IRM
Independent Review Mechanism

The Independent Review Mechanism

ANNUAL REPORT 2008







Compliance Review and Mediation Unit
of the African Development Bank

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IRM provides people with the right to complain to the African Development Bank in case they suffer harm as a result of violation of the Bank Group's policies and procedures

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Executive Summary

This is the third annual report of the Independent Review Mechanism (IRM) which details the activities of the mechanism in 2008.

The IRM became effective in 2006. However, 2008 is the first year when it has operated in its full capacity, with the initially proposed staff positions in place and the involvement of the members of the IRM Roster of Experts, duly appointed by the African Development Bank (ADB) Group's Boards of Directors in 2007. That allowed the Compliance Review and Mediation Unit (CRMU) to pursue more rigorous efforts with regard to compliance review and outreach activities.

During 2008, the IRM completed its first independent compliance review of the Bujagali Hydropower and Interconnection projects in Uganda. The related complaint was received by CRMU from several Ugandan NGOs and individuals in May 2007. A compliance review panel investigated the complaint during 2007- 2008, and presented its report with findings and recommendations to the Bank Group's Boards of Directors in July 2008. The Boards of Directors requested the Bank's management to prepare an action plan for the implementation of these findings and recommendations. The management's action plan is expected to be available for discussion and subsequent approval by the Boards of Directors in the first quarter of 2009.

In 2008, CRMU conducted a number of outreach activities in seven regional member countries of the Bank Group; in addition to several internal meetings for the Bank's staff at the Temporary Relocation Agency in Tunis and in the field offices. CRMU further developed and improved the IRM information materials. As a result, the IRM brochure is now available in five languages: English, French, Arabic, Portuguese and Kiswahili. We have also prepared an Information Kit, using simplified language and cartoons, to sensitize local communities on the IRM. Since June 2008, we have begun to distribute a quarterly electronic newsletter by which CRMU informs civil society organizations and other interested parties about the mechanism's activities. The newsletter helps CRMU to maintain its contact with people and organizations who have participated in its workshops, It also provides a space for civil society organizations to express their views on accountability and other IRM specific issues.

The IRM's newsletter and website (www.afdb.org/irm) are among the principal communication tools for CRMU to reach out to civil society organizations and the public at large. Nonetheless, a considerable number of projects affected people, who are the potential beneficiaries of the IRM, have no access to internet and other electronic means of communication. Therefore, CRMU has opted to continue with its outreach through workshops and seminars for civil society organizations and community leaders in regional member countries of the Bank. In the coming years, CRMU plans to extend the outreach to directly sensitize local communities living in areas where the Bank is financing projects. It's only when project affected people are aware of their



entitlements under the Bank's policies and procedures, and their legitimate right to complain to the IRM in case they suffer harm as a result of violation of these policies, that the mechanism can be considered effective.

In June 2008, CRMU hosted the 5th Annual Meeting of the Principals of Independent Accountability Mechanisms (IAMs) of international and bilateral financing institutions. The meeting was attended by twenty-eight representatives of IAMs, including: the World Bank, International Finance Coopertaion (IFC), Asian

Development Bank, European Investment Bank, European Bank for Reconstruction and Development, Inter-American Development Bank, Overseas Private Investment Corporation (OPIC) of USA, Japan Bank for International Cooperation (JBIC), Nippon Export Investment Insurance (NEXI, Japan), and the African Development Bank. The purpose of the IAMs annual meetings is to provide the different accountability mechanisms with an opportunity to discuss and learn from each others experiences and best practices on mediation and compliance reviews, as a way to improve their performance. For the 2008 annual meeting, a self-assessment framework, based on the criteria, *Accessibility, Credibility, Efficiency and Effectiveness* (ACEE), had been developed in order for each mechanism to assess its own performance. A common finding of this ACEE self-assessment is the need to improve the accessibility of the IAMs to communities affected by the projects financed by their respective institutions. It is perceived that facilitating such access could be addressed in two ways: raising awareness of the IAMs among different stakeholders and simplifying the requirements for submitting complaints.

At the end of the year, CRMU organized a seminar for the Bank Group's Boards of Directors on the IRM, and received a good guidance and support for its ongoing work program, including its outreach activities and plan to undertake the review of the IRM as scheduled in 2009. The review will assess the IRM's various activities, the adequacy of its present Operational Rules and Procedures, and, if found necessary, make recommendations on their amendment, ultimately to enhance the effectiveness of the mechanism.

General Information about the IRM

The Establishment Background

The IRM was established by the Bank Group Boards of Directors' Enabling Resolution of 30 June 2004. However, it only became operational in mid-2006 upon of the appointment of the first director of the CRMU to administer the mechanism. The IRM Operating Rules and Procedures were also prepared in 2004 and approved by the Boards of Directors on 27 July 2006. For the purpose of compliance reviews, an IRM Roster of Experts was established to comprise three external members, appointed by the Boards of Directors on non-renewable term of five years. As an exception, the present three Experts, who were appointed by the Boards in 2007, serve a different term, i.e., of three, four and five years.

The Mandate

The mandate of the IRM is to provide people who are, or likely to be, adversely affected by a project financed by the Bank Group as a result of violation of the Bank Group's policies and procedures with the possibility to request the Bank to comply with its own policies and procedures. The IRM is one of several accountability instruments established by the Bank Group to ensure accountability of its operations. However, the salient feature of the IRM is that it is independent from the Bank's management and operations, and only intervenes when project affected people or communities lodge a complaint to CRMU. In other words, the IRM is the last resort for people adversely affected by a project financed by the Bank Group to get their complaints handled and responded to by the highest decision levels of the Bank in case they could not manage to resolve their problems with the Bank's management and staff in the first place.

The Functions

The IRM has two main functions: Problem-Solving (mediation) and Compliance Review. CRMU is responsible for receiving and determining the eligibility of the complaints and undertaking problem-solving exercises. The Compliance Reviews are conducted by Panels, consisting two members of the IRM Roster of Experts and the director of CRMU. The Panel's review reports can make recommendations to the Bank Group's Management and the Boards of Directors on different respects including project specific remedies and how to bring the project back into compliance, as well as with regard to the Bank Group's policies and procedures. The IRM, subject to the Boards' authorization on a case by case basis, is also mandated to monitor the implementation of the findings and recommendations resulting either from a problem-solving exercise or a compliance review.

The IRM operates under a set of transparent and stringent procedures, especially those governing public disclosure of information. The rules mandate the dissemination of the reports and decisions resulting from either of the above-mentioned IRM functions. The transparency and the independence of the mechanism are considered as the guiding principles to ensure the credibility of the mechanism's processes.

The Procedures for Processing Requests

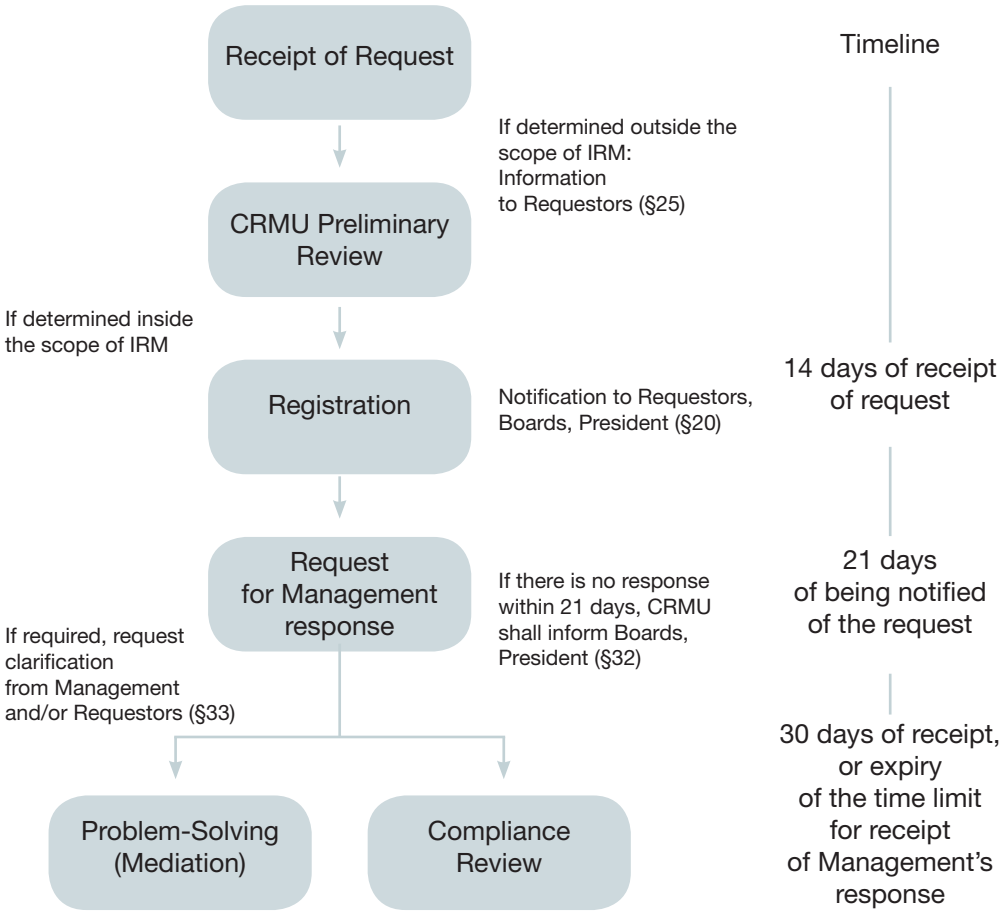
The IRM Operating Rules and Procedures, included in Annex I of this report, provide requirements for potential complainants on how to prepare and submit their requests to CRMU. They also contain provisions for CRMU on how to handle and process requests within specified periods of time which are illustrated in Box 1.

It is worth noting that within 14 working days of the receipt of a request, the director of CRMU shall have conducted a preliminary review to determine whether the request falls within the mandate of the IRM and whether it contains bona fide allegation of harm arising from a Bank Group financed operation. If the request is considered to be within the mandate of the IRM, CRMU shall register it and immediately inform the requestors, the President and the Boards of Directors. Within 21 working days of the notification of the request

to the Bank's Management, the latter shall provide CRMU with evidence on whether it has complied with, or intends to comply with the Bank Group's relevant policies and procedures to the project in question.

Within 30 days of receipt of the Management response, CRMU shall either start a problem-solving exercise, make recommendation whether to undertake a compliance review or reject the request.

