

Consultation Phase



PROMABEN

Assessment and Consultation Report BR MICI002/2010

May, 2011



Assessment and Consultation Phase Report

May, 2001

Executive Summary

Project: Estrada Nova Watershed Sanitation Program, PROMABEN (BR-L1065 - 1998/OC-BR)

Location: Belém, Estado de Pará, Brazil

Operational Policies involved: Disclosure of Information Policy (OP-102) and Involuntary Resettlement Operational Policy (OP-710).

Assessment and Consultation Team: Isabel Lavadenz (Ombudsperson) and Ana Núñez (Research Fellow)

Eligibility Phase: The Ombudsperson considered the Request eligible on December 17th, 2010 pursuant the Eligibility and Exclusion criteria included in the Policy Establishing the Independent Consultation and Investigation Mechanism's (ICIM).

Assessment Phase: The ICIM team led an assessment based on a desk review, interviews with the Project team, audio-conferences with the Requester, and a field visit to Belem, Estado de Pará (Brazil) on February 6th-11th, 2011. The ICIM team's findings and facilitation efforts enabled a Solution-Seeking Dialogue Table on the spot, reaching an agreement at the end of the field visit.

Assessment Findings: The Requester and the Project Coordination Unit (UCP by its Portuguese acronym) needed to exchange key information aimed at facilitating the finding of common grounds for reaching a final agreement. The UCP had encountered a number of difficulties in identifying and communicating with the right holder of the property. The Requester and his father needed to provide baseline documentation to the UCP, adhere to the PROMABEN resettlement program, and complete a mandatory socio-economic cadastre. The UCP needed to provide further information to the Requester regarding the overall resettlement program, as well as the compensation valuation methodology.

Additionally, the ICIM found neighbors and other Project affected people being overall in favor of the Project but voicing concerns on the resettlement process. The concerns gravitated around receiving incomplete Project information and unrealistic replacement values which, according to the people interviewed, are insufficient to restore socioeconomic conditions (i.e. purchasing a similar home in a comparable area of the city).

Consultation Phase: The ICIM team facilitated a Solution-Seeking Dialogue Table between the Requester and his father (the right holder of the property), and the UCP's social and legal teams. The main agreements reached were: (i) the UCP provided further information to the Requester on the overall resettlement program as well as the compensation valuation methodology; (ii) the Requester's father adhered to the PROMABEN resettlement program and completed a mandatory socio-economic cadastre; (iii) the UCP needed to respond to the Requester's observations regarding the possible additional value of two specific house improvements on the final compensation amount; (iv) the Requester and his father accepted in principle the compensation; (v) the UCP was asked to withdraw the Requester's case from a compulsory purchase process with the Municipal Judicial Office (SEMAJ by its Portuguese Acronym); and (vi) the Requester needed to provide relevant legal documentation to contest or confirm a last minute plea introduced by his former domestic partner over the same property.

Consultation Conclusions: The Parties were very collaborative and worked towards a solution reaching an agreement at the end of the Solution-Seeking Dialogue Table on the following issues: access to information from both sides, adherence to PROMABEN's resettlement program, disclosure of the property valuation methodology, and the acceptance of the compensation in principle. The **Consultation Phase concluded** before the formal transfer of rights agreement between the right holder of the property and the UCP could be signed¹ due to a change of circumstances. As informed during the Solution-Seeking Dialogue Table, the Requester's former domestic partner opened a parallel compensation claim over the same property. The ICIM is unable to further facilitate said agreement since the issue of a third party legal petition is considered outside the scope of the ICIM's Consultation Process.

ICIM's role and next steps: In terms of the Request, the ICIM team was instrumental in facilitating key agreements and defining next steps between the Requester and the UCP. The ICIM monitored the compliance of the agreements reached, and officially **closed the case on May 6th, 2011**.

In terms of enhancing the quality of PROMABEN's response to actual or future complaints, the ICIM and the Environmental and Safeguards Group (ESG) suggested and provided technical inputs for the creation of a Project level Local Grievance Mechanism (LGM). PROMABEN's LGM will constitute for the beneficiaries a first instance and a one-stop-shop for submitting their questions, petitions and complaints and receiving a reasoned, consistent and timely response. The ICIM's next steps will focus on working upstream with the Project team, and providing further technical assistance to the LGM when required.

