

**MANAGEMENT RESPONSE TO THE
REQUEST FOR INSPECTION PANEL REVIEW OF THE
DEMOCRATIC REPUBLIC OF CONGO: HIGH PRIORITY REOPENING AND
MAINTENANCE OF ROADS (“PROROUTES”) PROJECT (P153836)**

Management has reviewed the Request for Inspection of the Democratic Republic of Congo: High Priority Reopening and Maintenance of Roads (“ProRoutes”) Project (P153836), received by the Inspection Panel on August 3, 2017 and registered on September 13, 2017 (RQ17/05). Management has prepared the following response.

October 20, 2017

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Annex 1. Claims and Responses

ABBREVIATIONS AND ACRONYMS

DRC	Democratic Republic of Congo
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
GBV	Gender-based Violence (also referred to as SGBV, Sexual and Gender-based Violence)
GRM	Grievance Redress Mechanism
GRS	World Bank Grievance Redress Service
ID	Identification
IDA	International Development Association
IPN	Inspection Panel
IPP	Indigenous Peoples Plan
MONUSCO	United Nations Organization Stabilization Mission in the DRC
NGO	Nongovernmental Organization
PIU	Project Implementation Unit
RAP	Resettlement Action Plan
RN2	National Road 2
UN	United Nations

EXECUTIVE SUMMARY

Project Background and Inspection Panel Request

i. The High-Priority Roads Reopening and Maintenance Project (Pro-Routes or Project) aims to re-establish access between provincial capitals, districts and territories in several priority areas in the Democratic Republic of Congo (DRC), bringing connectivity to one of the poorest and most conflict-ridden areas in the world. The Project, which started in 2008, has rehabilitated 2,300 kilometers of high priority national roads throughout the country to date. The Project will contribute to socio-economic growth and poverty reduction in the DRC by directly reducing vehicle operating and travel time costs.

ii. The Project is being implemented an extremely challenging fragile and conflict-affected development environment. Challenges include entrenched and violent ethnic conflicts; the proliferation and presence of foreign and Congolese armed rebel groups, which frequently carry out assaults on the Project area; and widespread gender-based violence (GBV). Works on the Project have been suspended several times due to attacks by armed groups along the Project road. The security situation is significantly affecting the Bank's ability to access the Project area for supervision; Bank teams frequently are not able to travel on site. This situation has also kept many qualified contractors from bidding on the works, and impaired the Project's ability to attract an international nongovernmental organization to support the environmental and social components of the Project.

iii. In fragile and conflict-affected situations, project workers, worksites and equipment often require security protection to enable project implementation. In the Project area, which has been destabilized by war, civil strife and criminal activity for more than two decades, contractors frequently require protection from armed rebel groups. While the Bank had agreed with the Government that it would address security conditions in the Project area, the Contractor had unilaterally made his own supplemental security arrangements by hiring military personnel to provide security to the worksites. The Bank was not notified of this arrangement as the subcontract did not require the Bank's no-objection.

iv. On September 13, 2017, the Bank's Inspection Panel registered a Request for Inspection submitted by two individuals. The Request for Inspection includes allegations regarding adverse impacts on livelihoods through occupation of a quarry which one of the Requesters operates, and excessive use of force by military personnel deployed to provide security services to the Contractor. The Request further alleges violence against the community, including GBV; the employment of young boys as day laborers; and harm to the property of indigenous communities.

Management's Response

v. **Management has carefully reviewed the claims raised in the Request and takes the allegations very seriously. Management acknowledges that the Requesters had sent two emails informing the Bank of these claims and these should have received an immediate response.** However, once it received the complaint from the Inspection Panel, Management immediately sent a team to investigate the issues and made every effort to prompt the Borrower to provide remedies where noncompliance with its obligations under the Project's legal agreements, including relevant safeguard instruments, could be identified.

vi. **The first mission to the Project site, led by Global Practice Management with expertise from Washington and the Kinshasa office, took place between August 28 to 31, 2017; a second mission was conducted September 19 to 23, 2017, and a third mission October 11 to 13, 2017.** These missions included safeguard staff and highly qualified and experienced social development specialists trained in methodologies to assess GBV and familiar with the local context and language. This approach reflects the lessons and experience Management gained through the Uganda Transport Sector Development Project (TSDP).

vii. **Insights gained through the missions indicated that a key element of the Request appeared to be a commercial dispute between the Contractor and one Requester who operates a quarry.** In the course of this commercial dispute, the Contractor allegedly resorted to physical violence, using military personnel, to seize construction materials without paying for them. The Bank reported its findings to the relevant law enforcement authorities for their follow-up action in relation to any associated unlawful behavior. This dispute has since been resolved and the quarry operator has been compensated. Management pursued several actions with the Borrower agencies that implement the Project. Given the importance of the issues, Management also reached out to the Contractor and Requester in an effort to help the Borrower identify ways to remedy this unacceptable incident and put in place measures to prevent any recurrence.

viii. **Management takes particularly seriously the allegations regarding GBV, child labor and harm to indigenous communities. However, it has not yet been able to substantiate any of these claims, despite deployment of the specifically trained social development specialists noted above.** Management followed the protocols and lessons that have emerged from experience, including from the Uganda TSDP, and immediately sent Practice Management-led missions to the site, supported by staff with highly specialized skills and expertise in these areas. Despite numerous meetings and requests for more specific information, including by female experts on GBV in a safe and sensitive environment, the Requesters have not provided any specific or relevant information which the Bank could follow up on. Allegations have remained general, making it difficult for Management to validate these claims or to have them addressed by the appropriate parties. It is important to note that GBV and other human rights abuses are common in post-conflict Eastern DRC. In this case, it has been difficult to ascertain any link to the Project for the above-cited reasons.

ix. Management remains vigilant and will continue its due diligence. Management is working with the relevant authorities to facilitate their adequate investigation of and response to the issues raised by the Requesters. Management will also continue to partner with civil society organizations to monitor all allegation of abuse, violence and sub-standard working conditions related to the Project. Management will continue its safeguard due diligence, monitor the Borrower's compliance with its obligations under the Project, support the Borrower's efforts to ensure the compliance of the Contractor with its contractual obligations and the Bank's safeguard policies, and promptly take corrective measures where needed.

x. Management became aware during Project implementation that the Contractor had arranged for military personnel to provide security to the Project site. Management had initially agreed with the Borrower that it was the responsibility of the Government to ensure security conditions in the Project area so that contractors could operate safely. The Contractor decided to go beyond this general agreement and directly negotiated ad hoc arrangements with the Congolese army (the Army) for the assignment of military personnel to provide security to the worksites. The Bank was not consulted or notified about the Contractor's arrangements with the military. Management understands that while there may have been no alternative to this security arrangement, robust mitigation measures are required to manage social risks that could emerge from such situations. These were not anticipated at Project preparation and are being put in place now.

I. INTRODUCTION

1. A Request for Inspection concerning the Democratic Republic of Congo: High Priority Reopening and Maintenance of Roads Project (“ProRoutes” or Project) (P153836), financed by the International Development Association (the Bank), hereafter referred to as “the Request,” was received by the Inspection Panel on August 3, 2017 and registered on September 13, 2017 (RQ 17/05).

2. *Structure of the Text.* The document contains the following sections: Section II outlines the Request; Section III provides background information on the Project; Section IV discusses special issues; Section V presents Management’s responses to the Request; and Section VI contains the conclusion. Annex 1 presents the Requesters’ claims, together with Management’s detailed responses, in table form

II. THE REQUEST

3. The Request for Inspection was submitted by two individuals living in and near Goma, North Kivu Province, who are connected to a quarry exploited by the Contractor. Attached to the Request are emails from the Requesters to the Inspection Panel. The Requesters have asked that their identity be kept confidential (hereafter referred to as the “Requesters”). One of the Requesters had previously contacted the Bank directly by email, and is therefore known to Management. Management has communicated directly with this Requester in the course of its investigation related to the concerns raised.

4. The Request includes allegations regarding negative impacts on livelihoods through occupation by the Contractor of a quarry the Requesters operate; excessive use of force by military personnel deployed to provide security services to the Contractor, as well as violence against the community, including gender-based violence (GBV); the employment of young boys as day laborers; and harm to property of indigenous communities.

5. Prior to the Request, Management had received two emails from the Requesters, one on April 4 and one on June 29, 2017. The first email raised the incident at the quarry (see paragraph 30) and allegations of GBV allegedly committed during the incident. The second email focused on the commercial dispute about the quarry and indicated that the abuses raised earlier had been taken up by the military court in Goma. It did not specifically mention any Bank project or Bank involvement, nor did it make any reference to the first email. Both emails were overlooked by Bank staff but should have triggered an immediate response.

6. After the Inspection Panel informed Management that it had received a complaint on August 3, 2017, Bank staff contacted the Requester who had sent the earlier emails. In

that conversation, the Requester informed the Bank of allegations of violence associated with the unlawful exploitation of his quarry by the Contractor.

7. A Bank mission to Kivu was dispatched August 28-31, 2017 to investigate and address the allegations raised in the emails and during the phone conversation with one of the Requesters. The Bank team held extensive meetings with him on August 29. At that time, he raised concerns related to the incident at the quarry, including the allegation that a woman was assaulted during the incident. No other allegations were raised at that time.

8. Management later learned that the Requester had raised a second set of allegations with the Panel before he met with the Bank during this mission. Despite having already raised these concerns with the Panel, he did not share them with the Bank team during this mission, but only mentioned them when the Bank team followed up on them in subsequent conversations. This second set of allegations related to: (i) cases of GBV in the broader community committed by Contractor staff and military personnel deployed to provide security services to the Contractor; (ii) child labor; and (iii) harm to Indigenous Peoples communities, including alleged desecration of graves.

