FEEDBACK AND GRIEVANCE REDRESS MECHANISM (FGRM)

MINISTRY OF ENVIRONMENT AND FORESTRY

Jambi Province

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CHAPTER I. INTRODUCTION

1.1 Background and Objectives

The BioCarbon Fund Initiative for Sustainable Forest Landscapes (BioCF-ISFL) is a multilateral fund supported by donor governments and managed by the World Bank. It promotes reducing greenhouse gas emissions from the land sector, deforestation and forest degradation in developing countries (REDD+), sustainable agriculture, and more innovative land-use planning, policies, and practices. The BioCarbon Fund Initiative for Sustainable Forest Landscape (BioCF-ISFL) has provided the Government of Indonesia (GOI) with a grant to support the preparation of REDD+ (Reducing Emissions from Deforestation and Forest Degradation) implementation.

The Emission Reduction Program (hereafter ERP) will advance the implementation of REDD+ at the national level, thus contributing to significant and international emissions reductions. This Program is also expected to assist Indonesia in achieving its climate resilience targets and international commitments. A general framework for the development and implementation of the Program occurs in three phases, namely : (I) Preparatory Activities – Support the creation of an enabling environment, (II) Pre-Investment – Implementation of strategic and scalable priority investments in sustainable land use management, and (III) Emission Reduction Program – Results-based payments that sustain a low-carbon pathway and leverage other investments.

Under the pre-investment grant, technical assistance will be provided to support piloting targeted initiatives toward emission reductions and ERP design. Institutional capacity building will focus on strengthening systems to build government capacity to access and utilize performance-based incentives for reduced deforestation, degradation, and land use change, including protection. The program will support analytics, capacity building, and subprogram design to test different incentive models and stakeholder engagement. Key areas of analysis include land and resource tenure, local understanding of causes of deforestation and how best to address them, legal, institutional, and policy analysis, and stakeholder assessment. Also, safeguard and build the grievances system.

Safeguards comprise measures to mitigate negative impacts on the community and the environment resulting from implementing ERP activities. Safeguards cover various issues, including transparency, inclusive participation, access to information and recourse, respect for the traditional knowledge and rights of Indigenous Peoples and local communities, conservation of biodiversity and natural forests, management of displacement/leakages, and reversals, etc.

A Feedback and Grievance Redress Mechanism (FGRM) has been set up to provide a clear set of procedures to enable affected and interested stakeholders to raise their concerns and suggestions regarding the ERP and how those concerns and recommendations will be acted upon.

The ERP FGRM has been consulted with relevant stakeholders at the sub-national level. The Stakeholders include local communities, private companies, local governments such as *Regional Apparatus Organizations* (OPD), the Joint Secretariat for Forest Resource Management (SEKBER), non-governmental organizations, and other development partners working with and connecting for the program.

1.2 Scope and Definition

Grievance Redress Mechanism is a process for receiving, evaluating, handling, and recording complaints from all aspects directly related to J-SLMP implementation and the broader public who may have concerns and interest in the program activities.

The scope of the FRGM is complaints are the submissions of information orally or in writing from each reporter to the responsible agency, regarding the alleged occurrence of violations, potential and/or impacts in the environmental and/or forestry sector from the business and/or activities in the planning, implementation and/or post-implementation. Plaintiffs can be individuals, groups of people, legal entities, or government agencies who complain about project implementation's alleged environmental and social impacts.

FGRM is a means for early identification, assessment, and resolution of any complaints or conflicts over physical activities and investments in this J-SLMP project. The objectives of FGRM in this Project are fivefold:

- Provide easy access to the community, especially members of the affected community, to submit complaints and/or concerns about a particular physical activity or investment (sub-project);
- To identify and assess the nature of the complaint and/or concern and agree on a solution as early as possible so that constructive input can be considered in the design of the activity and/or physical investment.
- Avoid stopping project activities or investments later due to ignorance of complaints or conflicts, resulting in uncontrolled conflicts and high costs.
- To obtain support from the affected community/social permission to operate for the proposed activity.
- To enable a feedback loop from the broader public for continuous improvement.

It is important to ensure that relevant concerns and suggestions are incorporated during project preparation and implementation and inform necessary adjustments. J-SLMP needs to strengthen the current FGRM system in various implementing agencies at the national, provincial, and district/city levels to better manage complaints and conflict resolution processes, especially for activities related to J-SLMP implementation.

FGRM covers aspects directly related to J-SLMP implementation. Broader aspects related to land and natural resource management in Jambi Sub-National Province can also be captured through

the proposed FGRM as the mechanism will build on existing systems within the implementing agency. Therefore, the focus will be on strengthening institutional capacity for land and natural resource management, including managing grievances and conflicts arising from improvements in these areas.

An effective FGRM can accelerate the achievement and improve the quality of the ERP outcomes. Although the discussion on the FGRM in this ESMF is targeted at environmental and social issues, it is not exclusively implemented to cater to these two issues but for broader issues related to the ERP. The FGRM covers technical-related aspects of construction, environmental and social issues, and any other complaints directed toward the ERP. The FGRM applies for complaints handling and conflict resolution during ERP preparation, implementation, and completion.

The FGRM for the ERP refers to the Regulation of Minister of Environment and Forestry No P.22 of 2017 on Grievance Management Mechanism of Pollution and/or Environment Destruction and/or Deforestation and Forest Degradation. Its general provisions state that complaints are defined as "verbal or written communication from complainants to the respective institution(s) in charge, on matters related to infringements of the laws, potential impacts on the environment and/or forests as a result of planning, implementation, and post-implementation of commercial activities*." Grievance redress is the management of complaints, consisting of grievance receipt, investigation, verification, reporting, and follow-ups*. Grievance categories under the law include:

a. Environmental Pollution: the introduction of organisms, substances, energy, and/or other components into the environment through human activities, causing the exceedance of environmental threshold standards;
b. Environmental destruction: human actions that cause direct and/or indirect changes to the physical, chemical, and/or biological elements of the environment leading to the exceedance of the environmental threshold standards;
c. Forest destruction: the process, means, or actions that destroy the forest through illegal logging, unauthorized use of forests, or inappropriate use of a license in a forest concession area that has been granted, assigned, or in the process of granting.