¹ As part of the resettlement program, the UCP and property right holders sign a standard acceptance and tenure rights transfer agreement.

Table of Content

1. Background	5
1.1. The Request	5
1.2. The Project	5
2. Assessment Process	8
2.1. Field visit	8
2.2. Assessment findings.....	8
3. Consultation Phase Exercise	9
3.1. Summary of the Solution-Seeking Dialogue Table exercise	9
3.2. Status of the Request.....	10
4. Next Steps	11
5. Lessons Learned	11
Annex 1: Recommendations for the design of a Local Grievance Mechanism	13
Annex 2: Images.....	16

1. Background

1.1. The Request

Mr. Jose Nildo Trinidad da Costa (the Requester) submitted a claim to the Independent Consultation and Investigation Mechanism (ICIM) on October 4th, 2010 on the basis of being adversely, directly and substantially affected by a break on Inter-American Development Bank's Disclosure of Information Policy (OP-102) and Involuntary Resettlement Policy (OP-710) by the PROMABEN Project (1998/OC-BR). In particular, the Requester claimed that: (i) communication with Project beneficiaries has been arbitrary, unstructured and unclear; (ii) the methodology for valuation was not known to him, and (iii) the market value of his property was substantially higher than the compensation offered by PROMABEN (i.e. the compensation offered by PROMABEN as part of the resettlement plan is insufficient to restore his and his family socioeconomic conditions). The Request was considered eligible by the Ombudsperson on December 17th, 2010.

1.2. The Project

PROMABEN's development objective is supporting the Belem Municipality in improving the environmental and social conditions of the Estrada Nueva urban basin. The specific objectives include: "... (ii) improve[ing] housing conditions among the population living in the area, through urban planning, efforts to regularize land tenure, adoption of suitable housing solutions, and the establishment of recreational areas." The loan amount is US\$68,750,000 with the same amount co-financed by the Belem Municipality. The Inter-American Development Bank (IDB) Board of Executive Directors approved the loan on July 9, 2008. PROMABEN has experienced delays in Project implementation due to a number of challenges including complaints by Project-affected people over the Project's original infrastructural design and issues with the implementation of the Resettlement Plan. The IDB Project team is in the process of extending the closing date and reallocating the remaining budget.

The area around the Project presents numerous informal settlements, often built on the canals. The area has adequate water supply coverage but lacks sanitation and waste management services. The combination of sewage and waste drained to the canals, some of them stagnant, could potentially constitute a health hazard and an environmental liability for the population in the area. In addition, the Project area is naturally prone to floods being crossed by numerous small springs (*igarapés*) which are regularly flooded by Guama River dramatic tides. The flood risk is exacerbated by the increased number informal settlements and lack of adequate infrastructure to manage and control de floods.

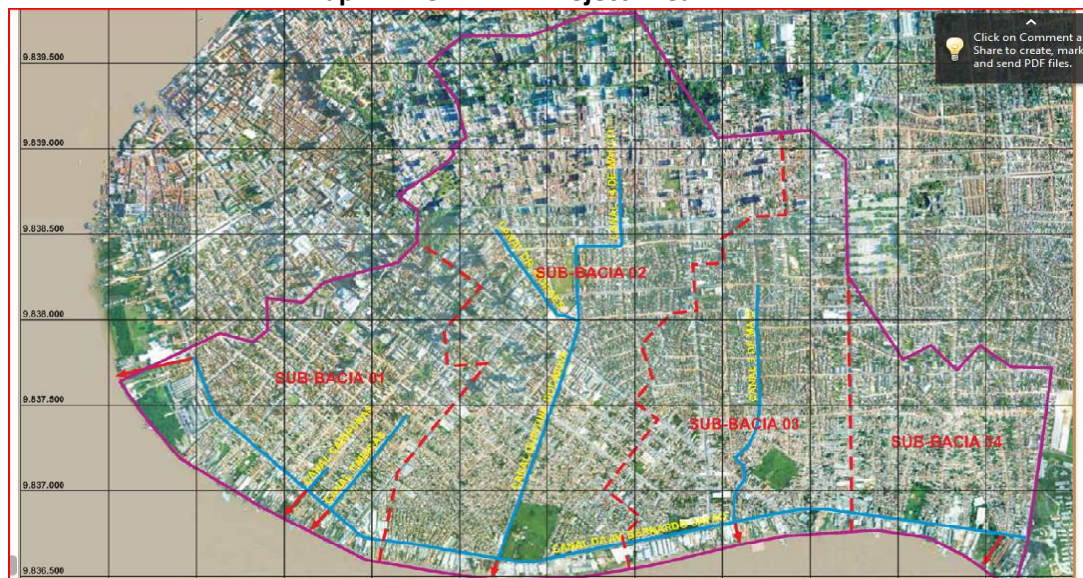
Image 1: House built on the canal affected by flooding



