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Executive summary

Public Development Banks (PDBs) play a vital role in mobilising resources for sustainable development. Given their public mandate, PDBs can be role models in bringing about social change through human rights-focused, inclusive, and people-centred approaches. Investments by PDBs can have far-reaching effects on communities and their environments, and it

is therefore critical that PDBs are transparent and accountable, and that they consult the very communities which they impact. Yet when projects are carried out without proper due diligence and the appropriate rights-based approach, they can have negative consequences on the very communities that are supposed to benefit from them.



The Coalition for Human and Rights and Development and RaiseTheMic protested outside the World Bank Headquarters in Washington, DC

With the rapid growth in size and scope of PDBs over the last few decades, the nature of engagement with **Civil Society Organisations** (CSOs) has varied. Regular, meaningful, and systematic dialogue between PDBs and CSOs is critical for ensuring development effectiveness, using context-specific knowledge and access to local communities to direct investments towards inclusion and social equity while minimising the risk of projects failing and human rights abuses occurring. CSO engagement can promote sustainable economic growth, drive innovation, and enhance social capital and trust.

This study provides an analysis of CSO engagement across seven PDBs, namely the **African Development Bank** (AfDB), the **Asian Development Bank** (ADB), the **Asian Infrastructure Investment Bank** (AIIB), the **European Bank for Reconstruction**

and **Development** (EBRD), the **Inter-American Development Bank** (IDB), the **New Development Bank** (NDB) and the **World Bank** (WB). It highlights challenges, opportunities, lessons learnt, and good practices in terms of CSO engagement across these PDBs. The study was commissioned by Forus, a global network of 72 national **non-governmental organisation** (NGO) platforms and seven regional coalitions from Africa, America, Asia, Europe, Latin America, the Middle East and North Africa, North America and the Pacific. Forus is the CSO lead for the **Finance in Common Summit** (FiCS) and this study is intended to provide concrete ways in which PDB-CSO dialogue can be strengthened at the FiCS in 2025 and beyond. It is based on a literature review of PDB documents, independent reviews of PDB operations and practices, CSO statements and research papers/articles,



academic papers and media/online articles. It is also based on interviews with 27 stakeholders from PDBs (including officials from accountability and evaluation mechanisms), CSOs and project-affected communities.

The study first examines PDB-CSO engagement in terms of CSO frameworks. It notes that CSO policies can facilitate and deepen these partnerships since they outline the different ways that CSOs can engage at multiple levels while ensuring continuity and reducing bureaucratic hurdles. CSOs can be engaged at the project level, either in project design, implementation, monitoring, or in holding the PDB accountable for the negative consequences of projects through independent accountability mechanisms. At the country level PDBs can engage in country strategies, determining priorities for communities and ensuring that they are translated into Bank projects. CSOs can

“CSO policies can facilitate and deepen these partnerships since they outline the different ways that CSOs can engage at multiple levels while ensuring continuity and reducing bureaucratic hurdles.”

also engage the PDB at a regional/international level on specific PDB policies.

The AfDB and NDB have yet to develop CSO policies, while the EBRD and IDB's CSO frameworks are relatively new. The AfDB has a new Civil Society Engagement Action Plan that has been developed. Some PDBs are moving towards developing indicators that measure and track CSO engagement, as these make CSO policies more successful in implementation. At the ADB, indicators of planned meaningful engagement are analysed across the project level and its 2023 report on CSO engagement



also documents CSO engagement on ADB policies. The AfDB has not yet developed a **monitoring and evaluation** (M&E) framework for CSO engagement but may now have the opportunity with a revitalised Civil Society Engagement Action Plan. The IDB is refining a framework of incentives and reporting structures while fine-tuning metrics. The EBRD promises to take a proactive approach to engaging CSOs, recognising that they represent the fundamental building blocks of the EBRD's mandate to strengthen multiparty democracy. The EBRD considers incentives for CSO engagement, noting that it will develop guidance on mechanisms for CSO engagement. The WB previously considered civic engagement in its Corporate Scorecard, which measures project

results, but recently reduced its list of indicators to achieve what it sees as a more streamlined picture of progress. However, CSOs called for the WB to reinstate an indicator to measure the quality of civic and citizen engagement, which has now been adapted to comprise CSO engagement at both the country and project levels and provide incentives to country teams to go beyond compliance. As the WB experience has shown, measures of civic engagement in PDB results frameworks not only facilitate CSO engagement but, when measured appropriately, have the potential to enhance ownership, and make development more effective, inclusive, and transparent. Across the board, both PDBs and CSOs have emphasised the need for capacity building among all stakeholders on the



“Civic space is shrinking around the globe, and CSO frameworks can therefore ensure a more uniform approach to engaging CSOs across Bank operations and policies.”

nature and value of CSO engagement. In response to the need to strengthen CSO-PBD partnerships, and invest in CSO capacity building, the WB recently announced the launch of CIVIC: The Civil Society and Social Innovation Alliance at its Annual Meeting in 2024. CIVIC is a finance and support facility for CSOs and other social economy actors.

Civic space is shrinking around the globe, and CSO frameworks can therefore ensure a more uniform approach to engaging CSOs across Bank operations and policies. As experience shows, stakeholder engagement frameworks can also enhance PDB-CSO engagement at the country and project level, where consultation is most lacking. Throughout the levels of engagement, CSOs have called for consultations to be diverse, repre-

sentative and inclusive. The ADB, AfDB, EBRD, and WB use CSO committees to facilitate these engagements, although the AfDB's CSO Committee has just been revitalised.

At the project level, the ADB, the AfDB (to a lesser extent), the EBRD, and the WB have successfully used CSOs as contractors. The IDB is set to test measures of CSO engagement across projects, while the AIIB and NDB could develop more institutionalised approaches. In the past, the WB has examined how community engagement can lead to greater project effectiveness, stressing the importance of participatory development. While CSOs are engaged in project design, a WB review of citizen and CSO engagement has found that CSOs could have greater decision-making capacities



●● One challenge is how projects are classified according to risk, with CSOs emphasising the need for communities to be consulted across all projects. ●●

in projects and that their engagement could be strengthened during implementation. CSOs could also play a greater role in social accountability.

At the same time, CSOs around the world have highlighted the impact of projects on communities where there has been inadequate consultation or due diligence. The AfDB's **Independent Recourse Mechanism (IRM)**, the IDB's **Independent Consultation and Investigation Mechanism (MICI)**, and the WB's **Inspection Panel**, for example, have investigated complaints and in many cases, found

a lack of meaningful community consent, issues of reprisals, and negative socio-economic impacts on communities. Meanwhile, the ADB's accountability mechanism could be strengthened to be more in line with other sister institutions and should reconsider its eligibility requirements – a problem noted across many PDBs. The AIIB is currently reviewing the **Project-affected People's Mechanism (PPM)**. Meanwhile, the NDB is in the process of establishing such a mechanism, but CSOs have called for engagement on this policy and argued that it should be in line with international standards. The EBRD's accountability mechanism replaced its old mechanism in 2020 and brought it in line with good practices in ensuring a meaningful process for drafting and implementing management action plans.



Across the board, CSOs have raised issues over the use of country systems, where PDBs rely on the standards of the country in which a project is being implemented rather than PDB policies, or international practices. As a result, CSOs have advocated for PDBs to take a greater role in monitoring client approaches to access to information and environmental and social safeguards. One challenge is how projects are classified according to risk, with CSOs emphasising the need for communities to be consulted across all projects. CSOs have also suggested that project-level grievance mechanisms are insufficient mechanisms to address community concerns, as project case studies at the AIIB, AfDB, IDB, among others, have highlighted. Reprisals remain an issue across all PDBs, illustrating why community engagement is so critical from the outset and the need for independent accountability mechanisms that do not rely on project-level grievances to be first exhausted. It is therefore imperative that PDBs craft safe spaces for CSO and community

engagement with PDB senior management to better direct project investment and prevent reputational risk. Communities also often face inadequate remedies, which is a violation of their human rights according to the **UN Guiding Principles on Business and Human Rights** (UNGPs). This is often compounded by PDBs divesting without responsible exit plans.

At the country level, the EBRD and WB have consultations in the development of country frameworks, and CSOs can engage with the board during country field visits. A 2023 WB Citizen Engagement and Social Accountability Strategic Review provides insights into ways that country efforts can be strengthened, through country-level PDB-government-CSO tripartite sector groups or advisory councils, the use of a systems-oriented approach, and by using digital technology to gather citizen insights. The ADB and AfDB are also increasingly engaging CSOs in country strategies, while the AIIB and NDB's approaches to CSO engagement at the country level can be

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strengthened. The IDB's new CSO action plan emphasises how it intends to conduct specific and systematic training of Country Office civil society liaisons to fulfil the outcomes of its civil society strategy and commits to developing a programme for IDB staff on how to hold effective consultations.

At the regional/international level, CSOs are regularly involved in the annual meetings of the ADB, EBRD, and the WB. At the WB, the **Civil Society Policy Forum** (CSPF) working group, solely made up of CSOs, selects proposals for panel discussions, giving them ownership over the programme. The AfDB and EBRD also make use of CSO committees to assist in developing programmes for annual meetings. The AIIB makes provision for CSO engagement at annual meetings, but some CSOs boycotted the meeting in 2024, citing a lack of meaningful engagement and inadequate meeting formats. The IDB included CSOs in panel discussions in 2024 for the first time

in ten years, while the NDB held a business lunch for CSOs during the annual meetings in 2024. CSOs have demanded the AfDB include them as partners at annual meetings, rather than through separate forums. Across many of the PDBs, CSOs have called for CSO engagement at annual meetings to be mandatory, with greater time to plan and prepare, greater logistical support from PDBs, and adequate time for **Question and Answer** (Q&A) sessions, with deep dives into specific topics.

At the policy level, CSOs have often engaged PDBs over their access to information and safeguards policies. However, across most of these PDBs, such as the AfDB, AIIB, the IDB, and the NDB, CSOs have argued for more inclusive and diverse consultation, with greater operational support towards consultation processes. Most PDBs now publish a schedule of policies and strategies subject to public consultation on their websites, including the ADB, AfDB, AIIB, EBRD, and the WB, although



International Accountability Project World Bank protest



not all policies are open for consultation across the AfDB and AIIB. To enhance CSO engagement, the WB holds monthly calls with CSOs, and the invitation is open to all CSOs that email the Bank's civil society policy team. CSOs have not been engaged in the development of policies at the NDB to date, including in the development of its general strategy, its safeguards policy, and the policy on its accountability mechanism. At several of the PDBs mapped, CSOs have called for clearer feedback on how their suggestions have been incorporated into the final policy.

In terms of access to information, CSOs have emphasised the need for clear, timely, and appropriate disclosure. Rather than exemptions, overrides, and vetoes, CSOs have suggested that there should be a presumption in favour of disclosure due to challenges of limited civic space in some countries where projects are being undertaken and the reliance is on country systems. While some PDBs,

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such as the AIIB and WB, incorporate principles with the presumption in favour of disclosure, lists of exceptions have been highly problematic across many of these Banks, including the ADB, AfDB, IDB, and the NDB. For this reason, CSOs engaging the AfDB, AIIB, IDB, and NDB have been calling for information to be published proactively, with disclosure times, formats, channels, and timeframes. Independent appeals panels can also support these information requests. CSOs have documented the challenges in accessing information across PDB



Forus Financing for Sustainable Development working group in Gaborone, Botswana 2024 © Forus

projects around the world, and the disjuncture between policy and practice. CSOs have also pointed out that even when documents are available, they are often not accessible to local communities, since they are written in technical jargon, and not translated into local languages or easily found by those most impacted. The EBRD has a new Access to Information Policy, effective from 01 January 2025, which reaffirms the EBRD's commitment to the presumption of disclosure and aligns with international best practices on information access. This policy introduces the principle of Proactive Disclosure and Accessibility, as well as a harm test, where the EBRD specifies the type of harm that each of these exceptions is meant to protect against.

A reliance on country safeguard systems has also posed challenges for communities where the client country does not uphold reasonable

standards or ensure adequate consultation. CSOs have therefore called for timebound, mandatory, and compliant standards across PDBs and that PDBs should ensure a greater role in monitoring the client. The challenges associated with a reliance on country systems have been raised at the ADB, AfDB, AIIB, the IDB, and the NDB, while at the WB, CSOs have emphasised the importance of safeguards across the entire WB Group's portfolio.

In the cases of co-financed projects or lower-risk projects, CSOs argue that environmental and social assessments are still critical. Rather than upholding the lowest minimum standards, CSOs have suggested that these should be better aligned to international good practice and the UNGPs. In addition, CSOs at the EBRD and the IDB have called for the full disclosure of environmental and social assessments for lower-risk projects (Categories B

and C). At the EBRD, this is not required under the **Access to Information Policy** (AIP), but the EBRD now makes provision for the disclosure of environmental and social documents for higher-risk Category B projects before Board approval.

Finally, while most PDBs have made efforts to develop gender strategies, this is still outstanding at the NDB. The AIIB developed a gender action plan in September 2024, but CSOs claim to have been excluded from this process. CSOs have stressed that a gender strategy needs to be wide-ranging, with leadership commitments, the incorporation of gender into all aspects of PDB operations, and the inclusion of a gender analysis for projects and country strategies. It should include details on internal practices and gender-responsive budgeting, with specific targets for projects with gender equality objectives. This mapping study reveals common challenges faced by CSOs and communities working across the breadth of PDB operations, making a strong case for more uniform, coordinated, and human rights-focused policy

and practice. It illustrates how CSO engagement with PDBs not only minimises risk but also offers a better return on investment. Moreover, a human-rights approach can direct PDBs towards more inclusive and sustainable development, while preventing violations. CSOs continue to demand a reform of the international financial architecture with greater accountability, and one of the ways to achieve this is through dialogue at the FICS. CSOs have requested that civil society be recognised as an official engagement group at the FICS and that a formal mechanism be established between CSOs and each PDB at headquarters and country levels to strengthen the overall strategy, governance, accountability, transparency, and development outcomes of PDB-related projects and initiatives.

“A reliance on country safeguard systems has also posed challenges for communities where the client country does not uphold reasonable standards or ensure adequate consultation.”

NGO and Civil Society actions at the Asia Clean Energy Forum 2024





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Given that civic space is increasingly constricted in many countries, PDBs should promote and support an enabling environment for civil society and systematically incorporate civic space, human rights, and gender analysis into their projects. PDBs can drive the future towards the achievement of the 2030 Agenda but first need to radically shift their approach to engaging CSOs and adopting a

human rights-based approach to development. In moving forward, this study identifies good practices that PDBs can use to enhance CSO and community engagement, based on the key findings throughout this study.



More than Money Report © Bankwatch and FHID



Good practices for PDBs to enhance PDB-CSO and community engagement based on key findings

PDB-CSO mechanisms

- **Establishment of a PDB-CSO focal point** within each PDB.
- **CSO engagement framework in place**, which details the types of engagement that CSOs can have with PDBs (across the project, country/regional, and international levels), the scope, process, and timeframes for meeting, and measures for M&E.
- **Development of indicators of the effectiveness and quality of engagement** of CSO and citizen engagement and align these to staff incentive structures.
- **Description of the value-added by engaging CSOs as contractors**, in terms of establishing social capital, and as a social accountability mechanism in CSO frameworks.
- **Establishment of diverse and representative CSO committees** for regular engagements with PDBs.
- **Development of CSO stakeholder engagement frameworks.**
- **Provision of sensitisation and capacity support for internal PDB staff**, as well as CSOs, to learn about how engagement can be more meaningful.
- **Review of CSO case studies** on the impact of projects on communities with a view to internal learning.

Project-level

- **CSO engagement at the project design, implementation, and monitoring stage.** Consultation communities at the earliest stages of project inception, particularly for higher-risk projects.
- **Development of indicators to measure CSO engagement in projects** (either in project design, implementation, and monitoring or in terms of effectiveness, and value-added in terms of social capital and trust).
- **Provision of funding to develop budget lines** for CSO engagement at the project level.
- **Involvement of CSOs as a social accountability measure**, such as through citizen scorecards, social audits, or third-party monitoring.
- **Greater monitoring role for PDBs** on human rights due diligence and project safeguards.
- **Adoption of a zero-tolerance approach to reprisals** and adopt measures to prevent and mitigate reprisals

(for example, contextual risk assessments, engaging government counterparts on reprisals, holding separate consultations with vulnerable communities, elevating reports of reprisals above the project or country team).

- **Establishment of IAMs in line with international practice**, which ensures that communities can access IAMs without having first exhausted project-level grievance mechanisms.
- **Community engagement in the drafting of management action plans.**
- **Establishment of clear frameworks on remedy**, giving responsibility to the borrower and a greater monitoring role for the PDB, and establishment of remedy funds.
- **Adoption of responsible exit principles**, ensuring that PDBs do not exit projects without ensuring that environmental and social standards are met, that harm is remediated, and that the negative impacts of an exit are assessed and mitigated.

Country-level

- **Establishment of country-level PDB-government-CSO tripartite sector groups** or advisory councils.
- **Creation of thematic-focused multi-stakeholder dialogue platforms** with sectoral expertise.
- **Adoption of a systems-oriented approach** to country-level CSO engagement.
- **Utilisation of digital technologies to gather CSO and citizen views**, while supporting the protection and promotion of digital space.
- **Guidance for engaging CSOs in country and sector strategies** and throughout the country cycle.
- **Assessment of levels of civic space in country strategies** and use of political economy analysis.

- **Provision of technical and financial support** to CSOs to establish national-local CSO engagement.
- **Establishment of inclusive, multi-stakeholder platforms** to facilitate CSO-government engagement.
- **Integration of citizen engagement with support to government institutions** with oversight and advisory roles.
- **Provision of capacity strengthening support** on PDB-CSO engagement among state and non-state actors.
- **PDB support to enhance political will** and the enabling conditions for CSO engagement.

International level (PDB annual meetings)

- **Involvement of CSOs in the development of annual meeting programmes.**
- **Establishment of CSO committees** to facilitate the development of annual meeting programmes.
- **Engagement of CSOs as genuine partners** at annual meetings, with mandatory attendance.
- **Provision of adequate time for Q&A**, deep dives, and feedback.
- **Provision of a variety of different forms of CSO engagement**, such as panel discussions, roundtable discussions with Executive Directors and PDB management, and townhalls.
- **Provision of logistical and financial support** to CSOs.
- **Creation of various avenues for participation**, including virtual engagement.

Policy level

- **Development of clear stakeholder engagement plans** that detail how CSO and community perspectives will be incorporated into policies.
- **Details of consultations published online**, with provision of adequate time for feedback, and an analysis provided of how feedback has been incorporated.
- **Incorporation of principles with the presumption in favour of disclosure** in Access to Information policies.
- **Proactive publication of information**, with disclosure times, formats, channels, and timeframes.
- **Limitations on exemptions, overrides and vetoes** in Access to Information policies.
- **Establishment of independent appeals panels** for access to information.
- **Establishment of ESFs that go beyond risk mitigation**, with active consideration of how to integrate community and CSO perspectives.
- **Alignment of ESFs and client systems** with the UNGPs.
- **Environmental and social impact assessments on all projects** regardless of risk.
- **A zero-tolerance approach to reprisals in ESFs.**
- **Development of safe spaces** to discuss issues of reprisal.
- **Commitment to international standards** in co-financed projects.
- **Development of gender strategies** that include a commitment to assess and address gender risks.



Mr. Pixelwala

List of Acronyms

ADB Asian Development Bank	DIRCO Department of International Relations and Cooperation	LEAF Lakes Edward and Albert Integrated Fisheries and Water Resources Management
AFD Agence Française de Développement	DPF Development Policy Financing	LHDA Lesotho Highlands Development Authority
AfDB African Development Bank	DRS Dispute Resolution Service	LHWP Lesotho Highlands Water Project
AIDA InterAmerican Association for Environmental Defence	EBRD European Bank for Reconstruction and Development	MDB Multilateral Development Bank
AIIB Asian Infrastructure Investment Bank	ED Executive Directors	M&E Monitoring and Evaluation
AIP Access to Information Policy	EIA Environmental Impact Assessment	MICI Independent Consultation and Investigation Mechanism of the IDB
AM Accountability Mechanism	ESAP Environmental and Social Action Plan	MIGA Multilateral Investment Guarantee Agency
ARC Africa Regional Centre	ESF Environmental and Social Framework	MP Member of Parliament
BIC Bank Information Centre	ESG Environmental, Social and Governance	NDB New Development Bank
BWGED Bangladesh Working Group on External Debt	ESP Environmental and Social Policy	NGO Non-Governmental Organisation
CAO Compliance Advisor Ombudsman	ESPF Environmental and Social Policy Framework	NGOC ADB's NGO and Civil Society Centre
CBO Community-Based Organisation	FICS Finance in Common Summit	OED Operation Evaluation Department
CE Citizen Engagement	FIDH International Federation for Human Rights	OZA Oxfam South Africa
CEE Central and Eastern Europe	GBF Global Biodiversity Framework	PAP Project Affected Persons
CEIU Complaints-resolution, Evaluation and Integrity Unit	IAM Independent Accountability Mechanism	PDB Public Development Bank
CER Centre for Environmental Rights	IAMNet Independent Accountability Mechanisms Network	PPI Policy on Public Information
CESA Citizen Engagement and Social Accountability	IAP International Accountability Project	PPM Project-Affected People's Mechanism
CHRD Coalition for Human Rights in Development	IDB Inter-American Development Bank	Q&A Question and Answer
CIVIC The Civil Society and Social Innovation Alliance	IDEV Independent Development Evaluation Mechanism	SCD Systematic Country Diagnostic
CLEAN Coastal Livelihood and Environmental Action Network	IDP Information Disclosure Policy	SDG Sustainable Development Goal
ConSocs Civil Society Consultative Groups	IED Independent Evaluation Department	SEPS Stakeholder Engagement Plans
COVID-19 Coronavirus disease	IEG Independent Evaluation Group	SLC Seinoli Legal Centre
CPF Country Partnership Framework	IFC International Finance Corporation	TLC Twerwaneho Listeners' Club
CPP Country Partnership Plan	IFI International Financial Institution	UDHR Universal Declaration of Human Rights
CPS Country Partnership Strategy	IFP Investment Project Financing	UHRC Ugandan Human Rights Commission
CSCEF Civil Society Capacity Enhancement Framework	IMF International Monetary Fund	UNGP UN Guiding Principles on Business and Human Rights
CSF-NDB Civil Society Forum of the New Development Bank	IPAM Independent Project Accountability Mechanism	UPDF Uganda People's Defence Force
CSO Civil Society Organisation	IRM Independent Recourse Mechanism	US United States
CSP Country Strategy Paper	ISS Integrated Safeguards System	USAID United States Agency for International Development
CSPF Civil Society Policy Forum	Lao PDR Lao People's Democratic Republic	WB World Bank
CSS Country Safeguards System		WBG World Bank Group
CSSC Civil Society Steering Committee		WRI World Resources Institute
DAI Disclosure and Access to Information Policy (of the AfDB)		
DBSA Development Bank of Southern Africa		



Ollie Craig

1 Introduction

The world faces unprecedented challenges, including economic volatility, climate change, and rising social inequality. As countries recover from the aftermath of COVID-19, amid rising debt crises in developing countries, Public Development Banks (PDBs) have a catalytic role to play in mobilising resources for sustainable development. However, to achieve the 2030 Agenda for Sustainable Development, policies need to shift their financing strategies towards long-term resilience, prioritising investments that support vulnerable populations and supporting development models that prioritise human rights.

PDBs are 'public financial institutions initiated by governments to pursue public policy objectives'.¹ Many PDB projects support the achievement of the 2030 Agenda for Sustainable Development. Given their public mandate, PDBs can bring about social change by promoting people-centred and inclusive policies that focus on the most vulnerable, including women and children. PDBs can target finance to where it is needed most, supporting innovation and

1 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 6 February 2025).



Indigenous Peoples' protest in Bogotá, Colombia © Sebastian Barros/Forus

taking a long-term perspective. Since PDBs are financed with taxpayers' money, accountability and transparency should also be central to their operations.

PDBs can be most effective when they engage with civil society organisations (CSOs),² using CSO's context-specific knowledge and access to local communities to design appropriate interventions and minimise project risk. Furthermore, PDBs can reinforce their commitment to inclusivity and social equity in development financing by adhering to human rights standards. PDBs have an opportunity to be role models in driving responsible, transformative investment, but all too often their interests are driven by shareholders rather than the populations affected by their projects. CSOs call for PDBs to shift from a top-down approach to a community-led and human rights-based approach, and this requires regular, meaningful, and systematic dialogue with CSOs.³ This is particularly relevant in the context of shrinking civic space around the world, as observed by Civicus.⁴

2 An umbrella term used to describe Non-Governmental Organisations (NGOs) and Community-Based Organisations (CBOs).

3 S Martinsone 'Four ways to reimagine public development banks to nurture more equitable, sustainable and rights-based development' *Bond* 6 September 2023 <https://www.bond.org.uk/news/2023/09/four-ways-to-reimagine-public-development-banks-to-nurture-more-equitable-sustainable-and-rights-based-development/> (accessed 6 February 2025).

4 Civicus 'People power under attack. A report based on data from the Civicus Monitor' <https://web.civicus.org/GlobalFindings2024> (2024).

This study aims to provide an analysis of CSO engagement across seven PDBs, namely the African Development Bank (AfDB), the Asian Development Bank (ADB), the Asian Infrastructure Investment Bank (AIIB), the European Bank for Reconstruction and Development (EBRD), the Inter-American Development Bank (IDB), the New Development Bank (NDB), and the World Bank (WB), to highlight challenges, opportunities, lessons learnt and good practices. Specifically, this research study analyses CSO frameworks and mechanisms for engagement across the seven PDBs. It looks at CSO engagement at the project, country, and regional/international levels, as well as CSO engagement across policies.

“This research study analyses CSO frameworks and mechanisms for engagement across the seven PDBs. It looks at CSO engagement at the project, country, and regional/international levels, as well as CSO engagement across policies.”

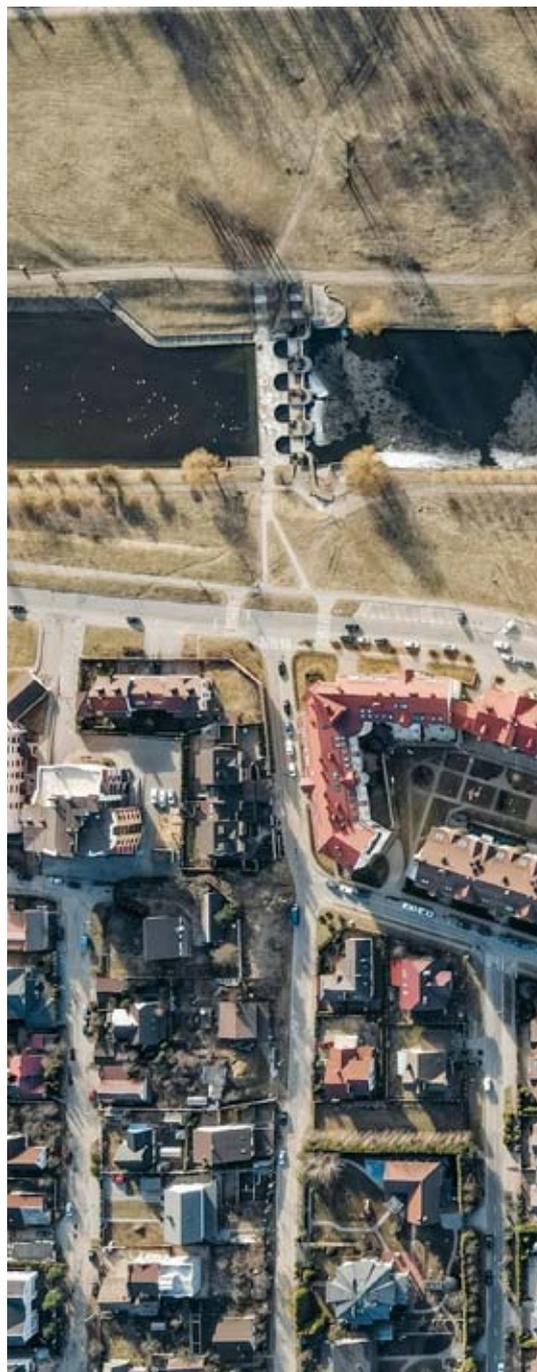
The study was commissioned by Forus, an innovative global network empowering civil society for effective social change. Forus brings together 72 national non-governmental organisation (NGO) platforms and seven regional coalitions from Africa, America, Asia, Europe, Latin America, the Middle East and North Africa, North America and the Pacific – representing over 24 000 NGOs across all continents. 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 assist both PDBs and CSOs in understanding civil society models among peer institutions. While the focus of this study analyses civil society engagement among seven Multilateral Development Banks (MDBs),⁵ national development banks can also benefit by learning about MDBs’ CSO mechanisms as they consider how they develop or strengthen relations with CSOs at national and local levels. The study can also provide knowledge about the experiences of CSOs engaging PDBs in other regions and contexts. Through peer learning across PDBs, CSO networks, and with one another, it is hoped that this study can strengthen relations between PDBs and CSOs, which is essential for the realisation of inclusive, sustainable development.

Forus currently serves as the CSO coordination lead for the Finance in Common Summit (FiCS). 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-

5 It should be noted that the terms PDB, Multilateral Development Banks (MDBs) and International Financial Institutions (IFIs) are used somewhat interchangeably. However, PDBs can also comprise national banks for development, unlike MDBs which are regional and international. IFIs can also comprise certain private financial institutions.

“One of the recurring CSO asks at the FiCS summit over the past five years relates to civic space and strengthening CSO-PDB relations.”

Montreal Global Biodiversity Framework (GBF). This report therefore also offers an opportunity to share experiences of CSO engagement with PDBs at the FiCS. One of the recurring CSO asks at the FiCS summit over the past five years relates to civic space and strengthening CSO-PDB relations. CSOs requested that civil society be recognised as an official engagement group at the FiCS, and that a formal mechanism be established between CSOs and each PDB at headquarters and country levels to strengthen the overall strategy, governance, accountability, transparency, and development outcomes of PDB-related projects and initiatives. CSOs have also urged PDBs to promote and support an enabling environment for civil society and systematically incorporate civic space, human rights and gender analysis.⁶ This can be done through the establishment of a FiCS thematic coalition on ‘Advancing participatory and accountable development through PDB-CSO dialogue’. This study highlights several topics which the PDB-CSO Coalition can reflect on when developing solutions to tackle the key obstacles that limit PDBs from delivering on their development mandates.



Pavil Danilyuk

6 Forus ‘Civil society declaration: Finance in Common Summit – Cartagena, Colombia, 4-6 September 2023’ <https://www.forus-international.org/en/pdf-detail/104365-civil-society-declaration-finance-in-common-summit-2023> (accessed 6 February 2025).



Muhamrem Alper

2 Methodology

As noted earlier, this study maps the ADB, AfDB, AIIB, EBRD, IDB, NDB, and the WB. It is based on a literature review of PDB documents, independent reviews conducted by PDBs, CSO statements, research papers/articles, academic papers, and media/online articles. The study is based on 27 interviews⁷ with representatives from CSO coalitions and working groups, people who work with project-affected communities, PDB officials, and representatives from PDB accountability mechanisms and evaluation departments.⁸ The research made ethical considerations, such as ensuring consent and confidentiality. It is

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- 7 In total, 27 interviews were conducted with PDB officials, officials from PDB accountability and evaluation mechanisms, CSOs and project-affected communities. From this, 20 interviews were held during the first mapping study between May-June 2024, and an additional seven during December 2024-January 2025.
 - 8 All of the PDBs mapped in this study were contacted for interview and/or given the opportunity to provide answers via email. Responses were received from four PDBs and in the fifth case, the author was able to contact officials from the accountability mechanism and evaluation department but not the CSO department. In two cases, the author was unable to secure interviews. Due to time limitations, a minimum of one CSO interview was conducted per PDB.

