



BANCO DE DESARROLLO  
DE **AMÉRICA LATINA**

# CAF-GEF PROJECTS

# ACCOUNTABILITY MECHANISM

VERSION 05

24 MAY 2014

[MN / VEDPP / DACC – XX]

## Contents

1.	Introduction	3
2.	Administrative Instances, CAF – GEF Projects: Roles, Responsibilities	2
2.1.	<b>Administrative Instances</b>	2
2.2.	<b>Roles and responsibilities</b>	2
3.	Filing of a Grievance or Complaint (G/C)	5
3.1.	<b>Who Can File a Complaint?</b>	5
3.2.	<b>STEP 1. Receiving a Grievance/Complaint (g/c)</b>	5
3.3.	<b>Step 2. Registering and Acknowledging the Grievance/Complaint (G/C)</b>	9
3.4.	<b>Step 3. Forwarding the G/C</b>	10
3.5.	<b>Step 4. Updating the Complainants</b>	10
4.	The Problem Solving Process	11
4.1.	<b>Step 1. Determining eligibility</b>	11
4.2.	<b>Step 2. G/C assessment</b>	11
4.3.	<b>Step 3. Problem solving</b>	12
4.4.	<b>Step 4: Implementation and monitoring</b>	13
4.5.	<b>Step 5: Problem Solving Process End</b>	13
5.	The Compliance Review Process	14
5.1.	<b>Step 1. Scope Verification</b>	14
5.2.	<b>Step 2. DMA Verification</b>	14
5.3.	<b>Step 3. Determining eligibility.</b>	14
5.4.	<b>Step 4. TOR for the compliance review</b>	15
5.5.	<b>Step 5. Conducting the Compliance Review</b>	15
5.6.	<b>Step 6. Contents and submission of the Compliance Review Report</b>	15
5.7.	<b>Step 7. Communication of the Compliance Review Report</b>	16
5.8.	<b>Step 8. Contents of the Compliance Review decision</b>	16
5.9.	<b>Step 9. Disclosure of the Compliance Review decision.</b>	16
5.10.	<b>Step 10. Monitoring of Changes</b>	16
6.	CAF – GEF Projects Accountability Mechanism Flow Chart	18
6.1.	<b>Process for Receiving Complaints</b>	18
6.2.	<b>The Problem Solving Process</b>	18

6.3.	<b>The Compliance Review Process</b>	19
7.	<b>Annex 1: CAF – GEF Projects-Roles, Responsibilities and Accountability</b>	22
7.1.	<b>Roles</b>	22
7.2.	<b>Director DMA/DACC (D-DACC):</b>	23
7.3.	<b>CAF-GEF Project Coordinator (C-PCG)</b>	24
7.4.	<b>Team Leader CAF-GEF Project (L-EPCG)</b>	26
7.5.	<b>CAF-GEF Safeguard Internal Focal Point (PFI-CG) or Safeguard Responsible for the Project</b>	28
7.6.	<b>The CAF Ombudsperson</b>	29
8.	<b>Annex 2. CAF – GEF Projects: Project Monitoring and Supervision Processes and Tools</b>	30
8.1.	<b>CAF – GEF Projects: Monitoring and Supervision</b>	30
8.1.1.	<b>Overall Monitoring and Supervision Processes</b>	30
8.1.2.	<b>Response processes to documented non-compliance of commitments entered into vis-à-vis E&amp;S Safeguards applicable to a project</b>	31
8.1.3.	<b>Internal control processes in response to documented non-compliance of commitments entered into regarding management of A &amp; S safeguards applicable to a project</b>	33
8.2.	<b>Instruments for Planning and Monitoring Activities Along the Project Cycle</b>	35
8.2.1.	<b>Project Identification</b>	35
8.2.2.	<b>Project Concept</b>	35
8.2.3.	<b>Design and Project Preparation</b>	35
8.2.4.	<b>Project Implementation</b>	38

## 1. Introduction

1. CAF is about to finish an accreditation process as Implementing Agency of the Global Environment Facility (GEF). The main goal for CAF through this accreditation process and later in his act as accredited agency is, using its leadership and regional knowledge, to contribute to the development of the environmental and climate change sector of the countries, through the implementation of projects financed by the GEF.
2. Answering to the requirements for an Implementing Agency, CAF has developed a set of Environmental and Social Safeguards for CAF-GEF Projects, a Manual for CAF –GEF Projects that describes the framework for such Safeguards. Additionally CAF has developed an Operational Manual for the Environmental and Social Safeguards for CAF-GEF Projects Management.
3. On the other hand, to strengthen up transparency and institutional responsibility processes, and to foster greater public accountability, CAF has established the CAF-GEF Projects Accountability Mechanism to ensure enforcement of CAF's own environmental and social safeguard guidelines in projects in which CAF is acting as a GEF Partner Agency. This document is a complement of the Operational Manual for the Environmental and Social Safeguards for CAF-GEF Projects Management and has been written with the intention of describing the mentioned Accountability Mechanism.

### 1.1. Purpose

4. CAF-GEF Projects Accountability Mechanism has been established to assess and review complaints about CAF-GEF Projects. It provides people adversely affected by a CAF-GEF project an independent mechanism whereby requesting CAF to comply with all its CAF-GEF Environmental and Social Safeguards and Procedures.
5. The CAF-GEF Projects Accountability Mechanism shall be implemented whenever two or more affected persons consider that during the development of a CAF-GEF project, where CAF is acting as a GEF Implementing Agency, failures has been found to comply with any CAF-GEF Environmental and Social Safeguard and/or Procedure.

### 1.2. Functions

6. The function of the CAF-GEF Projects Accountability Mechanism is to perform problem-solving, and compliance review.
7. The compliance review function will be used to assess whether the activities and development of a CAF-GEF project comply with CAF-GEF Environmental and Social Safeguards and Procedures.
8. The problem-solving function will be carried out where problem-solving methods may contribute to resolve issues underlying the complaints or grievances. These methods might include independent fact-finding, mediation, conciliation, dialogue facilitation (taking into consideration best customary practices for handling complaints), investigation or reporting.
9. In assessing a complaint, there may be a recommendation for a compliance review or a problem-solving initiative, or both or neither.

### 1.3. Scope Limitations

10. The following matters are out of the scope and obligations of the CAF-GEF Projects Accountability Mechanism:

- (a) CAF-GEF Project administrative, procurement, fraud or corruption matters. This subjects are handled by a different area within CAF;
- (b) Judicial matters;
- (c) Non serious, malicious, or anonymous complaints;
- (d) G/C evidencing intention to gain competitive advantage;
- (e) Subjects over which the **CAF-GEF Projects Accountability Mechanism** has carry out up to a recommendation or decision after having dealt with it, unless justified admissible new evidence is presented or justifiable new circumstances are explained;
- (f) Actions that are the exclusive responsibility of others, including the Project proponent or Project Responsible part, and where no action or omission on the part of CAF is involved ;
- (g) The suitability or inappropriateness of **CAF-GEF Environmental and Social Safeguards and Procedures**; and
- (h) Supposed Human Rights violations, other than those involving social and economic rights claiming any action or omission on the part of the Bank Group.
- (i) G/C filed 12 or more months after the end of the CAF-GEF involved project.

## 2. Administrative Instances, CAF – GEF Projects: Roles, Responsibilities

### 2.1. Administrative Instances

11. Administrative instances, to receive, respond, and deal with grievances and complaints, are as follows:

- (a) The Ombudsperson (OP). CAF Corporate Comptroller shall be acting as the Ombudsperson, and shall be reporting to the Executive President.
- (b) The Grievance Management Committee (GMC). This Committee is made up by:
  - i. the Executive Vice-President, who presides;
  - ii. the Corporate Human Capital Director;
  - iii. the Legal Director;
  - iv. the Corporate Credit and Risk Director.
- (c) The Environmental Division Director (D-DMA, for its acronym in Spanish), upon an OP request shall provide technical support on matters related to Environmental and Social Safeguards and Procedures matters, designating a competent officer.
- (d) Technical support on environmental and social matters officer (TESO). A member of CAF-DACC staff which responsibilities are outside of the CAF-GEF Projects activities.
- (e) Problem Solving Facilitator (PSF): an external consultant appointed by the Grievance Management Committee (a Problem Solving Expert with recognized experience).
- (f) Compliance Review Expert (CRE): an external consultant appointed by the Grievance Management Committee (a Multilateral Organizations Policy and Safeguards Management Expert with recognized experience).
- (g) Policy and Safeguards Management Expert (PSME) an external consultant appointed by the Ombudsperson (OP) (a Multilateral Organizations Policy and Safeguards Management Expert with recognized experience and with experience in Accountability affairs).

12. Annual external audits shall be conducted to assess CAF compliance in terms of the environmental and social safeguard policies for CAF/GEF projects, and the Accountability Mechanism.

### 2.2. Roles and responsibilities

13. The Ombudsperson (OP). Responsibilities:

- (a) Has overall responsibility for the operation of the CAF-GEF Projects Accountability Mechanism.
- (b) Registers the Grievance/Complaint (G/C).
- (c) Determines whether an eligible complaint could benefit from a problem-solving initiative and or from a compliance review.
- (d) Ensures that time terms are met, or approves extensions.

- (e) Coordinates and delivers information and responses to all relevant parties at each process phase and step in the CAF-GEF Projects Accountability Mechanism.
14. The Grievance Management Committee (GMC). Responsibilities:
- (a) Carries out an initial assessment of the forwarded G/C and confirms whether it corresponds to the scope of the compliance review function.
  - (b) Reviews DMA Director's report relate to CAF-GEF Environmental and Social Safeguards and Procedures fulfillment or compliance failure.
  - (c) Decides the eligibility of the complaint, for the compliance review function and informs the OP, the Project Proponent/Implementer and CAF's DMA Director about the eligibility decision.
  - (d) Prepares the TORs for the compliance Review.
  - (e) Decides whether or not to accept the findings and recommendations presented in the Compliance Review Report.
  - (f) Communicates to the complainants, to OP and to any relevant party the Compliance Review Report and the decision about the Compliance Review Report's findings and recommendations.
  - (g) Reviews them monitoring reports of the implementation of the changes recommended in the Compliance Review Report (changes accepted by GMC).
  - (h) Supports OP in the operation of the CAF-GEF Projects Accountability Mechanism, in particular accompanying him/her while facing and solving unforeseen problems and situations.
15. The Compliance Review Expert (CRE). Responsibilities:
- (a) Conducts the compliance review.
  - (b) Prepares the Compliance Review Report for the Grievance Management Committee (GMC).
  - (c) Whether there has been a policy breach violation by CAF-GEF Project, he/she makes recommendations for remedial actions.
16. The Problem Solving Facilitator (PSF). Responsibilities:
- (a) Conducts the Problem Solving Process.
  - (b) Prepares the Compliance Review Report for Ombudsperson (OP).
  - (c) Includes in the Report an Implementation Plan to solve the problematic subjects, and a Monitoring Plan to be executed by the PSF.
  - (d) Whether there has been a policy breach violation by CAF-GEF Project, he/she makes recommendations for remedial actions.
17. The Environmental Division Director. Responsibilities (related to the CAF-GEF Projects Accountability Mechanism):
- (a) In case the Compliance Review Expert (CRE) asks GMC for Environmental and Social technical expert support, the Environmental Division Director designates a TESO (Technical support on environmental and social matters officer) to support the CRE.

