

# UNDERSTANDING THE AFRICAN DEVELOPMENT BANK

A guide for Civil Society Organizations and Communities



## “Understanding the African Development Bank: A guide for civil society organizations and communities” (April 2023)

This report was an initiative of the CSO working group on the African Development Bank, with contributions from the following members of the Coalition for Human Rights in Development: Accountability Counsel, Arab Watch Coalition (AWC), Bank Information Center (BIC), Both ENDS, Center for International Environmental Law (CIEL), International Accountability Project (IAP), and Lumière Synergie pour le Développement (LSD). The views expressed herein, and any errors or omissions, are solely the authors’.

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# Introduction

Since 1964, the [African Development Bank \(AfDB\)](#) group has been funding projects, providing loans and grants to governments, and investing in private companies across the African continent. It has supported poverty-reduction and livelihoods programmes, but also harmful large-scale projects, such as coal plants, mega hydroelectric dams and polluting fertilizer factories.

The AfDB has the power to shape the development agenda of all African countries. Its projects — for good or bad — are directly affecting the lives of millions of people.

The AfDB is funded by its member countries, which are both regional and non-regional. As it spends public money, it should support projects that truly serve the interests of local communities, and its primary beneficiaries (African people) should be able to participate in the AfDB's decision-making processes. However, spaces for meaningful engagement and participation of civil society organizations (CSOs) and communities in vulnerable or marginalized situations (including Indigenous Peoples, women, children, people with disabilities) are often severely limited.

Similarly to other multilateral development banks, over the years the AfDB has developed specific policies to promote access to information, transparency, environmental and social safeguards, and accountability. However, it often fails to implement them properly. It is crucial for civil society groups working on development and human rights issues to be aware of these policies, to become familiar with the tools and processes to call attention when they are not implemented properly, and

to participate in their review processes, so as to hold the bank accountable and advocate to the AfDB to improve its policies and practices.

This guide, co-produced by members of the AfDB CSOs Working Group, is intended to serve as a tool for communities and CSOs that would like to join the collective struggle to hold the AfDB more accountable and transparent, to ensure its projects do not harm people and the planet, and to let local communities decide their own development priorities and pathways.



*Fisherwomen affected by the AfDB-funded Sendou coal plant, in Senegal. Credit: Lumière Synergie Développement (LSD, Sénégal).*

# The African Development Bank Group



**82** member countries:  
54 regional and 28 non-regional.

## What is it?

The African Development Bank group (AfDB), established in 1964, is the main development finance institution in Africa. It has 82 member countries: 54 are regional and 28 are non-regional.

The AfDB Group is made up of:

- A parent institution: the African Development Bank (AfDB).
- Two lending institutions:
  - The African Development Fund (ADF).
  - The Nigeria Trust Fund (NTF).

The AfDB's main **objective** is to spur sustainable economic development and social progress in Africa, thus contributing to poverty reduction.



The AfDB is in Abidjan (Côte d'Ivoire).

## Where is it located?

The headquarters of the AfDB is in Abidjan (Côte d'Ivoire). It also has:

- 34 offices across Africa (some covering several countries),
- 2 resource centers in Kenya and South Africa,
- an external office in Japan.

Since 2011, the institution has been implementing a decentralization road map, to bring decision-making closer to the beneficiaries.

## Who makes decisions?

### Board of Governors

It is the highest decision-making body.

Each member country appoints one Governor and one Alternate Governor for the Board (generally Ministers of Finance or Economy, Central Bank Governors, or other high-ranking officials). They serve for a five year term and meet yearly during the AfDB Annual Meetings.

### Board of Directors

It is one of the core decision-making bodies of the AfDB, responsible for conducting and approving all the general operations.

The Board of Directors comprises 20 members: 13 are elected by the governors of regional countries and seven by non-regional member countries, for a term of three years renewable once. Directors are based at the AfDB headquarters in Abidjan.



**5** decision-making parties.

**The President**

The AfDB President is elected by the Board of Governors for a five year term, renewable once. The President is in charge of the daily management of the bank, under the direction of the Board of Directors, with the support of a Chief Economist and five Vice Presidents.

**Oversight**

The activities of the AfDB Group are overseen by an Audit Department, an Independent Evaluation Department and an Internal Administrative Tribunal.

**Voting powers**

The AfDB Member States exercise a voting power proportional to the amount of money they contribute to the AfDB.

