

Speaking Up for Gender: A Step-by-Step Guide to Holding IFIs Accountable

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Supported by



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About Gender Action

Gender Action was established in 2002. It is the only organization dedicated to promoting gender justice and women's rights in all International Financial Institution (IFI) investments such as those of the World Bank.

Gender Action's goal is to ensure that women and men equally participate in and benefit from all IFI investments.

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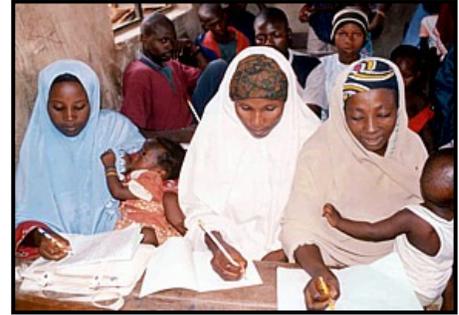
List of Acronyms

ADB	Asian Development Bank
AfDB	African Development Bank
AIDS	Acquired Immune Deficiency Syndrome
BTC	Baku-Tbilisi-Ceyhan Oil Pipeline Project
CAO	Compliance Advisor/Ombudsman (IFC)
CRMU	Compliance Review and Mediation Unit (AfDB)
CRP	Compliance Review Panel (ADB)
EBRD	European Bank for Reconstruction and Development
HIV	Human Immunodeficiency Virus
ICIM	Independent Consultation and Investigation Mechanism (IDB)
IDB	Inter-American Development Bank
IFI	International Financial Institution
IFC	International Finance Corporation
IP	Inspection Panel (WB)
IRM	Independent Recourse Mechanism (EBRD; AfDB)
OM	Operations Manual
OP	Operational Procedure
SPF	Special Project Facilitator (ADB)
STDP	Sri Lanka Southern Transport Development Project
WB	World Bank

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Speaking up for Gender: A Step-by-Step Guide to Holding IFIs Accountable



Introduction

This Guide aims to be both a user-friendly and valuable tool in providing you with information, tips and guidelines for submitting a complaint to an IFI accountability mechanism. IFIs have committed to reducing poverty, promoting gender equality and empowering women through their policies and action plans. However, these gender aware policies and plans are not always implemented, resulting in IFIs falling short of attaining expected results. Furthermore, these institutions continue to finance projects that often ignore gender inequalities and increase poverty, sex work, violence, and HIV/AIDS among women and girls.



For example the World Bank continuously increases financing for fossil fuel projects, putting over 3 billion dollars into these types of investments in 2008 alone. “Dirty investments” like these have a disproportionately negative effect on women. Female citizens are usually underrepresented in consultations for incoming IFI projects that affect their living environments and livelihoods, yet they bear the brunt of the negative impacts that stem from these investments. Daily activities that are mostly performed by women in the global south, like collecting water, firewood, and farming are often affected by increased pollution and contamination that come as a result of dirty investments. In addition to the negative environmental impacts, project areas experience an influx of migrant workers which have been linked to the spreading of disease, increases in gender based violence, women headed households and human trafficking. Women are hence disproportionately affected by these negative impacts, their time being used to care for the “unintended” consequences of economic investments. Moreover, these poorly planned IFI investments tend to create few sustainable income generating activities for women, further contributing to their income instability (Gender Action 2006, 2007, 2008).

This new guide encourages affected communities to hold IFIs accountable for gender impacts through taking gender discrimination complaints to IFI accountability mechanisms. The guide provides basic information on how and when to submit a claim to each IFI’s accountability mechanism.

Part I of this guide lists steps and considerations that need to be taken when bringing a complaint to an accountability mechanism. It gives a fictitious example of a World Bank and African Development Bank project that might have harmful gender-related impacts, and uses this example to guide the reader through the complaint process. Part II shows

how to access each IFI's accountability mechanism. It contains essential information for communities seeking to submit a claim to an accountability mechanism. Part III presents several real-life cases in which gender-related impacts could have been the subject of complaints to accountability mechanisms.

Part I: IFI Accountability Mechanisms

"... a development institution whose mission is to reduce global poverty should always employ compassion and never lose sight of its policy aspirations, engaging the poorest stakeholders and listening to people and communities on the ground. The work of the [Inspection] Panel has allowed us to hear those voices when we needed to, and has provided an avenue for resolution and restitution." Alexey Kvasov Executive Director, Russian Federation & Dean of the Board of Directors, World Bank (Kvasov 2009:2).

To provide civil society with a mechanism to voice concerns about real or potential negative or harmful impacts of investments, IFIs have established semi-independent "accountability mechanisms" where those who feel harmed by IFI investments may voice their concerns. These IFI mechanisms try to ensure that the IFI social and environmental standards and policies, set out by IFIs themselves, are met. These standards include gender policies¹ directing the IFIs to prevent damaging impacts particularly affecting women who are the majority of the world's poor and suffer the most from gender discrimination.

Accountability mechanisms give affected communities a possible means to seek compensation for or prevent damage they suffer or may suffer from IFI investments. Past complaints taken to IFI accountability mechanisms raised concerns about environmental impacts, involuntary resettlement, and lack of adequate information being made available to the community. Accountability mechanisms have not yet been used to address gender discrimination issues, although doing so is legally feasible (Gender Action and CIEL 2007).

¹ Despite their shortcomings, IFI policies and guidelines do contain positive aspects, such as calling for men and women to be treated as equal stakeholders in all projects.

It is possible to take a claim to an IFI institution for violating their stated policy if an IFI project in your area/country has not considered and accounted for:

- **Social and health impacts.** Does the project have disproportionately negative social and health effects on women, especially regarding access to family planning and maternal care?
- **Resettlement issues.** Are there social and legal structures that restrict women's rights to own property and land titles and receive compensation?
- **Environmental impacts.** Does the project make it more difficult for women to participate in livelihood activities (such as farming), and/or does the project negatively affect their daily needs and activities (e.g. food, water and fuel collection)?
- **Infrastructure impacts.** To what extent does the project, through practices such as new land zoning, limit and impair women's access to natural resources and livelihood opportunities?
- **Indigenous rights.** What are the impacts on indigenous communities, particularly regarding participation and representation of local women in all phases of the project? Was the project prepared without consultations with indigenous women?

See the IFI Resource Pages in Part II for a summary of each IFI's Gender Policies and instructions on how to submit a claim to each IFI's accountability mechanism.

Taking a complaint to an IFI Accountability Mechanism

Example Scenario

You have heard that the construction of a coal mine will soon begin in a poor region of your country where several different ethnic communities currently live. The coal mine is financed by the World Bank and the African Development Bank. Resettlement of some communities, from areas near or on the large area slated to be strip mined to areas with a smaller underground water supply are in the project proposal. Due to the country's cultural and legal practices, women do not own land and did not participate in meetings between the borrower government and communities, which were held prior to the loan being approved. Women are mainly responsible for many essential daily activities within these communities, such as collecting clean water, fuel and firewood, and growing crops for household consumption. However, according to their social norms they do not participate in conversations with outside entities.

You and your organization, which works with all ethnic local communities, particularly with women, are concerned about the potential impacts of this project. You are specifically worried that the project could make it more difficult for women to access water and firewood for cooking, growing traditional crops, and fulfilling other community and household needs. You are also concerned that the project will attract a large population of migrant men and consequently increase sex trafficking and sexually transmitted diseases, including HIV/AIDS, and deepen poverty along the construction areas (Gender Action 2006, 2009). Finally, you think that the project will have unequal benefits, positively impacting men while women are likely to be harmed and excluded from any direct compensation.

What can be done?

The World Bank and African Development Bank (as well as all other IFIs²) are required to take measures to ensure that their projects do not hurt but rather benefit communities, individual men and women, and the environment. The Banks' policies require that the Banks address gender differentiated impacts – project consequences that affect men and women differently.

If an IFI project fails to comply with IFI policy requirements, including gender policies, community members can complain to an "accountability mechanism" comprised of a panel of "judges" who are semi-independent from the IFIs and have the power to work with the institutions' Boards of Directors in order to change the Banks' project implementation.

When can these mechanisms be used?

Accountability mechanisms cannot respond to complaints until communities have first tried and failed to work directly with the IFI's project team to resolve issues. The IFI Resource Pages in Part II direct you to websites where you can search for IFI representatives in your country.

Before approaching Bank staff, communities must ask themselves: What are the likely and/or existing project impacts on the communities – its men, women, children and the elderly? What is the current status of the project? Is it in the design, implementation or completion stage? For example, if a project is only in the initial stages of design and implementation, then those bringing a complaint should determine the likely harmful impacts that will adversely affect the community. For projects that have been completed the actual project impacts should be determined and documented. Additionally, those bringing a complaint should verify whether women in all affected groups have been adequately consulted, and whether the likely adverse impacts on women have been specifically noted, as it is women who are often those most affected by IFI investments.

