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ENGAGING

PUBLIC DEVELOPMENT BANKS

Case Studies of the African Development Bank, Asian Development Bank and Inter-American Development Bank

Prepared by

Amanda Lucey



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Executive Summary



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In the last few decades, Public Development Banks (PDBs), otherwise known as Development Financing Institutions (DFIs), have proliferated around the globe. While their stated intention is often to fight poverty, promote people-centred development and to bring about social change, these institutions have highly problematic accountability paradigms, which can result in the opposite consequences. Primarily, the problem lies in the division of responsibility between the Bank and the Borrower, which is further complicated in situations where there are multiple financiers and intermediaries. While PDBs are meant to uphold international human rights and business standards, they all too often shift the blame towards the client. When clients come from authoritarian or repressive contexts, there is limited will to uphold these standards. Development projects that are carried out without proper due diligence, often to save costs, can cause displacement, a loss of livelihood and leave communities without remedy. As a result, PDBs may be even more powerful than sovereign governments, driven by private capital and geopolitical interests that only enrich the elite. However, civil society is now making inroads in documenting the negative effectives of policy and practice, bringing into question the need for the overall reform of these institutions.

This report is commissioned by Forus, a global network that brings together national and regional civil society organisations (CSOs)/coalitions to empower civil society for social change. Forus is the CSO coordination lead for the [Finance in Common Summit \(FICS\)](#), an initiative that brings together more than 500 PDBs to work together on addressing sustainable development and climate change.

Given this mandate, this report shows how CSOs can effectively engage with PDBs based on the valuable insights and lessons learnt of CSO networks in Africa, Asia and Latin America. Specifically, the study analyses civil society engagement with the African Development Bank (AfDB), the Asian Development Bank (ADB) and the Inter-American Development Bank (IDB) in terms of their frameworks, policies and projects. To complement this report, Forus has created an accompanying Toolkit on engaging PDBs, a practical guide for CSOs to learn how and why it is important to engage PDBs, with practical tips on PDB entry points, strategies, approaches and lessons learnt.

The report first analyses the AfDB. Here, the Bank has developed institutional frameworks for engagement through its Framework for Enhanced Engagement with Civil Society Organisations (CSOs). Primarily, engagement has been through AfDB-CSO forums. These were separate events from the annual meetings, but regularly organised. However, the forums have been criticised as partnership meetings rather than platforms for meaningful and critical dialogue with the AfDB's decision-makers. Nevertheless, they have provided opportunities to demand inclusion in policy making, to make projects and accountability mechanisms more accessible and inclusive for communities, and to involve CSOs in project design.

The AfDB Civil Society Committee, first established in 2000, was revitalised in 2018 after it was found that the Committee lacked influence in strategic decisions and in representation. New terms of reference were developed for the latest intake of members, but it is too early to tell how effective these engagements will be. Meanwhile, the AfDB CSO Working Group has continued to engage the Bank through collective statements. In 2023, civil society began to advocate for their inclusion in the annual meetings, particularly as the meetings that year were held in Egypt, where civic space is restricted. In the 2024 meetings in Nairobi, civil society faced challenges that limited their full participation. CSOs have submitted collective statements with suggestions to the AfDB on institutional arrangements for future annual meetings. These have included thematic CSO-led sessions, a CSO roundtable discussion with AfDB Executive Directors and a CSO town hall meeting with AfDB Senior Management.

The Bank is slowly beginning to engage CSOs in country strategies, but the level of this engagement depends on the country concerned and the openness of civil space. The Access to Information Policy was developed with minimal consultation, and although the Bank claims this is in line with the Access to Information policies of most other PDBs, an evaluation of AfDB activities by the Accountability Project found that the Bank fell short of its commitments in practice. The Integrated Safeguards System (ISS) Policy was also developed with minimal consultation, which led civil society to submit a letter calling the consultations a 'tick-box exercise'. CSO recommendations included a greater monitoring role for the Bank (including for project-level grievance mechanisms but also more broadly), a stand-alone Indigenous person's policy, more inclusion of marginalised groups, more steps to address reprisals, better stakeholder engagement and measures for remedy.

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Engagement

Civil society has requested greater independence in those overseeing project-level grievance mechanisms, greater accessibility to the IRM and standards on ensuring remedies in line with the UN Guiding Principles on Business and Human Rights (UNGPs).

In terms of engagement with the AfDB's Independent Recourse Mechanism (IRM), civil society has made some headway in bringing cases to the Mechanism, raising awareness on community issues, and in some instances, securing some form of compensation. However, the nature of this engagement illustrates that too much responsibility is still placed on the Borrower for accountability, and this in authoritarian contexts can be highly problematic. Civil society has requested greater independence in those overseeing project-level grievance mechanisms, greater accessibility to the IRM and standards on ensuring remedies in line with the UN Guiding Principles on Business and Human Rights (UNGPs). Promisingly, the IRM intends to appoint trusted advisors who can work with communities, while engaging donors to provide grants for these organisations. The IRM has also developed an anti-retaliation toolkit.

An evaluation by the AfDB recommended that the Bank enhance awareness and a common understanding of the purpose of and potential value added by civil society, enhance the resourcing approach for effective implementation of CSO engagement, and strengthen CSO in policy dialogue at the country and regional levels. It also proposed that the strategy for civil society engagement from 2023-2028 encompass a strategic document, action plan, a CSO financing mechanism, a Monitoring and Evaluation (M&E) tracking system and a communication plan. To date, this appears not to have been implemented.

At the ADB, civil society engagement has been consistent and systematic since the Non-Governmental Organisation (NGO) FORUM on the ADB was reorganised in 1997. The FORUM boycotted the Annual Meeting in 2001. The Bank subsequently established the NGO and Civil Society Centre (NGOC) and instituted a CSO panel at the Annual Meeting. The ADB now has three parts to its programme including meeting with Members of ADB Senior Management, civil society panel discussions and 'Learning with Partners', which showcases CSO work. The ADB's NGO policy dates back to 1998 and treats NGOs primarily as contractors, rather than critical forces to engage with.

From 2015, the NGO Forum became more forceful with its challenges to the ADB, including campaigns to challenge its immunity due to the lack of mechanisms available to hold it accountable for any harm caused. The Forum has also held meetings, published photo books to highlight the ADB's destructive projects and run campaigns, such as those related to decarbonising the ADB and others demanding a complete overhaul of its safeguards policy. Civil society has tried an inside and outside approach, with a massive presence on social media. A huge success came when the ADB announced it would stop funding coal in 2021. However, CSOs continue to produce investigations that demonstrate that the ADB is going back on its word.

The Reality of Aid network also used the opportunity of the ADB Strategy 2030 mid-term review in 2024 to engage the Bank on failing to uphold the principles of development effectiveness, submitting a collective statement from 130 organisations. Alongside this, the NGO Forum has suggested that Strategy 2030 shifts accountability to country safeguards, meaning that the client is held responsible for environmental and social issues, rather than providing an opportunity for the ADB to take on a greater monitoring role in ensuring that countries adhere to the ADB safeguards policy. There has been some engagement on country strategies, but it is also unclear how effective this has been.

Civil society continues to insist that the ADB's Access to Information Policy remains couched with exemptions, overrides and vetoes, including exceptions for accessing information from third parties. Similarly, the Safeguards Policy does not make provision for timebound, mandatory, and compliant standards, with flexibility in the application of borrower systems. The standards have been diluted through a Mitigation Hierarchy approach, allowing borrowers to bypass Environmental Impact Assessments (EIAs) and Social Impact Assessment (SIAs) prior to board approval for high and medium-risk projects. Meanwhile, the common approach applicable to co-financing of projects between ADB and other MDBs may mean lower than usual standards when projects are financed. The Policy is also gender blind.

The Accountability Mechanism (AM) is also problematic and lagging behind in practice, since the ADB's Office of Special Project Facilitator is not independent from the management and is required to report to the President. Communities are also required to engage the Operational Department in 'good faith' prior to accessing the AM. This is a highly ambiguous term that restricts the eligibility of organisations. In addition, ADB does not consult communities on the Management Action Plan prior to board approval. The Bank also does not incorporate the principle of Free, Prior, and Informed Consent when engaging with Indigenous communities and does not consult communities regarding remedial action plans.

The ADB Public Relations Department issues annual reports that describe the ADB's meaningful engagement with CSOs that implement ADB-funded projects as contractors, but these would naturally be more biased in favour of the ADB, rather than retaining a critical stance.

At the IDB, a change of administration in 2022 has finally allowed civil society to make greater inroads for engagement. An informal coalition became a working group in 2019, leading their attendance at an Annual Meeting for the first time in 2023. In 2024, CSOs participated in IDB Annual panel discussions for the first time. The IDB's Action Plan for Implementation of the IDB Group-Civil Society Engagement Strategy for Operations and Initiatives (2019-2021) now offers to develop the role of civil society consultative groups and for greater civil society engagement in country strategies and the mainstreaming of a gender perspective.



Engagement on the Access to Information Policy at the IDB was extremely limited in 2019. It is now reviewing the policy, and CSOs have called for higher-level commitments to human rights, greater accessibility to information, timebound commitments to disclosing information with specific formats and channels, avoidance of language ambiguity, removing the country specific information exception, and giving the Access to Information Committee and the External Review Panel a monitoring system for the disclosure of information.

Civil society has had more success in engaging the IDB on its safeguards. The Environmental and Social Policy Framework (ESPF) now includes more than 60 recommendations articulated by the CSO coalition in the Working Group's (WG) joint documents. The most relevant recommendations are: an exclusion list; a commitment not to tolerate reprisals; strengthened requirements for IDB's monitoring and supervision and due diligence; clearer roles and responsibilities for IDB and borrowers; specific protections for marginalised groups; strengthened requirements for the identification of environmental and social risks and impacts; adoption of child labour standards; and that biodiversity offsets are not an acceptable mitigation measure in instances of critical habitat. The ESPF now includes a standalone safeguard policy on stakeholder engagement. The new policy also includes a reference to the Regional Agreement on Access to Information, Public Participation and Justice in Environmental Matters in Latin America and the Caribbean (Escazu agreement), the first legally binding instrument in the world to include provisions on environmental human rights defenders and is also the first environmental agreement adopted in Latin America and the Caribbean, and requirements on reprisals and retaliation.

Civil society began engaging the IDB's Independent Consultation and Investigation Mechanism (MICI) on its policies between 2009-2014. As a result of civil society engagement in 2018, the Consultation Phase Guidelines for MICI have incorporated civil society recommendations. An evaluation by the IDB has now noted several shortcomings of MICI in terms of independence, restrictions on eligibility and a lack of corrective action for communities.



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The new ESPF includes language to instruct Borrowers to provide project-affected people with information about MICI, in addition to the project grievance mechanism and clarifies that access to the MICI is not contingent on the exhaustive use of the project grievance mechanism. Civil society has, however, urged the IDB to provide concrete guidance on how to structure or operate an effective grievance mechanism at the project level based on the UN Guiding Principles on Business and Human Rights. Civil society advocacy has also led to complaints being investigated and taken seriously at MICI, with some recommendations for remedy.

In sum, meaningful civil society engagement at the AfDB, ADB and IDB has been somewhat limited in the past, but coalitions and committees have demonstrated the power of collective organisation. CSOs have tried a variety of approaches. These have included trying to influence from within on specific policies through collective statements, providing evidence on the negative impact of projects, assisting communities to lay complaints at Bank-level, independent accountability mechanisms and protesting loudly outside annual meetings, with banners and social media campaigns.

CSOs working at diverse levels (local, national, regional and international) can now band together at a global scale to promote common minimum standards across Bank policies on Access to Information, Safeguards and Accountability Mechanisms, demanding that this falls in line with international best practice and human rights law. One significant platform for CSOs to engage with PDBs is the FICS. Forus facilitates a space that enables CSOs to organise their participation in the FICS, presenting an opportunity for CSOs to leverage the Summit to advocate for CSO policy priorities and improved practices for people and the planet.

PDBs such as the AfDB, ADB and IDB need to reform their models from a top-down approach to a model where community-led and human rights-based operations are the norm, not the exception. CSOs play a critical monitoring role in projects, while supporting communities to lay complaints, and calling for more systematic approaches to remedy, responsible exit plans and greater consideration of indigenous persons. It is critical to link local to global PDB platforms whereby CSOs can work and learn together and with PDBs, track progress, share victories, challenges and formulate solutions in which PDBs move from words of good intent to concrete actions that centre communities, with people – not profit – at the heart of PDB operations.

List of Acronyms



ADB	Asian Development Bank
AfDB	African Development Bank
AIDA	InterAmerican Association for Environmental Defense
AM	Accountability Mechanism of the ADB
AWC	Arab Watch Coalition
BIC	Bank Information Center
CBO	Community-Based Organisation
CIEL	Center for International Environmental Law
CRP	Compliance Review Function
CSO	Civil Society Organisation
CSP	Country Strategy Paper
CSPF	Civil Society Policy Forum
CSS	Country Safeguards System
DAI	Disclosure and Access to Information Policy (of the AfDB)
DFI	Development Financing Institution
EIA	Environmental Impact Assessments
ESF	Environmental and Social Framework (of the ADB)
ESPF	Environmental and Social Policy Framework (of the IDB)
EWS	Early Warning System
FICS	Finance in Common Summit
IAM	Independent Accountability Mechanism
IAP	International Accountability Project

IDB	Inter-American Development Bank
IED	Independent Evaluation Department
IFC	International Finance Corporation
IMF	International Monetary Fund
IRM	Independent Recourse Mechanism
ISS	Integrated Safeguards System
LEAF	Lakes Edward and Albert Integrated Fisheries and Water Resources Management
LSD	Lumière Synergie pour le Développement
MDB	Multilateral Development Bank
M&E	Monitoring and Evaluation
MICI	Independent Consultation and Investigation Mechanism of the IDB
NGO	Non-Governmental Organisation
NGOC	NGO and Civil Society Centre
OCRP	Office of the Compliance Review Panel
OHCHR	Office of the United Nations High Commissioner for Human Rights
OSPF	Office of the Special Project Facilitator
PDB	Public Development Bank
RoA-AP	Reality of Aid-Asia Pacific
RDS	Rural Development Societies
SIA	Social Impact Assessment
SGBV	Sexual and Gender-Based Violence
SEAH	Sexual Exploitation, Abuse and Harassment
WANEP	West African Network for Peacebuilding
WB	World Bank
WG	Working Group
UN	United Nations
UNGP	UN Guiding Principles on Business and Human Rights

01

Introduction



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There are now more than 533 Public Development Banks (PDBs) or Development Financing Institutions worldwide, with more than US\$23 trillion assets and operating in more than 155 countries.¹ PDBs are some of the most powerful actors in the world, operating at the intersection of finance and policy. PDBs are state-owned financial institutions that aim to deliver on public policy objectives.² This means that they often have a strong development mandate. Ideally, they should target finance where it is needed the most, have responsible social and environmental standards and consider gender. They should have strong transparency policies that allow public access to information, and there should be meaningful engagement with civil society. They should also be insulated from political and corporate pressure.³

However, civil society has increasingly documented the negative harms of Bank projects, raising questions over how they are governed, and how they can be held to account. It is therefore useful to document how civil society has engaged with different PDBs to understand their challenges, successes and opportunities. Civil society plays a host of important roles that can meaningfully improve the work of development banks. Civil society engagement with PDBs is important for informing policies and programmes based on local and contextualised information, ensuring ownership by communities on PDB projects, reducing the risk of failure, improving project results, effectiveness and impact and fostering innovation. As contractors, CSOs can optimise resource expenditure and deliver services in hard-to-reach areas. Most importantly CSOs can operate as critical voices, holding PDBs accountable through advocacy and supporting communities to raise awareness, file complaints, or seek remedy for harms.

This report was commissioned by [Forus](#), an innovative global network empowering civil society for effective social change. Forus brings together 69 National NGO Platforms and seven Regional Coalitions from Africa, America, Asia, Europe, and the Pacific. As a network of civil society national platforms and regional coalitions representing over 24 000 NGOs, Forus advocates for a new, equitable global financing model that promotes shared responsibilities and addresses issues like debt and financial stability. With its collective work with members and partners, it aims to transform PDBs to adopt transparent, inclusive practices that prioritise climate, environment, and inequality issues, while opening up spaces for CSOs to meaningfully participate. Forus members are also active in the promotion of human rights-centred development by shifting away from growth-driven models towards just and sustainable economies that are echoed by the 2030 Agenda and the implementation of the SDGs.

Forus and CSO partners work with PDBs at national, regional and global levels to strengthen CSO-PDB relations and to advocate for PDBs to adopt a human rights-based approach. This study seeks to strengthen Forus' member and partner engagement with PDBs by influencing PDB policies, procedures and operations at national, regional and/or global levels. The target audience for this initiative is Forus members; the CSO Informal Mechanism on the Finance in Common Initiative (led by Forus); and all CSOs that have an interest in engaging with PDBs.

Forus currently serves as the CSO coordination lead for the [Finance in Common Summit \(FICS\)](#), an initiative that brings together more than 500 PDBs to work together on addressing sustainable development and climate change. Over the past four years, Forus and CSO partners have worked together to call on PDBs to ensure their projects and policies help achieve the Sustainable Development Goals ([SDGs](#)) and deliver effective climate and biodiversity action in line with the [Paris Agreement](#) and [Kunming-Montreal Global Biodiversity Framework](#) (GBF). This report therefore also offers an opportunity to share experiences of CSO engagement with PDBs at the FICS.

During the 2023 FICS, CSOs developed key recommendations for CSO engagement with PDBs, including the need for PDBs to establish formal CSO engagement mechanisms to ensure inclusive participation in all stages of project cycles. Civil society further called on PDBs to promote civic space and human rights whereby PDBs support transparent information sharing and ensure local community involvement in decision-making related to finance and development. Another important call to PDBs was that they ensure safe spaces for meaningful and inclusive participation, protecting individuals who speak out against projects from reprisals. CSO recommendations can be found in the [2023 Civil Society Declaration at the FICS](#).

In line with the aforementioned work, this research study specifically focuses on three PDBs, namely the African Development Bank (AfDB), the Asian Development Bank (ADB) and the Inter-American Bank (IDB). Firstly, the study analyses each PDB's mandate and objectives, the frameworks for civil society engagement, and civil society engagements across institutional structures. It then analyses their engagement with specific strategies, policies and projects. It also examines any evaluations that have been done on civil society engagement with that particular PDB. The study is based on 20 interviews with representatives from CSO coalitions and working groups, people that work with project-affected communities, PDB officials and representatives from PDB accountability mechanisms and evaluation departments. The report draws some general conclusions, based on an analysis of the three Banks.



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In doing so, it is hoped that this report will provide CSOs with cross-regional knowledge on PDB engagement, especially CSOs and community-based organisations that are interested in engaging with PDBs on their policies and practices for the first time. CSOs engaging with national development banks, which often lack CSO engagement policies and structures, can make use of the knowledge and lessons-learned from CSO networks, who have enormous experience in developing and influencing civil society engagement policies and mechanisms of regional PDBs.

Discover the work of the Forus network

Forus is a horizontal and global network of civil society platforms, advocating for a new, equitable global financing model that promotes shared responsibilities and addresses issues like debt and financial stability. [Learn more about Forus activities in this area!](#)



02

General comments on engaging PDBs



This report highlights the specific engagements of civil society with the AfDB, ADB and IDB. In addition to this study, Forus has developed a **Toolkit** on how to engage PDBs based on the experience, knowledge and lessons learnt of CSO networks engaging with multilateral development banks in three regions highlighted in the study. While this report provides an analysis of CSO engagement with each of these three PDBs in turn, the Toolkit provides CSOs with general guidance and tools with reference to advocacy and policy engagement strategies as well as varied approaches captured in this study. However, from the outset, it is worth noting some broad similarities among PDBs that are used in the analysis of this report, as well as to draw lessons for the Toolkit.

Firstly, the PDBs examined in this report have similar institutional structures, namely a Board of Governors, a Board of Directors and a President. The shareholder structure varies, but it is worth examining those that contribute the largest amounts of money since they have the biggest vested interests. All three PDBs have specific policies on CSO engagement, although the technical details differ. These are also access to information policies and safeguard (environment and social) policies. All three Banks have Accountability Mechanisms (AMs), although in some cases their independence could be strengthened.



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Engagement

There are several levels at which CSOs can engage PDBs.⁴

01

The first of these is the **project level**, where CSOs can monitor projects to assess how their commitments on paper play out in real life. They can also engage with project-affected communities and share findings with relevant government and project team staff.

02

At a national level, CSOs can engage with the country offices; advocate at the national level (Parliament, Ministries of Finances); participate in consultations throughout project cycles; join stakeholder engagement processes around country and sectoral strategies; engage during the civil society open days organized by the country offices; conduct research; and engage with CSOs coalitions working on development finance.

03

At a regional level, CSOs can participate during the policy reviews and annual meetings. The AfDB also organises CSO forums, separately from the annual meetings.

04

At the international level, CSOs can engage with governments and Executive Directors of the Board. For example, CSOs can also collaborate together at global level through engagement in the FICS.

03

African Development Bank



©CHRD -Civil society groups on the sidelines of the AfDB Annual Meetings



©AfDB Group Partnerships

Mandate and objectives

The African Development Bank (AfDB), formed in 1964, is one of the oldest and most established PDBs in Africa. Its overarching objective is to spur sustainable economic development and social progress in in Africa, thus contributing to poverty reduction. The African Development Bank Group is made up of three institutions: the African Development Bank, the African Development Fund and the Nigeria Trust Fund. Its shareholders consist of 54 African countries (regional member countries) and 27 non-African countries (non-regional member countries). The AfDB offers loans and assistance to government and private entities at similar interest rates to commercial banks, payable over a five-20-year period. The AfDB provides interest-free concessional loans and grants. The NTF also offers concessional funding, but only to projects and not countries.

AfDB Objectives

The AfDB has five key strategic priorities



To feed Africa



To integrate Africa



To light up and power Africa



To improve the quality of life for the people of Africa



To industrialise Africa

The Board of Governors is the highest decision-making body. Each member country appoints one Governor and one Alternate Governor for the Board, who serve a five-year term. Below this level is the Board of Directors which make key decisions. The Board of Directors comprises 20 members: 13 are elected by the governors of regional countries and seven by non-regional member countries. The President is elected by the Board of Governors for a five-year term and is in charge of the management of the bank, under the Board of Directors. The AfDB structure also includes an Audit Department, an Independent Evaluation Department and an Internal Administrative Tribunal.

The AfDB Member States exercise a voting power proportional to the amount of money they contribute to the AfDB. As of 2023, the regional country members with the highest voting power are Nigeria, Egypt, South Africa, Algeria and Morocco, while the non-regional members with the highest voting power are the United States (US), Japan, Germany, Canada and France⁵. Of these, Nigeria, the US and Egypt have the greatest voting power. These are key stakeholders that civil society can aim to influence. The AfDB has more than 34 country offices, two resource centres in Kenya and South Africa, and an external office in Japan. Its headquarters are in Abidjan, Côte d'Ivoire. Country contact details can be found [here](#).

