2021
ACCOUNTABILITY
REPORT

Independent Accessible Fair



IRM INDEPENDENT RECOURSE MECHANISM
AFRICAN DEVELOPMENT BANK

The IRM has rebranded!

After 15 years and a string of different names, we are now known as the Independent Recourse Mechanism (IRM), and this is our new logo:

IRM INDEPENDENT RECOURSE MECHANISM
AFRICAN DEVELOPMENT BANK

Our new logo aims to reflect the environmental, social and governance focus of IRM's work as well as to highlight important attributes of our undertakings: cooperation, inspection, stakeholder-centredness, and our connection with Africa and the AfDB. Several logos were tested in focus group discussions and in stakeholder surveys. The response from stakeholders to this design as an expression of the new IRM was overwhelmingly positive.
We hope that you agree!

OPTIMISM / COOPERATION

INSPECTION / PROCESS

STAKEHOLDER DRIVEN

ENVIRONMENTAL

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About This Report



The IRM's 2021 Accountability Report provides an accounting of our activities and our progress against our annual workplan and towards fulfilling our Vision and Mission. Our Report is directed to our Boards of Directors and our colleagues at the African Development Bank Group (AfDB), as well as to our other stakeholders – collaborators, partners and, most important, the people who are affected by AfDB-funded projects and who seek recourse through our complaints process.

In this report, we are implementing relevant recommendations of our most recent Policy Review, which was released in July 2021. Our aim has been to provide a clear and transparent account of our processes and outcomes.

This report is just one of the communications tools we are deploying to better enable project-affected people and the organizations that advocate for them to understand and access our services to advance our shared interest in sustainable development in Africa.

We are in early stages, and your input will help us prioritize our next steps in communicating with you. Please send your feedback on this report to irm_communication@afdb.org. We are committed to reporting back to you on what we hear and how we implement your suggestions in our 2022 Accountability Report.



Message from the CODE[1] Chair

This year has seen the African Development Bank Group (AfDB) renew its commitment to project-affected people and further strengthen its accountability through key reforms of the Independent Recourse Mechanism (IRM) – the complaints mechanism for AfDB-funded projects.

Despite the challenges posed by COVID-19 to the Bank Group's operations, the IRM was able to achieve results that showcased its relevance and effectiveness and further contributed to advancing the Bank's sustainability goal. These accomplishments include the deployment of a new policy framework that has restructured the IRM to make the Mechanism more accessible, efficient and predictable; they also include the development of a vision and a mission, and of core values that will henceforth guide the IRM's day-to-day operations and engagements with its stakeholders.

The IRM also provided valuable advice to Bank Management through its complaint-handling function and released an important paper on lessons learned regarding cultural heritage and spiritual issues. Moreover, the Mechanism made important inroads on strengthening its engagement with its stakeholders, particularly civil society organizations, and Bank borrowers and clients through various outreach events across Africa.

These commendable achievements would not have been possible without the commitment, dedication and professionalism of IRM staff and their ongoing collaboration with stakeholders. I also want to thank AfDB management for their continued support of the IRM and its work, as well as my fellow CODE members over this period for the important role they perform in reviewing the work of the IRM and its recommendations.

Sincerely,



Mbuyamu Matungulu
AfDB Executive Director and Chair of CODE

1 Committee on Operations and Developement Effectiveness (CODE).



Message from the IRM Director

This year has been one of challenge and renewal. The challenge of course has been in dealing with the ongoing pandemic and the many obstacles it has placed in our way – especially in terms of carrying out site visits and participating in face-to-face meetings, particularly those with our complainant stakeholders. Nonetheless, we successfully moved much of our work online while continuing to ensure affected communities were aware of the IRM and had access to it.

2021 required us to pivot once more as we sought to successfully implement the renewed IRM Policy Framework. In July 2021, after a long process involving evaluation, consultation, and drafting and re-drafting, the IRM's new Rules of Procedure were approved by the AfDB Boards of Directors. The new policy gives rise to some significant changes in our work, many of which are highlighted in this report. The new policy also resulted in a new name for us – the Independent Recourse Mechanism[2].

At the same time, we made excellent progress on our 2021 workplan, achieving most of our goals. At the end of December 2021, the IRM had received nine new complaints, with four eligible for registration. This meant, in 2021, the IRM had handled a record 12 active cases (seven through compliance review and five through problem solving). We also made progress on developing an Advisory Note for the Bank regarding Sexual Exploitation, Abuse and Harassment (SEAH) in projects, which we expect will make an important contribution to the Bank's handling of this issue when it is published in 2022.

Finally, in 2021, together with our stakeholders, we affirmed our mission and vision, and, for the first time, set out our core values, which will help guide us going forward. This exercise to renew and clarify our purpose and values has strengthened our team's coherence and our commitment to enhancing accountability for sustainable development.

Indeed, there has been a lot of change at the IRM this year, and I want to thank staff for their hard work, dedication and adaptability. I also want to thank the Boards and CODE for their continued support and constructive feedback. My thanks too to our many stakeholders who place their trust in us to help address issues in a fair and effective manner as we work towards our shared goal of inclusive development in Africa.

Sincerely,



David Simpson
IRM Director

[2] This replaces the previous Compliance Review and Mediation Unit (CRMU) and the Independent Review Mechanism (IRM).

About the Independent Recourse Mechanism (IRM)



The Independent Recourse Mechanism (IRM) is the independent accountability instrument of the African Development Bank Group (AfDB). The African Development Bank Group is a multilateral development institution that provides financing to African governments and private companies investing in its 54 regional member countries to spur social and economic development and alleviate poverty.

The overarching goal of the IRM is to enhance the accountability and sustainability of projects financed by the AfDB, thereby contributing to social and economic progress in our member countries in Africa.

In practice, this means we provide fair, independent and effective recourse, or help, to individuals, workers and communities – referred to as project-affected people (PAP) or complainants – who believe they are negatively impacted by an AfDB-financed project.

We employ a formal complaints-handling process with the aim to address, resolve and, where appropriate, compensate for harm caused. The complaints-handling process offers two options, or paths, that the process may follow: ① **compliance review**, which investigates claims of policy non-compliance and the occurrence of harm related to an AfDB-funded project, and ② **problem solving**, which aims to resolve complaints through mediated dialogue between complainants and relevant project stakeholders. The path taken for each complaint is decided through consultation between the IRM and the complainant.

In addition to this primary function, the IRM plays an advisory role to the AfDB. Leveraging the work we do to facilitate the resolution of complaints, we identify and advise on potential areas where the AfDB can further strengthen its policies, procedures and/or practices. Through this process of continuous improvement, our goal is to eliminate the causes of complaints, reduce potential harms caused by projects and help to ensure an inclusive approach to sustainable development.

Vision

To provide a safe and trusted space for affected people to bring forward their concerns about Bank-financed projects without fear of retribution, and to create a positive culture within the Bank that values the complaints of stakeholders and seeks to learn from them in order to improve projects, raise standards, minimize disputes and enhance sustainable development outcomes for all.

Mission

To provide fair, independent and effective recourse and remedy for individuals, workers and communities who are adversely impacted by AfDB-funded projects, and to identify potential areas via the complaint-handling process where the Bank can further strengthen its policies, procedures and/or practices in support of sustainable development, ensuring that "no one is left behind."

Core Values

In 2021, the IRM undertook, for the first time, a values exploration exercise to think critically about our objectives and to identify our core values. Our core values help us to advance our vision and mission, and to navigate challenges. We are committed to living and breathing these values in our work every day.

Independence and Impartiality:

We will be independent, evidence-based and impartial in all of our engagements, attributes that help us to earn and maintain the trust of our stakeholders.

Equality:

We seek to be fair and just in all our engagements with stakeholders – respecting human rights and treating all parties to a complaint equitably and with the utmost dignity and respect.

Accessibility:

We strive to ensure that our services are open and accessible to all potential users, removing potential barriers so we are inclusive to all – especially those most vulnerable in our society.

Transparency:

We aim to be clear and transparent in our communications with users of our services and publicly share information about our processes, the progress of our cases, our own performance (both the good and the bad), and the recommendations we make, while always respecting the need for personal privacy and confidentiality.

Diligence and Professionalism:

We commit to providing timely, high-quality work based on robust professional standards, effective dialogue with our stakeholders and well-defined (predictable) processes that focus on continuous improvement and making a difference.

2021 in Numbers

114 complaints received since inception in 2006, from which the IRM has registered

22

13 - problem-solving complaints

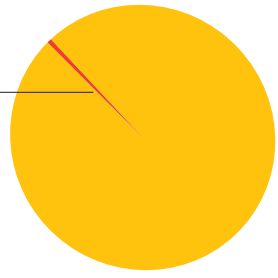
9 - compliance review complaints

33

Recommendations stemming from the IRM's Third Policy Review, 60% of which were completed or in progress by the end of 2021

0.76

Complaints registered by IRM for every 100 projects approved by the Boards



13

African-based languages spoken by the IRM Team

0

IRM's newly adopted zero-tolerance standard for retaliation against complainants

405

Average number of days[3] to complete a compliance review complaint

560

Average number of days[4] to complete a problem-solving complaint

50

Number of trees planted as a result of IRM staff's Mt. Kilimanjaro walking challenge – the equivalent of offsetting approximately 1,100 kilograms of carbon per year



[3] Business days from eligibility assessment until final compliance review report.

[4] Business days from eligibility assessment until the problem-solving exercise concluded.

Governance

Governance describes the structure and codes by which organizations, such as the IRM, operate. Good governance is built on a culture of ethics, integrity, transparency and compliance.

At its most basic, governance describes:

- → How decisions are made
- → Who is accountable
- → Who has a voice in making the decisions

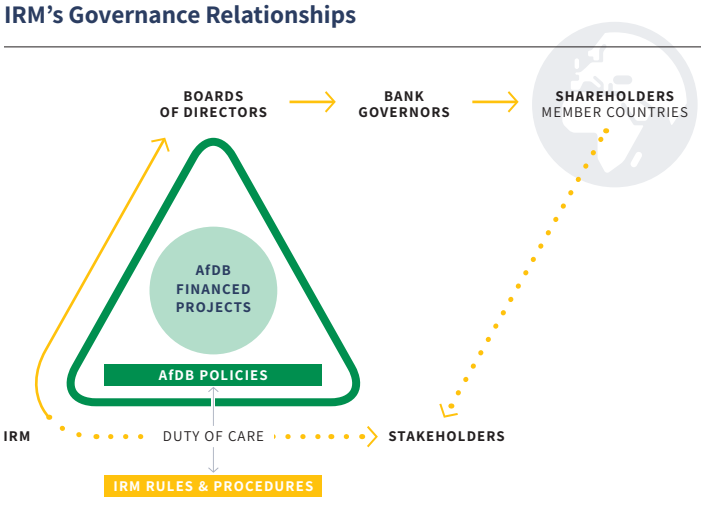
How Decisions Are Made
The IRM is housed within the AfDB; however, we facilitate and make decisions related to the complaints we receive independently of the Bank's operational function. This arms-length independence is critical to building trust among our stakeholders and in the remedies we facilitate for complainants.

Who Is Accountable
The IRM is directly accountable to the AfDB Boards of Directors, which reflect the interests of the Board of Governors. The Board of Governors represents AfDB member country governments and is the highest decision-making organ of the Bank. The IRM Director is selected through a multi-stakeholder process that includes representatives of AfDB management and its Boards of Directors as well as civil society organizations (CSOs). The IRM Director reports to the AfDB Boards of Directors through the Boards' Committee on Operational and Development Effectiveness (CODE).

The CODE sets the Rules and Procedures by which the IRM operates, endorses our annual work program and budget before it is sent for approval by the Boards, and oversees our performance against our objectives.

Who Has a Voice
The IRM is also responsible to our many other stakeholders – such as project-affected communities, CSOs, borrowers and clients, Bank Management and others. We have a duty of care to our stakeholders; their trust affords us our "license to operate" without which we cannot carry out our mandate. We are committed to maintaining their confidence through our ongoing engagement activities with them and through our open and transparent disclosures of performance, on our website and in reports such as this one.

IRM's Governance Relationships



SPOTLIGHT

Increasing Accessibility, Efficiency and Predictability through the Policy Review

The IRM policy framework, which includes our Rules and Procedures, is regularly reviewed to ensure that our work remains relevant and effective. The most recent policy review began in late 2019, and the IRM Boards of Directors approved a new policy framework in July 2021.

The policy framework recommended a new name, the Independent Recourse Mechanism, and sets out the way we work and how we engage with our stakeholders. Its 33 recommendations, which were developed through an 18-month public consultation process, significantly restructure how we handle complaints in an effort to make the process more accessible, efficient, predictable and transparent. Details on the new Policy are available here.