As of 2022, the regional country members with the highest voting power are Nigeria, Egypt, South Africa, Algeria and Ivory Coast, while the non-regional are the United States, Japan, Germany, Canada and France.

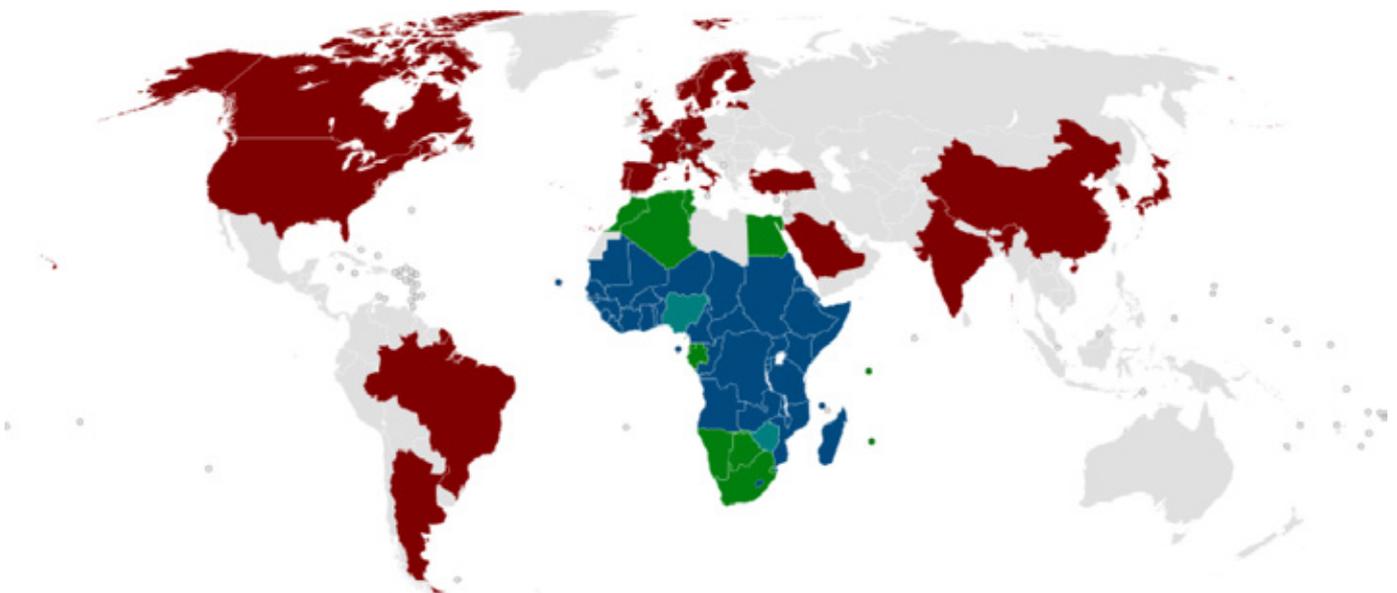


**ADVOCACY TIP**

Knowing who makes decisions within the AfDB is crucial for your advocacy strategy. Building relationships and alliances with the Executive Directors, especially those relevant for your country or those with the highest voting powers, can help influence the AfDB’s decisions.

**How do the different AfDB Group entities operate?**

- AfDB Beneficiary Countries
- ADF Beneficiary Countries
- AfDB and ADF Beneficiary Countries
- Non-African Member Countries



*Credit: African Development Bank.*

### African Development Bank

It gives loans to governments in middle countries (e.g. South Africa, Morocco, Tunisia) and various types of financial assistance to private companies investing in Africa. The interest rates are similar to those of commercial banks and the loans have to be paid back in 5-20 years depending on the type of contract.

### African Development Fund

It provides concessional funding (interest-free) and grants (that don't have to be paid back) for projects and programs, including technical assistance and capacity building. Its main objective is to reduce poverty and it supports both the public and private sectors in the 38 least developed African countries.

### Nigeria Trust Fund

It is a self-maintained revolving fund which also acts as a concessional arm, assisting the least developed African countries. The main difference with the ADF is that the NTF only allocates resources to projects, and not to countries.

## AN INTRICATE WEB OF FINANCIAL FLOWS

AfDB's financial solutions to non-sovereign clients comprise loans, lines of credit, guarantees, equity and quasi-equity, trade finance and risk management products, as well as technical assistance. Similarly to other development institutions, it also provides part of its support via financial intermediaries. These financial flows often lack transparency and it is therefore often more difficult to track where funding is going and hold recipients accountable to environmental and social standards.

