



ANNEX NO.7

# **THE MOLDOVA ROAD PROJECT V**

(DTM 45094)

## **THE TECHNICAL DESIGN STAGE**

### **THE DRAFT REPORT**

**The Project's specific Complaint Mechanism (PCM)  
for reconstruction of the express road M1**

**Lot no.2 (km 9+208 – km 38+800)**

### **REQUIREMENTS**

|                                                                                                                                                      |                                                                                                                                                                                                                                                                                          |                                                                                                                                          |
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|  <p>Ministry of<br/>Infrastructure and<br/>Regional Development</p> | <p align="center"><b>THE MOLDOVA ROAD PROJECT V</b></p> <p align="center"><b>The Project's specific Complaint Mechanism for<br/>reconstruction of the express road M1<br/>Lot no.2 (km 9+208 – km 38+800)</b></p> <p align="center"><b>THE TECHNICAL DESIGN STAGE – REQUIREMENTS</b></p> |  <p>S.A. ADMINISTRATIA<br/>NATIONALA A DRUMURILOR</p> |
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## 1 SCOPE

The Employer NRA has established the Project's Complaint Mechanism in accordance with the EBRD's Performance Requirement No. 10: Information Disclosure and Stakeholder Engagement. This mechanism is designed to manage complaints received from affected communities, individuals and other interested parties regarding construction site activities. The Project's Complaint Mechanism is intended to identify, examine and resolve complaints from affected communities and individuals regarding construction works carried out by the General Contractor on the construction site. This procedure may be updated at the proposal of the relevant parties to improve the functioning of the Project's Complaint Mechanism.

The Project's Complaint Mechanism is a formal process that allows individuals and representatives of public and private institutions and local citizen groups who consider themselves to be affected by the Project's planned activities (including construction and operational works, etc.) to file complaints and raise concerns about situations that could affect their interests and rights. The Mechanism also enables them to ask questions and make suggestions regarding the Project's implementation.

## 2 NORMATIVE REFERENCES

The following documents shall be applied for implementation of this document in the Hincesti and Nisporeni Districts (Lot no.2):

- The Project's Environmental and Social Management System
- The Project's specific ESMP for rehabilitation process of the express way M1 Lot no.1
- The Project's specific Labour Management Procedure
- The project's specific Code of Conduct
- The project's specific Consultation and Participation Procedure
- The Project's ESAP
- Applicable EBRD's PR no.1 and PR no.2, PR no.3, PR no.4, PR no.8, PR no.10
- The Environmental Permit no.24 of August 2025 issued by the Environmental Agency
- The Urbanism Certificate for Design no.1/2024 issued by the Hincesti District
- The Planning Town Urbanism Certificate<sup>1</sup> for Design no. 1 of August 13<sup>th</sup> 2024 issued by the Nisporeni District Council

## 3.0 TERMS, DEFINITIONS AND ACRONYMS

### 3.1 Terms and definitions

The terms used hereinafter have the same meaning attributed to them in normative references. For a better understanding of the present document and training of personnel, the following terms and definitions set forth in the above-mentioned standards are rendered to be more valuable:

<sup>1</sup> Source: <https://hincesti.md/category/subdiviziunile/sectia-constructii-gospodarie-comunala-si-drumuri/>

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**Audit:** is a systematic, independent and documented process to obtain Evidences of Audit and assess them objectively in order to determine the extent to which the audit criteria are complied with.

**Community workers:** people employed or engaged in providing community labor.

**Complainant:** The individual(s) or Organisation(s), as the case may be, submitting a Complaint to the PCM.

**Complaint:** The written request submitted by a Complainant to the PCM pursuant to these rules of procedures.

**Continuous Improvement:** repeated activity to increase the ability to comply with requirements.

**Corrective Action:** action taken to eliminate the cause of a Non-conformity detected or any other unwanted situation.

**Direct workers:** people employed or engaged directly by the Contractor to work specifically in relation to the project.

**Discrimination in employment:** is defined as any distinction, exclusion, or preference with respect to recruitment, hiring, firing, working conditions, or terms of employment made on the basis of personal characteristics unrelated to inherent job requirements that nullifies or impairs equality of opportunity or treatment in employment or occupation.

**Document:** information and its supporting medium. The medium can be paper, magnetic, electronic or optical computer disc, photograph or master sample, or a combination thereof.

**Exploitation of persons** – the abuse of persons for profit: a) forcing individuals to perform work or provide services through the use of force, threats or other coercive methods, in violation of legal provisions regarding working conditions, wages, health and safety; (b) keeping persons in slavery or applying practices similar to slavery, or resorting to other procedures for the deprivation of liberty; c) Commercial or non-commercial sexual exploitation; (d) forcing someone to donate organs, tissues, or other parts of the human body; (e) the use of women as surrogate mothers or for reproductive purposes; (f) abusing the rights of children for the purpose of illegal adoption; (g) Use in armed conflicts or illegal military formations; (h) Use in criminal activities; (i) forced begging; (j) selling them to another person; k) forcing them to carry out activities that violate fundamental human rights and freedoms.

**EHS Committee:** is any organization of workers for the purpose of furthering and defending the interests of workers with regard to working conditions and terms of employment.

**Environment:** surroundings relative to the facility, including the air, water, land, natural resources, flora, fauna, humans and the interrelation of all these elements.

**Incident:** an event that generated an accident or may potentially lead to an accident.

**Indirect workers or contracted workers:** people employed or engaged through third parties to perform work related to core functions of the project, regardless of location.

**Non-conformity:** non-compliance with a requirement. Prevention of pollution can include source reduction or elimination, process, product or service changes, efficient use of resources, material and energy substitution, reuse, recovery, recycling, reclamation and treatment.

**Objective:** refers to the general purpose, resulted from the policy, being pursued by the organization and quantified where possible.

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**Other stakeholders** are those not directly affected by the project but that have an interest in it. These could include national and local authorities, neighbouring projects, and/or nongovernmental organizations.

**Parties Concerned:** a party or group concerned or affected by the organization's performance.

**Performance:** represents the quantifiable results of the Management System, related to the organization's control over its aspects and dangers, based on the policy, objectives and purposes.

**Personal Characteristic:** such as gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disabilities, age, or sexual orientation.

**Policy:** general intents and purposes of a certain organization related to ESHS, as they are officially expressed by the top management.

**Primary supply workers:** people employed or engaged by the Borrower's primary suppliers.

**Procedure:** specified way to carry out an activity or a process. Procedure can be documented or not.

**Process:** set of correlated or interrelated activities, which turns the input elements into output elements.

**Record document:** stating results achieved or providing evidence of activities performed.

**Risk Assessment:** process of general risk impact assessment and decision as to the level of risk tolerance.

**Risk:** combination of probability of appearance and consequences of a certain dangerous event.

**Safety:** lack of any unacceptable risk of injury.

**Specific Objective:** refers to detailed performance requirement, quantified when possible, applied to the organization as a whole or to its certain part, which results out of general environmental objectives and which must be established and fulfilled in order to achieve the latter objectives.