Box 1: Processing of Requests for Problem-Solving or Compliance Review



The Problem-Solving (Mediation)

The purpose of the problem-solving or mediation exercise is to restore an effective dialogue between the requestors and any interested party with the view of resolving the issue or issues underlying the request.

When considering whether or not to undertake a problem-solving (mediation) exercise, the director of CRMU shall *inter alia* consider whether the parties are amenable to resolve the conflict through mediation without putting blame on any of the involved parties and whether the Bank Group has, or continues to have, sufficient leverage to influence change. Furthermore, the director also considers whether the problem-solving exercise will interfere with or be impeded by any other relevant process before a court, an arbitration tribunal or a similar review body before which the same matter or a matter closely related to the request is examined.

A variety of problem-solving processes and techniques may be used by CRMU such as independent fact findings, mediation, conciliation and dialogue facilitation. If a problem-solving exercise has not reached a satisfactory conclusion within three months, the director of CRMU will declare the exercise unsuccessful. Within 30 days of concluding the problem-solving exercise, the director shall submit a report to the interested parties, the Bank Group's President and the Boards of Directors explaining the process and the result of the exercise. Regardless of the outcome of the exercise, a compliance review can be warranted under the IRM rules. Accordingly, following the problem-solving exercise, the director of CRMU can recommend to the President or the Boards of Directors that a compliance review shall be undertaken to determine whether any of the Bank Group's policies and procedures has been violated.

The Compliance Review

The purpose of the compliance review is to determine whether the Bank Group has complied with its own policies and procedures and to verify whether as a result a direct harm has been, or likely to be, caused to the project affected people.

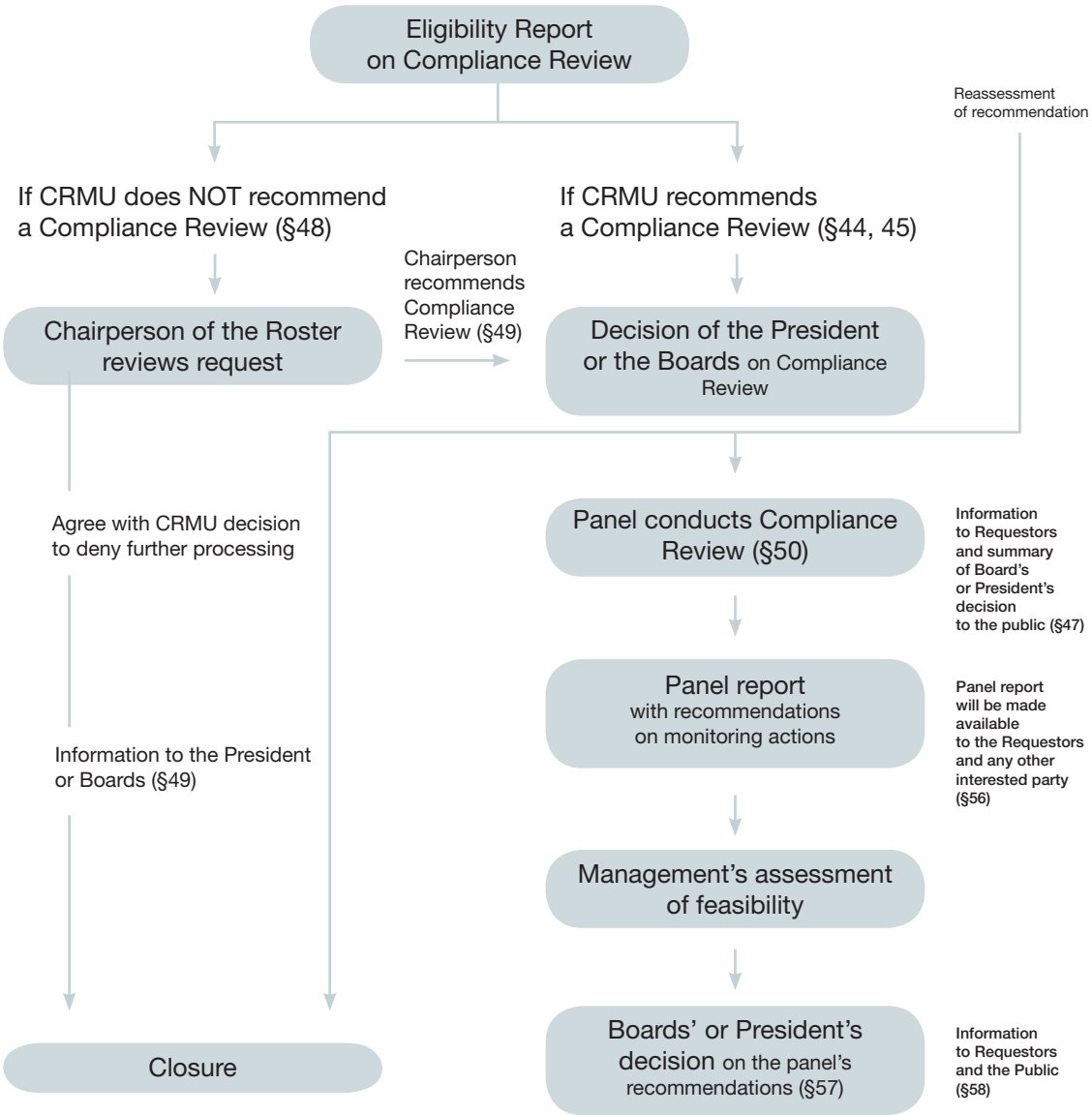
Generally, in determining the eligibility of requests, there are several steps. First, the director of CRMU will review the request and the corresponding response of the Bank management, and if found necessary, undertake a mission to the project area to verify the factual situation. On the basis of a *prima facie* evidence of non-compliance with the Bank's policies and possible harm to project affected people, the director shall prepare an eligibility report incorporating his recommendations to undertake a compliance review. On the other hand, if the director of CRMU does not recommend a compliance review, the chairperson of the Roster of Experts shall then review the request, reassess its eligibility, and write his/her independent recommendation. Second, the eligibility report prepared by the director or the chairperson will be decided upon by the President in case of projects under consideration for financing by the Bank Group, or the Boards of Directors for approved projects by the Boards. The requestors shall be immediately notified of the decision of the President or the Boards of Directors. The eligibility report (including the request and the response of the management of the Bank) together with the decision of the President or the Boards shall be promptly disclosed to the public on the Bank Group's website (www.afdb.org/irm).

Subject to the President's or the Boards' authorization, a compliance review shall be undertaken by a Review Panels comprising two members of the Roster of Experts and the director of CRMU. The director only has a vote when the other two member experts of the Panel disagree. After investigating the complaint, the Panel prepares a report inclu-

ding findings and recommendations which shall be distributed at the same time to the President, Boards of Directors and the Requesters. The President or the Boards of Directors, as the case may be, shall decide whether or not to accept the report. Their decision shall immediately be published on the Bank Group's website.

The diagram in Box 2 illustrates the steps of the aforementioned request eligibility assessment and compliance review.

Box2: Eligibility of Request and conduct of Compliance Review



Requests

IRM Register of Requests

The IRM Register of Requests shall include information about the requests received by the CRMU. The information is posted electronically on chronological order to update requestors and any other interested party on actions taken on the stance of the request, including statements of decisions made by the President or the Boards of Directors during the course of handling the complaint. The request is classified in the registry by its date of submission, and the name of the project(s) complained about, and the IRM function through which the request has been examined in case it is found eligible. The register is regularly updated and can be accessed at the Bank's Group website (www.afdb.org/irm).

Register of Requests (by 31 December 2008)

Request no. (date registered)	Country	Project	Status and Instrument
RQ2007/1 (16 May 2007)	Uganda	Bujagali Hydropower and Interconnection projects	Accepted for Compliance Review

Compliance Review Cases

RQ2007/1: Bujagali Hydropower and Interconnection Projects, Uganda

On 16 May 2007, CRMU received its first request from local NGOs and individuals for a compliance review of both the Bujagali Hydropower and the Bujagali Interconnection projects in Uganda. The request alleged non-compliances with the Bank Group's policies *inter alia* applicable to the assessment of hydrological risks, the environmental protection, the projects' financial and economic analysis including affordability and alternative analysis, consultations with affected people on resettlement and compensation, and cultural and spiritual issues. On the basis of a preliminary review, the director of CRMU found that the request fulfilled the requirements, and subsequently CRMU registered it on 4 June 2007. After receipt of the Management's response on 6 July 2007, and visiting the project site during 16-19 July, 2007 the director of CRMU assessed the eligibility of the request. Upon finding a *prima facie* evidence of harm and other instances that can raise potential harm, the director made a recommendation to the Boards of Directors to authorize the compliance review of the Bujagali projects. The Boards of Directors authorized the compliance review on 7 September 2007, together with the formation of the Review Panel.

Since a similar request for investigation of the Bujagali Hydropower Project had already been submitted to the World Bank's Inspection Panel (IPN), CRMU and IPN agreed to collaborate on the Bujagali review. The IPN and IRM Bujagali Review Panels, accompanied by specialists in key issues raised in the request, undertook an in-depth fact-finding mission in Uganda during 26 November – 8 December, 2007. In addition, the IRM Bujagali Review Panel undertook



School children at Naminja village

document research and interviews with the Bank's staff in charge of the projects at the Temporary Relocation Agency in Tunis.

The Panel made findings related to the economic, social, cultural, environmental, and hydrological aspects, and found instances of both compliance and non-compliance with the Bank policies and procedures. For some aspects the Panel was concerned about the way

in which the Bank Management and staff had handled certain issues but, because of gaps or lack of clarity in the Bank's polices and procedures, it was unable to make clear findings of either compliance or non-compliance. The full report is available on the Bank's website (www.afdb.org/irm) under the Register of Requests.

The Review Panel's Report on the Bujagali projects, along with the Management's comments to the report's recommendations on policy and procedural issues, were submitted to the Boards of Directors, the President of the Bank Group and the Requestors on 19 June 2008. The report was presented and discussed at the Boards of Directors' meeting on 9 July 2008. The Boards accepted and endorsed the report and its recommendations, and requested the Bank's Management to prepare an Action plan on how to implement the project specific findings and the recommendations of the Panel on policy and procedural issues. The Management's Action Plan is expected to be available for discussion and approval by the Boards of Directors in the first quarter of 2009.

Lessons learned

According to the IRM Operating Rules and Procedures, the IRM Annual Report shall discuss identifiable trends relating to the activities of the Bank Group that have emerged from CRMU's problem-solving exercises and compliance reviews, and the lessons that CRMU has learnt about the impacts and challenges for the Bank in implementing its operating policies and procedures.