The AfDB, together with some African governments, has also established [Africa50](#), an entity that aims to help “bridge Africa's infrastructure funding gap by facilitating project development, mobilizing public and private sector finance, and investing in infrastructure on the continent.”

## How does the AfDB set its investment priorities?



*The five main priority areas of the AfDB. Credit: AfDB.*

**10 year strategy paper:** it sets the main directions of the bank; the **next strategy** (2023-2033) is expected to provide a vision for how the bank plans to “accelerate Africa's inclusive, green and resilient growth and development”.

**High 5s'**: they are five main priority areas announced by the AfDB President in 2015 and they include: Light up and Power Africa; Feed Africa; Industrialize Africa; Integrate Africa; and Improve the Quality of Life for the People of Africa.

**Country Strategy Paper (CSP)**: they set the priorities at the country level. They are reviewed every 5 years and they are usually aligned with the countries' national development agenda, the AfDB 10 year strategy and the High 5s'.



### ADVOCACY TIP

Country Strategy Papers should be developed in a participatory way, with meaningful engagement from civil society. Any organizations can contact the relevant AfDB [country office](#) and request to participate in the drafting and revision of the CSP. Civil society can also engage in the revision of the 10 year strategy.

## The AfDB and human rights

The AfDB, according to its mandate and founding documents, considers economic and social rights as an integral part of human rights.

The bank affirms it respects the principles and values of human rights as set out in the [United Nations Charter](#) and the [African Charter on Human and Peoples' Rights](#), and these principles guided the development of the Integrated Safeguards System (see section below). The AfDB encourages country members to abide by international human rights standards, norms and good practices, based on their commitments under international human rights treaties and the African Charter on Human and People's Rights.

The AfDB has human rights obligations, stemming from the human rights obligations of its member states and its status as an international organization, and should follow the guidelines and recommendations applied to all types of business entities, such as the [UN Guiding Principles on Business and Human Rights](#).

Recently, the AfDB has also made specific commitments to tackle climate change, including allocating more funding to climate finance and green growth. It also announced it will stop investing in coal-fired power plants, but it is yet to mandate consistency with the objectives and requirements of the [Paris Climate Agreement](#) (2015), [Glasgow Climate Pact](#) (2021), and regional member countries' [National Determined Contribution](#) under the United Nations Framework Convention on Climate Change.



Women collect firewood in the countryside in Sierra Leone.  
Credit: Annie Spratt – Unsplash

# Civil Society and the African Development Bank

## Why should civil society care about the AfDB?

### 1. The AfDB's operations can directly/indirectly impact you or your community.

The AfDB's operations may affect you directly, such as by financing the construction of a road, dam or mining project that ends up displacing you, affecting your livelihood and polluting your territory. It may also have a more indirect impact, when the bank lends money for budget support or policy reforms that affect your country's healthcare or water supply system or that increase the level of public debt.

### 2. The AfDB is a public institution, with unique obligations and responsibilities.

As a public bank, represented by government officials, the AfDB is supposed to serve the interests of the African people, and especially the poorest and more marginalized groups. Its funds are public, as they come from its member states. The government representatives, sitting on its Board of Executive Directors, should be accountable to the public constituencies they represent.

### 3. The AfDB should stay true to its commitments and be held accountable.

In its mandate and its safeguards policies, the AfDB has committed to spur sustainable development, respect human rights, and ensure transparency and participation. It should be accessible to civil society and CSOs, human rights defenders and local communities should be able to raise questions and concerns about its activities without fearing reprisals.

### 4. The AfDB is an international organization.

As the AfDB is a multilateral development bank and it contributes to shaping the global development agenda, engaging with it can also help attract international attention to the human rights and development issues you care about.



Civil society groups holding a demonstration during the 2022 AfDB Annual Meetings. Credit: Lumière Synergie Développement (LSD, Senegal)

## How can civil society engage with the AfDB?

Some possible entry points, advocacy targets and opportunities include:

**Project level:** monitor projects to compare between commitments on paper and in reality; engage with project-affected communities; share findings with relevant government implementers and AfDB project team staff.

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

**Regional level:** participate during the AfDB CSO forums, policy reviews, Annual Meetings.

**International level:** engage with international governments such USA, UK, Norway, etc. and Executive Directors in those international fora where the AfDB participates.