Highlights of the new IRM Policy

As part of the new IRM Policy, our stakeholders will see that:

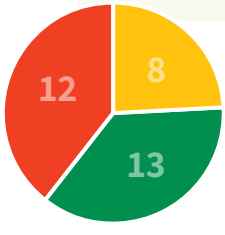
- → The IRM has a new name and will now be known as the Independent Recourse Mechanism.
- → The new mechanism has been restructured, replacing the previous external expert panel model with a fully integrated unit that will now lead all compliance review and problem-solving functions.
- → The new policy strengthens accessibility for complainants by allowing complaints to be filed by a single person and enabling the mechanism to advise communities on how to submit complaints if needed.
- → It adopts a zero-tolerance standard for retaliation against complainants and rejects any form of threat, intimidation, harassment, violence or discrimination towards those that raise concerns through the Independent Recourse Mechanism.
- → It increases complainants' participation in the complaint-handling process by allowing them the opportunity to comment on draft compliance review reports before they go to the Boards.
- → It commits the IRM to pursue a culturally appropriate and gender sensitive complaint process.
- → It allows the IRM to consider a complaint's eligibility even when a case is also part of a legal proceeding, a reversal of a previous restriction.

The new Policy also:

- → Provides the IRM with the ability to initiate compliance review processes in certain circumstances without a formal complaint from affected communities.
- → Empowers the IRM to make recommendations to the Bank on appropriate redress and remedy when individuals or communities are adversely impacted as a result of Bank-financed projects, and to ensure that agreements reached by parties in problem-solving activities are aligned to international norms.
- → Requires Bank Management to make the IRM better known among affected communities by disclosing information about the IRM at a project level.

The new framework became effective immediately following its approval. Of its 33 recommendations, 24% have already been completed and 36% were underway by the end of 2021. Our goal is to complete implementation of all recommendations by the end of 2022.

RECOMMENDATIONS	COMPLETED	IN PROGRESS	PLANNED
33	8	12	13
	24%	36%	39%



> The UN Human Rights Office warmly welcomes the AfDB–IRM's revised Operating Rules and Procedures, setting high standards for trust, accessibility, independence, transparency, protection against reprisals, linkage with international human rights standards and, critically, explicitly aiming to provide remedy to project-affected people. These procedural advances set an important precedent and ambitious marker for AfDB's safeguards policy review in 2022 and, if fully applied, will go a long way in protecting human rights in the Bank's operations.



— **MacALLISTER DARROW**
UN REPRESENTATIVE,
OFFICE OF THE
HIGH COMMISSIONER
FOR HUMAN RIGHTS

"If you don't know where you are going,
you are certain to end up somewhere else." - YOGI BERRA

IRM Strategy

In August 2021, the IRM undertook a multi-day strategic planning exercise to better define our direction of travel and establish realistic objectives and goals that are in line with our mission and vision. All IRM team members participated as well as representative stakeholders, including members of our Boards of Directors, AfDB staff, and international and local CSOs.

Through an iterative process, we developed our 2021–2025 strategic plan, which flows from the IRM's objectives.



IRM 2021-2025 Strategic Plan

OBJECTIVES	STRATEGY
To provide complainants with a recourse mechanism that is recognized as being informative, predictable and fair and is trusted by all of our diverse stakeholders.	→ Provide timely and effective assessments, investigations and follow-ups of complaints. → Make practical recommendations to redress harm and rectify non-compliance. → Improve stakeholders' understanding of the IRM's functions and complaint-handling processes. → Clearly communicate to all stakeholders on the outcomes of our complaint-handling processes.
To use knowledge and insight obtained from complaints to influence internal reforms at the Bank, address systemic issues and improve the manner in which the Bank identifies, prepares, appraises, implements, monitors and exits projects.	→ Identify systemic weaknesses in the Bank's processes and practices that impede compliance. → Work with Bank Management to address stakeholder complaints to achieve better outcomes. → Provide relevant recommendations and advice to help improve the Bank's practices. → Analyze data gathered on complaints to identify trends and potential areas of concern.

CONTINUED ↓

OBJECTIVES	STRATEGY
To ensure that impacted individuals and communities are aware of and have access to the IRM and its services, and have the necessary information, support, and advice to initiate, track and manage their complaints.	→ Build awareness in impacted communities about the Bank's policies/safeguards and about the IRM. → Support individuals in submitting complaints by providing them with access to necessary resources. → Improve the Bank staff's knowledge about their obligations in making stakeholders aware of the IRM. → Monitor the effective application of the Bank's Disclosure and Access to Information Policy. → Ensure that the complaint process is culturally appropriate, gender responsive and equally accessible to all. → Forge relationships with relevant groups (NGOs, business groups, bar associations, trade unions, etc.).
To continue to evolve and improve the IRM and its effectiveness by implementing the recommendations of the Third IRM Policy Review.	→ Implement and respond to the recommendations of the Third IRM Policy Review with the assistance of the Inter-Departmental Working Group.
To help the Bank build capacity among its borrowers and clients and to provide general resources and training on how to develop and manage effective operational-level grievance mechanisms to better respond to stakeholder concerns and issues of sustainability.	→ Develop public training and resource material for the Bank's borrowers and clients on how to better develop and manage operational grievance mechanisms. → Serve as an information resource on building and maintaining effective grievance mechanisms. → Establish the link between effective operational grievance mechanisms and increased success/ sustainability in projects.
To be a model of an accountable and sustainable office whose performance is open to stakeholder scrutiny and whose systems, structure and culture enable capable, professional and engaged IRM staff to work together to achieve its objectives.	→ Attract, develop and retain a capable and engaged workforce. → Develop a positive and productive culture that supports innovation and "failing forward." → Improve IRM systems and processes focusing on stakeholder needs and consistency of service. → Strengthen our governance frameworks to ensure accountability and performance. → Seek feedback to improve our performance, paying attention to the users' perspectives.

We aim to develop key performance indicators (KPIs) with our stakeholders to ensure that we remain aligned with our strategies and make progress towards our objectives. We will review our strategies annually to confirm their continued relevance.



Engaging Stakeholders

Engaging effectively with stakeholders is fundamental to organizational success in the 21st century as the issues affecting individuals, communities, countries and the planet become increasingly complex and interconnected.

Our Key Stakeholders

- → Bank Management
- → Borrowers/Clients
- → Civil society organizations
- → Complainants
- → IRM staff

Understanding Stakeholder Perceptions

In August 2021, we surveyed a cross-section of stakeholders to understand their perceptions of and satisfaction with the IRM. In total, we had 42 respondents to our survey, which makes it difficult to claim any strong statistical validity. Nonetheless, the feedback may provide readers with some indicative analysis.

- → 91% of respondents agreed or strongly agreed that: “IRM staff conduct themselves in a professional manner, demonstrating the appropriate skill level, good judgment and polite and respectful behaviour required of someone in this role.”
- → 77% of respondents agreed or strongly agreed that: “the IRM handles complaints in a fair and impartial manner.”
- → Reflecting on the 2015 Rules that were in place at the time of the survey, 66% agreed or strongly agreed with the statement that: “the IRM provides clear and well-understood procedures with indicative timelines for each stage.”
- → Only 50% of respondents agreed or strongly agreed that: “the IRM is known to all stakeholders for whom it is intended and provides adequate assistance for those who may face particular barriers to access.”

We are determined to increase our stakeholder satisfaction scores across all questions and will continue to focus on ensuring that our complaints-handling process is known, understood and time-sensitive.

At IRM, we believe successful engagement with our stakeholders:



- → Increases awareness of and access to the resources and support we provide to people affected by or involved in AfDB-financed projects,
- → Enhances confidence and trust in our complaints-handling processes and their outcomes, and
- → Provides a platform for collaborative knowledge sharing and institutional learning.

To learn more about the issues we engaged with stakeholders in 2021, see our summary table below.

2021 Stakeholder Issues and How We Engaged

STAKEHOLDER ISSUE	STAKEHOLDERS	KEY ENGAGEMENT ACTIVITIES
Complaint Handling	Complainants CSOs Project Implementation Units (PIUs)	→ Communicated closely with complainants and CSOs on issues of relevance throughout the complaint-handling process. → Engaged closely with PIUs, especially in problem-solving exercises.
	Bank Management	→ Offered Bank Management opportunities to exchange views and to clarify findings and recommendations before Compliance Review Reports are finalized.
	All Stakeholders	→ Shared progress and results of cases on our website.
Covid Protocols	Independent Accountability Mechanisms (IAMs)	→ Shared lessons and strategies with peers on how best to navigate the challenges of conducting our work during a pandemic.
	Suppliers	→ Held information sessions with experts to learn more about remote investigation using drones and satellite maps.
	Bank Management	→ Consulted with Bank Management and medical professionals on developing protocols to keep communities safe during missions.

STAKEHOLDER ISSUE	STAKEHOLDERS	KEY ENGAGEMENT ACTIVITIES
Employee Engagement	IRM Staff	→ Conducted first-ever staff satisfaction survey.
IRM Policy Review	Board Members	→ Held virtual sessions with the various Board constituencies to discuss the draft IRM Policy Review and receive their feedback.
	Bank Management	→ Conducted various sessions with Bank Management including a session with Senior Management to receive their feedback on the draft IRM Policy Review.
	CSOs	→ Conducted 3 sessions with CSOs in 2021 to receive their feedback on the various drafts of the IRM Policy Review.
IRM Strategic Plan	Bank Management Board Members CSOs IRM Staff	→ Engaged actively with key representatives of our stakeholders who participated in our 2021 online strategic planning process. → Conducted a stakeholder survey which helped to inform our overall strategy and plans.
Sexual Exploitation, Abuse and Harassment (SEAH)/ Gender	Bank Management	→ Established a stakeholder group from key Bank departments to collect feedback for the development of an Advisory Note concerning SEAH risks in Bank operations.
	CSOs Academics IAMs	→ Facilitated a learning session with GenderAction and Oxfam to discuss their paper, "Unmet Gender Promises: Making IFI policies and projects deliver on gender equal rights." → Collaborated with international development collective, BOND, on developing a bespoke course on SEAH in collaboration with other IAMs to engage and learn from our peers.

Understanding What Matters Most

In early 2022, we undertook a study to understand the topics that are most important to the IRM and to our stakeholders. We reviewed global sustainable development frameworks, such as the UN Sustainable Development Goals, identified best practices in the reports of our peers and took into consideration the recommendations of our 2021 Policy Review as well as the requirements and guidance that inform our objectives and strategic plan.

Based on this analysis, we created a list of nine core topics that we prioritized for inclusion and 10 additional topics for consideration. We then engaged select IRM stakeholders, including Bank Management and staff, borrowers, CSOs and other Independent Accountability Mechanisms (IAMs).

Their input provided us with a stakeholder lens to validate the importance and inclusiveness of the nine core topics we had prioritized.

In addition, our engagement with stakeholders helped us prioritize the 10 additional topics as high, medium and low importance.

Core Topics

- → Enable Trust
- → Create Awareness
- → Enhance Accessibility
- → Provide a Clear and Timely Complaint Process
- → Treat all Parties Equitably
- → Ensure Transparent Processes
- → Demonstrate Respect of Human Rights in Complaints Process
- → Effectively Deliver Remedy to Complainants
- → Continuously Improve

Importance Level

High, Medium, Low Importance

High

Anti-retaliation and Reprisal Policies (Confidentiality)

Stakeholder Engagement and Responsiveness

Medium

Quality and Relevance of Communications/Information

Governance and Ethical Conduct

Public Influence and Thought Leadership

Health and Safety (including COVID-19)

Environmental Sustainability

Low

Community Involvement (Contribution to SDGs)

Diverse and Motivated Team

Economic Efficiency and Contributions to Economic Value

We are integrating this analysis into our 2022 activities, with the aim to continue to deepen and fine tune our understanding of our stakeholders' priorities to inform our responses to them and our annual disclosures. For topic definitions, please see Appendix 5.

Our 2021 Performance





The IRM, in its capacity as the independent accountability mechanism of the AfDB, handles complaints from people who are (or who are likely to be) adversely affected by Bank-financed projects.

The IRM's formal complaints-handling process aims to address, resolve and, where appropriate, compensate for harm linked to the Bank's non-compliance with social and environment policies and procedures.

The complaints-handling process offers two primary options, or paths, that it may follow: 1) compliance review, which investigates claims of policy non-compliance and/or the occurrence of harm related to an AfDB-funded project, and 2) problem solving, which aims to resolve complaints through mediated dialogue between complainants and relevant project stakeholders. The path taken for each complaint is decided through consultation between the IRM and the complainant.

The IRM received nine new complaints in 2021, with four eligible for registration. This meant that, in total, we handled 12 active cases in 2021 (comprised of newly registered and legacy complaints still in process), a record high for the IRM. Seven were handled through compliance review and five through problem solving. We provide summaries of each case in this next section.

We also provide details of the spot-checks of Bank-funded projects we undertook in 2021, as well as our advisory and outreach initiatives.

Complaints Handling

The complaints-handling process of the IRM is activated when we receive a complaint from individuals, communities or workers who consider themselves negatively affected by an AfDB-funded project. Once a complaint is received and registered, the IRM has two possible processes for handling it: compliance review and problem solving.