Based on the limited experience of the IRM at this point of time of its functioning in general and with compliance review in particular, it may be too early for CRMU to come up with any conclusive trends or lessons. Nevertheless, as learning is a major feature of the complaint handling mechanism, the director of CRMU in consultations with the Experts on the IRM Roster, would like to reiterate the main recommendations of the Bujagali compliance review report with regard to the implementation of the Bank Group's operational policies and procedures:

- The Bank Group's operational policies and procedures should be reviewed to evaluate the comprehensiveness of their coverage, streamlined to avoid unnecessary overlap and systematized so that it becomes easier for the Bank staff and other stakeholders to understand how the different policies, guidelines and manuals relate to each other, and how they should be applied in the Bank's operations.
- The Bank Group should also ensure that its policies and procedures become easily available to all interested parties in the Bank's operations, including borrowers, officials of executing agencies, civil society groups, affected people and the public at large. Facilitating access to the Bank's policies and procedures is consistent with the Bank's Policy on Information Disclosure, and would effectively contribute to enhance awareness and understanding of the Bank's operations among all stakeholders, including affected people living in the areas where projects are being planned and implemented.
- The Bank Group should furthermore evaluate its human resource needs, paying particular attention to the expertise needed to effectively manage the main and cross-cutting issues involved in complex operations. Moreover, to facilitate the work of its staff, the Bank Group should assess its information and document storage system with the purpose of maintaining the Bank Group's institutional memory and enhancing the efficiency in project supervision and monitoring.

The Outreach

Introduction

The primary aim of CRMU's outreach activities is to raise awareness among people and local communities of the existence of the IRM and to empower people to access and make use of the mechanism when they are in need of it. For this purpose, CRMU has developed an outreach strategy on how to inform local communities living in areas where the Bank Group is financing projects. A public information sheet of the outreach strategy is included in annex 2 of this report. The strategy makes use of different instrument, and multifaceted activities jointly undertaken with the Bank's field offices and civil society organizations in regional member countries as well as other departments of the Bank, and occasionally in collaboration with other IAMs of co-financing institutions.

With regard to extending outreach activities through collaboration with civil society organizations, CRMU has developed an NGO database/ network – which by the end of 2008 contains 227 organizations from twenty five member countries of the Bank Group. CRMU communicates with these NGOs through a quarterly electronic newsletter to update them on the IRM activities, and incorporates their views on accountability and independent compliance review issues. Some of these NGOs play an important role in assisting CRMU in convening workshops and seminars, and in distributing IRM information materials to local communities in regional member countries.

Compared to last year, CRMU has doubled the number of its information sharing workshops and seminars, and achieved the outreach goals it had set for itself in 2008. The IRM has been presented to more than 380 representatives of civil society organizations from eighteen African countries.

External Outreach

Tunis: Civil Society Forum

As a side event to the 5th Annual Meeting of the Principals of the IAMs of international financing institution, hosted by CRMU in Tunis on 24-27 June 2008, the Unit organized a seminar for civil society organizations on the accessibility to the IAMs. The seminar aimed at learning from the experiences and views of the participant NGOs with regard to the IAM's handling of complaints submitted by civil society organizations, either on their own right or on behalf of people adversely affected by development projects. The seminar was attended by twenty representatives of international and national civil society organizations from 11 African countries including: the Democratic Republic of Congo, Egypt, Ghana, Kenya, Morocco, Mozambique, Senegal, Tanzania, Uganda, and Zambia. The presentations made by the director of CRMU, the IRM Experts, and principals of the other participant IAMs, and the Principal Population/ Civil Society Officer of the African Development Bank covered respectively: the functions of the different IAMs, the challenges of their accessibility, as well as the processes under the African Development Bank's policy on civil society consultation. Participants reflected on ways to enhance the effectiveness, transparency and accessibility of the IAMs.



Morocco: National Workshop on the Role of NGOs in Dissemination of Information about International Accountability and Independent Review Mechanism Taking the Example of the African Development Bank

In collaboration with the Center for Development of Tensift Region (CDRT), a community based



NGO, CRMU organized this national workshop on April 26, 2008 in Marrakech. The event was attended by 25 participants affiliated to environment, human rights, gender, and advocacy groups. It was opened by Mr. Matondo-Fundani, the resident representative of the Bank Group in Morocco, who also presented the Bank's projects in the country. Mr. Per Eldar Sovik, the director of CRMU, presented the IRM and responded to the participants' questions about the requests and the ways of ensuring the credibility of the mechanism. The workshop was an opportunity to exchange views on the role that the civil society can play in educating people about their rights to use the IRM in case they are likely to be adversely affected by any of the Bank's financed project in their country. The presentations of experiences of NGOs helped in understanding the general expectations of the IRM as a community targeted instrument.

Mozambique: Regional Workshop on IRM and Improved Access to Independent Accountability Mechanisms for Communities and Civil Society



CRMU, "Movimento de Educação para Todos" (Movement Education for All) and the Bank's field office in Mozambique co-organized the seminar on May 19, 2008 in Maputo. The event was attended by 40 participants from Mozambique, Ghana, Zambia and Malawi; in addition to the representatives of the World Bank's Inspection Panel, IFC's Compliance Adviser/Ombudsman (CAO) and the Office of Accountability of the US Overseas Private Investment Corporation (OPIC) who also made presentations on their functions. The workshop discussed how to increase awareness of the existence of the IAMs, and how civil society can disseminate information about these mechanisms.

Zambia: Compliance Adviser/ Ombudsman (CAO) of IFC Workshop for Communities and Civil Society Organizations

CRMU presented IRM in a national workshop co-organized by CAO and Citizens for Better Life, an NGO based in Zambia. The event was held on 23 May 2008 in Lusaka and brought together 82 participants from government institutions, mining industry, NGOs, community members and representatives of other IAMs. It was a unique opportunity for different project stakeholders to discuss their perceptions of information sharing among themselves, and access to IAMs in case the financed development projects inflict harm on people. In a separate seminar, CRMU presented the IRM to the project coordinators of the Bank-financed project and the staff of the Zambia country office.

Madagascar: National Seminars on the African Development Bank Accountability Mechanisms

CRMU co-organized, in collaboration with the Bank's Integrity and Anti-Corruption Division (IACD) and the field office in Madagascar (MGFO), a series of seminars for government officials, civil society and the Bank's staff in Madagascar. The events were organized during November 3-7, 2008 in Antananarivo. They were opened by Mr. Haja Nirina Razafinjatovo, the Minister of Finance and Budget, who praised the Bank for

establishing the IRM and IACD to harness the accountability of its operations thereby benefiting its member countries. The seminars were addressed by Ms. Sylvie Conde, the resident representative of the Bank; Mr. Bruno Boedts, the country operations officer; Mr. Per Eldar Sovik, director of CRMU; Mr. Wilfred Frimpong, chief investigator IACD; Amy Yong Esq., advisor IACD. Their presentations in the government and Bank staff seminars focused respectively on: the Bank's projects, the IRM mandate and functions, anti-corruption and fraud investigations, whistleblowing and ethics in conducting operations. The government seminar was attended by 75 officials and heads of projects implementation units and representatives of national independent accountability agencies.



The civil society seminar was co-organized by CRMU, IACD, MGFO and PACT's off-spring in Madagascar. It brought together 40 civil society organizations from 19 regions of the country. It focused on the collaboration of civil society with the Bank's accountability mechanisms.

Tanzania: National Workshop for Civil Society and Communities on Information and Access to the Independent Review Mechanism

CRMU, in collaboration with the Bank's country office in Tanzania (TZFO) and Lawyers' Environmental Action Team (LEAT), a national NGO, organized a seminar on 11th -12th November, 2008 in Dar Es Salaam. The event was attended by 40 NGOs, the media, and local communities from nine different regions of the country. It was opened by Mr. Per Eldar Sovik, the director of CRMU. Mr. Evans Ntagwabira, infrastructure specialist of TZFO, presented the Bank's operations in the country. Mr. Sovik also presented the



IRM, its relevance to the Bank's safeguard policies, and the CRMU's outreach strategy to raise the awareness of the mechanism among communities. Mrs. Adila Abusharaf, CRMU principal compliance officer, presented the Unit's recently developed Community Information Kit which ultimate goal is to deepen the knowledge of IRM at the local level. Mr. Elias Mwashiuya, the acting Director of LEAT, covered the challenges facing both NGOs and communities in accessing information and getting their demands addressed by independent review mechanisms. The participants acknowledged the establishment of the IRM as a step towards giving a voice to the people and civil society.

Egypt: Government and Civil Society Seminar on IRM

CRMU organized these two seminars for government officials and the Bank's country office operational staff and civil society organizations respectively on December 17-18, 2008, in Cairo. The first seminar was co-organized with the Bank's field office (EGFO). It was attended by the staff, officials from the Ministry of International Cooperation, and managers of projects' implementation units. Mr. Khushhal Chand Khushiram, the Bank's resident representative in Egypt, opened the seminar and briefed the participants on the distinguished cooperation between the Bank and Egyptian government. Mr. Per Eldar



Sovik, CRMU Director, presented the IRM, and called upon the participants to disseminate IRM information among stakeholders to enhance projects' transparency.

The civil society seminar was co-organized with Better Life Association for Comprehensive Development (BLACD), a local organization a local organization. Mr. Khushiram informed the participants of the essential role that the Bank accords to civil society in its projects and policies. Mrs. Almaz Amine, the country operations expert, presented the Bank's projects in Egypt. Mr. Sovik presented the IRM and responded to the participants' questions about the mechanism's independence and adequate information sharing. Mr. Maher Bushra, the Director of BLACD, presented the association's experience in empowering small fishermen/women to improve their income. Mrs. Abusharaf presented CRMU's outreach strategy and the community information kit. The 30 participants from eight provinces of Egypt praised the IRM as a tool that can motivate civil society to monitor the impact of projects on the environment and the communities' livelihoods.

Internal Outreach

CRMU presented the IRM and its outreach strategy in a series of internal meetings and orientation programs organized by the Bank



for its staff, including the newly recruited young professionals. These presentations are important to engage the Bank's operational staff in disseminating information about the IRM and distribution of IRM brochures to project officials when they are on project missions. They also bear value for involving the staff in raising awareness of the IRM when consulting with civil society and potential beneficiaries, namely the people who might be adversely affected by ADB financed projects. They also help the staff to lend credence to issues of due diligence and adherence, and effective implementation of the Bank's policies and procedures. They also provide information which could be useful when the staff is involved in a project undergoing an IRM led problem-solving exercise or compliance review.