What information do the IFIs provide?

The person directing the project for the IFI is the best suited to answer your questions related to the project.³ Information about IFI projects can also be obtained from IFI websites and staff, governments, and civil society organizations.⁴ If your country has an IFI country office, its director and staff should also be able to answer your questions

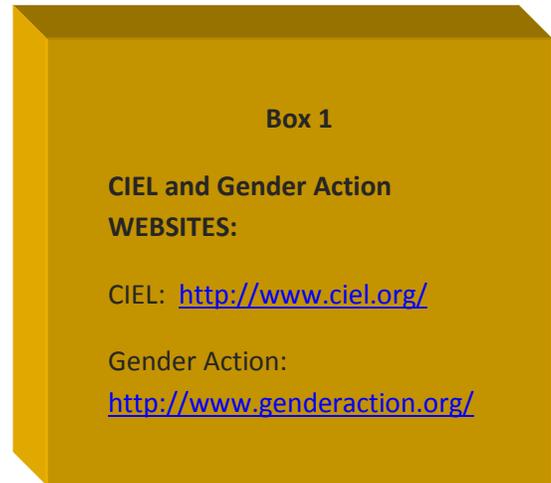
² Each IFI has their own accountability mechanism. See Part II for the name and contact information of each of these mechanisms.

³ For example at the World Bank, the project director is called the "task team leader"; at the African Development Bank, this person is referred to as the "team leader".

⁴ See Part II for IFI website addresses.

and provide you with the project team leader's contact information. You can also seek the assistance of civil society organizations such as The Center for International Environmental Law (CIEL), Gender Action, and other global or local organizations that monitor IFI projects to obtain project documents and information.

To see what type of information can be obtained at different stages of the project cycle please see each IFI's corresponding Resource Page in Part II of this guide.



Box 1

CIEL and Gender Action WEBSITES:

CIEL: <http://www.ciel.org/>

Gender Action: <http://www.genderaction.org/>

What can be done with this information?

After you have collected information about a project that could harm you and/or your community, it is important to contact the IFI as soon as possible – ideally before the project is approved. You can file a complaint with the accountability mechanism at any stage in the project cycle. However, filing a complaint before the project has been approved by the IFI's Board of Directors may help prevent negative impacts to you and/or local communities.

Be sure to document every contact with IFI staff – keep emails and written notes of all exchanges. This will help to ensure accountability on the part of those individuals at the IFIs that you communicate with. It is important to reiterate that you must first contact IFI staff to give the IFI a chance to resolve your issue before it can be considered by an accountability mechanism.

If the IFI fails to address your concerns, a complaint can and should be submitted to the appropriate accountability mechanism for consideration. Part II will indicate the specific requirements of each IFI when bringing forth a complaint.

Will a complaint be useful?

Filing a complaint with an accountability mechanism is a lengthy process and you may have to follow the complaint for several years. Additional efforts to pressure the IFIs include: i) Highlighting the issue in the media; ii) Securing support for your efforts from local, regional and/or global individuals and groups who are willing to write letters and make calls on your behalf; and iii) Meeting with members of the Board of Directors at the IFIs, who might help you to achieve satisfactory results from your complaint. Accountability Mechanisms report to IFI Boards of Directors who represent IFI member governments. They will ultimately decide what actions the IFI should take in response to your complaint after the accountability mechanism has finished its investigation. Thus,

requesting meetings with Board Members to inform them of the complaint and explain your case may also be useful in obtaining positive results.

If you take a complaint to an accountability mechanism before project approval, you may be able to influence the Board of Directors to not approve or to delay the approval of the project. If project approval is delayed, the Board of Directors might attempt to ensure that the loan agreement between your government and the Bank addresses your concerns. Once the project has been approved, the Board of Directors might instruct the Bank staff to apply new measures that could reduce harmful impacts to the affected communities.

You and local communities will need to monitor project follow up to make sure that the measures proposed to address your complaint are implemented correctly and effectively to achieve the desired results. It is also important to note that harmed individuals and communities are not always completely satisfied with the results of a complaint, even when achieving some project improvements.

How is a complaint filed?

Your complaint to an accountability mechanism is presented in a letter that contains several pieces of key information. In your letter, you should: i) identify yourself or the people filing the complaint and where they live; ii) include a brief project description; iii) explain how you or the local community's rights or interests have been (or are likely to be) negatively affected, and describe other potential harm resulting from the project; and iv) narrate what you or the local community did to address your complaints with Bank staff and what the response was.⁵ Be sure your letter meets the requirements⁶ for filing a "complaint" with the specific IFI involved.

The letter need not identify⁷ the IFI policies that have been violated, although it may be useful to do so. Some key gender-related IFI policies are summarized in each of the IFI Resource Pages in Part II of this guide.

⁵ Each IFI resource page found in Part II has a sample letter outline to follow when filling a complaint with an accountability mechanism.

⁶ Specific requirements for filling a complaint with each IFI accountability mechanism can be found in Part II.

⁷ The AfDB's Independent Review Mechanism recommends you identify the policy that has been allegedly breached.

A complaint taken to the World Bank's Inspection Panel with positive results

- Honduras: Land Administration project -

A claim brought to the World Bank Inspection Panel (IP) on January 3, 2006, approximately two years after the project approval date, stated that violations of the Bank's policy and procedures had been harmful to the Garifuna, an indigenous community of Honduras, and their claims to land. The negligence from the World Bank in preparing this project had endangered the survival of Garifuna communities. The *Organizacion Fraternal Negra Honduras*, a local civil society organization, submitted the claim on behalf of the Garifuna people.

The World Bank project was developed to support and facilitate implementation of a government land registration and administration project. The main complaint brought to the IP was that the Garifuna communities were not consulted and their rights were not taken into account within the project, thus violating the World Bank policy on Indigenous peoples. They feared that by not taking the rights of the community into account, land titling and procedures provided under the project would ultimately cause loss of Garifuna ancestral lands and collective property in favor of individual property. The Garifuna were also concerned that their ancestral land would be given to people that were not a part of the Garifuna community.

The IP found that the request made by the Garifuna community met the eligibility requirements for investigation and began to gather relevant information for the investigative report. After extensive research, the IP submitted its findings to the Board of Executive Directors on June 12, 2007.

The IP investigation found that the Garifuna had experienced ancestral land loss on multiple occasions due to various factors related to the World Bank project. By not taking into account the importance of ancestral lands the Bank infringed on its Indigenous Peoples safeguard policy that calls on WB staff to determine whether or not the indigenous groups affected have "collective attachment" to the project area. Another WB policy where there was non-compliance included a mandate for conducting informed consultations with all affected communities. The IP found that several meetings had been held with community organizations on the project; however access to information was not provided or disseminated to outside members of several competing Garifuna organizations, meaning that a segment of the affected indigenous population was not consulted. The IP also found that the Bank's project team conducted insufficient research on property laws that would affect the Garifuna community. Based on these findings and others (see WB 2008 for a complete analysis of the investigation) the World Bank team that managed this program created an Action Plan to address issues of non-compliance noted by the IP. The Board of Directors approved the Action Plan which is subject to progress reports to be submitted to the Board for ongoing supervision of the redress to the non-compliance.

What happens to the complaint?

Each IFI has its own method of processing and investigating a complaint, although most IFI accountability mechanism processes are similar to that of the World Bank. When a complaint is filed with the World Bank Inspection Panel, for example⁸, the Panel will determine whether it is “eligible” to be considered by the Panel using three main criteria. First, the Panel will consider whether there are at least two individuals from the community (or outsiders authorized by the community) that may be harmed. Next, it will examine whether the description of existing (or potential) harm to the community indicates a failure by the Bank to apply its policies (such as those listed in the World Bank Resource Page in Part II) correctly. Finally, the Panel will determine whether the community has attempted to resolve these issues with Bank staff before they filed the complaint.

If the Panel determines that the complaint is eligible, it will request a report from Bank staff, who have 20 days to respond. If, after reviewing the staff’s response to the complaint, the Panel decides that policy violations did occur, it will recommend to the Board of Directors that the complaints be investigated within 21 days.

If the Board decides that a request shall be investigated – and it almost always does when the Inspection Panel recommends it – the Panel will collect information from the community, Bank staff, and others and prepare a report for the Board describing its findings and conclusions. Usually, Panel members will visit and collect data first-hand from the affected community members.

Bank management will be given a chance to respond to the Inspection Panel’s report, and, often, will seek to develop an “Action Plan”. This Action Plan usually outlines the steps the project team will take to resolve community concerns. Within two weeks of receiving the project team’s Action Plan or response, the Board of Directors will consider and possibly approve the action plan⁹ to be implemented immediately upon approval.