SNAPSHOT

2021 Complaints Handling

In 2021, the IRM processed nine new complaints and carried a caseload of 12 active complaints.

9 new complaints received

- → **3** registered with compliance review
- → **1** registered with problem solving
- → **5** not registered (outside of the IRM mandate)

8 legacy complaints/cases

Compliance Review

The compliance review process investigates the validity of the complainants' assertion that the Bank has not complied or is not complying with AfDB policies and procedures. If the IRM finds that the Bank is not in compliance with its own policies and procedures and this non-compliance can be linked to a harm or a potential harm, then we will recommend ways for the Bank to address the non-compliance and to repair the harm.

Problem Solving

The problem-solving process aims to reach an agreement between the complainants and the organization in charge of the project's execution that addresses the issues raised in the complaint through participation in a facilitated or mediated process. In the problem-solving process, the IRM acts as an impartial third party providing support and guidance.

The choice of process depends on 1) the complainants' preferences and 2) the IRM's assessment of the best way to address the concerns and provide the most effective recourse.

The compliance review and problem-solving processes are participatory, relying on continuous engagement with complainants to understand their preferences, analyzing potential harms, and assessing and offering the best option for their needs. We are committed to providing equitable, impartial and effective redress processes.

Complaint-Handling Timelines

The IRM is not always in control of the timing surrounding complaint-handling processes, but we remain committed to responding to complaints in a timely manner. In 2021, we conducted an analysis of the IRM's complaint-handling timelines since its inception in 2006. Through this analysis, we determined that a compliance review investigation takes an average of 405 business days to complete, and a problem-solving exercise takes an average of 560 business days from the time the exercise is initiated until a final report is issued to the Boards. We are committed to reducing the time we take to manage complaints; we are currently beta testing a tool we developed in 2021 to better track our complaint-handling times.

SPOTLIGHT

Addressing Retaliation

The IRM is committed to providing complainants and human rights defenders a safe space to which they can bring their concerns about AfDB-financed projects freely and without fear of intimidation or harassment.

We have recently observed an increase in the number of complaints requesting confidentiality due to fear of retaliation, and Complainants themselves are claiming that violence and other forms of attacks are being used against individuals and communities that voice concerns about projects.

We are acting on these concerns. In 2021, we established a new set of guidance and procedures on anti-retaliation, which re-affirm our zero tolerance for reprisals against complainants. Our new policy states:

> The IRM does not tolerate retaliations against complainants or any other individuals involved in the complaints process and rejects any form of threat, intimidation, harassment, violence or discrimination based on the fact that they have exercised their right to raise concerns.

We are working with our stakeholders to refine anti-reprisals tools and procedures that will help us address the risks of reprisals against individuals or groups of people that want to file a complaint before the IRM.

New Chief Compliance Officer

In 2021, we recruited Arantxa Villanueva as our new Chief Advisory and Compliance Officer. A former Acting Director and Chair of the Compliance Review Panel of Experts with MICI (the Independent Consultation and Investigation Mechanism) at the Inter-American Development Bank (IDB), Arantxa Villanueva brings a wealth of knowledge on environmental and social safeguards, human rights, and investigative skills to the IRM.

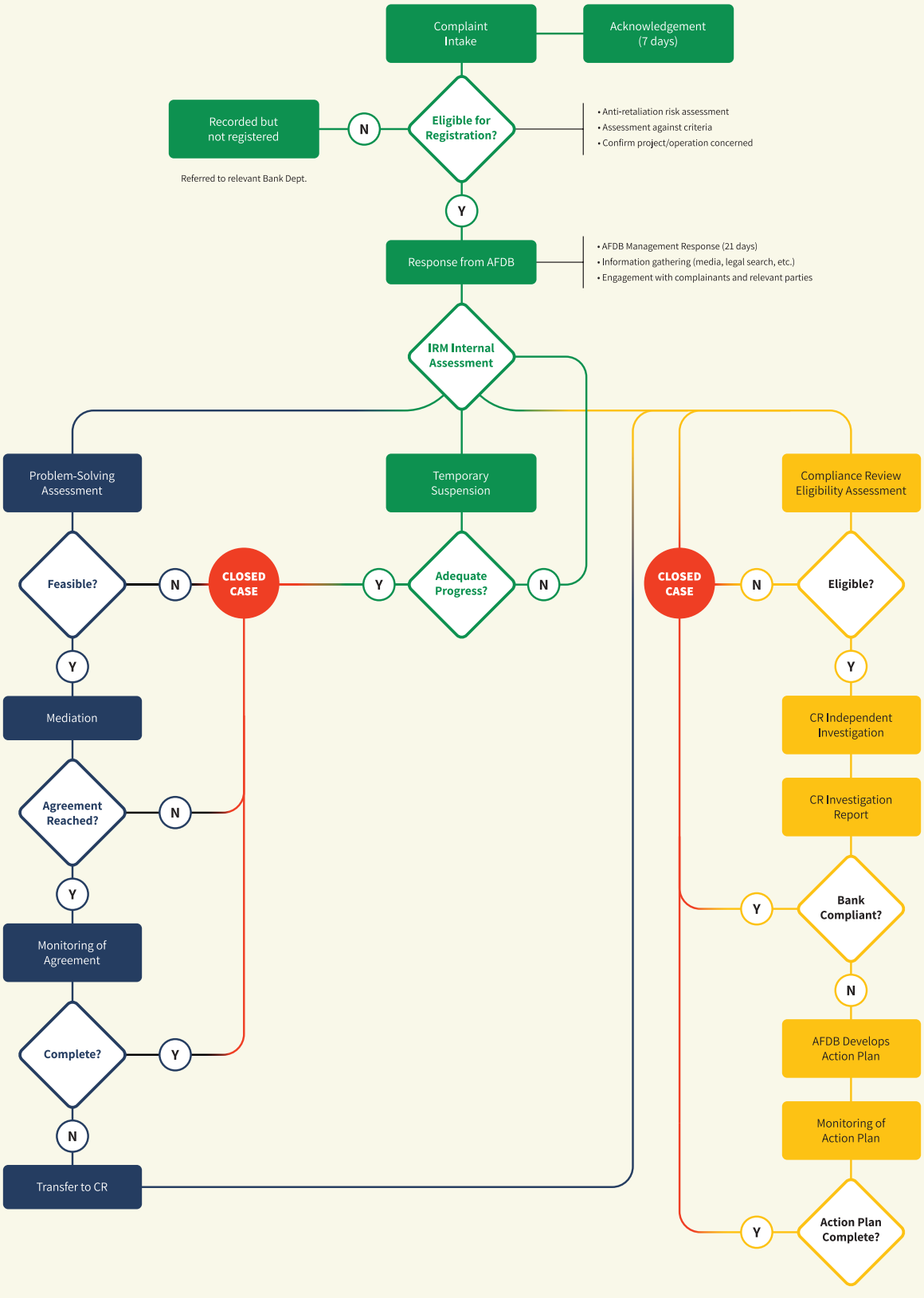


The Business and Human Rights Resources Centre's database of attacks against Human Rights Defenders recorded more than 3,671 attacks globally between 2015 and the end of 2021.

Complaints-Handling Policy Transition

In July 2021, the IRM shifted to a new complaints-handling policy in accordance with the Third Policy Review approved by the Boards. The new policy is being applied to new cases as well as to the new stages of legacy cases and has resulted in an updated case handling process. The IRM team adapted the internal processes throughout the transition and no processing delays were experienced.

IRM Case-Handling Process



Compliance Review Process

The IRM's compliance review process is designed to examine whether the AfDB has complied with its policies and procedures related to a relevant project or operation. In cases where non-compliance is established, the compliance review process determines whether it has caused harm to the complainants and/or to the environment.

In 2021, the IRM registered three new complaints for compliance review (one from Kenya and two from Uganda) and monitored the implementation of four Action Plans for ongoing complaints (from South Africa, Mali, Senegal and Guinea). Details on these cases are included in the following pages.

What Happens When You Submit a Complaint

- → The IRM receives your complaint, makes sure it meets our complaints criteria and, if it does, officially registers your complaint.
- → Once your complaint is registered, Bank Management is offered an opportunity to respond to the content of the complaint.
- → After the IRM receives the response from Bank Management and has carried out its own due diligence, it will engage in an eligibility assessment process which may involve a preliminary assessment and site visit to evaluate if there is prima facie evidence of harm and, if so, if it can plausibly be linked to the Bank's non-compliance with its policies.
- → If it meets the eligibility threshold, we will investigate your complaint to see if the AfDB, in fact, did not comply with the relevant policies and procedures. We also check to see if any harm has occurred or is likely to occur as a result.
- → Once we complete our investigation, we prepare a draft report that states our findings and our recommendations for next steps; we deliver this to AfDB Bank Management and the Complainants for comments.
- → Bank Management then reviews our final recommendations and develops an Action Plan to fix any shortcomings we identified to try to ensure that what caused your complaint will not happen again.
- → The Boards of Directors review and approve our Report and the Bank Management's Action Plan.
- → We monitor the Action Plan implementation until it is completed.
- → Following the successful implementation of the Action Plan, a final monitoring report concludes the compliance review process.





PROJECT:

Multinational Lakes Edward and Albert Integrated Fisheries and Water Resources Management (Leaf II) Project

LOCATION:
Uganda

COMPLAINT:
Alleged violations of AfDB's environmental and social policies

COMPLAINANTS:
Human rights NGO in Uganda representing indigenous fisherfolk

STATUS:
Ongoing

PHASE:
Compliance review

REFERENCE NUMBER:
RQ 2021/4



Complaint

On November 17, 2021, the IRM received a Complaint from a human rights NGO in Uganda representing indigenous fisherfolk who alleged that they are negatively impacted by the Project. The Complaint is related to inadequate consultations, forceful relocation, loss of livelihoods and incidences of violence and reprisals.

NOV. 2021: IRM received the Complaint

DEC. 2021: IRM registered the Complaint, and the IRM asked Management to provide a Management Response by January 2022

Project

The LEAF II Project aims to create an enabling environment for development and to strengthen the legal, policy, institutional and regulatory framework for the sustainable management of natural resources and protection of the environment in the lakes Edward and Albert. The project is also designed to strengthen the capacity of government institutions to promote environmentally friendly interventions for the use of the Lakes' resources and to promote regional trade and exchanges. It is meant to contribute to the creation of alternative income opportunities as well as food security for the fishing communities.

PROJECT APPROVED:
May 2015

PLANNED COMPLETION:
June 2022

CO-FINANCERS:
Global Environment Facility grant; a counterpart, or matching, contribution from the Nile Equatorial Lakes Subsidiary Action Program

Actions/Results

In 2021, the IRM received and registered the Complaint and requested that Bank Management submit their Response to the Complaint by January 2022.

Next Steps

Upon receipt of the Management Response to the Complaint, the IRM will conduct an eligibility assessment of the Complaint, which will include a field mission. The subsequent Compliance Eligibility Assessment Report expected in the Spring of 2022 will provide a recommendation regarding whether the Complaint meets the criteria for a compliance review to proceed.





PROJECT:

Wadelai Irrigation Scheme Project under the Farm Income Enhancement and Forestry Conservation Project – Phase 2 (FIEFOC-2)

LOCATION:
Uganda

COMPLAINT:
Alleged violations of AfDB's environmental and social policies

COMPLAINANTS:
Representatives of Paten community

STATUS:
Ongoing

PHASE:
Compliance review

REFERENCE NUMBER:
RQ 2021/3



Complaint

On October 11, 2021, the IRM received a Complaint from representatives of the Paten community who alleged that they are negatively affected by the Project. Because they fear reprisals, the Complainants requested that the IRM keep their identities confidential throughout the process. The Complaint alleges inadequate consultations, forceful acquisition of clan land for the Project, retaliations against community members, and negative impacts on livelihoods.

OCT. 2021: IRM received the Complaint

NOV. 2021: IRM registered the Complaint

DEC. 2021: IRM received a Management Response to the Complaint

DEC. 2021: IRM Director designated the Complaint for a compliance eligibility assessment

Project

The Wadelai Irrigation Scheme Project under the Farm Income Enhancement and Forestry Conservation Project – Phase 2 (FIEFOC-2) aims to contribute to the improvement of farm incomes, rural livelihoods and food security as well as climate resilience, sustainable natural resources management and agricultural enterprise development. The Wadelai Irrigation Scheme is one of five irrigation schemes being built in selected districts as part of FIEFOC.

PROJECT APPROVED:
January 2016

PLANNED COMPLETION:
June 2023

CO-FINANCERS:
Nordic Development Fund; a counterpart, or matching, contribution by the Government of Uganda

Actions/Results

In 2021, the IRM received and registered the Complaint. Upon receipt and review of the Management Response, the IRM Director designated the Complaint for the compliance review process. The IRM began the compliance eligibility assessment process in December 2021.