**Stakeholders:** are defined as persons, groups or communities external to the core operations of a project who may be affected by the project or have interest in it. This may include individuals, businesses, communities, local government authorities, local nongovernmental and other institutions, and other interested or affected parties.

**Supply chain:** refers to materials, components, goods or products for use in on-going operations.

**Tolerable Risk:** refers to the risk reduced to a "tolerable" level that can be endured by the organization, taking into account its own legal obligations and its own ESHS Policy.

**Trafficking in Persons:** is defined as the recruitment, transportation, transfer, harbouring, or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power, or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Women and children are particularly vulnerable to trafficking practices.

**Sexual harassment:** Any unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature.

**Sexual Exploitation and Abuse (SEA):** (i) Sexual abuse: Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes including but not limited to profiting monetarily socially or politically from the sexual exploitation of another (UN Glossary on SEA/SH, 2017.p.6). Sexual Abuse: actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions (UN Glossary on Sexual Exploitation and

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Abuse 2017, pg. 5).

**Violence against women (VAW):** Article 1 of the 1993 UN Declaration on the Elimination of Violence against Women defines violence against women as any act of gender based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life.

**Gender-based violence (GBV) service provider:** An organization offering specific services for GBV survivors, such as health services, psychosocial support, shelter, legal aid, safety/security services, etc.

**Gender-based violence<sup>2</sup> (GBV):** Gender-based violence (GBV) is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e., gender) differences between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty.

**Commercial sexual exploitation:** the use of a person through coercion in prostitution or in the pornography industry in exchange for financial means or other material benefits.

**Non-commercial sexual exploitation:** the use of a person through coercion, without material interest, expressed in marriage (including polygamous) or cohabitation.

**Child:** a person who has not reached the age of 18.

**Confiscation of documents:** the deprivation of any documents referred to in point 5 from a person who is the victim of exploitation.

**Debt bondage:** the deprivation of a person's liberty until they or a third party pays a legally or illegally established debt.

**Slavery:** is defined as the status or condition of a person over whom one or more rights derived from the right of ownership are exercised.

**Practices similar to slavery:** the state of a person who is held or placed in a situation where another person controls them or forces them, through deception, threats, violence or other coercive means, to perform certain services, including entering or remaining in a cohabitation or marriage relationship.

**State of vulnerability:** a special state in which a person is willing to submit to abuse or exploitation, particularly due to: a) a precarious situation in terms of social survival; b) their age, pregnancy, illness, disability or physical or mental impairment; c) their precarious and illegal entry or stay in the country of transit or destination;

**Victim of human trafficking:** is a natural person who is found to be subject to trafficking in human beings.

## 3.2 Acronyms

|         |                                                          |
|---------|----------------------------------------------------------|
| CESMP   | Contractor's Environmental and Social Management Plan    |
| CL&OHSP | Contractor's Labor & Occupational Health and Safety Plan |

<sup>2</sup> Guidelines for Integrating Gender-Based Violence Interventions in Humanitarian Action: [https://gbvguidelines.org/wp/wp-content/uploads/2015/09/2015-IASC-Gender-based-Violence-Guidelines\\_lo-res.pdf](https://gbvguidelines.org/wp/wp-content/uploads/2015/09/2015-IASC-Gender-based-Violence-Guidelines_lo-res.pdf)



Ministry of  
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Regional Development

## THE MOLDOVA ROAD PROJECT V

The Project's specific Complaint Mechanism for  
reconstruction of the express road M1  
Lot no.2 (km 9+208 – km 38+800)

### THE TECHNICAL DESIGN STAGE – REQUIREMENTS



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| CoC  | Code of Conduct                         |
| DD   | Detail design                           |
| EA   | Environmental Agency                    |
| EHS  | Environmental and health and safety     |
| EIA  | Environmental impact assessment         |
| ESP  | Environmental and Social Policy         |
| ESRs | Environmental and Social Requirements   |
| GD   | Government Decision                     |
| HR   | Human Resources                         |
| KPIs | Key performance indicators              |
| LPA  | Local public authority                  |
| MMS  | Meter Management System                 |
| MS   | Method Statement                        |
| NAPH | National Agency for Public Health       |
| NGOs | Non-Governmental Organisations          |
| OHS  | Occupational health and safety          |
| PIU  | Project Implementation Unit             |
| PMU  | Project Management Unit                 |
| PPE  | Personal protective equipment           |
| PTW  | Permit-to-Work                          |
| SMR  | Subcontractor management representative |
| SOPs | Safety Operational Procedures           |
| SSA  | State supervision agency                |
| TLI  | Territorial labor inspection            |
| TMP  | Traffic management plan                 |
| TS   | Technical specification                 |



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## 4 PRINCIPLES OF THE COMPLAINT MECHANISM

The following principles shall be applicable for the Project's Grievance Mechanism:

**Representativeness** - Each party to the project will designate those responsible for the resolution of complaints within the Complaint Mechanism

**Transparency** - All complaints will be public; the complaint resolution process will be public (except in cases where anonymity is requested by the complainant). The experience gained will serve to reduce the incidence of events with negative social and environmental impact and mitigate risks

**Operability** - All incidents with a negative social and environmental impact will be addressed immediately, without delay, regardless of the extent of the impact or level, individual or collective.

**Legality** - The mitigation measures for risks with social and environmental impact will correspond to the relevant National Legislation and the EBRD Performance Requirements.

**Avoidance (preventive actions)** - The Grievance Mechanism will focus in particular on activities to minimize risks and prevent negative social impact

**Equality and non-discrimination** - Any person, regardless of age, gender, race, ethnicity, confession, sexual orientation or social status, will benefit from the same treatment. The Grievance Mechanism will contribute to discouraging discrimination, will contribute to increasing participation in community economic and social life and reducing social exclusion

## 5 BENEFITS OF THE GRIEVANCE MECHANISM

Like any participatory management system, the Complaint Mechanism of the Project must provide benefits and correspond to the interests of all parties involved.