Frameworks for civil society engagement

AfDB Timelines⁶

1964

AfDB was formed

1999

Initial CSO framework developed

2000

CSO Forum established

2000

CSO Committee established

2011

CSO forum begins annual meetings through to 2020

2012

Framework for Enhanced Engagement with CSOs developed

2013

Revised access to information policy comes into effect

2016

CSOs submit a collective statement to the Bank ahead of its annual meetings (greater engagement and review of CSO forum)

2018

CSOs submit a collective statement to the Bank ahead of its annual meetings (greater consultation on projects and consultation on key Bank policies)

2018

CSO committee revitalised

2019

First CSO committee statutory meeting

2019

Bank conducts an evaluation of the safeguards review (minimal consultation)

2022

Access to Information review conducted by the Bank (minimal consultation)

2023

New terms of reference for CSO Committee developed

2023

CSOs submit a collective statement to the Bank ahead of its annual meetings (the inability to participate in annual meetings)

2023

AfDB updates the safeguards policy

2024

CSOs submit a collective statement to the Bank ahead of its annual meetings (suggestions to develop institutional arrangements to strengthen participation at annual meetings)

AfDB-CSO engagement framework

The first engagement between the AfDB and civil society began in the early 1990s, where the Bank held a consultative meeting with non-governmental organisations in Abidjan, Côte d'Ivoire.⁷ This resulted in an initial framework for engagement that was produced in 1999. In 2012, the AfDB developed the Framework for Enhanced Engagement with CSOs.⁸ This framework structured CSO engagement through outreach, dialogue, and partnership at the corporate, regional/country and project levels and differed from the past framework by mainstreaming (rather than strengthening) civil society engagement with the Bank's operational work.⁹ The AfDB has proposed several ways to mainstream civil society engagement at the Bank, which includes strengthening institutional capacity, engaging with civil society on specific Bank policies and operations, building capacity on civil society engagement and communication and outreach. There is also an upcoming Civil Society Engagement Action Plan 2024-2026. The next sections examine the practicalities of CSO engagement with the Bank across different institutional structures and in terms of Bank policies and strategies.

Institutional capacity for engaging civil society

- **AfDB focal points**

The AfDB has taken measures to strengthen its institutional capacity for engaging with CSOs, which involves appointing dedicated staff. The AfDB has established a Gender, Women and Civil Society Department, with a Civil Society and Community Engagement Division and Social Innovation Division dedicated to civil society engagement.

- **Annual meetings**

Civil society has repeatedly called for CSO participation in the Bank's official annual meetings. In 2016, 48 African CSOs sent a letter to the president of the AfDB calling for more space for civil society engagement and a reform of the CSO Forum.¹¹ The groups issued recommendations to incorporate greater CSO autonomy, visibility, and participation.

In 2018, CSOs issued a collective statement urging the Bank to put people at the centre of industrialisation by investing in African-owned business and local small and medium enterprises that are driving sustainable development in their communities.¹² The groups called on the Bank to improve civil society and community participation in the selection, design and implementation of projects, and highlighted the need for broader consultations on key Bank policies such as the gender strategy, the social and environmental safeguards system, and the accountability mechanism.

This was further emphasised in a letter signed by 46 African organisations, who were concerned that communities directly affected by AfDB-funded activities, as well as CSOs, would not be able to participate in its 58th Annual Meeting in 2023. They expressed concern that the Bank had decided to hold its annual meeting in Egypt, where civic space is closed.¹³ The organisations also raised issues on the AfDB's policy review processes, which they claimed lacked transparency and provided limited space for civil society participation.

In February 2024, ahead of the 2024 Annual meetings, civil society wrote a letter to the Bank demanding meaningful participation, including thematic CSO-led sessions, a CSO roundtable discussion with AfDB Executive Directors and a CSO town hall meeting with AfDB Senior Management.¹⁴ Another submission suggested that the Bank create a Civil Society Policy Forum (CSPF), similar to the one that the World Bank uses in its Spring and Annual Meetings, or the civil society programme in sessions of the Asian Development Bank.¹⁵ These suggestions were not implemented. Civil society groups flew to Nairobi to attend the 2024 meetings, but about 15 civil society representatives who are part of the Civil Society Working Group on the AfDB, faced security threats and were not allowed to attend.¹⁶ In June 2024, CSOs issued key recommendations to the Bank, including ensuring their representation at annual meetings.¹⁷

- **The AfDB-CSO Forum**

The Bank-CSO Civil Society Forum was initially established in 2000, and meetings were held in 2011, and then yearly.¹⁸ However, civil society has criticised the Bank for organising separate continental and regional CSO forums, noting that ‘the nature of these forums often resembles partnership meetings rather than platforms for meaningful and critical dialogue with the Bank’s decision-makers’.¹⁹

The 2020 AfDB Civil Society Forum was focussed on improving the nature of civil society engagement with the Bank. Some of the recommendations included:²⁰

- Improving policies and channelling resources to make projects more accessible and inclusive for marginalised groups. There should be greater investment in youth and education. Collaboration with CSOs on gender issues can be strengthened as communities have access to some of the most marginalised women. It should also focus on primary healthcare to reduce inequalities.
- Improving stakeholder engagement. This includes publishing documents and conducting consultations in local languages. The AfDB currently only produces publications and conducts consultations in English and French.
- Make the Independent Review Mechanism (IRM) accessible. The IRM is currently undergoing review. CSOs emphasised the need for the AfDB to publicise more about the existence of the IRM, its application to projects, and how CSOs can participate in the review process. Drawing on the structure at the World Bank, CSOs advocated that communities should be able to participate in submitting grievances and contributing to management action plans.
- Increase openness to CSO involvement by creating opportunities for dialogue about host project design and implementation. CSOs also urged the institution to update their CSO database so that more organisations receive updates and information to engage with the AfDB.

Most recently the AfDB-CSO Forum focussed on climate change, and the 2022 CSO Forum’s theme was ‘Engaging Civil Society for Climate Resilience and Just Energy Transition in Africa’. In 2021, five regional civil society forums were held in lieu of the continental annual forum, in which climate finance, energy transition and climate resilience were identified as key topics for further discussion in 2022.²¹ The reports are published on the AfDB website.²² Despite efforts to engage civil society on climate change issues, some stakeholders have criticised the Bank for investing in fossil-fuels and cancelling an African civil society-led COP26 event in 2021, noting that civil society engagement remains a box-ticking exercise.²³

- **AfDB CSO Committee**

The CSO Committee was first established in 2000, and terms of reference developed in 2015. This was followed by a consultative process in 2016, and a new Committee was appointed in 2018. It held its first statutory meeting in 2019. The term of the Committee is for a period of two years. In 2023, new terms of reference were developed.²⁴ These terms of reference noted that the Committee was an important partner for engaging with communities on AfDB operations, but that it lacked influence in strategic decisions, and in terms of accountability and representativity.

Furthermore, an evaluation of the Committee found that the Committee was very important in terms of mobilising grass roots organisations.²⁵ It has supported major events, such as the 2021 CSO Regional Forums and 2022 Continental Forum and was instrumental in showcasing the impact of Bank operations. The Committee has also provided input policies such as country partnership strategies. However, its influence in strategic decisions had been weak, and there had been an absence of monitoring tools. It also lacked capacity to reach the whole region, and there was a weak link between the committee and its constituents.²⁶

The new terms of reference stipulate that the Committee should have 11 CSO members – made up of five Regional and five thematic CSO Representatives and one international NGO. Instead of having a fixed number of Bank members, it was decided that relevant AfDB departments would be invited to collaborate on strategic, thematic and project-based activities.²⁷ The current list of CSO representatives is detailed on the AfDB's website.²⁸ The terms of reference stipulate that the AfDB representatives would have the following roles:

- The Vice-Presidency of the Bank, in charge of the Agriculture, Human and Social Development Complex chairs the Committee to demonstrate the Bank's commitment at highest level to civil society engagement.
- The Department of Gender, Women and Civil Society is accountable for the achievements of the Committee in relation to the Bank's engagement with civil society.
- The Civil Society and Community Engagement Division is the secretariat of the Committee and owns and manages the civil society engagement process.
- Three to five members from other Bank Departments shall be considered based on expectations regarding civil society engagement. Departments working on themes such as Climate Change, Resilience/Fragility, Governance, and Capacity Development shall also be co-opted depending on the cross-cutting nature of themes of Bank events such as COP and CSO forums.

The Committee meets twice a year, or more if deemed necessary. The Committee monitors the implementation of the CSO engagement strategy, based on a result-framework and serves as the interlocutor between the Bank and the broader CSO community.



- **AfDB working group**

There is also an AfDB working group, led by the Coalition for Human Rights in Development.²⁹ Some of the CSO Committee members have been invited to give presentations to the working group and have suggested that engagement with the Bank to date has been difficult. Members of the working group, namely the Accountability Counsel, Arab Watch Coalition (AWC), Bank Information Center (BIC), Both ENDS, Center for International Environmental Law (CIEL), International Accountability Project (IAP), and Lumière Synergie pour le Développement (LSD), have developed a toolkit for understanding the AfDB, which can be found [here](#).³⁰

- **Communication and outreach**

CSOs need to be kept abreast of Bank-funded activities while the Bank needs to have basic and credible information about the CSO landscape on the continent. To mainstream CSO engagement, it is important to strengthen internal communication in the Bank, while also enhancing external communication. A CSO platform is a way to enhance communication. The AfDB now has a dedicated page of press releases relating to its civil society engagement, which is helpful for understanding the different types of engagement.³¹ There is also a CSO database, where CSOs can register online: <https://cse.afdb.org/en/links/csos-database>. CSOs now also contribute to a newsletter, which highlights some of the work of CSOs engaging on AfDB priorities.



©CHRD -Civil society at the AfDB Annual Meetings. May 2024, Nairobi.



©AfDB Group Partnerships

Engaging with civil society on specific Bank policies and operations

Overarching and country strategies

The Bank relies on ten-year strategies, which CSOs could engage with while under development, but the primary point of entry is through Country Strategy Papers (CSP). CSOs can also engage on specific projects or on open days. While engagement on country strategies has been limited in the past, this appears to be improving. For example, civil society was engaged in the development of a country strategy in Burkina Faso in 2023³² and in Lesotho in 2024.³³ In Ghana, the AfDB engaged with CSOs to solidify their relationship at a regional level. An agreement was signed between the Bank and the West Africa Civil Society Institute in December 2023 resulting in an action plan for 2024 that outlined collaboration in CSO capacity building, resource mobilisation, knowledge management, and advocacy. There were also discussions of collaboration with Afrobarometer in the budget space. The mission also met the West African Network for Peacebuilding (WANEP) culminated in finalising a joint Transition Support Facility III proposal titled 'Sahel Peacebuilding, Reconciliation, Inclusive Development and Empowerment'.³⁴

The Disclosure and Access to Information Policy (DAI)

The AfDB Disclosure and Access to Information Policy was first drafted in 2005. It was then revised and came into effect in 2013. The policy differs from the 2005 policy by requiring the Bank to disclose anything that is not on the list of exceptions.³⁵ The DAI policy is found on the AfDB website [here](#). During this review, civil society raised concerns about the AfDB's lack of transparency about engaging with a broader stakeholder group.³⁶ This policy mandates the Bank to make all information public, unless it is on a list of exceptions if there is a compelling reason for confidentiality.³⁷ Key strategic documents are made available on the website, but civil society can also make requests for information through the DAI Request form (<https://www.afdb.org/en/disclosure-and-access-to-information/request-for-documents>). If the request is denied, civil society can appeal through the Information Disclosure Committee or through the appeals panel.

However, the International Accountability Project tracked project information disclosed for 179 projects in 2019. It found that in practice, the Bank fell short of fulfilling communities right to information in several areas, including the level of disclosure for information on project-specific environmental and social risks and mitigation and disclosure of information on the applicable environmental and social safeguards that have been triggered by the project. They found that lead contact information for the borrower or client was not disclosed for 161 of 179 projects (90 per cent), that there were no translations in Arabic, Kiswahili, Portuguese, or other local languages, that only two out of the 179 projects (1 per cent) disclosed the actual plans for stakeholder engagement and that only five of the 179 projects (3 per cent) disclosed information about the Independent Review Mechanism, the AfDB's independent accountability mechanism, in project documents.³⁸

The Access to Information Policy was reviewed in 2022 (but not updated), analysing the period 2012-2021.³⁹ The review was generally positive, with very few suggestions for improvements and finding the Policy to be in line with Access to Information Policies of other PDBs. It noted ways to bolster engagement with CSOs and concerned communities, urging revision of the separate but related External Communications Strategy and Policy. The review recommended that an external independent appeals mechanism be created to handle appeals of request denials, since only four appeals had been filed since 2013. In 2020, 453 requests were made and only two were rejected.⁴⁰ The delay in establishing an appeals panel was attributed to a lack of resources. It also recommended an independent evaluation of the policy. Some thorny issues included the DAI requirement to simultaneously disclose certain operations documents when they are circulated to the Board for approval, difficulty in finding documents, and strengthening staff capacity. It also states that the policy needs greater internal and external visibility and that a communications policy should be developed. The number of documents proactively disclosed on the Bank's website has increased significantly over the years, from 700 in 2013 to 3 795 in 2020.⁴¹

AfDB Disclosure and Access to Information Policy

The DAI policy is found on the AfDB website [here](#).

The Integrated Safeguards System (ISS)

In 2019, a review of the safeguards system found that it was on par with international best standards, but that certain components could be strengthened, such as gender. The study notes a review of the 2016 AfDB Involuntary Resettlement Policy and notes discrepancies between country systems and the Bank's policies in terms of: (i) stakeholder engagement (information disclosure, CSO involvement); (ii) the identification and involvement of vulnerable groups; (iii) cut-off dates, compensation and entitlement frameworks; (iv) gender mainstreaming; (v) institutional and organisational framework; (vi) grievance mechanisms; (vii) environmental management at the resettlement site; and (viii) Monitoring and Evaluation (M&E).⁴²

The Policy was then updated in 2023, following this review. The new policy looked to address gaps in past AfDB strategies, including community health and safety, gender-based violence, Indigenous Peoples, inclusion of marginalised groups, and stakeholder engagement.⁴³ It considered sectoral bank policies, such as on forestry, agriculture, water and health. However, civil society made a submission to the Bank in 2022, arguing that the process had not been as open as it would like.⁴⁴ In particular, the letter noted that:

Civil society letter

CSOs are concerned that by the time external input is sought, decisions will have already been made on both the structure and the content of the policies, making any consultations merely a tick-box exercise rather than a genuine opportunity to influence the policies.

It also noted that the consultations fell short of the consultations arranged by peer institutions.

While the new ISS policy included language on reprisals (ensuring that people could speak out safely about some projects), civil society has urged the Bank to emphasise the importance of civil society engagement with its clients and to promote community-led development and human rights-based approaches. It has also called on the Bank to strengthen transparency and accountability, and to take steps to assess, prevent and respond to reprisals.⁴⁵ In particular, the submission made recommendations on the implementation and common approach of borrower frameworks, urging the Bank to develop a specific monitoring role and to strengthen its capacity to implement the ISS, to make differentiations on gender, to take an integrated, systematic, and consistent approach to the inclusion of marginalised groups, including persons with disabilities and children and to uphold the international standards and definitions on climate change. It also urged the Bank to align the ISS with the IRM Framework and ensure that well-functioning grievance mechanisms are made available for workers.

The advocacy on this review included (note that these are only stated, and not accessible) on the Coalition’s website:⁴⁶

- A joint submission on the ISS review (mentioned above).
- A joint submission, submitted by over 30 CSOs, on the commitments against reprisals.
- International Accountability Project – submission with a focus on stakeholder engagement.
- Indian Law Resource Center – submission with a focus on Indigenous Peoples’ rights.
- Accountability Counsel – submission with a focus on accountability and remedy.
- Friends of the Earth – submission with a focus on biodiversity.
- Both Ends – submission on the ISS review.
- Bank Information Centre – submission on the ISS review.



©AfDB - Civil society at the AfDB Annual Meetings. May 2024, Nairobi.

Gender

The AfDB has developed a Gender Strategy for 2021-2025. It also has a Gender Policy dated 2001. In an analysis of gender policies across 12 PDBs, Gender Action rated the AfDB third in terms of having strong policies. The policies were considered strong in terms of priorities and mechanisms and adequate in terms of goals and mandate. Thematically, the AfDB gender approach was strong in terms of unpaid care work but was adequate in terms of gender, environment and biodiversity, staffing and M&E. It fell short on gender and climate change; sexual and gender minorities; Sexual and Gender-Based Violence (SGBV); and Sexual Exploitation, Abuse and Harassment (SEAH) and staffing.⁴⁷

Gender Action also analysed the AfDB’s draft updated ESF for this report and submitted written feedback to the draft ESF during the AfDB consultations in 2022, but at the time of writing their report, the AfDB had not yet replied to the submissions. The analysis found the AfDB ISS policy to be adequate for gender in terms of its mandate, reference to discrimination and human rights, information disclosure and resettlement. It was weak on the gender references to environmental and social risks, debt, climate change, environment and biodiversity, and consultations and consent.⁴⁸



Independent Recourse Mechanism (IRM)

The AfDB has an Independent Recourse Mechanism where CSOs can engage the Bank in understanding the nature and scope of complaints for Bank-financed projects. It can carry out mediation, investigation and advisory services (internal learning). Complaints can be submitted in any format, and should contain contact information, a signed letter, a brief description of the project, an outline of the expected change as a result of the complaint process and a description of how the complainant has engaged with the Bank in good faith. Complaints can be sent to the IRM at the AfDB headquarters, or through any of the country offices. Details on how to file a complaint can be found [here](#).

In the submission to the safeguards review, civil society urged the Bank to clarify its functions and to strengthen information disclosure and enable remedy in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs).⁴⁹ On the project-level grievance mechanisms, it demanded that this shouldn't remain the sole responsibility of the borrower. It urged that the mechanism should be disclosed to local communities prior to project appraisal, ensure the legal and physical safety of those facing retaliation, and ensuring that the project-level grievance mechanism is managed by independent personnel with no ties to the project to be more independent. It also noted that the ISS should explicitly require the Borrower to provide multiple accessible means for stakeholders to access and use this mechanism (namely, email address, phone number and SMS) and stressed that all communities should always, at all times, have direct access to an overarching grievance mechanism, no matter what local mechanisms are available.⁵⁰ Promisingly, the IRM intends to appoint trusted advisors who can work with communities, while engaging donors to provide grants for these organisations.⁵¹ The IRM has also developed an anti-retaliation toolkit, which involved extensive consultation with CSOs and academics, and can serve as a guide for other PDBs.⁵²

There are a number of positive examples of engagement with the IRM. For example, on 21 December 2023, a historic agreement was signed between Malicounda Power SAS and representatives of project-affected people, which extended support to community members who had lost their livelihoods as a result of physical or economic displacement caused by the construction of a power plant.

The complaint had been submitted by the Senegalese NGO, Lumière Synergie pour le Développement (LSD), and a coalition of households, highlighting concerns of non-compliance in terms of the AfDB's environmental and social safeguard policy on land compensation and raising issues on the implementation of the resettlement action plan of the Malicounda 120 MW Dual Fuel Project. After a year-long mediation process, communities were granted compensation.⁵³

On 28 March 2024, the IRM released two reports that found the Bank was not compliant with its own safeguards system in Uganda. The reports found that the Bank had not conducted meaningful consultations, had not ensured consent, had not adequately examined the socio-economic impacts on communities, and had not acted sufficiently to address reprisals. In the one case, the 'Multinational Lakes Edward and Albert Integrated Fisheries and Water Resources Management (LEAF) Project', the Fisheries Protection Unit of the Uganda Peoples' Defence Force had destroyed boats, fishing equipment and houses, under the pretext of cracking down on illegal fishing. There were also reports of gender-based violence. The Wadelai Irrigation Scheme, on the other hand, resulted in restricted access to community lands and the loss of community livelihoods. A management plan will now be developed to put the recommendations into action.⁵⁴ However, in the LEAF case, the onus of responsibility for investigating human rights complaints has been transferred to the Ugandan Human Rights Commission, who may be biased. In the Wadelai case, management used a divide and conquer strategy to engage representatives outside of those who had submitted the complaint, and the government's mediation efforts were found not to be credible. In these cases, the effectiveness of the IAM is dependent on the response from management and may be limited by their ability to compel action or to provide remedy.⁵⁵ They also illustrate how the AfDB is able to put the onus of responsibility onto the borrower, including remedial action, and the limitations of working in authoritarian contexts.



PDB Engagement Toolkit

For full details of these case studies, [visit the Toolkit](#).

Fragile States Unit

Unique to the AfDB, is the Fragile States Unit, a standalone operationally autonomous entity that was a special initiative of the Board of Directors at the AfDB and the ADF.⁵⁶ Established in 2008, the AfDB was one of the first PDBs, alongside the International Finance Corporation (IFC) to recognise that development was interlinked with peace and needed specific attention.⁵⁷ CSOs can also engage with the AfDB's Fragile States unit to promote human rights, stabilise conflict situations and provide services to support the Bank's work in conflict prevention, reconstruction and reconciliation. The AfDB has affirmed its commitments to the principles and values of human rights as set out in the United Nations Charter and the African Charter on Human and Peoples' Rights and this is therefore one way to hold the Bank accountable. While it hasn't yet signed up to specific climate commitments, this is a possible area to hold it accountable in the future.

It is noteworthy that its latest strategy, the Strategy for Addressing Fragility and Building Resilience in Africa (2022-2026), reinforces the role that civil society can play in the Bank's strategy while also expanding the range of CSOs that it works with. It aligns this to its Fragility Strategy, noting the specific role that civil society can play in building community resilience, as well as in reducing inequality and marginalisation.⁵⁸ It proposes dialogue with local communities, to identify and address grievances, as well as engagement with civil society on the 'do no harm' principle and on natural resource governance.

Evaluations of CSO engagement

In July 2022, an evaluation was conducted by the Bank's Independent Development Evaluation Mechanism (IDEV) of the Bank's civil society engagement between 2012-2019. The consultations that were held with CSOs to develop the evaluation were those who had engaged with the AfDB at Civil Society Annual meetings, in monitoring projects, ad hoc requests for feedback on project design and those that had implemented projects through grants organised by the AfDB. However, the Bank Information Centre notes that:

AfDB at Civil Society Annual meetings

None of the organisations had previously been invited to consultations on the Country Partnership Framework, the AfDB evaluations or policy reviews, or project completion documents. Very few of them had been engaged in project design, implementation, or monitoring around the AfDB funded projects.