Next Steps

The IRM will continue the eligibility assessment of the Complaint in 2022, which will include a field mission. The subsequent Compliance Eligibility Assessment Report will provide a recommendation as to whether the Complaint meets the criteria for it to proceed to a compliance review investigation.





PROJECT:

The Construction Works for the Kapenguria-Makutano and Chepararia Towns Sewerage System Project

LOCATION:
Kenya

COMPLAINT:
Alleged violations of AfDB's environmental and social policies

COMPLAINANTS:
A family directly affected by the Project and other community members

STATUS:
Ongoing

PHASE:
Compliance review

REFERENCE NUMBER:
RQ 2021/2



Complaint

On November 7, 2020, the IRM received a Complaint from the representative of people who alleged that they are directly and indirectly affected by the proposed Project. The Complaint relates to violations of property rights, disregard for environmental and socio-cultural considerations, and inadequate consultations.

NOV. 2020: IRM received the Complaint

FEB. 2021: IRM registered the Complaint

MAR. 2021: IRM received a Management Response to the Complaint

OCT. 2021: Eligibility assessment recommended a Compliance Review

NOV. 2021: IRM started the Compliance Review

DEC. 2021: IRM undertook a compliance review field mission

Project

The proposed Kapenguria-Makutano and Chepararia Towns Sewerage System Project consists of the construction of a sewage treatment plant, a conveyance system for wastewater from the towns and residential areas to the treatment sites, administration and laboratory buildings, and ancillary works. The aim of the project is to improve sanitation conditions by providing sustainable wastewater management services for the two towns.

PROJECT APPROVED:
November 2016

PLANNED COMPLETION:
December 2023

CO-FINANCERS:
None; a counterpart, or matching, contribution by the Government of Kenya

Actions/Results

In 2021, the IRM registered the Complaint and conducted an eligibility assessment. The Complaint met the necessary criteria and was recommended for a compliance review. The Boards of Directors, as per the requirements of the previous IRM Rules, authorized the compliance review to proceed, after which the IRM conducted a compliance review mission to Kapenguria and held virtual interviews with relevant stakeholders.

Next Steps

The IRM will prepare a draft Compliance Review Report and share it with Bank Management and the Complainants for comments. The IRM will then consider and analyze the received comments and prepare a final Compliance Review Report with findings and recommendations for consideration by the Boards of Directors.





PROJECT:

Medupi Power Project

LOCATION:
South Africa

COMPLAINT:
Alleged violations of AfDB's environmental and social policies

COMPLAINANTS:
Two individuals

STATUS:
Ongoing

PHASE:
Compliance review (monitoring stage)

REFERENCE NUMBER:
RQ 2010/2



Complaint

On September 28, 2010, the IRM received a Complaint from two individuals who asked that their identities remain confidential. The Complaint relates to inadequate consultations, the desecration of graves, and the burden of hidden costs for public health risks due to emissions which will be borne by the communities living near the Medupi Power Plant.

SEP. 2010: IRM received the Complaint

OCT. 2010: IRM registered the Complaint

NOV. 2010: IRM received a Management Response to the Complaint

JAN. 2011: Eligibility assessment recommended a Compliance Review

JUL. 2011: The Boards authorized a Compliance Review

SEP. 2012: The Boards approved the recommendations from the IRM Compliance Review Report

FEB. 2013: The Boards approved the updated Management Action Plan and authorized the IRM to monitor the status of its implementation annually

Project

The Medupi Power Project consists of the construction of a 4,764-megawatt coal-fired power plant in Lephalale, Limpopo province, South Africa. The project is comprised of six generating units, which are all in commercial operation. The project was designed to increase the country's energy generation capacity to meet growing electricity demand.

PROJECT APPROVED:
November 2009

PLANNED COMPLETION:
June 2021

CO-FINANCERS:
The World Bank

Actions/Results

In 2021, the IRM completed a fifth round of monitoring on the implementation of two outstanding action items in the updated Management Action Plan. These are 1) the reduction of risk to public health due to emissions and 2) the ensured compliance with the Integrated Water Resources Management Policy. The IRM found that both items are still pending and are likely to be accomplished by 2026; therefore, it recommended suspending the monitoring until then.

Next Steps

The IRM will follow up with Bank Management to obtain quarterly reports on the steps taken by the energy company Eskom to address the two pending action items. The reports will be submitted to the Boards.

PROJECT:

The Diversification of the Activities of the Modern Mills Project in Mali (M3)

LOCATION:
Mali

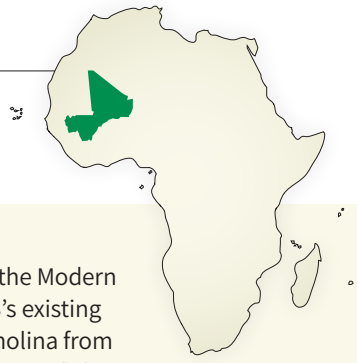
COMPLAINT:
Alleged violations of AfDB's environmental and social policies

COMPLAINANTS:
International NGO with local representation in Mali on behalf of project-affected people

STATUS:
Ongoing

PHASE:
Compliance review (monitoring stage)

REFERENCE NUMBER:
RQ 2016/1



Complaint

On March 23, 2015, the IRM received a Complaint from an international NGO representing the project-affected people (PAP). The Complaint relates to land grabbing in two villages by the M3 Project, violations of human rights, threat to the physical security of the PAP, and inadequate compensation for their land.

MAR. 2015: IRM received the Complaint

MAY 2016: IRM registered the Complaint

AUG. 2016: IRM received a Management Response to the Complaint

NOV. 2016: Eligibility assessment recommended a Compliance Review

APR. 2018: The Boards approved the recommendations from the IRM Compliance Review Report

NOV. 2018: The Boards approved the updated Management Action Plan and authorized the IRM to monitor the status of its implementation annually

Project

The Diversification of the Activities of the Modern Mills Project (M3) aimed to expand M3's existing processing facilities to produce (i) semolina from durum wheat, millet and maize; (ii) long and short pasta, as well as couscous from wheat, millet and maize; and (iii) flour from kibbled millet and maize. M3 would also acquire a new flour mill to produce bread-quality wheat flour.

PROJECT APPROVED:
September 2014

PLANNED COMPLETION:
2019

CO-FINANCERS:
Banque Ouest Africaine de Développement and Banque Atlantique Mali

Actions/Results

In 2021, the IRM conducted its second round of monitoring on the status of the implementation of the November 2018 Management Action Plan. The IRM closed one of the five action items after verifying its completion. Three other action items were retired after assessing both the efforts of Bank Management as well as the willingness of the project sponsor and government officials in Mali to engage. At the same time, the IRM suggested that Bank Management bring in an independent mediator to help resolve the community dispute. One action item remains open and relates to the need for an environmental audit of the industrial facility. The item will remain open until this action is completed.

Next Steps

The IRM will monitor the progress made in the implementation of the remaining action item and will update the Boards of Directors during the third round of monitoring in 2022.

PROJECT:

Construction of a 125 MW Sendou Coal Power Plant in the village of Bargny Minam

LOCATION:
Senegal

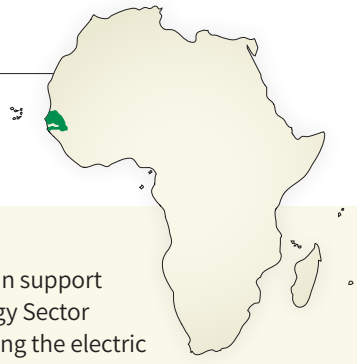
COMPLAINT:
Alleged violations of AfDB's environmental and social policies

COMPLAINANTS:
Local NGO and two individuals representing two groups of project-affected people

STATUS:
Ongoing

PHASE:
Compliance review (monitoring stage)

REFERENCE NUMBER:
RQ 2016/2



Complaint

In May and July 2016, the IRM received Complaints from a local NGO and two individuals respectively. Both groups filed the Complaints as representatives of project-affected people. The Complaints related to the disruption of livelihoods due to the displacement of fish drying businesses on the buffer zone, imminent health risks resulting from air pollution from the power plant, land ownership claims at the Sendou Project location, inadequate public consultations, and adverse impacts on marine life.

MAY 2016: IRM received the 1st Complaint

JUL. 2016: IRM received the 2nd Complaint

AUG. 2016: IRM registered the two Complaints as a single Complaint as both raised similar issues

SEP. 2016: IRM received a Management Response to the Complaint

APR. 2017: Eligibility assessment recommended a Compliance Review

JAN. 2019: The Boards approved the IRM's recommendations in the Compliance Review Report and the Management Action Plan, authorizing the IRM to monitor the status of its implementation annually

Project

The Sendou Power Plant project was in support of the Senegalese government's Energy Sector Development Policy aimed at improving the electric power supply in terms of reliability and cost.

PROJECT APPROVED:
November 2009

PLANNED COMPLETED:
October 2018

CO-FINANCERS:
Banque Ouest Africaine de Développement, Netherlands Development Finance Company and Compagnie Bancaire de l'Afrique de Occidentale

Actions/Results

In 2021, the IRM conducted its second round of monitoring on the status of implementation of the updated Management Action Plan from July 2020. The IRM found that the plan's action items had not been implemented. The Sendou Project had been temporarily closed down in July 2019 due to technical and financial difficulties. In September 2021, the sponsor re-commenced operations at the power plant at a lowered capacity of 75–85 megawatts in order to identify the defects in need of repair. The Project has been undergoing a financial restructuring process to find a long-term sustainable solution.

Next Steps

The IRM will closely follow the restructuring process and continue to monitor the implementation of the updated Management Action Plan. The IRM will provide updates to the Boards of Directors during the third round of monitoring in 2022.

PROJECT:

Multinational Road Development and Transport Facilitation Programme within the Mano River Union (Guinea Section)

LOCATION:
Guinea-Conakry

COMPLAINT:
Alleged violations of AfDB's environmental and social policies

COMPLAINANTS:
Two Guinean nationals working with a local NGO on behalf of project-affected people

STATUS:
Ongoing

PHASE:
Compliance review (monitoring stage)

REFERENCE NUMBER:
RQ 2016/3



Complaint

On September 15, 2016, the IRM received a Complaint from two Guinean nationals working with a local NGO representing the project-affected people (PAP). The Complaint relates to potential damage to the ecosystem services that are a source of livelihood for many people, inadequate assessment of the potential negative impacts and therefore inadequate mitigation measures, no consideration given to the protection status of the Nimba Mountains, and inadequate public consultation.

SEP. 2016: IRM received the Complaint

NOV. 2016: IRM registered the Complaint

JAN. 2017: IRM received a Management Response to the Complaint

JAN. 2018: Eligibility assessment recommended a Compliance Review

APR. 2019: The Boards approved the IRM's recommendations in the Compliance Review Report and the Management Action Plan, authorizing the IRM to monitor the status of its implementation annually

Project

The Guinea Road Project is part of the Mano River Union (MRU) Regional Program, which has an overall objective of supporting economic recovery in the post-conflict region of the MRU by improving its road infrastructure. Specifically, the Program aims to improve transport conditions on the various project roads and thus reduce transport costs, remove obstacles to the free movement of people and goods between the three countries covered by the Program (Guinea, Côte d'Ivoire and Liberia), and improve the living conditions of the population in the areas covered by the Program.

PROJECT APPROVED:
December 2014

PLANNED COMPLETION:
June 2022

CO-FINANCERS:
None

Actions/Results

In 2021, the IRM conducted the first round of monitoring on the status of the implementation of the Management Action Plan and found that there had been some progress in the implementation of five of the six action items; however, there were considerable delays and close follow-up by Bank Management is needed for them to be completed. There was no progress made in the implementation of the sixth action item (compensation payment to the PAP); this was due to the suspension of project disbursements.

Next Steps

The IRM will continue to monitor the implementation progress of the six action items and provide an update to the Boards of Directors following the second round of monitoring in 2022.

Problem-Solving Process

The purpose of problem solving is to restore effective dialogue between complainants and other relevant parties and to engage them in seeking mutually satisfactory outcomes on the issue(s) underlying a complaint. The problem-solving process is a voluntary and collaborative process through which parties that are ready to engage in problem-solving exercises work together to determine the nature of their differences and to look for ways to meet their respective needs, values and concerns. It is one of the main tools used by the IRM in the handling of complaints.

In 2021, the IRM registered one complaint for problem solving (Burundi) and closed four problem-solving exercises (from Senegal, Côte d'Ivoire, Burundi and Kenya). Details on these cases are included in the following pages.

