

6.0 LAND ACQUISITION AND PAYMENT OF COMPENSATION PROCESS

6.1 INTRODUCTION

More than 90 percent of land needed by COTCO for Project construction will be placed in a "Land Easement." In a few cases land, will be used through a "Temporary Authorization to Occupy the Land" process as described in Section 3.3.2. Land within the boundaries of official concessions granted by the Republic of Cameroon may also be used. Use and compensation of concession lands will be through a negotiated process.

This Section describes the compensation process for land to be acquired for the Land Easement. It also describes grievance processes to be implemented during various stages of Project implementation, the process to be used for payment of community compensation, and a change management process.

6.2 UNIQUE NATURE OF THE EVALUATION AND PAYMENT OF COMPENSATION TO MEET THE INTENT OF WORLD BANK DIRECTIVES FOR THE CAMEROON TRANSPORTATION SYSTEM

Construction of the Cameroon Transportation System is unique in that the standard for compensation as required by the World Bank is different from that normally applied under Cameroon law. As discussed in this Plan, the Project will meet the intent of World Bank Operational directives relating to compensation.

In the following parts of this Section, the land acquisition and compensation process is explained. The process under which land is expropriated or acquired through eviction, and the terms under which compensation is paid are well defined under Cameroon Law. The dual process described here is a unique process specific to construction of the Cameroon Transportation System and will not be the basis of future compensation efforts by the Republic of Cameroon.

COTCO has agreed to pay supplemental compensation as described in Section 5.0 to individuals whose land use is directly affected by the Project. The supplemental compensation COTCO is responsible for is limited to that described in this Plan and is defined in general terms as the difference between compensation required under Cameroonian legislation and compensation to meet the intent of World Bank Operational directives.

The concept of supplemental compensation includes the necessity of being flexible for the following reasons:

- It covers a range of resources which people use, and will not be limited to the resources normally compensated under Cameroonian legislation.

- It requires assessment of market or replacement values and is not limited to payment using only fixed rate sheets.
- It requires consultation with the affected population.
- It includes a choice between cash and/or in-kind payment.
- It may be implemented during a longer period of time.
- It includes a change process.

Compensation will be paid as follows:

- Republic of Cameroon Payment of compensation will be made in cash.
- COTCO Payment of compensation will be made in cash and/or in-kind.

The following Section describes the Project's compensation process. Although the Republic of Cameroon and COTCO at times have different roles and responsibilities in the compensation process, the major steps and the interactions of both entities with individuals being compensated will occur at the same time.

Simply stated, the expropriation and eviction process and supplemental compensation process are as follows:

Collection of land use information during the Centerline Survey (CLS)	During the CLS, the following information was collected: <ul style="list-style-type: none"> • Identity of each owner/user of land within the proposed Land Easement, and • An inventory (including drawings and photos) of resources by owner/user for which compensation will be paid. This information was in addition to the necessary engineering information needed.
Request for and Declaration of a Public Purpose (DPP)	The DPP is an order made by the Minister in Charge of Lands (MINUH) of the Republic of Cameroon to initiate the land acquisition and compensation process required under Cameroon legislation.
Land owners/users identified, public inquiries held, compensable resources identified	A Verification and Valuation Commission (VVC) is established by the Republic of Cameroon to review land information, identify owners/users, hold public inquiries, determine compensation due, and make recommendations concerning expropriation and eviction as per applicable Cameroon legislation. COTCO will determine the compensation based on information collected during the CLS. Changes in supplemental compensation will be made where appropriate, based on: <ul style="list-style-type: none"> • Consideration of information provided by the VVC, and • Changes in the compensation which occur as a result of the change management process described in Section 6.7.

Expropriation, Eviction, and Compensation Decree Issued; Supplemental Compensation	The Republic of Cameroon will issue an expropriation and compensation decree Department by Department. The decree shall determine the amount of compensation to be paid by the Republic of Cameroon. COTCO will assess the value of the supplemental compensation on a Department by Department basis with input from the Republic of Cameroon.
Payment of Compensation	The Republic of Cameroon will pay compensation due under Cameroon legislation in cash. COTCO will provide supplemental compensation in cash and/or in-kind.
Parties Vacate Land	The land shall be made available, including, as the case may be, expropriation, eviction, release and inscription of the Land Easement, in due time following the administrative procedures and within the time periods described in Appendix VI of the Convention of Establishment.

