

NOV 2024

ENGAGING

PUBLIC DEVELOPMENT BANKS

A toolkit for civil society organisations

Prepared by

Amanda Lucey



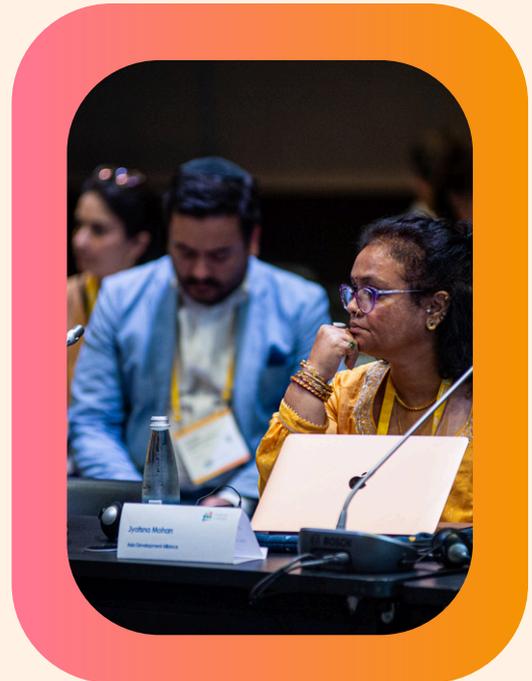
www.forus-international.org



About this toolkit



©Midia Ninja, Land Activists, Brazil



©Forus, Finance in Common 2023

Forus is an innovative global network empowering civil society for effective social change. Forus brings together 69 National NGO Platforms and seven Regional Coalitions from Africa, America, Asia, Europe, and the Pacific. Forus is currently serving as the Civil Society Organisation coordination lead for the Finance in Common Summit (FICS), an initiative that brings together more than 500 Public Development Banks (PDBs) to work together on addressing sustainable development and climate change.

A key pillar of Forus' programmes is 'Financing for Sustainable Development', in which Forus members work together to advocate for a new and more sustainable model of international financing for development. A key objective of our work is strengthening CSOs' expertise on financing for development and their ability to influence PDB policies, procedures and operations.

This Toolkit is designed to assist Forus members and Civil Society Organisation (CSO) partners, including the CSO Informal Mechanism on FICS (the CSO network engaging in FICS, which Forus leads), and all CSOs that have an interest in engaging with PDBs, to better understand and engage with PDBs. With more than 500 PDBs operating around the world, and with trillions of assets, PDBs are powerful organisations which operate with state-funded tax-payer money, and which should be accountable to the public.

Core human rights treaties emphasise the need for States to mobilise and advance funding for the progressive realisation of human rights, which includes PDBs for which the achievement of the Sustainable Development Goals (SDGs) is fundamental. However, PDBs often operate in challenging circumstances, in fragile and developing countries, and face substantial risks in implementing projects, especially considering their size and volume. A human rights-based approach is therefore essential so that PDBs do not inadvertently do any harm, or worse still, cause untold damage without remedy.

Understanding the role of PDBs at local, national, regional and global levels is complex. Forus member and partner experience has shown that in many countries, there is very limited and often no dialogue between CSOs and PDBs. Some examples of challenges include the lack of civic space, limited knowledge about public banks (structure, mandate, policies, and operations and policy) and how to access to information about projects funded by PDBs, especially by communities directly impacted by PDB-funded projects.

This Toolkit intends to assist Forus members and CSO partners to understand entry points and strategies to engage PDBs at local, national and regional levels. The Toolkit is not a panacea, but rather designed to provide information and case studies to demonstrate challenges, opportunities and lessons learnt from CSO representatives and local activists who have been at the forefront of struggles. In this Toolkit you will find stories about the practices to assist you in how to influence the policies, procedures and operations of PDBs. Collaborating with CSOs with different levels of skills and interests and putting forward the voices of local communities with PDBs in decision-making forums, where possible, is essential for influencing the policies and operations of these Banks.

The Toolkit complements an internal research report that was also developed for Forus. Both are based on a literature review of CSO engagement with three PDBs, namely the African Development Bank (AfDB), the Asian Development Bank (ADB) and the Inter-American Bank (IDB). This literature review was complemented by interviews with CSOs, community-affected stakeholders, multilateral bank representatives and government officials. Thus, the case studies mainly focus on these specific PDBs.



More info

For more information email: contact@forus-international.org,
<https://www.forus-international.org>

Table of Content



Acknowledgments

1

List of Acronyms

2

What is a public development
bank?

3

Why is it important for civil
society to engage with PDBs?

5

Entry points for engaging PDBs

8

Moving forward

51

Footnotes and Resources

53

Acknowledgements

We would like to thank all **Civil Society Organisations (CSOs)** and **Public Development Bank (PDB) representatives** who agreed to be interviewed and/or who provided valuable resources and information for this study. We would also like to extend our special recognition to **the Coalition for Human Rights in Development (CHRD)**, our **key partners for the Finance in Common Summit**, whose support has been instrumental in this project and our wider work. The publication was supported by a team of reviewers composed of:

- **Marianne Buenaventura Goldman:** Forus Project Coordinator, Finance for Development, Editor.
- **Bibbi Abruzzini:** Forus Communications and Campaigns Coordinator, Publication Designer and Peer Reviewer.
- **Clarisse Sih:** Publication Designer French and Spanish versions
- **Maria Elisa Novoa:** Forus Capacity-strengthening Coordinator, Peer Reviewer.
- **Arturo Cortés Barbabosa:** Forus MEAL Coordinator, Organisational Effectiveness and Special Projects, proofreader.
- **Paul-Gilbert Colletaz:** Forus Fundraising Coordinator, proofreader.
- Forus would like to thank **Wendy and Alain Dubreuil and Álvaro Martínez Bueno** for translating the publication into French and Spanish and **Andrés Gutiérrez** for additional support.

Finally, we would also like to thank the following organisations and photojournalists for providing images and visuals for the report: Sanjog Manandhar, Both Nomads, CHRD, ADB, AfDB, NNNGO, International Accountability Project, Finance in Common, IFC, Human Rights Watch.



©Forus General Assembly 2024, Botswana

List of Acronyms



ADB	Asian Development Bank
AfDB	African Development Bank
AIB	Asian Infrastructure Bank
AM	Accountability Mechanism of the ADB
CAO	Compliance Advisor Ombudsman
CBO	Community-Based Organisation
CSO	Civil Society Organisation
DFI	Development Financing Institution
EWS	Early Warning System
FICS	Finance in Common Summit
IDB	Inter-American Development Bank
IED	Independent Evaluation Department
IFC	International Finance Corporation
IRM	Independent Recourse Mechanism of the AfDB
IMF	International Monetary Fund
MDB	Multilateral Development Bank
MICI	Independent Consultation and Investigation Mechanism of the IDB
NGO	Non-Governmental Organisation
NGOC	NGO and Civil Society Centre
OHCHR	The Office of the United Nations High Commissioner for Human Rights
PDB	Public Development Bank
RDS	Rural Development Societies
WBG	World Bank Group
UN	United Nations

01

What is a Public Development Bank? ↘



©Forus - Finance in Common Summit 2023



Public Development Banks (PDBs) are 'public financial institutions initiated by governments to pursue public policy objectives'.¹ There are now many different types of PDBs, also known as Development Financing Institutions (DFIs), with more than 500 PDBs operating around the world at sub-national, national, regional and international levels. A PDB owned by two or more governments is also called a multilateral development bank (MDB).

The first PDBs (the Bretton Woods institutions, made up of the World Bank and International Monetary Fund) were established to help rebuild Europe and Japan after World War II. In line with this thinking, PDBs are generally intended to support economic recovery and sustainable development. They can have general (for example, supporting poverty reduction) or specific (for example, strengthening agricultural systems) mandates. PDBs can differ according to the sectors that they support (for example, trade, energy, infrastructure) and the range of financial support that they provide (grants, loans, credit, guarantees, investment insurance, equity, financial intermediaries, blended finance or technical assistance).



©Niger Delta Climate Change Conference rally 2024

It is important to note that while central governments steer a PDB's corporate strategy, PDBs are stand-alone entities with an independent legal status and financial autonomy. This means that, in turn, they are held accountable as independent entities. They do not facilitate commercial lending and should therefore, in theory, be more driven by developmental than profitable objectives.² PDBs operate at the intersection of finance and public policy by mobilising funds to fund projects, providing support to governments and corporations, promoting policy reform, and setting global standards.

What is a model PDB?

Many PDBs 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. They can also invest in new areas to bring about development, such as by investing in climate change, small-scale infrastructure, entrepreneurship, agriculture and so on. A model PDB will target finance where it is needed the most and should take a long-term perspective. PDBs should be accountable for public grants or loans since they are financed by taxpayers' money and should have responsible and transparent policies that insulate them from political and corporate pressure.



Learn more: see the European Network on Debt and Development (EURODAD)'s [model features](#) for a PDB.

02

Why is it important for civil society to engage with PDBs?

What is civil society?

This report refers to Civil Society Organisations (CSOs) as an umbrella term to describe Non-Governmental Organisations (NGOs) and Community-Based Organisations (CBOs). It is important to note that some PDBs refer to NGOs, while others refer to CSOs and CBOs. CSOs have a wide range of interests and ties. The main difference between an NGO and a CBO is the extent to which it is embedded in the community, with NGOs having more international ties. Neither include business or for-profit organisations.

The benefits of CSO engagement with PDBs

While PDBs are intended to support sustainable development, some critics have argued that institutions such as the World Bank (WB) and the International Monetary Fund (IMF) reflect neo-colonial paradigms that support a corporate, private-sector driven approach. Instead of enhancing sustainable development, it has been suggested that PDBs instead worsen debt cycles, use policies that limit government spending on pro-social issues (austerity measures), and cause harm that deepens extreme poverty.³ Similar critiques have been extended to other PDBs, such as the ADB, [here](#).

Civil society can therefore provide a critical lens on how PDBs operate, including analysing which thematic areas PDBs prioritise, how projects are implemented, how they uphold human rights standards and how much they 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 as remunerated contractors, to the more critical (and unremunerated) roles of influencing policy and holding the Bank accountable. Across these roles, civil society can ensure that PDBs adequately consider people's needs and the environment. The table below breaks down the benefits of civil society engagement with PDBs according to these different roles.

Table 1: The benefits of CSO engagement with PDBs, differentiated by role

General	As a critical voice	As a contractor
Maximising impact on key development initiatives by making them people-centred and inclusive.	Holding PDBs accountable on the negative consequences of projects through advocacy and awareness raising.	Improving PDB project results and effectiveness, while ensuring greater inclusion.
Informing policies and programmes based on local and contextualised information.	Supporting communities to file complaints and seek remedy on the negative impacts of projects either to governments (acting as the borrower) or the PDB.	Optimising resource expenditures by being involved in project implementation.
Facilitating ownership by communities on PDB projects through community outreach and social mobilisation to ensure sustainability.	Influencing Bank policies to be more aligned with international human rights standards or community needs.	Delivering services in hard-to-reach areas and informing project delivery methods.
Fostering social innovation.	Influencing the development of pro-poor and inclusive policy.	Reducing the risk of project failure through conflict analysis and community engagement.

Tip

Some PDBs lack awareness of the added value of CSO engagements. It can be helpful to provide the PDB with your own analysis of the different roles that CSOs can play in the context of their institution, and how this can be best incorporated and facilitated in the Bank’s engagements.

The following case study considers how CSOs have played a role in making the ADB more people-centred, inclusive and impactful, while also holding it accountable.

Case study

Holding the ADB accountable for its development approach

Context

In 2024, a group of CSOs issued a collective statement to the Asian Development Bank (ADB), in which they claimed that the Bank had played a historical role in the multiple crises facing the Asian region today. The statement argued that these crises could be partly attributed to the Bank's provision of conditional loans which further impoverished developing countries, the ADB's focus on profit, rather than upholding the rights of the marginalised and vulnerable, and for the fact that it continued to finance fossil fuels. The statement was issued during the ADB⁴ 2024 annual meetings, which CSO representatives also attended. The network bolstered its argument by alluding to a report that they had conducted which evaluated the Bank in terms of effective Development Cooperation principles. These are principles created by the Development Assistance Committee of the Organisation for Economic Cooperation 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.

