The Independent Review Mechanism
Annual Report 2016



IRM
Independent Review Mechanism
MI Mécanisme indépendant d'inspection

AFRICAN DEVELOPMENT BANK GROUP

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Acronyms and Abbreviations

ADB	African Development Bank
ADF	African Development Fund
ADA	Agricultural Development Agency of Morocco
AfDB	African Development Bank Group
AWSB	Athi Water Services Board
CDRT	Centre de Développement de la Région de Tensift
CSOs	Civil Society Organizations
CRMU	Compliance Review and Mediation Unit
ESAP	Environmental and Social Assessment Procedures
ESIA	Environmental and Social Impact Assessment
GRMs	Grievance Redress Mechanisms
IACD	Integrity and Anti-Corruption Department
IAMs	Independent Accountability Mechanisms
IRM	Independent Review Mechanism
ISS	Integrated Safeguards System
KCCA	Kampala City Council Authority
KURA	Kenya Urban Roads Authority
MAFO	Bank Country Office in Morocco
MAP	Mediation Action Plan
PAPs	Project Affected People
PIUs	Project Implementation Units
RAP	Resettlement Action Plan
TANROADS	Tanzania National Roads Agency



Foreword



The Independent Review Mechanism (IRM) achieved its objectives in 2016. The end users of the IRM benefited from both its problem-solving and compliance review functions. For example, remedial actions undertaken through sustained involvement of the IRM over the past few years have helped 500 households and six villages with improved access to water supply and the restoration of agricultural lands damaged by the construction of the Marrakech - Agadir Motorway project in Morocco.

The complaint about this case has now been resolved. Payment of adequate compensation for losses of assets and income to 3,618 people and business owners affected by the Road Sector Support Project II in Tanzania was made. The increasing demand for the IRM compliance review function by civil society organizations (CSOs) is evident in the growing number of complaints. The trend is an important indication of stakeholders' trust and interest in seeing that Bank Group financed operations are more influenced by participatory approaches and stakeholder engagement in respect of development in Africa.

The complainants and the CSOs are to be commended for their continued cooperation with the IRM. The Bank Management and the borrowers' commitments towards fulfilling the remedial actions were also instrumental in redressing the plight of the affected people. The new Spot Check Advisory Review of Project Compliance function of the IRM that enables an investigation to be triggered about a project from within the Bank is proof positive of institutional learning. The first advisory review report issued in 2016 informed Management about certain infringements to Bank Group policies and procedures applicable to the Tanzania Road Sector II project, and underscored the need to make our clients fully aware of the Bank Group safeguards policies.

I was pleased with the joint outreach activities we co-organized with those Departments in the Bank responsible for civil society organizations (CSOs) and Environmental and Social Safeguards. Without prejudicing the independence of the IRM, these events show the Bank's commitment to engaging with CSOs and its full appreciation of the importance of safeguards-related issues.

In our vision, the mandate of the IRM, which is to give redress to people who have been adversely affected by projects financed by the Bank Group, is central to the High 5 priorities of the Bank[1] and is aimed at improving the living standards of people of Africa. Consequently, we will work with Management and put greater emphasis on the accountability of Bank Group financed operations in the context of the New Development and Business Delivery Model. The positive contribution of the IRM will encourage the promotion of a high quality and effective compliance culture across the new organizational structure.

SEKOU TOURE, DIRECTOR, BCRM

1Light up and Power Africa, Feed Africa, Industrialize Africa, Integrate Africa and Improve the Quality of Life for the People of Africa



1 Executive Summary

The Compliance Review and Mediation Unit (CRMU) received four new Complaints in 2016 while it closely monitored the implementation of the remedial action plan prepared by Management to bring two projects subject to complaints into compliance with the Bank's policies and procedures. In addition, two cases were closed, making the problem-solving approach useful not only for the Bank but also for the complainants with the satisfactory resolution of their grievances.

Problem-solving activities covered six requests. Two of five complaints were resolved and closed to the satisfaction of the Requestors. A new complaint was received, while three ongoing requests achieved the milestones of their progress.

The CRMU observed a steady increase of complaints submitted by civil society organizations (CSOs) for compliance review. A case in point concerns the three new requests relating to Bank-financed projects in Mali, Senegal and Guinea. The Mali case concerns a private sector project, the Modern Mills. The Boards of Directors approved the complaint's eligibility assessment report which had recommended that the project undergoes a compliance review. The Senegal case also relates to a private sector project, the Sendou Coal Power Plant. The IRM undertook the request eligibility assessment mission.

Finally, a case in Guinea relates to a public sector operation, the Multinational Road Development and Transport Facilitation Programme within the Manu River. The CRMU carried out the preliminary assessment and registered the request.

Meanwhile, the IRM monitored the implementation of the Management Mitigation Action Plans for two requests registered in 2010 and 2007 respectively, and relating to energy projects financed by the Bank Group in South Africa and Uganda. For South Africa, the IRM Experts completed the desk review for the second IRM monitoring of the Medupi Power Project.

The IRM Experts assessed the sixth supervision report on the implementation of the Management Action Plan with a view to bringing the project into compliance with the Bank's policies and procedures. In Uganda, the Management Mitigation Action Plan for the Bujagali Hydropower and Interconnection Projects was to all intents and purposes completed.

The Road Sector Support Project II in Tanzania underwent the newly established Spot Check Advisory Review of Project Compliance, and the Boards of Directors approved the recommendations of the Spot Check Report on 23 November 2016.

The planned outreach activities were completed. These comprised a national workshop, a community session as well as a staff seminar in Burkina Faso and finally a staff seminar in Senegal. In addition, the IRM webpage was revamped while outreach materials were disseminated to Bank country offices and Bank operations complexes, CSOs and project implementation units. Finally, the CRMU's communication strategy was finalized.

The IRM recognized some challenges for compliance with the Bank safeguard policies during this year. From handling the complaints and undertaking the spot check, the CRMU noticed the pressing need to familiarize the Requestors, the Bank staff and the projects sponsors with the IRM Rules to enhance their capacity to engage with the mechanism's processes in an effective way.

MANDATE OF THE IRM

The Independent Review Mechanism (IRM) provides people adversely affected by a project financed by the African Development Bank Group (AfDB) with an independent mechanism through which they can request the AfDB to comply with its own policies and procedures. The IRM intervenes when people or communities affected submit a complaint. In this way, the IRM can be considered as a recourse instrument for project affected people who have previously been unable to resolve their problems with the AfDB's Management. The IRM is administered by the Compliance Review and Mediation Unit of the Bank (CRMU).

SPOT CHECK ADVISORY REVIEW OF PROJECT COMPLIANCE

In addition to handling complaints submitted by people affected by Bank Group financed projects, the IRM was authorized by the Boards of Directors in 2015 to undertake an advisory function, which consists of Advisory services provided by CRMU and Spot-check advisory reviews of project compliance undertaken by the IRM Experts.

At the beginning of each calendar year, CRMU will select not more than two (2) high-risk (environmental and social) on-going projects on which the IRM Expert will conduct spot-checks to assess the Bank Group's compliance with its policies and procedures.



2 The Handling of Complaints



2.1 Complaints Handled Through Problem-Solving

2.1.1 Introduction

The CRMU handled six Requests through Problem-Solving. One new Request was received, registered and under assessment, while three on-going Requests were managed and two were closed to the satisfaction of the Requestors.

The beneficiaries of Problem-Solving Remedial Actions in 2016 included: 500 households and six villages by providing improved access to water supply and the restoration of agricultural lands which were damaged by the Construction of the Marrakech – Agadir Motorway, Morocco; and payment of compensation to 3618 people and business owners affected by the Road Sector Support Project II in Tanzania.

The objective of the Problem-Solving Exercise is to help the complainants, the project promoters and the Bank (the parties) to find mutually agreeable solutions to the problems raised by the Requestors.

The Director of the CRMU facilitates these exercises and monitors the implementation of the resulting Remedial Action Plans agreed by the parties. The objective of these plans is to redress the damage caused to people affected by the projects (PAPs) and/or the environment.



2.1.2 New Requests

Technical Program to Promote Youth Agri-business Employment Program (JEA), Morocco

The Complaint about this project was submitted to the CRMU in September 2016 by the Agricultural Engineers and Technicians Association, which represents trainers who stand to benefit from the JEA program.

The total cost of the project is Euro 685,000, financed by both the Bank and the Government of Morocco. The Boards of Directors approved this project in 2012 to be implemented for a period of 24 months.

The primary concern of the complainants is that the Agricultural Development Agency (ADA) of Morocco, the project's executing agency, had engaged them in training activities delivered by UNOPS under this program, presumably to help them access finance to establish their small businesses.

The complainants accused the ADA of abandoning them after they had prepared the required feasibility studies. In their view, the ADA action undermined both the program and its objective, to promote agri-business, as well as the government's strategy to create 'fast-track" youth employment.

The complainants argued that some of the trainees had left their jobs to join this program and others had rented agricultural lands in anticipation of having access to the finance facilitated by the JEA program. They asked the Bank Country Office in Morocco (MAFO) to assist in resolving these issues.

A copy of the same Complaint had been received earlier by the CRMU from MAFO. In its follow-up with MAFO, the task manager informed the CRMU that the Bank financed two components of the program, that is, the training and the preparation of business plans, while the ADA and the other credit agency were responsible for facilitating the access to finance. Subsequently, in July 2016, the CRMU received formal communication from the task manager that included a signed attestation by the ADA and the Requestors that the issue had been resolved.

The CRMU communicated this information to the Requestors who reacted only in September 2016 with another letter complaining that their access to finance was still outstanding. The CRMU has planned a mission to Morocco in the first quarter of 2017 to explore solutions to the concerns raised by the Requestors.

2.1.3 Ongoing Requests

The Outer Ring Road Project, Kenya

The CRMU registered the Request relating to this project for both Problem-Solving and Compliance Review on 07 October 2015. The Boards of Directors had approved the project loan of UA 86,400,000 on 13 November 2013. The project was classified as Category I high risk due to its negative impacts on people. The Request was submitted by open-air traders claiming that the Kenya Urban Roads Authority (KURA), the project implementation unit, had excluded them, without consultation, from the list of those eligible for compensation despite the fact they had operated their businesses in the project area for between seven (7) and twenty (20) years.