What Happens When You Submit a Complaint

- → The IRM receives your complaint, makes sure it meets our complaints criteria and, if it does, officially registers your complaint.
- → Once your complaint is registered, Bank Management is offered an opportunity to respond to the content of the complaint.
- → After the IRM receives the response from Bank Management and has carried out its own due diligence, it will engage in an eligibility assessment process which may involve a preliminary assessment and site visit to determine if the parties involved are willing to engage in a problem-solving exercise. A problem-solving assessment report is then prepared with recommendations on whether or not the complaint should be handled through problem solving.
- → If the parties are amenable to resolving the issue(s) in a collaborative manner, the IRM invites them to start the problem-solving exercise, which will apply a number of different tools and techniques in consultation with the parties.
- → If the problem-solving exercise is successful, it will typically result in an agreement between the parties on how to jointly solve their issue(s). The IRM may also monitor the implementation of the agreements.
- → At the end of the problem-solving exercise, a summary report, which respects any agreements on confidentiality, is prepared and sent to the parties, as well as to the Boards of Directors and the President for informational purposes.





PROJECT:

The Mombasa–Mariakani Highway Project

LOCATION:

Kenya

COMPLAINT:

Alleged violations of the Bank's Involuntary Resettlement Policy

COMPLAINANTS:

Residents and business owners along the project corridor

STATUS:

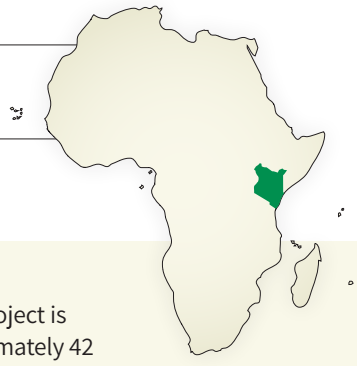
Problem solving: closed;
transferred to compliance review: ongoing

PHASE:

Problem solving

REFERENCE NUMBER:

RQ2018/1



Complaint

In 2017 and 2018, the IRM received Complaints made by representatives of project-affected people who lived along the project corridor. The Complaints relate to people who believe they were erroneously excluded from the list of those entitled to compensation, and to the absence of a proper breakdown of the valuations that were paid in the compensation awards.

DEC. 2017 – AUG. 2018: IRM received three different Complaints

MAR. 2018: IRM undertook a fact-finding mission

DEC. 2021: IRM registered the Complaints

NOV. 2020: Mediation process started

DEC. 2021: IRM preliminary agreement reached

Project

The Mombasa–Mariakani Highway Project is rehabilitating and expanding approximately 42 kilometres of roadway between Mombasa and Mariakani in Eastern Kenya. The project is designed to improve the transportation of import and export goods as well as passenger traffic along the Northern Corridor.

PROJECT APPROVED:
March 2015

PLANNED COMPLETION:
June 2023

CO-FINANCERS:
The German Development Bank, the European Investment Bank, the EU–Africa Infrastructure Trust Fund; and a counterpart, or matching, contribution by the Government of Kenya

Actions/Results

In November 2020, as part of the mediation process, the IRM facilitated a virtual plenary mediation meeting. At this meeting, a tentative agreement was reached between the Complainants and the Kenya National Highways Authority (KeNHA), the project implementation unit. At the end of 2021, a proposed action plan with clear timelines and defined responsibilities for each party was ready for validation and approval. The mediated action plan lays the foundation for the implementation of the agreement and will be monitored by the IRM.

Next Steps

The IRM will monitor the implementation of the action plan and will confirm that clarification is given regarding the compensation the Complainants received and whether the individuals omitted were eligible for compensation. The IRM will also consider transferring the complaint for a compliance review investigation to identify possible institutional lessons.





PROJECT:

Dakar Regional Express Train, Phase 1: Dakar–Diamniadio Section

LOCATION:
Senegal

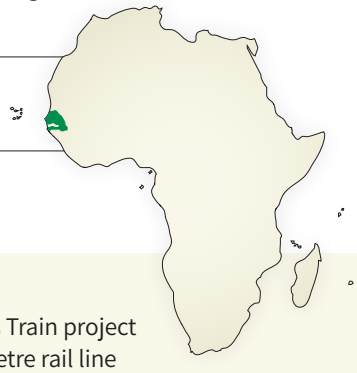
COMPLAINT:
Alleged violations of the Bank's Involuntary Resettlement Policy

COMPLAINANTS:
Lumière Synergie Développement (LSD) and Collectif National

STATUS:
Problem solving: closed;
transferred to compliance review: ongoing

PHASE:
Problem solving

REFERENCE NUMBER:
RQ2019/1



Complaint

In 2019, the IRM received a Complaint from Lumière Synergie Développement and Collectif National regarding the Regional Express Train Project. The Complainants' concerns relate to inadequate compensation, delays in compensation payments to vulnerable project-affected people (PAP), PAP being omitted from the list of people to be compensated, and inappropriate pressure applied to PAP to vacate the rights-of-way.

JUN. 2019: IRM received the Complaint

AUG. 2019: IRM undertook a fact-finding mission

AUG. 2019: IRM registered the Complaint

FEB. 2020: IRM undertook a problem-solving eligibility assessment mission

JUN. 2020: Mediation exercise started

NOV. 2021: IRM transferred the case to the compliance review process for an eligibility assessment

Project

Phase 1 of the Dakar Regional Express Train project entails the construction of a 36-kilometre rail line from Dakar to Diamniadio. The project is designed to increase the availability of public transportation to reduce travel time, increase mobility and reduce congestion.

PROJECT APPROVED:
June 2015

PLANNED COMPLETION:
December 2022

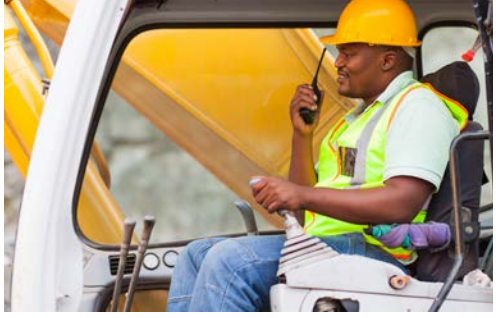
CO-FINANCERS:
Islamic Development Bank, French Development Bank, the French Treasury; and a counterpart, or matching, contribution by the Government of Senegal

Actions/Results

The problem-solving exercise ran from June 2020 until October 2021 and was facilitated by a local mediator. The exercise discussed seven issues related to compensation and resettlement. Since the Parties could not reach any agreements, the IRM, in consultation with the French Development Agency's Complaint Mechanism and the Parties themselves, decided to end the mediation.

Next Steps

Following the conclusion of the problem-solving process and with the ongoing allegations of non-compliance from Complainants, the IRM has recommended that this case be referred for a compliance review eligibility assessment.





PROJECT:

Abidjan Urban Transport Project

LOCATION:
Côte d'Ivoire

COMPLAINT:
Alleged violations of the Bank's Involuntary Resettlement Policy

COMPLAINANTS:
The Mouvement Colombe Ivoire, The Collective of Boribana resident owners, and the traditional chieftaincy of Adjamé village

STATUS:
Closed

PHASE:
Problem solving

REFERENCE NUMBER:
RQ2018/2



Complaint

In September and December 2018, the IRM received three Complaints filed by representatives of project-affected people from different locations and districts of Abidjan covered by the Project. The grievances of the Complainants alleged flaws in the census of affected people, lack of clarity in the calculation of compensation, disagreement on the choice of resettlement sites, the destruction of religious and cultural heritage, and an inappropriate consultation process.

SEP. AND DEC. 2018: IRM received three Complaints

SEP., OCT. AND DEC. 2018: IRM undertook fact-finding missions

DEC. 2018: IRM registered the Complaints

JAN. 2019: Mediation process started

SEP. 2021: Closure of the problem-solving process

Project

The objective of the Abidjan Urban Transport Project is to build a new bridge with access roads to connect the municipalities of Abidjan (Yopougon, Attécoubé, Adjamé and Plateau) as a flagship urban development initiative.

PROJECT APPROVED:
December 2016 (Phase 1) and October 2018 (Phase 2)

PLANNED COMPLETION:
December 2021

CO-FINANCERS:
The Japanese International Cooperation Agency, the Global Environment Facility, and the Government of Côte d'Ivoire

Actions/Results

Five mediation meetings (both in-person and virtual due to the COVID-19 pandemic) were held between January 2019 and March 2021. Of the nine issues discussed at the mediation, agreements have been reached on eight, and actions have been or are being implemented. The remaining issue – between the Complainants (The Collective of Boribana resident owners) and the project implementation unit of the Abidjan Urban Transport Project (AUTP) – concerned the calculation of the value of the Complainants houses and related compensation. The issue was taken to court by the AUTP and was therefore excluded from the mediation in accordance with the IRM's Rules of 2015.

Next Steps

The IRM will monitor the implementation of the agreed upon actions regarding the eight settled issues.





PROJECT:

The Blaise Diagne International Airport Project

LOCATION:

Senegal

COMPLAINT:

Alleged violations of the Bank's Involuntary Resettlement Policy

COMPLAINANTS:

Three Senegalese nationals

STATUS:

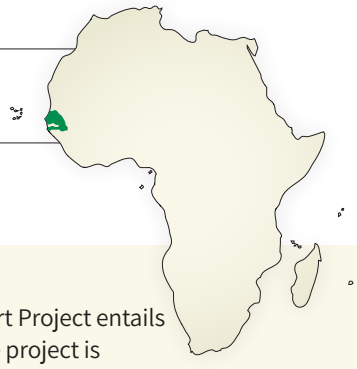
Closed

PHASE:

Problem solving

REFERENCE NUMBER:

RQ 2017/1



Complaint

In September 2017, the IRM received a Complaint filed by three nationals impacted by the Blaise Diagne International Airport Project. The Complainants claimed that they were not adequately compensated for their agricultural lands. They believe that they are eligible for the re-evaluation of their compensation on the basis of the revised resettlement action plan of 2010.

SEP. 2017: IRM received the Complaint

OCT. 2017: IRM undertook a fact-finding mission

DEC. 2017: IRM registered the Complaint

APR. 2018: The Complainants and the Blaise Diagne International Airport began a facilitated dialogue

DEC. 2018: Mediation process started

APR. 2021: Closure of the problem-solving process

Project

The Blaise Diagne International Airport Project entails the construction of a new airport. The project is designed to provide a long-term solution to traffic management in Dakar and supports the Senegalese government's strategy for decongesting the Dakar peninsula and promoting the development of neighbouring regions through a modern and secure state-of-the-art airport facility.

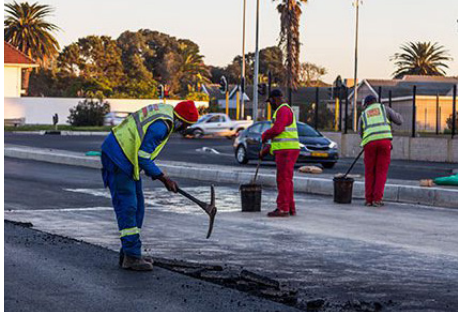
PROJECT APPROVED:
December 2010

PLANNED COMPLETION:
March 2029

CO-FINANCERS:
Agence Française de Développement, Banque Ouest Africaine de Développement, Industrial Development Cooperation, Islamic Development Bank, OPEC Fund for International Development, and Saudi Fund for Development

Actions/Results

In December 2018, the IRM facilitated a mediation between the Complainants and the Blaise Diagne International Airport Project Company to determine whether the Complainants were eligible for a re-evaluation of their compensation and to facilitate an agreement between the Parties. Despite the mediation, both parties were entrenched in their positions, and it was not possible to reach an agreement. Therefore, the problem-solving process was concluded.





PROJECT:

The Nyakararo–Mwaro–Gitega Road (RN18) Upgrade and Asphalting Project/Phase II – Kibumbu–Gitega (Mweya)

LOCATION:
Burundi

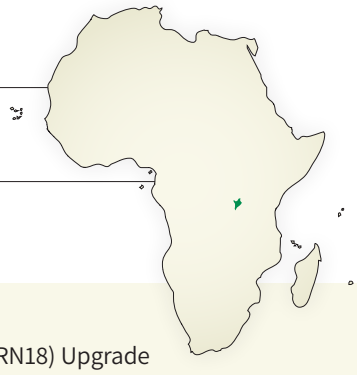
COMPLAINT:
Alleged violations of the Bank's Involuntary Resettlement Policy

COMPLAINANTS:
The family of Daniel Zubatse

STATUS:
Closed

PHASE:
Problem solving

REFERENCE NUMBER:
RQ2021/1



Complaint

In January 2021, the IRM received a Complaint filed by the family of the late Daniel Zubatse. The family's Complaint is regarding the deviation of the Project's road construction which encroached on and destroyed their property without their consultation or consent.

JAN. 2021: IRM received the Complaint

FEB. 2021: IRM registered the Complaint

MAY 2021: Virtual fact-finding meeting with the Complainants

JUN. 2021: Mediation process started

JUN. 2021: Agreement reached between the Complainants and the Burundi Road Agency (project implementation unit)

SEP. 2021: Closure of the problem-solving process

Project

The Nyakararo–Mwaro–Gitega Road (RN18) Upgrade and Asphalting Project/Phase II – Kibumbu–Gitega (Mweya) relates to the upgrading and asphalting of the 24-kilometre long National Highway No. 18. Its objective is to facilitate the movement of goods and persons, with a view to strengthening social cohesion and improving the living conditions of the project's area of influence.