### AfDB Civil Society Engagement Framework

In 2012, the AfDB adopted the CSO Framework for enhanced engagement with Civil Society Organizations which is consistent with its Ten-Year Strategy. The CSO Engagement Framework is designed to structure the AfDB's broader and deeper engagement with CSOs through three dimensions; outreach, dialogue, and partnership, carried out at the corporate, regional/country, and project levels. The overarching objective of the framework is to help the AfDB achieve greater results and impacts through improving its collaboration with CSOs and strengthening the mechanisms for participation and coordination.

### AfDB Civil Society Committee

In 2018, during the Civil Society Forum that took place in Abidjan, the bank revitalized the CSO Committee. The mandate of the Civil Society Committee is to advise the bank on forging stronger relations and partnerships with the CSO community and help hold the bank accountable for the implementation of the Civil Society Engagement Strategy. The Committee has a maximum of 20 members. Half of the Committee members represent civil society organizations and the other half the bank. The term of each Committee is for a period of 2 years. CSO members are invited to join the Committee by invitation of the Committee Chair, based on a selection process designed by the bank.



Civil society groups holding a demonstration during the 2022 AfDB Annual Meetings. Credit: Lumière Synergie Développement (LSD, Senegal)

# Policies



## ADVOCACY TIP

For CSOs wishing to engage in advocacy activities with the AfDB, it is important to be familiar with the main AfDB policies, frameworks and mechanisms, such as: the [Disclosure and Access to Information Policy](#), the [CSO Engagement Framework](#) and the [CSO committee](#), the [Integrated Safeguards System](#), the [Independent Recourse Mechanism](#), and the [Integrity and Anti-Corruption Policy](#).

## 1. Policy on Disclosure and Access to Information (DAI Policy)

Under the [DAI policy](#), effective since 2013, all information held by the AfDB should be made public, unless it is on a list of exceptions and there is a compelling reason for confidentiality.<sup>1</sup>

The DAI policy aims to: maximize disclosure of information; facilitate access to and share information with a broad range of stakeholders; promote good governance, transparency and accountability; improve on implementation effectiveness and better coordinate the information disclosure processes; give more visibility to the bank strategies and activities; support the consultative process; and strengthen harmonization with other development banks on information disclosure.

### Simultaneous Disclosure

According to the DAI Policy, some documents classified as “public” should be available to the public before Board consideration and approval. These, for example, include operational policies and sector strategies, country and regional strategy papers, and loan proposals.

### Where to find Documents

The AfDB publishes key strategic documents and policies on its [website](#). Project information, including information about environmental and social risks, can be found on the AfDB’s [project portal](#).

### Request for Information

Any information on the AfDB’s operations can be requested through the [DAI Request Form](#). If the request is denied, the bank’s decision can be appealed:

**Stage 1: Information Disclosure Committee (IDC):** when requesters believe their request for information has been unreasonably denied, or

when they are able to make a public interest case to override the DAI Policy exceptions, they can file an appeal at the IDC, within 50 days of the bank’s decision to deny the request: [IDC.RRDC\\_Secretariat@AFDB.ORG](mailto:IDC.RRDC_Secretariat@AFDB.ORG)

The IDC Secretariat should acknowledge receipt of the appeal within 5 working days and notify the decision within 40 working days, providing either the requested information or the reasons for denial. The bank should also post on its website the appeal decision taken in each case.

**Stage 2: Appeals Panel:** If the IDC confirms the initial bank’s decision, the requester may in some cases file an appeal to the Appeals Panel, whose decision will be the final one. The panel is composed of three members, and two of them are external to the bank.

<sup>1</sup> In 2022, the AfDB published a [report](#) on the implementation review of the policy, which has been [criticized](#) by several CSOs because the process was not transparent, inclusive and participatory.

## 2. The Integrated Safeguards System (ISS)

Environmental and social safeguard policies serve as an important “foot in the door” for CSOs and communities seeking to hold development banks such as the AfDB accountable. Safeguards are rules and policies that aim to identify and mitigate risks in the context of the activities supported by the bank, and ultimately prevent environmental and social harms from occurring.

The AfDB Executive Board approved the ISS in 2013. Following an [evaluation](#) by the AfDB’s Independent Development Evaluation (IDEV) group in 2019, the ISS underwent a review involving internal and external consultations in 2021 and 2022. In April 2023, the Executive Board approved the updated [Integrated Safeguards System \(ISS\)](#).

The updated ISS - expected to go into effect in 2024 - aims to fill gaps in AfDB policy on issues including community health and safety, gender-based violence, Indigenous Peoples, inclusion of marginalized groups, and stakeholder engagement.