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. These included 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 which involve greater genuine participation by CSOs across all levels of ADB operations.⁵

Engagement Strategy

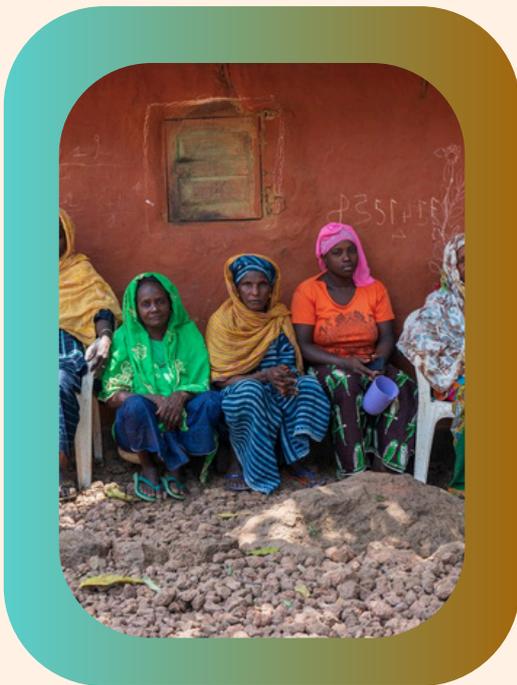
During the annual meetings, CSOs used a blend of inside and outside approaches, from panel discussions to protests. This will have certainly put pressure on the ADB to reform.

Results

It is too early to tell if these recommendations will be taken up.

03

Entry points for engaging PDBs



©Inclusive Development International



©Cambodian environmental defender Yorm Bopha. Jenny Holligan

Identifying the funder

Your intervention with a PDB will vary depending on whether you are from a project-affected community, a civil society organisation supporting a community, or an organisation that works more broadly on policy. If a project is affecting your community and you do not know who is behind a new development, there are several resources at your disposal.

The International Accountability Project has an [Early Warning System](#) (EWS) that collects information about planned and existing projects. They check and summarise this information before sharing it with CSOs and communities. This is ideally done before funding is approved. Communities can then do their own research and decide to act, supported under the banner of the EWS and its partners.



Inclusive Development International have launched a campaign called 'Follow the money to justice'. Communities that are challenging harmful investment projects can request an investigation from the project team [here](#). Priority is given to requests from the sub-Saharan Africa and Southeast Asia regions. There is also an [online resource hub](#), with guides for following the money and data tools.

It is then important to establish what the impact of a project is on the community and the environment. You should then determine what outcome you want. Is it to stop the project or for it to be adapted? Do you want more consultation? There are also organisations, such as the [Accountability Counsel](#), who can help you understand the process of laying a complaint and who can assist you in managing expectations and dealing with the practicalities (see also the section on building coalitions).

Muddy waters: Financial intermediaries

It is increasingly difficult to determine who is funding a project because PDBs use financial intermediaries that may not have the policies and standards as the PDB. This had led to civil society efforts to ensure that PDBs mention standards for financial intermediaries in some of their policies and frameworks. Oxfam, for example, released a report entitled '[Open Books](#)' on how DFIs can be more transparent in the projects they finance through financial intermediaries. In a recent [submission](#) to the ADB, the organisation Recourse suggested that: 'All financial modalities should be covered by and explicitly form part of the ESF, not stand separately and be approved separately. The whole ESF should apply and where exceptions are proposed, they should be explicitly clarified and justified.'

Identifying the PDB's governance structure

- **The PDB decision-makers**

From the outset, it is important to understand the institutional structure of the Bank that your civil society organisation wishes to engage with. This means examining the Bank's mandate, priorities and decision-making bodies.

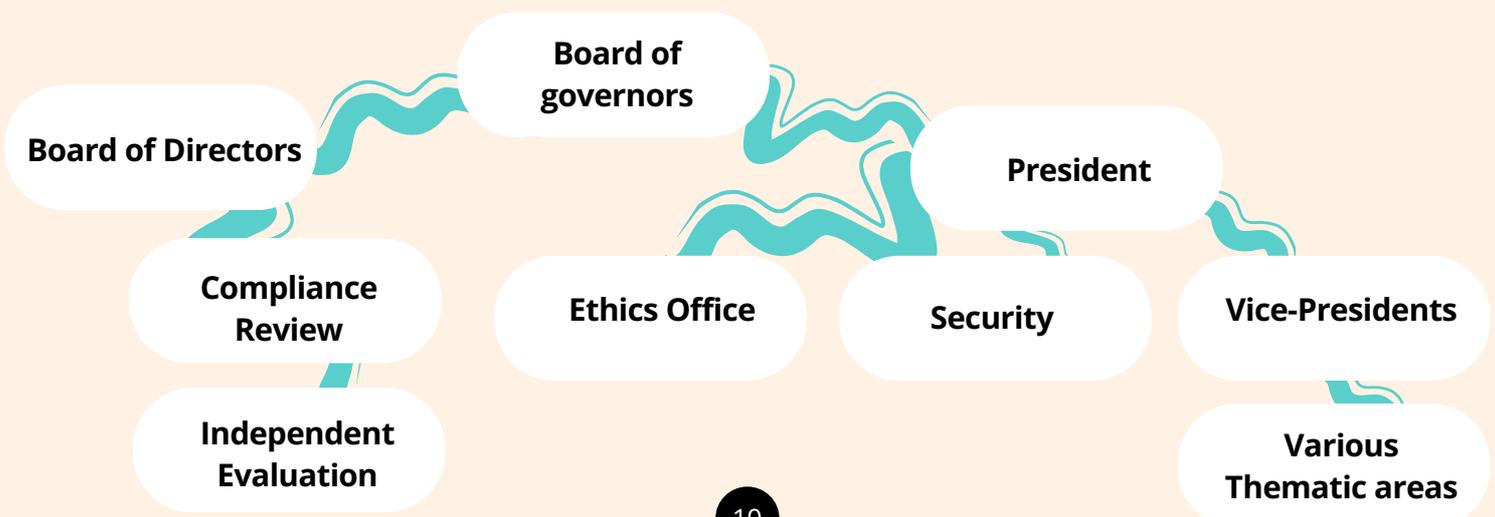
The Board of Governors is the highest decision-making body. There is also a Board of Directors, where key decisions are made, and a President of the Bank who runs its management.

Tip

It can be helpful to understand to engage the Board of Directors since they represent shareholder interests. In particular, CSOs can identify specific countries and stakeholders (including government ministries) on the board that are open to civil society engagement and to either engage them on specific Bank projects, or on Bank policies. Some civil society coalitions have quarterly meetings with certain shareholders that contribute to a large part of the budget of the bank that they engage with. You can find details of shareholders on PDB websites.

Depending on the PDB in question, there may be specialised offices/departments that report to the Board of Directors, including Independent Evaluation Departments, offices connected to the compliance review functions of the PDB's Accountability Mechanism, or offices relating to anti-corruption and integrity. Offices relating more to ethics and conduct, or special projects, as well as vice-presidents, broken down by thematic area, report directly to the President.

An example of what an organogram could look like at a PDB (these vary according to the PDB):





©Forus - Finance in Common Summit 2023

• Engaging PDBs at project, national, regional and global levels

There are several levels that the Bank operates at, which CSOs can engage with. Before starting to engage, CSOs should consider the following questions to determine their level of engagement:

- Is your organisation local, national, regional or international?
- How does your organisation's vision and mission match the mandate and priorities of the PDB?
- What are your intended objectives in engaging a PDB? It is to stop a project? Get a remedy? Influence policy?
- Are you working on a project basis with affected communities, or at a more thematic level?
- If working at the local level, do you face risks in engaging local authorities about a particular project?
- If so, is there a national, regional or international CSO that you could engage to minimise risks, lay complaints or raise awareness?
- If working at a thematic level, are there specific thematic areas in which your organisation could influence PDB policy based on your expertise?
- Are there organisations that work on the same thematic areas but at different levels (local, national)?
- How could you most effectively join forces with other organisations to maximise your impact, without duplicating roles and responsibilities?
- Are there other thematic areas that might overlap with your thematic interests (for example, how safeguards policies are being pursued in the context of climate finance)?
- Which Bank focal points are most appropriate to engage at your level of involvement?

It is important to note that organisations can work at various levels. For example, an organisation could begin by working at the project level with conflict affected communities. You might find that some of the challenges relate to the PDBs institutional strategies. For example, it may not be possible to obtain information on a particular project because the Access to Information Policy does not provide for timely disclosure of information, or because grievance mechanisms lack the capacity to investigate. Organisations could then decide to engage at the regional level through policy reviews.

The PDB website should include some civil society focal points who are Bank staff. For example, the ADB's NGO engagement policy establishes an NGO and Civil Society Centre (NGOC) within the organisation, while the AfDB and the IDB have singular focal point at the Bank. Identify who these staff are, and how they relate to which level you engage with.



Tip

It is useful to engage across all levels for maximum impact. The different levels of engagement are depicted below.



Project

Stakeholders: Project-affected communities, PDB project staff, Independent Accountability Mechanisms, local government, national CSOs, international CSOs.
Type of engagement: Involvement in project design, implementation, monitoring, holding PDBs accountable for the negative impacts of the projects, engaging with project-affected communities, highlighting how projects differ from policy, and awareness raising and advocacy.



Country

Stakeholders: Country office, PDB management, Independent Accountability Mechanisms, national government (the client), Parliament, local CSOs, international CSOs.
Type of engagement: Influencing country partnership strategies, engagement in PDB open days for information sharing, awareness raising and advocacy.



Regional/Global

Stakeholders: Executive Directors, Member States, specific PDB departments (e.g. Safeguards teams, access to information teams), Independent Accountability Mechanisms.
Type of engagement: Participation in annual meetings, policy reviews, awareness raising and advocacy.

• The project/community level

The first of the levels that CSOs can engage PDBs with is the project level. Ideally, CSOs should be proactively involved in project design, emphasising a human rights-based approach, that involves as wide-ranging and meaningful consultations with communities as possible. In reality, this is harder to achieve, and communities tend to engage once harms have already been committed, either through country-level project grievance mechanisms or through Bank accountability mechanisms. Communities and CSOs therefore have an important role to play in monitoring projects – holding PDBs accountable to their own environmental and social policies, as well as international human rights standards. Documentation is often found on Bank websites, including project documents, procurement information and awarded contracts. Information should also be accessible regarding the environmental and social risks of projects. CSOs can also engage with project-affected communities and share findings with relevant government and Bank project team staff. 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.

• The national/country level

At a 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.⁶

As experience with the ADB has shown, engagement at country level is dependent on the extent of civil society in the country as well as the openness of the government towards engaging NGOs. Often in the past, civil society has only been consulted after the priorities have already been established.⁷ It is therefore important for civil society to engage country offices to establish when the next country strategy will be developed and to try and influence the PDB to engage them prior to the development of the strategy. This is an important opportunity for CSOs to engage with PDBs, and civil society can advocate for greater inclusion on country strategies by engaging with the PDB country office, or even by engaging PDB management. Some PDBs, such as the World Bank, have directives that outline civil society engagement in the development of a country strategy (see for example the Central Asia Civil Society Guide on Influencing World Bank Country Strategies [here](#)) and these can be used as good practices to alert other PDBs to.

It is important to understand that PDBs will not necessarily have country offices across every country in their region but will mostly have these offices in the countries in which projects are being undertaken. In addition, certain PDBs (but not all), such as the African Development Bank (AfDB), hold civil society open days for information sharing, which are organised by the country offices. Civil society can also advocate at the national level through stakeholders such as Parliament and Ministries of Finance. Local CSOs can conduct research and engage with national CSO coalitions.

The following case study provides an example of how CSOs have been engaged in country strategies at the AfDB.

Case study

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

Context

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.

Engagement Strategy

It is worth noting that here, the engagement with CSOs was related to their role as direct contractors, and based on invitation from the Bank, rather than in influencing policy design from the outset.

Results

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.⁸



©AfDB, with civil society in Burkina Faso



• The regional level/international level

At a regional level and international level, CSOs can participate in policy reviews and annual meetings. Some banks, like the ADB, have a specific panel for CSO discussions at their annual meetings, while the IDB has recently instituted this initiative. Bank websites should have details of their operational policies and sector strategies, as well as their country and regional strategy papers, and policies on Access to Information, Safeguards mechanisms, Accountability mechanisms and others. At this level, CSOs can engage with different Member State governments and the Executive Directors of the PDB. You can engage with Bank management, but also with specific teams, for example those dedicated to environmental and social safeguards, people from the Independent Accountability Mechanisms.

The case study below illustrates some of the efforts made by CSOs to engage at the annual meetings of the AfDB.

CSO Engagement

See how the different levels of engagement apply specifically to the AfDB in a toolkit developed by the Coalition for Human Rights in Development.

Case study

Widening the space for civil society consultation at AfDB annual meetings

Context

Civil society has repeatedly called for inclusion at the AfDB annual meetings, instead of a separate AfDB-CSO forum event. In 2016, 48 African civil society organisations sent a letter to the president of the AfDB calling for more space for civil society engagement and a reform of the CSO Forum.⁹ 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 2023.¹⁰ In February 2024, ahead of the 2024 annual meetings, civil society wrote a letter to the Bank demanding meaningful participation, including thematic CSO-led sessions, a CSO roundtable discussion with AfDB Executive Directors and a CSO town hall meeting with AfDB Senior Management.¹¹ 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 were threatened and ousted from the event. These representatives had been granted access to attend and held a two-day parallel workshop on the outskirts of the AfDB annual meeting but were barred after security guards scrutinised their T-shirts, accused them of leading an unlawful protest and took their badges.¹²

Engagement Strategy

The AfDB representatives used an inside approach, while also arguably adopting an outside approach.