On the matters beyond the three categories above, the FGRM BioCF ISFL Program Mechanism defines a complaint as a complaint made by an individual, group, and/or legal entity related to program performance and policy implementation. In addition to addressing common complaints, FGRM BioCF ISFL also accommodates citizens' aspirations such as ideas, suggestions, and praise.

Each institution will manage conflict resolution based on national and regional regulations under related sectors such as forestry, plantations, and mining. Conflict resolution can also be managed at the district and village levels.

1.3 Summary of the Program BioCF ISFL – JERR

The J-SLMP will support a combination of enabling conditions and promotion of sustainable management practices that will directly address the underlying causes of emissions resulting

from sectoral activities, including plantations, plantation crops, subsistence agriculture, aquaculture, and unsustainable logging practices. The project design considers the distribution of the remaining forests, the threats to these forests, and the key stakeholders involved in each area. The program consists of three components, as follows:

Component 1 on Policy and Institutional Strengthening: The objective of Component 1 is to improve regulation and enforcement of effective land management in Jambi with a focus on harmonization of policies and approaches that are essential for managing emissions from land use, including peat management, fire prevention, and management, and grow green. This component will address the lack of institutional capacity to ensure good forest and land use governance. This component aims to improve the regulatory and institutional framework in forestry and other land-based sectors and strengthen the instruments to enforce these policies.

Component 2 Implementation of Sustainable Land Management: Component 2 aims to integrate forest and land management in Jambi, mainly through sustainable forest management, agricultural intensification and diversification, conservation and restoration, and value chain sustainability. This component will address the lack of sustainable land and resource management practices.

Component 3: Project Management, Monitoring and Evaluation, and Reporting: This component envisages the overall management of the J-SLMP implementation and supports collaboration between stakeholders in sustainable forest management. Component 3 aims to help national and provincial-level project coordination and management to achieve project objectives, including Annual Work Plans and Budgets (AWPBs); fiduciary aspects (Financial Management (FM) and procurement); Human Resource Management; monitoring of security compliance; monitoring and evaluation (M&E); management and knowledge sharing; and implementation of a communication and stakeholder engagement strategy. In addition to overall project monitoring and evaluation, this component also addresses emission monitoring, assessment, and reporting.

Table 1.1 The link between J-SLMP activities and the underlying drivers of deforestation and forest degradation

Key fundamental drivers	Indicative activities to address drivers	Proximate drivers are covered
Unauthorized/illegal activities Tenure conflicts	Conflict resolution (mediation) through formal channels relevant to forestry, plantation, and environmental regulations. Conflict resolution (mediation) through traditional channels (customary leaders) . Revocation of license to ensure clean-and-clear status. Control of illegal mining activities. Control of encroachment in HTI concessions, protected forests, and conservation areas. Increase the capacity of FMUs to address drivers. Remediation to overcome pollution and pollution.	All
food sustenance	Sustainable agriculture and intensification strategies.	Plantation, agriculture, and horticulture

	Capacity building for smallholders to adopt (RSPI/ISPO). Optimizing the use of organic fertilizers and pesticides for sustainable plantations and agriculture. Social forestry to optimize NTFPs and wood by-products. Conservation partnerships for communities around conservation areas. Participatory planning to address livelihood issues and sustainable agriculture from *the* Village Funding.	Village Development Risk of leakage and reversal
Migrant entry	Stopping/controlling illegal land transactions	Plantation crops (oil palm and coffee) Leakage risk
Indigenous people's activities	Assess potential impacts on indigenous peoples. Optimizing the knowledge and participation of indigenous peoples in forest management (eg *Customary Forests)*. FPIC leading to the consent of indigenous peoples.	Plantations, plantations, land claims
Infrastructure development in forest areas	Identification of physical and cultural resources. Alignment of spatial structure in provincial spatial plans with Green Development.	Claims for access roads in national parks and/or in World Heritage Sites
Forest & peatland fires;	Activation of MPAs, supported by the provincial government, and central government (BRG). Community Health & Safety aspects training in fire prevention and firefighting. Incentives for MPAs. Adopt non-burning techniques in land preparation (can be part of ISPO/RSPO certification). Regulatory instruments for fire control and prevention.	Forest and Peat Fires Plantation crops Reversal risk
Weak forest governance	Capacity building for FMUs, TAHURA, and other institutions in dealing with environmental and social risks (e.g., community involvement, outreach, participatory planning). Review and synchronization of cross-sectoral policies. Enforcement of plantation forest moratorium.	Forestry
Limited facilities, equipment, and resources for effective forest protection & management	Improve institutional capacity to manage potential environmental & social risks through basic and thematic training. Provision of equipment and facilities to ensure effective forest protection and management Implementation of SMART patrols.	Forestry
Gender and social inclusion	Gender mainstreaming to ensure equal access to livelihoods.	All sectors

	Gender mainstreaming to enable equal gender participation in forest/land management (eg, social forestry, sustainable agriculture, and plantations).	
Forest Encroachment Lack of effective forest protection and management	Preventing Forest Encroachment by migrants and local communities. Rehabilitation of damaged forest/ecosystem restoration.	Forest, conservation area
Threats to species and their habitats	One Map of wildlife corridor Environmental Code of Practice Implementation Biodiversity action plan (following the species strategy and action plan from MoEF) Anti-poaching patrol	Non-carbon benefits

1.4 Legal Frameworks

FGRM will follow applicable regulations governing the management of environmental and social impacts resulting from activities carried out by participating institutions. One of them is the Decree of the Minister of LHK No. 24/Menhut-II/2015 regarding the Complaint Handling Team related to NS. Environment and Forestry as regulated in Ministerial Regulation no. P.22/2017, while other regulations related to the implementation of FGRM include:

1. Government Regulation No. 2/2015 on Technical Guidelines for Social Conflict Resolution allows the local wisdom system to be used as an effort to prevent conflict.
2. Presidential Regulation Number 88 of 2017 concerning Land Tenure Settlement in Forest Areas
3. Ministry of Environment and Forestry Regulation No.P.84/2015 concerning Tenure Conflict Resolution (Handling of Tenurial Conflicts in Forest Areas).
4. Joint Regulation of the Ministry of Home Affairs (Kemendagri), KLHK, Ministry of Public Works, and the National Land Agency (ATR/BPN) no.79/2014, No.3 of 2014, No.1 of 2014, and No. 8 of 2018 concerning Procedures for Settlement of Tenure in Forest Areas.
5. Ministry of Environment and Forestry Regulation No. P.83/MenLHK/SEKRETARIS-KUM.1/7/2018 concerning Regulations for the Implementation of Law Enforcement Related to Environment and Forestry at the Regional Level.
6. Minister of Environment and Forestry Regulation No.P.22/MenLHK/SETJEN/SET.1/2017, concerning procedures for managing complaints of alleged pollution and/or environmental destruction and/or forest destruction.