Civil society groups holding a demonstration during the 2022 AfDB Annual Meetings. Credit: Lumière Synergie Développement (LSD, Senegal)

The updated ISS comprises:

- 1. The AfDB Group’s Vision for Sustainable Development**, which sets out the bank’s approach and aspirations regarding environmental and social sustainability.
- 2. The AfDB Group’s Environmental and Social Policy**, which sets out the bank’s commitments and the relevant principles and requirements that the bank must follow regarding projects, activities and initiatives that it supports.
- 3. Ten Environmental and Social Operational Safeguards (OSs)**, which set out the mandatory requirements that borrowers must apply to the projects, activities and initiatives for which they receive support from the AfDB Group.
- 4. Environmental and Social Guidance Notes**, which provide technical guidance for the bank and its borrowers on specific methodological approaches, Good International Industry Practice (GIIP) and standards relevant to meeting the requirements of the Operational Safeguards. Bank’s ISS Guidance Notes are supplemented where necessary by the World Bank Group Environmental, Health and Safety (EHS) Guidelines that were adopted by the Multilateral Finance Institutions (MFI) Working Group on Environment. The guidance notes provide advisory information and are not mandatory.

## Scope of Application

The AfDB Environmental and Social Policy and the OSs apply to all Bank Group's funded operations regardless of the type and source of financing.

The 10 E&S Operational Safeguards (OSs):

- 1. OS1: Assessment and Management of Environmental and Social Risks and Impacts** - OS1 requires that borrowers identify, assess, and manage environmental and social risks associated with a project, including through conducting an environmental and social assessment during the project preparation stage. Projects are classified by the level of overall environmental and social risk, and OS1 establishes a mitigation hierarchy which instructs borrowers first to anticipate and avoid risks and impacts; then to minimize or reduce risks and impacts to acceptable levels; then once risks and impacts have been minimized or reduced, mitigate; and finally, where significant residual impacts remain, compensate for or offset them.
- 2. OS2: Labour and Working Conditions** - the objective of OS2 is to promote health and safety at work whilst recognizing the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. OS2 requires that borrowers provide safe labor and working conditions in bank-financed projects. OS2 prohibits the use of forced or child labor in bank-financed projects. Borrowers must provide a grievance mechanism for project workers, including sub-contracted workers.
- 3. OS3: Resource Efficiency and Pollution Prevention and Management** - OS3 sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life cycle in a manner consistent with Good International Industry Practice (GIIP). OS3 requires borrowers to promote the sustainable use of resources, including energy, water, and raw materials, while avoiding or minimizing adverse impacts on human health and the environment caused by pollution from project activities, project-related emissions of short and long-lived climate pollutants, generation of hazardous and non-hazardous waste, and risks and impacts associated with pesticide use. OS3 requires borrowers to estimate gross GHG emissions, where feasible, and to apply World Bank Group's Environmental Health and Safety Guidelines and other GIIP.
- 4. OS4: Community Health, Safety and Security** - OS4 addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of the Borrower to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable. It also specifies that threats to human security include reprisal risks.
- 5. OS5: Land Acquisition, Restrictions on Access to Land and Land Use, and Involuntary Resettlement** - The objective of OS5 is to avoid involuntary resettlement where feasible, or minimize resettlement impacts where involuntary resettlement is deemed unavoidable after all alternative project designs have been explored. OS5 defines the types of involuntary displacement



Community of the Saloum Islands for the greening of AfDB investments.

(including economic displacement) that can result from development projects. It defines who borrowers must consider as impacted people by involuntary resettlement (including those who do not have formal claim to the land that they use or live on). OS5 lays out a process for developing a Resettlement Action Plan for mitigating adverse impacts in projects where there are potential involuntary resettlement impacts.

