

GEF SAVA AND DRINA RIVER CORRIDORS INTEGRATED DEVELOPMENT PROGRAM P175192

SAVA AND DRINA RIVER CORRIDORS INTEGRATED DEVELOPMENT PROGRAM -

ADDITIONAL FINANCING OF P168862

INTERNATIONAL SAVA RIVER BASIN COMMISSION

REGIONAL GRIEVANCE MECHANISM

(Part 4-Regional Cooperation)

April 2024

Introduction

1.2. Project description

The International Sava River Basin Commission (ISRBC) signed on August 31, 2022, the Grant Agreement with the International Bank for Reconstruction and Development as an implementing agency of the Global Environment Facility for the implementation of the Part 4 - Regional Cooperation of the *Multiphase Programmatic Approach (MPA) Sava and Drina Rivers Corridors Integrated Development Program (SDIP) of the Phase I* (Project).

The development objective of the SDIP Phase I is to improve flood protection, and transboundary water resources management in selected catchment areas of the Sava and Drina River corridors contributing to regional economic integration and supporting the EU accession process.

Part 4 - Regional Cooperation aims to strengthen strategic regional dialogue, joint planning and sustainable management and development of the shared water resources in the Sava and Drina River Basins. The component supports policy dialogue, building resilience to climatic shocks, strengthens the nexus between various water uses, promotes intersectoral development synergies and economic cooperation in the Sava and Drina Corridors.

It is worth mentioning that Regional Part of the Project is based on the Joint Plan of Actions for the Sava River Basin developed by the ISRBC with support of the World Bank in 2017 and the Joint Statement on Plan of Action and Milestones for the Sava River Basin as a Catalyst for Cooperation in the region, signed by the representatives of the Parties to the Framework Agreement on the Sava River Basin, and Montenegro, in Bled, Republic of Slovenia, on June 15, 2017, contributing to the efforts of the Parties and Montenegro to ensure sustainable economic development in the Sava River Basin.

The Part 4 of the Project - Regional Cooperation will be implemented through two sub-components:

- *Subcomponent 4.1: Regional dialogue, project management, and coordination.* This subcomponent will support the ISRBC and promote joint action and decision-making in river basin management and flood risk management among riparian countries, thus enhancing the climate adaptation capacity of the region.
- *Subcomponent 4.2: Regional plans, studies, and strategies of basin-wide importance.* This subcomponent will support consultations, preparation of basin plans and studies, and investments to strengthen the nexus between water services and development and economic cooperation objectives of the Sava and Drina Rivers Corridors.

1.2. Project Grievance

The World Bank expects each project to establish such a mechanism in line with ESS10, at the early stage of project development in order to be able to address specific issues in an adequate and timely fashion.

The overall objective of the grievance mechanism is to address complaints, concerns and grievances (hereinafter: grievances or concerns) arising from the implementation of project activities in a fair, effective and transparent manner, with a view to facilitating effective implementation. The grievance mechanism ensures that all grievances are recorded, properly addressed and monitored, with the aim

to increase transparency and accountability, as well as to reduce the risk of the Project’s adverse environmental and social impact.

1. Regional Grievance Mechanism

Regional Grievance Mechanism (RGM) is an institutional arrangement that allows stakeholders to address grievances related to Part 4 of the Project implementation (studies to be developed by the ISRBC) through a timely, transparent, and predictable process.

The principal objective of RGM is to implement and maintain a procedure for handling all types of grievances/concerns of the broad range of stakeholders.

For the purpose of this document “stakeholder” refers to individuals or groups who:

- a) Are affected or likely to be affected by the Part 4 of the Project (project-affected parties) and
- b) May have an interest in Part 4 of the Project (other interested parties).

The RGM includes Regional Grievance Desk (RGD) established and administered by the ISRBC.

The RGD consists of at least 3 members nominated by the Project Director (Executive Secretary of the ISRBC), from the RPIU and/or other staff members of the ISRBC Secretariat. In addition, representatives of national PIUs may be also nominated in the RGD if needed to address a particular grievance or concern in a comprehensive manner.

Office administrator of the ISRBC is responsible for logging the grievances.

The RGD works in meetings and proposes solutions of resolving grievances to the Project Director (Executive Secretary of the ISRBC), who makes final decision about grievances.

Procedures related to grievances handling is posted on the ISRBC website to ensure full transparency.

The RGM is available to the stakeholders and applicable to all activities of Part 4 of the Project implemented by the ISRBC. GRM serves to receive and to respond to grievances and concerns of the stakeholders.

1.1. Raising Grievances

Any grievance can be brought to the attention of the RGM by filling the grievance form in hard copy or on-line, or in any other format as chosen by the grievant. The Grievance form is provided in Annex A. Project Grievance Form.

Any type of grievance can be submitted by mail, fax, phone, e-mail or in person using the below access details:

	International Sava River Basin Commission Kneza Branimira 29/II 10000 Zagreb tel: +385 1 4886960 fax: +385 1 4886986 e-mail: isrbc@savacommission.org

1.2. Grievance Administration

Any grievance shall follow the path of the following mandatory steps: receive, assess and assign, acknowledge, investigate, respond, follow up and close out.