To resolve conflicts related to the management of areas under IUPHHK (Business Permit for Utilization of Timber Forest Products), a working group has been formed by the Jambi Provincial Government, including:

1. Formation of the Examination Team based on the Decree of the Governor of Jambi Number 53 /Kep.Gub/B/EKBANG/2008 dated January 28, 2008;

2. The Integrated Team (Team Terpadu) by Decree Number 141/Kep.Gub/BAKESBANGPOL-5.1/2019 concerning the Establishment of an Integrated Team for Handling Social Conflict in Jambi Province;
3. Jambi Province Working Unit (POKJA) Number 1471/KEP.GUB/DISHUT/2017 concerning the Establishment of a Working Group (POKJA) for the Acceleration of Social Forestry in Jambi Province;
4. Decree of the Head of the Jambi Province Forestry Service Number 168/kpts/Dishut/VIII/2018 concerning the Establishment of the Conflict Resolution Team for PT. Lestari Asri Jaya and PT. Mukti Wisesa, Tebo Regency;
5. The decision of the Head of the Jambi Provincial Forestry Service No: SK.16/kpts/DISHUT-5.3/2019 concerning the Establishment of a Verification and Validation Team in the Context of Handling Forest Tenure Conflicts in the Working Area of PT IUPHHK-HTI Agronusa Alam Sejahtera in Sarolangun Regency;
6. Decree of the Head of the Jambi Province Forestry Service Number: SK.24/kpts/DISHUT-5.3/2019 concerning the Establishment of a Verification and Validation Team in the Context of Handling Conflicts over Forest Area Control in the PT IUPHHK-HTI Working Area. Agronusa Alam Sejahtera in Sarolangun Regency;
7. Decree of the Head of the Jambi Provincial Forestry Service No: SK.31/kpts/DISHUT-5.3/2019 concerning the Establishment of a Verification and Validation Team in the Context of Handling Forest Tenure Conflicts in the PT IUPHHK-HTI Working Area. Samhutani entered Sarolangun Regency.
8. Decree of the Head of the Jambi Province Forestry Service Number: SK.126/kpts/DISHUT-5.3/2019 concerning the Establishment of a Verification and Validation Team in the Context of Handling Forest Tenure Conflicts in the PT IUPHHK-HTI Working Area. Wirakarya Sakti in Tebo Regency.
9. P.70/MENLHK/SETJEN/KUM/1/12/2017 concerning Procedures for Implementing Reducing Emissions from Deforestation and Forest Degradation, Role of Conservation, Sustainable Forest Management, and Increasing Forest Carbon Stock.

A Safeguards Field Team has been formed in the SN-PMU structure through the Jambi Governor's Decree Number: 687/KEP.GUB/BAPPEDA-2.3/2020. The safeguards team under the Environmental Agency coordinator in Jambi Province will be tasked with managing the implementation of safeguards, including the operationalization of FGRM. The security sector will coordinate with the existing working groups listed in the decision for the J-SLMP project.

1.5 Key Principles of Grievance Mechanism

Based on the discussion of the head of the security sector and the head of the SN-PMU and by P.22/2017, a debate has been carried out that in handling complaints related to degradation and deforestation will still pay attention to the following principles:

1. **Free.** Stakeholders can file complaints free of charge through various channels available at each level, i.e., district, provincial and national.

2. **Fairness/Participatory**. Stakeholders who submit complaints must be treated fairly and not threatened access, follow-up on complaints, and resolution of conflicts regardless of origin, ethnicity, religion, national status, and social and economic background.
3. **Immediate/Fast Response**. Complaints and feedback will be resolved at the lowest level as soon as possible. Cases that cannot be resolved at a lower level will be brought to a higher level;
4. **Accountable**. Implementation of complaints following established principles and applicable rules;
5. **Objective and Transparent.** The complaint handling system will maintain the principles of objectivity, transparency, and fairness by having an independent mediation team based on the need and willingness to assist those who complain at any level.

Whistle-blowers who are still dissatisfied with the follow-up or settlement provided may continue to seek other resolutions through the litigation process by the laws and regulations in Indonesia.

CHAPTER 2. THE FGRM STRUCTURE AND INSTITUTIONAL ARRANGEMENTS

The FGRM institution has a three-level system: district/city, provincial and national. FGRM at lower levels may be hierarchically linked to higher levels (and vice versa), depending on the nature of the complaint and its follow-up.

The FGRM process outlined in this document has been operated at the national and sub-national levels. In the ERP JSLMP program, FGRM will have two methods at the sub-national level; first, the complainant can submit a complaint directly to the authorized agency (OPD) at each level, or it can be facilitated by the safeguards team, who will ensure that the reported complaint reaches the relevant official agency. Secondly, the complaint will be on the SP4N LAPOR Jambi Province website https://www.lapor.go.id/. The website is under development by the Safeguard Team and communication and Information Agency Province Jambi. At the national level, complaints can be made through the website https://pengaduan.menlhk.go.id and managed by the Directorate General of Environmental and Forestry Law Enforcement (Ditjen PHLHK or Ditjen GAKKUM) which KLHK has mandated to handle complaints related to ERP at the national level. The institutional chart for the implementation of FGRM is shown in Figure 1.

The object here is what problems can be used as complaints, namely: forest degradation and deforestation triggered by tenure (related to land and the potential above and below it); Conflict of interest with the JSLMP program; Sectoral: Illegal mining, Illegal drilling; complaints associated with the implementation of pre-investment and Result Base Payment (RBP) funds.

MoEF assigns the Director General of Law Enforcement (DGLE) to be responsible for handling complaints at the national level.