The Request was the second submitted by these complainants. The first, received by the CRMU in 2014, had not been registered because the complainants had not presented their concerns to the Bank Management before communicating with the CRMU, as required under the previous IRM Operating Rules and Procedures of 2010. Nevertheless, the Director of the CRMU facilitated discussion between the complainants, KURA and the Bank. As a result, in June 2014, the parties informed the Director of CRMU that KURA had agreed to consider payment of compensation to the complainants. However, on 14 September 2015, the CRMU received the second Request with the information that KURA had not fulfilled its commitments and the complainants were still not on the list of individuals to be compensated.

In its response to the second Request, the Bank Management referred to the agreement between KURA and the PAPs, including the complainants. The agreement indicated that the Requestors were not only eligible for compensation, but they were also to represent other PAPs in the Project Grievance Redress Mechanism. Thereafter, the Director of the CRMU received formal communication from the Requestors confirming their satisfaction with the outcome of this agreement. With the Request already registered, the CRMU will carry out a mission in the first quarter of 2017 to confirm the fulfillment of this agreement by KURA, formally close the Request and submit the Report on the Closure of this Problem-Solving Exercise to the Boards of Directors. In line with the IRM Rules of 2010, the Director will also submit the Request to the IRM Experts to assess its eligibility for Compliance Review.

The Nairobi River Rehabilitation and Restoration Program: Sewerage Improvement Project, Kenya

The CRMU registered this Request for problem-solving on 09 July 2015. The project loan of UA 39.87 million was approved by the Boards of Directors on 06 December 2010. The project was classified as Category 1 high risk, due to its potential negative impacts on both the environment and people.

The Requestors are two affected families who claimed that the Nanchang Sewerage Company in charge of building the sewerage lines had installed pipes through their private compound. They claimed to have suffered material damages and health problems, and despite of their repeated demands for compensation, they never received a response from the Athi Water Services Board (AWSB), the project implementation unit.

The complainants feared the contractor would leave the site without completing the repair works. The Management Response to the Request submitted to the CRMU on 06 August 2015 included several remedial actions, which the CRMU monitored. Subsequently, the Director of the CRMU received formal communication from the AWSB, the Bank and the Requestors that maintenance works had been carried out to the satisfaction of the complainants. Since the Request had already been registered, the Director of the CRMU will carry out a follow–up mission in the first quarter of 2017 to confirm that the Requestors are satisfied, that the Request can be formally closed, and submit the Report on the Closure of this exercise to the Boards of Directors.

WHO CAN FILE A COMPLAINT

The CRMU can receive requests for recourse from to or more persons (such as community of persons, an organization, society or other grouping of individuals) or by a qualified representative of the affected persons. Requestors have to demonstrate that their rights or interests have been or are likely to be adverserly affected by the non-compliance with the relevand Bank Group Policies.



The Improvement of Health Services Delivery at the Mulago Hospital and in the City of Kampala, Uganda

The CRMU registered this Request for problem-solving on 17 March 2014. The Boards of Directors had approved this project on 6 July 2011, at a cost of UA 56 million. The project was classified as Category 2 due to its minimal environmental and social impacts.

The Requestors are an affected family who claim that the Government had forcibly acquired their late father's clinic in the 1970s and rehabilitated it into Mulago hospital without providing compensation. The Requestors questioned the accuracy of land title records presented by the Government to the Bank during the approval of the loan for the hospital's rehabilitation. On 07 August 2015, the Management Response to the Request was submitted to the CRMU, and confirmed that the Bank had verified the land titles presented by the Government prior to the project's approval, and had followed proper due diligence processes.

The CRMU conducted a fact-finding mission to Uganda from 07 to 09 May 2014, and reported the outcome to the Boards of Directors on 04 June 2014. The Parties agreed to a problem-solving initiative. Consequently, the CRMU undertook a follow-up mission to Uganda from 17 to 19 February 2015 to compile records from both the family and the Government. Despite several attempts by the CRMU to reconcile the parties, the Government and the Requestors are still in disagreement on the authenticity of the Land Registry records relating to the plot where the hospital is being built.

The CRMU reported this stalemate to the Boards' Committee on Operation Effectiveness (CODE) in July 2016. The Committee invited Bank Management to organize further follow-up consultations with the Government.

The CRMU also followed up with the complainants and the Bank to keep the parties engaged. But the Government responded by maintaining that the Kampala City Council had purchased the disputed lot of land from the mother of the Requestors (now deceased). The Director of the CRMU will carry out a follow up mission to consult again with the Government and the Requestors in an ultimate attempt to resolve this stalemate within the completion phase of the project.



2.1.4 Resolved and Closed Requests

The CRMU closed two cases in 2016

Construction of the Marrakech Agadir Motorway, Morocco

The first related to the Construction of the Marrakech – Agadir Motorway Project in Morocco which has been under the CRMU monitoring for the last four years. Reports on the case can be found at: www.afdb.org/irm.

The case submitted by the Centre de Développement de la Region de Tensift (CDRT) on behalf of the PAPs who lived along the Chichaoua-Imintanout section of the Motorway was registered for problem-solving and compliance review on 29 July 2010. The problem -solving exercise of this Request was formally closed in April 2016. Through this process, 500 households and six villages had improved access to water supply and saw the restoration of agricultural lands which were damaged by the project. The implementation of these mitigation actions were made possible because of the strong engagement of CDRT.

With regard to the Request's eligibility for compliance review, the IRM Experts submitted their independent assessment to the Boards of Directors in January 2012. They found the Request ineligible for Compliance Review. At the end of the problem solving process, the Requestor sent its own evaluation of the Problem-Solving Exercise to the CRMU in December 2015.

Road Sector Support Project II, Tanzania

The CRMU received the Request relating to Road Sector Support Project II (RSSP II) on 5 June 2012, two months after the Boards of Directors approved the project. The RSSP II costing UA 212.8 million is co-financed by the Bank (UA 140.00 million), the Japan International Cooperation Agency (JICA) (JPY 7,659,000,000.00) and the Government of Tanzania (USD 8.43 million). The Government contribution covers the compensation of the PAPs who live along the three sections of the road to be upgraded by the RSSP II, namely, Dodoma-Babati, Tunduru-Mangaka and Mangaka-Mtambaswala. The RSSP II was classified as a Category I high risk due to its potential negative impacts on people and the environment.

The Requestors are two nationals living on the Dodoma-Babati road section, who claimed to hold formal land titles but were forced by the Tanzania National Roads Agency (TANROADS), the project implementation unit, to demolish their houses without compensation. This is because TANROADS considered their properties as illegally built on the Road Reserve, a situation which presumably affected many other people living along the road.

The Management Response to the Request submitted to the CRMU on 23 July 2012 included an Action Plan prepared by TANROADS and the Bank to resolve the PAPs' problems of compensation. Under this plan, TANROADS agreed to withdraw the demolition notices and submit proof of compensation of the PAPs to the Bank prior to the commencement of construction works.

The first Mediation Meeting organized by the CRMU on 18 October 2012 culminated in the signing of a Settlement Agreement and an auxiliary Mediation Action Plan (MAP) by the Requestors, the Bank and TANROADS. The MAP included timelines for the payment of compensation to the Requestors and the other PAPs affected by RSSP II, as well as the operationalization of the Grievance Redress Mechanisms (GRMs). The CRMU recruited an independent consultant to monitor the implementation of the MAP.

The 1st Monitoring Report, issued in May 2013, established that TANROADS had withdrawn the demolition notices but with delays in establishing the GRMs and the valuation of affected properties. Consequently, the CRMU's second Mediation Meeting held on 18 June 2013, updated the timelines of the MAP, and facilitated TANROADS' disclosure of compensation amounts, as determined by the Land Valuer, to the Requestors, who accepted these amounts.

The 2nd Monitoring Report, issued on 26 March 2016, focused on the compensation of PAPs on the other two sections of the road (i.e.,Tunduru-Mangaka and Mangaka-Mtambaswala). The report highlighted several issues comprising:

- The arbitrary depreciation of value of affected properties;
- The non-compensation of informal businesses for loss of income because they did not have audited accounts; and
- Numerous pending cases before the GRMs.

At the CRMU's third meditation meeting held on 15 July 2016 attended by the Requestors, the Bank and TANROADS' Chief Executive, the Request was closed in light of the TANROADS' and Bank's commitments to address and monitor the aforementioned issues, as well as the Requestors' satisfaction with the outcome of the Problem-Solving Exercise.

Complaint Relating to the Construction of the Marrakech Agadir Motorway, Morocco

Issues Resolved by the Problem-Solving Exercise

- Damage to houses due to blasting and separation of communities from their Mosque by the motorway in Douar (village) Sidi Mohamed Samba;
- Lack of road crossing infrastructure in Bouafiren – Chichaua, part of the Chichuaoua –Imintanout road section;
- Lack of road crossing infrastructure and disruption of water course and runoff in Douar Jdida and Douar Hssain;
- Lack of road crossing in Douar Talmest and Mellal;
- Degradation of land due to flooding from the valley in Douar Imiliine (Commune de Oued El Bour) since the gravelling of the valley diverted the normal water course; and
- Destruction of water sources and inadequate road crossing at Douar Taliint.

2.2 Complaints Handled Through Compliance Review

In 2016, the CRMU registered three new Requests for compliance review. It also monitored the implementation of the Management Action Plans for two Requests relating to energy projects financed by the Bank Group in South Africa and Uganda received by the CRMU in 2010 and 2007 respectively. The objective of a compliance review is to determine whether people have suffered, or are likely to suffer harm from a project as a result of non-compliance with the Bank's safeguards policies and procedures at any point from design to completion including if the project is still under consideration for financing.