Results

The group was still able to meet some executive directors and Bank officials at the hotel but was not allowed to participate in any further events. Following the meeting in June 2024, CSOs issued key recommendations to the Bank, including ensuring their representation at annual meetings.¹³ It is too early to tell if these voices will be heard and if CSOs will be allowed at the AfDB annual meeting in 2025.



©AfDB civil society group



©Nigeria Network of NGO project strengthening CSO/PDB dialogue

Developing your strategy for engagement

The next step for engaging a PDB is to develop a strategy. You can develop a strategy specifically for your organisation, or for a coalition. A strategy should start by analysing the main project context (your background information). Some of this will include an analysis of the Bank's institutional policies, as discussed below. You should then identify the main problem that you want to solve, examining the causes and effects of the problem. You should then identify the main objectives of your work. You should consider what you want to achieve, how you want to achieve this and how you will measure these results. You should make them SMART.

SMART means:

Specific

Measurable

Achievable

Realistic

Timely

A large part of your strategy should consider advocacy, communication and outreach. You should also consider who you want to target your messages to, and who the audience will be, for any of activities that you do. You should then consider what activities you are planning, and what resources you will need in terms of time, staff, budget etc. If you are developing a strategy for a coalition, you should consider dividing responsibilities according to different objectives of different organisations and by considering the best level at which different organisations can engage. CSOs usually engage with either an outsider (external advocacy) or insider (internal advocacy approach), as is seen below.

External Advocacy

Internal Advocacy

- **External advocacy (outside approach):** Some organisations believe that advocacy is best done through external pressure. This can include local and international media and social media campaigns, public protests, demonstrations and acts of civil disobedience, lobbying Parliamentarians, or appealing to UN bodies such as the Office of the United Nations High Commissioner for Human Rights (OHCHR), or regional bodies, such as the African Commission on Human and Peoples' Rights.

Name and shame?

Some organisations prefer to name and shame PDBs by identifying projects or practices in which they have contravened human rights (an external approach). Others try to influence Bank staff through private engagements. The tactic you want to use might depend on your organisation, while a blend of approaches is recommended.

- **Internal advocacy (insider approach):** Some organisations prefer to engage the Bank through requesting meetings with country office staff, Bank management and CSO focal points, or specific Bank management teams (such as environmental and social safeguards specialists or staff at Bank accountability mechanisms). CSOs can contribute to Bank policy reviews and provide inputs through research papers/briefs or the convening of policy dialogues. The case study in the section below demonstrates use of the insider approach, specifically in relation to the IDB's Environmental and Social Policy Framework (ESPF), which now includes more than 60 CSO recommendations.

Building coalitions

Coalitions are important for engaging PDBs as they put pressure on the Bank to take them seriously. To strengthen your coalition, it may be necessary to first build capacity. To do this, you will first have to list all the organisations that you currently engage with, and identify any organisations operating in your country, regionally or globally, to join forces with.

Steps for building a coalition:

- Map the organisations that you currently engage with and how they engage with the PDB.
- Assess any good practices in terms of this engagement.
- Identify broader interest in engaging your chosen PDB. Where possible, move beyond information sharing and consultation towards ways to collaborate at higher levels and to deepen partnerships. This can include an analysis of existing projects that are being carried out.
- Identify any constraints that you might face.
- Conduct awareness-raising events for civil society as well as trainings to assist other CSOs to understand why their engagement with a PDB is important, entry points for engagement and to develop strategies for the way forward.

Tip

Consider developing focal points in each country (where possible), a focal point for coordinating CSOs across countries and someone who can monitor and evaluate the success of your combined efforts.



©Nigeria Network of NGO project strengthening CSO/PDB dialogue

Case study

How a formalised CSO coalition on the IDB has reformed Bank policy

Context

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.

Engagement Strategy

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. For example, in 2023, the working group stressed that the consultations in the Access to Information Policy had not been ‘meaningful, robust, accessible, diverse, or inclusive, nor are they organised on the basis of participatory agendas’.¹⁴ They further asserted that the IDB should 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.

Results

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 and putting management-led grievance mechanisms in place for IDB and IDB Invest. The IDB has considered several of the working group’s critiques and recommendations on how to strengthen the design of the Amazon Initiative by including provisions on environmental human rights defenders. Moreover, because of advocacy, the Independent Consultation and Investigation Mechanism of the IDB (MICI)’s report on Guatemala hydropower projects included a recommendation that, should the IDB Invest divest from the project, management should develop a responsible exit plan, and the Development Finance Corporation and the IDB Invest declined to support the Jilamito Hydroelectric Project in Honduras, Marfrig in Brazil, and Trecca in Guatemala.¹⁵



Tip

In building your coalition, there are a number of international and regional coalitions that you could consider engaging with.

- The [Accountability Counsel](#) amplifies the voices of communities around the world to protect their human rights and environment and employs community driven and policy level strategies to access justice.
- The [Coalition for Human Rights in Development](#) has regional coordinators in Africa, Asia and Latin America, who will be able to provide contact information on the working groups for the AfDB, ADB and IDB (the AfDB and IDB do not have specific web platforms). It also has a [Community Resource Exchange](#) (CRE) facility for supporting the sharing of experiences across local, regional and international levels, while offering small grants. The '[Defenders in Development](#)' campaign, under the ambit of the Coalition (but not necessarily encompassing the same members and networks), with a security working group to support human-rights defenders that are at risk. There is also a security working group [directory](#) with a list of organisations that can offer support. The campaign also offers small grants for organisations to carry out work to prevent and address risks human rights defenders face, when raising their voices about projects financed by development banks.
- [FORUS](#) coordinates CSO engagement at the [Finance in Common Summit](#) (FICS), enabling CSOs to advocate for CSO policy priorities and improved practices for people and planet.
- The [International Accountability Project](#) offers an early warning system for development projects, ideally offering information to communities before funding is provided.
- The [Bank Information Centre](#) lists specific campaigns, regions and institutions with whom they are engaged.
- The [Reality of Aid](#) Observatorio provides a list of CSO campaigns and data stories from the Asia-Pacific to provide on-ground narratives and evidence-based analyses of development projects.
- [Frontline Defenders](#) support activists to protect human rights.
- The [NGO-Forum](#) specifically engages the ADB and AIIB.



©ADB



©ADB

Identifying and influencing the PDB's institutional policies

One way of engaging PDBs is through their institutional policies and strategies. Civil society can use these policies to hold the PDB accountable to their own commitments at the project level, or to influence how these policies are revised and developed at a regional level. It should be noted that one of the biggest challenges in holding PDBs accountable is that they often rely on client-generated information for information on key processes, such as environmental and social safeguards, consultations with affected communities, identifying reprisal risks and addressing remedies.¹⁶ The borrowing countries (and the financial intermediaries involved) might not have the same standards as the PDB, and it is therefore important that PDBs uphold international standards and practices, respect human rights law and take the ultimate responsibility for making sure that clients' design and implementation of projects are according to these standards.

PDB strategies

Most PDBs will have an overarching strategy to guide their engagements. This will detail their main priorities and thematic areas of working and normally covers a time span of around 10-20 years. This will often be found on the home page of a PDB website, in the 'about us' tab, or in the PDB's list of documents. This is a useful starting point to understanding the Bank's main aims and ambitions.

As noted earlier, PDBs also have country strategies, such as multi-lateral development banks (MDBs) under review in this Toolkit. Typically, country strategies are developed every five years, whereas institutional strategies take a longer-term horizon of ten years or more. For this reason, and because institutional strategies are often more closed events involving all senior PDB officials and representatives from different countries, country strategies may be easier to engage with than institutional strategies. Some PDBs already involve civil society in the engagement with country strategies, while for other PDBs this is a newer phenomenon.

PDB-civil society engagement policies

Some Banks refer to civil society in their institutional strategies, but others also have dedicated civil society policies. These policies are important as they reflect the Bank's commitment to consider civil society viewpoints, and civil society can use these policies to hold the Bank accountable to itself. Ideally, this policy will mainstream engagement with civil society across all levels of the Bank (at the project-level, country-level, regional level and international level). It will also clearly specify institutionalised mechanisms to strengthen engagement with CSOs. These could include PDB-CSO forums or CSO committees or consultative groups. PDB-CSO policies should also be aligned to other Bank policies, such as Access to Information, Safeguards Mechanisms, Recourse mechanisms, Country Partnership Strategies and others.

Tip

Just as it might be hard to identify whom at the Bank your organisation should engage with, it can also be difficult for the Bank to know who from civil society to engage with, as CSOs are diverse and have different viewpoints. If the Bank's policy does not establish a formalised focal point for civil society, work with the CSOs around you to determine how this can best be institutionalised. For example, there are working groups for the AfDB and the IDB, which coordinate and facilitate civil society efforts to engage these Banks.

Mechanisms for PDB-civil society engagement should meet regularly and should have participatory agendas (reflecting not only the PDB's agenda, but also the inputs of different CSOs). Discussions should be meaningful, robust, accessible, diverse, and inclusive. This includes critical and independent civil society, marginalised groups, and people affected by Bank projects. PDB-CSO forums tend to meet once yearly, but civil society can put pressure on the PDB ahead of time to formulate the agenda and the different stakeholders that will be involved. It is also important that there is follow-up on the issues raised. CSO working groups or committees can meet more regularly to monitor progress. Civil society can push for the development of a PDB-CSO roadmap, which encompasses a strategic document, action plan, a financing mechanism, an M&E tracking system and a communication plan.

Access to information policies

Given that a PDB has a public mandate, it has the duty to share information with a wide range of stakeholders, including civil society. Access to information is enshrined in article 19 of the United Nations Universal Declaration of Human Rights, which includes the right **'to seek, receive and impart information and ideas'**.¹⁷ An Access to Information policy promotes good governance, transparency and accountability. A policy can give bank projects greater visibility, coordinate the disclosure of information, improve how projects are implemented by improving consultation and outline standards that are aligned to international human rights best practice.

However, many PDBs continue to use policies that allow exceptions to disclosure of information. These include confidential and sensitive business information, information related to internal and external negotiations, information generated by a third party (such as a government), proceedings about the Board of Directors and information restricted by national policies and laws.¹⁸ When the IDB began to review its Access to Information Policy in 2019, civil society noted that the 'broadly written' exception to country-specific information allowed countries to object to the publication of virtually any information.¹⁹

In some countries, you can request information through an Access to Information law. For example, South Africa has the Promotion of Access to Information Act (PAIA), while countries like Lesotho do not. This can make access to information challenging, as has been the case with PDB loans to the Lesotho Highlands Water Project, such as from the AfDB. Access to information can also be challenged by the signing of Non-Disclosure Agreements, which are legally enforceable contracts that create a confidential relationship between a person who has sensitive information and a person who will gain access to that information. You can find information on which countries have access to information laws [here](#).

Project documents regularly lack important details, are not updated regularly, and are too technical. Often, they are not made available in local languages, making them inaccessible for marginalised groups. For example, an evaluation of the AfDB's disclosure practices, initiated internally by its Office of the Secretary General and General Secretariat (PSEG), found that, while the number of documents proactively disclosed on the Bank's website has increased significantly over the years, from 700 in 2013 to 3 795 in 2020, the overall quality of information was inadequate. It however, argued that the AfDB policy was in line with other PDB policies.²⁰

In terms of CSO engagement, according to a review done by the AfDB's Independent Development Evaluation Office (IDEV), the AfDB has improved access to information through project portals, a CSO database and a civil society tab on the Bank's website, but there is no sustained and systematic two-way engagement between the Bank and civil society. Moreover, access to information was dependent on capacity, resources and the level of freedom of expression in a given country. In the IDEV review, task managers noted time constraints, competence and the common perception that CSOs are 'troublemakers', meaning that information is not actively disclosed by the Bank.²¹

Case study

Comparing policy to practice in accessing information at the AfDB

Context

In 2019, the International Accountability Project tracked project information disclosed for 179 projects at the AfDB. It found that in practice, the Bank fell short of fulfilling communities right to information in several areas, including the level of disclosure for information on project-specific environmental and social risks and mitigation and disclosure of information on the applicable environmental and social safeguards that have been triggered by the project. They found that lead contact information for the borrower or client was not disclosed for 161 of 179 projects (90 per cent), that there were no translations in Arabic, Kiswahili, Portuguese, or other local languages, that only two out of the 179 projects (1 per cent) disclosed the actual plans for stakeholder engagement and that only five of the 179 projects (3 per cent) disclosed information about the Independent Review Mechanism, the AfDB's independent accountability mechanism, in project documents.²²

Engagement Strategy

The International Accountability Project has used a combination of an outside and inside approach, raising this issue with Bank management while also reporting this in the media.

