Gender-Responsive Grievance Mechanisms in Climate Projects: Lessons from M4CR in Indonesia

Yessi Yolanda Sarah Br Tarigan
Department of Political Science, Faculty of Social and Political Sciences, Universitas Udayana
yessi_sarah@unud.ac.id

Abstract
This study examines how the Feedback and Grievance Redress Mechanism (FGRM) under Indonesia's Mangroves for Coastal Resilience (M4CR) project mainstreams Gender Equality, Disability, and Social Inclusion (GEDSI) to strengthen social accountability and ensure equitable benefits for all. Using a public policy perspective in political science, this research adopts a qualitative method: analysis of policy documents (Project Appraisal Document, Environmental and Social Management Framework, Stakeholder Engagement Plan, Labor Management Procedures), and administrative project data (GRM logs and M&E indicators) across four priority provinces. The analysis is guided by the policy cycle and an intersectional lens. Analytical strategies included directed content analysis, multilevel actor mapping, and cross-province comparative analysis. Initial findings indicate that the FGRM design meets formal standards; however, implementation gaps persist in access for women and persons with disabilities (literacy, mobility, privacy) and in survivor-centered handling of SEA/SH. We identified prerequisites for effective implementation: designated female focal points, safe anonymous channels, disaggregated data practices, and budgeted community-based outreach. The limitations of this study include the heterogeneous administrative records across provinces. This study offers an operational evaluation framework for gender-responsive FGRM integration into project M&E systems. Its novelty lies in coupling GEDSI indicators with social accountability to map design–delivery gaps in a national-scale nature-based program.
Keywords: *FGRM; GEDSI; social accountability; M4CR; coastal resilience*

1. Introduction

Indonesia's mangrove ecosystems are among the largest and most productive globally. Spanning approximately 3.4 million hectares (ha), Indonesia's mangroves account for over 20 percent of the total global mangrove area (Ministry of Environment and Forestry MoEF, 2021). Mangroves are widely recognized as effective nature-based solutions for climate adaptation and as the cornerstone of coastal resilience. These ecosystems provide shoreline protection from climate-related and other disasters, such as storms and tsunamis, and reduce the risks of flooding, inundation, and erosion. In parts of Indonesia, the coastal protection value of mangroves has been estimated at more than US$10,000 per hectare per year, with variations depending on population density and the value of nearby infrastructure and communities (World Bank, 2021).

Given the critical importance of mangroves for livelihoods, resilience, and climate, the Government of Indonesia launched the National Mangrove Rehabilitation Program as a presidential priority in 2020, with a target of rehabilitating 600,000 hectares of degraded mangroves by 2024. The program is implemented by several ministries and agencies, led by the Coordinating Ministry for Maritime Affairs and Investment, MoEF, the Ministry of Marine Affairs and Fisheries (MMAF), and the Peatland and Mangrove Restoration Agency (BRGM), with the involvement of the private sector and civil society organizations. The program is supported by development partners, including the World Bank, through the Mangroves for Coastal Resilience (M4CR) project implemented in four provinces: Riau, North Sumatra, North Kalimantan, and East Kalimantan.

M4CR activities are organized into four main components. First, *strengthening policies and institutions* through the preparation and reinforcement of regulations, cross-ministerial coordination, and updating the National Mangrove Map (PMN) and the mangrove rehabilitation registration and monitoring system as the basis for mangrove management and financing, including the development of blue carbon schemes (World Bank, 2022; Blue Carbon Partnership, 2023). Second, *the rehabilitation and sustainable management of mangrove landscapes*, with a rehabilitation target of approximately 75,000

ha across four main mangrove landscapes. Recent implementation reports indicate that thousands of hectares have been included in the assessed rehabilitation plans, and approximately 13,378 ha will be planted by December 2024 (World Bank, 2024). Third, *coastal community livelihoods are strengthened* through cash-for-work schemes, mangrove-based livelihood development, and coastal enterprise support, involving more than 6,000 cash-for-work participants and dozens of small business plans approved for technical and financial assistance (World Bank, 2024). Fourth, *project management, monitoring, and learning*, including project management by the Indonesia Environment Fund together with MoEF, BRGM, and the Coordinating Ministry for Maritime Affairs and Investment, a performance monitoring system, and the production and dissemination of knowledge and good practices, supported by approximately USD 419 million in financing from the IBRD and various trust funds to ensure the sustainability of mangrove management and coastal resilience in Indonesia (World Bank, 2022; Ramadhan, 2025).

