



Accountability in action or inaction?

An Empirical Study of Remedy Delivery in IAMs

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Executive Summary

Over the past three decades, Independent Accountability Mechanisms (IAMs) have become central to the promise of accountability within development finance. Designed to provide communities harmed by bank-financed projects with access to justice, IAMs have now handled over 2,000 complaints globally. Yet until now, there has been no comprehensive, system-wide analysis of whether and how often these mechanism processes deliver meaningful remedy, defined by tangible, material outcomes that repair harm and improve lives.

This report fills that gap. Through a mixed-methods approach, we analyzed all 2,270 complaints filed to 16 IAMs through 2022, identifying commitments made by development banks or their clients in response to community grievances. We paired this quantitative review with 45 in-depth interviews across 25 complaints globally, centering the lived experiences of community members and civil society actors engaged in IAM processes. Together, these methods allowed us to assess not just the frequency of remedy, but its quality, credibility, and impact as experienced on the ground.

Our findings reveal both possibility and failure. IAMs are capable of facilitating creative, responsive, and sometimes transformative forms of remedy, ranging from cash compensation to policy reform, land restitution, infrastructure investments, and more. These outcomes, when they occur, are often directly aligned with community-defined visions of justice and redress. However, such successes are the exception rather than the norm. Only 15% of closed complaints led to any identifiable commitment, and 10% saw those commitments completed. Even among eligible complaints, where the prevalence of commitments is higher (46%), most outcomes fell short of repairing the full scope of harm. Many communities found themselves navigating slow, opaque, and deeply unequal processes, often facing retaliation, limited access to information, and exclusion from decision-making structures. Implementation failures were particularly acute. Hard-fought commitments were routinely delayed, diluted, or canceled outright, with IAMs lacking the mandate, resources, or leverage to ensure follow-through. Monitoring efforts were often passive, short-lived, or reliant on parties responsible for the harm in the first place. And while many IAMs track procedural progress, none systematically or transparently report on outcomes, a critical gap that undermines both learning and accountability.

Our analysis of 2,270 complaints across 16 Independent Accountability Mechanisms (IAMs) reveals a persistent gap between the promise of remedy and its realization. While IAMs have demonstrated the ability to produce creative, community-centered solutions, these successes are rare and unevenly distributed. Key findings include:

- **IAMs can deliver meaningful remedy, but successes are limited.** Only 46% of all eligible complaints resulted in any identifiable commitments, and only 31% of eligible complaints reported completion of any commitments.
- **The scale of remedy is dwarfed by the scale of harm.** Even when commitments exist, they often address only a fraction of the damage experienced by affected communities.
- **Implementation remains a critical bottleneck.** Commitments are frequently delayed, inadequately monitored, partially fulfilled, or canceled altogether — eroding community trust and undermining accountability.
- **Communities face significant structural barriers.** Power imbalances, retaliation risks, inaccessible information, language barriers, and financial constraints make meaningful participation difficult without civil society support.
- **IAM reporting focuses on process, not outcomes.** Most IAMs track procedural milestones but fail to publicly report on whether commitments are delivered or harms are remedied, obscuring systemic gaps.

Despite these shortcomings, the report also highlights key levers for change. Civil society organizations have played an indispensable role in supporting communities through the IAM process, significantly increasing the likelihood of both commitments and implementation. Some IAMs have piloted promising practices, such as participatory monitoring, sustained engagement, and creative enforcement tools, that demonstrate the path forward. Remedy, we argue, must be reimagined not as a peripheral concern but as a core responsibility of development institutions. It must be adequately resourced, independently monitored, and centered around the needs and voices of affected people.

To address these systemic shortcomings and reorient IAMs toward outcomes that center community-defined visions of justice, we recommend that development banks and IAMs:

- **Develop a Remedy Framework:** Establish institution-wide standards ensuring that remedy is timely, adequate, and tailored to the needs of affected communities.
- **Empower IAMs with Mandates and Resources:** Equip mechanisms with the independence, staffing, and authority to monitor, enforce, and escalate when commitments stall.

- **Center Communities in Implementation and Monitoring:** Make monitoring participatory, ensuring communities have a voice in designing, tracking, and verifying commitments.
- **Enforce Consequences for Non-Implementation:** Require banks and clients to fulfill commitments, with clear penalties for delays, cancellations, or incomplete remedies.
- **Improve Transparency and Data Reporting:** Systematically track and publish outcomes across all complaints to evaluate effectiveness and strengthen institutional learning.

Ultimately, this report calls on development banks and their accountability mechanisms to make remedy a foundational element of responsible finance. This means adopting institutional frameworks that prioritize redress, ensuring IAMs are empowered to oversee and enforce commitments, and incorporating the outcomes of IAM processes into project evaluations and institutional learning. It also means addressing the profound structural imbalances — legal, cultural, linguistic, economic — that too often prevent communities from accessing the justice they are owed. Remedy is not just a moral imperative. It is a precondition for credible accountability, and a litmus test for whether development can truly claim to be inclusive, just, and rights-based.

A community of women engaged in fish drying in Khelkom (Sendou). In 2016, communities including these women filed a complaint to the FMO Independent Complaints Mechanism and African Development Bank Independent Recourse Mechanism expressing concerns about the siting of a 125 MW coal-fired power plant near the fishing community, pollution from the plant impacting their health and livelihoods, and lack of compensation for the loss of land.





Introduction

For decades, development banks have spent trillions of dollars to address some of the world's most pressing problems: poverty, disease, gender inequality, and more recently, climate change. Many have debated the efficacy of this system but, regardless of its purported benefits, any project also carries the risk of significantly impacting the communities in which they are situated. Projects often intersect with the land, the environment and the people in manifold ways that are difficult to foresee and sometimes never fully anticipated, particularly if the project fails at the outset to conduct proper consultation and due diligence. Safeguard policies aim to prevent, mitigate, and compensate for these costs, but even so, harm remains all too common. When it does occur, communities' access to their right to remedy can be inaccessibly rare.¹

Since the early 1990s, development banks have attempted to address and mitigate some of this harm through Independent Accountability Mechanisms (IAMs), non-judicial grievance mechanisms designed to provide a direct avenue for impacted communities to raise grievances, engage with project implementers, and receive remedy for harm they have experienced.² Thirty years later, what has this system accomplished? Over 2,000 complaints have been filed to IAMs tied to international financial institutions (IFIs), but few appear to have successfully navigated through the long and complex complaint process. Completing the process is also no guarantee of remedy, either promised or delivered.

As of yet, there appears to be no systematic analysis of the prevalence, scope, and efficacy of the remedy from IAM complaints, the understanding of which is crucial for assessing whether and to what extent the ecosystem that has accrued around IAMs over these intervening decades is producing its intended impact.³ This report and the research behind it were inspired by a desire to understand on a more systemic level whether the independent accountability mechanism ecosystem is delivering **meaningful outcomes**, both for communities harmed by projects and for financial institutions that should be learning from past mistakes to prevent and mitigate future harm.

1. Bretton Woods Project, <https://www.brettonwoodsproject.org/2019/06/what-are-the-main-criticisms-of-the-world-bank-and-the-imf/> SECTION 3.2.

2. IAMs were technically founded more for institutional learning than the provision of remedy, but their scope and mandate has evolved significantly in the intervening years to be more community oriented.

3. See <https://www.ohchr.org/sites/default/files/2022-02/Remedy-in-Development.pdf>.

Terminology

Outputs and Outcomes

Data on complaints has historically only considered **outputs**, formal end products of IAM processes which include mediated agreements and compliance review reports. This report aims to extend that analysis to also include **outcomes**, which broadly refer to material consequences from these processes, including findings of non-compliance, IAM recommendations, and most importantly, the commitments made by the bank or its partners resulting from agreements or management action plans.

It is important to note that while every eligible complaint should presumably have a formal output, outcomes would generally only be expected in complaints where non-compliance has been found, or where project implementers agree during mediation that action needs to be taken to address community concerns. This will not be the case for every eligible complaint, but based on data analysis and anecdotal evidence, tangible outcomes should be produced in the vast majority of eligible complaints. They are not.

Commitments and Remedy

Several different terms are used by IAMs to refer to the community-facing outcomes that can be expected of them, including “recourse”, “redress”, “remedy”, and others. Their meanings are often not clearly defined and legal counsel are careful to avoid terms they believe might create liability for the Banks.

For the purposes of this report, **remedy** simply refers to whatever the community believes is necessary to repair the harm that has been done to them as a result of a financed project. Given the range of projects and the harm experienced by communities, as well as the different perspectives that each community holds, this definition is purposefully meant to be flexible enough to account for all of those variations. The specific modality of remedy tracked in this report is **commitments**, defined as explicit promises to take corrective, remedial, or preventive actions made by either the development finance institution (DFI) or the project client.

Table 1: Distinguishing Outputs and Outcomes of IAM processes

	Outputs	Outcomes
Definition	Formal end products of IAM processes	Material consequences from IAM processes
Examples	— Dispute Resolution agreements — Compliance reports	— Findings of non-compliance — IAM recommendations — Commitments implemented by banks or their partners — such as changes to projects, compensation, or other actions to repair harm
Prevalence	Expected result of every eligible complaint	Expected only if non-compliance is found or actions are agreed upon
Visibility and measurement	Should be publicly recorded and published documents, except for reporting errors and confidential agreements	Sometimes public, but often embedded in follow-up actions or bank management responses. Rarely or inconsistently tracked across mechanisms
Significance to communities	Represents procedural closure and process completion	Represents the potential for remedy or improvements for affected communities — signals that harm is being acknowledged and addressed

Methodology

This research employed a mixed-methods approach that combined a systematic quantitative review of all complaints filed to Independent Accountability Mechanisms (IAMs) through 2022, along with a robust qualitative inquiry into the nature and implementation of commitments made through those mechanisms.⁴ Together, these methods aimed to assess both the prevalence and the lived experience of remedy as facilitated through IAM processes.

Quantitative Analysis of Commitments

The quantitative component of the study involved the comprehensive review of all 2,270 complaints submitted to IAMs linked to international financial institutions through 2022. From this dataset, we extracted and coded any identifiable commitments, drawn from official publicly available documentation including compliance review investigation reports, management action plans, dispute resolution agreements, and other public IAM-generated outputs

Each commitment was categorized into broad thematic areas such as livelihood restoration, community satisfaction, and compensation, and further subcategorized into finer-grained classifications such as free, prior, and informed consent (FPIC), apologies, and land restitution. This typology allowed for both descriptive statistics on commitment types and inferential analysis exploring patterns across project sectors, geographic regions, complaint eligibility status, and other variables. By identifying where and how commitments emerged, we were able to quantify not only the frequency of such outcomes but also begin to assess the systemic factors associated with their presence or absence.

The categories in Table 2 are derived from the larger commitment typology used to code identifiable commitments across the 2,270 complaints. A full list of commitment subcategories and definitions used in this research is available in Appendix C.

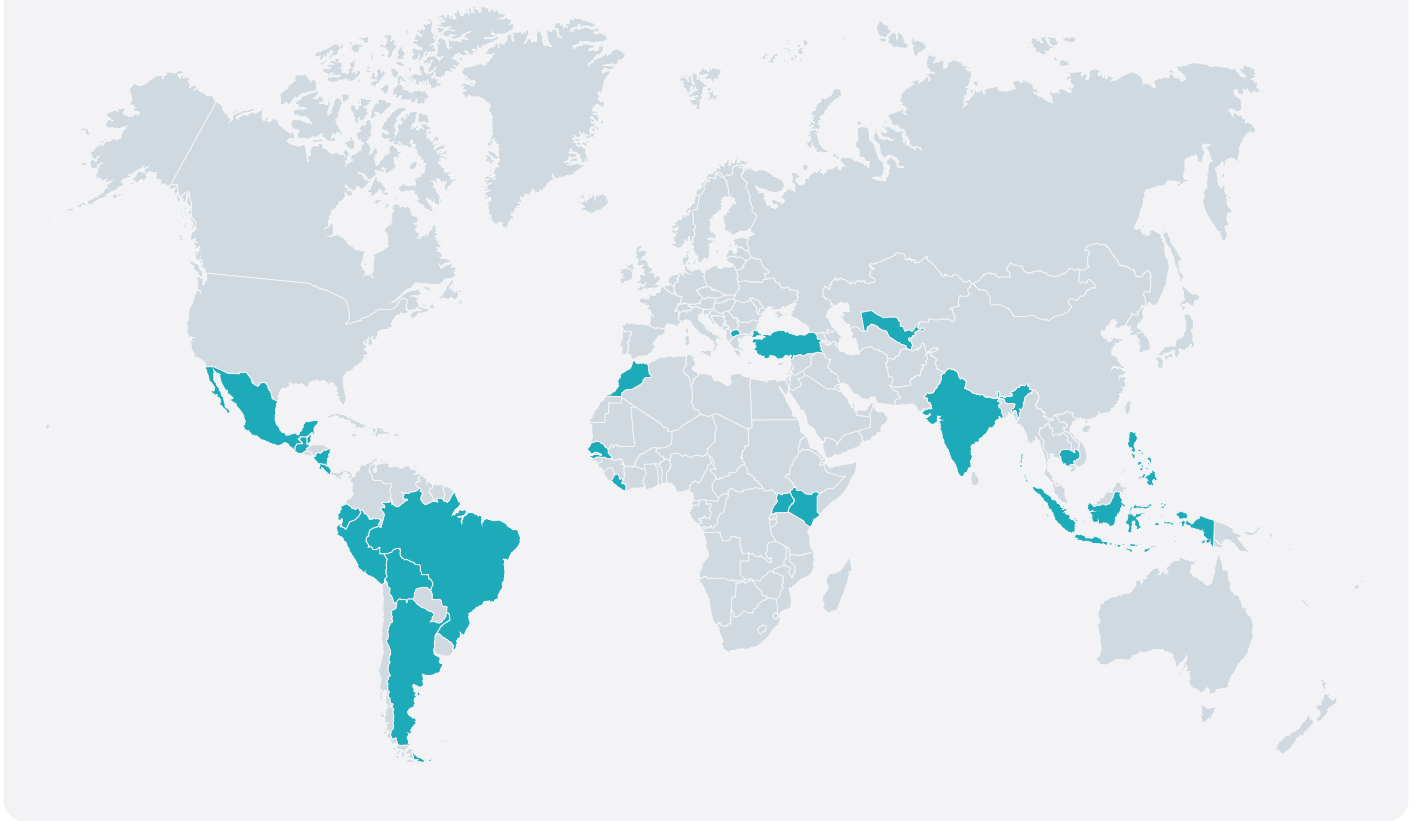
Qualitative Research and Case Studies

To complement the quantitative dataset and enrich the understanding of outcomes, particularly from the perspective of affected communities, the study also included an extensive qualitative research component. We conducted 45 semi-structured interviews across more than two dozen IAM-managed com-

4. See Appendix D for list of IAMs included in the analysis.

Table 2: Examples of categories of commitments identified from IAM processes

Commitment category	Description	Examples
Compensation	Material repayment to project-affected people for damage or loss suffered	Cash payments, land, collective compensation
Consultation & Disclosure	Measures to ensure communities are informed and consulted about the project and its impacts	FPIC, consultations, information disclosure
Environmental	Measures to prevent or mitigate environmental harm or to study/remediate existing damage	Environmental protection, environmental remediation, environmental studies
Livelihoods	Measures to support or restore income generation, employment, or agricultural activity	Job training, agricultural support, employment opportunities
Operations Management	Changes to DFI or project implementation strategies, staff practices, or internal policies	Policy changes, process changes, guidance notes, employee trainings
Project changes	Changes to the scale or timeline of a project in response to violations or harm	Temporary suspension, activity reduction, cancellation
Resettlement	Commitments to establish resettlement plans or processes for displaced communities	Resettlement action plans
Social support	Measures to support community well-being, services, and infrastructure	Health care, education, housing repairs, community capacity building

Figure 1. Interview locations

plaints globally. These interviews were conducted with community members, civil society advocates, and other stakeholders who were directly involved in the complaint process. We did not prioritize interviewing IAM or Bank staff as their perspectives and decisions were often already well documented in official complaint materials.

Our qualitative inquiry focused on the implementation and perceived success of commitments. We sought to understand whether and how promised actions were delivered, the barriers and facilitators to implementation, and the ways in which communities conceptualized and experienced “remedy.” Key questions posed to community members included: “What does remedy look like for you?” and “Was that remedy achieved through the IAM process?” In doing so, we aimed to center community-defined understandings of justice and satisfaction, rather than rely solely on institutional metrics.

Importantly, we recognized that terminology related to remedy is often context-dependent and shaped by linguistic and cultural interpretation. For example, terms such as “remedy” or “complaint” may not have direct or meaningful translations in local languages. Therefore, we worked with interpreters and

translators to surface equivalent terms used by communities, such as “solution,” “resolution,” or “response,” and grouped these within a broader conceptual framework of remedy.