- (b) Applies to DMA officials the corresponding provisions, measures and actions in relation to performance, monitoring, evaluation and compliance of commitments, processes, procedures and activities planned to ensure the proper management of CAF-GEF Environmental and Social safeguards. In this regard, DMA Director shall be consistent with the CAF Internal Control Policies for encouragement, evaluation and corrective actions against performance.

18. The OP and the Effect of a G/C on a CAF-GEF Project Operation.

- (a) The filing, registration, assessment or processing of a Complaint or the carrying out of a Compliance Review or Problem-solving Process shall not have the effect of automatically suspending the activities or disbursements related to the pertinent CAF-GEF Project.
- (b) If at any time during the processing of a G/C, the responsible(s) actor(s) or instance(s) consider(s) that serious, irreparable damage shall be caused by the continued development of the project, that/those actor(s) or instance(s) shall communicate the situation, as soon as possible to OP and may make a recommendation to suspend the project activities.
- (c) OP shall verify the CAF-GEF project contractual obligations and conditions and contractual applicable penalties and, in light of such contractual obligations, conditions and applicable penalties or other relevant CAF and CAF-GEF policies, shall decide his/her best recommendation to the relevant CAF officer or body assigned with the power to make that kind of decision. The recommendation may include, if applicable, the right to suspend or cancel in accordance with the contractual terms.
- (d) The former considerations may apply proportionally to less extreme circumstances, where the documented behavior of the Project Proponent/Developer or of its third parties (like contractors) may justify them.



### 3. Filing of a Grievance or Complaint (G/C)

#### 3.1. Who Can File a Complaint?

19. The OP shall receive G/C related to CAF-GEF Environmental and Social Safeguards and Procedures non-fulfillment from the following people or entities:

- (e) Any group of two or more people with a common interest, in the country or countries where the CAF-GEF project is located who has suffered or is likely to suffer direct damage because of a CAF-GEF project that is likely to be approved or that is under development.
- (f) A group's duly authorized representative can file the G/C.
- (g) A person who is not part of the affected group and are that is not locally based, can act as representative of the group only if that person provide evidence that there is no adequate or appropriate capability within the local community to file a complaint. If applicable, the person must be fluent in the native language of the group's members and be able to communicate effectively with the affected group.
- (h) CAF's Board of Directors.

#### 3.2. STEP 1. Receiving a Grievance/Complaint (g/c)

20. People or a group able to file a G/C and who believe they have been affected or may be affected by the adverse environmental and social impacts of a project in which CAF is acting as a GEF Agency shall consider:

- (a) The G/C may be related with any aspect dealing with the design, execution, result or impact of a project.
- (b) The G/C may be filed: by phone; via email, post or fax; or via web (c) The G/C may be submitted to the Ombudsperson in Caracas, and to the DMA official at CAF offices located in member countries, which shall convey them to the Ombudsperson.

21. Contact sites for submission of G/C are shown in Table below.

OFFICE	OMBUDSPERSON	CONTACT INFO
CAF'S HEADSQUARTER	CORPORATE CONTROLLER  (CONTRALOR CORPORATIVO)	Av. Luis Roche, Torre CAF, Altamira, Caracas - Venezuela
		Teléfono: (58 212) 2092111
		Fax: (58 212) 2092444
		Correo-e: <a href="mailto:infocaf@caf.com">infocaf@caf.com</a>
COUNTRY OFFICE	DACC'S REPRESENTATIVE	CONTACT INFO

	OFFICER	
ARGENTINA	José Agustín Blanco	Av. Eduardo Madero, No. 900 Av. 12 de Octubre N 24 - 562 y Cordero, Edificio Catalinas Plaza, Piso 15  C1106ACV, Ciudad de Buenos Aires  Buenos Aires, Argentina
		Tel: (54 11) 43186400
		Fax: (54 11) 4318 6401
		Email: <a href="mailto:argentina@caf.com">argentina@caf.com</a>
BOLIVIA	Edgar Salas	Av. Arce, No. 2915, Zona San Jorge, La Paz, Bolivia
		Tel: (591 2) 264-8111
		Fax: (591 2) 243-3304
		Email: <a href="mailto:bolivia@caf.com">bolivia@caf.com</a>
BRASIL	Sintia Yáñez	SAF/Sul, Quadra 2, Lote 4, Bloco D Edificio Vía Esplanada, Sala 404 CEP70070-600, Brasília-DF
		Tel: (55 61) 2191-8600
		Email: <a href="mailto:brasil@caf.com">brasil@caf.com</a>
COLOMBIA	Fanny Peña	Carrera 9 No. 76 - 49, Piso 7 Edificio ING, Bogotá Bogotá, Colombia
		Tel: (57 1) 744-9444
		Fax: (57 1) 313-2787 / 313-2721
		Email: <a href="mailto:colombia@caf.com">colombia@caf.com</a>

ECUADOR	Mauricio Velásquez	Av. 12 de Octubre N 24 - 562 y Cordero Edificio World Trade Center, Torre A, Piso 13. Quito, Ecuador
		Tel: (593 2) 398-8400
		Fax: (593 2) 222-2107
		Email: <a href="mailto:ecuador@caf.com">ecuador@caf.com</a>
ESPAÑA	Guillermo Fernández	Plaza Pablo Ruiz Picasso, No. 1, Torre Picasso Planta 24 CP28020, Madrid, España
		Tel: (34 91) 597-3894
		Fax: (34 91) 597-4927
		Email: <a href="mailto:españa@caf.com">españa@caf.com</a>
TRINIDAD TOBAGO	Y Iwan Sewberath	
PANAMÁ	Alfredo Paolillo	Bulevard Pacifica, PH Oceanía Business, Plaza Torre 200 Piso 27 Punta Pacifica, CP0832, Ciudad de Panamá
		Tel: (507) 297-5311
		Fax: (507) 297-5301
		Email: <a href="mailto:panamá@caf.com">panamá@caf.com</a>
PARAGUAY	Fernando Infante	Mariscal López 3794 y Cruz del Chaco Regus, Edificio Citicenter, Piso 4, CP1892, Asunción - Paraguay
		Tel: (595 21) 620-7718

		Fax: (595 21) 6207701
		Email: <a href="mailto:paraguay@caf.com">paraguay@caf.com</a>
PERÚ	René Gomez-García	Av. Enrique Canaval y Moreyra No. 380 Edificio Torre Siglo XXI, Piso 13 San Isidro, Lima 27 - Perú
		Tel: (511) 710-8511
		Fax: (511) 716-9885
		Email: <a href="mailto:peru@caf.com">peru@caf.com</a>
URUGUAY	Marco Giussani	Plaza Independencia 710 Torre Ejecutiva, Piso 9, CP11000 Montevideo – Uruguay
		Tel: (598 2) 917-8211
		Fax: (598 2) 917-8201
		Email: <a href="mailto:uruguay@caf.com">uruguay@caf.com</a>
VENEZUELA	Octavio Carrasquilla	Av. Luis Roche, Torre CAF, Altamira, Caracas - Venezuela
		Tel: (58 212) 2092111
		Fax: (58 212) 2092444
		Email: <a href="mailto:infocaf@caf.com">infocaf@caf.com</a>

22. The G/C could also be submitted by accessing CAF Website (<http://www.caf.com/es/sobre-caf/que-hacemos/acceso-a-la-informacion/proyectos-caf-gef/>) (<http://www.caf.com/en/about-caf/what-we-do/access-to-information/caf-gef-projects/>) as follows: on the “About CAF” icon, the name CAF/GEF PROJECT is displayed, and the “handling of Grievances and Complaints” link is shown including the Hotline and Whistle Blower Protection.

23. In remote areas, where access to telecommunication or electronic media is restricted, CAF, in coordination with the Project Proponent/Responsible, shall adopt effective alternative mechanisms to allowing people concerned to submit their G/C. Such effective alternative mechanisms shall also

consider adequate translation and written register in the event the native language of the Affected Group is different from Spanish, Portuguese or English.

24. While filing a G/C, the complainant shall include his/her contact information in order to make possible to contact him/her to answer the G/C.

25. Contents of a G/C. Any G/C should contain, to the extent possible, the following information:

- (a) A reference to the project, declaring all the pertinent facts, comprising the damage suffered by or threatened to the affected parties;
- (b) A brief description of how the parties have been or are likely to be materially and adversely affected by the CAF-GEF Project's act or omission and of the rights or interests of the parties that were directly affected;
- (c) In case of a compliance review request, an explanation of how CAF-GEF Projects Safeguards and Procedures were unfulfilled;
- (d) A reference to any previous communication (concerning the subjects referred to in the G/C) between the affected parties and the Project Proponent or Responsible, or CAF-GEF Accountability Mechanism administrative instances or Bank Group;
- (e) In case of a G/C related to subjects previously submitted to the CAF-GEF Accountability Mechanism, a description of any new evidence or circumstances that explain reconsidering the issue;
- (f) NOTE 1: All G/C must be submitted in writing, dated and signed by the Requestors and contain their names, contact addresses and an address to which correspondence shall be sent (if different from the Requestors' address).
- (g) NOTE 2: No specific format is necessary. In cases the G/C is presented orally, the responsible CAF officer will support Requestors in submitting it in writing.
- (h) NOTE 3: G/C shall be submitted in Spanish, Portuguese or English.

26. If some of the above information cannot be delivered, a clarification should be incorporated.

### **3.3. Step 2. Registering and Acknowledging the Grievance/Complaint (G/C)**

27. The G/C shall be considered received once is received by the OP. From this point, he has twenty (20) business days,

- (a) to carry out a preliminary review based on the information provided in the G/C,
- (b) to ask the complainants for additional information (if required),
- (c) to verify the complainants choice for problem solving or for compliance review,
- (d) and to determine if the G/C contains a valid claim resulting from a CAF-GEF Project.

28. Within the same term, the OP will register the G/C (in the CAF-GEF Accountability Mechanism's G/C register) and publish it on the CAF-GEF web sub-portal or he will declare the G/C outside CAF-GEF Accountability Mechanism's obligation. When the complainers are located in remote areas, where access to telecommunication or electronic media is restricted, or the native

language of the Affected Group is different from Spanish, Portuguese or English, the twenty (20) business days term shall be extended fifteen (15) more business days.

29. The OP may decline to register a G/C until enough and satisfactory information and documentation is filed. If, because OP's decision, the mentioned term (20, or 20+15, business days) is likely to be exceeded, the OP will communicate the circumstance and his decision to the complainants. This includes the explicit choice of the complainants for problem solving or for compliance review.