In 2024, the BRGM emerged as a key field implementer of the M4CR, particularly in accelerating mangrove rehabilitation and management (World Bank, 2024). Through its regional implementation units, the BRGM facilitated the identification and designation of rehabilitation sites, the initial planting of thousands of hectares of mangroves, community capacity building through field schools and mangrove-based business training, and the provision of cash-for-work schemes and matching grants for coastal community groups (BRGM, 2024a, 2024b). This role positions the BRGM as a crucial liaison between national mangrove rehabilitation targets and the strengthening of socio-ecological resilience at the village level, within the framework of the National Mangrove Rehabilitation Program and World Bank financing support (World Bank, 2024).

Gender Equality, Disability, and Social Inclusion (GEDSI) is a key pillar in the design and implementation of the M4CR project, particularly under Component 4, which governs project management, monitoring, and compliance with environmental and social safeguards. Through the Environmental and Social Commitment Plan (ESCP), MoEF and BRGM commit to ensuring that vulnerable groups, including women, persons with disabilities, and Indigenous communities, have equal access to information, decision-making processes, project benefits, and a GEDSI-responsive Feedback and Grievance Redress Mechanism (FGRM), including procedures for addressing the risks of sexual exploitation and abuse/sexual harassment (SEA/SH) (MoEF & BRGM, 2022). This commitment is reinforced by the Environmental and Social Management Framework (ESMF), which requires the identification and mitigation of risks for vulnerable groups and the operation of an inclusive FGRM at the project level. Technical details on how GEDSI principles are to be integrated into day-to-day implementation from site planning and community engagement to grievance reporting are further elaborated in the Project Operations Manual (POM), which serves as operational guidance for all M4CR implementers (World Bank 2022).

In this context, 2024 is a crucial year because M4CR will begin to enter its full implementation phase in multiple BRGM-assisted locations. This creates a timely opportunity to examine whether strong GEDSI commitments in the project's design have started to materialize in practice. Specifically, this study aims to assess the extent to which GEDSI principles are implemented in FGRM practices in the field by 2024, focusing on community access to complaint channels, sensitivity to gender-based and SEA/SH-related risks, and the active involvement of women and persons with disabilities in the complaint-handling process. By doing so, this study seeks to contribute to broader debates on gender-responsive and socially inclusive grievance mechanisms in large-scale, nature-based climate programs.

2. Literature review and hypothesis development

The existing literature shows that gender-responsive grievance systems play a critical role in enhancing accountability and public trust, particularly in development programs and climate governance. Grievance mechanisms designed with the specific needs of women, the poor, and other vulnerable groups in mind can broaden participation and reduce structural barriers to accessing procedural justice (UNDP, 2020; World Bank, 2021). In the context of a national-scale mangrove program, such as the M4CR, a gender-responsive FGRM functions not only as a channel for handling complaints but also as

a corrective instrument that enables real-time policy adjustment and adaptive management based on feedback from affected communities.

Within this broader field, this study adopts the lens of Gender Equality, Disability, and Social Inclusion (GEDSI) as a normative and analytical framework to assess whether grievance systems meaningfully accommodate the needs and voices of women, persons with disabilities, and other marginalized groups. GEDSI frameworks are increasingly used in development practice to move beyond generic "vulnerable groups" language towards more explicit attention to how intersecting forms of exclusion shape who participates, who benefits, and who is heard in public programmes. Climate governance studies further emphasize that community vulnerability cannot be understood through a single identity marker but is shaped by the intersection of multiple dimensions, such as gender, class, ethnicity, geographic location, and disability status, which is commonly referred to as intersectional vulnerability (Crenshaw, 1989; Shackleton, 2021).

An intersectional lens highlights that access to information, consultation forums, and institutional channels, including FGRM, is never neutral; it is mediated by power relations and social norms that place certain groups in marginal positions. Consequently, an FGRM that is merely "open to all" without specific strategies to reach vulnerable groups risks reproducing the very inequalities that the program seeks to address. Therefore, intersectionality provides a conceptual basis for the GEDSI indicators used in this study, such as the presence (or absence) of sex- and disability-disaggregated data, explicit reference to Indigenous communities, and tailored outreach measures in FGRM design and reporting.

Although there is a growing body of work on climate governance, climate justice, and nature-based solutions, relatively few studies have examined how GEDSI-sensitive grievance mechanisms are operationalized within national-scale nature-based programs such as the M4CR. Much of the literature remains at the level of principles and institutional design, with limited attention to how FGRM is used, by whom, for what types of grievances, and to what extent the voices of women, persons with disabilities, and Indigenous communities are reflected in policy responses. In the Indonesian context, the M4CR and the mandate of the Peatland and Mangrove Restoration Agency (BRGM) offer a particularly relevant case to explore these questions, given the program's explicit GEDSI commitments in its safeguard documents and its role as a flagship presidential initiative. This research addresses the global and national gaps by integrating GEDSI indicators into a policy cycle analysis from agenda-setting and formulation through implementation and evaluation to assess the consistency between normative commitments and practice on the ground.