We then analyzed the interview data using an inductive thematic coding process. After reviewing all transcripts, we identified recurring issues raised by participants and developed themes directly from their input. We then tagged each transcript accordingly, allowing us to explore patterns across interviews and surface shared and divergent experiences with IAM processes. This approach ensured the analysis reflected community concerns and language, rather than externally imposed categories.

Integration and Triangulation

The quantitative and qualitative strands of this study were integrated to provide a more holistic understanding of the IAM ecosystem’s outcomes. The quantitative dataset allowed for the identification of trends, gaps, and inconsistencies at scale, while the qualitative interviews added depth, context, and meaning to those findings. This triangulated approach enabled us to interrogate the gap between formal commitments and lived experiences of remedy, as well as to explore systemic factors that facilitate or hinder effective redress.

Photo: Seliana Marcelus, a community representative who sought accountability and remedy through a complaint to the Inter-American Development Bank’s independent accountability mechanism on behalf of more than 400 families (including her own) displaced by the Caracol Industrial Park in Northern Haiti.



Limitations

Regarding commitment tagging, we relied on publicly available data in order to assess what IFIs and their clients commit to provide to those who allege harm. Some institutions, most notably the European Investment Bank’s Complaints Mechanism, lacked comprehensive reporting on complaint outcomes and were therefore excluded from much of our analysis.⁵

For the remainder, we aimed to capture the totality of commitments beyond the perspective of their implementers, but even with a critical eye, our reliance on documents created by IAMs and IFIs may unintentionally provide a narrative heavily influenced by the entity with the written institutional memory, rather than both the community and institutions. Unfortunately, there is no equivalent document or set of documents available from the communities alleging harm. While we supplemented IAM documents with community interviews, the limited number of case studies and interviews represent an unscientific sample of known commitments, and cannot necessarily be extrapolated to represent all such cases.

To cover a broader scope of remedy, we have included interim agreements in our commitment tagging when they are available. In some cases, such as the complaints to the IFC CAO regarding impacts from the Oyu Tolgoi copper and gold mine in Mongolia, these agreements can include interim compensation which may then impact the final agreed upon compensation. However, IAMs do not often report the existence of — let alone publish — interim agreements. This lack of consistent public documentation limits our ability to consider interim agreements as an additional data source across all or even most complaints.

For interviews, we were limited by geography, funding, capacity, scope of re-search, community approval, and access. Thus, variations in region, mechanism, issue areas, etc., cannot be said to be fully representative of all complaints, and are over-indexed on institutions with easier access or existing relationships. Access to communities was often mediated by civil society organizations. In most cases, communities we interviewed had some degree of CSO support, which helped facilitate initial contact. As a result, the study may underrepresent the experiences of communities with little or no organizational support: those who often face even greater barriers to navigating IAM processes or accessing remedy, but who are less reachable through external research channels.

5. The EIB-CM is currently under review, and the review should result in an improvement in its reporting on outcomes and overall transparency.

In addition, interviews sometimes excluded topics we were not able to discuss based on our organizational and individual structural positions. For example we had no standing to ethically ask about sexual violence and sexual exploitation in some cases where it undoubtedly occurred, because of risks of re-traumatization. When possible and appropriate for sensitive matters, we engaged with civil society or other representatives rather than directly with community members.

Several potential interviewees were also excluded from the process entirely for fear that re-opening traumatic experiences would cause further harm that significantly outweighed any benefit that they could hope to achieve from the interview process. Therefore the data may be slightly skewed away from the worst experiences of community complaint processes.

We also limited our analysis to complaints with outputs, that is, those that underwent a compliance or mediation process. Outcomes derived from referrals to other bodies, informal arrangements, or even additional unrecorded commitments during processes that produced other outputs, are therefore not included despite the fact that they constitute a salient proportion of cases that produce remedial outcomes from these processes.⁶

6. The World Bank Inspection Panel, for example, is equally likely to close complaints outside of its formal process as within it: <https://accountabilityconsole.com/complaints/visualize/?iam=3>.



Findings

Having examined both the quantitative data and the lived experiences of affected communities, we now turn to the core findings of this report. These findings integrate insights from our dataset of 2,270 complaints, detailed commitment tracking, and 45 in-depth interviews across 25 cases. Together, they illustrate not only where IAM processes are working but also where they fall short.

What emerges is a complex picture: IAMs can and do deliver meaningful forms of remedy, but such successes remain inconsistent and often insufficient compared to the scale of harm. The sections that follow unpack this dual reality, highlighting patterns in the types of remedies achieved, the barriers communities face, and the systemic factors shaping outcomes across mechanisms and regions.

1. Accountability Mechanism processes are capable of producing creative, responsive, and meaningful remedy

The sheer breadth of remedies developed through both Dispute Resolution and Compliance Review processes is a testament to IAMs' capacity to produce creative solutions to often complex social and environmental problems, extending far beyond what could be produced by traditional litigation or state-directed modalities.

The list of completed commitments (see Appendix C) is long and reflects the multi-faceted issues faced by communities, as well as their tenaciousness in demanding responsive remedy to those issues. These wins are what bring communities to these processes, and reflect the reality that these processes can and do deliver remedy.

Commitments are often diverse and tailored to the particular needs and contexts of affected communities. The distinction between the two primary IAM pathways, Compliance Review (CR) and Dispute Resolution (DR), helps illuminate how these remedies come about and what form they take.

Compliance Review commitments are typically found in Management Action Plans and are generally responses to findings of policy non-compliance. This tends to result in commitments oriented toward institutional learning and systemic reform, despite the fact that community facing remedy is often the most appropriate response to policy-compliance. For instance, commitments like bank process changes (176 total, with 169 from CR), monitoring of project impacts (85 total, with 73 from CR), guidance notes and manuals (94 total, with 93 from CR), employee trainings (39 total, with 37 from CR), and bank policy changes (22 total, with 21 from CR) demonstrate how CR processes contribute to strengthening accountability and safeguarding systems. These outcomes, while often insufficient responses to direct harm, and therefore not immediately felt at the community level, are nevertheless crucial for reducing future harm and embedding lessons learned into institutional practice. Several interviewed communities noted that one of their key objectives was to “ensure that this type of harm does not happen to others” and thus even these institutional adaptations can be understood as a form of remedy.⁷

7. See for example Turk Traktor.

In contrast, Dispute Resolution processes are more likely to generate remedies that directly affect the lived conditions of impacted communities. These commitments stem from mediated agreements in which, instead of an “objective” third-party intervention into the problems at hand, communities play a more active role in designing the parameters of the actions to be taken. Thus DR commitments are weighted toward tangible, ground-level actions: cash compensation (69 total, with 50 from DR), community safety improvements (33 total, with 20 from DR), provision of community infrastructure (38 total, 25 from DR), educational support (19 total, with 17 from DR), and housing (11 total, with 9 from DR). These forms of remedy aim to address immediate harm, restore dignity, and repair relationships between project implementers and community members.

Some types of commitments are common to both pathways. For example, consultation — both as a corrective and a preventive measure — was a prominent commitment category in both CR (65) and DR (49), suggesting a recognition across complaint pathways of the critical importance of participatory processes. Similarly, environmental issues were regularly addressed through environmental protection (47 CR, 21 DR), remediation, and studies, showing that both pathways are capable of identifying and addressing ecological harm. For either pathway, once the substantive stage is completed, the likelihood of the complaint producing at least one commitment is over 80%.⁸

In total, this diversity of commitments, from apologies to land restitution, from project-level grievance mechanisms to microfinance programs, speaks to the unique role IAMs play in shaping remedy that is often unattainable through courts or administrative complaint channels. This includes commitments that are often regarded as impossible in other settings, such as cash compensation, access to new land, and formal apologies. While gaps remain, and many commitments are left unfulfilled, the evidence confirms that IAM processes are capable of producing responsive and sometimes transformative forms of remedy that align with community-defined needs and visions of justice.

8. This excludes EIB Complaints Mechanism data.

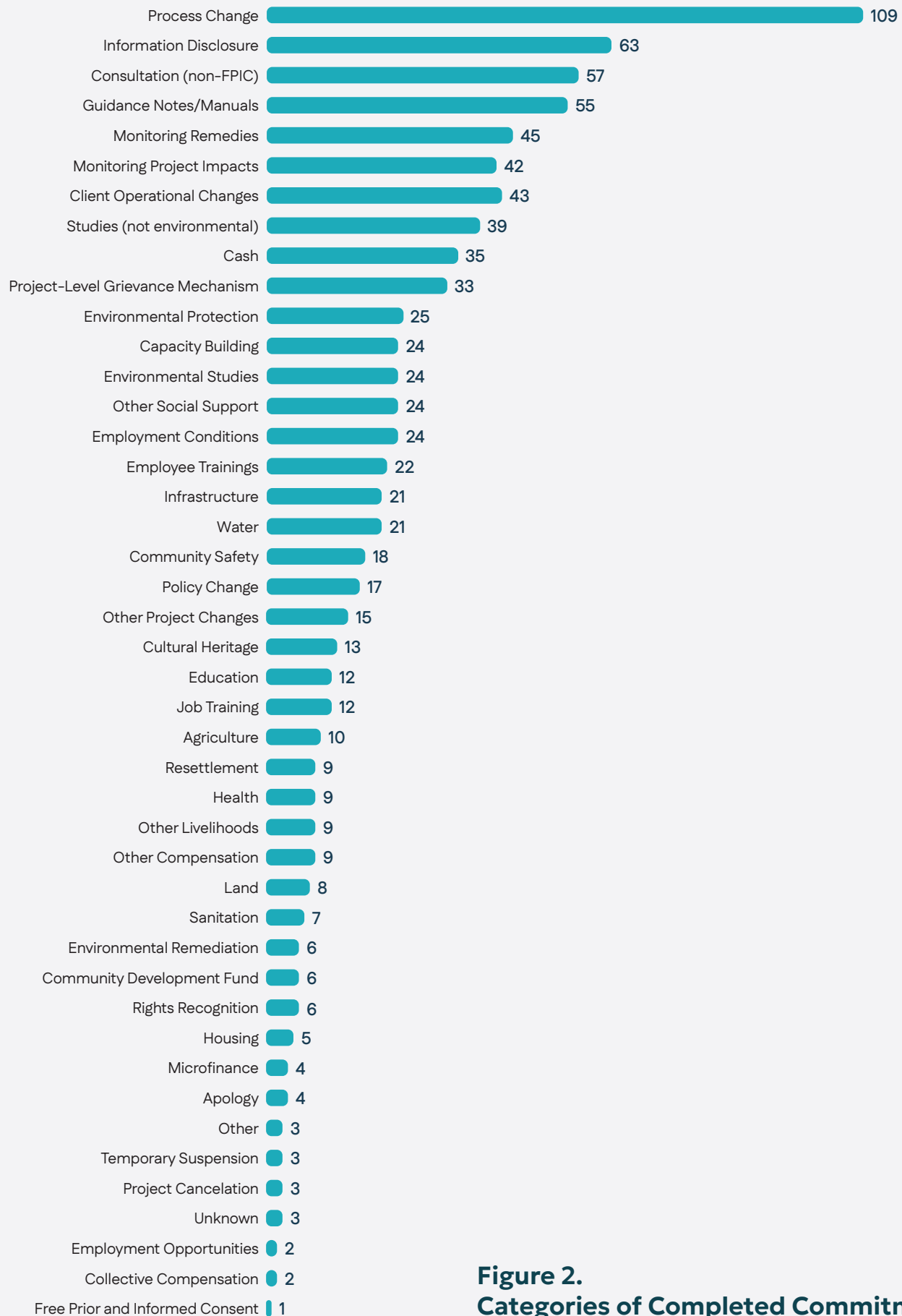


Figure 2.
Categories of Completed Commitments

2. Despite important successes, the scope of remedy is dwarfed by the scale of harm

Communities not only face many hurdles to accessing an IAM complaint process in the first place but also to reaching substantial outcomes. Of the 1,796 closed complaints included in the below analysis,⁹ only 255 have any public record of commitments being made, an overall rate of less than 14%. The number of complaints where a commitment has been reported to have been fully completed is significantly smaller, standing at only 174, or 9.7% of all complaints.

The picture is admittedly different if one focuses specifically on complaints that have been deemed eligible (though there are many reasons to be skeptical that eligibility is used consistently and fairly across all mechanisms).¹⁰ Of the 448 eligible complaints in our dataset, 43% (193 complaints) have publicly reported at least one completed commitment.¹¹

Some of the gap between complaints and outcomes can be explained by factors such as commitments that are still being implemented, missing data from IAM complaint registries, or “alternative” solutions found outside the formal IAM process. But, in 45 interviews with affected community members and advocates across 25 complaints spanning 10 institutions, communities made it clear that these accountability processes often failed to fully address their issues, provide adequate remedy, or fulfill their promises.

In an interview with an indigenous Maasai community in Kenya displaced by the Olkaria Geothermal Project financed by the World Bank and European Investment Bank, community members reported that after being resettled for the project more than ten years ago, they are still waiting for promised benefits and compensation. The project forced communities out and disrupted their traditional way of life. Their resettlement pushed them into unfamiliar terrain, causing livelihood issues, schooling problems, water access shortages, and

9. Data includes all complaints filed from 1994 through 2022, with the exception of the Complaints Mechanism of the European Investment Bank, whose public commitment data was not sufficiently publicized at the time of writing.

10. Lenci, Marisa and Belanger, Olivia. “The Eligibility Bottleneck.” Accountability Console, March 2021, <https://accountabilityconsole.com/newsletter/articles/the-eligibility-bottleneck/>.

11. This count includes complaints that were later merged with other complaints and treated as one complaint by the mechanism.

mobility challenges. Corruption in the resettlement process further exacerbated existing vulnerability, pushing minority groups such as orphans, widows, and members of minority tribes deeper into poverty.

It was a shock for us to go there, imagining we would have houses, only to find out there were no houses. So we went into the forest and just settled there. We live in horrible conditions. The new buildings are made out of paper, when the rain comes, it wipes us away and we have to build new structures. We don't have work to do. We barely have food.

”

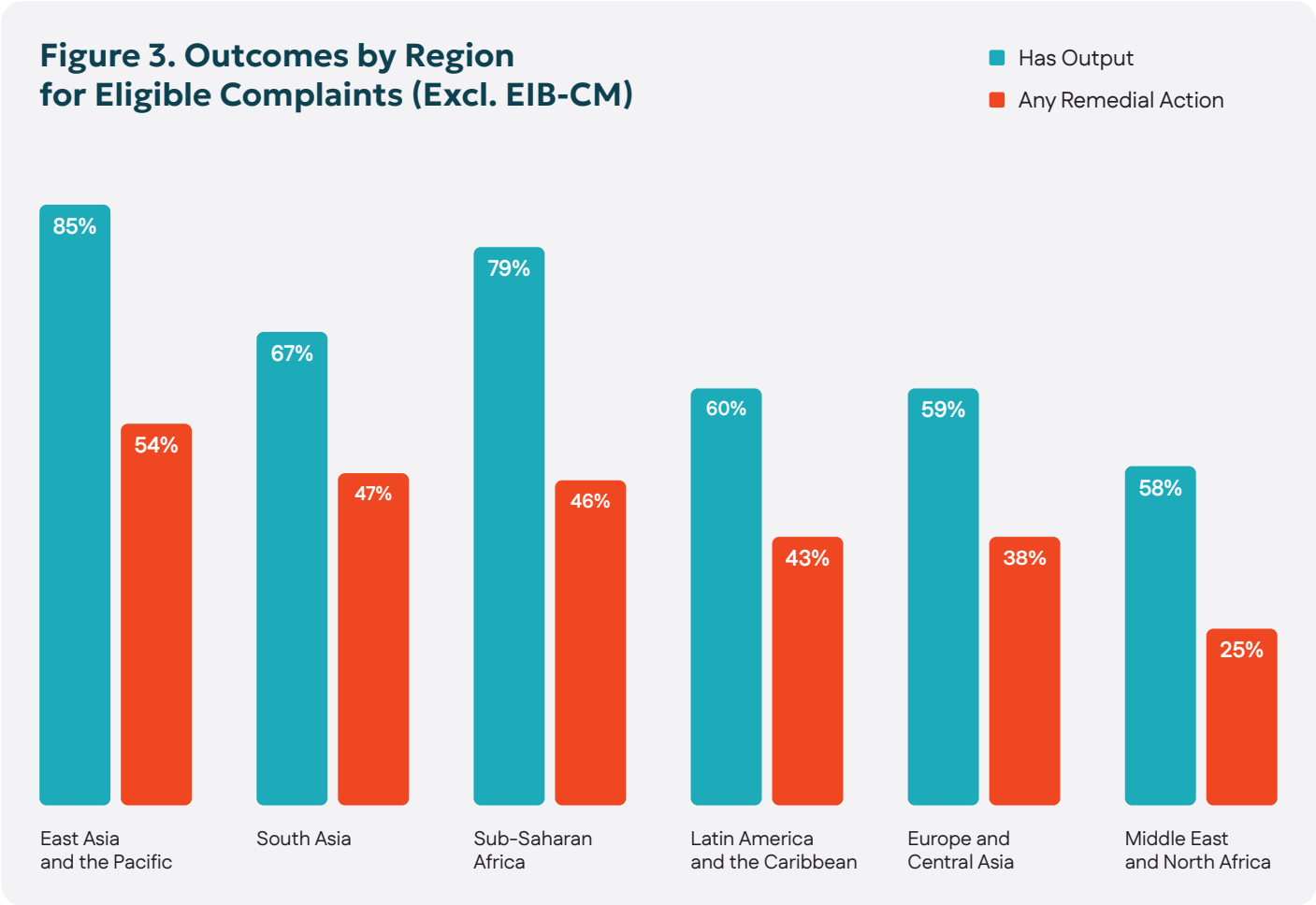
Olkaria,
WB IP

The World Bank Inspection Panel conducted an investigation and corroborated the community's complaint, finding several deficiencies with the resettlement process. The community then participated in a mediation with both the World Bank and European Investment Bank, after which the World Bank developed a management action plan (MAP) to address both the deficiencies noted by the Inspection Panel and the further issues raised during the mediation process. Notably, the Inspection Panel does not have an independent monitoring function. In its own self assessment on implementation of the MAP, the World Bank Management stated all actions were completed and that commitments by its client KenGen were “beyond the MAP and the Bank's oversight.”