6.3 ORGANIZATIONS AND ACRONYMS

In the following Sections a number of Republic of Cameroon governmental agencies are referenced, and a host of acronyms used. The purpose of this Section is to provide the reader with information regarding these agencies and acronyms.

Republic of Cameroon	COTCO
<ul style="list-style-type: none"> • Minister in Charge of Mines [MINMEE] • Pipeline Steering and Monitoring Committee [PSMC] • Minister in Charge of Lands [MINUH] • Verification and Valuation Commission [VVC] <ul style="list-style-type: none"> - VVC at the national level [VVC-NL] - VVC at the departmental level [VVC-DL] 	<ul style="list-style-type: none"> • Centerline Survey [CLS] • COTCO Designated Representative [CDR]

Key Documents	
ATP Application	Authorization provided in Law 96/14 granted by decree by the Republic of Cameroon to COTCO allowing it to carry out activities relating to construction, operations and maintenance of the Cameroon Transportation System. The ATP application is submitted by COTCO to the MINMEE.
Individual Owner/User Inventory Forms or "Individual Inventory Forms" [IIF]	An Individual Owner/User Inventory Form was prepared for each owner/user of resources within the proposed Land Easement. This includes potential photos, drawings, and an inventory of crops, trees, structures, and other compensable resources as defined in this Plan. The form is reviewed with the owner/user for completeness. The owner/user and easement team signs the form. If differences are stated, all parties will work to resolution. The owner/user is given a copy of the form for future reference.
Declaration of Public Purpose [DPP]	A DPP must be made to initiate the land acquisition and compensation process. The order is issued by the Minister in Charge of Lands.

6.4 LAND ACQUISITION PROCESS

The following tables describe the land acquisition and compensation process to be followed.

REPUBLIC OF CAMEROON/COTCO COMPILE LAND USE INFORMATION BY DEPARTMENT
As part of the CLS, COTCO, jointly with representatives of the Republic of Cameroon, has prepared Individual Inventory Forms of potentially compensable resources under both Cameroon legislation and under supplemental compensation as defined in this Plan along the proposed Land Easement. As the Inventory Forms are completed, they are sent to the Pipeline Steering and Monitoring Committee. The Inventory Forms will constitute a work document for the use of the DVVC.

DECLARATION FOR PUBLIC PURPOSE	
Instruction Procedure for the "Land Aspects" File of ATP	Documents COTCO Provides
<ul style="list-style-type: none"> • The MINMEE sends the ATP application file to the PSMC. • Within 30 days of receipt of said file the PSMC sends the DPP application file to the MINUH. • The "Land Aspects," part of the ATP application file will be attached to the DPP application file. • The MINUH reviews the DPP file in consultation with the PSMC. 	<ul style="list-style-type: none"> • In the "Land Aspects" part of the ATP application, COTCO provided a set of layout plans for the Cameroon Transportation System, which are based on temporary coordinates. • As part of the CLS, COTCO is preparing, on a Department by Department basis, layout plans of the final coordinates of the requested easement. • These plans are sent to the PSMC, along with a technical note and letter of commitment regarding the provision of logistic support, to be used for the DPP application.
<p style="text-align: center;">DECLARATION OF PUBLIC PURPOSE</p> <p>The Minister in Charge of Lands:</p> <ul style="list-style-type: none"> • Issues order declaring the activities relating to the construction, operation, and maintenance of the Cameroon Transportation System for a Public Purpose. The same order also appoints the Verification and Valuation Commission. The declaration is made for each Department affected. • Sends order to the préfet of the Department for publication and to convene the CDCE. 	

