INDEPENDENT REVIEW MECHANISM

2020 ANNUAL REPORT



IRM
Independent Review Mechanism
MII Mécanisme indépendant d'inspection

AFRICAN DEVELOPMENT BANK GROUP
GROUPE DE LA BANQUE AFRICAINE DE DÉVELOPPEMENT

The Compliance Review and Mediation Unit (CRMU)



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AND

Acronyms and Abbreviations

AEI	Afrique-Europe Interact
AFD	Agence Française de Développement (French Development Agency)
AIBD	Blaise Diagne International Airport)
APIX	National Agency for Promotion of Investment and Major Works
ARU	Agroforestry Resources Unlimited
AUTP	Abidjan Urban Transport Project
CAO	Compliance Advisor Ombudsman
CAP	Corrective Action Plan
CRP	Compensation and Resettlement Plan
EIB	European Investment Bank
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ETAP	Tunisian Company of Petroleum Activities
FGD	Flue-Gas Desulphurization
FIP	Forest Investment Program
FMO	Netherlands Development Ban
FRAP	Full Resettlement Action Plan
FTHRP	Fish Town-Harper Road Paving Project
GEF	Global Environment Facility
GRC	Grievance Redress Committee
GZDSP	Green Zones Development Support Project
IP	Investment Program
IsDB	Islamic Development Bank
ISS	Integrated Safeguards System
KEFRI	Kenya Forestry Research Institute
KeNHA	Kenya National Highways Authority
KFS	Kenya Forest Service
KfW	German Development Bank
MCWAP	Mokolo-Crocodile Water Augmentation Project
MINEE	Ministry of Mines and Water Resources
NAPE	National Association of Professional Environmentalists
NCWSC	Nairobi City Water and Sewerage Company
NRBRRP	Nairobi Rivers Basin Rehabilitation and Restoration Program
NTZDC	Nyayo Tea Zones Development Corporation
PESD	Power Systems Development
PERN1	Renewable Energy Division
PZTA-SUD	South Agro-Industrial Processing Zone Project
RAP	Resettlement Action Plan
RDGE	East Africa Regional Development and Delivery Office
SESA	Strategic Environmental and Social Assessment
SIP	Sewerage Improvement Project
SPAQPO	Project for the Sanitation of Peripheral Districts of Ouagadougou
STGP	South Tunisian Gas Pipeline
UA	Unit of Account: As of 31 December 2020, 1 UA = 1.44 USD = 1.18 EUR
UETCL	Uganda Electricity Transmission Company Ltd
XSP	Expanded Supervision Reports



Executive Summary

Notwithstanding the significant impact that COVID-19 had on our work, the IRM (Independent Review Mechanism) has managed to make continued progress in handling complaints through the problem-solving and compliance review functions, as well as contribute to the Bank's on-going institutional learning through its advisory work. It was also able to advance the work of the IRM's policy review process and undertake a number of important outreach activities to help raise awareness of the Mechanism.

Regarding **Problem-solving Exercises**, the IRM pressed on with the handling of four cases which included (i) The Mombasa-Mariakani Highway Project in Kenya, (ii) The Abidjan Urban Transport Project in Côte d'Ivoire, (iii) The Regional Express Train, and (iv) The Dakar Blaise Diagne International Airport projects in Senegal. Mediation efforts between Project Implement Units and Requestors regarding the Mombasa-Mariakani Highway Project, and the Abidjan Urban Transport Project, have led to some noteworthy progress. Some potential areas of agreement and a way forward have also been identified by the parties involved in the Regional Express Train Project, but thus far there is little progress to report on the problem-solving exercise related to the Blaise Diagne International Airport Project.

In terms of **Compliance Reviews**, the IRM was set back during the year by travel restrictions due to COVID-19 and had to pivot quickly to alternative approaches in order to implement effective monitoring of two Management Action Plans (MAP) in South Africa and Senegal. Unfortunately, the pandemic made it difficult for us to complete monitoring site missions in Mali and Guinea, but staff responded quickly to implement contingency measures to continue monitoring these projects from afar by obtaining updated project information from complainants and Bank management staff.

