and the grievance will be closed.

Grievance feedback should be provided to complainants within fifteen (15) days of receipt of the initial grievance and the same should be resolved within six (6) months. If more time is required, this will be communicated clearly in advance to the concerned party. Where the complainant is satisfied with the response provided to the grievance, the RAP Implementation Team will close-out the grievance in the grievance database. The aggrieved party will also retain the right at any point throughout the process of GRM to appeal to judicial recourse.

Step five involves grievance monitoring and evaluation. Asian Development Bank-Safeguard Requirements (ADB, 2009, 2010), European Bank (European Bank, 2019) and the World Bank (World Bank, 2013a, 2013b) also supports grievance monitoring and evaluation. At this stage, all correspondence and corrective actions are supposed to be tracked in the grievance database. Reports from the grievance database including resolution and feedback are supposed to be discussed intensively for six (6) months by the RAP Implementation Team. Discussions of the team revolve around the effectiveness of the GRM as well as

any common or recurrent issues that may indicate the need for structural changes in the project activities. Furthermore, GRM results may be reported back to the community as well as any changes made to the GRM process via village meetings.

Time is one of the key elements in GRM. For instance, Adjaristsqali Georgia LLC (AGL) Project requires thirty (30) days only to address grievances. The first fifteen (15) days are used for the complainant's grievances to be submitted to the GRM. The second fifteen (15) days are used by the GRC to decide on the case after reviewing the documentation from AGL and hear from both sides, the complainant and AGL and propose a solution (Georgia, 2014).

Furthermore, the Trung Son Hydropower Project in Vietnam (Noi, 2011) where the formal process of GRM was established within a framework of the WB-SP for Indigenous Peoples (World Bank, 2013a; Noi, 2011) and for Involuntary Resettlement (World Bank, 2013b; Noi, 2011) use only 120 days, as shown in Table 3 to conclude the grievance redress in four steps.

Also, GRM for the Gulpur Hydropower Project in Pakistan was established according to the requirements of the IFC-PS and ADB-SPS integrated with the local environment use only 30 days, as shown in Table 4 to conclude the grievance redress in four steps. Figure 2 shows the GRM for the SGR electrification in Tanzania that takes too long to conclude redressing of grievances.

From the 220 kV Transmission Line Project for the SGR Power Supply, a total of 2932 AP was interviewed of which 560 AP that is equivalent to 19.1% of all AP had complaints. Table 5 shows a summary of the AP with complaints that required GRM to address their complaints.

From APs' interview on grievances caused by the project, 99.6% of all grievances are classified in Category 1 of Grievances (Table 1) that are related with compensation. With this category, 94.3% of all grievances are concerned with less compensation compared to the actual value of the acquired properties. The remaining 0.4% of all grievances involve land degradation (excavations) caused by the Contractor, which is classified in Category 3 of Grievances. Figure 3 shows the types of grievances.

Furthermore, about 26% of the AP used the established GRM by writing a letter to the Project through Government Office at Village/Mtaa and Ward levels. About 67% of the AP who does not trust the established GRM in the project area did not use any method for addressing their complaints and grievances. Thus, they remained with their complaints and grievances contrary to the IFI requirements that need establishment of GRM to address all complaints from the project (ADB, 2010; ADB, 2009; World Bank, 2019; World Bank, 2013a; World Bank, 2013b). Also, about 6% of the AP who does not trust the established GRM decided to use other methods, such as writing complaint letters to the District and Regional Commissioners as well as the Permanent Secretary in the Ministry of Lands. About 1% of the AP used the Village Committee that was established by the Village Government to address project complaints and grievances. Figure 4 shows the methods used by AP to register complaints and grievances.

Table 3. The GRM process for the Trung Son hydropower project in Vietnam.

Steps	Grievance Redress Process (GRP) through Formal Process
1	If any person is aggrieved by any aspect of the resettlement program, the complainant can lodge an oral or written grievance with community authorities. The established Community People's Committee (CPC) will resolve the issue within fifteen (15) days from the date it receives the complaint.
2	If any aggrieved person is not satisfied with the decision of the CPC, that person can bring the complaint to the established District People's Committee (DPC) within fifteen (15) days from the date of the receipt of the first step decision. The DPC will reach a decision on the complaint within fifteen (15) days.
3	If the aggrieved person is still not satisfied with the decision of the DPC, that person can appeal to the Provincial People's Committee (PPC) within forty-five (45) days of receiving the decision of the DPC. The PPC will reach a decision on the complaint within the timing regulated by Vietnamese law.
4	If the Displaced Person (DP) is not satisfied with the decision of the PPC, the case may be submitted for consideration by the District Court (DD) within forty-five (45) days of receiving the decision of the PPC. The DD will reach a decision on the complaint within the timing regulated by the Vietnam's law. This is the Decree 84/2007/ND-CP on issues related with land acquisition, implementation of land use right, procedure for compensation, resettlement and grievance redress when land is acquired by the State.