Such self-assessments are suspect, especially when the very group found to have neglected proper due diligence is then asked to grade itself on remedy. Although the World Bank Management's final implementation report highlights construction of five additional houses for families affected by the project who were excluded by the initial resettlement plan, the community members we spoke with shared that this remedy was incomplete as 14 families required resettlement, the houses that were built were inadequate for the needs of those who relocated, and the relocation created transportation and other livelihood issues. Moreover community members stated that “[The Client] bribed each member 40,000 shillings to say it was fully implemented.”

Variations by region

Looking across different regions, we find that outcomes in the Middle East and North Africa (MENA) region and Europe and Central Asia region tend to be worse than in other regions, while a complaint filed in East Asia and the Pacific has a higher chance of seeing at least one commitment completed. In a previous report¹² we discussed how communities in the MENA face disproportionately severe limitations on access to accountability and remedy from harm.

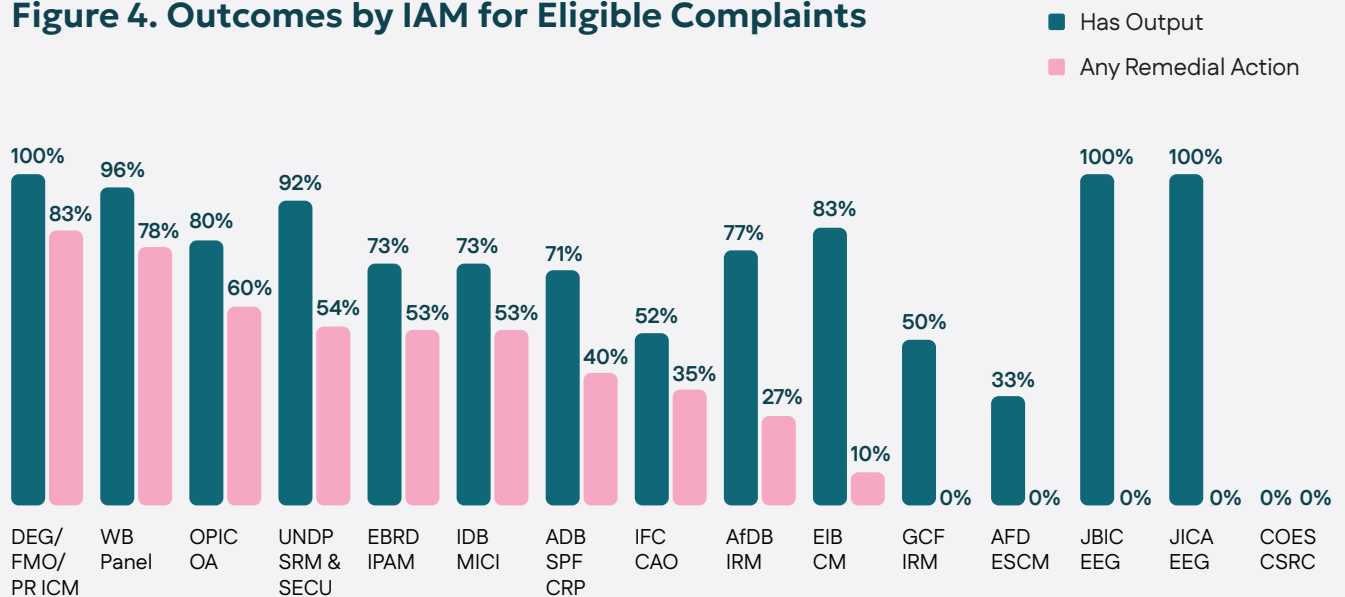


12. Our Last and Only Resort, Accountability Counsel and Arab Watch Coalition, 2022, <https://aconsole-static.s3.us-west-1.amazonaws.com/media/public/files/Our+Last+and+Only+Resort.pdf>.

Variations by mechanism

Looking across mechanisms listed in Figure 4, eligible complaints have on average a 73% chance of seeing an output from the process, i.e., a compliance report with investigation findings and recommendations or a mediated agreement. But, of those complaints, the likelihood of producing and completing commitments varies widely. Some of this is undoubtedly the consequence of differences in reporting standards. For example, as explained in the methodology section, we know that the EIB-CM's Bank Services does not have a practice of developing a publicly available action plan to address findings of non-compliance with bank safeguards, which is partly why EIB-CM commitments were excluded from the rest of the analysis.

Figure 4. Outcomes by IAM for Eligible Complaints



* Reported remedial action comes from Bank Management reports which in most cases are not independently verified.

3. Inadequate implementation is all too common

Across both dispute resolution and compliance review, both the data and interviews suggest that even when robust commitments are made, they are often inadequately and unevenly implemented. Our research identified the following issues: a lack of monitoring and communication with affected communities, cancellation and non-implementation of commitments, significant delays, and unfair distribution of benefits from land and resettlement agreements.

Lack of monitoring and consultation

The monitoring process is a pivotal time when promises for remedy, such as housing, compensation, and apologies, materialize into concrete action. This is the stage that makes or breaks remedy for communities, but the resourcing and policies of IAMs often fail to reflect this reality. The World Bank Inspection Panel, for example, does not have an independent monitoring mandate to ensure that action plans are adequately and fully implemented. The European Investment Bank has historically declined to publish regular monitoring updates on compliance review cases to inform stakeholders of progress on remedial action items.

One of the most common implementation issues cited in half the complaints where we conducted interviews was a lack of meaningful follow-up and ongoing communication after agreements or compliance reports were produced. There was a sense among complainants that once agreements or reports were finalised, mechanisms did not prioritize the tracking of whether commitments were actually implemented properly, resulting in unresolved issues or incomplete remedies.



Power Development,
WB IP

There was a step-by-step Action Plan in the report. It was never implemented. We did not take it seriously, it was only paper not being implemented to action. For example, financial assistance was supposed to be delivered for the community to do cattle farming, etc. The incident that happened was that one village person got 20,000 NPR, but it was documented as 20 lakhs. I think it was a massive embezzlement. Corruption happens in the implementation process.

After the report of the investigation, they did not follow up the implementation of that report. There was no monitoring process — they were not closely monitoring the process, and the recommendations from the report were not implemented. The Inspection Panel did some great work, but the company and management did not follow up.

”

Olkaria,
WB IP

MICI left too early, before delivering the last house. We felt there was a lot missing in this regard. The city government then changed. A different mayor was elected. Everything started from scratch again. The new mayor was from the same group that removed us, so we had to fight to get the minimum we needed.

”

Sao Jose,
IDB MICI

Communities were frustrated that monitoring ended before commitments were fulfilled, and that banks and mechanisms failed to engage directly with affected communities to assess progress. Instead, other parties, such as clients or local agencies, were often relied on for reporting at the monitoring stage. In some cases, communities spoke about monitoring reports being published online, but not shared directly with those affected, leading to a lack of clarity and trust in the process. The World Bank Inspection Panel’s lack of a monitoring function was specifically called out in a number of interviews. In both the Power Development and Olkaria cases, for example, community members expressed concern that Bank management relied solely on updates from clients or government agencies — the very parties responsible for the harm — without directly engaging with affected communities to verify whether commitments were implemented. This approach left critical issues unaddressed and created a perception that the Bank had abandoned its responsibility for follow-through.¹³ As an alternative, communities highlighted that monitoring could have been improved by making it more participatory.

They should have included the community in the implementation of the action plan. They should improve their work in actually implementing the results of the investigation.

”

Reventazon,
IDB MICI

13. In 2020, the World Bank Board of Directors approved changes to the Inspection Panel’s mandate that allowed the mechanism to independently verify the implementation of action plans in certain cases and only with Board approval. While this verification process is an improvement over solely relying on management self-reporting, the Panel needs the ability to independently monitor or verify actions in all cases, as is common at other IAMs.



Nenskra,
EBRD PCM

Findings of non-compliance were very strong. Recommendations were very strong. MAP was improved after a time. But monitoring? They are telling us it's done, but it's not shared. And if it wasn't done in a participatory manner, and they weren't consulted, how can it be done? What is carried out in a non-participatory way, doesn't count.

These frustrations were not, however, universal. One out of four interviewees praised effective monitoring processes as pivotal to pressure banks and clients to implement commitments. In AMBED, the CAO's monitoring helped establish an ongoing dialogue which was helpful to sustaining engagement with the client. Similarly, in Marrakech-Agadir, monitoring was seen as a key pressure point that compelled the client to listen and implement the agreement.



Marrakech-Agadir,
AfDB IRM

If there was no monitoring, [the Client] would not have listened. Nothing would have been done.

Non-implementation of commitments

Six percent (6%) of all commitments made are cancelled before monitoring concludes, with an additional 12% uncompleted within the monitoring timeline. Our complaint data shows two primary pathways by which commitments are not implemented: project cancellation and commitment cancellation.

Project cancellation, often a direct result of irresponsible or dangerous behavior on the part of the project implementer, can leave harmed communities stranded. It is not uncommon for a community to raise issues of harm regarding a financed project, leading to an IAM investing significant resources to an investigation or mediation which corroborates the harm, only to have bank management wash its hands of any responsibility by exiting the project or simply refusing to follow-through on further remedial action. When a development bank cancels or withdraws its loan, or when a client prematurely withdraws or repays its loans, two problems arise.¹⁴

14. It is important to acknowledge that some communities want to see a project cancelled and that sometimes project cancellation is appropriate. In those circumstances, the institution should ensure that communities are properly consulted prior to exit about the potential impacts, outstanding environmental and social issues are addressed, and there is transparency around why the exit is occurring.

First, it allows banks to escape accountability for harm already caused to communities. By terminating their financial involvement, banks lose the leverage needed to address the damage. Consequently, communities have no channel through which to compel the bank to provide a remedy. While rescinding funding may prevent future harm, it does not resolve past harm. For example, in the Rawalpindi Environmental Improvement Project,¹⁵ the Asian Development Bank (ADB) canceled a loan following community complaints about non-compliant land appropriation. Because the ADB had disaffiliated from the project, it could not be pressured to resolve the damage caused by its loan.

Second, after a bank exits, government agencies can use the funds already disbursed to advance the project, regardless of future financing. The process of an IAM often bears more weight with foreign partners like banks than on sovereign government agencies, making those agencies harder to challenge. Consider the complaint filed in 2011 with the Inter-American Development Bank's (IDB) grievance office by a Bolivian NGO regarding non-compliant consultation processes for a bridge construction.¹⁶ Before the case could be adjudicated, the Bolivian government shifted the project's funds to a different initiative. This move allowed both the government and the IDB to skirt accountability and resulted in the project's exclusion from information disclosure requirements. In this way, bank financing can empower harmful actions at any stage, while loan cancellation allows the bank to walk away from the consequences.

Below are quotes from IAM or bank documents which reflect the many ways by which banks and their clients evade responsibility for harm through early exits.

Overall, CAO finds that IFC's response to this compliance investigation has only partially addressed its project-level non-compliance findings and has not addressed associated risk of under-compensation as identified by CAO. As a result, CAO concludes that the response is unsatisfactory. Nevertheless, CAO has decided to close its monitoring of the investigation considering that IFC no longer has an investment in the Company and IFC has not committed to any further project-level actions to address the non-compliance findings.

”

Reventazon HPP-01,
IFC CAO

15. “Rawalpindi Environmental Improvement Project (Sewage Treatment Plant Component).” Accountability Console, <https://accountabilityconsole.com/complaints/rawalpindi-environmental-improvement-project-sewage-treatment-plant-component/>.

16. “Northern Corridor Highway Improvement Program – Santa Barbara – Rurrenabaque and San Buenaventura.” Accountability Console, n.d., <https://accountabilityconsole.com/complaints/northern-corridor-highway-improvement-program-santa-barbara-rurrenabaque-and-san-buenaventura/>.



Rural Land Titling &
Registration Project in
Peru – Third Phase,
IDB MICI

In April 2022, after more than four years of monitoring, having verified the sustained non-compliance with the Agreement, and taking into account the decision of the Government of Peru not to require the extension of the credit necessary to comply with the commitments assumed, the Mechanism informed the IDB Board of Executive Directors and the interested parties that the processing of the Case in the Consultation Phase is now finalized. In line with the MICI Policy, case management was transferred to the Compliance Review Phase.



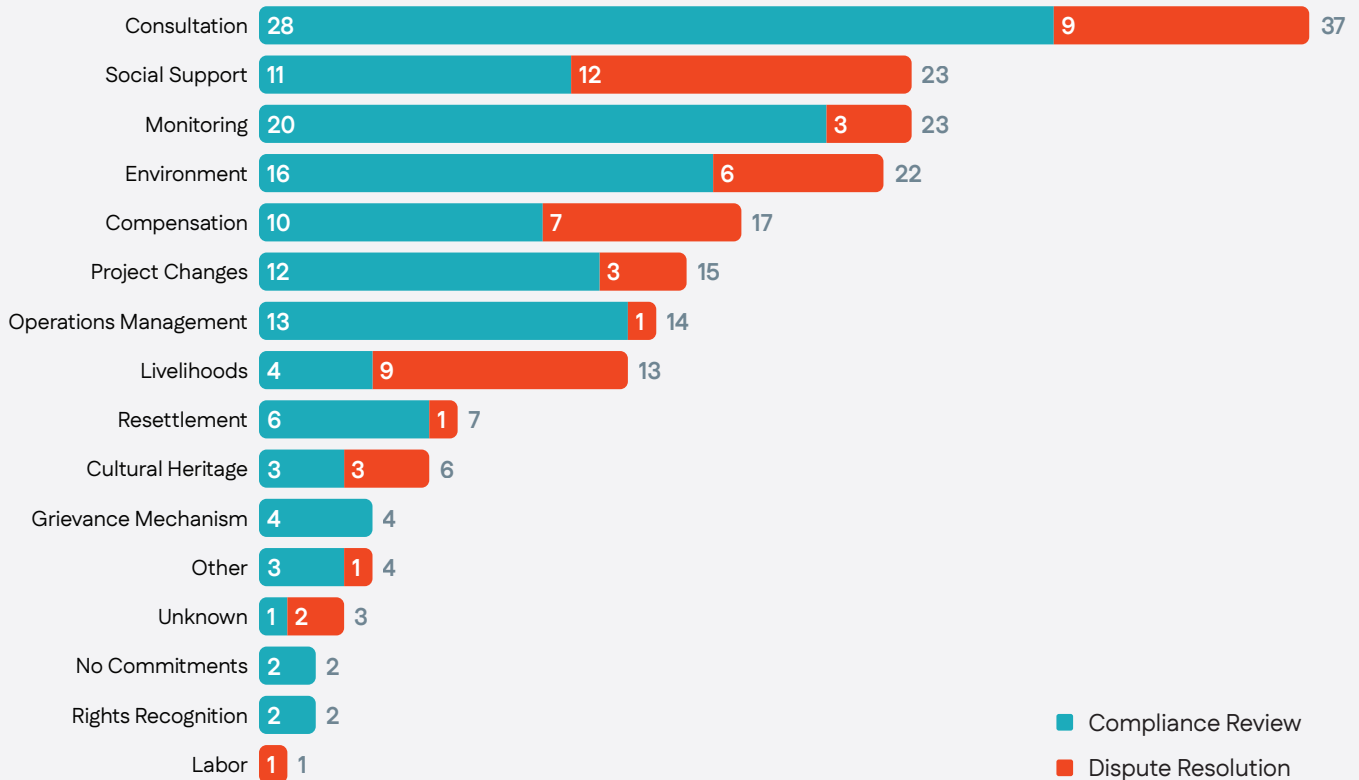
Western Poverty
Reduction Project,
WB IP

In 1998, the International Campaign for Tibet made a complaint to the Bank's Inspection Panel (the Panel) concerning the activities to be carried out in Qinghai Province under the then-named Western Poverty Reduction Project. [...] After a long investigation, which was concluded in April 2000 [...], the Panel concluded that the project preparation for the Qinghai Component was in apparent violation of several provisions of the Bank's operational policies. Subsequently, the Bank proposed to the Borrower an ambitious and extremely costly set of remedial recommendations that could have allowed the Qinghai Component to move forward. Instead of engaging in a lengthy process of remedial studies (that would not have guaranteed that the Qinghai Component could eventually move forward), the Borrower decided to drop the Qinghai Component in order to allow activities in Gansu and Inner Mongolia to proceed.