Once logged, the RGD shall conduct a rapid assessment to verify the nature of the grievances and determine on the severity. Within three days from logging, it will acknowledge that the case is registered and provide the grievant with the basic next step information. It will then investigate by trying to understand the issue from the perspective of the complainant and understand what action he/she requires. The RGD will investigate the facts and circumstances and articulate an answer. The final agreement should be issued and the grievant be informed about the final decision not later than 14 business days after the logging of the grievance. Closing out the grievance occurs after the implementation of the resolution has been verified. Even when an agreement is not reached, or the grievance is rejected, the results will be documented, actions and effort put into the resolution.

In case of an anonymous grievance, after acknowledgment of the grievance within three days from logging, the RGD will investigate the grievance and within 15 business days from logging the grievance, issue the final decision that will be disclosed on the ISRBC website.

The ISRBC may provide mediation as an option where a grievant is not satisfied with the proposed resolution and notify the RGD about it in 7 days of the receipt of the final decision.

Nothing in or relating to the RGM shall be deemed a waiver of any of the privileges and immunities of the ISRBC as the international organization under the Seat Agreement between the International Sava River Basin Commission and the Government of the Republic of Croatia¹

The RGM will have regular exchange of information with national GMs to avoid the same concerns that might have been raised through the RGM and national GMs to be conflictingly resolved.

1.3. Grievance Log

The RPIU hosted under the ISRBC will maintain a grievance log to ensure that each grievance has an individual reference number and is appropriately tracked and that recorded actions are completed.

A grievance register log includes grievances received, containing all necessary elements to disaggregate the grievance by gender of the person logging it as well as by type of grievance. Each grievance will be recorded in the register with the following information at a minimum:

- name of the grievant, location and details of the grievance,
- date of submission,
- date of receipt acknowledgment returned to the grievant,
- description of actions taken (investigation, corrective measures),
- date and description of proposed resolution/feedback to grievant,
- date and provision of feedback from the grievant (if any),
- date and result of mediation (if any),
- date when the grievance was closed out.

¹ ISRBC is an international organization with diplomatic status, immunities and privileges in the Republic of Croatia, defined by the [Seat Agreement between the International Sava River Basin Commission and the Government of the Republic of Croatia](#). The above-mentioned status includes ISRBC's immunity from jurisdiction and execution in the Republic of Croatia as the host state.

1.4. Monitoring and Reporting on Grievances

The RGD will be responsible for maintaining the grievance log on the received grievances related to Part 4 of the Project implementation (studies to be developed by the ISRBC), collecting, summarizing, and analyzing the data on the number, substance and status of grievances.

The monitoring reports to the WB will be submitted through the regular project progress reports, which includes a section related to GM which provides updated information on the following:

- Number of regional grievances received, responded, and resolved within an agreed time frame,
- Number of grievances received, in total and at the local level, on the website, disaggregated by complainant's gender and means of receipt (telephone, email, discussion),
- Number of grievances received from affected people, external stakeholders,
- Number of grievances which have been (i) opened, (ii) opened for more than 30 days, (iii) those which have been resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age and location of complainant,
- Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints,
- Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints,
- Number of RGD meetings, and outputs of these meetings (minutes of meetings signed by the attendees, including the complainants to be annexed to the report),
- Trends in time and comparison of number, categories, and location of complaints with previous reporting periods.

2. World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate GRS, please visit <https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit <https://www.inspectionpanel.org/>.

Addresses to send complaints:

Email: grievances@worldbank.org

Fax: +1-202-614-7313

Mail address:

The World Bank Grievance Redress Service (GRS)

MSN MC 10-1018, 1818 H St NW

Washington, DC 20433, USA

Annex A. Project Grievance Form

SAVA AND DRINA RIVERS CORRIDORS INTEGRATED DEVELOPMENT PROJECT

Project Grievance Form

Designation (entered by the Regional PIU)	
First name and Surname (not obligatory) <input type="checkbox"/> I would like to lodge a complaint anonymously. <input type="checkbox"/> Please do not disclose my identity without my consent.	
Contact data Signify the desired manner of contact (by mail, by telephone, by email).	<input type="checkbox"/> By mail: <i>Provide an address for mail delivery:</i> _____ _____ _____ <input type="checkbox"/> By telephone: _____ <input type="checkbox"/> By email: _____
Description of event to which the complaint relates	What occurred? Where did it happen? To which person did it happen? What came out as a consequence of the problem? _____ _____
Date of the event / complaint	
	<input type="checkbox"/> Event that occurred once/complaint (date _____) <input type="checkbox"/> It occurred more than once (how many times? _____) <input type="checkbox"/> Ongoing (a problem that currently exists)
What would you want to be undertaken?	
_____ _____	

Signature: _____

Date: _____

Please send this Form to the following address:

International Sava River Basin Commission
 Kneza Branimira 29/II
 10000 Zagreb
 e-mail: isrbc@savacommission.org