The Compliance Review is undertaken by the IRM Experts with four sequential steps: (i) assessment of the eligibility of the Request for compliance review; (ii) on approval by the Boards of Directors, investigation to establish whether or not the harm suffered resulted from non-compliance with Bank policies and procedures; (iii) preparation of a Compliance Review Report with recommendations on mitigation actions to be undertaken by Bank Management to bring the project into compliance with Bank policies and procedures; and (iv) monitoring of the implementation of Management Action Plans.





2.2.1 New Requests

Multinational-Road Development and Transport Facilitation Program within the Mano River Union–Guinea Section

The Multinational-Road Development and Transport Facilitation Program within the Mano River Union (covering Côte d'Ivoire, Guinea and Liberia) was approved by the Boards of Directors on 18 December 2014. The loan to Guinea for $ 11,774,000 was to be used to pave the 39.75 km dirt road from Lola City to the border of Cote d'Ivoire at the Gouéla Post. Roadworks were expected to start at the end of the rainy season in October 2016 and to be completed over 20 months. The project was classified as Category 1 high risk, due to its potential negative impacts on both the environment and people.

On 15 September 2016, the CRMU received a Complaint relating to this Program, and specifically to the Guinean section of the road. The Complaint was submitted by two Guinean nationals who work for Agroforestry Resources Unlimited (ARU), a non-governmental organization focusing on environmental protection and governance.

The Requestors raised several issues:

- The irreparable harm the project will cause to the people and the environment, claiming that the project will damage the ecosystem that provides the people on this section of the road their livelihoods;
- The violation of both national and international laws; specifically that the roadworks and clearance will occur within the boundary of the Nimba Mountains Strict Nature Reserve, a World Heritage Site (WHS) and a core area of the Nimba Mountains Biosphere Reserve (NMBR), which is protected by both Guinean law and the International Convention for the Protection of Cultural and Natural World Heritage, ratified by Guinea;
- The inadequacy of the Environmental and Social Impact Assessment of the project in February 2013 (ESIA) as it did not consider the statutory protection of the Nimba Mountains;
- The lack of public consultations as required by Guinean law;
- The partial nature of the ESIA in terms of baseline characterization;
- The inadequate assessment of potential impacts and the relevant mitigation measures; and

- The violation of the AfDB's Integrated Safeguards System of December 2013; most notably, Operational Safeguards 1 and 3 on 'Environmental and Social Assessment' and 'Biodiversity, Renewable Resources and Ecosystem Services'.

The CRMU conducted the preliminary review of this Request and established that it meets the criteria for registration under the IRM Operating Rules and Procedures of 2015. The CRMU registered the Complaint on 28 November 2016.

The Bank Management Response to the Request was received on 27 December 2016. The CRMU and the IRM Experts will undertake a Request eligibility assessment mission in 2017.



Construction of a 125 Mw Coal Sendou Power Plant, Senegal

The CRMU received two Requests relating to the Sendou Power Plant Project negative impacts on the people in the villages of Bargny and Minam as well as the environment. The Boards of Directors approved this private sector project on 25 November 2009.

The total cost of the project is Euro 164,610,732, and the Bank loan is Euro 49,392,473. The project is a public-private partnership initiative co-financed by the Banque Ouest Africaine de Developpement (BOAD) and the Netherlands Development Bank (Nederlandse Financierings-Maatschappij voor Ontwikkelingslanden N.V. (FMO).

The project is classified as Category 1 high risk in accordance with the Bank's previous Environmental and Social Assessment Procedures for the Private Sector Operations 2001, which was applicable before the Bank's Integrated Safeguards System that came into effect in July 2014. The first Request was submitted to the CRMU on 09 May 2016 on behalf of various PAPs by Takkom Jerry, and Lumière Synergie pour le Développement, two national civil society organizations (hereinafter referred to as, "the First Requestors").

The Requestors asked the CRMU to handle their Complaint through both problem-solving and compliance review. During the preliminary review of this Request, on 15 July 2016, the CRMU received the second Request sent by two individuals, Mr. Cheikh Fadel Wade and Mr. Daouda Gueye, on behalf of other members of the communities in Bargny (hereinafter referred to as "the Second Requestors"), challenging the representational authority of the First Requestors to act on behalf of all the PAPs. The Second Requestors asked for a Compliance Review of the project. Needing to clarify the representational authority held by the Requestors as stipulated in Paragraph 14 of the IRM Operating Rules and Procedures, the CRMU carried out a preliminary assessment, including a field mission to Senegal. The CRMU established that both Requestors fulfilled the requirements by providing the CRMU with written signed proof that they act on behalf of PAPs. The First Requestors also confirmed their desire to see their Request handled through compliance review.

The two Requests raised the following complaints about the Sendou coal power plant:

- Inadequate public consultations with PAPs;
- Breach of the AfDB's environmental, social and human rights standards since no compensation was paid to the majority of owners who proclaimed to hold land titles within the site of plant;
- No Resettlement Action Plan was prepared to mitigate the project's negative social impacts;
- The selection of the project site violates article L13 of the National Code of the Environment, with the Sendou plant site being less than 2kms from an existing cement factory and another forthcoming larger capacity (250MW) coal-fired power plant to be built close to this site;
- The increased vulnerability of communities to air pollution and potential disruption of their livelihoods because of the proximity of the coal power plant to the town's water supply, public facilities (including the elementary school, a health center, a kindergarten, cemetery) and the only fishery product processing site that employs about 1000 women and other seasonal and temporary workers;
- Health risks from air pollution due to emissions from the Sendou plant, the cement factory and the other coal-fired power plant planned close to the same site, with no cumulative impact assessment study prepared to measure the effects of emissions from these three plants;



- The adverse impact of the coal power plant on a historic heritage site which houses a tree believed in as protecting the spirit of the village and a nursery for the regeneration of marine biodiversity; and
- The increased vulnerability of the community to the consequences of coastal erosion.

Since the two Complaints relate to the same project and raise similar issues, the Director of the CRMU decided to combine them into one Request but engage the Requestors separately in the process. After the assessment of the two Complaints, the CRMU determined that the Requests fall within the mandate of the IRM and meet the registration criteria of the IRM Operating Rules and Procedures. The CRMU registered the Complaint on 05 August 2016 for compliance review and received the Management Response to the Request on 4 October 2016.

The IRM Experts and the Director of the CRMU conducted the eligibility assessment of the Request in Senegal from 24 to 30 November 2016. The Eligibility Report is now under preparation and will be submitted in the first quarter of 2017 for consideration by the Boards of Directors. The compliance review is also planned for the second quarter of 2017, if authorized by the Boards of Directors. The investigation will determine whether or not harm has been, or is likely to be caused to people due to the project's non-compliance with the Bank policies and procedures.



The Diversification of the Activities of the Modern Mills Project in Mali

On 23 September 2015, the CRMU received the Request relating to the Diversification of the Activities of Modern Mills Project (the M3 Project) in Mali through the Integrity and Anti-Corruption Department (IACD) of the AfDB. The Complaint was also addressed to the Bank Group's Board of Governors. The Request was submitted by Afrique-Europe Interact, an international NGO with local representation in Mali. The Boards of Directors approved this project on 23 June 2014, with a senior loan of EUR 16.8 million. The Borrower is a limited liability company established in 2007 and belonging to the Group Keita. The project components include the installation of units for the production of couscous and pasta, and includes silos for the storage of raw materials (hard wheat, soft wheat, maize, millet and sorghum), as well as three mills for the production of meal and flour to be used to supply production lines. The M3 Project is classified as Category 2 medium risk.

In 2016, the CRMU determined the eligibility of the Request for compliance review and registered it in the IRM Register of Requests.

The Requestor complained about a number of issues:

- Land grabbing by the project, with those inhabitants of Sanamadougou and Sahou villages who had refused to leave their agricultural lands at the beginning of the project, allegedly subjected to serious violations of their rights and threats to their physical security;
- A number of the PAPs were not compensated while some others received only symbolic compensation amounts for their lands and properties; and
- The Bank loan was granted to the M3 Project on two conditions; first, that no proceedings about the project were pending before the courts, and second, that the families affeted had received financial compensation. The complainant accused the M3 Project of having received the Bank loan by deliberately providing misleading and/or fraudulent information that there was no court case, and that all the villagers had received their compensation when in fact only a small number of families (8) had received what is referred to as merely symbolic compensation.

The Requestor included in its Complaint a list of PAPs with their signatures and asked that this list be compared with any list submitted by the M3 Project to the Bank.

The CRMU conducted a preliminary assessment of the Request, discovering that the land dispute between the M3 Project and the PAPs may have been pending before the national courts; however, it was unclear from the Request whether or not the legal cases were still pending or had been resolved.

The IRM Operating Rules and Procedures prevent the IRM from handling matters before national courts. In addition, it was also unclear if the NGO had obtained representational authority to act on behalf of the PAPs.

Therefore, with such uncertainty surrounding the court cases and representational authority, the CRMU did not register the Request in the first instance.

FUNCTION OF THE IRM

The IRM handles requests through Compliance Review (investigation) and Problem-Solving (mediation). The IRM perform an advisory function which consists of Advisory services and Spot-check advisory reviews of project compliance. The compliance review and Spot-check advisory reviews of project compliance are undertaken by a Panel of Independent Group of Experts (The IRM Experts). CRMU undertakes the problem-solving exercises, Advisory services and outreach activities to fulfill its mandate and to contribute to the overall objectives of the AfDB.

The CRMU continued with the fact-finding exercise to gather additional information regarding this project. By March 2016, the CRMU received confirmation that the court proceedings had been closed by the time the Request was sent to IACD and later transmitted to the CRMU.

Given the circumstances surrounding this project, the Director of the CRMU determined that the Request meets the registration requirements of the IRM Operating Rules and Procedures, pending clarification of whether the PAPs had given full authority to the international NGO to duly represent them. The Request was finally registered for compliance review on 12 May 2016.

The Bank Management Response to the Request expected by the CRMU by 13 June 2016, was received on 22 August 2016.

The IRM Experts and the Director of the CRMU conducted the eligibility assessment of the Request in Mali from 20 to 26 June 2016.