| Benefits of the PCM for the institutions responsible for implementing the Project                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Benefits of PCM for people & affected communities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| <ol style="list-style-type: none"> <li>1. Provides sufficient information to the public about the project implementation process,</li> <li>2. Provides a system of clear procedures for participants to comply with national policies and EBRD PRs,</li> <li>3. Provides a forum for resolving grievances and disputes at the lowest level of the Project,</li> <li>4. Resolve disputes that arise at short notice, before they degenerate into large-scale conflicts,</li> <li>5. Facilitates effective communication between the Project and affected persons,</li> <li>6. It helps to gain the community's trust in the Project and contributes to the productivity of collaboration between the parties,</li> <li>7. Ensures the distribution of responsibilities in the complaint-handling process,</li> <li>8. Reduces or prevents the adverse impacts of the Project on communities and produces risk prevention activities,</li> <li>9. Helps avoid project delays, increase costs, and improve the quality of work</li> </ol> | <ol style="list-style-type: none"> <li>1. Reduces and/or prevents the adverse impacts of the Project on communities and produces risk prevention activities,</li> <li>2. It provides an efficient method for reporting complaints and presenting proposals related to the implementation of construction works in the affected localities,</li> <li>3. Establish a forum for early detection of social risks and immediate reporting of incidents,</li> <li>4. It constitutes a platform for access to a fair and neutral hearing for the individual and the community,</li> <li>5. Provides access to and influence over project decisions and policies that could negatively affect individual and collective interests,</li> <li>6. Facilitates access to information on the implementation of the Project.</li> </ol> |



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## 6 ROLES AND RESPONSIBILITIES

| The institution                        | Roles                         | Responsibilities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <b>The Employer</b>                    | General management of the PCM | <ol style="list-style-type: none"> <li>1. Monitor the complaint resolution process</li> <li>2. Develops and maintains the Register for the registration and monitoring of complaints;</li> <li>3. Reports to the GoM and EBRD information on the functioning of the PCM;</li> <li>4. Provides assistance and conducts training to strengthen the operating capacities of the PCM</li> <li>5. Informs the public about the functioning of the PCM, develops and distributes information materials on the PCM;</li> <li>6. Provides contact details for receiving complaints;</li> <li>7. Receives complaints and forwards them to the parties responsible for solving them;</li> <li>8. Ensures communication with complainants for the purpose of resolving complaints in a manner acceptable to the complainant;</li> <li>9. Publishes responses to complaints, unless complainants request otherwise due to confidentiality or other reasons;</li> <li>10. Report and get feedback on the results of the PCM.</li> </ol> |
| <b>SIMC</b>                            | Facilitates the PCM process   | <ol style="list-style-type: none"> <li>1. Collect complaints from communities affected by the project;</li> <li>1. Fill in the Local Complaints Register;</li> <li>2. Assists the population in filling in and sending complaints;</li> <li>3. Submit complaints to the Supervision Consultant, Employer/PIU;</li> <li>4. Facilitates organisational field inspections for the examination and resolution of complaints;</li> <li>5. Provide feedback to affected individuals and agencies involved in resolving grievances.</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>District Councils</b>               | Assist the Employer           | <ol style="list-style-type: none"> <li>1. Provides contact details for receiving complaints (address, telephone, email);</li> <li>2. Collect complaints from communities affected by the project;</li> <li>3. Conducts field inspections to verify reported complaints and the quality of their resolution;</li> <li>4. Notifies the violations detected in the complaints to national agencies for technical surveillance, public order, environmental protection for the cases provided for by the legislation in force;</li> </ol> <p>- Monitoring the process of resolving complaints by contractors and reports monthly to the Employer.</p>                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Local Public Authorities (LPAs)</b> | Facilitates the PCM process   | <ol style="list-style-type: none"> <li>1. Contributes to the formation of SIMC by appointing local members;</li> <li>2. Provides places for the placement of special panels for displaying information on PCM or spaces on existing panels for displaying information;</li> <li>3. Provides contact details for receiving complaints (address, phone, email)</li> <li>4. Collects complaints from the inhabitants of the communities affected by the project and forwards them to the responsible institutions;</li> </ol> <p>- It provides places for the placement of anonymous complaint collection boxes.</p>                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>The General Contractor</b>          | Respond, resolve and report   | <ol style="list-style-type: none"> <li>1. Ensures the implementation of the Project's specific ESMP, LMP, CoC, TMP, etc. implements appropriate measures to mitigate the negative social and environmental impact;</li> <li>2. Makes contact details available to the public for receiving complaints (address, telephone, email, etc.);</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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| The institution        | Roles              | Responsibilities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|                        |                    | <ol style="list-style-type: none"> <li>3. Installs complaint collection boxes in each LPAs affected by construction works;</li> <li>4. Install information panels at the construction sites and in the town halls of the localities where the project is implemented (in case of non-existence of panels);</li> <li>5. Maintains and updates the Register of Complaints ex officio and from construction sites;</li> <li>6. Ensures the registration of the complainants in the Complaints Register and the information of Employer/PIU and the Supervisory Consultant regarding the receipt of the complaint;</li> <li>7. Informs the complainant about the receipt and deadline for examining the complaint;</li> <li>8. Coordinates with the complainant the action plan for the resolution of the complaint;</li> <li>9. Informs the complainant about the actions aimed at solving the complaint and the period of their completion;</li> <li>10. Updates the Complaints Register with the change in the status of the complaint and informs Employer/PIU and the Supervision Consultant regarding the status update;</li> <li>11. Removes damage caused by construction works to infrastructure, public and private property;</li> <li>12. Removes damages and compensates damages for damages caused to affected employee workers due to non-compliance of contractual obligations and/or non-compliance with working conditions, safety requirements caused by the fault of the Employer/PIU;</li> <li>13. Places in the formation on the functioning of the PCM in the offices of the LPAs and on the construction sites;</li> </ol> <ul style="list-style-type: none"> <li>- Provides training for staff on the operation of the PCM and the complaints mechanism for employees</li> </ul> |
| Supervision Consultant | Monitor and report | <ol style="list-style-type: none"> <li>1. Monitors the process of resolution of complaints by contractors and reports monthly to Employer/PIU;</li> <li>2. Regularly checks the Contractor's complaints registers;</li> <li>3. Confirms the resolution of the complaint by the Contractor and the Claimant's acceptance;</li> <li>4. Provides contact details for receiving complaints (address, phone, email)</li> <li>5. Reports to the Employer/PIU on the status of complaint resolution;</li> <li>6. Conducts field inspections to verify the authenticity and eligibility of reported complaints and verifies the complaint handling process;</li> </ol> <ul style="list-style-type: none"> <li>- It notifies the violations detected in the complaints of the national agencies for technical surveillance, public order, environmental protection for the cases provided by the legislation in force.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

## 7 BENEFICIARIES OF THE COMPLAINT MECHANISM

The Project's Complaint Mechanism will be available to all stakeholders of the project and will constitute a platform for asking questions, comments, proposals and submitting complaints (complaints, petitions) or for presenting any forms of feedback (reaction) on the activities carried out within the project.

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It is assumed that PM will be used in particular:

1. **Inhabitants of villages affected by construction works** whose living environment and quality of life may be affected during the construction works in the locality;
2. **Land owners and members of their families**, whose agricultural plots will be subject to the expropriation process for the needs of carrying out the construction works and whose well-being and rights could be affected due to the expropriation process;
3. **People from vulnerable groups** (children, women, disabled, elderly, etc.) whose interests could be affected during the construction works and who could be subjected to additional risks as a result of the construction works being carried out on the territory of the locality;
4. **Employees of contractors and subcontractors** whose contractual interests and rights may be violated;
5. **Economic agents from localities affected** by construction works whose economic activity may be affected by the construction and expropriation process;
6. **LPAs and public institutions** in villages affected by construction works, whose operational activity or heritage may be affected in the construction process.