Some IFI mechanisms, such as the one at the African Development Bank, include a “problem-solving” function in addition to the other processes mentioned here. This function aims to restore the dialogue between the complainants and the Bank.

⁸ For specific complaint eligibility information please refer to Part II.

⁹ For examples of how the WB Inspection Panel has handled past claims see reports such as: *The Inspection Panel Annual Report* July 1, 2007 to June 30, 2008. Available at: <http://web.worldbank.org/WBSITE/EXTERNAL/EXTINSPECTIONPANEL/0,,contentMDK:20311664~menuPK:64129472~pagePK:64129751~piPK:64128378~theSitePK:380794,00.html>

CHECKLIST FOR FILING A COMPLAINT

- ✓ **Gather information** – Is an IFI involved in a project harming you or your community?
 - How? And Why?
 - Who is being harmed? (men, women, children, elderly)
 - Are some groups in the community more vulnerable than others?
 - What and where is the project?
 - Who is the contact person at the IFI's local office and/or headquarters?
- ✓ **Contact the IFI** – Explain your concerns and request that the IFI addresses them. Be sure to always document every contact you have with the IFI.
- ✓ **Consider the pros and cons of using the accountability mechanism** – If necessary, seek assistance to evaluate options.
- ✓ **Prepare letter of complaint** – If you decide to use the accountability mechanism, you will need to prepare a letter of complaint. This letter should include the name/s of those filing the complaint, a brief project description, how the project is or is likely to be harmful, and when and who was contacted at the IFI to address your complaint before preparing a formal complaint.
- ✓ **Keep in touch with the accountability mechanism** – Provide information, request updates and look for opportunities to participate in the process.
- ✓ **Publicize the situation** – Use the pressure of media scrutiny (e.g. national and international newspapers, radio, etc.) and civil society groups to compel the IFI to resolve the issues you have identified.
- ✓ **Monitor the implementation of recommendations** – Bring shortcomings related to your complaint to the attention of the accountability mechanism.

Part II: IFI Accountability Mechanism's Resource Pages

An Introduction to Using this Section

How Using these Resource Pages Can Help You:

The Resource Pages that follow offer the reader valuable insight into the accountability process of each IFI, explaining specificities unique to each mechanism. Here, you will find contact information for each of the IFIs, including links that will take you directly to regional information pages and project documents. You will also find a useful chart illustrating each respective IFI project cycle. Additionally, you will see some useful recommendations to consider while compiling your claim. Each page contains information regarding each IFI gender policy as well as a list of electronic resources that may be useful to reference during the complaint process. Finally, you will find a sample request form that you can use to help guide you while writing your complaint to the accountability mechanism. We hope that this guide will ultimately help you attain desired results when holding IFI's accountable for the negative impacts their programs may have in achieving gender equality.

How to Use These Resource Pages:

1. At the top of the page you will find the title of the IFI you are trying to contact and the name of their accountability mechanism
2. Under "Contact Information", you will be able to find the address, telephone number, email and fax number for the accountability mechanism. You will also find links that will direct you to information regarding the IFIs Executive Directors, Board Members, and project documents.
3. On the right hand side, you will be able to find a diagram of the IFIs project cycle.
4. In the bottom left corner, you will find some important information regarding project documents for the IFI.
5. In the bottom right hand corner, you will find information regarding the IFIs stated gender policies.

The screenshot shows a webpage titled "Contacting the World Bank Inspection Panel". It is divided into several sections:

- Contact Information:** Lists the World Bank Inspection Panel's address (1818 H Street NW, Washington DC, 20433, USA), phone (+202-458-5200), fax (+202-522-0916), and email (ipanel@worldbank.org). It also provides links to contact Executive Directors for Africa and Latin America, and a link to find information on projects in a specific country.
- Project Documents:** A section with bullet points explaining the project cycle phases (Strategy and Identification, Preparation and Appraisal, Implementation, Evaluation) and providing links to various documents like the Project Information Document (PID), Resettlement Action Plan (RAP), and Environmental Assessment.
- The World Bank's Gender Policy:** A section detailing the bank's commitment to gender equality, including a list of key principles such as ensuring task teams address local circumstances, contributing to gender equality, and consulting with vulnerable populations.
- Diagram:** A circular diagram on the right side of the page illustrates the project cycle with the following stages: Identification, Preparation, Appraisal, Negotiation, Implementation, Evaluation, and a central loop for "World Bank Consulting Services".

Numbered callouts on the page indicate the following locations:

- 1:** Points to the title "Contacting the World Bank Inspection Panel".
- 2:** Points to the "Contact Information" section.
- 3:** Points to the "The World Bank's Gender Policy" section.
- 4:** Points to the "Project Documents" section.
- 5:** Points to the "The World Bank's Gender Policy" section.

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Resources:

To learn more about the Inspection Panel process, visit: <http://www.worldbank.org/OP/IR/IRHome>

Click here to see a sample request form written by the World Bank: <http://www.worldbank.org/OP/IR/IRHome>

For more information on filing a complaint, visit: <http://www.worldbank.org/OP/IR/IRHome>

World Bank Sample Request Form to the Inspection Panel:

Identify yourself and any other requestors and include your contact information (address, telephone, fax, email).

We, [insert your name], live and/or represent [insert community name], who live in [insert country, area, region]. Our addresses are attached.

Include a brief description of the World Bank project, including the name and location.

The name of the project that has harmed us, or that will likely harm us is [project name], located in [country/area/region].

Explain how the community is, or will likely be, harmed by the World Bank project.

This project has harmed us the following ways: [list negative effects of the project here and why they are so damaging].

Include any policies, documents or operations which you think the World Bank has violated with this project.

We believe the World Bank has failed to follow its operational procedures and guidelines, specifically [list policies, panel].

Describe the steps you have already taken with Bank staff to address your complaint, and how their answers were inadequate.

We have previously complained to World Bank staff on the following occasions: [list dates here] by [explain how your complaint was made]. These exchanges have inadequately addressed our concerns because [explain]. We therefore wish to take our complaint to the Inspection Panel.

We request the Inspection Panel recommends to the Executive Directors that an investigation of these matters be carried out.

Include the signatures of those requesting the investigation as well as the date. Attach all correspondence with Bank staff, any notes, a map or diagram of the project area (if needed) and any other evidence which supports your request.

Produced by Gender Action and CSJ, February 2010

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6. At the top of the second page, you will find more online resources that may be useful for you to access when gathering essential information on IFI projects and processes before you file a complaint with an accountability mechanism. These links will take you to pages where you can find more information on submitting a complaint. Among these resources you will also find information about your corresponding Country Office.

7. Finally, you will find a sample request form to guide you through the complaint writing process. Use this as a tool to help you formulate your complaint.

Checklist—Before you file your complaint:

⇒ **Gather information** – What and where is the project? Who is the contact person at the IFI's local office and/or headquarters? Is the IFI project harming you or your community?

- ◆ How? And Why?
- ◆ Who is being harmed? (men, women, children, elderly)
- ◆ Are some groups in the community more vulnerable than others?

⇒ **Contact IFI Staff** – Explain your concerns and request that the IFI address them. Be sure to always document contacts with any staff from the IFI.

⇒ **Consider the pros and cons of using the accountability mechanism** – If necessary, seek assistance to evaluate options.

⇒ **Prepare a complaint** – If you decide to use the accountability mechanism.

⇒ **Keep in touch with the accountability mechanism** – Provide information, request updates and look for opportunities to participate in the process.

⇒ **Publicize the situation** – Bring the pressure of media scrutiny (e.g. national and international newspapers, radio, etc.) and civil society groups to compel the IFI to resolve the issues.

⇒ **Monitor the implementation of recommendations** – Bring shortcomings to the attention of the accountability mechanism.