“ This report primarily focuses on the public-sector engagements of PDBs, given that this is their overarching mandate and the areas in which CSOs have had the most engagement to date. ”



worth emphasising that there may be alternative views that are not covered in this research. It is also important to note that PDBs are at different stages of development and therefore, some PDBs may not have as extensive policies or practices as others.

This report primarily focuses on the public-sector engagements of PDBs, given that this is their overarching mandate and the areas in which CSOs have had the most engagement to date. However, CSOs continue to critique PDBs for scaling up their private-sector development at the expense of communities.⁹ For example, the WB Group (WBG) has been designing its Evolution Roadmap – a playbook for its future operations – which includes scaling up its private sector arms. CSOs have called for greater accountability over its private sector engagements, namely the International Finance Corporation (IFC), illustrating cases in which communities have suffered harm.¹⁰

The World Bank Group (WBG) comprises its public sector side, the International Bank for Reconstruction and Development (IBRD) and the International Development Association (IDA), as well as its private sector side, the IFC and the Multilateral Investment Guarantee Agency (MIGA). The WB, through the IBRD and IDA, lends money to low- and middle-income governments for two general uses: investment projects and policy reforms. While the IBRD and IDA provide credit and non-lending assistance to governments, the IFC provides

9 Reality of Aid ‘Civil society demands the WB Group to rethink the direction of its evolution’ (2023) <https://realityofaid.org/rethink-wbg-evolution/> (accessed 6 February 2025).

10 As above.

loans and equity financing, advice, and technical services to the private sector. MIGA is an international financial institution, that offers political risk insurance and credit enhancement guarantees. Thus, the report mostly focuses on the public-sector side of the WB, although it occasionally draws in relevant examples from the private-sector side, where civil society has increasingly demanded greater accountability by highlighting the negative impacts of private-sector projects on communities.¹¹ For this reason, the report mostly refers to the WB rather than the WBG. The report also focuses on the IDB, rather than its private sector arm, IDB Invest. The other PDBs do not have distinct public and private entities and distinguish between these in their operations and projects. However, it is important to note that some PDBs, such as the EBRD and AIIB, primarily engage the private sector. The report builds on a previous mapping conducted by Forus on the ADB, AfDB and IDB,¹² as well as a toolkit for civil society engagement with PDBs.¹³ The study is intended to inform the 2025 FiCS, an initiative that brings together more than 500 PDBs to work together on addressing sustainable development and climate change.¹⁴

This study illustrates key findings and makes specific recommendations across these areas while drawing some general conclusions. Given that PDBs are at different stages of development, the study provides good practices that are drawn from the key findings in the literature and interviews. However, as PDBs evolve, there are ongoing opportunities to further improve these good practices to address emerging challenges and risks, or to deepen CSO engagement. The next section outlines some of the reasons as to why there should be PDB-CSO engagement.

11 The World Bank Group (WBG) comprises its public sector side, the International Bank for Reconstruction and Development (IBRD) and the International Development Association (IDA), as well as its private sector side, the International Finance Corporation (IFC) and the Multilateral Investment Guarantee Agency (MIGA). The WB, through the IBRD and IDA, lends money to low- and middle-income governments for two general uses: investment projects and policy reforms. While the IBRD and IDA provide credit and non-lending assistance to governments, the IFC provides loans and equity financing, advice and technical services to the private sector. MIGA is an international financial institution, which offers political risk insurance and credit enhancement guarantees. For this reason, the report mostly refers to the WB rather than the WBG.

12 A Lucey 'Engaging Public Development Banks: Case studies of the African Development Bank, Asian Development Bank and Inter-American Development Bank' Forus (2024) <https://www.forus-international.org/en/pdf-detail/118898-engaging-public-development-banks-study> (accessed 6 February 2025).

13 A Lucey 'Engaging Public Development Banks: A toolkit for civil society organisations' (2024) Forus <https://www.forus-international.org/en/pdf-detail/118899-engaging-public-development-banks-a-toolkit-for-civil-society-organisations> (accessed 6 February 2025).

14 Finance in Common 'Who we are' <https://financeincommon.org/> (accessed 6 February 2025).



3 Why should there be PDB-CSO engagement?

Civil society can provide a critical lens on how PDBs operate, including analysing which thematic areas to prioritise, how projects are implemented, how to uphold human rights standards, and how much PDBs engage communities in project design and implementation (as well as remedy when projects go wrong). CSOs can play a variety of direct or indirect roles when engaging a PDB, from improving service delivery to the more critical roles of influencing policy and holding the Bank accountable.

Without adequate CSO and community consultation, PDBs risk projects failing. Poorly developed projects can cause conflict, lead to protests, and harm communities. This in turn can damage a PDB's reputation and ultimately lead to divestment in a project. While complaints submitted to Independent Accountability Mechanisms (IAMs) can raise awareness and action on the negative consequences of projects, engagement with communities and CSOs at the project conceptualisation stage can prevent these harms from occurring. Massive human rights violations caused by projects also raise political questions about interventions in authoritarian states.

CSOs can be particularly instrumental in the context of fragile and conflict-affected

states.¹⁵ In situations of weakened institutional structures, poverty, exclusion, and disputes over scarce resources, CSO engagement can be critical in ensuring that development is done transparently and inclusively and is more responsive to community needs and less susceptible to corruption. Moreover, CSO engagement can improve development outcomes and has the potential to reduce future conflict.¹⁶

Damir / IDB



Case study: The IDB's shift towards engaging CSOs on projects

In 2017, the IDB conducted a review of 'Lessons from four decades of infrastructure project-related conflicts in Latin America and the Caribbean'.¹⁷ The review found that, of the 200 projects analysed in their database, 36 were cancelled because of conflicts, while 162 projects faced delays, and 116 faced cost overruns. According to the review, the main conflict drivers were deficient planning, reduced access to resources, lack of community benefits, and lack of adequate consultation. They further found that conflicts often escalated because community concerns were unresolved. The review concluded that strategic engagement with civil society helps mitigate the risk of conflict associated with operations and related costs. The IDB has since developed a renewed IDB Group – Civil Society Engagement Strategy to address these challenges, with an action plan to measure quantitative results in terms of effectiveness, value-added and contribution to knowledge of the social fabric.

15 C Malena 'Citizens at the center: A strategic review of good practices and lessons learned for renewal of World Bank support for citizen engagement and social accountability' (8 December 2023) <https://thedocs.worldbank.org/en/doc/53d4f17646f52f82d43b7379dd004811-0090012024/original/CESA-Strategic-Review.pdf> (accessed 6 February 2025).

16 As above.

17 IDB 'Lessons from four decades of infrastructure project-related conflicts in Latin America and the Caribbean' (2017) <https://publications.iadb.org/en/lessons-four-decades-infrastructure-project-related-conflicts-latin-america-and-caribbean> (accessed 6 February 2025).

PDBs have a moral imperative to invest in human-rights approaches and due diligence. Democratised development enables PDBs to ‘do development better’ by allowing local communities to choose their destinies. Some PDBs, namely the French Development Agency (AFD), the European Investment Bank (EIB), the Council of Europe Development Bank, the International Fund for Agricultural Development, and the EBRD, are already leading the way in adopting a human rights-based approach to development, having endorsed the first FiCS 2022 Human Rights and Human Rights-Based Approach Statement.¹⁸ However, a 2023 report by over 100 civil society activists, ‘Demystifying development finance’, uses case studies from 20 countries around the world to outline how PDBs continue to exacerbate the problems they are intended to solve. The report stresses that a push towards privatisation, using extractivist and top-down approaches, and with the limitations of PDB social and environmental safeguards, often deepens inequalities, leading to violations, fuelling climate change, and increasing debt.¹⁹

Moreover, a report by the International Federation for Human Rights (FIDH) and the Central and Eastern Europe (CEE) Bankwatch Network, ‘More than money: Public development banks must strengthen human rights safeguards’, analyses the environmental and social sustainability frameworks employed by the EIB, the EBRD, the AFD, and the IFC. The report finds that, while their frameworks provide a solid basis for exercising human rights due diligence, there are still significant shortcomings in transparency and public participation in the identification, prevention, management, and remediation of human rights risks and impacts.²⁰ The EBRD has since adopted a new ESP and AIP, which address some of these shortcomings.

Beyond their moral imperative, there is a strong business case for engaging CSOs. A publication, entitled ‘The business case for civil society’ outlines why businesses should engage civil society.²¹ The same reasons are all the more relevant for PDBs, since they have a public mandate. The reasons are adapted from the publication and detailed below.

18 Finance in Common ‘Public Development Banks statement on human rights and human rights-based approach’ (8 November 2022) <https://financeincommon.org/public-development-banks-statement-on-human-rights-and-human-rights-based-approach> (accessed 6 February 2025).

19 Coalition for Human Rights in Development ‘Demystifying development finance: How public development banks impact people and the planet’ (2023) <https://rightsindevelopment.org/pdbs/> (accessed 6 February 2025).

20 International Federation for Human Rights (FIDH) & Bankwatch ‘More than money: Public development banks must strengthen human rights safeguards’ (6 May 2024) https://bankwatch.org/press_release/more-than-money-new-report-reveals-shortcomings-in-human-rights-policies-of-leading-public-development-banks (accessed 6 February 2025).

21 E Rekosh & L Khadar ‘The business case for civil society’ (2018) https://rightscolab.org/wp-content/uploads/2018/12/the_business_case_for_civil_society.pdf (accessed 6 February 2025).

REASON TO ENGAGE CSOs**RATIONALE****Civic freedoms advance economic growth**

Greater respect for CSOs and civic freedoms increases financial investment, facilitates economic reform, reduces social unrest and allows both ideas and resources to spread at unprecedented rates.

Civic freedoms produce innovation

Institutions that encourage creativity, open communication and shared values among their employees as a part of their organisational culture are likely to be better innovators than institutions that adhere to strict bureaucracy and hierarchy.

Civil society reduces the cost of corruption

An open and transparent democracy – with unencumbered CSOs enjoying civic freedoms – plays an important role in reducing corruption, which negatively impacts economic growth.

Civil society organisations can help projects to be sustainable

The success of a project depends on investing in human and social capital.

Supporting civil society can help manage risks relating to operational costs

By providing information on potential harms, CSOs and social movements reduce the risk of significant operational costs due to work stoppages and other operational delays. CSOs can secure a social license to operate from local communities.

Supporting civil society can enhance relationships

CSOs are important both to investor decision-making and the risk oversight function of corporate boards because they represent independent sources of information about material ESG risks.

Supporting civil society can enhance employee relationships

Failing to live up to corporate values on social issues can cause employee backlash. When CSOs are defending human rights against a hostile government, it is particularly incumbent on institutions to use their influence to support civil society. It is in their business interest to do so.



4 PDB-CSO mechanisms

This section analyses PDB-CSO mechanisms and frameworks for engagement. It looks at PDB governance structures and outlines the biggest shareholders across the seven PDBs surveyed, as these are the key decision-makers at the board level. This section also identifies the CSO focal points at each PDB, and some of the CSO coalitions that engage with these PDBs at the institutional level, both through CSO committees established by PDBs and selected by CSOs, but also through some of the coalitions that serve as watchdogs (rather than contractors). However, it is important to recognise that this list is not exhaustive and that CSOs have diverse standpoints and interests. Table 1 summarises an overview of the analysis provided in this section.

4.1 Overview of PDB-CSO mechanisms

Table 1: Overview of PDB-CSO mechanisms

ADB 			
Biggest share-holders Australia, China, Japan, India and the US	CSO framework 1998 Policy on Cooperation between the ADB and NGOs. Treats CSOs as contractors.	PDB-CSO focal points The NGO and Civil Society Centre.	Examples of CSO Coalitions engaging PDBs at the institutional level (not exhaustive) NGO Forum on ADB Reality of Aid Re-course CEE Bankwatch Network
AfDB 			
Biggest share-holders Algeria, Egypt, Japan, Nigeria and the US	CSO framework Framework for Enhanced Engagement with CSOs (2012). Mainstreams CSO engagement but lacks more concrete guidance and an M&E framework to monitor CSO engagement.	PDB-CSO focal points A Gender, Women and Civil Society department, with a Civil Society and Community Engagement Division and Social Innovation division dedicated to civil society engagement.	Examples of CSO Coalitions engaging PDBs at the institutional level (not exhaustive) The CSO committee (<i>aligned to the AfDB</i>) The CSO working group on the AfDB CHRDR BIC
AIIB 			
Biggest share-holders China, India, France, Germany and Russia	CSO framework No specific CSO framework. CSO engagement detailed in its Corporate Strategy (2020).	PDB-CSO focal points Civil society officer in the Communications Department.	Examples of CSO Coalitions engaging PDBs at the institutional level (not exhaustive) NGO Forum on ADB Re-course Accountability Counsel
EBRD 			
Biggest share-holders EIB, EU and the US. France, Germany, Italy, Japan, and the UK have equal shares	CSO framework The EBRD's approach to civil society engagement (2024-2029) and the CSCEF. The approach acknowledges the need to shift to a proactive approach and recognises the unique contribution of CSOs in building social capital and trust and building multiparty democracy.	PDB-CSO focal points The Civil Society Engagement Unit utilises the EBRD's technical cooperation funds to build capacity. Through the steering committee, CSOs hold meetings with the President and Senior management. The Board of Directors undertakes consultation visits to the countries of operations.	Examples of CSO Coalitions engaging PDBs at the institutional level (not exhaustive) EBRD CSO Steering Committee (<i>aligned to the EBRD</i>) CEE Bankwatch Network Recourse

Biggest share-holders

Argentina, Brazil, Japan, Mexico and the US

CSO framework

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.

PDB-CSO focal points

Citizen/civil society engagement topics are led by the Vice Presidency for Countries from Washington, DC. There is also a civil society focal point.

Examples of CSO Coalitions engaging PDBs at the institutional level (not exhaustive)

IDB Working group
CHRD
BIC

Biggest share-holders

Brazil, Russia, India, China and South Africa

CSO framework

No specific CSO framework but its strategies (2017-2021, 2022-2026) commit to strengthening institutional relationships with CSOs. Latest strategy commits to a roadmap for partnerships, with deliverables, modes of interaction, and workplans.

PDB-CSO focal points

The Corporate Communications Division.

Examples of CSO Coalitions engaging PDBs at the institutional level (not exhaustive)

CSF of the NDB

Biggest share-holders

France, Germany, Japan, the United Kingdom and the US

CSO framework

Strategic Framework for Mainstreaming Citizen Engagement, 2014 (to be updated).

New 'quality of civic and citizen engagement' indicator is included in the WB's Operational Dashboard of the updated Corporate Scorecard.

Dedicated CSO financing multi-donor trust fund, the Global Partnership for Social Accountability (GPSA). The GPSA will be succeeded by a new financing and partnership vehicle for civil society, CIVIC: The Civil Society and Social Innovation Alliance.

PDB-CSO focal points

The Civil Society Team is dedicated to CSO engagement at headquarters. Direct engagement with the Board happens at the Spring and Annual Meetings and the President holds a town-hall with CSOs at the Annual Meetings. External affairs officers in client countries are responsible for engagement at the country level.

Examples of CSO Coalitions engaging PDBs at the institutional level (not exhaustive)

CSPF Working Group for annual meetings (*aligned to the WB*)
Open monthly calls for CSOs with the civil society policy team
WB-CSO Working Group monthly meeting on Citizen Engagement
BIC
Bretton Woods Project
Re-course



4.2 PDB-CSO governance structure

Among different PDBs, governance structures (and their related CSO focal points) vary. CSOs also operate along different formal and informal networks. One of the biggest challenges in ensuring stronger CSO-PDB engagement stems from a limited understanding on both sides: from the PDB there can be a lack of awareness of the value-added by CSOs in strengthening policy and practice, while from CSOs this may be because CSOs are not acquainted with how and whom they should engage.

Each of the PDBs surveyed has a similar governance structure. The Board of Governors is the highest decision-making body. There is also a Board of Directors, where key decisions are made, and a President of the Bank who runs its management. It is important to note that the Board of Directors represents shareholder interests and can therefore be an important avenue for CSOs to engage with. In particular, CSOs can identify specific countries and stakeholders (including government ministries) on the board that are open to civil society engagement and engage them on specific Bank projects, or Bank

policies. For example, the Bank Information Centre (BIC) and the United States Agency for International Development (USAID) co-host meetings with various United States (US) government agencies and civil society organisations on the first Tuesday of every month to discuss project-related issues and policy relating to PDBs.²² There is also an IFI working group of 20 organisations across the United States that engages with the WB as well as other multilateral organisations, which is co-chaired by BIC.²³

As can be seen from the table above, the US is a key shareholder in the ADB, the AfDB, the EBRD, and the WB. Japan features as a key stakeholder in the ADB, AfDB, EBRD, IDB, and the WB. China is a key shareholder in the ADB, AIIB, and NDB. India is a key shareholder in the ADB, AIIB and NDB, while Russia influences the AIIB and NDB as a key shareholder. Brazil is a key shareholder at the IDB and NDB, while France and Germany are key shareholders in the AIIB and WB. The dominance of some countries in terms of decision-making at these PDBs has led to CSO criticisms that the global financial architecture needs to be reformed and that the developing countries in which most PDB projects are undertaken should have a greater say in how projects are funded.²⁴ Forus, along with other civil society partners, calls for transformative change within global development to redistribute decision-making power, resources, and leadership to communities, particularly in the Global South, supporting them to lead and shape their own development futures. This approach goes beyond traditional localisation, calling for a fundamental shift in power dynamics – including with PDBs – to create equitable partnerships based on trust, mutual respect, and accountability.²⁵

22 Bank Information Centre (BIC) 'Updates' <https://bankinformationcenter.org/en-us/updates/> (accessed 6 February 2025).

23 IFI Working Group 'About' <https://ifworkinggroup.org/about> (accessed 6 February 2025).

24 Bretton Woods Project 'The lost call for international financial architecture reform in the G20' (2024) <https://www.brettonwoodsproject.org/2024/10/the-lost-call-for-international-financial-architecture-reform-in-the-g20/> (accessed 6 February 2025).

25 Forus 'Power shifts and gender justice' <https://www.forus-international.org/en/power-shifts-and-gender-justice> (accessed 6 February 2025).



“ The ADB has now developed a primer document that NGOs can use to identify business opportunities for NGOs. ”

4.3 PDB-CSO frameworks

4.3.1 PDB-CSO framework analysis

Some PDBs have specific CSO frameworks for engagement and have institutionalised specific CSO departments. These have assisted engagement between PDBs and CSOs by giving clarity on the value-added by CSOs, reducing bureaucratic processes, and ensuring continuity in the event of staff turnover. They have also, in some instances, improved project design, implementation, and monitoring. However, in other instances, policies have fallen short of determining meaningful participation. The PDB-CSO engagement frameworks and institutional structures (or lack thereof) are examined across the seven PDBs analysed in this study below. On the CSO side, CSOs have joined coalitions to form working groups on specific PDBs, such as the AfDB and IDB. It should be noted that some CSOs work on various PDBs, rather than one in particular. For example, the IFI working group in the US examines projects across the ADB, the AfDB, the IDB, and the WB Group. Re-course leads on civil society coordination in Europe and monitors the ADB,

AfDB, AIIB, and WB, among others. CEE Bankwatch Network is also a European network of CSOs engaged with the AIIB, the ADB, the EBRD, and the EIB. Accountability Counsel supports communities harmed by PDB projects to obtain justice and advocates for greater accountability standards in IAMs.

ADB

The 1998 ADB policy on 'Cooperation between Asian Development Bank and Nongovernmental Organisations'²⁶ 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.²⁷ While the policy considers the diversity of NGO relationships, it stresses the sovereignty of governments, noting that it is important to 'identify NGOs with which cooperation would not be mutually constructive'.²⁸ 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.²⁹ More recently, the ADB has developed an approach to meaningful engagement with CSOs, which is further detailed in the section on 'Project-level engagement'. This is detailed in its 2023 report. It is worth noting that the latest report now also contains an analysis of CSO participation in policy review, country programming, and other institutional documents, which are also analysed later.³⁰ However, CSOs have held the ADB to account for its development approach more broadly.

26 ADB 'Cooperation between Asian Development Bank and Nongovernmental Organisations' (1998) <https://www.adb.org/sites/default/files/institutional-document/32018/adb-ngo-policy.pdf> (accessed 6 February 2025).

27 As above.

28 ADB (n 26) 17-18.

29 ADB 'Working with ADB: A primer for identifying business opportunities for NGOs' (2018) <https://www.adb.org/publications/primer-identifying-business-opportunities-ngos> (accessed 6 February 2025).

30 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 6 February 2025).



Case study: Holding the ADB accountable for its development approach

In 2019, Reality of Aid produced a report³¹ that evaluated the ADB in terms of effective development cooperation principles.³² While the ADB conducts development effectiveness evaluations through its Independent Evaluation Department (IED) to assess its progress in achieving its overarching Strategy 2030, the civil society review gave perspectives from civil society and project-affected communities. The report gave recommendations to improve the Bank's governance system, with more voting power for less powerful countries, greater investment in environmentally sustainable and inclusive projects, and stronger country systems that adhere to human rights and involve greater genuine participation by CSOs across all levels of ADB operations. In 2023, more than 130 CSOs signed a collective statement ahead of the ADB's annual meeting with similar messages.³³

In 2001, the ADB established the NGO Network and NGO Centre, which was later renamed the NGO and Civil Society Centre. The ADB has engaged CSOs, including integrating CSO engagement

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- 31 Reality of Aid 'Asian Development Bank: (Mis)shaping development cooperation and effectiveness in Asia Pacific: A CSO review of ADBs development effectiveness' (23 November 2019) <https://realityofaid.org/asian-development-bank-misshaping-development-cooperation-and-effectiveness-in-asia-pacific-a-cso-review-of-adbs-development-effectiveness/> (accessed 6 February 2025).
 - 32 These are principles created by the Development Assistance Committee of the Organisation for Economic Co-operation and Development (OECD-DAC), an organisation that aims to encourage more effective, transparent development cooperation and financing. The OECD-DAC defines development effectiveness as 'the extent to which a given development intervention's objectives were achieved, or are expected to be achieved, taking into account their relative importance'. Over time, these development principles have become enunciated as: 1) Ownership; 2) Focus on results; 3) Inclusive development partnerships; and 4) Transparency and accountability.
 - 33 Reliefweb 'CSO Collective Statement for the 56th ADB Annual Meeting' (2023) <https://reliefweb.int/report/world/cso-collective-statement-56th-adb-annual-meeting> (accessed 6 February 2025).

into annual meetings.³⁴ 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. On the civil society side, 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 WB and the International Monetary Fund (IMF). It was reorganised in 1997 and established regional working groups representing Central Asia, the Mekong Subregion, the 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 ADB issues annual reports on its engagement with CSOs. It measures meaningful planned engagement with CSOs at the project level (which is discussed later in this document), while also documenting CSO engagement on country strategies and policy reviews.³⁵ Moreover, the ADB has built capacity among ADB staff on CSO engagement, such as by organising a regional training in South East Asia and through monthly brown bag discussions with CSOs.³⁶ The ADB also developed a *Sourcebook for engaging CSOs in ADB operations*, which contains advice, templates and tips for ADB staff and country officials to use when designing, implementing and monitoring ADB-financed projects.³⁷ In addition, the ADB has built the capacity of CSOs through strategic partnerships with NGO networks. Despite clear frameworks and mechanisms for engagement with CSOs, as well as good visibility for CSOs across ADB operations, the NGO Forum on ADB has raised questions over the genuine nature of the ADB's consultations. For example, the Forum decided to boycott the ADB's 13 May 2004 Annual Meeting due to

frustrations with the way consultations are being carried out at ADB, which in our opinion often serve to validate rather than challenge the status quo and in any case serve to reinforce the power of the Asian Development Bank and governments over local communities.³⁸

34 ADB 'The ADB's Cooperation with NGOs and civil society' (2004) https://cdn.ymaws.com/www.istr.org/resource/resmgr/working_papers_toronto/curtis.grant.pdf (accessed 6 February 2025).

35 ADB 'ADB Cooperation with Civil Society Annual Reports' <https://www.adb.org/documents/series/adb-cooperation-with-civil-society-annual-reports> (accessed 6 February 2025).

36 ADB (n 30).

37 ADB *A sourcebook for engaging with civil society organisations in Asian Development Bank Operations* (2021) <https://www.adb.org/publications/sourcebook-engaging-csos-adb-operations> (accessed 6 February 2025).

38 NGO Forum on ADB Press Release 'A betrayal of Asia and the Pacific: Boycott of the 37th Annual Meeting of the Asian Development Bank' (13 May 2004), cited in G Curtis 'The Asian Development Bank's cooperation with NGOs and civil society' (2024) https://cdn.ymaws.com/www.istr.org/resource/resmgr/working_papers_toronto/curtis.grant.pdf (accessed 6 February 2025).

AfDB

Meanwhile, the AfDB revised its original 1999 framework for CSO engagement in 2012, now called the Framework for Enhanced Engagement with CSOs.³⁹ It suggests four areas in which collaboration with CSOs could be particularly important, namely capacity building with CSOs, the integrated environmental and social safeguards systems, the Independent Review Mechanism (now known as the Independent Recourse Mechanism), and work in fragile member states. The strategy outlines a matrix for CSO engagement at the corporate, region/county, and project level, according to outreach and communications, dialogue and consultation, and partnerships.

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 review made recommendations to enhance AfDB-CSO engagement. This included enhancing awareness and a common understanding of the purpose and potential value-added of CSO engagement (which could be achieved through communicating guiding documents and tools), developing a monitoring and evaluation (M&E) framework, and integrating CSO outputs into AfDB frameworks. It suggested that the AfDB enhance the resourcing approach for effective implementation of CSO engagement.⁴⁰ There is now a Civil Society Engagement Action Plan 2024-2028 that was launched in October 2024. The plan, while not available online, is said to focus on creating an enabling environment for CSOs, mainstreaming CSO engagement, and generating knowledge and enhanced policy dialogue.⁴¹ It remains to be seen how the plan is put into practice. However, the AfDB would benefit from putting this document on its website and providing a transparent platform for CSO feedback.

Unlike other PDBs that engage CSOs alongside annual meetings, the AfDB has held a specific Civil Society Forum. This was initially established in 2000, and meetings were held in 2011, and then yearly.⁴² However, civil society has criticised the Bank for organising separate continental and regional CSO forums, noting that 'the nature of these forums

39 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 6 February 2025).

40 Independent Development Evaluation African Development Bank 'Evaluation of the African Development Bank's engagement with civil society' (2022) <https://idev.afdb.org/sites/default/files/documents/files/Girma%20Kumbi%20Presentation.pdf> (accessed 6 February 2025).

41 AfDB 'African Development Bank Civil Society Engagement Action Plan 2024-2028' <https://www.afdb.org/en/news-and-events/events/african-development-bank-civil-society-engagement-action-plan-2024-2028-74743> (accessed 6 February 2025).

42 See AfDB 'Renewal of the Bank Civil Society Committee' (2023) <https://cse.afdb.org/sites/default/files/Documents/Bank-CS%20Committee%20Renewal%20Process%202023%20Final.pdf> (accessed 6 February 2025).

often resembles partnership meetings rather than platforms for meaningful and critical dialogue with the Bank's decision-makers'.⁴³ They have also requested a formal space at annual meetings.⁴⁴

The AfDB also developed a CSO Committee, which was renewed in 2024, after it found that it lacked influence in strategic decisions, and in terms of accountability and representativity.⁴⁵ 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.⁴⁶ The AfDB has used the CSO Committee to reach out to CSOs to submit calls for proposals on green growth and climate change. At this stage, it is unclear if the CSO Committee will be used to engage at annual meetings in the future, or how the Committee can be involved in proactively designing policy, rather than being engaged once a policy has been drafted. At the same time, there is an AfDB CSO working group, which includes the Coalition for Human Rights in Development (CHRD) and the Bank Information Centre (BIC) coalitions and is separate from the CSO Committee. The AfDB has also sought to build the capacity of CSOs – for example by signing an agreement with the West Africa Civil Society Institute in December 2023 that outlined collaboration in CSO capacity building, resource mobilisation, knowledge management, and advocacy.⁴⁷

AIIB

The AIIB does not have a specific CSO engagement framework. Its Corporate Strategy (2020) states that: 'Effective partnerships are needed where all stakeholders (governments, the private sector, MDBs, civil society organisations and others) cooperate with and complement

43 Coalition for Human Rights and Development 'The importance of creating space for meaningful civil society engagement at the 2024 AfDB annual meetings' (2024) <https://rightsinddevelopment.org/news/the-importance-of-creating-space-for-meaningful-civil-society-engagement-at-the-2024-afdb-annual-meetings/> (accessed 6 February 2025).

44 As above.

45 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 6 February 2024). See also AfDB 'Call for applications for the renewal of the Bank Civil Society Committee' (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 6 February 2025).

46 As above.

47 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 6 February 2025).



each other.⁴⁸ Its website claims that two regularly scheduled events are hosted with CSOs during the AIIB Annual Meeting – one with the Bank’s management for an exchange on a range of topics including policies, strategies, and operations and a separate session with the Complaints-resolution, Evaluation and Integrity Unit (CEIU). However, CSOs have noted that the approach is ‘contradictory’ in that, despite recent commitments by AIIB management to engage civil society, there is no uniform approach. CSOs have demanded that they be included in panel discussions at the annual meetings (which they continue to be excluded from), rather than a separate civil society session with management and that the format of annual meetings change to allow for deep dives and meaningful feedback.⁴⁹ The main focal point is a civil society officer in the Communications Department. On the civil society side, the NGO Forum has expanded its work on the ADB to also encompass the AIIB, while Northern-

48 AIIB ‘Corporate strategy’ (2020) 16 https://www.aiib.org/en/policies-strategies/strategies/content/index/_download/AIIB-Corporate-Strategy.pdf (accessed 6 February 2025).

49 Re-course ‘Letter to the AIIB: Concern over civil society engagement in the AIIB Annual Meeting 2024’ <https://re-course.org/newsupdates/aiib-annual-meeting-2024-letter/> (accessed 6 February 2025).

based organisations such as CEE Bankwatch Network and Re-course aim to influence the AIIB as well as Northern shareholders.

EBRD

The EBRD's approach to civil society engagement (2024-2029) considers civil society as a key partner in mitigating risks and generating impact.⁵⁰ The approach is aligned with the EBRD's mandate of applying the principles of multiparty democracy and pluralism, while it also recognises the role of CSOs in promoting the Bank's Environmental and Social Policy, in engaging on access to information, and on the Independent Project Accountability Mechanism (IPAM). Specifically, the approach notes the role of civil society in building greener and more inclusive economies and sees civil society as a key enabler of international development. It observes at least three levels of engagement with civil society, namely outreach, disclosure of information, and dialogue and consultation, but most importantly acknowledges the need to shift from a reactive approach that responds to complaints and information requests, to truly proactive engagements using modernised tools and instruments of engagement, such as social media. It pinpoints the unique added advantage of CSOs as generating social capital and trust, and facilitating greater engagement in political, social, and governance reforms.⁵¹ It considers civil society as critical voices and therefore aims to consistently and continuously explore possibilities for meaningful and impactful civil society-centred partnerships in the field of policy and advocacy, capacity building, operational collaboration, and knowledge and best-practice sharing.