Turk Traktor,
EBRD IPAM

The Mechanism took note of the progress made on this action item during the current monitoring period. Mechanism reviewed the gap analysis in respect of Turkish law and ILO standards and updates from management on how the findings of the gap analysis will be reflected into the EBRD's own policies. The Mechanism noted that EBRD Management did not commission an independent review of the workers' dismissals against the provisions of the ILO Conventions and EBRD's requirements.

Figure 5. Complaints with Incomplete or Cancelled Commitments

Delays undermine remedy

Even when commitments are completed, implementation timelines often pose a frustrating challenge. Assessing the appropriateness of the timeframe of a complaint process or the implementation of remedial commitments can be difficult because sometimes it just takes time to properly address a grievance or implement commitments. However, delays worsen project impacts, affect livelihoods, and cause emotional strain. In our interviews we found that the longer the timeline, the more trust eroded in the IAM complaint process, as outcomes often felt insufficient given the time and effort invested. Many suggested that timelines should be shortened, with specific deadlines for actions.

Some of the people have already died — the timeframe has been longer than expected. Many of our colleagues have died, and some of them have even surrendered and said: ‘we cannot continue with this because we have been in this for so long’, and say: ‘to hell with this.’ We are not satisfied with the timeline at all.

”

Bujagali,
WB IP



Sendou,
DEG/FMO/PR IRM

It’s becoming more and more complicated for us to gather people to meet with the mechanism. Because after several meetings, nothing has been done. Is it worth it? It’s difficult to get people to keep engaged.

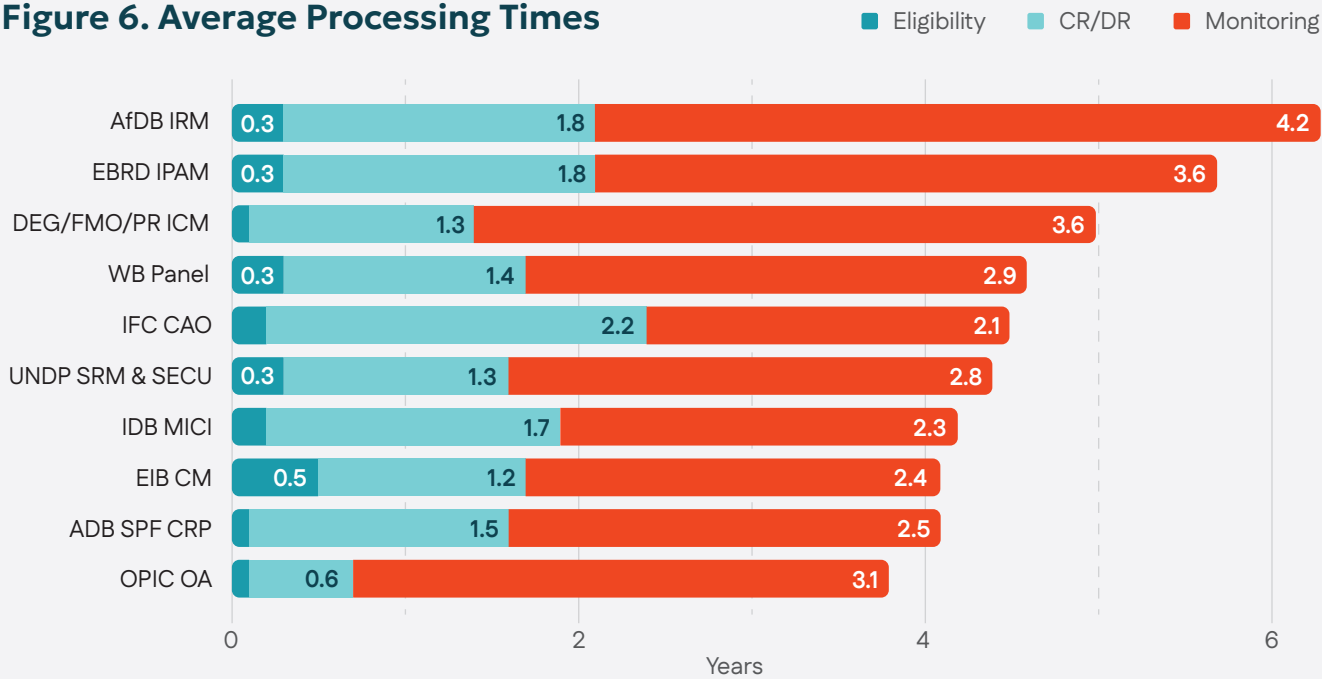


Marrakech-Agadir,
AfDB IRM

Delays were a problem, a real problem. For example, the source of water that was covered, for two years people had to get water from another village. While the waterway was blocked, they could not plant anything.

Though data on timelines for different stages of the complaint process is not consistently published for any of the mechanisms, the limited data we do have paints a stark but consistent picture across IAMs. The monitoring process to oversee implementation of commitments usually takes longer than the entire process to get the commitments in the first place.

Figure 6. Average Processing Times



Even knowing the challenges and long timeframes required to implement remedial solutions, however, communities often continue to choose to pursue these processes to achieve justice if those promises are actually delivered.

It's not about the number of years, it's about the result. If it takes ten years, if there's a real result, a remedy, you forget the time it took, because you have gotten justice.

Buchanan,
OPIC OA



Unfair distribution of benefits

Without very careful engagement with underlying social dynamics within target communities, benefits from accountability processes can often be skewed and unevenly distributed. This not only undermined the fairness and credibility of the process but also fractured communities, deepened mistrust toward IAMs and Bank clients, and made sustainable reconciliation more difficult. This was acutely present with regards to gender, where benefits distributed to “households” were often conferred to a male head of household with little consideration of how it would be distributed or shared within family units.

Several communities also raised specific issues about the unfair treatment of project affected persons in resettlement processes, where those who were similarly impacted did not receive equal benefits or were left out of the process entirely. In cases like Olkaria, Wilmar, and São Jose, land and resettlement agreements were unequally distributed, with some groups provided with land and housing while others not. Here too gender dynamics played a critical role, with women far less likely to gain access to new land compared to men.

Remedy cannot be considered appropriate or impactful if it reproduces the same dynamics of exclusion and harm that triggered the complaint in the first place. The community response to remedy in the Nepal Power Development Project is indicative of this dynamic:

There is a discrimination in offering the compensation for the people in the city area who are getting more. In the remote area people got less. People have dissatisfaction because of the differences in compensation.

Power Development
Project, WB IP



To address this, IAMs must prioritize equity and transparency in the implementation of remedy, ensure that all similarly affected persons are identified and consulted, and closely monitor the fair distribution of compensation and benefits as a core element of their follow-up responsibilities. Monitoring of benefits must be disaggregated by gender, class, and other economic and social factors to ensure fairness and comprehensivity.

4. Communities face significant burdens that may require CSO support to overcome

Retaliation and threat of violence

Across our interviews covering 25 complaints, 84% of complaints referenced instances of retaliation, violence, or threats of violence. Government officials and company representatives were frequently implicated in efforts to suppress dissent. This not only reduces the likelihood of achieving substantial remedy, but also suppresses the willingness of community members to speak honestly and openly about complaint outcomes. Communities described a range of retaliatory tactics, including:

- Physical clashes, arrests, detentions and fatalities;
- Economic hardship;
- Intimidation and harassment;
- Death threats and anonymous warning letters;
- Following and monitoring of community members;
- Legal intimidation and SLAPP (Strategic Lawsuits Against Public Participation) suits to silence opposition.

Despite the frequency and severity of these risks, institutional responses have remained weak and inconsistent. Although many banks have policies affirming the right of affected communities to participate — through stakeholder engagement frameworks or environmental and social safeguards — their practical protections to do so often fall short. Banks and IAMs often lack formal retaliation risk assessments, response protocols, and institutional strategies to prevent harm. Most have no clear channels through which communities can report retaliation related to their complaints or request bank protection during or after the complaint process.

Wearing Blinders: How development banks are ignoring reprisal risks finds that while some banks, including the World Bank, IFC, and IDB Invest, have made formal “zero-tolerance” declarations regarding reprisals, these commitments often exist only on paper.¹⁷ They are rarely backed by effective systems to de-

17. “*Wearing Blinders: How Development Banks Are Ignoring Reprisal Risks.*” Coalition for Human Rights in Development, June 2022, <https://rightsindevelopment.org/wearing-blinders/>.”

tect, prevent, or respond to retaliation in practice. The Wearing Blinders report finds that Banks “often [fail] to identify, assess, and avoid or mitigate the risks of retaliation that communities impacted by their projects might face.” Where risks are not adequately mitigated, “neither formal mechanisms (such as stakeholder engagement processes) nor informal ones (such as community-level meetings and public debates) can offer a safe space for affected communities to express their views on DFI-funded projects.” Under such conditions, meaningful remedy becomes impossible.

We heard from many affected individuals that they felt vulnerable and unsupported when engaging with IAMs. In some cases, communities faced immense pressure to abandon their complaints before they were filed. In others, threats and violence persisted throughout complaint processes and often led to unsatisfactory outcomes.

In Cambodia Airports, community members described how threats escalated when they attempted to protest the project. Instead of protection, the IAM placed conditions on participation in the IAM process that suppressed their ability to speak out:

We were threatened by local authorities whenever we protested. They gave threats, beat us, and indirectly we received letters of warning... It made the CAO seem like they were siding with the authorities, because the authorities also restricted us from protesting.

”

Cambodia Airports,
IFC CAO

In Nepal, a community member described how the police violently suppressed protests, followed by the World Bank shifting blame on the protesters themselves:

The police members started being violent. One woman community member was hurt and rushed to the hospital. Police arrested dozens of people, including myself. I spent two nights in police custody. Eleven persons were taken into police custody, and I was taken into jail for two nights... Because of the clashes between communities with police, the World Bank changed the plans and only invited community representatives to the hotel in Kathmandu. The World Bank told the community that ‘The transmission line is not very problematic, a lot of projects like this have happened in many parts of the world. Why did you protest?’

”

Power Development
Project, WB IP

Legal harassment was also weaponized to silence opposition. In Armenia, the company behind the Amulsar gold mine filed over 20 defamation lawsuits, including against activists, journalists, and even members of parliament:

“

Amulsar,
EBRD PCM

Lydian sued me specifically — this lawsuit has been ongoing for five years now. [...] They sued me for statements or opinions I made in my interviews, or I wrote on my Facebook. They decided it was defamation and detrimental to their good reputation.

Other forms of suppression were more covert but no less damaging. In Morocco, a complainant shared: “For 10 years now, there has been a blacklist of people who make trouble for companies and won’t be hired.” (Zalagh, IFC CAO)

Retaliation often persists long after formal complaint processes are undertaken. In Ecuador, a community leader was forced to flee the country after receiving death threats linked to their advocacy, even while the complaint remained under IAM review:

“

Areas Affected by EQ in
Ecuador, IDB MICI

The situation’s not changed, I’m still receiving threats from the government; I’ve been through difficult times. For example, when things were going our way I received death threats. I’ve been called to the Attorney General’s office. I was the visible head of everything going on, so it was easy to attack me. I left because I received a death threat, which I also complained about. After I left — I left 4 years ago — I didn’t tell anybody. People were following me and harassing me. My parents knew I was being followed. I was being called by the prosecution service. I was told: either they’re going to put you in prison or kill you, so get out of here. In 2 days I was out. It was really difficult for me. It’s affected my whole life. [...] Some activists have remained there and they are still protesting locally. There’s far more pressure now to keep quiet.

One civil society organization (CSO) representative from Mexico described a similarly alarming situation:

“

Mareña Renovables,
IDB MICI

There were a lot of contract killers hired [...] From the beginning I was surprised about the safety measures, even to meet with me. When I got back it was sad to hear that the head of the community radio was getting threats and had to flee. The context was filled with a legacy of violence.

The consequences of these institutional gaps are severe. As these cases show, institutional silence can exacerbate risk, while meaningful intervention can help de-escalate it. Communities in Cambodia Airports and Wilmar reported that threats diminished once IAMs or banks became involved. In Bujagali, a strongly worded letter from the World Bank to the client led to an immediate withdrawal of intimidation tactics.

Power imbalance and accessibility challenges

Communities engaging with IAMs consistently encountered structural barriers and power imbalances that undermined their ability to meaningfully participate. These issues cut across every stage of the IAM process, severely limiting access to culturally appropriate remedy.

Barriers to access and understanding

Without proactive support from IAMs, many communities struggled to navigate complaint processes and were left feeling isolated and unsupported. These barriers are often compounded by poor communication from IAMs, even years into ongoing complaints. The Shuakhevi community in Georgia, for instance, faced communication issues with all three IAMs it dealt with, for a project funded by the ADB, EBRD, and IFC:

After this complaint, there was one representative, a man from the Asian Development Bank, who met us and said he would clarify this issue in one week. No one has heard from him since then. It has been 8 years.

”

Shuakhevi,
EBRD PCM

In the case of the IFC’s CAO, a community believed their complaint had been closed, having received no updates for over 18 months. During our interview, we checked the status online and confirmed it was still under compliance review, despite the lack of communication from the IAM. This confusion over case status was not an isolated phenomenon. Multiple communities described long silences from mechanisms and an absence of proactive communication. In some cases, this led communities to incorrectly assume their case had been closed, as in Shuakhevi. In others, it weakened trust in the process and in IAMs, reducing the likelihood of developing and sustaining remedy.

Language barriers and document accessibility

In addition to communication issues, language and document accessibility were persistent barriers across complaints. IAMs frequently failed to provide materials in local languages or to explain technical content in ways communities could understand. This has severely limited community consultation on effective remedy modalities.

A representative from Uganda explained a common frustration:

“

Bujagali,
WB IP

Most of the documents were not translated, from all four processes we went through. They remain in English. When you go to these communities, some speak English, but only a very few. The majority only know local languages. In reality, it is very unfortunate that these documents are oftentimes not translated.

This often left communities reliant on CSOs or bilingual members to interpret reports and agreements — delaying community understanding and increasing dependence on intermediaries already stretched for capacity.

Logistical and financial obstacles

Transportation and meeting logistics also posed challenges. IAMs and bank representatives often held meetings in distant cities or inaccessible locations, such as upscale hotels far from affected villages, making it difficult for poorer or rural community members to attend. One interviewee in Olkaria noted:

“

Olkaria,
WB IP

The meetings don't happen in the village. They happen in big hotels where we cannot go or participate.

The role of IAM staff and mediators

Several communities highlighted the important role that individual IAM staff can play in building trust and improving the complaint process. In cases where IAM staff were seen as transparent, responsive, and respectful, communities reported feeling more supported and heard by that specific staff member, and often reported higher satisfaction with the complaint's outcomes. These experiences suggest that investing in empathetic, skilled staff who can engage meaningfully with affected people can make a critical difference in how communities

experience IAM processes. These examples underscore that while structural reforms are essential, the actions of individual IAM staff can either reinforce or help counter institutional inequities — and their role should not be overlooked. Below is just one example of a highly positive experience with mechanism staff.

MICI worked with us for a whole year. When MICI arrived, the first thing they did, the best thing that could have happened to us, they met with us and all the neighbors, trying to tease out the issues we were most concerned about, the issues we wanted to broach, different ways of going about things. One was to stop the public works, but we didn't want that. We wanted it to be finished quickly. It was great that MICI came [...], they guided us during these meetings to reach points that we agreed upon. [...] They helped me, guided me, taught me how to negotiate, and to not take notice of people who were just hindering the process. What we got through MICI was everything, everything.