Key Points to Remember:

- Keep a paper trail: Always keep notes about your contacts with the Bank. This includes emails, meetings and phone calls.
- Compile a list of the policies you believe the IFI has violated.
- Remember, you can submit a claim at any point in the project cycle.
- Do not hesitate to contact the Executive Director of your country; let them know you have submitted a claim to the accountability mechanism.
- Attach any photos, maps, diagrams concerning the Project that support your claim

Contacting the World Bank Inspection Panel

Contact Information:

World Bank Inspection Panel
 1818 H Street NW
 Washington DC, 20433 USA
 Tel: + 1 202 458 5200
 Fax: + 1 202 522 0916
 Email: ipanel@worldbank.org

Visit the [Inspection Panel Website](#)

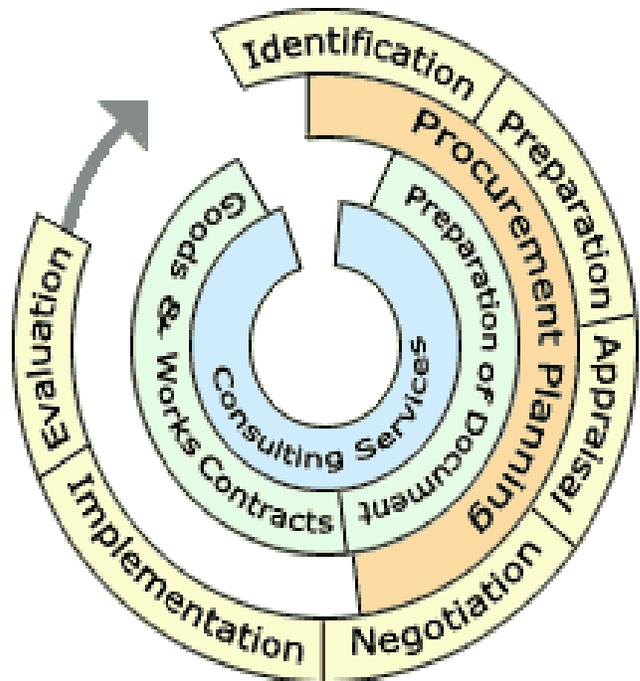
Find Board Members in [Africa](#).

Find Board Members in [Asia](#).

Find Board Members in [Europe and Central Asia](#).

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Find Board Members in [Latin America](#).



Project Documents:

- During the "Identification" phase there are no publicly disclosed documents. During this first stage, a confidential Project Concept Document is prepared; you can obtain a copy upon request.
- During the next two World Bank project phases– the "Preparation" and "Appraisal" phases – a "Project Information Document (PID)" – is made publicly available. The PID summarizes: (i) The Project Concept Document; (ii) The Resettlement Action Plan (RAP) (a plan prepared if the Bank plans to resettle anyone); and (iii) The Environmental Assessment (a document describing the possible environmental and social impacts of the project).
- After the project documents are prepared, the World Bank and borrower government negotiate the project's loans agreement. Before the World Bank Board of Directors approves the project, full copies of project documents must be released.
- Remember, you can submit a claim at any point during the project cycle until the project is closed or 95 percent of funds have been disbursed. Learn more about the World Bank Project Cycle [here](#).

Gender At the World Bank:

- Task teams must ensure that the project design addresses:
 - the local circumstances that may affect the different or unequal participation of women and men in the project;
 - the contribution that women and men can make to achieve the project's objectives;
 - the ways in which the project may be disadvantageous to one gender compared to another;
 - the project's proposed mechanisms for monitoring the different impacts of the project on women and men, girls and boys.
- Consultations with, and benefits for, indigenous peoples must treat men and women equally.
- During resettlement, special attention must be paid to vulnerable populations, including women.
- View the full text of the World Bank's [Gender Policy \(OP 4.20\)](#).

Electronic Resources:

- Contact your [Executive Director](#).
- Find information on [projects](#) in your country.
- Learn more about the World Bank [Inspection Panel process](#).
- See [past cases](#) taken to the World Bank Inspection Panel.
- Read and request [publications](#) from the World Bank Inspection Panel.
- [Frequently Asked Questions](#) about the World Bank Inspection Panel.
- See [information on filing a complaint](#) at the World Bank Inspection Panel.
- View a [sample request form](#) for filing a complaint at the World Bank Inspection Panel, also presented below.

Sample Request Form to Submit for Investigation to the World Bank Inspection Panel:

Adapted from the World Bank Inspection Panel brochure.

Identify yourself and any other requestors and include your contact information (address, telephone, fax, email). Include the name and address of any representative and proof of their qualifications.

We, [\[insert your name\]](#), live in and/or represent [\[insert community name\]](#) who live in [\[insert country, area, region\]](#). Our addresses are attached.

Include a brief description of the World Bank project, including the name and location.

The name of the project that has harmed us, or that will likely harm us is [\[project name\]](#), located in [\[country/area/region\]](#).

Explain how you think this project has, or will, directly and adversely affect the rights and interests of the people living in this community, particularly women and men.

This project has or will harm us the following ways: [\[list potential or real negative effects of the project here and why they are so damaging\]](#).

If known, include any policies, documents or operations which you think the World Bank has violated as a result of this project, such as the World Bank Gender Policy (OP 4.20).

We believe the World Bank has failed to follow its operational procedures and guidelines, specifically [\[list policies here\]](#).

Describe the steps you have already taken with Bank staff to address your complaint, and how their answers were inadequate. Request that the World Bank Inspection Panel proposes an investigation of the project.

We have previously complained to World Bank staff on the following occasions: [\[list dates and names of World Bank staff\]](#) by [\[explain how your complaint was made\]](#). We have received no response [or] we have received a response and we are not satisfied that the explanations and answers solve our problems for the following reasons: [\[list reasons here\]](#).

We request the Inspection Panel recommends to the World Bank's Executive Directors that an investigation of these matters be carried out.

Include the signatures of those requesting the investigation as well as the date. Attach all correspondence with Bank staff, any notes, a map or diagram of the project area (if needed) and any other evidence which supports your request.

Contacting the Asian Development Bank Compliance Review Panel

Contact Information:

Secretary, Compliance Review Panel
Asian Development Bank
6 ADB Avenue, Mandaluyong City
1550 Metro Manila, Philippines
Tel: + 63 2 632 4149
Fax: + 63 2 636 2088
Email: crp@adb.org

Visit the [CRP website](#)



Project Documents:

- The ADB begins the project cycle by working with the country's government, local civil society organizations and the private sector to create a Country Partnership Strategy (CPS). After approval by the ADB's Board of Directors, these documents are made available to the public.
- During project preparation the ADB, along with the government, conducts a feasibility study of the project. At this stage, project information documents should be publicly available and can be accessed in the [ADB project database](#).
- After project preparation and examination, the ADB prepares a loan agreement with the borrower country. Following loan appraisal, negotiations take place with the borrower country and the loan is submitted to the Board of Directors for approval.
- Once the loan agreement is signed, funds are dispersed and the project moves into the implementation stage. After the completion of the project, an evaluation report is prepared to assess the implementation of the project, usually within 12-24 months after completion.
- Learn more about the ADB project cycle [here](#).

Gender at the ADB:

- The Regional and Sustainable Development Department is the center for gender issues at the ADB. This department provides assistance, and monitors and implements the gender policy in projects and programs.
- At the project level, this policy requires the Initial Poverty and Social Assessment (IPSA) to include gender, which is conducted during the preparation phase of the project cycle. The IPSA is publicly available upon completion.
- For gender-specific projects, a social development or gender specialist must prepare a Gender Action Plan (GAP).
- At the country level, this policy requires Country Strategy Programs (CSPs) to include a Country Gender Strategy to address gender concerns that have been identified in a Country Gender Assessment.
- Read the full text of the ADB's Operational Policy on Gender and Development [here](#).

Electronic Resources:

- Contact your [Executive Director](#).
- Find information about your [Country Office](#).
- Find more information about [projects](#) in your country.
- View the ADB's [Operational Manual](#) for information about policies and procedures.
- Find more information about the [procedures](#) and timeframe of the ADB Compliance Review Panel.
- Read past [annual reports](#) from the ADB's Compliance Review Panel.
- Find more information on [filing a complaint](#) at the ADB's Compliance Review Panel.
- View [Frequently Asked Questions](#) about the ADB's Compliance Review Panel.
- See a [sample request form](#) for filing a complaint to the ADB Compliance Review Panel, also presented below.

Sample Request Form to Submit for Investigation to the ADB Compliance Review Panel:

Adapted from the ADB Compliance Review Panel brochure.

Identify yourself and any other requestors and include your contact information (address, telephone, fax, email). If there is any representative, include their qualifications and why they were chosen to represent the people affected. *Optional:* You may request to keep your and the requestors identity confidential and must explain why.

We, [\[insert your name\]](#), live in and/or represent [\[insert community name\]](#) who live in [\[insert country, area, region\]](#).

Include the name of the ADB project, as well as the country and location.

The name of the project that has harmed us, or that will likely harm us is [\[insert project name\]](#), located in [\[country, area, region\]](#).

Explain how you think this project has, or will, directly and adversely affect the rights and interests of the people living in this community, particularly women and men.

This project has or will harm us in the following ways: [\[list potential or real negative effects of the project here and why they are so damaging\]](#).

Here, include any previous contact you have had with ADB staff. List any meeting dates and include any notes or exchanges along with your request.

We have previously spoken/met with [\[name of ADB staff member\]](#) and we discussed [\[content of your conversation\]](#). These exchanges have inadequately addressed our concerns because [\[explain how ADB staff member was not able to address your concerns\]](#). We therefore wish to take our complaint to the Compliance Review Panel.