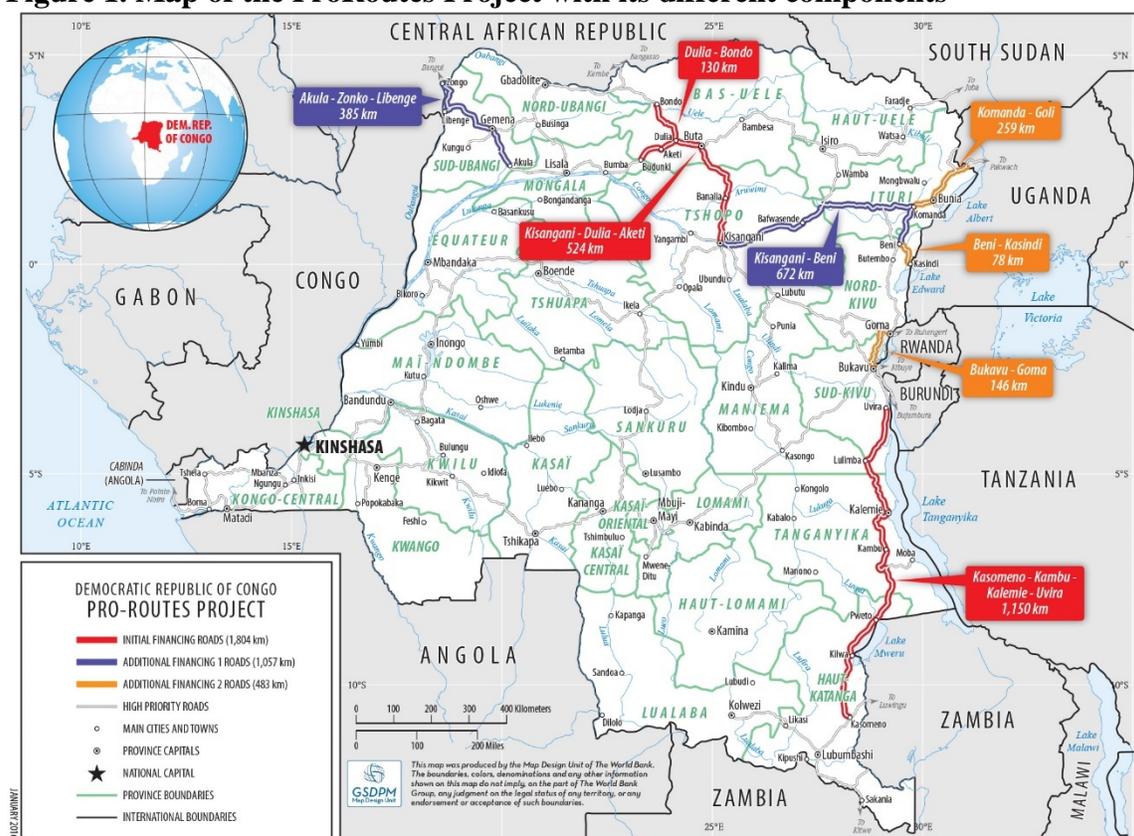
9. Both during and after the first mission, the Requester demanded, orally and in writing, to be given employment under the Project and/or payment for his “investigative services” in connection with the complaint. Bank Management has not agreed to these demands.

III. PROJECT BACKGROUND

10. **The Project.** The High-Priority Roads Reopening and Maintenance Project (Pro-Routes) (the “Project”) in the Democratic Republic of Congo (DRC) is supported by a total IDA amount of US\$238 million. This includes an IDA grant of US\$50 million equivalent approved by the Board on March 18, 2008. A first additional financing in the amount of US\$63.3 million equivalent was approved in June 2011 to scale up Project activities. On February 18, 2016, a second additional financing in the amount of US\$125 million equivalent was approved to support further Project activities.

11. The Project is supervised by a senior transport specialist with ten years’ experience working in DRC, based in Kinshasa. Major works contracts are visited on at least a yearly basis, due to security restrictions on travel to the worksites. Project-level arrangements to provide additional supervision elements are described further below (see paragraph 16). The Project is categorized “A” for its potential environmental and social impacts. To date the Project has rehabilitated 2,300 kilometers of high priority national roads reconnecting previously isolated cities and provinces—contributing to stability and security in a post-conflict context. Figure 1 provides a map of the overall Project with its components.

Figure 1. Map of the ProRoutes Project with its different components



12. **Project objectives.** The Project's development objective is to re-establish lasting access between provincial capitals and districts and territories in the Project impact area in a way that is sustainable for people and the natural environment.

13. **Project components.** The Project has four components: (a) Road Reopening and Maintenance; (b) Institution Building; (c) an Environmental and Social Program, and (d) Monitoring and Evaluation. The second additional financing provides funding for maintenance of roads re-opened under the original Project and the reopening of the following three new road sections: (i) the Komanda-Bunia-Goli road; (ii) the Beni-Kasindi road; and (iii) the Bukavu-Goma road (about 146 kilometers, see Figure 2), linking the North and South Kivu regions (this is the segment to which the Request pertains). In addition, two road sections for which construction was delayed will be re-opened: the Dulia-Bondo road and the Akula-Gemena-Libenge-Zongo road. The second additional financing also provides funding for reform of the Ministry of Infrastructure and Public Works and the extension of the environmental and social program to additional road segments. The implementing agency for the Project is the *Cellule Infrastructures* (infrastructure unit) at the Ministry.

Figure 2. Map of the Bukavu-Goma road segment



14. ***Project benefits.*** The Project will reduce travel time on a road that connects two important economic hubs in the region, Bukavu and Goma. Over the last two decades, the road was frequently impassable due to militia activity and poor conditions. People were obliged to use expensive and often unsafe boats on Lake Kivu to travel between the two towns. The Project therefore aims to contribute to socio-economic growth and poverty reduction in the DRC by directly reducing vehicle operating and travel time costs. The Bukavu-Goma road is also a strategically important corridor for national security and peace in Kivu, and the Project is expected to contribute to stability and security in the post-conflict context of Kivu.

15. ***Safeguard assessment and documents.*** An Environmental and Social Management Framework, an Indigenous Peoples Framework, and a Resettlement Policy Framework were prepared for the parent project and disclosed in country and in the InfoShop at the Bank between September 2007 and June 2008. These safeguard instruments were later updated for the second additional financing in October 2015. Since then, site-specific Environmental and Social Impact Assessments (ESIAs), Indigenous Peoples Plans (IPPs), and Resettlement Action Plans (RAPs) were prepared for the Komanda-Bunia-Mahugu road segment of the Project (August 2015), the Beni-Kasindi road segment (August 2015), and the Bukavu-Goma road segment (February and March 2017).¹ The site-specific ESIA includes procedures for protecting cultural heritage, including burials. Project also provides for a Grievance Redress Mechanism (GRM) to receive and address complaints. The GRM has not been fully implemented for the Bukavu-Goma road segment. Management is working with the Project Implementation Unit (PIU) to complete the GRM and ensure that it is put into operation. Specifically, 24 committees have been established (5 in North Kivu and 19 in South Kivu), including 8 that oversee the overall grievance system and 16 local committees.

16. ***There is little in-country capacity for safeguards. To mitigate this, the Project has put in place a range of measures to manage safeguard issues at the Project level.*** Supervision of safeguard mitigation measures is carried out through the following mechanisms: (a) safeguards specialist retained by the Contractor for day-to-day supervision and reporting on implementation of the Environmental and Social Management Plan (ESMP); (b) an environmental and social management firm (including an anthropologist dedicated to the implementation of the IPP) for monthly supervision in close coordination with the supervision engineer; (c) staff from the Ministry of Environment and the Project environmental unit of the PIU for periodic supervision; and (d) an Environmental and Social Advisory Panel for independent oversight of the implementation of environmental and social activities. The implementation of the respective safeguard instruments is the responsibility of the PIU, which has environmental specialists with Bank policy experience on staff. Quarterly progress reports (12 to date) on environmental and social safeguard management are prepared by the environmental and social management firm. ***Despite these Project level arrangements, significant weaknesses in safeguard supervision and reporting at the institutional level remain. The***

¹ Safeguard documents for the Bukavu-Goma road segment were prepared later than those for other road segments because the security situation did not allow an assessment to be carried out at this Project site. They were disclosed and consulted on according to Bank policy requirements.

Project initially intended to task an international nongovernmental organization (NGO) with the implementation of the environmental and social aspects of the Project, but no international NGOs expressed interest, and eventually a consulting firm was hired.

17. ***With regard to its benefits for Indigenous Peoples, the Project has been described as “good practice.”*** The Bank Information Center, an NGO, produced a case study of the ProRoutes project in November 2015, which concluded that the Project was a “best practice” in environmental and social safeguard management, and that the World Bank would benefit from replicating the ProRoutes approach elsewhere, in similar contexts. The acquisition of more than 5,000 hectares of land for the *Batwa* people (“Pygmies”), through negotiations with local Bantu communities and following the provisions of the Bank’s Involuntary Resettlement Policy, is one of the key social achievements of the Project. Another illustrative example of social inclusion by ProRoutes was the incorporation (in 2015) of 80 young *Mayi-Mayi* warriors² into the workforce of the Contractor of another ProRoutes’ financed contract, which constituted a contribution to peace in Eastern DRC.

18. ***This Project was prepared before the Uganda Transport Sector Development Project (TSDP) Inspection Panel case and hence did not benefit from the enhanced attention to GBV risks that has occurred subsequent to that case.*** Safeguards and other documentation prepared for the Project did not include specific and focused measures to mitigate risks and impacts from GBV in the area or specifically from the use of military personnel for securing Project sites. However, contractual obligations for contractors did include provisions against GBV and other violence. Management is working with the PIU to update and strengthen the relevant safeguard instruments to address GBV, further strengthen the GRM, and review the existing safeguard arrangements to reflect lessons from the Uganda TSDP. The Bank is also actively supporting GBV policies in DRC, including in the area relevant to the Request, through support to the Goma and Bukavu hospitals under the Great Lakes Emergency Women’s Health Project (P147489).