## 8 CONSULTATION AND PARTICIPATION PROCESS

The Project's ESMS has established, implements and maintains a procedure for consultation and participation of workers and the community during the construction works on site and use actions for improvement of the ESMS:

- a) provide mechanisms, time, training and resources necessary for consultation and participation;
- b) provide timely access to clear, understandable and relevant information about the Project's ESMS;
- c) determine and remove obstacles<sup>3</sup> or barriers to participation and minimize those that cannot be removed;
- d) emphasize<sup>4</sup> the consultation of non-managerial workers and affected community on the following
  - (i) needs and expectations of interested parties, (ii) the Project's ES Policy, (iii) roles, responsibilities and authorities for implementation process, (iv) compliance with legal requirements and EBRD PRs and (v) The Project's ES Objectives and planning to achieve them, (vi) Actions to controls for outsourcing process (procurement and contractors), (vii) Monitoring, measurement and evaluation process, (viii) The Project's Audit Program and (ix) the project's Continual Improvement Process.
- e) emphasize the participation of community and workers in the following: (i) mechanisms for their consultation and participation, (ii) inform about the Project's ES risks and opportunities, (iii) Actions to eliminate hazards and reduce ES risks, (iv) competence requirements, training needs, training and evaluating training, (v) determining what needs to be communicated and how this will be done and (vi) determining control measures and their effective implementation and use

<sup>3</sup> Note: Obstacles and barriers can include failure to respond to workers/community inputs or suggestions, language or literacy barriers, reprisals or threats of reprisals and policies or practices that discourage or penalize worker participation.

<sup>4</sup> Note: Emphasizing the consultation and participation of non-managerial workers is intended to apply to persons carrying out the work activities, but is not intended to exclude, for example, managers who are impacted by work activities or other factors in the organization.

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7) investigating incidents and nonconformities and determining corrective actions.

## 9 ORGANIZATION AND FUNCTIONING OF THE PCM

In order to respond efficiently to the concerns and complaints of the public and affected persons regarding the implementation of the project, a three-tier complaint management structure will be established.

Thus, the persons affected by the project and the stakeholders at the local level (level of rural localities) will have the possibility to submit complaints directly to the General Contractor, either directly at the construction site, i.e. at the place where the construction works are carried out, or in the Contractor's office using the available contact details (Level 1 of the PGM).

At **Level 1**, the complainant can address a complaint directly at the construction site to the Contractor's CM manager, or he will address the SIMC members in the locality, which will serve as a local focal point for collecting complaints from the population and public and private institutions and subsequent retransmission to the Contractor/site manager. The site MSR manager or SIMC member will assist the claimant in completing the complaint and register it accordingly in the Site Complaints Register.

If the problem cannot be solved at Level 1 (site / local), through direct communication between the Contractor and the complainant or SIMC, then the complaint will be escalated by the SIMC to a higher level, i.e. either at the level of the district authorities - Level 2 of the PCM, or transmitted directly to the Employer/PIU (Level 3). At **Level 2**, the responsible persons from the relevant subdivisions of the District Council (such as a) construction, urban planning and cadastre, b) social assistance and family protection, c) territorial development, etc., depending on the subject of the complaint, will intervene in support of the resolution of the complaint).

If the problem cannot be solved at the district level, then the complaint will be escalated to the third level - the upper level, **Level 3** of the PCM, for the direct involvement of the Employer/PIU and MoIRD.

**Important!** There is no restriction to send the complaint directly to Level 3 of the PCM, if it is considered that the operative intervention of the Employer/PIU is necessary.

Complaints of the General Contractor's employees and sub-contractors can be sent directly to the Supervision Consultant and the Employer /PIU.

For an efficient functioning of the PCM, the following organizational aspects will be observed:

1. Each institution involved in the implementation process of the Project (LPA of level I and LPA of level II (District Council), Supervisory Consultant and the Employer/PIU, etc.) will designate persons responsible for the functioning of the PCM;

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2. After the registration of the complaint, deadlines will be established for the response and resolution of the complaint, about which the complainant will be informed;
3. The actions planned for the resolution of complaints will be consulted in advance and coordinated with the complainant;
4. The parties involved will apply practical arrangements for maintaining confidentiality in the complaint-handling process if requested;
5. There will be several methods of addressing complaints (printed, electronic, direct address, telephone connection);
6. Regardless of the method of submitting the complaint, it will be registered in the Register of Complaints and will be brought to the attention of the Supervision Consultant and the Employer /PIU;
7. The PCM will not prevent any interested party from approaching national courts with petitions/complaints or using other mechanisms provided by the national legislation of the Republic of Moldova.

## 10 AREAS OF COMPLAINTS RESOLVED THROUGH THE PCM

The rehabilitation process of the express way M1 involve deforestation works, execution of foundations, installation of the layers of concrete, etc. For the construction stage, the estimated duration of execution of the rehabilitation process is about 24 months from the date of the start of the works.

As a result of the above, as a result of the construction works, the following non-conformities, grouped into categories, could occur at construction sites or in the localities related to the construction sites and would dissatisfy, disturb the inhabitants and local communities:

**Table 1: Categories of complaints**

| Category                    | Possible complaints                                                                                                                                                                                       |
|-----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Noise pollution             | - Noise and vibrations are generated near localities, residential houses, public institutions, etc.                                                                                                       |
| Air pollution               | - Large amounts of dust are generated by the transport involved in the construction process.<br>- Open fire to solid waste or dry vegetation.                                                             |
| Soil pollution              | - During construction, oil or other pollutants leak out.<br>- Soil compaction with heavy equipment.<br>- Mixing black soil with sterile soil.                                                             |
| Water pollution             | - During construction, oil or other pollutants leak out.<br>- Domestic water is discharged on agricultural land and groundwater is contaminated                                                           |
| Disturbance of public order | - Inappropriate social behaviour of workers in localities and on construction sites.<br>- Consumption of alcohol on the construction site and other prohibited substances with community representatives. |