From the perspective of political science, the importance of actors and policy design in implementation has long been stressed by major public policy theorists. Pressman and Wildavsky (1973) demonstrate that implementation failure often arises from the complexity of the "chain of implementation," involving multiple actors and decision points; the longer and more fragmented this chain, the greater the risk of policy distortion. Grindle (1980) argues that implementation is a political process shaped by the content of policy and the context of implementation, in which actors with different interests, resources, and power negotiate and contest policy meaning. Lipsky (1980) goes further by conceptualizing front-line implementers as street-level bureaucrats who, in practice, "make" policy through their daily exercise of discretion. Together with the classic policy cycle framework (agenda-setting, formulation, implementation, evaluation), these contributions underline that the fate of any policy instrument, including the FGRM, depends not only on its formal design but also on how it is interpreted and enacted in specific institutional settings.

Building on this theoretical foundation and the identified empirical gap, this study advances two main hypotheses. First, drawing on intersectionality and street-level bureaucracy, we hypothesize that an inclusive FGRM design does not automatically guarantee inclusive implementation because practice on the ground is mediated by power relations, social norms, and the discretion of implementing actors. Second, following Grindle's emphasis on context and Pressman and Wildavsky's analysis of implementation chains, we hypothesize that institutional capacity encompassing resources, leadership, cross-agency coordination, and the presence of GEDSI "champions" shapes the consistency between

design and implementation, including the extent to which GEDSI principles are realized in the concrete experiences of women, persons with disabilities, and other vulnerable groups in accessing and using FGRM under BRGM's coordination in 2024.

3. Methodology

This study employs a qualitative research design with an interpretive approach to trace how GEDSI-sensitive FGRM is understood and operationalized by key actors in the M4CR project. A qualitative design was chosen because it allows the researcher to capture the context, meaning, and power dynamics behind policy texts and implementation practices, in line with the view that qualitative research focuses on processes, actors' perspectives, and the social construction of policy and programs (Denzin & Lincoln, 2018; Creswell & Poth, 2018). This is also consistent with the tradition of qualitative program evaluation, which prioritizes an in-depth understanding of how a program works rather than merely measuring outputs (Patton, 2015).

The primary data sources consist of: (1) project policy documents, including the Project Appraisal Document (PAD), ESMF, SEP, and Labour Management Procedures (LMP), which together set out the project logic, social environmental safeguards, stakeholder engagement strategy, and worker grievance mechanisms; (2) environmental and social commitment documents such as ESCP, which specify the institutional obligations of MoEF and BRGM for managing social environmental risks and operating FGRM; and (3) administrative records, including FGRM complaint logs, monitoring reports on environmental and social indicators, and BRGM's 2024 FGRM implementation documents in the four pilot provinces, which are used to trace patterns of use, types of grievances, institutional responses, and the extent to which GEDSI dimensions appear in practice.

The analysis was conducted in three main steps. First, a directed content analysis was conducted on all policy and administrative documents using initial coding categories derived from the policy cycle (formulation, implementation, evaluation) and GEDSI indicators. This allows for the mapping of consistency between normative design and operational provisions for FGRM across project documents and links the analysis to the interpretive policy tradition, which views policy as a sequence of meaningful practices rather than a purely technocratic instrument (Yanow, 1999; Fischer, 2003). Second, multilevel actor mapping is undertaken to identify the roles, mandates, and power relations among national actors (MoEF, BRGM, and financiers), provincial and district actors, and frontline implementers at the village and community levels, to understand how their capacities and discretion shape the application of GEDSI principles in the FGRM.

Third, a cross-province comparative assessment compares patterns of FGRM design implementation in the four pilot provinces, allowing the study to identify factors that enable or constrain the realization of an inclusive FGRM. Epistemologically, this research is situated within the tradition of interpretive policy analysis, which holds that implementation can only be understood by unpacking the meanings, values, and narratives produced and negotiated by actors within specific social and institutional contexts (Yanow, 1999; Wagenaar, 2007). The GEDSI framework is then used as an analytical lens to assess whether the FGRM not only exists formally on paper but also substantively accommodates the needs and lived experiences of women, persons with disabilities, and other vulnerable groups in BRGM's FGRM practice throughout 2024.