PROJECT APPROVED:
February 2017

PLANNED COMPLETION:
June 2022

CO-FINANCERS:
The Government of Burundi

Actions/Results

After five virtual mediations held in 2021, the Parties (the Zubatse family and the Burundi Road Agency) reached an agreement.

Next Steps

The IRM will monitor the implementation of the agreement and expects that the Complainants will be compensated for the land they lost and for damages.

Spot-Check Process

IRM spot-checks were introduced in 2015 to provide an internal check on the AfDB's use of policies and procedures related to a project's design, appraisal and implementation. As a result of the spot-check process, recommended enhancements to AfDB policies and procedures were incorporated into future projects.

On the recommendation of the IRM's Third Policy Review, spot-checks have been replaced with self-initiated compliance reviews undertaken at the discretion of the IRM Director. Under this new rule, the IRM may conduct a self-initiated review if it receives information from a credible source that an AfDB-financed project has adversely impacted or may adversely impact people, communities or the environment. A review may also be initiated if a complainant is not comfortable filing a complaint due to concerns about possible retaliation. While exchanges with specific complainants would not occur, proxies may be used. All other regular investigation processes and disclosure policies would apply.

2021 Spot-Check Update

In 2021, the IRM completed two spot-checks, its last, and presented findings of non-compliance to Bank Management.

LOCATION:

Burkina Faso

PROJECT:

Sanitation of Peripheral Districts of Ouagadougou (SPAQPO)

Issues of non-compliance include serious health and safety issues surrounding the project, failure to implement the resettlement action plan as required by the AfDB policy, and the need for improved plans to mitigate greenhouse gases.

LOCATION:

Liberia

PROJECT:

Mano River Union Road Development and Transportation Project: Fish Town–Harper Road Paving Project, Phases I & II

Issues of non-compliance include failure to implement the resettlement action plan as required by the AfDB policy, failure to implement the environmental and social management plans as required (resulting in serious shortcomings on health and safety for the workers of the contractor), and failure to rectify the environmental issues identified in several monitoring reports such as the restoration of borrow pits and quarries, and proper waste management.

Based on these findings, the Bank Management prepared corrective Action Plans.

With these two cases completed and presented to the Boards, the spot-check function of the IRM has been retired.

Knowledge Products and Advisory Services

The IRM's advisory role to the AfDB is designed to add to the Bank's institutional knowledge and capacity. We leverage the work we do through the complaints-handling process to identify and advise on potential areas where the AfDB can further strengthen its policies, procedures and practices. Through this process of continuous improvement, we aim to eliminate the causes of complaints, reduce potential harms caused by projects and ultimately ensure sustainability in the Bank's projects.

Sexual Exploitation, Abuse and Harassment (SEAH)
Our work on this issue was designed to enhance and strengthen the processes we have in place to better respond to instances of SEAH in Bank-financed projects. Under the direction of a steering committee of Bank management and IRM staff, we benchmarked the policies of peer institutions and conducted interviews with internal stakeholders to develop guidelines and best practice procedures to prevent, mitigate and respond to SEAH incidents in Bank-financed projects. The resulting Advisory Note will be reviewed by the Boards in 2022 and implementation by Bank Management will likely follow thereafter. To complement this work, the IRM spearheaded an initiative to develop specialized training for independent accountability mechanisms to manage investigations into gender-based violence and SEAH in development projects.

Cultural Heritage and Spiritual Issues
In May 2021, we published a Knowledge Report highlighting the lessons learned during the IRM's complaint investigation into the Uganda-based Bujagali Hydropower Project's Knowledge Project. The research focused on the social requirement to preserve cultural heritage and on respecting spiritual issues while implementing Bank-financed projects. Its publication helps to raise awareness of these issues and expands institutional learning at the Bank.



In 2021, IRM advisory activities focused on three issues:

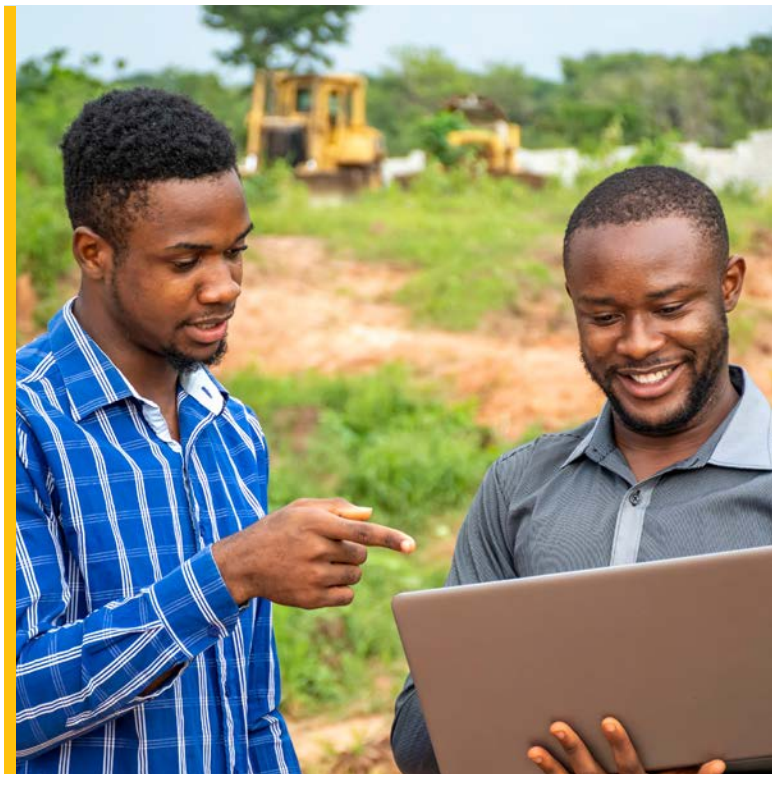
- → Sexual exploitation, abuse and harassment (SEAH)
- → Protecting against retaliation
- → Cultural heritage preservation

Protecting Against Retaliation
Among the important recommendations of the IRM Policy Review was the requirement for us to adopt a zero-tolerance standard for retaliation against complainants. Complaints alleging fear of retaliation are on the rise. In response, we developed a toolkit to help us address the risks of retaliation against complainants, and we will continue to refine it in 2022. An Advisory Note is also being considered to address risks of retaliation against people in project-affected areas who file a complaint or participate in an investigation with the IRM.

Communications and Outreach

The IRM's communications and outreach activities help raise awareness of our organization's mandate and function with the aim of expanding access to the mechanism for our stakeholders – especially for the project-affected people that the mechanism is designed to serve. Our biggest challenge in this endeavour is letting our stakeholders know we exist. People are not able to bring forward their complaints if they are not aware of the mechanism's existence.

Our 2021 communications and outreach initiatives focused on implementing the recommendations of the IRM Policy Review and disseminating information about our new policy framework. For example, in 2021, we began development of a stand-alone website for the IRM to enhance engagement with CSOs, complainants and their representatives, and others. Our new website is expected to launch in mid-2022. We outline other highlights of our outreach efforts on the page following.



SNAPSHOT

IRM's Complaints Handling 2006–2021

Since its inception in 2006, the IRM has handled 22 complaints. This is equal to 0.76 complaints for every 100 AfDB-funded projects. Comparatively, our peers at other multilateral development banks received an average of 1.54 complaints per 100 projects approved.

While a direct comparison is difficult due to differences in the type and scale of financed projects, this difference may suggest that the type of projects being financed by the AfDB are less prone to complaints. It also may suggest that we need to enhance our outreach and awareness efforts to ensure that stakeholders know we exist, know what our mandate is, who is eligible to use our recourse mechanism and how to contact us. We will continue to track and analyze these metrics going forward.



Highlights of Our Outreach to Bank Staff

Keeping AfDB staff informed about the IRM's work is critical to our collective success. In 2021, we:

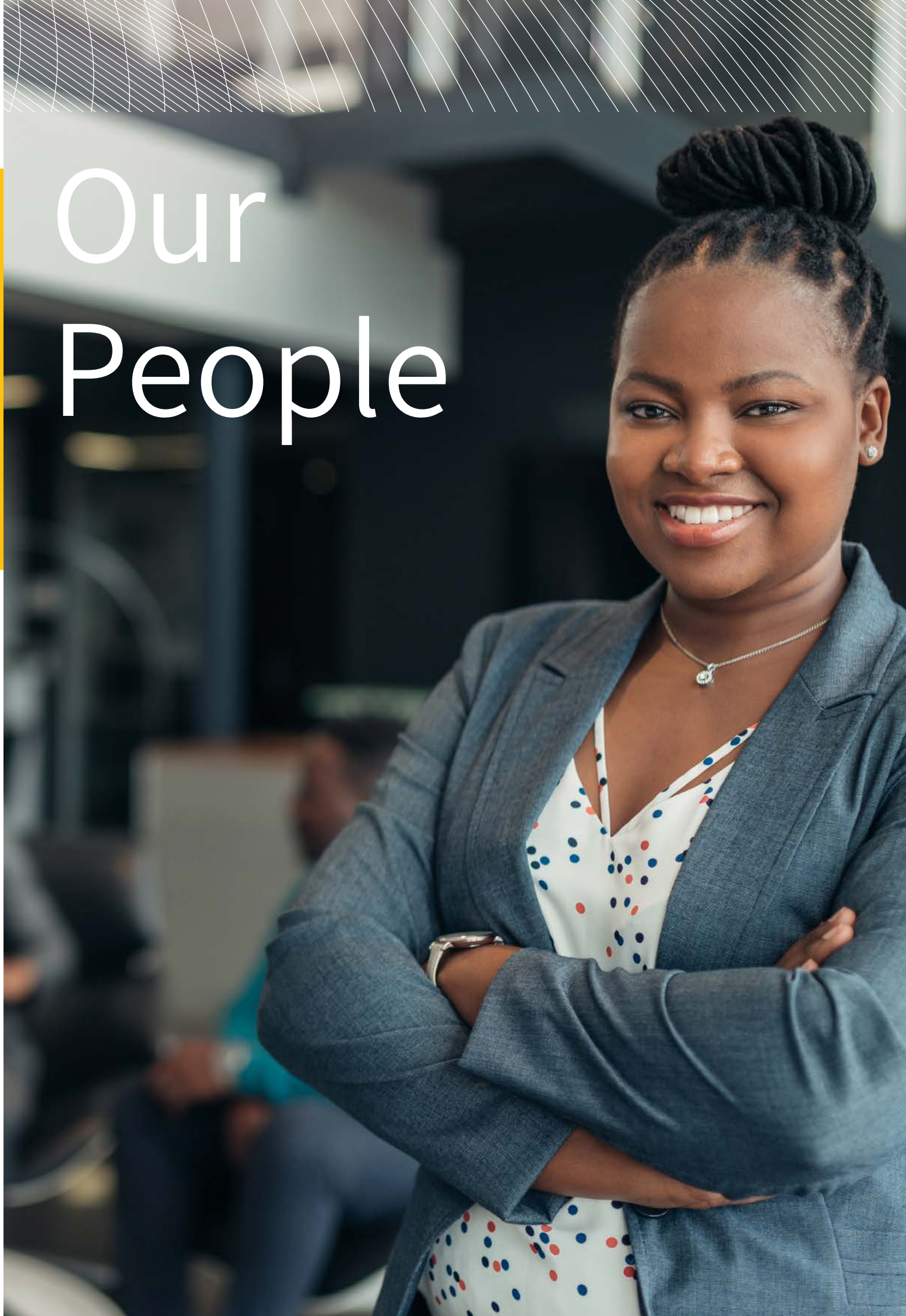
- → Presented a webinar, "Understanding and Supporting the Work of the IRM in West Africa," for Bank staff in Anglophone West Africa (Nigeria, Ghana, Liberia and Sierra Leone). 48 participants and country offices learned about the IRM's mandate, functions, complaints-handling processes and stakeholders, as well as the ways we could support their work and they ours.
- → Introduced the IRM and our work to 191 new Bank employees through four virtual Induction and Onboarding events.

Highlights of Our Outreach to Stakeholders

We are committed to raising awareness and promoting accessibility to project-affected people by enhancing our engagements with CSOs and with project implementation units (PIUs), the organizations that execute the projects financed by the AfDB. In 2021, we:

- → Presented two outreach events for CSOs in Southern and Central Africa which reached 127 participants, and we held two information events reaching approximately 40 CSO representatives who actively contributed to IRM's New Policy Framework.
- → Engaged with over 1,700 PIUs at 12 national trainings organized by the Bank's Safeguard and Compliance Department in French-speaking and English-speaking African countries. The trainings focused on the Bank's Environmental and Social Safeguards, accountability and good governance in projects funded by multilateral development banks (MDBs), the enhancement of development outcomes for local communities, accessibility and equitability issues, and the IRM's new Rules.
- → Presented at both the IAMnet Annual Meeting in September 2021 and in an online workshop hosted by the UN's Office of High Commissioner for Human Rights and the Global Climate Fund's IRM in October 2021 in which the IRM Director gave a talk on the effectiveness of grievance mechanisms.