Fortunately, the IRM was able to complete two spot-check missions in Kenya just before the travel restrictions were imposed and these were sent to the Boards for their review at the end of the year. At the same time a desktop review of a spot-check was initiated for a project in Liberia within 2020 and this is expected to go to the Boards in 2021.

IRM's Third Policy Review also kicked off at the beginning of the year with the objective of improving its effectiveness and performance. As part of the review process an independent review team carried out a series of consultations and interviews with both African and international stakeholders, and this included IRM's first-ever online public consultation. The stakeholder consultation process will continue into 2021 and culminate in a series of recommendations aimed at improving the IRM's effectiveness and revising its rules and procedures which guides how the IRM carries out its work.

Some progress was also achieved in **Communications and Outreach** to help raise awareness of the mechanism within specific target groups. Several important activities targeting both IRM's internal and external stakeholders were conducted to align with IRM's 2020 Work Program. These activities also had to adapt to the new-normal caused by the COVID-19 pandemic by making extensive use of virtual or online communications platforms. The IRM also developed some new communications tools in 2020 including some media pieces and a new video to help enhance communication with its external stakeholders.



1 Complaints Handling

1.1. PROBLEM-SOLVING CASES

In 2020, the IRM made some progress in the handling of four ongoing problem-solving cases. These cases relate to (i) **The Mombasa-Mariakani Highway Project in Kenya, (ii) The Abidjan Urban Transport Project in Côte d'Ivoire, (iii) The Regional Express Train, and (iv) The Dakar Blaise Diagne International Airport projects**, both in Senegal. In the case regarding the Mombasa-Mariakani Highway Project and the Abidjan Urban Transport Project, the mediation efforts led to some progress between the Project Implementation Units (PIUs) and the Requestors. Some potential areas of agreement and a way forward were identified by the parties in the case of the Regional Express Train Project. The results of the Blaise Diagne International Airport problem-solving exercise have not yet yielded a mutually acceptable agreement between the parties, and the IRM will be re-evaluating its involvement in this case in early 2021.

1.1.1. AGREEMENT REACHED FOR THE MOMBASA-MARIAKANI HIGHWAY PROJECT IN KENYA

The mediation process in the Mombasa-Mariakani Highway project has led to a tentative agreement between the representatives of project-affected people and the project implementing agency, the Kenya National Highways Authority (KeNHA), following a virtual plenary mediation meeting facilitated by the IRM on 26 November 2020. At year-end a proposed action plan with clear-cut timelines and defined responsibilities for each party involved, was ready for validation and approval, which will lay the foundation for the implementation of an agreement. The agreement framework seeks to address the claims made by the Requestors regarding some project-affected people (PAPs) who were not included in the list of people entitled to compensation, and the absence of a proper breakdown of the valuations that were paid in the compensation awards.

Before starting the mediation process, the IRM undertook a fact-finding mission to this project in March 2018 to assess and establish whether the complaint met the criteria for registration and to gather additional information. The IRM collaborated in handling the complaints relating to this Project with the Complaint Mechanism of the European Investment Bank, a co-financer of this project.

THE MOMBASA-MARIAKANI HIGHWAY PROJECT IN KENYA



PROJECT

- **Approved by** AfDB's Board of Directors in March 2015
- **Planned completion date** 30 June 2022
- **Co-financed by** The German Development Bank (KfW), European Investment Bank (EIB), the EU-Africa Infrastructure Trust Fund and the Government of Kenya
- **Sector** Transport

REQUEST

- **Submitted by** representatives of PAPs from different areas of the project corridor
- **Registered by** IRM in December 2018
- **Alleged violations**: the Bank's Involuntary Resettlement Policy (2003)
- **Status** ongoing

Further information on this Project is available through this link

1.1.2. AGREEMENT REACHED FOR THE ABIDJAN URBAN TRANSPORT PROJECT, CÔTE D'IVOIRE

With IRM's assistance, key stakeholders in the Abidjan Urban Transport Project[1] reached two agreements on key issues relating to resettlement and compensation of the PAPs on 5 August 2020. The stakeholders included the three (3) Requestors (The Adjamé Village chiefdom representatives, the Boribana Resident house owners and the Movement Colombe Ivoire representing a group of NGOs) and the Project Implementation Unit (PIU). The implementation of one of these agreements will enable the PAPs led by the movement Colombe Ivoire to be relocated after the PIU committed to finishing the construction of the resettlement site by December 2020. The other agreement, when implemented will also lead to the same outcome as PAPs from Adjamé led by the chiefdom of that village will be relocated. In the meantime, the chiefdom of the Village of Adjamé and the PIU are working together to find an appropriate resettlement site. A number of field missions were conducted by the IRM on the issues raised by the complainants prior to reaching these agreements.