Source: Noi (2011).

Table 4. The GRM process for the Trung Son hydropower project in Vietnam.

Steps	Grievance Redress Process (GRP) through Formal Process
1	GRC is established to consist members from the affected villages. These GRC members are elected by the APs to represent them in case of a complaint or dispute.
2	GRC use Focus Group Discussions (FGD) to find-out the wishes of the APs across all affected villages and the primary needs of the community to be addressed.
3	Monthly gathering of the GRC is facilitated by Mira Power Limited (MPL), the consultant, as part of the Corporate Social Responsibility (CSR).
4	CRC in turn communicate APs complaints or disputes and the community concern, needs and wishes to the MPL Office where they are dealt with in accordance to their nature.

Source: MPL (2017).

It was also discovered that 94.11% of the AP who used the established GRM did not receive feedback of their lodged concerns and grievances and there is no

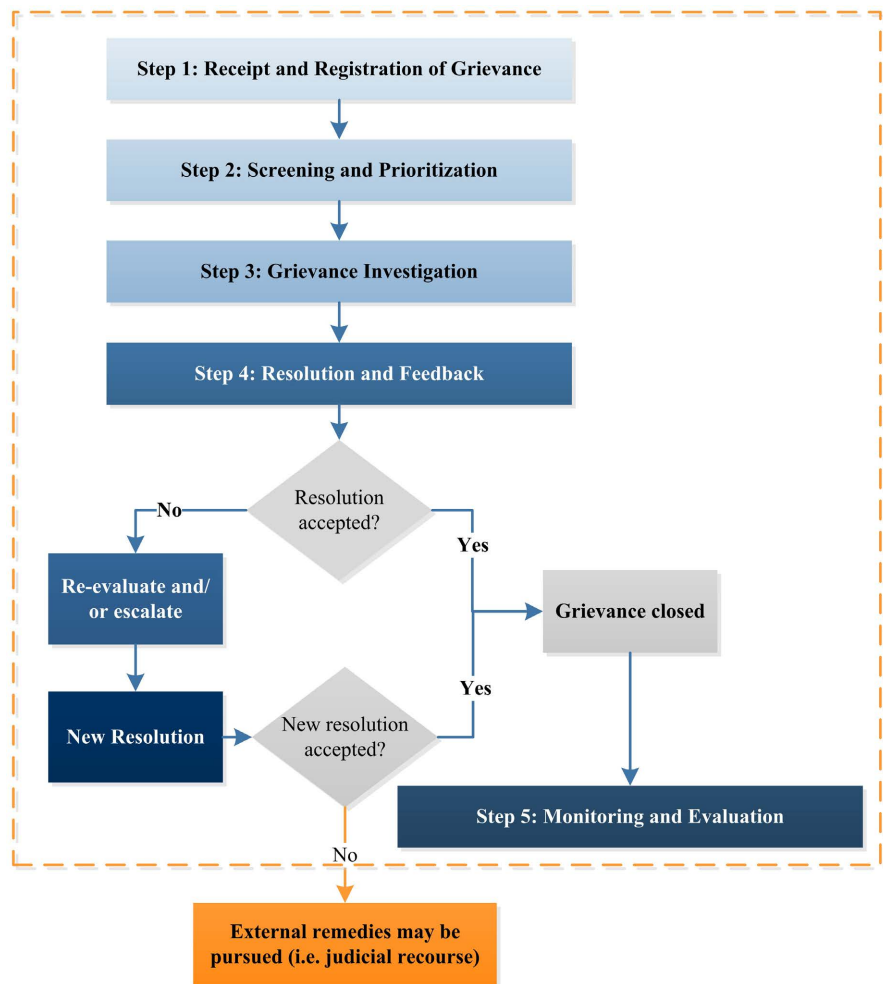


Figure 2. The GRM process for the SGR electrification project in Tanzania.

Table 5. A summary of affected persons with complaints from the project.