The critique also notes that CSOs find it difficult to access project information or documents at home offices. They are referred to regional offices but receive no responses. The critique from CSOs requests better information disclosure, more accessible methods of communication, and more active engagement of CSOs.⁵⁹

Even so, the evaluation found that while the existing documents were well-defined, they were not well-known or understood by the Bank's staff and civil society.⁶⁰ The lack of an M&E framework also hampered learning and knowledge management on CSO experiences. There was inadequate staffing and funding to support the implementation of the 2012 CSE framework but the Bank's institutional positioning has improved since 2012. There has been progress in access to information and public disclosure (such as through project portals, a CSO database and a civil society tab on the Bank's website), but there is no sustained and systematic two-way engagement between the Bank and civil society. Moreover, access to information can be dependent on capacity, resources and the level of freedom of expression in a given country. In the review, task managers noted time constraints, competence and the common perception that CSOs are 'troublemakers', meaning that information is not actively disclosed by the Bank.⁶¹



©AfDB Annual meeting



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CSO open days have been helpful for outreach, but geographical coverage has varied, and outreach is dependent on staff and their awareness of the value of civil society engagement. There has been a lack of data and reporting on outreach. The CSO Forum is the best example of dialogue, but the link between the forum and Committee is weak. The spectrum of CSOs was also not representative. At a regional and country level, the AfDB lacks tools, guidelines and resources for engagement with CSOs, although guidelines are being developed for CSO engagement in the Country Strategy Partnership process. The Bank can develop better criteria for identifying and partnering with CSOs.

The following recommendations were made: 1) Enhance awareness and a common understanding of the purpose and potential value-added of CSE (communicate guiding documents, tools, M&E framework, and integrate CSO output into Bank framework); 2) Enhance the resourcing approach for effective implementation of CSE (develop operational guidelines, explore alternative funding sources, and adequate staffing at the bank); and 3) Strengthen CSE in policy dialogue at the country and regional levels (develop guidance for CSO engagement in policy dialogue, set up institutional arrangements, and systematise open days at CSO level).⁶²

The evaluation proposed a strategy, comprised of three main pillars: 1) Creating an enabling environment for civil society. This includes strengthening institutional capacity; 2) Mainstreaming civil society engagement through the Bank's policies and operations and projects; and 3) Enhancing advocacy on civil society engagement.⁶³ It was suggested that the strategy for civil society engagement from 2023-2028 encompass a strategic document, action plan, a CSO financing mechanism, an M&E tracking system and a communication plan. It is not clear if these have been developed.



© Lumière Synergie pour le Développement - NGO supporting communities impacted by the activities of development banks

Recommendations to CSOs to strengthen their AfDB engagement

- Continue to advocate for a CSO panel at annual meetings.
- Identify upcoming Country Strategies for review and advocate for CSO engagement in these strategies.
- Advocate for regular meetings between the CSO Committee and Bank officials, as well as regular meetings between the AfDB working group and Bank officials, that allow for two-way sustained and systematic engagement on policy dialogue.
- Strengthen the AfDB CSO database by proactively engaging the AfDB's CSO department and providing contact details of various organisations.
- Engage the AfDB to highlight challenges of access to information in practice on the basis of evidence.
- Engage with Bank management to advocate for limitations of the list of exceptions in the Access to Information Policy.
- Emphasise the need for a stronger monitoring role by the Bank in its DAI and ISS policies.
- Propose that the AfDB develop concrete measures to tackle reprisals.
- Engage the Bank to develop language to better include the perspectives of marginalised groups.
- Stress the importance of the Bank developing measures for remedy and for taking responsibility for remedy in addition to the responsibility of the client.
- Enhance AfDB awareness and a common understanding of the purpose and potential value-added of CSE (such as through guiding documents, tools, and an M&E framework).
- Advocate for the AfDB to enhance its resourcing approach for greater CSO engagement.

04

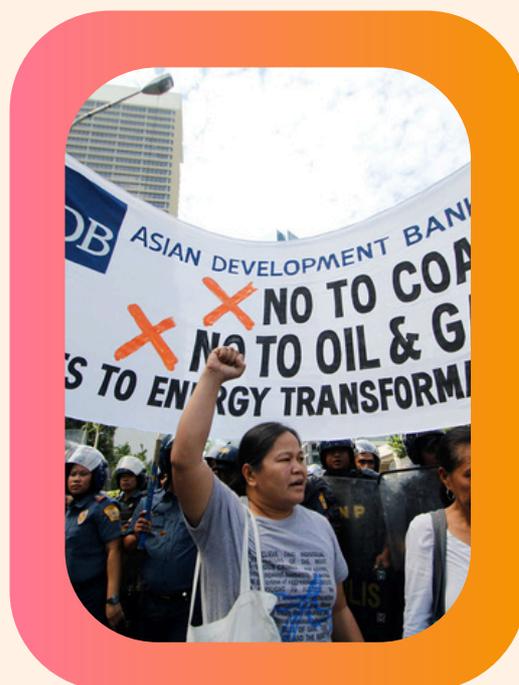
Asia



Development Bank



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Mandate and objectives

The Asia Development Bank (ADB) was formed in 1966. Its mission is to build a prosperous, inclusive, resilient, and sustainable Asia and the Pacific, while sustaining its efforts to eradicate extreme poverty in the region.⁶⁴ Its Strategy 2030 was developed in 2018. In 2024, it began a mid-term review of its strategy. In 2021, the ADB developed an approach to working in Fragile and Conflict-Affected Situations (FCAS) and Small Island Developing States (SIDS) – the first time a PDB has combined these two focus areas into one strategy.⁶⁵

Like the AfDB, it has a Board of Governors, made up of its member countries, which delegate most of their authority to the Board of Executive Directors. As of 31 December 2022, ADB's shareholders consisted of 68 members, 49 from Asia and the Pacific region, and 19 from outside the region. The biggest non-borrowing shareholders are Japan, the United States, Australia, Canada and the Republic of Korea. The biggest borrowing countries are China, India, Indonesia, Malaysia and the Philippines.⁶⁶ The ADB has Special Funds, Trust Funds, Financing Partnership Facilities and other funds.⁶⁷ The ADB currently has operations in 44 countries, six other offices and five regional programmes. Its headquarters are in Manila, Philippines. The details of these can be found here.⁶⁸

Frameworks for civil society engagement

ADB Timeline⁶⁹

1966

ADB was formed

1991

NGO FORUM established

1994

First Regional NGO consultation

1997

NGO FORUM re-organised and begins engaging the ADB

1998

NGO Cooperation Policy was established

1999

NGO FORUM started critiquing the ADB on energy policy

2001

NGOC established

2001

NGO FORUM boycotted the ADB annual meeting

2004

First CSO panel session at the ADB Annual Meeting

2008

ADB Safeguards Mechanism introduced

2008

NGO Forum challenges the Bank's Accountability Mechanism

2009

ADB approved Energy Policy

2011

Public Communication Policy (PCP) review

2012

Review of Accountability Mechanism

2015

NGO FORUM starts monitoring and engaging ADB

2016

Public Communication Policy (PCP) review starts

2017

Civil society challenges ADB's immunity

2017

NGO FORUM two-day meeting 'A Visual Testimony of ADB's 50 years of destruction'

2018

Strategy 2030 developed

2018

NGO FORUM launched 'Decarbonise the ADB and AIIB' campaign

2018

CSO submission on the PCP

2018

PCP (now access to information) Policy adopted

2020

NGO FORUM starts the South-South Integrated Energy Planning Campaign

2020

NGO FORUM sends a letter of introduction to the new President

2021

ADB announced it will stop funding coal under its new Energy Policy

2024

Strategy 2030 mid-term review

2024

NGO FORUM demands an overhaul of safeguards. Reality of Aid challenges ADB on development effectiveness principles

ADB-CSO engagement framework

The main strategy guiding the long-term work of the ADB is Strategy 2030. Paragraph 108 speaks to strengthening collaboration with CSOs, by tapping into their local presence and specialised knowledge. Specifically, it states that it will explore opportunities to engage with civil society on the design and implementation of AfDB projects, with a particular focus on 'operations that use grassroots participatory approaches to target the poor and vulnerable groups, mobilize women and young people, and monitor project activities and outputs'. It states that the ADB will also ask for inputs on the review of major ADB policies.⁷⁰ It also has sectoral guides along the following thematic lines: education, energy, finance, health, transport, urban, and water. The ADB has Country Partnership Strategies and a regional partnership strategy.

Beyond this, the ADB has a specific policy on NGO engagement (1998), that updated the existing policy paper from 1987, to incorporate its growing focus to not only support growth-oriented projects, but also human development, social development and environmental protection. Unlike the 1987 paper, the new policy distinguishes between engaging in commercial and contractual relationships with NGOs through procurement policies, while operational relationships would be related to the ADB's processes for project, programme and policy development.⁷¹

The paper notes:

It is necessary that ADB develop mechanisms that recognize and support a range of NGO relationships. ADB's policy and approaches to cooperation with NGOs must recognize the diversity of the NGO sector, and the fact that a single view of NGOs or a single approach to NGO cooperation will not be adequate. Mechanisms for cooperation with NGOs will vary according to the type of NGO, the issue or interest in question, the specific kind of cooperation being considered, and the specific circumstances that exist in each case. Cooperation with NGOs will be affected especially by country-specific circumstances. Cooperation with NGOs in ADB's operational activities would proceed as a part of or in parallel with other operational considerations, including the emerging process approach orientation of ADB's operations. In any case, NGO input into ADB operations would have to be considered carefully, as would input from any other source.

It then further stresses the sovereignty of governments, noting that it is important to 'identify NGOs with which cooperation would not be mutually constructive'.⁷² Thus, from the outset, the ADB is limiting the types of CSOs with whom it wants to engage. It should also be noted that the ADB does not finance NGO-proposed projects directly. The ADB lends money to its member country governments, which means that NGOs seeking funding must liaise with country offices. Their involvement in ADB operations would therefore be limited to the openness of a government to engage.

The ADB does not have a specific fund for NGOs, but CSOs are involved in the project design phase and through consultations. However, NGOs can bid for contracts and are treated the same as firms. The ADB has now developed a primer document that NGOs can use to identify business opportunities for NGOs. It notes that NGOs can reach out to the ADB in four main ways: through the NGO Anchor, during Country Partnership Strategy preparations, at the ADB Business Opportunity Fairs, and when ADB policies and strategies are under review.

The ADB has also developed a multi-year technical assistance programme to strengthen CSO engagement and found that this could include: (i) increasing access to and the responsiveness of health, education, and social protection services; (ii) accessing and leveraging the effects of infrastructure investments; (iii) improving public sector governance and reducing corruption; (iv) helping implement sustainable natural resource management; and (v) improving economic inclusivity through interventions that target poverty.



©NGO Forum on ADB - public action

Institutional capacity for engaging civil society

- **ADB Focal Point**

The NGO policy identifies the Office of Environment and Social Development as the main focal point for engagement with NGOs, with the mandate of maintaining a CSO database, organising formal consultations and coordinating the development of operational guidelines for an expanded programme of cooperation. It also states that the Programmes Departments should engage with NGOs on country programming and consult with the Projects Departments on specific activities. The Office of the General Counsel is responsible for dealing with NGOs in the context of legal frameworks. In addition, the Office of Pacific Operations deals with project and programming activities related to NGOs. The Central Operations Services Office is responsible for NGOs that are engaged as consultants, while the Office of External Relations handles NGOs requests for information. Finally, the Operations Evaluation Office can assess the efficiency of ADB-NGO cooperation.

In 2001, the NGO policy was expanded further with the establishment of the NGO Network and NGO Centre, which was later renamed the NGO and Civil Society Centre. ADB also established strategic partnerships with civil society. There is also the CSO Cooperation Network, which comprises about 30 operational staff called CSO anchors. They are focal points for CSO engagement in each of the operational departments, civil society specialists in the resident missions and representative offices, and other ADB departments.

- **Annual meetings**

A brochure on 'Civil Society Participation at the Annual Meeting of the Board of Governors of the Asian Development Bank' lauds the involvement of civil society at ADB meetings, emphasising that:

ADB Civil Society Participation at the Annual Meeting

As of 2015, there are more than 850 CSOs and NGOs accredited to attend the Annual Meeting, coming from more than 30 member countries. The highest number of CSO participation took place in Manila, in 2012, with 395 CSO representatives in attendance.⁷³

However, CSOs are expected to pay for their own travel and expenses. It is not quite clear when this engagement started.



STOP AIR POLLUTION
CLEAN AIR : CLEAN FUTURE

©Sanjog Manandhar/Forus - youth activists in Nepal

Engagement

The CSO programme is divided into three parts

01

Meeting with Members of ADB Senior Management. This provides an opportunity for CSOs to ask questions to Senior Management, traditionally represented by the ADB President, about ADB policies and operations.

02

Civil Society Panel Discussions. These are co-organised with CSOs and cover discussions on development or specific operational topics relevant to ADB operations.

03

Learning with Partners. Here, CSOs, private sector, and ADB staff share innovative solutions, insights, and experiences on key development themes, showcasing CSOs contributions to development. The NGOC also organises youth events.⁷⁴

The first regional consultation with civil society took place in 1994. The NGO FORUM has been particularly active on challenging the ADB on the outskirts of annual meetings, namely boycotting the annual meeting in 2001, and then participating in the first ever panel session at the Annual Meetings in 2004. From then, civil society has participated at the annual meetings both as panellists and protestors. Engagement at the Annual Forums remains limited in that questions to management are fielded and that CSO representation is largely regional, rather than including more local communities and CSOs, often because of the costs involved in attending.

In 2024, CSOs from inside and outside the halls of the ADB's annual meeting called on the Bank to respond to calls of worsening and shrinking civil space and calling it a threat to development.⁷⁵ The timing was opportune, given the Bank's mid-term review of its strategy, with the Access to Information policy recently reviewed and the Safeguards Policy still under review. The Bank stated that it is 'monitoring' the situation but cannot comment on it as it is a 'political matter'. Civil society, however, argues that repressive laws in client countries negatively affect its operations and commitment to meaningful engagement. It further asserted that this results in risk to communities and the environment. While CSOs had been calling for the highest standards of safeguards in projects, a coalition of nearly 60 organisations chose the forum to call for a complete overhaul and immediate redrafting of the Environmental and Social Framework (ESF).⁷⁶ CSOs also noted that the ADB's Accountability Mechanism (AM), which is currently being reviewed, will fail because closing civic space will allow for more cases of reprisals for those who speak out.⁷⁷

The Coalition for Human Rights in Development led a campaign called 'This is the Development that We Want' asking communities and CSOs to explain what they thought development looked like, namely development that is 'inclusive, sustainable and decolonized'.⁷⁸ Protests included reducing Bank support for fossil fuels, respect for Indigenous peoples and justice and accountability for communities.⁷⁹

In an X post, the NGO Forum on ADB said



NGO Forum on ADB | #nofalsesolutions 🙌🏻👍
@forum_adb

"This isn't just a gesture; it's a roar of defiance against institutional complacency. We refuse to sit idly by while the ADB trades environmental integrity and human rights for profit. Today, we bear the voices of the marginalized and the echoes of our planet's cries. Our message is clear: until justice is served, our activism knows no rest."⁸⁰

At the same time, the Reality of Aid-Asia Pacific (RoA-AP) submitted a collective CSO statement to the 2024 meeting, stating that the Bank has yet to demonstrate the effective development cooperation principles of democratic country ownership, focus on results, inclusive partnerships, transparency and mutual accountability. This is aligned to the Development Effectiveness Review, which is an annual report by the ADB Management to assess the Bank's progress in implementing Strategy 2030. They demanded more inclusive, transparent, and accountable mechanisms from the Bank to ensure the protection of peoples' rights, defence of the environment, and an enabling environment for civil society.⁸¹ The statement notes that 'CSOs, people's organisations, and social movements have highlighted how the bank's blueprint for recovery overlooks their historic role and their accountability in causing the multiple crises the region faces today'.



Statement

Specifically, the statement calls on the ADB to:

- End conditionalities, cancel debts, and abandon financing modalities that further impoverish developing countries and fragile states.
- End the corporate capture of development that discards the democratic rights of the marginalised and vulnerable and uphold rights-based and environmental principles and standards to ensure transformative, people-centred sustainable development.
- Genuinely address the climate crisis in its energy policy by halting all financing to fossil fuels and false solutions, decarbonising its portfolio, promoting universal energy access, scaling up funding to community-led sustainable renewable energy projects, and adhering to the development effectiveness principles.
- Address immediate humanitarian needs, contribute to addressing the root causes of conflict, and pursue long-lasting development and peace efforts with other development actors in fragile, conflict-affected contexts and small island developing states.
- Ensure the Safeguard Policy of the ADB is robust and responsive and ensure transparency and accountability of the Bank and its partners, based on a people-centred and rights-based framework, and with a principal role given to affected communities, sectors and civil society.

• ADB-CSO coalitions

The NGO FORUM (initially the NGO working group) was established in 1991 by 20 NGOs from 16 countries who thought that little attention was being given to the ADB compared to the World Bank and International Monetary Fund. It was reorganised in 1997 and established regional working groups representing Central Asia, Mekong Subregion, Pacific, South Asia, and Southeast Asia. In addition, separate working groups were also formed composed of NGOs from Europe, Japan, Australia, and the United States. The NGO Forum on ADB is governed by an International Committee whose members are elected by their respective regional working groups representing the following regions and countries: South Asia, Southeast Asia, Central Asia, Mekong Subregion, Pacific, Japan, The Netherlands, and Philippines. It has specific campaigns on safeguards, energy (within which it has an ADB project tracker), the ADB's Public Communications Policy, the Accountability Mechanism, and on Strategy 2030. Some of its campaigns include 'A Visual Testimony of ADB's 50 years of destruction' (2017), Decarbonise the ADB and AIIB (2018), South-South Integrated Energy Planning Campaign (2020) and an overhaul of the safeguards policy in 2024, as noted above. In 2021, the ADB announced that it would stop funding coal. A good summary of their engagements with the ADB is found in their letter of introduction to the new President of the Bank in 2020⁸² and in their video of 30 years of NGO Forum on ADB.⁸³ However, investigations by civil society reveal that the ADB continues to fund coal, such as in the case of Indonesia, where a US\$600 million loan to 'promote the use of clean energy' is supporting the country's national plan to build dozens of coal plants.⁸⁴

The Reality of Aid-Asia Pacific (RoA-AP) Observatorio is a CSO-initiated and maintained database of development projects funded through the Official Development Assistance (ODA) or funded by DFIs. As mentioned above, RoA-AP has engaged specifically with the ADB in terms of development effectiveness principles. It also has specific campaigns about ADB projects.

• Communication and outreach

The ADB has proactively communicated about its engagement with CSOs, but this is in terms of CSO involvement in ADB operations, and less in terms of meaningful engagement in policy. The NGO centre has facilitated knowledge creation from outside sources, but most of this is quantitative. There is less information on capturing the amount of ADB resources given to CSO involvement. A 2006 review of civil society engagement recommended documenting lessons and good practices for CSO engagement in processes, and operational guidelines to facilitate CSO engagement with operations. It also recommended allocating resources for civil society engagement in the design of projects.⁸⁵ Subsequently, the Bank has documented how civil society has engaged with each of the countries that make up its Member States in Civil Society briefs, while also producing blogs that have perspectives on civil society. It has established a Youth for Asia initiative. The NGO FORUM also produces critiques of the ADB's policies, and publications, in the form of briefers and guidebooks, tackling the Bank's operations in Asia and the Pacific. It also releases a quarterly magazine, Bankwatch.



Engaging with civil society on specific Bank policies and operations

Overarching and country strategies

The NGO FORUM is one civil society coalition that has actively engaged on the ADBs' Strategy 2030. One of the critiques of this strategy is that the ADB intends to shift to country safeguards systems without any assessment of equivalency of its own safeguards systems.⁸⁶

In terms of country strategies, the ADB notes that in 2023, CSOs in Cambodia, Georgia, the Lao People's Democratic Republic (Lao PDR), and Uzbekistan took part in consultation activities as part of the formulation of new country partnership strategies (CPS) that will guide ADB operations in those countries over five years.⁸⁷ In the 2022 report, it notes that civil society engaged in the CPS for Timor-Leste and in governance assessments along three thematic governance areas: public financial management, public procurement, and anticorruption. It claims this approach was pilot tested in the governance assessment for the Kyrgyz Republic and is now being rolled out in succeeding assessments and CPSs.

Access to information

The ADB's Access to Information Policy was previously called the Public Communications Policy from 2012-2018. Details on how to access information can be found [here](#). The review of the Access to Information Policy was carried out in 2016-2017. It went into effect in 2019. According to the ADB, the new policy has a new overarching principle of clear, timely and appropriate disclosure. This was designed to address past critiques such as the lack of any formal commitment to disclosure of information, no overall time limit for responding to requests, exclusions of whole categories of records from public access, limited grounds for disclosing information in the public interest and limited grounds to lodge appeals.⁸⁸

However, the review process was fraught with controversy, with the ADB proposing to replace a limited exception to protect good relations with States and inter-governmental organisations with a rule that gives all third parties a blanket veto over the release of information, no overall time limit for responding, exclusions and discretionary rules and limited grounds for appeals.⁸⁹

The NGO Forum has made multiple submissions to the ADB on its policy, with the last submission made in 2018,⁹⁰ which included commitments to translation, the appointment of a focal point for handling requests, removing exemptions, overrides and vetoes, an independent uncompromised appeals panel and stringent information disclosure requirements to disclose information on financial intermediaries including third parties and when using country safeguards system (CSS).⁹¹ The FORUM claims the Bank lacks the political will and the resources to implement the right to information.⁹² Details of policy implementation and disclosure requirements are provided in ADB's Operations Manual.⁹³

Environmental and Social Framework

The Safeguards Policy was originally called the 2009 Safeguards Policy and now the proposed Environmental and Social Framework (ESF). It is currently under review⁹⁴ and is heavily guided by the ADB Independent Evaluation Department's 2020 review of the effectiveness of the Safeguard Policy Statement. It is worth noting that this is a comprehensive framework for the ADB's safeguard provisions across three areas: environment, involuntary resettlement, and Indigenous peoples. While the ADB believes that the application of country safeguards systems to development projects reduces transaction costs, enhances country ownership and helps ensure long-term sustainability of development efforts, it is worth noting that it states that: 'Use of country safeguards systems is neither automatic nor mandatory. Country safeguards systems cannot be used on projects that ADB considers highly complex or sensitive'.⁹⁵

To prepare for this review, the ADB undertook 18 analytical studies and held extensive consultations with developing member countries. Some of the more innovative suggestions from the consultations included the integration of climate change, moving to integrate requirements for free, prior and informed consent of Indigenous peoples, and a proposal to include a dedicated standard on stakeholder engagement, information disclosure, and grievance redress mechanisms, among others.⁹⁶ The Office of the United Nations High Commissioner for Human Rights (OHCHR) primarily argued for a better alignment of the policy with international human rights law and advocated for human rights due diligence to be an explicit requirement of the revised safeguards.⁹⁷

At the 2024 Annual meetings, civil society drafted a collective statement demanding an overhaul of the proposed ESF framework.⁹⁸ The statement alleges that despite engaging in the review process for more than two years, attending online and in-person meetings, many of the inputs were not meaningfully included. They lauded the Bank for holding 84 online consultation events, ten in-country consultations, and seven project consultations with directly affected peoples, but argued that the ADB's Office of Safeguards had not explained how CSO inputs had been addressed in the policy document. The document did not commit to the 'Do no harm' principle and had flexible terms. Thus, civil society called for timebound, mandatory, and compliant standards. They also argued that flexibility in the application of borrower systems must be revoked from the ESF.