30. Outside CAF-GEF Accountability Mechanism scope. If the OP declare the G/C outside CAF-GEF Accountability Mechanism's scope and obligations, the OP will communicate the complainants his decision and the reasons of it. These reasons include, without limitation:

- (a) Matters detailed in the above CAF-GEF Accountability Mechanism Scope Limitations section.
- (b) G/C coming from a single individual.
- (c) G/C presented by a non-authorized representative of affected parties;
- (d) G/C being clearly non-serious, incongruous or anonymous.

#### **3.4. Step 3. Forwarding the G/C**

31. Step 3: Forwarding the G/C. Within a three (3) business days term after the publication of the G/C on the CAF-GEF web sub-portal, the OP forwards the complaint to:

- (a) the PSF (Problem Solving Facilitator) if the complainants meant a choice for problem solving, and the OP finds their choice reasonable; or
- (b) the CRE (Compliance Review Expert): CRE designated for the specific G/C process if the complainants meant a choice for compliance review, and the OP finds their choice reasonable; or
- (c) other appropriate CAF's areas, as applicable, if the nature of the G/C corresponds to the CAF-GEF Projects Accountability Mechanism Scope Limitations.

#### **3.5. Step 4. Updating the Complainants**

32. Step 4: Updating the complainants. Within a three (3) business days term after forwarding the G/C to the pertinent CAF area (PSF, TESO, other CAF area), the OP informs the complainants and/or their authorized representative(s) the CAF party that will continue as responsible of the G/C process and its contact information.

## 4. The Problem Solving Process

### 4.1. Step 1. Determining eligibility

33. Within a fifth teen (15) business days term, the PSF screens the forwarded G/C and its documentation, to decide its eligibility, considering the following aspects:

- (a) Any former action or good faith initiative aimed to solve the problems with the Project Proponent/implementer and or with CAF-DACC.
- (b) If no such action or initiative can be documented or proved, the PSF forwards the G/C and its documentation to CAF's DMA Director to ask for his/her opinion related to the solution perspectives.
- (c) With the support of CAF's DMA Director, PSF will verify relevant information from significant parties (Complainants, Project Proponent/implementer and his contractors, DMA).
- (d) NOTE: all the reasonable efforts shall be considered to preserve the requested confidentiality (if applicable).

34. Within the same fifth teen (15) business days term, the PSF will decide if his/her participation and also if the Problem Solving Process could be beneficial, in view of:

- (a) Whether the complainants and other interested groups are responsive to the problem-solving strategies;
- (b) Whether the problem-solving implementation is appropriate is likely to produce positive outcomes;
- (c) Whether the problem-solving implementation may help in addressing undesirable or, subsidiary effects caused by the CAF-GEF Project;
- (d) Whether CAF may have the necessary influence to induce change;
- (e) Whether the conduct of a problem-solving implementation may interfere with the compliance review, if any;
- (f) Any other relevant subjects.

35. PSF will report his/her decision on G/C eligibility to the OP, with a copy to the Grievance Management Committee (GMC), and will inform the complainants the result of his/her eligibility decision.

### 4.2. Step 2. G/C assessment

36. The PSF has a ninety (70) business days term to implement the G/C assessment and to report its results.

37. When the G/C has been declared eligible, the PSF verifies and evaluates the G/C documentation in order to:

- (a) figure out the development of the G/C;
- (b) confirm the interested parts;

- (c) make clear the variables of the problem and the clarify solution options;
- (d) identify the interested parts readiness to participate in the Problem Solving activities;
- (e) explore and propose solution options.

38. Other assessment activities the PSF may consider and implement:

- (a) Visits to site and to alleged affected areas or items;
- (b) Interviews and/or meetings with: complainants, the Project Proponent/Implementer, other actors;
- (c) Interviews with DMA personnel and review of documentation extra.
- (d) Fact-finding tasks.

39. PSF will report his/her G/C assessment results to the OP, with a copy to the Grievance Management Committee (GMC), specifying:

- (a) Whether he/she decides to continue the problem solving process, or
- (b) Whether he/she decides to stop and finish the problem solving process. In this event, he/she will explain and document, as possible, his/her decision.

40. PSF will inform the complainants the result and decision coming from the G/C assessment.

**4.3. Step 3. Problem solving**

41. When the PSF has decided to continue the problem solving process, he/she coordinates with the interested parties their involvement and participation in the specific solving problem activities chosen by him/her. These activities may include:

- (a) consultative dialogue,
- (b) information sharing,
- (c) fact-finding
- (d) a mediation mechanism,
- (e) other problem solving methods.

42. The remedial actions required to complete the Problem Solving shall be reflected in a written agreement or series of agreements among the parties. Actions affecting the CAF Project Development require written authorization from the leader of the CAF-GEF Project team, from the coordinator of CAF GEF Projects and written agreement by the Project Proponent/Implementer.

43. Once the problem solving process has been concluded (with or without any agreement), the PSF reports to the OP, with a copy to the GMC and to CAF DMA Director, the Complainants and the Project Proponent/Implementer. In case of no agreement, the problem solving process ends when finishing this problem-solving step.

44. PSF's report has to include a synthesis of the G/C and its processing, the decisions made and the agreements (if applicable) by the parties, an Implementation Plan to solve the problematic subjects, and a Monitoring Plan to be executed by the PSF (which time frame shall be proportional



to the Implementation Plan time frame). The Monitoring Plan will include a reporting schedule and shall be copied to OP, to the GMC, to CAF DMA Director, to the Complainants, to the Project Proponent/Implementer, and to other interested parts.

**4.4. Step 4: Implementation and monitoring**

45. The Implementation Plan is executed by the pertinent interested parts, while the Monitoring Plan and its reporting schedule is followed by the PSF.

**4.5. Step 5: Problem Solving Process End**

46. When the Implementation Plan and the Monitoring Plan have been completed, the PSF makes a final report and the SPF submits to the same Monitoring report distribution list.

## 5. The Compliance Review Process

### 5.1. Step 1. Scope Verification

47. The Grievance Management Committee (GMC) carries out an initial assessment of the forwarded G/C and confirms within a five (5) business days term of receiving it whether the G/C corresponds to the scope of the compliance review function. In case the G/C do not correspond to the scope of the compliance review function, the GMC reports its decision to the OP who will communicate the decision to the complainants and will stop the Compliance Review Process at this step.

### 5.2. Step 2. DMA Verification

48. After confirming the G/C corresponds to the scope of the compliance review function, the GMC will forward the complaint and its documentation to CAF's DMA Director and will asks him/her to report, within a fifteen (15) business days term:

- (a) evidence that DMA has fulfilled the applicable CAF-GEF Environmental and Social Safeguards and Procedures; or
- (b) acceptance that there have been failures in compliance with the applicable CAF-GEF Environmental and Social Safeguards and Procedures, presenting an Action Plan to prevent and ensure compliance to the extent possible. CAF'S DMA Director also present additional and pertinent information (if applicable).

If the complainants requested confidentiality, the GMC will take the necessary actions to protect it.

### 5.3. Step 3. Determining eligibility.

49. Within a fifteen (15) business days term, after receiving CAF's DMA Director's report, the GMC decides the eligibility of the complaint, verifying:

- (a) CAF's DMA Director's report
- (b) The G/C and its related documentation.
- (c) Whether there is evidence of noncompliance;
- (d) Whether there is evidence that the noncompliance has caused, or is likely to cause, direct and material harm to project-affected people;
- (e) Whether the noncompliance is serious enough to authorize a compliance review;
- (f) Whether the complainants implemented any former action or good faith initiative to resolve issues with the Project Proponent/Implementer and/or CAF's DMA.

50. The GMC informs the complainants, the OP, the Project Proponent/Implementer and CAF's DMA Director its decision regarding eligibility. If the G/C was not accepted for a Compliance Review, the OP will be the person who communicate the decision to the complainants and he/she will stop the Compliance Review Process at this step.

#### **5.4. Step 4. TOR for the compliance review**

51. After deciding, the eligibility of G/C, the GMC prepare the TOR (terms of Reference) for the compliance Review (which shall be specific for the considered situation) within a fifteen (15) business days term. The TOR will includes the scope, methodology, estimated review time frame, budget, list of the available information, the confidentiality requirements, the site visit requirements or recommendations.

#### **5.5. Step 5. Conducting the Compliance Review**

52. The **Compliance Review Expert** will conduct the Compliance Review in accordance with the TOR and within its time frame. The Compliance Review Expert will hall implement any appropriate and required activities, including:

- a. Request additional oral or written information from the Affected Group and any Relevant Party and or hold meetings with any of them;
- b. project site visits;
- c. prioritize the use of the technical expertise available at CAF, if necessary; If any Environmental and Social technical expertise is required, through the GMC, the RTE may ask the Environmental Division Director for technical support.
- d. any other activity required to complete the Compliance Review within the required time frame.

#### **5.6. Step 6. Contents and submission of the Compliance Review Report**

53. the Report shall:

- a. include a summary with the relevant facts, the positions of the interested parties with respect to the problematic subject of the G/C and the activities implemented during the Compliance Review;
- b. describe the findings of the Compliance Review which shall be limited to determining whether or not any CAF action, or failure to act, in respect of the related CAF –GEF Project have involved one or more breaches of CAF GEF Environmental and Social Safeguards and Procedures;
- c. In case the Compliance Review Report concludes that any CAF action, or failure to act, in respect of the related CAF –GEF Project have involved one or more breaches of CAF GEF Environmental and Social Safeguards and Procedures, recommend:
  - i. corrective modifications to processes or procedures within CAF’s DMA, or even within other identified CAF’s areas to prevent the repetition of similar circumstances;
  - ii. Measures to monitor the implementation of the changes mentioned above, and the recommended person to be responsible of such monitoring.
- d. Include copies of the original Complaint and of the responses of the relevant CAF’s areas.

- e. Include a list of supporting documentation of the investigation.

54. No award of compensation. The Compliance Review Report may not recommend the award of compensation or any other benefits to Affected Groups, with the exception of what is expressly considered in a relevant CAF-GEF Environmental and Social Safeguard or Procedure.

55. Impartiality of the Compliance Review Report. Prior to submitting the Report to the Grievance Management Committee (GMC), the CRE shall verify that all the information relating to the Affected Group or any Relevant Party has been verified with such party. Recommendations and findings of a Compliance Review Report shall be related only to the information pertinent to the referred G/C and shall be rigorously impartial.

56. Submission of the Compliance Review Report. The Compliance Review Report shall be submitted by the Compliance Review Expert for consideration and decision to the Grievance Management Committee (GMC), with a copy to the OP.

#### **5.7. Step 7. Communication of the Compliance Review Report**

57. In consideration of the provisions of CAF's Public Involvement Policy, the Compliance Review Report shall be communicated to the complainants and any Relevant Party at the same time as it is submitted for consideration and decision to the GMC.

#### **5.8. Step 8. Contents of the Compliance Review decision**

Within a fifteen (15) business days term after receiving the Report, the Grievance Management Committee (GMC), shall decide whether or not to accept the findings and recommendations presented in the Compliance Review Report. Any decision made by GMC President shall be immediately copied to the OP.

#### **5.9. Step 9. Disclosure of the Compliance Review decision.**

58. In consideration of the provisions of CAF's Public Involvement Policy, the decision made by the GMC shall be quickly communicated to the Affected Group and any Relevant Party. Subject to the same provisions, the decision and the Compliance Review Report shall be published on the CAF-GEF web sub-portal.