- 6. OS6: Habitat and Biodiversity Conservation and Sustainable Management of Living Natural Resources** - OS6 requires borrowers to protect and conserve biodiversity and habitats, apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity, and support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities.
- 7. OS7: Vulnerable Groups** - OS7 directs borrowers to identify vulnerable groups and individuals including highly vulnerable rural minorities (Indigenous People) as early as possible in bank's operations and to meaningfully engage with them, taking into account individuals' and communities' specificities, and engage with them in an appropriate form, manner and language. Projects that impact highly vulnerable rural minorities can only proceed if free, prior, and informed consent (FPIC) is sought and received from these communities prior to the project commencing, and must be maintained throughout the project's life cycle with continued provision of current project information and dialogue.
- 8. OS8: Cultural Heritage** - OS8 requires borrowers to protect cultural heritage from the adverse impacts of project activities and support its preservation, address cultural heritage as an integral aspect of sustainable development, promote meaningful consultation with stakeholders regarding cultural heritage, and promote the equitable sharing of benefits from the use of cultural heritage.
- 9. OS9: Financial Intermediaries** - OS9 addresses the environmental and social requirements associated with intermediated financing through financial and non-financial institutions. Financial Intermediaries (FIs) are banks or other institutions that have their own lending/financing portfolio to finance development projects. OS 9 requires that when the AfDB provides funds to an FI, the FI must have in place environmental and social systems, and create an Environmental and Social Management System (ESMS) for the project. It requires that FIs engage with stakeholders and disclose the ESMS through the FI's website, if a website exists, and permit, in writing, the AfDB to disclose it on its website.
- 10. OS10: Stakeholder Engagement and Information Disclosure** - the objective of OS10 is to establish a systematic approach to stakeholder engagement that will help borrowers identify stakeholders, build and maintain a constructive relationship and channels of communication with them throughout the project cycle. It requires that borrowers identify all stakeholders of a project, including those who stand to benefit or are at risk of facing negative impacts as a result of the project, with particular attention to vulnerable groups including highly vulnerable rural minorities. OS10 requires borrowers to facilitate meaningful consultations with all stakeholders by providing stakeholders with timely, relevant, understandable and accessible information, and consulting with them in a culturally appropriate manner that is free of manipulation, interference, coercion, discrimination, intimidation and reprisal. It instructs borrowers to develop a Stakeholder Engagement Plan (SEP) to detail how all stakeholders will be informed and consulted on project risks and impacts throughout the project life cycle, and the process and means by which grievances can be raised and will be addressed, including information about the project grievance mechanism and the bank's Independent Recourse Mechanism (IRM).

### Why is the Integrated Safeguards System important for civil society groups and communities?

The bank's ISS provides critical leverage points for local communities. These environmental and social protections are written into loan agreements, converting bank policy into a legal obligation of the borrower. Specific requirements in the updated ISS guarantee civil society, communities, and the general public's access to project information and provide openings to give input to project teams about projects in which they have an interest. Where local authorities are reluctant to uphold these commitments, communities can turn to the bank as another means of applying pressure to assert their rights. If communities are facing harm due to a project and believe the project is not in compliance with the bank's policies, they can lodge complaints to the bank's independent accountability mechanism, the IRM.

# When rights are violated: holding the AfDB accountable through the Independent Recourse Mechanism

The **Independent Recourse Mechanism (IRM)**, established in 2004 (and previously known as the Independent Review Mechanism), was designed to ensure the AfDB complies with its own policies and procedures during the design and implementation of its projects. It provides people adversely affected by AfDB projects an avenue to submit their complaints, hold the bank accountable, and demand access to remedy.

Filing a complaint at the IRM is only one of the ways to hold the bank accountable, most effective when combined with other strategies. In this section the IRM is explained elaborately as one of the tools that the bank provides. The section ends with other advocacy strategies that can be used to hold the bank accountable.

## IRM governance

The IRM is an independent body. It does not report to AfDB management or the teams that help design and implement projects. The AfDB Board of Directors oversees and holds accountable the IRM through the Committee on Operations and Development Effectiveness (CODE).

The IRM is headed by a Director, selected by a panel composed of the Chair of the CODE Committee, two Senior Management representatives and two external advisors (including at least one civil society representative). The Director serves for a non-renewable six year term, cannot have worked for the AfDB for five years before being appointed, and cannot work again for the AfDB after the term ends.

## IRM functions

The IRM has three main functions:



### **Problem-Solving (Mediation):**

To restore effective dialogue with the complainants, and other relevant parties, with a view to resolving the issues underpinning the complaint.



### **Advisory Services (Internal Learning):**

To promote institutional learning and culture of compliance within the bank and to strengthen the positive social and environmental impact of the bank's operations.



### **Compliance Review (Investigation):**

To examine whether the bank has complied with its policies and procedures.

The first two functions are triggered when the IRM receives a complaint. After the IRM preliminary review, the complainant can choose whether to proceed with problem-solving, compliance review, or both.