New Outreach Tools



IRM Brochure in Kiswahili

CRMU produced in 2008 an IRM brochure in Kiswahili; worth noting that the brochure is also available in English, French, Arabic and Portuguese. It is being considered to translate the brochure into local African languages.

IRM e-Newsletter

The three issues of the Newsletter in 2008 covered articles about the Bujagali compliance review, CRMU outreach events and the views of NGOs on accountability.

IRM Community Information Kit

CRMU finalized the draft of IRM Information Kit which is designed to enhance capacity of NGOs and local communities to understand the applications of IRM rules and procedures.

CRMU NGOs Database

CRMU created a database of NGOs to facilitate access to organizations working in fields relating to the IRM mandate. At present the database includes 227 entries of NGOs based in twenty five member countries of the Bank.

Outreach Targeted Goals in 2009

- Organize community and NGOs sessions in which IRM Information Kit will be utilized. The sessions will be held in countries where national NGO workshops have been conducted by CRMU in the past two years.
- Convene national workshops in member countries, including in Ghana, Nigeria, Malawi, and a regional seminar in Senegal, during which NGOs from six members countries will be participating (Cape Verde, Mauritania, Gambia, Guinea Bissau, Mali and Senegal).
- Produce Bank's staff IRM brochure.
- Assess outreach strategy as part of the IRM Review to be held in mid 2009.
- Organize a series of internal meetings with the Bank's management and to explore the possibility of including IRM information in the Bank's project documents such as the environmental impact assessments and loan agreements.

CRMU Staff

Mr. Per Eldar Sovik, Director



Mr. Sovik was appointed as the first Director of the Compliance Review and Mediation Unit (CRMU) in 2006. He is in charge of the management of the IRM, including: the assessment of eligibility of requests, the problem-solving (mediation) process, outreach activities and monitoring. He is also a permanent member of Compliance Review Panels. He directly reports to the President and the Bank's Group Boards of Directors. He held management positions for over 33 years in private and public sectors in different organizations in Norway, Finland and different African countries including: Ethiopia, Ghana, Kenya and Sudan, Zambia. Before joining the Bank, Mr. Sovik worked for almost 10 years with the Nordic Development Fund and as a Vice President for six years (2000- 2006). He has extensive experience in project management, economics and financial analysis and project and institutional evaluations. Besides the university degrees in economics, finance, and management from Norway, he has obtained a Master Degree in development economics from the University of Manchester, in England.

Mrs. Adila Abusharaf, Principal Compliance Officer



Mrs. Abusharaf joined the Bank in 2007. She gives support to the director in coordination of the outreach activities, the assessment of requests, preparation of CRMU annual strategic and financial documents; the preparation of compliance review and mediation. Her over fifteen years of experience with international development obtained from the positions she held, with the International Development Research Center (IDRC), University of Toronto, and York University. As well as, when she was a regional program officer with the Center of Arab Women for Training and Research based in Tunisia and and as a lawyer in Sudan. Her work and publications focus on: foreign direct oil investment, compensation, local governance, conflict-resolution, and gender-equity and cover: Algeria, Cameroon, Egypt, Mauritania, Morocco, Nigeria, Tunisia, and Sudan. She obtained her Doctorate on Juridical Studies from the University of Toronto in 2000 on private international law of transnational litigation of oil pollution claims.

Miss. Amira Dhaouadi, Team Assistant



Miss Dhaouadi joined CRMU in 2007. She is responsible for technical management of IRM communication systems and materials (the website, brochures and newsletter). She is also responsible for: procurement, logistical support of workshops and budget coordination. She gives support to the director of CRMU in the administration of the IRM Roster of Experts and consultants. She is enrolled in the Masters Program, at Higher School of Electronic Commerce of Manouba, Tunisia. Her thesis is on international e- procurement. Before CRMU, she worked for international companies in Tunis.

Miss Mouna Beji, Secretary (short-term staff)



Miss Beji is CRMU's secretary and joined CRMU in June 2008. She also worked with the Bank's Financial Management Department and international companies in Tunis. She holds a High Diploma in English and International Relations from the High Institute of Human sciences in Tunis.

IRM Roster of Experts

Dr. Madiodio Niasse, Chairperson



Dr. Niasse, is (since November 2008), the Director of the International Land Coalition (ILC), an independent organization hosted by IFAD in Rome, Italy. Before this position, he was serving as Research Director with Institut de Recherche pour le Développement (IRD), Montpellier, France. Dr. Niasse holds a Doctorate in Environmental Sciences and a Master's degree in Geography, both from the University of Dakar, Senegal. His post-doctoral work experience includes: (a) four years (1988-1992) of research activity on the impacts of dams in the Senegal River Basin; (b) seven years (1992-1998) with USAID in Dakar (Senegal) and in Abidjan (Cote d'Ivoire) as Social Sciences Advisor; (c) two years (1998-2000) as Senior Advisor with the World Commission on Dams (Cape Town, South Africa); (d) four years (2001-2005) as Regional Coordinator of Wetlands and Water Resources Programmes with IUCN-West Africa Office based in Ouagadougou, Burkina Faso. From April 2005 to January 2009, Dr. Niasse was the chairman of GWP/West Africa Global Water Partnership (GWP/WAWP). He has a direct short- and long-term work experience in more than 10 African countries, including Benin, Burkina, Guinea, Ghana, Mali, Mauritania, Niger, Nigeria, Senegal, South Africa, Zambia, and Zimbabwe. He has published extensively on various subjects related to the environmental, socio-economic and institutional aspects, with special emphasis on issues such as wetlands and river basin/water resources management; climate change; land tenure; farming systems; and conflict management.

Dr. Maartje van Putten, Member



Dr. van Putten is the vice-chair of the European Center for Development Policy Management (ECDPM), a member of the supervisory board of the Royal Tropical Institute in the Netherlands and an advisor on Accountability Mechanisms for private financial institutions. She was a member of the World Bank Inspection Panel (1999-2004), and the European Parliament (1989-1999). She is trained as a journalist, and holds a master degree on management in the field of community work from the Social Academy in Amsterdam. She obtained in 2006 her Doctorate degree from Tilburg University Netherlands in cooperation with McGill University in Montreal, Canada. Her PhD thesis is entitled 'Policing the World: Accountability Mechanisms for Multilateral Financial Institutions and Private Financial Institutions', which has been published in a book in 2008. Dr. van Putten has also published several articles and a book on the phenomena Globalization. Her experience with the media includes producing radio programs on poverty, feminization of poverty, North-South relations, the informal sector, child labor, grass-roots organizations, and globalization of the labor market and directing a TV documentary on globalization. She is the founder of a Dutch NGO focusing on the living conditions of children, and has been a staff member of the Evert Vermeer Foundation working on international solidarity. As a member of the European Parliament she reported on: the effects of the General Agreement on Tariffs and Trade on developing countries, legal basis for the EU budget lines for development aid to Asia and Latin America, the Tropical Forest budget line, the EU policy on the rights of Indigenous Peoples, the EU chocolate directive ("position cocoa farmers") or the budget line for integration of environment into development.

Prof. Daniel D. Bradlow, Member



Prof. Bradlow is the SARCHI Professor of International Development Law and African Economic Relations at the University of Pretoria, South Africa

and a Professor of Law and Director of the International Legal Studies Program at American University Washington College of Law in Washington, D.C. He is a member of the Board of Directors of ILEAP (International Lawyers and Economists Against Poverty) and of the Governing Board of the African Law Institute.

His current scholarship focuses on the international financial institutions, creative financing for development, international legal aspects of sustainable and equitable development, and the legal aspects of debt and financial management. He has worked as a Senior Special Fellow in the Legal Aspects of Debt and Financial Management Programme of the United National Institute on Training and Research (UNITAR), a Consultant to the World Dams Commission, MEFMI (The Macroeconomic and Financial Management Institute for Eastern and Southern Africa), PoleDette, the World Bank, the African Development Bank, UNESCO, the United Kingdom's Department for International Development and the MacArthur Foundation. He served as a member of the International Law Association's Committee on Accountability of International Organizations and is currently the Co-Rapporteur of the International Law Association study group on the same topic. In 1996 he was a Visiting Professor at the Community Law Centre at the University of the Western Cape, South Africa. He has lectured in the United States and many countries in Africa, Asia and Latin America on both the public and private aspects of international economic and financial law and on the negotiating and structuring of international economic transactions.

Prior to joining WCL, Professor Bradlow was a Research Associate at the International Law Institute and a consultant to the United Nations Centre on Transnational Corporations, as well as an attorney in private practice.

His publications include books and articles on international financial law, the international financial institutions, foreign investment, inspection mechanisms in international financial institutions, regulatory frameworks for water, dams and dam safety, globalization and its implications for global economic governance and the changing responsibilities of the World Bank and the IMF in the management of the global economy. Professor Bradlow holds degrees from the University of Witwatersrand in South Africa, and Northeastern University and Georgetown University in the USA and is a member of the New York and District of Columbia Bars.

Fincancial Matters

2008 Budget and Costs in Unit of Accounts (UA)

Budget item	Budget	Actual & Committed Costs
Salaries CRMU staff	217 089	212 715
Missions	68 741	34 199
Public Relations, Meetings, etc.	73 000	74 582
Experts and Review Missions	405 000	88 419
Consultants *	100 355	52 280
Total	864 185	462 195

ANNEX 1

IRM Operating Rules and Procedures

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I. Introduction

The Compliance Review and Mediation Unit ('CRMU') is the focal unit of an independent review mechanism established by the Boards of Directors of the African Development Bank (the 'Bank') and the African Development Fund (the 'Fund') pursuant to Resolutions B/BD/2004/9 – F/BD/2004/7 and B/BD/2004/10 adopted by the Boards of Directors on 30th June 2004 (collectively the 'Enabling Resolution').