During this mission, the PAPs selected two of them to stand on their own behalf in this case, while continuing to receive technical advice from the international NGO that originally submitted the Request to the CRMU. On 23 November 2016, the Boards of Directors approved the IRM Eligibility Report and authorized the IRM to conduct a compliance review of the M3 Project.

The investigation will determine whether or not a harm has been, or is likely to be caused, as alleged by the Requestors, due to the project's non-compliance with the Bank Group's applicable policies and procedures. The Compliance Review will be undertaken in the first quarter of 2017.



2.2.2 On-going Cases under Monitoring

The Medupi Power Project in South Africa

In 2016, the IRM continued it monitoring activities of the Medupi Power Project. The IRM started the handling of the complaint about this project on 28 September, 2010 when it received the Request and registered it on 07 October, 2010 for compliance review. The Request raised the following issues:

- The project non-compliance with Bank safeguards policies;
- The negative impact of the Bank's loan on South Africa's carbon reduction commitments;
- The burden of hidden costs due to public health risks resulting from emissions will be borne by the communities living near the Medupi plant;
- Corruption and conflict of interests;
- Inadequate consultations ; and
- The project will benefit large corporations rather than the poor.

On 15 July 2011, the Boards of Director approved the investigation of four of the six issues raised by the Requestors. (The issue of corruption and conflict of interests as well as South Africa's carbon reduction commitments were referred to other competent departments of the Bank).

The IRM started its investigations in August 2011 and submitted the Compliance Review Report to the Boards of Directors on 24 January 2012 for consideration.

The document was discussed on 19 September, 2012, together with the Management Response and Action Plan. On 13 February 2013, the Boards adopted the Management Action Plan and authorized the annual monitoring of this Plan by the IRM.

The IRM undertook the first monitoring in 2015, after the desk assessment of Management's supervision reports in November, 2014 and the field mission between 10 and 16 May, 2015.

The IRM prepared its First Monitoring Report, which was adopted by the Boards of Directors on 26 November 2015. The Report highlighted those areas needing improvement as well as the challenges that Management faced in its efforts to address the issues raised by the complainants. These included:

- Reducing the risk to public health from emissions;
- Strengthening supervision missions;
- Completing regional impacts assessments;
- Complying with Integrated Water Resources Management Policy;
- Improving consultation with the communities; and
- Addressing the desecration of graves and other heritage issues.

The work in 2016 focused essentially on the planning of the second monitoring of the status of implementation of the Management Action Plan and a desk review of two progress reports (5th and 6th updates), on the implementation of the Plan in the wake of Management's supervision missions of November 2015 and July 2016 respectively.

The assessment of these reports is required as part of the compliance review process as outlined in the IRM Operating Rules and Procedures.

The two reports indicated significant achievement with respect to the mitigation actions being implemented, including improvement in the consultation with affected communities and in finding a lasting solution to heritage issues related to the graves.

The Operations Phase Environmental Management Plan (OPEMP) was finalized and approved by the Department of Environmental Affairs in 2015. The Regional Cumulative Impact Environmental and Social Assessment (RESA) study between Botswana and South Africa was finalized and due to be presented to the Government of South Africa for adoption in June 2016.

The IRM will verify the information provided by Management during its second monitoring mission of the Medupi Project to South Africa, scheduled for the first quarter of 2017.

The Boards of Directors of the Bank Group approved a loan, not to exceed the aggregate sum of EUR 930 million and ZAR 10.63 billion, for the supply and installation of six boilers and turbo-generators for the project on 25 November 2009.

The total cost of the Medupi Power project was estimated at EUR 11.19 billion (UA 10.18 billion).

The project involves the construction of a 4,764 MW coal-fired base-load power plant in Lephalale, Limpopo Province, South Africa. It will be the fourth largest coal-fired power plant in the world. The Medupi project is classified as Category 1 high risk, due to its potential negative impacts on people and the environment.

The Bujagali Hydropower and Interconnection Projects in Uganda

No substantive work was done in 2016 by the IRM in monitoring the Bujagali Projects. The Complaint about the Bujagali Projects was submitted by the Ugandan National Association of Professional Environmentalists, a Non-Governmental Organization.

The complaint was registered on 16 May 2007 for compliance review. After subjecting the project to all the steps of the compliance review process, the IRM received the project completion reports after a long delay in May 2016 and is assessing the final status of resolution of the issues at the origin of the complaint.

The Bujagali Hydropower Project, approved by the Boards of Directors on 02 May 2007, was developed by the private company, Bujagali Energy Ltd. (BEL). BEL constructed a 250MW run-of-the-river power plant on a Build-Own-Operate-Transfer basis at the Bujagali Falls on the Nile River near Jinja, (about 8 kms downstream from the existing Nalubaale and Kiira hydropower stations).

The Bujagali Interconnection Project is a public-sector project closely associated with the Bujagali Hydropower Project and was approved by the Boards of Directors of the African Development Fund (ADF) on 28 June 2007. The project provides the transmission infrastructure to interconnect the new Bujagali Hydropower Station to the national electricity grid.





The Hydropower project cost was estimated at US$ 750 million, with the African Development Bank (ADB) providing a loan of US$ 110 million (UA 73.8 million equivalent). The total cost of the Interconnection project was estimated at UA 50.13 (US$ 74.7 million equivalent) with the ADF loan of UA 19.21 million (US$ 28.6 million).

In 2016, the IRM received the Project Completion Reports for both Bujagali projects from Bank Management, that is, the Extended Supervision Report for the Bujagali Hydropower Project and the Completion Report for the Bujagali Interconnection Project. These two reports were to address the unresolved compensation issues which were pending following the IRM monitoring of the Management Action Plan which was approved by the Boards of Directors in May 2009. This Action Plan contained the mitigation actions proposed by Management to address the instances of non-compliance as recommended by the IRM Experts Compliance Review Report which was adopted by the Boards of Directors on 9 July 2008.

It was in the context of the IRM monitoring of this Action Plan that the Experts undertook four field missions to Uganda and submitted the respective monitoring reports to the Boards of Directors and the President. The 4th IRM Monitoring Report issued on 09 October 2012 recommended the Bank to ensure that the outcomes of remaining compliance issues relating to resettlement and compensation be included in project completion reports.

The Report concluded that if the IRM, after assessing project completion reports finds them to have satisfactorily addressed the outcomes of compensation and resettlement issues in the two projects, then the IRM will undertake no further monitoring of these projects.

The Bank Management was to submit to CRMU the project completion reports by end of 2013. They were only received in May 2016 because of the extension of the projects. While assessing the outcome of the remedial actions to address the resettlement and compensation issues to enable them to close the case, the IRM Experts were made aware of additional complaints submitted about the same projects to other Independent Accountability Mechanisms (Inspection Panel of the World Bank, Compliance Advisor Ombudsman of the International Finance Corporation (IFC) and the Complaints Mechanism of the European Investment Bank (EIB).

The IRM Assessment Report will be submitted in due course to the Boards of Directors.

The Complaint raised the following, among other issues:

- Inadequate social and environmental impact assessment;
- Inadequate consultation with the affected communities;
- Inadequate compensation;
- Dam safety; and
- Interference with cultural heritage.


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3 Spot-Check Advisory Review of Project Compliance

3.1 Introduction

The IRM was mandated to undertake the advisory services including the spot check function on 28 January 2015, when the Boards of Directors approved the amendments to the Resolution and the Operating Rules and Procedures of the IRM.

The key objective of this function is to enhance institutional learning and to promote a culture of compliance in the Bank. The advisory function involves advisory services carried out by the CRMU, and spot-check advisory review of project compliance (the Spot-Check Advisory Review) undertaken by the IRM Experts. The main objective of the spot-check exercise is to draw lessons from the experience of the IRM for the purpose of advising Bank Management on compliance issues associated with high-risk projects. In other words, beyond handling individual Requests, the IRM Experts also undertake investigations under the spot-check function. These spot-check reviews examine whether or not there has been an infringement of any Bank Group operational policies and procedures in the design, appraisal and/or implementation of a project. However, unlike the Compliance Review, the spot-check investigation is initiated internally within the Bank.



3.2 The Guidelines on the Operational Procedures for the IRM Advisory Function

In adopting the amended IRM Enabling Resolution (B/BD/2015/03 – F/BD/2015/02) approved by the Boards on 28 January 2015, the Boards expanded the mandate of the IRM to include an advisory role, and the Boards stressed the importance of clarifying the scope of the advisory function, and clearly outlining the procedures, especially for the new Spot-Check Advisory Review of Project Compliance, in order to avoid any conflicts of interest by the IRM Experts. Subsequently, the CRMU developed the Spot-Check Advisory Review of Project Compliance and Advisory Services (the Advisory Guidelines) to set out the operational procedures for the advisory function. The Advisory Guidelines include the scope of the advisory service and the modalities for conducting Spot-Check Advisory Review of Project Compliance. The Advisory Guidelines were circulated to Bank Management on 30 October 2015 and subsequently submitted in May 2016 to the Boards of Directors for information.
The two steps of initiating the spot-check process are:

- Each year, the CRMU in consultation with Management is to select not more than two high-risk projects (i.e., projects with potential adverse environmental and social impacts) to be subjected to spot-check review to assess whether these projects have complied with the applicable Bank Group policies and procedures; and
- Once the projects have been selected, the Director of the CRMU submits the list of these projects along with the Terms of Reference for the spot-checks to the Boards of Directors for consideration (in the case of approved projects) or the President (in the case of projects under Bank consideration for financing). One of the three Experts from the IRM Roster of Experts carries out the spot-check exercise each year.

3.3 The Spot-Check Advisory Review of Project Compliance: The Road Sector Support Project II, Tanzania

The spot-check process for the Road Sector Support Project II, (RSSP II) Tanzania started on 14 April 2016 when the CRMU and the Bank Management agreed to propose only one project, the Road Sector Support Project II in Tanzania, to undergo a Spot-Check Advisory Review of Project Compliance.