Response	Do you have complaints caused by the project?			
	Frequency	Percent	Valid Percent	Cumulative Percent
No	2372	80.9	80.9	80.9
Yes	560	19.1	19.1	100.0
Total	2932	100.0	100.0	

Source: Fieldwork.

communication. More than one year has elapsed since they registered their concerns and grievances. Step four of the GRM Process in the project area requires resolution and grievance feedback to be provided to complainants within fifteen (15) days of receipt of the initial grievance and the same should be resolved within six (6) months. IFI requirements need GRM to seek and resolve concerns and grievances promptly by using an understandable and transparent consultative process (ADB, 2010; ADB, 2009; World Bank, 2019; World Bank, 2013a; World Bank, 2013b). **Figure 5** shows the status of addressing grievances while **Table 6** shows a summary of the addressed complaints.

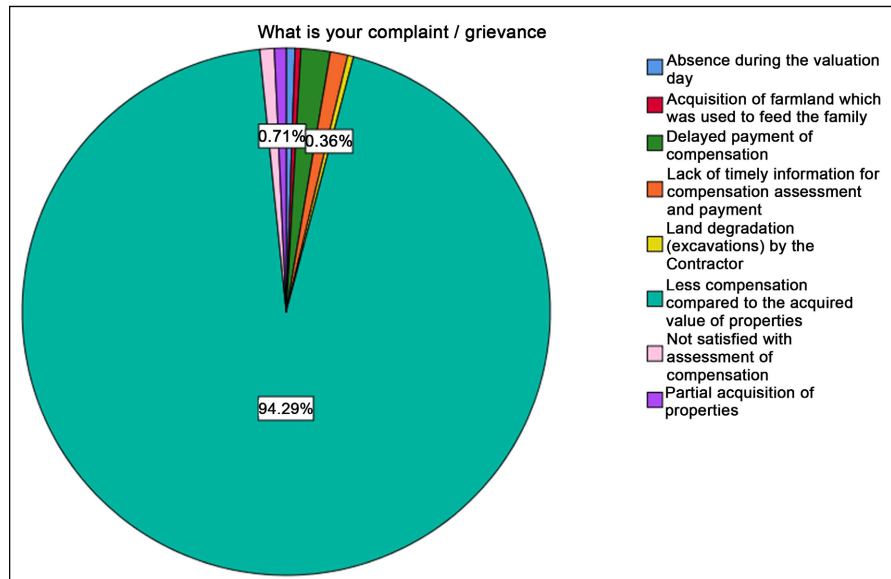


Figure 3. Types of complaints/grievances. Source: Fieldwork.

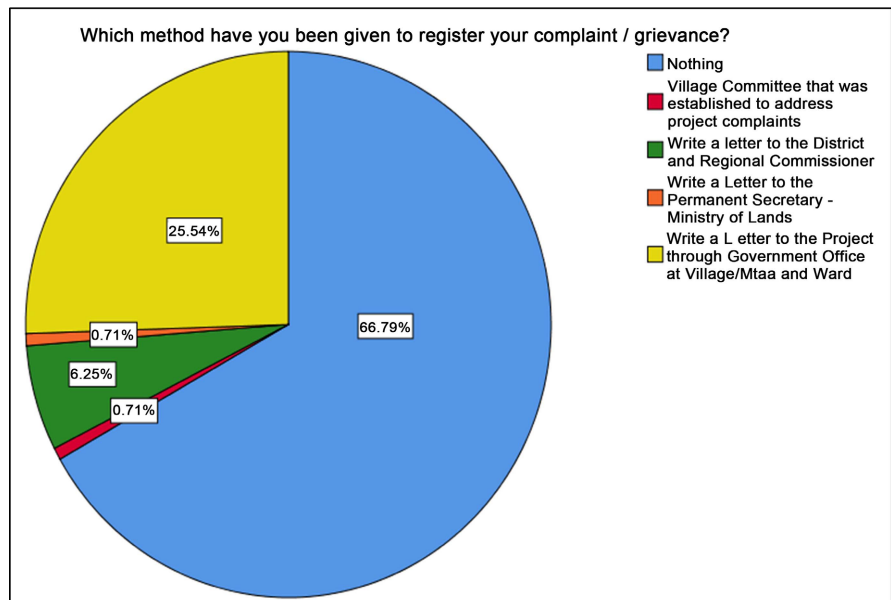


Figure 4. Methods used to register complaints and grievances. Source: Fieldwork.