Results

The case study illustrates the utility of examining specific projects and cases to hold a PDB accountable on its policies. These case studies can be used in future access to information discussions.

Thus, access to information policies should ensure that the Bank, rather than the borrowing country, sets standards for information disclosure, which should be timely and guaranteed, with the option to appeal denied requests for information and guarantees of confidentiality. In one instance, the Bank Information Centre shared a [report](#) from a partner on how the IFC had failed to enforce Performance Standards at the Kipoi copper mine, only to learn that the IFC had already completely divested, without sharing any of this information with the community.²³

Access to Information

What should be included in an Access to Information policy?²⁴

- A formal commitment to disclosing information as a fundamental human right.
- Channels, formats and time frames for responding to requests.
- Standards for disclosing information about projects that are in the public interest.
- A minimal list of country-specific exemptions.
- A guarantee that the ultimate management of information resides with the PDB.
- A guarantee of confidentiality for those requesting information.
- A clause that prohibits reprisals for whistleblowers.
- An independent and capacitated appeals mechanism.
- Details of policy implementation (this can be detailed separately in an operations' manual).
- A monitoring and evaluation (M&E) system regarding the use of information.

Tip

It is worth appealing refusals for information since appeals sometimes go to independent mechanisms that may be more forthcoming with information than country offices.



Safeguards mechanisms

In the past, some large-scale infrastructure projects by PDBs have had adverse environmental and social effects on communities. This has largely been a result of poor implementation, or because certain safeguards have been bypassed. This has led to projects excluding vulnerable populations or only enriching the elite private sector.²⁵ In one positive counter example of the ADB financed Song Bung 4 hydropower plant project in Vietnam, a full-time safeguards specialist was deployed to resolve local tensions. A resettlement and restoration plan was developed in close consultation with communities, which developed the trust of communities in the project.²⁶

Many PDBs have subsequently developed Environmental and Social Protection mechanisms to prevent the adverse effect of projects. These policies offer opportunities to increase transparency and accountability. They also provide opportunities for greater civil society consultation. Civil society can inform project design, raise concerns and protect community rights and hold governments or PDBs accountable. However, often safeguards focus on principles rather than precise requirements for implementing principles and consequences for non-compliance. As a result, the countries implementing the projects are left to assume responsibility for safeguards, and do not conduct rigorous environmental and social assessments.²⁷

Across different PDBs, civil society has now demanded that Banks adopt their own binding safeguards, which apply regardless of the national context. This requires clear wording on risk assessment, borrower systems, and information disclosure that is timebound, mandatory and which contains accountability requirements for those doing the lending. These are some of the requirements that CSOs have called for at the ADB, as demonstrated in the case study below.

Case study

Demanding a complete overhaul of ADB's Environmental and Social Framework

Context

In 2022, the ADB initiated a review process on its Environmental and Social Framework (ESF). Despite extensive consultations that extended over a two-year period, civil society submitted a collective statement at the ADB annual meetings in 2024, demanding a complete dismantling of the draft.²⁸ The group further called on the ADB to provide a matrix to illustrate how their inputs had been addressed in the document. While this may not be possible given the large volume of submissions, some of the major concerns related to flexible wording that allowed actors receiving financing to escape accountability. Civil society therefore called for timebound, mandatory, and compliant standards throughout the document. In addition to comments on the language that was used in the framework, the submission notes that a new term 'Mitigation Hierarchy' is used in the paper, which allows borrowers to bypass Environmental and Social Impact Assessments prior to board approval for high and medium-risk projects. Moreover, new wording was introduced on a 'Common Approach Applicable to Co-Financing of projects between ADB and other MDBs' which essentially means that the commonly agreed approach commits to the lowest, rather than the highest, standards of safeguards. In addition, the CSO submission notes how the policy is gender-blind, despite the importance of considering and adopting language the fundamental risks of women in project-affected areas.

Engagement Strategy

CSOs used a blend of an inside and outside approach, participating in panel discussions (using a blend of outside and inside advocacy approaches) and submitting a collective statement, while others protested outside the halls.

Results

Despite extensive engagement with the ADB, it appears that civil society inputs have not been adequately considered in the latest draft of the ESF, and the policy continues to fall short of international human rights standards or good practice. It is important that CSOs continue to advocate on these issues.

What should be included in safeguards policies?²⁹

- An alignment to international human rights law and due diligence.
- Protocols and guidelines for assessing and detecting retaliation risks.
- Screening for human rights risks.
- A commitment by the Bank to provide guidance to country systems on managing risks.
- A strong monitoring role for the PDB on managing risks in country systems.
- A clear commitment to the 'do no harm' principle.³⁰
- Clauses that require the Borrower to consider the impact of the project on community health and safety, gender, the impact on Indigenous peoples and marginalised groups.
- Compensation and entitlement frameworks, particularly in the case of involuntary resettlement.
- Stakeholder engagement mechanisms (including CSO involvement), either through country strategies, or on a specific project basis.
- Grievance mechanisms (and clauses that require the PDB to inform communities about grievance mechanisms).
- M&E of managing safeguards.
- A zero-tolerance policy for retaliation.
- An exclusion list outlining activities that are inconsistent with PDB commitments.
- Outlines for remedy.



Read more: The United Nations (UN) [Guiding Principles on Business and Human Rights](#) are a widely adopted set of principles that call on governments and companies to identify, prevent, mitigate, and remedy actual and potential human rights abuses. An example of how a CSO Coalition from the IDB Working Group has improved the IDB's Environmental and Social Policy Framework, can be seen [here](#).

Tip

It can be useful to monitor projects in terms of their adherence to safeguards. For example, a [report](#) by the International Federation for Human Rights (FIDH) and Bankwatch demonstrates how projects by PDBs violate human rights, despite environmental and social safeguards that are in place. The study provides evidence of violations through case studies to argue that banks need to do more in terms of transparency and public participation when identifying, preventing and remedying human rights risks and impacts. Another tactic that has been used is to demonstrate to PDBs that challenges resulting from a lack of compliance with safeguards is more operational than political. This allows compliance to be analysed from a less controversial standpoint. The following case study illustrates how CSOs have used specific projects to illustrate the lack of country compliance with AfDB safeguards mechanisms, as well as other policies.

Case study

The AfDB-financed Sendou Coal Plant in Senegal

Context

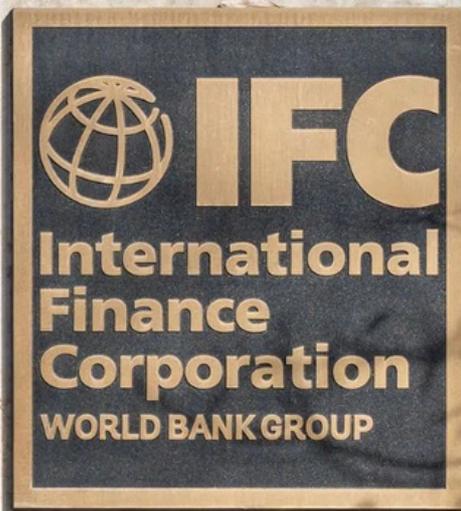
Civil society in Senegal submitted complaints to the Compliance Review and Mediation Unit of the AfDB after a project was approved to develop the Sendou power plant. Civil society raised concerns to address concerns related to environmental and social safeguards issues as well as a lack of transparency, access to information, limited community engagement, and the bankability of the model, given opportunities for renewable energy in the country.

Engagement Strategy

CSOs used an inside and outside approach, using internal policies to hold the client to account while also engaging the media.

Results

The AfDB's Independent Recourse Mechanism (IRM) issued a set of recommendations to bring the plant in line with its policies. Pressure was placed on the promoters of the project to address the complaints and resulted in the development of a community engagement plan and the hiring of a community officer, greater compensation for communities and efforts to reduce environmental pollution. The use of the IRM, when backed by a strategy, was useful in providing access to decision-makers, influencing national and public institutions and investors. Sendou has ceased operations since 2019 and faces reputational risk. The Sendou coal plant is important in demonstrating how recommendations by PDB accountability mechanisms can put pressure on the client to operate in line with PDB policies on safeguards. It is a good example of a case where communities were granted some form of remedy. It illustrates that prevention, through greater due diligence, can save money in the long-term, by avoiding investments in projects that might be subsequently halted.³¹



©IFC



©Human Rights Watch

A focus on gender

Women are often disproportionately affected by the impact of PDB projects. In worst case scenarios, they have become victims of gender-based violence, human trafficking or engaged in sex work. Without a specific focus on gender, women can become poorer and more vulnerable from cutbacks on social spending, such as on education and health. Women can also be proactively engaged in developing policies that include a gender-perspective. Some PDBs have gender policies, or incorporate gender into their various strategies and other policies, such as on safeguards. Gender Action has developed a toolkit that can be used by civil society actors wishing to engage PDBs. This includes sections on gender concepts, tools (checklists, indicators and methodologies for gender analysis), links to sex-disaggregated databases and links to multiple resources. The toolkit can be found [here](#). In addition, an analysis by Gender Action rates more than a dozen International Finance Institutions (IFIs) on their specific PDB gender policies and gender sensitivity across Environmental and Social Frameworks, which can be found [here](#). The study finds that the Asian Development Bank (ADB) and European Bank for Reconstruction and Development (EBRD) have the strongest gender policies, and the World Bank and IMF the weakest. The study makes recommendations of what should be incorporated in PDB policies across different types of gender indicators and can be found [here](#). Despite this, in 2024, CSOs accused the ADB of being gender-blind in its safeguards review, illustrating that even if gender policies exist, they are not always aligned to policies on safeguards.³²

Case study

CSO demands lead to external investigation of sexual abuse cover-up

Context

In October 2023, a coalition of 35 international human rights CSOs submitted a joint letter which called on the World Bank Group (WBG) to: 'Conduct an expeditious, independent and thorough investigation of the allegations that World Bank Group and Bridge management colluded to obstruct and delay Compliance Advisor Ombudsman (CAO's) investigation of the child sexual abuse allegations and seek the resignation of anyone who is found responsible'. This came after media reports revealed allegations of sexual abuse at Bridge International Academies in Kenya, where the IFC had held an equity stake. The compliance appraisal was initiated in January 2021, and an internal report by the IFC's CAO, issued in October 2023, found that the IFC had ignored evidence of sexual abuse and exposed children to unacceptable risks of abuse, but these claims were covered up and not acted upon. The IFC divested in 2022 without any remedy for victims.

Engagement Strategy

CSOs have used a blend of an inside and outside approach, engaging Bank management while also writing articles in the media.

Results

In March 2024, the WBG announced an external investigation of allegations of interference because of this pressure. CSOs continue to call for robust, independent, transparent investigations.³³ The case study illustrates that public pressure is sometimes necessary to generate Bank action, but that management's response can be limited. The IFC continues to reject calls to directly compensate the victims of this abuse.³⁴

Grievance mechanisms and remedial action

Focus on reprisals

You should be aware that the PDB team running the project at the country level, as well as the country office, managing the relationship between the government and the Bank, might not have your best interests at heart. A study by the Coalition for Human Rights in Development 'Misplaced trust' which 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. Exercise caution if you come from a high-risk context to prevent reprisals. If you think it is risky to approach a country office, you could also consider approaching the safeguards team at the Bank, as their job is to manage risks, or to reach out to the Independent Accountability Mechanisms of the Bank. You could also consider reaching out to embassies of countries involved in carrying out the project or to find a suitable interlocutor who can have an informal and 'theoretical' conversation with various Bank staff to test the waters on reprisals. Ideally, PDBs would carry out an independent analysis of retaliation risks, adopt a zero-tolerance approach to reprisals, and develop protocols and guidelines in close consultation with civil society across the entire project cycle. In 2023, the AfDB has developed an anti-retaliation toolkit based on consultations with various CSOs. The toolkit is designed to provide operational guidance to IRM officials in registering and monitoring complaints of reprisals, and in assessing, preventing and responding to reprisals as part of the complaint management process. The toolkit can serve as a guide for other PDBs that wish to develop guidelines on reprisals.

To address accountability issues, PDBs often have grievance, or recourse mechanisms to address complaints when safeguard policies are not met. They are designed to prevent harm, ensure remedy, and improve the policies and practices of an institution. These are particularly useful mechanisms to draw attention to the practices of a government or company. Project-level grievance mechanisms can be challenging because they are managed by clients. This can cause a conflict of interest and because clients can themselves be directly involved in reprisals, as seen in the box above.³⁵ In some cases, Bank-level grievance mechanisms are contingent on the exhaustive use of a project grievance mechanism.

