

Grievance Redress Mechanism (GRM) 2025



**Royal Society For Protection of Nature
Thimphu**



Preface

The Royal Society for Protection of Nature (RSPN) is committed to upholding the highest standards of transparency, accountability, and social responsibility in all aspects of its work. As an organization dedicated to environmental conservation and sustainable development, we recognize that our success depends on fostering a culture of trust, fairness, and inclusivity, both within RSPN's internal operations and in our engagements with communities, partners, and stakeholders.

This Grievance Redress Mechanism (GRM) is a reflection of RSPN's unwavering commitment to continuous improvement and responsible governance. It has been developed aligning with international best practices and relevant Laws of the country and RSPN's internal policies. It provides a structured, responsive, and survivor-centered process for handling grievances at both the institutional and the project level. It is designed to be accessible to all stakeholders, ensuring that concerns, whether related to staff conduct, financial integrity, gender equity, or environmental and social safeguards are addressed in a fair, impartial, and timely manner.

The GRM encourages all RSPN employees, partners, communities, beneficiaries and stakeholders to use this mechanism in the best possible manner and engage actively in shaping a more equitable, transparent, and ethical working environment. RSPN remains committed to periodic reviews and updates of this mechanism to adapt to evolving needs, regulatory requirements and stakeholder feedback. With the GRM put in place and operational, we move closer to our vision of a just and sustainable future for Bhutan and beyond.

(Chairperson)

Royal Society for Protection of Nature (RSPN)

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Acronyms

AF:	Adaptation Fund
AML:	Anti-Money Laundering
AMLCO:	Anti-Money Laundering Compliance Officer
CFT:	Countering Financing of Terrorism
CSO:	Civil Society Organization
EDD:	Enhanced Due Diligence
ESSF:	Environmental and Social Safeguards Framework
FID:	Financial Intelligence Department, Royal Monetary of Bhutan
GCF:	Green Climate Fund
GRM:	Grievance Redress Mechanism
KYC:	Know Your Customer
ML:	Money Laundering
PEP:	Politically Exposed Person
RSPN:	Royal Society for Protection of Nature
SEAH:	Sexual Exploitation, Abuse and Harassment
STR:	Suspicious Transaction Reports
TF:	Terrorism Financing

Definition

AML/CFT Violations: Activities indicating money laundering or financing of terrorism, as defined in the RSPN AML/CFT Policy.

Category A/B/C Projects: Refer to RSPN's ESSF classification. Category A projects have potentially significant adverse impacts; Category B, limited adverse impacts; Category C, minimal or no adverse impacts.

Grievance: A formal complaint or concern raised by an individual, group, or entity about potential or actual harm resulting from RSPN's policies, activities or staff conduct.

SEAH (Sexual Exploitation, Abuse, and Harassment): Includes any act or attempted act of sexual exploitation, physical intrusion, or harassment under unequal or coercive circumstances.

1. **Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes. This includes profiting monetarily, socially or politically from the exploitation of another person's sexuality or body.
2. **Sexual Abuse:** Actual or threatened physical intrusion of a sexual nature (e.g., sexual assault), whether by force or under coercive or unequal conditions.
3. **Sexual Harassment:** Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature that interferes with work is made a condition of employment, or creates an intimidating or offensive environment.

Survivor: A person who is or has been subjected to exploitation, abuse, or harassment, including sexual misconduct.

Survivor-Centered Approach: Ensuring that individuals who report or experience SEAH are heard, respected, and safeguarded throughout the investigation process.

Whistleblower: Any individual: employee, contractor, partner, or communities reporting actual or suspected fraud, corruption, SEAH, or other misconduct in good faith.

1. Introduction

The RSPN, as Bhutan's leading Civil Society Organization (CSO) in environmental conservation, is committed to upholding the highest levels of transparency, equity, and accountability in all its operations. The GRM forms a critical pillar of RSPN's governance framework, ensuring that stakeholders including employees, partners, communities, beneficiaries, donors and the general public can voice concerns, disputes or complaints about RSPN's actions, projects or staff conduct, and receive fair and timely resolutions.