As noted in the EBRD's approach to civil society engagement, the EBRD engages CSOs through annual meetings and events through both high-level exchanges and on specific projects, including through the Civil Society Programme at the EBRD's Annual Meeting and Business Forum. It also has formal consultations. Operationally, the EBRD has a Civil Society Capacity Enhancement Framework (CSCEF). The overall objective is to enhance the capacity of local and national actors for awareness raising and skills transfer to target beneficiaries among the public.

50 EBRD 'The EBRD's approach to civil society engagement' (2024) <https://www.ebrd.com/ebird-approach-civil-society/2024-29.pdf> (accessed 6 February 2025).

51 As above.



Case study: A growth in the EBRD's consultations with CSOs

In 2016, the EBRD developed a roadmap for civil society engagement (2017-2020). Under the roadmap, it operationalised its CSCEF, which states how CSOs are engaged in technical cooperation projects. However, beyond this, it also states the importance of formal and regular consultations.

The EBRD's approach to civil society notes that to tackle the challenges posed by the COVID-19 pandemic, the Bank held country-specific consultations between the EBRD President and CSOs. It hosted more than 20 country-specific consultations on COVID-19 in 2021. Due to the success of these engagements, it increased its number of consultations between the EBRD President and CSOs from one in 2018, to three in 2019, ten in 2021, and 12 in 2022. The EBRD surveyed the Bank's civil society engagement and found that the CSCEF was a successful engagement mechanism, while engagement at a project level was most impactful. The active consideration of CSOs had helped to build trust, while the annual meeting and open dialogue were considered 'trust enhancers'. The CSE team also enhanced internal collaboration with other Bank teams and signed memoranda of understanding to enhance project implementation with Save the Children, Oxfam, and the Open Contracting Partnership. Moreover, the EBRD's total number of consultations with CSOs (including Sector/Country strategy consultations, President's meetings, and Board meetings) has risen. In total, 14 consultations were held in 2018, 13 consultations were held in 2019, 35 consultations were held in 2021, 22 consultations were held in 2022, and 49 consultations were held in both 2023 and 2024.⁵²

52 Personal communication with the EBRD, January 2025.

The CSCEF sets out recommended actions to achieve its Strategic Objectives.⁵³ In terms of supporting civil society through meaningful mechanisms (Strategic Objective 1), it aims to use the CSCEF to further strengthen CSOs but also states that it will engage CSOs as experts and implementation partners while building partnerships with international and national partners to enhance linkages at the grassroots level. The EBRD has established a Steering Committee made up of CSO representatives selected by civil society, which is a platform for collaboration on the Civil Society Programme at the Annual Meetings, to support consultation processes for EBRD institutional documents, country and sector strategies, and to provide a safe space for the discussion of civil society concerns. CSOs seated on the Steering Committee represent not only a thematic area but also represent CSOs from the region they come from and their wider CSO networks. The responsibilities of the Steering Committee include supporting the EBRD with the consultation process for country and sector strategies as well as organising the CSO programme at the EBRD Annual Meeting. Currently, Steering Committee members disseminate information to the CSOs in their networks and feedback any relevant information to the EBRD. The Bank also commits to expanding outreach beyond the EBRD CSO newsletter and postings on the web and social media, to also include in-person and hybrid webinars, and enhancing CSO representation at flagship events.⁵⁴

In Strategic Objective 2 (responding to global crises where they affect EBRD regions by engaging with civil society), the new approach commits to promoting knowledge exchange and partnerships with CSOs to address global crises.⁵⁵ It proposes to increase community participation in post-disaster recovery, including by creating mechanisms for effective community engagement and collective decision-making, and by supporting CSOs to tackle the economic and social inclusion of refugees. On the Strategic Objective 3 (developing a safe and open civic space), the approach aims to foster EBRD consultation mechanisms, raise awareness of civil society through EBRD external and internal reporting, and work with other PDBs to advocate for a safe space for civil engagement. The EBRD has already made efforts to raise awareness among other sister institutions on the importance of CSO engagement and held a workshop in February 2021 aimed at raising staff capacity in this regard.⁵⁶ The EBRD has also developed a free online training tool for clients on meaningful stakeholder engagement.⁵⁷

53 EBRD (n 50).

54 As above.

55 Personal communication with the EBRD, January 2025.

56 EBRD (n 50).

57 EBRD 'Community Engagement for EBRD Stakeholders E-Learning Course' <https://ebrdelearning.com/community-engagement-ebdr-stakeholders-e-learning-course> (accessed 6 February 2025).

Finally, to implement Strategic Objective 4 (strengthening the Bank’s internal incentives for civil society engagement, effectiveness and accountability), the EBRD approach to civil society states that it will develop guidance on the EBRD’s mechanisms for engagement with CSOs, including: (1) facilitating meetings between civil society and the EBRD President, Board of Directors and staff; (2) ensuring the safety of civil society and protecting it against retaliation; (3) managing complaints and requests from civil society; (4) ensuring inclusive and accessible consultations; and (5) managing the EBRD’s CSCEF and strategic partnerships with civil society.⁵⁸ It commits to engaging civil society on country and sector strategies and banking operations, to promote CSOs in providing consulting and expert advice, and developing the EBRD’s institutional capacity in civil society and stakeholder engagement. The EBRD has therefore considered how to create safe spaces for engagement with CSOs.

IDB

At the IDB, engagement has strengthened since a change of leadership, under which Ilan Goldfajn was elected as IDB president in 2022.⁵⁹ The 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 and was approved in 2018.⁶⁰ The Strategy is complemented by an Action Plan for Implementation of the IDB Group – Civil Society Engagement Strategy for Operations and Initiatives (2019-2021).⁶¹ The strategy makes provision to strengthen civil society involvement in IDB annual forums (where civil society was included in discussions for the first time since 2024), to strengthen and fine-tune the role of civil society consultative groups, and to foster forums for social innovation and thematic knowledge. 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 for IDB teams. It also outlines that engagement with CSOs would be measured in terms of effectiveness, value-added, and contribution to knowledge of the social fabric.⁶² The action plan notes that the IDB Group – Civil Society Engagement Strategy needs to be integrated

58 EBRD (n 50).

59 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 6 February 2025).

60 IDB ‘IDB Group – Civil Society Engagement Strategy’ <https://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=EZSHARE-581988153-23> (accessed 6 February 2025).

61 IDB ‘Action Plan for Implementation of the IDB Group – Civil Society Engagement Strategy for Operations and Initiatives’ (2018) <https://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=EZSHARE-2116190867-64> (accessed 6 February 2025).

62 IDB (n 60).

with other policies to align incentives and reporting structures and calls for a fine-tuning of indicators and metrics.⁶³ In 2019, civil society established a working group on the IDB made up of more than 60 organisations, this includes the CHRD and the BIC.

The formalised Coalition has had some notable successes as is seen in the case study below:



David McBee

Case study: How a formalised CSO Coalition on the IDB has reformed Bank policy

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. Since the formation of the Coalition, the group has written letters to the IDB on numerous occasions advocating for greater inclusion – across its safeguards and access to information policies, as well as at its annual meetings. 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 as a panel discussion (for the first time in ten years), 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.⁶⁴

63 IDB (n 61).

64 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 6 February 2025).

NDB

The NDB does not have a civil society engagement framework. However, its first general strategy (2017-2021) notes that:

The Bank intends to engage with NGOs and benefit from their knowledge and experience ... while avoiding the introduction of politicized lending criteria and loss of flexibility and speed. Greater openness to NGOs, and more broadly to civil society, will encourage public discussion of the Bank's activities, improving the quality of its operations and enhancing institutional credibility. Partnerships with NGOs may, for instance, help NDB and its clients broaden their knowledge on how to embed sustainability criteria in infrastructure projects, taking into account local-level perspectives and sector-based standards.⁶⁵

The NDB's latest general strategy (2022-2026) states that it will strengthen institutional relationships with CSOs, while its approach to partnerships more broadly will be guided by a clear roadmap, with deliverables, modes of interaction, and work plans.⁶⁶ However, it is notable that CSOs were not included in the development of this strategy, despite requests for involvement.⁶⁷ The NDB's Corporate Communications Division handles CSO engagement with senior management. Civil society has engaged the NDB since its inception and formed the Civil Society Forum of the New Development Bank (CSF-NDB) in March 2018. In addition, CSOs have specifically engaged with the NDB's Africa Regional Centre (ARC). Civil society has also more broadly called for formalised engagement with BRICS countries through a Track 3 approach, known as Civil BRICS.⁶⁸ The group has also included the NDB as a topic during the Civil BRICS programme and in CSO declarations. Following the annual meeting in 2024, CSOs made recommendations for quarterly meetings and to provide adequate time for CSOs to plan and organise logistics for annual meeting attendance, to ensure that participation is meaningful, robust, accessible, diverse, inclusive, and held based on participatory agendas. CSOs have also called for more regular meetings between the NDB and CSOs, as this would provide opportunities to strengthen CSO meaningful engagement as per the 2022-2026 General Strategy. The CSF-NDB has primarily operated with South African civil society

65 NDB 'NDB's General Strategy: 2017-2021' 31 <https://www.ndb.int/wp-content/uploads/2017/08/NDB-Strategy.pdf> (accessed 6 February 2025).

66 NDB 'New Development Bank General Strategy for 2022-2026' p 27 https://www.ndb.int/wp-content/uploads/2022/07/NDB_StrategyDocument_Eversion-1.pdf (accessed 6 February 2025).

67 Personal communication with CSF-NDB.

68 Afrodad 'Civil BRICS (Brazil-Russia-India-China and South Africa) Policy Recommendations Submitted for consideration by the official BRICS Summit to be held in South Africa on 25-27 July 2018' (2018) <https://www.afrodad.org/sites/default/files/publications/Civil-BRICS-Policy-Recommendations.pdf> (accessed 6 February 2025).

members, and some regional members, such as Afrodad, African Monitor, the Economic Justice Network, and the Lesotho Seingoli Legal Centre.

WB

The WB's Strategic Framework for Mainstreaming Citizen Engagement (CE) was developed in 2014 and is guided by five principles: 1) it is results-focused; 2) it involves engaging throughout the operational cycle; 3) it seeks to strengthen country systems; 4) it is context-specific; and 5) it is gradual.⁶⁹ The Framework details how citizens can play a role in different areas, including in the Systematic Country Diagnostic (SCD), which is used to develop the Country Partnership Framework (CPF) and complements the government's national development plan and other donor plans to determine country priorities, the CPF itself, Policy Dialogue, Development Policy Lending, Beneficiary Feedback: Citizen Engagement in Investment Project Financing, and its Programme-for-Results. It also suggests how CSOs can be engaged in advisory services and analytics, and grant programmes. The Framework also notes how CSOs can be engaged through the IFC and MIGA.

In 2024, the WB began its IDA21 replenishment process (its periodic fundraising effort to support highly concessional lending and grants). The WB also finalised its Evolution Roadmap, a plan outlining intended reforms to better address current global challenges like climate change, pandemics, and fragility by evolving its mission, operations, and resource allocation more effectively. In both processes, the WB stressed the importance of civil society engagement. During April and July 2024, the WB held one global and eight regional IDA Forums with more than 800 organisations represented globally. Organisations engaged on the IDA21 strategic directions and policy framework and proposed measures, on the issue of debt, and on shrinking civic space.⁷⁰ The WB now intends to draft a successor of the 2014 CE Strategic Framework and an operational plan to support regions in strengthening the implementation of portfolio-level approaches to strengthening country systems for civic and citizen engagement.⁷¹

69 World Bank 'Strategic Framework for Mainstreaming Citizen Engagement in World Bank Group Operations' (2014) <https://openknowledge.worldbank.org/entities/publication/7da5be74-e363-5d09-84eb-7517a3828dc8> (accessed 6 February 2025).

70 International Development Association 'Report from the Executive Directors of the International Development Association to the Board of Governors: Ending poverty on a livable planet – Delivering impact with urgency and ambition. Draft for comments'. Obtained through personal communication with the WB.

71 As above.



Case study: The WB's efforts to measure CSOs in its results-framework

The WB's Strategic Framework for Mainstreaming Citizen Engagement emphasises systematic monitoring and reporting on citizen engagement activities within WB-supported operations, aiming for a more results-focused approach. These efforts have had some positive impact – in 2018, a report by the WB's Independent Evaluation Group found that mainstreaming Citizen Engagement (CE) had improved its prominence, but that the tracking of compliance was limited to minimum standards, and the feedback given was not monitored or tracked.⁷² As an external assessment has confirmed, WB staff in favour of the CE agenda were hampered by time and financial constraints, and the absence of reliable, dedicated funding for CE monitoring and follow-up support. There was also limited strategic coordination between the CE agenda and the WB's ESF.⁷³

Then in 2023, the WB undertook a strategic review of ten years of citizen engagement and social accountability (CESA).⁷⁴ While the review was shared for this report and the report involved some consultation with CSOs to develop the key findings, some CSOs have raised concerns that the review is not published online or widely available.⁷⁵ The review found that the WB had succeeded in meeting the corporate requirements of citizen

72 World Bank Group 'The Evolution of Citizen Engagement Activities in the World Bank Group' (2018) <https://ieg.worldbankgroup.org/evaluations/engaging-citizens-better-development-results> (accessed 6 February 2025).

73 Accountability Research Centre 'How do World Bank staff perceive the institutional environment for building citizen engagement into projects?' (2021) <https://accountabilityresearch.org/publication/how-do-world-bank-staff-perceive-the-institutional-environment-for-building-citizen-engagement-into-projects/> (accessed 6 February 2025).

74 Malena (n 15).

75 R Nadelman 'Is the WB rolling back commitments to citizen engagement, again?' (2024) <https://www.brettonwoodsproject.org/2024/07/is-the-world-bank-rolling-back-commitments-to-citizen-and-civil-society-engagement-again/> (accessed 6 February 2025).

engagement but that this did not represent an adequate benchmark for meaningful and impactful engagement.⁷⁶ It found the need for a more strategic, systems-oriented, and partnership-based approach and made recommendations to improve the quality and outcomes of project-level CES, strengthen country systems for CESA, support enabling conditions for CESA, and ensure an institutional support system for CESA that is fit for purpose. These are expanded upon later. At the institutional level, however, it is worth noting that the review suggests, among others, updating and expanding operational guidance on CESA, strengthening country engagement, increasing learning and capacity development opportunities, and enhancing funding for CESA.

In April 2024, the WB released its new Corporate Scorecard that tracks results against 22 indicators – a fraction of the 150 indicators that it used to use. The WB claims that the new scorecard provides a streamlined, clear picture of progress, but CSOs highlighted the fact that an indicator of civic engagement had been omitted.⁷⁷ CSOs also expressed worries that the WB is backtracking on its commitments to enhance citizen engagement, relying primarily on its Environmental and Social Framework (ESF) to foster CSO engagement. As CSOs point out, the ESF is a risk tool and does little to foster agency in project relevance and outcomes.⁷⁸ A group of CSOs then called on the WB to add a ‘Quality of Citizen Engagement and Social Accountability’ indicator to the scorecard.⁷⁹ They further questioned the Bank’s measurement of poverty reduction rather than economic transformation, its measurement of gender, as its assessment of equitable and ecologically sustainable outcomes.⁸⁰

As a result of these engagements, the WB’s Scorecard now includes an indicator for ‘Quality of civic and citizen engagement’, added to the Organisational Effectiveness and Efficiency Dashboard. The new indicator differs from the past indicator by bridging the project and country levels (rather than a sole focus on the project level).⁸¹ CSOs have, however, continued to question the absence of indicators to track the negative impacts

76 Malena (n 15).

77 Balkan Civil Society Development Network ‘A call to the WB for inclusion of a civic engagement indicator in the Corporate Scorecard’ (2024) <https://balkancsd.net/a-call-to-the-world-bank-for-inclusion-of-a-civic-engagement-indicator-in-the-corporate-scorecard/> (accessed 6 February 2025).

78 Nadelman (n 75).

79 As above.

80 Bretton Woods Project ‘New WB Corporate Scorecard: Overlooking client priorities and ignoring development impact’ (2024) https://www.brettonwoodsproject.org/2024/10/new-world-bank-corporate-scorecard-overlooking-client-priorities-and-ignoring-development-impact/?utm_source=emailmarketing&utm_medium=email&utm_campaign=observer__autumn_2024_out_now&utm_content=2024-10-17 (accessed 6 February 2025).

81 International Development Association (n 70).

of projects and how/whether these impacts have been addressed. This indicator would include details on the complaints filed to the institution's IAMS, corporate grievance mechanisms, and project-level grievance mechanisms, and would also capture how these grievances and concerns have been addressed.⁸² CSOs claim that such accountability is necessary to internalise, integrate, and learn from past work.

In 2012, the WB formed the multi-donor trust fund, the Global Partnership for Social Accountability (GPSA). The GPSA is a dedicated grant-financing and capacity-building trust fund for civil society organisations.⁸³ In 2025, the WB will launch the GPSA's successor facility, CIVIC: The Civil Society and Social Innovation Alliance as a dedicated new facility to systematise and transform the WBG's engagement with civil society by providing technical assistance to WBG operational teams and direct financing to CSOs and other social economy actors to drive equity and take innovative solutions to scale. The GPSA's Green Accountability Platform is currently demonstrating the proof of concept and promise of CIVIC. Green Accountability is working through a consortium of leading CSO networks in the Global South (Huairou Commission, a network of 5 000+ women-led Southern CSOs, and South-South North – an expert partner in capacity building and communities of practice) and World Resources Institute (WRI) to channel financing from the global to the local level and vertically integrate citizen views and community-driven solutions into national policies and programmes to combat climate change and integrate transparency, accountability, and participation in climate finance.⁸⁴

The WB's NGO-WB committee was first formed in 1982, but civil society continued to demand more substantive engagement, and this has since developed. The WB has a small team dedicated to CSO engagement at HQ and external affairs officers in client countries are responsible for engagement at the country level.⁸⁵ The Civil Society Policy Forum (CSPF) is held alongside the Spring (April) and Annual (October) IMF-World Bank Group meetings.⁸⁶ The CSPF Working Group is an elected group of CSO representatives that serve as a civil society interlocutor with the WBG

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- 82 S Amoako 'Missing in action: Accountability is noticeably absent from the WB Group's new Corporate Scorecard' <https://www.brettonwoodsproject.org/2024/12/missing-in-action-accountability-is-noticeably-absent-from-the-world-bank-groups-new-corporate-scorecard/> (accessed 6 February 2025).
- 83 WB 'Global Partnership for Social Accountability (GPSA)' <https://thegpsa.org/> (accessed 6 February 2025).
- 84 WB 'Green Accountability Initiative' <https://thegpsa.org/greenaccountability/#civic> (accessed 6 February 2025).
- 85 Nadelman (n 75).
- 86 World Bank 'Civil Society Policy Forum: Annual Meetings 2024' <https://www.worldbank.org/en/events/2024/06/26/civil-society-policy-forum-annual-meetings-2024> (accessed 6 February 2025).

and IMF civil society teams (note that they are only the CSO interlocutors for the annual meetings and not for other broader engagements). This working group has a two-year mandate.⁸⁷ CSPF sessions are launched through an open call for proposals, which the WB and the IMF organise for review, and which are then selected by a group of eight CSO representatives, based on relevance, timeliness, partnership, and strength. The WB also holds monthly meetings with CSOs, which CSOs can attend by sending an email to the Civil Society Policy team, and produces a monthly newsletter targeted to CSOs.⁸⁸ Direct engagement with the Board happens at the Spring and Annual Meetings and the President holds a townhall with CSOs at the Annual Meetings.

4.4 Summary and recommendations on PDB-CSO frameworks

Good practices based on key findings

- **Establishment of a PDB-CSO focal point** within each PDB.
- **CSO engagement framework in place**, which details the types of engagement that CSOs can have with PDBs (across the project, country/ regional, and international levels), the scope, process, and timeframes for meeting, and measures for M&E.
- **Development of indicators of the effectiveness and quality of engagement** of CSO and citizen engagement and align these to staff incentive structures.
- **Description of the value-added of engaging CSOs as contractors**, in terms of establishing social capital, and as a social accountability mechanism in CSO frameworks.
- **Establishment of diverse and representative CSO committees** for regular engagements with PDBs.
- **Development of CSO stakeholder engagement frameworks.**
- **Provision of sensitisation and capacity support for internal PDB staff**, as well as CSOs, to learn about how engagement can be more meaningful.
- **Review of CSO case studies** on the impact of projects on communities with a view to internal learning.

87 World Bank 'Civil society' <https://www.worldbank.org/en/about/partners/civil-society/civil-society-policy-forum> (accessed 6 February 2025).

88 As above.

As seen above, five of the seven PDBs surveyed have specific CSO engagement frameworks. This has facilitated engagement between CSOs and PDBs but differs according to how NGOs are perceived and engaged. For example, the ADB primarily sees NGOs as contractors. In contrast, the EBRD sees CSOs as the building blocks of multiparty democracy and emphasises the importance of developing a safe, open civic space. The EBRD also speaks to the role of CSOs in facilitating greater engagement in political, social, and governance reforms. Thus, these PDBs assess 'meaningful' CSO engagement from different standpoints. The WB's Framework is comprehensive, specifying that it will engage CSOs from the project design stage (when engaging with countries on their SCD and CPF, across policies and projects), but CSOs have alleged that it bases this engagement on minimum standards and has no mechanism for following up. The methodology for its new Corporate Scorecard now includes an indicator on 'Quality of citizen and civic engagement' as a result of CSO advocacy, but lacks indicators on the negative impact of projects, which limits the potential to learn from past mistakes. The IDB has included mechanisms for CSO engagement in its latest CSO strategy and action plan and measures meaningful engagement as effectiveness, value-added, and contribution to knowledge of the social fabric, but may be too early to tell how appropriate its use of indicators is. For the EBRD, the value-added by CSOs is seen in terms of social capital, and as experts that can feed into policy processes and projects. It is also noteworthy that the EBRD specifies that it will move from a reactive towards a proactive approach with CSO engagement. The EBRD has committed to developing guidance on CSO engagement that can be used by both civil society and EBRD officials, which officials from other PDBs could potentially use to develop their own guidelines. The need for clearer guidelines and M&E frameworks has been raised as issues for the AfDB. At the AIIB and the NDB, CSOs have requested a more formalised engagement. In institutions where no formalised engagement mechanism existed, CSO networks have formed coalitions to engage these PDBs – for example, the NGO Forum was established to monitor the workings of the ADB, which has grown to also encompass the AIIB. The AfDB has recently revitalised its CSO committee, which CSOs previously alleged was not representative, while the EBRD also has a civil society committee to facilitate engagements.

The following recommendations are made:

For PDBs

- **Develop a formalised PDB-CSO engagement strategy** if this does not exist, building on existing efforts from PDBs.
- **Ensure that PDB-CSO engagement frameworks (or respective guidelines) detail the types of engagement that CSOs can have with PDBs** (across the project, country/regional, and international levels), the scope, process, and timeframes for meeting, and measures for M&E.
- **Develop measures of meaningful engagement with CSOs**, in close consultation with these CSOs, and develop incentive structures for PDB officials in terms of CSO engagement.
- **Assess civic space in country frameworks and engage with CSOs** on the impact of this on PDB decisions and projects.
- **Train PDB officials on the value-added by civil society and build their capacity to engage CSOs.** This should go beyond the risks of failing to do due diligence, to their potential to build trust and social capital.
- **Ensure that engagements with CSOs are meaningful, accessible, and held based on participatory agendas.** This also means providing CSOs with adequate time to organise ahead of meetings and ensuring there are no challenges to CSO attendance in specific countries.

For CSOs

- **Develop formalised networks and focal points for engagement**, where these don't exist.
- **Provide inputs to PDBs on the value-added of CSO engagement** and the different areas in which CSOs can engage, as well as what meaningful engagement means for CSOs.
- **Document case studies to highlight where CSO engagement with PDBs has led to better developmental outcomes.**
- **Assess existing guidelines on consultation from PDBs for CSO engagement** to highlight good practices and suggest improvements where needed.
- **Develop and share CSO databases among CSO coalitions and PDBs on thematic issues** and proactively provide PDB focal points with CSO databases to ensure that consultations are diverse and inclusive.
- **Raise awareness among PDBs on shrinking civic space in parts of the world.**
- **Build capacity for engaging PDBs** among communities and local/national CSOs.



5 PDB-CSO engagement across project, country and international levels

5.1 Overview of PDB-CSO engagement across project, country and international levels

Ideally, CSOs should be engaged throughout the project, country and regional/international level. This section analyses CSO engagement with the seven PDBs across each of these levels. Table 2 provides an overview of this engagement.

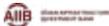
Table 2: Overview of PDB-CSO engagement at the project, country and regional/international level

ADB  ASIAN DEVELOPMENT BANK

Project	Country	Regional/International
CSOs engaged as contractors through the NGO framework. CSOs have raised project issues at annual meetings and through advocacy. The NGOC issues annual reports that consider meaningful engagement with civil society (operational level). Engagement with the AM has been challenging due to eligibility requirements. Additionally, CSOs are concerned with structural independence.	CSOs invited to engage more recently on country strategies. Dependent on country.	Specific CSO panel at annual meetings, meetings with ADB management, learning with partners panels. CSOs have raised issue of shrinking civic space.

AfDB 

Project	Country	Regional/International
CSOs more recently contracted to implement projects but limited. Less engagement in project design and monitoring. CSOs have submitted various complaints to the IRM, which has resulted in various recommendations issued to the client, but victims lack remedy, which is limited by using country systems.	CSOs invited to engage more recently on country strategies. Dependent on country.	No specific panel for CSOs at annual meetings, problematic attendance.

AIIB 

Project	Country	Regional/International
Lacks meaningful engagement at the project-level and no guidelines for this. Its IAM (the PPM) has restrictions on eligibility.	No country offices. No engagement at country level.	Engagement at annual meetings but limited.

Project

EBRD's CSCEF makes provision for using the EBRD's technical funds for training and support to CSOs (operational collaboration). Its new approach to civil society highlights the importance engaging on specific projects at the working level. IPAM's policy is largely in line with good practice and ensures a meaningful process for drafting management action plans. Ensuring remedy for harms is still a challenge, however.

Country

The Civil Society Steering Committee supports consultations on country strategies.

Regional/International

The Civil Society Steering Committee helps to prepare the Civil Society Programme at EBRD Annual Meetings.

Project

Engagements on projects previously limited due to absence of guidelines, frameworks and metrics. Civil society strategy aims to strengthen the Civil Society and Institutional Capacity Training Programme and to pilot projects to generate knowledge and data on the value added of citizen participation. MICI has eligibility issues. Some wins in MICI making recommendations for remedy and exit plans.

Country

Strategy identifies ConSocs are a key tool for engagement at country level, but these need to be strengthened in terms of participation and representation. The Action Plan commits to developing a communication strategy on IDB group sector and country good practices with civil society.

Regional/International

Specific CSO panel instituted alongside annual meetings in 2024.

Project

CSOs have not been involved in project design and implementation. The CSF of the NDB has been monitoring projects (Medupi Coal-Fired Power Station and Lesotho Highlands Water Project) to illustrate the challenges. NDB is in the process of creating an AM.

Country

NDB relies on national strategies for guidance. Good engagement with the ARC at country/regional level.

Regional/International

The NDB arranged a business lunch for CSOs during the 2019 and 2024 annual meetings.

Project

CSOs engaged at the operational level. Some MOUs with NGOs. Citizen engagement will be measured in new Corporate Scorecard. CSOs have recommended that the Inspection Panel be given more monitoring powers, power to recommend project suspension and recommendations on remedy. The IFC has consulted on an approach to remedial action

CSOs are directly financed via the Global Partnership for Social Accountability (GPSA)

Country

CSOs have been engaged in CPF, SCD and Country Economic Updates.

Regional/International

CSOs involved alongside the annual meetings through the Civil Society Policy Forum, arranged by the CSPF Working Group.

CSOs are regularly consulted by the WB Citizen Engagement Working Group.

5.2 Project-level

5.2.1 Project-level analysis

At the project level, CSOs can engage PDBs in project design, implementation, and monitoring, by engaging communities on projects, or by supporting communities to lay complaints at country-level or bank-level grievance mechanisms. Many organisations advocate for building an evidence base of projects that have resulted in negative consequences, as this represents an opportunity to demonstrate to Bank officials and shareholders that it is more cost-efficient to invest in proper due diligence to avoid risks before projects are implemented. However, CSOs should ideally be engaged in project design as this can allow more human rights-focused and people-centred approaches. CSOs have also engaged PDBs on the environmental and social safeguards associated with projects, citing the challenges of country systems. Some of these efforts are also documented later under the section on PDB-CSO engagement on policies.

One of the real risks associated with CSO engagement at the project level pertains to reprisals. A study by the Coalition for Human Rights in Development, ‘Misplaced trust: Why Development Banks should not rely on their clients to address reprisal risks’ looked at reprisals in the context of development projects and found that, in most cases, the client plays a direct role in these attacks, as they prioritise money over meaningful consultation and avoid disclosing possible risks. In repressive contexts, clients can even take advantage of silencing dissent through state agencies.⁸⁹ This is further detailed later in the context of CSO engagement with safeguards policies. The issue of reprisals is also illustrated across the case studies documented across the PDBs analysed in this report below, with IAMs often validating these serious concerns.

89 Coalition for Human Rights in Development ‘Misplaced trust: Why Development Banks should not rely on their clients to address reprisal risks’ <https://rightsindevelopment.org/misplaced-trust/> (accessed 6 February 2025).

ADB

The ADB's NGO policy makes provision for engaging CSOs in projects as contractors, as mentioned earlier. The ADB has issued reports since 2016, which highlight its cooperation and 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.⁹⁰

Sanjog Manadhar - climate activists in Nepal



Case study: The ADB's approach to meaningful engagement with CSOs at the project level

The ADB's report on *Cooperation with Civil Society 2023* details how it uses its new indicator for meaningful engagement with CSOs.⁹¹ It outlines four approaches to participation: 1) information generation and sharing; 2) consultation; 3) collaboration; and 4) partnership, showing a depth of engagement between low, medium, and high. Planned, meaningful engagement is detailed in Table 3 below. In 2023, 43 projects (59 per cent) included planned meaningful CSO engagement. Of these 43 projects, 36 or 84 per cent delivered meaningful CSO engagement. The report also documents how CSOs have contributed to achieving the ADB's strategic priorities, giving specific project examples across these priorities.

90 ADB (n 35).

91 ADB (n 30).

Table 3: The ADB’s indicators of planned, meaningful engagement across its approaches⁹²

Approach	Definition	Project processing	Project implementation
Information Generation and Sharing	Information is generated by ADB/recipient/client and shared with CSOs; independently generated by CSOs and shared with ADB/recipient/client; or jointly produced.	Joint generation and sharing of information to meet shared objectives (eg, improved understanding).	Joint generation and sharing of information to meet shared objectives (eg, improved understanding).
Consultation	CSO input is requested and considered as part of an inclusive policy, programme, or project decision-making process.	Views of CSOs incorporated into design (eg, use participatory methods).	Regular feedback from CSOs integrated during implementation (eg, use participatory methods).
Collaboration	CSOs and ADB/ recipient/client work jointly, but CSOs have limited control over decision-making and resources.	CSO influence on project design body and agreement of role for CSOs in project implementation.	Significant CSO representation on project implementation body and participation in implementation activities.
Partnership	CSOs participate in decision-making process and/or exert control over resources through a formal or informal agreement to work together toward common objectives.	MOU or partnership agreement negotiated, including cofinancing and management; or CSOs assume high level of ownership or responsibility.	MOU or partnership agreement implemented, including financing and management; or CSOs assume high level of ownership or responsibility.