List any policies or procedures (if known) which you think the ADB has violated as a result of this project, such as the ADB Operational Policy on Gender and Development.

We believe the ADB has failed to follow its operational procedures and guidelines, specifically [\[list policies here\]](#).

Explain why you think ADB should review this project. Include what you think should be the solution and how ADB should solve the situation.

We would like the ADB to remedy the harm done in the following way [\[include what you would like to see the ADB do to redress the harm to your community\]](#).

Include the signatures of those requesting the investigation as well as the date. You may attach any other relevant information, such as meeting notes, project diagrams or maps of the area.

Contacting the African Development Bank Independent Review Mechanism

Contact Information:

Compliance Review and Mediation Unit (CRMU)
PO Box 323-1002
10th Floor, EPI-C,
African Development Bank Group
Tunis-Belvedere, Tunisia
Tel: + 216 71 10 20 56
+ 216 71 10 29 56
Fax: + 216 71 10 37 27
Email: crmuinfor@afdb.org

Visit the [IRM website](#)



Project Documents:

- During the "Preparation" and "Appraisal" phases, staff and consultants prepare project feasibility studies which present information and data and outline the development plans and goals of the proposed project. These documents are not published.
- Next, loan negotiations take place between the AfDB and the country government. The Board of Directors then reviews the proposed project. If the Board approves the project, all project documents will be posted online and can be found in the [Project Portfolio database](#).
- Remember, you can submit a claim at any point of the project cycle or until 12 months after project completion or final disbursement of funds for the project. Learn more about the AfDB Project Cycle [here](#).

Gender Policy at the AfDB:

- Measures must be taken to ensure the full participation of women in decision-making, with attention to where and when women can meet, how meetings are organized, and how information is distributed.
- The Bank must assess and document the potential negative impacts of the project on women, considering impacts at all stages of the project cycle, and must ensure that women are not disproportionately impacted by the project.
- Measures must be taken to ensure that women and men benefit equally from the project.
- Measures should be taken to ensure that replacement land is registered in the name of women after resettlement.
- View the full text of the AfDB Gender Policy [here](#).

Electronic Resources:

- Contact your [Executive Director](#).
- Find information about your [Country Office](#).
- Find information on [projects](#) in your country.
- View the AfDB's [operational policies and procedures](#).
- Read about [past cases](#) taken to the AfDB Independent Review Mechanism.
- Find more information on the [procedures](#) of the AfDB Independent Review Mechanism.
- See more [information on filing a complaint](#) at the AfDB Independent Review Mechanism.

Sample Request Form to Submit for Investigation to the AfDB Independent Review Mechanism:

Adapted from the AfDB Independent Review Mechanism website.

Identify yourself and any other requestors and include your contact information (address, telephone, fax, email). If there is any representative, include proof of their qualifications and why they were chosen to represent the people affected.

We, [\[insert your name\]](#), live and/or represent [\[insert community name\]](#) who live in [\[insert country, area, region\]](#).

Include the name of the AfDB project, as well as the country and location.

The name of the project that has harmed us, or that will likely harm us is [\[project name\]](#), located in [\[country/area/region\]](#).

Explain how you think this project has, or will, directly and adversely affect the rights and interests of the people living in this community, particularly women and men.

This project has or will harm us in the following ways: [\[list potential or real negative effects of the project here and why they are so damaging\]](#).

Here, include any previous contact you have had with AfDB staff. List any meeting dates and include any notes or exchanges along with your request.

We have previously spoken/met with [\[name of AfDB staff member\]](#) and we discussed [\[content of your conversation\]](#). These exchanges have inadequately addressed our concerns because [\[explain how AfDB staff member was not able to address your concerns\]](#). We therefore wish to take our complaint to the CRMU-IRM.

List any policies, procedures, or operations you think the AfDB has violated as a result of this project, such as the AfDB Gender Policy.

We believe the AfDB has failed to follow its operational procedures and guidelines, specifically [\[list policies here\]](#).

Explain why you think the AfDB should review this project. Include what you think should be the solution and how the AfDB should solve the situation.

We would like the AfDB to remedy the harm done in the following way [\[include what you would like to see the AfDB do to redress the harm to your community\]](#).

Include the signatures of those requesting the investigation as well as the date. Attach all correspondence with Bank staff, any notes from meetings, maps or diagrams of the project area (if needed) and any other evidence which supports your request.

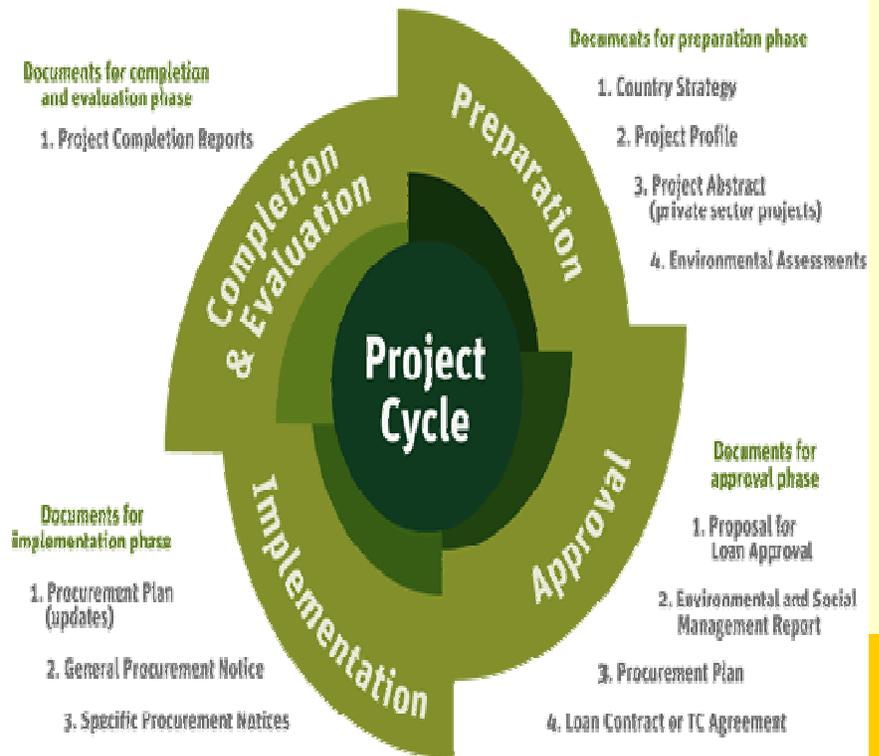
Contacting the Inter-American Development Bank Independent Consultation and Investigation Mechanism*

Contact Information:

Independent Consultation and Investigation Mechanism,
Inter-American Development Bank
Stop E-1205
1300 New York Ave NW
Washington, DC 20577
USA
Tel: +1 202 623 3952
Fax: + 1 202 312 4057
Email: mecanismo@iadb.org

Visit the [ICIM website](#)

* The IDB has recently updated its process and policies for accountability. Formerly called the Independent Investigation Mechanism, the Independent Consultation and Investigation Mechanism will take effect in May 2010.



Project Documents:

- During the Preparation and Approval stages, staff and consultants prepare project feasibility studies which present information and data and outline the development plans and goals of the proposed project. These documents are not published.
- Next, loan negotiations take place between the IDB and government. The Board of Directors then reviews the proposed project. If the Board approves the project, all project documents will be posted online and can be found in the [Project Portfolio database](#).
- You can submit a claim at any point of the project cycle or until 24 months of last financial disbursement. Learn more about the IDB Project Cycle [here](#).

Gender at the IDB:

The IDB is currently in the process of revising its 1987 Women in Development Policy. The latest draft version of the new Gender Policy includes some key plans to enhance gender equality, such as:

- In the planning stage, the Bank will require an analysis of gender issues in order to learn more about country priority concerns that affect gender equality.
- A gender analysis will also be required in all the Bank's financial operations. It will ensure that gender issues are considered at all stages of the project cycle, including the identification, design, implementation, monitoring, and evaluation stages.
- Specific guidelines will be prepared to apply the policy in Bank operations, to increase understanding of gender issues and establish criteria to determine the risk of negative impacts or exclusion for reasons of gender.
- The Bank will establish gender sensitive indicators to monitor project implementation, outcomes and effectiveness.
- Learn more about the IDB and gender [here](#).

Electronic Resources:

- Contact your [Executive Director](#).
- Find information about your [Country Office](#).
- Find information on [projects](#) in your country.
- View the IDB's [Operational Policies](#).
- Read about [past cases](#) taken to the IDB Independent Investigation Mechanism.
- Find more information on the [procedures](#) of the IDB Independent Consultation and Investigation Mechanism.
- Read past [annual reports](#) for the IDB Independent Investigation Mechanism.