Many PDBs are now recognising that grievance mechanisms should be more accessible to project-affected communities. This has led to the establishment of some grievance mechanisms located at the level of the Bank, known as an Independent Accountability Mechanism (IAM). However, eligibility criteria for those seeking to engage a PDB will vary, as the case study below shows. The independence of these mechanisms across different PDBs also varies. The Accountability Counsel has a database, the [Accountability Console](#), which has data on all the complaints filed to the accountability mechanisms over the past 30 years.



©Accountability Counsel - Accountability Console

Case study

The ADB loan agreement for the Imphal Town Ring Road in India

Context

The Imphal Town Ring Road project in Manipur India has been the site of much controversy since it was first initiated in 2014. The road was aimed at improving road connectivity and trade. International consultants conducted the feasibility study, with support from the ADB. Affected Indigenous communities objected to the survey due to a lack of consultation, a limited impact assessment, and an unfair assessment of their assets. They submitted complaints to the Office of the Compliance Review Panel of ADB on 15 December 2014. The project was delayed for several years, until 2020.

The District government and the Public Works Department then began issuing notices for road demarcation land purchases and eviction orders. Jiten Yumnam from the Centre for Advocacy and Research Manipur argues that this would affect over 1 000 acres of agricultural land, affect more than 500 families and destroy sacred hills and forests. The proposed eviction plan would affect more than 20 households of the Kabui tribe and disconnect households above the road. The government alleged that these villagers were encroaching on the Langol Reserve Forest Areas, while villagers maintain that they settled in the village nearly 500 years ago. Moreover, the plan would involve the destruction of graves and tombs, a temple and water sources. The construction of the road would also increase air pollution. The plan violated several local laws, as well as international human rights law.

Engagement Strategy

Villagers staged protests and filed a petition through the Manipur High Court, which suspended the eviction order (the outside approach). The complaint was filed to the accountability mechanism again in September 2023 and was found to be ineligible on 3 January 2024. The criteria states that there must be prior 'good faith' engagement with local authorities, who had previously failed to respond. However, the Centre for Research and Advocacy in Manipur went to the ADB Annual meeting in 2024, while also engaging the ADB country team and the media (inside approach).

Results

The Public Works Department has since agreed to ten public hearings, which is unprecedented. The case study illustrates one of the challenges in engaging PDB IAMs if the onus to resolve grievances is placed on the client, who is unresponsive. It nevertheless shows the power of using an 'outside' approach to advocacy to put pressure on the client, while using an 'inside' approach to influence the PDB. For further information, see [here](#).



The strength of an IAM mechanism will depend on how strongly the board supports it and how strong its mandate is. It also depends on how strongly management considers and implements the findings. It is rare for policies to give guidance on management's role in a complaints process.³⁶

IAMs

IAMs have three main functions:

01

Compliance Review - A compliance review will consist of an impartial fact-finding mission that investigates claims of harm in terms of compliance with Bank policy and standards.

02

Dispute Resolution - Dispute resolution involves mediation between the complainant and the client.

03

Advisory - The advisory function produces thematic and systematic lessons for the Bank to improve in terms of social and environmental performance.

The case study below shows how CSOs have been successful in getting PDB management to improve guidelines for their IAMs.

Case study

CSO's inform MICI guidelines

Context

The Accountability Counsel was very active in engaging on MICI between 2009-2014, making several submissions.³⁷ In 2018, the Accountability Counsel and partners submitted comments on the draft Consultation Phase Guidelines developed by MICI to standardise its approach to the consultation phase according to its policy requirements, and ensure ethical, transparent, and effective case management.³⁸

Engagement Strategy

An inside approach was used to engage the Bank, while the information has also been published on the Accountability Counsel's website.

Results

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. As a result of continued advocacy, MICI adopted recommendations for its operational management which take a stronger human rights-based approach.

There are some limitations to these mechanisms. A compliance review can be helpful for giving communities more information about a project. Following a compliance review, management is meant to develop an action plan, but it is not forced to implement the recommendations. Similarly, the client cannot be forced to participate in dispute resolution. These are unfortunately some of the biggest limitations of IAMs. Note that while IAMs also offer confidentiality to those laying complaints, in practice it may still be possible to identify those that have laid the complaint.

 **Read more:** Several NGOs have developed a [Good Policy Paper](#), which assesses current policy provisions at independent accountability mechanisms, identifying best practices and areas for improvement (2024). For an example of a civil society submission to the IDB on how to improve the functioning of its grievance mechanism, MICI, click [here](#).

Did you know?

It can be difficult to sue PDBs in court for their projects because of their multinational jurisdiction, which leaves them immune in national courts. In 2022, the United States Supreme Court turned down an appeal from an Indian fishing community who aimed to hold the World Bank liable for a project in India. The villagers claimed that the coal-fired power plant was polluting their water, killing fish and causing respiratory problems. Although the Supreme Court rejected the appeal, it did make a ruling in 2019 that international corporations were not protected from litigation. The final ruling found that the IFC was protected under the Foreign Sovereign Immunities Act. However, the case had brought these practices to light, and the IFC has conducted some reforms, including on environmental and social safeguards. For more information see <https://www.eenews.net/articles/supreme-court-rejects-world-bank-coal-case/>

To lay a grievance case for a Bank-level accountability mechanism, civil society should include their contact information, a signed letter, a brief description of the project, an outline of the expected change as a result of the complaint process and a description of how the complainant has engaged with the Bank in good faith. There may be other requirements dependent on the grievance procedures of the PDB and civil society should check these requirements on their websites.

Tip

It can be helpful to identify international CSOs that support organisations to submit complaints to grievance mechanisms of PDB and to assist you in meeting the eligibility criteria. It is also useful to align yourself to other groups and to submit a joint complaint. Organisations like the [Accountability Counsel](#) can assist you in laying complaints.

Despite the challenge of holding PDBs accountable, some companies can be sued in national courts for their engagement in specific PDB projects. This strategy is not always successful, as is seen below.



©International Accountability Project (IAP) - The IRM team meeting holding a discussion with the leaders and members of Paten Clan, for the Wadelai Irrigation Scheme.

Case study

Complaint to the AfDB's IRM on the Wadelai Irrigation Scheme

Context

In the Pakwach District in Uganda, the Wadelai Irrigation Scheme was approved by the African Development Bank. The scheme was intended to improve household incomes, food security and climate resilience. The Paten community raised objections with the relevant government ministry, as well as the project implementers, the Pakwach District Local Government and Coil Company. One of the primary issues of contention was that a community leader had illegitimately claimed to have the power of attorney to offer the AfDB community land, while another issue was that the community had agreed to give 365 acres of land to the project, but the project team had mapped out 365 hectares of land (this amounts to 902 acres, which is nearly 2.5 times what was agreed). Initially, the Paten clan has engaged the Buliisa Initiative for Rural Development Organization (BIRUDO), a non-governmental organisation. Consultative meetings were held with local government, but they failed to agree on an acceptable solution and the government revoked the Memorandum of Understanding that was signed with BIRUDO. Clan leaders were arrested, and civil servants from the community were prevented from returning to their jobs. When the community resisted the forceful entry of the project's construction company into the area, 16 people were shot.

Engagement Strategy

The Paten community was supported by international and national CSOs, the International Accountability Project (IAP) and the Uganda Consortium on Corporate Accountability (UCCA). The UCCA issued a press statement and both organisations approached the US Department of the Treasury and engaged with the Coalition for Human Rights to develop an open letter to send to the AfDB and the Nordic Development Fund. A meeting was convened with the Country Office (CO), but the CO response denied that any community reprisals had taken place and submitted a complaint to the Bank's Independent Recourse Mechanism.

Results

In October 2021, the IRM received a complaint on the scheme. It determined that the case was eligible and decided to do a compliance review. However, this did not address issues of resettlement or compensation and so the community also filed a court case against the local government. Mediation by the IRM was not possible because of the court case. The Bank management decided to suspend the project, which promoted the Ministry of Water and Environment to hold meditation talks.



©International Accountability Project (IAP) - A walk through the project area by the team from the Independent Recourse Mechanism and community members.

Unfortunately, those involved in the mediation were not members of the Council of Elders, and neither were they those that had submitted the complaint to the IRM. Those involved in the mediation were asked to withdraw the court case. This created a crisis of legitimacy between the two processes. The compliance review, issued in July 2023, found that the Bank had failed to get the consent of communities to use their land, failed to properly monitor the project, and didn't take adequate actions in accordance with its safeguards (particularly with regards to reprisals). It also found that the government's mediation efforts were not credible. AfDB management is now developing a management action plan which will aim to address the recommendations outlined in the IRM's report, ensuring accountability and remedial action. To date, the court case has not been finalised.³⁹

It is also unclear if the client will take up the recommendations of the management plan. Civil society continues to raise these issues from within, as well as in the media. Thus, the case study suggests that the effectiveness of the IAM is dependent on the response from management and may be limited by their ability to compel action or to provide remedy.⁴⁰ Nevertheless, it illustrates that IAMs can be a useful tool in making the voices of communities heard and in raising the awareness of the PDB that clients are violating certain policies, such as environmental and social safeguards. The case study demonstrates how both an inside and outside approach can be used to raise concerns.

The case study below demonstrates another challenge for IAMs – the ability of Bank management to place the blame of remedial action on the client. Should the client operate in an authoritarian context, and should the state be part of the problem, it may be that the victims of project-affected communities never receive adequate compensation or remedy.

Case study

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

Context

The 'Lakes Edward and Albert Integrated Fisheries and Water Resources Management Project (LEAF)' was approved in 2015 and closed in 2021. The aim of the project had been 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.

Engagement Strategy

In October 2021, a Ugandan CSO, the Twerwaneho Listeners Club, submitted a complaint to the IRM on behalf of the community after numerous attempts to engage the AfDB management, which was found eligible.

Results

The IRM then 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 had 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. The grievances had been flagged by the Ugandan Parliament, but the report found that the UPDF is 'considered to be above the law'. 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 conduct an investigation, such as the National Ugandan Human Rights Commission (UHRC). The AfDB Management response insisted that the 'sole responsibility for compensation of the project affected persons lies with the Borrower but will ensure that, if required, resources in existing Bank-financed agricultural projects are provided to cover compensation expenses'. The matter has subsequently been referred to the UHRC, but this raises questions of bias and inaction. It is also unclear if these communities will ever receive compensation for the injustice and loss of income. However, civil society could continue to raise questions with other donors who also funded the project.⁴¹ The case study therefore illustrates how PDBs can place the blame of remedial action on the client, potentially leaving victims without remedy or independent investigation. This is more challenging in authoritarian contexts.

In Bank-funded projects, communities are often left without adequate compensation and worse off than before. There have also been instances where projects end (either because of a routine exit or because an assessment of environmental and social impacts lead the project to close early) without sufficient consideration of how project-affected communities have been impacted. The World Bank is now taking criticisms into consideration and trying to find a standardised approach to remedy. A robust framework is important in supporting risk-taking and ensuring that mistakes are addressed and not repeated. As noted above, the UN Guiding Principles on Business and Human Rights states that those contributing to harms should be contributing to remedy. In 2023, the World Bank Group, specifically the International Finance Corporation (IFC) and the Multilateral Investment Guarantee Agency (MIGA) held consultations on the right to remedial action.

'If IFC and MIGA cannot guarantee remedy for project-related harm, they should not be funding development projects in the first place.'⁴²

During the consultations, CSOs made a series of recommendations, that can be used as guides for advocating for remedial approaches with Banks.⁴³ These are extracted below.



Remedial Policies

What should be included in remedial policies?

- Frameworks should be aligned to international human rights.
- There should be an explicit accountability framework.
- Details on specific types of remedy, which can include compensation, apologies, rehabilitation, commemoration, and others.
- Systematic processes for financing when the Bank's actions contribute to harm, or when the client cannot provide financial contributions.
- Access to remedy after a project is complete.
- Obligations to address remedial actions for projects that have taken place in the past.
- Obligations for clients to address remedial action.
- Guidance for clients to structure grievance mechanisms at a project-level.

 **Read more:** The UN Human Rights Office has also released a [report](#) on how PDBs can improve their responses to remedy.

The case studies at the AfDB show the limitations with engaging PDBs through their IAMs, which are often dependent on country responses. However, CSOs have had some success in ensuring remedy for victims at the IDB's IAM, MICI, as the following two case studies illustrate.

Case study

Hydroelectric dams in Guatemala and their impact on the Yichk'isis community

Context

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 hydroelectric 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.

Engagement Strategy

The communities laid a complaint at the IDB's MICI in August 2018, supported by the InterAmerican Association for Environmental Defense (AIDA), the International Platform against Impunity and the Plurinational Ancestral Government of the Akateko, Chuj, Q'anjob'al and Popti' Native Nations. After three years, 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.