The RSSP II was selected for the spot-check exercise for three reasons. Firstly, this being the first spot-check exercise, there was need for a modest start-up with only one project to ensure a well-established practice for conducting future spot-check activities.

Secondly, the RSSP II is an infrastructure project classified as Category 1 in accordance with the Bank Group's policies and procedures. The spot check of project could lead to identifying broader procedural issues behind the recurrence of Complaints raised by PAPs about Bank financed transport sector projects particularly with regard to the involuntary resettlement caused by these projects.

Finally, this project had already been the subject of a Complaint which was handled through an IRM Problem-Solving Exercise. During this exercise, the CRMU had observed a number of instances of non-compliance with Bank policies and procedures that warranted further assessment.

An example is where compensation processes appeared to have overlooked the requirements of the Bank Policy on Involuntary Resettlement, with the result that the PAPs received less compensation than that provided for in the project documents (i.e. compensation schedules and valuation reports).

In addition, a large number of small businesses had been resettled without compensation because national legislation provides that compensation only be paid to relocate those businesses with audited accounts.

The Boards of Directors approved the proposed project for spot-check together with the Terms of Reference (TORs) for the Spot-Check Exercise on 04 May 2016.

Subsequently, the IRM conducted a desk review of project documents and a field mission to Tanzania, from 18 to 23 July 2016.

During this mission, the IRM Expert visited the project sites and interviewed the PAPs, the project promoter TANROADS, the local authorities, the Bank staff responsible for the project and other stakeholders. At the end of the spot-check exercise, the IRM Expert prepared a draft Spot-Check Advisory Review of Project Compliance Report and submitted it to Bank Management for comment on factual issues. The findings and recommendations of the Spot Check Report were adopted on 23 November, 2016 by the Boards of Directors. They, among other things, concluded that:

- The Bank followed the necessary due diligence process, and the RSSP II is largely in compliance with the Bank's Environmental Policy.
- The RSSP II is non-compliant with the Bank's Involuntary Resettlement Policy 2003. Most notably, the issuance of demolition notices to PAPs to remove their properties before payment of compensation, inadequate consultations with PAPs, non- compensation for loss of income for PAPs who had no formal land titles or owned small business which had no audited accounts, and the grievance redress mechanisms were not established at earlier stages of project's activities to address complaints from PAPs.
- The RSSP II also failed the Involuntary Resettlement Policy's by not conducting a gap analysis during project preparations to identify differences between the national laws and the applicable Bank Policies.
- The Bank guidance to the Borrower to implement Bank's safeguards was insufficient.
- The Spot-Check Report included project specific as well broader procedures recommendations which are meant to enhance institutional learning and compliance with Bank's safeguards policies. The recommendations, among others, included:
- The Bank should consider financing compensation costs for resettlement as part of its loans.
- The Bank should support Borrowers to implement the Bank safeguards standards, and to enhance Borrowers capacities to benefit from cross country- learning processes.
- In countries where the Bank has a large active portfolio in the road sector, the Bank should consider shifting from a strictly project based approach to a sector investment based approach. Investment financing would then be based on a sector investment program agreed upon with the government and preferably with other donors.

INFORMATION TO BE INCLUDED IN A REQUEST

- A reference to the project, stating all the relevant facts including the harm suffered by or threatened to the affected parties;
- How the parties have been 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;
- When requesting a compliance review, an explanation of how Bank Group policies, procedures or contractual documents were violated;
- An indication if there has been any previous communication between the affected parties and the Bank Group concerning the issue (s) raised in the Request ; and
- In Requests relating to matters previously submitted to the CRMU, a statement specifying what new evidence or changed circumstances justify revisiting the issue.

If some of the above information cannot be provided, an explanation should be included.



WHERE TO SEND A COMPLAINT

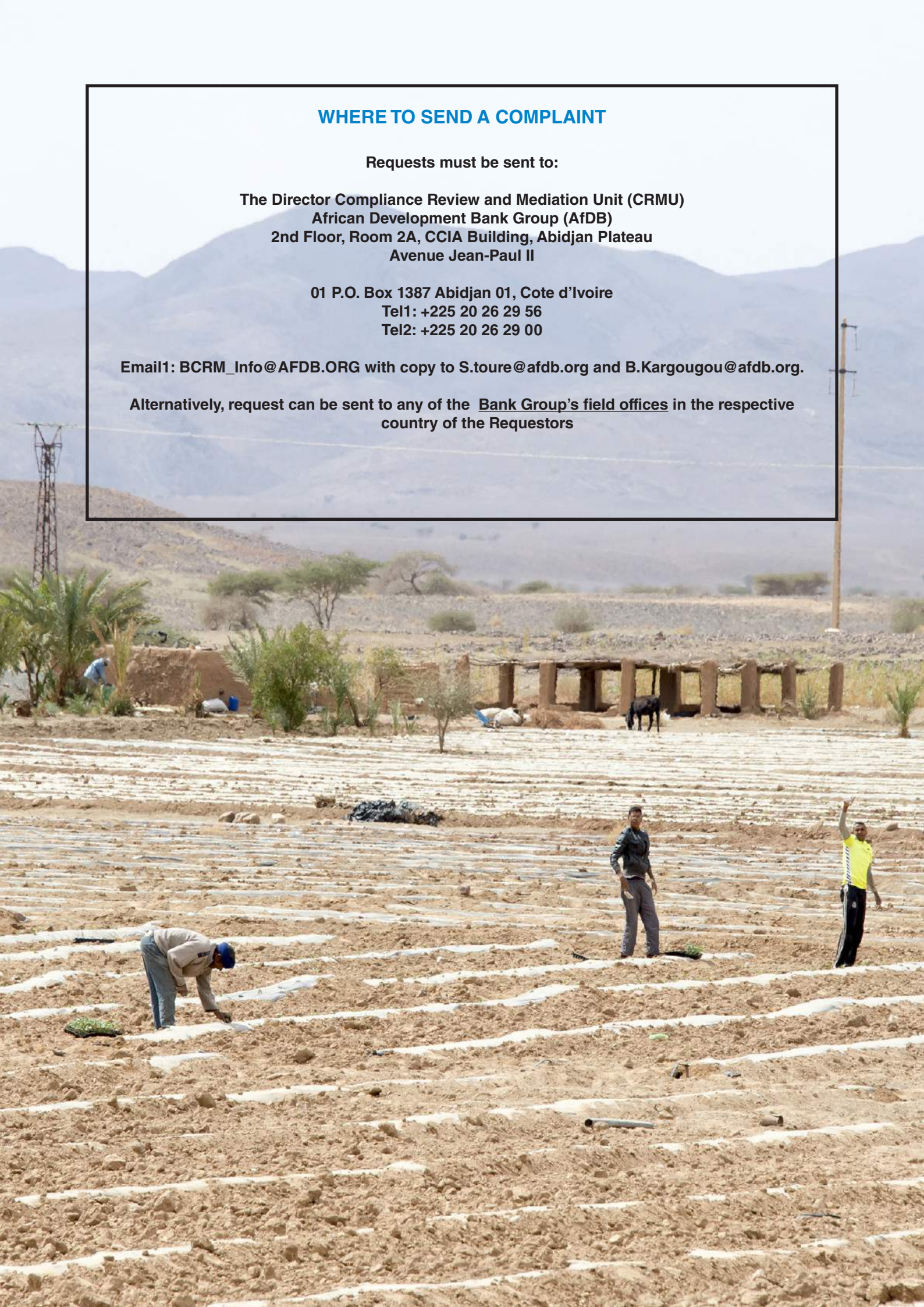
Requests must be sent to:

The Director Compliance Review and Mediation Unit (CRMU)
African Development Bank Group (AfDB)
2nd Floor, Room 2A, CCIA Building, Abidjan Plateau
Avenue Jean-Paul II

01 P.O. Box 1387 Abidjan 01, Cote d'Ivoire
Tel1: +225 20 26 29 56
Tel2: +225 20 26 29 00

Email1: BCRM_Info@AFDB.ORG with copy to S.toure@afdb.org and B.Kargougou@afdb.org.

Alternatively, request can be sent to any of the Bank Group's field offices in the respective country of the Requestors





4 Outreach Activities

4.1 Introduction

The CRMU implemented outreach activities in 2016 in order to raise awareness about the IRM. The sensitization activities targeted Bank staff and the Boards of Directors, project implementation units, civil society organizations (CSOs) and the media. These stakeholders were informed about the procedures and challenges associated with the IRM's handling of Complaints as well as the advisory services, so as to enhance institutional learning. The CRMU communication activities generated knowledge products, drawing on the experience and lessons emerging from Complaints handling. The 2016 activities included national and regional workshops as well as participation in region-wide consultations with CSOs.



4.2 Activities organized by the CRMU

Consultations with the Boards of Directors: The Director of the CRMU held bilateral consultations with the Members of the Boards throughout the year. These discussions allowed the Director of the CRMU to keep Board members fully informed of the activities of the IRM.

Staff Seminars in Bank Country Offices (Burkina Faso and Senegal): On 6 April 2016, the CRMU held a seminar for Bank staff in Burkina Faso with the participation of the Resident Representative. A similar session was organized for Bank staff in Senegal on 30 November 2016. The staff was briefed on the mandate, role and functions of the IRM and the CRMU under the IRM's Operating Rules and Procedures. A lot of emphasis was put in explaining the responsibilities of Management and project implementation units during the Complaints handling process.

The National Workshop and Community Session on the IRM in Burkina Faso: A national information dissemination workshop on the IRM was organized from 04 to 05 April 2016 in Ouagadougou. The session was attended by 73 participants consisting of representatives of CSOs, project implementation units, as well as representatives of the Ministry of Economy, Finance and Development (MiNEFiD). Discussion focused on the role of CSOs in the IRM process as well as areas of potential collaboration between CSOs, project implementation units, relevant government structures and the IRM.