Alternatively, there is a procedural method used in land acquisition and compensation for the AP to submit their grievances to the consultants who did the valuation for land acquisition and compensation that are addressed in time. This method is backed up by the existing national laws and regulations (URT, 2018; URT, 2009; URT, 1999; URT, 1969; URT, 1967). With this procedural method, complainants report to the Village/Mtaa Chairman where they receive introduction letters from the office. The letter introduces the complainant with his/her complains with evidence to support the claims. A passport size photograph of the complainant is attached to the letter and stamped by the Village/Mtaa Government Office. If an area with complains is surveyed, a letter from the

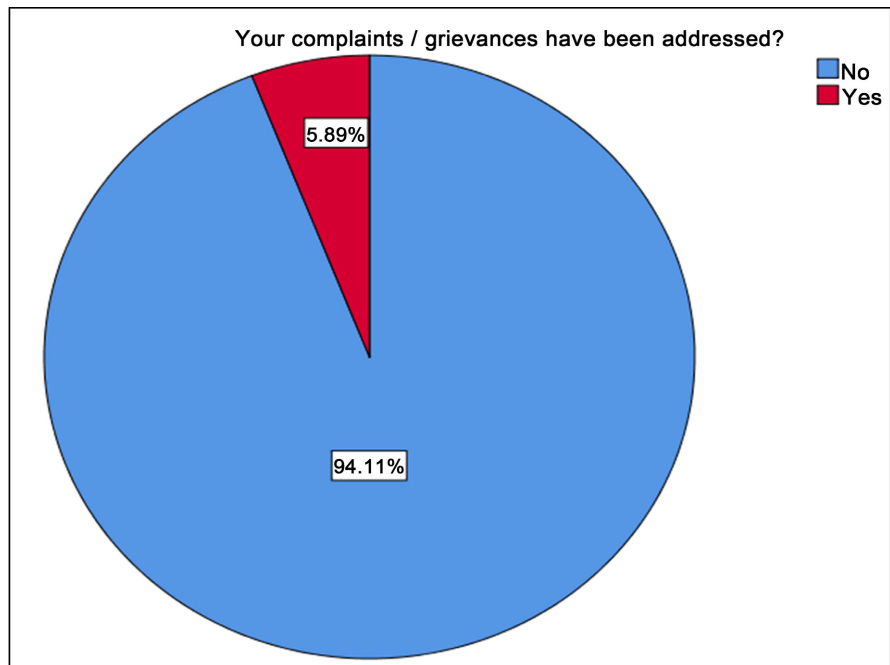


Figure 5. The status of addressing grievances by using the established GRM. Source: Fieldwork.

Table 6. Summary of the addressed complaints by using the established GRM.

Complaint/Grievance	Not Yet Addressed	Addressed	Total
Absence during the valuation day	3	0	3
Acquisition of farmland which was used to feed the family	2	0	2
Delayed payment of compensation	8	1	10
Lack of timely information for compensation assessment and payment	6	0	6
Land degradation (excavations) by the Contractor	1	1	2
Less compensation compared to the acquired value of properties	497	31	528
Not satisfied with assessment of compensation	5	0	5
Partial acquisition of properties	4	0	4
Total	527	33	560

Source: Fieldwork.

Town/Municipal/District Council has to be attached with a title deed. After the assessment, the consultant informs the complainants if the grievances are not valid, and/or instruct the client for further process if the grievances are valid.

Also, there are community and traditional methods used by pastoralists (Indigenous People) in the project area, mainly Maasai and Barbaig by using tradi-

tional leaders for communication and addressing of concerns and grievances according to customary laws, rules and procedures. In this case, a complainant submits a grievance verbally to the Chairman of Pastoralists or Laigwanan. Depending on sensitivity and magnitude of the grievance, if it cannot be addressed by the Chairman of Pastoralists or Laigwanan, such concerns and grievances are discussed in the Council of Elders. This traditional method is very effective in pastoralist communities and the complainants receive feedback and the issues are addressed on time. The use of traditional methods for addressing grievances is also supported by IFC (2012) that requires the use of community and traditional dispute settlement mechanisms available within the affected communities.

The use of alternative methods apart from GRM for addressing concerns and grievances is not unique in Tanzania, the same was used in other countries. For instance, the Adjaristsqali Hydropower Project in Georgia developed an informal process for addressing grievances (Georgia, 2014). Furthermore, Trung Son Hydropower Project in Vietnam also developed an informal process that was called an Independent Grievance Process for addressing grievances (Noi, 2011). The Government of India also prepared its own method of addressing grievances that is backed-up by legislations (Amit, Bhandari, & Kundu, 2014).