Results

The report, published in September 2021, made 29 recommendations towards the project, including recommendations for the future. For full details of the timelines involved, see [here](#). The IDB set a historical precedent in deciding to withdraw from the project, while also designing a responsible exit plan.⁴⁴



©Women's March in solidarity with the resistance camp against hydroelectric plants. Santa Cruz Barillas, Huehuetenango, Guatemala. Movement against the installation of hydroelectric projects in indigenous territories. Photo: Luis Miranda Brugos.

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. Since then, Bank efforts to engage communities have been delayed by elections and potential conflict. The construction has been abandoned, and creates risk to communities, particularly in rainy season. Civil society continues to advocate for the recommendations to be implemented. 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.

Case study

Restoring livelihoods in Haiti

Context

In Haiti, the Kolektif Peyizan Viktim Tè Chabè, made up of nearly 4 000 Haitian farmers and families signed a landmark agreement with the IDB and the government. The families had been evicted from their 250 hectares of extremely fertile land to make way for the Caracol Industrial Park, leaving them with extreme financial and food security.

Engagement Strategy

The Kolektif filed a complaint to MICI, with the support of ActionAid Haiti, Accountability Counsel and other partner organisations, which led to dialogue between representatives of the Kolektif, the IDB, and the Haitian government.

Results

An agreement was signed seven years after the eviction in 2011. The complaint was registered in January 2017 and the Assessment Report for the Consultation Phase, which determines that the parties agree to seek a resolution using consultation methods, was issued in June 2017. The Consultation Phase Report was issued in 2019. The agreement gives the Kolektif options of land (limited to the 100 families most in need); modern agricultural equipment and training; support for micro-enterprise focused on women and the most vulnerable members of the community; or vocational training scholarships. They were also given school kits and options of employment. More details on the status of the implementation of the agreements can be found [here](#). The case study demonstrates that filing complaints to MICI can result in remedial action on the part of the client. Whether these agreements are fully implemented or not remains to be seen, and will test the power of the agreement and the commitment of the parties. Partners continue to support the Kolektif to ensure these agreements are met.

Engaging PDBs as a direct contractor

As mentioned at the beginning of this Toolkit, CSOs can play a variety of different roles when engaging PDBs. There are pros and cons to both to working as a contractor for a PDB, as shown in the table below:

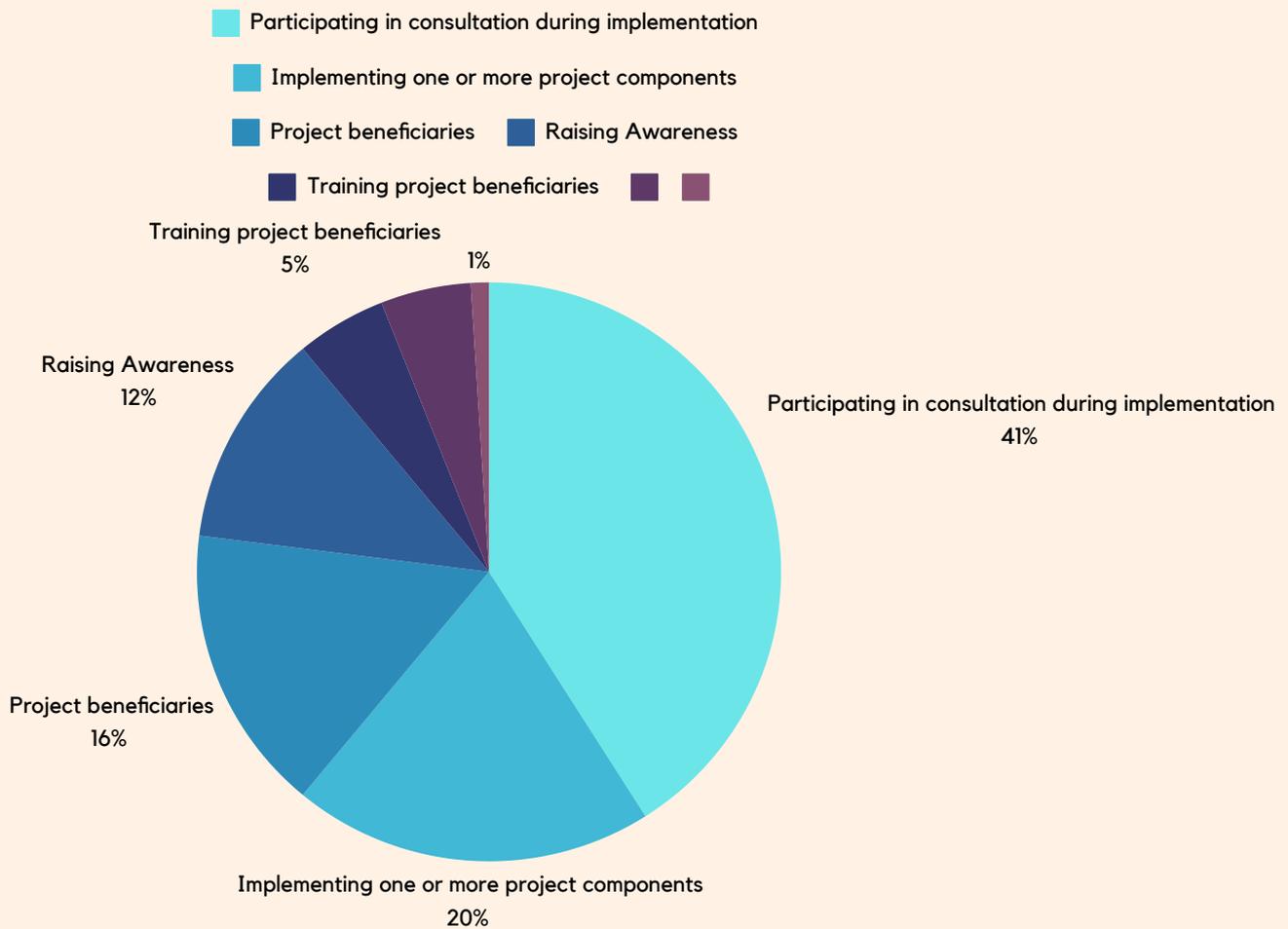
Table 2: Pros and cons of working as a contractor for a PDB

Pros	Cons
Greater direct influence over projects to make development initiatives more inclusive.	Less ability to criticise projects or file complaints.
Potential to promote greater community engagement over projects, leading to increased sense of ownership.	Compromise of independence, potential for bias.
Receiving much needed funding for development work.	Being seen as a 'sell-out' by the community.
Being able to influence policy from within.	Less ability to promote own policy objectives outside of the project.

Some PDBs, such as the ADB, have more developed policies for treating CSOs as contractors. Here, CSOs are treated the same as firms, rather than there being a specific fund for NGOs. 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. Nevertheless, there are other CSOs, such as the NGO FORUM, who do not receive funding from the ADB, and who prefer to operate as critical voices.

While the ADB does not primarily consider the role of critical voices in influencing its engagements, it considers different roles for CSOs across its work. As the following graph of CSO engagement in ADB projects shows, CSOs can also be direct beneficiaries of projects, they can raise awareness of PDB projects, engage in advocacy, train project beneficiaries or develop CSO capacity.

Graph 1: Planned roles and involvement of CSOs in 214 Sovereign Projects of ADB's South Asia Department, 2015-2021⁴⁵



However, in some cases, CSOs have argued that they should be involved much earlier in project planning and design.⁴⁶ Engaging CSOs can also be critical for improving project design, for example, ensuring greater environmental protection or gender inclusion. For example, in Sri Lanka, CSOs were engaged in discussions regarding the Mannar Island Wind Power Generation Project. CSOs were concerned the bird collision risk assessment (potential bird collisions into wind turbines) was not done at the right time of year. Following from the consultations, the number of turbines was reduced, and a state-of-the-art bird radar system was installed to track bird movements.⁴⁷

As mentioned at the beginning of this Toolkit, using CSOs as contractors can benefit a PDB by making programming more inclusive, optimising project results and expenditure, and delivering services in hard-to-reach areas. CSOs can play a role in coordination and capacity development. They can offer innovative strategies for implementation, working with communities to change behaviours and practices and deliver social services. CSOs can also play a critical role in supporting analysis on safeguards and particular issues such as gender or inclusion.

Case study

Reflecting local priorities in the North-East Community Development Project in Sri Lanka

Context

In an ADB project in Sri Lanka, 40 NGOs were contacted to assist with mobilising citizens and identifying their needs.⁴⁸

Engagement Strategy

CSOs were used as contractors.

Results

The NGOs reinvigorated rural development societies (RDS) and created Women's RDS in situations where the RDSs were all men. Communities identified 596 small-scale infrastructure projects to build or rehabilitate, which were managed and maintained by the beneficiary communities. The use of NGOs was instrumental in reaching the large number of villages identified, while also providing training and guidance to local communities to build their own capacity. The case study shows the benefits of engaging CSOs as contractors.

Civil society and communities can also be used as direct project beneficiaries. In Bangladesh under an ADB project, Community-Based Organisations (CBOs) were used as project beneficiaries in a water project. Project staff supported Water Management Groups (WMGs) to develop water management plans, which included the WMGs taking responsibility to their operation and maintenance. This ensured a high degree of ownership, while also avoiding conflict, since WMGs were from the community.⁴⁹ Increasingly, other PDBs beyond the ADB are also using CSOs as contractors and beneficiaries. 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.⁵⁰

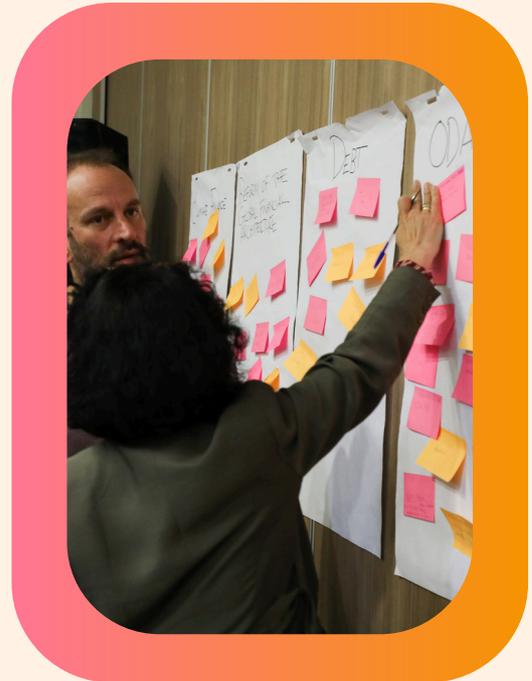
One final area in which CSOs can engage with PDBs is through the monitoring of project activities, although it is worth noting that the latest ADB report on engagement with CSOs states that CSOs are rarely used in monitoring project activities unless directly contracted. However, there are many instances of CSOs being involved in the implementation of Gender Action Plans (GAP).

The importance of documenting good practices on PDB-CSO

Often, PDBs officials are unaware of the full potential value that an NGO can provide. Documenting good practices, either from your own experience, or by demonstrating good practices from elsewhere, can be an important aspect your engagement with a PDB. In 2006, an ADB examination of civil society involvement recommended documenting good practices and putting aside resources for civil society engagement in the design of projects. Subsequent publications from the ADB desk have examined civil society engagement across areas such as project planning, implementation and assessment. The ADB's NGO and Civil Society Center (NGOC) now reviews the reports of all completed projects each year to determine whether the meaningful engagement planned at the project design stage has materialised into CSO participation during implementation. See the 2022 report here. The AfDB also issues a newsletter on civil society, highlighting the important roles that civil society can play. If the Bank that you wish to engage with does not do this, you can consider documenting your own case studies of positive engagement.

04

Moving forward



©Forus General Assembly - Financing for Sustainable Development Working Group

The purpose of this Toolkit is to provide CSOs and project-affected communities with entry points to engaging PDBs. The content of this Toolkit is only a drop in the ocean of the wealth of knowledge that is out there. CSOs are encouraged to read the resources provided in this document and to research each of the individual areas contained in the Toolkit. However, as this Toolkit has emphasised, coalitions create a critical force to hold PDBs accountable. As it has explained, many PDBs shift the responsibility of the blame to the client and borrower countries or hide behind financial intermediaries. It is critical that civil society works together to uphold international principles of human rights and uses good practice to illustrate to Banks how they can improve. Gathering evidence of the negative impact of projects can be a powerful way of forcing Banks to acknowledge that prevention is better than cure and that due diligence is not only critical from an ethical perspective, but also more cost-effective in the long-term. Development is important, but only if it is done in an inclusive and sustainable manner. These corporations cannot be more powerful than government regimes and need to be held to account.

Forus calls on CSOs from local to global level to work together to influence PDBs at national, regional and global level through continuing to share knowledge, experience and lessons-learned on PDB advocacy and policy engagement.