In terms of engaging with the ADB’s Accountability Mechanism (AM), redress for affected communities at the ADB has been slow and limited. In part, this was because of challenges of monitoring, and a lack of capacity and diverse policy frameworks.⁹³ The ADB now has a webpage that gives a quick breakdown of complaints received by the compliance review panel, which shows that in 2021, three complaints were found ineligible and two were withdrawn. In 2023, one complaint was found to be ineligible.⁹⁴

92 The full table detailing engagement across different levels can be found on p 26 of the ADB’s 2023 annual report. See ADB (n 30).

93 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 6 February 2025).

94 ADB ‘Accountability Mechanism’ <https://www.adb.org/who-we-are/accountability-mechanism/compliance-review-function> (accessed 6 February 2025).

CSOs have offered critiques of the AM. Accountability Counsel notes that the ADB's mechanism is 'woefully behind good practice and needs to reform urgently'. They noted that they have benchmarked the ADB's AM Policy against its sister institutions to demonstrate how ADB can be better aligned to good practice.⁹⁵ Some of its fundamental shortcomings are:

- **ADB's Office of Special Project Facilitator** is not independent of 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 before board approval.

Accountability Counsel also submitted recommendations regarding the AM to the ADB's Board of Directors.⁹⁶ They argued that the ADB's eligibility criteria were problematic as this required prior good faith engagement with management. Many communities fear reprisals from Bank actors that are engaged in environmental and social harm. Additionally, communities' right to representation is limited because they are limited on who can advise them.

The NGO FORUM claims that project-level grievance mechanisms at the ADB 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 remedies. Currently, the AM Policy (paragraph 144) states that engaging with project-level grievance mechanisms is not a requirement for approaching the mechanisms, but that it is encouraged.⁹⁷ The FORUM therefore demands that the AM policy should explicitly state that engaging with local grievance mechanisms is not be a pre-requisite for engaging with the AM.⁹⁸ The challenge of achieving remedy has led to the FORUM leading a campaign that the ADB should be stripped of immunity, citing instances of cases filed in domestic courts for

95 Accountability Counsel 'Asian Development Bank' <https://www.accountabilitycounsel.org/institution/asian-development-bank/#our-advocacy> (accessed 6 February 2025).

96 Accountability Counsel 'Reforms needed at the ADB's Accountability Mechanism' (2024) <https://www.accountabilitycounsel.org/wp-content/uploads/june-2024-reforms-needed-at-adbs-accountability-mechanism-1.pdf> (accessed 6 February 2025).

97 ADB 'Accountability Mechanism Policy' (2012) <https://www.adb.org/documents/accountability-mechanism-policy-2012> (accessed 6 February 2025).

98 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 6 February 2025).

the IFC.⁹⁹ CSOs also noted that the ADB's AM will fail because closing civic space will allow for more cases of reprisals for those who speak out.¹⁰⁰

AfDB

At the AfDB, CSOs have not meaningfully engaged in project design and communities have therefore resorted to engaging the AfDB's Independent Recourse Mechanism (IRM) based on projects being implemented without meaningful consultation and consent (as seen below). However, there has been some progress in providing funding to CSOs to implement projects, which is positive in promoting local ownership and sustainability. For example, in Sudan, the AfDB awarded Zenab for Women in Development Africa climate change funding to establish a crop-seed income diversification model by building the resilience of 200 women smallholder farmers and 100 youth aged 15-34 (50 male: 50 female) through clean energy (solar), greater agricultural productivity and enhanced economic diversification. This project is intended to benefit 1 400 farm family members and demonstrate a good practice that can be used to improve climate resilience of other smallholder farmers across Sudan in the long term.¹⁰¹ This project illustrates the cost-saving benefits of using CSOs, as a project directed at 300 women and youth, it had implications for improving the lives of 1 400 farm members. Nevertheless, while this engagement is positive, CSOs should be consulted more directly at the project preparation stage.

Failing to adequately consult communities can mean that PDBs are required to invest extra time and money at the later stage of recourse. On 28 March 2024, the AfDB's IRM released two reports of two separate cases (the Multinational Lakes Edward and Albert Integrated Fisheries and Water Resources Management Project, or LEAF, and the Wadelai Irrigation Scheme) 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. One of these case studies is detailed below.

99 NGO Forum on ADB 'Does ADB's accountability Mechanism work?' <https://www.forum-adb.org/post/does-adb-s-accountability-mechanism-work> (accessed 6 February 2025).

100 Coalition for Human Rights in Development 'From the streets to the halls: Calls to protect civic space echoed in the ADB annual meeting' (2024) <https://rightsindevelopment.org/news/adb-annual-meeting-civic-space-georgia/> (accessed 6 February 2025).

101 AfDB 'Building climate resilience through youth and women farmers' <https://cse.afdb.org/en/node/79> (accessed 6 February 2025).



Case study: The AfDB's Multinational Lakes Edward and Albert Integrated Fisheries and Water Resources Management Project

The 'Lakes Edward and Albert Integrated Fisheries and Water Resources Management Project (LEAF)' was approved in 2015 and closed in 2021. The project aimed to reduce poverty, improve access to sustainable livelihoods for local fishing communities, and ensure sustainable management of natural resources. However, a crackdown by the Uganda People's Defence Forces (UPDF) resulted in the destruction of fishing equipment, boats, and houses under the pretext of cracking down on illegal fishing. Several fishermen were shot trying to escape attacks, while there were also reports of gender-based violence and sexual violence. In October 2021, a Ugandan CSO, the Twerwaneho Listeners' Club (TLC), submitted a complaint to the IRM on behalf of the community after numerous attempts to engage the AfDB management, which was found eligible.

The IRM released a compliance report in July 2023 noting that the project had lacked meaningful and transparent consultation with affected communities, including women, and that the Bank did not ensure broad community support. It had also failed to adhere to Environmental and Social Frameworks or disclose these project documents. Moreover, the compliance report found that the project had resulted in the loss of income and livelihoods and that the grievance management system was not working. It also failed to consider the gender aspects of the project. On the use of force and retaliation, it found the use of excessive force without due diligence. Of note, it strongly encouraged an independent mechanism to investigate these allegations or for the matter to be referred to an appropriate mechanism with the authority to investigate, such as the National Ugandan Human Rights Commission (UHRC). The matter has subsequently been referred to the UHRC, but CSOs have raised questions over the UHRC's independence and inaction. The IRM confirmed that the AfDB has the responsibility to find a remedy for victims of the

project – which was unlikely as the LEAF project was already closed – and urged the AfDB to direct management to ensure appropriate redress.¹⁰²

Although this case was successful in acknowledging the rights of the victims and in raising awareness of how countries do not always uphold the standards set by the PDB, or by international good practices, it also illustrates the limitations of these measures, since the effectiveness of an IAM is limited by management’s ability to compel action or to provide remedy from the client.¹⁰³ It also illustrates that putting the responsibility on the borrowing country, particularly in authoritarian settings, limits victims’ rights to remedial action.

Civil society has therefore made submissions to the AfDB that project-level grievance mechanisms should not remain the sole responsibility of the borrower. It urged that the mechanism should be disclosed to local communities before project appraisal, that the AfDB should ensure the legal and physical safety of those facing retaliation, and that the AfDB should ensure that the project-level grievance mechanism is managed by independent personnel with no ties to the project to be more independent.¹⁰⁴ It also noted that AfDB’s safeguards framework should explicitly require the Borrower to provide multiple accessible means for stakeholders to access and use this mechanism (that is, 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.¹⁰⁵ It should also enable remedy in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs).

102 See Coalition for Human Rights in Development ‘A step towards justice: AfDB Accountability Mechanism’s report confirms human rights violations in two projects in Uganda’ <https://rightsindevelopment.org/news/a-step-towards-justice-accountability-mechanisms-report-confirms-human-rights-violations-in-two-african-development-bank-projects-in-uganda/> (accessed 6 February 2025). IRM ‘Lakes Edward and Albert Integrated Fisheries and Water Resources Management Project (LEAF)’ <https://t.co/sg9f6O8gp3> (accessed 6 February 2025); AfDB ‘Management Response to the Compliance Review Report of the Independent Review Mechanism Relating to Multinational: Lakes Edward and Albert Integrated Fisheries and Water Resources Management (LEAF II) (Complaint Number: RQ2021/4) AHAI/RDGE/SNSC’ <https://irm.afdb.org/sites/default/files/project-file/Final%20approved%20-%20Management%20Response%20-%20IRM%20Compliance%20Review%20Report%20-%20LEAF%20II%20Project%20002.pdf> (accessed 6 February 2025).

103 Coalition for Human Rights in Development (n 19).

104 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_recommendaat.pdf (accessed 6 February 2025).

105 As above.

AIIB

The AIIB notes that clients must conduct meaningful public consultation and stakeholder engagement during the project preparation and implementation stages.¹⁰⁶ However, the AIIB lacks guidelines for this and does not treat this as the norm.¹⁰⁷ More broadly, the AIIB has been criticised for lacking meaningful engagement with project-affected communities and local civil society, leading to a 'lack of trust and increased risk during project implementation'.¹⁰⁸ One of the biggest challenges raised by CSOs is that in 2018, the AIIB approved a proposal to delegate the power to approve projects by the Bank's management, rather than its Executive Board.¹⁰⁹ CSOs have noted that this threatens commitments to uphold international standards and good practices. The thresholds for delegation of projects are based on financial amounts and whether this is the first project in a sector or country, but CSOs have noted that this is not meaningful, and have called on the Board to make delegation the exception and not the norm. At a minimum, they have called for the riskiest projects to be considered by the Board, as well as those involving fossil fuels. These should also be screened against environmental and social standards and detailed on the website.¹¹⁰ Urgewald maintains a database, AIIB watch, which documents environmental and human rights conflicts arising from infrastructure projects financed by the AIIB. The database illustrates more than 30 cases where the AIIB has failed to meet its own safeguard standards.¹¹¹

106 AIIB 'Civil society engagement' <https://www.aiib.org/en/how-we-work/civil-society-engagement/overview/index.html> (accessed 6 February 2025).

107 X (Baker) Lu 'Increasing resilience by engaging civil society: Lessons Learned from International Financial Institutions' (2021) <https://www.saisperspectives.com/2021-issue/2021/2/1/increasing-resilience-through-civil-society-organisation-engagement-lessons-learned-from-international-financial-institutions> (accessed 6 February 2025).

108 Re-course (n 49).

109 Re-course 'Statement: CSOs call on AIIB Board to stop delegating project approvals' (2024) <https://re-course.org/newsupdates/csos-call-on-aiib-board-to-stop-delegating-project-approvals/> (accessed 6 February 2025).

110 As above.

111 Urgewald 'AIIB: Environmental and social track record' <https://www.urgewald.org/en/aiib-watch> (accessed 6 January 2025).



Case study: The Rogun Dam in Tajikistan

*In Tajikistan, several PDBs (led by the WB and including the AIIB and IDB) are coming together to finance the Rogun Dam. Civil society is concerned about numerous issues, the biggest of which is that 7 000 people have already been displaced by the project, while an estimated 43 000 additional people will need to be resettled once the project is complete. Tajikistan has spent US\$4 billion on the project already but needs US\$6.4 billion to finish it, which will put Tajikistan under fiscal pressure. It will also have a destructive environmental impact and is not climate friendly. According to CSOs, alternative renewable schemes based on solar, and wind could be built **five times faster and three times cheaper than Rogun dam**. There is also a high risk of corruption and no meaningful consultation. The Stakeholder Engagement Plan is inadequate.¹¹² CSOs have sent several letters to the PDBs involved. See for example [here](#). The NGO Forum on the ADB publishes the AIIB Observer, in which it has detailed the negative impacts of this project. On 2 October 2024, civil society met with AIIB officials at the 9th Annual meeting of the Board of Governors. Civil society has also published a [special booklet](#) on the project and a project monitoring [website](#).*

At the meeting with the Board of Governors, Jin Liqun, President of the AIIB, summed up the discussion between the public and bankers: 'I understand the concerns you raise, and I intend to approach the WB and the Government of Tajikistan to work together to find ways to reduce the negative impacts of the Rogun hydropower plant – or at least fully offset them. We cannot afford to build dams that are as destructive to nature and people as they were 30 years ago.'¹¹³

112 NGO Forum on the ADB 'Why development banks should not fund the Rogun mega-dam in Tajikistan, if they really care about people and the environment' *AIIB Observer* Vol 2 (2024) 2 <https://www.forum-adb.org/post/aiibobservervol2> (accessed 6 February 2025).

113 Rivers without Boundaries 'Civil society organisations and bankers discuss the Rogun HPP Project completion' (2024) <https://www.transrivers.org/2024/3955/> (accessed 6 September 2025).

The AIIB's Project-Affected People's Mechanism (PPM) came into effect on 31 March 2019. While CSOs have acknowledged that the AIIB is relatively young, concerns have been raised over the harm caused by its projects, with already five complaints submitted to the PPM (none of which have been accepted), and 34 complaints instituted with other MDBs for co-financed projects (which are not eligible under the PPM).¹¹⁴ CSOs have called the mechanism 'quasi-independent' and have raised issues of prohibitive entry barriers, exclusion from large parts of the AIIB's portfolio, and the lack of a community-oriented approach.¹¹⁵ It is currently being reviewed.¹¹⁶ CSOs have engaged on the PPM for years before and during this review, making various submissions.¹¹⁷ The inputs have advocated for the PPM to hear cases of co-financed projects, remove restrictions on parallel judicial or arbitral proceedings, and self-initiate investigations. CSOs have also been required to engage client-led grievance mechanisms before approaching the PPM, which is a challenge in restrictive civic space and are unable to choose their own representatives. There have also been challenges with retaliation. CSO inputs make recommendations on remedial action (noting that the PPM should be able to recommend remedial actions in the compliance review report and that management should commit to clear time-bound actions for returning AIIB to compliance and achieving remedy for affected communities), institutional learning, and the PPM's ability to recommend the suspension of projects.¹¹⁸

Rogun Dam water intake, Sosh



114 R Goyal '34 Civil Society Organisations submit joint recommendations on how to strengthen AIIB's Project-Affected People's Mechanism' *Accountability Counsel* 25 September 2024 <https://www.accountabilitycounsel.org/2024/09/34-civil-society-organisations-submit-joint-recommendations-on-how-to-strengthen-aiibs-project-affected-peoples-mechanism/> (accessed 6 September 2025).

115 As above.

116 AIIB 'Public consultations: AIIB'S PPM Policy Review' <https://www.aiib.org/en/how-we-work/public-consultations/project-affected-people-mechanism-policy-review/index.html> (accessed 6 February 2025).

117 For a historical view on these submissions see Accountability Council 'Asian Infrastructure Investment Bank (AIIB) | Project-Affected People's Mechanism (PPM)' <https://www.accountabilitycounsel.org/institution/asian-infrastructure-investment-bank-aiib-project-affect-peoples-mechanism-ppm/#documents> (accessed 6 February 2025).

118 Goyal (n 114).



Case study: Using project-based evidence and good practice to inform the AIIB's accountability review

The PPM was first established in 2017. At the time, the NGO Forum conducted sub-regional consultations on the PPM, learning from other sister institutions and international practices, and inviting the AIIB to do things differently. The NGO Forum also started monitoring projects on the ground. Of particular concern was the Bhola power plant in Bangladesh. Bangladesh Working Group on External Debt (BWGED) and CLEAN (Coastal Livelihood and Environmental Action Network) in collaboration with NGO Forum conducted studies on the socio-environmental impacts of the power plant along with potential violation of national and international standards. The NGO Forum and CLEAN filed a complaint in April 2022 and noted key concerns, namely lack of information disclosure and meaningful consultation, coercion, fraud and intimidation on land acquisition, and environmental impact and livelihood loss.¹¹⁹

The complaint was deemed ineligible because of article 5.1.8 of the PPM which states: 'The Requestors have not made good faith efforts to resolve the issues with the Project-level GRM and with Management, or have not indicated to the satisfaction of the PPM why they have been unable to do so.' However, as the NGO Forum observes, the affected communities have requested anonymity due to fear of retaliation, including land grabbing, which has been described in detail. According to the NGO Forum, 'this judgment of ineligibility clearly illustrates a deep lack of understanding of the local cultural, political, and economic context of the Bhola IPP project area by the PPM and CEIU'. Moreover, the PPM took ten months and 29 days to decide ineligibility, exceeding the 35-day limit as per the indicative timelines for submission processing under PPM Procedures. The NGO Forum therefore labelled

119 NGO Forum 'Cases' <https://www.forum-adb.org/aiib> (accessed 6 February 2025).

this case as 'what NOT to do' in cases of complaints reaching the PPM and labelling the PPM a failed system. A number of further recommendations were made in a submission to the AIIB, and it remains to be seen if these considerations will be considered under the current review.¹²⁰

EBRD

At the project level, the EBRD engages CSOs through the CSCEF, which has identified four thematic areas for intervention, namely transparency and good governance, sustainable energy and resources, gender and economic inclusion, and digital transition. The EBRD's CSCEF makes provision for using the EBRD's technical funds for training and support to civil society capacity in terms of technical knowledge, outreach and project management skills, governance, and organisational capacity. According to its new approach, between 2017 to 2020, the CSE team completed 31 technical cooperation projects worth a total of €7 million. Overall, 13 768 stakeholders and 661 civil society actors benefitted from the roadmap during that period.¹²¹

During consultations over the EBRD's AIP and ESP reviews in 2023 and 2024, which are discussed later, a joint submission by more than 60 CSOs called for the EBRD to proactively seek information from rights holders through regular site visits and engagement with community members, workers and other rights holders, and implement effective anti-retaliation measures to protect those who speak out.¹²² One CSO has also pointed out that EBRD investments in Ukraine in the agribusiness sector have contributed to the rise of large-scale agriculture companies that now monopolise the market, suggesting that this development has not been inclusive or a positive development for local communities and businesses.¹²³

The EBRD's new ESP requires its clients to meaningfully engage with communities and CSOs in all its projects as a key requirement.¹²⁴ In particular, Environmental and Social

120 NGO Forum on the ADB 'NGO Forum on ADB's Comments on the AIIB Project-affected People's Mechanism (PPM)' (1 August 2024) <https://www.forum-adb.org/post/ngo-forum-on-adb-s-comments-on-the-aiib-project-affected-people-s-mechanism-ppm> (accessed 6 February 2025).

121 EBRD (n 50).

122 'Civil society joint statement on the EBRD's draft safeguards' <https://bankwatch.org/wp-content/uploads/2024/05/Civil-society-joint-statement-on-the-EBRDs-draft-safeguards.pdf> (accessed 6 February 2025).

123 CEE Bankwatch Network 'Civil society urges the EBRD to adopt responsible policies and reaffirm its commitment to promoting democracy' (2024) https://bankwatch.org/press_release/civil-society-urges-the-ebrd-to-adopt-responsible-policies-and-reaffirm-its-commitment-to-promoting-democracy (accessed 6 February 2025).

124 EBRD 'Environmental and social policy' (2024) <https://www.ebrd.com/environmental-and-social-policy-esp-2024> (accessed 6 February 2025).

Requirement 10 spells out the nature of stakeholder engagement.¹²⁵ For high-risk projects, the EBRD's Environmental and Social team also engages directly with CSOs during the appraisal and monitoring process.

The EBRD's accountability mechanism, the Independent Project Accountability Mechanism (IPAM) was established in 2020 and replaced the Project Complaint Mechanism, which brings the mechanism largely in line with international practice. It also includes several positive provisions, such as those ensuring a meaningful process for drafting management action plans.¹²⁶ Some of the other major improvements included removing the accountability mechanism from the operational level of the Bank and having a no-tolerance position on retaliation. Information about IPAM complaints is now required to be considered before the EBRD makes any additional investments, and in addition to requiring regular monitoring reports, the IPAM policy explicitly allows the mechanism to report any implementation issues or outstanding issues of non-compliance to the Board.¹²⁷ In a CSO analysis of the EBRD's IPAM, the report found that IPAM's compatibility with human rights standards appeared to be on solid foundations and that it operated with a high level of independence.¹²⁸ However, the report states that complaints to IPAM are restricted to project-affected communities and organisations that have engaged project-affected communities who can explain why the project-affected communities are not submitting the complaint themselves. According to this CSO analysis, this limits NGOs working on environmental issues at local and national levels, where complaints can only be considered under IPAM's Compliance function. It also requires engagement with EBRD management or the client prior to accessing the mechanism, which can pose significant barriers. It should be noted the EBRD's ESP now stresses a zero-tolerance approach to retaliation, noting it will assess risks and work with clients to prevent retaliation

125 EBRD 'Environmental and social requirement 10: Stakeholder engagement' (2024) <https://www.ebrd.com/sites/Satellite?c=Content&cid=1395324228120&d=&pagename=EBRD%2FContent%2FDownloadDocument> (accessed 6 February 2025).

126 Accountability Counsel 'European Bank for Reconstruction and Development (EBRD) | Independent Project Accountability Mechanism (IPAM)' <https://www.accountabilitycounsel.org/institution/european-bank-for-reconstruction-and-development/> (accessed 6 February 2025).

127 Accountability Counsel, CEE Bankwatch Network & SOMO 'Press Release: European Development Bank significantly strengthens its grievance mechanism – Reformed mechanism now more independent' *Accountability Counsel* 9 May 2019 <https://www.accountabilitycounsel.org/2019/05/press-release-european-development-bank-significantly-strengthens-its-grievance-mechanism-reformed-mechanism-now-more-independent/> (accessed 6 February 2025).

128 CEE Bankwatch Network 'Holding the EIB and EBRD accountable: Are their grievance mechanisms effective?' (2024) <https://bankwatch.org/publication/holding-the-eib-and-ebrd-accountable-are-their-grievance-mechanisms-effective> (accessed 6 February 2025).

'taking into account the safety and security of the complainants as a matter of priority'.¹²⁹ The CSO analysis also states that IPAM's role in addressing power imbalances between parties, which reduces the capacity of rights holders to effectively participate in the problem-solving process, remains unclear. The report further finds that, despite a zero-tolerance approach to retaliation, the procedures for assessing these risks and implementing mitigation and remedial measures remain overly general and lacking in detail.

IDB

At the IDB, citizen participation in the design and execution of Bank activities and projects was highlighted in its past Strategy for promoting Citizen Participation. However, in 2016, an evaluation by the IDB found that only half of the civil society organisations surveyed were satisfied with IDB participation in public consultations for specific projects.¹³⁰ The IDB found that the lack of a common vision across the IDB, the absence of harmonised frameworks, and the lack of tools for systematisation of the IDB work with CSOs meant that this 'resulted in activities and initiatives with civil society being allocated resources in a piecemeal way without measurement criteria being followed to determine their effectiveness and thus losing sustainability and impact'.¹³¹ The IDB has subsequently made efforts to enhance CSO engagement through its new engagement strategy. Beyond a risk perspective, the IDB's civil society strategy notes the importance of civil society engagement for sustainability and social innovation and outcomes and commits to greater consultation in project design.¹³² The strategy now aims to strengthen the Civil Society and Institutional Capacity Training Programme and to pilot projects to generate knowledge and data on 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 offers to use analytical tools such as WeConnect to facilitate public opinion surveys.¹³³

The IDB's Independent Consultation and Investigation Mechanism is known by its Spanish acronym, MICI. However, the IDB has been accused of lacking transparency, which makes it hard for communities to engage with MICI. 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

129 CEE Bankwatch Network (n 128) 10.

130 IDB 'IDB External Feedback System 2016 Report' (2017) <https://publications.iadb.org/en/idb-external-feedback-system-2016-report> (accessed 6 February 2025).

131 IDB 'IDB Group-Civil Society: Engagement Review 2014-2015' (2016) <https://publications.iadb.org/en/idb-group-civil-society-engagement-review-2014-2015> (accessed 6 February 2025).

132 IDB (n 60).

133 As above.

cent of the cases such complaints originated from a lack of transparency and participation.¹³⁴

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.¹³⁵ In 2018, 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.¹³⁶ 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 published its evaluation report of MICI.¹³⁷ 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. In 2023, as the IDB began the process of developing its institutional strategy review, Accountability Counsel, which maintains a database of all complaints ever filed with the accountability offices of international financial institutions, released an article on how lessons from MICI cases inform the need to prioritise community impact.¹³⁸ Firstly, Accountability Counsel noted the IDB is not hearing the majority of harm reported from their projects, as only 20 per cent of complaints to MICI are eligible for review. CSOs argue that, for the IDB's strategy to succeed, it must know the

134 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 6 February 2025).

135 These submissions can be found at Accountability Counsel, Inter-American Development Bank (IDB) | Independent Consultation and Investigation Mechanism (MICI) 'Institutional documents' <https://accountabilitycounsel.org/institution/inter-american-development-bank/#documents> (accessed 6 February 2025).

136 Accountability Counsel 'Comments on the Draft Guidelines for the Consultation Phase and the Draft Terms of Reference for the Roster of Process Facilitation Experts' (2018) <https://www.accountabilitycounsel.org/wp-content/uploads/2019/02/3-22-2018-comments-on-draft-guidelines-and-tors-final.pdf> (accessed 6 February 2025).

137 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 6 February 2025).

138 Accountability Counsel 'How lessons from MICI cases can inform the IDB's strategy review' (2023) <https://www.accountabilitycounsel.org/2023/11/how-lessons-from-mici-cases-can-inform-idbs-strategy-review/> (accessed 6 February 2025).

issues its projects face. Secondly, the article notes that even when complaints are heard and substantiated, projects often lack remedy. The article also emphasises that the IDB can improve its financing by better predicting and preventing frequently raised harms (namely, consultation and disclosure, environmental and community health harms). To have a greater impact, the article urges the IDB to improve its efforts to listen to communities.

San Mateo Ixtatán, Guatemala / Simon Burchell



Case study: MICI calls for a responsible exit plan in an IDB hydro-electric project in Guatemala

In the municipality of San Mateo Ixtatán, northwestern Guatemala, IDB Invest provided US\$13 million to a company called Energía y Renovación SA to develop two hydro-electric dams. The local population, made up of mostly Indigenous communities, began peacefully protesting the project. The area had been heavily militarised and those opposing the development were subjected to various reprisals, including defamation, harassment, criminalisation, arbitrary detentions, shootings, torture and killings. The communities laid a complaint at the IDB's MICI in August 2018, supported by the InterAmerican Association for Environmental Defence (AIDA), the International Platform against Impunity, and the Plurinational Ancestral Government of the Akateko, Chuj, Q'anjob'al and Popti' Native Nations.

Three years later, MICI determined the Bank had violated numerous policies. The reasons included inadequately characterising the population, which denied the existence of Indigenous Peoples; failing to identify the gender-differentiated impacts on women; failing to ensure that the client made adequately identified and managed environmental impacts; failing to ensure that the communities were properly informed and consulted; and failing to carry out adequate monitoring of local conflict risks that could result from projects implementation. It made 29 recommendations for the project, including recommendations for the future. The IDB set a historical precedent in deciding

to withdraw from the project, while also designing a responsible exit plan.¹³⁹ The action plan proposed establishes that IDB Invest will create a transition plan translated into the native languages of the affected communities, as well as a gender-differentiated impact assessment, and an investment to promote financial inclusion and women's empowerment in the area. It also contains actions to strengthen the environmental and social safeguards unit of IDB Invest in the area of Indigenous Peoples, as well as to establish a zero-tolerance policy for gender-based violence. The case study illustrates how a project complaint can lead to policy change. However, concrete remedies for the community are yet to be enacted and show the limitations of IAMS.



San Mateo Ixtatán, Guatemala / Simon Burchell

NDB

CSOs have not been involved in project monitoring, design, and implementation at the NDB. However, in 2021, the CSF of the NDB made a strategic decision to start monitoring projects. In terms of project monitoring, the CSF-NDB has examined the Medupi Coal project and Phase II of the Lesotho Highlands Water Project (LHWP). Afrodad also developed a paper on 'The Role of the NDB's Regional Office in Facilitating BRICS Finance in Africa', focusing on the NDB in the SADC region and using the LHWP Phase II as a case study.¹⁴⁰ At the launch of the paper, the group engaged the Seinoli Legal Centre (SLC), and together the CSF-NDB has continued to demonstrate the challenges of country systems.

139 AIDA 'Indigenous victory as development bank withdraws investment and drafts exit plan following rights violation in Guatemala' (2022) <https://aida-americas.org/en/press/indigenous-victory-as-development-bank-withdraws-investment-and-drafts-exit-plan> (accessed 6 February 2025). In Coalition for Human Rights in Development 'Wearing blinders: How banks are ignoring reprisal risks' (2023) <https://rightsindevelopment.org/wearing-blindens/> (accessed 6 February 2025).

140 Afrodad 'The role of the New Development Bank's regional office in facilitating BRICS finance in Africa' (2022) <https://afrodad.org/sites/default/files/publications/The-Role-of-the-New-Development-Bank-Africa-Regional-Center-in-Facilitating-BRICS-Finance-in-Africa.pdf> (accessed 6 February 2025).



Case study: *The challenges of country systems at the NDB*

The CSF of the NDB has raised the challenges associated with using country systems at the NDB, citing their engagements with communities affected by the LHWP and the Medupi coal station. The LHWP has had severe socio-economic, cultural, and environmental repercussions on host communities. Women and girls have faced challenges concerning gender-based violence, have been excluded from consultations, and have not been considered in resettlement plans. There has also been inadequate compensation without any basis in law, and community assets have been expropriated without compensation. There is no accountability mechanism at the NDB yet, and so these victims have no recourse. The SLC, together with the CSF of the NDB, is advocating for the Lesotho Highlands Development Authority (LHDA) to develop a gender and safeguarding strategy and will continue advocacy with the Parliament of South Africa and the Kingdom of Lesotho, as well as with NDB and AfDB on the impact of projects on communities and safeguarding policies, as well as access to information. The CSF-NDB has also focused on the impact of the Medupi Coal Station pollution on community health. Access to information in Lesotho is tricky as no law promotes this access, and project information from the NDB is not available to the public. The NDB states that the information resides with Lesotho, while Eskom has applied (and succeeded) in getting the National Consultative Advisory Forum in South Africa to consider it exempt from complying with minimum emission standards, thus abdicating responsibility. The NDB website now says that the loan, intended to install this new technology, has expired.¹⁴¹

As early as 2017, BRICS CSOs raised the issue of country systems at the NDB, noting in their analysis that the NDB does not set forth the criteria or processes by which these systems will be evaluated. The ESF states that NDB conducts environmental and social

141 Report of the CSF-NDB's annual meeting 'Personal communication with the CSF-NDB' (2024).

due diligence reviews and that the NDB will apply, on a project-by-project basis, an appropriate risk-based framework, but it is not completely clear what this risk-based framework is and how it will be applied. The project evidence gathered on Medupi and the LHWP provide examples of these challenges in practice.

The NDB's IAM policy was put to the board in 2022. CSOs were not consulted, although this has not been ruled out by the NDB.¹⁴² As detailed later, CSOs have made efforts to influence this policy through evidence-based research.