The GRM consolidates and draws inspirations from national laws, including Labour and Employment Act of Bhutan 2007, Anti-corruption Act of Bhutan (Amendment 2022), Audit Act of Bhutan 2018, the existing internal policies of RSPN, and international policies relating to grievance redressal.

2. Scope

The scope of the GRM covers two levels: Institutional and Project levels.

2.1. Institutional-Level

2.1.1. Covers RSPN's internal governance, including staff conduct, human resource disputes, whistleblower allegations, financial mismanagement or corruption, AML/CFT concerns, and compliance with RSPN's internal policies

2.2. Project-Level

2.2.1. Covers complaints or disputes arising from RSPN-funded or implemented projects. The grievance may typically include the following:

2.2.1.1. Environmental and social impacts;

2.2.1.2. Gender-based grievances, especially those referencing the RSPN Gender Policy;

2.2.1.3. SEAH allegations in field operations or community engagements;

2.2.1.4. Non-compliance with the RSPN Environmental and Social Safeguards Framework (ESSF) and other internal policies.

2.3. Limitation

2.3.1. This GRM does not replace formal judicial and serious offence which may be dealt as per the Laws of the country.

2.3.2. The GRM does not override an individual's right to seek other legal or administrative remedies.

3. Objectives

3.1. Provide a Comprehensive Framework

3.1.1. Develop and institutionalize standardized approaches so that all complaints, whether environmental, social, gender, AML/CFT or financial are handled systematically.

3.1.2. Provide internal stakeholders such as RSPN staff and the Board and external stakeholders, including local communities, donors, government agencies with clear guidelines on how to raise, record, and resolve grievances.

3.2. Strengthen Accountability and Transparency

3.2.1. Reinforce institutional integrity by ensuring that processes for addressing grievances follow best practice and standards and non-compliance are held accountable.

3.2.2. Guarantee open disclosure of redressal outcomes while maintaining confidentiality for sensitive cases.

3.3. Ensure Timely Redress

3.3.1. Set specific timelines so that grievances are not left unresolved, which helps build stakeholder confidence.

3.4. Protect Whistleblowers and Vulnerable Groups

3.4.1. Integrate non-retaliation and confidential channels, especially for allegations of Sexual Exploitation, Abuse and Harassment (SEAH), corruption, or money laundering.

3.4.2. Provide targeted support for survivors of harassment or sexual violence.

3.5. Promote Accessibility and Inclusivity

3.5.1. Reduce barriers to lodging complaints by offering multiple submission channels: in-person, email, online portals, or suggestion/complaint boxes available at RSPN Head Office and Field Offices.

3.5.2. Provide adaptations for individuals with low literacy or limited language fluency, ensuring broad community participation.

4. Guiding Principles

4.1. Legitimacy

4.1.1. The GRM shall be formally mandated and overseen by a recognized authority within RSPN.

4.1.2. Management Team shall act as Grievance Committee.

4.1.3. RSPN shall designate a Grievance Focal Person to deal with any matter relating to grievances.

4.2. Accessibility

4.2.1. Ensure that vulnerable groups such as women, youth, persons with disabilities or remote communities have easy access to the GRM.

4.2.2. The process shall not impose financial or geographical burdens that might deter individuals from submitting grievances.

4.2.3. The RSPN's GRM shall resolve most grievances within a maximum of 60 days, except in cases of SEAH and major environmental harm which may require more urgent or specialized procedures.

4.3. Predictability

4.3.1. Provide standard response timelines for each stage: acknowledgment, initial assessment, in-depth investigation and final resolution.

4.3.2. Provide clear processes and protocols of GRM so that complainants are aware in terms of next steps.

4.4. Fairness

4.4.1. Impartial investigations are conducted, using evidence-based approaches.

4.4.2. Decision-makers and relevant committees in the process shall not have conflicts of interest or bias regarding the grievance.