IV. SPECIAL ISSUES

19. ***ProRoutes provides critical development assistance in a conflict-affected area.*** The following paragraphs provide contextual information about the Project area to illustrate the challenges of implementing and supervising projects in such conflict-affected areas. Both implementation of the Project works and supervision missions by Bank staff had to be temporarily suspended at several points in the past due to significant security concerns, which remain a major challenge to date.

20. ***Lack of effective governance.*** State institutions in Eastern DRC face significant challenges in providing essential public functions and services. Years of conflict have contributed to the destruction of infrastructure and facilities, and continued insecurity and lack of access impedes the deployment of (and oversight over) trained and professional civil servants beyond provincial capitals. The poor state of road and communications

² These are community-based militias formed to defend local communities against other armed groups, such as gangs, rival factions, mercenaries, etc.

infrastructure renders many areas inaccessible to law enforcement institutions, allowing armed groups to operate with impunity.

21. ***Gender-based violence. The prevalence and intensity of all forms of sexual violence in the eastern provinces of the DRC have been described as the worst in the world.***³ Gender inequalities are profound in DRC, which ranks 148th of 157 countries in the Gender-Related Development Index. High gender inequality, identified as one of the factors underpinning systematic war-time sexual and gender based violence (SGBV), mirrors the existing challenges for women, including high maternal mortality, and limited empowerment and access to economic opportunities. There is also growing concern that SGBV, once associated primarily with the abuse by militias and mercenaries, has “metastasized into a wider social phenomenon.”⁴ According to the 2010 Demographic and Health Survey, over 50 percent of women in DRC have experienced physical violence, and 32 percent have experienced sexual violence committed by their partner over the last 12 months.⁵ Survivors often lack access to basic health services that address the physical and mental consequences of violence and displacement, due to disruptions in provision of medical services. Moreover, survivors often facing stigma and rejection by spouses, families and communities.

22. ***Use of security and military personnel. In fragile and conflict-affected situations, securing and protecting project worksites, workers, and equipment can be essential to allowing a project to be implemented.*** The Project area is located in North and South Kivu provinces, an area that has been destabilized by war, civil strife and criminal activity for more than two decades. The highly volatile security situation in South Kivu represents a significant challenge for the implementation of civil works in the area.

23. ***Foreign and Congolese armed groups have continued to proliferate and operate in Eastern DRC.*** In many areas, they exercise *de facto* territorial control, including over important mining areas and economic corridors. Despite the demobilization and reintegration of ex-combatants in 2009, these have partly regrouped and new militias have emerged. Since 1998, over 5.4 million people are estimated to have been killed in this conflict,⁶ while millions of others have been plunged into a state of acute vulnerability due to displacement, dispossession, the breakdown of communal and social bonds, and the loss of livelihoods.

24. ***Security challenges are illustrated by the most recent raids of armed rebel groups in the Project area on September 27 and October 1, which led to the temporary suspension of works.*** The attacks occurred on several villages located along the road,⁷ with multiple gunfire exchanges and damages to the communities. Works had to be suspended on October 11-12 again due to a separate rebel attack on the village of Shasha. Because of the deteriorated security conditions, Bank teams have not been authorized to travel to the

³ By many authors, as well as the United Nations Special Representative on sexual violence in conflict at a meeting of the United Nations Security Council in April 2010.

⁴ J. Gettleman, New York Times: “Rape Epidemic Raises Trauma of Congo War,” Oct. 7, 2007.

⁵ Measure DHS, Demographic Health Survey, Democratic Republic of Congo, 2010.

⁶ International Rescue Committee.

⁷ Including the villages of Uvira, Baraka, Mako bola, Mboko, Swima, Kalundu and Munene.

field in South Kivu since the September 27 events. The third Bank mission (October 11–13) had to stay in Goma and in Sake where the Contractor’s base is located (North Kivu).

25. ***Management became aware during implementation that the Contractor had unilaterally made additional security arrangements with the Congolese army (the Army) to have military personnel provide security to the Project site.*** Management had initially agreed with the Borrower that it was the responsibility of the Government to ensure security conditions in the Project area so that contractors could operate safely. The Contractor decided to go beyond this general agreement and negotiated ad hoc arrangements with the Army for the assignment of dedicated military personnel to provide security to the worksites. Consultations with the Deputy Special Representative of the United Nations (UN) Secretary General for Operations and Rule of Law based in Goma have confirmed that there are no alternatives to the use of armed security forces in that area. Since private security contractors are not allowed to carry weapons under Congolese law and police forces do not have the capacity and resources to handle these security challenges adequately, the Army remains the only available option to provide such services.

26. ***The Bank was not consulted or notified of this arrangement since the subcontracting arrangements by the Contractor do not require the Borrower to seek a non-objection from the Bank.*** Management did not anticipate at Project preparation the potential impacts from the Contractor’s own security arrangements, and hence no specific mitigation measures were put in place. The *ad hoc* agreement between the Contractor and the Army to use military personnel for providing security to the Project has now been formalized through a subcontracting arrangement between the Contractor and the Army, which will enable proper management and mitigation of the associated risks through contractual provisions, which require training, a code of conduct, a security strategy and monitoring.

27. ***The fragile security situation poses additional challenges to Project preparation and implementation beyond the personal safety of Contractor staff and workers.*** Few contractors were willing to bid for road projects in DRC, especially not in the eastern provinces. Hence, very limited competition was observed in the selection process of the Contractor for the Bukavu-Goma road works, due to low interest from qualified contractors. This was also the case for implementation of the environmental and social aspects of the Project, which led to the hiring of a consulting firm rather than an international NGO, as noted earlier.

V. MANAGEMENT'S RESPONSE

28. ***Management has carefully reviewed the claims raised in the Request and takes the allegations very seriously.*** Management acknowledges that the Requesters had sent two emails informing the Bank of these claims and these should have received an immediate response. However, once it received the complaint from the Inspection Panel, Management immediately sent a team to investigate the issues and made every effort to prompt the Borrower to provide remedies where noncompliance with its obligations under the Project's legal agreements, including safeguard instruments, could be identified.

29. ***The first high-level mission to the Project site, led by Global Practice Management with expertise from Washington and the Kinshasa office, took place between August 28 to 31, 2017; a second mission was conducted September 19 to 23, 2017, and a third mission October 11 to 13, 2017.*** These missions included safeguard staff and highly qualified and experienced social development specialists specifically trained in methodologies to assess GBV and familiar with the local context and language. The mission teams interviewed a wide range of stakeholders, including members of Project-affected communities, members of indigenous communities in the area, civil society representatives, including those working on GBV, health specialists, staff employed by the contractor, PIU staff, and government officials. This approach reflects the lessons and experience Management gained through the Uganda TSDP.

30. ***Insights gained through these missions indicated that a main element of the Request appeared to be a commercial dispute between the Contractor and one Requester who operates a quarry.*** Management understands from both parties that a dispute about the agreed price and quantities of gravel and crushed stones to be supplied by the quarry had escalated and could not be resolved. In the course of this dispute the Contractor allegedly resorted to physical violence, using military personnel, to seize construction materials without paying for them. This dispute has since been resolved. Management pursued several actions with the Borrower agencies that implement the Project. Given the importance of the issues, Management also reached out to the Contractor and Requester in an effort to support the Borrower's efforts to remedy this unacceptable incident and put in place measures to prevent any recurrence. The Bank also reported its findings to the relevant law enforcement authorities for their follow-up action in relation to any associated unlawful behavior.

31. ***Management emphasized to the Borrower that it would need to ensure the Contractor paid the monies owed for the seized building materials and provided compensation for any harm or loss that the quarry operator had suffered from the Contractor's actions.*** Such compensation was paid on August 31, 2017 to the operator of the quarry. Management received confirmation in writing from the Requesters that they were satisfied with the outcome of the settlement.

32. ***Management recognizes that the Requesters have also made complaints that allege instances of GBV, child labor, and harm to indigenous communities, and it takes these allegations very seriously. However, Management has not yet been able to substantiate any of these claims, despite deployment of the specifically trained social***

development specialists. Management followed the protocols and lessons that have emerged from experience, including from the Uganda TSDP, and immediately sent Practice Management-led missions to the site, supported by staff with highly specialized skills and expertise in these areas. Despite numerous meetings and requests for more specific information, including by female experts on GBV in a safe and sensitive environment, the Requesters have not provided any specific or relevant information which the Bank could follow up on. ***Allegations have remained general, making it difficult for Management to validate these additional claims or to have them addressed by the appropriate parties.***

33. ***Management has agreed with the Borrower on an action plan that includes a comprehensive review and safeguard audit of all ongoing road works financed under the Project.***

34. ***Management has also taken action to remind all Bank operational staff and country offices about the importance of appropriately and immediately responding to complaints related to Bank-supported operations.*** In line with the pertaining Bank Procedure, complaints from project-affected people must be taken seriously and must be flagged quickly to the appropriate managers and the Bank's Grievance Redress Service (GRS). The Bank is also working with the PIU to strengthen the Project's multiple supervision and reporting mechanisms, including the Project's GRM, so that possible Project-related issues can be detected more rapidly.

Specific Issues Raised in the Request

Alleged Impacts from Military Personnel providing Security

35. ***Regarding the alleged violent incident at the Tongo-Butale quarry, the Bank insisted that the Borrower conduct a proper investigation through the relevant civil and military authorities.*** This is especially important since the exact circumstances and course of action of the conflict between the Contractor and the quarry operator remain unclear based on multiple interviews conducted by the Bank team during the August mission. However, as mentioned above, the Contractor and the quarry operator have agreed on a settlement, which was paid by the Contractor on August 31, 2017. The quarry operator subsequently withdrew the legal action he had initiated. Management has requested the PIU to retained local counsel to follow up on the settlement and the legal processes.