VERIFICATION AND VALUATION OF LEGAL AND SUPPLEMENTAL COMPENSATION	
RESPONSIBLE PARTIES AND RESPECTIVE ROLES	
Republic of Cameroon	COTCO
REVIEW BY THE VERIFICATION AND VALUATION COMMISSION (VVC) The Order declaring the Project is for a Public Purpose defines the Mission of the VVC.	<p>A COTCO Designated Representative (CDR): A senior COTCO representative will be designated to oversee the overall day-to-day activities of the supplemental compensation (including verification and valuation) process as defined in this Plan and work closely with the PSMC and VVC on issues concerning compensation. Responsibilities of the CDR include:</p> <ul style="list-style-type: none"> • Providing input/information to interested impacted parties such as individuals, households, villages, local organizations, and accepting informal feedback which will be considered. • Discussing COTCO's recommended supplemental compensation with: <ul style="list-style-type: none"> - The PSMC. - Other designated representatives from the ROC. - The VVC at both the national- and departmental-level. <p>The PSMC will provide formal comments and input to COTCO. COTCO will consider the input and make a decision.</p> <ul style="list-style-type: none"> • Providing information and accepting informal information and feedback of the VVC at the national- and departmental-levels; however, the official comments and input will come from the PSMC. • Working with the PSMC to collaborate with: <ul style="list-style-type: none"> - the appropriate national- or departmental-level VVC to coordinate mutually agreeable activities related to compensation, - the appropriate commission for payment of compensation. • Receiving and evaluating information related to testing the valuations for supplemental compensation as set forth in Section 6.7. <p>[continued]</p>
<p>Mission of the VVC: A VVC will be established for the Project for expropriation/eviction and compensation under Cameroon legislation and has the following responsibilities:</p> <ul style="list-style-type: none"> • Establish existing rights and evaluate affected assets. • Identify those who hold said rights and assets. <p>The VVC for this Project shall be responsible at the national level (VVC-NL) and the departmental levels (VVC-DL).</p> <ul style="list-style-type: none"> • At the <i>national level</i>²⁰ the VVC monitors, facilitates, and supervises as necessary the work of the VVC at the departmental level. The MINUH can request the VVC at the national level rule on disputes, which are submitted to it by VVC at the departmental levels. • The <i>departmental levels</i>²¹ of the VVC are responsible for carrying out the mission assigned to them within the area where they have jurisdiction. 	

²⁰ The National Commission is appointed by the Minister in Charge of Lands.

²¹ The Departmental Commissions are appointed by the Departmental Prefects.

RESPONSIBLE PARTIES AND RESPECTIVE ROLES [continued]	
Republic of Cameroon	COTCO
	<ul style="list-style-type: none"> • Providing the PSMC with timely information and soliciting feedback on: <ul style="list-style-type: none"> - Various events, - Compensation rate changes, including proposed methodologies to assess/adjust rates, and evaluation sheets, and - Process changes, and on identified issues to the PSMC. The PSMC will provide comments and feedback to the CDR in a timely manner. COTCO will consider the comments and input and make the decision. • Prepares individual agreements for payment of supplemental compensation.

PUBLIC INQUIRY AND CONSULTATION	
Republic of Cameroon	COTCO
Public Information	
<ul style="list-style-type: none"> • Upon receipt of the Declaration of Public Purpose, each Préfet advertises the contents of the order by posting it at: <ul style="list-style-type: none"> - the Préfecture, - Departmental Office of Lands, - City Hall, - sous-préfecture or district, - chefferie (where the land is located), and - any other place deemed necessary and utilizes any other means necessary to advertise the contents of the order. • Each Prefect will work with the CDR to coordinate posting of notices concerning supplemental compensation. 	<ul style="list-style-type: none"> • COTCO will advertise the supplemental compensation. This advertisement will be coordinated with information and publication campaign.
<ul style="list-style-type: none"> • The affected population shall be informed at least thirty (30) days in advance of the date and time of the Commission's visit. • The Commission will work with COTCO to coordinate presentations to affected individuals. <p><i>[continued]</i></p>	<ul style="list-style-type: none"> • Individuals will be informed of the date and time of a COTCO meeting to explain supplemental compensation at least 30 days in advance. • Attempts will be made to give verbal notification in French and in local languages. <p><i>[continued]</i></p>

Scope of the Public Inquiry

The inquiry is conducted by the entire departmental-level Commission in the presence of the affected population. The inquiry will include a description of resources for which the Republic of Cameroon will pay compensation.

At the inquiry the Republic of Cameroon will:

- Post rate sheets for resources which will be compensated under applicable Cameroonian legislation.
- Explain the estimated schedule for expropriation and eviction.
- Explain the Republic of Cameroon will be supportive of prior users of lands resuming their former activities on the Land Easement (includes the system easement).
- Inform individuals of grievance procedures concerning payment of compensation due according to Cameroonian legislation.

The CDR will accompany each departmental-level Commission on their visits, where feasible and necessary, to meet affected individuals and explain the supplemental compensation process. This presentation will occur immediately following the close of the Commission's formal inquiry.