4.5. Confidentiality and Protection

4.5.1. Anonymous submissions are allowed, especially in SEAH or corruption allegations. However, the GRM encourages receiving contact details for further probing. The contact details shall be kept under strict confidentiality. Whistleblowers are not obligated to reveal their identity if they fear retaliation.

4.5.2. Whistleblowers and survivors must not face retaliation, disciplinary action, or intimidation.

4.5.3. RSPN shall not share personal information without explicit consent, except where legal obligations demand it.

4.5.4. RSPN shall enforce a strict policy that prohibits retaliation against a whistleblower who reports or testifies about wrongdoing.

4.5.5. Attempts to intimidate or punish a whistleblower shall be subject to disciplinary action, including possible termination of the retaliating staff member or partner entity.

4.6. Records and Data

All complaints including SEAH/whistleblower case files are stored in a secure, access-restricted repository (digital or physical), only accessible by authorized staff.

5. Public Disclosure

RSPN may publicly disclose case statistics when required, but without revealing identities or sensitive details.

5.1. Legal Compliance

The GRM shall respect relevant international standards and National Laws.

5.2. Transparency and Accountability

5.2.1. While respecting confidentiality, RSPN issues periodic summary reports on the number and types of grievances, duration taken for resolution, and general outcomes which will be uploaded on Website

5.2.2. The GRM Focal Person or committee logs each complaint meticulously for auditing or third-party reviews.

5.3. Review and Improvement

5.3.1. Regular reviews of the GRM are conducted to incorporate lessons learned, adapt to national regulations, or comply with updated guidelines of relevant institutions.

5.3.2. Training modules and awareness workshops are provided to adapt to new policies and best practices.

6. Grievance Redress Structure

6.1. The GRM Focal Person shall be the first interface on any matter relating to grievances or complaints. The GRM Focal Person shall be responsible for:

6.1.1. Receiving and logging complaints and opening the complaints/grievances.

6.1.2. Conducting initial screenings, including opening of **Suggestion/Grievance Box** periodically and updating accordingly.

6.1.3. Liaising with local community representatives, women and youth groups.

6.1.4. Coordinating with the RSPN Management Team if complex issues arise.

6.1.5. Coordinating any meetings on GRM.

6.2. The GRM Focal Person shall closely liaise with the Gender Focal Person (Designated as per Gender Policy) for any matters related to gender

6.3. RSPN's grievances redressal are categorized into two: Institutional and Project levels (*Refer Grievance Redressal Flow-charts in the following pages*).

Grievance Redressal at Institutional Level

Complainants file complaints in-person, writing, email, GRM Portal, Suggestion/Grievance Box both at Head Office and Field Offices.

Log and Acknowledge: Turn-Around-Time (TAT) 5 Business Days

- GRM Focal Person records the complaints in RSPN's Grievance Registry and ask to provide contact details of complainant, which shall be maintained with strict confidentiality.
- Complainant receives a written acknowledgement within 5 business days.

Tier 1: Management Level: TAT 10-15 Business Days

- **Initial Review:** Head of the Department review documents and seek informal resolution.
- **Decision/Resolution:** A recommended resolution is proposed within 10 business days of acknowledgement. If the resolution is accepted, the case is closed.
- **Escalation:** If unresolved or if the complaint directly implicates the Department, the grievance escalates to the Management Team.
- **Investigation:** A formal investigation may involve reviewing documents, interviewing witnesses, or consulting RSPN's legal counsel together with Human Resource Committee (HRC).
- **Response:** Management Team issues a written decision within 15 business days of receiving the escalation, detailing corrective measures, timelines, and next steps.
- **Possible Outcomes:**
 - **Resolved:** The complainant agrees with the management's decision and the complaint is closed.
 - **Unresolved:** The complainant disagrees with management's decision and escalates to Tier 2.

Tier 2: RSPN Board: TAT 30 Business Day

- **High-Level Deliberation:** Board convene a special session/collect more evidence/consult external experts.
- **Final Decision:** Decision shared within 30 business days from the receipt of grievance.
- **Possible Outcomes:**
 - **Resolution:** If Board's decision is accepted, the complaint is closed. If dissatisfied, complainant may seek judicial, or other legal remedies.