4. Results and Discussion

4.1. FGRM BRGM

The findings indicate that by 2024, the BRGM will have established a relatively comprehensive FGRM framework for the M4CR project at the project level. The FGRM is defined as a process for receiving, assessing, handling, and recording complaints from targeted coastal communities, project stakeholders, and members of the public who are concerned about M4CR activities. Its scope explicitly covers three main user groups: beneficiaries and affected communities (including Indigenous peoples in project areas), project workers (including those recruited through third parties), and the public, with the overarching objective of strengthening accountability and project governance (BRGM 2024).

In terms of governance, FGRM management is located within the Project Implementation Units (PIUs) under the direct supervision of the Project Director or Task Force Head, while the Project Management Office (PMO) and the Indonesia Environment Fund (IEF) provide technical support, help troubleshoot complex cases, and consolidate all feedback and complaints along with their resolutions. The mechanism is underpinned by the principles of confidentiality and protection of complainants: grievances may be submitted with full identity or anonymously, and the identity of complainants must not be disclosed without consent, especially in sensitive cases such as alleged fraud or sexual exploitation and abuse/sexual harassment (SEA/SH), which are also covered by the project's whistle-blowing provisions (BRGM, 2024).

Operationally, the BRGM offers multiple complaint channels building on existing institutional infrastructure: a dedicated email address, SMS 1708, a WhatsApp number, the DUKMAS BRGM application, direct messages via BRGM's official social media accounts, complaint links through the BRGM website and SP4N-LAPOR, as well as written submissions and walk-in complaints at the BRGM office in Jakarta. Project documents also emphasize that information on these channels and procedures must be communicated in accessible formats and displayed at the PIU level to ensure broad outreach to communities (BRGM, 2024).

The FGRM structure distinguishes three broad categories of issues: (i) complaints from the public and target communities, including Indigenous peoples; (ii) worker grievances; and (iii) project-related incidents, such as occupational accidents, COVID-19 infection, or SEA/SH cases. The handling process is organized into three main stages: initial receipt, registration, and referral of the complaint through a tracking system; review and investigation, which must be completed within a maximum of 20 working days; and provision of feedback to the complainant in the form of verification and an update on the resolution status via letter, email, face-to-face meetings, or the channel used to submit the complaint. A dedicated Feedback and GRM Assistant plays a central role in coordinating FGRM implementation across components, preparing outreach materials, receiving and tracking complaints, routing them to relevant directorates or third parties, maintaining communication with complainants, and consolidating FGRM reports from PIUs to the PMO.

Taken together, these structures, procedures, and channels show that by 2024, the BRGM has laid down a clear and well-documented institutional foundation for the M4CR's FGRM, which then becomes the basis for assessing how far this design is implemented in an inclusive and GEDSI-responsive manner in practice (BRGM, 2024). When read against the policy cycle, these findings indicate that the formulation stage of M4CR's FGRM is relatively robust at the national level, with clear definitions, procedures, and institutional roles set out in project documents. In contrast, the subsequent stages of implementation and feedback-based revision are far less developed, as reflected in the limited evidence of the systematic use of FGRM data to adjust program activities in the four pilot provinces.

4.2. Implementation FGRM BRGM

The second set of findings suggests that the implementation of the FGRM in 2024 is strongly shaped by the broader **acceleration logic** of the M4CR, which has constrained the extent to which GEDSI considerations are integrated into day-to-day practice. As M4CR is framed as a presidential priority program with ambitious, time-bound targets for mangrove rehabilitation and disbursement, BRGM's 2024 work plans and monthly reporting are dominated by activities that support *accelerated delivery*, such as supervision missions, performance audits, support for litigation and BPK examinations, and advocacy for rehabilitation progress rather than by systematic outreach and facilitation for women, persons with disabilities, and other vulnerable groups to use the FGRM. In the December 2024 report, FGRM-related tasks are listed alongside a wide range of compliance and oversight duties, and key GEDSI-relevant actions, such as socialization of complaint handling to Provincial Implementation Units (PPIU) and strengthening community access to grievance channels, still appear more as planned or ongoing items than as fully implemented, routine practices (BRGM, 2024b). This pattern indicates that under acceleration pressures, the FGRM is present but primarily framed as part of the control and

accountability architecture needed to keep the project "on track," rather than as a proactive instrument for GEDSI-responsive participation.