Our People



IRM staff members are dedicated professionals who serve as the backbone of the organization. They are the face of the IRM and are essential to our success. We rely on them to uphold the IRM's core values as they engage with our stakeholders and each other. In this section, we look at how we develop staff capacity, engage with them and foster an inclusive culture at the IRM.



















SPOTLIGHT

Climb Every Mountain

To support the physical and mental health of our staff during pandemic-enforced work-from-home routines, we challenged ourselves to climb Mount Kilimanjaro, Africa's highest peak, virtually, using an online app. IRM staff members, pictured here, completed the 97-kilometre virtual climb to "the roof of Tanzania," walking the distance in their local communities over a two-month period. Beyond providing a sense of personal accomplishment (and a T-shirt) to participants, the Mount Kilimanjaro Challenge plants five trees for every person who climbs the mountain. Together, the IRM's team planted 50 trees, representing about 1,100 kilograms of carbon absorbed per year.

The challenge of ascending a mountain peak served as a suitable metaphor for us in 2021 and helped to both keep our spirits high and to encourage us to keep fit. You can see our staff dressed in their Challenge T-shirts above.

"The Virtual Mount Kilimanjaro Challenge has been a race for physical and mental wellbeing but also a race against climate change – there was no loser; every participant won."

— ROSE SAH
IRM COMPLIANCE AND OUTREACH ASSISTANT

Building Capacity

The IRM's focus on developing staff capacity is designed to equip staff with the skills, knowledge and career development opportunities they need to be successful in their jobs today and in the future.

The ongoing COVID-19 pandemic both challenged and inspired us in 2021. We introduced innovative ways to support each other and stay engaged while working remotely. These included:

- → Group 'Pomodoro' productivity sessions where, twice a week, we gathered virtually to work together on individual tasks and share challenges.
- → Learning Hub events, inviting staff to engage with subject matter experts on diverse professional development topics such as recognizing the importance of gender in development projects; understanding how to conduct investigations remotely using drones and satellite imagery, and using specialized complaints databases to better understand trends.
- → "Show-It-Off-Tuesdays," an online space that featured peer-to-peer learning and touched on topics such as an analysis of advisory notes at other IAMs, building staff development learning plans and exploring the potential uses of Microsoft Publisher.

We also joined together to climb Mount Kilimanjaro (virtually). Read more about this voluntary staff challenge on page 43.

The remote work-around solutions we adopted during the pandemic accelerated the IRM's adoption of digital technologies and collaboration tools, an unanticipated outcome that will help us more effectively serve our stakeholders well after the pandemic finally subsides.

Launching Our First Staff Engagement Survey

The IRM launched its first staff engagement survey in 2021. This management and accountability tool is designed to:

- → Provide a platform for staff to reflect on their experiences and voice concerns, and
- → Support the development of action plans to address concerns and increase the level of engagement.

The IRM's overall staff engagement score for 2021 was 3.94 out of 5. Of the topics presented in the survey, the staff felt most positively about the IRM's teamwork and inclusion and least positively about its career development and strategic alignment. We aim to maintain our overall engagement score of 3.94 or higher in 2022.

IRM STAFF ENGAGEMENT SCORE:

SURVEY CONDUCTED JUNE 2021

LOWER SCORE ASPECTS:

- GROWTH & CAREER DEVELOPMENT
- LEADERSHIP & RESPONSIVENESS
- STRATEGIC ALIGHMENT



*OVERALL STAFF ENGAGEMENT INDEX SCORE BASED ON THE AGGREGATE SCORING OF ALL ENGAGEMENT QUESTIONS

HIGHER SCORE ASPECTS:

- TEAMWORK
- INCLUSION

Diversity and Inclusion

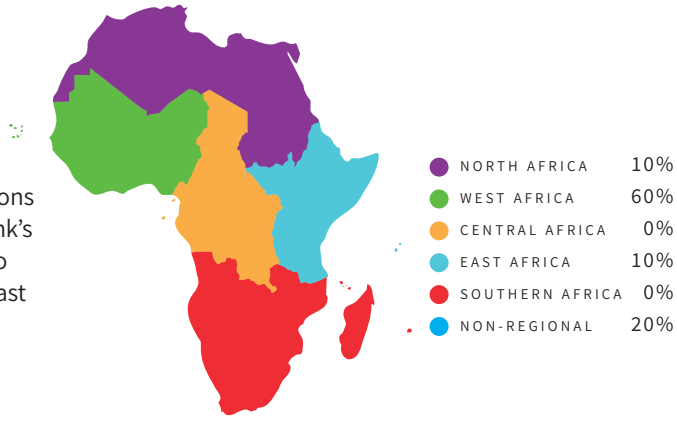
At the IRM, we are committed to nurturing a diverse and high-performing team of professionals who feel valued and are motivated to deliver on the IRM's strategy.



IRM Staff

Geographic and Linguistic Representation

The IRM's 10 staff members hail from 8 different countries representing three of the five African regions covered by the Bank. This compares well to the Bank's regional diversity profile as a whole. [5] In addition to English and French, our team members speak at least 11 other languages used in Africa, including Arabic, Kiswahili, Portuguese, Wolof, Fon and Mina.



TOTAL

60% - FEMALE

40% - MALE



PROFESSIONAL (EL, PL AND LP)

43% - FEMALE

57% - MALE



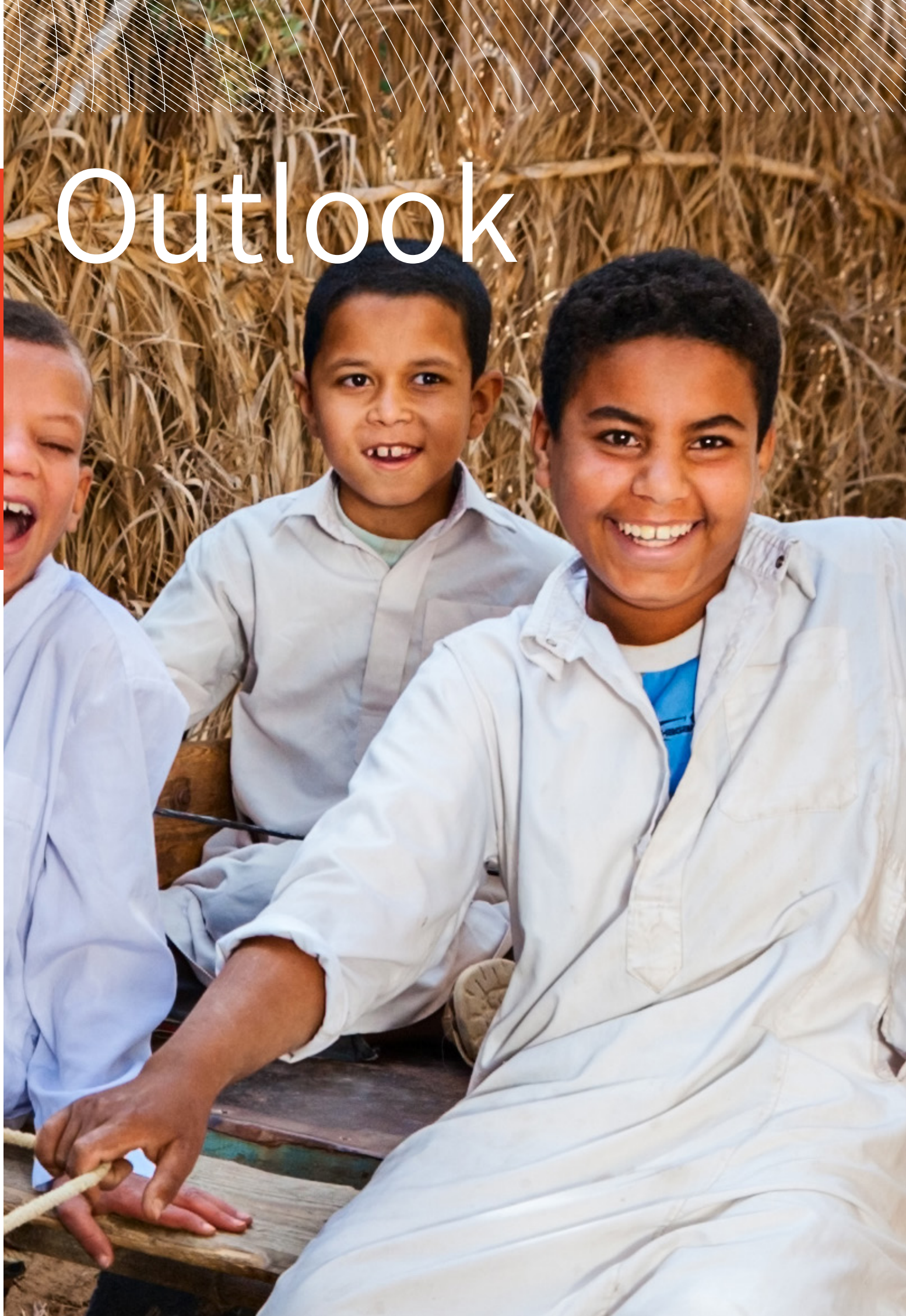
Gender Representation

In terms of gender, the IRM team is made up of six staff members who identify as female and four who identify as male.[6] Of the IRM's 10 staff, seven positions are held at the Professional Level (EL, PL and LP) (57% male and 43% female) and three positions are held at the General Support Staff Level (GS) (100% female).

[5] For purposes of comparison, the Bank's regional diversity profile in 2021 was: North Africa (9.5%), West Africa (41.7%), Central Africa (8.1%), East Africa (16.5%), Southern Africa (9.5%), and Non-Regional (14.5%).

[6] As a comparison, the 2021 gender breakdown of the Bank as a whole was 38% female and 62% male.

Outlook



IRM's 2022 Ambitions

We are excited about our new operation rules and procedures, our new strategy and our ambitious plans for 2022. Our plans include:





Fostering a More Gender-Responsive and Culturally Appropriate Mechanism:
Our new mandate commits us to ensuring that our complaints process is both gender responsive and culturally appropriate. We are going to be reflecting on these issues together with our stakeholders to identify areas where we can improve and practical steps to advance this goal.

Strengthening Engagement with Our Stakeholders:
In this area, we plan to establish a multi-stakeholder advisory council and develop a regional engagement program. We will also continue to develop effective stakeholder feedback systems to better inform our decisions and help to continually assess and improve our performance.



Improving the Complaints-Handling Process:
We will be working to improve our complaint-handling processes by establishing robust workflow processes and standardizing reporting formats. This will improve consistency and quality, and achieve more timely outputs. We will also be developing new compliance tools and strengthening our problem-solving interventions through peer-to-peer workshops. An emphasis on reprisals will also be evident as we refine our anti-retaliation tools and start collecting metrics on this increasingly important issue facing complainants.

Providing Relevant Advice to Bank Management:
In 2022, we will be publishing what we believe will be an important new Advisory Note on how to address incidences of sexual exploitation, abuse and harassment (SEAH) within Bank-funded operations. This paper and the recommendations it will bring forward will help to raise awareness of SEAH in operations among the Bank's staff, its borrowers and the contractors that carry out projects financed by the Bank.





Expanding Accessibility:
Our plans for 2022 include the launch of a stand-alone website for the IRM and the roll-out of a new communications strategy. We will be placing a greater emphasis on using digital technologies to reach stakeholders across Africa and making our information more accessible by translating key materials into Arabic, Kiswahili and Portuguese, in addition to English and French.

Reporting:
In 2022, we plan to enhance our transparency and disclosure reporting by continuing to draw linkages between our strategic priorities and our outcomes, connecting our strategies to the UN Sustainable Development Goals, setting targets in collaboration with our stakeholders and metrics to track our progress to them, and leveraging our accountability report as a year-round communications tool to better inform our stakeholders about the work we do and how they can utilize our services.



Appendices



Appendix 1:

IRM 2021 Budget

ADMINISTRATIVE BUDGET APPROVED (IN UAC) *	2020	2021
Complaints Handling	290,957	228,419
Outreach and Communication	73,903	102,160
Institutional Learning & Capacity Building	141,532	175,826
Administrative Activities	6,837	6,875
TOTAL	**513,230**	**513,280**

*These amounts include consultants, missions, events and meetings' budgets and exclude salaries and staff costs.

Appendix 2:

Abbreviations, Terms and Definitions

Advisor
An individual or organization who has been engaged by a Complainant to provide them with advice and/or support throughout the complaints-handling process. Advisors may not represent the Complainant or make decisions on their behalf.

Bank Group-Financed Operation
Any operation funded by the AfDB/ ADF, The Nigeria Trust Fund and other special funds administered by the Bank, approved by the Boards of Directors or Management or under consideration for financing by Bank Management.

Boards of Directors
Boards of Directors of the African Development Bank and African Development Fund.