Community Session with Resettled People in the village of Bassinko (Burkina Faso): The PAPs are the main focus of CRMU's outreach activities, hence the importance of direct interaction with them. The CRMU organized a community session with resettled people in the village of Bassinko in Burkina Faso. While there are recurrent issues of resettlement and compensation for people affected by AfDB financed projects, the session helped to identify the specifics of the Bassinko case. The resettlement of the people was undertaken in the context of the Ouagadougou large scale peri-urban Sanitation Project affecting about 332 families. The session on 6 April 2016 was attended by 65 people from affected families who complained about their living conditions, including the lack of water, school, and health center in their resettlement site, which had been promised by the project.

4.3 IRM Participation in other Events

The Annual Meeting of Independent Accountability Mechanisms (IAMs): The IRM was represented at the 13th Annual meeting of IAMs of International Financial Institutions held from 6 to 8 September 2016 in Manila and hosted by the Project Facilitator and Compliance Review Offices of the Asian Development Bank.

Regional Consultation Workshops: Partnering with Civil Society Organizations to deliver the Bank's High 5s in West Africa and Central Africa: A CRMU study indicates that 55% of the claims received were filed by CSOs, compared with 45% by individuals. This highlights the importance of the role of CSOs in the work of the IRM.

Accordingly, the CRMU joined the Bank department in charge of CSOs on 31 August to 2 September 2016 in Senegal in its regional consultations with CSOs in West African countries. The CRMU participated in a similar regional workshop with CSOs in Central Africa from 26 to 28 September 2016 in Cameroon. Attendance at the workshop in Senegal was 60 participants while that in Cameroon was 50. These regional workshops developed Bank-CSO joint work plans and strategy to deliver on the priorities of the Bank (High5s). The CRMU sensitized the CSOs during these events.

International Financial Institutions (IFIs) Working Group meeting on Information Disclosure and Stakeholder Engagement: The CRMU participated in the IFIs Working Group meeting on Information Disclosure and Stakeholder Engagement held at the Bank's headquarters in Abidjan, Côte d'Ivoire from 10 to 11 November 2016. In a panel discussion, the Director of the CRMU highlighted lessons emerging from the work of the IRM on project stakeholder engagement and grievance mechanisms.



4.4. Communication and Information Dissemination

IRM Webpage: One of the flagship actions of CRMU communication over this year has been the redesigning of the IRM web page on the AfDB website. The new webpage was launched in the wake of feedback received from CSOs, Requestors and other end users of the IRM. It is more user-friendly and will be regularly updated to facilitate access to IRM related information and improve CRMU and end-user engagement.

Dissemination of the IRM Rules and Annual Report: Dissemination of CRMU publications to all stakeholders continued. These publications include the new Resolution and Operating Rules of the IRM and annual report, which have been widely distributed to both external and internal stakeholders.

Communication: Communication plays a prominent role in helping the IRM to achieve its mission. The CRMU has carried out several outreach activities with its target stakeholders and produced a number of communication materials.

These were reviewed in 2016 and an updated strategy prepared on the communication activities and tools, with the following salient features:

New communication tools

- Non-traditional formats, including online webinar training sessions, social media, the use and possible development of web, mobile and smart phone applications and the production of videos of varying lengths for use in training sessions, on the IRM web homepage, on AfDB's homepage, and across various social media platforms.

Engaging strategically with stakeholders

- Establishing partnerships between CSOs and the AfDB from the outset is crucial.
- Further develop and articulate ways of engaging CSOs to ensure effective and lasting collaboration (e.g. establish a secretariat for CSOs; consider capacity building for CSOs).
- Create platforms to facilitate engagement between CSOs, governments and the AfDB.
- Engaging CSOs during community consultations ensures early and effective discussions with concerned parties within the community and identification of contentious issues.
- Monitoring and evaluation of AfDB engagement with CSOs and communities is needed.



5 Trends and Lessons



Important trends and lessons are emerging from the handling of Complaints and the new Spot-Check Advisory Review process. The following are the key trends and lessons observed:

- One of the new Requests registered in 2016 related to issues of technical support and cooperation opportunities in the agri-business industry. This seems to show diversification in the issues brought to the IRM, which until now have regularly identified inadequate public consultations, pollution, health, land and compensation.
- Compared to the number of Requests received directly from PAPs, the number of Complaints submitted by NGOs on behalf of these people continues to increase.
- The expectation of resolving the issues between project promoters and the Requestors is not always met. The attempt by project promoters to resolve Complaints prior to CRMU problem-solving intervention did not materialize because the Bank did not follow up with the Requestors to ensure that their problems are adequately addressed.
- Bank Management, project implementation units and the complainants participate genuinely and in good faith in the Complaint handling process. The response has been most encouraging in the number of Complaint cases handled through Problem-Solving.
- Problem-solving facilitated the resolution of the majority of Complaints. For example, in cases involving disputes over compensation,

the PAPs mostly do receive reparation in spite of the challenges associated with the discrepancies often observed between national legislation on compensation on the one hand, and relevant Bank policies on the other. That said, the implementation of possible or agreed upon solutions in some projects was challenging particularly in compensation cases.

- In most cases, the Bank's policies are not aligned with the national regulatory framework of the Borrower. However, in all the Complaint cases handled, these gaps were not properly identified and hence no mitigation measures were developed prior to project implementation. The absence of gap analysis results in the increasing risk of Bank policies and procedures being violated and the frustration of Borrowers when affected communities challenge these policies and procedures by submitting Complaints to the CRMU.
- CSOs serve as effective intermediaries between affected communities and the IRM. An increase in Requests for compliance review by CSOs indicates their familiarity with Bank safeguards requirements. • Attention of PAPs is increasingly focusing on climate change and environmental issues.
- Complaints about energy and transport sector projects continue to top the list of the Registry of Complaints. For example, out of the four Requests received by the CRMU in 2016, one was about a coal fired power plant and a second one concerned a road sector project, confirming a previously observed trend.
- Private-sector funded projects and staff familiarity with the IRM and safeguards issues need more focus. Requestors are increasingly demanding information about cases, processes and follow up, signaling the need to strengthen communication and engagement with them

ADVISORY SERVICES

The CRMU was authorized by the Boards of Directors to provide advisory services on 28 January 2015. These services are triggered upon receipt by the Director of the CRMU of a request for advice or technical opinion from the President and/or the Boards or upon approval by the President and/or the Boards of a proposal submitted by the Director of CRMU for such advisory service. The scope of the advisory service will be:

- Requests for advice must be consistent with the mandate of the CRMU and not be project-specific; and
- Upon the submission of a request for advisory services, the CRMU will prepare Terms of Reference that clearly outline the scope of the advice sought. These Terms of Reference will be attached to the Advisory Note to be sent to the President and/or the Boards, as the case may be.




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6 CRMU Staff



Mr. Sekou Toure,
Director

Mr. Toure was appointed as the Director of the Compliance Review and Mediation Unit on 02 January, 2013. Prior to joining the African Development Bank, Mr. Toure was the Conflict Resolution Commissioner at the Global Environment Facility (GEF). The GEF unites 182 member governments, in partnership with international institutions, civil society organizations (CSOs), and the private sector, to address global environmental issues. The GEF provides grants to developing countries and countries with economies in transition for projects related to biodiversity, climate change, international waters, land degradation, the ozone layer, and persistent organic pollutants. Reporting to the Chief Executive Officer of the GEF, Mr. Toure was responsible for providing advice and leadership on the resolution of conflicts and disputes relating to GEF partnerships.

To overcome major impediments in GEF operations, Mr. Toure facilitated dialogue among the GEF stakeholders to mitigate the adverse effects of GEF financed operations and helped to build consensus and confidence in the process of compliance with GEF policies. Mr. Toure had moved to the GEF after serving as Director of the Regional Office for Africa at the United Nations Environment Programme (UNEP) from February 2001 to 05 September, 2007. In this capacity, Mr. Toure led UNEP's engagement with the Africa Region, including the servicing of the African Ministerial Conference on the Environment and contribution to key initiatives such as the New Partnership for Africa's Development. Prior to his tenure at UNEP, Mr. Toure had assumed responsibilities in senior positions in the Government of Côte d'Ivoire.

These included Junior Minister in charge of Water Resources Management (Haut Commissaire à l'Hydraulique), Special Advisor to the State Minister in charge of Development Planning, and Special Advisor to the Prime Minister. In addition, Mr. Toure had major responsibilities in a local political party in Cote d'Ivoire for a number of years. While in Cote d'Ivoire, he gained extensive international experience and exposure in the field of environment and water resource management. He has contributed to the work of CSOs in Africa. Mr. Toure has extensive research and teaching experience from working in the USA (University of Cincinnati, Cincinnati, Ohio, University of New Hampshire, Durham, New Hampshire) and in Côte d'Ivoire (Institut National Polytechnique Felix Houphouet Boigny, Yamoussoukro and Universite d'Abobo Adjame, Abidjan). He has contributed more than twenty scientific and technical publications and has edited a scientific journal and a book. Mr. Toure holds a Ph.D. in Civil Engineering, specialized in Environmental Engineering from the University of New Hampshire, Durham, NH, U.S.A., a M.Sc. in Civil and Environmental Engineering from the University of Cincinnati, Cincinnati, Ohio, USA and a B.Sc. in Civil Engineering from the École Nationale Superieure des Travaux Public (School of Civil Engineering), Yamoussousokro, Cote d'Ivoire.



Mrs. Adila Abusharaf, Chief Compliance Officer

Mrs. Abusharaf joined the Bank in 2007 and was the Officer-in-Charge of CRMU between February and December 2012. In this capacity, she was in charge of the administration of the IRM, including the receipt and registration of Requests, the problem-solving (mediation) process, outreach activities, monitoring and preparing the CRMU's annual strategic work program and budget. Together with the IRM Experts, she determined the eligibility of Requests for compliance review and reported directly to the Bank Group's President and Boards of Directors.

She has over 17 years of experience in international development having worked with the International Development Research Center (IDRC), University of Toronto, and York University in Canada, as well as having held positions as Regional Program Officer at the Center of Arab Women for Training and Research based in Tunisia, and as a lawyer in Sudan. Her work and scholarly publications focus on foreign direct oil investment and dispute resolution, compensation and resettlement, local governance, peace building and conflict-resolution, and gender-equity. Her work on these issues covers Algeria, Cameroon, Egypt, Mauritania, Morocco, Nigeria, Senegal, Tunisia, and Sudan. She obtained her Doctorate in Juridical Sciences from the University of Toronto in 2000, on private international law of transnational litigation and dispute resolution of oil pollution claims.