Despite not engaging CSOs in project design and monitoring, the NDB has identified its evaluation policy¹⁴³ as a key means of engagement with CSOs at the project level.¹⁴⁴ This was approved by the Board of Directors in 2022 and its evaluation strategy for 2024-2026¹⁴⁵ considers CSOs across three aspects. The first element is impact, where the NDB looks at several dimensions, namely gender equality, environment, engagement of communities, and inequality. The second element is the evaluation criteria for assessing partnerships that the Bank has been able to pursue. This includes CSOs. Here the evaluation manual analyses how the Bank has listened to beneficiaries in project design. The third element relates to evaluating NDB's own performance, as well as government performance. Positively, an evaluation of Renewable Energy Projects and Associated Transmission in Brazil suggests that CSOs were consulted during this evaluation but does not provide any further details.¹⁴⁶ However, engaging CSOs in evaluation is a reactive, rather than a proactive measure.

WB

The WB has undergone several shifts in its approach to engaging CSOs in projects. An internal review in 1973 found that the 'social dimensions' mattered for development effectiveness, but this was mainly centred on harm mitigation and reduction of reputational risk.¹⁴⁷ Then, an agriculture report found that project success was linked to the active participation of farmers in

142 CSF-NDB 'Business lunch between NDB and Civil Society Organisations and Non-Governmental Organisations' (31 August 2024).

143 NDB 'Evaluation policy' (2024) https://www.ndb.int/wp-content/uploads/2024/04/NDB_IEO_Evaluation-Policy-.pdf (accessed 6 February 2025).

144 NDB Business Lunch with CSOs (2024).

145 NDB 'Evaluation strategy' (2023) <https://www.ndb.int/wp-content/uploads/2023/12/IEO-Evaluation-Strategy-2024-2026.pdf> (accessed 6 February 2025).

146 New Development Bank, Independent Evaluation Office 'Federative Republic of Brazil Renewable Energy Projects and Associated Transmission: Project Performance Evaluation - Final report' (December 2023) <https://www.ndb.int/wp-content/uploads/2024/02/Brazil-Report-PPE-final-version.pdf> (accessed 6 February 2025).

147 Nadelman (n 75).

planning, design, and implementation. In the 1980s, the Bank introduced ‘do-no-harm’ policies, but these were limited in scope; then, in 1985, its report, *Putting people first*, centred on people affected by development projects; and in 1992 it highlighted the link between project effectiveness and participation in agricultural and rural development projects in *Participatory development and the World Bank: Potential directions for change*.¹⁴⁸ Another Operation Evaluation Department (OED) released around the same time highlighted the link between project effectiveness and participation in agricultural and rural development projects. The WB subsequently launched the Participatory Development Learning Group in 1990 and the 1993-1996 *Participation Sourcebook*, which promoted participatory development.¹⁴⁹ The WB further emphasised Community-Driven Development frameworks to empower communities to have access to resources and decision-making, seeing them as partners rather than beneficiaries.

However, it has been argued that from 2005-2012 there was a backsliding of institutional support for participation, social accountability, and demand-side governance.¹⁵⁰ In a positive development, when Jim Yong Kim became president of the WB in 2013, citizen engagement was officially tracked under project monitoring. As mentioned earlier, the Citizen Engagement Framework resulted in mainstreaming CSO engagement in projects, with over 90 per cent of projects including some form of engagement between 2016-2023.¹⁵¹ However, this may only reflect minimal, rather than meaningful engagement.

In this regard, a 2021 CSO review of the WB COVID-19 emergency response project documents assessed whether the WB was preparing and implementing high-quality Stakeholder Engagement Plans (SEPs) and found that the WB could do more to consider the views of marginalised groups. It could do more to include timely and accessible project information (such as through including SEPs in local languages) and to create culturally sensitive grievance mechanisms. To support the comprehensive implementation of SEPs, borrowers should include line-item budgets with adequate resources to support all planned activities within the SEPs.¹⁵² As mentioned earlier, the new Corporate Scorecard considers the quality of citizen and CSOs engagement at the country and project level, but this new methodology will need to be tested and refined where necessary.

148 Nadelman (n 75); MM Cernea (ed) *Putting people first* 2nd ed (1985); B Bhatnagar & AC Williams (eds) *Participatory development and the World Bank: Potential directions for change* World Bank Discussion Paper 83 (1992).

149 Nadelman (n 75).

150 As above.

151 As above.

152 K Gallagher ‘How can the World Bank improve stakeholder engagement in COVID-19 Fast Track Facility projects and beyond?’ (2021) <https://bankinformationcenter.org/en-us/update/help-or-harm-in-times-of-emergency-report/> (accessed 6 February 2025).

The WB primarily supports CSOs through indirect funding given to governments – and through limited direct funding in particular country situations, especially fragile contexts. CSOs have consistently pushed for more direct funding, which led to the creation of the Global Partnership for Social Accountability (GPSA) in 2012. CIVIC: The Civil Society and Social Innovation Alliance is expected to be the GPSA's successor as a multi-donor trust fund to directly support CSOs and social economy actors, aiming to institutionalise participatory approaches and to better integrate innovation into the Bank's approaches. CIVIC will focus on climate, health, gender and youth. This provides an opportunity for CSOs to lead their own projects.¹⁵³

The WB's civil society strategy cites operational collaboration to implement project activities.¹⁵⁴ Some of these efforts are detailed online. For example, a publication on the WB's Stakeholder Engagement in Africa cites details of some of its engagement with civil society, such as establishing a dedicated platform with civil society in Ghana.¹⁵⁵ This included deepening CSO understandings of the WB's country operations (policies, projects and programmes), enhancing CSO capacity to monitor and evaluate WB projects and programmes, establishing a more formally structured WB Civil Society Platform, and setting the overall tone for stronger collaboration and effective advocacy. In Malawi, WB funding supported CSOs to train communities on monitoring and advocating for transparency in the public procurement processes for education. In Senegal, WB funding supported the creation of nine local committees to assist with roll out a climate adaptation project, while CSOs also supported the resettlement of 30 000 people to develop the Dakar-Diamniadio Toll Road.¹⁵⁶ In Madagascar, the WB worked with MPs to raise awareness about draft loan agreements for various funded projects.¹⁵⁷

In the strategic review of CESA, 'Citizens at the centre', it was found that the WB has made strong progress in engaging citizens in the design of projects, but that this reduces during implementation.¹⁵⁸ The review emphasised that project-level engagement with citizens and CSOs was instrumental in achieving effective development results, and can contribute to broader goals of citizen empowerment, strengthened citizen-state relations, and more transparent and accountable governance. It could also build the foundation for higher-level 'vertically integrated' mechanisms to be developed.

153 International Development Association (n 70).

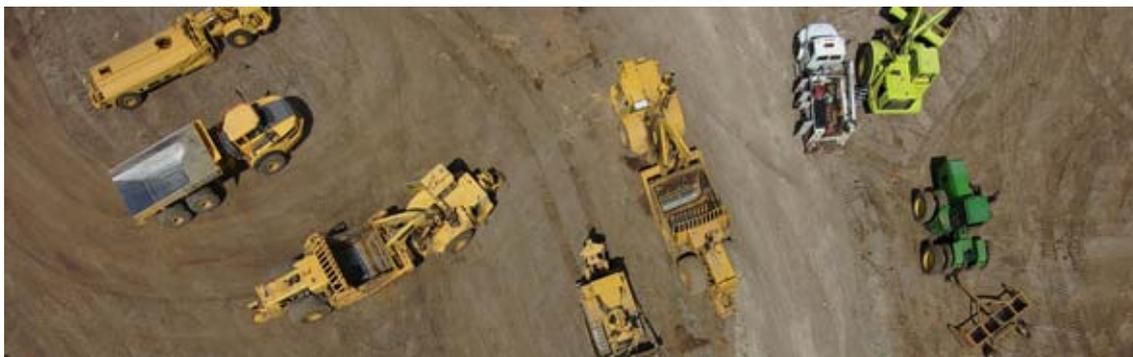
154 WB (n 69).

155 WB 'Stakeholder engagement in Africa: Civil Society Organisations and members of parliament' <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/918401560845948149/stakeholder-engagement-in-africa-civil-society-organisations-and-members-of-parliament> (accessed 6 February 2025).

156 As above.

157 As above.

158 Malena (n 15).



In its first finding, the review found that, while citizens are almost always consulted in some form, they are not given adequate decision-making capacities, such as through management or contracting, evaluation, membership in decision-making bodies, or participatory budgeting. The review concluded that resources and expertise were needed to enable WB staff to better apply approaches. The review gave operational lessons for giving citizens a meaningful say in decision-making, which broadly cover early and regular engagement, that closes the feedback loop, being explicit about defining participation, being intentional about including traditionally marginalised groups, and providing better decision-making mechanisms for citizens. The review also found that some projects were not identified as requiring citizen participation by the WB's monitoring system.

Secondly, the review also found that only a minority of WB-supported projects practice social accountability, such as by using community scorecards, citizen report cards and social audits. There was also a lack of social accountability at the portfolio/country level. The review found that third-party monitoring by CSOs was an important way to CE responses and that social accountability approaches were also an important anti-corruption measure. Thirdly, the review pointed to the need for projects to include a greater political economy/power analysis in projects. Fourthly, it pointed to the need for a more coherent and genuinely inclusive approach across different agendas, such as CESA and ESF, and for a more client-focused approach to these agendas. Fifthly, the review found that there was room to improve the quality, tracking, and reporting of CESA indicators, and to improve reporting on results. Finally, the review pointed to including dedicated project funds for CESA, improving human resources and capacity among WB teams, and enhancing collaboration with CSOs.

In terms of recourse for projects, the WB was the first of its kind among PDBs to establish an IAM, the Inspection Panel in 1992, after facing fierce criticism over how projects managed resettlement. This set a precedent for receiving complaints from project-affected communities.¹⁵⁹

159 Nadelman (n 75).



Case study: Lessons learnt from WB projects involving resettlement

Civil society has raised questions over the Inspection Panel's effectiveness, which has only investigated 32 out of 89 requests involving involuntary resettlement since its inception.¹⁶⁰ Of these, 21 involved forcible resettlement, and in several of the cases the WB had underestimated the number of people to be displaced.

The WB, however, conducted a review of projects between 1994-2014, and outlines seven lessons learnt that can be shared with other PDBs,¹⁶¹ namely:

- *The risks of involuntary resettlement should be assessed comprehensively before a project begins.*
- *Meaningful consultation and participation should be an essential part of involuntary resettlement programmes.*
- *If the Bank's resettlement policy is utilised, then there should be preparation of a resettlement policy framework or a resettlement action plan.*
- *Resettlement projects should be actively supervised to properly identify and resolve issues.*
- *Compensation to project-affected people should be timely and needs to have a sound method of valuing the amount of compensation.*
- *A local grievance redress mechanism needs to be available and accessible to the affected people.*

160 L Udall 'Unacceptable means: The inspection panel actions on WB forcible resettlement' (2024) <https://digitalcommons.wcl.american.edu/cgi/viewcontent.cgi?article=1023&context=accountability-perspectives> (accessed 6 February 2025).

161 World Bank 'Emerging Lessons Series No 1: Involuntary Resettlement, Inspection Panel, April 2016' (2016) <https://openknowledge.worldbank.org/entities/publication/1338b6ac-0ba1-5383-8f20-dfb6685cb11b> (accessed 6 February 2025).

- *The goal of livelihood restoration is most effective when there is transitional support, development assistance and alternatives to resettlement are provided.*

Despite these recommendations, there are still challenges with implementing this in practice.

CSOs have recommended that the Inspection Panel be given more powers, for example for greater monitoring, the power to recommend the suspension of a project, and that it should be able to make recommendations on remedy.¹⁶² In 2020, the WB Board approved a resolution to establish the WB Accountability Mechanism (AM) that houses the Inspection Panel to carry out compliance reviews and a newly created Dispute Resolution Service (DRS).¹⁶³ Despite the WB's strong commitment to 'not tolerate reprisals', some have accused the WB of neglecting the risks citizens take and not doing all it can to stop reprisals. Recommendations have included incorporating contextual risk assessments, proactively engaging government counterparts on the WB's stance to reprisals, adapting project design and implementation to prevent and mitigate reprisals – such as by holding separate consultations with vulnerable stakeholders, and developing a strict and explicit protocol to immediately elevate reports of reprisals to a level above the country or project team.¹⁶⁴

The World Bank Group (WBG) also established an accountability mechanism, called the Compliance Advisor Ombudsman (CAO) to address environmental and social issues arising from projects undertaken by the IFC and MIGA. It should be noted that IFC has faced several lawsuits over the years. In the case of *Budha Ismail Jam v IFC*, an Indian fishing community has been attempting to hold the IFC responsible for the environmental pollution caused by the Tata Mundra Ultra Mega coal-fired power plant in Gujarat, India. The CAO has criticised the project, but the IFC has failed to act. In 2019, the US Supreme Court rejected the long-standing notion that the IFC is immune from lawsuits, though the communities' suit was ultimately rejected on appeal. However, the case has brought these practices to light, and the IFC has conducted some reforms, including on environmental and social safeguards.¹⁶⁵ In 2024, a US court approved

162 Udall (n 160).

163 World Bank 'Board approves resolutions to establish the World Bank Accountability Mechanism, add tools to the Panel' (2020) <https://www.inspectionpanel.org/news/board-approves-resolutions-establish-world-bank-accountability-mechanism-add-tools-panel> (accessed 6 February 2025).

164 Malena (n 15).

165 L Clarke 'Supreme Court rejects World Bank coal case' (2022) <https://www.eenews.net/articles/supreme-court-rejects-world-bank-coal-case/> (accessed 6 February 2025).

a landmark settlement for campesino families in Honduras, who had been victims of armed violence by armed agents of Corporación Dinant in a palm oil project, under the *Juana Doe v International Finance Corporation* case. This is the first time any international financial institution has agreed to provide a remedy to end a lawsuit brought by an injured community.¹⁶⁶



Priscila Dramisino

Case study: Advocating for a remedy fund across PDBs

In 2019, the WB Group decided to launch an external review of the IFC's and MIGA's environmental and social accountability, including the role and effectiveness of the CAO. As noted by the WB, the review 'reflects the Boards' continuing focus on effective and efficient accountability functions'.¹⁶⁷ During the consultations, CSOs made a series of recommendations, that can be used as guides for advocating for remedial approaches with Banks.¹⁶⁸ It is worth noting that the UNGPs state that those contributing to harms should be contributing to remedy, and provide guiding principles, such as the need to align frameworks to human rights, define types of remedy, have specific processes for

166 Earthrights International 'Historic settlement in case alleging international finance corporation abetted murder in Honduras' (2024) https://earthrights.org/media_release/historic-settlement-in-case-alleging-international-finance-corporation-abetted-murder-in-honduras/ (accessed 6 February 2025).

167 World Bank 'Review team conducting the external review of IFC/MIGA E&S Accountability, including CAO's role and effectiveness' (2019) <https://www.worldbank.org/en/about/leadership/brief/review-team> (accessed 6 February 2025).

168 Centre for International Environmental Law 'Joint CSO Statement calls on IFC and MIGA to strengthen its new approach to Remedial Action Policy' (2023) <https://www.ciel.org/news/joint-cso-statement-calls-on-ifc-and-miga-to-strengthen-its-new-approach-to-remedial-action-policy/> (accessed 6 February 2025).

remedy, and ensure access to remedy after a project is complete.¹⁶⁹

Accountability Counsel has long been working with partners to advocate that facilitating remedy be a key purpose of an IAM process. Having made submissions previously to the AIIB, AfDB and EBRD on remedy, Accountability Counsel and several global partners submitted recommendations to the IFC and MIGA. The submission drew on concrete project experiences collated by the organisations. Positively, the cases show that compliance reviews have sometimes (but not always) resulted in remedial action plans. However, these remedial action plans have been impeded by a lack of resources. They therefore recommend the establishment of a remedy fund.¹⁷⁰ This has been echoed by calls from the FIDH and Bankwatch that PDBs should provide information on potential sources of funding for remedial measures, such as remedy funds, insurance schemes, escrow arrangements, trust funds, contingency funds, contingent guarantees, and letters of credit.

There have also been challenges in PDBs exiting without responsible exit plans. Worryingly, a report by the CAO has found that, in the last decade, **the IFC and its clients have expedited exits in 41 per cent of the debt investments subject to complaints filed with its accountability mechanism, the CAO, all while the complaint process was ongoing. Most of these exits (88 per cent) were categorised as ‘early exits’, and yet there was no systematic approach to addressing harm.**¹⁷¹ CSOs have therefore also advocated for PDBs to develop responsible exit policies. For example, Accountability Counsel has noted that the IFC only applies responsible exit principles to investments where the IFC leaves, but not if the client pulls out early or prepays its loan. They have therefore urged the IFC to develop concrete plans for environmental and social concerns across all projects.¹⁷²

In a recent turn of events, the WB and the ADB released a Full Mutual Reliance Framework in

169 United Nations ‘Guiding principles on business and human rights’ (2011) https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinessshr_en.pdf (accessed 6 February 2025).

170 Accountability Counsel ‘Remedy requires real resources’ <https://www.accountabilitycounsel.org/institution/inadequate-remedy-for-environmental-and-social-harms/#our-advocacy> (accessed 6 February 2025).

171 CAO ‘Advisory note. Responsible exit: Insights from CAO cases’ (December 2023) <https://www.cao-ombudsman.org/resources/responsible-exit-insights-cao-cases> (accessed 6 February 2025). Accountability Counsel ‘Why IFC’s practice of irresponsibly exiting projects must stop’ (2024) <https://www.accountabilitycounsel.org/2024/01/why-ifcs-practice-of-irresponsibly-exiting-projects-must-stop/> (accessed 6 February 2025).

172 A Saldinger ‘IFC’s new “responsible exit” policy: Milestone or a missed opportunity?’ (2024) <https://www.devex.com/news/ifc-s-new-responsible-exit-policy-milestone-or-a-missed-opportunity-108532> (accessed 6 February 2025).

October 2024, which states that the lead lender's policies and procedures completely and solely apply, and complaints would be limited to the lead lender's IAM. The Accountability Counsel has voiced concerns about the Framework, which could lead to weaker environmental and social standards being applied in certain circumstances. Moreover, they have detailed how the framework undermines communities' access to justice, since communities may file a complaint at a particular IAM because they have more trust in it, or because they believe that one institution has more shortcomings to highlight. They might also want to file multiple claims to hold each PDB accountable for their role in the project and to have greater chances of obtaining remedy.¹⁷³

5.2.2 Project-level summary and recommendations

Good practices based on key findings

- **CSO engagement at the project design, implementation, and monitoring stage.** Consultation communities at the earliest stages of project inception, particularly for higher-risk projects.
- **Development of indicators to measure CSO engagement in projects** (either in project design, implementation, and monitoring or in terms of effectiveness, and added value in terms of social capital and trust).
- **Provision of funding to develop budget lines** for CSO engagement at the project level.
- **Involvement of CSOs as a social accountability measure**, such as through citizen scorecards, social audits, or third-party monitoring.
- **Greater monitoring role for PDBs on human rights due diligence** and project safeguards.
- **Adoption of a zero-tolerance approach to reprisals** and adopt measures to prevent and mitigate reprisals (for example, contextual risk assessments, engaging government counterparts on reprisals, holding separate consultations with vulnerable communities, and elevating reports of reprisals above the project or country team).
- **Establishment of IAMs in line with international practice**, which ensures that communities can access IAMs without having first exhausted project-level grievance mechanisms.
- **Community engagement in the drafting of management action plans.**
- **Establishment of clear frameworks on remedy**, giving responsibility to the

173 Amoako (n 82).

borrower and a greater monitoring role for the PDB, and establishment of remedy funds.

- **Adoption of responsible exit principles**, ensuring that PDBs do not exit projects without ensuring that environmental and social standards are met, that harm is remediated, and that the negative impacts of an exit are assessed and mitigated.

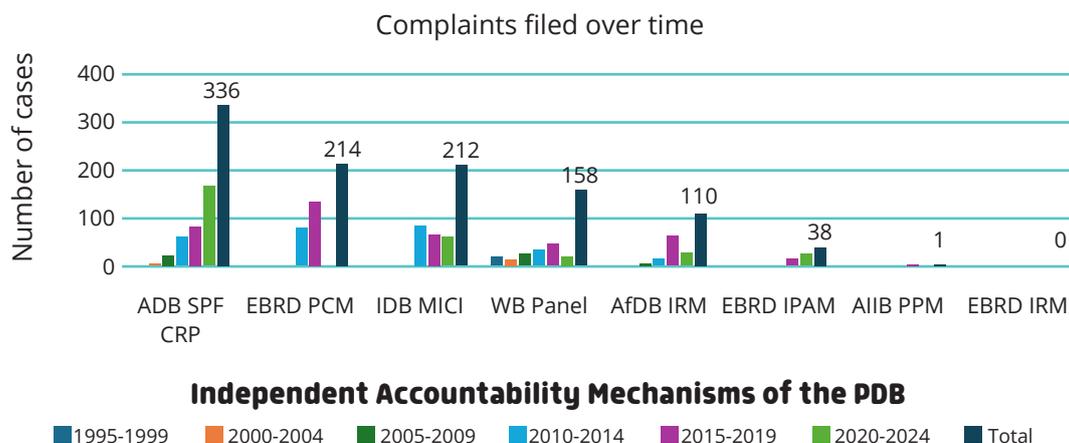
PDBs have taken different approaches to engaging CSOs at the project level. For example, the ADB's civil society policy engages CSOs as contractors (at the operational level), which is something that the AfDB has also more recently taken up. The EBRD also engages CSOs at the operational level through the CSCEF but CSOs have argued that community involvement at the project level is weak. At the AIIB and IDB, engagement at the project level has been limited due to an absence of guidelines, although the IDB has taken steps in its civil society strategy to strengthen the Civil Society and Institutional Capacity Training Programme. Moreover, it now intends to pilot projects to generate knowledge and data on the value-added of citizen participation. The NDB, on the other hand, has not yet engaged CSOs on projects, while CSOs have taken the initiative to monitor projects themselves.

At the WB, CSOs are engaged in project design but could be better engaged in project implementation. Moreover, CSOs could have a greater say in decision-making. They could also play a stronger role in social accountability measures. To achieve better CSO engagement, the WB could include dedicated project funds for CESA, improve human resources and capacity among WB teams, and enhance collaboration with CSOs.

Complaints filed at accountability mechanisms illustrate the harms caused by projects that do not invest in thorough due diligence. However, the independence and eligibility requirements have varied across PDBs. The Accountability Console database shows that across the seven PDBs surveyed in this report, 1 080 complaints have been submitted. In total, 78,7 per cent of complaints were closed without outputs, while only 21,8 per cent were considered eligible.¹⁷⁴ The graph below illustrates the number of complaints filed over time across the different PDBs mapped in this study. This illustrates that complaints continue to be filed across all PDBs, regardless of eligibility, and suggests the need to continue investing in thorough due diligence.

174 Accountability Console 'Complaints' <https://www.accountabilityconsole.com/complaints/visualize/?iam=5&iam=8&iam=17&iam=26&iam=6&iam=4&iam=27&iam=3> (accessed 6 February 2025).

Graph 1: Complaints filed over time at the ADB, AfDB, AIIB, EBRD, IDB, NDB, and WB (until 2024)¹⁷⁵



Thus, the reality is that PDBs are not aware of many of the problems associated with projects, and victims are unable to access remedy. The complaints filed at these mechanisms also illustrate the limitations of country systems that are not in line with international human rights standards and the risk of reprisals.

The WB was the first to institute an accountability mechanism and good practices are now shared through the Independent Accountability Mechanisms Network (IAMnet).¹⁷⁶ CSOs have raised concerns over the ADB and the AIIB’s accountability mechanism, while the EBRD’s accountability mechanism, which was established in 2020 to replace a previous mechanism, has brought it largely in line with good practice, CSOs have successfully submitted complaints and the AfDB’s IRM and the IDB’s MICI and have had some wins in affirming the concerns of CSOs. The NDB is still in the process of developing its accountability mechanism (and has consulted sister institutions but not CSOs) and could obtain guidance from a good policy paper that has been developed by several CSOs.¹⁷⁷ One recurring theme is that remedy for victims is still hard to obtain. In this regard, the UN Human Rights Office has also released

175 Author’s adaption from Accountability Console (n 174). The EBRD notes a total of 40 cases to date, as discussed through personal communication.

176 World Bank ‘The Independent Accountability Mechanisms Network (IAMnet)’ <https://accountability.worldbank.org/en/iamnet> (accessed 6 February 2025).

177 Accountability Counsel and others ‘Good Policy Paper: Guiding practice from the policies of the Independent Accountability Mechanisms’ (December 2021) <https://accountabilitycounsel.org/wp-content/uploads/2021/12/good-policy-paper-final.pdf> (accessed 6 February 2025).

a report on how PDBs can improve their responses to remedy.¹⁷⁸ It has also developed the UNGPs, which PDBs could do well to adhere to.¹⁷⁹ As the recent case of *Juana Doe v International Finance Corporation* shows, PDBs are not completely immune to lawsuits, which are costly and cause reputational risk. Early exits also pose a problem, and PDBs across the board should develop responsible exit plans.

The following recommendations are made:

For PDBs

- **Develop metrics for analysing meaningful CSO engagement** in project design, implementation, and monitoring.
- **Go beyond considering CSOs as contractors.** Develop metrics that consider CSO expertise in enhancing social capital and trust, which ensure that communities are adequately consulted in project design so that project risks are minimised, and that sustainability, inclusive development, and innovation are promoted.
- **Develop safe spaces for CSO engagement at the project level** and ensure a zero-tolerance approach to reprisals. Develop contextual risk assessments, proactively engage government counterparts on the issue of reprisals, and develop a protocol to elevate complaints of retaliation above the project and country.
- **Develop guidelines to bring clients in line with good practice.** This relates to CSO engagement at the project level, the use of country systems in conducting human rights due diligence, and structuring and operating an effective grievance mechanism at the project level based on the UNGPs.
- **Bring accountability mechanisms in line with international standards and good practice,** including allowing communities to access this mechanism without having first exhausted project-level grievance mechanisms.
- **Engage CSOs and communities in the drafting of management action plans.**
- **Engage in discussions with sister institutions and CSOs on the right to remedy,** while affirming greater responsibility for PDBs in ensuring the right to remedy through the provision of a remedy fund.

178 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 6 February 2025).

179 United Nations (n 169).

For CSOs

- **Promote a human rights and community-centred approach to project design within PDBs.**
- **Continue to monitor the negative consequences of projects that are implemented without due diligence**, illustrating the costs of divestment.
- **Propose metrics to capture the value-added of community/CSO engagement with PDBs** at the project level.
- **Work with PDBs to ensure guidance is given to the client on effective project grievance mechanisms** based on the UNGPs, with a zero-tolerance approach to retaliation.
- **Emphasise the need for a stronger PDB monitoring role** in the use of country systems.
- **Advocate for PDBs to ensure remedy.** Gather community perspectives on what the right to remedy constitutes and use this to influence discussions.
- **Continue to advocate for responsible exit plans**, documenting cases where communities have not had access to remedy as a result of divestment.
- **Raise awareness on country-specific challenges with civic space.**

5.3 Country-level

5.3.1 Country-level analysis

At country level, CSOs can engage with the country offices, including by participating in consultations throughout project cycles and by joining stakeholder engagement processes around country and sectoral strategies. PDBs use country strategies to set their priorities at the country level. Note that the term can vary slightly – at the AfDB, this is called a Country Strategy Paper (CSP), while it is called a Country Partnership Strategy (CPS) at the ADB. These strategies are often aligned to the PDBs institutional strategy and a country's national development agenda. Some Banks, such as the ADB, detail schedules of upcoming country partnership strategies on their websites.¹⁸⁰ CSOs can also engage with national governments and raise awareness.

ADB

Some PDBs are increasingly engaging CSOs in country strategies. For example, 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

180 ADB 'Where we work' <https://www.adb.org/where-we-work/documents/country-strategies-programs-under-preparation> (accessed 6 February 2025).

country partnership strategies (CPS) that will guide ADB operations in those countries over five years.¹⁸¹ 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. This approach was pilot-tested in the governance assessment for the Kyrgyz Republic and is now being rolled out in succeeding assessments and CPSs. In 2023, the ADB consulted CSOs in Azerbaijan, Bhutan, Cambodia, and Georgia during the preparation of the countries' Governance Assessments.¹⁸² These efforts illustrate that CSOs can be used to enhance an understanding of the political, social, and economic context and make a good business case for engaging CSOs at the country level. In a review of CSO engagement in 2022, the ADB found that forming country-level ADB-government-CSO tripartite sector groups, if non-existent, or a CSO country advisory group for the ADB resident mission, could be instrumental in improving regular government-CSO interaction at the country-level.¹⁸³

AfDB

At the AfDB, the Bank relies on ten-year strategies, which CSOs could engage with while under development, but the primary point of entry is through the CSP. CSOs can also engage on specific projects or 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 2023¹⁸⁴ and Lesotho in 2024.¹⁸⁵ In October 2024, the AfDB held an open day for CSOs in Zambia to provide insights into the CSP.¹⁸⁶ 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

181 ADB (n 30).

182 As above.

183 Asian Development Bank (ADB) 'Working together for development results: Lessons from ADB and Civil Society Organisation engagement in South Asia' (2022).

184 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 6 February 2025).

185 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 6 February 2025).

186 AfDB 'Zambia Civil Society Organisations Open Day' (2024) <https://www.afdb.org/en/news-and-events/events/zambia-civil-society-organisations-open-day-74977> (accessed 6 February 2025).

capacity building, resource mobilisation, knowledge management, and advocacy.¹⁸⁷ A review by the AfDB's IDEV (2012-2019) suggested that the AfDB strengthen CSO engagement in policy dialogue at the country and regional levels by developing guidance for CSO engagement in policy dialogue, setting up institutional arrangements, and systematising open days at CSO level.¹⁸⁸ To date, the AfDB appears not to have developed guidance, and country engagement differs according to the country.



Burkina Faso / Ouagadougou

Case study: Engaging communities in Burkina Faso's country strategy for the AfDB

*In May 2023, civil society was invited to engage in the review of Burkina Faso's interim country portfolio review. There are 21 active projects in Burkina Faso, including projects that have involved constructing infrastructure for vulnerable populations, and projects to reduce youth unemployment in rural areas. The dialogue strengthened the partnership between the AfDB and civil society in implementing projects and led to the creation of a Bank-Government-Civil Society Tripartite Committee to monitor and follow up on Bank-financed projects and programmes in Burkina Faso.*¹⁸⁹

AIIB

The AIIB does not make provision for engagement in Country Strategies and has no country offices. Since the AIIB is still relatively new, it has therefore justified its engagement with CSOs

187 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 6 February 2025).

188 Independent Development Evaluation African Development Bank (n 40).

189 AfDB (n 184).

at annual meetings as a ‘modest step’ towards collaboration.¹⁹⁰ Its high-level commitments that are specified in its Corporate Strategy are operationalised through annual business plans and budgets.

EBRD

The EBRD’s approach to civil society outlines that the Civil Society Steering Committee (CSSC) will support consultations on country strategies. This was established in January 2024. Written prior to the establishment of the CSSC, the EBRD’s Guide Civil Society states that it undertakes Country Strategy Missions where it engages with civil society.¹⁹¹ The EBRD notes that this feedback is integrated into the draft country strategy, which is available to download in English and the local language and open for comments for 45 calendar days. It also states that it undertakes dedicated consultation workshops with CSOs at the Resident offices where possible. There are also Board consultation visits to countries of operation, where the Board delegation engages with CSOs, as well as the President’s visits to countries of operation.