Sample Request Form to Submit for Investigation to the IDB ICIM:

Adapted from the IDB ICIM website.

Include your name, address, telephone, fax and/or email of you and the other requestors. Include the name and address of any representative and proof of their qualifications. *Optional:* You may request to keep your and the requestors identity confidential.

We [\[insert your name\]](#) live in and/or represent others who live in [\[insert area/region/country\]](#). Please find our contact information attached.

Include the name of the IDB project, as well as the country and location.

The name of the project that has harmed us, or will likely harm us is, [\[insert project name\]](#), located in [\[country, area, region\]](#).

Explain how you think this project has, or will, directly and adversely affect the rights and interests of the people living in this community, particularly women and men.

The project has or will harm us in the following ways: [\[list potential or real negative effects of the project here and why they are so damaging\]](#).

Here, include any previous contact you have had with IDB staff. List any meeting dates and include any notes or exchanges along with your request.

We have communicated with Bank staff on the following occasions [\[list dates and names of IDB staff\]](#) and you may find our notes attached. The Bank response was inadequate: [\[include description of Bank response and why it was inadequate\]](#). We remain unsatisfied for the following reasons: [\[include list of reasons and why\]](#).

List any policies or procedures if known which you think the IDB has violated as a result of this project, such as the IDB Gender Policy.

We believe the IDB has failed to follow its operational procedures and guidelines, specifically [\[state policies here\]](#).

Request that the Executive Directors of the IDB authorize an investigation of this matter under the ICIM. Include what you think should be the solution and how the IDB should solve the situation.

We request that the Executive Directors of the IDB recommend an investigation of [\[project name\]](#) under the ICIM. We would like the IDB to remedy the harm done in the following way [\[include what you would like to see the IDB do to redress the harm to your community\]](#).

Include the signatures of those requesting the investigation and the date. You may include any other relevant information for your request, such as a map or diagram of the project area or meeting notes.

Contacting the IFC Compliance Advisor/Ombudsman

Contact Information:

Office of the Compliance Advisor/Ombudsman (CAO)
2121 Pennsylvania Avenue, NW
Washington, DC 20433, USA
Tel: + 1 202 458 1973
Fax: + 1 202 522 7400
Email: cao-compliance@ifc.org
Visit the [CAO website](#)



Project Documents:

- After an application has been received for financing, the IFC will review the application closely and possibly request a feasibility study before moving on to the Project Appraisal phase.
- During Project Appraisal, the project will be examined for technical, environmental, financial and economic impacts by an appraisal team. This team consists of an investment officer with knowledge of the country, an engineer with relevant expertise and an environmental specialist. Any outstanding issues from the participating governments are negotiated during this phase. The public is then notified of the project after this stage.
- At this point, the Board of Directors will make its decision on whether or not to approve the Project. If they approve, resources are then gathered, contracts signed and funds will be dispersed to start the project.
- Remember, you may submit a claim at any point in the project cycle. Learn more about the IFC project cycle [here](#).
- Search the [IFC project database](#).

Gender at the IFC:

- As a member of the World Bank Group, the IFC does uphold OP 4.20. Learn more about the IFC and gender [here](#).
- The IFC has two initiatives concerning gender: Gender Entrepreneurship Markets (GEM) and Private Sector Development-Gender (PSD-Gender). These are not policies or strategies and do not provide guidelines for staff to follow.
- GEM provides on-line tools, technical assistance and access to IFC finance, research and training for women entrepreneurs. It publishes a Global Directory of Women's Business Associations and a Quarterly Newsletter.
- PSD-Gender supports initiatives for women entrepreneurs and partners with the World Bank to promote gender considerations in private sector development.
- Additionally, the IFC participates in the World Bank 2006 Gender Action Plan (GAP).
- The IFC's primary focus in GEM, PSD-Gender and GAP is promoting women's participation in private sector development.

Electronic Resources:

- Contact your [Executive Director](#).
- Find your representative on the [Board of Directors](#).
- Find more information about your [Country Office](#).
- Find information on [projects](#) in your country.
- Find more information on the [procedures](#) of the IFC Compliance Advisor/Ombudsman.
- Learn about [past cases](#) from taken to the IFC Compliance Advisor/Ombudsman.
- Read past [annual reports](#) from the IFC's Compliance Advisor/Ombudsman.
- Find more [resources](#) on filing a complaint at the IFC's Compliance Advisor/Ombudsman.
- See a [sample request form](#) for filing a complaint at the IFC's Compliance Advisor/Ombudsman, also presented below.

Sample Request Form to Submit for Investigation to the IFC Compliance Advisor/Ombudsman

Adapted from the IFC Compliance Advisor/Ombudsman brochure.

Identify yourself and any other requestors and include your contact information (address, telephone, fax, email). If there is any representative, include their qualifications and why they were chosen to represent the people affected.

Optional: You may request to keep your and the requestors identity confidential and must explain why.

We, [\[insert your name\]](#), live and/or represent [\[insert community name\]](#) who live in [\[insert country, area, region\]](#).

Include the name of the IFC project, as well as the country and location.

The name of the project that has harmed us, or that will likely harm us is [\[insert project name\]](#), located in [\[country, area, region\]](#).

Explain how you think this project has, or will, directly and adversely affect the rights and interests of the people living in this community, particularly women and men.

This project has or will harm us in the following ways: [\[list potential or real negative effects of the project here and why they are so damaging\]](#).

Here, include any previous contact you have had with IFC staff. List any meeting dates and include any notes or exchanges along with your request.

We have previously spoken/met with [\[name of IFC staff member\]](#) and we discussed [\[content of your conversation\]](#). These exchanges have inadequately addressed our concerns because [\[explain how IFC staff member was not able to address your concerns\]](#). We therefore wish to take our complaint to the CAO.

List any policies or operations (if known) which you think the IFC has violated as a result of this project, such as the Gender Policy (OP 4.20).

We believe the IFC has failed to follow its operational procedures and guidelines, specifically [\[list policies here\]](#).

Explain why you think IFC should review this project. Include what you think should be the solution and how the IFC should solve the situation.

We would like the IFC to remedy the harm done in the following way [\[include what you would like to see the IFC do to redress the harm to your community\]](#).

Include the signatures of those requesting the investigation as well as the date. You may attach any other relevant information, such as meeting notes, project diagrams or maps of the area.

Contacting the EBRD Project Complaint Mechanism

Contact Information:

PCM Officer
European Bank for Reconstruction and Development
One Exchange Square
London EC2A 2JN
United Kingdom

Fax: + 44 207 338 7633

Email: pcm@ebrd.com

Visit the [PCM website](#)



Project Documents:

- After gathering initial information, the project will be subject to three different types of reviews: Concept, Final and Board. After the Board Review, the project is officially recognized by the EBRD and presented for signing.
- After the signing of the contracts, funds between your government and the EBRD are allocated and the project implementation begins.
- You can submit a claim at any point during the project cycle or until 12 months after the completion of a project or last disbursement of funds. If the project has yet to be approved or does not require approval from the Board of Directors, the Bank must have given a clear indication that the project is under consideration. Learn more about the EBRD Project Cycle [here](#).
- Search the EBRD project database [here](#).

Gender Action at the EBRD:

- The Environmental and Sustainability Department (ESD) should be involved to ensure effective mitigation of gender impacts associated with projects by enforcing gender equality safeguards applicable to labor standards, resettlement, indigenous and vulnerable people as well as public health and safety. For more information, see EBRD's [Environmental and Social Policy \(2008\)](#).
- ESD requires that tools and guidance should be revised so as to include a specific focus on adverse gender impacts and gender discrimination – amongst both the workforce and affected communities.
- Measurement and monitoring tools must be used to assess the impact of investment and technical cooperation projects on gender equality and women's empowerment, including gender sensitive indicators.
- Data (including sex-disaggregated data) must be collected concerning women's economic participation and the relationships among gender equality, women's empowerment, growth and poverty reduction. This data must be publicly available.
- See the full version of the EBRD's Gender Action Plan [here](#).

Electronic Resources:

- Contact your [Country Office](#).
- Find information about [projects](#) in your country.
- Find more information on the [procedures](#) of the EBRD Project Complaint Mechanism.
- See [past cases](#) taken to the EBRD's Project Complaint Mechanism, and [past cases](#) taken to the previous Independent Recourse Mechanism.
- Find more information on [how to submit your complaint](#) to the EBRD Project Complaint Mechanism.
- See a [sample request form](#) for filing a complaint at the EBRD's Project Complaint Mechanism, also presented below.

Sample Request Form to Submit for Investigation to the EBRD Project Complaint Mechanism:

Adapted from the EBRD Project Complaint Mechanism brochure.

Identify yourself and any other requestors and include your contact information (address, telephone, fax, email). If there is any representative, include their qualifications and why they were chosen to represent the people affected. *Optional:* You may request to keep your and the requestors identity confidential.