The Enabling Resolution establishes the CRMU's authority and these Operating Rules and Procedures ('Rules') are adopted within the framework of the Enabling Resolution to provide detail to the operational provisions. The text is based on the Enabling Resolution.

a. Purpose

The CRMU has been established for the purpose of providing people adversely affected by a project financed by the Bank, the Fund, the Nigeria Trust Fund and other Special Funds administered by the Bank (collectively the 'Bank Group') with an independent mechanism through which they can request the Bank Group to comply with all its own policies and procedures. The mechanism is, therefore, available when two or more affected persons believe that the Bank Group has failed to comply with any of its policies and procedures; that this failure has, or threatens, to adversely affect them and that efforts have been made to ask the Bank Group's Management (the 'Management') itself to remedy the problem.

b. Functions

The role of the CRMU is to perform both compliance review and problem-solving functions. Through its compliance review function, the CRMU will, in the case of Bank Group-financed sovereign guaranteed projects, focus on issues of non-compliance by an institution within the Bank Group with any of its operational policies and procedures in respect of the design, implementation or supervision of such project, and, in the case of private sector and/or non-sovereign guaranteed Bank Group-financed projects, on social and environmental compliance. The problem-solving function will be used where complaints or grievances can also, or alternatively, benefit from problem-solving techniques to assist in trying to resolve the underlying issues. These techniques will include independent fact-finding, mediation, conciliation, dialogue facilitation and reporting.

The compliance review function will be triggered when the CRMU receives a request for review based on an eligible complaint. It will make a preliminary review of the complaint and determine whether the case is more appropriate for problem-solving or compliance review. The CRMU will oversee the problem-solving exercise. The CRMU will conduct the compliance review function with the assistance of external experts.

The CRMU will make recommendations to the Boards of Directors of the Bank and Fund (collectively the 'Boards') or the President of the Bank Group (the 'President'), as the case may be, on remedial action that may be taken following a problem-solving exercise and/or on the initiation of a compliance review exercise with respect to any particular complaint.

The CRMU may monitor the implementation of recommendations that it makes and that are approved by either the Boards or the President, as the case may be, following completion of a problem-solving or compliance review exercise.

c. Composition

A director (the 'Director') assisted by a compliance officer and secretarial support staff heads the CRMU. The CRMU will maintain a roster of three (3) experts ('Roster') appointed by the Boards on fixed, non-renewable terms. The CRMU shall provide administrative support to compliance review panels, comprising the Director and two experts from the Roster ('Expert(s)'), which undertake compliance review exercises.

d. Participants

During the preliminary review period – from the receipt of a complaint and request for review up to the time a decision is made on whether to register the request – the CRMU will accept statements or evidence from (i) the Requestors or their representative; (ii) Management; and (iii) any

other individual or group of individuals invited by the Director to present evidence or comments.

During a problem-solving exercise or substantive compliance review, the following shall be entitled to submit information or evidence relevant to the complaint: (i) any person who is either a party to the problem-solving exercise or review; and (ii) the authorized representative of a party or parties that satisfies the Director or a compliance review panel ('Panel'), as the case may be, that he has or they have a direct interest in the subject matter of the complaint, apart from the general public interest (collectively 'interested person(s)').

II. Subject Matter of Requests

a. Scope

1. The CRMU is authorized to accept requests for review ('Request(s)') from two or more persons with a common interest ('Requestors') who allege that an actual or threatened material adverse effect on the affected persons' rights or interests arises directly from an act or omission of a member institution of the Bank Group as a result of the failure by the said institution to follow any of its own operational policies and procedures during the design, appraisal and/or implementation of a Bank Group-financed project. Requestors will be encouraged and required, prior to submitting a Request, to make good faith efforts to resolve their complaints with Management.

b. Limitations

2. CRMU is not authorized to receive Requests relating to:

(i) procurement by the Bank Group or its borrowers from suppliers of goods and services financed by or expected to be financed by the Bank Group under a loan or grant agreement, or from losing tenders for the supply of such goods and services which shall continue to be addressed under other existing procedures;

(ii) fraud or corruption;

(iii) matters before the Administrative Tribunal of the Bank;

(iv) matters before other judicial review or similar bodies;

(v) frivolous or malicious complaints;

(vi) complaints motivated by an intention to gain competitive advantage;

(vii) matters over which the CRMU, a Panel, the President or the Boards has/have already made a recommendation or reached a decision after having received and reviewed a Request, unless justified by clear and compelling new evidence or circumstances not known at the time of the prior request;

(viii) complaints filed more than 12 months after the physical completion of the project concerned or more than 12 months after the final disbursement under the loan or grant agreement or the date of cancellation of the undisbursed amount;

(ix) actions that are the responsibility of other parties, including the borrower or potential borrower, and which do not involve any action or omission on the part of the Bank Group;

(x) the adequacy or unsuitability of Bank Group policies or procedures; and

(xi) private sector or other non-sovereign guaranteed projects except in instances of an alleged breach of the Bank-Group's agricultural, education, health, gender, good governance or environmental policies.

III. Preparation of a Request

3. The CRMU's operational proceedings begin when a Request is received. This section of the Rules is primarily designed to give further guidance to potential Requestors on what facts and explanations they should provide.

a. Who can file a Request?

4. The CRMU has authority to receive Requests that complain of a violation of the Bank Group's policies and procedures from the following people or entities:

(a) any group of two or more people in the

country or countries where the Bank Group-financed project is located who believe that as a result of the Bank Group's violation, their rights or interests have been, or are likely to be, adversely affected in a direct and material way. They may be an organization, association, society or other grouping of individuals; or

(b) a duly appointed local representative acting on explicit instructions as the agent of adversely affected people; or

(c) in exceptional cases, referred to in paragraph 13 below, a foreign representative acting as agent of adversely affected people.

b. Contents of a Request

5. In accordance with the Enabling Resolution, Requests should contain the following information:

(a) a description of the project, stating all the relevant facts including the harm suffered by or threatened to the affected parties;

(b) where possible, an explanation of how Bank Group policies, procedures or contractual documents were seriously violated;

(c) where possible, a description of how the act or omission on the part of the Bank Group has led or may lead to a violation of the specific provision;

(d) a description of how the parties are or are likely to be materially and adversely affected by the Bank Group's act or omission and what rights or interests of the parties were directly affected;

(e) a description of the steps taken by the affected parties to resolve the violations with Bank Group staff, and explanation of how the Bank Group's response was inadequate;

(f) in Requests relating to matters previously submitted to the CRMU, a statement specifying what new evidence or changed circumstances justify revisiting the issue; and

(g) if some of the information cannot be provided, an explanation should be included.

c. Form of Request

Written

6. All Requests must be submitted in writing, dated and signed by the Requestors and contain their names, contact addresses and an address to which correspondence shall be sent (if different from the Requestors' address(es)). The Requestors and any other interested persons may, however, request that their identities be kept confidential, and if so, the reasons for such confidentiality.

Confidentiality

7. If the Request contains a confidentiality request under paragraph 6 above, the Director shall determine whether such confidentiality is warranted. All reasonable efforts shall be used to keep confidential the identities of the Requestors and other interested persons. If in the reasonable opinion of the Director, the review process cannot proceed with the requested confidentiality being maintained, the Requestors and other interested persons shall be notified accordingly. The Director shall then agree the terms of proceeding with the Requestors and other interested persons or terminate the process if it is not possible to agree upon such terms.

Format

8. No specific form is necessary: a letter will suffice.

Language

9. The working languages of the CRMU shall be the official languages of the Bank (i.e. English and French). Requests may be submitted directly by affected people themselves in their local language if they are unable to obtain a translation. Where Requests are not in either English or French, the time needed to translate and ensure an accurate and agreed translation may delay acceptance and consideration of the Request.

10. The CRMU will try and respond to Requests in the language of submission, where practicable, but will in any event respond in either of the official languages of the Bank Group with which the Requestors are most comfortable.

Representatives

11. Where the Requestors are affected persons, or entities, representing affected people, the Requestors or their representative shall attach to the Request written signed proof that they have authority to act on behalf of the affected people.

12. If a non-affected representative submits the Request, he or she must provide evidence of representational authority and the names and contact address of the affected parties must be provided. Proof of representational authority, which shall consist of the original signed copy of the affected parties explicit instructions and authorization, must be attached.

13. In addition, in cases of non-local representation, the CRMU will require clear evidence that there is no adequate or appropriate representation in the country or countries where the project is located.

Documents

14. The following documents should be attached:

(a) all correspondence with Bank Group staff;

(b) notes of meetings with Bank Group staff;

(c) a map or diagram, if relevant, showing the location of the affected parties or area affected by the project; and

(d) any other evidence supporting the Request.

15. If all the information listed cannot be provided an explanation should be included with the Request.

d. Delivery of Request

16. Requests must be sent by registered or certified mail or delivered by hand in a sealed envelope against receipt to the CRMU at the Bank Group's [principal office or Temporary Relocation Agency ('TRA')] or to the Bank Group's resident representative in the country or countries where the project is located. In the latter case, the resident representative shall, after issuing a receipt to the Requestors, promptly forward the request to the CRMU through the next pouch.

e. Advise on Preparation

17. People or entities seeking advice on how to prepare and submit a Request may contact the CRMU, which will provide information or may meet and discuss the requirements with potential Requestors.

f. Effect of Filing a Request

18. Notwithstanding any other provision in these Rules, the filing, assessment, registration or processing of a Request or the carrying out of a compliance review or problem-solving exercise shall not have the effect of suspending processing of, or disbursements in respect of, the relevant Bank Group-financed project. If at any time during the processing of a Request, the Director is of the opinion that serious, irreparable harm shall be caused by the continued processing or implementation of the Bank Group-financed project, the Director may make an interim recommendation to suspend further work or disbursement. Such recommendation shall be considered in light of any contractual obligation or other relevant policies of the Bank Group and the decision concerning such recommendation shall be made:

(a) by the relevant Bank Group officer or body vested with the power to make such a decision; and

(b) only if the Bank Group has the right to suspend or cancel in accordance with the terms of any applicable loan and/or investment and/or other agreement.

IV. Procedures on Receipt of a Request

19. When the CRMU receives a Request, the Director, on the basis of the information contained in the Request, shall, within fourteen (14) days of receipt of the Request, conduct a preliminary review to determine if the Request contains a bona fide allegation of harm arising from a Bank Group-financed operation and thereafter either register

the Request, or ask for additional information or find the Request outside the CRMU's mandate.

a. Register

20. If a Request contains a bona fide allegation of harm arising from a Bank Group-financed operation, and it appears to contain sufficient required information, the Director shall make a determination on whether the Request should be: (i) registered for a problem-solving exercise; and/or (ii) considered further for recommendation for a compliance review. Once this determination is made, the Director shall register the Request in the register of Requests (the 'Register'); promptly notify the Requestors, the Boards and the President of the registration, the proposed remedial course of action and the reasons therefore and transmit to the Boards and/or the President as the case may be a copy of the Request with the accompanying documentation, if any.