Even so, civil society has spoken out about some country strategies. For example, CSOs noted that the 2022 Egypt Country Strategy takes a more realistic appraisal of the human rights situation in Egypt than the last assessment and strategy. However, they described the language used by the EBRD on human rights and the rule of law as too diplomatic and insisted that the strategy should include necessary reforms of repressive laws, protections against the harassment of human rights defenders, and policies that promote the existence of an independent Egyptian civil society. CSOs also questioned the EBRD’s statement that it is beyond the Bank’s remit ‘to prescribe specific priorities, actions, or indicators in the political sphere’.¹⁹² However, the EBRD is now considering introducing a pre-consultation public commenting period, where civil society can share written feedback on the previous strategy, that can be used to inform the new strategy.¹⁹³

IDB

Like the EBRD, the IDB’s strategy notes that the creation of civil society consultative groups (ConSocs) has been a key tool for capacity building and consolidation of the Bank’s relations

190 AIIB ‘The two-way street: CSO engagement and infrastructure development’ (2019) <https://www.aiib.org/en/news-events/media-center/blog/2019/The-Two-Way-Street-CSO-Engagement-and-Infrastructure-Development.html> (accessed 6 February 2025).

191 EBRD ‘Working with the EBRD: A guide for civil society organisations’ <https://www.ebrd.com/documents/comms-and-bis/pdf-working-with-the-ebrd.pdf> (accessed 6 February 2025).

192 Human Rights Watch ‘Joint Response to the EBRD’s 2022-27 Strategy for Egypt’ (2022) <https://www.hrw.org/news/2022/04/18/joint-response-ebrds-2022-27-strategy-egypt> (accessed 6 February 2025).

193 Personal communication with EBRD.

with the country's CSOs. However, it notes the need for more robust participation and representativeness on the ConSocs of communities in peri-urban and rural areas and on the composition of ConSocs more broadly.¹⁹⁴ It also notes how CSO engagement has contributed to understanding the social fabric at regional and country levels. The IDB's action plan emphasises how specific and systematic training of Country Office civil society liaisons are needed to fulfil the outcomes of its civil society strategy and commits to developing a programme for IDB staff on how to hold effective consultations. It also proposed enhancing the use of analytical tools to gather civil society perceptions. The action plan sets out several indicators to measure effective engagement, which includes developing a communication strategy on IDB group sector and good country level practices with civil society, amongst others.¹⁹⁵

NDB

The NDB primarily relies on national development plans for guidance, rather than using specific NDB country strategies. Nevertheless, the process followed has not always been clear to civil society. A report commissioned by Oxfam and written by the Centre for Environmental Rights (CER) notes that:

CER has not been able to locate the CPP for South Africa; any studies or thematic analyses used to prepare such plans; additional studies conducted by development partners and think tanks; any country partnership framework paper; or a country project pipeline or summary of projects subject to technical assistance.¹⁹⁶

The CSF of the NDB has continued to advocate for their inclusion in the development of regional and country strategies, first raising the issue in October 2018.¹⁹⁷ Even so, the NDB's ARC has been open to civil society engagement on multiple occasions, with the CSF-NDB engaging with the ARC since its inception.¹⁹⁸ In December 2024, CSO representatives from the CSF-NDB met with the ARC to discuss areas of mutual interest, including institutionalising CSO engagement, greater community engagement at the country level, and awareness

194 IDB (n 60).

195 IDB (n 61).

196 Centre for Environmental Rights 'Briefing Paper: Information disclosure and grievance mechanisms of the New Development Bank' (2021) <https://www.oxfam.org.za/wp-content/uploads/2021/08/oxfam-ndb-report.pdf> (accessed 6 February 2025).

197 CSF-NDB 'Report of the NDB Meeting, 30 October 2018' (2018), obtained through personal communication.

198 As above.

raising among communities.¹⁹⁹ A mapping for the CSF-NDB was conducted in 2024 on behalf of Forus, to assess potential engagements between the NDB and civil society in Brazil, Russia, India, and China. To date, it appears that CSOs outside of Southern Africa have not engaged with the NDB's other regional centres.²⁰⁰

WB

The WB's Strategy for Citizen Engagement notes that civil society and Members of Parliament (MPs) are engaged through the CPF and SCD, Country Economic Updates, and project preparation. It also cites operational collaboration to implement project activities.²⁰¹ It is also worth noting that the Strategy for Citizen Engagement, which is complemented by the Independent Evaluation Group's 2018 'Engaging citizens for better development results', and the 2019 technical note, 'Mainstreaming citizen engagement through the Country Engagement Approach', suggests using the Bank's Country Engagement Approach to understand the local context and political economy factors that affect citizen engagement. However, CSOs have suggested that the WB should develop an assessment of civic space as a component in the SCD tool that should be considered when deciding to fund projects.²⁰²

CSOs have also argued that the WB's country offices are not always responsive or aware of the requirement to consult civil society.²⁰³ In an analysis of a project in the Gambia, 'Boosting resilience and unlocking productive potential Development Policy Finance (DPF)', civil society lamented that there had been inconsistent engagement with DPF community beneficiaries, inadequate information disclosure and access and the exclusion of CSOs in monitoring, evaluation and accountability committees. Communities were also unaware of available grievance redress mechanisms and there was no project implementation unit.²⁰⁴

In the Strategic Review of CESA, 'Citizens at the centre', one of the key priorities for improving

199 NDB-CSF representatives meeting on 4 December 2024.

200 Personal communication and engagement with author of the mapping study for the CSF-NDB. Internal document, not for external distribution.

201 World Bank (n 155).

202 C Donaldson and others 'Civic space: The missing element in the World Bank's country engagement approach' Oxfam (2022) <https://accountabilityresearch.org/publication/civic-space-the-missing-element-in-the-world-banks-country-engagement-approach/> (accessed 6 February 2025).

203 Bank Information Centre 'Central Asia civil society guide on influencing World Bank country strategies' (2019) <https://re-course.org/wp-content/uploads/2021/11/Central-Asia-Civil-Society-Guide-on-Influencing-WB-Country-Strategies-1.pdf> (accessed 6 February 2025).

204 Bank Information Centre 'The Gambia Boosting Resilience and Unlocking Productive Potential DPF1 with Cat DDO' (2023) <https://bankinformationcenter.org/en-us/project/the-gambia-boosting-resilience-and-unlocking-productive/> (accessed 6 February 2025).

citizen engagement was through country systems.²⁰⁵ The review points out that these approaches are likely to yield scalable and sustainable development results but can also enhance citizen-state relations and ensure a more responsive and accountable government. The research found that several WB projects and programmes employ a systems-oriented approach to CESA, which connects the local to the national. In this regard, the study found that organic and bottom-up solutions were most beneficial. An increasing number of WB projects have looked to build on country systems to institutionalise CESA through centralised systems for citizen feedback. In some cases, WB projects have led to stronger country systems for deeper forms of CESA. The review also identified digital technology as an opportunity to systematise and deepen citizen engagement and social accountability practices. While these are increasingly used, they cannot replace offline engagement. A hybrid approach was recommended, but importantly, the review pointed to the need to protect and promote digital space.²⁰⁶

The Strategic Review found that an effective way to strengthen CESA was by supporting existing institutions, particularly those with accountability and oversight goals.²⁰⁷ However, it found that supporting government institutions might not be appropriate in all contexts. There was also a large variation of citizen engagement across countries, and more could be done to integrate a country-level, systems-oriented approach. The review points out that there is strong scope to enhance the integration of CESA throughout the CPF cycle, and an opportunity for greater CESA engagement in the production of CPF products. It recommends that the WB provide further guidance on integrating CESA into the CPF cycle, such as through describing how to conduct CESA analysis; identifying entry points for CESA content in different sections of CPF products; and providing examples of consultation practices during the CPF Cycle, sample research questions, as well as a list of proposed CESA research databases and diagnostic tools. There was also the potential to expand CESA-related initiatives in the WB's Advice and Analytics activities. The review also stressed the WB's potential to support inclusive, multistakeholder platforms.²⁰⁸ In addition, the study recommends paying particular attention to areas in which CESA is likely to have the biggest impact, such as climate action, anti-corruption, fragility and conflict.

The above-mentioned review also outlined how enabling conditions for CESA are key to achieving results. It found the need for more thorough context and political economy analysis at the country and project levels and called on the WB to invest more in this, while proactively supporting the conditions for civil society. It found a lack of political will by both

205 Malena (n 15).

206 As above.

207 As above.

208 As above.

state actors and CSOs posed a challenge to country contexts and suggested that the WB proactively build political will for CESA. It also suggested CESA capacity building for state and non-state actors. Importantly, the study found that CESA approaches can contribute to broader goals of building trust, improving state-society relations and renewing the social contract. This is particularly useful in fragile and conflict-affected settings.

5.3.2 *Country-level summary and recommendations*

Good practices based on key findings

- **Establishment of country-level PDB-government-CSO tripartite sector groups** or advisory councils.
- **Creation of thematic-focused multi-stakeholder dialogue platforms** with sectoral expertise.
- **Adoption of a systems-oriented approach to country-level CSO engagement.**
- **Utilization of digital technologies to gather CSO and citizen views**, while supporting the protection and promotion of digital space.
- **Guidance for engaging CSOs in country and sector strategies** and throughout the country cycle.
- **Assessment of levels of civic space in country strategies** and use of political economy analysis.
- **Provision of technical and financial support to CSOs** to establish national-local CSO engagement.
- **Establishment of inclusive, multi-stakeholder platforms** to facilitate CSO-government engagement.
- **Integration of citizen engagement with support to government institutions** with oversight and advisory roles.
- **Provision of capacity strengthening support on PDB-CSO engagement** among state and non-state actors.
- **PDB support to enhance political will** and the enabling conditions for CSO engagement.

Traditionally, the WB has been one of the leading institutions to engage CSOs at the country level, and its civil society framework sets out engagement through CPFs, SCD and Country Economic Updates. Increasingly, CSOs are being involved at the country level by the AfDB and the ADB. At the ADB, CSOs in some countries have been engaged in governance assessments, namely public financial management, public procurement, and anti-corruption, which is a good

business case for engaging CSOs. The AIIB does not have a presence in some of the countries in which it operates, making it difficult for CSOs to engage in this manner. At the NDB, CSOs advocated for their inclusion in the development of South Africa's country strategy but were regrettably not included. At the EBRD, the Civil Society Steering Committee is in charge of facilitating country-level engagements, while the IDB also points to the role of ConSocs as a tool for engagement. However, CSOs have questioned the EBRD's approach to politics, which suggests it is outside the Bank's remit to prescribe specific priorities, actions, or indicators to the countries it finances. They have also raised the issue of shrinking civic space more broadly.

The following recommendations are made:

To PDBs

- **Develop guidelines for consultation with CSOs at the country level**, strengthen local-national CSO linkages, and train PDB and country staff on the need for consultation.
- **Consider mechanisms, such as tripartite committees or consultative groups, to facilitate country discussions** and the implementation and evaluation of country strategies.
- **Consider assessments of civic space in countries before agreeing to project funding** and provide safe spaces for CSO engagements at the country level, where civic space is shrinking.
- **Utilise digital technologies to enhance CSO and citizen feedback**, while supporting the protection and promotion of digital space.
- **Integrate citizen engagement with support to government institutions** with oversight and advisory roles (where appropriate).
- **Provide resources for outreach to country-level and local CSOs.**
- **Improve information disclosure to facilitate stakeholder engagement.**
- **Convene regular country-level multi-stakeholder dialogues** and promote the role of CSOs in social accountability.
- **Develop capacity among state and non-state actors** on CESA activities.
- **Enhance political will and the enabling conditions** for CSO and citizen engagement.

To CSOs

- **Continue to advocate for inclusion** in country partnership strategies.
- **In situations where CSOs are not involved in country-level consultation**, highlight good practices from sister institutions.

- **Support PDBs to provide outreach to country-level CSOs**, highlighting shrinking civic space around the world.
- **Provide training to country-level and community-level CSOs** on how to engage PDBs.
- **Strengthen local-national CSO linkages.**

5.4 International level (PDB annual meetings)

At the international level, CSOs can engage senior management through annual meetings or more regular consultations, or they can engage on specific institutional policies. Frequently, CSOs have engaged on access to information and safeguards policies.

5.4.1 International-level analysis (PDB annual meetings)

ADB

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:

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.²⁰⁹

However, CSOs are expected to pay for their own travel and expenses.

The CSO programme is divided into three parts: 1) 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. 2) Civil Society Panel Discussions. These are co-organised with CSOs and cover discussions on development or specific operational topics relevant to ADB operations. 3) Learning with Partners. Here, CSOs, the private sector, and ADB staff share innovative solutions, insights, and experiences on key development themes, showcasing the work of CSOs in development work. The NGOC also organises youth events.²¹⁰

The first regional consultation with civil society took place in 1994. The NGO FORUM

209 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 6 February 2025).

210 As above.

has been particularly active in 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. Since then, various CSOs have engaged in and around Annual Meetings using several approaches – from active participation in panels and discussions, to campaigns and actions challenging decision-makers. However, 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.²¹¹

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 civic space and calling it a threat to development.²¹² 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 annual meetings to call for a complete overhaul and immediate redrafting of the Environmental and Social Framework (ESF).²¹³

AIIB

As noted earlier, the AIIB has only had minimal engagement with CSOs at the project level and does not have country offices. CSOs have attended annual meetings since 2016 but have not been involved in panel discussions. CSOs have noted that the hierarchical structure of the CSO Management Session restricts open dialogue and limits exchanges.²¹⁴ For the 2024 annual meeting, CSOs noted that the inclusion of only two CSO slots announced six weeks before the event, left CSOs little time to prepare. They also noted that the event was held in Uzbekistan, a country categorised as having closed civic space and called for the AIIB to develop protocols to ensure the protection and safety of CSOs participating in the events. Moreover, CSOs have proposed that the Bank commit to creating roundtable discussions between civil society and the AIIB’s Executive Directors (EDs) during the annual meeting.²¹⁵ Other CSOs took these even further by boycotting the annual meetings completely, stating

211 CHRDR (n 100).

212 As above.

213 NGO Forum on ADB ‘Collective Civil Society Statement on ESF Draft: Calling for an overhaul and immediate redrafting’ (13 May 2024) <https://www.forum-adb.org/post/forumesfsubmission> (accessed 6 February 2025).

214 Re-course (n 49).

215 As above.

that this was ‘a symbolic response to the AfDB’s refusal to recognize meaningful civil society engagement within the Annual Meeting format’.²¹⁶

AfDB

At the AfDB, CSOs from the AfDB-CSO Civil Society Forum have been engaged at annual regional and continental CSO forums. These have been separated from annual meetings. However, civil society has criticised this platform, 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’.²¹⁷ The CSO Committee was revitalised in 2024 after it was noted that the Committee lacked influence in strategic decisions, and in terms of accountability and representativity. There was also an absence of monitoring tools.²¹⁸ The new committee will monitor the implementation of the CSO engagement strategy, based on a result-based framework and serves as the interlocutor between the Bank and the broader CSO community.

At the same time, civil society has repeatedly called for CSO participation in the AfDB’s official annual meetings. For example, 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.²¹⁹ In 2018, CSOs 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.²²⁰

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 2023.²²¹ They expressed

216 NGO Forum on the ADB ‘NGO Forum on ADB announces boycott of AfDB Annual Meeting over lack of civil society engagement’ (26 September 2024) <https://www.forum-adb.org/post/ngo-forum-on-adb-announces-boycott-of-afdb-annual-meeting-over-lack-of-civil-society-engagement> (accessed 6 February 2025).

217 Coalition for Human Rights and Development (n 43).

218 As above.

219 Coalition for Human Rights and Development ‘African CSOs urge AfDB to strengthen civil society involvement’ (2016) <https://rightsindvelopment.org/news/african-csos-urge-afdb-to-strengthen-civil-society-engagement/> (accessed 6 February 2025).

220 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://rightsindvelopment.org/news/press-release-csos-urge-afdb-to-promote-the-interests-of-ordinary-africans-over-mega-investors-at-its-annual-meetings/> (accessed 6 February 2025).

221 Coalition for Human Rights and Development ‘Joint statement: AfDB should open space for civil society and communities’ (2023) <https://rightsindvelopment.org/news/joint-statement-afdb-should-open-spaces-for-civil-society-and-communities/> (accessed 6 February 2025).

concern that the Bank had decided to hold its annual meeting in Egypt, where civic space is closed. 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 AfDB 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.²²² Another submission suggested that the Bank create a CSPF, similar to the one that the WB uses in its Spring and Annual Meetings, or the civil society programme in sessions of the ADB.²²³ These suggestions were not implemented. Civil society 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.²²⁴ In June 2024, CSOs issued key recommendations to the Bank, including ensuring their representation at annual meetings.²²⁵

EBRD

At the EBRD, the first CSSC was appointed in January 2024. The CSSC is made up of 13 NGOs and CSO and were chosen on the basis of their geographic and thematic representativeness, as well as strategic priorities. This is an additional platform for collaboration and helps to prepare the Civil Society Programme at EBRD Annual Meetings. Civil society has warned that engagement with CSOs should be mandatory and that the CSSC should not replace public consultation.²²⁶ In response, the EBRD has provided a strong reassurance of its commitment to multi-party democracy and enhanced its 'rights-based' approach to development, as comprised in the EBRD's new ESP, AIP and CSE Approach. Moreover, during the EBRD's annual meeting in Armenia, CSOs raised questions over shrinking civic space in the EBRD region and demanded a clear reaffirmation of the EBRD's commitment to multiparty democracy.²²⁷

222 Coalition for Human Rights and Development (n 43).

223 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 6 February 2025).

224 Coalition for Human Rights and Development 'Civil society groups expelled from AfDB annual meetings' (2024) <https://rightsindevelopment.org/news/afdbam2024-civil-society-expelled/> (accessed 6 February 2025).

225 Coalition for Human Rights and 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 6 February 2025).

226 A Hawser 'Civil society organisations urge EBRD for more human rights action' (2024) <https://www.thebanker.com/Civil-society-organisations-urge-EBRD-for-more-human-rights-action-1706257585> (accessed 6 February 2025).

227 EBRD (n 123).

IDB

As mentioned earlier, the IDB's strategy makes provision for ConSocs to engage at the country and sector level. It also commits to knowledge transfer at annual IDB meetings, and to optimise and fine tune public consultation. It also proposes that it will customise and scale up collaborations for civil society.²²⁸ Before Ilan Goldfajn was elected as IDB president in 2022, the Bank had been closed to civil society scrutiny. For the first time in ten years, civil society was invited to play a role in the IDB's 2024 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.²²⁹ Civil society proactively sent lists of CSOs that should be invited to improve participation, but comments were monitored and they were not given a Q&A session.²³⁰

NDB

At the NDB, civil society engaged the NDB through civil society forums in 2017 and 2018, which were organised at the request of civil society. CSOs engaged NDB officials at the first NDB annual meeting in 2016, with more participation in the second annual meeting in India in 2017, and the fourth annual meeting in South Africa in 2019. During the 2019 meeting, civil society was invited to join one plenary event. In 2024, the NDB arranged a business lunch for CSOs during the Ninth Annual Meeting, which took place in Cape Town, South Africa. The meeting was well-represented by 18 Bank staff, with one representative from South Africa's Department for International Relations and Cooperation (DIRCO) and eight CSOs. However, as previously mentioned, CSOs subsequently called on the NDB to provide adequate time for CSOs to plan and organise logistics for annual meeting attendance and ensure that CSO engagement is meaningful, robust, accessible, diverse, inclusive, and held on the basis of participatory agendas.²³¹ The CSF of the NDB has also tried to extend its engagements with CSOs in other BRICS countries.

WB

At the WB, civil society, namely the CSPF Working Group, coordinates the CSPF at the annual meetings. The CSPF Working Group selects the panel discussions from an open

228 IDB (n 60).

229 Coalition for Human Rights in Development (n 134).

230 Bank Information Centre (n 64).

231 CSF-NDB 'CSO recommendations on the basis of the business lunch between NDB and Civil Society Organisations and Non-Government Organisations on the sidelines of the 9th Annual Development Bank Meeting, 29-31 August 2024, Cape Town South Africa' (2024), obtained through personal communication.



Forus Financing for Sustainable Development working group in Gaborone, Botswana 2024 © Forus

call for proposals. In 2024, this included a townhall with the Bank Group’s President (live-streamed), an in-person roundtable with the Board of Executive Directors, a Bank Group introductory session for CSO representatives new to the meetings, a virtual session on the WB’s Environmental and Social Framework and an overview of CIVIC.²³² This has not stopped civil society from offering critical voices on the need for WB reform, particularly for its economic policies. The WB has been criticised for its strong focus on private finance and deregulation, which CSOs suggest may not serve the public interest, lacks transparency, and pays insufficient attention to human rights.²³³ There have also been calls for an independent review of WB reform and for the Bank to shift from fiscal consolidation towards providing developing countries with the fiscal space to address climate and development goals.²³⁴ After the 2024 annual meetings, some CSOs criticised the WB as offering little substantive reform despite multiple ongoing processes and reviews.²³⁵

CSOs have also advocated for more meaningful engagement at the FiCS, where more than 500 PDBs are expected to attend in 2025.

232 World Bank (n 86).

233 Bretton Woods Project ‘Development to the rescue of finance – the Bank’s “cascade” approach’ (2017) <https://www.brettonwoodsproject.org/2017/07/development-rescue-finance-banks-cascade-approach/> (accessed 6 February 2025).

234 As above.

235 Bretton Woods Project ‘Annual Meetings 2024 Wrap-up – Don’t look back: BWIs plough down path of reforms lacking evidence and willingness to engage with broader UN-led reform processes’ (2024) https://www.brettonwoodsproject.org/publications/world-bank-and-imf-annual-meetings-2024/?utm_source=emailmarketing&utm_medium=email&utm_campaign=bretton_woods_news_lens_14_november_2024&utm_content=2024-11-14 (accessed 6 February 2025).



Case study: CSOs secure a meaningful seat at FiCS

The yearly Finance in Common Summit (FiCS) gathers PDBs from around the world to align financial flows to the 2030 Agenda and the Paris Agreement for Climate Change. The event is an opportunity to strengthen partnerships, improve standards and good practices, and make strategies more sustainable. CSOs have been calling for their meaningful inclusion at the FiCS.²³⁶ Over the years, participation of CSOs in FiCS has evolved. In 2023, CSOs were called to speak at 14 events. Two of these sessions, 'PDBs collaboration with civil society and inclusion of human rights' and 'Strengthening CSO-PDB relations' were led by CSOs. Ahead of the FiCS, CSOs prepared the 2023 Civil Society Declaration on FiCS, signed by around 100 organisations, and comprising recommendations related to human rights, civic space, development finance, climate change, sustainable development, and biodiversity. CSOs raised concerns over the quality and inclusion of development financing, gender, challenges in creating safe spaces for meaningful participation, and ways of strengthening environmental and social safeguards. They also questioned the transparency and democratic oversight of new financial solutions, such as special drawing rights, blended finance, and green bonds. CSOs called for an increase in concessional financing and stressed the need for debt clauses. Ahead of the 2025 FiCS summit, CSOs have again been asked to send in proposals for panel discussions, offering a critical opportunity to initiate deeper dialogues. Moreover, since 2021, CSOs have been engaging with the FiCS secretariat to create a PDB-CSO dialogue working group/coalition. Progress has also been made on a Human Rights working group, established in 2022 with participation by PDBs and CSOs.

236 M Buenaventura Goldman 'Opinion – Influencing the architects of finance: How civil society can impact Development Banks' Forus 30 September 2023 <https://www.forus-international.org/en/custom-page-detail/106076-opinion-influencing-the-architects-of-finance-how-civil-society-can-impact-public-development-banks> (accessed 6 February 2025).

5.4.2 International-level summary and recommendations (PDB annual meetings)

Good practices based on key findings

- **Involvement of CSOs in the development of annual meeting programmes.**
- **Establishment of CSO committees** to facilitate the development of annual meeting programmes.
- **Engagement of CSOs as genuine partners** at annual meetings, with mandatory attendance.
- **Provision of adequate time for Q&A**, deep dives, and feedback.
- **Provision of a variety of different forms of CSO engagement**, such as panel discussions, roundtable discussions with Executive Directors and PDB management, and townhalls.
- **Provision of logistical and financial support to CSOs.**
- **Creation of various avenues for participation**, including virtual engagement.

At the regional/international level, some PDBs provide a specific space for civil society to engage at the annual meetings. The ADB ensures CSO meetings with senior ADB management, has a civil society panel, and showcases innovative CSO solutions. The WB also created the CSPF alongside the annual meetings, which is arranged in conjunction with the CSPF Working Group. At the EBRD, the newly constituted steering committee, the CSSC, will support the development of the civil society programme. At the IDB, after over ten years where civil society engagement in the annual meetings was very limited, the 2024 annual meetings provided more space for CSOs to participate. Meanwhile, the NDB arranged a business lunch with CSOs on the outskirts of the 2019 and 2024 annual meetings. In 2023, CSOs boycotted the AIIB's annual meeting, while others noted challenges of restricted dialogue, the inability to prepare due to late communication, and the event being held in a country with closed civic space. At the AfDB, CSOs have called for their inclusion at annual meetings rather than a separate CSO forum. They have also faced challenges in attending some annual meetings. Across different PDBs, such as the AIIB, AfDB, and EBRD, CSOs have raised issues of shrinking civic space.

The following recommendations are made:

To PDBs

- **Make CSO inclusion at annual meetings mandatory.**
- **Involve CSOs in the development** of the annual meeting programme.
- **Provide opportunities for roundtable discussions** with the PDB's Board of Directors.
- **Consider different models of civil society working groups/committees** to drive civil society platforms at annual meetings and ensure that these are as representative and diverse as possible.
- **Ensure CSOs are given adequate time** for preparing and organising their attendance at the annual meetings and facilitate logistical support in countries where civic space is closed.
- **Provide adequate time for Q&A.**
- **Include various avenues for active participation**, including virtual engagement.

To CSOs

- **Develop guidelines for CSO working groups/committees** to facilitate PDB engagement at annual meetings and ensure these are as diverse and representative as possible.
- **Engage with communities** to ensure that their key concerns are voiced at annual meetings and/or work with PDBs to ensure communities are represented at annual meetings.
- **Continue to highlight the impact of shrinking civic space** on CSO engagement with PDBs, highlighting the negative impact on PDB operations.
- **Coordinate to align messages**, while positioning the diversity of CSOs as a strength.
- **Proactively propose topics for panel discussions.**
- **Conduct evidence-based research** to back up assertions made during panel discussions.



6 PDB-CSO engagement across policies: Access to information, environmental and social safeguards, and gender

CSOs can engage PDBs through their institutional policies. For CSOs, some of the most important policies can be Access to Information policies and Safeguards policies, although others are also relevant, including gender. Access to information is important because PDBs have a public mandate and a duty to share information, which is a basic human right as enshrined in article 19 of the United Nations Universal Declaration of Human Rights (UDHR).²³⁷ Access to transparency can improve governance, transparency, and accountability and enable communities to gather information about projects that are being undertaken. Safeguards policies, on the other hand, are important for ensuring that projects do not have a negative economic and social impact on communities. They can also promote good governance, transparency, and accountability. Beyond this, they can provide opportunities for civil society consultation, inform project design,

237 UN General Assembly, Universal Declaration of Human Rights, 217 A (III), 10 December 1948.

minimise risks, and protect community interests. They can also save money, as the costs of divestment from a project can be more significant than adhering to environmental and social safeguards in the first place. This section analyses CSO engagement with each of the seven PDBs surveyed across these policies. Table 4 provides an overview of this analysis.

Table 4: Overview of PDB-CSO engagement across policies

ADB  ASIAN DEVELOPMENT BANK

Policy issue 1	Policy issue 2	Gender
AIP last updated in 2019 with efforts to improve clear, timely and appropriate disclosure. Multiple submissions made by CSOs including commitments to translation, the appointment of a focal point for handling requests, removing exemptions, overrides and vetoes, an independent appeals panel and stringent information disclosure requirements to disclose information on financial intermediaries including third parties and when using country safeguards system (CSS).	ESF updated in 2024. Application of country systems, but not automatic or mandatory. Problematic flexible terms, including in the application of borrower systems. Standards are not timebound, mandatory, and compliant. Dilution of regulations through mitigation hierarchy approach and a common approach applicable to co-financing.	Operational Plan for Priority 2: Accelerating Progress in Gender Equality (2019-2024). One of the strongest policies among PDBs. Safeguards policy criticised by CSOs as gender blind.

AfDB 

Policy issue 1	Policy issue 2	Gender
AIP 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. No independent appeals panel.	ESF 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.	Gender Strategy (2021-2025). A milestone but falls short on gender and climate change, sexual and gender minorities, SGBV and SEAH, and staffing. Safeguards policy generally weak on gender.

AIIB 

Policy issue 1	Policy issue 2	Gender
PPI adopted in 2018. CSOs submitted inputs, which commended the policy's presumption in favour of access to information but criticised the limited consultation process and emphasised the need for greater community engagement and more human rights focused language.	ESF policy adopted in 2016. Only a few staff at headquarter level dedicated to ESF. Lacks mandatory accountability mechanisms, takes a risk mitigation approach.	Gender action plan adopted in September 2024, but CSOs were not engaged in its development. ESF makes no mention of gender.

Policy issue 1

AIP approved in 2024, to come into effect in January 2025. Two new principles: Proactive disclosure and a harm test. Revised limited list of exceptions, provision of negative override removed.

Policy issue 2

ESP approved in 2024. Policy changes include clarifying the EBRD's commitment to human rights, enhanced human rights requirements for clients, strengthened contextual risk assessment, and alignment with international human rights standards (UNGPs). Additional requirements to assess and manage risks related to retaliation, and a reinforced commitment to assess and address gender risks. ESP includes child safeguarding provisions and the recognition of sexual and gender minorities. ESP 10 details stakeholder engagement.

Gender

Equality of Opportunity Strategy 2021-25 (2021); Strategy for the Promotion of Gender Equality 2021-2025 (2021). One of the strongest policies among PDBs.

Policy issue 1

AIP policy updated in 2024. Criticisms over CSO participation in the consultation process. CSOs emphasised the 'broadly written' exception to country information making it possible for countries to object to virtually any information being published.

Policy issue 2

ESF approved in 2020. More than 60 CSO recommendations now incorporated into an exclusion list including 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. The ESPF now includes a standalone safeguard policy on stakeholder engagement. CSOs have called for a more institutionalised approach to reprisals. Improvements needed on the limitations of commitments, the IDB's discretion to demand compliance, and the explicit transferral of liabilities to the client.

Gender

No specific gender policy. Outlines gender in its Environmental and Social Policy Framework, Standard 9 (2021). Improvements needed in terms of mandate, staffing and M&E. IDB Invest policy fares worse overall.

Policy issue 1

No CSO consultations on policies to date. No engagement in the NDB 5-Year General Strategies (2017 and 2021). ESF established in 2016. A revised Information Disclosure Policy was developed in 2017. CSOs have requested greater information disclosure, that the NDB explain how it puts policy into practice in making sure the client releases information on ESF documents, presumption in favour of disclosure and more active engagement of communities in project design.

Policy issue 2

CSOs have engaged on the accountability mechanism (not yet established). CSOs have called for consultations with stakeholders, including communities affected by projects, making information about the mechanism accessible, ensuring the complaints process has minimal barriers to entry and operational in the case of co-financed projects. CSOs have called for a policy on retaliation.