The monthly documentation also highlights budgetary and human resource constraints, including limited dedicated staff time for the FGRM and delays in activities that lack a clear regulatory basis or specific budget line. These constraints help explain why a formally inclusive FGRM design, as laid out in the PAD, ESMF, SEP, and ESCP, has not been fully translated into GEDSI-sensitive implementation. In Grindle's terms, the *context of implementation* (tight timelines, pressure to show physical outputs, incomplete regulations, and constrained resources) shapes which parts of the *content of policy* are prioritized and which are deferred (Grindle, 1980). Under such conditions, frontline implementers and Feedback and GRM Assistants must constantly triage competing demands: revising regulations, responding to audits, preparing supervision materials, and only then finding space to design and carry out GEDSI-focused outreach.

This reflects Pressman and Wildavsky's insight that long and complex implementation chains, especially in accelerated multi-actor projects, create multiple points where slippage occurs between ambitious design (including GEDSI commitments) and concrete outcomes on the ground (Pressman & Wildavsky, 1973).The multilevel actor mapping further suggests that national-level units (PMO, IEF, and BRGM headquarters) dominate the design and oversight of the FGRM, while provincial implementation units and village-level actors mainly appear as recipients of supervision and instructions rather than as active co-designers of GEDSI-sensitive grievance practices. This vertical imbalance reinforces the tendency for FGRM to be framed as a compliance tool rather than a locally owned accountability mechanism.

Through the lens of street-level bureaucracy, the concentration of FGRM and oversight responsibilities in a small number of staff at the center means that much of the GEDSI operationalization depends on their discretion, priorities, and available time (Lipsky, 1980). When acceleration targets for hectares rehabilitated, fund absorption, or audit findings become dominant performance signals, it is unsurprising that time- and resource-intensive tasks such as community facilitation, disability-inclusive communication, or separate consultations with women's groups receive less attention in planning and implementation of the project. Our qualitative, interpretive design using directed content analysis of 2024 FGRM documents, multilevel actor mapping, and cross-province comparison reveals that the main bottleneck is not the absence of GEDSI language in project documents, but the way acceleration imperatives and capacity constraints shape how actors *interpret* and *enact* FGRM in their daily work (Yanow, 1999; Wagenaar, 2007).

Although the formal FGRM architecture is identical across the four pilot provinces, the available 2024 documentation suggests variation in how far complaint handling has been socialized and embedded. In some provinces, the FGRM appears mainly in the form of internal coordination and brief mentions in supervision missions, whereas in others, there are initial steps towards communicating complaint channels to communities through meetings and local partners. However, these differences are not yet accompanied by systematic, province-level monitoring of who uses the mechanism or how complaints are resolved, which limits the extent to which cross-provincial learning on GEDSI-responsive grievance practices can take place

Consequently, at the level of overall M4CR implementation, activity planning in 2024 appears to prioritize meeting biophysical and administrative acceleration targets, while GEDSI is more visible in normative commitments and document templates than in operational schedules, budgets and performance expectations. The FGRM is designed to be inclusive; however, in practice, it is still largely absorbed into existing control and audit routines. Specific strategies to ensure that women, persons with disabilities, and other vulnerable groups can safely access and effectively use grievance channels have only been partially developed and unevenly implemented across the four pilot provinces. This misalignment between design and practice directly supports the study's hypothesis that an inclusive FGRM on paper does not automatically produce inclusive implementation, and that institutional

capacity under conditions of accelerated delivery plays a decisive role in determining whether GEDSI commitments become lived realities for coastal communities affected by M4CR in 2024.

These findings also speak to the broader literature on gender-responsive grievance mechanisms and climate governance. While UNDP (2020) and the World Bank (2021) highlight that grievance systems explicitly tailored to the needs and constraints of women and other vulnerable groups tend to enhance accountability and trust, the BRGM's FGRM in 2024 remains closer to a generic, administratively neutral mechanism. In other words, the mechanism fulfils core procedural requirements but has yet to translate GEDSI commitments into concrete design features, such as gender- and disability-disaggregated indicators, targeted outreach to women's groups, or systematic analysis of who uses the system. This gap reinforces the relevance of examining a national nature-based program like M4CR, which, despite its strong safeguard architecture, still struggles to embed GEDSI in the everyday operation of its grievance systems.

From an intersectionality perspective, the absence of sex-disaggregated complaint data, disability markers, or specific references to Indigenous women or other marginalized groups in the 2024 FGRM logs means that intersectional vulnerability is largely invisible in routine reporting. In other words, the categories through which the BRGM "sees" and reports FGRM use remain administratively neutral, even though the climate governance literature shows that access to information and institutional channels is patterned by intersecting axes of gender, class, ethnicity, and location (Crenshaw, 1989; Shackleton, 2021). This gap between intersectional risk and non-disaggregated monitoring further weakens the grievance mechanism's gender responsiveness.