The NGO Forum on ADB has noted that:

Our analysis of this ESF White paper reveals a policy that seeks to dilute binding regulations from the SPS 2009 standards through the Mitigation Hierarchy approach, allowing borrowers to bypass EIAs and SIAs prior to board approval for high and medium-risk projects. This places the environment and local communities at direct risk from all ADB project operations.⁹⁹

Because the paper fails to identify the ADB Project Cycle and thereby cannot ensure how and when the approach will address project-related harms.¹⁰⁰ Moreover, the paper uses a new term: The Common Approach Applicable to Co-Financing of projects between ADB and other MDBs. Because it does not commit to the highest standard of safeguards and rather speaks about a common approach, this may mean lower than usual standards when projects are financed.¹⁰¹

Gender

The ADB's strategy 2030 considers accelerating progress on gender equality as an operational priority. Gender Action assessed the ADB's Operational Plan for Priority 2: Accelerating Progress in Gender Equality (2019-2024) and found it to be the top performing PDB on paper. It was strong in terms of goals, priorities, and mechanisms and thematically, the AfDB gender approach was strong in terms of unpaid care work, gender and climate change; gender, environment and biodiversity and SGBV and SEAH. It was adequate in terms of sexual and gender minorities, staffing and M&E.¹⁰² The policy fell short in terms of its mandate.

The analysis found the ADB Safeguard Policy from 2009 to be adequate in terms of its gender mandate and weak on reference to discrimination and human rights, information disclosure, resettlement, environmental and social risks, debt, climate change, environment and biodiversity, and consultations and consent.¹⁰³ In the NGO Forum submission to the revised ESF, as mentioned above, CSOs accused the ADB policy of being gender blind, requiring immediate and binding language on the fundamental rights of women.¹⁰⁴



©NGO Forum on ADB Asian Development Bank (ADB) Annual Meeting, South Korea

The Accountability Mechanism

This is a forum where people that are adversely affected by ADB projects can seek solutions to their problems, and report non-compliance of the ADB's operational policies and procedures. The ADB's Accountability Mechanism (AM) was established in 2003, replacing the 1995 Inspection Function. Civil society started engaging the ADB on this from 2008 and submitted comments when the AM was reviewed in 2011 and 2012.

The Accountability Mechanism has two separate offices: the Office of the Special Project Facilitator (OSPF) and the Office of the Compliance Review Panel (OCRP), which support the Compliance Review Function (CRF). The OSPF and OCRP work jointly in conducting outreach activities aimed at making the mechanism better known and understood both within and outside ADB. It has two phases: a consultation phase and a compliance review phase. To file a claim, complaints should be addressed to the Office of the Special Project Facilitator. It should include contact information, statements on how the complainant would be harmed by an ADB project, a brief description of the project, ways in which the complainant would like the ADB to help, and a description of steps taken to raise the issue with Bank management. Details of how to file a complaint are found [here](#).

In the past redress for affected communities has been slow and limited. In part, this was because of challenges of monitoring, and a lack of capacity and diverse policy frameworks.¹⁰⁵ However, it is worth noting that the ADB now has a webpage that gives a quick breakdown of complaints received by the compliance review panel.¹⁰⁶ It shows that in 2023-2024, roughly 24.4 per cent of complaints related to resettlement, compensation, land acquisition, and valuation; while 25.6 per cent related to information, consultation, and participation; and 20.9 per cent related to the environment. Community and social issues encompassed 15.1 per cent.

Nevertheless, there have been critiques of the AM. The Accountability Counsel notes that the ADB's mechanism is 'woefully behind good practice and needs to reform urgently'. They noted that they have benchmarked ADB's AM policy against its sister institutions to demonstrate how ADB lags behind on good practice.¹⁰⁷

Statement

Some of its fundamental shortcomings are:

- ADB's Office of Special Project Facilitator is not independent from the management and is required to report to the President.
- ADB requires communities to engage with the Operational Department responsible for the project before accessing the AM.
- ADB does not consult communities on the Management Action Plan prior to board approval.

The Accountability Counsel also made a submission to the ADB's Board of Directors. They argued that the ADB's eligibility criteria was problematic as it required prior good faith engagement with management. Many communities fear reprisals from Bank actors that are engaged in environmental and social harm, but also because communities are unable to raise issues directly. Thus, communities are denied the right to representation because they are limited by who can advise them.

This was the case in a complaint that CSOs submitted to the ADB's AM on the Imphal Town Ring Road in India. This had been a site of much controversy since it was first initiated in 2014. The road was aimed at improving road connectivity and trade. International consultants conducted the feasibility study, with support from the ADB. Affected Indigenous communities objected to the survey due to a lack of consultation, a limited impact assessment, and an unfair assessment of their assets. They submitted complaints to the Office of the Compliance Review Panel of ADB on 15 December 2014. The project was delayed for several years, until 2020. Once work resumed, a complaint was filed to the accountability mechanism again in September 2023 and was found to be ineligible on 3 January 2024. The complaint filed to the accountability mechanism was found to be ineligible. The criteria states that there must be prior engagement with local authorities, who had previously failed to respond.

©NGO Forum on ADB Karl Isaac Santos - Civil society demanding the ADB to strengthen environmental and social safeguards.



However, the Centre for Research and Advocacy in Manipur went to the ADB Annual meeting in 2024, while also engaging the ADB country team and the media. The Public Works Department has since agreed to ten public hearings, which is unprecedented.¹⁰⁸ For further details on the case study, visit the [Toolkit](#).

In addition, the Accountability Counsel has argued that the ADB failed to enable meaningful remedy to communities for social and environmental harms. Currently the CRP can only make a finding on non-compliance and does not have a mandate to provide for remedial action. Monitoring is also limited to a prescribed number of years, which means that not all harm is remedied. Finally, the AM should have a clear and rights-based policy for addressing reprisals.¹⁰⁹ Furthermore, the NGO FORUM has submitted comments in relation to the AM. It claims that project-level grievance mechanisms are not effective because they are not meaningfully accessible by communities, they do not protect complainants from backlash and retaliation, and they do not have access to remedy. The FORUM therefore demands that engaging with local grievance mechanisms should not be a pre-requisite for engaging with the AM.¹¹⁰ This has led to the FORUM leading a campaign that the ADB should be stripped of immunity, citing cases filed to domestic courts for the IFC.¹¹¹

Evaluations of civil society engagement

The ADB claims that it has progressively mainstreamed CSO engagement across its operations, claiming that in 2016, CSOs were involved in 96 per cent of sovereign projects.¹¹² It further notes that reforms that are under way, such as simplifying contracting procedures and mainstreaming partnership arrangements with CSOs, will help expand this collaboration further. ADB has also joined new initiatives such as the Open Government Partnership, which promotes transparency, empowers citizens, seeks to fight corruption, and harness new technologies to strengthen governance.

NGO Engagement

In its webpage on engagement with NGOs, the Bank notes that engagement has worked along the following lines:

- By building strategic partnerships with NGO networks, such as WWF on information sharing, knowledge management, and capacity building.
- Working closely with CSOs to reach vulnerable minorities and disadvantaged communities.
- Working with CSOs to monitor projects.
- Working with CSOs to respond to disasters such as cyclones.
- Holding the ABD accountable.

In 2015, the ADB produced a publication detailing the range of ways in which CSOs are engaged in ADB operations in South Asia. The study was designed to encourage further thinking about the different contexts in which civil society could engage. The study primarily considered CSO engagement in the implementation of 33 projects, followed by an overview of CSO involvement in planning and assessment of projects and country programmes.¹¹³

In terms of project implementation, it looked at NGOs as contractors for a range of services in the implementation of loan projects, community-based organisations as target groups and beneficiaries on loan projects and NGOs as providers of technical assistance. The study found that the predominant way of collaborating with NGOs was through project implementation. NGOs are contracted competitively to deliver services. NGOs are appreciated for their field presence, experience in community outreach and social mobilisation, and ability to communicate clearly and in local languages. However, some NGOs lack familiarity with bidding, contracting, and project management processes. The study found that in project documents, even when a role is envisaged for an NGO, these documents are not specific about how they would be involved or the expected results. It is therefore critical to assess NGO capacity, with efforts to develop this for more sustainable engagement.

In terms of engagement with Community-Based Organisations (CBOs) as beneficiaries of loan projects, the study found that CBOs are not only important in service delivery but also to achieve specific objectives in areas such as in improving agricultural productivity, or in ensuring the sustainability of investments in rural infrastructure such as water pipes and irrigation systems. CBOs have been critical in supporting women's participation and leadership, as well as their access to information and benefits. Finally, in terms of technical assistance, NGOs can play an important role in community engagement more broadly, as well as in specific sectoral or thematic areas. However, project documents lacked a clear idea of what was being tested, which outcomes would be assessed and how these outcomes would be monitored.¹¹⁴

The ADB study also looked at in planning at the project and country levels. It found that, while there was engagement at the project level, there was no documentation of the types of CSOs consulted or the depth and quality of these consultations.¹¹⁵ This was reaffirmed by the Executive Director of the NGO Forum on the ADB in 2021, who argues that the ADB mostly uses consultants to carry out social and environmental assessments. Rather than engaging in field-level assessments, the Bank's safeguards specialists spent most of their time simply editing and consultant reports.¹¹⁶ The 2015 ADB study found that civil society can play an important role raising awareness and acceptance of the potential negative impacts, or by identifying measures that could extend the positive impacts. At the country level, NGOs were generally consulted at a late stage, after priorities and activities had been established. This study, as well as the 2006 evaluation, noted that any more than this may be unrealistic, since this is essentially a bilateral discussion between the ADB and a member government. There was also little documentation of what was done with the feedback. The study also found that consultations varied according to country – dependent on the extent of civil society and level of trust with the government.¹¹⁷ In terms of corporate strategy and policy, the ADB has consulted NGOs and other stakeholders in the development of various policies and publishes the list of strategies or policies to be reviewed on its website. At its annual meetings, the ADB has increasingly invited NGOs and CSOs to panels, while also showcasing projects.

The study also notes that more could be done to learn from the expertise and working methods of NGOs and to engage them as participating organisations in development efforts. They outline a case whereby NGOs in Bangladesh were given grants to reduce the purchase price of solar home systems, who then on-lend to customers in rural areas, install systems, monitor their performance, and provide maintenance and technical support. The study also cites an evolving institutional partnership with WWF, where a memorandum of understanding was signed in 2001 and allowed programme-level collaboration.¹¹⁸

In 2016, the NGO and Civil Society Centre (NGOC) conducted a review of ADB policies and operations, arguing for deeper collaboration throughout ADB operations.¹¹⁹ The ADB then developed a cluster for technical assistance on 'Deepening Civil Society Engagement for Development Effectiveness'. The Partnership for Transparency was then employed to build civil society capacity for engagement in the design, implementation, and monitoring of ADB projects, demonstrating civil society engagement and producing knowledge products.¹²⁰

Building on the 2015 publication, a new report in 2022 analysed ADB engagement in South Asia between 2015-2021.¹²¹ It found that engagement with CSOs was highest in the ADB's South Asia Department (SARD). Most of this engagement was through consultation during project implementation, although in about 38 per cent of instances, CSOs implemented project components. In these instances, implementation performed well. SARD was also adopting tailored approaches to engage CSOs in CPS. The study found that CSO engagement led to improved project design. It also showed the range of roles that CSOs could play in coordination and capacity development during project implementation. It found that CSOs could play an active role in service delivery during the implementation of ADB projects and that many CSOs are uniquely placed to assist in delivering social safeguards project implementation because of their strong community relations and their understanding of local norms and community presence. It showed that involving CSOs as beneficiaries at an early stage, increased the sustainability of a project and led to better development outcomes. It found that CSOs played an important role in technical assistance when engaging with excluded and vulnerable communities, and that there was an opportunity to increase CSO engagement in monitoring and evaluation and policy dialogue.

More broadly, the ADB has been developing reports since 2016 that illustrate highlights of the ADB's cooperation with civil society.¹²² The reports illustrate that engagement over the years has deepened from consultation in project implementation, to engagement in the design and monitoring of projects, particularly on the use of grassroots participatory approaches to help poor and vulnerable groups. There has also been greater engagement in CPS. It also lauds efforts to improving Institutional Processes for CSO Engagement. In 2020-2021 the ADB updated its Operations Manual on promotion of engagement with CSOs by providing a definition of CSO. It notes that 'ADB seeks proactive, meaningful, and productive engagement with CSOs to explore opportunities for increasing their involvement in the design and implementation of ADB operations, where appropriate'. Realising the diversity of CSOs and the differences among different countries, it recognised a flexible range of mechanisms appropriate to different contexts.¹²³ As noted in the 2022 report, the ADB has also approved a new indicator for assessing civil society engagement to capture their meaningful participation. The ADB's NGOC now reviews the reports of all completed projects each year to determine whether the meaningful engagement planned at the project design stage materialised into CSO participation during implementation.

In 2022, the NGOC assessed documents upon project approval, particularly the reports and recommendations of the President to the Board of Directors, together with the Summary Poverty Reduction and Social Strategies and other linked documents.¹²⁴ The review covered 106 projects, which closed in 2022, to determine if they included elements of planned meaningful CSO participation. Of the 54 completed projects in 2022 with planned meaningful civil society engagement, 46 or 85 per cent delivered their meaningful CSO engagement plans.

The 2022 ADB report on highlights of the ADB's cooperation with CSOs also notes positive developments, such as outreach to nearly 1 000 CSO representatives in the review of the ADB's Safeguards Policy, consultations on the ADB's Energy Mechanism as well as the ADB's Climate Change Action Plan and on natural gas and waste-to-energy guidance notes.¹²⁵ Civil Society also participated at the ADB's 55th Annual meeting, with a dedicated civil society programme. The report documented some accomplishments including peer learning among ADB's CSO focal persons, the meaningful engagement of young people in ADB operations, and knowledge sharing with other multilateral development banks through an online event 'Civil Society Engagement for Development Effectiveness', on 23-24 February 2022. The ADB marked the International Day Against Homophobia, Transphobia, and Biphobia on 18 May 2022 with a webinar titled, 'Driving Inclusion: Addressing Legal Barriers for Sexual and Gender Minorities'.

However, it should be noted that since these evaluations are done by the Bank, they will naturally be positive. The reports examine engagements with CSOs that are predominantly contracted to carry out projects, rather than explaining how they have incorporated CSO inputs in terms of policies.



©Both Nomads/Forus - farmer in Nepal



©NGO Forum on ADB - public action

Recommendations to CSOs to strengthen their ADB engagement

- Identify upcoming Country Strategies for review and advocate for CSO engagement.
- Advocate for regular meetings between CSOs, including the NGO Forum and other partners, to allow civil society to engage on policy dialogue, and monitoring and evaluation of these engagements.
- Advocate for the NGOC to feedback from critical voices (as well as contractors) and CSO influence on policy in its yearly evaluation reports on meaningful engagement with CSOs.
- Develop an independent evaluation of ADB cooperation with CSOs.
- Continue to advocate to ADB management that its Access to Information Policy include commitments to translation and the appointment of a focal point for handing access to information requests. Insist that that the ADB remove exemptions, overrides and vetoes, that it creates an independent uncompromised appeals panel and that it applies stringent information disclosure requirements to disclose information on financial intermediaries including third parties and when using a Country Safeguards System (CSS).
- Engage with Bank management to revise its Safeguards Policy. This would include a commitment to do no harm, timebound, mandatory, and compliant standards, remove flexibility in the application of borrower systems for the ESF and the mitigation hierarchy approach. Apply the UN Guiding Principles on Business and Human Rights to the Common Approach Applicable to Co-Financing of projects. Ensure the policy has language on gender.
- Engage the ADB management to bring the AM policy in line with good practice by enhancing its independence, removing clauses that insist on communities engaging country offices prior to accessing the AM, consulting communities on management plans, removing the clause on eligibility relating to prior good faith engagement, enabling meaningful remedy to communities for social and environmental harms and including a requirement for both clients and sub-clients to inform project-affected people about the availability of the AM. The AM policy should also redefine its monitoring mandate until all harm is remedied and contain language on reprisals.

05

Inter-American Development Bank

Development Bank



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Mandate and objectives

The Inter-American Development Bank (IDB) was formed in 1959 and is the main source of development financing in Latin America and the Caribbean. The IDB Group comprises the Inter-American Development Bank; IDB Invest, which works with the region's private sector; and IDB Lab, which experiments with innovative ways to spur more inclusive growth. The IDB's strategy 2023-2030 outlines its three core objectives, namely reducing poverty and inequality, addressing climate change and bolstering sustainable growth. Its six operational areas of focus include Biodiversity, Natural Capital and Climate Action; Gender Equality and Inclusion of Diverse Population Groups; Institutional Capacity, Rule of Law and Citizen Security; Social Protection and Human Capital Development; Sustainable, Resilient and Inclusive Infrastructure; and Productive Development and Innovation through the Private Sector and Regional Integration.¹²⁶

As with the AfDB and ADB, the IDB has a Board of Governors, comprised of member countries. Each governor has a voting power proportional to the country's capital subscribed in the Bank. There are 14 Executive Directors and an IDB President. There are 48 member countries. The United States is by far the largest shareholder (regional, non-borrowing), with 30 per cent of the share followed by Argentina, Brazil, Mexico and Japan.¹²⁷

Of the borrowing countries, besides Argentina and Brazil, Venezuela, Chile and Colombia are also large contributors. From the non-regional, non-borrowing countries, some of the biggest countries besides Japan are France, Germany, Spain and the United Kingdom. Canada is also a large regional non-borrowing member. The IDB has offices in 26 countries, with headquarters in Washington DC and two other offices in Japan and Spain. It also has five departments in the region. Further details are found [here](#).

The IDB notes that its institutional strategy was informed by the 'broadest public consultation process in our history'.¹²⁸ This began in 2023, and the Strategy was approved in March 2024. During the consultations, CSOs emphasised the need to pay adequate attention to the experience of affected communities. It also stressed the need to apply principles of good governance and to improve upstream planning.¹²⁹

Frameworks for civil society engagement

IDB Timeline¹³⁰

2009

Civil society submits comments on IDB's proposed Independent Consultation and Investigation Mechanism (MICI) draft policy

2010

IDB releases revised MICI Policy

2011

Accountability Counsel sends a letter about MICI's functioning

2013

Accountability Counsel and partners submitted joint comments on the IDB's Independent Consultation and Investigation Mechanism Policy

2013

Civil Society participated in the IDB's annual meeting

2014

IDB releases updated MICI Policy

2017

Civil society submits joint recommendation of Disclosure of Information Policy of IDB Invest

2018

IDB Group-Civil Society engagement strategy developed

2018

Civil society makes a joint submission on draft Access to Information Policy of IDB Invest

2019

IDB approves Access to Information Policy

2019

Civil society submission on draft Sustainability Policy of IDB Invest

2020

Proposal for review of Access to Information Policy approved

2020

Civil society make collective recommendations on Environment and Social Policy Framework (ESPF)

2020

IDB approves new ESPF

2021

IDB develops a Civil Society Action Plan

2022

IDB working group makes a submission on the Access to Information Policy

2023

Civil society engagement on the new institutional strategy

2023

Civil society attended (but did not participate) in the IDB's annual meeting

2023

CSO submission on the lack of inclusivity on the Access to Information Policy

2024

Civil society participated in the IDB's annual meeting (ten-year gap)



©Finance in Common- Finance in Common Summit 2023 - Hosted by IDB, Bancoldex, and ALIDE

IDB-CSO engagement framework

Civil society engagement with the IDB was limited until recently, which is detailed under annual meetings below. With the change of Bank leadership, Ilan Goldfajn emphasised that the Bank would be revitalising its relationship with civil society and announced that the Civil Society framework strategy would be updated to broaden the range of civil society representatives that engage with the Bank, as well to improve the participation of civil society in IDB strategies.

CSO Recommendations

The recommendations given by civil society included calling on the IDB to strengthen:¹³¹

- the principles of good governance, including transparency, access to information and accountability.
- the meaningful participation of stakeholders and impacted communities in the framework of the projects it finances.
- the implementation of the IDB Environmental and Social Policy Framework and the IDB Invest Sustainability Policy.
- the prevention of retaliation against environmental and human rights defenders.

There is now an IDB Group-Civil Society engagement strategy on the IDB's website, which has replaced the 'Strategy for Promoting Citizen Participation in Bank activities' from 2004. It was approved in 2018.¹³² The Strategy makes provision for the measurement of engagement of civil society with quantitative results, as well the measurement of added value.

It notes that the previous strategy revealed a number of issues that needed to be revisited, and outlined the need for (i) a common vision, and strategic pillars of action across the entire IDB Group; (ii) better harmonisation and internal coordination of civil society engagement across the entire IDB Group, so as to help achieve development objectives; and (iii) tools for the systematisation of the information on all the IDB Group's work with civil society, including the definition of baselines, metrics, and regular evaluations. It analysed the Bank's work along five levels, namely: (i) the importance of expanding channels of access to information; (ii) the value added of forums for direct dialogue; (iii) due diligence for the effectiveness of public consultation; (iv) collaboration with civil society and its contribution to the Bank's stock of knowledge on the region; and (v) leveraging resources achieved by strategic partnerships with civil society and their contribution to bringing the Bank closer to its beneficiaries and stakeholders.

The Strategy is complemented by an Action Plan for Implementation of the IDB Group-Civil Society Engagement Strategy for Operations and Initiatives (2019-2021)¹³³. The Action Plan notes that the IDB Group-Civil Society Engagement Strategy needs to be integrated with: (a) the new update to the IDB Group Institutional Strategy; (b) the environmental and social operational policy frameworks of the IDB Group and Access to Information; (c) other documents and initiatives with a crosscutting focus, such as gender, climate change, and migration issues. The Action Plan makes a case for training Bank staff on how to improve public consultation, on the use of complaint mechanisms, civil society capacity building options and support to the preparation of government national action plans.

The strategy makes provision to strengthen civil society involvement in IDB annual forums, and to strengthen and fine tune the role of civil society consultative groups, and to foster forums for social innovation and thematic knowledge. It aims to strengthen CSO access to relevant knowledge networks, strengthen CSOs institutional training and incentivise the consolidation/formation of forums for sector collaboration. It allows for greater civil society engagement in country strategies and the mainstreaming of a gender perspective. It intends to update guidelines for public consultations with the IDB, and training to IDB teams to improve these processes, as well as training on environmental and social risks and complaint mechanisms. It also outlines that engagement with CSOs would be measures in terms of effectiveness, value added and contribution to knowledge of the social fabric.

Most importantly, it intends to develop strategic partnerships with civil society by promoting opportunities to engage with existing programmes, mobilising resources for initiatives such as the Civil Society and Institutional Capacity Training Programme and piloting projects to generate knowledge on issues such as the value added of citizen participation on transparency issues; citizen participation and opportunities for social innovation; and digital transformation and future-oriented changes in citizen participation. It also intends to approach CSOs to conduct public policy evaluation initiatives and to work with community organisations in rural areas to identify key monitoring indicators and effective feedback mechanisms for the execution of Bank projects.



©CHRD joined 20+ civil society groups and affected communities at the #IDBAnnualMeeting, raising independent voices to demand #IDBGroup respect human rights in its projects.