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| Category                                           | Possible complaints                                                                                                                                                                                                                                                                                                                                                                                                              |
|----------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                    | <ul style="list-style-type: none"> <li>- The Contractor's personnel participate in unauthorized fishing or hunting activities.</li> </ul>                                                                                                                                                                                                                                                                                        |
| Danger to life and health                          | <ul style="list-style-type: none"> <li>- Road incidents or speeding in localities.</li> <li>- The employees of the contractors involved work without protective equipment.</li> </ul>                                                                                                                                                                                                                                            |
| Gender-based violence                              | <ul style="list-style-type: none"> <li>- Non-licentious communication, sexual harassment, human trafficking, etc.</li> <li>- Risks of getting the community sick with HIV-AIDS, STB, etc.</li> <li>- On construction sites there are women who are not employees of the Contractors or children, etc.</li> </ul>                                                                                                                 |
| Damage to private property, including harvest      | <ul style="list-style-type: none"> <li>- Storing construction materials on farmers' land without their consent.</li> <li>- Harvest affected due to construction works.</li> <li>- The contractor used land for the handling of the transport unforeseen for this purpose.</li> </ul>                                                                                                                                             |
| Affecting the rights of expropriated persons       | <ul style="list-style-type: none"> <li>- Failure to comply in the construction process with the established boundaries of the land for the execution of the works.</li> <li>- Failure to pay the established compensation within the established period.</li> <li>- Disagreement with the calculated amount of compensation.</li> </ul>                                                                                          |
| Damage to public property                          | <ul style="list-style-type: none"> <li>- Inappropriate behaviour towards objects of worship, archaeology and historical monuments.</li> <li>- Trees in the public domain have been deforested or affected.</li> </ul>                                                                                                                                                                                                            |
| Damage to local public infrastructure              | <ul style="list-style-type: none"> <li>- The contractor uses local roads, bridges that are not specified in the Traffic Management Plan.</li> <li>- Cracks have appeared in the public infrastructure.</li> </ul>                                                                                                                                                                                                                |
| Failure to comply with working hours               | <ul style="list-style-type: none"> <li>- Excessive lighting or noise pollution at night.</li> </ul>                                                                                                                                                                                                                                                                                                                              |
| Exceeding the area where the works are carried out | <ul style="list-style-type: none"> <li>- Failure to comply with the boundaries for carrying out the works.</li> </ul>                                                                                                                                                                                                                                                                                                            |
| Accumulation of waste                              | <ul style="list-style-type: none"> <li>- Construction waste is deposited in undeveloped places not intended for this purpose.</li> </ul>                                                                                                                                                                                                                                                                                         |
| Blocking of access routes for transport and people | <ul style="list-style-type: none"> <li>- The population does not have access to the fields and cannot carry out agricultural work.</li> <li>- The roads are closed or blocked during construction.</li> </ul>                                                                                                                                                                                                                    |
| Violation of employees' rights                     | <ul style="list-style-type: none"> <li>- Employing children at work.</li> <li>- Hiring community personnel without employment contracts, etc.</li> <li>- Discrimination against people in the process of temporary employment in the workplace.</li> <li>- Violation of employees' contractual rights (non-payment of wages, non-compliance with the established work schedule, physical and moral harassment, etc.).</li> </ul> |

**Table 2: Examples of solutions to complaints**



|                                                                                                                                                      |                                                                                                                                                                                                                                                                                          |                                                                                     |
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| Types of Claims/Complaints                                                                                                                                | Solutions and recommendations provided                                                                                                                                                                                                                                                                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Damage to walls and roofs due to vibrations and heavy vehicle traffic<br>2. Damage to access roads, sidewalks and drains                               | 1. Temporary evacuation of residents<br>2. Recommendation for performing vibration tests<br>3. Carrying out assessments on the current condition of damaged houses<br>4. Elaboration and implementation of a plan for the removal and compensation of the damage caused<br>5. Modification of the circulation route of tonnage transport |
| Blocking or destroying access routes                                                                                                                      | 1. Issuance of letters of assurance regarding the reconstruction or repair guarantee after the completion of the construction works<br>2. Using alternative access roads<br>3. Rehabilitation by the Contractor of drainage systems, roads, bridges damaged in the construction process                                                  |
| 1. Damage to private property<br>2. Crop damage                                                                                                           | Payment of compensation for the damage caused and removal of the consequences caused                                                                                                                                                                                                                                                     |
| Noise and air pollution                                                                                                                                   | 1. Regular water spraying to control dust emissions<br>2. Changes in the traffic plan that would minimize inconvenience to communities                                                                                                                                                                                                   |
| Abuse or violence against women in affected localities by contractor's employees                                                                          | 1. Involvement of the local police in solving the case<br>2. Staff meeting on violence against women<br>3. Sanctioning of guilty persons according to the provisions of national legislation and contractual provisions<br>4. Psychological assistance for victims of abuse and compensation of damages                                  |
| The contractor's employees do not comply with the recommendations and prescriptions of the authorities regarding the prevention of the spread of COVID-19 | 1. Training employees on how to protect against COVID-19<br>2. Sanctioning of guilty persons according to the provisions of national legislation and contractual provisions<br>3. Distribution of anti-covid protective equipment among employees (masks, disinfectants, etc.)                                                           |

## 11 PROCEDURE FOR LODGING A COMPLAINT

**Confidentiality and conflict of interest** - Complaints can be submitted anonymously and confidentiality will be ensured in all cases, including if the person who filed the complaint is known. For this reason, several ways of filing complaints have been established in order to maintain confidentiality and avoid conflicts of interest of the parties.

The complaint forms (see model in Annex 1) will be available at:

1. the Employer's office,
2. the Supervision Consultant's central office and local offices,
3. in the offices of construction sites,
4. to the SIMC's members,
5. at the secretariat of the town halls,
6. can be downloaded from the Employer's website<sup>5</sup>.

<sup>5</sup> Source: <https://www.andsa.md/petitii-online/>



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Also, copies of the form will exist in places where the General Contractors' workers can obtain them easily and confidentially. Examples of such places: human resources offices, site offices, local public administration and other places where workers spend a lot of time.

The electronic version of the forms is available for download from the website of the Employer NRA. Forms will be available in three languages: Romanian and English.

The following ways are established, through which citizens, persons affected by the project, employees of the General Contractor can file complaints regarding the activities financed by the project:

**Table 3: Methods of sending complaints**

|                                                                          |                                                                                                                            |
|--------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| <b>By e-mail to:</b>                                                     |                                                                                                                            |
| 1. Supervision Consultant                                                | TBI                                                                                                                        |
| 2. Employer                                                              | <a href="https://www.andsa.md/petitii-online/">https://www.andsa.md/petitii-online/</a>                                    |
| 3. Hincesti District                                                     | <a href="mailto:consiliul@hincesti.md">consiliul@hincesti.md</a>                                                           |
| 4. Local SIMC                                                            | To be established                                                                                                          |
| 5. MoIRD and PPA                                                         | <a href="https://midr.gov.md/petitii">https://midr.gov.md/petitii</a>                                                      |
| <b>In writing, by post or direct deposit to the following addresses:</b> |                                                                                                                            |
| 1. Supervision Consultant                                                | TBI                                                                                                                        |
| 2. Employer/PIU                                                          | <a href="https://www.andsa.md/petitii-online/">https://www.andsa.md/petitii-online/</a>                                    |
| 3. Hincesti District                                                     | <a href="mailto:consiliul@hincesti.md">consiliul@hincesti.md</a>                                                           |
| 4. Local SIMC                                                            | To be established                                                                                                          |
| 5. MoIRD and PAA                                                         | <a href="https://midr.gov.md/petitii">https://midr.gov.md/petitii</a>                                                      |
| <b>By phone call:</b>                                                    |                                                                                                                            |
| 1. Supervision Consultant                                                | <a href="https://www.andsa.md/petitii-online/">https://www.andsa.md/petitii-online/</a>                                    |
| 2. Employer / PIU                                                        | <a href="mailto:consiliul@hincesti.md">consiliul@hincesti.md</a> , <a href="https://hincesti.md/">https://hincesti.md/</a> |
| 3. Hincesti and Nisporeni Districts                                      | Asper procedure established in revised SEP                                                                                 |
| 4. Local SIMC                                                            | <a href="https://midr.gov.md/petitii">https://midr.gov.md/petitii</a>                                                      |
| 5. MoIRD and PAA                                                         | <a href="https://www.andsa.md/petitii-online/">https://www.andsa.md/petitii-online/</a>                                    |
| <b>Through mobile messaging applications (WhatsApp, vibe, etc.) at:</b>  |                                                                                                                            |
| 1. Supervision Consultant                                                | <a href="https://www.andsa.md/petitii-online/">https://www.andsa.md/petitii-online/</a>                                    |
| 2. Employer / PIU                                                        | <a href="mailto:consiliul@hincesti.md">consiliul@hincesti.md</a> , <a href="https://hincesti.md/">https://hincesti.md/</a> |
| 3. Hincesti District                                                     | To be established                                                                                                          |
| 4. Local SIMC                                                            | <a href="https://midr.gov.md/petitii">https://midr.gov.md/petitii</a>                                                      |
| 5. MoIRD and PAA                                                         | <a href="https://www.andsa.md/petitii-online/">https://www.andsa.md/petitii-online/</a>                                    |

Complaints/claims will be submitted as follows:

1 Written complaint will be submitted to the City Hall secretariat or to the members of the Social Impact Monitoring Committee (SIMC). The Secretariat of the City Hall is designated as the **point of receiving** complaints from the inhabitants of the villages represented by the SIMC.

Also, complaints can be sent directly to the Supervision Consultant, Contractor /Employer by email or traditional mail.

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The complainant shall complete the complaint using the form set out in Annex 1 or in any other convenient form, at his or her understanding and convenience, in the language convenient to the complainant.

The complainant may request the assistance of the members of the SIMC or the specialists responsible for the operation of the PCM from the Employer/PIU, APL of level II (district Council), the Contractor to fill in the complaint form.

Complaints can be registered anonymously, if the affected persons request it. This will be clearly indicated in the Form.

The person receiving the complaint will fill in the parts of the form intended for the registrar of the complaint and register it in the Register of Complaints. The complainant can attach to the complaint form any other evidence/testimonies in favour of arguing the complaint (photo, video, documents, etc.). A copy of the duly registered complaint form will be given to the complainant.

In the case of complaints sent by telephone and electronically, the complaint registration form will be filled in entirely from the complainant's words or message by the representatives of the institution that received the complaint (from the Contractor), indicating the method of receiving the complaint. A copy of the completed form with the explanation of the problem, will be sent to the Complainant by e-mail or photocopy through mobile messaging applications such as Viber, WhatsApp, telegram, etc., as confirmation of the registration of the complaint.

2 The completed forms or other forms of presentation of a complaint can be left in the box intended for the collection of complaints located at the headquarters of the local town halls. The local representatives of the SIMC will ensure the regular verification of the complaint collection boxes and the transmission of the complaints received by this method to the Supervision Consultant and the Employer/PIU.

3 Claimants may call the General Contractor directly and request a meeting to discuss a complaint, with the obligation for the Contractor to register the complaint and inform the Supervision Consultant and the Employer.

In addition, for the efficiency of notifying the parties involved in the MSR, the following contact details will be displayed at the LPA headquarters and construction sites

**Table 4: Emergency contact details**

| <b>The institution</b>   | <b>Phone Number</b> | <b>Email address</b> |
|--------------------------|---------------------|----------------------|
| Employer NRA Secretariat |                     |                      |
| EHS Specialist           |                     |                      |
| Social Specialist        |                     |                      |

|                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                     |
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| The institution                    | Phone Number | Email address |
|------------------------------------|--------------|---------------|
| Technical Specialist               |              |               |
| Supervision consultant             |              |               |
| Local SIMC (Chairman)              |              |               |
| Contractor (Communication Officer) |              |               |
| City Hall                          |              |               |
| Police, local office               |              |               |
| Police, district office            |              |               |
| Fire Department                    |              |               |
| Gas Intervention Service           |              |               |
| AST District Office                |              |               |
| Environment Agency                 |              |               |

## 12 COMPLAINT PROCEDURE

1 After submitting and registering the complaint, it will be presented urgently to the General Contractor for the designation of those responsible for investigating/solving the complaint. The Supervision Consultant, Employer/PIU will be notified about the registration of the complaint.

After determining the person responsible for the investigation and resolution of the complaint, the parties involved will ensure that there is no conflict of interest, that all persons involved in the examination process have no material, personal or professional interest in the outcome of the examination of the complaint, and have no personal or professional ties with the petitioners or witnesses.

2 The General Contractor or other entity responsible for solving the complaint, when setting the deadline for solving the complaint and responding to the complainant, will take into account the category of the complaint and the extent of its social and/or environmental impact, but will not exceed the deadline provided by the SIMC Regulation – 15 days.

**Important! At the same time, if the complaint contains obvious information/evidence regarding damages or dangers of causing damage to individuals, public and private property, the environment, affecting public safety and security, the parties involved in the settlement of the complaint (the Supervisory Consultant, Employer/PIU) will react immediately to investigate and solve the case and will set a reasonable deadline for the removal of the cases and avoid the extension of effects, of which the applicant will be informed.**

The deadline for examining the complaint may be extended, which will be done by the complainant, in the event that: (i) further consultations are required to prepare the response to the complaint and (ii) The complaint refers to a complex volume of information or if it is necessary to study additional materials for the preparation of the response.

1. Once the persons responsible for investigating/resolving the complaint and the time for

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responding and solving the complaint have been established, the person responsible for managing the MSR records will enter this data into the Complaints Register and will inform the complainant, Employer, the Supervision Consultant, about the expected time for the response and resolution of the complaint.

2. For the examination of the complaint, the responsible persons will collect facts in order to obtain a clear picture of the circumstances of the complaint. The investigation of complaints may require on-site visits, examination of documents and a meeting with persons who could help resolve the complaint issue. The Supervision Consultant will participate in the investigation process, and the result of the investigation will be recorded in a Report.
3. The complainant will be informed of the results of the examination by letter, in electronic form or by post, depending on how the complaint was received or how the response was requested by the complainant. The response will be prepared on the basis of the examination materials and, where appropriate, will contain references to national legislation and the EBRD's Performance Requirements.