"The mediation was very good because it allowed us to express our concerns regarding the construction of the 4th bridge in Abidjan.

We think it could be even better if the concept of compliance review- associated with the IRM- was further explained to the project-affected people."

SEKOU TOURE
Representative of PAPs in Côte d'Ivoire

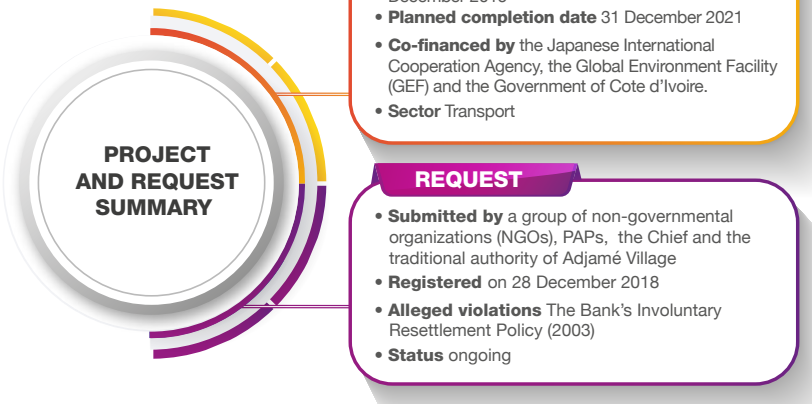
It is noteworthy that one issue related to the calculation of the compensation for 14 PAPs– which was the major concern of the Boribana Resident House owners–was excluded from the mediation because the PIU took the matter to court for lack of agreement with the 14 PAPs.



"What actually mattered for the PAPS in the Abidjan Urban Transport Project was to realize that they have a choice to make and that their choice was listened to in a fair and equitable manner. This makes all the difference. In other words, receiving due consideration. This was my feeling after participating in the mediation exercise with CRMU - and it works!

MBARACK DIOP
Lead Safeguards and Compliance Officer

THE ABIDJAN URBAN TRANSPORT PROJECT, CÔTE D'IVOIRE



Further information on this Project is available through this link

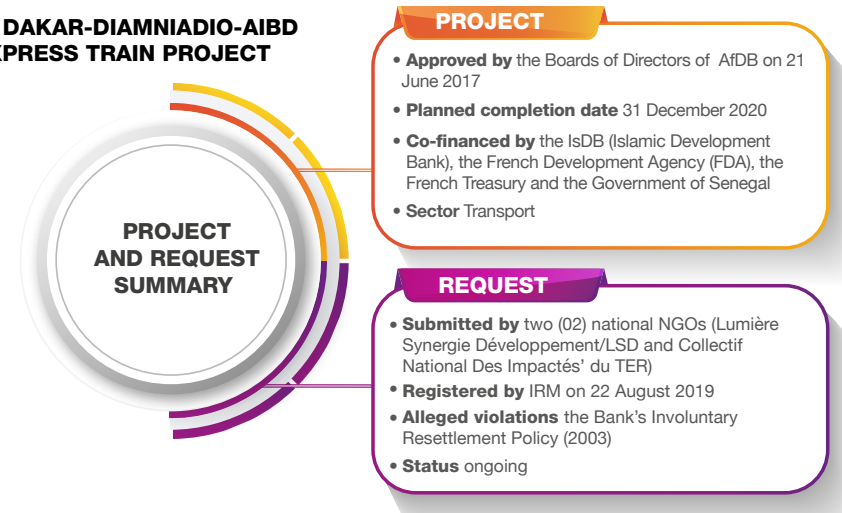
1.1.3. PROGRESS MADE FOR THE SENEGAL - DAKAR-DIAMNIADIO-AIBD REGIONAL EXPRESS TRAIN PROJECT - PHASE I: DAKAR-DIAMNIADIO SEGMENT