Engagement

Engagement with civil society has also been included in the Update to the Institutional Strategy, from 2015 noting that:

the IDB will work mainly with national and subnational governments and the private sector but will also engage with civil society and regional groups and other multilateral development banks and donors. Recognizing their individual strengths, the IDB will work with each stakeholder, with the understanding that helping balance their interests and creating spaces for collaboration can create synergies and increase the development impact of its interventions.¹³⁴

Institutional capacity for engaging civil society

• IDB Focal Points

The IDB website states that citizen/civil society engagement topics are led by the [Vice Presidency](#) for Countries from Washington DC. However, there is also a civil society focal point. It appears that the person responsible for internal and external capacity building and management has not yet been appointed. There is a person appointed to deal with WiConnect content management (the newly developed Bank-civil society digital platform) and technical support for the Public Consultation Platform and someone who deals with institutional strengthening external organisations. There is also the external team that deals with stakeholder inclusion. Country focal points are also given.¹³⁵

• Annual meetings

Many CSOs did not work with the IDB for various reasons until recently, while the Bank was not the target of advocacy. At the same time the Bank was closed to receiving input from civil society and did not like being scrutinised.¹³⁶ In September 2022, the Institution's President, Mauricio Claver-Carone, was removed from his position for serious ethics violations. Civil society immediately used the opportunity to advocate for a cultural shift in the organisation that opened space for civil society and project-affected peoples to engage at all levels of the organisation.¹³⁷ In the past, civil society accused the Bank of increasing inequality, by supporting forced displacements, excluding marginalised groups from project benefits, or exacerbating gender inequality. It was also argued that, despite the Bank's rhetoric around climate change, many projects financed by the group continued to support conventional energy sources. The Bank was urged to develop a new Environmental and Social Policy Framework (ESPF).¹³⁸

In 2022, Ilan Goldfajn was elected as IDB president.¹³⁹ For the first time since 2013, civil society was invited to play a role in the IDB's 2023 Annual meeting, where representatives from about 30 environmental and human rights organisations and affected communities, who formed part of the IDB working group were invited to participate.¹⁴⁰ Civil society proactively sent lists of CSOs that should be invited to improve participation, but comments were monitored and they were not given a question and answer session.

• IDB Coalitions

Civil society has established a working group on the IDB made up of more than 60 organisations. This is led by the Coalition for Human Rights in Development and was established in 2019. The coalition was formed after different organisations that had been engaging through an informal coalition decided they needed a more structured approach. This allowed them to strengthen the ESPF, while they also began systematically pushing for better inclusion of civil society in other areas. This led to the development of the Amazon initiative, whereby communities were supported to engage on projects, push for structural changes and begin conversations on ways to institutionalise effective channels for civil society engagement.¹⁴¹ In November 2019, the IDB also began to review its Access to Information Policy.

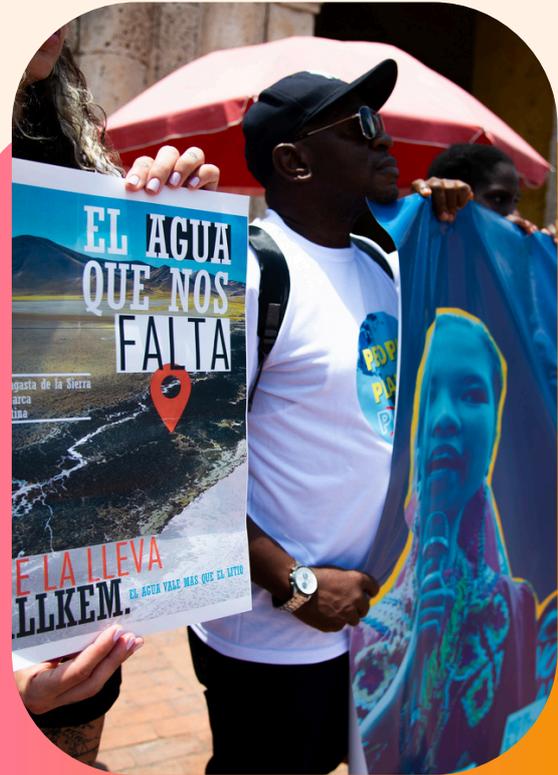


The IDB Working Group has since documented how forming coalitions led to the creation of the IDB working group.¹⁴² As a result of systematic engagements, civil society notes that the improvements in incorporating recommendations into the ESPF, the incorporation of civil society into the 2024 Annual meeting, better engagement on IDB projects, and steps to operationalise the commitment in the ESPF not to tolerate reprisals, including producing a technical note on reprisals for bank staff and putting management-led grievance mechanisms in place for IDB and IDB Invest. The IDB has taken into account several of the WG's critiques and recommendations on how to strengthen the design of the Amazon Initiative. Moreover, as a result of advocacy, Independent Consultation and Investigation Mechanism of the IDB (MICI)'s report on Guatemala hydropower projects included a recommendation that, should the IDB Invest divest from the project, management should develop a responsible exit plan. Following this the Development Finance Corporation and the IDB Invest declined to support the Jilamito Hydroelectric Project in Honduras, Marfrig in Brazil, and Trecca in Guatemala.¹⁴³

• Communication and outreach

In the past, civil society has noted that certain units at the IDB are unwilling to meet civil society. However, because civil society cannot meet directly with key decision-makers, they cannot share messages about critical issues they see in project implementation, nor can they share lessons learned to improve IDB operations in the future. They urged senior management to send the message to all units of the Bank that civil society engagement is a core function for all levels of management, and the civil society team at the IDB should be prepared to facilitate these meetings and connections.¹⁴⁴

Now, the civil society action plan makes provision scaling up communication and outreach, including the development of an internal and external communication strategy that will be developed and implemented at the regional level.¹⁴⁵ The action plan also makes provision for communications strategies at a national level. It also proposes the use of analytical tools by country offices to track civil society perceptions, using the latest technologies. To bolster capacity, the IDB has also launched WiConnect3, an online digital platform to showcase the CSOs from Latin America and the Caribbean. The platform can be used to find CSOs across the region and is intended to highlight the work it does.



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Engaging with civil society on specific Bank policies and operations

Access to information

The Access to Information Policy was reviewed in 2019. Details on how to access information can be found [here](#). Civil society accused the Bank of holding limited consultations, which were invite-only.¹⁴⁶ Moreover, some have argued that that the biggest gap in the policy was the exception for country-specific information, which they claim that no other PDB has. Civil society pointed to a 2013 review of the Office of Evaluation and Oversight which found that the ‘broadly written’ exception to country-specific information was inconsistent with the Bank’s core principle of transparency and that this could undermine the whole access to information reform endeavour. In this way, countries could object to the publication of virtually any information, making it hard for CSOs to access information on country-specific projects.¹⁴⁷

In 2022, a group of CSOs made submissions to the IDB, which included a commitment to access to information as a fundamental human right, recommendations for implementation, commitments to maximum disclosure of information and the avoidance of ambiguous language to prevent different interpretations. The letter also recommended that the Bank specify what information is to be published proactively, disclosure times, formats, channels, and timeframes. It also requested data protection and the possibility of anonymous requests for information.

It further demanded that the Bank make explicit that the ultimate decision in the management of information resides with the Bank, that it make exceptions more precise and establish clear criteria for their application and that it incorporate the criterion of public interest in the harm test. It also suggested a platform to publish requests for information and their responses, open data, simple language, accessible formats, and usability of the information. In addition, it asked for a mechanism for requesting information and a review mechanism, as well as a system of indicators of transparency and effectiveness of the use of information.¹⁴⁸

In 2023, a civil society group wrote a letter to the IDB stressing that the consultations in the Access to Information Policy (AIP) had not been 'meaningful, robust, accessible, diverse, or inclusive, nor are they organised on the basis of participatory agendas'.¹⁴⁹ They further asserted that substantive information for engagement had not been shared in time, and that there had been no receptivity to the concerns raised. They argued that the IDB cannot simply count the number of organisations included in consultation but should rather examine how their input made a difference in measurable outcomes, while also reaching out to critical and independent civil society, marginalised groups, and people affected by IDB Group projects (including those that had requested the independent accountability office, MICI, for investigation). The working group has continued to engage the IDB on matters of representation and inclusion, including at the annual meetings, as well as more regularly on thematic issues. The new AIP was approved in June 2024. It is unclear yet as to how many civil society recommendations were incorporated.

Environmental and Social Protection Framework

The IDB's Environmental and Social Protection Framework (ESPF) was approved in 2020. At the same time, IDB Invest also adopted a new Environmental and Social Sustainability Policy. In the initial engagements of the Bank's ESPF consultations, civil society argued that the Bank's consultations were not meaningful and inclusive. They point to a number of factors as to why this was, including untimely logistics and coordination, the lack of an agreed agenda, lack of diversity and outreach and a lack of clarity on how the IDB would take into account the recommendations needed.¹⁵⁰

Civil society made submissions on the first and second draft in 2020, which further criticised the consultations as lacking meaningful dialogue with civil society.¹⁵¹

As mentioned earlier, as a result of continued advocacy, civil society now notes that more than 60 recommendations have been incorporated to bring the policy in line with international standards.¹⁵² This included an exclusion list; a commitment not to tolerate reprisals; strengthened requirements for IDB's monitoring and supervision and due diligence; clearer roles and responsibilities for IDB and borrowers; specific protections for marginalised groups, which include ensuring that these populations have access to project benefits; strengthened requirements for the identification of E&S risks and impacts; adoption of child labour standards; and that biodiversity offsets are not an acceptable mitigation measure in instances of critical habitat. The ESPF now includes a standalone safeguard policy on stakeholder engagement. The new policy also includes a reference to the Regional Agreement on Access to Information, Public Participation and Justice in Environmental Matters in Latin America and the Caribbean (Escazu agreement) and requirements on reprisals and retaliation. Escazu is the first legally binding instrument in the world to include provisions on environmental human rights defenders and is also the first environmental agreement adopted in Latin America and the Caribbean.¹⁵³

However, a more institutionalised approach is needed to assess the risk of reprisals, to put in place preventative measures and to respond to events when they occur.¹⁵⁴ The Alto Maipo Hydroelectric Project in Chile and the San Mateo and San Andres Hydroelectric Projects in Guatemala have both been examples of projects where the lack of preparation, mitigation or response to reprisals not only threatened those speaking out against the project, but the whole community. Civil society has argued for a greater contextual assessment of risks in the due diligence process, better engaging stakeholders in project design to prevent and mitigate risks, a protocol to respond quickly to reports of reprisals and more staff and resourcing to address the issue of reprisals.¹⁵⁵

Despite these developments, ongoing criticisms include the limitation of many commitments, the Bank's discretion to demand compliance, and the explicit transferral of liabilities to the client.¹⁵⁶ In addition, there have been critiques that these provisions are not implemented in reality, with civil society citing an example in El Salvador where civil society had a meeting with the Bank, only to discover that their identities had been shared with the Borrower without their permission, putting civil society groups at risk. Civil society urged that the Environmental and Social Solutions Unit's (ESG) be better incorporated into the IDB's institutional structure, with greater roles and responsibilities, and that the IDB be given capacity building and training to better support implementing agencies.¹⁵⁷

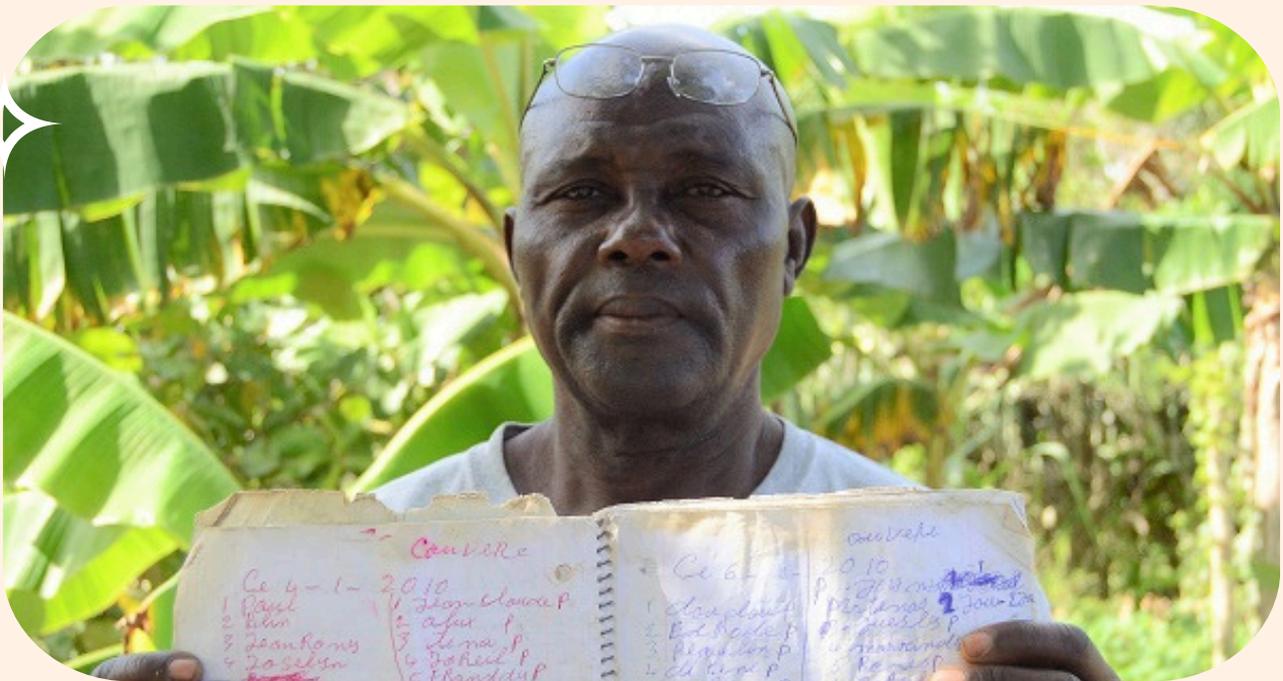
Gender

The IDB does not have a specific gender policy but outlines gender in its Environmental and Social Policy Framework, Standard 9 (2021). Gender Action ranked the IDB fourth in terms of the PDBs that it reviewed for gender. It is strong in terms of goals, adequate in terms of priorities and mechanisms, and weak in terms of its mandate. Thematically, the IDB gender approach was strong in terms of SGBV and SEAH and sexual and gender minorities. It was adequate for unpaid care work; gender and climate change; and gender, environment and biodiversity. It was weak in terms of staffing and gender M&E.¹⁵⁸

The analysis also looked specifically at the Environmental and Social Policy Framework (2020) of the IDB and the Environmental and Social Sustainability Policy (2020) of IDB Invest. It found the IDB policy to be strong in terms of its gender mandate, environmental and social risks and information disclosure. It was adequate in terms of its reference to discrimination and human rights, consultations and consent and resettlement. It was weak on debt, climate change and environment and biodiversity.¹⁵⁹ The IDB Invest policy was not strong on anything. It was adequate on environmental and social risks, information disclosure and consultations and consent. It was weak on its mandate, debt, discrimination and human rights, climate change, biodiversity and resettlement.

Independent Consultation and Investigation Mechanism

The IDB's Independent Consultation and Investigation Mechanism is known by its Spanish acronym, MICI. This mechanism is independent of the Bank's management and project teams. It offers two instruments: dispute resolution and investigation of compliance.¹⁶⁰ MICI's guide to filing a complaint can be found [here](#). The latest MICI policy was approved in 2014. This mechanism has been accused of lacking transparency. At the IDB annual meeting, one member of the IDB Working Group cited a study conducted by Accountability Counsel, which analysed more than 230 complaints filed with the MICI between 2010 and 2023, establishing that in 31 per cent of the cases such complaints originated from a lack of transparency and participation.¹⁶¹



©Haitian farmers displaced by the Caracol Industrial Park, with support from Accountability Counsel and partners, secured a historic agreement to restore their livelihoods.- Marilia Leti ActionAid

The Accountability Counsel was very active in engaging MICI between 2009-2014 on its Draft Guidelines for the Consultation Phase and the Draft Terms of Reference for the Roster of Process Facilitation Experts, making a number of submissions.¹⁶² In 2018, the Accountability Counsel and partners submitted comments on the draft Consultation Phase Guidelines developed by MICI to standardise its approach to the consultation phase according to its policy requirements, and ensure ethical, transparent, and effective case management.¹⁶³ The approved guidelines in 2018 incorporated much of Accountability Counsel's input. This includes, but is not limited to, changes reflecting that during a consultation phase process, parties should receive impartial and fair treatment, as opposed to equal treatment.

In 2021, the Inter-American Development Bank's Office of Evaluation recently published its evaluation report of MICI.¹⁶⁴ It examines how certain eligibility restrictions have created confusion among would-be complainants or otherwise restricted access to MICI. The report critiques several factors undermining the independence of MICI. It also describes how cases that go through a compliance review too frequently fail to result in corrective action that remedies the harm incurred by local communities.

Civil society has also engaged on the MICI through the revised ESPF. The new ESPF includes language to instruct Borrowers to provide project-affected people with information about MICI, in addition to the project grievance mechanism and clarifies that access to the MICI is not contingent on the exhaustive use of the project grievance mechanism.¹⁶⁵ Civil society has, however, urged the Bank to provide concrete guidance on how to structure or operate an effective grievance mechanism at the project level based on the UNGPs (namely principle 31 which outlines the criteria for Non-Judicial Grievance Mechanisms),¹⁶⁷ as well as how to structure this in accessible and culturally appropriate formats.¹⁶⁸ As a result of civil society advocacy, MICI's final report on Guatemala hydropower projects included a recommendation that, should the IDB Invest divest from the project. The recommendation responds to what communities had been advocating for in the context of the MICI case. The case study illustrates how a project complaint can lead to policy change. However, concrete remedies for the community are yet to be enacted, which have been complicated by elections. The construction has been abandoned, and creates risk to communities, particularly in rainy season (see the Toolkit for more details). Members of the IDB Working Group continue to support communities with MICI complaints.



Evaluations of CSO engagement

The IDB's Action Plan for Implementation of the IDB Group-Civil Society Engagement Strategy for Operations and Initiatives (2019-2021)¹⁷⁰ analyses civil society engagement activities carried out between 2016 and 2017.¹⁷¹ The IDB Group can be identified as having initiatives or operations at all levels of strategic engagement: information (11 per cent); dialogue (24 per cent); public consultations (16 per cent); collaboration (19 per cent); and partnerships (30 per cent). In a departure from the past, the action plan identified opportunities such as stepping up the IDB's guidance to regional governments, taking a bottom-up approach to enhance project design and implementation through civil society involvement and participation; learning about success stories of citizen participation and social innovation processes and/or social demands and/or emerging groups; expanding and empowering channels for communication and engagement by means of the new technologies available; and scaling up civil society partnerships. Specifically, the IDB's action plan takes cognisance of the IDB External Evaluation Report from 2016. It found that only half of CSOs reported being satisfied with IDB participation in public consultations for specific projects. The situation was similar in the case of civil society participation in IDB strategies and/or policies (54 per cent satisfaction) and in preparing country strategies (56 per cent satisfaction).



Recommendations to CSOs to strengthen their IDB engagement

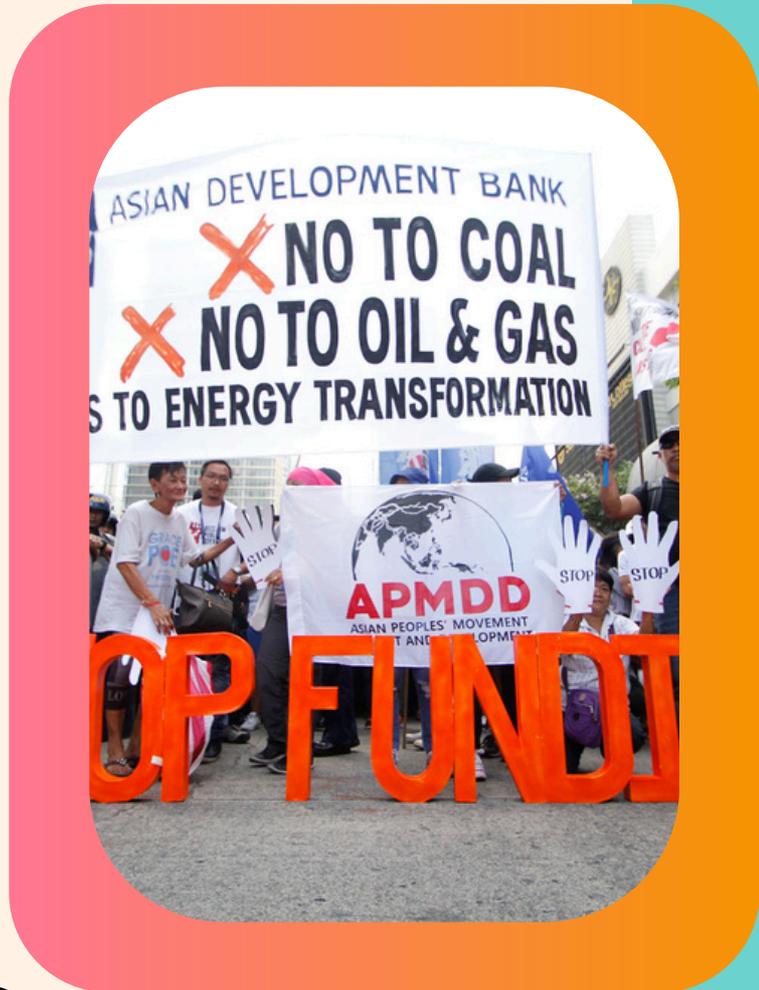
- Advocate for the IDB to institutionalise civil society participation in annual meetings.
- Insist that IDB management implement the Action Plan for Implementation of the IDB Group-Civil Society Engagement Strategy for Operations and Initiatives (2019-2021), including integrating the IDB Group-Civil Society Engagement Strategy with the new update to the IDB Group Institutional Strategy; the environmental and social operational policy frameworks of the IDB Group and Access to Information; other documents and initiatives with a crosscutting focus, such as gender, climate change, and migration issues.
- Work with Bank management to strengthen and fine tune the role of civil society consultative groups.
- Consider other forums for IDB-civil society engagement to foster innovation.
- Pilot projects to generate knowledge on issues such as the value added of citizen participation on transparency issues.
- Analyse the new Access to Information Policy to assess if there are remaining gaps, and which CSO inputs were incorporated.
- Work with IDB management and MICI to provide concrete guidance on how to structure or operate an effective grievance mechanism at the project level based on the UNGPs, and should structure this in accessible and culturally appropriate formats.



Conclusion



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06



As has been seen in this review of civil society engagement across the AfDB, ADB and IDB, civil society has tried to engage extensively with these Banks in a variety of ways – Appendix 1 provides a summary of CSO engagement with the AfDB, ADB and IDB. Engagement takes time and perseverance and civil society has consistently called for greater and more meaningful participation, and for Banks to take greater responsibility on how they lend, who they lend to, and what they lend money for, with some success stories.

At the AfDB, civil society has repeatedly called for their inclusion in annual meetings. The CSO Forum, which was separate to these meetings, has been an insufficient platform for engagement, and civil society has now proposed new institutional arrangements for engagement with civil society that the AfDB can consider at its annual meetings, drawing on the experience of other banks. At the ADB, civil society has long participated in annual meetings, although it has criticised the Bank from both outside and inside the halls. CSO campaigns to decarbonise the Bank have, for example, been successful in the ADB renouncing its funding of coal on paper, but not in practice. At the IDB, civil society has made inroads and was represented in panel discussions at the IDB for the first time in over a decade at the 2024 meetings. More can also be done to engage CSOs in the development of country strategies. There are some small improvements across the AfDB and ADB, but this can be further institutionalised.