In case of confirmation of the validity of the complaint, the entity responsible for solving the complaint will propose to the complainant the actions to remedy the problems that constituted the basis of the complaint with the indication of the deadlines for implementation, and the complainant in turn will accept or reject them.

The results of the examination and the response sent to the applicant will be brought to the attention of the Supervision Consultant and the Employer / PIU.

4. The Supervision Consultant will monitor the status of the complaint, confirm its resolution and the complainant's acceptance of the complaint.
5. If, within the deadline set for solving the complaint, the complainant does not receive any response, or the problem invoked in the complaint remains unresolved, or the remedial proposals are not accepted by the complainant, or the complainant is not satisfied with the quality of the complaint resolution, he will notify one of the following institutions: the Supervision Consultant and the Employer/PIU.

## **13 MONITORING AND REPORTING**

The General Contractor and the Supervisory Consultant will report monthly to the Employer the list of all complaints received and the status of the resolution of the complaints from the previous month ("in the process of resolution" or "resolved").

The report will contain information on:

1. Category of complaint;
2. Contact details of the Complainant;

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3. The affected communities of the subject of the complaint;
4. Brief description of the complaint, if applicable presentation of photo, audio and video images;
5. Description of the causes that led to the occurrence of the complaint;
6. The proposed solution for solving the complaint accepted by the complainant or the argument for the rejection of the complaint;
7. The status of the resolution of complaints from the current and previous month.

Based on the information received from the Supervision Consultant, the Employer will evaluate the operation of the PCM on a semi-annual and annual basis in order to: (i) present to the PMU semi-annual and annually reports an overview of the results of the operation of the PCM, including suggestions and questions and (ii) analyses the status of complaints to monitor which complaints have not yet been resolved and propose necessary remedial measures.

The Employer NRA will publish semi-annual reports on the functioning of the PCM on its website.

### **Reporting in the semi-annual and annual reports submitted to the EBRD**

The Employer will include in the half-yearly project progress reports submitted to the EBRD a dedicated section on the PCM, in which it will provide updated information on the following:

1. Status of the establishment of the PCM (procedures, personnel, awareness (information) of the population, etc.);
2. Quantitative data on the number of registered complaints and the number of those solved, the deadline for resolution;
3. Qualitative data on the type of complaints, the most frequent causes of complaints;
4. Any particular aspects encountered in the case of the operation of the PCM;
5. Factors that may affect the use of PCM;
6. Any corrective measures adopted by stakeholders to reduce the number of complaints related to the Project implementation process and reduce the time to resolve complaints.

## **14 DISCLOSURE OF THE COMPLAINT MECHANISM**

Specific stakeholders from the Hincesti and Nisporeni Districts and affected villages and commune from the Hincesti and Nisporeni Districts shall know about the existence of PCM and the methods of using it. To this end, permanent information will be provided to the inhabitants of the villages affected by the construction works, to the contractors' workers, to the members of the SIMC and to the representatives of the LPAs on the existence and operating procedures of the PCM.

To this end, the Social and Environmental Consultants of the Supervision Consultant with support of the Employer will organize training sessions and disseminate informational materials on the following topics:

1. what a complaint entail,
2. what problems can be complained of,

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3. how a complaint can be submitted,
4. where the necessary forms are obtained,
5. who can help fill in complaints,
6. how to submit an anonymous complaint,
7. who can be contacted if you do not agree how the complaint was resolved,
8. where you can find more information about PCM.

Information on the operation of the PCM will be placed on all information panels that are located in the crowded areas of the localities affected by the project and in the access areas of contractors' workers, such as:

1. at LPA headquarters, construction sites, contractors' offices, Employer office, etc.
2. in workshops, changing rooms, canteens and other places where contractors' staff gather;
3. if contractors' employees have access to electronic mail, they will receive the information about the PCM by email.

The information on the PCM will be available on the website of the LPAs and the Employer /PIU, as well as will be included as a topic in the communication with stakeholders during the events organized within the project.

The Employer will provide information on the scope of the PCM, the eligible criteria for lodging complaints, the procedure for lodging the complaint, the examination process, the examination deadlines, as well as the principle of confidentiality and the right to lodge anonymous complaints.

At the same time, the PCM will be pro-active and will focus on activities to prevent situations of risk of damage for people and communities in the localities where construction works are carried out. Thus, the General Contractor, the Supervisory Consultant and the Employer, will use the following methods to communicate with the public:

1. Media briefings,
2. Announcements/informative notes placed on the notice boards of the local City Hall and the Contractor,
3. Meetings with the population,
4. Printed products such as posters, flyers, flyers, information letters, etc.,
5. Reports published on the websites of the Employer,
6. Ads placed on the websites of the LPAs and the Employer.

In order to promote and strengthen dialogue with stakeholders as well, in order to ensure full compliance with the relevant requirements of the EBRD and national legislation, the Employer, the Supervisory Consultant and the General Contractor will research the use of other methods of communication/interaction with affected communities.

Particular attention for the efficient functioning of the PCM will be paid to the process of direct communication with the inhabitants of the affected villages. For this purpose, the Employer and the Supervision Consultant and General Contractor will organize:

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1. **Informative meetings/presentations at all stages of the works** - to which the inhabitants of the affected villages, SIMC members, LPAs representatives and organizations from the associative sector in the affected localities will be invited.
2. **Field visits for documentation/information** – actions that prove to be very effective in identifying positive experiences and achievements.
3. **Green line of the Employer NRA** – operative service available around the clock. It collects information about accidents, complaints, etc.
4. **Supervision Consultant contact phones** – to report without delay about any accidents, incidents produced or potential risks to the community, or individual, including to the Contractors' employees.
5. **Contractors contact phones** – to report without delay about any accidents, incidents produced or potential risks to the community, or individual, including to the Contractors' employees.
6. **The Employer's ES Consultants** – ES consultants will monitor the progress of the removal of the causes that caused accidents or incidents, the resolution of complaints, etc.

## 15 EBRD INDEPENDENT PROJECT ACCOUNTABILITY MECHANISM

The EBRD's Independent Project Accountability Mechanism (IPAM) addresses concerns raised by project-affected people and organisations in relation to obligations of the Bank as per the Environmental and Social Policy (ESP) and Access to Information Policy (AIP). IPAM reports directly to the Board of Directors and is independent of Bank management.

**The applicants.** A complaint can be submitted by one or more persons or their representatives, who believe that the project under implementation is directly and negatively affected.

**Privacy.** If the complainant requests that their identity be kept confidential, the confidentiality request is sent with the complaint. If this is not specified in the complaint, the EBRD's IPAM will coordinate with the complainant if confidentiality of the complaint is requested. IPAM will maintain the confidentiality of personal information as requested by the complainants.