”

Productive and
Tourism Infrastructure
Program for the
Province of Rio Negro,
IDB MICI

Exclusion through representation structures

IAMs often rely on designated community representatives to attend meetings, provide updates, or make decisions on behalf of affected communities. But in several complaints, communities reported that these representatives were not democratically selected, did not reflect the full diversity of affected groups, or were subject to manipulation and bribery. This led to broken trust and, in some cases, to remedy packages that benefited the powerful few while leaving out more vulnerable groups. For instance, in Olkaria, we spoke to community members from tribes that were excluded from the representative committee (referred to as RAPIC), which was not chosen by the community. The majority was appointed by the company, with the minority elected by the community. Representation within that committee was further compromised as some committee members were bribed by the company, resulting in biased representation.

[The company] did not give the community the right to choose the members of RAPIC.

Olkaria,
WB IP

”



Olkaria, WB IP The Samburu and Turkana are not represented in RAPIC. Only Maasai's are in RAPIC.

As in the case of Olkaria, in some instances entire ethnic or social groups were excluded from representation structures, further enforcing marginalization and frustration with uneven results.

Exclusion of women and youth voices was also common. Although some communities ensured gender inclusivity within their own representation structures, others reported significant exclusion of women from decision-making: “Only men, sadly [...] Just the head of the household who would speak.” (Marrakech, AfDB IRM). This was similar in Shuakhevi and Olkaria. In Olkaria, the exclusion of youth created issues when fathers passed away before remedy was provided.

Cultural disconnect

A number of interviewees described a deep cultural disconnect between IAM processes and community norms or worldviews. IAMs often operate using Western-centric procedures that were not familiar to communities, and sometimes clashed with traditional forms of decision-making or collective voice. Western-style, interest-based mediation can often be unfamiliar, and at odds with how community conflict is traditionally resolved.

In Nenskra, for example, interviewees noted that Western-style, interest-based mediation was foreign to them, and at odds with how community conflict is traditionally resolved. One interviewee described the community following honor- and spirituality-based mediation practices¹⁸, noting, “If there is dishonesty, it is a threat to our whole clan. [...] What you are describing as mediation is interest-based, and we’re not going to do that.”

Cultural norms around land, livestock, and family structures were also fundamentally disrupted through resettlement processes that did not reflect communal values or consult the full range of affected people. In Bujagali, a man with two wives was resettled into a single house, disrupting traditional family structures and causing dissatisfaction. Elsewhere, as in Zalagh, communal grazing land was fenced off and privatized, severing communities from resources integral to their collective identity and livelihood. One interviewee noted:

18. See, for example: <https://www.fao.org/4/ac696e/ac696e09.htm>.

”

The problem is that the land was used by the whole community to graze — it was grazing land. So it will never be possible for us to get satisfaction. This land was public land. When the company came, they put a fence around the land and no one could access it.

These cultural disconnects left some communities feeling further marginalized by the very process and remedy meant to support them.

The critical role of CSO support in achieving outcomes

CSOs often serve as the bridge between communities and IAMs, particularly in navigating the structural and cultural barriers discussed above. Our research shows that their presence significantly increases the likelihood of complaints progressing through IAM processes and securing commitments. Out of 2,147 total closed complaints, only 290 (13.5%) were confirmed to be supported by CSOs (see Figure 7). Yet these accounted for 42% of cases that resulted in commitments (see Figure 8).

Figure 7.
All Complaints

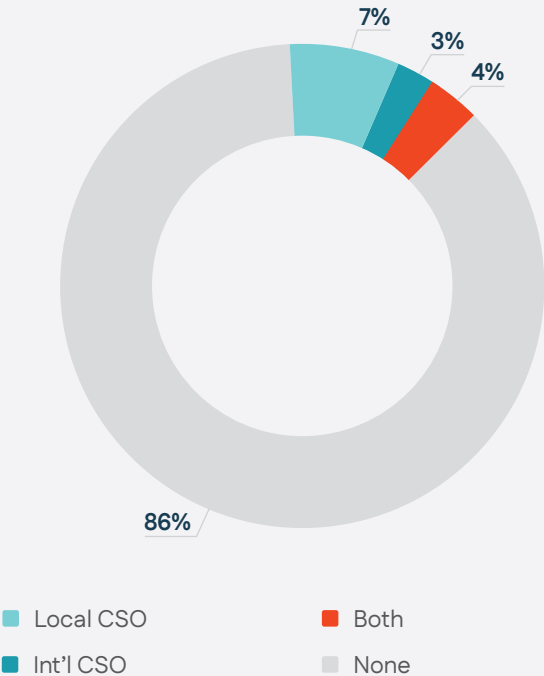
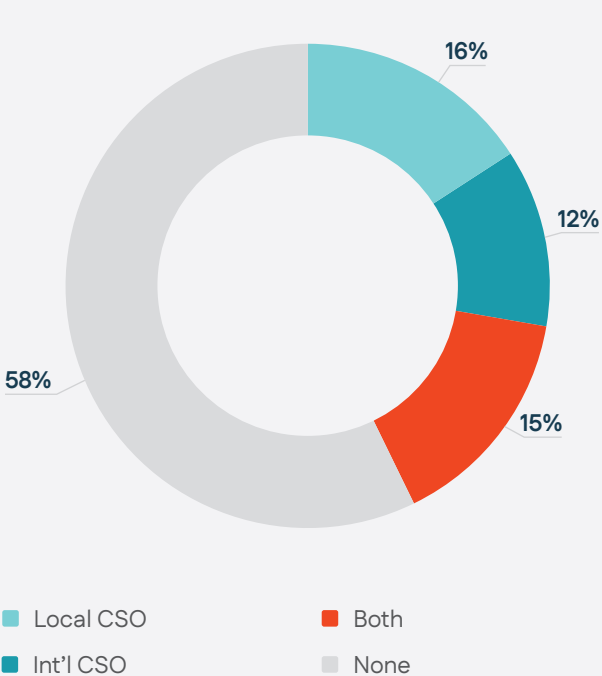


Figure 8.
Complaints with Commitments



CSO support played a critical role in:

1. Learning about IAM processes: Many communities were unaware of IAMs until informed by local or international CSOs. One CSO representative noted,

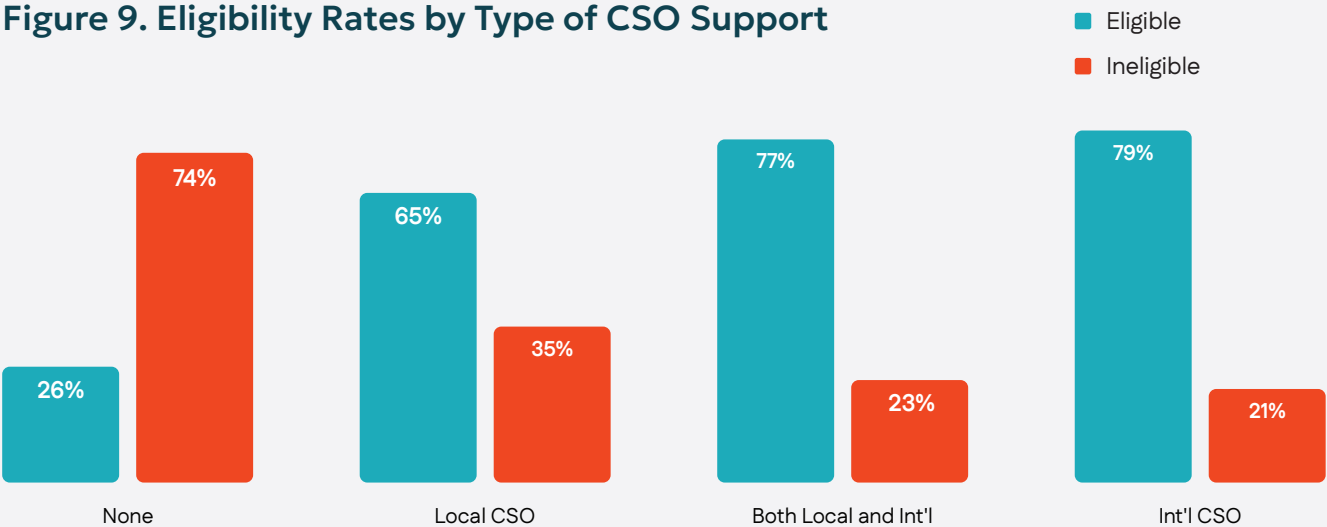
“

Ecuador,
IDB MICI

They didn’t know that MICI existed, or didn’t know how to get the documents to them, or didn’t have the training. I am sure 80% of people don’t agree with development projects but they don’t know how to log their complaints with these projects.

2. Improving eligibility rates: Complaints with CSO support were significantly more likely to be deemed eligible by IAMs. Without CSO support, only 26% of complaints were found eligible, whereas eligibility more than doubled with CSO assistance (local, international or both) (See Figure 9). Eligibility bottlenecks, often based on spurious or inconsistent criteria, have been a key structural barrier to achieving outcomes from complaint processes.

Figure 9. Eligibility Rates by Type of CSO Support



3. Navigating complex IAM processes: A majority of complainants interviewed noted that CSO support was a vital factor in their ability to navigate the complex IAM processes, and that they would not have been able to navigate it without that support. Communities spoke of CSOs providing guidance, capacity building, strategic and legal advice, and regular updates on the status of the complaint, all of which were crucial in securing tangible outcomes from the IAM process.

When questioned about who explained the IAM complaint process to them, a community member in Cambodia Airports spoke about CSOs filling in that role:

We received a lot of support from the CSO. They trained and educated us on basic legal knowledge, strategies to negotiate and communicate, and IFC's policies.

Cambodia,
IFC CAO

Another community member emphasized how the CSO they worked with significantly strengthened their complaint:

Their support helped strengthen our case, preventing us from getting evicted. Without their support in filing our complaints to the World Bank, we would've been evicted. Without their support in filing this complaint, we wouldn't have been able to meet the other parties and make our demands heard.

Cambodia,
IFC CAO

4. Increasing commitments and implementation rates: As can be seen in Figure 10, complaints with CSO support averaged about eight commitments per complaint, compared to five for those without CSO support. More commitments were successfully completed in CSO-supported cases (four per complaint) compared to those without CSO backing (two and a half per complaint).

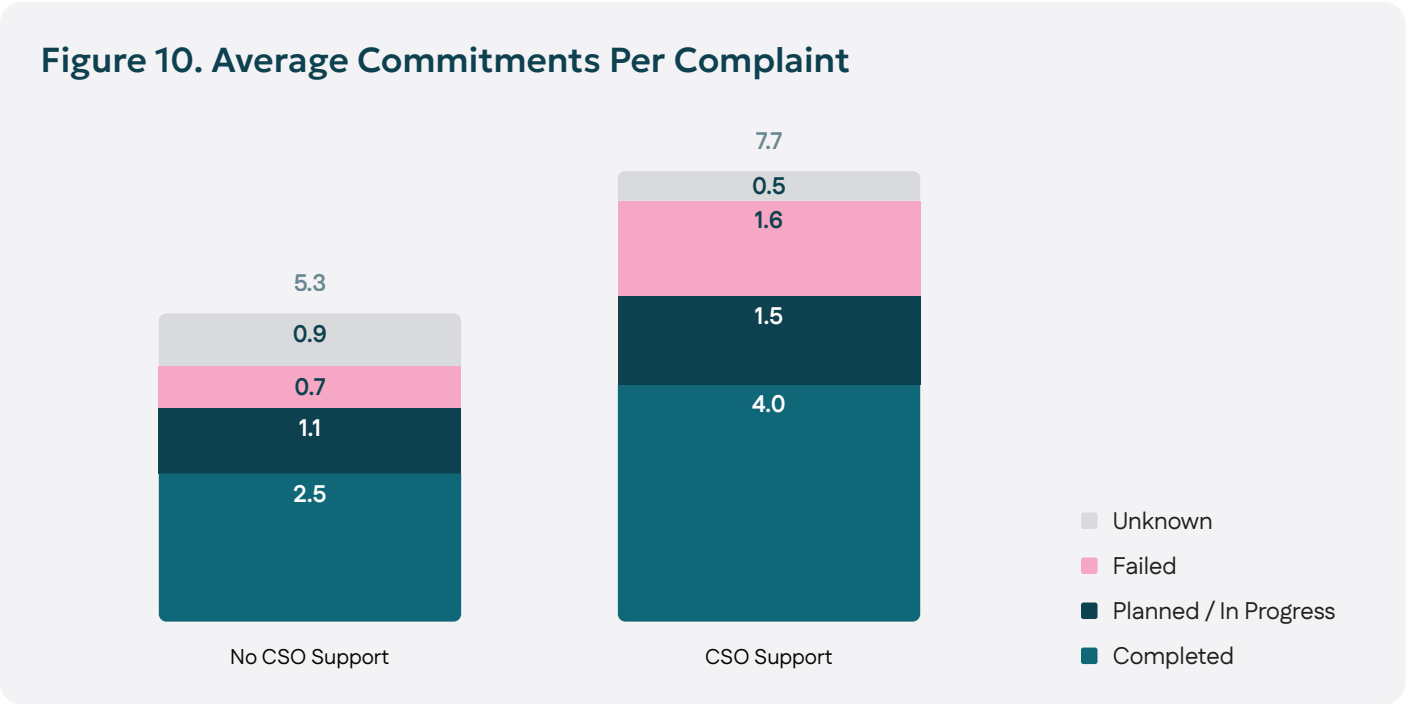
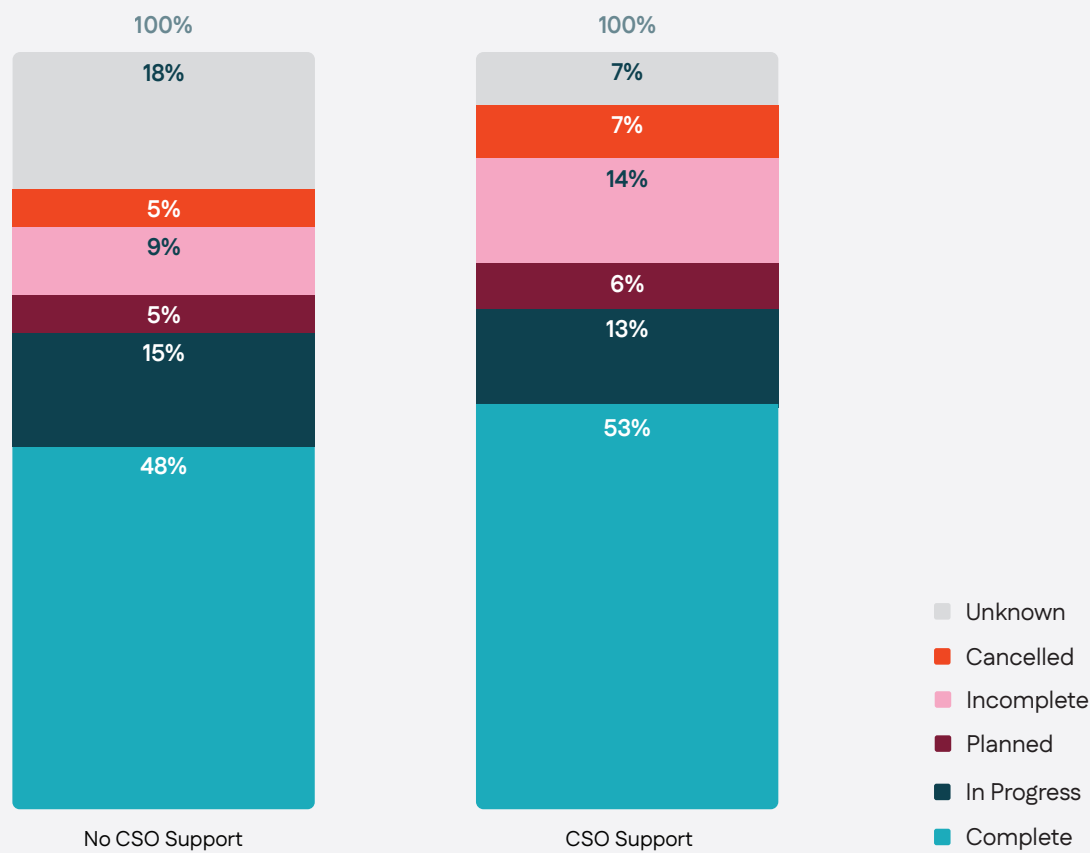


Figure 11. Commitment Status by CSO Support Type



Despite these benefits, third party CSO support is not always a realistic option for communities, and in some cases, IAMs and banks have even created hurdles to seeking CSO assistance, with restrictive rules and practices around representation. Communities repeatedly called for more institutional resources to support their participation in a manner that reduces their over-reliance on CSOs to achieve outcomes.