At the inquiry, the CDR will:

- Explain the scope and nature of the supplemental compensation.
- Explain that COTCO compensation is not part of the Cameroon expropriation/eviction process.
- Post sheets listing the resources for which supplemental compensation will be paid.
- Post sheets listing the rates to be paid for each compensable resource.
- If a specific rate is not available, the process to be used to assess the rate will be presented.
- Explain the fact that the supplemental compensation:
 - is not provided under Cameroonian law.
 - will be determined and paid based on the rules established in the Plan and within the limits defined therein, to meet the intent of World Bank guidelines.
 - limits individuals only to the rights provided by the PC.
 - claims will be limited to types and quantities of resources specified in this Plan.
 - requires individuals to sign an agreement after compensation is calculated according to the principles explained above and that they will be provided with a copy of the agreement for review prior to signature.
- Solicit input concerning the appropriateness of supplemental compensation.

Feedback received during these meetings will be considered, and if COTCO is in agreement, supplemental compensation will be modified, based on local or regional variations.

The departmental-level Commission may provide informal comments and input on the rate sheets; however, the CDR will consider them prior to reaching a decision.

THE WORLD BANK WILL BE NOTIFIED OF THE SCHEDULE OF PUBLIC INQUIRY SESSIONS AND INVITED TO ATTEND THE SESSIONS.

PREPARATION OF DOSSIER ON LAND ACQUISITION FOLLOWING THE PUBLIC INQUIRY	
Republic of Cameroon	COTCO
<i>Preparation of Reports Concerning Compensation to Individuals</i>	
<ul style="list-style-type: none"> • In each Department in which land is needed for the Land Easement, a dossier is created for the land acquisition process as per applicable Cameroonian legislation. The dossier is prepared by the VVC in conjunction with the PSMC. • This dossier shall contain: <ul style="list-style-type: none"> - The PSMC request regarding the Land Easement, - The order appointing the departmental-level members of the VVC, - The crop valuation and forestry code valuation, - The structure valuation, - The complaint investigation mission report, - The mission report describing any incidents that may have taken place or any observations made by those affected by expropriation/eviction measures, - Layout plans showing the boundaries of the approved easement, and signed by the Directeur du Cadastre (Director in charge of the Land Register), - Cadastral layouts of private lands crossed by the Land Easement. • The ROC will provide the complete information from its dossier to COTCO. 	
<ul style="list-style-type: none"> • During preparation of the VVC dossier by Department, the PSMC will be the official coordinating body with COTCO concerning lists of owners/users eligible for compensation and inventories of resources by comparison with those recorded during the CLS, and to review and comment on COTCO draft final reports. • As each dossier is completed the departmental-level VVC will forward the dossier to the Minister in Charge of the Lands with a copy of PSMC. 	<p>Concurrent with preparation of the VVC dossier on land acquisition, the CDR will:</p> <ul style="list-style-type: none"> • Work with the PSMC and the national and/or departmental-level VVC to review and share information related to lists of land users eligible for compensation, and review any changes in inventories of compensable resources noted by the PSMC and/or the national and/or departmental-level VVC since preparation of the Inventory Forms. • Prepare COTCO final draft reports concerning the lists of individuals to whom supplemental compensation is due, and the amount of compensation due.

DECISION ON COMPENSATION	
Republic of Cameroon	COTCO
<ul style="list-style-type: none"> • Preparation of the decree: Upon receipt of the file the Minister in Charge of Lands reviews the establishment of facts and prepares the expropriation/eviction and incorporation decree. • The decree of expropriation and eviction is issued. 	<ul style="list-style-type: none"> • Upon receipt of the copy of the VVC file,²² transmitted by the PSMC, the CDR will review the file (including any final adjustments by the MINUH/PSMC) and may adjust the supplemental compensation to be paid by COTCO, if appropriate. This adjustment may be made on the basis of information received during the Public Inquiry and other forms of information. • The CDR will then prepare a final report listing all user/owners to whom supplemental compensation is due, a list of resources for which they would be compensated, and the rate for each will then be prepared. • This report will be forwarded to the PSMC for review and comment. • Depending upon the nature of the comments, the CDR may: <ul style="list-style-type: none"> - Adjust the COTCO supplemental compensation to be paid to reflect comments received by the PSMC. - Not adjust the COTCO supplemental compensation and will meet with the PSMC to discuss the COTCO position. • The CDR will then make a final decision on supplemental compensation due to individuals. • This decision is communicated to the PSMC.