Picture provided by PROMABEN's Project Team

The Project will finance infrastructural developments such as hydraulic, sanitation and road networks. The Project's overall implementation is divided by four sub-basins or *sub-bacias* (see Map 1 below). Each *sub-bacia* is subsequently divided in smaller areas or *trechos* (see Map 2 below). Sub-bacia 1, trecho 1 is currently being implemented on the ground.

Map 1. PROMABEN Project Area

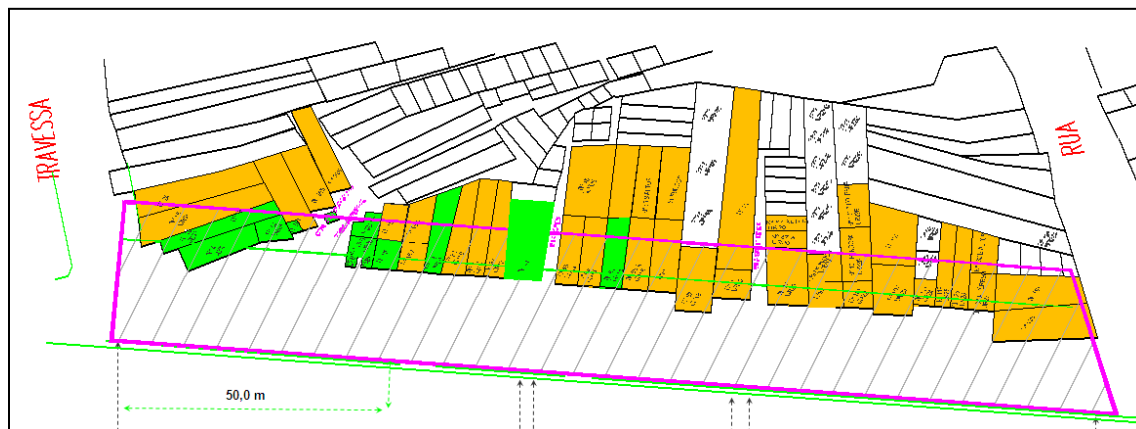


Picture provided by PROMABEN's Project Team

Component 1 of the Project, *Urban Drainage Improvement* supports 2.3km of canal rehabilitation as well as 15ha of linear parks construction alongside the rehabilitated canals. In this context, PROMABEN Component 1 includes a Resettlement Plan for approximately 1,100 families and 150 business directly affected by the canal rehabilitation. An Involuntary Resettlement Plan (*Plano Diretor de Reassentamento de População e Atividades Econômicas*) includes delivering basic urban services to population living in the Project area, efforts to regularize land tenure in the adjacent areas to the rehabilitated canals, and issuing property rights to resettled families and businesses.

Consultations and community concerns during Project design and early implementation, allowed for two significant changes on the original Project's infrastructure development plan, namely: (i) removing the construction of an accumulation basin, and (ii) modifying the Canal de Caripunas from and open to a closed canal. The two timely measures brought down considerably the social pressure and justify related costs and delays. While these seem to have been decided to minimize resettlement issues, impact on hydraulic infrastructure may require to be further discussed.

Map 2. PROMABEN Trecho 1 (detail)



As mentioned above, PROMABEN is currently implementing Sub-bacia 1, trecho 1. Map 2 shows the original Project area (shaded area) and affected buildings. As shown in Map 2, some buildings are only partially affected. Initially, it was anticipated to fully demolish all buildings overlapping totally or partially with the original Project area. PROMABEN expected to build a commercial area aimed at resettling business owned by beneficiaries in the remaining demolished area beyond the Project's original area. However, home owners are showing a strong interest in remaining in the area adjacent to the original Project area and thus, having their homes only partially demolished or rebuilt in the remaining area of their property. In order to avoid relocation whenever possible, the Project team will revise the Resettlement Plan to take these concerns into consideration when deciding on both, the commercial area's overall design and its location.