#### **5.10. Step 10. Monitoring of Changes**

59. The person in charge of monitoring the implementation of the changes recommended in the Compliance Review Report, and that were accepted by the GMC, shall report on such implementation to the GMC and to OP, at least once a year.



## 6. CAF – GEF Projects Accountability Mechanism Flow Chart

### 6.1. Process for Receiving Complaints

<p>Within 20 business days of receiving the G/C (35 business days in special cases)</p>	<p><b>Step 1. Receiving the complaint</b></p> <ul style="list-style-type: none"> <li>The complaint is filed with the OP.</li> </ul> <p>Notes:</p> <p>i. Complaints received by other CAF offices or areas should be forwarded to the OP.</p>
<p>Within 20 business days of receiving the G/C (35 business days in special cases)</p>	<p><b>Step 2. Registering and acknowledging the G/C</b></p> <ul style="list-style-type: none"> <li>The OP acknowledges the complainants the receipt of G/C.</li> <li>The OP verifies the information and the complainants' choice (problem solving or compliance review).</li> <li>The OP registers the complaint on the CAF-GEF web sub-portal.</li> <li>The OP may decline the G/C until enough information and documentation is filed.</li> </ul> <p>NOTES:</p> <p>i. The OP ensures the confidentiality of complainants' identities if requested.</p>
<p>3 business days after the publication of the G/C on the CAF-GEF web sub-portal</p>	<p><b>Step 3. Forwarding the G/C</b></p> <ul style="list-style-type: none"> <li>The OP forwards the complaint to: <ul style="list-style-type: none"> <li>(i) the PSF, or</li> <li>(ii) the TESO designated for the G/C process, or</li> <li>(iii) other appropriate CAF areas departments or offices (if the nature of the G/C matches the Scope Limitations).</li> </ul> </li> </ul>
<p>(3) business days term after forwarding the G/C</p>	<p><b>Step 4. Updating the complainants</b></p> <ul style="list-style-type: none"> <li>The OP informs the complainants the CAF area that will continue with the G/C process and its contact information.</li> </ul>

### 6.2. The Problem Solving Process

<p>15 business days</p>	<p><b>Step 1. Determining eligibility</b></p> <ul style="list-style-type: none"> <li>the PSF screens the G/C and its documentation, to decide its eligibility.</li> <li>The PSF will decide if his/her participation and if the Problem Solving Process could be beneficial.</li> <li>The PSF will report his/her decision on G/C eligibility to</li> </ul>
-------------------------	---

	<p>the OP.</p> <ul style="list-style-type: none"> <li>• The PSF will inform the complainants the result of his/her eligibility decision.</li> </ul>
15 business days	<p><b>Step 2. G/C assessment</b></p> <ul style="list-style-type: none"> <li>• The PSF verifies and evaluates the G/C documentation</li> <li>• The PSF implement complementary activities: visits; interviews; fact-finding tasks.</li> <li>• PSF reports the assessment results to the OP/GMC, specifying whether the problem solving process continues or finishes.</li> <li>• The PSF will inform the complainants the result of the G/C assessment.</li> </ul>
Time required depends on specific conditions, context, nature and complexity of the problems.	<p><b>Step 3. Problem solving</b></p> <ul style="list-style-type: none"> <li>• The PSF coordinates with the interested parties their participation in the problem solving activities:             <ol style="list-style-type: none"> <li>(a) consultative dialogue,</li> <li>(b) information sharing,</li> <li>(c) fact-finding</li> <li>(d) a mediation mechanism,</li> <li>(e) other problem solving methods.</li> </ol> </li> <li>• The PSF and the interested parties agree on remedial actions.</li> <li>• The PSF presents the Problem Solving report to the OP, with a copy to the GMC and to CAF DMA Director, the Complainants and the Project Proponent/Implementer. If no agreement is reached, the problem solving process ends.</li> </ul>
Time required depends on specific conditions of the Plan and of the Project	<p><b>Step 4. Implementation and monitoring</b></p> <ul style="list-style-type: none"> <li>• The Implementation Plan is executed by the pertinent interested parts, while the Monitoring Plan and its reporting schedule is followed by the PSF.</li> </ul>
	<p><b>Step 5. Problem Solving Process End.</b> When the Implementation Plan and the Monitoring Plan have been completed, the PSF makes a final report and the SPF submits to the same Monitoring report distribution list.</p>

### 6.3. The Compliance Review Process

5 business days term after receiving the G/C	<p><b>Step 1. Scope Verification</b></p> <ul style="list-style-type: none"> <li>• The Grievance Management Committee (GMC) verifies the scope of the compliance review function.</li> </ul>
--	---

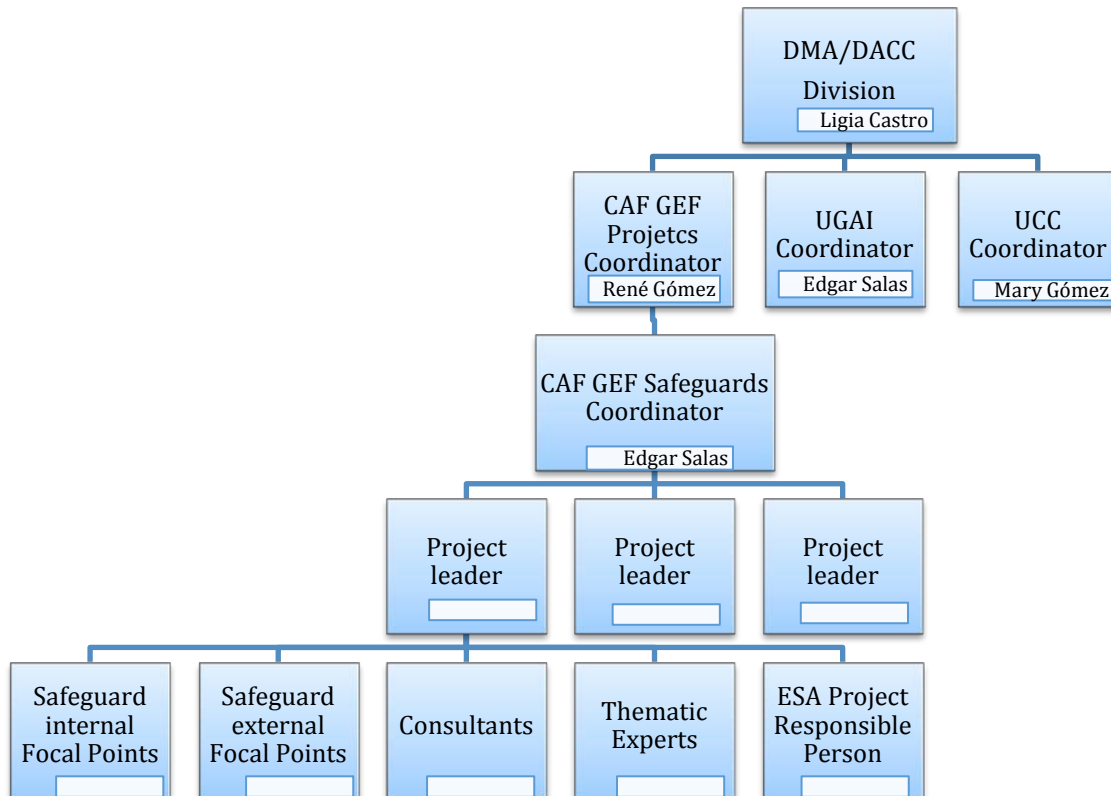
<p>15 business days term</p>	<p><b>Step 2. DMA Verification</b></p> <ul style="list-style-type: none"> <li>• CAF’s DMA Director report:             <ul style="list-style-type: none"> <li>• evidence that DMA has fulfilled the applicable CAF-GEF Environmental and Social Safeguards and Procedures; or</li> <li>• acceptance that there have been failures in compliance with the applicable CAF-GEF Environmental and Social Safeguards and Procedures.</li> </ul> </li> </ul>
<p>15 business days term</p>	<p><b>Step 3. Determining eligibility</b></p> <ul style="list-style-type: none"> <li>• The GMC decides the eligibility of the complaint, verifying:             <ul style="list-style-type: none"> <li>• CAF’s DMA Director’s report</li> <li>• The G/C and its related documentation.</li> <li>• Whether there is evidence of noncompliance;</li> <li>• Whether there is evidence that the noncompliance has caused, or is likely to cause, direct and material harm to project-affected people;</li> <li>• Whether the noncompliance is serious enough to authorize a compliance review;</li> <li>• Whether the complainants implemented any former action or good faith initiative to resolve issues with the Project Proponent/Implementer and/or CAF’s DMA.</li> </ul> </li> </ul>
<p>15 business days term</p>	<p><b>Step 4. TOR for the Compliance review</b></p> <ul style="list-style-type: none"> <li>• The GMC prepare the TOR (terms of Reference) for the compliance Review:             <ul style="list-style-type: none"> <li>• scope,</li> <li>• methodology,</li> <li>• estimated review time frame,</li> <li>• budget,</li> <li>• list of the available information,</li> <li>• confidentiality requirements,</li> <li>• the site visit requirements or recommendations.</li> </ul> </li> </ul>
<p>Time required depends on conditions, context, nature and complexity of the Project and assumed noncompliance.</p>	<p><b>Step 5. Conducting compliance review</b></p> <p>The CRE may / implement:</p> <ul style="list-style-type: none"> <li>• Request additional oral or written information from the Affected Group and any Relevant Party and or hold meetings with any of them;</li> <li>• project site visits;</li> <li>• prioritize the use of the technical expertise available at CAF, if necessary;</li> <li>• any other activity required to complete the Compliance Review within the required time frame.</li> </ul>
	<p><b>Step 6. Contents and submission of the Compliance Review Report</b></p> <ul style="list-style-type: none"> <li>• Summary of the Compliance Review Process</li> <li>• Findings of the Process</li> <li>• In case of Safeguards breaches, recommended corrective modifications and measures to monitor the changes.</li> <li>• Report documentation</li> </ul>



	<ul style="list-style-type: none"> <li>• Compensation limited to CAF-GEF E&amp;S Safeguards and Procedures</li> <li>• Impartiality of the Report</li> <li>• Report submission to GMC and OP.</li> <li>• CRP issues a draft report of its findings to the complainants, borrower, and Management for comments and responses.</li> <li>• The Compliance Review Report is submitted by the CRE for consideration and decision to the (GMC), with a copy to the OP.</li> </ul>
	<p><b>Step 7. Communication of Compliance Review Report</b></p> <ul style="list-style-type: none"> <li>• The Compliance Review Report shall be communicated to the complainants and any Relevant Party at the same time as it is submitted for consideration and decision to the GMC.</li> </ul>
15 business days term	<p><b>Step 8. Contents of the Compliance Review Report decision</b></p> <ul style="list-style-type: none"> <li>• The Grievance Management Committee (GMC), shall decide whether or not to accept the findings and recommendations presented in the Compliance Review Report.</li> <li>• Any decision made by GMC President shall be immediately copied to the OP.</li> </ul>
	<p><b>Step 9. Disclosure of the Compliance Review Report decision</b></p> <ul style="list-style-type: none"> <li>• The decision made by the GMC shall be quickly communicated to the Affected Group and any Relevant Party.</li> <li>• The decision and the Compliance Review Report shall be published on the CAF-GEF web sub-portal.</li> </ul>
Time required depends on specific nature of the changes	<p><b>Step 10. Monitoring of changes</b></p> <ul style="list-style-type: none"> <li>• Monitoring of the implementation of the changes recommended in the Compliance Review Report, and that were accepted by the GMC,</li> <li>• Report on such implementation to the GMC and to OP, at least once a year.</li> </ul>