²² This file contains, for each affected individual, a list of the numbers and types of each resource to be compensated and the amount to be paid.

PROCESS OF PAYMENT TO INDIVIDUALS	
Republic of Cameroon	COTCO
<p>Formation of Payment of Compensation Commission</p> <p>To implement the provisions of Decree 97/116, a decision shall be taken to create the Commission in each arrondissement to:</p> <ul style="list-style-type: none"> • pay compensation, and • to appoint its members <ul style="list-style-type: none"> - The sous-préfet (Chairman). - PSMC (Compensation disbursing official and Secretary). - The Treasury (to guarantee appropriation of public funds). - Village Chiefs. - Members of town councils. <p>The Commission responsible for payment of compensation shall prepare a report on how compensation payments were conducted. All Commission members shall sign this report. A copy of this report will be provided to COTCO.</p>	<p>Payment of Supplemental Compensation</p> <ul style="list-style-type: none"> • To ensure transparency in payment of supplemental compensation, COTCO will post or provide to village chief, supplemental compensation rate sheets for village review and consideration prior to payment of compensation. • Individuals may choose the type of compensation they prefer, either cash and/or in-kind. • The CDR will draw up an agreement listing resources being surrendered, the types of compensation (cash and/or in-kind) selected, and a supplemental compensation schedule. <ul style="list-style-type: none"> - The agreement will be reviewed with the affected individual to solicit any concerns, identify any changes in numbers or type of resources, or other differences in compensation prior to signing the agreement. - Should the impacted individual request additional time or a witness the CDR will accommodate the land user. • The signing of the agreement will be considered a conclusion to the compensation process. • COTCO will pay its supplemental compensation as follows after the agreement is signed: <ul style="list-style-type: none"> - Payments in cash will be made at the same time as the commission responsible for payment of compensation, when and where practicable. - If payment is made in-kind COTCO may either deliver the goods immediately following signature of the agreement or issue a credit at the time the agreement is signed and deliver the goods to the individual within the timeframe stipulated in the agreement. • The CDR will draft a report on the supplemental compensation payment process. The report will be sent to the PSMC. <p>Compensation for Assistance in the Compensation Process: Individuals who are requested to assist in the compensation process (for example, the identification of land owners/users or acting as a witness), will receive 2,500 CFA for each day spent with the CDR.</p>
<p style="text-align: center;">Payment of Compensation</p> <ul style="list-style-type: none"> • All payments shall be in cash. 	
<p>Payments To Individuals May Be Made In The Presence Of A World Bank Representative Or Other Third-Party Representative.</p>	

6.5 COMMUNITY COMPENSATION

6.5.1 For Loss of Communal Wild Resources as Per Article 8 of the Forestry Law

6.5.1.1 Republic of Cameroon

Compensation will be paid as described in Section 5.6 of this Plan.

6.5.1.2 COTCO Regional In-Kind Compensation

Regional community in-kind compensation will be provided for:

- the temporary loss of the communal wild resources in the Land Easement,
- inconvenience to the communities during construction, and
- restrictions on land-use within the System Easement during the life of the Project.

The range of compensations available will be based on the valuation of wild resources as described in Section 5.6.5.2 and regional consultation as described below. It is envisioned that compensation may include a broad range of items depending upon regional needs such as:

- distribution and planting of improved varieties of seeds and trees,
- stocking regional dispensaries with medications,
- vaccination programs, and
- schools and/or wells.

Regional community compensation will always be in-kind. The process to implement this compensation program is as follows:

Departments and communities directly affected by pipeline construction eligible to participate in the regional compensation program will be notified. Those notified will include: <ul style="list-style-type: none"> • The Préfet of each Department • Appropriate sous-préfet in the arrondissement in which the communities are located, and • A representative of each community directly affected by pipeline construction.
After notification, the CDR will schedule a meeting with each community and explain the range of compensations for which they are eligible. <ul style="list-style-type: none"> • The potential range of compensations will be based on previous consultation as described in Section 4.5. • The compensation will be directed towards meeting the broadest range of needs.
Communities and Departments will be requested to state their preferences and priorities concerning the range of in-kind compensations available.
Within budget, the CDR will then facilitate implementation of the regional compensations based on community preferences and priorities.
If a regional compensation requires long-term maintenance, COTCO will not be responsible for this maintenance.