4. Conclusion and Recommendations

The prepared GRM according to the IFI requirements are not used as intended as about 74% of the AP does not use the established GRM. About 99% of the grievances are related with compensation of which 94% of the AP who used the established GRM to lodge their concerns and grievances did not receive feedback and there is no communication. Thus, the AP found alternative ways by using procedural methods used in land acquisition and compensation to submit their complaints to the consultants who did the valuation for land acquisition and compensation. Also, pastoralists (Indigenous People) used traditional methods through their traditional leaders for communication and addressing complaints and grievances according to their customary laws, rules and procedures.

It is therefore, recommended to improve the GRM Process so-as-to make it accessible by the AP. Improvement of the GRM can be achieved by integration of community and traditional dispute settlement mechanisms; integration of procedural methods of settling disputes used in land acquisition and compensation; representation of AP in the GRC/RAP implementation team; and reduction of time required for GRM process and feedback.

Integration of Community and Traditional Dispute Settlement Mechanisms

It is recommended at the early stages, GRM should be improved to include the community and traditional dispute settlement mechanisms that are mostly used in the affected communities to address complaints and grievances. Traditional and community leaders as well as village and Mtaa government leaders are involved. With this method, meetings to include the complainants are conducted of which communication and feedback is received instantly.

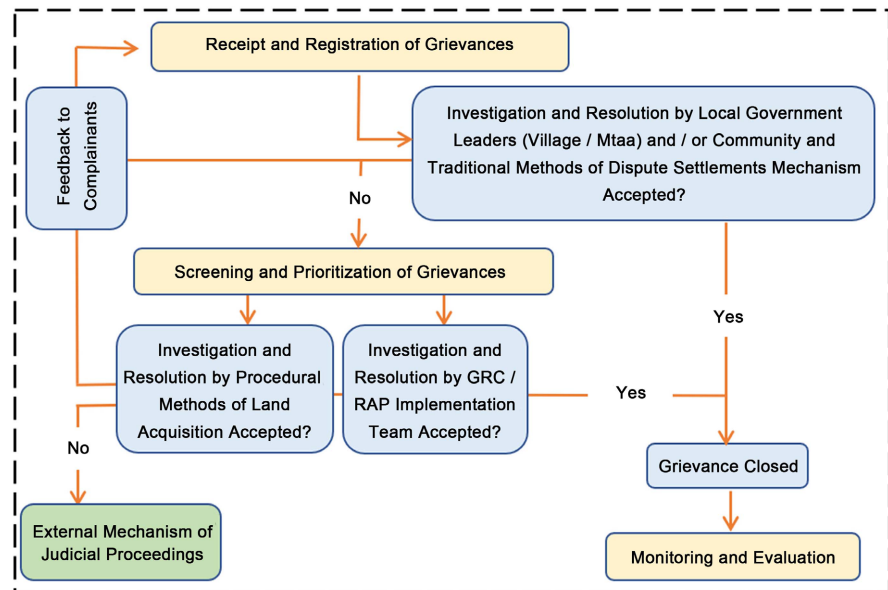


Figure 6. The proposed improvement of grievance redress mechanism.

Integration of Procedural Methods of Settling Disputes Used in Land Acquisition and Compensation

It is also recommended that GRM should be improved to include the procedural methods used in land acquisition and compensation that is backed up by the existing national laws and regulations. In this option, the AP submit their complaints through the Village/Mtaa Government Office to the consultants who did the valuation for land acquisition and compensation. This method is very effective and complaints are addressed and feedback received in time. With this method, stakeholder engagements and disclosure can also be used as platforms for the affected communities and individuals to receive relevant information on any risk to and potential impacts on such communities and individuals. The same is also recommended for receiving feedback (periodic reporting) and relevant mitigation measures of the raised grievances, risks and impacts.

Improve Representation of AP in the GRC/RAP Implementation Team

The AP should be represented in the GRC/RAP Implementation Team. As the case of Georgia, the recommended members are 1) three representatives from the Project, firstly a person who is familiar with land acquisition and compensation, secondly, the environmental expert, and thirdly, CLO; 2) representative of the local government authority by a person who is familiar with land acquisition and compensation, environmental management, agriculture or other relevant section; 3) village/Mtaa leader; and 4) three representatives of the community who are not directly affected by the grievance in question.

Reduction of Time Required for GRM Process and Feedback

It is recommended that time for receiving grievances, resolution and feedback should be shortened. As the case of Adjaristsqali Georgia LLC (AGL) Project in Georgia, it requires only thirty (30) days to receive and address grievances. **Fig-**

ure 6 shows a summary of the proposed improvement of GRM that has taken onboard the proposed recommendations.

Conflicts of Interest

The authors declare no conflicts of interest regarding the publication of this paper.

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