We, [\[insert your name\]](#), live and/or represent [\[insert community name\]](#) who live in [\[insert country, area, region\]](#).

Include the name of the EBRD project, as well as the country and location.

The name of the project that has harmed us, or that will likely harm us is [\[project name\]](#), located in [\[country/area/region\]](#).

Explain how you think this project has, or will, directly and adversely affect the rights and interests of the people living in this community, particularly women and men.

This project has or will harm us in the following ways: [\[list potential or real negative effects of the project here and why they are so damaging\]](#).

Here, include any previous contact you have had with EBRD staff. List any meeting dates and include any notes or exchanges along with your request.

We have previously spoken/met with [\[name of EBRD staff\]](#) and we discussed [\[content of your conversation\]](#). These exchanges have inadequately addressed our concerns because [\[explain how EBRD staff member was not able to address your concerns\]](#). We therefore wish to take our complaint to the IRM.

List any policies or procedures (if known) which you think the EBRD has violated as a result of this project, such as the EBRD Gender Action Plan.

We believe the EBRD has failed to follow its operational procedures and guidelines, specifically [\[list policies here\]](#).

Explain why you think the EBRD should review this project. Include what you think should be the solution and how EBRD should solve the situation.

We would like the EBRD to remedy the harm done in the following way [\[include what you would like to see the EBRD do to redress the harm to your community\]](#).

Include the signatures of those requesting the investigation as well as the date. Attach all correspondence with Bank staff, any notes, maps or diagrams of the project area (if needed) and any other evidence which supports your request.



Part III: Case Studies

Part III of this guide presents three case studies intended to help you and local communities identify situations in which project design and application violate gender-related policies. This section illustrates real situations in which women in particular suffered from project activities that violated IFI policies. The following case studies involve real IFI projects and describe the types of activities that can be reported to IFI accountability mechanisms.¹⁰

Case Study 1- In 2003, the International Finance Corporation (IFC) and European Bank for Reconstruction and Development (EBRD) financed The Baku-Tbilisi-Ceyhan (BTC) Oil Pipeline Project, a 1,760km pipeline construction project to transport oil across Eastern Europe. The BTC Project was reviewed by the accountability mechanism of the IFC (which is part of the World Bank Group) for complaints that are not related to gender. In our case study, we identify project impacts that violate gender-related policies of the IFC that should have been a part of the complaint.

Case Study 2- Funded by the Asian Development Bank (ADB), the Sri Lanka Southern Transport Development Project (STDP) involves the construction of a 126km highway. In 2004, Sri Lankans took a complaint about the STDP to the ADB Compliance Review Panel, which concluded that the project was not in agreement with ADB policies on involuntary resettlement, the environment and gender. Our case study describes the types of project activities that violated ADB gender-related policies.

Case Study 3- The Bujagali Hydroelectric Project involves an ongoing dam project in Uganda funded by the World Bank and African Development Bank (AfDB). This project has been reviewed by both the World Bank Inspection Panel and the Independent Review Mechanism (IRM) of the AfDB. Our case study focuses on the claim registered at the IRM. Although specific gender-related concerns were not included in the claim, the IRM review report concluded that the project violated AfDB gender-related policies.

¹⁰ Due to lack of resources, we were unable to collect on-the-ground information on active projects to evaluate gender-related impacts on communities. We therefore used actual claims that have already been reviewed by IFI accountability mechanisms to show potential or actual gender impacts of three IFI projects that appear to violate IFI gender-related policies.

We present it here to illustrate how the project design, particularly consultation, participation and compensation issues, violated AfDB gender-related policies.

This small sample of case studies demonstrate various IFI project gender issues for citizen groups to critically review to help decide whether to launch a complaint before accountability mechanisms.

Case Study 1: The Baku-Tbilisi-Ceyhan (BTC)

Oil Pipeline Project (2003-2009)

Total Project Cost: USD 3.6 billion **Sector:** Extractive Industry

IFI Funders: International Finance Corporation (IFC) and European Bank for Reconstruction and Development (EBRD)

Region: Eastern Europe

Project Description: The BTC pipeline project was developed by an international group of 11 partners, led by British Petroleum, to transport crude oil from the Caspian Sea to the Mediterranean Sea through construction of a 1,760 km pipeline across Azerbaijan, Georgia and Turkey.

Gender-related policies and Standards of the IFC and EBRD:

- The *IFC Policy on Social and Environmental Sustainability* requires the IFC to make sure that its clients meet certain *Performance Standards*. *Performance Standard 1* requires clients to: a) determine if individuals or groups, because of their gender, may be “differentially” or “disproportionately” affected by the project; and b) propose and implement different measures to mitigate negative impacts, so they do not fall mainly on disproportionately affected individuals or groups.
- The EBRD released its first *Gender Action Plan* in 2008 which includes gender mainstreaming requirements, and mandates development of measurement and monitoring tools to assess the impact of projects on gender equality and women’s empowerment.

How This Project Violates the Above Standards Relating to Gender¹¹:

- Women in the affected communities were not adequately consulted during the project preparation and project implementation phases. Although local women's organizations participated in the six IFC/EBRD multi-stakeholder forums, women in affected communities were poorly represented.
- The project has resulted in increased sex work, sexual harassment and trafficking of women along the pipeline. Increased sex work and sexual harassment of women were linked to demand created by an expanded number of male domestic and foreign migrant construction workers who had left their families to work on this project. Women are often also trafficked to meet the increased demand for sex workers.
- The project has increased the amount of disease, particularly sexually transmitted diseases, in the region. Identified health problems include augmented rates of maternal and child mortality, anemia among children and women, stillbirths, abortion and STD/HIV cases.¹² The rise in disease and stillbirths in the BTC-impacted communities is attributed to air pollution and radiation from project activities.
- The project has worsened socio-economic conditions of local communities, especially for women farmers, whose land was appropriated by the pipelines. The pipelines decreased women's access to natural resources, infrastructure and employment.¹³

Accountability Mechanisms Available:

- *The Office of the Compliance Advisor/Ombudsman (CAO)* – at the IFC.
- *Independent Recourse Mechanism (IRM)* – at the EBRD.
- See step-by-step complaint processes in the Resource Pages.

¹¹ The gender-related concerns presented here are based on Gender Action's and CEE Bankwatch's fieldwork evaluation of the BTC project. See *Boom Time Blues: Big Oil's gender impacts in Azerbaijan, Georgia and Sakhalin (2006)*. Available at www.genderaction.org/images/boomtimeblues.pdf

¹² Increased violence and prostitution also elevated the rates of STDs and HIV infections in the region.

¹³ Gender Action and CEE Bankwatch found that the employment opportunities on the BTC pipeline were scarce for women, with most having short-term contracts, lack of transparency in recruiting and hiring, and firings that occurred without clear explanation. See *Boom Time Blues: Big Oil's gender impacts in Azerbaijan, Georgia and Sakhalin (2006)*. Available at www.genderaction.org/images/boomtimeblues.pdf

Case Study 2: The Southern Transport Development Project

Sri Lanka (1999-2009)

Total Project Cost: USD 90 million **Sector:** Infrastructure/Transport

IFI Funder: Asian Development Bank

Region: Asia

Project Description: The Southern Transport Development Project (STDP) is an ADB-funded infrastructure investment in Sri Lanka, which involves the construction of a new 126 km highway linking Kottawa in the suburbs of Colombo to Godagama Matara in the Southern Province of Sri Lanka. The project aims to reduce poverty and promote social and economic development in Sri Lanka's Southern region.

Gender-related Standards ADB Must Meet:

- The *ADB Policy on Gender and Development* requires a gender analysis of proposed projects and consideration of gender issues at all project cycle stages. These stages include identification, preparation, appraisal, implementation and evaluation.¹⁴
- The *ADB Operations Manual Bank Policies* specifically mentions the ADB's commitment to ensure that gender concerns are addressed in all projects, including those in the infrastructure sector.¹⁵
- The *ADB Operations Manual Operations Procedures* requires a detailed gender analysis, as an essential component of the Initial Poverty and Social Assessment, for projects that are likely to have substantial gender impacts.¹⁶

How This Project Violates the Above Standards Relating to Gender¹⁷:

- Although the project had significant negative impacts on women, a gender analysis was not done to efficiently assess the impacts of the project on men and women.