At global level, CSOs can collaborate strategically in engaging PDBs at the Finance in Common Summit (FICS), an initiative that brings together more than 500 PDBs which work together to address sustainable development and climate change issues. CSOs can use the FICS to promote common minimum standards across Bank policies on Access to Information, Safeguards and Accountability Mechanisms, as well as on the Right to Remedy, demanding that this falls in line with international best practice and human rights law. During the last Finance in Common Summit held in Cartagena, Colombia in 2023, over 100 CSOs from around the globe made recommendations to establish formal CSO mechanisms with all PDBs to strengthen civic space, human rights, and prevent reprisals. CSO recommendations can be found in the [2023 Civil Society Declaration at the FICS](#). In line with this thinking, there is a need for all PDBs such as the AfDB, ADB, IDB to reform their models from a top-down approach to a model where community-led and human rights-based operations are the norm, not the exception.



©NNGO Project to support dialogue between CSOs and PDBs.

Engaging with Public Development Banks

Discover the [Engaging with Public Development Banks study](#), with case studies of the African Development Bank, Asian Development Bank and Inter-American Development Bank





Footnotes

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 16 September 2024).
2. As above.
3. E Zuckerman 'A people's history of the World Bank' <https://peopleshistoryimfwb.iboninternational.org/2024/04/15/the-bretton-woods-institutions-colonial-paradigm/> (accessed 16 September 2024).
4. Reality of Aid 'CSO Collective Statement for the 56th ADB Annual Meeting' (2023) <https://realityofaid.org/cso-collective-statement-56th-agm/> (accessed 16 September 2024).
5. Reality of Aid 'CSO Partnership for Development Effectiveness, IBON International. ADB: Mi(shaping) development cooperation and effectiveness in Asia Pacific: A CSO Review of ADB's development effectiveness' <https://realityofaid.org/asian-development-bank-misshaping-development-cooperation-and-effectiveness-in-asia-pacific-a-cso-review-of-adbs-development-effectiveness/> (accessed 16 September 2024).
6. ADB 'Where we work' <https://www.adb.org/where-we-work/documents/country-strategies-programs-under-preparation> (accessed 16 September 2024).
7. ADB 'How does ADB engage civil society organisations in its operations? Findings of an Exploratory Inquiry in South Africa' (2015) <https://www.adb.org/publications/how-does-adb-engage-civil-society-organizations-its-operations> (accessed 16 September 2024).
8. 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 16 September 2024).
9. Coalition for Human Rights and Development 'African CSOs urge AfDB to strengthen civil society involvement' (2016) <https://rightsindevelopment.org/news/african-csos-urge-afdb-to-strengthen-civil-society-engagement/> (accessed 16 September 2024).
10. Coalition for Human Rights and Development 'Joint Statement: AfDB should open space for civil society and communities' (2023) <https://rightsindevelopment.org/news/joint-statement-afdb-should-open-spaces-for-civil-society-and-communities/> (accessed 16 September 2024).
11. Coalition for Human Rights and Development 'The importance of creating space for meaningful civil society engagement at the 2024 AfDB annual meetings' (2024) <https://rightsindevelopment.org/news/the-importance-of-creating-space-for-meaningful-civil-society-engagement-at-the-2024-afdb-annual-meetings/> (accessed 16 September 2024).

12. Coalition for Human Rights and Development 'Civil society groups expelled from AfDB annual meetings' (2024) <https://rightsindevelopment.org/news/afdbam2024-civil-society-expelled/> (accessed 16 September 2024); Coalition for Human Rights and Development 'You're not allowed here: My first experience at the African Development Bank's Annual meeting' (2024) <https://rightsindevelopment.org/news/blog-afdb-annual-meeting-2024/>
13. Coalition for Human Rights in Development 'Civil Society's key demands to the African Development Bank' (2024) <https://rightsindevelopment.org/news/civil-societys-key-demands-to-the-african-development-bank/> (accessed 16 September 2024).
14. International Rivers 'Civil Society Organizations continue to call for more effective consultation processes from the Inter-American Development Bank' (2023) <https://www.internationalrivers.org/news/civil-society-organizations-continue-to-call-for-more-effective-consultation-processes-from-the-inter-american-development-bank%EF%BF%BC/> (accessed 16 September 2024).
15. 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 16 September 2024).
16. Coalition for Human Rights in Development 'Misplaced trust: Why development banks should not rely on their clients to address reprisal risks' (2023) <https://rightsindevelopment.org/misplaced-trust/> (accessed 16 September 2024).
17. UN General Assembly, Universal Declaration of Human Rights, 217 A (III), 10 December 1948 <https://www.un.org/en/about-us/universal-declaration-of-human-rights> (accessed 16 September 2024).
18. Coalition for Human Rights in Development 'Demystifying development finance: How public development banks impact people and the planet' (2023) <https://rightsindevelopment.org/pdbs/> (accessed 16 September 2024).
19. 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 16 September 2024).
20. 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 16 September 2024).
21. Independent Development Evaluation African Development Bank 'Evaluation of the AfDB's engagement with civil society: An IDEV Corporate Evaluation Summary Report' (2021) https://www.afdb.org/sites/default/files/documents/evaluation-reports/engagement_with_civil_society_en_web.pdf (accessed 16 September 2024).
22. International Accountability Project 'In practice: Information disclosure at the African Development Bank International Accountability Project: Updated May 2021' (2021) <https://accountabilityproject.org/wp-content/uploads/2021/08/FINAL-In-Practice-Information-Disclosure-at-the-African-Development-Bank-last-updated-5-Feb.pdf> (accessed 16 September 2024); Bank Information Centre 'Tools for activists: An Information and Advocacy Guide to the World Bank Group' (2020) <https://bankinformationcenter.org/en-us/update/toolkit-for-activists/> (accessed 16 September 2024).
23. Bank Information Centre 'Access to information: Is the IFC leaving communities in the dark?' (2021) <https://bankinformationcenter.org/en-us/update/access-to-information-is-the-ifc-leaving-communities> (accessed 16 September 2024).
24. The following points are drawn from past critiques by civil society on Access to Information policies at the African Development Bank, Asian Development Bank and the Inter-American Bank.
25. Coalition for Human Rights in Development (n 18). /
26. Publish what you fund 'Do DFIs engage with local communities – An interview with Rayyan Hassan' (2021) <https://www.publishwhatyoufund.org/2021/02/do-dfis-engage-with-local-communities-an-interview-with-rayyan-hassan/> (accessed 16 September 2024).
27. Coalition for Human Rights in Development (n 16).
28. NGO Forum on ADB 'Collective Civil Society Statement on ESF Draft (to the ADB): Calling for an overhaul and immediate redrafting' (13 May 2024) <https://www.forum-adb.org/post/forumesfsubmission> (accessed 16 September 2024).

29. The following points are drawn from past critiques by civil society on Access to Information policies at the African Development Bank, Asian Development Bank and the Inter-American Bank, as well as from the report by the Coalition for Human Rights in Development 'Wearing blinders: How banks are ignoring reprisal risks' (2023) <https://rightsindevelopment.org/wearing-blinders/> (accessed 16 September 2024).
30. In engagements with the IDB, civil society has called this the 'do good' principle. The 'do no harm' principle recognises that any intervention in itself becomes part of the context and that some interventions can make things worse. There are always options to prevent negative impacts.
31. The Voices of Communities Affected by Business 'Successes and weaknesses in the Sendou Coal Plant' Alysagne 12 August 2020 <https://alysagne.wordpress.com/2020/08/12/successes-and-weaknesses-in-the-case-of-the-sendou-coal-power-plant/> (accessed 16 September 2024).
32. NGO Forum on ADB (n 28).
33. Accountability Counsel 'External investigation into alleged IFC cover-up must be robust and transparent' (2024) <https://www.accountabilitycounsel.org/2024/04/external-investigation-into-alleged-ifc-cover-up-must-be-robust-and-transparent/> (accessed 16 September 2024).
34. N Wadekar 'World Bank financing arm rejects calls to directly compensate victims of harm at Kenya schools' The Intercept 12 June 2024 <https://theintercept.com/2024/06/12/kenya-bridge-schools-abuse-harm-world-bank/> (accessed 16 September 2024).
35. The Mombasa-Mariakani Road Project (Kenya) case study in Uncalculated Risks cited in Coalition for Human Rights in Development (n 16). /
36. Accountability Counsel et al 'Good Policy Paper: Guiding Practice from the Policies of the Independent Accountability Mechanisms' (2021) <https://accountabilitycounsel.org/wp-content/uploads/2021/12/good-policy-paper-final.pdf> (accessed 16 September 2024).
37. These submissions can be found at Accountability Counsel 'Inter-American Development Bank (IDB) | Independent Consultation and Investigation Mechanism (MICI)' <https://accountabilitycounsel.org/institution/inter-american-development-bank/#documents> (accessed 16 September 2024).
38. 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 16 September 2024).
39. See J Mwebe 'After attacks, a community in Uganda unites to fight for their land' Medium 21 April 2022 <https://accountability.medium.com/after-attacks-a-community-in-uganda-unites-to-fight-for-their-land-78fc27944315> (accessed 16 September 2024); J Mwebe 'Heard at last: Project suspended for a community in Uganda to negotiate with government and investors' Medium 29 January 2024 <https://accountability.medium.com/heard-at-last-project-suspended-for-a-community-in-uganda-to-negotiate-with-government-and-3728fa1cbb5a> (accessed 16 September 2024); Independent Recourse Mechanism 'Wadelai Irrigation Scheme Project under the Farm Income Enhancement and Forestry Conservation Programme – Project 2 (Fiefoc-2)' <https://lnkd.in/e9vj8i5M> (accessed 16 September 2024).
40. Coalition for Human Rights in Development (n 18). /
41. 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' (2024) <https://rightsindevelopment.org/news/a-step-towards-justice-accountability-mechanisms-report-confirms-human-rights-violations-in-two-african-development-bank-projects-in-uganda/> (accessed 16 September 2024). IRM 'Lakes Edward and Albert Integrated Fisheries and Water Resources Management Project (LEAF)' (2023)
42. Center 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 16 September 2024).
43. As above.
44. 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 16 September 2024). In Coalition for Human Rights in Development (n 29). /
45. Taken from table 1 in ADB 'Highlights of ADB's Cooperation with Civil Society Organizations 2022' (2022) <https://www.adb.org/sites/default/files/institutional-document/879416/highlights-adb-cooperation-civil-society-2022.pdf> (accessed 16 September 2024).

46. See for example the recommendations of CSOs from a consultation in ADB consultation with CSOs in Manila in 2016. In ADB (n 45).
47. In ADB (n 45).
48. ADB 'How does the ADB engage Civil Society Organisations in its operations?' (2015)
<https://www.adb.org/sites/default/files/publication/177631/how-does-adb-engage-cso.pdf> (accessed 16 September 2024).
49. ADB (n 45).
50. AfDB 'Building climate resilience through youth and women farmers' (2022)
<https://cse.afdb.org/en/node/79> (accessed 16 September 2024).



List of Resources

The list of resources mentioned in this Toolkit are compiled below for easy referencing.