At the sub-national level, complaints will be dealt with, reported, and coordinated by the Provincial Environmental Service (DLH), the coordinator of the safeguard team that carries out daily activities.

At the district/city level, the overall implementation of FGRM will be supervised by the National Park, KPHP, and City/Regency DLH under the coordination of the Provincial Environmental Service (DLH). The district-level implementing agencies will be responsible for managing complaints that may arise from the project activities that each of these agencies is implementing. Solving complex problems may require inter-agency coordination and high-level ministerial decisions.

Each agency will appoint personnel or person in charge to coordinate handling complaints within their respective agencies. At the Program level, personnel assigned under the coordination of the Safeguard Field will be appointed to oversee the operations of the FGRM. During implementation, complaint handling will be consulted with stakeholders such as community representatives, Indigenous Peoples, local government agencies (OPD), and SN-PMU BioCF ISFL.

2.1 National Level

Based on the Ministerial Regulation of MoEF No P.22/2017, MoEF is authorized to manage grievances related to:
1. Environmental and/or Forestry Permits issued by the Minister (of MoEF);
2. Environmental and/or Forestry Permits issued by the governor or regent/mayor in the event of significant law infringements;
3. Filed complaints that laws and regulations have not been processed;
4. Complaint(s) associated with business and/or commercial activities causing cross-provincial pollution and/or destruction

Other agencies, including the Directorate General of Social Forestry and Environmental Partnership (*Perhutanan Sosial dan Kemitraan Lingkungan/Ditjen PSKL*), Directorate General Climate Change (DGCC), and Directorate of Tenurial Conflicts and Customary Forests (*Pengaduan Konflik Tenurial dan Hutan Adat*/PKTHA). Broader feedback submission and grievances about program management and performance can be made through the following websites (www.pskl.menlhk.go.id/pktha/, http://gakkum.menlhk.go.id/). The DGCC also administers the Safeguard Information System/SIS (www.ditjenppi.menlhk.go.id/sisredd/), enabling feedback and grievance submission.

Based on the MOEF Decree No P22 Year 2017, there are 11 types of complaints that can be submitted and handled by DGLE, including illegal commercial activities in forest areas, environmental destruction and pollution, forest destruction, improper hazardous waste management, illegal logging, forest burning, forest encroachments, poaching, tenurial conflicts in forest areas, unconsented use of genetic resources and local pearls of wisdom, and other infringements of the law. Issues related to tenurial conflicts and customary forests fall under the responsibility of PSKL. There are assigned units established with the mandates to handle grievances, including a grievance secretariat responsible for addressing complaints about environment and forestry issues. DGCC will provide overall oversight of the ERP as the Program Entity.

The institutional roles under the ER implementation at the national level are detailed in Table 2 below.

Table 2.1 National agencies involved in FGRM implementation

NATIONAL AGENCY	STATUS	ROLE
Director General of Climate Change (KLHK)	REDD+ National	- National Registration Management; - FREL development and management;

	Dedicated Functions	- MRV management; - Finalization and implementation of safeguard plans; - Finalization and implementation of FGRM; - Technical support; - Payment Recommendation (BSM); - Handle the Complaints process at the national level; - Updated complaint handling based on SIS-REDD+.
Director General of Law Enforcement	Official Institution	- Recording, screening, investigation, handling and reporting of complaints under Sub National Jambi; - Publish the process and results of the complaint.
Director General of Social Forestry and Environmental Partnership	Official Institution	- Recording, screening, investigation, handling and reporting of complaints under Sub National Jambi; - Publish the process and results of the complaint.

2.2 Sub-National Level or Province (SN-PMU)

The party responsible for ERP implementation is the Provincial Secretariat (SEKDA Province Jambi), with Development Planning Agency (BAPEDA) at Sub-National Level. The sub-national PMU is under Bappeda, coordinated by a senior Bappeda expert/officer, and comprised of government staff and consultants. Bappeda will work in close coordination with the Forestry Service (Dishut), Environmental Service (DLH), Estate Plantation Service (Disbun), and Agriculture Service Agency (*Dinas Tanaman Pangan, Hortikultura, dan Peternakan*) in Jambi to implement the Project's activities. Specifically, the sub-national PMU will be responsible for social and environment safeguards-related tasks and coordinating Project implementation with four KPHs, Four National Parks, and Jambi Natural Resources Conservation Agency (BKSDA).

At the provincial level, the person in charge of implementing the FGRM is the Provincial Environmental Service (DLH), the coordinator of the safeguard team that carries out daily activities. During implementation, coordinate with SN-PMU.

Complaints submitted at the provincial level will follow the procedures applicable in each authorized agency (OPD, KPH, and TN). The Safeguards Committee, with technical support from provincial environmental and social experts, will coordinate all activities, including handling complaints that have been and are being handled related to J-SLMP activities.

Table 6.2 Provincial Agencies Involved in FGRM Implementation

AGENCIES	STATUS	ROLE
Jambi Environment Agency (Environmental *Service*)/Protection Committee	Advisory/Implementing Body	- Provide advice and input to local governments regarding J-SLMP including handling complaints. - Complaint handling.

Other Provincial Government Services (OPD)	Implementing Agency	- ERP implementation. - Leading the consultation process in each Jambi Sub-National. - Project assistance, monitoring, recording, and reporting of ERP implementation. - Complaint handling.

2.3 District / City Level

The district-level implementing agencies will be responsible for managing complaints that may arise from the project activities that each of these agencies is implementing. Solving complex problems may require inter-agency coordination and high-level ministerial decisions. These complaints usually involve decisions regarding the gazettement of state forest areas, changes in forest land ownership status, conversion of forest areas, etc. The complaint handling process is based on the existing mechanisms in each authorized agency (OPD) and the applicable Indonesian regulations. The overall implementation of FGRM will be supervised by the National Park, KPHP, and City-Regency DLH under the coordination of the Provincial Environmental Service (DLH). The institutional chart for FGRM implementation is shown in the following figure 1.

The district safeguard committee will support the district SEKDA and/or district BAPPEDA in coordination and monitoring of overall complaint management, including making recommendations on escalating complaints to higher levels.