4.3. Gender-Responsive Grievance Mechanisms in BRGM

Under M4CR, the BRGM has formally positioned its Feedback and Grievance Redress Mechanism (FGRM) as an inclusive system intended to serve all communities affected by mangrove rehabilitation, which provides an initial entry point for gender-responsive grievance handling. The inception report defines the FGRM as a process for receiving, assessing, responding to, and documenting complaints from beneficiaries, affected communities (including Indigenous groups), project workers, and the general public, with explicit reference to confidentiality and the handling of sensitive cases, such as sexual exploitation and abuse/sexual harassment (SEA/SH) (Peatland and Mangrove Restoration Agency BRGM, 2024a). The public-facing design of this mechanism is visualized in the official M4CR complaint leaflet, which invites "questions, complaints, and suggestions" from anyone regarding BRGM's M4CR activities and presents multiple entry points for hotline numbers, email addresses, QR codes, and web links mapped onto the four pilot provinces (see Figure 1). This layout signals that the mechanism is open to the broad public rather than being restricted to state actors or project contractors (BRGM, 2024c).

Figure 1. *Public leaflet for the M4CR feedback and complaint mechanism*
Source: Adapted from BRGM (2024)

At the procedural level, the leaflet also conveys a simplified business process: complaints can be submitted online or offline, registered and acknowledged, screened to determine whether they fall within BRGM's mandate, verified, clarified, acted upon, and finally categorized as completed, in process, or pending. This visual workflow, placed directly under the contact information, functions as a basic communication tool for accountability by showing complainants what to expect after submitting a case (BRGM, 2024c). Taken together with the inception report and safeguard documents, this design indicates that the FGRM is intended to be accessible, multi-channel, and procedurally clear, which are important preconditions for a gender-responsive grievance mechanism.

However, when this design is read through a GEDSI lens and compared with implementation evidence from the 2024 monthly report, the gender-responsiveness of the mechanism appears largely *implicit* rather than operationalized. While the inception report and project safeguards acknowledge "vulnerable groups" and SEA/SH risks, neither the leaflet nor routine reporting highlights tailored measures for women, persons with disabilities, or other marginalized groups, such as sex-disaggregated FGRM indicators, disability-accessible formats, or explicit collaboration with women's organizations (BRGM, 2024a, 2024b, 2024c). The December 2024 Feedback and GRM Assistant report shows that most FGRM-related work is still absorbed into regulatory drafting, supervision missions, audit support, and risk identification, while activities that would make the mechanism substantively gender-responsive, such as targeted outreach to women and disability groups or systematic analysis of who actually uses each channel, remain planned or ad hoc rather than institutionalized routines (BRGM, 2024b).

From a policy implementation perspective, this pattern confirms the argument in the public policy literature that inclusive design does not automatically produce inclusive outcomes. Pressman and Wildavsky's (1973) notion of complex "implementation chains" helps explain how acceleration pressures and multiple approval points in a presidential priority program like M4CR create opportunities for slippage between GEDSI-sensitive commitments on paper and what busy officials prioritize in practice. Grindle's (1980) distinction between *the content* and *context* of policy clarifies that the content of M4CR's FGRM–its multi-channel access, SEA/SH provisions, and references to vulnerable groups–is filtered through a context of limited staff and budget, tight timelines, and strong pressure to show physical rehabilitation outputs, resulting in the selective enactment of GEDSI elements. In line with the interpretive and qualitative framework outlined in the methods section (Creswell & Poth, 2018; Yanow, 1999), the leaflet, inception report, and monthly report can thus be read as texts in which actors primarily make sense of the FGRM as a compliance and control tool; gender-responsiveness is present as a normative horizon, but not yet fully embedded in the everyday practices through which coastal women, persons with disabilities, and other vulnerable groups access and use BRGM's grievance channels in 2024.

Taken together, Sections 4.1 and 4.3 show that while M4CR's FGRM is normatively designed as an inclusive and GEDSI-sensitive mechanism, its 2024 implementation remains uneven and only partially operationalizes these commitments. This pattern directly confirms the first hypothesis formulated in the introduction, namely, that an inclusive FGRM design does not automatically translate into inclusive implementation. Simultaneously, the central role of a small number of staff, the dominance of accelerated delivery targets, and budgetary and regulatory constraints provide empirical support for the second hypothesis that institutional capacity and context shape the consistency between design and practice in BRGM's FGRM.