While CSOs have formed working groups on the AfDB and the IDB, there are also coalitions working on the ADB, namely the NGO Forum on the ADB and Reality of Aid. The AfDB has also revitalised its CSO committee, while the IDB Action Plan for Implementation of the IDB Group-Civil Society Engagement Strategy for Operations and Initiatives (2019-2021) now offers to develop the role of civil society consultative groups.

This report also shows PDB policies are often insufficient to ensure accountability. Despite policies that improve access to information, and which are designed to protect environmental and social safeguards, language ambiguity, exemptions, overrides and vetoes limit the ultimate accountability of Bank structures. These are some of the criticisms levelled at the ADB. The IDB is reviewing its policy, and CSOs have made submissions for higher-level commitments to human rights, greater accessibility to information, timebound commitments to disclosing information with specific formats and channels, avoidance of language ambiguity, and removing the country specific information exception. At the African Development Bank (AfDB) research by the International Accountability Project found that the Bank fell short of fulfilling communities' right to information in several areas, including the level of disclosure for information on project-specific risks, as well as efforts to mitigate these.¹⁷² Therefore, CSOs need to continue engaging PDBs to ensure that they uphold best practices of access to information, rather than minimum standards, while also shouldering the overall responsibility for access to information rather than placing the onus on Borrowing countries.

Safeguards policies can also be improved. At the AfDB, CSOs have now made submissions on the ISS, including a greater monitoring role for the Bank (including for project-level grievance mechanisms but also more broadly), a stand-alone Indigenous person's policy, more inclusion of marginalised groups, more steps to address reprisals, better stakeholder engagement and measures for remedy. At the ADB, CSOs have called for a complete overhaul of the ESF, noting that standards have been further diluted through a Mitigation Hierarchy approach and the Common Approach Applicable to Co-Financing of projects.

Successful advocacy at the IDB resulted in the uptake of more than 60 recommendations, including language to instruct Borrowers to provide project-affected people with information about MICI, in addition to the project grievance mechanism and clarifications that access to the MICI is not contingent on the exhaustive use of the project grievance mechanism. However, the IDB still needs to develop an effective grievance mechanism at the project level based on the UN Guiding Principles on Business and Human Rights.

Beyond policies, this report illustrates that the accountability mechanisms of PDBs are limited by the way they are structured – unable to trigger legal proceedings and bound by the decisions of management. The AfDB's IRM has made some achievements, including the decision to appoint trusted CSO advisors to strengthen community access to information, and the development of an anti-retaliation toolkit. While this offers concrete advice, communities still face risks of reprisals, particularly in repressive Borrowing countries. The ADB's mechanism, on the other hand, continues to lack independence, and had burdensome eligibility requirements. Communities are not consulted on remedy, and there is limited engagement with Indigenous peoples prior to projects being initiated. MICI has improved its guidelines, incorporating CSO recommendations into its consultation guidelines, but still faces shortcomings in terms of independence, restrictions on eligibility and a lack of corrective action for communities.

At the global level, the World Bank Group, specifically the IFC and the Multilateral Investment Guarantee Agency (MIGA), recently held consultations on the right to remedial action, which suggests a promising development for accountability. The UN Human Rights Office has also released a report on how PDBs can improve their responses to remedy, which civil society can use to advocate for similar standards across different PDBs.¹⁷³ There have also been efforts to sue some PDBs in national courts. One case involving the IFC in 2022 ultimately found that IFC was protected under the Foreign Sovereign Immunities Act but was important in its earlier ruling that international corporations were not protected from litigation. It also led to the IFC conducting some reforms and in raising awareness on the perils of development finance.¹⁷⁴

At the same time, CSOs continue to monitor the impact of PDB projects on communities, raising awareness through the media or through internal Bank channels and continuing to advocate for responsible exit strategies and the right to remedy. It is critical that this work continues to challenge the immunity of PDBs, advocating for them to be held accountable, like ordinary corporations (despite being multilateral in nature), and bound by international law and human rights. MDBs operate with tax-payer money and should therefore make a radical shift towards inclusive, people-centred and environmentally responsible development. It is also time that PDBs realise that engaging in due diligence will ultimately save time, money and improve their reputation, while also improving the lives of communities that they are intended to uplift.

These are some of the key messages that Forus and CSO partners have been raising at the FICS, where CSOs work together to promote common minimum standards across Bank policies on Access to Information, Safeguards and Accountability Mechanisms, demanding that this falls in line with international best practice and human rights law. CSOs further engage at the FICS to ensure that PDB projects and policies help achieve the SDGs and deliver effective climate and biodiversity action in line with the Paris Agreement and Kunming-Montreal Global Biodiversity Framework. PDBs such as the AfDB, ADB and IDB need to reform their models to one of a top-down approach to a model where community-led and human rights-based operations are the norm, not the exception.

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Footnotes

1. Peking University 'Public Development Banks and Development Financing Institutions Database' <http://www.dfidatabase.pku.edu.cn/> (accessed 13 September 2024).
2. Finance in Common 'Why finance in common?' [https://financeincommon.org/why-finance-in-common#:~:text=Public%20Development%20Banks%20\(PDBs\)%20are,by%20central%20or%20local%20governments](https://financeincommon.org/why-finance-in-common#:~:text=Public%20Development%20Banks%20(PDBs)%20are,by%20central%20or%20local%20governments) (accessed 13 September 2024).
3. MJ Romero 'What are the core features of a model Public Development Bank?' Eurodad 10 November 2020 https://www.eurodad.org/public_development_bank_core_features (accessed 13 September 2024).
4. CSO working group on the African Development Bank, with contributions from certain members of the Coalition for Human Rights in Development: Accountability Counsel 'Understanding the African Development Bank: A Guide for Civil Society Organizations and Communities' (April 2023) https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/6fb2dfb3-b0a3-4b21-b9a0-1b7ba96c9117_AfDB_Guide_English.pdf (accessed 13 September 2024).
5. AfDB 'AfDB – Statement of subscription and voting powers as at 31 August 2023' (2023) <https://www.afdb.org/en/documents/afdb-statement-subscription-and-voting-powers-31-august-2023> (accessed 13 September 2024).
6. Compiled by author, drawn from the literature review and interviews held with CSOs, Bank officials and project-affected communities (from the ADB, AfDB and IDB) between May-June 2024.
7. African Development Bank 'Cooperation with Civil Society Organizations: Policy and Guidelines' (October 1999) <https://www.afdb.org/fileadmin/uploads/afdb/Documents/Policy-Documents/10000024-EN-COOPERATION-WITH-CIVIL-SOCIETY-ORGANIZATIONS-POLICY-AND-GUIDELINES.PDF> (accessed 13 September 2024).
8. AfDB 'Framework for Enhanced Engagement with Civil Society Organisations' (2012) https://www.afdb.org/fileadmin/uploads/afdb/Documents/Policy-Documents/Framework_for_Enhanced_Engagement_with_Civil_Society_Organizations-06_2015.pdf (accessed 13 September 2024).
9. AfDB 'Civil Society Engagement' <https://www.afdb.org/en/topics-and-sectors/topics/civil-society/civil-society-engagement> (accessed 13 September 2024).
10. AfDB '2020 Civil Society Virtual Forum: Engaging civil society in building Africa back better after COVID-19 – General Report 26-27 November 2020' (2020) https://www.afdb.org/sites/default/files/2021/03/26/report_civil_society_virtual_forum_2020.pdf (accessed 13 September 2024).
11. Coalition for Human Rights in Development 'African CSOs urge AfDB to strengthen civil society engagement' (2016) <https://rightsindevelopment.org/news/african-csos-urge-afdb-to-strengthen-civil-society-engagement/> (accessed 13 September 2024).
12. Coalition for Human Rights in Development 'Press Release: CSOs urge AfDB to promote the interests of ordinary Africans over mega investors at its Annual Meetings' (2018) <https://rightsindevelopment.org/news/press-release-csos-urge-afdb-to-promote-the-interests-of-ordinary-africans-over-mega-investors-at-its-annual-meetings/> (accessed 13 September 2024).

13. Coalition for Human Rights in Development 'Joint Statement: AfDB should open space for civil society and communities' (2023) <https://rightsindevelopment.org/news/joint-statement-afdb-should-open-spaces-for-civil-society-and-communities/> (accessed 13 September 2024).
14. Coalition for Human Rights in Development 'The importance of creating space for meaningful civil society engagement at the 2024 AfDB annual meetings' (2024) <https://rightsindevelopment.org/news/the-importance-of-creating-space-for-meaningful-civil-society-engagement-at-the-2024-afdb-annual-meetings/> (accessed 13 September 2024).
15. IFI Working Group 'How can the AfDB better engage with civil society at its annual meetings?' (2024) <https://ifiworkinggroup.org/blog/how-can-the-afdb-better-engage-with-civil-society-> (accessed 13 September 2024).
16. Coalition for Human Rights in Development 'Civil society groups expelled from AfDB annual meetings' (2024) <https://rightsindevelopment.org/news/afdbam2024-civil-society-expelled/> (accessed 13 September 2024).
17. Coalition for Human Rights in Development 'Civil Society's key demands to the African Development Bank' (2024) <https://rightsindevelopment.org/news/civil-societys-key-demands-to-the-african-development-bank/> (accessed 13 September 2024).
18. See AfDB 'Renewal of the Bank Civil Society Committee 2023-2025' (September 2023) <https://cse.afdb.org/sites/default/files/Documents/Bank-CS%20Committee%20Renewal%20Process%202023%20Final.pdf> (accessed 13 September 2024).
19. Coalition for Human Rights in Development (n 14).
20. Bank Information Centre 'What were the key takeaways from the AfDB's Civil Society Forum?' <https://bankinformationcenter.org/en-us/update/what-were-the-key-takeaways-from-the-afdb-civil-society/> (accessed 13 September 2024).
21. AfDB 'About the CSO Forum' (2022) <https://cse.afdb.org/en/pages/annual-forum/about-2022-annual-forum> (accessed 13 September 2024).
22. AfDB 'Civil Society Forum' <https://www.afdb.org/en/topics-and-sectors/topics/civil-society/civil-society-forum> (accessed 13 September 2024).
23. 'Forgotten promises: Civil society's engagement with the African Development Bank' Business Ghana 25 May 2022 <https://www.businessghana.com/site/news/Business/263365/Forgotten-Promises:-Civil-Society%E2%80%99s-Engagement-with-the-African-Development-Bank-https://rightsindevelopment.org/news/civil-society-groups-demand-more-engagement-on-the-sidelines-of-the-afdb-annual-meetings/> (accessed 13 September 2024).
24. AfDB 'Terms of Reference: Bank-Civil Society Committee 2023-2025' (2023) <https://cse.afdb.org/sites/default/files/Documents/Terms%20of%20Reference%20Renewal%20of%20the%20Bank-CSO%20Committee%202023-2025%20revised%20September%202023.pdf> (accessed 13 September 2024).
25. AfDB (n 18). See also AfDB 'Call for applications for the renewal of the Bank Civil Society Committee 2023-2025' <https://cse.afdb.org/en/pages/news/call-applications-renewal-bank-civil-society-committee-2023-2025> (accessed 13 September 2024).
26. As above.
27. AfDB 'Call for applications for the renewal of the Bank Civil Society Committee 2023-2025' (n 25).
28. AfDB 'African Development Bank announces renewal of Bank-Civil Society Committee' (2024) <https://www.afdb.org/en/news-and-events/african-development-bank-announces-renewal-bank-civil-society-committee-70266> (accessed 13 September 2024).
29. Coalition for Human Rights in Development 'African Development Bank' <https://rightsindevelopment.org/afdb/> (accessed 13 September 2024).
30. Coalition for Human Rights in Development 'Toolkit on Understanding the African Development Bank' (2023) https://rightsindevelopment.org/tools_guides/understanding-the-afdb/ (accessed 13 September 2024).
31. AfDB 'Civil society' <https://www.afdb.org/en/news-keywords/civil-society> (accessed 13 September 2024).
32. AfDB 'Integrating the community perspective into the performance review of Burkina Faso's country portfolio' (2023) <https://cse.afdb.org/pages/news/integrating-community-perspective-performance-review-burkina-fasos-country-portfolio> (accessed 13 September 2024).
33. AfDB 'Lesotho CSOs Shape African Development Bank's New Country Strategy' (2024) <https://www.afdb.org/en/news-and-events/lesotho-csos-shape-african-development-banks-new-country-strategy-70238> (accessed 13 September 2024).
34. AfDB 'African Development Bank mission strengthens civil society collaboration in Ghana' (2024) <https://www.afdb.org/en/news-and-events/press-releases/african-development-bank-mission-strengthens-civil-society-collaboration-ghana-69981> (accessed 13 September 2024).
35. AfDB 'DAI – Frequently asked questions' <https://www.afdb.org/en/disclosure-and-access-to-information/faqs> (accessed 13 September 2024).
36. E Jika & J Medallo 'The African Development Bank must strengthen its information disclosure practices and policies to center communities in the development process' Medium 23 September 2021 <https://accountability.medium.com/the-african-development-bank-must-strengthen-its-information-disclosure-practices-and-policies-to-cdd598b7aea6> (accessed 13 September 2024).
37. AfDB 'Disclosure and Access to Information Policy' (2019) <https://www.afdb.org/en/disclosure-and-access-to-information/dai-policy> (accessed 13 September 2024).

38. Jika & Medallo (n 36).6
39. AfDB 'Report on the Implementation Review of the Disclosure and Access to Information (DAI) Policy 2012-2021' (2022) <https://www.afdb.org/en/documents/report-implementation-review-disclosure-and-access-information-dai-policy-2012-2021> (accessed 13 September 2024).
40. T McIntosh 'AfDB issues positive report on Access to Information Policy, but finds some issues' (2022) <https://eyeonglobaltransparency.net/2022/07/12/afdb-issues-positive-report-on-access-to-information-policy-but-finds-some-issues/> (accessed 13 September 2024).
41. As above.
42. African Development Bank Group 'Evaluation of the AfDB's Integrated Safeguards System – IDEV' (2020) https://idev.afdb.org/sites/default/files/Evaluations/2020-03/Integrated%20Safeguards%20System%20-%20Summary%20report_En_0.pdf (accessed 13 September 2024).
43. Bank Information Centre 'Understanding the African Development Bank: A guide for CSOs and communities' (2023) https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/6fb2dfb3-b0a3-4b21-b9a0-1b7ba96c9117_AfDB_Guide_English.pdf (accessed 13 September 2024).
44. Civil society working group on the AfDB 'African Development Bank review plans leave civil society concerned and disappointed' https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/f6f39ce5-a50f-4270-a30d-51e60a61853c_CS0+statement+on+ISS+review+.pdf (accessed 13 September 2024).
45. Both Ends 'Public Consultation on AfDB Integrated Safeguards System: Joint Submission of comments and recommendations' (May 2022) https://www.bothends.org/uploaded_files/document/220515_Joint_Submission_of_comments_and_recommendations.pdf (accessed 13 September 2024).
46. Coalition for Human Rights in Development (n 29).
47. Gender Action 'IFI's rhetorical gender and climate promises' (2023) <https://www.genderaction.org/pdf/IFIs-Rhetorical-Gender-Climate-Promises.pdf> (accessed 13 September 2024).
48. As above.
49. Both Ends (n 45).
50. As above.
51. Interviews with stakeholders, during May 2024.
52. Independent Recourse Mechanism of the African Development Bank 'Anti-Retaliation Toolkit Addressing Risks of Retaliation in Complaint Management Independent Recourse Mechanism AfDB Group' (2023) <https://irm.afdb.org/en/documents/anti-retaliation-toolkit-en> (accessed 13 September 2024).
53. AfDB Independent Recourse Mechanism 'The IRM facilitates successful resolution of dispute between Malicounda Community and Malicounda Power Company SAS in Senegal' (2023) <https://irm.afdb.org/en/article/irm-facilitates-successful-resolution-dispute-between-malicounda-community-and-malicounda> (accessed 13 September 2024).
54. Coalition for Human Rights in Development 'Accountability Mechanism's report confirms human rights violations in two projects in Uganda' (2024) <https://rightsindevelopment.org/news/a-step-towards-justice-accountability-mechanisms-report-confirms-human-rights-violations-in-two-african-development-bank-projects-in-uganda/> (accessed 13 September 2024).
55. Coalition for Human Rights in Development 'Demystifying Development Finance. How public development banks impact peoples and the planet' (2023) <https://rightsindevelopment.org/pdbs/> (accessed 13 September 2024).
56. AfDB 'The Fragile States Facility' https://www.afdb.org/sites/default/files/documents/publications/fragile_states_unit_brochure.pdf (accessed 13 September 2024).
57. Proparco 'Development Finance Institutions: How to operate in fragile countries' <https://www.proparco.fr/en/article/development-finance-institutions-how-operate-fragile-countries> (accessed 13 September 2024).
58. AfDB 'Bank Group's Strategy for Addressing Fragility and Building Resilience in Africa (2022-2026)' (2022) <https://www.afdb.org/en/documents/bank-groups-strategy-addressing-fragility-and-building-resilience-africa-2022-2026> (accessed 13 September 2024).
59. Bank Information Centre 'How can the AfDB strengthen its engagement with civil society?' <https://bankinformationcenter.org/en-us/update/how-can-the-african-development-bank-strengthen-its/> (accessed 13 September 2024).
60. GE Kumbi 'Evaluation of the African Development Bank's Engagement with Civil Society: Key findings, lessons and recommendations' IDEV and AHGC Knowledge Event 18 July 2022 <https://idev.afdb.org/sites/default/files/documents/files/Girma%20Kumbi%20Presentation.pdf> (accessed 13 September 2024).
61. African Development Bank Group 'Independent Development Evaluation African Development Bank. Evaluation of the AfDB's Engagement with Civil Society: An IDEV Corporate Evaluation: Summary Report' (2021) https://www.afdb.org/sites/default/files/documents/evaluation-reports/engagement_with_civil_society_en_web.pdf (accessed 13 September 2024).
62. Kumbi (n 60).

63. African Development Bank 'Evaluation of Bank's Civil Society Engagement 2012-2019: Roadmap To Civil Society Engagement Strategy 2023-2028' (2022)
https://idev.afdb.org/sites/default/files/documents/files/Luther%20Yam%C3%A9ogo-Roadmap%20to%20CSE%20Strategy%202023-2028_AHGC2_BDEV.pdf (accessed 13 September 2024).
64. Asian Development Bank 'Who we are' <https://www.adb.org/who-we-are> (accessed 13 September 2024).
65. ADB 'Fragile and Conflict-Affected Situations (FCAS) and Small Island Developing States (SIDS)' <https://www.adb.org/what-we-do/topics/fcas-sids/overview> (accessed 13 September 2024).
66. ADB 'Credit fundamentals' (accessed 13 September 2024).
67. ADB 'Funds and resources' <https://www.adb.org/what-we-do/funds/funds-administered-ADB> (accessed 13 September 2024).
68. ADB 'Where we work' <https://www.adb.org/where-we-work> (accessed 13 September 2024).
69. Compiled by author, drawn from the literature review and interviews held with CSOs, Bank officials and project-affected communities (from the ADB, AfDB and IDB) between May-June 2024.
70. ADB 'Strategy 2030: Achieving a prosperous, inclusive, resilient, and sustainable Asia and the Pacific' (2018) <https://www.adb.org/documents/strategy-2030-prosperous-inclusive-resilient-sustainable-asia-pacific> (accessed 13 September 2024).
71. ADB 'Cooperation between Asian Development Bank and Nongovernmental organisations' (1998) <https://www.adb.org/documents/cooperation-between-asian-development-bank-and-nongovernment-organizations> (accessed 13 September 2024).
72. ADB (n 71) 17-18
73. ADB 'Civil Society Participation at the Annual Meeting of the Board of Governors of the Asian Development Bank' (2016) <https://www.adb.org/publications/civil-society-participation-ADB-annual-meeting> (accessed 13 September 2024).
74. As above.
75. Coalition for Human Rights in Development 'Civic Space echoed in the ADB annual meeting' (2024) <https://rightsindevelopment.org/news/adb-annual-meeting-civic-space-georgia/> (accessed 13 September 2024).
76. NGO Forum on ADB 'Collective Civil Society Statement on ESF Draft (to the ADB): Calling for an overhaul and immediate redrafting' (13 May 2024) <https://www.forum-ADB.org/post/forumesfsubmission> (accessed 13 September 2024).
77. Coalition for Human Rights in Development (n 75). /
78. Coalition for Human Rights in Development 'Hey @ADB_HQ, this is the development we want!' X.com 02 May 2024 <https://x.com/RightsinDevt/status/1785963425559949821?t=QVaHIAZKbH00fWCQCYjs-g&s=08> (accessed 13 September 2024).
79. NGO Forum on ADB (n 76).
80. NGO Forum on ADB post X.com 05 May 2024 https://x.com/forum_ADB/status/1787081928555876586 (accessed 13 September 2024).
81. Realty of Aid 'CSO Collective Statement for the 56th ADB Annual Meeting' <https://realityofaid.org/cso-collective-statement-56th-agm/> (accessed 13 September 2024).
82. NGO FORUM on ADB 'Letter of Introduction to the new ADB President' (2020) <https://www.forum-ADB.org/post/letter-of-introduction-to-ADB-pres-masatsugu-asakawa> (accessed 13 September 2024).
83. NGO FORUM on ADB '30 Years of NGO Forum on ADB' <https://youtu.be/i9-vPGREpY> (accessed 13 September 2024).
84. Inclusive Development 'The Asian Development Bank is backing new coal, despite climate pledges' (2024) <https://www.inclusivedevelopment.net/asian-development-bank/the-asian-development-bank-is-backing-new-coal-despite-climate-pledges/> (accessed 13 September 2024).
85. ADB 'Involvement of civil society organizations in Asian Development Bank operations' (2006) <https://www.adb.org/documents/involvement-civil-society-organizations-asian-development-bank-operations> (accessed 13 September 2024).
86. NGO Forum on ADB 'ADB Strategy 2030' <https://www.forum-ADB.org/copy-of-accountability-mechanism> (accessed 13 September 2024).
87. ADB 'Highlights of ADB's engagement with civil society organizations 2023' (2024) <https://www.adb.org/documents/highlights-ADB-engagement-civil-society-organizations-2023> (accessed 13 September 2024).
88. ADB 'Access to Information Policy' (2018) <https://www.adb.org/documents/access-information-policy> (accessed 13 September 2024).
89. Centre for Law and Democracy 'Little progress in Asian Development Bank information policy proposals' (2017) <https://www.law-democracy.org/live/little-progress-in-asian-development-bank-information-policy-proposals/> (accessed 13 September 2024).
90. NGO FORUM on ADB 'Public Information Policy' <https://www.forum-ADB.org/pcp> (accessed 13 September 2024).
91. NGO FORUM on ADB 'Joint Submission of NGO Forum on ADB and Both ENDS. Comments on the 2nd draft of the Public Communications Policy (to be renamed as Access to Information Policy "AIP")' (6 April 2018) https://89860407-3dfc-4c56-ada8-a42a9756a280.usrfiles.com/ugd/898604_3e7dbcd1894146dd96dd89687ac2b03a.pdf (accessed 13 September 2024).