Contents of Notice

21. The notice of registration shall:

(a) record that the Request is registered and indicate the date of the registration and dispatch of that notice;

(b) the notice will include the name of the project, the country or countries where the project is located, the names of the Requestors unless anonymity is requested, and a brief description of the Request;

(c) notify the Requestors that all communications in connection with the Request will be sent to the address stated in the Request, until another address is indicated to the CRMU; and

(d) request Management to provide the CRMU, within twenty-one (21) days after receipt of the notice and Request, with written evidence that it has complied, or intends to comply with the Bank Group's relevant polices and procedures. The notice shall specify the due date of the response.

b. Request Additional Information

22. If the Director finds the contents of the Request or documentation on representation insufficient, he or she may ask the Requestors to supply further information.

23. Upon receipt of a Request, the Director shall send a written acknowledgment to the Requestors, and will specify what additional information is required.

24. The Director may decline to register a Request until all necessary information and documentation is filed.

c. Outside Scope

25. If the Director finds that the matter is without doubt manifestly outside the CRMU's mandate, he or she shall notify the Requestors of his or her refusal to register the Request and of the reasons therefore. This will include, without limitation, Requests that:

(a) are clearly outside the CRMU's mandate including those listed in paragraph 2 above;

(b) do not show the steps taken or effort made to resolve the matter with Management;

(c) are from a single individual or from a non-authorized representative of affected parties;

(d) are correspondence, including but not limited to letters, memoranda, opinions, submissions or requests on any matter within the CRMU's mandate which are not requests for a review; and

(e) are manifestly frivolous, absurd or anonymous.

Records

26. The number of such Requests and communications received shall be noted in the Register on a quarterly basis and the yearly total included in an annual report prepared by the CRMU (the 'Annual Report').

d. Need for Review

27. In cases where additional information is required, or where it is not clear whether a Request is manifestly outside the CRMU's mandate, the

Director shall designate an Expert to review the Request and advise on whether it is eligible.

e. Revised Request

28. If the Requestors receive significant new evidence or information at any time after the initial Request was submitted, they may consider whether or not it is serious enough to justify the submission of a revised Request.

29. If a revised Request is submitted the time period for Management's response and the CRMU or the Panel's recommendation, as the case may be, will begin again from the time such revised Request is registered.

f. Extension of Time Periods

30. Any time period referred to in these Rules may be extended by the Director for as long as is strictly necessary to ensure full and proper investigation, assessment, review and initiative. Any such extension shall be promptly notified to the Requestors and all interested persons. In considering whether any extension is required, the Director shall take into account, inter alia, the location of the Bank Group-financed project, the need for Bank staff to participate in the process, any time-sensitive issues relating to the Bank Group-financed project, the availability of Experts and the need for translation of communications.

V. Management's Response

31. Within twenty-one (21) days after being notified of a Request, Management shall provide the CRMU with evidence that it has, or intends to comply with the Bank Group's relevant policies and procedures. After the CRMU receives Management's response, it shall promptly enter the date of receipt in the Register.

32. If there is no response from Management within twenty-one (21) days, the CRMU shall notify the Boards and the President accordingly and send a copy to the Requestors.

Clarification

33. In order to undertake a problem-solving exercise and/or make an informed recommendation, the CRMU or the Panel, as the case may be, may request clarification from Management; in the light of Management's response, request more information from the Requestors; and provide relevant portions of Management's response for comment. A time limit for receipt of the information requested shall be specified; and

(a) whether or not such clarification or information is received within the time limit, undertake and conclude the problem-solving exercise and/or make its recommendation to the Boards or the President as hereinafter provided or otherwise terminate the process within twenty-one (21) days of receipt, or at the expiry of the time limit for the receipt, of Management's clarification; or

(b) in the event it is not possible for the Requestors to provide the information quickly, the CRMU, or the Panel, as appropriate may advise the Requestors to submit an amended Request; the Boards and Management will be notified that the process will recommence when the amended Request is received.

VI. Problem-Solving

a. Problem-Solving Exercise

34. In considering whether a problem-solving exercise should be undertaken, the Director shall take into consideration:

(a) whether the problem-solving exercise is appropriate and may assist in addressing undue, incidental effects resulting from Bank Group-financed project conditionalities agreed in the context of the project concerned;

(b) whether the problem-solving exercise is likely to have a positive result;

(c) whether the Requestors and any interested persons are amenable to such problem-solving exercise;

(d) whether the Bank Group has or continues to have sufficient leverage to influence change;

(e) whether the conduct of a problem-solving exercise may interfere with the conduct of a compliance review, if any;

(f) whether the problem-solving exercise may duplicate, or interfere with, or may be impeded by, any other process pending before a court, arbitration tribunal or review body (such as an equivalent mechanism at another co-financier) in respect of the same matter or a matter closely related to the Request; and

(g) any other relevant matters.

35. If, as provided in paragraph 34 above, the Director determines that a Request may be handled through a problem-solving exercise, he or she shall invite all the relevant parties, namely the Requestors, Management representatives and other interested persons to participate in the exercise.

36. The objective of a problem-solving exercise is to restore an effective dialogue between the Requestors and any interested persons with a view to resolving the issue or issues underlying a Request, without seeking to attribute blame or fault to any such party. A problem-solving exercise may be conducted only if the Request has been declared eligible in accordance with paragraph 20, but irrespective of whether a compliance review is conducted.

37. In undertaking the problem-solving exercise, the Director may use a variety of problem-solving techniques, including independent fact-finding, mediation, conciliation, dialogue facilitation, investigation and reporting.

b. Problem-Solving Report

38. The Director shall prepare a separate problem-solving exercise report ('Problem-Solving Report') within thirty (30) days of the conclusion of the problem-solving exercise and shall include:

(a) the facts underlying the Request;

(b) the considerations on which the conclusions and recommendations, if any, are based; and

(c) any relevant comments from the Requestors and any interested persons.

Successful Problem-solving Exercise

39. If the problem-solving exercise is successful, the Director will include in the Problem-Solving Report the solution agreed upon by the Requestors, Management and any interested person. The Problem-Solving Report shall be provided to all the participants in the problem-solving exercise and to the Boards and the President.

40. The CRMU will monitor the implementation of the solution agreed upon in a problem-solving exercise. Where the project forming the subject matter of the Request has not yet been presented to the Boards for their approval, the Director shall submit the monitoring report to the President and, as and when the project is submitted for Board approval, to the Boards. Any report to the President shall be immediately copied to the Boards.

Unsuccessful Problem-Solving Exercise

41. If the problem-solving efforts are not successful, either within a period of three (3) months from the commencement of the problem-solving exercise or by common consent of the parties, the Director will declare the problem-solving exercise unsuccessful and submit in the Problem-Solving Report a description of the efforts made, the reasons for their failure and make recommendations on steps the Bank Group could take to deal with the unresolved issue. The Problem-Solving Report should be submitted to the participants in the problem-solving exercise, the Boards and the President.

42. The President, in cases where the project that is the subject matter of the Request has not yet been submitted for Board approval, and the Boards, in cases of projects that they have already approved, will decide whether to accept or reject the Director's recommendations for remedial action. If the President or Boards decide to reject the recommendation, they will inform all participants in writing of their reasons for doing so. A summary of the decision and the Problem-Solving Report shall, subject to the Bank Group's Disclosure of Information Policy and any requests for confidentiality, be published on the Bank Group's website.

c. Conversion of a Problem-Solving Exercise to Compliance Review

43. Where at the conclusion of a problem-solving exercise, whether or not successful, the Director determines, as provided in paragraph 44 below, that a compliance review is warranted, the Director may include in the Problem-Solving Report a recommendation that the project undergo a compliance review. Such a recommendation will be submitted to the President or Boards, as the case may be, for ratification in accordance with paragraph 46.

VII. Compliance Review

a. Recommendation for a Compliance Review

44. If, as provided in paragraphs 20, 33 or 43 above, the Director determines that there is prima facie evidence the Requestors have been harmed/threatened with harm by a Bank Group-financed project and that the harm or threat was caused by the failure of the Bank Group's staff and Management to comply with any of the Bank Group's relevant policies and procedures, he or she shall within thirty (30) days of such determination submit a report recommending a compliance review of the project in issue to the (a) President, with a copy to the Boards, if the Request relates to a Bank Group-financed operation that has not been approved by the Boards, or (b) Boards if the Request relates to a Bank Group-financed operation that has been approved by the Boards.

45. The compliance review recommendation shall include draft Terms of Reference which shall set out the scope and time frame for the compliance review and shall provide an estimate of the budget and a description of additional resources required to complete the review and shall identify two Experts from the Roster (one of whom shall chair the Panel) who shall constitute, together with the Director, a Panel to conduct the compliance review.

46. In considering the recommendation for a compliance review, the Boards or the President, as the case may be, may:

(a) approve the recommendation(s) on a 'non-objection' basis; or

(b) remit the Request to the Director or to an Expert to reassess the recommendation regarding the membership and/or chair of the Panel, and the draft Terms of Reference for the compliance review, with a new recommendation, if any, being submitted to the President or the Boards as the case may be.

47. Any decision made by the President pursuant to paragraph 46 in respect of an operation that has not been approved by the Boards shall be immediately copied to the Boards. Subject to the provisions of the Bank Group's Disclosure of Information Policy (in particular those relating to the disclosure of confidential information and/or documents), the recommendation for a compliance review and the decision made by the President or the Boards, as the case may be, pursuant to paragraph 46 shall be promptly communicated to the Requestors and any other interested person, and a summary of the decision and the recommendation for a compliance review shall be published on the Bank Group's website.

b. Denial by Director of a Compliance Review

48. Where, following the receipt and registration of a Request in which the Requestors have sought a compliance review and such Request is not otherwise processed through a problem-solving exercise, the Director determines that the Request is not eligible for a compliance review, the Request shall be referred to the Chairperson of the Roster who shall determine the eligibility or otherwise of the Request for compliance review within twenty-one (21) days of the Director's determination.

49. If the Chairperson of the Roster determines that the Request is not eligible for a compliance review, he or she shall inform the Boards or the President (where the project in issue has not been approved by the Boards) of the ineligibility. If the Chairperson of the Roster determines that the Request is eligible for a compliance review, he or she shall recommend to the Boards or to the President, as the case may be, that a compliance review be authorized. Such compliance review recommendation shall include the details prescribed in paragraph 45 above.

c. Conduct of a Compliance Review

50. The Panel shall conduct the compliance review in accordance with the relevant approved Terms of Reference and within the required time frame. The Panel shall take any appropriate steps required to conduct the compliance review, and in particular may:

(a) solicit additional oral or written information from, or hold meetings with, the Requestors and any interested party;

(b) undertake site visits to the project(s) in issue;

(c) retain additional expertise in accordance with paragraph 74; and

(d) take any other action as may be required to complete the compliance review within the required time frame.