Complaints filed by Indigenous Peoples involving tenure claims and conflicts must comply with applicable regulations regarding recognizing these communities and their land rights. These communities can submit their complaints to their respective district or provincial governments and the MoEF based on Decree no. 24/ *Menhut* -II/2015 regarding the Establishment of a Complaint Handling Team Related to Environment and Forestry.

Table 6.3 Level of District/City Agencies Involved in FGRM implementation

AGENCIES	STATUS	ROLE
Service/Environmental Protection Committee	Implementing Agency at Regency/City and Field Level	● Responsible for the implementation and achievement of J-SLMP in the District and Field
District/City OPD	Implementing Agency	● Implementation of the J-SLMP sub-project. ● Complaint handling.

2.4 Village Level

At the village levels, the FGRM process is still under discussion. But, the planning for individuals might be complaints to their respective village governments and/or customary leader(s). and after the complaint is receipted, the village or customary leaders maybe, distribute the complaint to the DLH at the district level, FMU, or National Park Unit, or the individual from the village can directly complain to the FGRM channels.

But, if the case of customary or local communities, grievance mechanism options may adopt existing customary laws (if any) as appropriate and/or any mechanisms provided by the local governments as per communities' request.

The use of local wisdom can be applied to cases such as perceived lack of fairness and mis-information about benefits distribution. Community members may submit such complaints to their village head or the community leader(s). In addressing such complaints, the village head or the community leader(s) will engage complainants through direct communication and/or community meetings regarding the local customs or practices.

Table 6.4 Level of Village Agencies Involved in FGRM implementation

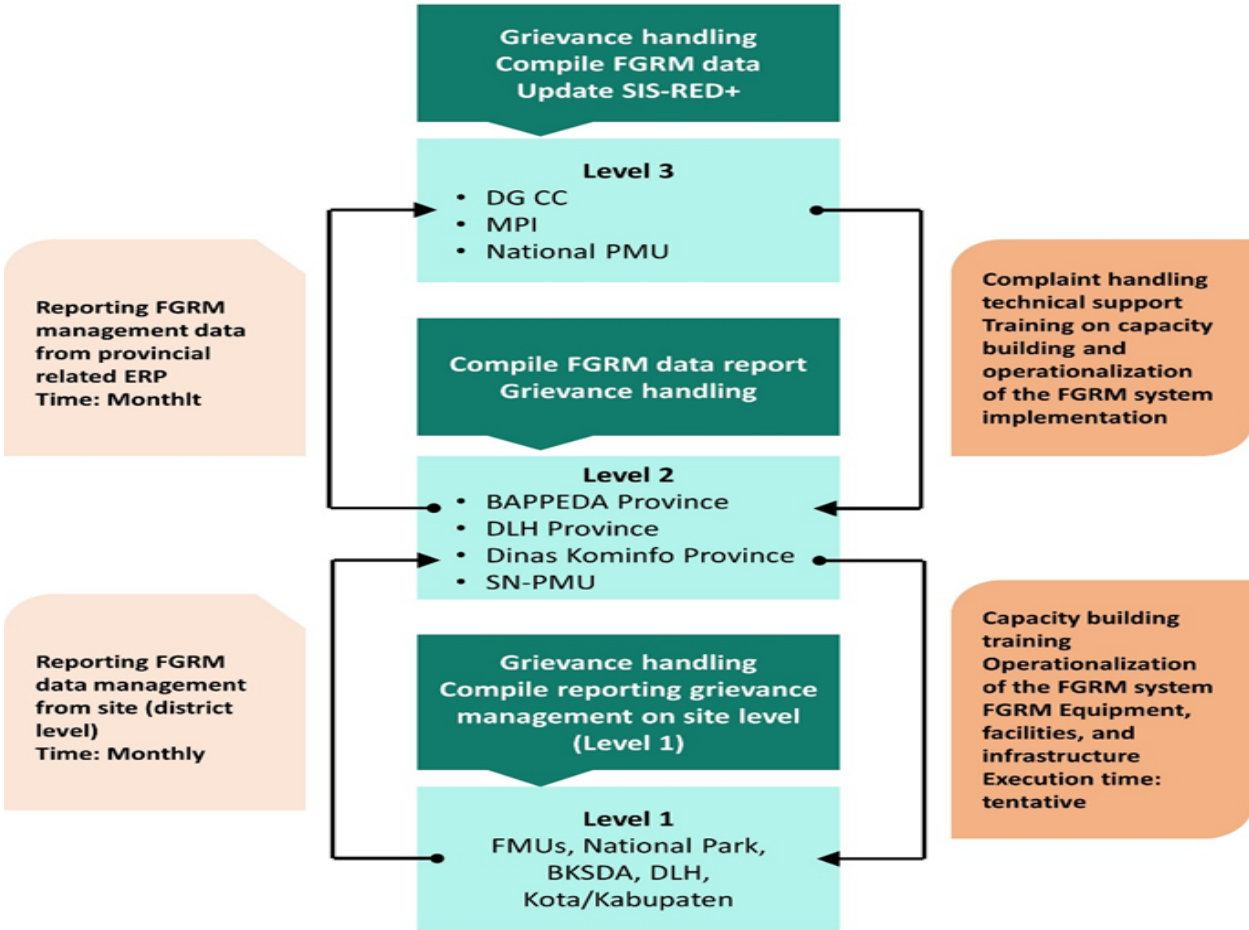| AGENCY	STATUS	ROLE
Village Government	Implementing Agency	• Implementation of ERP at the site level • Grievance handling
Adat Council	Partner	Grievance Mechanism forcustomary communities and/or Indigenous Peoples. Issues may include land claims and access to natural resources

Figure 1. Institutional Indicative Chart for FGRM Implementation

CHAPTER 3. FGRM PROCESS AND CHANNELING

The FGRM process includes a) receipt and record of grievances/complaints/feedback; b) screening and categorizing of grievances/complaints/feedback; c) acknowledgment of receipt and follow-up actions; d) Refer of grievances/ complaints/feedback to the relevant ministries/agencies, including on aspects not related to ERP; e) Reviewing and investigation of ERP grievances/ complaints/feedback, which includes field verification and validation; f) Responding action implementation and g) Closure of grievance status/settlements.

The period for resolving complaints depends on the mechanisms available at each relevant institution—the grievance submission, whereby the process is briefly described as follows.