92. NGO FORUM on ADB (n 90).
93. ADB 'Operations Manual' (2023) <https://www.adb.org/documents/operations-manual> (accessed 13 September 2024).
94. Some of the more innovative suggestions from the consultations included the integration of climate change, moving to integrate requirements for free, prior and informed consent of Indigenous people, and a proposal to include a dedicated standard on stakeholder engagement, information disclosure, and grievance redress mechanisms.
95. ADB 'Safeguards' <https://www.adb.org/who-we-are/safeguards> (accessed 13 September 2024).
96. ADB 'Virtual: Civil Society Programme' (2022) <https://www.adb.org/node/806126/printable/print> (accessed 13 September 2024).
97. OHCHR 'Memorandum Comments on the Review and Update of the ADB Safeguard Policy Statement' (2021) https://www.ohchr.org/sites/default/files/Documents/Issues/Development/DFI/ADB_SPS_29April2021.pdf (accessed 13 September 2024).
98. NGO Forum on ADB (n 76). n
99. 'NGO Forum network and allies demand accountability from the Asian Development Bank amid Georgia's civic space crisis' EIN Press Wire 4 May 2024 <https://www.8newsnow.com/business/press-releases/ein-presswire/708861228/ngo-forum-network-and-allies-demand-accountability-from-the-asian-development-bank-amid-georgias-civic-space-crisis/> (accessed 13 September 2024).
100. NGO Forum on ADB (n 76).
101. As above.
102. Gender Action (n 47).
103. As above.
104. As above.
105. Oxfam Australia 'Safeguarding or disregarding? Community experiences with the Asian Development Bank's Safeguard Policies' (2007) <https://www.oxfam.org.au/wp-content/uploads/2011/08/OAus-SafeguardingADBPolicies-0107.pdf> (accessed 13 September 2024).
106. ADB 'Accountability Mechanism' <https://www.adb.org/who-we-are/accountability-mechanism/compliance-review-function> (accessed 13 September 2024).
107. Accountability Counsel 'Asian Development Bank' <https://www.accountabilitycounsel.org/institution/asian-development-bank/#our-advocacy> (accessed 13 September 2024).
108. J Yumnam 'ADB-financed Imphal Town Ring Road and violations of rights' Imphal Free Press 25 September 2021 <https://www.ifp.co.in/analysis/adb-financed-imphal-town-ring-road-and-violations-of-rights> (accessed 13 September 2024).
109. Accountability Counsel 'Reforms needed at the ADB's Accountability Mechanism' (2023) <https://www.accountabilitycounsel.org/wp-content/uploads/0612023-reforms-needed-at-the-adbs-accountability-mechanism.pdf> (accessed 13 September 2024).
110. NGO Forum on ADB 'NGO Forum on ADB Comments: Safeguard Compliance and Accountability Mechanism Framework' (2019) <https://www.forum-adb.org/post/ngo-forum-on-adb-comments-safeguard-compliance-and-accountability-mechanism-framework> (accessed 13 September 2024).
111. NGO Forum on ADB 'Does ADBs accountability mechanism work?' (2019) <https://www.forum-adb.org/post/does-adb-s-accountability-mechanism-work> (accessed 13 September 2024).
112. ADB 'ADB's cooperation with civil society' <https://www.adb.org/who-we-are/ngos/overview> (accessed 13 September 2024).
113. ADB 'How does ADB engage civil society organisations in its operations? Findings of an exploratory inquiry in South Africa' (2015) <https://www.adb.org/publications/how-does-adb-engage-civil-society-organizations-its-operations> (accessed 13 September 2024).
114. As above.
115. As above.
116. G Forster 'Do DFIs engage with local communities? - An interview with Rayyan Hassan' (2021) <https://www.publishwhatyoufund.org/2021/02/do-dfis-engage-with-local-communities-an-interview-with-rayyan-hassan/> (accessed 13 September 2024).
117. ADB (n 113).
118. As above.
119. ADB 'Highlights of ADB's Cooperation with Civil Society Organisations 2021: Celebrating 20 years of the NGO and Civil Society Center' (September 2022) <https://www.adb.org/sites/default/files/institutional-document/827811/highlights-adb-cooperation-civil-society-2021.pdf> (accessed 13 September 2024).
120. Partnership for Transparency 'Deepening civil society engagement for development effectiveness' (2017) <https://ptfund.org/deepening-civil-society-engagement-for-development-effectiveness/> (accessed 13 September 2024).
121. ADB 'Working together for development results: Lessons from ADB and Civil Society Organization engagement in South Asia' (2022) https://www.adb.org/sites/default/files/publication/844421/lessons-adb-cso-engagement-south-asia_0.pdf (accessed 13 September 2024).
122. ADB 'ADB Cooperation with Civil Society Annual Reports' <https://www.adb.org/documents/series/adb-cooperation-with-civil-society-annual-reports> (accessed 13 September 2024).

123. ADB (n 93).
124. ADB 'Highlights of ADB's cooperation with civil society organizations 2022' (2022)https://www.adb.org/sites/default/files/institutional-document/879416_-adb-cooperation-civil-society-2022.pdf (accessed 13 September 2024).
125. As above.
126. IDB 'IDB Strategy+' <https://www.iadb.org/en/who-we-are/institutional-strategy> (accessed 13 September 2024).
127. IDB 'Capital stock and voting power' <https://www.iadb.org/en/who-we-are/how-we-are-organized/board-governors/capital-stock-and-voting-power> (accessed 13 September 2024).
128. IDB (n 126).
129. Bank Information Centre 'How can the IDB develop a new Institutional Strategy that prioritizes people and the planet?' (2023) <https://bankinformationcenter.org/en-us/update/how-can-the-idb-develop-a-new-institutional-strategy/> (accessed 13 September 2024).
130. Compiled by author, drawn from the literature review and interviews held with CSOs, Bank officials and project-affected communities (from the ADB, AfDB and IDB) between May-June 2024.
131. As above.
132. IDB 'IDB Group-Civil Society Engagement Strategy' <https://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=EZSHARE-581988153-23> (accessed 13 September 2024).
133. F Milano & V Espinoza 'IDB Group-Civil Society: Engagement Review 2016-2017' (June 2018) <https://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=EZSHARE-2116190867-64> (accessed 13 September 2024).
134. IDB 'Action Plan for Implementation of the IDB Group-Civil Society Engagement Strategy for Operations and Initiatives' <https://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=EZSHARE-2116190867-64> (accessed 13 September 2024).
135. IDB 'Civil society team' <https://www.iadb.org/en/how-we-can-work-together/civil-society/civil-society-team> (accessed 13 September 2024).
136. Bank Information Centre 'Forming coalitions to advocate for bank reforms' https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/0f63d77e-db0f-4f13-b99f-1cab98412189_Forming+coalitions+to+advocate+for+bank+reforms.docx.pdf (accessed 13 September 2024).
137. Bank Information Centre 'What to expect from IDB's leadership' (2022) <https://bankinformationcenter.org/en-us/update/what-to-expect-from-idbs-leadership/> (accessed 13 September 2024).
138. Bank Information Centre 'What should the next IDB President prioritize?' (2020) <https://bankinformationcenter.org/en-us/update/the-election-of-the-next-inter-american-development/> (accessed 13 September 2024).
139. Bank Information Centre 'What should Mr Goldfajn prioritize as the new leader of the Inter-American Development Bank?' (2022) <https://bankinformationcenter.org/en-us/update/ilan-goldfajn-has-been-elected-as-the-new-idb-president/> (accessed 13 September 2024).
140. Coalition for Human Rights in Development 'Civil society representatives make their voices heard at the IDB group annual meetings' (2024) <https://rightsindevelopment.org/news/civil-society-representatives-makes-their-voices-heard-at-idb-group-2024-annual-meetings/> (accessed 13 September 2024).
141. Bank Information Centre (n 136).
142. As above.
143. As above.
144. International Rivers 'Civil Society Organizations continue to call for more effective consultation processes from the Inter-American Development Bank' (2023) <https://www.internationalrivers.org/news/civil-society-organizations-continue-to-call-for-more-effective-consultation-processes-from-the-inter-american-development-bank%E2%82%AC%80%BF%BC/> (accessed 13 September 2024).
145. IDB (n 134).
146. Bank Information Centre 'IDB Policy Review overlooks the most important barrier to access to information' (2020) <https://bankinformationcenter.org/en-us/update/idb-policy-review-overlooks-the-most-important-barrier/> (accessed 13 September 2024).
147. As above.
148. Coalition for Human Rights in Development 'Recommendations and Comments from Civil Society on the draft Access to Information Policy' <https://rightsindevelopment.org/news/civil-society-organizations-make-recommendations-to-the-draft-of-the-inter-american-development-banks-access-to-information-policy/> (accessed 13 September 2024).
149. International Rivers (n 144).
150. Bank Information Centre 'Why were IDB consultations on the Environmental and Social Policy Framework neither inclusive, nor meaningful, nor effective?' (2020) <https://bankinformationcenter.org/en-us/update/idb-consultations-on-the-environmental-and-social-policy/> (accessed 13 September 2024).
151. Accountability Counsel 'CSO's Recommendations & Comments on the IDB Environmental & Social Policy Framework – 2nd Draft' (2020) <https://www.accountabilitycounsel.org/wp-content/uploads/2020/11/8-2020-csos-recommendations-on-idb-espf-2nd-draft.pdf> (accessed 13 September 2024).
152. Banking Information Centre (n 136).

153. CEPAL 'Authorities and experts highlight the Escazú Agreement's Importance for guaranteeing human rights in Latin America and the Caribbean' (2020) <https://www.cepal.org/en/pressreleases/authorities-and-experts-highlight-escazu-agreements-importance-guaranteeing-human> (accessed 13 September 2023).
154. Bank Information Centre 'How can the IDB Group effectively implement its commitment not to tolerate reprisals in its projects and operations?' (2022) <https://bankinformationcenter.org/en-us/update/how-can-the-idb-group-effectively-implement-its-commitment/> (accessed 13 September 2024).
155. As above.
156. Bank Information Centre 'What are the main weaknesses of the IDB Invest's new Environmental and Social Sustainability Policy?' (2020) https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/8865bf7d-4755-4811-ac72-e3989de4c09c_1.+Sustainability_Policy-English.pdf (accessed 13 September 2024).
157. Bank Information Centre 'What needs to happen at the IDB to fully implement its new Environmental and Social Policy Framework?' (2022) <https://bankinformationcenter.org/en-us/update/the-idb-approved-its-environmental-and-social-policy/> (accessed 13 September 2024).
158. Gender Action (n 47).
159. As above.
160. IADB 'What is MICI?' <https://mici.iadb.org/en/what-mici> (accessed 13 September 2024).
161. Coalition for Human Rights in Development (n 140).
162. These submissions can be found at Accountability Counsel 'Inter-American Development Bank (IDB) | Independent Consultation and Investigation Mechanism (MICI)' <https://accountabilitycounsel.org/institution/inter-american-development-bank/#documents> (accessed 13 September 2024).
163. Accountability Counsel 'Comments on the Draft Guidelines for the Consultation Phase and the Draft Terms of Reference for the Roster of Process Facilitation Experts' (22 March 2018) <https://www.accountabilitycounsel.org/wp-content/uploads/2019/02/3-22-2018-comments-on-draft-guidelines-and-tors-final.pdf> (accessed 13 September 2024).
164. IDB Office of Oversight and Evaluation 'Evaluation of the Independent Consultation and Investigation Mechanism (MICI)' (2021) <https://publications.iadb.org/publications/english/document/Evaluation-of-the-Independent-Consultation-and-Investigation-Mechanism-MICI-2021.pdf> (accessed 13 September 2024).
165. Bank Information Centre 'Will the IDB's new environmental and social policies protect people and the planet?' (2020) <https://bankinformationcenter.org/en-us/update/will-idbs-new-environmental--social-policies-protect/> (accessed 13 September 2024).
166. Bank Information Centre (n 154).
167. United Nations 'Guiding Principles on Business and Human Rights' (2011) https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf (accessed 13 September 2024).
168. Bank Information Centre (n 165).
169. AIDA 'Indigenous victory as Development Bank withdraws investment and drafts exit plan following rights violation in Guatemala' (March 2022) <https://aida-americas.org/en/press/indigenous-victory-as-development-bank-withdraws-investment-and-drafts-exit-plan> (accessed 13 September 2024). Coalition for Human Rights in Development 'Wearing blinders: How banks are ignoring reprisal risks' (2023) <https://rightsindevelopment.org/wearing-blinders/> (accessed 13 September 2024).
170. Milano & Espinoza (n 133).
171. IDB 'IDB Group-Civil Society Engagement Review 2016-2017' (2018) <https://webimages.iadb.org/publications/english/document/IDB-Group-Civil-Society-Engagement-Review-2016-2017.pdf> (accessed 13 September 2024).
172. Jika & Medallo (n 36).
173. Office of the United Nations High Commissioner for Human Rights (OHCHR) 'Remedy in development finance: Guidance and practice' (2022) <https://www.ohchr.org/sites/default/files/2022-03/Remedy-in-Development.pdf> (accessed 13 September 2024).
174. L Clarke 'Supreme Court rejects World Bank coal case' E&E News 25 April 2022 <https://www.eenews.net/articles/supreme-court-rejects-world-bank-coal-case/> (accessed 13 September 2024).



References

- Accountability Counsel 'Asian Development Bank' <https://www.accountabilitycounsel.org/institution/asian-development-bank/#our-advocacy> (accessed 13 September 2024)
- Accountability Counsel 'Comments on the Draft Guidelines for the Consultation Phase and the Draft Terms of Reference for the Roster of Process Facilitation Experts' (22 March 2018) <https://www.accountabilitycounsel.org/wp-content/uploads/2019/02/3-22-2018-comments-on-draft-guidelines-and-tors-final.pdf> (accessed 13 September 2024)
- Accountability Counsel 'CSO's Recommendations & Comments on the IDB Environmental & Social Policy Framework – 2nd Draft' (2020) <https://www.accountabilitycounsel.org/wp-content/uploads/2020/11/8-2020-csos-recommendations-on-idb-espf-2nd-draft.pdf> (accessed 13 September 2024)
- Accountability Counsel 'Inter-American Development Bank (IDB) | Independent Consultation and Investigation Mechanism (MICI)' <https://accountabilitycounsel.org/institution/inter-american-development-bank/#documents> (accessed 13 September 2024)
- Accountability Counsel 'Reforms needed at the ADB's Accountability Mechanism' (2023) <https://www.accountabilitycounsel.org/wp-content/uploads/0612023-reforms-needed-at-the-adbs-accountability-mechanism.pdf> (accessed 13 September 2024)
- ADB 'Access to Information Policy' (2018) <https://www.adb.org/documents/access-information-policy> (accessed 13 September 2024)
- ADB 'Accountability Mechanism' <https://www.adb.org/who-we-are/accountability-mechanism/compliance-review-function> (accessed 13 September 2024)
- ADB 'ADB's cooperation with civil society' <https://www.adb.org/who-we-are/ngos/overview> (accessed 13 September 2024)
- ADB 'ADB Cooperation with Civil Society Annual Reports' <https://www.adb.org/documents/series/adb-cooperation-with-civil-society-annual-reports> (accessed 13 September 2024)
- ADB 'Civil society participation at the Annual Meeting of the Board of Governors of the Asian Development Bank' (2016) <https://www.adb.org/publications/civil-society-participation-adb-annual-meeting> (accessed 13 September 2024)

- ADB 'Cooperation between Asian Development Bank and nongovernmental organisations' (1998) <https://www.adb.org/documents/cooperation-between-asian-development-bank-and-nongovernment-organisations> (accessed 13 September 2024)
- ADB 'Credit fundamentals' <https://www.adb.org/work-with-us/investors/credit-fundamentals> (accessed 13 September 2024)
- ADB 'Fragile and Conflict-Affected Situations (FCAS) and Small Island Developing States (SIDS)' <https://www.adb.org/what-we-do/topics/fcas-sids/overview> (accessed 13 September 2024)
- ADB 'Funds and resources' <https://www.adb.org/what-we-do/funds/funds-administered-ADB> (accessed 13 September 2024)
- ADB 'Highlights of ADB's Cooperation with Civil Society Organisations 2021: Celebrating 20 years of the NGO and Civil Society Center' (September 2022) <https://www.adb.org/sites/default/files/institutional-document/827811/highlights-ADB-cooperation-civil-society-2021.pdf> (accessed 13 September 2024)
- ADB 'Highlights of ADB's Cooperation with Civil Society organisations 2022' (2022) <https://www.adb.org/sites/default/files/institutional-document/879416-ADB-cooperation-civil-society-2022.pdf> (accessed 13 September 2024)
- ADB 'Highlights of ADB's Engagement with Civil Society organisations 2023' (2024) <https://www.adb.org/documents/highlights-ADB-engagement-civil-society-organisations-2023> (accessed 13 September 2024)
- ADB 'How does ADB engage civil society organisations in its operations? Findings of an exploratory inquiry in South Africa' (2015) <https://www.adb.org/publications/how-does-ADB-engage-civil-society-organisations-its-operations> (accessed 13 September 2024)
- ADB 'Involvement of Civil Society organisations in Asian Development Bank Operations' (2006) <https://www.adb.org/documents/involvement-civil-society-organisations-Asian-development-bank-operations> (accessed 13 September 2024)
- ADB 'Operations Manual' (2023) <https://www.adb.org/documents/operations-manual> (accessed 13 September 2024)
- ADB 'Safeguards' <https://www.adb.org/who-we-are/safeguards> (accessed 13 September 2024)
- ADB 'Strategy 2030: Achieving a prosperous, inclusive, resilient, and sustainable Asia and the Pacific' (2018) <https://www.adb.org/documents/strategy-2030-prosperous-inclusive-resilient-sustainable-Asia-Pacific> (accessed 13 September 2024)
- ADB 'Virtual: Civil Society Programme' (2022) <https://www.adb.org/node/806126/printable/print> (accessed 13 September 2024)
- ADB 'Where we work' <https://www.adb.org/where-we-work> (accessed 13 September 2024)
- ADB 'Working together for development results: Lessons from ADB and Civil Society organisation engagement in South Asia' (2022) https://www.adb.org/sites/default/files/publication/844421/lessons-ADB-cso-engagement-south-Asia_0.pdf (accessed 13 September 2024)
- AfDB 'About the CSO forum' (2022) <https://cse.afdb.org/en/pages/annual-forum/about-2022-annual-forum> (accessed 13 September 2024)
- AfDB 'African Development Bank announces renewal of Bank-Civil Society Committee' (2024) <https://www.afdb.org/en/news-and-events/african-development-bank-announces-renewal-bank-civil-society-committee-70266> (accessed 13 September 2024)
- AfDB 'African Development Bank mission strengthens civil society collaboration in Ghana' (2024) <https://www.afdb.org/en/news-and-events/press-releases/african-development-bank-mission-strengthens-civil-society-collaboration-ghana-69981> (accessed 13 September 2024)
- AfDB 'Bank Group's Strategy for Addressing Fragility and Building Resilience in Africa (2022-2026)' (2022) <https://www.afdb.org/en/documents/bank-groups-strategy-addressing-fragility-and-building-resilience-africa-2022-2026> (accessed 13 September 2024)

- AfDB 'Call for applications for the renewal of the Bank Civil Society Committee 2023-2025' <https://cse.afdb.org/en/pages/news/call-applications-renewal-bank-civil-society-committee-2023-2025> (accessed 13 September 2024)
- AfDB 'Civil society' <https://www.afdb.org/en/news-keywords/civil-society> (accessed 13 September 2024)
- AfDB 'Civil Society Engagement' <https://www.afdb.org/en/topics-and-sectors/topics/civil-society/civil-society-engagement> (accessed 13 September 2024)
- AfDB 'Civil Society Forum' <https://www.afdb.org/en/topics-and-sectors/topics/civil-society/civil-society-forum> (accessed 13 September 2024)
- AfDB 'Civil Society Virtual Forum: Engaging civil society in building Africa back better after COVID-19 – General Report 26-27 November 2020' (2020) https://www.afdb.org/sites/default/files/2021/03/26/report_civil_society_virtual_forum_2020.pdf (accessed 13 September 2024)
- AfDB 'Cooperation with Civil Society organisations: Policy and Guidelines' (October 1999) <https://www.afdb.org/fileadmin/uploads/afdb/Documents/Policy-Documents/10000024-en-cooperation-with-civil-society-organisations-policy-and-guidelines.pdf> (accessed 13 September 2024)
- AfDB 'DAI – Frequently Asked Questions' <https://www.afdb.org/en/disclosure-and-access-to-information/faqs> (accessed 13 September 2024)
- AfDB 'Disclosure and Access to Information Policy' (2019) <https://www.afdb.org/en/disclosure-and-access-to-information/dai-policy> (accessed 13 September 2024)
- AfDB 'Evaluation of Bank's Civil Society Engagement 2012-2019: Roadmap to Civil Society Engagement Strategy 2023-2028' (2022) https://idev.afdb.org/sites/default/files/documents/files/Luther%20Yam%C3%A9ogo-Roadmap%20to%20CSE%20Strategy%202023-2028_AHGC2_BDEV.pdf (accessed 13 September 2024)
- AfDB 'Integrating the community perspective into the performance review of Burkina Faso's country portfolio' (2023) <https://cse.afdb.org/pages/news/integrating-community-perspective-performance-review-burkina-fasos-country-portfolio> (accessed 13 September 2024)
- AfDB 'Framework for Enhanced Engagement with Civil Society Organisations' (2012) https://www.afdb.org/fileadmin/uploads/afdb/Documents/Policy-Documents/Framework_for_Enhanced_Engagement_with_Civil_Society_organisations-06_2015.pdf (accessed 13 September 2024)
- AfDB 'Lesotho CSOs Shape African Development Bank's New Country Strategy' (2024) <https://www.afdb.org/en/news-and-events/lesotho-csos-shape-african-development-banks-new-country-strategy-70238> (accessed 13 September 2024)
- AfDB 'Renewal of the Bank Civil Society Committee 2023-2025' (September 2023) <https://cse.afdb.org/sites/default/files/Documents/Bank-CS%20Committee%20Renewal%20Process%202023%20Final.pdf> (accessed 13 September 2024)
- AfDB 'Report on the Implementation Review of the Disclosure and Access to Information (DAI) Policy 2012-2021' (2022) <https://www.afdb.org/en/documents/report-implementation-review-disclosure-and-access-information-dai-policy-2012-2021> (accessed 13 September 2024)
- AfDB 'Statement of subscription and voting powers as at 31 August 2023' (2023) <https://www.afdb.org/en/documents/afdb-statement-subscription-and-voting-powers-31-august-2023> (accessed 13 September 2024)
- AfDB 'Terms of Reference: Bank-Civil Society Committee 2023-2025' (2023) <https://cse.afdb.org/sites/default/files/Documents/Terms%20of%20Reference%20Renewal%20of%20the%20Bank-CSO%20Committee%202023-2025%20revised%20September%202023.pdf> (accessed 13 September 2024)