In line with the interpretive policy analysis approach outlined in the methods section, the inception report, monthly reports, and public leaflet are treated not only as administrative artifacts but also as texts through which BRGM staff construct the meaning of FGRM in their everyday work. The predominance of audit, supervision, and acceleration language in these documents suggests that, for many actors, FGRM is primarily understood as a requirement to demonstrate control and compliance rather than as a vehicle for amplifying the voices of women, persons with disabilities, and other vulnerable groups. This interpretive reading helps explain why GEDSI appears more strongly in formal commitments than in routine FGRM.

Simultaneously, it is important to recognize the limits and specific vantage points of this study. Because the analysis is based primarily on project documents, monthly reports, and public communication materials, it captures how the BRGM as an institution designs, represents, and prioritizes the FGRM, rather than offering a full account of how coastal communities themselves experience and perceive the mechanism. This document-based, interpretive qualitative approach is appropriate for answering the research questions on design–implementation gaps and institutional capacity, but it also points to the need for complementary future research that incorporates community-level perspectives, including those of women, persons with disabilities, and Indigenous groups, to fully assess the effectiveness and legitimacy of M4CR's GEDSI-responsive grievance mechanisms.

5. Conclusion

5.1 Conclusion

This study examined the design and implementation of the BRGM's FGRM under the Mangroves for M4CR project through a GEDSI and interpretive policy lens. The findings show that by 2024, BRGM had established a relatively robust FGRM architecture at the project level, with clear procedures, a dedicated institutional structure, multiple complaint channels, and explicit provisions for handling sensitive cases such as SEA/SH. When read through the policy cycle, however, this strength is concentrated at the formulation stage: implementation and feedback-based revision remain underdeveloped, and FGRM data are not yet systematically used to adjust program activities.

The analysis of 2024 documents further indicates that the acceleration logic of M4CR time-bound rehabilitation targets, strong audit demands, and resource constraints means that the FGRM is framed and used primarily as a control and compliance tool rather than as a proactive, gender-responsive accountability mechanism. Intersectional vulnerability is largely invisible in routine reporting because complaint data are not disaggregated by gender, disability, or other social markers. Taken together, these findings confirm the first hypothesis that an inclusive FGRM design does not automatically lead to inclusive implementation and support the second hypothesis that institutional capacity and context decisively shape the consistency between design and practice in the BRGM's FGRM.

5.2 Limitation

The conclusions of this study must be read with consideration of several limitations. First, the analysis is based primarily on qualitative document review inception reports, safeguard frameworks, monthly reports, and public communication materials rather than direct engagement with communities or complainants. The study captures how the BRGM as an institution designs, represents, and prioritizes FGRM, but cannot fully account for how coastal women, persons with disabilities, Indigenous peoples, and other vulnerable groups experience and perceive the mechanism. Second, the empirical focus is on 2024, when M4CR is still in an early and accelerated phase of implementation; the dynamics of FGRM and GEDSI integration may evolve as the project matures, which this study cannot track. Third, the cross-province comparison is constrained by the uneven availability and detail of subnational documentation, limiting the depth of the analysis of provincial and village-level variations. Finally, relying on project-generated documents means that the evidence is filtered through institutional logics and reporting incentives; some dimensions of conflict, contestation, or informal complaint practices may remain under-reported or invisible in the data used here.

5.3 Suggestion

Despite these limitations, the findings have several concrete implications for policy and future research. At the policy and program level, BRGM and its partners could strengthen the gender-responsiveness of M4CR's FGRM by: (1) introducing sex- and disability-disaggregated indicators in complaint recording and reporting; (2) budgeting explicitly for GEDSI-focused outreach, including collaboration with women's organizations, disability groups, and Indigenous representatives in the four pilot provinces; and (3) developing clear guidance and training for PIUs and village-level actors on how to handle complaints from vulnerable groups, including SEA/SH cases, in a safe and survivor-centered way.

Aligning GEDSI work with acceleration imperatives will also require embedding FGRM and GEDSI indicators into performance expectations and supervision missions so that community facilitation and

inclusive communication are seen as core project outputs rather than optional add-ons. At the research level, future studies could complement this document-based analysis with community-level qualitative work and mixed-methods designs, bringing in the perspectives of users and non-users of FGRM to assess trust, accessibility, and perceived fairness of the FGRM. Longitudinal research following M4CR over several years would also help understand whether and how institutional learning, capacity building, and evolving political priorities translate into more substantive GEDSI integration in grievance handling.