**Anonymous complaints.** Anonymous complaints are not processed by IPAM. However, if an anonymous complaint contains relevant information about specific project-related issues, SSR may submit it to TTL for information and monitoring, as appropriate.

Complaints to the EBRD's IPAM will be submitted directly by the affected persons, using one of the methods listed below:



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| <p><b>Contact IPAM</b></p> <p>For more information on the IPAM process and how to submit a complaint, write to:</p> <p>Email: <a href="mailto:ipam@ebrd.com">ipam@ebrd.com</a></p> <p>For any other matters:</p> <p>Email: <a href="mailto:ipam_comms@ebrd.com">ipam_comms@ebrd.com</a></p> | <p>Project Complaint Mechanism<br/>Attn: PCM Officer<br/>European Bank for Reconstruction and Development<br/>One Exchange Square London EC2A 2JN<br/>United Kingdom<br/>Fax: +44 20 7338 7633<br/>Email: <a href="mailto:pcm@ebrd.com">pcm@ebrd.com</a></p> |
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## 16 REGISTER OF COMPLAINTS

Each party responsible for the operation of the PCM will have a Complaints Register to monitor the complaint resolution process.

The Supervision Consultant will notify the Employer of any registered complaint by sending a copy of the form completed by the Complainant and registered, and of any change in the status of the complaint, thus ensuring the permanent and simultaneous updating of all Registers held by the parties involved.

The voting registers will be held in electronic form and will have the following headings/compartments:

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Table 5: Structure of the Register for the management and monitoring of complaints

| #  | Category                                      | Method of reception | Name of the complainant | Contact Date | Description of the complaint | Event Address | Deadline set for settlement | Status of the complaint | Actions taken | Closing date | Responsibility |
|----|-----------------------------------------------|---------------------|-------------------------|--------------|------------------------------|---------------|-----------------------------|-------------------------|---------------|--------------|----------------|
| 1  | Noise pollution                               |                     |                         |              |                              |               |                             |                         |               |              |                |
| 2  | Air pollution                                 |                     |                         |              |                              |               |                             |                         |               |              |                |
| 3  | Soil pollution                                |                     |                         |              |                              |               |                             |                         |               |              |                |
| 4  | Water pollution                               |                     |                         |              |                              |               |                             |                         |               |              |                |
| 5  | Disturbance of public order                   |                     |                         |              |                              |               |                             |                         |               |              |                |
| 6  | Affecting the rights of expropriated persons  |                     |                         |              |                              |               |                             |                         |               |              |                |
| 7  | Danger to life &health                        |                     |                         |              |                              |               |                             |                         |               |              |                |
| 8  | Gender-based violence                         |                     |                         |              |                              |               |                             |                         |               |              |                |
| 9  | Damage to private property, including harvest |                     |                         |              |                              |               |                             |                         |               |              |                |
| 10 | Damage to public property & infrastructure    |                     |                         |              |                              |               |                             |                         |               |              |                |
| 11 | Failure to comply with working hours          |                     |                         |              |                              |               |                             |                         |               |              |                |
| 12 | Exceeding the area of the works               |                     |                         |              |                              |               |                             |                         |               |              |                |
| 13 | Accumulation of waste                         |                     |                         |              |                              |               |                             |                         |               |              |                |
| 14 | Blocking access paths                         |                     |                         |              |                              |               |                             |                         |               |              |                |
| 15 | Violation of employees' rights                |                     |                         |              |                              |               |                             |                         |               |              |                |
| 16 | Old Woman                                     |                     |                         |              |                              |               |                             |                         |               |              |                |

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## 17 ANNEXES

Annex no.1: Complaint registration form

Annex no.2: Complaint Register

|                                                                                                                                                      |                                                                                                                                                                                                                                                                                          |                                                                                     |
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## Annex 1: Complaint registration form

|                                                                                                                                                                                                                                                                                                                                                                   |                                    |        |
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| <b>Complaint Registration Form</b>                                                                                                                                                                                                                                                                                                                                |                                    |        |
| <i>Instructions: This form must be completed by the staff receiving the inquiry or complaint and kept in the project file. Attach any documentation/supporting letters as you deem important.</i>                                                                                                                                                                 |                                    |        |
| Date of receipt of the complaint:                                                                                                                                                                                                                                                                                                                                 | Person responsible for completion: |        |
| Complaint level (to be checked ✓): <input type="checkbox"/> National <input type="checkbox"/> District <input type="checkbox"/> City/Village                                                                                                                                                                                                                      |                                    |        |
| How to fill in the form (to be checked ✓):                                                                                                                                                                                                                                                                                                                        |                                    |        |
| <input type="checkbox"/> In person <input type="checkbox"/> Phone <input type="checkbox"/> E-mail <input type="checkbox"/> SMS message <input type="checkbox"/> Website<br><input type="checkbox"/> Complaint Collection Box <input type="checkbox"/> Local Meetings <input type="checkbox"/> Public Consultation Activities <input type="checkbox"/> Other _____ |                                    |        |
| Complainant's Name: <i>(information is optional and always treated as confidential)</i>                                                                                                                                                                                                                                                                           |                                    |        |
| Applicant's gender: <input type="checkbox"/> male <input type="checkbox"/> female                                                                                                                                                                                                                                                                                 |                                    |        |
| Address and contact details of the Complainant: <i>(information is optional and always treated as confidential)</i>                                                                                                                                                                                                                                               |                                    |        |
| Town or place where the subject of the complaint occurred [see below]                                                                                                                                                                                                                                                                                             |                                    |        |
| Municipality / District                                                                                                                                                                                                                                                                                                                                           | City / Village                     | Sector |
| Brief description of the complaint: <i>(Provide details and arguments)</i>                                                                                                                                                                                                                                                                                        |                                    |        |
| <div style="text-align: right;"><i>Applicant's signature</i></div>                                                                                                                                                                                                                                                                                                |                                    |        |
| Attached documents (images, documents, audio, video recordings, explanations, etc.) <i>It should be indicated what is attached:</i>                                                                                                                                                                                                                               |                                    |        |
| Complaint category:                                                                                                                                                                                                                                                                                                                                               |                                    |        |
| Who will be responsible for handling the complaint (name and contact details):                                                                                                                                                                                                                                                                                    |                                    |        |
| Deadline for the complaint and the complainant's response:                                                                                                                                                                                                                                                                                                        |                                    |        |
| Progress in resolving the complaint (e.g. examination, resolution, complainant's response, rejection):                                                                                                                                                                                                                                                            |                                    |        |

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## **Annex 2: Complaint Register format**

The Complaint Register shall contain the following:

- Submission method (phone, email, mail, in person)
- Who received the complaint?
- Submission date
- Name
- Contact details
- Brief description of the complaint
- Location
- Actions taken
- Resolution status
- Date of resolution or rejection
- Responsible
- Type of complaint