Documentation and Closure

- Once a resolution is passed at any tier, GRM Focal Person records the outcomes in the Grievance Registry.
- GRM Focal Person issues a "Closure Letter" outlining the resolutions to the complainant.

Grievance Redressal at Institutional Level

- Complainants file complaints in-person, writing, email, GRM Portal, Suggestion/Grievance Box both at Head Office and Field Offices.



Log and Acknowledge: Turn-Around-Time (TAT) 5 Business Days

- GRM Focal Person records the complaints in RSPN's Grievance Registry and ask to provide contact details of complainant, which shall be maintained with strict confidentiality.
- Complainant receives a written acknowledgement within 5 business days from the receipt of complaint.



- GRM Focal Person checks the severity and nature of the grievances and assess risk (example of High-Risk includes cases involving SEAH/major environmental harm/suspected fraud/corruption).
- Based on the risk, GRM Focal Person conducts a preliminary fact-finding or initial assessment:
- GRM Focal Person may consult project steering committee (PSC) where applicable and conduct project site visit to gather more information and evidences.
- Resolution: If a consensus/simple remedy is readily apparent, GRM Focal Person proposes a solution within 14 business days from the receipt of complaint. If dissatisfied with the proposed.



Tier 2: RSPN Board: TAT 30 Business Day

- High-Level Deliberation: Board convene an inter-sessional or collect more evidence or consult external experts.
- Final Decision: Decision shared within 30 business days from the receipt of grievance.
- Possible Outcomes:
- Resolution: If Board's decision is accepted, the complaint is closed. If dissatisfied, complainant may seek judicial, or other legal remedies.



Documentation and Closure

- Once a resolution is passed at any tier, GRM Focal Person records the outcomes in the Grievance Registry.
- GRM Focal Person issues a "Closure Letter" outlining the resolution to the complainant.

7. Whistleblower and SEAH Protections

7.1. Whistleblower Protection

7.1.1. Good Faith: A complaint must be made with reasonable belief in its truth. Malicious or baseless complaints may result in disciplinary actions after a fair investigation.

7.1.2. Right to Anonymity: Whistleblowers can opt to remain anonymous, although providing contact details may help with follow-up.

7.1.3. Non-Retaliation: Any retaliation against a whistleblower is grounds for disciplinary action.

7.2. SEAH (Sexual Exploitation, Abuse, and Harassment)

7.2.1. Zero-Tolerance Policy: RSPN shall not tolerate sexual exploitation, abuse, or harassment in any form, in both institutional and project contexts.

7.2.2. Reporting and Prioritization: All staff are obligated to report known or suspected SEAH to the GRM Focal Person or a higher authority immediately.

7.2.3. Survivor Support:

7.2.3.1. Survivor Safety: If there is perceived danger, the alleged perpetrator may be removed from the area or reassigned to protect the survivor.

7.2.3.2. Confidential Support: RSPN can provide or arrange:

7.2.3.2.1. Psychosocial counseling or medical assistance, if required.

7.2.3.2.2. Safe spaces or discrete meeting locations for the survivor.

7.2.3.2.3. Legal guidance if the survivor wishes to pursue criminal or civil action.

7.2.4. Survivor's Choice: RSPN respects the survivor's decision to proceed or not to proceed with certain actions, ensuring a do-no-harm approach throughout.

8. Integration of AML/CFT Reporting

8.1. Lodge complaint with GRM Focal Person on any suspicion of money laundering, terrorism financing, or other financial misconduct.

8.2. The GRM Focal Person shall direct such cases to RSPN's AML Compliance Officer (AMLCO).

8.3. RSPN's AMLCO shall redress the grievance following the grievance redress mechanism and AML/CFT Policy.

9. Integration of AML/CFT Reporting

9.1. Grievance Registry and Database

9.1.1. Maintain a centralized system or spreadsheet to log details: date, nature of grievance, parties involved, and resolution outcomes.