Acknowledgment

The author gratefully acknowledges BRGM and the M4CR programme teams for making key project documents, safeguard frameworks, and communication materials available, which formed the empirical basis for this study. Appreciation is also extended to colleagues and reviewers who provided insightful comments on earlier drafts and to the conference organizers for the opportunity to present and refine this work in dialogue with scholars and practitioners working on climate governance, gender equality, and social inclusion. Any remaining errors or interpretations are the sole responsibility of the authors.

Reference

Badan Restorasi Gambut dan Mangrove Republik Indonesia. (2024a, December 18). Lewat M4CR di Sumut, BRGM percepat pelaksanaan rehabilitasi 6.078 hektar mangrove. *Kilas Badan Negara – Kompas.com*.

Badan Restorasi Gambut dan Mangrove Republik Indonesia. (2024b, September 18). Manfaat rehabilitasi mangrove untuk kesejahteraan masyarakat lewat silvofishery. *Kilas Badan Negara – Kompas.com*.

Crenshaw, K. (1989). Demarginalizing the intersection of race and sex: A Black feminist critique of antidiscrimination doctrine, feminist theory and antiracist politics. *University of Chicago Legal Forum, 1989*(1), 139–167.

Creswell, J. W., & Poth, C. N. (2018). *Qualitative inquiry and research design: Choosing among five approaches* (4th ed.). SAGE.

Denzin, N. K., & Lincoln, Y. S. (Eds.). (2018). *The SAGE handbook of qualitative research* (5th ed.). SAGE.

Fischer, F. (2003). *Reframing public policy: Discursive politics and deliberative practices*. Oxford University Press.

Grindle, M. S. (Ed.). (1980). *Politics and policy implementation in the Third World*. Princeton University Press.

Indonesia–Pacific Blue Carbon Partnership. (2023, February 23). *Blue carbon: Opportunities for Indonesia and lessons learned*

Lipsky, M. (1980). *Street-level bureaucracy: Dilemmas of the individual in public services*. Russell Sage Foundation.

Ministry of Environment and Forestry, & Peatland and Mangrove Restoration Agency. (2022). *Environmental and Social Management Framework (ESMF): Mangroves for Coastal Resilience Project (P178009).* Ministry of Environment and Forestry & Peatland and Mangrove Restoration Agency.

Ministry of Environment and Forestry. (2021). *National Mangrove Map Year 2021* [Map]. Ministry of Environment and Forestry, Republic of Indonesia.

Patton, M. Q. (2015). *Qualitative research & evaluation methods: Integrating theory and practice* (4th ed.). SAGE.

Peatland and Mangrove Restoration Agency. (2024). *Inception report: Grievance redress mechanism (Mangrove for Coastal Resilience Project/M4CR).* Author.

Peatland and Mangrove Restoration Agency. (2024c). *[Layanan Pengaduan Mangrove for Coastal Resilience (M4CR)].* Peatland and Mangrove Restoration Agency.

Pressman, J. L., & Wildavsky, A. (1973). *Implementation: How great expectations in Washington are dashed in Oakland; Or, why it's amazing that federal programs work at all*. University of California Press.

Ramadhan, D. A. (2025). *Incubation business through the mangrove for Coastal Resilience (M4CR) project by Peat and Mangrove Restoration Agency (BRGM RI)* (Undergraduate thesis). Universitas Islam Indonesia.

Shackleton, S. E., Cobban, L., & Cundill, G. (2014). A gendered perspective of vulnerability to multiple stressors, including climate change, in the rural Eastern Cape, South Africa. *Agenda, 28*(3), 73–89.

United Nations Development Programme. (2021). *UNDP gender equality strategy: 2020 annual report*. United Nations Development Programme.

United Nations Development Programme. (2021). *UNDP gender equality strategy: 2020 annual report*.

Wagenaar, H. (2007). Interpretation and intention in policy analysis. In F. Fischer, G. J. Miller, & M. S. Sidney (Eds.), *Handbook of public policy analysis: Theory, politics, and methods* (pp. 429–443). CRC Press.

World Bank. (2021). *Fostering the inclusion of disadvantaged and vulnerable individuals or groups in project-level grievance mechanisms*. World Bank.

World Bank. (2022). *Mangroves for Coastal Resilience Project (P178009): Project appraisal document (Report No. PAD4757).*

World Bank. (2024, December 19). *Mangroves for Coastal Resilience Project (P178009): Implementation status & results report (ISR01694).* World Bank.

World Bank. (2024, May 16). *Implementation status & results report: Mangroves for Coastal Resilience Project (P178009)* (Report No. ISR00493). World Bank.

Yanow, D. (1999). *Conducting interpretive policy analysis*. SAGE.