Prior to taking such steps, the Panel shall take into account the budget implications and administrative requirements of such steps.

d. Panel Deliberations

51. The Experts on the Panel shall each have one (1) vote and decisions of the Panel shall be taken by simple majority. The Director shall participate in all aspects of a compliance review undertaken by a Panel but shall have a vote only in the event of a deadlock in a Panel's deliberations.

e. Compliance Review Report

Contents

52. Within thirty (30) days of the completion of its investigations, the Panel shall report its findings and recommendations in a report ('Compliance Review Report'), which shall:

(a) include a summary discussion of the relevant facts, the respective positions of any interested party in relation to the subject matter of the Request and the steps taken to conduct the compliance review;

(b) set out the findings of the Panel which, unless otherwise provided in the Terms of Reference, shall be limited to determining whether or not any action by the Bank Group, or failure to act, in respect of a Bank Group-financed project has involved one or more material violations of policies in accordance with paragraph 1;

(c) if the Panel concludes that any Bank Group action, or failure to act, in respect of a Bank Group-financed project has involved one or more material violations of policies in accordance with paragraph 1, recommend:

i. any remedial changes to systems or procedures within the Bank Group to avoid a recurrence of such or similar violations;

ii. any remedial changes in the scope or implementation of the Bank Group-financed project, subject to consideration of any restrictions or arrangements already committed to by the respective Bank Group institution or any other relevant party in existing project-related agreements; and/or

iii. any steps to be taken to monitor the implementation of the changes referred to in (i) and (ii) above, and the person in charge of such monitoring (who shall be the Director and an Expert so appointed unless the Boards or the President, as the case may be, decide otherwise); and

(d) attach a copy of the original Request, the response of the relevant Bank department(s) and a list of supporting documents relied upon in the compliance review.

If recommendations set out in sub-paragraph (c) above are included in the Compliance Review Report, the Compliance Review Report shall include an assessment from the relevant Bank department setting out whether such recommendations are appropriate and if so, a timetable and an estimate of the human and financial resources required to implement such recommendations, if approved by the Boards or the President, as the case may be.

No Award of Compensation

53. The Compliance Review Report may not recommend the award of compensation or any other benefits to the Requestors or any other person, entity or government beyond that which

may be expressly contemplated in a relevant Bank Group policy.

Impartiality

54. Recommendations and findings of a Compliance Review Report shall be based only on the facts relevant to the Request under consideration and shall be strictly impartial.

Submission

55. The Panel shall submit the Compliance Review Report for consideration and decision to:

(a) the President, with a copy to the Boards for information, if the relevant Bank Group-financed project has not been approved by the Boards at the time the Compliance Review Report is ready for submission, or

(b) the Boards, if the Boards have approved the relevant Bank Group-financed project at the time the Compliance Review Report is ready for submission.

Communication of the Compliance Review Report

56. Subject to the provisions of the Bank Group's Disclosure of Information Policy (in particular those relating to the disclosure of confidential information and/or documents), the Compliance Review Report shall be made available to the Requestors and any other interested persons at the same time as it is submitted for consideration and decision in accordance with paragraph 55.

Contents of Decision

57. The Boards or the President, as the case may be, shall decide whether or not to accept the findings and recommendations in the Compliance Review Report. Any decision made by the President in respect of a Bank Group-financed project that has not been approved by the Boards shall be immediately copied to the Boards.

Publicity of Compliance Review decision

58. Subject to the provisions of the Bank Group's Disclosure of Information Policy (in particular those relating to the disclosure of confidential information and/or documents), the decision made by the Boards or the President, as the case may be, pursuant to paragraph 57 shall be promptly communicated to the Requestors and any interested party. Subject to the same provisions, such decision and the Compliance Review Report shall be published on the Bank Group's website.

Monitoring of changes

59. The persons in charge of monitoring the implementation of the changes referred to in sub-paragraph 52(c), shall report on such implementation to the Boards or the President, as the case may be, as often as required and in any event not less than once a year. Any report to the President shall be immediately copied to the Boards.

VIII. Administration of the CRMU

a. Term of Director

60. The Director shall be appointed by the President, in consultation with the Boards, for a five (5) year term that may be renewed only once for a successive five (5) year period. The Director shall not have worked for the Bank Group in any capacity whatsoever for the period of at least two (2) years prior to his or her appointment and shall not be entitled to work for the Bank Group in any capacity whatsoever following the expiry of his or her appointment.

b. Responsibilities of the Director

61. The Director shall have overall responsibility for the day-to-day operations and external relations of the CRMU, which shall include, but not be limited to:

(a) arranging for the selection of Experts for the Roster as required upon resignation or expiration of an Expert's term of appointment in accordance with the Bank Group's procurement rules applicable to the selection of consultants and preparing the President's recommendation and reports to the Boards concerning the appointment and removal of Experts;

(b) establishing, with the approval of the President, such administrative procedures and guidelines necessary for the proper functioning of the CRMU and the Roster;

(c) overseeing the establishment and maintenance of the Register open to the public on the Bank Group's website, which shall contain significant data concerning the delivery and registration of Requests, as well as the conduct and outcome of problem-solving exercises and compliance reviews;

(d) maintaining a documentary record for each Request, as well as a library of all materials relevant to the functioning of the CRMU;

(e) sending out notices of registered Requests to all interested persons; noting the progress of each Request on the Register and, if required by the circumstances, providing additional updates on such progress to the Requestors and other interested persons; responding to requests for information from Requestors and other interested persons in respect of a particular Request;

(f) dealing with any requests for information about the CRMU; publicizing and being the spokesperson of the CRMU;

(g) insuring that all timeframes are met and approving any extensions in accordance with paragraph 30; liaising with other CRMU officers and the Experts, and ensuring that such CRMU officers and Experts fulfill their responsibilities generally and in accordance with any applicable Terms of Reference;

(h) without prejudice to the powers of the Boards and the President under these Rules, taking any steps required to ensure the integrity of CRMU processes, including the replacement of any Expert whose impartiality or independence in any compliance review is in doubt;

(i) arranging for any translations of Requests, reports or other documents that may be required;

(j) providing administrative and logistical support to other CRMU officers and the Experts, including without limitation, making and supervising arrangements for meetings, site visits and CRMU proceedings in the Bank Group's principal office or elsewhere;

(k) administering the budgetary allocations for the CRMU;

(l) overseeing the establishment and maintenance of one or more databases of consultants, researchers, technical experts, mediators, conciliators, facilitators, translators, interpreters, etc., whose services may be called upon in connection with compliance reviews and problem-solving exercises;

(m) undertaking any other tasks that may be necessary or incidental to the administration of the CRMU and/or the Roster.

c. Delegation by Director

62. In his or her absence, the Director may delegate his or her authority to members of staff in his or her office in accordance with the Bank Group's Delegation of Authority Manual as may be amended from time to time.

d. Appointment of Experts to Roster

Roster

63. The Roster shall comprise three (3) individuals selected in accordance with the Bank's procurement rules applicable to the selection of consultants and appointed by the Boards on the recommendation of the President. The Experts shall be paid a retainer during their service on the Roster. The retainer, other remuneration and terms of appointment of Experts shall be determined by the Boards, upon the recommendation of the President, such terms to include the right of the Boards to remove an Expert for cause without cost or liability to the Bank. The Experts shall be reimbursed their travel and other expenses on the same basis as judges of the Administrative Tribunal of the Bank. The Boards shall appoint a Chairperson of the Roster from amongst the Experts and the Chairperson shall serve in such capacity for the duration of his or her appointment unless the Boards otherwise determine.

Selection Criteria

64. The Experts shall be nationals of members of the Bank or State participants in the Fund and shall be selected on the basis of their knowledge of Africa, their experience, expertise, integrity and ability to act independently. In making these appointments, the Boards and the President shall pay due regard to maintaining a reasonable degree of diversity of expertise, experience, nationality and gender.

Term of Experts

65. Except for the first three (3) Experts, who shall be appointed by lot for non-renewable terms of three (3), four (4) and five (5) years respectively, Experts shall be appointed to the Roster for a non-renewable term of five (5) years. If an Expert is engaged in a compliance review at the time the Expert's term expires, the term shall be extended for such period as may be necessary to complete the compliance review, unless the Board removes the Expert in accordance with paragraph 72.

Restriction on Bank Group employment

66. An Expert shall not have worked for the Bank Group (either as a staff member, Bank official, Executive Director, Alternate Director, Executive Director's Assistant or Adviser or consultant) for at least two years prior to being appointed to the Roster, and, if called upon to work for the CRMU during his or her term, shall not be entitled to work for the Bank Group (either as a staff member, Bank official, Executive Director, Alternate Director, Executive Director's Advisor or Assistant or consultant) for a period of two years after the expiry of his or her term.

Capacity of Experts

67. When performing CRMU functions, Experts shall serve in their individual, personal capacity and shall be subject to the same privileges and immunities, relevant Code of Conduct provisions, conflict of interest rules and confidentiality provisions as experts performing missions for the Bank Group. Experts shall be required to act impartially and independently and shall not participate in a compliance review of any Request related to a matter in which they have or had a personal interest or significant involvement in any capacity. Experts shall not interfere in the political affairs of members of the Bank nor shall they be influenced in their deliberations or decisions by the political character of the member(s) concerned. Experts shall immediately disclose to the Director:

(a) any circumstances which might be deemed to affect their impartiality or independence in the discharge of their CRMU functions; and

(b) any attempt to interfere with or improperly influence the discharge of their CRMU functions.

No communications by Experts

68. Except as authorized by the Boards or the President, as the case may be, Experts shall refrain from making any statement, whether private or public, to parties other than the Requestors and any interested person on matters under consideration by the CRMU. Nothing in this paragraph shall prevent an Expert from undertaking any type of public consultation that he or she considers necessary as part of a compliance review or problem-solving exercise, as the case may be.

Training of Experts in Bank Group matters

69. Experts shall be required to attend meetings organized by the Director for at least five days in each calendar year to enhance their knowledge of the Bank Group's policies, procedures and operations and to discuss the functioning of the CRMU. The Director shall notify the Experts of any such meetings and shall set the agenda.

Access to documentary records

70. The Experts shall have full access to such documentary records maintained pursuant to sub-paragraph 61(d). Whenever an Expert obtains additional materials in the course of a compliance review, the Expert shall immediately provide a copy of such material for safekeeping in the documentary record.