2. Assessment Process

2.1. Field visit

On February 6th-11th, 2011 an ICIM team joined a PROMABEN Implementation Review Mission. The objectives of the Implementation Review included: (i) assessing the current status of the resettlement process, particularly with respect to the compensation plan; (ii) checking the quality and time availability of appropriate housing options; (iii) monitoring the progress on implementation of socio-environmental measures and the degree of compliance with environmental and social safeguards of the IADB; (iv) supporting the Project team in identifying measures to improve the Project team's capacity to coordinate and manage environmental and social aspects of the Project, especially in the resettlement area; (v) participating in the ICIM assessment process.

The ICIM and the Project team had working meetings with representatives of the Belem Municipality, different teams within the UCP, contractors, Project affected people, neighbors and the Requester. Among the overall findings of the Field are:

- Parties were very collaborative and worked towards a solution
- The assessment allowed for a Solution-Seeking Dialogue Table on the spot
- The Consultation Phase concluded due to a change of circumstances (i.e. a parallel compensation claim on the same property by Requester's former domestic partner). The ICIM cannot intervene on the issue of a third party's legal petition which is considered outside the scope of the ICIM's Consultation Process
- It was not necessary to interview other authorities at this time
- The ICIM team identified a number of additional procedural, methodological and technical issues that could potentially be subject of and generate new complaints. In order to prevent, address and respond to possible project affected people's concerns, the ICIM team recommended establishing a project level Local Grievance Mechanism (LGM) to address requests inherent to this complex Project on the ground
- The ICIM team provided technical inputs for the creation of the LGM during the field visit. In addition, a typology of issues and situations was elaborated jointly with UCP's personnel. The Project team is developing an Action Plan which envisages a capacity building effort aimed at supporting the early establishment and implementation of the LGM.

2.2. Assessment findings

The Project is located on federally owned land adjacent to the Guama River or *Tierra de Marina*. Hence, there is limited access to individual property rights except through a donation made by the National Government (*the Union*). Donations confer two different types of domains² over the land: (i) *Dominio pleno* granted to the Belém Municipality or *Companhia de Desenvolvimento e Administração da Área Metropolitana de Belém* (CODEM); and (ii) *Domínio Útil*, granted to the inhabitants by Belem's Prefeitura Municipal or by CODEM through a special contract, the *Uso especial para fins de moradia*³

² Domain over a good can be considered *directo*, typical of the owner; and *útil*, typical of the person who uses the good in exchange of a fee. The holder of a *útil* domain can use and profit from the good as long as (s)he pays the fee. Failure to pay the fee could potentially lead to the seizure of the domain by the *directo* user.

³ The *Uso especial para fins de moradia* grants the right to use a property indefinitely and, for PROMABEN project area, foresees a possible future expropriation and an in-kind house compensation.

contract granted to inhabitants in the Project area includes a possible property expropriation due to an “urban project executed by the *Prefeitura de Belém*” (i.e. PROMABEN) and stipulates an in-kind housing replacement as compensation.

Compensations are calculated taking into consideration tenure rights, property square footage, and home improvements vis-à-vis pre-determined values established by the Associação Brasileira de Normas Técnicas (ABNT). The UCP considers two main types of tenure rights when calculating compensations: (i) owner, who was granted with the original *Uso especial para fins de moradia*, or was part of lawful subsequent transfers; and (ii) inhabitant who has no property rights over the land. This narrow typology of tenure rights and subsequent compensation options could potentially limit the full recognition of project beneficiaries’ assets and could represent a gap with IDB’s Operational Policy 710 for Involuntary Resettlement. Indeed, OP-710 recognizes that “...the majority of people affected by development projects belongs to the poorest sectors of the community and often has no title to the land or premises they occupy. In such cases, the resettlement plan must provide a restoration package that [...] maintains the livelihood of the affected people.”

In addition, the Project has legal limitations in the national legislation to compensate affected people beyond values calculated through said methodology. In order to address possible gaps with OP-710 the UCP could include the concept of rehabilitation in order to provide “extra-legal remedies for the losses suffered by the resettled population without requiring major changes in local legislation.”⁴

Finally, the UCP has and is experiencing difficulties in undertaking a proper review of settlers’ legal situation due mostly to incomplete property rights records. The UCP estimates that the majority of project beneficiaries have no formal legal right to the land.