The mediation efforts in the case of the Dakar Regional Express Train Project helped parties identify areas of agreements and develop an action plan. This was undertaken through a virtual mediation meeting facilitated by the IRM on 11 December 2020 between the Requestors (Lumière Synergie Développement (LSD) and the Collectif national des impactés - two national NGOs representing the PAPs - and the Project Implementation Unit (the National Agency for the Promotion of Investment in Senegal - APIX). During this meeting, the PIU and the Requestors agreed to discuss issues relating to the delay in the payment of compensation, the lack of compensation for cases not yet submitted to the conciliation committee, the resolution of cases of omission from the compensation list and the issue of resettlement. Three (3) other issues where the potential for agreement was very limited (correction of compensation for some cases; revision of the valuation scheme for the land and the structures; and compensation for loss of land) could not be thoroughly discussed during the mediation meeting.

This meeting was co-organized and facilitated by IRM and the Complaint Mechanism of the French Development Agency (FDA) as FDA is co-financing this Project. The ground rules for the mediation and the seven (7) issues to be covered during the mediation were agreed by the parties in a separate meeting held on 20 February 2020.

It is noteworthy that the mediation meeting of 11 December 2020 was preceded by two missions to Dakar jointly conducted by the IRM and the Complaint Mechanism of the French Development Agency.

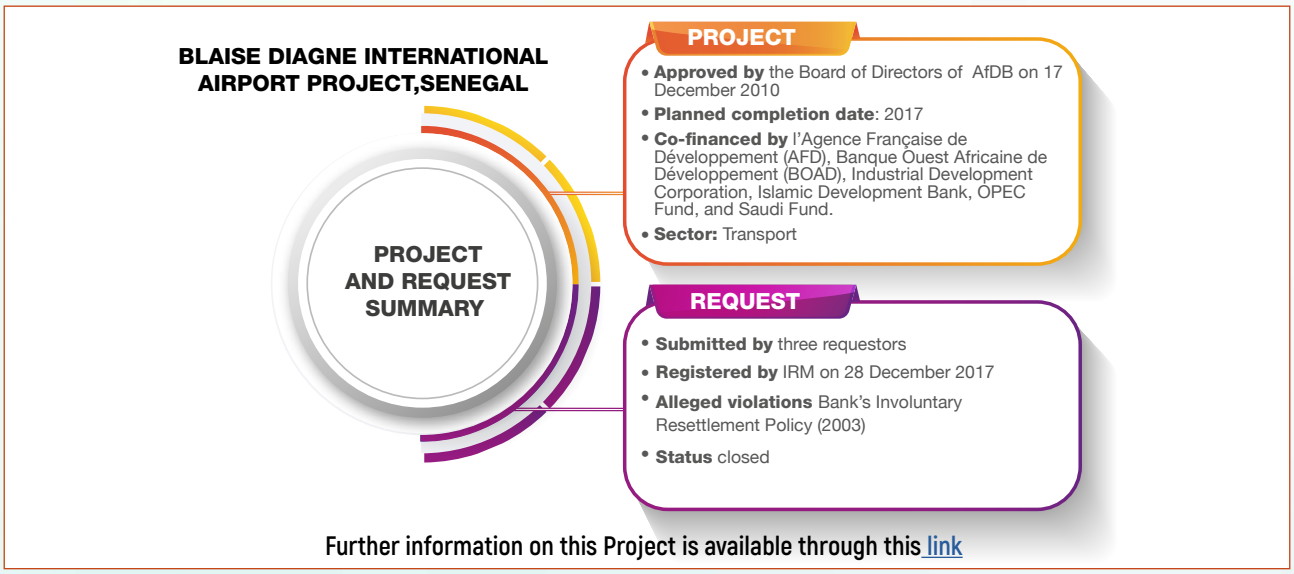
THE SENEGAL - DAKAR-DIAMNIADIO-AIBD REGIONAL EXPRESS TRAIN PROJECT



Further information on this Project is available through this link

1.1.4. STATUS OF MEDIATION IN THE CASE OF BLAISE DIAGNE INTERNATIONAL AIRPORT PROJECT, SENEGAL

Unlike the previous problem-solving cases, no agreement to date has been reached between the parties involved in the case of the Blaise Diagne International (AIBD) Airport Project. Disagreements have persisted between the parties namely, the project promoter, AIBD SA Company, and the three (3) Requestors who were using the lands in the area covered by the Project. The issue at stake was whether or not the Requestors were eligible for a re-evaluation of their compensation based on the revised settlement action plan. Mediation efforts undertaken by IRM through a consultant have not succeeded in ironing out differences between the parties. As a result, the IRM decided to close the case in December 2020 after notifying all the parties concerned.