Ms. Grace Kimani, Principal Compliance Officer

Ms. Grace Kimani joined the Bank in June 2009. She supports the Director of the CRMU in assessing Requests, conducting outreach activities, collecting and analyzing Bank policies and procedures applicable to Requests registered by the CRMU for compliance review, preparing problem-solving missions and meetings, providing technical support to the IRM Roster of Experts, and representing the CRMU in internal and external meetings. She has experience in environmental matters having worked for five years with the legal department of the National Environment Management Authority (NEMA) in Kenya. She holds a Master of Laws' degree (LL.M) in Environment and Natural Resources Management and a Bachelor of Laws degree (LL.B), both from the University of Nairobi. She holds a Postgraduate Diploma (with Distinguished Honors) in International Environmental Law from the United Nations Institute of Training and Research (UNITAR).

She also has a Certificate on Climate Change and Development (at Masters' Level) from the University of London in the United Kingdom. Her work experience has focused mainly on sustainable development, biodiversity conservation, climate change, hazardous waste/chemicals and environmental legislative drafting. She participated in drafting subsidiary legislation for Kenya in the conservation of biodiversity, water, waste, chemical, the management of zone depleting substance, and, noise and air pollution control.



Mr. Birima Fall, Senior Compliance Officer in charge of Information, Outreach and Knowledge Management

He joined the Bank in February 2016. He has the responsibility of coordinating communication activities ensuring that the mandate of the IRM is known to all stakeholders (Internal and external) and enhancing visibility of CRMU through outreach activities. He will also work with colleagues to ensure that data and knowledge are generated from problem solving, compliance and spot-check advisory reviews and advisory activities and adequately disseminated. He also support the other team members in better organizing their activities.

Before joining the Bank, Birima worked for nearly 3 years for the World Bank Group as Public Private Dialogue Specialist for West and central Africa and was based in Dakar. Prior to that, he worked for 7 years at World Wide Fund for Nature (WWF) West Africa office in Dakar as Director of communication, Marketing and Partnership. In his early career, he worked as political journalist at the first private radio in Senegal. He was consultant for many international and regional organizations like UNESCO, ILO, WAEMU (UEMOA, OneWorld, IUCN, Wetlands International on communication and advocacy. Birima holds a Master's degree in International Relations from the University of Sussex (Great Britain), Higher Diploma in journalism and communication from Cheikh Anta Diop University in Dakar (Senegal) and a Master's certificate in English Literature and civilization from Cheikh Anta Diop University in Dakar.

Ms. Bernadette Kargougou, Compliance Assistant



Ms. Kargougou joined the Bank in 2010 and was transferred to CRMU in 2015. As Compliance Assistant, she provides support to the Director, professional and administrative staff of the CRMU in the handling of Requests/Complaints, the organization of outreach activities and the monitoring of information received through the CRMU info. Prior to joining CRMU, Ms. Kargougou served at the Human Resource Department & at the Office of the President. She also worked for 20 years with the United Nations Development Programme (UNDP), the United Nations Office for Project Services (UNOPS) and the African Futures Institute and gained extensive experience in administration, events management, programme support, finance, human resources management and procurement. She graduated from the University of Technology of Burkina Faso and the Management College of South Africa and holds a degree in Business Administration.



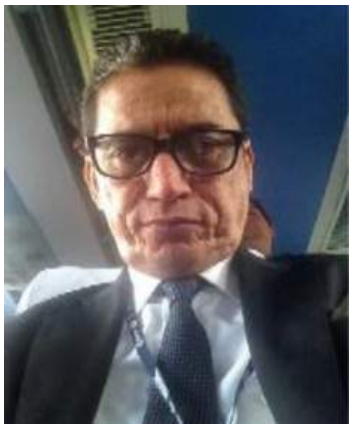
Mrs. Dede Jacqueline Djedjero, Administrative Assistant

Mrs. Djedjero joined the CRMU in April 2009 and as Administrative Assistant provides administrative support to the Director of the CRMU and to the IRM Experts. She is trained as a bilingual assistant and translator (English/French). She helps the CRMU with the translation of working papers and with proof-reading of translated reports and IRM Board documents. She provides support with procurement and logistical matters, payment of consultants and the IRM Experts and is the focal point of the CRMU's administrative budget management. She has wide experience in the Bank having worked with different departments, including operations where she worked for over 10 years and in the Human Development Department, comprising Health, Education and Poverty Alleviation.



Ms. Armelle Kokola, Secretary

Ms. Kokola joined the CRMU in September 2015 as Secretary. Her duties include providing administrative support to the Director of the CRMU and Staff in the coordination of missions, workshop as well as following up on procurement issues and other administrative duties. She graduated from Sight and Sound Education Ghana Limited, Ghana and holds a certificate in Conflict Management from CERAP-INADES, Abidjan. Before joining the Bank she worked for 7 years in the Private Sector.



Mr. Sidi El Moctar Cheiguer, Consultant

Mr. Cheiguer is a Senior Consultant in Communication with more than 30 years professional experience, including with several international organizations, World

Bank, European Union, UNICEF, UNEP and the African Development Bank. He is currently working for CRMU as a Consultant. He is the President of ANEJ, the African Network of Environmental Journalists, one of the most important Environmental organizations in Africa. Prior to that, Sidi Cheiguer was a journalist in Radio France International and BBC Africa based in Mauritania and served as Editor in Chief for both TV and National Radio of Mauritania. Mr. Cheiguer studied Journalism and Philosophy at the University UCAD in Dakar, Senegal in the eighties.



7 Members of the IRM Roster of Experts



Dr. Mafing Kondé, Member

Dr. Mafing Kondé was appointed on 06 February 2012, as a Member of the IRM Roster of Experts by the President and the Boards of Directors of the African Development Bank Group. Dr. Kondé holds a PhD in Development Sociology from the University of Paris X Nanterre, as well as a Diploma of Advanced Studies in Political Science from the University of Grenoble in France. He has almost thirty years of experience. Between 1984 and 1987, he worked as a lecturer at the University of Ouagadougou; Officer in Charge of Outreach for the Rural Water and Equipment Fund in Burkina-Faso; Sociology Research Officer in the Société africaine d'étude et de développement (SAED); and a Research Coordinator for many development projects in Burkina-Faso.

Some of these projects were funded by international organizations and European countries, such as the World Bank, Food and Agriculture Organization (FAO), and cooperation agencies of Denmark and the Netherlands. Thereafter, he joined Sahel-Consult as a sociologist where his work focused on water projects in Burkina-Faso. Since 1988, Dr. Kondé has been working as an independent consultant and has undertaken various assignments in Burkina-Faso and other West African countries including Niger, Mali, Cote d'Ivoire and Ghana for different international and national organizations: the World Bank, the International Union of Conservation of Nature (IUCN), the Danish Development assistance (Danida), the Italian Government, the United Nations Development Program (UNDP), the United Nations Children Fund (UNICEF), the United Nations-Women, the German International Cooperation Agency (GTZ), the Austrian Development Cooperation, the Swiss Cooperation, the Millennium Challenge Account (MCA), the Inter-States Group of Schools (ETSHER), as well as the Ministries of Agriculture, Water Resources and Environment of Burkina-Faso.

These assignments covered a wide range of research and development projects including research and work on the preparation, implementation and monitoring of projects in various sectors, local planning and development plans, environmental and social impacts studies, displacement and resettlement plans, and outreach activities. More specifically, his areas of specialization throughout his career have been in the analysis of land and water related issues, the implementation of decentralization and agriculture development, as well as participatory management of natural resources. Dr. Kondé is a member of different national and international associations such as the Land Research and Action Group (GRAF), the Association of Independent Consultants and Partners (ACIA), the International Center for Sociological and Applied Law Studies (CINESDA) and the National Anti-Corruption Network (RENLAC). For the purpose of assignments related to his membership to these associations, he has travelled to Turkey, Thailand, Greece and Nigeria.



Dr. Arntraud Hartmann, Member

Dr. Arntraud Hartmann was appointed on 01 June 2012, as a Member of the IRM Roster of Experts by the President and the Boards of Directors of the African Development Bank Group. Dr. Hartmann holds degrees in Law and Economics (Hamburg University and the American University) and Diplomas in International Relations and International Finance (Harvard University and John Hopkins University). She has more than 30 years of professional experience in development cooperation gained from working with several international organizations.

Dr. Hartmann spent twenty-three years working for the World Bank, where she held senior management positions. She was Country Director for several southeast European countries, Senior Advisor to the Managing Director and established the first Country Office of the World Bank in Romania in 1991 where she was the World Bank's first Country Manager and Chief of Mission. Prior to that, she held several positions for the World Bank as a Principal Economist for West African Countries and as Country Economist for Pakistan. In 2002 and 2006, Dr. Hartmann was a Senior Advisor to the Secretariat of the World Commission on the Social Dimensions of Globalization established by the ILO in Geneva, and was the Director of the Economic Policy Forum and International Institute for Journalism of InWent, in Berlin, Germany. Since then, she has been a member of the Quality Assurance Review Process of IFAD, and has undertaken numerous consultancies for the World Bank, the International Monetary Fund and the German Federal Ministry for Economic Cooperation and Development, the German International Cooperation Agency, GTZ and the International Fund for Agriculture.

Dr. Hartmann is an Adjunct Professor for Development Economics at the School of Advanced International Studies, Johns Hopkins University, Bologna, Italy, and a visiting professor at the Hertie School of Governance, in Berlin, Germany where she regularly teaches. She is a Senior Fellow at the European Research Centre for Anti-Corruption and State Building, in Berlin, Germany. She undertakes research with the Brookings Institution on aid effectiveness and has published extensively together with Johannes Linn, on "Scaling up of Development Programs". In addition, she has published on Public Sector Performance Measurement, Poverty Reduction Policies, Aid Effectiveness and Structural Adjustment Programs.