36. ***Management has become aware of other allegations of excessive use of force by military personnel deployed to provide security services to the Contractor, including some not raised in the Request.*** These include a gunshot wounding in response to an alleged theft, and a few allegations of threats and beatings of individuals who were suspected of theft by military personnel. The Bank has reported these allegations to the appropriate national authorities and requested further investigation so that victims can receive adequate support and perpetrators be punished. These incidents demonstrate the need for a proactive and robust management of the risks associated with deploying military personnel, specifically in a conflict-affected area.

37. ***As part of the action plan agreed with the PIU during the August mission, the Bank insisted that the Borrower require the Contractor to formalize its arrangements with the Army in a legal contract and prepare a strategy regarding the appropriate deployment and training of military personnel, including on the use of force and how these personnel interact with communities in the Project area.*** The Bank has agreed with the United Nations Organization Stabilization Mission in the DRC (MONUSCO) that UN specialists will screen and train the military personnel protecting the worksite, by end October 2017. The Bank also ensured that the Borrower required the Contractor to conclude a formal agreement with the Army, setting out the roles, responsibilities and obligations of the Army when providing security to the Project. The Bank has assisted the Borrower in reviewing the subcontracting agreement between the Contractor and the Army, with support from Bank corporate security, to ensure that it included, inter alia, provisions to address the risk of abuse or application of excessive and unauthorized violence. The subcontracting agreement has now been signed.

38. ***As a result of the security strategy, which assessed the required number, armament, and qualifications of such security staff, the number of military personnel deployed to the Bukavu-Goma worksite has been reduced from 14 to seven.*** The three military guards accused of the alleged abuses have been removed and are banned from future assignments protecting worksites.⁸ The remaining military personnel will receive screening and training from MONUSCO. The General Commander has been directly involved in the selection of the seven military personnel assigned to the worksites to confirm that they have an adequate profile and no previous history of abuses. In future rotations, military personnel are likely to come from the Military Police, which is a specialized and better-trained unit with experience interacting with local communities.

39. ***Management will take this opportunity to review its approach for dealing with military and security forces where they are required to secure and protect project sites in fragile and conflict-affected situations.*** The objective is to ensure that Bank-supported operations undertake the appropriate risk assessments and mitigation measures for such security arrangements.

Allegations of Gender-based Violence

40. ***Management takes allegations of GBV very seriously.*** In investigating this issue, Management applied the lessons drawn from the Uganda TSDP. Qualified and experienced female social specialists, trained in issues of GBV and attuned to the local social and cultural sensitivities, interviewed possible witnesses, community members and leaders, school teachers, and healthcare providers. During the September mission to the Project area, Bank staff heard allegations of two instances of GBV allegedly in relation to the Project, involving three potential victims under the age of 18. These allegations were made by three individuals (who were not the victims), but the allegations were not supported by others, and no victims could be identified.

⁸ The Contractor requested this ban in writing to the responsible military authorities. The PIU will check the list of military personnel employed on the worksites to ensure implementation of the ban.

41. ***The allegation that a woman was sexually assaulted during the incident at the quarry could not be substantiated.*** The Requester and the woman in question later explained to the Bank team that she was pushed and fell during the incident, but that she was not sexually assaulted.

42. ***GBV is common in the part of DRC in which the Project is located.*** In interviews at two hospitals in the area, which are supported by the Bank through the Great Lakes Emergency Women's Health Project (P147489) and are specialized in providing assistance to GBV victims, medical staff reported that they attend to 30–35 cases of GBV monthly at the hospitals. About 10 percent of these are likely to have been perpetrated by military personnel. However, the military personnel providing security to the Contractor wear work jackets that are different from those of other military units (displaying the Contractor's name) and were not identified as perpetrators by any victims. Allegations of GBV committed by military personnel deployed to provide security services to the Contractor were also not confirmed by other community members, community leaders, or school teachers. No allegations have been raised in connection with the Contractor or the military personnel deployed to provide security services to the Contractor at regular meetings that one of the hospitals holds with civil society representatives and other local and provincial stakeholders.

43. ***Management has also heard reports about four cases of sexual harassment of the Contractor's female staff from two local civil society organizations that were interviewed during the mission.*** Management will work with the Borrower authorities and the Contractor to investigate these reports and implement appropriate measures to address this risk going forward. This will include targeted and mandatory training for contractor staff, dissemination of information to workers on contractual obligations and sanctions as well as internal rules and code of conduct.⁹

44. ***Though Management has not been able to corroborate the allegations based on the due diligence it conducted during the recent missions undertaken to the Project area, Management will continue its efforts to investigate and will increase its due diligence in regard to any instances of GBV related to the Project.*** Management is also exploring how the Bank can support the prevention and mitigation of GBV in the Project area through this Project and/or other Bank operations such as the Great Lakes Emergency Women's Health Project.

Allegations of Child Labor

45. ***The Bank takes child labor issues very seriously and has a clear position to help reduce harmful child labor through its ongoing poverty reduction efforts.*** Management identified that the Contractor determines its workers' age through an ID check before they are hired. During the September mission, the Bank supported the Borrower's efforts to review the Contractor's labor registry, interview members and leaders of the community, and speak with a sample of children living in nearby local communities and a sample of

⁹ The contractual clauses as well as the Contractor's internal rules and code of conduct include specific sanctions in the case of sexual harassment: the first sanction is a warning to the perpetrator; subsequent instances may warrant legal action.

workers employed by the Contractor. The Bank team, the safeguard supervisor, and the supervision engineer conducted unannounced spot checks on worksites during both the August and September missions. The minimum age for work in DRC is 16 years of age. Three 17-year-olds were identified in the Contractor's labor registry.

46. ***Neither the Bank team, which included local qualified expertise on these issues, nor the supervision engineer or the safeguard supervisor could confirm any case of child labor in the Project.*** Management will continue its due diligence regarding child labor and will work with the Borrower to ensure compliance of the Contractor with its contractual obligations and the Bank's policies.

Alleged Impacts on Indigenous Communities

47. ***Management could not ascertain adverse impacts from the Project on Indigenous Peoples.*** None of the quarry and borrow pit owners belong to Indigenous Peoples' communities in the Project area. Based on multiple interviews with indigenous community members and leaders, the Bank has found no confirmation of the Requesters' allegations that *Batwa* people ("Pygmies") have been working in the Tongo-Butale quarry.

48. ***The two graves that were affected, one each on two separate quarry sites relating to the Project, do not belong to indigenous communities.*** Once the locations were identified as graves, the relevant authorities, community members, and quarry workers were informed, works were stopped, and the sites were secured to move remains to another grave. The PIU will follow up with the families to ensure that any concern related to possible damages to the graves or the need for funerary rituals is properly addressed.

Bank interviews with indigenous communities and relevant authorities did not indicate any issues regarding Indigenous Peoples. ProRoutes is, in fact, widely known for the positive impact of its Indigenous Peoples' activities.

Alleged Impacts on Livelihoods

49. ***Apart from the commercial dispute with the Requesters, other quarry owners and operators have not been adequately compensated for the exploitation of their quarries and borrow pits in a timely manner. This has now been rectified.*** Facilitated by the Bank team and the PIU, all outstanding compensation has been paid to the owners and operators of quarries and borrow pits exploited by the Contractor, and an audit has been commissioned to verify the payment.

50. ***Unrelated to the Request for Inspection, the assets of 76 additional Project-affected households have been identified as being indirectly affected by road works and other quarry and borrow pit exploitation, from a livelihoods perspective.*** Impacts are of a modest extent, with some agricultural losses due to the crop yield being affected by the quarry and borrow pit exploitation. Fifty-one of the additional households have already been compensated, the remaining 25 households will receive payment as soon as the security conditions allow for it. Twenty-seven households have been identified in association with 14 new borrowing pits and quarries which the Contractor is planning to exploit to advance with the road works. The Borrower undertook to ensure that the

Contractor would not move forward with the exploitation of these new quarries and borrowing pits until compensation has been fully paid to the affected households and all authorizations have been obtained. The Project's RAP is being updated to include these newly identified impacts and will be further updated if additional eligible complaints are registered through the Project-level GRM or other means.

Alleged Retaliation

51. ***Management takes the Requesters' claims of retaliation very seriously and raised the matter with the Government at the highest levels, emphasizing that the Bank does not condone any form of retaliation.*** This was communicated to national and local authorities, including the governors of the North and South Kivu provinces. Further, the Country Director has communicated this several times and in writing to the Minister of Infrastructure, who confirmed his commitment to preventing retaliation and pursuing the matter with the provincial governments. The issue was also raised by the Bank's Vice-President for Africa with the DRC Delegation during the 2017 World Bank Annual Meetings. On that occasion, the World Bank Governor for DRC confirmed the DRC authorities' commitment to preventing retaliation against complainants.

52. ***The Requester expressed the view that the government's decision to close the Tongo-Butale quarry constitutes retaliation. Based on a technical assessment undertaken by the PIU upon the Bank's request, however, in Management's view this closure is due to dangerous conditions regarding an adjacent electricity transmission tower and technically justified.*** This measure is necessary because the continued exploitation of the quarry would affect slope stability and cause the transmission tower to collapse. The Bank has asked the PIU to facilitate discussion with the quarry operator, to verify if consolidation works to stabilize the transmission tower could be performed and to evaluate whether the quarry owner would be eligible for any compensation for this closure.

53. ***Management's investigations, including face-to-face discussions with the concerned Requesters, have not garnered information that is sufficiently clear to substantiate other threats of retaliation.*** The information that has been received is conflicting.

54. ***Nevertheless, Management continues its due diligence and its investigation into the retaliation allegations. The Practice Manager responsible for the Project, together with other members of the Bank team, is in continuous contact with one of the Requesters and is following up on any concerns.***

Labor Conditions, Occupational Health and Safety

55. ***Instances of non-compliant labor and occupational safety conditions were observed by the Bank team. These were not part of the Request but were raised in consultations the Bank and the PIU held with the local community and civil society organizations. Issues include allegations that the Contractor was partially withholding wages, as well as Contractor staff engaging in physical or verbal abuse against Project workers.*** These issues had not come to the Bank's attention before the mission, partly

because the relevant GRM had not been fully set up. The Bank accordingly required the PIU to enforce the contract with the Contractor to ensure that such incidents are immediately stopped and investigated. A formal Notice to Correct was issued to the Contractor on October 2, 2017, instructing him to comply with the applicable rules and code of conduct. The notice further warns the Contractor that any proven case of serious non-compliance would lead to the suspension of works.