The Action Plan, being developed by the Project team, aims at addressing these issues in accordance with the recommendations of the mission report.

3. Consultation Phase Exercise

3.1. Summary of the Solution-Seeking Dialogue Table exercise

On February 10th, concurrently with the ICIM’s Assessment, the Project Ombudsperson facilitated a Solution-Seeking Dialogue Table between the Requester, his father, and UCP’s social and legal teams. During the session the Requester and the UCP reached the following agreements:

- The Requester and his father presented relevant documentation⁵ aimed at stating the father’s stake on the Property; completed the mandatory socioeconomic *cadastre*; and adhered to PROMABEN’s resettlement program.
- The UCP provided further information to the Requester on the overall resettlement process as well as the compensation valuation methodology applied to the property; agreed to review the Requester’s property valuation in light of two house improvements stated in the socio-economic

⁴ Inter American Development Bank (1998), Involuntary Resettlement Operational Policy (OP-710), p. 31.

⁵ That is *Minuta da Compra-Venda*, *Carta de Procuração* from Mr. Trinidad’s father, *Cédula de identidade*.

cadastre and provide a timely and justified response to the requester; and agreed to withdraw the Requester's case from a compulsory purchase process with the SEMAJ.

The main findings from the Solution-Seeking Dialogue Table included:

- The UCP's legal unit informed the Requester and his father about a parallel compensation claim before the UCP on the same property presented by the Requester's former domestic partner, together with supporting documentation which indicated that presumably the Requester's father transferred the property to his son, and allowed his son, together with his partner, to invest on substantial house improvements. As a result, the Requester agreed to provide relevant legal documentation to contest or confirm such plea.
- The ICIM cannot further mediate in this matter between third parties, the Requester and the UCP.

3.2. Status of the Request

The ICIM was instrumental in facilitating key agreements and defining next steps between the Requester and the UCP. The ICIM monitored the implementation of the agreements reached during the Solution-Seeking Dialogue Table, namely: (i) the UCP needed to provide to the Requester a timely and justified property valuation review and to withdraw the Requester's case from a compulsory purchase process with the Municipal Judicial Office; and (ii) the Requester needed to provide relevant legal documentation to contest or confirm a plea introduced by his former partner, claiming 50 percent of the compensation amount.

On February 16th, the UCP issued a property valuation review in light of the two house improvements stated in the cadastre completed by the Requester and his father. The UCP considered that said improvements did not merit a modification of the final compensation value. In addition, the UCP withdrew from the compulsory purchase process in the Municipal Judicial Office. On February 22nd, the Municipal Judicial Office officially sent the process back to the UCP.

Between February and March, the UCP received enough information to confirm the Requester's former partner's lawful claim to the property.⁶ The Requester and his former domestic partner adhered separately to PROMABEN's resettlement program on March 21st and 24th, respectively. The UCP signed two agreements with the Requester and his former domestic partner on March 24th and 28th, respectively. By virtue of said agreements, the Requester and his former domestic partner transferred their tenure rights and accepted each of them, half of the total compensation. The UCP has pursued the appropriate procedural actions (i.e. written request to the Secretaria Municipal do Urbanismo) to proceed with the payment.

⁶ Including a Family Court order, dated March 15th 2011, to the UCP to make the full compensation available to the Requester and his former partner available through the Family Court.

4. Next Steps

Since the issues of the complaint were addressed, agreed and complied with by the parties in March 2011, the ICIM's next steps will exclusively focus on working upstream together with the Environmental and Safeguards Group (ESG) to support the design and implementation of the LGM if and when required. The PROMABEN Action Plan, being developed by ESG and the Project Team, envisages a capacity development exercise in this fiscal year, aimed at providing the LGM with adequate tools and good practices for addressing community's questions, concerns and complaints at the project level.

5. Lessons Learned ⁷

The development of projects involving involuntary resettlement is complex in nature and requires intense preparation and flexible implementation in order to avoid, minimize, manage, and properly compensate for negative impacts on displaced populations. The ICIM observed that in the case of PROMABEN, project beneficiaries were overall in favor of the Project and understood its potential positive impacts on improving the quality of life in the area. However, project affected people voiced concerns about the resettlement process, especially around receiving incomplete Project information, unrealistic replacement values and being unnecessarily excluded from the Project's benefits. According to interviewed community members, replacement values are insufficient to restore their socioeconomic conditions (i.e. purchasing a similar home in a comparable area of the city), and in a number of cases, full resettlement could and should be avoided.