1. Receipt of complaints can be submitted directly or indirectly if you use an identity card, the result of reporting or complaints in the form of a registered complaint letter which is a maximum of three working days processed.

2. Review Complaint Information, Verification, and Formulation of Problem Identification Results Conduct field verification, make news of field verification events, and take samples, photos, and/or videos of field findings. If the complaint, the Transfer complaint to the relevant work unit/agency if the content is outside the program, a maximum of 14 working days.

3. Follow-up will be carried out If the complaint is proven/found to be another agency of the authorized institution; if the complaint is not verified, then the management of the complaint is declared complete Notifying the results of the direction of the complaint to the complaining party, using a letter of notification of the results of the complaint, a maximum of 3 working days.

3.1 FGRM Process

Individuals could file complainants, groups of people, legal entities, or government agencies and may involve issues related to the ERP implementation's alleged environmental and social impacts. The process of resolving complaints will be based on the characteristics and nature of each case and led by respective implementing government agencies through the existing institutional mechanisms.

Government agencies will also ensure proper documentation of filed grievances and their status. Suppose grievances and/or cases such as conflicts cannot be settled at the agency level. In that case, such grievances shall be conveyed and/or directed to the Regional Secretariat for further investigation. Inter-agency coordination may be called for by the secretariat as needed.

3.1.1 Record Grievances and Receive

All complaints/complaints will be recorded in the complaint register report by officers assigned to each level (See flow chart Figure 1), with the following description:
1. Delivered directly or indirectly, if Done Register
2. If Clarification is Incomplete to the Whistle-blower

3. If outside the project, it will be forwarded to the relevant agency
4. Execution time: maximum of three working days
5. Output: reports are accepted, rejected/returned regarding the suitability of subjects and objects.

Although no response is required for anonymous grievances, these will be recorded and reported with other grievances to facilitate continuous improvement.

3.1.2 Grievance Screening and Categorization

Each complaint will be screened from the problem, the definition of which is provided in the table below, along with the corresponding response in table 3.1, defined as follows:

Table 3.1 Screening of complaint categories

CATEGORY	PROBLEMS/COMPLAINTS	MANAGEMENT APPROACH
Land and territory issues	Covers all issues related to land and border administration areas	Complaints/complaints submitted at the village level will be resolved soon. Unresolved disputes will be forwarded to the district level through the relevant agencies.
Related to sector	Covers all issues related to the sector or institutional authority (OPD) at the district/provincial level.	Complaints/complaints are handled based on the existing FGRM from each relevant agency at the district or provincial level.
J-SLMP implementation (fiduciary and safeguards)	Covers all issues related to the fiduciary aspects of the project, including financial management, procurement, environmental permits, and safeguards issues.	Complaints/complaints will be handled by the relevant institutional authorities at each level with supervision and coordination from the SEKDA and/or BAPPEDA and the Directorate General of Civil Aviation.

3.1.3 Acknowledgment Receipt and Follow-Up Action

Complainants will receive a receipt for the complaint(s) submitted to the authorities. Each receipt has a specific number that can be monitored/tracked. In addition, complainants will be provided with an explanation about follow-up actions/processes. Complaint resolution will be based on the existing institutional mechanisms for each sector.

3.1.4 Refer to Relevant Authorities

Registered complaints will be submitted to the unit/section authorized to handle complaints. With support from provincial environmental and social specialists, Safeguard committees at district and provincial levels will assist in monitoring the resolution of complaints, including tracking the settlement process. Complex problems that cannot be resolved at the village/community and district levels will be sent to the provincial and national authorities.

3.1.5 Reviewing and Investigation

Following complaint dispatch, each complaint must be reviewed within 14 (Fourteen) working days and investigated as necessary. The officer and/or team in charge of investigating complaints may request verification and/or additional information to determine the scope of investigations and if additional follow-ups are required. Such investigation and/or follow-ups may involve site visits, document review, and meetings with competent and/or authorized parties to solve the issues under investigation. Periodically, the complainant must be informed whether:

- Additional consultation is needed to respond to a complaint.
- Further materials are needed to enable proper investigation.

The investigation findings will be used to document the decision-making process and inform proposed improvements. In the event of a deadlock, independent mediation will be sought. The investigation timeline will vary from case to case depending on the complexity of the problem. Whistle-blowers will receive regular notifications at least monthly on the status of the investigation if the issue has not been resolved within one month after the start of the investigation process.

Each complaint will be reviewed based on the object of the complaint/complaint, verified, and then the results will be formulated through the following procedure:

- The officer will review the complaint based on the object of the complaint/complaint to explore the problem of the complaint.
- If the complaint is outside the tupoksi area of KPH, TN, it will be transferred to the relevant OPD for implementing JSLMP (Distance, Disbun) both at the provincial and district/city levels. The agency/opd receiving the delegation will complete the verification process.
- If the complaint is in the KPH/TN area, it will be followed up by conducting field verification, sampling, photos, and/or videos of field findings.
- The Complaint Handling Team reports the results of the verification submitted by the relevant agency for further processing with the conclusion that the complaint is True or the objection is Not True.
- Execution time: maximum of three working days
- Output: Letter of recommendation for follow-up

3.1.6 Responding

The official team will follow up on investigated complaints. Any proposed settlement will be consulted with the aggrieved party to reach a win-win solution for all parties by the applicable laws and regulations. The safeguards committee will continue tracking the complaint/grievance resolution status with support from environmental and social experts. Based on the recommendation letter, the following steps will be taken:

1. If the complaint is proven/found other violations by the competent authority
2. If the complaint is not confirmed, then the complaint management is declared complete.
3. Informing the results of complaint management to the complainant
4. Execution time: maximum of three working days
5. Output: a). Decision letter for settlement of complaints; B). Notification of complaint management results to the complainant.

3.1.7 Closure

The agreed action(s) will be implemented if the applicant accepts the proposed resolution. The grievance officer is responsible for ensuring the implementation of the coordinated action(s) by relevant parties, including the agreed timeline for implementing the resolution. This process will be recorded in the grievance notes/database with supporting documentation. If necessary, regular monitoring will be performed to verify the implementation.

Following the resolution, the grievance can be officially closed. This process involves having the complainants sign the settlement form to document their satisfaction with the resolution action, documenting the action taken, and closing the case in the grievance registry.