56. The Requesters' claims, accompanied by Management's detailed responses, are provided in Annex 1.

Actions

57. **Management has agreed on an action plan with the Borrower to quickly address concerns, including those raised in the Request.** Management will continue working with the relevant authorities to facilitate their adequate investigation of and response to the issues raised by the Requesters.

58. **Retaliation.** Management has firmly conveyed the Requesters' concerns regarding retaliation at the highest levels of Government, with an emphasis on the Bank's zero-tolerance position. Management will remain in regular contact with the Requesters to monitor the situation.

59. **Gender-based violence.** Given the widespread presence of GBV in the area in which the Project is located, Management is making intense efforts to ensure that the Project does not contribute to or exacerbate the risk of GBV,¹⁰ in close coordination with other Bank teams working on GBV in the area, including through the Great Lakes Emergency Women's Health Project. Additional GBV experts have been hired by the Bank and are scheduled to start on the ground by October 23, 2017. Additional targeted measures to address GBV in high-risk environments such as Eastern DRC will be developed as part of the Bank's GBV Action Plan, which is currently being prepared in response to the Report of the *Global Gender-Based Violence Task Force* that was commissioned by the Bank.¹¹

60. **Use of military personnel as security forces.** As there is no private sector alternative to using military forces as security personnel on this Project site, the Bank has reviewed the subcontracting agreement between the Contractor and the Army to ensure that it includes relevant provisions to address the risk of abuse and application of excessive and unauthorized violence. This agreement has now been signed and fewer and better trained military personnel have now started to protect the worksites on the ground. The Bank has agreed with MONUSCO that UN specialists will screen and train the military personnel protecting the worksite, by end of October 2017.

¹⁰ Contractual clauses related to GBV have been included in bidding documents and works contract.

¹¹ World Bank. 2017. Working together to prevent sexual exploitation and abuse: Recommendations for World Bank projects. Washington, D.C.: World Bank Group.
<https://hubs.worldbank.org/docs/ImageBank/Pages/DocProfile.aspx?nodeid=27739791>

61. **Contract compliance.** A formal Notice to Correct was issued on October 2, 2017 to the Contractor, instructing him to comply with the internal rules and code of conduct. The Bank emphasized to the Borrower the importance of compliance with the Bank's requirements. This includes ensuring that the Contractor restores compliance with its contractual obligations, including full payment of compensation to quarry owners, and confirmation that the situation of damaged graves is fully resolved. All compensation payments to quarry owners and operators have now been made and the site-specific ESMP is expected by the end of October 2017.

62. **Working conditions.** The Bank will work with the PIU to monitor working conditions on the worksites and compliance with contractual obligations, Bank requirements and national laws. Workers were trained on October 11-12, 2017 regarding the internal rules and code of conduct and the associated complaints mechanisms. The Notice to Correct warned the Contractor that serious non-compliance would lead to the immediate suspension of works. Enhanced monitoring and reporting instruments have been agreed with all supervision entities and the first reports are expected by the end October 2017.

63. **Safeguard documents.** The Project's safeguard documents will be revised immediately and strengthened to reflect the lessons learned from the Uganda TSDP case for projects in areas with high levels of GBV. The relevant safeguard documents will be updated to reflect issues that have been identified through the Bank's investigation of the allegations in the Request. In particular, the site-specific RAP was updated to include additional Project-affected parties that are eligible for compensation and is now being reviewed by the Bank. The updated ESIA is expected by October 25, 2017.

64. **Grievance redress.** The Bank team is working with the PIU to continue strengthening the implementation of the GRM, including completion of the GRM for the Bukavu-Goma road segment, an improved procedure for submitting grievances, and improved mechanisms to report complaints regarding security, conflict, and labor conditions. Twenty-four GRM committees have been established in all villages along the road (5 in North Kivu and 19 in South Kivu). A consolidated list of all complaints received and addressed by the GRM is expected by the end of October 2017.

65. **Project environmental and social compliance and governance audit.** The Bank will review the compliance with contractual obligations and Bank policy requirements of all active quarries and borrow pits in the Project. Further, the Bank will conduct an environmental and social compliance and governance audit of the Project. The auditor has been hired and started the review process. The audit report is expected by November 30, 2017.

VI. CONCLUSION

66. ***Management has carefully reviewed the claims raised in the Request and takes the allegations very seriously.*** Management is making every effort to investigate the issues and require the Borrower to provide remedy where noncompliance with Bank Policy could be identified. The Project is situated in a conflict-affected zone, which complicates review of the issues raised, and specifically ascertaining their relationship to the Project.

67. ***Based on the insight gained through the three missions in August, September, and October 2017, the main focus of the Request appears to be a commercial dispute between the Contractor and a quarry operator, which has since been fully resolved.*** Management has taken several actions with the Borrower to remedy this incident and put in place measures to prevent any recurrence. Management also reached out to the Contractor and the Requester given the importance of the issues. Management acknowledges that it had missed earlier emails from the Requesters in which they tried to raise concerns with Bank Management.

68. ***Management is very sensitive to the allegations of GBV, child labor, and harm to indigenous communities caused by the Project. Management has followed the protocols and lessons that emerged from experience, including the Uganda TSDP.*** Despite repeated meetings (employing female specialists on GBV) and requests to identify specific cases of alleged GBV, child labor, or harm to indigenous communities, the Requesters have not been able to provide any relevant and have kept their allegations quite general, making it difficult to substantiate claims and provide redress where appropriate and feasible.

69. ***Management remains vigilant and will continue its due diligence.*** Management will also continue to partner directly and indirectly with civil society organizations active in the area to monitor any allegation of abuse, violence or sub-standard working conditions. Management will continue its safeguard due diligence, monitor the Borrower's compliance with its obligations under the Project, support the Borrower's efforts to ensure the compliance of the Contractor with its contractual obligations and the Bank's safeguard policies, and promptly take corrective measures where needed.

ANNEX 1
CLAIMS AND RESPONSES

No.	Claim	Response
1.	<p><i>[From Request] We have been suffering from the harm caused by the World Bank's failure or omission to respect our rights, our dignity and ethics in connection with project INT COMM [redacted] PRO-ROUTES PROJECT for the rehabilitation and reopening of high-priority roads, implemented by a [redacted] linking the towns of Goma and Bukavu, situated in North Kivu and South Kivu provinces of the Democratic Republic of Congo.</i></p>	<p>A Bank mission led by the responsible Practice Manager and comprising qualified and experienced safeguard staff traveled to Kivu on August 28-31, 2017. The Bank met with the Requesters to discuss their concerns. The Bank agreed on an action plan with the Borrower, at the end of this Bank mission, to address the issues, including a comprehensive review and safeguard audit of other ongoing road works financed under the Project.</p> <p>A second Bank mission traveled again to Kivu on September 19-23, 2017 to assess progress in implementing the action plan, and to investigate the new allegations contained in the Notice of Registration. After the second mission, the Bank updated the action plan to reflect new findings and progress achieved to date.</p> <p>The Contractor has launched an internal investigation and informed the Bank that the Works Manager was removed for negligence and that monetary penalties have been imposed on him. Senior Managers from the Contractor's headquarters in Kinshasa have been relocated to Goma to reinforce Project management and ensure compliance with contractual obligations. The supervision engineer has also been strengthened at the PIU's request, with the addition of one part-time environmentalist and one part-time engineer specialized in quality management.</p> <p>A third mission was conducted October 11-13.</p> <p>The issues are described in more detail in the following items in this table.</p>
2.	<p>[From NoR] Livelihood impacts. The Requesters allege that the military armed forces used by the Project's contractor (FARDC, Forces Armées de la République Démocratique du Congo, is mentioned) have "<i>occupied our quarry, which is our source of income and our livelihood</i>" and, as a result, many people who worked in the quarry "<i>do not know how they will meet the needs of their families.</i>" They explained that construction materials were forcibly taken following "<i>torture, assault and battery, and physical violence, and compensation for the crops destroyed have not yet been paid.</i>" They claim that they had to flee their village following threats. The Requesters also explain that other community members' crops and medicinal herbs were destroyed by road works and they had not been compensated for these losses.</p> <p><i>[From Request] Since March 26, 2017, [redacted] implementing the project, has</i></p>	<p>One of the Requesters operates the Tongo-Butale quarry, which is located about 50 kilometers from Goma. This is the largest quarry exploited by the Contractor, with about 1,000 cubic meters of materials extracted between April and June 2017.</p> <p>After an informal agreement had been initially reached in March 2017 with the quarry operator regarding conditions of quarry exploitation, the Contractor claimed to have received authorization from the provincial authorities to exploit the quarry without payment. Consequently, in late March 2017, the Contractor began to exploit the quarry with no compensation paid to the operator. This caused a conflict between the Contractor and the quarry operator, with alleged verbal and physical abuse against the quarry operator and others by the military forces deployed to provide security to the Contractor. There may also have been three indirect victims of violence. Those victims have spoken with Bank staff and at least one claimed suffering mistreatment, but not GBV, by these military forces. Based on multiple interviews conducted by the Bank during the August mission, circumstances of the conflict remain unclear, including dates, nature of the alleged violence, and a possible threat or violence by one of the quarry operators, a former military commander, against the Contractor's staff and</p>