Gender

No gender policy. General strategy mentions gender in terms of having more women in its organisational structure.

Policy issue 1

ATI launched in 2010. Presumption in favour of disclosure but problematic lists of exceptions. Experts have called for a redaction protocol. CSOs have called for documents to be more accessible to communities (eg translated into local languages, devoid of technical jargon). CSOs called on the WB to include additional information, such as the Operations Manual and information on implementation.

Policy issue 2

ESF released in 2018. Only applied to IFP and not DPF. Emphasises minimal compliance. CSOs have argued that there has been a dilution of safeguards.

Gender

New 2024-2030 Gender Strategy. Concerns over measurement of gender in Corporate Scorecard limited to financial inclusion.
The Hewlett Foundation funded a global consultation with civil society to inform the Gender Strategy. The Gender Strategy advocates for stronger partnerships with CSOs.

6.1 Analysis of CSO engagement with policies

ADB

The ADB publishes its schedule of policies and strategies subject to public consultations on its website. It provides a summary of changes made after the consultation process and produces a stakeholder feedback report.²³⁸ CSOs have primarily engaged through the ADB's

²³⁸ See for example ADB 'Revised Environmental and Social Framework' <https://www.adb.org/who-we-are/safeguards/safeguard-policy-review-en> (accessed 6 February 2025); ADB 'Schedule of policies and strategies subject to public consultations' <https://www.adb.org/who-we-are/about/policy-review> (accessed 6 February 2025).

Access to Information Policy (AIP)²³⁹ and its Environmental and Social Framework (ESF).²⁴⁰ The ADB's AIP, previously called the Public Communications Policy, 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.²⁴¹ However, the review process has been criticised. The NGO Forum has made multiple submissions to the ADB on its policy,²⁴² with the last submission made in 2018, 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).²⁴³ Details of policy implementation and disclosure requirements are provided in ADB's Operations Manual.²⁴⁴

The ADB Safeguards Policy was originally called the 2009 Safeguards Policy and now the proposed ESF. It is worth noting that this framework makes 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.'²⁴⁵

239 ADB 'Access to Information Policy' <https://www.adb.org/documents/access-information-policy> (accessed 6 February 2025).

240 ADB (n 238).

241 ADB (n 239).

242 NGO FORUM on ADB 'Public Information Policy' <https://www.forum-ADB.org/pcp> (accessed 6 February 2025).

243 Both Ends & 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 6 February 2025).

244 ADB 'Operations Manual' <https://www.adb.org/documents/operations-manual> (accessed 6 February 2025).

245 ADB 'Who we are: Safeguards' <https://www.adb.org/who-we-are/safeguards> (accessed 6 February 2025).



Case study: *The ADB's consultations on the ESF*

Context: The ADB's ESF is currently under review.²⁴⁶ To prepare for this review, the ADB undertook 18 analytical studies and held extensive consultations with developing member countries.²⁴⁷ CSOs engaged in the review process for more than two years and attended online and in-person meetings. CSOs have commended the Bank for holding 84 online consultation events, ten in-country consultations, and seven project consultations with directly affected people.²⁴⁸ However, at the 2024 annual meetings, civil society drafted a collective statement demanding an overhaul of the proposed ESF framework.²⁴⁹ The statement alleges that many of the inputs were not meaningfully included and 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 Environmental Impact Assessments

246 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.

247 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 6 February 2025).

248 NGO Forum on ADB (n 213).

249 As above.

(EIAs) and Social Impact Assessments (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 operations²⁵⁰ because the paper fails to identify the ADB Project Cycle and thereby cannot ensure how and when the approach will address project-related harms.²⁵¹ 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.²⁵² The ESF is scheduled for consideration by the ADB's Board of Directors by the end of November 2024 and a summary of stakeholder comments are included in its website.²⁵³

AfDB

The AfDB website also publishes consultations, some of which are open, while others are closed.²⁵⁴ However, the dates of the policies open for comment seem to have already passed, such as the Second Review of the Independent Review Mechanism in 2014, with no recent policies added. Even so, CSOs have offered critiques on the AfDB's Disclosure and Access to Information (DAI) and Integrated Safeguards System (ISS) policies. The AfDB's DAI Policy came into effect in 2013.²⁵⁵ During a review in 2010, civil society raised concerns about the AfDB's lack of transparency about engaging with a broader stakeholder group.²⁵⁶ Furthermore, while the policy requires the Bank to disclose anything that is not on the list of exceptions, the International Accountability Project has 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

250 EIN Press Wire 'NGO Forum network and allies demand accountability from the Asian Development Bank amid Georgia's civic space crisis' (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 6 February 2025).

251 NGO Forum on ADB (n 213).

252 As above.

253 ADB (n 238).

254 AfDB 'Consultations' <https://www.afdb.org/en/consultations> (accessed 6 February 2025).

255 AfDB 'Bank Group Policy on Disclosure and Access to Information: In effect since 3rd February 2013' (2013) <https://www.afdb.org/en/disclosure-and-access-to-information/dai-policy> (accessed 6 February 2025).

256 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 6 February 2025).

and mitigation and disclosure of information on the applicable environmental and social safeguards that have been triggered by the project.²⁵⁷

The DAI policy was reviewed by AfDB staff in 2022 (but not updated), analysing the period 2012-2021.²⁵⁸ The review was generally positive, with very few suggestions for improvements and finding the policy to align with other PDBs' access to information policies. In 2020, 453 requests were made and only two were rejected.²⁵⁹ The number of documents proactively disclosed on the Bank's website has increased significantly, from 700 in 2013 to 3 795 in 2020.²⁶⁰ However, it noted ways to bolster engagement with CSOs and concerned communities, urging revision of the separate but related External Communications Strategy and Policy.²⁶¹ 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. 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.

In 2019, a review of the AfDB's ISS found that it was on par with international best standards, but that certain components could be strengthened, such as gender. The study notes discrepancies between country systems and the Bank's policies in terms of: 1) stakeholder engagement (information disclosure, CSO involvement); 2) the identification and involvement of vulnerable groups; 3) cut-off dates, compensation, and entitlement frameworks; 4) gender mainstreaming; 5) institutional and organisational framework; 6) grievance mechanism; 7) environmental management at the resettlement site; and 8) Monitoring and Evaluation (M&E).²⁶²

257 As above.

258 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 6 February 2025).

259 T McIntosh 'AfDB issues positive report on Access to Information Policy, but finds some issues' *Eye on Global Transparency* 12 July 2022 <https://eyeonglobaltransparency.net/2022/07/12/afdb-issues-positive-report-on-access-to-information-policy-but-finds-some-issues/> (accessed 6 February 2025).

260 As above.

261 As above.

262 IDEV of the AfDB '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 6 February 2025).

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.²⁶³ However, civil society made a submission to the Bank in 2022, arguing that the process had not been as open as it would like.²⁶⁴ In particular, the letter noted that:

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 check 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.²⁶⁵ 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. It further noted that the Bank should monitor the effectiveness and outcomes of project-level grievance mechanisms. The submission also made recommendations on gaps in biodiversity. It suggested a stand-alone Indigenous Person's Policy. The submission also noted that the draft ISS update fails to look at how reprisals may pose a risk to AfDB activities more generally rather than just stakeholder engagement and labour. The ISS also expresses little about measures that the AfDB should take to address reprisals. Finally, the submission called for greater stakeholder engagement and disclosure.

263 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 6 February 2025).

264 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 6 February 2025).

265 Both Ends (n 104).



Case study: Calling for greater PDB responsibility on reprisals

One common issue that has been raised for all PDBs is the issue of reprisals.²⁶⁶ CSOs have developed various reports illustrating the challenges of reprisals and calling for greater accountability from PDBs. For example, a report entitled 'Glass half full' by 11 organisations²⁶⁷ in 2016 examined 758 complaints submitted over the past 21 years to 11 IAMs and found that of all 684 concluded complaints (complaints closed or in monitoring), less than half (43 per cent) were found eligible.²⁶⁸ Just under 20 per cent of concluded complaints resulted in a successfully negotiated settlement (8 per cent) or a publicly disclosed compliance report (11,5 per cent). In addition, PDB management produced action plans in only 7 per cent of concluded cases. The authors therefore assert that communities that are harmed by projects often do not receive adequate remedy. One of the key reasons behind this is that without adequate guarantees of protection, the risk of reprisals may prevent people from filing complaints to IAMs. The report emphasises the need for PDBs to pursue a development model based on human rights. While accountability mechanisms provide a 'vital but crude' backstop for those communities, the report makes recommendations to strengthen the current system, while also calling for a new accountability system. Under this new system, PDBs would take greater responsibility

266 Coalition for Human Rights in Development (n 89); Coalition for Human Rights in Development (n 139).

267 Accountability Counsel; Both ENDS; Centre for International Environmental Law (CIEL); Central and Eastern European Bankwatch Network; Centre for Human Rights and Global Justice, New York University School of Law; Centre for Research on Multinational Corporations (SOMO); Counter Balance; Foundation for the Development of Sustainable Policies (FUNDEPS); Inclusive Development International (IDI); Natural Justice; and Program on International & Comparative Environmental Law, American University Washington College of Law.

268 Centre for International Environmental Law 'Glass half full: The state of accountability in development finance (Jan 2016)' (2016) <https://www.ciel.org/reports/glass-half-full-the-state-of-accountability-in-development-finance-jan-2016/> (accessed 6 February 2025).

for staff and clients by making binding decisions and no longer claiming immunity in national courts.

As noted earlier, in 2023, a study by the Coalition for Human Rights in Development found that most clients play a direct role in reprisal attacks, as they prioritise money over meaningful consultation and avoid disclosing possible risks. In repressive contexts, clients can even take advantage of silencing dissent through state agencies. The study analyses 38 case studies of reprisals in 27 countries and finds that in all but two cases development banks' clients played a direct role in the attacks. In these 38 cases, the clients were allegedly linked to the killing of at least 135 people.²⁶⁹ The report recommends that PDBs should stop delegating reprisal risk assessments to clients and urges them to develop protocols and guidelines. This has been taken up by some PDBs. For example, in 2023, the AfDB developed an anti-retaliation toolkit based on consultations with various civil society organisations.²⁷⁰

AIIB

The AIIB also publishes policies that are open for consultation on its website. However, there are no consultation guidelines, and this approach does not appear to be uniform. The AIIB website appears to summarise inputs from CSOs on certain policies, such as its Policy on Public Information (PPI) policy that was adopted in 2018,²⁷¹ which noted positive developments in the presumption of full disclosure of all information in AIIB's possession, but which CSOs have suggested required greater engagements with communities in AIIB undertakings and more human rights language, with a greater focus on enabling access to documents outlined in the ESF. CSOs also criticised the consultation process as inadequate.²⁷² CSOs also argue that they have not been actively involved in all policy reviews. For example, in 2018, CSOs from Asia, Europe, and Latin America staged a virtual walk-out of the AIIB's consultation of the 2018 Energy Strategy,²⁷³ claiming that there was no time for meaningful engagement.²⁷⁴

269 As above.

270 IRM of the AfDB 'Anti-retaliation toolkit' (2023) <https://irm.afdb.org/en/documents/anti-retaliation-toolkit-en> (accessed 6 February 2025).

271 AIIB 'Policy on public information' (2018) <https://www.aiib.org/en/policies-strategies/public-information/introduction/index.html> (accessed 6 February 2025).

272 As above.

273 AIIB 'Energy sector strategy: Sustainable energy for tomorrow' (2018) https://www.aiib.org/en/policies-strategies/strategies/sustainable-energy-asia/.content/index/_download/2022-AIIB-Energy-Sector-Strategy_Draft-for-Consultation.pdf (accessed 6 February 2025).

274 GAIIA 'Civil Society Groups dismiss Asian Infrastructure Investment Bank's online consultations as neither meaningful nor inclusive' (2018) <https://www.no-burn.org/csos-dismiss-aiib-online-consultations/> (accessed 6 February 2025).

CSOs have noted that participation of civil society was highly constrained, with insufficient prior notification, a lack of willingness to answer questions, and other criticisms.²⁷⁵ CSOs called on the AIIB to commit to publishing a summary of comments received, publicly disclosing information on the expected timeline of the Energy Sector Strategy Update revision and approval process, and publishing a revised draft of the Energy Sector Strategy Update open for a period of public comment prior to Board approval. There has also been no meaningful engagement in the Climate Action Plan or Accountability Framework.²⁷⁶ A key win for civil society has been the AIIB's confirmation from AIIB president, Jin Liqun, that it would not fund any more coal projects in 2020, although the energy strategy has not been updated to reflect this.²⁷⁷

One of the key policies over which CSOs have raised concerns has been the Environmental and Social Framework (ESF), which the AIIB adopted in 2016.²⁷⁸ CSOs have noted that the AIIB's ESF, which has only a few headquarter-based dedicated staff members, is grossly insufficient.²⁷⁹ The AIIB ESF makes provision for proposed projects to contain summaries of environmental and social impacts, as well as for their clients to conduct meaningful consultations with project-affected people.²⁸⁰ However, it has been criticised for falling short of the commitment to 'do-no-harm' and lacking mandatory accountability mechanisms. Moreover, the ESF takes a risk mitigation approach, rather than seeing the benefit of environmental and social policy outcomes in long-term project outcomes and fails to meet international best practice.²⁸¹

275 NGO Forum on the AIIB 'Re: Virtual Consultations Hosted by AIIB on the Energy Sector Strategy Update' (2022) <https://www.forum-adb.org/post/re-virtual-consultations-hosted-by-aiib-on-the-energy-sector-strategy-update> (accessed 6 February 2025).

276 NGO Forum on the ADB (n 216).

277 Dialogue Earth 'AIIB's new no-coal pledge puts spotlight on China's overseas energy investment' (2020) <https://dialogue.earth/en/energy/aiibs-new-no-coal-pledge-china-overseas-energy-investment/> (accessed 6 February 2025).

278 AIIB 'Environmental and Social Framework' (2016) <https://www.aiib.org/en/policies-strategies/framework-agreements/environmental-social-framework.html> (accessed 6 February 2025).

279 Business and Human Rights Resource Centre 'Asian Infrastructure Investment Bank (AIIB) holds consultations on its environmental & social framework, NGOs say process is "grossly inadequate"' (2015) <https://www.business-humanrights.org/it/ultime-notizie/asian-infrastructure-investment-bank-aiib-holds-consultations-on-its-environmental-social-framework-ngos-say-process-is-grossly-inadequate/> (accessed 6 February 2025).

280 Inclusive Development International 'Community Guide to the Asian Infrastructure Investment Bank: An action resource for people affected by AIIB-funded project' (2020) https://www.inclusivedevelopment.net/wp-content/uploads/2020/05/wzw-community-guide-to-the-aiib-participants_compressed.pdf (accessed 6 February 2025).

281 Business and Human Rights Resource Centre (n 279).

EBRD

Like the other PDBs, the EBRD lists any policies and strategies under review on its website.²⁸² CSOs have been engaged on the EBRD's Access to Information²⁸³ and Environmental and Social Policy (ESP)²⁸⁴ frameworks, which both went under review in 2023 and 2024. The EBRD has reflected on this feedback.²⁸⁵ The AIP and ESP were approved by the EBRD Board of Directors on 22 October 2024 and came into effect in January 2025.²⁸⁶

During the AIP consultations, CSOs noted that the AIP is too restrictive, with many exceptions allowing requests for information to be refused. They also criticised the AIP for having no independent appeals panel when requests are denied.²⁸⁷ The new policy states that appeals are submitted to the Information Appeals Panel consisting of the Secretary-General, the General Counsel, and another member of the Bank's Executive Committee designated by the President.²⁸⁸ One of the major changes to the policy includes a Proactive Disclosure and Accessibility principle to reinforce the EBRD's commitment to disclose information in an accessible and user-friendly manner and to promote the Bank's efforts to conduct meaningful stakeholder engagement. The policy also introduces the principle of a harm test, where exceptions to disclosure are limited to information where the Bank has determined that there is a reasonably foreseeable harm from disclosure that would outweigh the benefits. Moreover, the provision of negative override was removed from the AIP to better balance the protection of the legitimate interests of the EBRD's clients/shareholders and its commitment to transparency and accountability. Moreover, the AIP states that the EBRD will engage with a broad range of stakeholders, including project-affected people and communities, civil society groups and members of the public.²⁸⁹

282 EBRD 'Have your say on the EBRD's work' <https://www.ebrd.com/strategies-and-policies/have-your-say.html> (accessed 6 February 2025).

283 EBRD 'Access to Information Policy' <https://www.ebrd.com/documents/strategy-and-policy-coordination/access-to-information-policy.pdf> (accessed 6 February 2025).

284 EBRD (n 124).

285 EBRD 'Consultation on the review of Environmental and Social Policy (ESP) 2019 and Access to Information Policy (AIP) 2019' <https://www.ebrd.com/esp-aip-overview.html> (accessed 6 February 2025).

286 EBRD 'Access to Information Policy' (2024); EBRD 'Environmental and Social Policy' (2024) <https://www.ebrd.com/environmental-and-social-policy-esp-2024> (accessed 6 February 2025).

287 T McIntosh 'CSOs urge EBRD to be more transparent: Existing policies criticized as "insufficient"' *Eye on Global Transparency* 14 June 2024 <https://eyeonglobaltransparency.net/2024/06/14/csos-urge-ebrd-to-be-more-transparent-existing-policies-criticized-as-insufficient/> (accessed 6 February 2025).

288 EBRD (n 286).

289 As above.



Case study: Challenging project disclosure at the EBRD to influence new policy

The International Accountability Project has analysed 195 EBRD projects disclosed between 1 November 2017 and 30 November 2018. It is important to note that this study was done prior to the adoption of the 2024 ESP and AIP but was used to influence these policy discussions. The study found that disclosures on projects fell short of fulfilling communities' right to information,

erecting substantial barriers to access for information and meaningful participation for project-affected communities. Specifically, it found that the EBRD's disclosure of environmental and social impacts and risks under the old policy was weak: relevant environmental safeguard policies, environmental mitigation plans, full environmental impact assessments, and stakeholder engagement plans were routinely not disclosed by the EBRD.²⁹⁰

In the analysis, the International Accountability Project's report showed that only 32 of the 158 projects (20 per cent) provided an overview of the adverse environmental and social impacts likely to result from a proposed project.²⁹¹ The information on how environmental and social safeguards (Performance Standards) were triggered for a project was also lacking, particularly in projects where there were financial intermediaries. Only 5 out of the 158 projects (3 per cent of the dataset) disclosed environmental and/or social management systems for addressing and mitigating

290 International Accountability Project 'In Practice: Information disclosure at the EBRD' (2023) https://accountabilityproject.org/wp-content/uploads/2019/03/In-Practice_-Information-Disclosure-at-EBRD.pdf (accessed 6 February 2025).

291 It is important to note some caveats: only 12 of these projects were categorised as Category A (high risk), where the EBRD routinely discloses information, and only 75% of the projects were active.

adverse impacts. Non-technical summaries of environmental and social impact assessments were disclosed for only 13 out of 158 projects (8 per cent), and the full text of the environmental and social impact assessments was made available for just 5 of the 158 projects (3 per cent). Moreover, only 10 out of the 158 projects (6 per cent) disclosed the actual plans for stakeholder engagement.²⁹² The report also cites the restrictive environment for civil society and communities to engage.

During consultations over the EBRD's AIP and ESP reviews in 2023 and 2024, a joint submission by more than 60 CSOs noted that the EBRD could be more transparent in its approach to project risk assessment and that it should improve its approach to the disclosure of environmental and social information for medium- and low-risk (category B) projects, which comprise most of the EBRD's project portfolio.²⁹³ They argued that the EBRD should regularly disclose environmental and social monitoring reports for all projects to ensure ongoing due diligence and facilitate meaningful stakeholder engagement. It further called on the EBRD to share the responsibility for remedy which currently falls on the client. The EBRD safeguards policy also suggests a management-level grievance mechanism, which CSOs suggested would weaken the EBRD's existing mechanisms, including IPAM.²⁹⁴ Separate CSO comments also complemented this submission, raising concerns over transparency for projects involving financial intermediaries. In this regard, these CSOs called on the EBRD to publish environmental and social documentation for all investments, with greater monitoring requirements, stakeholder engagement, and efforts to address retaliation.²⁹⁵

The feedback from stakeholders has influenced several policy changes. For example, the EBRD's new 2024 ESP has clarified its own commitment to respecting internationally recognised human rights standards in the projects it finances, and its integrated approach to human rights as part of its environmental and social appraisal and monitoring processes. It has also detailed enhanced human rights requirements for clients, referencing the UNGPs, and including a human rights due diligence framework in project appraisal. The 2024 ESP has also strengthened contextual risk assessment, ensuring that human rights risks are considered before project approval.²⁹⁶ In addition, the 2024 ESP introduces various definitions, including on retaliation, relating to abuse and exploitation, gender equality and human rights. It also takes a zero-tolerance approach to retaliation with enhanced client requirements to mitigate

292 As above.

293 Civil society joint statement on the EBRD's draft safeguards (n 122).

294 As above.

295 McIntosh (n 287).

296 EBRD (n 124).

and address risks. The EBRD also became the first Bank to include digital risks in its policies, requiring clients to address these issues.²⁹⁷ Moreover, the EBRD reinforced its commitment to assess and address gender risks, including gender-based violence, harassment, and discrimination, covering sexual and gender minorities. The new ESP reinforces the EBRD's commitment to transparent and inclusive stakeholder engagement. There are also financial commitments to ensure funds for corrective actions that will safeguard displaced people's rights and improved guidelines for engagement with vulnerable people.²⁹⁸ However, the EBRD has argued that it is impractical to apply environmental and social requirements to all projects, given their volume and scope.²⁹⁹

The ESP policy now requires that the EBRD disclose the environmental and social documents for higher-risk Category B projects as part of the project appraisal documentation (prior to Board approval and a stakeholder engagement plan), as well as a non-technical summary with a description of the environmental and social action plan, including any actions relevant to affected people and local communities. For Category A projects, the EBRD will now publish an Environmental and Social Action Plan (ESAP), based on relevance in terms of risk and completion period(s), and summarising Environmental and Social risks, impacts and benefits, and ESAP achievements.³⁰⁰ In response to the concerns over a Bank-level grievance mechanism, the EBRD has asserted that this would not replace IPAM but would formalise the complaint management practice that has been ongoing for years and improve its efficiency.³⁰¹ The EBRD also asserts that the key responsibility for remedy falls with clients, but the ESP specifies the EBRD's responsibility to make sure remedial measures are in place and implemented effectively by clients.

IDB

At the IDB, civil society has engaged the IDB on its Access to Information Policy (AIP) and its Environmental and Social Protection Framework (ESPF).³⁰² However, these policies were reviewed before the change of administration at the IDB, which reprioritised CSO engagement. The IDB now cites public consultation on its website, stating that in 2023 it

297 Personal communication with the EBRD, January 2025.

298 As above.

299 EBRD (n 124).

300 As above.

301 Personal communication with the EBRD, January 2025.

302 IDB 'Environmental and Social Protection Framework' (2020) <https://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=EZSHARE-110529158-160> (accessed 6 February 2025).

conducted the broadest consultation process in its history on its institutional strategy.³⁰³ The IDB's AIP was reviewed in 2019, and then in 2022 and the new policy was approved in June 2024.³⁰⁴ During the initial consultations, civil society accused the Bank of holding limited consultations, which were invite-only.³⁰⁵ Moreover, some have argued that the biggest gap in the policy was the exception for country-specific information, which they claim no other PDB has. Civil society noted that the 'broadly written' exception to country-specific information meant that countries could object to the publication of virtually any information, making it hard for CSOs to access information on country-specific projects.³⁰⁶

During the later review in 2022, a group of civil society organisations 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 makes exceptions more precise and establishes clear criteria for their application and that it incorporates 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.³⁰⁷

In 2023, a civil society group wrote a letter to the IDB stressing that the consultations in the AIP had not been 'meaningful, robust, accessible, diverse, or inclusive, nor are they

303 IDB 'Public consultation process' <https://www.iadb.org/en/who-we-are/institutional-strategy/public-consultation-process> (accessed 6 February 2025).

304 IDB 'Access to Information Policy' (2024) <https://www.iadb.org/document.cfm?id=EZIDB0000576-908968382-778> (accessed 6 February 2025).

305 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 6 February 2025).

306 As above.

307 Coalition for Human Rights in Development 'Recommendations and comments from civil society on the draft Access to Information Policy' (2022) <https://rightsindvelopment.org/news/civil-society-organisations-make-recommendations-to-the-draft-of-the-inter-american-development-banks-access-to-information-policy/> (accessed 6 February 2025).

organized based on participatory agendas'.³⁰⁸ 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.

The IDB's ESPF was approved in 2020. 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 several 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.³⁰⁹ Civil society made submissions on the first and second draft in 2020, which further criticised the consultations as lacking meaningful dialogue with civil society.³¹⁰

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.³¹¹ 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

308 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%EF%BF%BC/> (accessed 6 February 2025).

309 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 6 February 2025).

310 Accountability Counsel 'CSO's recommendations & comments on the IDB Environmental & Social Policy Framework – 2nd Draft' <https://www.accountabilitycounsel.org/wp-content/uploads/2020/11/8-2020-csos-recommendations-on-idb-esp-2nd-draft.pdf> (accessed 6 February 2025).

311 Bank Information Centre (n 64).

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 negotiated by Latin American and the Caribbean people.³¹²

However, CSOs advocated for a more institutionalised approach to assessing the risk of reprisals, with preventative measures and responses to events when they occur.³¹³ Civil society has argued for a greater contextual assessment of risks in the due diligence process, better engagement of stakeholders in project design to prevent and mitigate risks, a protocol to respond quickly to reports of reprisals, and more staff and resources to address the issue of reprisals.³¹⁴ Ongoing criticisms include the limitation of many commitments, the Bank's discretion to demand compliance, and the explicit transferral of liabilities to the client.³¹⁵

NDB

At the NDB, CSOs have not been involved in the design or review of policies, and opportunities for consultation are not published on its website. CSOs advocated to be engaged in the NDB's development of its first and second general strategies, but this suggestion was not taken up. However, CSOs met NDB officials during the first annual meeting in Shanghai, shortly after the Environmental and Social Framework (ESF)³¹⁶ was adopted. CSOs (through the Civil BRICS grouping) have made submissions on how the ESF could be improved,

312 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 6 February 2025).

313 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 6 February 2025).

314 As above.

315 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 6 February 2025).

316 NDB 'Environment and Social Framework' (2016) <https://www.ndb.int/wp-content/uploads/2017/02/ndb-environment-social-framework-20160330.pdf> (accessed 6 February 2025).

including establishing clearer sustainability criteria and due diligence requirements for project selection, supervision and implementation.³¹⁷

The NDB's ESF policy includes a social exclusion list of activities that the NDB is not financing and a high-level commitment to ESF and guiding principles. Like other PDBs, the NDB emphasises the client's responsibility in conducting environmental and social assessments and in meeting the key requirements of involuntary resettlement and compensation and the expectations of Indigenous Peoples. The NDB is responsible for doing due diligence on these assessments, but this information is not available on their website. However, the policy does stress the importance of meaningful consultations with communities, to provide timely and accessible information and ensure that this is gender inclusive and responsive.³¹⁸ The NDB has also recently established an Environmental, Social, and Governance (ESG) department.

CSOs have tested the NDB's commitment to information disclosure in terms of the ESF. In 2018, Oxfam India carried out a study on 'The right to know'³¹⁹ which analysed the NDB's interim Information Disclosure Policy³²⁰ which was released in July 2016, and its ten-page Information Disclosure Policy (IDP) that was released in June 2017. The paper compared this policy against the access to information efforts at the AfDB, the ADB, the IDB and the WB, and made recommendations to bring this in line with good practice. Beyond improving tools for information disclosure, the paper stresses the need for the NDB to create a space for civil society to provide inputs during the framing and/or review of key operational and project-related documents and processes.³²¹

Then, in 2022, the Centre for Human Rights at the University of Pretoria and Oxfam South Africa (OZA) launched a discussion paper entitled 'Enhancing the New Development Bank's practice of information disclosure'.³²² The paper recommended establishing a mechanism to enable access to information and urged the NDB to explain how it puts section 23 of the ESF into practice. This states that:

317 Afrodad (n 68).

318 NDB (n 316).

319 Oxfam India 'The right to know - The NDB's Information Disclosure Policy in a comparative context' (2018) <https://www.oxfamindia.org/workingpaper/6096> (accessed 6 February 2025).

320 NDB (n 316).

321 Oxfam India (n 319).

322 Oxfam South Africa, Centre for Human Rights Pretoria & CSF-NDB 'Discussion paper: Transparency and Accountability Series Discussion Paper 1: Enhancing the New Development Bank's practice of information disclosure: A civil society perspective' (2022) <https://www.oxfam.org.za/wp-content/uploads/2022/06/oxfam-ndb-accountability-discussion-paper-1-web.pdf> (accessed 6 February 2025).

NDB is committed to working with the client to ensure that social and environmental documents are made available in a timely manner, in an accessible place, and in a form and language(s) understandable to affected people and to other stakeholders, including the general public, so they can provide meaningful inputs into project design and implementation.³²³

The NDB committed to disclosing information in the 2022 Information Disclosure Policy (IDP), but CSOs have called for a presumption in favour of disclosure and clarity over how projects are classified. They further raised issues of compliance with its IDP and called for more active engagement of communities at earlier stages of project design.



BB3015

Case study: Using evidence-based research to proactively influence NDB policy

CSOs have engaged the NDB since its inception. This has enabled them to advocate for the NDB, as a relatively young institution, to adopt policies and frameworks in line with other sister institutions and good practices. One of the CSOs emerging from meetings with the NDB's ARC in 2018 has been the creation of an accountability mechanism. In 2022, CSOs engaged with the CSF-NDB released a paper entitled 'Why the need for an Independent Accountability Mechanism (IAM) at the NDB?'.³²⁴ The paper calls for consultations on the development of an IAM, which solicits inputs from different stakeholders, including Project Affected Persons (PAPs),

323 NDB (n 316) 10.

324 Oxfam South Africa, Centre for Human Rights & CSF-NDB 'Discussion paper: Transparency and Accountability Series: Discussion Paper 2: Why the need for an independent accountability mechanism at the New Development Bank?' (2022) <https://www.oxfam.org.za/wp-content/uploads/2022/06/oxfam-ndb-accountability-discussion-paper-2-web.pdf> (accessed 6 February 2025).

CSOs and other community groups. The paper also calls on the NDB to inform all PAPS about this mechanism making all policies and documents easily accessible. It further urges the NDB to ensure that the complaints procedure process has minimal barriers to entry and that its jurisdiction is broad enough to cover all complaints concerning all activities. The paper proposes that the admissibility rules should not require complainants to first exhaust other grievance mechanisms and that the IAM of the NDB be operational in the case of co-financed projects. It also proposes that the NDB develop a strategy to deal with the risk of retaliation.³²⁵

At the launch of the paper, a representative from the NDB's headquarters agreed to share the paper with other relevant staff, while making its policies, procedures, and documents available to the public.³²⁶ In 2024, the NDB confirmed that the roadmap for the IAM was put to the board in 2022 and that the NDB was close to a finalised policy. The NDB has held discussions with peers and has used its observer status at the IAMNet to gather further information on the establishment of such mechanisms. CSO recommendations to the NDB following their business lunch during the annual meetings in 2024 advised the NDB to carry out public consultations on this policy.³²⁷ The NDB's ARC also met CSF-NDB representatives in December 2024, where they agreed to engage civil society more regularly to discuss concerns raised by CSOs and affected communities.