3.2 FGRM Channels

Current channels
The program has provided where the communities and other stakeholders can submit complaints. Under the MoEF, complaints can be made through the website https://pengaduan.menlhk.go.id and managed by the Directorate General of Environmental and Forestry Law Enforcement (Ditjen PHLHK or Ditjen GAKKUM) which KLHK has mandated to handle complaints related to ERP at the national level.
- Telephone   : 021-5733940
- WhatsApp   : 0811 1043 994
- Letter or direct visit to KLHK office at: Gedung Manggala Wanabakti Blok 1 Lantai 1 Kementerian Lingkungan Hidup dan Kehutanan Jl. Gatot Subroto No.2, RT.1/RW.3, Senayan, Kecamatan Tanah Abang, Kota Jakarta Pusat, Daerah Khusus Ibukota Jakarta 10270

Under the Sub-Nasional PMU BioCF ISFL, alamat: Jl. Rm Noor Admadibrata No.1, Telanaipura, Jambi City, Jambi.

And also, the complaint can deliver to the relevans OPDs such as, Organisasi perangkat Daerah, Nemely: Bappeda Provinsi Jambi, Dinas Kehutanan Provinsi Jambi, Dinas Perkebunan Provinsi Jambi, Dinas Tanaman Pangan dan Hortikultura Provinsi Jambi, Dinas Lingkungan Hidup Provinsi Jambi.

Under the Provincial level. Dinas Lingkungan Hidup Provinsi Jambi, Bidang Safeguard.
- Telpon   : (0741) 40706

- DLH Center WhatsApp's (WA) DLH call center complaint Number: +62 82371912068.
- A letter or direct visit to KLHK office at   : Jl. H. Agus Salim No.7, Paal Lima, Kec. Kota Baru, Kota Jambi, Jambi 36129 Indonesia.

Project-specific FGRM channels may be established during project implementation in addition to the above channels. Information on the available FGRM channels and procedures for filing complaints and how such complaints will be processed shall be provided in an accessible format.

The method used results from a network agreement with the main stakeholders in implementing J-SLMP: the Provincial Plantation Office. Jambi; Department of Food Crops, Horticulture and Livestock Prov. Jambi; BAPPEDA Prov. Jambi; DLH Prov. Jambi; SN-PMU and National PMU.

Stakeholders can submit complaints, either directly or indirectly (representatives), in several ways:
- Face-to-face meetings (can be represented by credible institutions such as village facilitators);
- Electronic Facilities; By telephone; social media; Submission to the project web page.
- Complaint Subject
- The subjects here are stakeholders who can file complaints: Villages/Indigenous Institutions; Communities/Community Groups/Other Community Institutions; Companies (BMUD, BUMN, and Private); Government (Not project implementer).

The Complaints Hierarchy Complaint Handling The hierarchy here refers to the level/level/level of the complaint handling process based on the current hierarchy of the Indonesian government. To be more efficient and effective, three levels of management units were created, namely:
1. Level 1 is the site administratively located within the Regency/City area. At this level, the complaint management unit is the KPHP, the National Park, and the City/District Environmental Service.
2. Level 2, advanced complaint management, is administratively located in the province. At this level, the management unit is under the SN-PMU with the Provincial DLH Coordinator and is handled by the Security Section.
3. Level 3 is the highest level on a national scale. At this level, the management unit is under the Ministry of Environment and Forestry (Ditjen PK), with the MPI coordinator, and implemented by the safeguards team and SIS-REDD+.
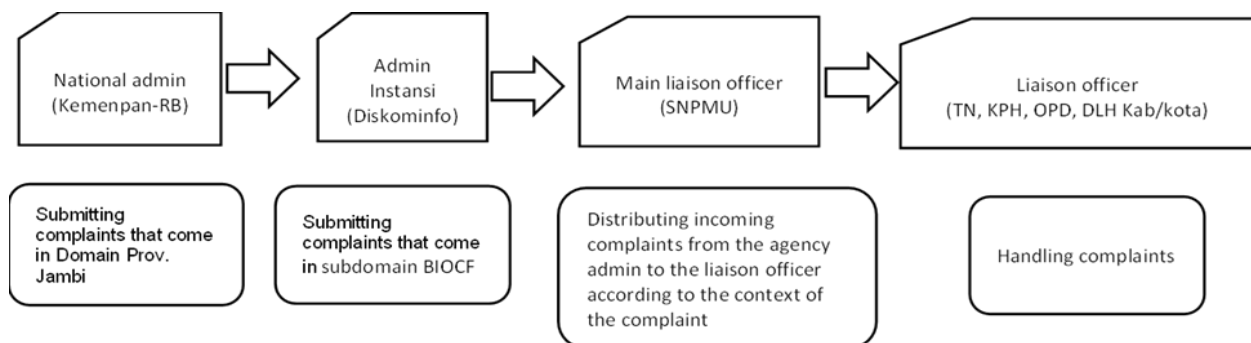
Web-based channel

To expand the complaint channel, it is done by synchronizing of the Biocf-ISFL complaint system with the internet-based national complaint system (website) with the National Public Service Complaint Management System (SP4N) - People's Aspirations and Online Complaints Service (LAPOR!) hereinafter referred to as SP4N-LAPOR! is a service for delivering all aspirations and public complaints that are integrated nationally with the website access page www.lapor.go.id.

LAPOR! has been established as the National Public Service Complaint Management System (SP4N) based on Presidential Regulation Number 76 of 2013 and Minister of State Apparatus Empowerment and Bureaucratic Reform Regulation (Kemenpan-RB) Number 3 of 2015. SP4N - LAPOR! formed to realize the "no wrong door policy" which guarantees the right of the community so that complaints from anywhere and of any type will be channeled to public service providers who are authorized to handle them. The purpose of SP4N is to: 1. Operators can manage complaints from the public in a simple, fast, precise, complete and well-coordinated manner; 2. Operators provide access to public participation in submitting complaints; and 3. Improving the quality of public services.

Services for submitting all aspirations and complaints of the people online which are integrated in the management of online complaints in stages at every public service provider. Since 27-10-2020 it has been designated as a general application in the field of managing public service complaints based on the Kemenpan-RB no. 680 th 2020. With the enactment of SP4N-REPORT! as a general application, all agencies are required to use SP4N-LAPOR! in managing public service complaints.