No.	Claim	Response
	<p><i>occupied our quarry, [redacted] which is our source of income and our livelihood. Our children's school fees have not been paid, our customers are threatening us. Following these threats we fled our village and have taken refuge in [redacted], internally displaced persons, refugees and demobilized military personnel who made their livelihood working in our quarry do not know how they will meet the needs of their families, which creates a risk of revolt, young people are at risk of being recruited by various armed groups. We fear that this could result in violence and killings in the village if nothing is done to pay for all the damage caused by this World Bank project.</i></p> <p><i>This World Bank project has not respected or complied with its commitments in respect of the rights of the local communities, nor has it respected international humanitarian law relating to the indigenous communities since it has forcibly seized the indigenous communities' resources, using for this purpose armed and uniformed military personnel.</i></p> <p><i>1st Email Attached</i></p> <p><i>From: [redacted]</i></p> <p><i>Sent: August 3, 2017</i></p> <p><i>To World Bank Staff</i></p> <p><i>Subject: Fw: [redacted] of the World Bank Kinshasa – Complaint against [redacted]</i></p> <p><i>FYI Correspondence without follow up that was sent to the World Bank</i></p> <p><i>DATE: 10.4.17</i></p> <p><i>From: [redacted]</i></p> <p><i>Subject: Complaint against [redacted]</i></p> <p><i>Hello [redacted] of the World Bank Kinshasa</i></p> <p><i>I am a member [redacted] and a company [redacted] financed by the World Bank it is a company that won the contract to rehabilitate the Sake Kavumu (Bukavu) road; we plead that this company pays for the construction</i></p>	<p>the military forces deployed to provide security services to the Contractor.</p> <p>During the August mission, the Bank found that the Contractor was in breach of contractual obligations to exploit quarries and borrow pits. Specifically, apart from the commercial dispute with the Requesters, other quarries and borrow pits were exploited without proper compensation being paid to the respective owners and operators and without the proper safeguard instruments and authorizations from the supervision engineer. The authorization obtained by the Contractor from provincial authorities was not sufficient to meet contractual obligations and fulfill the requirements of Bank policies. This authorization did, however, instruct the Contractor to pay compensation to quarry owners and operators. In a meeting on September 22, 2017, the South Kivu Provincial Minister of Mines told the Bank that all the quarries were illegal because they were located within the road's right-of-way. The Bank pointed out that the quarry operators were nevertheless eligible for compensation consistent with the Project's ESMP.</p> <p>The objective of the action plan agreed during the August 2017 mission was restoring full compliance of the Project with contractual obligations, particularly those of the Contractor. Facilitated by the Bank team and the PIU, compensation has been paid to the owners and operators of all quarries and borrow pits exploited by the Contractor, and an audit has been commissioned to verify the payment.</p> <p>Unrelated to the Request for Inspection, the assets of 76 additional Project-affected households have been identified as being indirectly affected by road works and other quarry and borrow pit exploitation, from a livelihoods perspective. Impacts are of a modest extent, with some agricultural losses due to the crop yield being affected by the quarry and borrow pit exploitation. Fifty-one of the additional households have already been compensated, the remaining 25 households will receive payment as soon as the security conditions allow for it. Twenty-seven households have been identified in association with 14 new borrowing pits and quarries which the Contractor is planning to exploit to advance with the road works. The Borrower undertook to ensure that the Contractor would not move forward with the exploitation of these new quarries and borrowing pits until compensation has been fully paid to the affected households and until all the authorizations have been obtained as per contractual obligations. The Project's RAP is being updated to include these newly identified impacts and will be further updated if additional eligible complaints are registered through the Project-level GRM or other means. Twenty-four GRM committees have been established in all villages along the road (5 in North Kivu and 19 in South Kivu). A consolidated list of all complaints received and addressed by the GRM is expected by the end of October 2017.</p> <p>Regarding the Tongo-Butale quarry, 90 percent of the compensation for exploiting the quarry was paid by the</p>

No.	Claim	Response
	<p><i>materials taken by force, following an agreement, and that it refuses to pay after having [not understood] or pursued by force, using people who were armed and appeared like FARDC [Armed Forces of DRC]; with cases of rape and other physical violence toward women and young girls of the village; we sought to contact you because this situation is now before the public prosecutor's office of [redacted]; these partners are vulnerable and don't have the means to defend themselves legally; your help is thus necessary to make a plea to the World Bank office in Kinshasa to put pressure on this company so that these vulnerable people can have their rights restored. Please provide us with the contact and email and telephone number of the World Bank office in Kinshasa.</i></p> <p><i>Signed [redacted]</i></p>	<p>Contractor to the quarry operator on August 31, 2017. The remaining 10 percent will be paid by November 30, 2017, as agreed between the quarry operator and the Contractor. The compensation covers direct and indirect income losses claimed by the quarry operator, including: the value of the materials extracted from the quarry, the value of the lost business commitments, the value of destroyed agricultural crops and medicinal herbs, and land value depreciation due to adverse environmental impacts.</p> <p>The Requester expressed the view that the government's recent decision to close the Tongo-Butale quarry constitutes retaliation. Based on a technical assessment undertaken by the PIU upon the Bank's request it is Management's view this closure is technically justified. This measure is necessary because the continued exploitation of the quarry would affect the slope stability and cause an adjacent transmission tower to collapse. The Bank asked the PIU to facilitate discussion with the quarry operator and to verify if consolidation works to stabilize the transmission tower could be performed and to evaluate whether the quarry operator would be eligible for any compensation for the closure of the quarry.</p> <p>Regarding the alleged violent incident at the Tongo-Butale quarry, the Bank insisted that the Borrower conduct a proper investigation through the relevant civil and military authorities. This is especially important since the exact circumstances and course of action of the conflict between the Contractor and the quarry operator remain unclear based on multiple interviews conducted by the Bank team during the August mission. However, the Contractor and the quarry owner have agreed on a settlement, which was paid by the Contractor on August 31, 2017. The quarry operator subsequently withdrew the legal action he had initiated. Management has requested the PIU to retain local counsel to follow up on the settlement and the legal processes. The local counsel has now been hired and is based in Goma.</p> <p>In fragile and conflict-affected situations, the need to secure and project worksites, workers, and equipment can be essential to allowing a project to be implemented. The Project area is located in North and South Kivu provinces, an area that has been destabilized by war, civil strife and criminal activity for more than two decades. The highly volatile security situation in South Kivu represents a significant challenge for the implementation of civil works in the area. Security challenges are illustrated by the most recent raids of armed rebel groups in the Project area on September 27 and October 1, which led to the temporary suspension of works. The attacks occurred on several villages located along the road, including the villages of Uvira, Baraka, Mako bola, Mboko, Swima, Kalundu and Munene, with multiple gunfire exchanges and damages to the communities. Works had to be suspended on October 11-12 again due to a separate rebel attack on the village of Shasha. Because of the deteriorated security conditions, Bank teams have not been authorized to travel to the field in South Kivu since the September 27 events.</p>

No.	Claim	Response
		<p>The third Bank mission (October 11–13) had to stay in Goma and in Sake where the Contractor’s base is located (North Kivu).</p> <p>Management became aware during implementation that the Contractor had unilaterally made additional arrangements with the Army to have military personnel provide security to the Project site. Management had initially agreed with the Borrower that it was the responsibility of the Government to ensure security conditions in the Project area so that contractors could operate safely. The Contractor decided to go beyond this general agreement and negotiated ad hoc arrangements with the Army for the assignment of dedicated military personnel to provide security to the worksites. Consultations with the Deputy Special Representative of the UN Secretary General for Operations and Rule of Law based in Goma have confirmed that there are no alternatives to the use of armed security forces in that area. Since private security contractors are not allowed to carry weapons under Congolese law and police forces do not have the capacity and resources to handle these security challenges adequately, the Army remains the only available option to provide such services.</p> <p>The Bank was not consulted or notified of this arrangement since the subcontracting arrangements by the Contractor do not require the Borrower to seek a non-objection from the Bank. Management did not anticipate at Project preparation the potential impacts from the Contractor’s own security arrangements, and hence no specific mitigation measures were put in place. The <i>ad hoc</i> agreement between the Contractor and the Army to use military personnel for providing security to the Project has now been formalized through a subcontracting arrangement between the Contractor and the Army, which will enable proper management and mitigation of the associated risks through contractual provisions, which require training, a code of conduct, a security strategy and monitoring.</p> <p>As part of the action plan agreed with the PIU during the August mission, the Bank insisted that the Borrower require the Contractor to formalize its arrangements with the Army in a legal contract and prepare a strategy regarding the appropriate deployment and training of military personnel, including on the use of force and how these personnel interact with communities in the Project area. The Bank has agreed with MONUSCO that UN specialists will screen and train the military personnel protecting the worksite, by end October 2017. The Bank also ensured that the Borrower required the Contractor to conclude a formal agreement with the Army, setting out the roles, responsibilities and obligations of the Army when providing security to the Project. The Bank has assisted the Borrower in reviewing the subcontracting agreement between the Contractor and the Army, with support from Bank corporate security, to ensure that it included, inter alia, provisions to address the risk of abuse or application of excessive and unauthorized violence. The subcontracting agreement has now been signed.</p>

No.	Claim	Response
		<p>The security strategy proposed to reduce the number of military personnel, and to assign them primarily to the Contractor’s base, where personnel and most valuable assets are stored. The contractual agreement requires that military personnel deployed to provide security services to the Contractor be appropriately trained and have no previous history of abuse and that they comply with the Contractor’s internal rules and code of conduct. Distinctive clothing and ID are to be provided to military personnel so that there is no confusion with other military forces present in the region.</p> <p>As a result of the security strategy, which assessed the required number, armament and qualifications of such security staff, the number of military personnel present on the Bukavu-Goma worksite has been reduced from 14 to seven. The three military guards accused of the alleged abuses have been removed, including the captain commanding the unit, and are banned from future assignments protecting worksites.¹ The remaining military personnel will receive screening and training from MONUSCO. The UN agreed to do the screening and to provide a specialized trainer. Screening and training are expected to be completed by October 6, 2017. The General Commander of the Congolese army in Northern Kivu has been directly involved in the selection of the seven military personnel assigned to the worksites to confirm that they have an adequate profile and no previous history of abuses. In future rotations, military personnel are likely to come from the Military Police, which is a specialized and better-trained unit with experience interacting with local communities.</p> <p>One of the Requesters also claimed that they had to flee their village following threats of violence and retaliation. The Bank team did not find any evidence of this although Management takes this seriously and has repeatedly raised the issue of non-retaliation with the authorities.</p> <p>During the September mission, the Bank met with the Requesters, who stated that although there had been some tensions with the supervision engineer, they did not fear retaliation. While maintaining the confidentiality of the Requesters’ identity during its September 22nd meeting with provincial authorities, the Bank reiterated its request that no retaliation be exerted against the Requesters. Local authorities, including both governors of the North and South Kivu provinces, reassured the Bank that any form of retaliation against complainants would not be tolerated.</p> <p>Management takes these claims very seriously and raised the matter with the Government at the highest levels, emphasizing that the Bank does not condone any form of retaliation. The Country Director has communicated several times and in writing to the Minister of Infrastructure, who confirmed his commitment to preventing retaliation and pursuing the matter with the</p>

¹ The Contractor requested this ban in writing to the responsible military authorities. The PIU will check the list of military personnel employed on the worksites to ensure implementation of the ban.