6.5.2 For Permanent Loss of Customary Rights of Pump Stations and Storage Yards

Community compensation will be provided for permanent loss of customary usage of land used by the Project for pump stations and storage yards. Negotiation and implementation of this compensation shall not be part of the process described above.

Community compensation will always be in-kind as specified in Section 5.7 and will be identified in the following manner.

<p>The CDR will notify communities eligible for community compensation. At the same time, the community is notified, the CDR will notify the:</p> <ul style="list-style-type: none"> • Appropriate sous-préfet in the arrondissement in which the community is located, and • PSMC. <p>The sous-préfet and PSMC will be invited to participate in discussions held with the community regarding selection of a community compensation. They will be notified of any meetings scheduled in a timely manner.</p>
<p>After notification, the CDR will schedule a meeting with each community and explain the compensation for which they are eligible as described in Section 5.7.</p>
<p>Communities receiving compensation will use the traditional process of group discussion and debate to decide:</p> <ul style="list-style-type: none"> • on the type of improvement that the community wants, • whether it is capable of maintaining over time, and • whether it meets the needs of the largest number of people.
<p>When consensus has been reached in a community, the community leader will advise the CDR and sous-préfet for input. The CDR will then schedule a meeting of the community to discuss the compensation and agree on its implementation. Communities will forfeit their right to the compensation if they fail to reach agreement within two years following the start of construction activities within the geographical boundaries of the administrative unit. COTCO will inform the community that the two-year limit is an administrative decision set solely by COTCO.</p>
<p>The community compensation process will provide an opportunity not only for improvement of the village, but also for community development. The community will have to evaluate its needs, evaluate the costs of maintenance, and assess its capability to sustain one kind of investment over another, and operationalize the upkeep of the new community improvement. The CDR will facilitate the building of the chosen improvement.</p>
<p>COTCO will not be responsible for the maintenance of any community improvement.</p>
<p>When the construction is complete, community leaders and COTCO will hold a ceremony to formally turn over any new facilities to the community.</p>

6.5.3 Other Communal Resources

If other communal resources are identified, which are not covered by this Plan, they will be considered and negotiated on a case-by-case basis.

6.6 GRIEVANCES

There are two processes for which grievances will be handled. For compensation paid by the ROC, as per this Plan, the first channel is through the MINUH, as described in Section 6.6.2.2.

The primary channel for handling grievances for supplemental compensation is through the LCC as described in Section 6.6.2.1.

6.6.1 During Preparation of Impact Assessment

6.6.1.1 Centerline Survey Compensation

Disputes and concerns concerning compensation due as a result of damages during the CLS land clearing were handled at the time of compensation payment. All CLS compensation was paid entirely by COTCO.

Prior to payment of this compensation, land user/occupants were asked to review the list of compensable resources. If there was a dispute concerning crops and/or cultivated trees these were handled immediately. Since, evidence of the crop/tree was still present these claims could be handled promptly.

A large number of concerns were made concerning the value of several crops during the CLS, notably cacao, coffee, raffia, and manioc. As a result of these inputs, the gap compensation to be provided by COTCO will be re-evaluated. Adjustments will be made as appropriate.

6.6.1.2 Land Acquisition at Fixed Facility Sites

Concerns related to ability to acquire new land during the socioeconomic impact assessments at fixed facility sites will be the focus of follow-up assessments. Based on more intensive consultation with affected individuals, local authorities, village chiefs, and elders, appropriate compensation measures will be determined and implemented.

6.6.2 During Implementation of the Compensation Plan

6.6.2.1 COTCO Informal Grievance Procedures

The primary channel for handling grievances for supplemental compensation is through the LCC. As explained in the Section 4.5.2, the Project employs nine full-time LCCs to work in the 11 Departments along the pipeline route. These individuals hold regularly scheduled meetings in each of the approximately 238 villages along the Pipeline route approximately once every two months. At that time, individuals may express concerns either during the meeting or afterward in private. To the extent possible the LCC will seek a provisional solution to the issue.

If a provisional resolution cannot be agreed upon, a technical representative of COTCO will go to the village to validate the claim, document the discussion, and negotiate a provisional resolution.