Borrower/Client
Borrower: The party to the Loan Agreement to whom the Loan is made. **Client:** An entity that is eligible to receive financing, investment, or technical assistance from the Bank on non-sovereign terms, to whom financing or investment flows will be disbursed, and who is responsible for fulfilling specific conditions and for repayments to the Bank as per financing agreements, in the case of non-grant resources.

Business Days
Days in which the Bank is open for business at headquarters.

CODE
Boards' Committee on Operations and Development Effectiveness.

Compliance Review Report
Report resulting from a Compliance Review of a Complaint to IRM.

Compliance Eligibility Assessment Report
Report prepared by IRM to evaluate a Complaint for Compliance Review.

Complainant
Signatories to a Complaint, those who have submitted a Complaint.

Complaint
A written Complaint submitted to the IRM raising issues of actual or potential harm resulting from alleged non-compliance by the Bank Group with its policies and procedures.

CSO
Civil Society Organizations include but are not limited to non-governmental organizations, peoples and professional organizations, trade unions, cooperatives, consumer and human rights groups, women's associations, youth clubs, independent radio, television, print and electronic media, neighbourhood or community-based coalitions, religious groups, academic and research institutions, grassroots movements and organizations of Indigenous Peoples.[7]

Financial Intermediaries (FIs)
Entities that act as middle agent between two parties in a financial transaction such as a Commercial Bank or Investment Bank. Financial Intermediaries are a key instrument for AfDB to promote sustainable financial markets and provide a vehicle to channel AfDB funding to the micro, small and medium size enterprise.

Independent Recourse Mechanism
The independent complaints mechanism of African Development Bank Group established by Board Resolution.

Management
African Development Bank Group as an institution involved in the design, appraisal and/or implementation of Bank Group-Financed Operations.

MAP
Management Action Plan.

Party
One of the people or sides involved in a formal agreement or dispute.

Policies and Procedures
Policies and Procedures of relevance to IRM Complaints decided upon in agreement between IRM and Management, and subject to constant update.

Problem-solving Assessment Report
Assessment Report prepared upon registration of a Complaint for Problem solving.

Problem-solving Report
Report prepared at the end of a Problem-solving exercise.

Register
A Complaints Register is a web-based tool to record details of Complaints received by the IRM and tracks the Complaints-handling process.

Representative
An individual or organization who has been retained and authorized by a Complainant to represent their interests and make decisions on their behalf with their consent.

Reprisal
A Reprisal is any adverse act taken against someone because they made a Complaint disclosure or participated in a Complaint investigation. Reprisals can come in many forms and may not always be obvious.

[7] AfDB Framework for Enhanced Engagement with Civil Society Organizations, 2012, P4.

Appendix 3

IRM Registry of Registered Complaints

AS OF DECEMBER 31, 2021

	DATE OF REGISTRATION	COUNTRY	PROJECT	STATUS	
1	7 Dec. 2021	Uganda	CASE NO. **RQ2021/4** Multinational Lakes Edward and Albert Integrated Fisheries and Water Resources Management (Leaf II) Project	**Compliance Review**	Eligibility assessment mission planned for Q1 of 2022.
2	5 Nov. 2021	Uganda	CASE NO. **RQ2021/3** Wadelai Irrigation Scheme Project under the Farm Income Enhancement and Forestry Conservation Project – Phase 2 (FIEFOC-2)	**Compliance Review**	Eligibility assessment mission planned for Q1 of 2022.
3	25 Feb. 2021	Kenya	CASE NO. **RQ2021/2** The Construction Works for Kapenguria-Makutano and Chepareria Towns Sewerage System Project	**Compliance Review**	Compliance review process ongoing.
4	22 Feb. 2021	Burundi	CASE NO. **RQ2021/1** Nyakararo–Mwaro –Gitega (RN18/ Phase II, Kibumbu–Gitega (Mweya): 24 km road project	**Problem/Solving**	Mediation closed in September 2021 and Closure Report to be submitted to the Boards by Q1 of 2022.
5	19 Aug. 2019	Senegal	CASE NO. **RQ2019/1** Dakar Regional Express Train Project, Phase I	**Compliance Review** **Problem Solving**	Problem solving closed. Case transferred to Compliance Review (currently in progress).
6	28 Dec. 2018	Côte d'Ivoire	CASE NO. **RQ2018/2** Abidjan Urban Transport Project	**Compliance Review** **Monitoring**	Problem solving closed. Report submitted to Boards in September 2021.
7	26 Dec. 2018	Kenya	CASE NO. **RQ2018/1** Mombasa–Mariakani Road Project	**Problem Solving**	Problem-solving closing report being finalized. Case forwarded to Compliance Review Eligibility Assessment.
8	14 Dec. 2017	Senegal	CASE NO. **RQ2017/1** Blaise Diagne International Airport Project	**Problem Solving** **Closed**	Problem solving finalized. Complaint closed.
9	28 Nov. 2016	Guinea	CASE NO. **RQ2016/3** Multinational Road Development and Transport Facilitation Program within the Mano River Union–Guinea Section	**Compliance Review** **Monitoring**	IRM 1st Monitoring Report on implementation of Management Action Plan approved by the Boards in December 2021.

Appendix 3

IRM Registry of Registered Complaints

AS OF DECEMBER 31, 2021

	DATE OF REGISTRATION	COUNTRY	PROJECT	STATUS	
10	15 Jun. 2016	Senegal	CASE NO. **RQ2016/2** Construction of 125 MW Sendou Coal-Fired Power Plant	**Compliance Review** **Monitoring**	IRM 2nd Monitoring Report on implementation of Management Action Plan approved by the Boards in December 2021.
11	12 May 2016	Mali	CASE NO. **RQ2016/1** Diversification of the activities of Modern Mills (M3) in Mali	**Compliance Review** **Monitoring**	IRM 2nd Monitoring Report on implementation of Management Action Plan approved by the Boards in December 2021.
12	7 Oct. 2015	Kenya	CASE NO. **RQ2015/3 (Bis)** Outer Ring Road Improvement Project	**Compliance Review** **Problem Solving** **Closed**	Problem solving finalized. Complaint closed.
13	9 Jul. 2015	Kenya	CASE NO. **RQ2015/3** The Nairobi River Rehabilitation and Restoration Program: Sewerage Improvement Project	**Problem Solving** **Closed**	Problem solving finalized. Complaint closed.
14	7 Mar. 2014	Uganda	CASE NO. **RQ2007/1** Improvement of health service delivery at Mulago Hospital and in the City of Kampala	**Problem Solving** **Closed**	Problem solving finalized. Complaint closed.
15	12 Jun. 2012	Tanzania	CASE NO. **RQ2012/1** Road Sector Support Project II	**Problem Solving** **Closed**	Problem-solving monitoring of Agreement completed. Complaint closed.
16	25 Jul. 2011	Senegal	CASE NO. **RQ2011/1** Dakar–Diamniadio Highway Project	**Problem Solving** **Closed**	Problem-solving monitoring of Agreement completed. Complaint closed.
17	7 Oct. 2010	South Africa	CASE NO. **RQ2010/2** Medupi Power Project	**Compliance Review** **Monitoring**	IRM 5th Monitoring Report on implementation of Management Action Plan approved by the Boards in December 2021.
18	29 Jul. 2010	Morocco	CASE NO. **RQ2010/1** Construction of the Marrakech–Agadir Motorway	**Compliance Review** **Problem Solving** **Closed**	Problem-solving monitoring of Agreement completed. Complaint closed.

Appendix 3

IRM Registry of Registered Complaints

AS OF DECEMBER 31, 2021

	DATE OF REGISTRATION	COUNTRY	PROJECT	STATUS	
19	15 Jul. 2009	Egypt	CASE NO. **RQ2009/2** Nuweiba Combined Cycle Power Project	**Problem Solving Closed**	Problem-solving monitoring of Agreement completed. Complaint closed.
20	22 Jul. 2009	Ethiopia	CASE NO. **RQ2009/1b** Gibe III Hydroelectric Power Project	**Compliance Review Closed**	Bank is no longer considering financing the project. Complaint closed.
21	26 Mar. 2009	Ethiopia	CASE NO. **RQ2009/1** Gibe III Hydroelectric Power Project	**Problem Solving Closed**	Problem solving stopped. Complaint closed.
22	4 Jun. 2007	Uganda	CASE NO. **RQ2007/1** Bujagali Hydropower Projects	**Compliance Review Closed**	Monitoring of Management Action Plan completed. Complaint closed

Appendix 4

IRM Register of Unregistered Complaints

FROM JANUARY TO DECEMBER 2021

	DATE RECIEVED	COUNTRY	PROJECT	ISSUES	REASON FOR NON-REGISTRATION
1	26 Jun. 2021	Senegal	Agriculture and Agro-Industry Department (AHAI) projects: Group Risk Management Function (PGFC) & Cashew Development Support Project (PADA)	Complaint regarding a consultant's selection procedure	The complaint is outside of the IRM mandate as it is related to procurement/ recruitment issues. The complaint was transferred to the Bank's Procurement Division.
2	25 Jun. 2021	Kenya	Nairobi Rivers Basin Rehabilitation and Restoration Program: Sewerage Improvement Project, Phase II	Complaint concerning eviction without resettlement	The complaint did not meet registration criteria for the 2015 Rules (legal proceedings). The IRM, together with a CSO, is working with the complainants to have them resubmit under the 2021 Rules.
3	07 Apr. 2021	Kenya	Geothermal Development Company's (GDC) geothermal power plant in the town of Tiaty	Complaint regarding no compensation for land, area pollution, and corruption of leaders	The complaint is outside of the IRM mandate since the Bank did not finance the project.
4	29 Mar. 2021	Togo	Agropole pilote du bassin de la Kara (PTA-Togo)	Complaint regarding a project's procurement procedure	The complaint is outside of the IRM mandate as it is related to procurement/ recruitment issues.
5	18 Mar. 2021	Comoros	N/A	Request for the suspension of a loan request submitted by the current government	The complaint is outside of the IRM mandate as it is related to political issues.

Appendix 5

IRM 2022 Material Topics and Definitions

CORE TOPICS	WHAT THIS MEANS
Enable Trust	Establish legitimacy among the stakeholder groups that the mechanism is intended for by demonstrating independence and accountability for the fair conduct of grievance processes
Create Awareness	Create awareness of the IRM and its processes among potential users of the mechanism through direct communications or through its network of conduits
Enhance Accessibility	Provide appropriate assistance to people who face barriers to access the mechanism, including gender-responsive and culturally appropriate assistance
Provide a Clear and Timely Complaint Process	Provide a straightforward description of the Complaints Process, including: → the process options and the criteria for their use → the timelines and potential outcomes for each → the mechanisms for monitoring and reporting on outcomes
Treat All Parties Equitably	Ensure that aggrieved parties have reasonable access to the information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms
Ensure Transparent Processes	Keep parties to a grievance informed about its progress and provide sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake
Demonstrate Respect of Human Rights in Complaints Process	Ensure that outcomes and remedies of the IRM process are in accordance with internationally recognized human rights
Effectively Deliver Remedy to Complainants	Monitor that mechanism has the necessary tools to recommend suitable remedial actions for the Bank to address any harms it is directly or indirectly responsible for
Continuously Improve	Identify and apply lessons for improving the mechanism and preventing future grievances and harms

Appendix 5

IRM 2022 Material Topics and Definitions

ADDITIONAL TOPICS	WHAT THIS MEANS
Stakeholder Engagement and Responsiveness	Establish a strategic approach to strengthen IRM'S stakeholder engagement practices and relationships in order to respond to the individual needs of each
Diverse and Motivated Team	Establish and nurture a diverse and high-performing team of professionals who feel valued and are motivated to deliver on the IRM's strategy
Economic Efficiency and Contributions to Economic Value	Maximize economic efficiencies and the economic value IRM contributes via its operations, through employment, contracts, supporting regional suppliers, and other contributions
Governance and Ethical Conduct	Establish an organizational structure that demonstrates leadership accountability and the highest level of ethical conduct
Anti-retaliation and Reprisal Policies (Confidentiality)	Implement policies and practices to protect complainants against possible retaliation and to honour requests for confidentiality when appropriate
Public Influence and Thought Leadership	Lead the policy and technical agenda through research, analysis and insights into the complaints the IRM receives, its contributions to Bank policy and regulation, and its participation in key international, regional and national forums
Health and Safety (COVID-19)	Establish systems to promote a health and safety culture and to advance continuous improvement, including the ability to adapt to health-related circumstances such as the pandemic while continuing to provide quality service to stakeholders
Community Involvement (Contribution to SDGs)	Create opportunities for the IRM and its employees to contribute in their communities and globally through the UN Sustainable Development Goals
Environmental Sustainability	Promote environmental sustainability in our operations to address the climate crisis and other environmental issues
Quality and Relevance of Communications/ Information	Implement a communications strategy that will deliver the right information to the right stakeholders through the right channels


CONSTRUCTION



2021 ACCOUNTABILITY REPORT

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