## IRM scope

It covers all operations financed by the bank (including financial intermediaries) and considers all the relevant operational policies, guidelines and procedures related to environmental, social and governance aspects of bank operations such as the Disclosure and Access to Information Policy and the Integrated Safeguards System.

## Filing a complaint: what, who, when, and why



Submitting a complaint can help raise concerns about the harm caused by an AfDB-funded project.

**What:** the complaint must relate to past, current or future harm, as a result of the bank's failure to comply with its own policies and requirements during the design / appraisal / implementation of a project.

**Who:** any individual or group who allege they have been harmed or they risk being harmed; duly appointed representatives of the affected communities; an AfDB Executive Director; or the IRM Director.

**When:** complaint can be submitted up to 24 months after the physical completion of the concerned operation or 24 months from the date the complainant becomes aware of the adverse impacts, whichever comes later.

**Why:** submitting a complaint can help raise concerns about the harm caused by an AfDB-funded project and bring the problem to the attention of the President and the Board of Directors, who can instruct management staff to re-design projects to prevent harm, provide compensation and access to remedy, or responsibly withdraw from the project. Through problem solving, communities and AfDB clients can work on constructively addressing grievances. Filing complaints also helps create a track record of the bank's violations, and this can be a useful advocacy tool to push for institution-wide changes to policy or practice and help prevent future policy violations.

## INELIGIBLE COMPLAINTS

The IRM considers the following complaints ineligible:

1. Procurement-related complaints (handled by the AfDB Procurement unit);
2. Allegations of fraud or corruption (handled by the Office of Integrity and Anti-Corruption);
3. Fraudulent, frivolous, or malicious complaints, or motivated by an intention to gain competitive advantage;
4. Anonymous complaints;
5. Complaints regarding matters over which the IRM has already reached a decision, unless justified by clear and compelling new evidence/circumstances;
6. Unsuitability of AfDB policies or procedures related to the complaint.

## Submitting a complaint - Mandatory Information

Complaints can be submitted in any format. When made verbally, the IRM will assist complainants in submitting their complaint in writing. Mandatory information includes:

1. **Contact information** (name, address, phone, email) of the complainant; if they wish their identities to remain confidential, they must explain why.
2. In case the complainant is a representative of the affected people, she/he needs to provide a **signed letter** confirming the authority to represent them.
3. A brief **description of the project** and, if possible, the policies and/or procedures that have been violated, with explanation of the actual or expected harm.
4. An outline of the **expected change** as a result of the complaint process.

5. A description of any **good faith communication** with bank staff regarding the issue(s) raised in the complaint, including supporting materials (eg: correspondence) or an explanation on why such efforts were not undertaken. If the IRM deems these efforts would be futile or harmful, the requirements for good faith efforts can be waived.

## Risk of reprisals and protection of complainants

In many contexts, human rights defenders and community members raising concerns around development projects risk facing reprisals and might be attacked as a result of their opposition to a project.<sup>2</sup> For this reason, the complainants and the interested parties can request to keep their identities confidential. In this case, the IRM will also undertake, in consultation with the complainants, a risk analysis to identify and monitor potential risks of retaliation, and plan and adopt preventative measures to address and reduce these risks. However, if the Director - after consulting with the complainant - deems that the process cannot proceed while maintaining the requested confidentiality, she/he will have to terminate the process.

If reprisals occur, the IRM will seek to clarify the limitations of its direct ability to respond to reprisals and protect the complainants. It will also inform the Senior Management, the Board of Director and the President, in order for the AfDB to take appropriate action.

Any proposed measures should prioritize the safety of persons under threat.

## How to submit the complaint

Complaints can be submitted in any language. When the complaints are not in English or French, the IRM will inform the complainants about the estimated time for the translation. Complaints can be sent to the IRM at the AfDB headquarters office or any of the **country offices**.

### IRM CONTACTS

Independent Recourse Mechanism (IRM) - AfDB

BP 1387 Abidjan 01, Côte d'Ivoire - Immeuble du Centre de Commerce International d'Abidjan (CCIA) - Avenue Jean Paul II, 14th Floor.

Email: [irm@afdb.org](mailto:irm@afdb.org)

Tel: +225 27 20 26 56 96 (IRM Front Office)

## Cooperation with other International Accountability Mechanisms (IAMs)

If the IRM receives a complaint that has also been submitted to an accountability mechanism of another development finance institution, it will cooperate with it while remaining within its own rule and mandate. If deemed necessary, IRM may also notify other IAMs of registered complaints not subject to co-financing but located in overlapping territories of operation. If a complaint is submitted to a co-financing institution only, but it relates to an AfDB Client, the IRM will brief Management and the Boards of Directors – as soon as publicly available information on such cases becomes available.