## 7. Annex 1: CAF – GEF Projects-Roles, Responsibilities and Accountability

### 7.1. Roles



**Figure 1: Environmental and Social Safeguards Management Reporting lines Organization Chart**

Acronym	Description	Acronym	Description
DMA /DACC	Environmental Division /Environmental and Climate Change Division	IAS	Environmental and Social Report
EIAS	Environmental and Social Impact Assessment	TDR	Terms of reference
D-DACC	Environmental Division /Environmental and Climate Change Division Director	C-PCG	CAF-GEF Projects Coordinator

UGAI	Institutional Environmental Management Unit	C-UGAI	Institutional Environmental Management Unit Coordinator
UNV	Green Business Unit	C-UNV	Green Business Unit Coordinator
UCC	Climate Change Unit	C-UCC	Climate Change Unit Coordinatdor
EPCG	CAF-GEF Project Team	PP	Project Proponent / Implementer
L-EPCG	CAF-GEF Project Team Leader	CSAS-CG	CAF-GEF Environmental and Social Safeguards Coordinator
PFI-CG	CAF-GEF Internal Focal Point	EjeP	Country Officer
PFE-CG	CAF-GEF External Focal Point		

## 7.2. Director DMA/DACC (D-DACC):

The D-DACC is responsible for:

- i. Approving the Operating Manual revisions, updates and modifications.
- ii. Assessing DACC competencies related to understanding and management skills on: 1. CAF-GEF Environmental and Social Safeguards; 2. The RBM and the Logical Framework Approach; 2. Adequate competences to be CAF-GEF Project Team Leader.
- iii. With respect to the above mentioned competences, planning and implementing the activities, related to the necessary induction, training, updating and information to ensure that such skills are maintained adequate and updated.
- iv. In coordination with the CAF-GEF Projects Coordinator (C-PCG) designating, for each project that starts the stage of Project Concept document (PIF) preparation, a competent CAF-GEF Project Team Leader.

The D-DACC must be held accountable for:

- i. Designating, for each CAF-GEF Project, the Technical Human Resource (internal or external) that is necessary and appropriate to ensure the satisfactory performance of CAF in their responsibility to warrant compliance with the provisions of CAF-GEF Environmental and Social Safeguards applicable to each CAF-GEF Project.
- ii. Applies to DMA officials the corresponding provisions, measures and actions in relation to performance, monitoring, evaluation and compliance of commitments, processes, procedures and activities planned to ensure the proper management of CAF-GEF Environmental and Social safeguards. In this regard, DMA Director shall be consistent with

the CAF Internal Control Policies for encouragement, evaluation and corrective actions against performance.

### **7.3. CAF-GEF Project Coordinator (C-PCG)**

The C-PCG is responsible for:

- i. Running the Coordination of CAF-GEF Projects and update its strategic guidelines.
- ii. In matters related to the management of CAF-GEF projects technical activities, representing CAF before the GEF Secretariat.
- iii. Obtaining approval from the DACC/DMA Director for updates of the CAF-GEF Environmental and Social Safeguards Management Operating Manual.
- iv. Reviewing, updating, and distributing, within DACC/DMA, the CAF-GEF Environmental and Social Safeguards Management Operating Manual.
- v. Monitor the activities and responsibilities of the CAF-GEF Project Team Leaders on the development of projects in the GEF approval cycle and in the stages of formalization and implementation and in the activities of monitoring, evaluation, and final evaluation.
- vi. Updating and developing the CAF-GEF website on the CAF web, make a timely request and authorization of appropriate technological support.
- vii. Preparing for each project the Annual Plan of Reporting before GEF, keeping it updated, notifying each L-EPCG on their updates, monitoring its implementation and, if necessary, agreeing and coordinating corrective actions with each L-EPCG.
- viii. NOTE: at the start of the CAF-GEF activities, the CAF-GEF Projects Coordinator can fulfill the tasks of Project Team Leader up when the management demand requires the designation of one or more different Project Leader (s).
- ix. Updating the content of the various Annexes of the Operating Manual, especially in consideration of the information updates from the GEF website (<http://www.thegef.org>) and additional guidelines and requirements of the GEF National Operational Focal Point (if applicable).
- x. Coordinating with C- UGAI and D-DACC, to provide timely the professional human resource support (internal and external) required for each CAF-GEF Project Team Leader (L-EPCG) at the different stages of project development.
- xi. Review, verify the consistency of all documentation for the management of CAF-GEF projects, reporting to D-DACC improvement opportunities and propose plans and alternatives to implement the improvements and to implement them once formally adopted by D-DACC .

The C-PCG must be held accountable for:

- i. The performance of each project in relation to the commitments and responsibilities relating to GEF approval cycle, the planned development of the project and the achievement of its objectives.

### **7.4. CAF-GEF Environmental and Social Safeguards Coordinator (CSAS-CG)**

The CSAS-CG is responsible for:

- i. Verifying that each project leader assigned to a CAF GEF Project:
    - o At the beginning of the Project Concept document (PIF) preparation stage, coordinates timely with the Project Proponent the processing of the "Questionnaire for the Preliminary Verification of aspects and topics of environmental and social safeguards applicable to the Project."
    - o At the beginning of the the Project Concept document (PIF) preparation stage, timely deliveries to the Project Proponent the Safeguards documents applicable to the project, its Annexes, the version for the Proponent of the Project Operating Manual, the sector guidelines applicable to the project.
    - o Timely Coordinates with the Project Proponent, for each stage of the project cycle, (Preparation of Project Concept, PIF, Preparation of Project Approval Document, PAD; Implementation Project) prepares an agenda of activities related to the management of CAF GEF Environmental and Social Safeguards applicable to the Project.
  - ii. For each project and at each stage of the project cycle (Preparation of Project Concept, PIF; Preparation of Project Approval Document, PAD, Project Implementation) verifying the consistency of the agenda of activities related to the management of CAF-GEF Environmental and Social safeguards applicable to the Project (agenda prepared by the respective Project Leader in coordination with the Project Proponent).
  - iii. In each CAF-GEF Project, throughout the project cycle, from the beginning of the preparation of the Project Concept Paper, verifying that each CAF-GEF Project team has assigned and authorized the support of the internal and external focal points and of the necessary DACC staff that is appropriate for the management of the CAF-GEF safeguards applicable to the Project. Reporting with priority to C-PCG any inconvenience in this respect. In the absence or limitation of C-PCG, reporting to D-DACC.
  - iv. Monitoring the activities and responsibilities of the CAF-GEF Project Team Leaders related to Safeguards management.
  - v. Coordinating with the Office of Communications of CAF the publication in the CAF-GEF sub-Portal Web at each Project stage, and throughout the project cycle, of the information corresponding to information disclosure processes, consultation and participation of each project.
  - vi. Reporting to C-PCG, D-DACC and CAF Ombudsperson about defaults and risk situations regarding performance against the CAF-GEF Environmental and Social Safeguards in the development of any CAF-GEF project.
  - vii. Semi-annual reporting to D-DACC, justifiably, about needs and training options, awareness and update on CAF-GEF Environmental and Social Safeguards.
  - viii. Developing appropriate management tools for optimal performance of L-EPCGs and EPCG in control and assurance of performance against the CAF-GEF Environmental and Social Safeguards (checklists, reporting formats, control documents formats, formats for management control) and training (in coordination with C-PCG and D-DACC) to L-EPCG and EPCG in use.
  - ix. Developing a master list of documents for the management of CAF-GEF Environmental and Social Safeguards, updating and performing and controlling the distribution of documents and updates, reporting to C-UGAI, C-PCG and D-Projects DACC about the updates.
  - x. Via E-mail, keeping updated E-PCG about alerts, lessons learned, updates, modifications, training, resources and other news and information related to the management of CAF-GEF Project Environmental and Social Safeguards.
-

- xi. Keeping track of D-DACC internal communications, the memories of training in the management of Environmental and Social Safeguards for CAF-GEF Projects.
- xii. Reporting to C-PCG and D-DACC, propose the response to requests for information received (when they are related to the environmental and social performance of the Project).
- xiii. Perform and / or coordinate an internal audit of CAF-GEF Environmental Management and Social Safeguards at each CAF-GEF active project and at phase greater than or equal to project design and preparation, reporting the results (with a copy to the corresponding L-EPCG) to C-PCG, D-CAF, to DACC and the Ombudsperson with a copy of the executive summary PP.

The CSAS-CG must be held accountable for:

- i. The performance of each project in relation to the commitments and responsibilities relating to CAF-GEF Environmental and Social Safeguards.

#### **7.4. Team Leader CAF-GEF Project (L-EPCG)**

The L-EPCG is responsible for:

- i. In terms of technical development of the project throughout the cycle of CAF-GEF Project, coordinating with the Project Proponent proper preparation and implementation of different activities, documents, evaluations, filling out questionnaires, plannings, calendars, reports required for: 1. the full development of the project and 2. The fulfillment of all the commitments made in the CAF-GEF Environmental and Social Safeguards.
- ii. At the beginning of the document preparation stage Project Concept (PIF), timely coordinate with the Project Proponent the processing of the "Preliminary Questionnaire Verification Aspects and topics of environmental and social safeguards applicable to the Project."
- iii. At the beginning of the preparation stage of the Project Concept document (PIF), timely deliver to the Project Proponent the safeguard documents applicable to the project, its Annexes, the version for the Proponent Project of the Operating Manual, the sectoral guidelines applicable to the project.
- iv. Timely coordinating with the Project Proponent, for each stage of the project cycle (Preparation of Project Concept, PIF, Preparation of Project Approval Document, PAD; Implementation Project) the development of an agenda of activities related to the management of CAF GEF Environmental and Social Safeguards applicable to the Project.
- v. Timely coordinate with each professional (internal or external) assigned to the project, for each stage of the project cycle (Preparation of Project Concept, PIF, Preparation of Project Approval Document, PAD, Project Implementation) the development of an agenda of activities related to the management of environmental and social safeguards applicable to CAF GEF Projects and monitoring the timely and proper execution of the planned agenda. In case of amendments, uncertainties or failures agreeing with the responsible Corrective Action Plan and conduct follow this plan, reporting to C-PCG-CG and CSAS.
- vi. For each stage of the project cycle (Preparation of Project Concept, PIF, Preparation of Project Approval Document, PAD, Project Implementation) tracking the development and implementation of the agenda of activities related to the management of CAF-GEF environmental and Social safeguards applicable to the Project. In case of amendments,