Finding the funder and identifying projects

- The International Accountability Project's Early Warning System: <https://ews.rightsindevelopment.org>

International and regional coalitions

- [Accountability Counsel](#)
- [Bank Information Centre](#)
- Coalition for Human Rights in Development: <https://rightsindevelopment.org>
- See also their Community Resource Exchange: <https://rightsindevelopment.org/collective-work/cre/> and Development's Defenders for Development Campaign: <https://rightsindevelopment.org/collective-work/did/>
- [FORUS](#)
- [Reality of Aid](#) Observatorio

Guidelines and policy papers

- Accountability Counsel, Bank Information Centre, Centre for International Environmental Law (CIEL), Centre for Research on Multinational Corporations (SOMO), Community Empowerment and Social Justice Network (CEMSOJ), Gender Action, Green Advocates International (Liberia), Inclusive Development International, International Accountability Project (IAP), Jamaa Resource Initiatives and urgewald e.V. 'Good Policy Paper: Guiding Practice from the Policies of the Independent Accountability Mechanisms' <https://accountabilitycounsel.org/wp-content/uploads/2021/12/good-policy-paper-final.pdf>

- Article19.org. The right to information around the world. <https://www.article19.org/right-to-information-around-the-world/>
- CEE Bankwatch Network and the Federation for Human Rights (FIDH)'s report 'More than money: Development Banks must strengthen human rights safeguards' (2024) <https://bankwatch.org/publication/more-than-money-development-banks-must-strengthen-human-rights-safeguards>
- Coalition for Human Rights in Development 'Misplaced trust: Why development banks should not rely on their clients to address reprisal risks' (2023) <https://rightsindevelopment.org/misplaced-trust/>
- Forus International 'Engaging Public Development Banks: Case studies of the African Development Bank, Asian Development Bank and Inter-American Bank' (2024) link?
- 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>
- Oxfam South Africa, Centre for Human Rights (University of Pretoria), Civil Society Forum New Development Bank 'Discussion Paper 1: Transparency and Accountability: 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>
- Oxfam 'How investments in financial intermediaries can be transparent and why they should be' (2018) <https://www.oxfam.org/en/research/open-books-how-investments-financial-intermediaries-can-be-transparent-and-why-they-should>
- United Nations 'Guiding Principles on Business and Human Rights' (2011) https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf

Tracking complaints to IAMs

- Accountability Counsel. The [Accountability Console](https://accountabilityconsole.com/) (data on all of the complaints filed to the accountability mechanisms over the past 30 years) <https://accountabilityconsole.com/>

PDB Toolkits

- Bank Information Centre 'Tools for Activists: An Information and Advocacy Guide to the World Bank Group' (2020) <https://bankinformationcenter.org/en-us/update/toolkit-for-activists/>
- Bank Information Centre 'Central Asia Civil Society Guide on Influencing World Bank Country Strategies' <https://re-course.org/wp-content/uploads/2021/11/Central-Asia-Civil-Society-Guide-on-Influencing-WB-Country-Strategies-1.pdf>
- Coalition for Human Rights in Development 'Toolkit on Understanding the African Development Bank' (2023) https://rightsindevelopment.org/tools_guides/understanding-the-afdb/
- Gender Action 'Gender Toolkit for International Finance Watchers' (2013) https://www.genderaction.org/publications/IFI-Watcher_Toolkit.pdf
- Gender Action 'IFI's Rhetorical Gender and Climate Promises' (2023) <https://www.genderaction.org/pdf/IFIs-Rhetorical-Gender-Climate-Promises.pdf>
- Independent Recourse Mechanism of the African Development Bank 'Anti-Retaliation Toolkit Addressing Risks of Retaliation in Complaint Management Independent Recourse Mechanism AfDB Group' (2023) <https://irm.afdb.org/en/documents/anti-retaliation-toolkit-en>

Examples of civil society collective statements

- 'Collective Civil Society Statement on ESF Draft (to the ADB): Calling for an Overhaul and immediate redrafting' (13 May 2024) <https://www.forum-adb.org/post/forumesfsubmission>
- 'Joint statement: Over 45 African and International Organisations call on the AfDB to open spaces for civil society and communities during the annual meetings and beyond' (23 May 2023) <https://rightsindevelopment.org/news/joint-statement-afdb-should-open-spaces-for-civil-society-and-communities/>
- 'Letter to IDB President by a coalition of CSOs' (31 August 2023) https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/665ff25b-318c-4bfa-a5ad-acc532db12fa_ENG-Letter+IDB+re+relationship+with+civil+society.pdf
- Joint submission by the Accountability Counsel, BIC, the Center for International Environmental Law, and Fundación para el Desarrollo de Políticas Sustentables to the IDB https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/969080a2-4182-4696-85ef-80e9a1d5a5f8_civil-society-response-to-ove-mici.pdf



References

- 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 16 September 2024)
- Accountability Counsel 'External investigation into alleged IFC cover-up must be robust and transparent' (2024) <https://www.accountabilitycounsel.org/2024/04/external-investigation-into-alleged-ifc-cover-up-must-be-robust-and-transparent/> (accessed 16 September 2024)
- Accountability Counsel 'Inter-American Development Bank (IDB) | Independent Consultation and Investigation Mechanism (MICI) (accessed 16 September 2024)
- Accountability Counsel et al 'Good Policy Paper: Guiding Practice from the Policies of the Independent Accountability Mechanisms' (2021) <https://accountabilitycounsel.org/wp-content/uploads/2021/12/good-policy-paper-final.pdf> (accessed 16 September 2024)
- ADB 'Highlights of ADB's cooperation with civil society organizations 2022' (2022) <https://www.adb.org/sites/default/files/institutional-document/879416/highlights-adb-cooperation-civil-society-2022.pdf> (accessed 16 September 2024)
- ADB 'How does ADB engage civil society organisations in its operations? Findings of an Exploratory Inquiry in South Africa' (2015) <https://www.adb.org/publications/how-does-adb-engage-civil-society-organizations-its-operations> (accessed 16 September 2024)
- ADB 'Where we work' <https://www.adb.org/where-we-work/documents/country-strategies-programs-under-preparation> (accessed 16 September 2024)
- AfDB 'Building climate resilience through youth and women farmers' (2022) <https://cse.afdb.org/en/node/79> (accessed 16 September 2024)
- AfDB 'Integrating the community perspective into the performance review of Burkina Faso's country portfolio' (2023) <https://cse.afdb.org/pages/news/integrating-community-perspective-performance-review-burkina-fasos-country-portfolio> (accessed 16 September 2024)

- 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' (2024) <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 16 September 2024)
- AfDB 'Report on the Implementation Review of the Disclosure and Access to Information (DAI) Policy 2012-2021' (2022) <https://www.afdb.org/en/documents/report-implementation-review-disclosure-and-access-information-dai-policy-2012-2021> (accessed 16 September 2024)
- 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 16 September 2024)
- Bank Information Centre 'Access to information: Is the IFC leaving communities in the dark?' (2021) <https://bankinformationcenter.org/en-us/update/access-to-information-is-the-ifc-leaving-communities> (accessed 16 September 2024)
- Bank Information Centre 'Forming coalitions to advocate for bank reforms' https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/0f63d77e-db0f-4f13-b99f-1cab98412189_Forming+coalitions+to+advocate+for+bank+reforms.docx.pdf (accessed 16 September 2024)
- Bank Information Centre 'IDB policy review overlooks the most important barrier to access to information' (2020) <https://bankinformationcenter.org/en-us/update/idb-policy-review-overlooks-the-most-important-barrier/> (accessed 16 September 2024)
- Bank Information Centre 'Tools for activists: An Information and Advocacy Guide to the World Bank Group' (2020) <https://bankinformationcenter.org/en-us/update/toolkit-for-activists/> (accessed 16 September 2024)
- Center 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 16 September 2024)
- Coalition for Human Rights and Development 'African CSOs urge AfDB to strengthen civil society involvement' (2016) <https://rightsindevelopment.org/news/african-csos-urge-afdb-to-strengthen-civil-society-engagement/> (accessed 16 September 2024)
- Coalition for Human Rights in Development 'A step towards justice: AfDB Accountability Mechanism's report confirms human rights violations in two projects in Uganda' (2024) <https://rightsindevelopment.org/news/a-step-towards-justice-accountability-mechanisms-report-confirms-human-rights-violations-in-two-african-development-bank-projects-in-uganda/> (accessed 16 September 2024)
- Coalition for Human Rights and Development 'Civil society groups expelled from AfDB annual meetings' (2024) <https://rightsindevelopment.org/news/afdbam2024-civil-society-expelled/> (accessed 16 September 2024)
- 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 16 September 2024)
- Coalition for Human Rights in Development 'Demystifying development finance: How public development banks impact people and the planet' (2023) <https://rightsindevelopment.org/pdbs/> (accessed 16 September 2024)

- Coalition for Human Rights and Development 'Joint Statement: AfDB should open space for civil society and communities' (2023) <https://rightsindevelopment.org/news/joint-statement-afdb-should-open-spaces-for-civil-society-and-communities/> (accessed 16 September 2024)
- Coalition for Human Rights in Development 'Misplaced trust: Why development banks should not rely on their clients to address reprisal risks' (2023) <https://rightsindevelopment.org/misplaced-trust/> (accessed 16 September 2024)
- Coalition for Human Rights and Development 'The importance of creating space for meaningful civil society engagement at the 2024 AfDB annual meetings' (2024) <https://rightsindevelopment.org/news/the-importance-of-creating-space-for-meaningful-civil-society-engagement-at-the-2024-afdb-annual-meetings/> (accessed 16 September 2024)
- Coalition for Human Rights and Development 'You're not allowed here: My first experience at the African Development Bank's Annual meeting' (2024) <https://rightsindevelopment.org/news/blog-afdb-annual-meeting-2024/> (accessed 16 September 2024)
- Coalition for Human Rights in Development 'Wearing blinders: How banks are ignoring reprisal risks' (2023) <https://rightsindevelopment.org/wearing-blinders/> (accessed 16 September 2024)
- Finance in Common 'Why Finance in Common?' [https://financeincommon.org/why-finance-in-common#:~:text=Public%20Development%20Banks%20\(PDBs\)%20are,by%20central%20or%20local%20governments](https://financeincommon.org/why-finance-in-common#:~:text=Public%20Development%20Banks%20(PDBs)%20are,by%20central%20or%20local%20governments) (accessed 16 September 2024)
- Independent Development Evaluation African Development Bank 'Evaluation of the AfDB's engagement with civil society: An IDEV Corporate Evaluation Summary Report' (2021) https://www.afdb.org/sites/default/files/documents/evaluation-reports/engagement_with_civil_society_en_web.pdf (accessed 16 September 2024)
- Independent Recourse Mechanism 'Wadelai Irrigation Scheme Project under the Farm Income Enhancement and Forestry Conservation Programme – Project 2 (Fiefoc-2)' <https://lnkd.in/e9vj8i5M> (accessed 16 September 2024)
- International Rivers 'Civil society organizations continue to call for more effective consultation processes from the Inter-American Development Bank' (2023) <https://www.internationalrivers.org/news/civil-society-organizations-continue-to-call-for-more-effective-consultation-processes-from-the-inter-american-development-bank%E2%82%AC/> (accessed 16 September 2024)
- IRM 'Lakes Edward and Albert Integrated Fisheries and Water Resources Management Project (LEAF)' (2023) <https://t.co/sg9f6O8gp3> (accessed 16 September 2024)
- Mwebe, J 'After attacks, a community in Uganda unites to fight for their land' *Medium* 21 April 2022 <https://accountability.medium.com/after-attacks-a-community-in-uganda-unites-to-fight-for-their-land-78fc27944315> (accessed 16 September 2024)
- Mwebe, J 'Heard at last: Project suspended for a community in Uganda to negotiate with government and investors' *Medium* 29 January 2024 <https://accountability.medium.com/heard-at-last-project-suspended-for-a-community-in-uganda-to-negotiate-with-government-and-3728fa1cbb5a> (accessed 16 September 2024)
- NGO Forum on ADB 'Collective Civil Society Statement on ESF Draft (to the ADB): Calling for an overhaul and immediate redrafting' (13 May 2024) <https://www.forum-adb.org/post/forumesfsubmission> (accessed 16 September 2024)
- Publish What you Fund 'Do DFIs engage with local communities – An interview with Rayyan Hassan' (2021) <https://www.publishwhatyoufund.org/2021/02/do-dfis-engage-with-local-communities-an-interview-with-rayyan-hassan/> (accessed 16 September 2024)

- Realty of Aid 'CSO Collective Statement for the 56th ADB Annual Meeting' (2023) <https://realityofaid.org/cso-collective-statement-56th-agm/> (accessed 16 September 2024)
- Realty of Aid 'CSO Partnership for Development Effectiveness, IBON International. ADB: Mi(shaping) development cooperation and effectiveness in Asia Pacific: A CSO Review of ADB's development effectiveness' <https://realityofaid.org/asian-development-bank-misshaping-development-cooperation-and-effectiveness-in-asia-pacific-a-cso-review-of-adbs-development-effectiveness/> (accessed 16 September 2024)
- The Voices of Communities Affected by Business 'Successes and weaknesses in the Sendou Coal Plant' Alysagne 12 August 2020 <https://alysagne.wordpress.com/2020/08/12/successes-and-weaknesses-in-the-case-of-the-sendou-coal-power-plant/> (accessed 16 September 2024)
- UN General Assembly, Universal Declaration of Human Rights, 217 A (III), 10 December 1948 <https://www.un.org/en/about-us/universal-declaration-of-human-rights> (accessed 16 September 2024)
- 2024)
- Wadekar, N 'World Bank financing arm rejects calls to directly compensate victims of harm at Kenya schools' The Intercept 12 June 2024 <https://theintercept.com/2024/06/12/kenya-bridge-schools-abuse-harm-world-bank/> (accessed 16 September 2024)
- Zuckerman, E 'A people's history of the World Bank' <https://peopleshistoryimfwb.iboninternational.org/2024/04/15/the-bretton-woods-institutions-colonial-paradigm/> (accessed 16 September 2024)



Forus is a member-driven network of 69 national NGO platforms and 7 regional coalitions from all continents, representing more than 22,000 NGOs active locally and internationally on development, human rights and environmental issues.

This publication was produced with the support of the Agence française de développement (AFD) and the European Union. The contents of this publication are the sole responsibility of Forus.



In partnership
with



Funded by
the European Union

For more information

Email: contact@forus-international.org

Website: www.forus-international.org