9.1.2. Each complaint shall be assigned a separate reference ID to facilitate tracking.

9.2. Regular Internal Reviews

9.2.1. The GRM Focal Person shall compile monthly or quarterly updates on open and closed cases.

9.2.2. The GRM Focal Person shall prepare and share the summarized report including repeated cases or complaints if any and resolutions thereof with the Management Team.

9.2.3. The Management Team shall monitor the effectiveness of GRM including changes in grievance submission rates, resolution times and community satisfaction levels.

9.3. Annual Public Report

RSPN shall prepare and include anonymized data on the number and types of grievances, average resolution times, lessons learned and any broad policy changes initiated because of these complaints.

9.4. Adaptive Management and Policy Revision

If a pattern of complaints and feedback on GRM indicates a structural policy gap, RSPN may modify its internal policies and operational frameworks based on the need.

9.5. Independent Audits or Evaluations

RSPN Board or any third-party including donors may commission external audits to ensure compliance, correctness, and efficacy of the GRM. Recommendations from such audits feed into the next iteration of the GRM.

10. Capacity Building and Awareness

10.1. Staff Training

10.1.1. RSPN shall organize orientation and refresher courses at least once a year, covering GRM procedures, relevant national Laws, whistleblower protections, and how to handle SEAH allegations.

10.1.2. Additional targeted training or capacity development may be scheduled if certain issues persist.

11. Publicity and Outreach

11.1. RSPN shall sensitize project partners, beneficiaries and local communities about the RSPN's GRM including its processes, submission channels, and their right to file grievances without fear of reprisal and protection mechanisms.

11.2. Where needed, RSPN may translate simplified versions of the GRM into local dialects for better outreach and advocacy.

12. Effective Date and Revision

12.1. This GRM comes into force from July 1, 2025.

12.2. Revisions may be made in response to changes in the national and international standards and requirements and lessons learned from annual reviews or external audits.

12.3. The GRM Focal Person shall coordinate and conduct periodical review and update the policy text when needed.

Annexes

Annex 1: Grievance Form

Annex 2: Sample Grievance Registry Form

Annex 1: Grievance Form

Instructions for Filling Out This Form

Purpose of the Form

Use this form to report any concern, complaint, or dispute related to RSPN's activities, whether in the workplace or in project areas.

Anonymity and Confidentiality

If you prefer to share your name and contact details, RSPN will handle your information with strict confidentiality, only disclosing it if legally required or if necessary to address the grievance.

Accuracy and Supporting Evidence

Provide as many facts as you can (dates, times, places, documents, photos, etc.) to aid the investigation.

Indicate any witnesses who might verify your account. This helps ensure a fair and efficient resolution.

How to Submit

- You may submit your completed form in person (to an RSPN official or the GRM Focal Person), by email, via the RSPN website, or through an official suggestion/grievance box available at the RSPN head office and field offices.
- Upon receipt of the grievance, RSPN will acknowledge your submission within 5 business days (if you have provided contact details).
- In Person: Hand-deliver this form to your GRM Focal Person or any RSPN staff, RSPN Head Office or field offices.
- Email: Send a scanned copy or typed version of the duly filled form to GRM Focal Person at complaints@rspnbhutan.org
- Online Portal: Grievance can also be lodged online through the portal [RSPN Complaints/Grievance Form](#) –which has an option to submit additional documents.
- Suggestion / Grievance Box: Place the completed form in a sealed envelope if you wish anonymity.

Grievance Form

Complainants Information

Name (Optional):

Contact Details (to be kept confidential): (Phone, Email, or Address)

Tick () one:

I wish to remain anonymous.

I am willing to be contacted to discuss the grievance.