5. Most IAMs focus reporting on metrics about process rather than outcomes

This report was inspired by a desire to understand whether the independent accountability mechanism ecosystem is delivering meaningful remedy for communities harmed by projects on a systemic level. While we have been able to collect a variety of data points from IAMs about their accountability processes, most datasets stop at reporting whether there was an agreement reached or compliance report issued, and whether there was follow-up monitoring of action items stemming from these outputs. There was not a single IAM that tracked commitments resulting from these processes in a systematic, public and transparent manner.

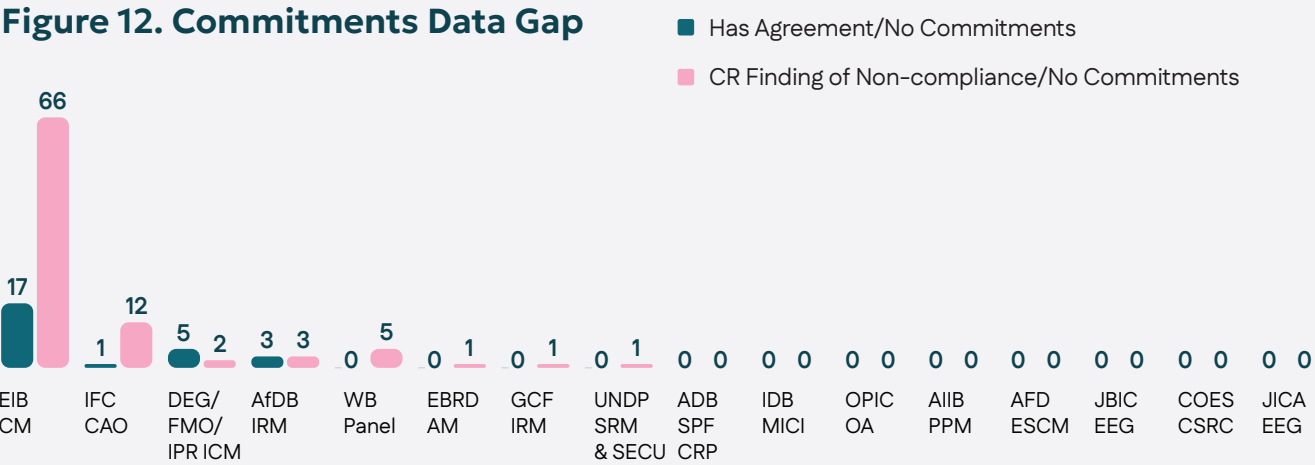
This is a glaring omission; one we hope to encourage IAMs to change. In this report, we use the data that we were able to find to highlight the state of remedy across IAMs. As communities noted in interviews, independent monitoring that focuses on accomplishing all commitments is what creates pressure for management and their clients to make good on their promises to remediate harm. We believe that making this tracking public on a case level adds pressure to this impetus for all stakeholders. Moreover, we believe that making this tracking systemic across all cases is necessary to assess the overall effectiveness of these accountability processes and to highlight gaps where attention is needed to improve these processes.

The good news is that many IAMs do have a practice of publicly tracking commitments made on a case by case basis. This tracking is not always consistent from case to case and is often embedded in lengthy monitoring reports. Nonetheless, this important information is what enabled us to begin to systematically quantify results from these IAM processes.

However, there remain significant gaps in public reporting of commitments, as can be seen below. Figure 12 shows that EIB-CM, the second largest IAM by volume of total complaints received, is not as transparent about commitments coming out of its processes as its peers. For this reason, we've had to exclude this mechanism from several of our analyses. A large part of this lack of transparency is explained by its esoteric policies in compliance review cases. In instances where the EIB-CM finds maladministration and makes recommendations for bank management to remedy the issue, Bank management is not required to publish a responsive action plan. Instead, there is a tacit understanding that if management does not object to EIB-CM's recommendations,

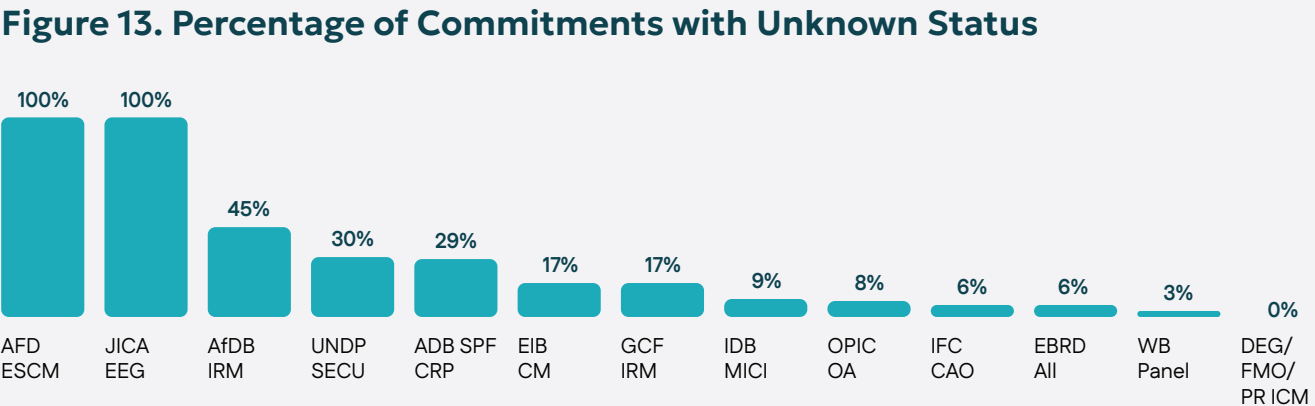
it is required to implement them. However, this then leads to a secondary transparency issue at the institution where the EIB-CM in most cases does not publicly acknowledge how recommendations were or are being addressed.

Figure 12. Commitments Data Gap



In most cases, IAMs report commitments resulting from their cases. Even where the details of dispute resolution agreements are kept confidential, IAMs usually report general outlines of the agreement, which allows the public to understand what complaints achieved in relation to the issues raised by complainant communities. However, as can be seen by Figure 13, there is still work to be done across most IAMs to ensure that all commitments are followed through, and that there is transparent and consistent reporting of the status of commitments. When remedy relies largely on the completion of these hard-fought commitments, it is one of the most important measures for IAMs and the institutions they monitor to understand the strength of their own commitment to accountability.

Figure 13. Percentage of Commitments with Unknown Status





Recommendations

Recommendations for Banks

Although development banks typically have safeguards and due diligence policies to reduce the likelihood of harm from projects they finance, the reality is that harm does regularly occur. Our research indicates that while accountability mechanism processes do produce remedy when their banks contribute to harm, that remedy is more often than not inadequate and people affected by bank-financed projects remain worse off.

In order to live up to their mandates to support a better world, banks must do better in addressing unintended harm from projects. Based on our research and the suggestions of multiple communities directly harmed by bank-financed projects and their advocates, we share the following recommendations for Banks to support better outcomes when they contribute to harm.

1. Develop a remedy framework

Banks should first and foremost develop a framework for approaching remedial action that centers communities' needs to repair harm. This framework should commit to:

- **Leave affected communities better off or at least not worse off.** At a minimum, Banks should commit to ensuring that any adverse effects from their projects will at the very least restore people to the standard of living they enjoyed before being harmed by a project.
- **Make sufficient funds available for remedy.** Given the heavy bureaucratic burden of finding funds for remedy and the delays caused to make these funds available, Banks should set aside contingency funds and establish mechanisms for funding remedy at both the institutional and the client level.
- **Center community voices in defining remedy.** Our research shows that the most common commitments arising from complaints about harm are changes to banks' internal operations. This is helpful for preventing harm in future cases, but is not typically what communities demand or need when they have been directly affected by extant projects. Remedy should be designed in regular consultation with affected communities, and grounded in their worldviews and experiences. As shown by Figure 2, remedy can take many different forms and should be tailored to the type of harm incurred and community input on appropriate redress.

- **Use leverage when a client is causing harm.** Banks have many tools at their disposal in order to prevent or stop a client from harming a community and to ensure they remedy harm fully and promptly. They should define these contractual and financial tools (e.g., cancelling, suspending, or conditioning funding, creating blacklists, using contractual remedies) and specify how and when this leverage would be used.
- **Develop and interface with responsible exit principles.** While the threat of project exit can be strong leverage, six out of the 25 complaints where we conducted interviews spoke of early exits which left communities in a vulnerable position with unresolved issues and a diminished ability to seek remedy or ensure accountability. Banks should ensure that remedy for environmental and social impacts is a key part of responsible divestment. Furthermore, banks should not exit a project that is subject to an active IAM process without an exit plan that includes consultation with the impacted community and safeguard to ensure that their human rights will be respected. Banks should also increase the penalties in contracts for clients who exit early without remedying harm.
- **Design management action plans and agreements with concrete, detailed, measurable, and time-bound commitments.** When there is a clear acknowledgement of unremediated harm, there should be a detailed action plan produced with realistic concrete actions, measurable goals, and specific deadlines. Affected community members should be consulted on these plans and provided with a finalized version of these plans.
- **Incorporate interim relief while people wait for remedy.** Our interviews revealed how delays in implementing remedial action often worsened project impacts, affected livelihoods, and caused severe emotional strain. Commitments often take multiple years to implement, following multiple years of dialogue or investigations. Interim relief should be provided as people wait for the benefits of longer-term commitments.
- **Define how financial intermediaries will be covered by these policies to protect communities harmed by sub-projects.** Development institutions are increasing finance through financial intermediaries, with financial intermediary investment constituting over 50 percent of some institutions' portfolios. Given the wide use of financial intermediaries and the harm that sub-projects can cause, Banks need to ensure that they are also effectively planning for remedy for impacts caused by these investments.

2. Empower IAMs with institutional support and remedy mandates

In order to ensure that IAMs can adequately follow-up on complaints and provide needed support during the monitoring and implementation phase of commitments, Banks should ensure that IAMs have the resources and power to carry out their mandate. This requires ensuring that they have adequate staffing, budget for independent consultants and studies, independence from Management, and tools to ensure that Management follows through on recommendations and commitments. In some cases, this may also require re-evaluating the scope of IAM mandates to include express provisions to ensure remedy where harm is found and to ensure monitoring of commitments in response to tacit or direct acknowledgements of harm. A robust remedy process depends on IAMs having the independence, tools, and support to follow through meaningfully.

This is particularly true for IAMs' ability to craft remedial solutions. IAM documents reference numerous instances where the harm to communities is recognized but the options for compelling remedy felt too restrained to meet the moment. For example, below is an excerpt from MICI's Compliance Review Report for the São Jose Dos Campos Urban Structuring Program, highlighting the harm communities felt related to the project's implementation of its resettlement program.

“

Sao Jose dos Campos
Urban Structuring
Program,
IDB MICI

MICI believes that the great uncertainty and insecurity felt by the Banhado residents regarding their future over the nine years the IDB was involved in the resettlement plans constitutes moral harm linked to the Bank's noncompliance. Also, the fact that some Banhado residents were resettled under local government housing programs, and not under the resettlement plan as foreseen, meant they were not given the opportunity to access the benefits and environmental and social protections of the IDB's Relevant Operational Policies, and so were not offered an informed choice of the resettlement package that best fit their needs.

MICI had found that “living conditions in Banhado deteriorated over the nine years of the IDB's involvement in the resettlement.” But instead of properly implementing the resettlement program according to IDB policies, the IDB informed the community that it was no longer financing the project, thereby washing its hands of any responsibility for providing further relief.

We noted above the recommendation that banks should have a remedy framework in place. But this must be complemented by an independent mandate for

IAMs to leave communities better off, or at least not worse off, after concluding a compliance investigation finding non-compliance or a signed mediated agreement. A clear remedy mandate is necessary for the IAM to push for recommendations commensurate with the harm they find, including to resolve long-term structural issues that cannot be addressed by an early exit from either the Bank or the client. This type of mandate, supported by sufficient financial and staffing resources, would strengthen IAMs' ability to monitor the full implementation of commitments. It would also empower IAMs to make recommendations for Management to use its considerable leverage with clients when a client has caused harm, e.g., conditioning or canceling a project or funding or blacklisting a client from receiving future funds.

Banks should take the following actions to ensure IAMs can fulfill their role effectively and efficiently:

1. **Expand IAM Mandates to Include Remedy Oversight**

Many IAMs are limited to diagnosing problems without having a clear mandate to ensure solutions. Banks should revise IAM mandates to explicitly include remedy implementation and monitoring, including for cases where Management tacitly acknowledges harm (such as through DR agreements) without a formal finding.

2. **Provide IAMs with Dedicated Resources for Remedy-Focused Follow-Up**

IAMs must be resourced not only for investigations but for ongoing, in-depth engagement during remedy implementation and monitoring. This includes staffing with technical and social experts, a flexible budget to commission independent assessments, and logistical capacity to conduct site visits and follow-up meetings with affected communities. IAMs must also have the latitude to extend monitoring timelines to full cover the breadth of commitment implementation.

3. **Safeguard IAM Independence to Ensure Credible Remedy**

Remedy cannot be impactful if communities perceive IAMs as compromised. IAMs must have operational independence from Bank Management, including autonomous control over decisions, budgets, and public communications. This builds trust and ensures that recommendations are driven by community harm — not institutional politics.

4. **Equip IAMs with Enforcement and Escalation Tools**

IAMs need concrete mechanisms to ensure timely and adequate implementation of remedy, including authority to trigger internal accountability processes (e.g., high-level reviews, Board briefings) when commitments stall or fall short. This helps ensure that remedy is not just proposed, but acted upon and tracked.

5. **Embed Community Relationships into IAM Operations**

To design remedy that is appropriate and grounded, IAMs must maintain consistent engagement with affected communities throughout the lifecycle of a complaint. IAMs should be supported to offer sufficient translation, travel, and communication tools to allow for two-way dialogue, co-design of remedial actions, and participatory monitoring. Banks must also create a culture of accountability among its staff that actively promotes an understanding of why independent accountability/oversight is necessary to their work, and develop incentive structures and resources on how to engage with accountability mechanisms that lead to beneficial outcomes for their projects.

3. **Include communities in implementation and monitoring**

Several systematic problems during the implementation and monitoring phase lead to harm never being fully addressed. Some of these issues include a lack of monitoring and communication with affected communities which often leads to significant delays, and unfair distribution of benefits from land and resettlement agreements.

To address these issues we recommend banks take the following actions:

- **Fully and punctually complete all commitments.** All commitments made following a dispute resolution or compliance review process should be tracked through completion. In the case of compliance review, Bank management should be encouraged to develop commitments to address each recommendation in a compliance report, and required to implement all MAP commitments, or provide a sufficient justification for why a commitment must be canceled or remain incomplete. In such cases, the Bank and/or its client should find an alternative commitment to address the harm the original commitment was meant to remedy in consultation with the affected community, and provide interim relief while the alternative is being planned and implemented.
- **Engage in participatory monitoring.** Management should include communities in the monitoring process so that communities have a say in how commitments are implemented and are kept informed of the status of commitments. This will also allow communities to be mobilized and involved where their participation and know-how is particularly helpful in sustainable implementation.

4. Enforce consequences for non-implementation of commitments

Complaint processes often suffer from a total lack of consequences for any unfulfilled commitments at the close of monitoring. More transparency on the status of implementation, and meaningful accountability when remedial actions are delayed or abandoned, would significantly strengthen the reliability, efficacy, and perception of complaint processes and their anticipated remedy.

- **Provide regular updates on implementation of commitments.**
Management should provide regular and standardized updates to IAMs and affected communities on implementation of all agreed-upon commitments until they are fully implemented.
- **Enforce accountability for non-implementation of remedial actions.** If the Bank and/or its client does not complete its commitments stemming from IAM processes, there should be consequences for non-implementation, e.g., suspending further funds to the client, possibly blacklisting the client, or a triggered accountability meeting before the Board of Directors.
- **Closely monitor distribution of remedy funds/compensation.**
Management should ensure any remedy funds or compensation are tracked and received by the affected communities. For land and resettlement agreements, Management should closely monitor the process to ensure that all affected individuals are identified and that similarly affected individuals receive fair and equitable compensation. Cash compensation should be indexed for inflation to ensure a consistent value in case of delays.



In 2011, Machimar Adhikar Sangharsh Sangathan, the Association for the Struggle for Fishworkers' Rights, filed a complaint about IFC's investment in the Tata Mundra coal-fired power plant, citing pollution, environmental damage, and livelihood impacts. The CAO validated many of their concerns, but after the client repaid its loan, the IFC failed to completely address the harm.

5. Outcomes of IAM processes should be included in net impact evaluation of projects and development effectiveness assessments

For remedy to be truly impactful, the findings and outcomes of IAM processes must be recognized and integrated into how Banks evaluate project success. When project evaluations ignore harm or treat remedial efforts as peripheral to development outcomes, they are positioning themselves to repeat similar cycles of harm in future projects. To address this, banks should:

- **Embed IAM Findings in Net Impact Assessments**

Any harm identified through IAMs should be incorporated into the Bank's final assessment of a project's outcomes. Final project evaluations should also include a dedicated section on IAM involvement and the status of any remedy provided. This ensures that harm is not erased by narrow definitions of success, and that remedy becomes a core part of how development performance is measured.