The provisional resolution of either the LCC or the technical representative is submitted to COTCO management to approve. Management then instructs the organization how to implement it.

If COTCO management disapproves the resolution, a management representative of COTCO will go to the village to negotiate the final resolution.

All grievances noted by the LCC are included in weekly reports submitted to COTCO. Issues of significant concern needing follow-up action by more senior management are included in COTCO Issues Follow-Up Form as illustrated in Appendix J of this Plan.

Recordation of Compensable Resources

During the CLS individual inventory forms were completed and reviewed with each land user/occupant. If there were no objections, the form was then signed and information on the form entered into the master database. If objections were made, the survey and right-of-way crews worked to resolve any differences.

Approximately a month or more before the arrival of the DVVC in a village, a sheet listing the name of each land user/occupant was posted in each village by the LCC. This sheet included information on the number and types of compensable resources recorded. In addition, rate sheets listing the types of compensable resources and amounts due by the Republic of Cameroon and by COTCO were posted.

At the time the individual inventory summary lists were posted in each village, the LCC requested that each individual user/occupant review this record for completeness and note any discrepancies in a notebook left with the village chief or other designated representative. During each subsequent visit to the village, the LCC checked the contents of notebook for comments.

Other Grievances/Conflicts

During any informal meetings, it is the responsibility of the LCCs to provide current information on the progress of the Project as well as to record any grievances/concerns of villagers in the Departments for which they are responsible. If grievances and concerns cannot be resolved by the LCC, they will be brought to the attention of the CDR for resolution.

Grievances for any purpose can be brought to the LCC for recordation and consideration by COTCO management. Affected individuals/families may seek the counsel of village chiefs and elders who can also represent them in their claims, or seek to negotiate resolution of minor disputes.

6.6.2.2 Republic of Cameroon and COTCO Grievance Procedures Concerning Payment of Compensation.

Grievances concerning compensation payments paid by the Republic of Cameroon are subject to legal procedures and remedies under Cameroonian law. Specific grievances concerning supplemental compensation, which cannot be resolved through informal negotiation at the local level, will be referred to the CDR for more formal inquiry as set forth below.

Republic of Cameroon	COTCO
<ul style="list-style-type: none"> • While the VVC is conducting its work, some individuals or communities may question the veracity of the information given to said Commission. • The VVC shall publicly note, the declarations made by all sides in the dispute, by community chiefs and notables who happen to be present, and by any person who may be able to clarify the situation for the Commission. This Commission shall use all available means, to reach a compromise that is satisfactory to all sides in the dispute. The incident, the way in which it was handled, and the results shall be noted in the mission's report. • If the dispute cannot be resolved in the field, the MINUH, after reviewing the mission's report, can make a decision and prepare the expropriation/eviction decree, or refer the dispute to the National VVC. • However, the affected individuals shall still have at their disposal the remedies provided under Cameroonian law, if the are not satisfied with the final decision of the MINUH. 	<ul style="list-style-type: none"> • The primary channel through which people can state grievances concerning non-fulfillment of supplemental compensation agreements, as defined in this Plan will be the CDR. • If a grievance is brought, various proofs that compensation is due may be considered. • All attempts will be made to settle grievances concerning supplemental compensation that are made to the CDR in writing or in person. • The CDR may consult with the local officials, village chiefs, and elders and other records to determine a claim's validity. • If valid, the supplemental compensation will be adjusted. • The CDR will draft a report concerning the resolution of grievances. A copy of this report will be sent to the PSMC. • Where a resolution has not been reached, COTCO senior-management will review the issue and make a decision.

6.7 REVIEW STRUCTURE AND CHANGE MANAGEMENT PROCESS

It is normal that some supplemental compensation procedures and rates may require revision during the program. COTCO will implement any changes through a Change Management Process. The Change Management Process involves feedback from/during:

- The Public information Campaign, the CLS, and public inquiries held as part of the compensation process.
- From the Republic of Cameroon through the PSMC.
- Formal and informal discussions with individuals and during village meetings.
- Testing of the valuations of resources during the compensation process.
- Monitoring of inflation in the cost of goods and services.

- Suggestions from interested organizations.

COTCO will evaluate information received and assess if follow-up inquiries or changes are necessary and appropriate. If COTCO assesses that additional follow-up is appropriate, COTCO will notify the PSMC for scheduled input and comment. COTCO will consider this input and incorporate it into the decision-making process.