Replacement of Experts

71. If an Expert appointed to a Panel to conduct a compliance review resigns or is unable to complete such assignment, the Director shall make a recommendation to the Boards through the President on a proposed course of action to ensure the prompt completion of the compliance review.

Removal of Experts

72. The Boards may remove Experts from the Roster at any time for cause.

IX. Conduct of CRMU Proceedings

a. Proceedings generally

73. All CRMU inquiries, assessments, reviews and exercises shall be carried out as expeditiously as possible without compromising the integrity or comprehensiveness of such process. The Director and Panels shall take due account of the need to include any Bank staff, Requestors and any other interested persons who may have relevant information. The Director and Panels shall take care to minimize the disruption to the daily operations of all involved parties.

b. Additional expertise

74. The Director and/or a Panel shall be entitled to seek additional expertise to assist with an inquiry, assessment, review or exercise, if this is necessary for the successful performance of their duties and responsibilities. The CRMU shall first determine whether the relevant expertise is available from within the Bank Group without compromising the independence of the process. If such expertise cannot be made available due to a conflict of interest, or an appearance of a conflict of interest, the expertise may be sought externally, provided that the selection and appointment of any consultants, researchers, interpreters, translators and/or other technical experts shall:

(a) be made, to the extent possible, with due regard to the Bank Group's procurement rules regarding the selection and appointment of consultants and in consideration of the short time periods within which tasks requiring external expertise are to be completed;

(b) be made under the supervision of the Director; and

(c) be subject to the availability of the necessary budgetary resources.

c. Access to staff and information, and confidentiality

75. When conducting any inquiry, assessment or review for a problem-solving exercise or a compliance review, the Director or a Panel shall have full access to relevant Bank Group staff and files, including electronic files, cabinets and other storage facilities and Bank staff shall be required to cooperate fully with them. However, the access to, and use and disclosure of, any information gathered by the Director or a Panel during any such process shall be subject to the Bank Group's Disclosure of Information Policy, any requests by an interested person for confidentiality and any other applicable requirements to keep sensitive commercial information confidential (such as a confidentiality agreement). No CRMU officer, Expert, staff member, consultant, researcher, interpreter, translator and other technical expert employed by the CRMU may release a document, or information based thereon, which has been provided on a confidential basis without the express written consent of the party who has provided such document.

d. Legal matters

76. The General Counsel shall, upon request, provide all legal information and advice needed in respect of the Bank Group's policies and procedures and the Bank Group's rights and obligations in respect of the Bank Group-financed project to which a Request relates.

X. General Provisions

a. Annual report

77. The Director shall prepare the Annual Report describing the activities of the CRMU during the preceding year, including a discussion of any identifiable trends relating to the activities of the

Bank Group that have emerged from the CRMU's problem-solving exercises and compliance reviews and of the lessons that the CRMU has learnt about the impacts and challenges in implementing the Bank Group's operating policies and procedures.

78. The Annual Report shall be prepared in consultation with all the Experts on the Roster and shall be submitted to the Boards and the Boards of Governors for information, and shall be published on the Bank Group's website.

b. Budget

79. The Bank Group shall provide such budgetary resources as shall be sufficient to allow all of the activities permitted by these Rules to be carried out. The Director shall prepare an annual budget indicating the level of resources required to carry out its mandate.

c. Business Days

80. Any reference to 'days' in these procedures shall be deemed to be a day on which the Bank Group is open for business in its principal office.

d. Immunities and Privileges

81. Nothing contained in these Rules shall be deemed to be a waiver by the Bank or the Fund of the immunities and privileges conferred by the Agreement establishing the African Development Bank, the Agreement establishing the African Development Fund, the Agreement establishing the Nigeria Trust Fund and the agreements establishing any other Special Funds administered by the Bank.

e. Amendment and effect of the Rules

82. The Boards may amend these Rules. These Rules shall prevail in the event of any inconsistency between these Rules and any other Bank Group document and in the absence of an express provision to the contrary.

ANNEX 2

CRMU Outreach Strategy

INDEPENDENT REVIEW MECHANISM
African Development Bank Group

CRMU Outreach Strategy

1. **The objective:** The outreach activities of the Compliance Review and Mediation Unit (CRMU) aim at raising awareness of the existence and the functioning of the Independent Review Mechanism (IRM) and to equip communities affected by Bank financed projects with the knowledge and skills to engage in a constructive dialogue with the Bank and, if felt necessary, to access and benefit from the IRM.

To realize its outreach objective, CRMU has set various goals and strategies: The primary goal is to sensitize and equip Civil Society Organizations (CSOs)[1] to pass on information to local communities. To attain that, CRMU provides information to CSOs to enhance their knowledge of accountability issues and fosters dialogue amongst them with the aim of building strong networks of CSOs that share common goals. CRMU also emphasizes the importance of civil society consultation and engagement in the project cycle, and induces Bank staff, Project staff and government officials to inform project beneficiaries about the IRM. To enrich its work, CRMU seeks to learn from the experiences of CSOs and other Accountability Mechanisms to improve and extend its outreach activities. Finally, CRMU continuously reports on and evaluates the IRM activities to align its activities with the needs and expectations of different stakeholders.

2. **The approach:** To reach out to local communities affected by Bank-financed projects, CRMU applies a multi-channel approach and a wide variety of instruments. The various channels inter alia include Bank staff, CSOs and Governments, all of which are likely to intercommunicate with projects' affected communities. The manifold instruments developed by CRMU to raise awareness and increase the knowledge of the IRM range from various publications to customized workshops, seminars and meetings. The latter events are designed to facilitate the exchange of experiences and ideas as well as a way to establish networks on accountability issues.

Since it has become operational, CRMU has produced brochures in five languages (English, French, Arabic, Portuguese and Kiswahili), an e-newsletter published quarterly in English and French and developed the IRM's website (www.afdb.org/irm) accessible in both English and French and incorporated in the Bank's homepage. The IRM website includes information about the mechanism, the registry of requests which includes compliance review reports and decisions taken by the President or the Boards, IRM rules and procedures, links to Bank policies and a news and events section inter alia reporting on CRMU outreach activities.

In 2009, CRMU plans to expand its instruments by a staff-oriented brochure and an information kit directed at CSOs for use in their dialogue with local communities. Moreover, CRMU is presently advocating the inclusion of information about the IRM as mandatory to project documents such as Project Appraisal documents (PA), Environmental and Social Impact Assessment (ESIA) and legal lending/grant Agreements.

For complete list of the instruments deployed by CRMU in its outreach efforts and their status please refer to annex 1.

3. **Partners:** CRMU cooperates internally and externally in order to create synergies to maximize its outreach goals. Internally, CRMU coordinates and jointly organizes workshops and seminars with different Bank's Divisions and Departments such as the Integrity and Anti-Corruption Division, the NGO Coordinator (OSUS), Operations Evaluations (OPEV), the Department for Governance, Economic and Financial Reform (OSGE) and Country Offices. CRMU also cooperates with relevant national authorities and Accountability Mechanisms from other International Financing Institutions such as the World Bank Inspection

[1] In the present paper the term CSO is used synonymously with Non-Governmental Organization (NGO).

Panel, the Compliance Advisor Ombudsman of the International Finance Corporation (IFC), the Inspector General of the European Investment Bank (EIB) and the Accountability Office of the Overseas Investment Corporation (OPIC).

4. **Challenges**: In the course of implementing its outreach strategy, CRMU faces several challenges, among which are: identifying affected local communities living in remote projects' areas, language barriers and low literacy rates in certain areas. This is in addition to the cultural and social issues, notably the community and/or tribal structures which influence the effectiveness of reaching out to the potential beneficiaries of the mechanism. Local communities often encounter difficulties to access general information about Bank projects and policies, partly because of their constrained internet access and the limited dissemination of information about Bank's operations at the local level. Furthermore, the experience of CSOs' work with accountability issues is yet at its infancy, possibly compounded by the reluctance of both CSOs and the Bank to engage in a constructive dialogue. Another crucial challenge for CRMU is to build trust among the affected communities and the Bank staff in the IRM.

CRMU tries to overcome these challenges by constantly evaluating and improving existing outreach instruments and by tailoring new ones. However, in order to be effective, CRMU depends on the support of all stakeholders, especially Bank staff, CSOs and Governments to engage in a regular dialogue with CRMU, to share experiences and ideas, and to pass on information about the IRM to project affected communities and the public at large.

For further details please refer to the CRMU website.

List of outreach instruments

Instrument	Description	Directed at	Status
Website	The website includes information inter alia about the IRM, Bank policies and News and Events	Public	Accessible in English and French and updated regularly
Brochures	The brochures contain information about the objective and scope of the IRM as well as its main procedures	All stakeholder	Available in English, French, Arabic, Portuguese and Kiswahili
e-Newsletter	The e-newsletter informs about current activities of CRMU and gives CSOs the opportunity to publish their own activities in the Community News section	CSOs	Published quarterly since June 2008
Information kit	The information kit intends to produce easily understandable and illustrated information about the objective, the scope and the availability of the IRM for CSOs to pass on to communities	CSOs Communities	Forthcoming in 2008
Staff brochure	To be determined	Bank staff	In process
Media	Media products that inform about the IRM in general or specific CRMU activities	Public	Interviews, Press Releases, COMU “Bank in Action”
IRM information in project documents	To be determined	All stakeholder	Included in internal legal documents; intended to expand for PA, ESIA etc.
Workshops	CRMU presents the IRM and its procedures and/or the Bank Group’s policies and learns from CSOs’ experiences	CSOs	10 workshops carried out in RMCs, with 380 CSOs participating
Seminars	In seminars CRMU presents the IRM its scope and procedures	Parliamentarians and government officials	1 seminar attended by 30 parliamentarians, 2 seminars for government officials
Staff training	Through staff trainings CRMU introduces Bank staff to the IRM, emphasizes the importance of civil society engagement and induces bank staff to inform about the IRM	Bank staff	9 presentations given to management and staff
IFI meetings	The Accountability Mechanisms of the major International Financing Institutions meet annually to discuss common problems and to find adequate solutions	CRMU	Realized through workshops; planned to be expanded in the future

Instrument	Description	Directed at	Status
Network building	CRMU forges a network on accountability issues among committed CSOs	CSOs	Realized through workshops; planned to be expanded in the future
CSO database	Database compiled by CRMU that holds the main contacts of CSOs interested in accountability issues	CRMU	Continuously updated; established in 2008

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