- **Treat Remedy Completion as a Performance Benchmark**

Transparency about the presence and implementation of remedy sends a powerful signal about the institution's commitment to responsibility and learning. Where IAMs recommend or facilitate remedy, evaluations should assess whether those remedies were fully and appropriately implemented. Projects with unremediated harm should be downgraded in final evaluations, even if economic or infrastructure goals were met.

- **Use IAM Data to Improve Remedy Design Across Portfolios**

IAMs have a wealth of insight into why harm happens and what communities need. Systematically integrating complaint outcomes into institutional learning processes — such as safeguard reviews, sector guidance, or risk management tools — will reduce the need for remedial action and lead to more appropriate remedies when required.

Recommendations for IAMs

6. Improve monitoring of implementation of commitments

Both Banks and IAMs must dedicate more resources to active and engaged monitoring of the implementation of commitments. The World Bank Inspection Panel, for example, does not even have a mandate to independently monitor commitments made by Management. The EIB Complaints Mechanism only publishes monitoring updates for Compliance Review cases at the very end of the monitoring period. Robust monitoring is a crucial step of the complaints process with significant impacts on the likelihood that promises on paper become a reality. To fulfill this responsibility, we recommend IAMs take the following steps:

- **Dedicate specific resources to active and engaged monitoring.** This requires first that an IAM have a strong independent monitoring mandate that allows them to monitor the implementation of all commitments until they are completed. This should not be a box-ticking exercise, nor can it simply be a posture of passively receiving information that parties share with the mechanism. Active and engaged monitoring requires regular communication with all parties involved, including the affected community, Management, and the Bank's client. Where there are discrepancies in perspective or disputes about the implementation of a commitment, the IAM plays a vital role in clarifying a path forward that is accepted by all parties. Some IAMs already have a practice of convening regular monitoring meetings and publishing periodic monitoring updates with perspectives from all parties.
- **Enforce consequences for non-implementation of commitments.** IAMs should be empowered with tools to enforce consequences for unjustified non-implementation of commitments. As mentioned above, if a Bank client fails to complete commitments to resolve harm to communities, the IAM should be able to recommend suspending further funds to the client and possibly adding them to a blacklist. IAM staff should also have sufficient access and authority with the Board of Directors to demand bank action. Direct and systematized input into project evaluation systems at the bank would also help ensure stronger compliance and more engagement on the fulfillment of promises made.

Women impacted by a proposal to expand the airport in Phnom Pehn, Cambodia reflect on their struggle with AC staff. In 2013, with the support of Equitable Cambodia, impacted community members filed a complaint to the IFC Compliance Advisor/Ombudsman and successfully negotiated to change the project to prevent their displacement.



- **Conduct participatory monitoring with communities and, where needed, involve third-party verification.** IAMs should aim to directly involve communities in the monitoring process wherever possible. Community members will often be able to spot problems ahead of implementation if they are part of the monitoring process from the beginning, and can provide valuable insights into community needs, special considerations for vulnerable populations, issues with local terrain, and issues that may arise with local government administrators. For the same reasons, communities can be valuable partners in troubleshooting problems that often arise during the implementation process. Participatory monitoring has the added benefit of keeping the community informed and invested throughout the process.

When there is high likelihood for discrepancy, misinformation, or frustration, we recommend that IAMs consider using third-party verifiers to ensure these processes are fair, equitable, and protected from corruption. This is particularly important for payouts of compensation. In 6 out of 17 compliance review interviews, complainants raised that compensation commitments for land, livelihoods, or other losses were often promised but not delivered, delayed, inadequate or denied. Recipients highlighted discrepancies in payout amounts, corruption, and a “one-size-fits-all” approach that didn’t consider differences in land sizes or family needs. In situations like these, a trusted third party can both improve remedy performance and reduce community mistrust.

- **Reduce timelines.** Communities repeatedly expressed frustration with lengthy IAM processes, some of which spanned a decade or more. IAMs should adequately resource cases to ensure they meet their own internal

timelines for resolving cases. While flexibility is important, IAMs should consider tighter timelines for lengthy compliance or negotiation processes. We acknowledge IAMs have not had sufficient resources, including staff time, to meet these deadlines, and it is incumbent on Banks to ensure that such constraints are remediated.

IAMs should set clear and enforceable deadlines for the resolution of issues. They should incorporate accountability measures for all parties to meet these deadlines, such as notifying the Board if important deadlines are not met and allowing only limited extensions of deadlines for good cause.

- **IAM recommendations should be concrete, detailed, timebound, and measurable.** Remedy commitments should clearly specify what will be done, by whom, within what timeframe, and how progress will be measured. This includes identifying specific actions, setting deadlines for each step of implementation, defining responsible actors at both the Bank and client levels, securing the requisite funding, and articulating the indicators that will be used to assess completion. IAMs should treat the quality of these commitments as integral to the monitoring process itself, rejecting vague or aspirational language in favor of enforceable obligations. Where necessary, IAMs should push back against management responses or action plans that lack specificity or realism, and instead support affected communities in advocating for agreements that can realistically be implemented, and effectively measured.



Complainants who filed a grievance regarding the Shuakhevi Hydropower Project financed by EBRD, ADB and IFC in 2018 and claimed the project was harming the environment, intensifying landslides, creating unsafe conditions for locals, and polluting the water. Eight years after filing the complaint, they were not aware that the complaint had resulted in findings of non-compliance and was in a monitoring stage.

7. Address power imbalances, particularly around retaliation risks

In many complaints, communities face significant barriers to participating safely and equitably. These include threats of retaliation, deep power asymmetries, lack of access to information, and cultural mismatches in how IAMs engage with affected people. If left unaddressed, these issues can distort outcomes, silence voices, and undermine the legitimacy and effectiveness of any remedy offered. To close these critical gaps, IAMs should implement the following:

Implement Robust Anti-Retaliation Measures

IAMs as well as banks should adopt clear, transparent, and well-communicated policies for preventing and responding to retaliation against complainants, community members, and civil society organizations (CSOs). This requires regular assessments before and during the complaint process of potential risks to participants, in order to adapt processes accordingly. IAMs must ensure that targeted communities can raise concerns privately and securely, and should coordinate with Banks to ensure that any retaliation leads to swift and serious institutional responses, including intervention with clients or suspension of activities if necessary.

Empower Communities to Navigate the Process

Many communities told us they felt overwhelmed or disoriented by the technical language and procedural complexity of IAM processes. IAMs should provide orientation materials in local languages, offer repeated and culturally grounded explanations of how the process works, and where possible, engage trusted civil society organizations to help communities understand their rights and responsibilities. All key documents—such as agreements, updates, and technical assessments—should be translated into accessible formats, in local languages and through communication modalities that will be easily comprehensible.

Design Power-Aware Processes

IAMs must take deliberate steps to rebalance power within the process design itself. Mediators, consultants, and evaluators should not be unilaterally selected by IAMs or the Bank; rather, affected communities should be offered meaningful input or consent in the selection of third-party actors, particularly in contexts where these roles hold significant influence over remedy outcomes. This also requires IAMs to pay experts and consultants directly, rather than relying on banks to fund third parties who may be investigating their wrongdoing. IAMs should actively guard against client interference in the selection

of community representatives or facilitators, and develop protocols to ensure the process remains free from undue pressure or manipulation. To support meaningful engagement, IAMs should maintain a roster of independent experts trained in translating technical materials for non-specialist audiences, ensuring that communities can make informed contributions to the design and evaluation of remedy.

Design Inclusive and Grounded Engagements

IAMs should ensure that their field operations and deliberations are physically, socially, and culturally accessible. Meetings should be held within or near affected communities rather than in distant or intimidating urban locations. Particular care should be taken to ensure that marginalized groups—such as Indigenous peoples, women, youth, disabled persons, displaced persons—are not only consulted but meaningfully included in designing, negotiating, and monitoring remedy. IAMs must respect Free, Prior and Informed Consent (FPIC) principles and align their practices with international human rights norms, including respecting culturally specific ways of resolving conflict and building consensus.



Workers for the U.S. OPIC-financed Buchanan Renewables project experienced wage theft, inadequate provision of protective equipment, workplace injuries, and racial discrimination. Today, workers continue to demand remedy from OPIC's successor, the DFC, after OPIC's Accountability Office acknowledged harm but took no further steps to remedy that harm.

8. Improve reporting of data: measure what's important

When publishing case metrics on a systemic level, IAMs largely focus on procedural outputs (how many cases were eligible, how many achieved an agreement or compliance report, etc) and forego reporting on arguably one of the most important metrics of interest: whether stakeholders achieved changes needed to resolve complainant concerns. We hope that this research has highlighted opportunities for shared learning and growth that can come from systematic tracking and publishing on outcomes (rather than simply outputs) of cases.

For communities who risk much and invest a great deal in these processes, transparent and public monitoring of commitments is an essential component of remedying harm. For any communities thinking about filing complaints to an IAM, it's critical to understand what they can realistically hope to achieve from the process, and what their likelihood is of achieving it. This is information that can be made available to communities if it is organized and tracked in a public and systematic way.

As a starting point, we recommend that IAMs track all commitments and the status of commitments resulting from any mediated agreement or compliance review. IAMs are welcome to build off our data as a baseline. We also advise including a community input component to understand if communities feel they are better off because of the interventions made.

Although not the focus of this report, we also recommend that IAMs improve their complaint registries in general to allow the public, especially those who might be interested in filing a complaint, to easily understand how complaints fare at each stage of the IAM process. We have seen some significant improvements in complaint registries recently, including for CAO, MICI, IPAM, and EIB-CM. The IAMs' Data Standardization Working Group is a fantastic step forward in this direction.



Conclusion

This report set out to answer a fundamental question: are Independent Accountability Mechanisms (IAMs) delivering meaningful remedy to communities harmed by development bank-financed projects? The answer, as revealed through extensive quantitative and qualitative research, is layered and complex. IAMs can deliver remedy, and in some cases, do so in ways that are creative, responsive, and transformative. But these successes are the exception, not the rule. Across the 2,270 complaints analyzed, only a small fraction resulted in verifiable commitments, and fewer still achieved full implementation. Even when promises were made, communities often bore the burden of navigating opaque, slow, and frequently disempowering systems to see those promises fulfilled.

The gaps are not incidental; they are systemic. Delays, cancellations, poor monitoring, inequitable distribution of remedy, and a profound lack of attention to power imbalances, particularly the risks of retaliation, are recurring themes. These failures are not just procedural; they represent missed opportunities for redress, justice, and trust-building. For many communities, the IAM process itself became an extension of harm: emotionally taxing, disillusioning, and in some cases, retraumatizing.

In spite of this harm, most interviewees said that even though harm from projects was not fully remediated, they would nevertheless make the same choice to engage in an IAM process. This speaks to a dearth of alternatives and the importance of these mechanisms in community struggles for accountability.

Yet amid these sobering findings, there is also hope. IAM staff have demonstrated the potential to produce outcomes that are tailored, participatory, and anchored in community-defined visions of justice, despite significant institutional constraints. These moments show what could be possible when mechanisms are empowered with the right mandates, adequately resourced, and held accountable to the people they are meant to serve. Civil society organizations play an essential bridging role in helping communities achieve this potential, but exceptional individual staff members and external NGO support cannot substitute for institutional commitment or structural reform.

The time is also ripe to earnestly discuss the next generation of IAMs that are empowered to make binding recommendations¹⁹ and IAMs whose independence and mandate is no longer the subject of bureaucratic fights.²⁰ To move forward, both development banks and their accountability mechanisms must reconceive their understanding of remedy; not as an ancillary output, but as a

19. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5118727.

20. <https://digitalcommons.wcl.american.edu/accountability-perspectives/19/>.

core development obligation that is as essential as environmental assessments or loan disbursements. Remedy must be tracked, resourced, and institutionalized, with communities at the center. Only then can IAMs fully deliver on their promise: not just to respond to harm, but to help prevent it. Not just to provide process, but to deliver justice.

This report serves as both a mirror and a map: a reflection of the current landscape, and a direction for where to go next. The choice lies with the institutions and individuals who hold power. Remedy is not charity. It is an obligation. It is a reparation. And it is long overdue.



Herders in Mongolia filed a complaint about IFC's investment in the Oyu Tolgoi mine in 2012. The CAO facilitated a negotiation with far-reaching agreements around livelihood restoration and environmental monitoring, which continues to be monitored locally.



Communities impacted by the Khimti-Dhalkebar Transmission Line, funded by the World Bank, expressed disappointment in the implementation of commitments, as Bank Management relied on reports by the very client that was accused of not consulting with communities and using violent repression against dissent.

Appendix A: Acknowledgements

Communities and Civil Society Organizations (CSOs):

First and foremost, we extend our deepest gratitude to the communities who shared their time, experiences, and perspectives with us. Their willingness to speak candidly about both the promises and limitations of Independent Accountability Mechanisms (IAMs) forms the foundation of this research. We also acknowledge the civil society organizations that played a vital role in facilitating these conversations, often at personal and organizational risk, and who continue to stand alongside communities in their struggles for justice.

Independent Accountability Mechanisms (IAMs):

We thank the IAMs who provided data and insight, and whose staff helped clarify procedures, share documentation, and offer context to support accurate analysis. While our findings are critical of many aspects of IAM practice, we recognize and appreciate the commitment of those staff who work tirelessly within institutional constraints to secure better outcomes for affected people.



Liberian farmers, charcoalers, and workers filed a complaint about U.S. OPIC's funding of a biomass company that caused serious human rights, labor, and environmental abuses, including sexual abuses by company employees of local women. The company responsible for the abuses failed and sold off its assets. The complaint won positive policy changes, but remedy for those harmed remained elusive.

International Advocates Working Group (IAWG):

We also wish to acknowledge with gratitude the many organizations from the International Advocates Working Group who contributed critical information, context, and connections throughout this research. Their expertise deepened our understanding of IAM practice across regions and institutions, while their networks helped us reach more diverse voices and secure interviews that would otherwise have been inaccessible. This collaboration strengthened our data, enriched our case studies, and sharpened our analysis, ultimately making this report a more accurate reflection of the lived realities of communities navigating IAM processes.

Researchers, Partners, and Colleagues:

Finally, we thank the broader community of researchers, advocates, and colleagues who reviewed early drafts, shared feedback, and challenged us to refine our methodology and conclusions. Their engagement has been invaluable in ensuring this work is both rigorous and relevant.

This report is the product of many hands and voices. While we take responsibility for its findings and analysis, we recognize that it reflects the collective contributions of communities, CSOs, IAM staff, and international advocates who share a commitment to accountability, justice, and remedy.

Appendix B: Interviews

Complaint Name	IAM	Country	Substantive Stages	# of Interviews
Visayas Base-Load Power Project	ADB CRP	Phillipines	Compliance Review	1
Construction of the Marrakech — Agadir Motorway	AfDB IRM	Morocco	Dispute Resolution	1
Sendou / 16-01 & 16-02	DEG/FMO/ PR IRM	Senegal	Compliance Review	3
Turk Traktor	EBRD IPAM	Turkey	Compliance Review	1
Lydian (Amulsar Gold Mine)	EBRD PCM	Armenia		1
Nenskra HPP	EBRD PCM	Georgia	Compliance Review	1
Shuakhevi HPP	EBRD PCM	Georgia	Compliance Review	1
Boskov Most Hydro Power	EBRD PCM	Macedonia	Compliance Review	1
Bangalore Metro Rail Project Line R6	EIB CM	India	Dispute Resolution	1
Productive and Tourism Infrastructure Program for the Province of Rio Negro	IDB MICI	Argentina	Dispute Resolution	1
Sao Jose dos Campos Urban Structuring Program	IDB MICI	Brazil	Dispute Resolute, Compliance Review	3
Reventazon Hydroelectric Power Project	IDB MICI	Costa Rica	Dispute Resolution	1

Program for the Reconstruction of Electricity Infrastructure in Areas Affected by the Earthquake in Ecuador	IDB MICI	Ecuador	Dispute Resolution	1
Mareña Renovables Wind Project	IDB MICI	Mexico	Compliance Review	1
Cambodia Airports-01/Phnom Penh	IFC CAO	Cambodia	Dispute Resolution	6
Wilmar Group-03/Jambi	IFC CAO	Indonesia	Dispute Resolution, Compliance Review	2
Zalagh	IFC CAO	Morocco	Dispute Resolution	2
Ingenio Montelimar-01/ Montelimar Environs	IFC CAO	Nicaragua	Dispute Resolution	1
Indorama Kokand, Indorama Kokand	IFC CAO	Uzbekistan	Dispute Resolution	1
Buchanan Renewables Biomass	OPIC OA	Liberia	Compliance Review	5
Electricity Expansion Project	WB IP	Kenya	Compliance Review	4
Power Development Project	WB IP	Nepal	Compliance Review	2
Third Power Project, Fourth Power Project, and proposed Bujagali Hydropower Project	WB IP	Uganda	Compliance Review	2
Transport Sector Development Project — Additional Financing	WB IP	Uganda	Compliance Review	1
Second Rural Enterprise Support Project	WB IP	Uzbekistan		1

Appendix C: Commitment Categories

Category	Type/Subcategory	Definitions for data input
Satisfaction	Apology	An apology from project implementer or other project stakeholders to project-affected people for wrongdoing and/or harm caused
Compensation	Cash	Monetary compensation given to project-affected people for a damage or loss suffered
Compensation	Land	Land or real property given to project-affected people for a damage or loss suffered
Compensation	Collective Compensation	Compensation intended for the entire community, can be cash or other forms of support. This is a broad category that can encompass different types of support.
Compensation	Other	Other forms of material repayment to project-affected people for a damage or loss suffered
Project-Level Grievance Mechanism	Project-Level Grievance Mechanism	Establishment or improvement of a local grievance mechanism where project-affected people can raise concerns about the project
Consultation & Disclosure	FPIC	Provision of the right to free prior and informed consent to project-affected indigenous groups. This category also includes the application of other indigenous-specific consultation processes that some banks substitute for FPIC (i.e. free prior and informed consultation)
Consultation & Disclosure	Consultation (non-FPIC)	Consultations with project-affected people about a project's design, risks and impacts, mitigation measures, resettlement measures, etc.