<sup>2</sup> The terms 'retaliation' or 'reprisal' indicate any type of intimidation or attack against human rights defenders and community members who are targeted for expressing their opinion, raising concerns, criticizing or opposing a development project. Retaliations can include different types of targeted attacks, ranging from defamation to intimidation, criminalization, travel or work bans, gender-based violence, torture, disappearance, and killings.



Community of the Saloum Islands for the greening of AfDB investments.

# Advocacy and other strategies for holding the AfDB accountable

To hold the AfDB accountable, apart from filing complaints, CSOs and project-affected people can adopt different strategies:



Raise concerns and put pressure on the bank through social media.

## Media and social media campaigns

The AfDB is careful to keep a good reputation, and it is therefore sensitive to public scrutiny. It can be effective to publically raise concerns and put pressure on the bank through social media, as an organization, as a joint effort of a network, or via allied media outlets. Getting investigative journalists to publish stories about the AfDB can also be helpful for creating public pressure on the bank to respond.

## Lobby parliamentarians and promoting parliamentary oversight of the AfDB

Another strategy involves going straight to the governments who own the AfDB with the demand to strengthen their oversight. A large sum of donor governments' official development aid is spent by development banks, yet parliamentarians are not always questioning how these funds are spent. A better parliamentary oversight of the AfDB is needed, and this type of attention adds to the pressure on the bank to act.



Public protests have often forced breakthroughs in ongoing debates in society.

## Appeal to UN bodies and regional entities, such as the African Commission on Human and People's rights

Engaging with UN bodies, or filing complaints at UN Special Rapporteurs, can lead the UN to look into a specific case or send a Rapporteur to do an investigation. Having UN representatives to speak out can help put pressure on the AfDB and/or the national government. These types of strategies can also work by engaging with a National Commission on Human Rights or the African Commission.

## Public protests and acts of civil disobedience

Civil society groups and communities all over the world have protested against policies and projects funded by development banks. People have marched kilometers across countries to capitals to get their voices heard, organized protests in front of national offices or headquarters, and prepared acts of civil disobedience. Throughout history, public protests and acts of civil disobedience have often forced breakthroughs in ongoing debates in society.



Civil society groups and communities are stronger together.

## Organize and work within networks

Civil society groups and communities are stronger together. Mobilizing communities, building networks of ally organizations across the continent and the globe contributes to becoming a political force that can make a change.

# Useful links

## General info

AfDB official website  
<https://www.afdb.org/en>

AfDB Civil Society Engagement platform  
<https://cse.afdb.org/en>

AfDB news and events  
<https://www.afdb.org/en/news-and-events>

Independent Recourse Mechanism  
<https://www.afdb.org/en/independent-review-mechanism-irm>

## Policies

Policy on Disclosure and Access to Information (DAI)  
<https://www.afdb.org/en/disclosure-and-access-to-information/dai-policy>

Integrated Safeguard Systems  
<https://www.afdb.org/en/documents/integrated-safeguards-system-april-2023>

Integrity and anti-corruption  
<https://www.afdb.org/en/about-us/organisational-structure/integrity-and-anti-corruption>

## Other Toolkits

Tools for activists: An information Advocacy Guide to the World Bank Group  
<https://bankinformationcenter.org/en-us/update/toolkit-for-activists/>

How to Engage the World Bank Around Child Rights, Bank Information Center (2023)  
<https://bankinformationcenter.org/en-us/update/how-to-engage-the-world-bank-around-child-rights>

Track the latest proposed AfDB projects and receive support from the *Early Warning System*  
<https://ews.rightsindevelopment.org>

Mobilize your community with the *Community Action Guides*  
[https://bit.ly/IAP\\_Action](https://bit.ly/IAP_Action)

## Contacts

Country office contacts  
<https://www.afdb.org/en/about-us/organisational-structure/complexes/country-regional-programs-policy/country-office-contacts>

## Community Resource Exchange

Are you a community affected by an AfDB-funded project? If you are looking to collaborate with allies and access skills, tools and resource, please contact the Community Resource Exchange (CRE) team at: [cre@rightsindevelopment.org](mailto:cre@rightsindevelopment.org)

To learn more, visit: <https://rightsindevelopment.org/our-work/community-resource-exchange/>