8 Financial Matters

Year	Activities	Original Budget	*Adjusted Budget	Actual
2016	**Meetings-Bank Business**	114,544.51	119,984.51	8,880.23
	Représentation	5 940,00	500,00	-
	***Missions**	60 961,82	100 961,82	54 313,19
	***Consultancy**	18 720,00	116 720,01	48 981,85
	***Salairies**	440 131,00	493 382,54	462 281,81
	TOTAL :	**640 297,33**	**831 548,88**	**574 457,08**

*Adjusted through transfers within the internal orders.
*Missions of CRMU Staff and the IRM Experts.
*Consultancy fees of IRM Experts and other consultants.
*Salaries of regular and short term staff.



9 Annexes

ANNEX 1: IRM Register of Requests by December 2016:

No.	Date Registered	Country	Project	Registered for	Issues	Status
1	28 Nov. 2016	Guinea	Multinational: Road Development and Transport Facilitation Programme within the Manu River Union	Under assessment for compliance review	• Degradation of eco system. • Inadequate impact assessment. • Compensation and cultural heritage sites issues.	Notice of Registration issued. Eligibility assessment mission for compliance review scheduled in 1st quarter 2017.
2	10 Aug. 2016	Senegal	Project: Construction of a 125 MW coal Sendou Power Plant	Compliance review	• -No resettlement action plan prepared. • -Inadequate consultations. • -Encroachment on livelihoods. • -Health risk due to emissions.	Eligibility mission completed 30 November 2016. Eligibility Report under preparation and Planning for compliance review mission completed.
3	12 May 2016	Mali	Diversification of the Activities of Modern Mills Project in Mali	Compliance review	- Compensation. -Encroachment on livelihoods. -No resettlement plan.	compliance review of the project was approved by Boards on 23 Nov 2016 and investigations will be carried out in 1st quarter 2017.
4	07 Oct. 2015	Kenya	The Outer Ring Road Project	Problem-solving and Compliance Review	Compensation	Resolved. Review for compliance review.
5	09 July 2015	Kenya	Nairobi River Rehabilitation and Restoration Program: Sewerage Improvement Program	Problem-Solving	Compensation	Resolved, to be closed in 2017
6	07 Mar. 2014	Uganda	Improvement of health service delivery at Mulago Hospital and in the City of Kampala	Problem-Solving	(1) Compensation (2) Inadequate due diligence in project approval procedures	On-going,

7	25 June 2012	Tanzania	SRoad Support Project II	Problem-solving	(1) Resettlement (2) Compensation	Closed to the satisfaction of the Requestors on 16 July 2016
8	26 July 2011	Senegal	Dakar-Diamniadio Highway Project	Problem-solving	• (1) Resettlement • (2) Compensation	Request successfully closed in December, 2012
9	07 Oct. 2010	South Africa	Medupi Power Project	Compliance Review	(1) In adequate Consultations (2) Disruption of livelihoods (3) Air pollution, and constrained access to water (4) Climate Change	2nd Monitoring of Management Action Plan is on-going.
10	29 July 2010	Morocco	Construction of the Marrakech-Agadir Motorway Project	Problem-solving and Compliance Review	(1) Constrained access to water, social amenities, (2) Damage to houses due to blasting, (3) Degradation of agricultural land, (4) Limited number of overpasses	Closed to the satisfaction of the Requestors on 16 October 2016, request found ineligible to undergo compliance review in January 2012.
11	22 July 2009	Ethiopia	Gibe III Hydroelectric Power Project	Compliance Review	(1) Inadequate consultation (2) Loss of livelihood (3) Negative environmental impact (4) Negative transnational impact on Lake Turkana	Closed - Request deemed ineligible for compliance review as AfDB did not finance this project.
12	15 July 2009	Egypt	Nuweiba Combined Cycle Power Plant Project	Problem-solving	(1) Potential Loss of Livelihoods (2) Negative Socio-cultural Impact (3) Road Safety (4) Damage to Marine Environment (5) Inadequate public Consultation	Closed - Mediation exercise discontinued and problem-solving report submitted to the President and the Boards in March 2010 because the Government of Egypt decided to relocate the project.
13	26 Mar. 2017	Ethiopia	Gibe III Hydroelectric Power Project	Problem-solving	(1) Inadequate consultation (2) Loss of livelihood (3) Negative environmental impact (4) Negative transnational impact on Lake Turkana	Closed – As the Ethiopia Government withdrew its request for funding the project from the Bank.
14	04 June 2007	Uganda	Bujagali Hydropower and Interconnection Projects	Compliance Review	(1) Resettlement (2) Compensation (3) Environmental damage (4) Cultural and Spiritual issues (5) Dam safety (6) Inadequate Economic analysis.	Monitoring of Management Action Plan is on-going. Management has submitted to the IRM the Project Completion Reports. Expected to be closed in 2017.

ANNEX 2: RECEIVED REQUESTS, BUT NOT REGISTEREDAS AT DECEMBER 2016

No.	Request Received	Country	Project	Issues	Reason for Non-Registration
1	June 2016	Tunisia	Name of project not provided by complainants butis in the oil sector	-Water pollution. -Access to farms blocked by the oil company. -Locals not hired to provide labour to the company.	CRMU could not registered the complaint because the Requestors did not provide the name of the project to enable CRMU to follow-up. CRMU tried to reach the Requestors through their e-mail addressed failed.
2	June 2016	Kenya	ADB/GoK Education III Project at Kitale Secondary School	Non-completion of the project which stalled immediately after it was started.	CRMU forwarded the request to the Department in charge of Education in the Bank for Follow-up with the complainants.
3	June 2016	Morocco	Youth Agri-business Entrepreneurship Program	Denial of access to credit facility (finance) for implementing business plans developed under a training financed by the Bank	The Bank was not involved in providing credit to the people trained. Therefore the CRMU could not register the request. However, CRMU tried to facilitate dialogue between the Bank County Office in Morocco and the Government of Morocco to see if the government can assist the Requestors to access the credit.
4	December 2015	Sierra Leone	Addax Bioenergy Project	Land issues, understanding the causes and effects of the development investment and support to local communities	Request was not registered, The Bank recovered its loan and was no longer involved in the project. CRMU facilitated dialogue between the requestors, the NGO that submitted the claim and the Bank.
5	September 2015	Mali (NB: This case was registered in 2016 after CRMU received additional information from the Requestors)	Moulin Moderne du Mali	Resettlement, compensation	At the time, the complaint did not fulfill the criteria for registration of the Request. The Request made some reference to the involvement of the national courts .Paragraph II, b. 2.d: CRMU is not authorized to receive Requests relating to matters before other judicial review or similar bodies. Due to the uncertainties of the standing of the Mali case, CRMU is investigating to determine the eligibility of this request.
6	April 2015	Nigeria	Urban Water and Sanitation Improvement Project in Oyo and Taraba States	Allegation of presentation of fraudulent documentation during Procurement Process in Oyo State	The complaint is beyond the scope of the IRM. It was referred to ORPF procurement department and the Director of Integrity and Anti-corruption Department (IACD) for action.
7	March 2015	Democratic Republic of Congo	The Rural and Peri-Urban Electrification Project	Compensation	Request related to a project that the Bank is not financing. IRM Operating Rules and Procedures of 2015 mandate the IRM to handle only requests relating to projects under consideration for financing or financed by the Bank Group.
8	November 2014	Republic of Congo	Support to the Evaluation of the Poverty Reduction Strategy Project	Private company claiming payment by government for work done	The Bank Management and the Government of the Republic of Congo through dialogue facilitated by CRMU are currently handling the complaint. The CRMU did not register this request in line with Paragraph III (b) of the IRM Rules which describes the people who can file a request to the IRM.

9	July 2014	Kenya	Olkaria Geothermal project	Resettlement and compensation	AfDB is not financing this project and therefore, CRMU could not register it.
10	April 2014	Kenya	Outer Ring Road Project	Resettlement and compensation	Previous IRM Rules of 2010 required the requestors to approach the Bank to resolve issues prior to submitting their complaint to the IRM. Paragraph III.b.5.e required the requestors to provide in the text of the complaint a description of the steps taken by the affected parties to resolve the problem with Bank Group staff, and explanation of how the Bank Group's response was inadequate unless the Requestor(s) have requested confidential treatment pursuant to paragraph 8 of the IRM Rules; This requirement is overruled by the new IRM Rules of 2015.
11	2014	Republic of Congo	Projet d'appui au système de suivi et d'évaluation de la stratégie de réduction de la pauvreté.	Facilitation	Request for CRMU Problem-Solving approach to assist in settlement of contract
12	2012	Senegal	Public Road Project	N/A	Complaint successfully handled by Senegal Field Office (SNFO) in line with IRM Rules 2010 Paragraph III.b.5.e as stated above.
13	2012	Kenya	Public Road Project	N/A	Complaint successfully handled by Kenya Field Office KEFO in line with IRM Rules 2010 Paragraph III.b.5.e as stated above.
14	2012	Madagascar	Mining Project	N/A	Request made by only 1 (one) individual and rejected since IRM Rules of Para.III.3.a.4.(a) stated "the CRMU has authority to receive Requests 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.
15	September 2010	South Africa	Power Project	N/A	Complaint relating to corruption referred by CRMU to Integrity and Anti-Corruption Department (IACD). The old IRM Rules of 2010 Para. II.b. ii stated that: "CRMU is not authorized to receive Requests relating to: fraud or corruption".
16	2009	kenya	Public Road Project	N/A	Complaint successfully handled by Tanzania Field Office (TZFO). In line with the old IRM Rules of 2006, Paragraph III.b.e, the request should include: "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".
17	2009	Kenya	Public Road Project	N/A	Complaint successfully handled by Kenya Field Office (KEFO) In line with the old IRM Rules of 2006, Paragraph III.b.e, the request should include: "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".





AFRICAN DEVELOPMENT BANK GROUP