- breach or other, agreeing with the respective Project Proponent Corrective Action Plan, to follow up on the plan and report the news, the Plan and monitor C-PCG-CG and CSAS.
- vii. For each stage of the project cycle (Preparation of Project Concept, PIF, Preparation of Project Approval Document, PAD, Project Implementation) developing a RACI matrix (Responsible, Accountable, Consulted, Informed) for all activities included in the schedule of activities related to the management of CAF GEF environmental and social safeguards applicable to Project. Confirming and validating the Matrix with his/her project team and distribute the version validated and reviewed by the CSAS-CG. In turn, coordinating with the Project Proponent the development of another RACI matrix for the activities scheduled under its responsibility, as well as a strategy for its the documented monitoring.
  - viii. Agreeing with the Project Proponent the preparation of a document describing roles, responsibilities and accountability applicable for his team (including consultants). In case of default or inadequate performance on CAF-GEF environmental and social safeguards, the PP should document the implementation of its response principles to problems of performance expected in his document.
  - ix. Present to CSAS-CG a quarterly, synthetic and documented report on the development of the agenda of activities related to the management of CAF GEF Environmental and Social Safeguards applicable to Project. This report will be based on the respective quarterly report of compliance with CAF-GEF environmental safeguards to be prepared and submitted by the Project Proponent. This document must be satisfactorily prepare and documented to provide evidence of the successful implementation of planned activities (including Corrective Action Plans). In case of difficulty, risk or significant uncertainty reporting to C-PCG and CSAS-CG and eventually agreed with them and the project proponent a visit to the Project or a verification by a third party.
  - x. During the stage of formalization of the project, verifying that the conditions or clauses for the assurance of the considerations described in this document and applicable to the Project Proponent will be included in the agreement or contract for the Project to be established between CAF and the Project Proponent.
  - xi. At each stage of the project, and throughout the project cycle, preparing adequate and updated information on the project, to feed the CAF-GEF web sub-site with information corresponding to the processes of information disclosure, consultation and participation of the project under his/her responsibility. Providing this information to C-PCG, monitoring the updating and relevance of the information published on the sub-portal and report C-PCG and CSAS-CG about any novelty, inconvenience or irregularity in this regard. For special conditions of disclosure, verify and document compliance with the requirements of the CAF-GEF Environmental and Social Safeguards.
  - xii. Verifying compliance with the requirements of the CAF-GEF Public Involvement Policy by the Proposer / Project Implementer.
  - xiii. Providing CAF Directorate of Special Funds, DAFE, the support and information necessary for the proper implementation of the CAF-GEF Trust Standard for the project and coordinating with the members of the E-PCG the necessary activities for the same purpose.
  - xiv. Check that his/her project team has received the minimum appointment of the following personnel (in case of difficulty, to report C-PCG, a CSAS-CG and D-DACC):
    - o A competent professional to lead, support or regulate (depending on the capacity of the project proponent) the Project Logical Framework design process up to their products (Logical Framework Matrix, Program Evaluation and monitoring).

- Responsible for Environmental and Social Assessment.
- An internal thematic expert (depending on the nature of the project: renewable energy, climate change, etc.). This person initially will be responsible the corresponding internal thematic expert and, as required, will be the link with the external focal point and with additional consultants. In the absence of internal thematic expert, the external thematic expert will be part of the project team from the beginning.
- A consultant on Gender Issues. This one initially will be responsible the corresponding internal focal point and, as required, the link with the external focal point and with additional consultants.
- A responsible for each applicable safeguards (in addition to Environmental and Social Evaluation and Gender Affairs). This one initially will be the corresponding responsible internal focal point and, as required, the link with the external focal point and with additional consultants.
- Preferably, the responsible of generating the project idea or other DACC professional (generally the Country Executive) will act as link to the Bidder / implementer of the Project and as local support in stages of the project later than the development of the Project Idea.

The L-EPCG must be held accountable for:

- i. Planning with the Project Proponent the implementation and timely and appropriate documentation, by this one, of all the planned activities under 1. the respective activities agenda related with the management of CAF GEF Environmental and Social Safeguards applicable to Project or 2. Corrective Action Plans.
- ii. The inclusion in the agreement or contract of the project (to be established between CAF and the Project Proponent) of the conditions or clauses to ensure the fulfillment of the provisions described in this document and applicable to the project proponent.
- iii. Proper compliance with the disclosure requirements and obligations of the Project.

### **7.5. CAF-GEF Safeguard Internal Focal Point (PFI-CG) or Safeguard Responsible for the Project**

The PFI-CG is responsible for:

- i. In terms of technical development of the project throughout the cycle of CAF-GEF Project, coordinating with the Project Proponent the proper preparation and implementation of the different activities, documents, evaluations, questionnaires filling out, planning, calendars, reports required for: 1. the full development of the project and 2. The fulfillment of all the commitments made in the CAF-GEF Environmental and Social Safeguards.

The PFI-CG must be held accountable for:

- i. Proper and timely implementation of activities under its responsibility in the project, including coordinating activities with the external focal point, if any assigned to the Project, in relation



to the commitments and responsibilities relating to CAF-GEF Environmental and Social Safeguards.

#### **7.6. The CAF Ombudsperson**

The Ombudsperson CAF is responsible for:

- i. External communications and record nonconformities received from interested parties as well as their treatment and resolution.
- ii. Develop a research report about environmental complaints received, at the request of the C-PCG and / or D-DACC.

The Ombudsperson must be held accountable for:

- i. Transparent and consistent management of the accountability Complaints and grievance system for CAF-GEF Projects

#### **7.8. The project proponent (PP)**

The PP is responsible for:

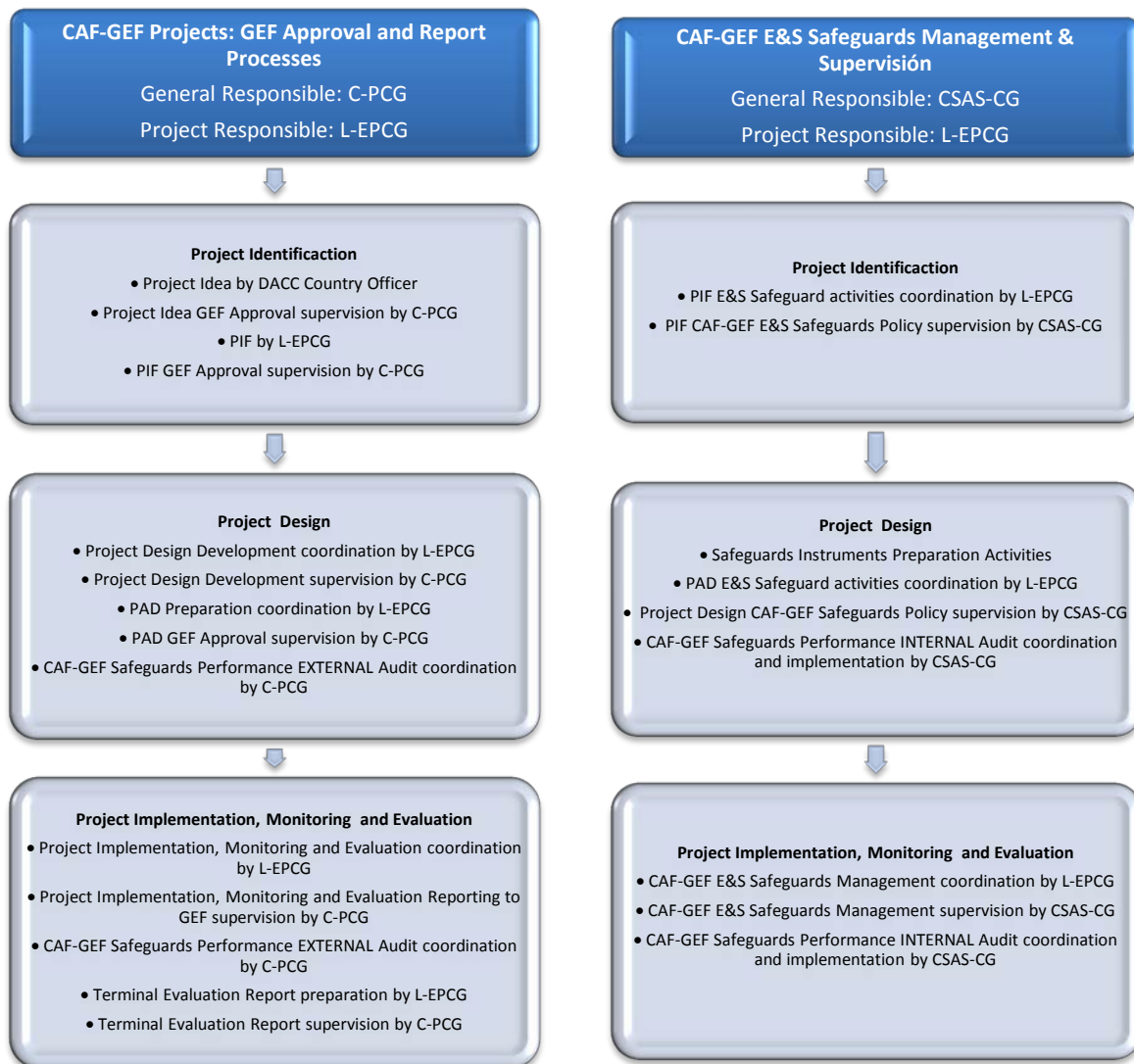
- i. The implementation of the activities or preparation, project implementation, including the agreed monitoring activities, monitoring and evaluation.

## 8. Annex 2. CAF – GEF Projects: Project Monitoring and Supervision Processes and Tools

### 8.1. CAF – GEF Projects: Monitoring and Supervision

#### 8.1.1. Overall Monitoring and Supervision Processes

- i. Monitoring, regulation and supervision over the execution and the environmental performance of a CAF-GEF Project is the responsibility of the CAF – GEF Project Team, C-PCG, and CSAS-CG. The Project Team activities are set forth in line with the different CAF-GEF Project cycle stages.
- ii. The CAF – GEF Project responsibilities vis-à-vis monitoring, regulation and supervision are split up into two components: 1. Project approval process by the different GEF entities, and reports being conveyed to GEF, monitored in all projects by C-PCG, who is accountable for it. 2. The regulation and control management of the environmental and social performance of the Project vis-à-vis CAF-GEF E&S Safeguards, supervised, in all projects by CSAS-CG, who reports about it.
- iii. Considering assignment of responsibilities and aspects for which accountability is required as set forth Chapter 2 of this document (2. CAF-GEF Projects: Roles, Responsibilities and Accountability), chart below shows the two sequences of the Overall Monitoring and Supervision Processes.
- iv. Chapter 3 of this document describes the planning and supervision instruments of activities throughout the project cycle, as spelled out in the project cycle stages sequence.
- v. Chapter 4 of this document describes procedures as applicable for monitoring and ensuring compliance with Environmental and Social Policy and Safeguards at each stage of the project cycle.