The ICIM and ESG identified a number of key aspects, mainly in the implementation of the Resettlement Plan that could be instrumental in improving development impacts of similar projects as well as the further implementation of PROMABEN. Key aspects and main alternative actions were discussed and are summarized below:

- **Preliminary assessment of the legal framework vis-à-vis IDB's Operational Policies**
Additional gap analysis of the local legal framework focused on the applicable legislation for expropriation, compensation and rehabilitation vis-à-vis Involuntary Resettlement Operational Policy (OP-710), could be instrumental for identifying and recommending compensation measures aimed at restoring the livelihoods of project affected people and avoid further impoverishment. As included in the Involuntary Resettlement Operational Policy (OP-710), "...the resettlement plan must identify the legal and institutional context within which the compensation and rehabilitation measure have to be implemented [...] [allowing] to work within the constraints of local laws and institutions, complementing them only as required with project specific measures."
- **Analysis of project affected people, potential impacts and resettlement options**

Having a complementary socioeconomic and legal assessment of the Project affected area prior to designing each *Plano Diretor da Relocalização de População e Atividades Econômicas* (PDR) would be instrumental in:

⁷ The Policy establishing the Independent Consultation and Investigation Mechanism indicates in Art. 76. c that the duties of the Project Ombudsperson shall include "...providing advice to operational units in their problem-solving activities..."

- Developing a typology of typical situations faced by displaced people and possible compensation measures
 - Identifying vulnerable population for whom special provisions have to be made
 - Having grounds to confirm or contest inhabitants' self declaration regarding land property
- Resettlement should, to the extent that is feasible, be avoided, mitigated and then compensated. Resettlement plans should consider alternatives to minimize resettlement for inhabitants whose properties are only partially affected by the Project's footprint, and this decision should be based on technical and equitable criteria.
- In order to fully reflect the reality of Project affected people's tenure rights, property screening should include intermediate rights such as a purchase agreement from a non-owner or a long time occupation.
- **Communication and transparency issues**
 - It would be beneficial to fully implement a communication strategy tailored to different project affected people that includes various aspects of the Resettlement Plan including:
 - Project affected areas, details of the proposed solution and actors involved
 - Resettlement specifics and assistance
 - Disclosure of compensation valuation methodology
- **Resettlement implementation issues**
 - When considering rehabilitation options, some instruments –already included in the PDR- such as the *Permuta* could be instrumental in maintaining project affected people's livelihood and should be implemented fully as provided in PROMABEN's PDR.
 - As the preparation of PER proceeds under the PDR, these more specific plans should include innovative ways to facilitate project affected people access to private market housing, such as pre-identified similar properties, or working stations with access to housing market information.
 - When implementing demolition works, a proper rehabilitation of remaining properties and separation and disposal of debris should be implemented in parallel – avoiding unnecessary health hazards caused by partial demolitions and possible remaining debris.

Image 2: Example of demolition debris not properly disposed



Annex 1: Recommendations for the design of a Local Grievance Mechanism

The ICIM and the ESG suggested establishing a Project level local grievance mechanism (LGM) aimed at addressing questions, petitions and complaints from PROMABEN project affected people. The LGM would represent to complainants a first instance one-stop-shop for receiving reasoned, consistent and timely response to their concerns. The LGM would not replace but strengthen current efforts by PROMABEN's social, environmental, and legal teams and the Participatory Management Desk *Escritório de Gestão Participativa* (EGP).

The Belém Municipality agreed to strengthen the ESP with a LGM. The ICIM provided technical inputs for the creation of the LGM during the mission. Moreover, the ESG is leading the design of an action plan to move PROMABEN forward. Particularly related to the LGM, the action plan foresees a joint ESG/MICI capacity building effort aimed at supporting the early establishment and implementation of the LGM in this fiscal year.

The basic features defining institutional mapping, procedures and functions of the LGM should be consistent with good business practices in Brazil, as well as in countries where such programs have been successfully instrumented.