- AfDB 'The Fragile States Facility' https://www.afdb.org/sites/default/files/documents/publications/fragile_states_unit_brochure.pdf (accessed 13 September 2024)
- African Development Bank Group 'Evaluation of the AfDB's Integrated Safeguards System – IDEV' (2020) https://idev.afdb.org/sites/default/files/Evaluations/2020-03/Integrated%20Safeguards%20System%20-%20Summary%20report_En_0.pdf (accessed 13 September 2024)
- African Development Bank Group 'Independent Development Evaluation African Development Bank. Evaluation of the AfDB's Engagement with Civil Society: An IDEV Corporate Evaluation: Summary Report' (2021) https://www.afdb.org/sites/default/files/documents/evaluation-reports/engagement_with_civil_society_en_web.pdf (accessed 13 September 2024)
- AfDB Independent Recourse Mechanism 'The IRM Facilitates Successful Resolution of Dispute Between Malicounda Community and Malicounda Power Company SAS in Senegal' (2023) <https://irm.afdb.org/en/article/irm-facilitates-successful-resolution-dispute-between-malicounda-community-and-malicounda> (accessed 13 September 2024)
- AIDA 'Indigenous victory as Development Bank withdraws investment and drafts exit plan following rights violation in Guatemala' (March 2022) <https://aida-americas.org/en/press/indigenous-victory-as-development-bank-withdraws-investment-and-drafts-exit-plan> (accessed 13 September 2024)
- Asian Development Bank 'Who we are' <https://www.adb.org/who-we-are> (accessed 13 September 2024)
- Bank Information Centre 'Forming coalitions to advocate for bank reforms' https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/0f63d77e-db0f-4f13-b99f-1cab98412189_Forming+coalitions+to+advocate+for+bank+reforms.docx.pdf (accessed 13 September 2024)
- Bank Information Centre 'How can the AfDB strengthen its engagement with civil society?' <https://bankinformationcenter.org/en-us/update/how-can-the-african-development-bank-strengthen-its/> (accessed 13 September 2024)
- Bank Information Centre 'How can the IDB develop a new Institutional Strategy that prioritizes people and the planet?' (2023) <https://bankinformationcenter.org/en-us/update/how-can-the-idb-develop-a-new-institutional-strategy/> (accessed 13 September 2024)
- Bank Information Centre 'How can the IDB Group effectively implement its commitment not to tolerate reprisals in its projects and operations?' (2022) <https://bankinformationcenter.org/en-us/update/how-can-the-idb-group-effectively-implement-its-commitment/> (accessed 13 September 2024)
- Bank Information Centre 'IDB Policy Review overlooks the most important barrier to access to information' (2020) <https://bankinformationcenter.org/en-us/update/idb-policy-review-overlooks-the-most-important-barrier/> (accessed 13 September 2024)
- Bank Information Centre 'Understanding the African Development Bank: A Guide for CSOs and Communities' (2023) https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/6fb2dfb3-b0a3-4b21-b9a0-1b7ba96c9117_AfDB_Guide_English.pdf (accessed 13 September 2024)
- Bank Information Centre 'What are the main weaknesses of the IDB Invest's new Environmental and Social Sustainability Policy?' (2020) https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/8865bf7d-4755-4811-ac72-e3989de4c09c_1.+Sustainability_Policy-English.pdf (accessed 13 September 2024)
- Bank Information Centre 'What should Mr Goldfajn prioritize as the new leader of the Inter-American Development Bank?' (2022) <https://bankinformationcenter.org/en-us/update/ilan-goldfajn-has-been-elected-as-the-new-idb-president/> (accessed 13 September 2024)

- Bank Information Centre 'What needs to happen at the IDB to fully implement its new Environmental and Social Policy Framework?' (2022) <https://bankinformationcenter.org/en-us/update/the-idb-approved-its-environmental-and-social-policy/> (accessed 13 September 2024)
- Bank Information Centre 'What should the next IDB President prioritize?' (2020) <https://bankinformationcenter.org/en-us/update/the-election-of-the-next-inter-american-development/> (accessed 13 September 2024)
- Bank Information Centre 'What to expect from IDB's leadership' (2022) <https://bankinformationcenter.org/en-us/update/what-to-expect-from-idbs-leadership/> (accessed 13 September 2024)
- Bank Information Centre 'What were the key takeaways from the AfDB's Civil Society Forum?' <https://bankinformationcenter.org/en-us/update/what-were-the-key-takeaways-from-the-afdb-civil-society/> (accessed 13 September 2024)
- Bank Information Centre 'Why were IDB consultations on the Environmental and Social Policy Framework neither inclusive, nor meaningful, nor effective?' (2020) <https://bankinformationcenter.org/en-us/update/idb-consultations-on-the-environmental-and-social-policy/> (accessed 13 September 2024)
- Bank Information Centre 'Will the IDB's new Environmental and Social Policies protect people and the planet?' (2020) <https://bankinformationcenter.org/en-us/update/will-idbs-new-environmental-social-policies-protect/> (accessed 13 September 2024)
- Both Ends 'Public Consultation on AfDB Integrated Safeguards System Joint Submission of comments and recommendations' (May 2022) https://www.bothends.org/uploaded_files/document/220515_Joint_Submission_of_comments_and_recommendations.pdf (accessed 13 September 2024)
- Centre for Law and Democracy 'Little progress in Asian Development Bank Information Policy Proposals' (2017) <https://www.law-democracy.org/live/little-progress-in-asian-development-bank-information-policy-proposals/> (accessed 13 September 2024)
- CEPAL 'Authorities and experts highlight the Escazú Agreement's importance for guaranteeing human rights in Latin America and the Caribbean' (2020) <https://www.cepal.org/en/pressreleases/authorities-and-experts-highlight-escazu-agreements-importance-guaranteeing-human> (accessed 13 September 2023)
- Civil Society Working Group on the AfDB 'African Development Bank Review plans leave civil society concerned and disappointed' https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/f6f39ce5-a50f-4270-a30d-51e60a61853c_CS0+statement+on+ISS+review+.pdf (accessed 13 September 2024)
- Clarke, L 'Supreme Court rejects World Bank coal case' E&E News 25 April 2022 <https://www.eenews.net/articles/supreme-court-rejects-world-bank-coal-case/> (accessed 13 September 2024)
- Coalition for Human Rights in Development 'Accountability Mechanism's report confirms human rights violations in two projects in Uganda' (2024) <https://rightsindevelopment.org/news/a-step-towards-justice-accountability-mechanisms-report-confirms-human-rights-violations-in-two-african-development-bank-projects-in-uganda/> (accessed 13 September 2024)
- Coalition for Human Rights in Development 'African CSOs urge AfDB to strengthen civil society engagement' (2016) <https://rightsindevelopment.org/news/african-csos-urge-afdb-to-strengthen-civil-society-engagement/> (accessed 13 September 2024)
- Coalition for Human Rights in Development 'African Development Bank' <https://rightsindevelopment.org/afdb/> (accessed 13 September 2024)

- Coalition for Human Rights in Development 'Civic Space echoed in the ADB annual meeting' (2024) <https://rightsindevelopment.org/news/adb-annual-meeting-civic-space-georgia/> (accessed 13 September 2024)
- Coalition for Human Rights in Development 'Civil society groups expelled from AfDB annual meetings' (2024) <https://rightsindevelopment.org/news/afdbam2024-civil-society-expelled/> (accessed 13 September 2024)
- Coalition for Human Rights in Development 'Civil Society's key demands to the African Development Bank' (2024) <https://rightsindevelopment.org/news/civil-societys-key-demands-to-the-african-development-bank/> (accessed 13 September 2024)
- Coalition for Human Rights in Development 'Civil society representatives make their voices heard at the IDB group annual meetings' (2024) <https://rightsindevelopment.org/news/civil-society-representatives-makes-their-voices-heard-at-idb-group-2024-annual-meetings/> (accessed 13 September 2024)
- Coalition for Human Rights in Development 'Demystifying Development Finance. How public development banks impact peoples and the planet' (2023) <https://rightsindevelopment.org/pdbs/> (accessed 13 September 2024)
- Coalition for Human Rights in Development 'Hey @ADB_HQ, this is the development we want!' X.com 02 May 2024 <https://x.com/RightsinDev/status/1785963425559949821?t=QVaHIAZKbH00fWCQCYjs-g&s=08> (accessed 13 September 2024)
- Coalition for Human Rights in Development 'Joint Statement: AfDB should open space for civil society and communities' (2023) <https://rightsindevelopment.org/news/joint-statement-afdb-should-open-spaces-for-civil-society-and-communities/> (accessed 13 September 2024)
- Coalition for Human Rights in Development 'Press Release: CSOs urge AfDB to promote the interests of ordinary Africans over mega investors at its Annual Meetings' (2018) <https://rightsindevelopment.org/news/press-release-csos-urge-afdb-to-promote-the-interests-of-ordinary-africans-over-mega-investors-at-its-annual-meetings/> (accessed 13 September 2024)
- Coalition for Human Rights in Development 'Recommendations and Comments from Civil Society on the draft Access to Information Policy' <https://rightsindevelopment.org/news/civil-society-organisations-make-recommendations-to-the-draft-of-the-inter-american-development-banks-access-to-information-policy/> (accessed 13 September 2024)
- Coalition for Human Rights in Development 'The importance of creating space for meaningful civil society engagement at the 2024 AfDB annual meetings' (2024) <https://rightsindevelopment.org/news/the-importance-of-creating-space-for-meaningful-civil-society-engagement-at-the-2024-afdb-annual-meetings/> (accessed 13 September 2024)
- Coalition for Human Rights in Development 'Toolkit on Understanding the African Development Bank' (2023) https://rightsindevelopment.org/tools_guides/understanding-the-afdb/ (accessed 13 September 2024)
- Coalition for Human Rights in Development 'Wearing Blinders: How banks are ignoring reprisal risks' (2023) <https://rightsindevelopment.org/wearing-blinders/> (accessed 13 september 2024)
- CSO Working Group on the African Development Bank, with contributions from certain members of the Coalition for Human Rights in Development: Accountability Counsel 'Understanding the African Development Bank: A Guide for Civil Society organisations and Communities' (April 2023) https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/6fb2dfb3-b0a3-4b21-b9a0-1b7ba96c9117_AfDB_Guide_English.pdf (accessed 13 September 2024)

- Finance in Common 'Why Finance in Common?' [https://financeincommon.org/why-finance-in-common#:~:text=Public%20Development%20Banks%20\(PDBs\)%20are,by%20central%20or%20local%20governments](https://financeincommon.org/why-finance-in-common#:~:text=Public%20Development%20Banks%20(PDBs)%20are,by%20central%20or%20local%20governments) (accessed 13 September 2024)
- 'Forgotten promises: Civil society's engagement with the African Development Bank' Business Ghana 25 May 2022 <https://www.businessghana.com/site/news/Business/263365/Forgotten-Promises-Civil-Society%E2%80%99s-Engagement-with-the-African-Development-Bank-https://rightsindvelopment.org/news/civil-society-groups-demand-more-engagement-on-the-sidelines-of-the-afdb-annual-meetings/> (accessed 13 September 2024)
- Forster, G 'Do DFIs engage with local communities? – An interview with Rayyan Hassan' (2021) <https://www.publishwhatyoufund.org/2021/02/do-dfis-engage-with-local-communities-an-interview-with-rayyan-hassan/> (accessed 13 September 2024)
- Gender Action 'IFI's rhetorical gender and climate promises' (2023) <https://www.genderaction.org/pdf/IFIs-Rhetorical-Gender-Climate-Promises.pdf> (accessed 13 September 2024)
- IDB 'Action Plan for Implementation of the IDB Group-Civil Society Engagement Strategy for Operations and Initiatives' <https://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=EZSHARE-2116190867-64> (accessed 13 September 2024)
- IDB 'Capital stock and voting power'
- (accessed 13 September 2024)
- IDB 'Civil society team' <https://www.iadb.org/en/how-we-can-work-together/civil-society/civil-society-team> (accessed 13 September 2024)
- IDB 'IDB Group-Civil Society Engagement Review 2016-2017' (2018) <https://webimages.iadb.org/publications/english/document/IDB-Group-Civil-Society-Engagement-Review-2016-2017.pdf> (accessed 13 September 2024)
- IDB 'IDB Group-Civil Society Engagement Strategy' <https://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=EZSHARE-581988153-23> (accessed 13 September 2024)
- IDB 'IDB Strategy+' <https://www.iadb.org/en/who-we-are/institutional-strategy> (accessed 13 September 2024)
- IDB 'What is MICI?' <https://mici.iadb.org/en/what-mici> (accessed 13 September 2024)
- IDB Office of Oversight and Evaluation 'Evaluation of the Independent Consultation and Investigation Mechanism (MICI)' (2021) <https://publications.iadb.org/publications/english/document/Evaluation-of-the-Independent-Consultation-and-Investigation-Mechanism-MICI-2021.pdf> (accessed 13 September 2024)
- IFI Working Group 'How can the AfDB better engage with civil society at its annual meetings?' (2024) <https://ifiworkinggroup.org/blog/how-can-the-afdb-better-engage-with-civil-society-> (accessed 13 September 2024)
- Inclusive Development 'The Asian Development Bank is backing new coal, despite climate pledges' (2024) <https://www.inclusivedevelopment.net/asian-development-bank/the-asian-development-bank-is-backing-new-coal-despite-climate-pledges/> (accessed 13 September 2024)
- Independent Recourse Mechanism of the African Development Bank 'Anti-Retaliation Toolkit Addressing Risks of Retaliation in Complaint Management Independent Recourse Mechanism AfDB Group' (2023) <https://irm.afdb.org/en/documents/anti-retaliation-toolkit-en> (accessed 13 September 2024)
- International Rivers 'Civil society organisations continue to call for more effective consultation processes from the Inter-American Development Bank' (2023) <https://www.internationalrivers.org/news/civil-society-organisations-continue-to-call-for-more-effective-consultation-processes-from-the-inter-american-development-bank%E2%80%99> (accessed 13 September 2024)

- Jika, E & Medallo, J 'The African Development Bank must strengthen its information disclosure practices and policies to center communities in the development process' Medium 23 September 2021 <https://accountability.medium.com/the-african-development-bank-must-strengthen-its-information-disclosure-practices-and-policies-to-cdd598b7aea6> (accessed 13 September 2024)
- Kumbi, GE 'Evaluation of the African Development Bank's Engagement with Civil Society: Key findings, lessons and recommendations' IDEV and AHGC Knowledge Event 18 July 2022 <https://idev.afdb.org/sites/default/files/documents/files/Girma%20Kumbi%20Presentation.pfd> (accessed 13 September 2024)
- McIntosh, T 'AfDB issues positive report on Access to Information Policy, but finds some issues' (2022) <https://eyeonglobaltransparency.net/2022/07/12/afdb-issues-positive-report-on-access-to-information-policy-but-finds-some-issues/> (accessed 13 September 2024)
- Milano, F & Espinoza, V 'IDB Group-Civil Society: Engagement Review 2016-2017' (June 2018) <https://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=EZSHARE-2116190867-64> (accessed 13 September 2024)
- NGO Forum on ADB '30 Years of NGO Forum on ADB' <https://youtu.be/i9-vPGREFpY> (accessed 13 September 2024)
- NGO Forum on ADB 'ADB Strategy 2030' <https://www.forum-adb.org/copy-of-accountability-mechanism> (accessed 13 September 2024)
- NGO Forum on ADB 'Collective Civil Society Statement on ESF Draft (to the ADB): Calling for an overhaul and immediate redrafting' (13 May 2024) <https://www.forum-adb.org/post/forumesfsubmission> (accessed 13 September 2024)
- NGO Forum on ADB 'Does ADBs accountability mechanism work?' (2019) <https://www.forum-adb.org/post/does-adb-s-accountability-mechanism-work> (accessed 13 September 2024)
- NGO Forum on ADB 'Joint Submission of NGO Forum on ADB and Both ENDS. Comments on the 2nd draft of the Public Communications Policy (to be renamed as Access to Information Policy "AIP")' (6 April 2018) https://89860407-3dfc-4c56-ada8-a42a9756a280.usrfiles.com/ugd/898604_3e7dbcd1894146dd96dd89687ac2b03a.pdf (accessed 13 September 2024)
- NGO Forum on ADB 'Letter of Introduction to the new ADB President' (2020) <https://www.forum-adb.org/post/letter-of-introduction-to-adb-pres-masatsugu-asakawa> (accessed 13 September 2024)
- NGO Forum on ADB 'NGO Forum on ADB Comments: Safeguard Compliance and Accountability Mechanism Framework' (2019) <https://www.forum-adb.org/post/ngo-forum-on-adb-comments-safeguard-compliance-and-accountability-mechanism-framework> (accessed 13 September 2024)
- NGO Forum on ADB post X.com 05 May 2024 https://x.com/forum_adb/status/1787081928555876586 (accessed 13 September 2024)
- NGO Forum on ADB 'Public Information Policy' <https://www.forum-adb.org/pcp> (accessed 13 September 2024)
- 'NGO Forum network and allies demand accountability from the Asian Development Bank amid Georgia's civic space crisis' EIN Press Wire 4 May 2024 <https://www.8newsnow.com/business/press-releases/ein-presswire/708861228/ngo-forum-network-and-allies-demand-accountability-from-the-asian-development-bank-amid-georgias-civic-space-crisis/> (accessed 13 September 2024)
- Office of the United Nations High Commissioner for Human Rights (OHCHR) 'Remedy in development finance: Guidance and practice' (2022) <https://www.ohchr.org/sites/default/files/2022-03/Remedy-in-Development.pdf> (accessed 13 September 2024)

- OHCHR 'Memorandum comments on the review and update of the ADB Safeguard Policy Statement' (2021) https://www.ohchr.org/sites/default/files/Documents/Issues/Development/DFI/ADB_SPS_29A pril2021.pdf (accessed 13 September 2024)
- Oxfam Australia 'Safeguarding or disregarding? Community experiences with the Asian Development Bank's Safeguard Policies' (2007) <https://www.oxfam.org.au/wp-content/uploads/2011/08/OAus-SafeguardingADB Policies-0107.pdf> (accessed 13 September 2024)
- Partnership for Transparency 'Deepening civil society engagement for development effectiveness' (2017) <https://ptfund.org/deepening-civil-society-engagement-for-development-effectiveness/> (accessed 13 September 2024)
- Peking University 'Public Development Banks and Development Financing Institutions Database' <http://www.dfidatabase.pku.edu.cn/> (accessed 13 September 2024)
- Proparco 'Development Finance Institutions: How to operate in fragile countries' <https://www.proparco.fr/en/article/development-finance-institutions-how-operate-fragile-countries> (accessed 13 September 2024)
- Realty of Aid 'CSO Collective Statement for the 56th ADB Annual Meeting' <https://realityofaid.org/cso-collective-statement-56th-agm/> (accessed 13 September 2024)
- Romero, MJ 'What are the core features of a model Public Development Bank?' Eurodad 10 November 2020 https://www.eurodad.org/public_development_bank_core_features (accessed 13 September 2024)
- United Nations 'Guiding Principles on Business and Human Rights' (2011) https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf (accessed 13 September 2024)
- Yumnam, J 'ADB-financed Imphal Town Ring Road and violations of rights' Imphal Free Press 25 September 2021 <https://www.ifp.co.in/analysis/adb-financed-imphal-town-ring-road-and-violations-of-rights> (accessed 13 September 2024)



Appendix 1: Table summarising CSO engagement with the AfDB, ADB and IDB

Type of engagement	AfDB	ADB	IDB
CSO Framework/ focal points	Developed in 2012. Mainstreams CSO engagement but not necessarily aligned to more recent policies.	1998 NGO engagement policy. Treats CSOs as contractors.	IDB Group-Civil Society engagement strategy (2018). Action Plan makes provision for the measurement of engagement of civil society with quantitative results, in terms of effectiveness, value added, and contribution to knowledge of the social fabric.
Annual meetings	No specific panel for CSOs, problematic attendance.	Specific CSO panel, meetings with ADB management, Learning with partners panels.	Specific CSO panel instituted in 2024.
Country strategies	CSOs invited to engage more recently. Dependent on country.	CSOs invited to engage more recently. Dependent on country.	No engagement to date.
Access to Information	Last updated in 2013. CSO criticisms over lack of CSO engagement on the policy. Problematic list of exceptions. Borrower information often not disclosed, no translations in local languages, no stakeholder engagement plans, limited information on IRM.	Last updated in 2019. Fraught with criticism. Problematic clauses include limited exceptions to protect good relations with States and inter-governmental organisations, a rule that gives all third parties a blanket veto over the release of information, no overall time limit for responding, exclusions and discretionary rules and limited grounds for appeals.	Last updated in 2024. Criticisms over CSO participation in the consultation process. Not yet clear what remaining gaps exist in the new policy.



Type of engagement	AfDB	ADB	IDB
Safeguards	Last updated in 2023. CSO criticisms over lack of CSO engagement, no transparency and accountability, problematic borrower frameworks. No gender differentiation. Some language on reprisals – limited on implementation measures.	Last updated in 2024. Problematic flexible terms, including in the application of borrower systems. Standards are not timebound, mandatory, and compliant.	Approved in 2020, the policy incorporates over 60 CSO recommendations, including an exclusion list and a commitment against reprisals. It strengthens IDB's monitoring, supervision, and due diligence requirements, clarifies roles for IDB and borrowers, and adds protections for marginalized groups to ensure access to project benefits. It also includes stricter requirements for identifying E&S risks, adopts child labor standards, and prohibits biodiversity offsets in critical habitats. The policy features a standalone safeguard on stakeholder engagement and references the Escazú Agreement, addressing access to information, public participation, and reprisals.
Independent Accountability Mechanism	Remedy remains the responsibility of the borrower, mechanism should be disclosed to local communities prior to project appraisal, practical steps needed to address reprisals.	Behind good practice in terms of independence, eligibility criteria, need for greater focus on remedy (including the responsibility of the Bank for remedy), need for a clear procedure for addressing reprisals.	CSO recommendations were incorporated into the Draft Guidelines for the Consultation Phase and the Draft Terms of Reference for the Roster of Process Facilitation Experts, following an IDB internal review in 2021. Recommendations related to MICI were also included in the ESF. The IDB needs to provide clear guidance on structuring effective grievance mechanisms at the project level, based on the UNGPs, in accessible and culturally appropriate formats.
Gender	Gender Strategy (2021-2025). Fairly good but falls short on gender and climate change, sexual and gender minorities, SGBV and SEAH, and staffing. Safeguards policy generally weak on gender.	Operational Plan for Priority 2: Accelerating Progress in Gender Equality (2019-2024). Good on paper. Safeguards policy criticised by CSOs as gender blind.	No specific gender policy. Outlines gender in its Environmental and Social Policy Framework, Standard 9 (2021). Weak in terms of mandate, staffing and M&E but otherwise adequate – good. IDB Invest policy fares worse overall.



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For more information

Email: contact@forus-international.org

Website: www.forus-international.org