CAF – GEF Projects: project monitoring and supervision and people responsible for them

### 8.1.2. Response processes to documented non-compliance of commitments entered into vis-à-vis E&S Safeguards applicable to a project

- i. In the event that a EPCG member is aware of and document a non-compliance of commitments made regarding the E&S Safeguards management pursuant to a project, he / she should report writing, via e-mail (including documentary evidence) to L-EPCG, C-PCG-CG and CSAS.
- ii. Together, L-EPCG, C-PCG and CSAS-CG shall look into the non-compliance situation and documentary evidence, and shall rate the non-compliance in line with the following classification, issuing a technical memorandum with the analysis findings and rating:

- a) Unprecedented non-compliance and without giving rise to environmental or social impact situations, or significant environmental or social threat instances (the significant rating is based on the professional judgment of L-EPCG, a C-PCG and CSAS-CG and should be substantiated by competent professional argument).
  - b) Precedent non-compliance generating environmental or social impact situations, or significant environmental or social threat situations (the significant rating is based on the professional judgment of L-EPCG, a C-PCG and CSAS-CG and should be substantiated by competent professional argument).
  - c) Unprecedented non-compliance generating environmental or social impact situations, or significant environmental or social threat situations (the significant rating is based on the professional judgment of L-EPCG, a C-PCG and CSAS-CG, and should be substantiated by competent professional argument).
  - d) Precedent non-compliance generating with environmental or social impact situation, or significant environmental or social threat situations (the significant rating is based on the professional judgment of L-EPCG, a C-PCG and CSAS-CG, and should be substantiated by competent professional argument).
  - e) NOTE: 1 In case documentary evidence is found that that the non-compliance is being originated by an error or approach: 1. Of the previous joint planning being developed between PP and L-EPCG. 2. Of requirements or communications being originated by EPCG members, a deadline shall be set forth as described below under iv.a), not including non-compliance as a precedent for an eventual default in the future. D-DACC shall apply internal control principles described in iv.a) to the EPCG member responsible for the error, approach, requirement or communication to which the non-compliance may be attributable
- iii. C-PCG shall report to D-DACC, to CAF Ombudsperson on the non-compliance situation identified, attaching supporting documentation and technical memorandum including analysis and rating results as mentioned.
- iv. The CAF Ombudsperson shall report PP via email on the non-compliance situation identified, attaching supporting documentation and a technical memorandum including analysis and rating results as mentioned, and explaining implications, including:
- a) The allocation of a deadline to addressing the non-compliance. This deadline may not exceed the time being set forth in project planning to complete activities allowing for proper compliance. In the event that the established project planning does not allow compliance of a deadline, the CAF Ombudsperson shall allocate a deadline supported on a professional opinion by the DACC team, or by an external consultant in the event that the relevant competence required is not available in the DACC team.

- b) The submission of reasons for non-compliance and the presentation of a corrective action Plan (with commitments for a documented execution report, which shall be conveyed to the CAF Ombudsperson with a copy to C-PCG, L-EPCG and CSAS- CG) to deal with the non-compliance and to prevent a new and similar non-compliance situation.
- c) In the case of non-compliance with precedent and without generating environmental or social impact situations, the inclusion in the corrective action plan referred to in b), of administrative changes (changes in management procedures and / or tools, training Additional capacity-building to staff responsible, changes in allocation of responsibilities, staff changes, etc.) seeking to ensure non-repetition of the non-compliance situation.
- d) In case of unprecedented non-compliance and the generation of environmental or social impact situations, or significant environmental or social threat situations, inclusion in the corrective action plan referred to in b), of documentation in accordance with those affected (by environmental or social impact situations, or significant environmental or social threat situations) about corrective action measures and participation in the corrective action plan monitoring. The acceptance of a new corrective action Plan shall only occur as long as the fulfillment of the previous plan of corrective action is documented; otherwise the project will be called off. The implications of a new non-compliance situation could lead to the cancellation of the project.
- e) Failure to comply with precedents, and generation of environmental or social impact situations, or significant environmental or social threat situations, the inclusion in the corrective action Plan referred to in b), of:
  - 1. documentation according with those affected (by environmental or social impact situations, or significant environmental or social threat situations) about the corrective action measures and participation in monitoring the corrective action Plan;
  - 2. Administrative changes such as those mentioned in c) above.Acceptance of a new corrective action plan can only occur as long as the fulfillment of the previous plan of corrective action is documented; otherwise the project will be called off. The implications of a third repetition of non-compliance will lead to the cancellation of the project.

**8.1.3. Internal control processes in response to documented non-compliance of commitments entered into regarding management of A & S safeguards applicable to a project**

- i. Along the first year of a CAF-GEF Project implementation, C-PCG shall prepare a document dealing with lessons learned (for exclusionary dissemination for PP), in which the CAF-GEF E&S Safeguards Management model learning shall be reflected . Those responsible for developing the Project Idea, the L-EPCG, CSAS-CG, D-DACC and all EOGC members are responsible for monthly conveying in

writing to C-PCG the learning mistakes, drawbacks, weaknesses, inconsistencies, ambiguities, etc. as well as opportunities for improvement found over management of CAF-GEF Projects. C-PCG shall update on a monthly basis the lessons learned document, once this has been authorized by D-DACC. After the first year, the communication to C-PCG described above, as well as an updating of the lessons learned document shall be made on a quarterly basis.

- ii. It is the responsibility of each and every EPCG member becoming aware of a non-compliance situation of commitments entered into vis-à-vis E&S Safeguard management applicable to a project, to document and to report such a situation in writing, via email (including documentary backup) to L-EPCG, C-PCG-CG and CSAS. Similarly, it is the responsibility of each and every EPCG member becoming aware of a situation likely arising: 1. breach of commitments being entered into regarding E&S Safeguards management applicable to a project; 2. Environmental and Social Impacts (or threat thereof) not adequately covered by the impact management measures envisaged, to document and to report such a situation in writing the same way.
- iii. In the event of every situation reported as described in paragraph above, CSAS-CG shall conduct an investigation on the basis of it CSAS-CG shall report causes, who is responsible, corrective actions and preventive actions identified and shall set forth a corrective action plan (corrective actions may include amendments of documents and tools involved in CAF-GEF projects management. Once reviewed and approved by C-PCG, this report shall be conveyed to D-DACC, CSAS-CG first and second C-PCG, as the instances responsible for monitoring the corrective action Plan.
- iv. It is the responsibility of D-DACC coordinate with C-PCG and CSAS-CG implementation support activities, updating, training (in the job training or by third parties), the development of documents and instruments and other solutions to correct the identified causes of the situations reported under paragraph ii. above.
- v. Over the first year a CAF-GEF Project is being executed, EPCG members identified as responsible for situations being reported under paragraphs ii. and iii. Above, shall be the subject of backup activities, updating, capacity-building as referred to in paragraph iv. above. This applies only to the first situation of the same type in which the EPCG member is in, and to situations which have not being included in monthly lessons-learned reports prior to the situation being identified. Otherwise, the EPCG member shall be subject to the application of internal control actions as described in paragraph vi below.
- vi. In the case of responsibility actions being identified and documented by a EPCG member, which have generated situations reported under paragraphs ii. and iii, it is the responsibility of D-DACC, in consideration of: 1. the seriousness, implications and consequences of the identified situation: 2. awareness given, received or experienced (different levels of capacity-building, communications, experience) thereon; 3. the responsibilities explicitly being attributed to the EPCG member; 4. The foreseeable opportunities for the situation to be avoided. 5. The timeliness and effectiveness evidenced in the way how the situation is being

addressed; 6. Commitment of negligence; lack of consultation or unexplained or unjustifiable communication, applying one or more of the following control actions:

- a) Verbal reprimand.
- b) Commitment for remedial action within the context of the EPCG member's job responsibilities.
- c) Warning memorandum
- d) Suspension from work for up to a week.
- e) Exclusion of responsibilities in the project.
- f) Likelihood for termination of working, in consultation with relevant CAF instances.
- g) Breach of non-compliance with precedents and generation of environmental or social impact, or significant environmental or social threat situations
- h) NOTE: This subject (paragraph vi and its a)... g) parts) is still a matter of internal discussion.

## 8.2. Instruments for Planning and Monitoring Activities Along the Project Cycle

- i. **NOTE:** In the different sets of similar or related documents described below, the less general documents may be considered as components of longer documents (e.g., different Monitoring Plans) or may be handled as separate documents. The specific management will be defined on the basis of experience and the unique Project conditions, and shall be established for each project in a procedure to be set forth by the L-EPCG and shall be recorded in a Master listing of Project documents, attached to such a procedure. This listing will clearly show those documents that are attached to other procedure.

### 8.2.1. Project Identification

- i. CAF – GEF PROJECT Prioritization document: Strategic Planning of Activities Document. Responsibility for drafting up this document, monitoring and updating: C-PCG.

### 8.2.2. Project Concept

- i. Preliminary planning for Preparation of the Project Concept Document (PIF Format). Responsible for preparation: C-PCG. Responsible for monitoring: L-EPCG.
- ii. Planning for Preparation of Project Concept Document (PIF Format). Responsible for preparation: L-EPCG. Responsible for monitoring: L-EPCG.

### 8.2.3. Design and Project Preparation

- i. Project Preparation Planning (PAD). Responsible for preparation: L-EPCG. Responsible for monitoring: L-EPCG.
- ii. Update Planning for Project Preparation (PAD), in consideration of disclosure, consultation and participation requirements for each safeguard. Responsible for preparation: L-EPCG. Responsible for monitoring: L-EPCG.

- iii. Update Planning for Project Preparation (PAD), after PIF approval by GEF Council. Responsible for preparation: L-EPCG. Responsible for monitoring: L-EPCG.
- iv. Corrective plan to address concerns as advised by GEF Council over the PIF Plan approval. Responsible for preparation: C-PCG. Responsible for monitoring: L-EPCG.
- v. Updating Planning for Project Preparation (PAD) on the basis of outcomes of the field visit to the project site. Responsible for preparation: L-EPCG. Responsible monitoring: L-EPCG.
- vi. Monitoring and evaluation plan for Project Preparation - PAD (included in the Project Preparation Planning - PAD). Responsible for preparation: L-EPCG. Responsible for monitoring: L-EPCG.
- vii. Strategy to disseminate information and public consultations vis-à-vis the project. Responsible for preparation: L-EPCG and PP. Responsible for monitoring: L-EPCG.
- viii. Procedure to verify qualifications of professionals responsible for management activities of each safeguard, throughout the project cycle (including Gender Mainstreaming). Responsible for preparation: L-EPCG and PP. Responsible for monitoring: L-EPCG and responsible for each Environmental and Social Safeguard.
- ix. A Plan to implement the Social and Environmental Evaluation Safeguard to the Project including a Planning exercise to design the Project Environmental and Social Assessment Instrument. Responsible for preparation: L-EPCG and PP. Responsible for monitoring: L-EPCG.
- x. Follow-up, Monitoring Plan, and reporting to design the Environmental and Social Evaluation of Project (ESIA / ESMP). Responsible for design: Responsible for E&S Evaluation assigned to the Project, EPCG and L-PP. Responsible for monitoring: Responsible for E&S Evaluation assigned to the Project, and L-EPCG.
- xi. For each E&S Safeguard other than Evaluation (including Accountability, Complaints and Grievances System, and Gender Mainstreaming), an Implementation Plan to apply the Safeguard to the project, including a schedule to design the Environmental and Social Safeguard process applicable to the Project. Responsible for drafting up the Plan: Responsible for Safeguard assigned to the Project, EPCG and L-PP. Responsible for monitoring: Responsible for Safeguard assigned to the Project and L-EPCG.
- xii. Plan follow-up, Monitoring and Reporting to design each environmental and social safeguard instrument applicable to the Project. Responsible for development: Responsible for Safeguard assigned to the Project, EPCG and L-PP. Responsible for monitoring: Responsible for Safeguard assigned to the Project and L-EPCG.
- xiii. Monitoring Plan and Logical Framework Evaluation.
- xiv. For each E&S Safeguard applicable to the Project, a regular summary- report, for PAD under way, about the particular conditions for application of the safeguard, and progress being made vis-à-vis the applicable safeguard instrument chosen.