No.	Claim	Response
		<p>provincial governments. The issue was also raised on October 12, 2017 during the bilateral meeting between the AFR Vice-President and the DRC Delegation during the 2017 World Bank Annual Meetings. On that occasion, the World Bank Governor for DRC confirmed the DRC authorities' commitment to preventing retaliation against complainants.</p> <p>Management's investigations, including face-to-face discussions with the concerned Requesters, have not garnered information that is sufficiently clear to substantiate other threats of retaliation. The information that has been received is conflicting.</p> <p>Nevertheless, Management continues its due diligence and its investigation into the retaliation allegations. The Practice Manager responsible for the Project, together with other members of the Bank team, is in continuous contact with one of the Requesters and is following up on any concerns.</p>
3.	<p>[From NoR] Violence (including gender-based). The Requesters claim that there has been violence against the community and instances of sexual violence against women and girls due to Project activities. They also allege "human rights violations" specifically citing a case of a community member who was shot by the armed forces used by the contractor.</p> <p><i>[from 1st email] with cases of rape and other physical violence toward women and young girls of the village;</i></p> <p><i>2nd email attached: August 27, 2017</i></p> <p><i>From: [redacted]</i></p> <p><i>To: [redacted]; WB staff members</i></p> <p><i>Subject: Re: Meeting with the Inspection Panel – ProRoutes Project</i></p> <p><i>Hello [name of WB staff], I apologize, I was [redacted] but also we would like if you could speak with a victim who is at the hospital in [redacted] qui has hit by bullets in the left thigh, the situation has become more and more worrisome [redacted] your intervention is so urgent and important to stop the hemorrhaging. We now include people wounded by guns, minor girls who have been raped who are paying the price of the rehabilitation of a dirt road 145 [kilometers] long, that is good for one agricultural season in this century, especially financed by a great institution like the World Bank. Meeting this Monday</i></p>	<p>The Bank was informed on September 14, 2017 that the Requesters' complaint included allegations of multiple cases of GBV against young girls living in neighboring communities.</p> <p>In investigating this issue, Management applied the lessons drawn from the Inspection Panel case on the Uganda TSDP. Qualified and experienced female social specialists, trained in issues of GBV and attuned to the local social and cultural sensitivities, interviewed alleged victims, community members and leaders, school teachers, and healthcare providers.</p> <p>The August 2017 mission did not identify any allegation of GBV through the interviews conducted by the Bank team, including 29 interviews with community women by experienced and qualified female Bank social specialists speaking the local language and trained in conducting such sensitive interviews (drawing on the lessons learned after the Uganda TSDP case). Some cases of GBV have been reported in the North and South Kivu provinces during the period of armed conflict, which was before the start of the Project.</p> <p>During the September mission, the Bank met the Requester who mentioned that there were multiple GBV cases associated with the Project but also said that cases were very difficult to confirm and that he could not provide any names of victims, or any other relevant information.</p> <p>The Bank performed additional investigations and interviews, with Bank staff supported by 4 men and women speaking the local language and who had been trained by the Bank social team in the specific sensitivities required for such investigations. Around 40 individual interviews were conducted, and meetings were also held with civil society representatives and community leaders. While most interviewees had no knowledge of any occurrence of GBV associated with the Project, three people interviewed by the Bank's social specialists mentioned having heard of the case of two young girls being assaulted by one or several military guard(s) deployed to provide security services to the Contractor. One of the girls was allegedly raped and the other physically assaulted. No specific details were provided.</p>

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	<p><i>by phone. We [redacted] our safety is becoming very limited if nothing is done on your part we fear the worst. Do you know a certain [redacted] World Bank Kinshasa? [redacted].</i></p> <p><i>[from 3rd email] there have been a lot of cases of sexual violence due to the project activities at the quarry... Concerning the shooting, it was rather a man called [redacted] who was brought down and is at the hospital in [redacted].</i></p>	<p>The Bank visited the school attended by the alleged victims, as well as local health centers where the alleged victims would have received some care. Teachers had no knowledge of any such cases, nor had they received any information about them through the information system linking all schools in the region. According to the consultations and visits conducted by the Bank, the alleged cases also were not registered by any local health center or hospitals. The Bank could not identify the two girls through the interviews and visits to schools and health facilities.</p> <p>Another case concerned a 16-year old girl who allegedly became pregnant after having relations with a Chinese employee of the Contractor was also mentioned in one of the Bank’s interviews. Other interviewees, however, mentioned that the pregnancy occurred in the context of a relationship with a community boy. The Bank could not identify the victim, who has reportedly left the village.</p> <p>The Bureau d’Études spécialisées en Gestion Environnementale et Sociale (BEGES), which is responsible for implementing the environmental and social management measures of the Project, visited the Panzi hospital in Bukavu. The Panzi hospital maintains a database of the particulars of all GBV cases occurring in the South Kivu province that have been registered through local health centers and clinics.</p> <p>Consultations with the GBV unit of the Heal Africa hospital in Goma were also conducted by the Bank on September 22 and 23, 2017.</p> <p>In interviews at two hospitals in the area, which are supported by the Bank through the Great Lakes Emergency Women’s Health Project (P147489) and are specialized in providing assistance to GBV victims, medical staff reported that they attend to 30–35 cases of GBV monthly at the hospitals. In many cases, victims cannot or do not want to report their aggressor to the police. However, when the aggressor is identified, most victims do wish to file a legal complaint and the Heal Africa hospital provides legal assistance for that.</p> <p>About 10 percent of these are likely to have been perpetrated by military personnel. However, the military personnel providing security to the Contractor wear work jackets that are different from those of other military units (displaying the Contractor’s name) and were not identified as perpetrators by any of the victims. Allegations of GBV committed by military personnel deployed to provide security services to the Contractor were also not confirmed by other community members, community leaders, or school teachers.</p> <p>The Goma Heal Africa hospital holds monthly meetings with civil society representatives, human rights activists and other partners and officials during which no mention of GBV cases linked to the Contractor have been raised. BEGES also interviewed the Special Police for Childhood Protection based in Goma who had received no indication of a GBV case linked to</p>

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		<p>the Contractor or the military personnel deployed to provide security services to the Contractor.</p> <p>Management has become aware of allegations of excessive use of force by military personnel deployed to provide security services to the Contractor, including some not raised in the Request. These include a young man accused of stealing gasoline who was shot in the leg by one of the Contractor's military guards. Circumstances of the shooting remain unclear, with the military guard claiming it was an accident and the victim's family denying that he was stealing gasoline. A settlement was reached in September 2017 between the Contractor and the injured man to compensate him for the harm and to cover medical expenses. On September 21, 2017, the Bank met with the victim, who has now left the hospital and who confirmed having received the compensation. The Bank asked the PIU to immediately report to the Bank any allegation of physical violence, using whenever appropriate the recently reinforced GRM system.</p> <p>A few allegations of threats and beatings of individuals who were suspected of theft by military personnel were also heard. The Bank has reported these allegations to the appropriate national authorities and requested further investigation so that victims can receive adequate support and perpetrators be punished. These incidents demonstrate the need for a proactive and robust management of the risks associated with deploying military personnel, specifically in a conflict-affected area.</p> <p>Management will monitor implementation of the agreed action plan to mitigate the risks of abuse. The GRM has been considerably strengthened with an increase from 3 to 24 community committees – in all villages located along the road – in order to receive and report on any claims of possible abuse or contractual violations.</p> <p>This Project was prepared before the Uganda Transport Sector Development Project (TSDP) Inspection Panel case and hence did not benefit from the enhanced attention to GBV risks that has occurred subsequent to that case. Safeguards and other documentation prepared for the Project did not include specific and focused measures to mitigate risks and impacts from GBV in the area or specifically from the use of military personnel for securing Project sites. However, contractual obligations for contractors did include provisions against GBV and other violence. Management is also working with the PIU to update and strengthen the relevant safeguard instruments to address GBV, further strengthen the GRM, and review the existing safeguard arrangements to reflect lessons from the Uganda TSDP. The Bank is also actively supporting GBV policies in DRC, including in the area relevant to the Request, through support to the Goma and Bukavu hospitals under the Great Lakes Emergency Women's Health Project (P147489).</p>
4.	<p>Labor issues. The Requesters stated that young boys were employed by the contractor as daily laborers, and that</p>	<p>During the September mission, the Bank met with the Requesters, who said that there were cases of child labor associated with the Project, while noting that cases were very</p>