¹⁴ ADB Policy on Gender and Development (1998). Available at: <http://www.adb.org/Gender/policy-gad.asp>

¹⁵ OM Section C2/BP (2006a). Available at: www.adb.org/Documents/Manuals/Operations/OMC02-25Sep06.pdf

¹⁶ OM Section C2/OP (2006b). Available at: www.adb.org/Documents/Manuals/Operations/OMC02-25Sep06.pdf

See Paragraph 6, 33 and 34 of ADB Involuntary Resettlement Policy (1995). Available at:

www.adb.org/documents/policies/involuntary_resettlement/default.asp

Paragraph 30 of ADB Environment Policy (2002). Available at:

www.adb.org/documents/policies/environment/default.asp?p=policies

¹⁷ The gender-related impacts presented here are based on a list of project updates compiled by the Bank Information Center (BIC) which is available at: <http://www.bicusa.org/en/Project.37.aspx>. ADB Project Documents available at:

<http://www.adb.org/Projects/STDP/> and the ADB Compliance Review Panel webpage:

<http://lnadbq4.adb.org/dir0035p.nsf?Open>

People living in the affected community have been materially and adversely affected by the project as a result of the STDP being built through their community. Impacts have included loss of homes, land and livelihood without compensation. Women own more than one-third of the affected land and houses. Land and home loss created and worsened social and economic hardships, especially for vulnerable populations, such as female heads of households.

- The ADB's required environmental and social assessments were never conducted. This resulted in environmental damage to productive wetlands, leaving farmers, especially female farmers, landless and unemployed. Replacement agricultural land has not been provided to the majority of the farmers. During 2000 to 2002, about 20 percent of the farm workers had already lost agricultural land to the project. Many women were among those most affected because they worked as laborers on the plantations.
- The project led to forced resettlement which lacked a gender-sensitive component. In some instances, communities have been forced onto lands without water, toilet facilities or electricity. Forced resettlement has caused the suffering of many people, particularly women, the disabled, and the elderly.
- The involuntary resettlement and its implied population displacement, forced family members to live away from each other. This disruption of social and family networks increased women's household responsibilities, such as caring for children, the sick and the elderly.

Accountability Mechanisms Available:

The ADB accountability mechanism has two phases. The first phase involves less formal consultations with a *Special Project Facilitator (SPF)*. The second phase is more formal, and involves meetings with a *Compliance Review Panel (CRP)*. Two or more persons, who are nationals of the borrower country, or foreigners recognized as local representatives (or when local representation is not available, a non-local representative), may bring claims to the ADB accountability mechanism if they show that their rights and interests are directly, materially and negatively affected by an ADB proposed or funded project. See step-by-step complaint processes in the Resource Pages.

Case Study 3: The Bujagali Hydroelectric Project

Uganda (2007-2010)

Total Project Cost: USD 750 million **Sector:** Energy

IFI Funders: African Development Bank and World Bank

Region: Africa

Project Description: The Bujagali Hydroelectric project is funded by the World Bank and AfDB. The project is constructing a power plant at the Bujagali Falls on the Nile River in Uganda. The construction involves three large scale construction projects: i) a quarry to produce the necessary aggregate and rock fill material for a dam; ii) a mixing plant for the on-site production of concrete; and iii) a coffer to divert water during the construction of the permanent dam. The undertaking is expected to help Uganda produce least-cost power for domestic use and for export to neighboring countries.

Gender-related Standards AfDB Must Meet:

- *Paragraph 5.4* of the *Gender Policy* requires Bank staff to incorporate a gender analysis and gender considerations into all Bank operations.
- *Paragraph 3.3(b)* of the *Resettlement Policy* requires Bank staff to make available information about the proposed project, and the resettlement and rehabilitation plans, to both local people and national civil society organizations in “a timely manner and in a form and manner that is appropriate and understandable to local people”, with attention paid to levels of literacy and networking, which “may differ along gender lines”.¹⁸
- *Paragraph 3.3(b)* of the *Resettlement Policy* requires Bank staff to give careful attention to the organization of meetings, including the possibility of holding separate women’s meetings and ensuring the fair representation of female heads of households.
- *Paragraph 3.3(c)* of the *Resettlement Policy* requires Bank staff to pay particular attention to the needs of disadvantaged groups, which it defines to include “those below the poverty line, the landless, the elderly, women and children, and ethnic, religious and linguistic minorities; including those without legal title to assets, and female headed households.”

¹⁸ Involuntary Resettlement Policy (2003). Available at: <http://www.afdb.org/fileadmin/uploads/afdb/Documents/Policy-Documents/10000009-EN-BANK-GROUP-INVOLUNTARY-RESETTLEMENT-POLICY.PDF>

- The *Operations Manual (OM)*, states in *Paragraph 7* that, “The appraisal team should pay particular attention to issues related to poverty, gender, population and participation”.¹⁹
- AfDB policies also require that the project sponsor ensures “meaningful consultations with stakeholders and affected communities.”²⁰ According to the *Good Governance Policy Paragraph 6.30*, “Particular attention will be given to expanding participation in project design, implementation and evaluation to include women and most importantly to groups that represent them credibly”. *Paragraph 7* of the *OM* states that “The appraisal team should pay particular attention to issues related to ... participation”. The *Gender Policy* stipulates in *Paragraph 6.1.9* that, “Since women’s viewpoints may not always be adequately taken into account, Bank program/project missions will ... take special measures to ensure women’s full participation in these processes.”

How This Project Violates the Above Standards Relating to Gender:²¹

- According to the Compliance Panel calculations, the AfDB and World Bank Bujagali projects will displace an estimated 13,760 individuals (3,190 households), causing them to lose some of their assets. Of this group, 953 individuals (205 households) will be physically displaced, losing their homes.²²
- The IRM Panel Report concluded that “the perfunctory references to the gender dimensions of this project in the Bank documents constitute non-compliance with the requirements of the *OM* and the *Policy on Gender*”.²³ The Panel also concluded that “the lack of available data raises questions about the ability of Bank staff to comply with *Paragraph 5.4* of the *Gender Policy* which requires staff to incorporate gender analysis and gender considerations into all Bank operations”. While it appears that some attention was paid to gender issues—for example efforts were made to pay compensation in a way that protected the interests of both husbands and wives—it does not appear that there was adequate consultation with affected women or that all their concerns were adequately addressed in the resettlement and compensation plans. Based on this finding, the Panel concluded that the Bank failed to comply with the *Gender Policy*.

¹⁹ OM600. Available at: www.afdb.org/pls/portal/url/ITEM/5CBFDA86F41A8483E040C00A0C3D6A47

²⁰ See Paragraph 3.3(a) of the Involuntary Resettlement Policy and Paragraph 5.3 and 28 of the Environmental Procedures for Private Sector. Available at: <http://www.afdb.org/fileadmin/uploads/afdb/Documents/Policy-Documents/ESAP%20pour%20Prive%20Secteur%20Operation.pdf>

²¹ The claim registered to the IRM did not include gender impacts. However, our analysis is based on the IRM Compliance Review Report which found the project in violation with the 2001 AfDB Gender Policy. The Request for Compliance Review and the Compliance Review Report are available at: http://www.afdb.org/portal/page?_pageid=473,19836287&_dad=portal&_schema=PORTAL

²² Based on the IRM Report.

²³ Ibid.

- The affected community claims that the resettlement process is incomplete and that there are still outstanding issues, including the loss of livelihoods, under-compensation, inability to obtain secure land titles and lack of adequate consultation.²⁴ The community also raises specific issues related to compensation for the people moved to the Naminya resettlement site. These issues include the poor quality of the houses received, lack of title deeds to land given as compensation, and unfulfilled promises to provide the community with a primary school, community center, health clinic, a road connecting the community to the main road, a market, and employment and income generating opportunities.
- The affected community acknowledged that the project sponsors did engage in consultation with them. However, they argued that consultation was inadequate as they were not offered true participation in the decision-making process.²⁵ Despite AfDB's required consultation standards, the Independent Review Mechanism (IRM) concluded that it is not clear that this lack of consultation amounted to an event of non-compliance.²⁶

Accountability Mechanisms Available:

- In 2004, the AfDB established the IRM. This mechanism includes both compliance review and problem solving functions. While the mechanism can review compliance of all operational policies and procedures for public-sector projects, it can only undertake compliance reviews of social and environmental policies for private-sector projects.
- See step-by-step complaint processes in Resource Pages.

²⁴ See the Compliance Review Report. Available at: <http://www.afdb.org/fileadmin/uploads/afdb/Documents/Compliance-Review/30740990-EN-BUJAGALI-FINAL-REPORT-17-06-08.PDF>

²⁵ Ibid.

²⁶ The Panel was of the opinion that, "While it is not clear that this lack of consultation amounts to an event of non-compliance, particularly given that it is clear that the sponsors of the project made considerable effort to consult with project stakeholders, the Panel is concerned about the Bank Management's failure to include an assessment of the adequacy of the consultation undertaken in the case of both the BHP and the BIP in the project appraisal reports. It is also concerned that some project affected groups seemed to know very little about the Bank's consultation requirements".

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