FGRM development in the SP4N-LAPOR system! carried out in the JAMBI PROVINCE Domain which was specifically developed into a BIOCF-ISFL sub-domain. Meanwhile, to access it, you can go directly to the lapor.go.id website or through the biocf.jambiprov.go.id website and then choose the COMPLAINTS feature. The implementation of the BioCF-ISFL FGRM follows the governance system and institutional structure contained in SP4N-LAPOR!. This institutional arrangement was developed in accordance with the development of thematic sub-domains built on the J-SLMP project in the BIOCF-ISFL program. To facilitate the disposition of the report categories, a main liaison officer (SNPMU) will be assigned. In order to facilitate access for reporting parties, the institutional system that manages the BioCF-ISFL FGRM is arranged as follows:

Complaint monitoring and tracking: The specific responsible/PIC function at the agency level will review the qualitative and quantitative indicators internally and externally within their institution and externally with other relevant stakeholder groups. This PIC will conduct a quarterly review

of the quantitative indicators and report periodically (quarterly) to the safeguard committee and the provincial environmental and social.

3.3 Evaluations and Supervision

The implementation of FGRM will review internal and external qualitative and quantitative indicators. Such review will be undertaken internally within the Program management and consulted externally with appropriate stakeholder groups, including community representatives. This periodic monitoring and evaluation process will be led by the SN-Program Management Unit and Safeguard Team every semester (six-monthly).

The Provincial Communication and Information Agency will conduct a quarterly review of quantitative indicators and report them to monthly management team meetings for the program. The indicators used in the monitoring and evaluation of FGRM here are how many complaints were received, how many were handled, how many could be followed up, how many cases were completed and how many were not completed during the reporting period (quarterly)

CHAPTER 4. CONSULTATIONS AND PUBLICATION OF REDRESS GUIDELINES AND PROCEDURE

Several consultations on FGRM procedures have been carried out with the following stakeholders:

Table 5.1. Summary of Stakeholder Consultations in Jambi

THEME	WHAT IS THE PROBLEM	RELEVANCE WITH REDD+	RECOMMENDATION
Kick-Off Meeting Preparatory Mission with BioCF ISFL	PDO yield chain Annual Work Plan Purchase plan Draft Grant Agreement Memoire Maid ToR Individual Consultant Concept Notes	MAR, Safeguards and ERP preliminary design	
BioCF-ISFL Joint Mission	PPG procurement, Lol, Financial agreement progress, AWP ERP Documents Yield chain & pre-investment activities Agricultural framework Private sector ER allocation Benefit Sharing Mechanism Security	Part of the REDD+ readiness process	The mission agreed that further refinement of the results framework and monitoring arrangements with interactive follow-up sessions and email communications with M&E specialists will take place over the next four months and will be presented to the next mission.
Focus group discussion (FGD) identification of potential locations for deforestation and forest degradation and peat damage (1)	Identification of REDD+ Implementation Areas Deforestation and degradation	As a document that supports the preparation of ERP	The SEA presentation stated that currently required program design for the Biocarbon Fund ISFL, and how to describe the causes/triggers & strategies for dealing with them; The current obstacles to implementing the Jambi ERP include procedurally, the issuance of a decree involving SKPD elements (provincial agencies); Data used for ERP, at least the last 10 years; There are data and maps that tend to be different, even though the data (both) are sourced from Government agencies; In KPH/National Park/Tahura/BPHP Units, in general the problems that occur are the expansion of community forest encroachment, forest fires, illegal logging, plantations without permits (oil & rubber), plantation investors (non-local Jambi), forest encroachment for coconut oil palm and rubber, encroachment in buffer zones between zones, lack of implementation of good

			governance from various relevant stakeholders, tenure conflicts, peat decomposition, illegal mining, land use (mining, plantations, agriculture), unsustainable forest management; Agency mapping for data availability is in accordance with the required basic data (Power Point attached slide-13), from the basic data it can be redeveloped according to the development of the discussion and deliberative process; Pre-identification of the main drivers causing problems in the forestry sector (attached-xl), will be met by the audience again according to the plan for further discussion.
Focus group discussion (FGD) identification of potential locations for deforestation and forest degradation and peat damage (2)	Identification of REDD+ Implementation Areas Deforestation and degradation	Verification of Main Drivers & Causes of Deforestation and Degradation SESA Problem Screening Identification of Social & Environmental Impacts PDO and ERP Consolidation Identification of Public Consultation Area	Participants complete information on the main causes and reasons behind Deforestation and Degradation, with supporting data; Participants convey information on the social and environmental impacts of the issues that arise, along with the direction of the program plans needed, this input can strengthen the PDO and the details of the program activities details on the participant slides; According to the preliminary information from the previous info recap and filtering support from spatial data processing, some issues have been addressed; In the process of ensuring that the problem on the second day is obtained a short list of agreed problems is seven points; Based on cluster issues that emerged from participant discussions, several alternative locations for public consultations were proposed, further screening could be arranged according to the basic considerations of spatial data processing and expert judgment.
Interviews of key stakeholder perceptions in the sample districts (Bungo, Merangin, Sarolangun, Kerinci and Tanjung Jabung Timur)	Interviews regarding the Bio Carbon Fund, drivers of deforestation, relevant stakeholders, fund management mechanisms, key issues and future expectations.	Verify Main Driver & DD Cause SESA Problem Screening	More than half of the respondents expressed ignorance about the details of the emission reduction program, its relevance to REDD+, and its role in the implementation process later. However, most stakeholders hope that the program can be implemented at the local level at the district level, so that the benefits of the program and sub-programs can be directly felt by the relevant units in the field in dealing with the current dynamics. .

CHAPTER 5. DISCLOSURE

The agreed action(s) will be implemented if the applicant accepts the proposed resolution. The grievance officer is responsible for ensuring the implementation of the coordinated action(s) by relevant parties, including the agreed timeline for implementing the resolution. This process will be recorded in the grievance notes/database with supporting documentation. If necessary, regular monitoring will be performed to verify the implementation.

Following the resolution, the grievance can be officially closed. This process involves having the complainants sign the settlement form to document their satisfaction with the resolution action, documenting the action taken, and closing the case in the grievance registry.