WB

In the past, civil society noted shortfalls in engagement on policies at the WB, including failing to adequately adjust its framework in line with their recommendations, lowering standards during reviews, and failing to outline which options are politically feasible.³²⁸ There have also been contentions over the structure and process of consultations and the ability of the Bank to demonstrate how it has integrated inputs through feedback mechanisms.³²⁹ The WB's Access to Information Policy dates back to 2010. This touted the WB as a transparency leader among PDBs and made all information available that was not on the list of exceptions. However, it has improved its consultation process over time.

325 As above.

326 M Buenaventura Goldman 'Forus presentation on the CSF of the NDB, given at the CSF of the NDB's annual meeting on 24 July 2024'.

327 CSO recommendations (n 231).

328 A Ebrahim & S Hertz 'Accountability in complex organisations: World Bank responses to civil society' (2007) https://www.hbs.edu/ris/Publication%20Files/08-027_18c99232-358f-456e-b619-3056cb59e915.pdf (accessed 6 February 2025).

329 As above.

In 2017, the WB released a report on 'Consultation, participation and disclosure of information' which illustrates good practices that can be shared with others. It identifies the following lessons:

- Identifying all relevant stakeholders and engaging with appropriate representatives is crucial to establishing meaningful consultation and participation.
- Disclosing all critical project-related information, including on potential risks and impacts, in a timely and accessible manner is the foundation for ensuring effective and meaningful participation.
- Timely and accessible consultations that utilise culturally appropriate communication tools and give due consideration to the local context are essential.
- Consultation and participation should be continuous, foster two-way communication and adequately respond to feedback from affected communities.
- Considering the objectives of the different consultation requirements under the WB's safeguard policies is important.

Nevertheless, CSOs have continued to critique the Access to Information Policy for failing to always make documents accessible in the languages of the people that are meant to benefit from them.³³⁰ CSOs have also called for the documents to be more accessible, such as by enabling screen readers and sign language, and by publishing easy-to-read project documents that are devoid of technical jargon. While there are standard disclosure packages for each project, CSOs have stressed the need to include additional information, such as the Operations Manual, which includes information about project location and implementation plans. They should also include additional information about project implementation. Finally, similar to other PDBs, lists of exceptions continue to be a challenge. As such, experts have proposed a redaction protocol (where restricted information is blacked out).³³¹

330 BIC 'What is the future of access to information at the World Bank?' (2020).

331 As above.



Case study: Developing consultation guidelines at the WB

Following the WB's report on consultation, mentioned above, the WB has made efforts to strengthen its consultations. It published Consultation Guidelines in 2019. The Guidelines emphasise that consultations should be 'conducted early in the process when policy, country strategy, programs, or thematic study objectives and approaches are still under consideration. Normally consultations commence after Management and Board approval of the engagement and consultation plan'.³³² The guidelines promote multi-stakeholder engagement but note that the consultation process varies. They commit to providing feedback to consulted stakeholders on how their input was considered to close the feedback loop.

Despite this, there have still been challenges for CSO engagement on WB policies. In 2018, the WB released its Environmental and Social Framework (ESF).³³³ However, the framework was largely deemed unacceptable because the Bank had 'squandered responsibility'.³³⁴ The ESF is only applied to Investment Project Financing (IPF) rather than its most used Development Policy Financing (DPF), which has meant more limited safeguards. It also emphasises minimal compliance with do-no-harm principles, instead of ensuring a positive impact on communities. The ESF also cites consultations through stakeholder engagement plans and grievance mechanisms as its main avenues for engagement,

332 World Bank 'The World Group Consultation Guidelines' (2019) 5 <https://pubdocs.worldbank.org/en/248301574182372360/World-Bank-consultations-guidelines.pdf> (accessed 6 February 2025).

333 World Bank 'The World Bank Environmental and Social Framework' (2017) <https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf> (accessed 6 February 2025).

334 Udall (n 160).

which is more about managing risk rather than proactively engaging communities.³³⁵ In submissions to the WB on the ESF, CSOs emphasised the importance of not diluting any existing safeguards, ensuring upward harmonisation (to the highest existing standards), confirming that policies apply to all WB activities and that safeguards policies are binding and sufficiently detailed to allow the Inspection Panel to review their implementation.³³⁶ CSOs have also demanded that consultation processes should be held before project financing.³³⁷

During the review process, the WB responded that it cannot require the Bank or borrowers to respect human rights as it would risk the Bank becoming a human rights tribunal. They further suggested that human rights norms could not be referenced as not all Bank member states had ratified all human rights treaties.³³⁸ However, CSOs have urged the Bank to take into account the rich jurisprudence developed by human rights tribunals, which understand that human rights are fundamental rights of customary law.

In 2021, the WB requested CSO inputs into its DPF retrospective. CSOs were only asked to provide inputs into the Executive Summary and were not involved in the review's methodology or design, leaving CSOs to conclude that "consultation" processes are used principally to legitimate decisions largely taken and paths largely determined.³³⁹ Some of the biggest critiques of the DPF include the power imbalances often embedded in the creditor-borrower relationship and the need for prior actions (namely, institutional and structural reforms) to be undertaken as preconditions to DPF lending. Civil society has argued that the free-market policy prescriptions have restricted national policy space,

335 Bretton Woods Project (n 80).

336 World Bank 'World Bank Safeguards Review: Overview of CSO concerns' <https://consultations.worldbank.org/content/dam/sites/consultations/doc/migration/OnePageSynthesisofCSOInitialCommentsPaper.pdf> (accessed 6 February 2025).

337 Bretton Woods Project 'Adequate disclosure, public review, and consultation for environmental and social impacts before World Bank Group financing decisions' (2024) <https://www.brettonwoodsproject.org/2024/04/adequate-disclosure-public-review-and-consultation-for-environmental-and-social-impacts-before-world-bank-group-financing-decisions/> (accessed 6 February 2025).

338 Human Rights Watch 'Submission on overarching human rights provisions in the World Bank's Environmental and Social Framework' (2016) <https://www.hrw.org/news/2016/03/15/submission-overarching-human-rights-provisions-world-banks-environmental-and-social> (accessed 6 February 2025).

339 Eurodad 'CSOs issue joint statement following World Bank's "inadequate" consultations on global development policies' (2021) https://www.eurodad.org/csos_issue_joint_statement_following_world_bank_s_inadequate_consultations_on_global_development_policies (accessed 6 February 2025).

and increased poverty and inequality.³⁴⁰ They have suggested that DPF neglects social and environmental risks and that projects are agreed upon behind closed doors.³⁴¹

6.1.1 A spotlight on gender

Civil society has increasingly called for PDBs to pay more attention to gender in their projects, illustrating how projects have undermined the livelihoods and health of women, men, and sexual minorities.³⁴² There are multiple aspects to adopting a gender strategy, including ensuring leadership commitment, the incorporation of gender into all aspects of PDB operations, conducting a gender analysis for projects and country strategies, strengthening internal practices, and ensuring gender-responsive budgeting, with specific targets for projects with gender equality objectives.

In a 2023 report by Gender Action, 12 PDB gender policies were scored, with the ADB and EBRD receiving the highest scores, and the WB scoring the weakest.³⁴³ This is shown in the table below. The full methodology is found in Annex 1 of the Gender Action report. However, it should be observed that, since the report was issued, the WBG released its new and final 2024-2030 Gender Strategy,³⁴⁴ with significant improvements. The Hewlett Foundation funded a global consultation with civil society to inform this strategy, which advocates for stronger partnerships with CSOs.³⁴⁵ The AIIB also released a Gender Action Plan³⁴⁶ after the analysis was published, but CSOs have lamented that they were not included in its development. They have also noted that the AIIB's ESF does not consider gender.³⁴⁷ The NDB

340 Bretton Woods Project 'What is World Bank Development Policy Financing?' (2021) <https://www.brettonwoodsproject.org/2021/03/what-is-world-bank-development-policy-financing/> (accessed 6 February 2025).

341 Bretton Woods Project (n 340). See also Eurodad 'Flawed conditions: The impact of the World Bank's conditionality on developing countries' (2019) <https://www.eurodad.org/flawed-conditions> (accessed 6 February 2025).

342 Gender Action 'Unmet gender promises: Making IFI policies and projects deliver on gender equal rights' (2020) https://genderaction.org/docs/Unmet_Gender_Promises_Report.pdf (accessed 6 February 2025).

343 Gender Action 'IFI's rhetorical gender and climate promises' (2023) <https://www.genderaction.org/pdf/IFIs-Rhetorical-Gender-Climate-Promises.pdf> (accessed 6 February 2025).

344 World Bank 'World Bank Groups Gender Strategy 2024-2030' (2024) <https://documents1.worldbank.org/curated/en/099061124182033630/pdf/BOSIB17e6952570c51b49812a89c05be6a4.pdf> (accessed 6 February 2025).

345 HV Sahni 'How consultations informed the 2024-2030 World Bank Group Gender Strategy WB' (2024) <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099062824185710058/p1796631f0834804d1a1791f651a1ed3a9c> (accessed 6 February 2025).

346 AIIB 'Gender Action Plan' (2024) <https://www.aiib.org/en/about-aiib/who-we-are/infrastructure-for-tomorrow/gender-infrastructure/AIIB-Gender-Action-Plan.pdf> (accessed 6 February 2025).

347 As above.



Indigenous Peoples' protest in Bogotá, Colombia © Sebastian Barros/Forus

“Civil society has increasingly called for PDBs to pay more attention to gender in their projects, illustrating how projects have undermined the livelihoods and health of women, men, and sexual minorities.”

and AIIB are included in the Gender Action analysis, since the NDB does not have a gender policy, and because the AIIB's gender policy was not published at the time the analysis was taken.³⁴⁸

As the Gender Action study shows, the ADB, AfDB, EBRD, IDB, and the WB have specific gender policies/strategies/frameworks. The ADB uses the ADB Operational Plan for Priority 2: Accelerating Progress in Gender Equality (2019-2024).³⁴⁹ The

study finds this to be one of the strongest policies among PDBs. However, the safeguards policy has been criticised by CSOs as gender-blind.³⁵⁰ The AfDB has a Gender Strategy (2021-

348 Adapted from Gender Action (n 343).

349 ADB 'Operational Priority 2: Accelerating progress in gender equality' (2019) <https://www.adb.org/documents/strategy-2030-op2-gender-equality> (accessed 6 February 2025).

350 NGO Forum on ADB (n 213).

2025),³⁵¹ which the study below shows as fairly good, but which falls short on gender and climate change, sexual and gender minorities, SGBV and SEAH, and staffing. The AfDB's safeguards policy is generally weak on gender.

The EBRD has developed the Equality of Opportunity Strategy 2021-25³⁵² and a Strategy for the Promotion of Gender Equality 2021-2025³⁵³ and is considered by the study to have a good gender approach on paper. The EBRD has stated that, rather than being seen as separate documents, these strategies are interlinked and delivered jointly. According to the EBRD, separating these documents is the key driver behind the scoring of some areas as weak.³⁵⁴ The IDB has no specific gender policy but outlines gender in Standard 9 of its Environmental and Social Policy Framework.³⁵⁵ It is considered weak in terms of mandate, staffing, and M&E but otherwise its scores are adequate to good on other policies. Meanwhile, the NDB does not have a gender policy, but the CSF of the NDB has shared the AfDB and the Development Bank of Southern Africa's (DBSA's) gender policies and strategies with the NDB and advocated for a gender strategy to be adopted.³⁵⁶ The study below shows that the WB had one of the weakest policies on gender. While the new policy has made improvements, CSOs have suggested that the Strategy will end up watered down to a limited number of indicators in its new Corporate Scorecard.³⁵⁷ In particular, CSOs have stressed that 'financial inclusion' is not a sufficient indicator of gender and that a more holistic approach is needed to measuring results, capturing the strengths of the new strategy which include valuing public services, recognising different forms of the care economy, and fostering women's human rights.

A summary of the gender assessments for the Banks surveyed in this report is detailed below.

351 AfDB 'The African Development Bank Group Gender Strategy 2021-2025' (2020) https://www.afdb.org/sites/default/files/documents/strategy-documents/african_development_bank_group_gender_strategy_-_2021-2025.pdf (accessed 6 February 2025).

352 EBRD 'The Equality of Opportunity Strategy 2021-2025' (2021) <https://www.ebrd.com/equality-of-opportunity-strategy-2021-25.pdf> (accessed 6 February 2025).

353 EBRD 'Promotion of Gender Equality 2021-2025' (2021) <https://www.ebrd.com/gender-strategy.html> (accessed 6 February 2025).

354 Personal communication with the EBRD, January 2025.

355 IDB (n 302).

356 Personal communication with CSF-NDB.

357 Bretton Woods Project 'World Bank fails to incorporate key elements of new gender strategy in IDA21 policy package and Corporate Scorecard' (2024) https://www.brettonwoodsproject.org/2024/10/world-bank-fails-to-incorporate-key-elements-of-new-gender-strategy-in-ida21-policy-package-and-corporate-scorecard/?utm_source=emailmarketing&utm_medium=email&utm_campaign=bretton_woods_news_lens_14_november_2024&utm_content=2024-11-14 (accessed 6 February 2025).

PDB	ADB	AfDB	AfDB	EBRD	EBRD	IDB	WB
Gender policy documents	Operational Plan for Priority 2: Accelerating Progress in Gender Equality, 2019-20204 (2019)	Gender Policy (2001)	Gender Strategy 2021-2025 (2021)	Equality of Opportunity Strategy 2021-25 (2021)	Strategy for the Promotion of Gender Equality 2021-2025 (2021)	IDB Environmental and Social Policy Framework, Standard 9 (2021)	Gender Strategy (FY 20162023) (2015)
Goals	Strong	Adequate	Adequate	Weak	Adequate	Strong	Adequate
Priorities	Strong	Strong	Adequate	Adequate	Weak	Adequate	Adequate
Mandate	Weak	Adequate	Strong	Weak	Adequate	Weak	Weak
Gender and Climate Change	Strong	Weak	Weak	Strong	Adequate	Weak	Weak
Gender, Environment and Biodiversity	Strong	Adequate	Weak	Weak	Weak	Weak	Weak
Mechanisms	Strong	Strong	Strong	Strong	Strong	Adequate	Adequate
Staffing	Adequate	Weak	Adequate	Adequate	Strong	Weak	Weak
Gender Monitoring and Evaluation	Adequate	Adequate	Adequate	Adequate	Adequate	Weak	Adequate
Sexual and Gender Minorities	Adequate	Weak	Weak	Adequate	Adequate	Strong	Weak
SGBV and SEAH	Strong	Weak	Weak	Adequate	Strong	Strong	Strong
Unpaid care work	Strong	Strong	Weak	Strong	Strong	Adequate	Adequate
Percentage strong	64%	27%	18%	26%	36%	27%	9%
Percentage adequate	27%	36%	36%	45%	45%	27%	45%
Percentage weak	9%	36%	45%	27%	18%	45%	45%

6.2 Policy-level summary and recommendations

Good practices based on key findings

- **Development of clear stakeholder engagement plans** that detail how CSO and community perspectives will be incorporated into policies.
- **Details of consultations published online**, with provision of adequate time for feedback, and an analysis provided of how feedback has been incorporated.
- **Incorporation of principles with the presumption in favour of disclosure** in Access to Information policies.
- **Proactive publication of information**, with disclosure times, formats, channels, and timeframes.
- **Limitations on exemptions, overrides and vetoes** in Access to Information policies.
- **Establishment of independent appeals panels** for access to information.
- **Establishment of ESFs that go beyond risk mitigation**, with active consideration of how to integrate community and CSO perspectives.
- **Alignment of ESFs and client systems** with the UNGPs.
- **Environmental and social impact assessments** on all projects regardless of risk.
- **A zero-tolerance approach to reprisals in ESFs.**
- **Development of safe spaces** to discuss issues of reprisal.
- **Commitment to international standards** in co-financed projects.
- **Development of gender strategies** that include a commitment to assess and address gender risks.

The ADB, AfDB, AIIB, EBRD, and WB publish the details of all public consultations on their website, although the information on AfDB consultations is outdated. In 2023, the IDB began the largest public consultation process in its history, regarding its new strategy. An assessment of this new approach yet has to be done. However, across many of these PDBs, such as the AfDB, AIIB, the IDB, and the NDB, CSOs have argued for more inclusive and diverse consultation, with greater operational support towards consultation processes. CSOs have also faced challenges in having their comments incorporated into revised policy drafts and have argued that engagement has not been meaningful.

While some PDBs, such as the WB and the AIIB, incorporate principles with the presumption in favour of disclosure, lists of exceptions have been highly problematic

across all of these Banks, including the ADB, AfDB, EBRD, IDB, and the NDB. In countries with no rules regulating access to information, getting access to client-based information, such as in the case of the LHWP, is problematic. For this reason, CSOs have been calling for information to be published proactively (including at the AfDB, AIIB, IDB and NDB), with disclosure times, formats, channels, and timeframes. CSOs have called for a greater role of the PDB in ensuring that information is made public when in the public interest and with the potential to cause harm. CSOs have also called for independent appeals panels on access to information at the AfDB and the EBRD, and an uncompromised panel at the ADB.

On safeguards, CSOs have called for binding safeguards that apply regardless of the national context, and which are rooted in human-rights language. The challenges associated with a reliance on country systems has been raised at the ADB, AfDB, AIIB, IDB, and NDB, while at the WB, CSOs have emphasised the importance of safeguards across the entire WB Group's portfolio. CSOs have also requested greater consultation on safeguards assessments, and ideally in project design to alleviate risks and to ensure that projects are designed to benefit communities across all PDBs. They have called for all projects, regardless of their risk classification, to undergo environmental and social assessments (these have been CSO asks at the EBRD and IDB).

In the report, 'More than money', CSOs noted that:

[E]nvironmental and social standards ... are not established in isolation, but rather within particular legal, historical, social and cultural contexts where the conditions affecting human rights can vary greatly. To maintain compliance, human rights conditions must be subject to prior and ongoing assessments, borrowers must have the capacity to manage and uphold human rights within specific contexts, and rights holders must be afforded every opportunity to claim their rights.³⁵⁸

Reprisals, as mentioned throughout this document, also pose significant challenges to projects and undermine the ability of CSOs to engage on environmental and social safeguards. CSOs engaging with the AfDB, EBRD and the IDB have urged PDBs to adopt a zero-tolerance approach to reprisals. CSOs have also urged PDBs to ensure remedy is given to communities. Finally, CSOs have urged co-financed projects to also be subjected to the same level of scrutiny.

358 International Federation for Human Rights (FIDH) & CEE Bankwatch Network 'More than money: Public development banks must strengthen human rights safeguards' (2024) 20 https://bankwatch.org/press_release/more-than-money-new-report-reveals-shortcomings-in-human-rights-policies-of-leading-public-development-banks (accessed 6 February 2025).

The following recommendations are made:

For PDBs

- **Develop clear consultation guidelines** that incorporate CSO and community perspectives into the development of policies.
- **Provide feedback** to demonstrate how CSO inputs on policies have been considered.
- **Ensure that access to information policies incorporate principles** with the presumption in favour of disclosure.
- **Proactively disclose information**, with disclosure times, formats, channels, and timeframes.
- **Limit exemptions, overrides, and vetoes** in favour of the public interest.
- **Establish independent appeal panels** on access to information.
- **Ensure that ESFs set out to actively incorporate community perspectives.**
- **Ensure that country ESF standards are aligned** to the UNGPs and conduct human rights due diligence.
- **Conduct ESFs on all projects**, regardless of risk classification.
- **Adopt a zero-tolerance approach to reprisals** and develop safe spaces for CSO-PDB engagement that do not open communities up to reprisal.
- **Ensure that policies are developed to align** co-financed projects with the UNGPs.

To CSOs

- **Stress the importance of access to information policies** incorporate principles with the presumption in favour of disclosure, continuing to document the challenges of accessing information.
- **Advocate for PDBs to establish independent appeals panels** for requests for information, where these don't exist.
- **Work across coalitions to call for all PDBs to align their ESF frameworks** to the UNGPs.
- **Continue to document examples** of how projects violate policy, across different levels of risk classification.
- **Collaborate across coalitions to hold PDB accountable** to international standards.



Magda Ehlers

7 Conclusion

This study has analysed CSO engagement with the ADB, the AfDB, the AIIB, the EBRD, the IDB, the NDB and the WB. It has examined CSO frameworks and mechanisms for engagement, CSO engagement across project, country and regional/international levels, and CSO engagement across PDB policies. The study finds that proactive, formalised and meaningful engagement with CSOs can lead to more efficient projects and enhanced people-focused, developmental outcomes. CSOs can support the design and implementation of projects, making them more sustainable and community-owned, which in turn reduces the risks involved and prevents PDBs from investing in projects that they are later forced to abandon. PDBs should be able to ensure that projects are undertaken responsibly and should adopt a human rights-based approach to development.

This study has shown that, while PDBs have made significant efforts to enhance their cooperation with CSOs, many gaps remain. CSOs have been included in institutional arrangements at annual meetings, and with some PDBs in the development of country strategies, but at the project level, communities are still not meaningfully consulted. These are the same communities that are sometimes left abandoned, often without any remedy.

Country systems are regularly touted by PDBs as ensuring a more efficient use and allocation of funds, respecting a country's sovereignty and principles on non-interference, and supporting initiatives that are aligned with national development priorities. However, as experience around the world has shown, a PDB is only as strong as the weakest link in the chain, and in some countries where there is limited civic space, country systems pose significant challenges for communities in accessing information or upholding international standards for safeguards.

These are among the reasons why some CSOs have been calling for a UN intergovernmental process to review and transform international financial institutions and overhaul the international financial architecture.³⁵⁹ The FiCS can be a useful additional space in enhancing dialogue about community and CSO perspectives on PDB projects and policies. Through CSO engagement at the FiCS, PDBs can improve their understanding and focus on human rights, gender equality, and the impact of PDB operations on developmental outcomes. For communities, outcomes that reflect equality and inclusion may, for example, be more important than understanding profit or indicators of GDP. By engaging communities and CSOs in project design, PDBs can also begin to monitor the number of projects completed without resulting complaints that lead to divestment. More importantly, they can begin to illustrate how their projects are reaching marginalised and vulnerable populations.

Over the past five years, CSOs have called for a formalised CSO mechanism at the FiCS to strengthen the overall strategy, governance, accountability, transparency, and development outcomes of PDB-related projects and initiatives. They also called for CSOs to be included as an official engagement group at the FiCS, for PDBs to promote and support an enabling environment for civil society and for PDBs to systematically incorporate civic space, human rights, and gender analysis. Since 2020, Forus has been working with the FiCS Secretariat and other PDBs on an initiative towards the strengthening of PDB and CSO relations and is now eager to launch a new FiCS thematic coalition entitled 'Advancing participatory and accountable development through PDB-CSO dialogue'. The coalition seeks to provide a space to foster synergies and cooperation for more inclusive, participatory and accountable development interventions. Forus calls on PDBs to join civil society in building this new coalition in which PDBs and CSOs can work together to build more trusted and transparent relations and cooperate in common areas of interest. In this way, PDBs and CSOs can act together as the change leaders needed to overcome

359 MENAFEM 'Reflection on IMF/World Bank Annual Meetings 2024' (2024) https://menafemmovement.org/reflection-on-imf-world-bank-annual-meetings-2024/?utm_source=emailmarketing&utm_medium=email&utm_campaign=bretton_woods_news_lens_14_november_2024&utm_content=2024-11-14 (accessed 6 February 2025).

the current financial architecture challenges that hinder the ability of governments to protect people and the planet. Working together, the current top-down approach can be transformed to a model where community-led and human rights-based operations are the norm, not the exception.

7.1 Summary of recommendations

7.1.1 To PDBs

PBD-CSO mechanisms

- **Develop a formalised PDB-CSO engagement strategy** if this does not exist, building on existing efforts from PDBs.
- **Ensure that PDB-CSO engagement frameworks (or respective guidelines) detail the types of engagement that CSOs can have with PDBs** (across the project, country/regional, and international levels), the scope, process, and timeframes for meeting, and measures for M&E.
- **Develop measures of meaningful engagement with CSOs**, in close consultation with these CSOs, and develop incentive structures for PDB officials in terms of CSO engagement.
- **Assess civic space in country frameworks and engage with CSOs** on the impact of this on PDB decisions and projects.
- **Train PDB officials on the value-added of civil society** and build their capacity to engage CSOs. This should go beyond the risks of failing to do due diligence, to their potential to build trust and social capital.
- **Ensure that engagements with CSOs are meaningful, accessible, and held based on participatory agendas.** This also means providing CSOs with adequate time to organise ahead of meetings and ensuring there are no challenges to CSO attendance in specific countries.

Project-level

- **Develop metrics for analysing meaningful CSO engagement** in project design, implementation, and monitoring.
- **Go beyond considering CSOs as contractors.** Develop metrics that consider CSO expertise in enhancing social capital and trust, which ensure that communities are adequately consulted in project design so that project risks are minimised, and that sustainability, inclusive development, and innovation are promoted.

- **Develop safe spaces for CSO engagement** at the project level and ensure a zero-tolerance approach to reprisals.
- **Develop guidelines to bring clients in line with good practice.** This relates to CSO engagement at the project level, the use of country systems in conducting human rights due diligence, and structuring and operating an effective grievance mechanism at the project level based on the UNGPs.
- **Bring accountability mechanisms in line with international standards and good practice,** including allowing communities to access this mechanism without having first exhausted project-level grievance mechanisms.
- **Engage CSOs and communities in the drafting of management action plans.**
- **Engage in discussions with sister institutions and CSOs on the right to remedy,** while affirming greater responsibility for PDBs in ensuring the right to remedy through the provision of a remedy fund.

Country-level

- **Develop guidelines for consultation with CSOs at the country level,** strengthen local-national CSO linkages, and train PDB and country staff on the need for consultation.
- **Consider mechanisms, such as tripartite committees or consultative groups, to facilitate country discussions** and the implementation and evaluation of country strategies.
- **Consider assessments of civic space in countries before agreeing to project funding** and provide safe spaces for CSO engagements at the country level, where civic space is shrinking.
- **Utilise digital technologies to enhance CSO and citizen feedback,** while supporting the protection and promotion of digital space.
- **Integrate citizen engagement with support to government institutions with oversight and advisory roles** (where appropriate).
- **Provide resources for outreach to country-level and local CSOs.**
- **Improve information disclosure to facilitate stakeholder engagement.**
- **Convene regular country-level multi-stakeholder dialogues** and promote the role of CSOs in social accountability.
- **Develop capacity among state and non-state actors on CESA activities.**
- **Enhance political will and the enabling conditions** for CSO and citizen engagement.

International Level (PDB Annual meetings)

- **Make CSO inclusion at annual meetings mandatory.**
- **Involve CSOs in the development** of the annual meeting programme.
- **Provide opportunities for roundtable discussions** with the PDB's Board of Directors.
- **Consider different models of civil society working groups/committees** to drive civil society platforms at annual meetings and ensure that these are as representative and diverse as possible.
- **Ensure CSOs are given adequate time** for preparing and organising their attendance at the annual meetings and facilitate logistical support in countries where civic space is closed.
- **Provide adequate time for Q&A.**
- **Include various avenues for active participation,** including virtual engagement.

Policy-level

- **Develop clear consultation guidelines** that incorporate CSO and community perspectives into the development of policies.
- **Provide feedback to demonstrate** how CSO inputs on policies have been considered.
- **Ensure that access to information policies incorporate principles** with the presumption in favour of disclosure.
- **Proactively disclose information,** with disclosure times, formats, channels, and timeframes.
- **Limit exemptions, overrides, and vetoes** in favour of the public interest.
- **Establish independent appeal panels** on access to information.
- **Ensure that ESFs set out to actively incorporate** community perspectives.
- **Ensure that country ESF standards are aligned** to the UNGPs and conduct human rights due diligence.
- **Conduct ESFs on all projects,** regardless of risk classification.
- **Adopt a zero-tolerance approach to reprisals** and develop safe spaces for CSO-PDB engagement that do not open communities up to reprisal.
- **Ensure that policies are developed to align** co-financed projects with the UNGPs.

7.1.2 To CSOs

PBD-CSO mechanisms

- **Develop formalised networks and focal points for engagement**, where these don't exist.
- **Strengthen digital communications on PDB-CSO engagement**, such as through newsletters, and through virtual and in-person CSO consultations.
- **Provide inputs to PDBs on the value-added of CSO engagement and the different areas in which CSOs can engage**, as well as what meaningful engagement means for CSOs.
- **Document case studies to highlight where CSO engagement with PDBs** has led to better developmental outcomes.
- **Assess existing guidelines on consultation from PDBs** for CSO engagement to highlight good practices and suggest improvements where needed.
- **Develop and share CSO databases among CSO coalitions and PDBs** on thematic issues and proactively provide PDB focal points with CSO databases to ensure that consultations are diverse and inclusive.
- **Raise awareness among PDBs on shrinking civic space** in parts of the world.
- **Build capacity for engaging PDBs among communities** and local/national CSOs.

Project-level

- **Promote a human rights and community-centred approach** to project design within PDBs.
- **Continue to monitor the negative consequences of projects** that are implemented without due diligence, illustrating the costs of divestment.
- **Propose metrics to capture the value added of community/CSO engagement** with PDBs at the project level.
- **Work with PDBs to ensure guidance is given to the client** on effective project grievance mechanisms based on the UNGPs, with a zero-tolerance approach to retaliation.
- **Emphasise the need for a stronger PDB monitoring role** in the use of country systems.
- **Advocate for PDBs to ensure remedy.** Gather community perspectives on what the right to remedy constitutes and use this to influence discussions.
- **Continue to advocate for responsible exit plans**, documenting cases where communities have not had access to remedy as a result of divestment.
- **Raise awareness on country-specific challenges with civic space.**

Country-level

- **Continue to advocate for inclusion** in country partnership strategies.
- **In situations where CSOs are not involved in country-level consultation**, highlight good practices from sister institutions.
- **Support PDBs to provide outreach to country-level CSOs**, highlighting shrinking civic space around the world.
- **Provide training to country-level and community-level CSOs** on how to engage PDBs.
- **Strengthen local-national CSO linkages.**

Annual meetings

- **Develop guidelines for CSO working groups/committees** to facilitate PDB engagement at annual meetings and ensure these are as diverse and representative as possible.
- **Engage with communities to ensure that their key concerns** are voiced at annual meetings and/or work with PDBs to ensure communities are represented at annual meetings.
- **Continue to highlight the impact of shrinking civic space** on CSO engagement with PDBs, highlighting the negative impact on PDB operations.
- **Coordinate to align messages**, while positioning the diversity of CSOs as a strength.
- **Proactively propose topics for panel discussions.**
- **Conduct evidence-based research** to back up assertions made during panel discussions.

Policy-level

- **Stress the importance of access to information policies** incorporate principles with the presumption in favour of disclosure, continuing to document the challenges of accessing information.
- **Advocate for PDBs to establish independent appeals panels** for requests for information, where these don't exist.
- **Work across coalitions to call for all PDBs to align** their ESF frameworks to the UNGPs.
- **Continue to document examples of how projects violate policy**, across different levels of risk classification.
- **Collaborate across coalitions to hold PDB accountable** to international standards.

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Indigenous Peoples' protest in Bogotá, Colombia © Sebastian Barros/Forus

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