Preferred Mode of Response (if not anonymous): (e.g., phone call, email, in-person)

Date of Submission

(DD/MM/YYYY)

Relationship to RSPN

(Check or circle the category that applies to you)

RSPN Employee / Staff

Contractor / Consultant

Community Member / Beneficiary

Partner Organization Representative

Donor / Sponsor

Other (please specify)

Project/Program Involved

Name of the RSPN project, program, or location related to your concern

Description of the Grievance

Please describe grievance events and issues in chronological order, referencing any specific project tasks or workplace scenarios.

Who is involved? (Name or roles of those you believe are responsible or affected.)

When and where? (Dates, times, and locations relevant to the grievance.)

Are there any witnesses or supporting documents? (Indicate who else might corroborate or provide additional information.)

(Attach relevant documents, photos, or any other evidence if available.)

Impact

Describe how this issue affects you or the community.

If it's an environmental or social issue, specify potential or actual harm to health, livelihood and biodiversity

If it's a workplace issue, specify the negative effect on your job, safety, or well-being.

Previous Efforts to Resolve

Have you tried to address this concern with anybody (supervisor, management, local committee) before submitting this form?

If yes, who did you speak with and what was the outcome?

Preferred Outcome or Remedy *(Optional)*

Please share if you have a view on how you would like to see the issue resolved or corrected.

Additional Information or Remarks

Any other details, suggestions, or relevant points that might help RSPN handle your grievance effectively.

Signature *(Optional if you wish to remain anonymous)*

Signature or initial:

Date:

Next Steps and Points of Contact

Confirmation of Receipt: If you have provided contact information, you will receive a written or verbal acknowledgment within 5 business days.

Confidentiality: All details will be handled in strict confidence, consistent with GRM.

Investigation Timeline: RSPN aims to provide an initial response or proposed resolution within 14 business days. Complex grievances, however, may require additional time, but the aim is a final resolution or update within 60 days wherever possible.

Follow-Up: You may be contacted by the GRM Focal Person if more information or clarification is needed.

Further Escalation: If you are not satisfied with the proposed resolution, you can escalate the grievance to the next level within RSPN

Annex 2. Sample Grievance Registry Template

Purpose of the Grievance Registry

Central Tracking: To establish a single, organized location where all grievances whether internal or external are logged and monitored.

Transparent Monitoring: Ensures that no complaint is overlooked; each receives a unique identifier and clear record of actions taken.

Reporting & Accountability: Simplifies the process of generating regular updates or summary data (e.g., for annual reports, donor requirements, or audits).

Continuous Improvement: Provides a historical record of the types of issues encountered, which can guide RSPN leadership in policy refinements or additional staff training.

Registry Format Sample

A digital spreadsheet or a physical logbook can serve as the registry. Below is a sample table with recommended columns and an explanation of each column's purpose. Adjust fields as needed to match RSPN's specific processes or compliance needs.

Field/Column	Description	Entries
Case ID	Unique reference number assigned sequentially or by year.	
Date Received	The exact date the complaint was first submitted or recorded.	
Complainant Name	Name of the person(s) lodging the complaint. If anonymous, record "anonymous" or a code.	
Contact Information	For non-anonymous complaints, any phone, email, or address that can be used for updates.	
Relationship to RSPN	Indicates if the complainant is an Employee, Community Member, Donor, Contractor, etc.	
Date Acknowledged	When RSPN (Focal Person) formally acknowledged receiving the complaint.	
Type of Grievance	Classify by category: SEAH, Workplace misconduct, Environmental, AML/CFT, etc.	
Brief Description	Short summary of the issue.	
Assigned to	The name/position of the staff or committee handling the complaint initially (Tier 1 or Focal Person).	
Action Taken so Far	Key steps or communications to address the grievance (e.g., site visits, interviews, mediation).	
Status	Current status of the case: Open, In Review, Under Mediation, Resolved, Closed, etc.	
Resolution / Outcome	If resolved, a short note on the final decision or remedial action.	
Date Resolved	The date on which a final resolution was reached and communicated.	
Remarks / Next Steps	Any additional notes, follow-up needed, or references to external processes.	



RSPN

*Inspiring personal responsibility for
environmental conservation since 1987*

Royal Society for Protection of Nature

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