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	<p>part of their salaries was confiscated by the contractor.</p> <p><i>[from 3rd email] following which many youths less than 18 years of age have been hired as day workers, but also the [redacted] have confiscated 20% of their pay in exploiting them abusively.</i></p>	<p>difficult to confirm and that they could not provide any names of victims.</p> <p>As part of its review Management identified that the Contractor determines its workers' age through an ID check before they are hired. During the September mission, the Bank supported the Borrower's efforts to review the Contractor's labor registry, interview members and leaders of the community, and speak with a sample of children living in nearby local communities and a sample of workers employed by the Contractor. The Bank team, the safeguard supervisor, and the supervision engineer conducted unannounced spot checks on worksites during both the August and September missions. The minimum age to work in DRC is 16 years of age. Three 17-year olds were identified in the labor registry. All other workers are above 18.</p> <p>Neither the Bank team, which included local qualified expertise on these issues, nor the supervision engineer or the safeguard supervisor were able to confirm any case of child labor in the Project. Management will continue its due diligence regarding child labor and will work with the Borrower to ensure compliance with the Contractor's contractual obligations and the Bank's policies.</p> <p>Instances of non-compliant labor and occupational safety conditions were observed by the Bank team. These were not part of the Request but were raised in consultations the Bank and the PIU held with the local community and civil society organizations. Issues include allegations that the Contractor was partially withholding wages, as well as Contractor staff engaging in physical or verbal abuse against Project workers. These issues had not come to the Bank's attention before the mission, partly because the relevant GRM had not been fully set up. The Bank also heard allegations that an excessively unfavorable exchange rate was applied by the Contractor when paying employees (contracts are generally in dollars but payment is made in local currency based on the daily exchange rate).</p> <p>The Bank accordingly required the PIU to enforce the contract with the Contractor to ensure that such incidents are immediately stopped and investigated. A formal Notice to Correct was issued to the Contractor on October 2, 2017, instructing him to comply with the applicable rules and code of conduct. The notice further warns the Contractor that any proven case of serious non-compliance would lead to the suspension of works. The Bank emphasized to the Borrower the importance of compliance with the Bank's requirements. This includes ensuring that that the Contractor restores compliance with its contractual obligations, including full payment of compensation to quarry owners, and confirmation that the situation of damaged graves is fully resolved.</p> <p>The Bank also requested that the Contractor's safeguards specialist as well as the supervision engineer and BEGES be used as reliable and confidential ombudspersons for any labor issues, that the internal rules and code of conduct be amended to</p>

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		<p>include their contact information, and that information about the grievance process be disseminated to all workers through training. The Bank also requested that the internal rules and code of conduct be translated in French, Chinese and local language and be displayed in all of the Contractor's facilities.</p> <p>A compliance auditor has been hired and started a review of, among other issues, all labor and occupational, health and safety issues, including child labor. The audit report is expected by November 30, 2017.</p> <p>The Bank has requested the PIU to significantly strengthen the Project's multiple supervision and reporting mechanisms to capture and report to the Bank on any potential cases of child labor or other serious labor or occupational safety issues.</p> <p>The Bank will work with the PIU to monitor working conditions on the worksites and compliance with contractual obligations, Bank requirements and national laws.</p>
5.	<p>[From NoR] Indigenous Peoples impacts. The Requesters contended that the Project <i>“has forcibly seized the indigenous communities’ resources, using armed and uniformed military personnel.”</i> They also alleged the desecration of Pygmies’ graves by the Project.</p> <p><i>3rd email attached: August 29, 2017</i></p> <p><i>From: [redacted]</i></p> <p><i>To: [redacted]; WB staff members</i></p> <p><i>Subject: Re: Meeting with the Inspection Panel – ProRoutes Project</i></p> <p><i>Hello [name of WB staff] [redacted]</i></p> <p><i>Concerning the Pygmies, they are affected negatively because their means of existence have been destroyed by the project, because it is Pygmy women who work in the quarry that has been militarily occupied by the [redacted] of [redacted] there have been a lot of cases of sexual violence due to the project activities at the quarry following which many youths less than 18 years of age have been hired as day workers, but also the [redacted] have confiscated 20% of their pay in exploiting them abusively. A family complained that [redacted] had destroyed their field of food crops, such as manioc, beans... and some commercial agriculture, coffee, quinine and fruit trees without consulting the family or obtaining their agreement, the</i></p>	<p><i>Management could not ascertain adverse impacts from the Project on Indigenous Peoples.</i> None of the quarry and borrow pit owners belong to Indigenous Peoples’ communities in the Project area. Based on multiple interviews with Indigenous Peoples community members and leaders, the Bank has found no confirmation of the Requesters’ allegations that Batwa people (“Pygmies”) have been working in the Tongo-Butale quarry. A local resident stated that he hires Indigenous Peoples to work in his quarry—this is the only instance where such practice was reported to the Bank.</p> <p>In the Bank’s September 22, 2017 meeting with the South Kivu Provincial Minister of Agriculture, Land Issues and Rural Development who is a well-known Indigenous Peoples leader and activist. The minister did not convey any concerns about possible harm caused by the Project to Indigenous Peoples’ communities.</p> <p>ProRoutes is in fact known for the extent and positive impact of its Indigenous Peoples’ activities. The acquisition of more than 5,000 hectares of land for the Batwa people, through negotiations with local Bantu communities and following the provisions of the Bank’s Involuntary Resettlement Policy, is one of the key social achievements of the Project.</p> <p>An IPP was prepared in March 2017 to support Indigenous Peoples communities in the Kivu provinces under the Bank Project. The IPP is under implementation with some delays due to the unstable security situation in the area and some processing delays in disbursement of funds. Four of the activities planned in the IPP are completed: (i) establishment of autonomous Indigenous Peoples Associations for the coordination and management of Project activities – six local committees and 24 associations have been legally registered (three of those associations were visited during the PIU’s last mission to Goma in September 2017); (ii) securing land for Indigenous Peoples’ concessions and agriculture; and (iii) promotion of the traditional know-how and practices of Indigenous Peoples along the RN2</p>

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	<p><i>same family saw the tombs of their grandparents destroyed, they saw [redacted] the bones of their grandparents and other family scattered along the road. Concerning the shooting, it was rather a man called [redacted] who was brought down and is at the hospital in [redacted]. Concerning the reprisals, [redacted] in fact in short these threats</i></p>	<p>(Bukavu-Goma segment). Twenty matrons (traditional birth attendants) were trained with regard to childbirth hygiene and now act as community liaisons in three health centers. Moreover, 20 craftsmen were also trained in technical and organizational capacity to manage income-generating activities.</p> <p>The Bank did find evidence that at least two graves had been affected by the Project's works but these graves do not belong to Indigenous Peoples' families. Once the locations were identified as graves, the relevant authorities, community members, and quarry workers were informed, work was stopped, and the site was secured.</p> <p>In one case, while exploiting one of the borrow pits, the Contractor realized that a grave was being excavated. This was witnessed by at least one individual in the community. The Bank was informed that the Contractor restored the grave and stopped digging in the area. Bones were reportedly put back in the grave. There is no evidence that bones were "scattered along the road," and in interviews with those in the community, no particular complaint was raised.</p> <p>The second grave was discovered by the Contractor in another borrow pit but works were stopped before the grave was significantly affected. The Bank met with the family owning the grave which did not have any complaint about what had happened.</p> <p>The Bank requested that the PIU follow up with the families to ensure that any concern related to possible damages to the graves or the need for funerary rituals is properly addressed.</p> <p>The Bank visited all the quarries and borrow pits exploited by the Contractor and found no other cases of affected graves.</p>
6.	<p><i>[From Request] We have complained by email to the staff of the World Bank Office in Kinshasa, DRC, to the implementing partners [redacted] but we [redacted] have also [redacted], we have contacted the local authorities, including the [redacted].</i></p> <p><i>We consider the response we have received to be inadequate. It does not solve our problems for the following reasons: the bills for the construction materials forcibly taken following macabre scenes of torture, assault and battery, and physical violence, and compensation for the crops destroyed have not yet been paid.</i></p>	<p>The Bank received two emails from the Requesters on April 4 and June 29, 2017. The first email raised the incident at the quarry and allegations of GBV allegedly committed during the incident. The second email focused on the commercial dispute about the quarry and indicated that the abuses raised earlier had been taken up by the military court in Goma. It did not specifically mention any Bank project or Bank involvement, nor did it make any reference to the first email. Both emails were overlooked by Bank staff but should have been immediately responded to.</p> <p>Management has taken action to remind all Bank operational staff and country offices about the importance of appropriately and immediately responding to complaints related to Bank-supported operations. In line with the pertaining Bank Procedure, complaints from project-affected people must be taken seriously and must be flagged quickly to the appropriate managers and the Bank's Grievance Redress Service (GRS).</p> <p>The Bank visited the Bukavu-Goma road in March 2016 when the Project's second Additional Financing was just starting and no physical work had been performed on the ground. Major works contracts are now visited on at least a yearly basis, due to security</p>

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		<p>restrictions on travel to the worksites. The Project is supervised by a senior transport specialist with ten years' experience working in DRC, who is based in Kinshasa.</p> <p>As part of the action plan prepared after the August mission, the Bank is working with the PIU to strengthen the Project's multiple supervision and reporting mechanisms, including the Project's GRM, so that possible Project-related issues can be detected more rapidly. The GRM has now been considerably strengthened and expanded, from 3 to 24 committees established (5 in North Kivu and 19 in South Kivu), including 8 that oversee the overall grievance system and 16 local committees. All villages located along the road now have a committee in place and the first complaint (related to a car accident) was registered. Information about the GRM's existence was disseminated through public information sessions facilitated by BEGES, as well as through local radio announcements. The Bank asked the PIU and BEGES to ensure that all complaints received earlier, before the GRM was fully active, now be registered and addressed through the GRM.</p> <p>The compliance auditor also will look closely at the Project's environmental and social governance to propose possible additional measures to strengthen supervision and reporting.</p> <p>As part of the action plan agreed in August 2017, the Bank has requested that all progress and supervision reports be amended to include a specific section on potential risks related to security and conflict, as well as a separate section on labor issues and occupational safety.</p>