The mission and the local team worked on some of the key features of the LGM. The key features are summarized below:

- Independence
 - Does not rely on others in the process of solution-seeking
 - Has freedom of action within the framework of the Brazilian law and functions separately from UCP
 - Reports to an institution outside the Project such as the *Prefeitura*
- Impartiality
 - Has no particular interest
 - Is objective
 - Its only interest is to minimize the risk of conflict and facilitate a solution-seeking process
- Efficiency
 - Is agile in responding
 - Is one-stop shop for Project-affected people, and coordinates with different project teams
 - Is Proactive
 - Seeks to generate the least possible cost to the public
 - Articulates and coordinates with all stakeholders to avoid delays and duplication
 - Promotes timely communication

- Possesses the necessary tools to accomplish the work efficiently and independently (UCP needs to provide the required information, institutional support, financial sustainability, technical capacity, etc.)

Typology of situations and conflicts

The ICIM recommended establishing a typology of situation faced by displaced people and a description of the resettlement options available based on the lessons learned in the implementation so far. The typology and resettlement options will help to easily identify the situation and possible solutions available to displaced people, as well as the social, technical or legal limitations of the implementing agencies. The typology and resettlement options would be instrumental for both LGM and EGP to avoid minimize and ultimately deal with complaints and potential conflicts. The ICIM proposed a framework exercise featuring an array of first level situations and possible options. Second and third level variations are numerous and therefore partially known.

The following is a table with some examples

STATUS	CHANGE FROM 1ST LEVEL	COMPLAINT	AVAILABLE ALTERNATIVES	REFERENCES	RESTRICTIONS
Resident who has no property rights	Lives in the house	Disagrees with the appraisal	Indemnification via the courts	PER, PDR, Law...	Only improvements according to law can be acknowledged
Resident with acquired right	Does not live in the house and has no tenant	Disagrees with the appraisal	Exchange?	PDR, etc.	Land and improvements can be indemnified
Resident wants to remain in the unaffected extension	Building is habitable or one can be constructed - Not yet habitable	Does not accept relocation	Consolidate continued occupancy? - Indemnification via the courts	Decree, PDR?	Indemnify only the affected portion and consolidate ownership of the rest?
Building value is low	With land - Without land	Value insufficient to restore standard of living	Review the value of the basic module Apply a rate to update the value Bonus for rehabilitation?	IDB policy, PDR, etc.	Legal framework and budget
Ownership in dispute	In family court Lack of standing	More than one person claims indemnification	Indemnification via the courts	Law....etc.	Brazilian law
Termination of assistance	Business Dwelling	Loss of earnings Loss of quality of life and financial loss	Change the option (ex. from indemnification to exchange Reinstitute assistance Bonus for loss of earnings?	PDR, PER, etc.	PROMABEN procedures and budget
Rejects the housing solution offered	Will not accept a unit in multifamily dwelling. Accepts only single-family house	Refuses to continue with housing assistance and seeks exchange of house for house	?	?	?

Procedures, composition and functions

For the LGM to operate effectively and generate credibility among users, it is important to emphasize the nature of extra-legal actions. The principle of operating efficiency is key. The LGM should: (i) follow flexible procedures, tailored to the particular case; (ii) be accessible to enable people who face a difficult situation not properly addressed or resolved satisfactorily by the UCP in any of its instances, to be heard without ceremony or requirements, and informed in a manner that allows everyone to understand and interpret and that does not give room for manipulation. In performing its functions, the LGM will rely on existing organizations and associations in the Project area, such as the Family Commissions.

Ideally the LGM should consist of personnel versed in conflict resolution in development projects (with elements such as resettlement, environmental health, etc.), as well as the socio-cultural context of the Project area. The LGM should be able to serve as a nexus between the different teams of UCP (legal, environmental, social, and engineering), contractors executing the work in the field, and Project beneficiaries. The LGM should represent for the beneficiaries a one-stop-shop at project level to submit their petitions and complaints and receive a reasoned and justified response in a timely manner.

The functions of the LGM staff are fundamentally facilitation, coordination and articulation. The LGM could also monitor compliance with the agreements reached. The LGM works with the UPC, but its main interest is not focused on administration, but on contributing to the better understanding and acceptance of the work and its results. The LGM has an obligation to report on the completion of performance targets set by the project. To perform its functions, the LGM can make alliances with academic institutions, NGOs or other technical actors.

Annex 2: Images