Consultation & Disclosure	Information disclosure	Distribution of information to project-affected people and civil society organizations, especially about the project's design, risks and impacts, mitigation measures, resettlement measures, etc.
Consultation & Disclosure	Studies (not environmental)	Assessments to further investigate the social impact of operations
Cultural Heritage	Cultural Heritage	Measures to protect or restore cultural heritage or to honor lost cultural heritage
Environmental	Environmental protection	Measures to prevent or mitigate against future environmental harm
Environmental	Environmental studies	Studies to further investigate environmental impacts
Environmental	Environmental remediation	Actions designed to return environmental spaces to their pre-project status (addressing pollution that has already occurred)
Livelihoods	Job Training	The receiving of job training or enrollment in job training programs
Livelihoods	Employment Opportunities	The receiving of an employment opportunity; this can include employment with the project or business operations or with a third-party organization
Livelihoods	Other	Other measures that support affected people to improve their livelihoods, including measures to increase income earned from their livelihoods and measures to establish new livelihoods
Livelihoods	Agriculture	Measures to support agricultural livelihoods such as grazing land, support for livestock, new agricultural equipment, maintenance of agricultural equipment, etc.

Monitoring	Monitoring project impacts	Measures to monitor project impacts, such as water monitoring or other environmental monitoring programs
Monitoring	Monitoring remedies	Measures to monitor the implementation and effectiveness of remedy measures (i.e. compensation / resettlement measures, livelihoods support measures, etc.).
Other	Other	Any outcome that does not fit into another category
Operations Management	Policy Change	A change in the language of a particular bank or IAM policy
Operations Management	Process Change	A change in guidance documents, project implementation strategy, or other sub-policy expectations to ensure greater compliance with bank policy
Operations Management	Guidance Notes/Manuals	Creation of or changes to existing guidance notes and manuals for bank and project staff aimed to clarify policy and implementation guidelines for future use
Operations Management	Employee Trainings	Initiate employee trainings to better handle the implementation of bank/project policies and increase employee knowledge of mitigation measures. Can include hiring a specialized employee to handle particular aspects of project implementation
Project Changes	Other project changes	I.e. a commitment to re-design a project
Project Changes	Temporary suspension	The suspension of project implementation or business operations for a temporary period (i.e. for the duration of an investigation, dialogue process, or monitoring process until an agreement or remedy has been reached)

Project Changes	Reduction	The reduction of project or business operations scope or activities in response to violations of rights or bank policy
Project Changes	Cancelation	The full cancelation of a project or business operations in response to violations of rights or bank policy
Project Changes	Client Operational Changes	Actions in which the receiver of the action is the client or implementor of the project rather than the community. example, update to client E&S management systems
Social Support	Education	Increased access to education including repairs to/new building of educational facilities and enrollment of project-affected people in an educational program; differentiated from job training by receiving a general education or participating in an education program that does not accumulate in a singular, specific job skill
Social Support	Health	Increased access to general health care needs or direct attention from a specific health care professional
Social Support	Infrastructure	Infrastructure enhancement, such as paved roadways or improved utility access; this can be provided by employees of the project/business operations or contracted to a third party
Social Support	Microfinance	Measures that facilitate access to microcredit/microfinance opportunities for project-affected people
Social Support	Water	Measures to improve or ensure access to water for project-affected people; differentiated from measures to address water pollution which would go under environmental protection

Social Support	Capacity Building	Measures to improve community capacity. This is typically skill-building through trainings, workshops, coaching, mentoring, etc. in areas of social support such as the establishment of community collectives, trainings and awareness campaigns, transferring implementation of an action item to the community with bank resource support, micro loans, other social support initiatives
Social Support	Housing	Housing enhancements including building new homes, repairs to damaged homes, bathroom installations, and other upgrades to housing amenities and functions
Social Support	Sanitation	Measures to increase sanitation related infrastructure and community environment. Includes construction/maintenance of drains and septic tank installation
Social Support	Community Safety	Measures to increase community safety from project activities, such as emergency action plans that include community evacuations or process changes to avoid causing community harm
Social Support	Community Development Funds	Development Funds established by borrower or IAM for community development; community often has a role in deciding which projects/ activities the funds will be used for
Social Support	Other	Other measures that support affected communities. Examples include the building of recreational spaces, donations, and food aid. Excludes livelihood and compensation related commitments

Labor	Employment conditions	Changes to employment conditions at the project level: Workplace health and safety measures; fair and ethical working conditions (hours, elimination of child labor); fair pay; changes to collective bargaining, freedom of association
Labor	Workers' compensation	Provision of compensation for workplace injuries
Rights Recognition	Rights Recognition	Acknowledgement of rights, to the community or individual members. This can include the recognition of land rights for areas traditionally used and maintained by the community
Unknown	Unknown	There is not enough information available to select a category for the commitment
Resettlement	Resettlement	Commitment to establish a Resettlement Action Plan (RAP) or general resettlement commitment separate from individual land compensation as an action of resettlement

Appendix D: Data

Overview

This appendix presents the underlying quantitative analysis supporting this report’s findings. It draws from **2,147 closed complaints** filed to 16 Independent Accountability Mechanisms (IAMs) from 1994 through 2022, and **1,758 tracked commitments** made by development banks or their clients.

The dataset combines information from IAM annual reports, complaint registries, dispute resolution agreements, management action plans, and monitoring reports, supplemented by research and coding of publicly available documents. The full dataset is available at www.accountabilityconsole.com.

Data Snapshot

Total complaints analyzed	2,147	Total commitments tracked	1,758
Complaints with commitments	280	Completed commitments	900
Share of complaints with commitments	13%	Commitment completion rate	51.2%

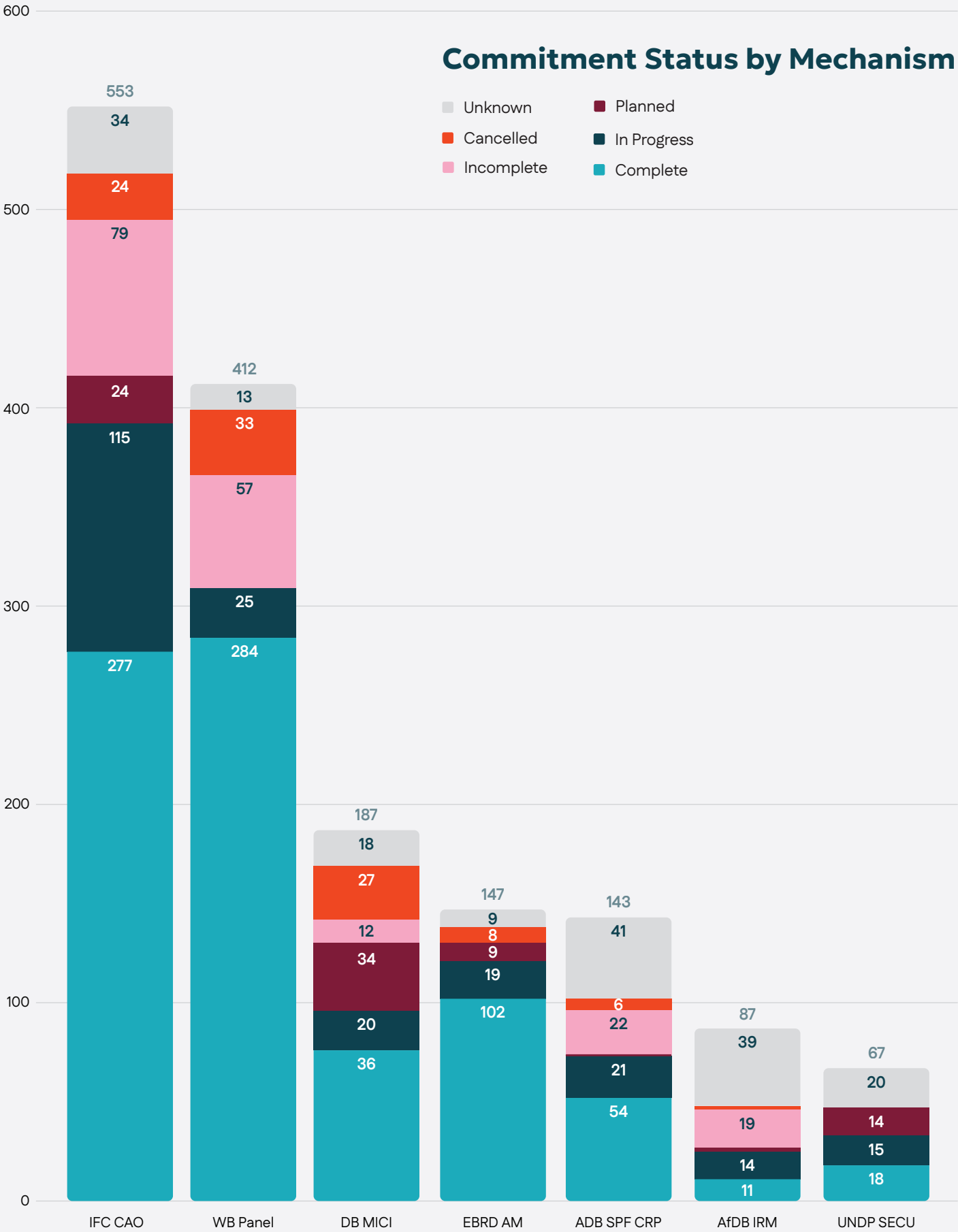


Haitian farmers displaced from their land by an IDB-funded industrial development park won significant livelihood restoration commitments through a MICI-mediated dialogue process. By 2025, more than 50 families received replacement land, and hundreds more received small business training, farming equipment, or vocational training.

IAM-Level Outcomes

IAM	Total Commitments	Completed	In Progress/ Planned	Cancelled	Incomplete	Unknown
IFC CAO	553	277	139	24	79	34
WB Panel	412	284	25	33	57	13
IDB MICI	185	76	53	27	12	17
EBRD IPAM/ PCM/IRM	147	102	28	8		9
ADB SPF CRP	143	52	22	6	22	41
EIB CM*	109	69	11	2	8	19
AfDB IRM	87	11	16	2	19	39
UNDP SRM SECU	67	18	29	0		20
DEG/FMO/ PR ICM	21	5	14	0	2	0

* Excluded from analysis above

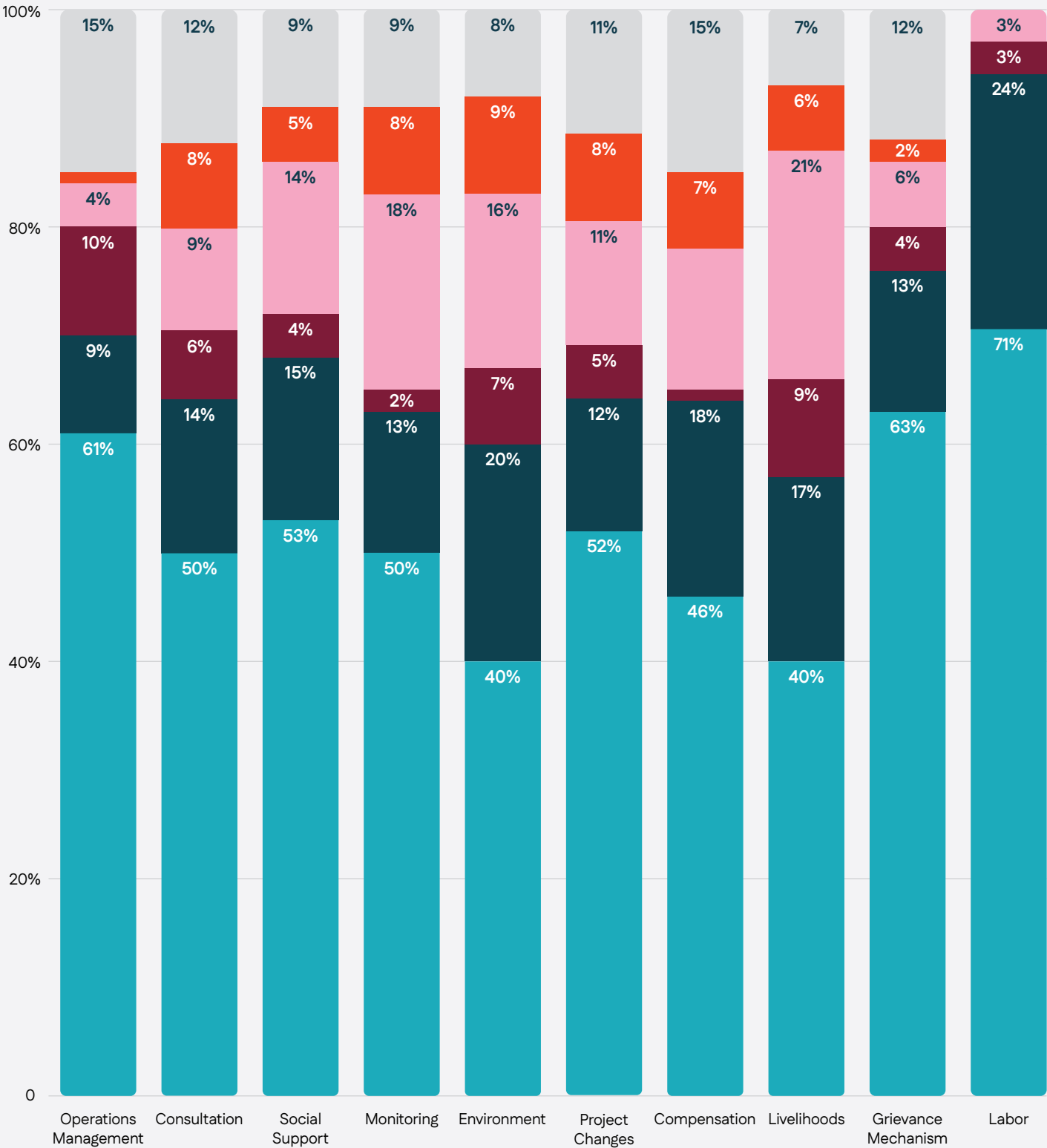


Commitment Categories

Category	Total Commitments	Completed	Completion Rate
Operations Management	331	203	61%
Consultation	318	159	50%
Social Support	286	151	53%
Monitoring	175	87	50%
Environment	136	55	40%
Project Changes	123	64	52%
Compensation	115	53	46%
Livelihoods	86	34	40%
Grievance Mechanism	52	33	63%
Labor	34	24	71%
Unknown	32	2	6%
Cultural Heritage	29	13	45%
Resettlement	18	9	50%
Rights Recognition	10	6	60%
Other	7	3	43%
Satisfaction	4	4	100%

Commitment Status by Category

- Unknown
- Cancelled
- Incomplete
- Planned
- In Progress
- Complete



Regional Outcomes

Region	Complaints with Commitments	Commitments	Completed	Completion Rate
Sub-Saharan Africa	75	509	270	53%
Latin America and the Caribbean	69	392	219	56%
Europe and Central Asia	59	331	200	60%
South Asia	30	244	106	43%
East Asia and the Pacific	28	221	78	35%
Middle East and North Africa	16	51	21	41%

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