- xv.** Project Design Global Progress Evaluation (EGAD). Responsible for preparation: D-DACC. Responsible for monitoring: L-EPCG.
- xvi.** Monthly follow-up meetings to monitor progress of Project and E&S Safeguards Management (including Accountability and Gender Mainstreaming). Responsible for convening and coordination: L-EPCG. Participants: L-EPCG, PP (and project team) Responsible for Safeguarding assigned to the project (EPCG).
- xvii.** Progress coordination meetings E&S Safeguards management (including Accountability and Gender Mainstreaming), convened for specific issues and circumstances. Responsible for convening and coordination: L-EPCG and Safeguard Managers assigned to the Project (EPCG). Participants: L-EPCG, PP (and project team), Responsible for Safeguards assigned to the project (EPCG).
- xviii.** E&S Safeguards management evaluation meetings (including Accountability and Gender Mainstreaming), convened to review issues and circumstances relating to a complaint. Responsible for convening and coordination: C-PCG and Safeguard Managers assigned to the Project (EPCG). Participants: C-PCG, PP (and project team), Responsible for Safeguards assigned to the project (EPCG).
- xix.** Minutes of Meeting. Recording actions or corrective action Plans agreed upon during the meeting concerned. Responsible for preparation: Meeting chairperson. Responsible for monitoring L-EPCG and other officials, as recorded in Minutes. Likely types of meeting:
  - Project Concept Start-up Meeting
  - Project Preparation Early Start Meeting.
  - Project Preparation Start-up Meeting.
  - Project Implementation Start-up Meeting.
  - Responsible for Project Safeguard PP Team PP Counterpart.
  - Decision-making Meeting: Final Revision of Project before final evaluation (Project Appraisal).
  - Complaints follow-up meetings.
- xx.** Meeting registration. Physical file, and hard copy, and physical copy of Minutes of all Project meetings throughout the Project cycle. It includes an Excel file with the meetings listing (internal EPCG, EPCG with PP, information disclosure, public consultation, stakeholder involvement, and others), meeting their dates, participants and key issues. Responsible for keeping and maintaining records: L-EPCG. Responsible for monitoring L-EPCG.
- xxi.** Documented monthly reports, throughout the project cycle, L-PP to EPCG, on the progress and status of the relevant management processes for each E&S Safeguard. Responsible for its preparation: PP. Responsible for monitoring L-EPCG, and responsible for Safeguard for each project.
- xxii.** Quarterly report to C-PCG on progress and status of Project Design and Preparation (or before a three month cycle is over in response to unforeseen events or circumstances); It includes a consolidated quarterly report on progress and status of relevant management processes for each E&S Safeguard y report. Responsible for its production: PP (check L-EPCG). Responsible for monitoring: C-PCG.

- xxiii. Quarterly report to D-DACC throughout the project cycle from the beginning of the Design and Preparation stage, per each Project, on progress and status of Project Design and Preparation (or before completing a three-month cycle in response to unforeseen events or circumstances). This report includes comments relevant to the PP report. Responsible for preparation: C-PCG. Responsible for monitoring corrective action plan: C-PCG.
- xxiv. Quarterly report, throughout the project cycle from the start of the Design and Preparation Stage, per each Project, to be conveyed to C-PCG, D-DACC and CAF Ombudsman, on progress and status of EPCG management processes for each E&S Safeguard. This report includes comments relevant to the PP report. Responsible for preparation: L-EPCG (attaches revision comments memorandum: CSAS-CG). Responsible for monitoring: CSAS-CG. NOTE: Each semester, the second report shall include (internal or external) audit findings.
- xxv. Corrective action plans. Responsible for preparation: L-EPCG and PP. Responsible for monitoring: L-EPCG. These plans may originate as remedial action in case of visit reports, findings of nonconformity verifications (from EPCG or audits), gaps, irregularities, delays in the forecasted Environmental and Social Safeguards assurance management.
- xxvi. Corrective action plans arising from the investigation of complaints or allegations of irregularities. Responsible for preparation: C-PCG and PP. Responsible for monitoring: C-PCG.
- xxvii. Annual internal audit (to be held during the first half of each year, from the first year of activities of CAF-GEF projects) of CAF-GEF Environmental and Social Safeguards Management. The audit will have two scopes of action: 1. Performance of each project; 2. The CAF-GEF Environmental and Social Safeguards DACC Assurance System. Responsible for the preparation, implementation and reporting: CSAS-CG and CAF-GEF Environmental and Social Safeguards internal auditors (trained by CSAS-CG, after the first year of activities of CAF-GEF projects). Responsible for monitoring its corrective action plan: C-PCG.
- xxviii. Annual external audit (to be held over the second half of each year, as from the first year of activities of CAF-GEF projects) of performance evaluation of CAF-GEF Environmental and Social Safeguards Management. The audit will have two scopes of action: 1. The performance of each project; 2. The DACC assurance system of CAF-GEF Environmental and Social Safeguards Management. Responsible for preparation, implementation and reporting: External consultant. Responsible for monitoring corrective action plan: C-PCG.

#### 8.2.4. Project Implementation

- i. Planning for Project implementation (PAD). Responsible for preparation: L-EPCG. Responsible for monitoring: L-EPCG.
- ii. Follow-up Plan, Monitoring, Evaluation and Reporting to implementat ESIA / ESMP. Responsible for preparation: Responsible for E&S Evaluation assigned to

- the Project, EPCG and L-PP. Responsible for monitoring: Responsible for E&S Evaluation assigned to the Project and L-EPCG.
- iii. Follow-up Plan, Monitoring, Evaluation and Reporting for implementation of each Environmental and Social Safeguard instrument applicable to the Project. Responsible for preparation: Responsible for Safeguard assigned to the Project, EPCG and L-PP. Responsible for monitoring: Responsible for Safeguard assigned to the Project and L-EPCG.
  - iv. Logical Framework Monitoring and Evaluation Plan. Responsible for preparation: CSAS-CG. Responsible for monitoring: L-EPCG.
  - v. Project Reporting Plan before GEF. Responsible for preparation: C-PCG. Responsible for monitoring: C-PCG.
  - vi. Monthly meetings to monitor Project progress, and E&S Safeguards Management progress (including Accountability and Gender Mainstreaming). Responsible for convening and coordination: L-EPCG. Participants: L-EPCG, PP (and project team) Responsible for Safeguard assigned to the project (EPCG).
  - vii. Progress coordination meetings: E&S Safeguards Management (including Accountability and Gender Mainstreaming), convened for specific issues and circumstances. Responsible for convening and coordination: L-EPCG and Safeguard Managers assigned to the Project (EPCG). Participants: L-EPCG, PP (and project team), Responsible for Safeguarding assigned to the project (EPCG).
  - viii. E&S Safeguards Management evaluation meetings (including Accountability and Gender Mainstreaming), convened to review issues and circumstances relating to a complaint. Responsible for convening and coordination: C-PCG and Safeguard Managers assigned to the Project (EPCG). Participants: C-PCG, PP (and project team). Responsible for Safeguards assigned to the project (EPCG).
  - ix. Meeting Minutes. Recording actions or corrective action Plans agreed upon during the meeting concerned. Responsible for preparation: Meeting Chairperson. Responsible for monitoring L-EPCG and other officials as recorded in Minutes. Likely types of meeting:
    - Project Concept Start-up Meeting
    - Project Preparation Early Start Meeting.
    - Project Preparation Start-up Meeting.
    - Project Implementation Start-up Meeting.
    - Responsible for Project Safeguard PP Team PP Counterpart.
    - Decision-making Meeting: Final Revision of Project before final evaluation (Project Appraisal).
    - Complaints follow-up meetings.
    - Follow-up meetings to complaints.
  - x. Meeting registration. A physical file with an electronic copy, and a physical copy of each of the Minutes of all Project meetings throughout its cycle. It includes an Excel file with a listing of meetings (internal EPCG, EPCG meetings with PP, information disclosure, public consultation, stakeholder involvement, and others), dates, participants and key issues. Responsible for preparation and maintenance: L-EPCG. Responsible for monitoring L-EPCG.

- xi.** Documented PP to L-EPCG monthly reports, throughout the project cycle, PP, on the progress and status of the relevant management processes for each E&S Safeguard. Responsible for preparation: PP. Responsible for monitoring L-EPCG and Safeguard responsible for each project.
- xii.** Quarterly report to C-PCG and D-DADD on progress and status of Project implementation (or before completing a three-month cycle in response to unforeseen events or circumstances). It includes consolidated quarterly report on progress and status of relevant management processes for each E&S Safeguard. Responsible for preparation: PP (reviews: L-EPCG). Responsible for monitoring: CSAS-PCG, C-PCG.
- xiii.** Quarterly report to D-DACC throughout the project cycle as from the start of the Project Design and Preparation Stage on progress and status of the Project design and preparation (or before completing a three-month cycle in response to unforeseen events or circumstances). This report includes comments relevant to the PP report. Responsible for preparation: C-PCG. Responsible for monitoring its corrective action plan: C-PCG.
- xiv.** Quarterly report, throughout the project cycle as from the start of the Design and Preparation stage for each Project before C-PCG, D-DACC and CAF Ombudsman, on EPCG management progress and status corresponding to processes for each E&S Safeguard. This report includes comments to the relevant PP report. Responsible for preparation: L-EPCG (reviews and attaches memorandum with comments: CSAS-CG). Responsible for monitoring: CSAS-CG. NOTE every six months, the second report will include relevant (internal or external) audit results.
- xv.** Corrective action plans. Responsible for its preparation: L-EPCG and PP. Responsible for monitoring: L-EPCG. They may be originated as remedial action in case of verification of reports, visits, findings of nonconformity (from EPCG or audits), gaps, irregularities, delays in planned management of Environmental and Social Safeguards assurance.
- xvi.** Corrective action plans arising from the investigation of complaints or allegations of irregularities. Responsible for preparation: C-PCG and PP. Responsible for monitoring: C-PCG.