Further information on this Project is available through this link

1.2. COMPLIANCE REVIEW CASES

In 2020, the IRM planned to monitor implementation of Management Action Plans (MAPs) relating to four compliance review cases in South Africa, Senegal, Mali and Guinea. Some monitoring activities were successfully undertaken during 2020 while the on-site missions for two projects were not able to be conducted due to the COVID-19 pandemic. Despite this, the IRM adopted some contingency measures and was able to obtain information from Bank Management to update the status of implementation of the MAPs relating to these two projects.

The IRM completed two monitoring reports on the status of remedial Management Action Plans (MAPs) for the Medupi Power Project in South Africa and the Sendou Power Project in Senegal. It also obtained information updates from Bank Management on the implementation of MAPs relating to the Moulin Moderne du Mali (M3) Project in Mali and a road project in Guinea Conakry.

Monitoring is the final step in the IRM compliance review process, which starts with the registration of a complaint, followed by an eligibility assessment of the complaint, and a compliance review to determine instances of non-compliance with the relevant AfDB policies and procedures. In response to the recommendations of the IRM Compliance Review Report, Bank Management prepares an Action Plan to address any shortcomings identified by the IRM Report. Once the Boards approve both the IRM Report and Management Action Plan, the IRM monitors the implementation of this Action Plan by Management on an annual basis until it is fully achieved.

The IRM monitoring is based on both desk assessments of Bank supervision reports on the implementation of the Action Plans and IRM field visits where information is collected directly from stakeholders of the project.

1.2.1. SOUTH AFRICA - MEDUPI POWER PROJECT

Monitoring Implementation of the Updated Management Action Plan

In 2020, the IRM completed the Fourth IRM Monitoring Report of the Medupi Project and submitted it to the Boards on 23 June 2020. The findings and recommendations in this Report were discussed and approved by the Boards on 15 July 2020.The Report recommended that the Bank Management should follow-up with the Borrower to ensure the following three pending issues are addressed: (i) The project should continue to comply with the national emission standards, (ii) the borrower should fast-track securing financing for retrofitting the operating units of the project with Flue Gas Desulphurization (FGD) and secure one guarantee for the lenders, (iii) the borrower should ensure that there will be adequate water to operate the last three units of the Medupi Power Plant by the time they are retrofitted with the FGD.

The IRM conducted the fourth monitoring mission of the Medupi Project to South Africa from 23 November to 1 December 2019. The IRM Monitoring Team met with the different stakeholders of this project, including the Requestors and some of the PAPs they represent from Marapong area, relevant government officials and the borrower, and obtained updated information on the progress made in implementing the pending actions contained in the updated Management Action Plan.



Figure 1 A picture of the Medupi Power Plant

SOUTH AFRICA - MEDUPI POWER PROJECT

PROJECT SUMMARY

- **Approved by** AfDB boards on 25 November 2009
- **Sector** Power
- **Status** Ongoing
- **Environmental category** 1

REQUEST SUMMARY

- **Submitted by** two nationals of South Africa in Sept. 2010
- **Registered by** IRM on 7 October 2010
- **Complaints:** Failure of the project to comply with AfDB's environmental and social policies

Further information on this Project is available through this link

1.2.2. THE CONSTRUCTION OF A 125 MW COAL-FIRED POWER PLANT IN THE VILLAGE OF BARGNY MINAM, SENEGAL

Monitoring Implementation of the Revised Management Action Plan

In 2020, the IRM finalized its first Monitoring Report for the Sendou Power Project and submitted it to the Boards for consideration on 23 June 2020. The findings and recommendations in this Report were discussed and approved by the Boards on 15 July 2020. The Report was approved together with an updated Action Plan prepared by Bank Management to address the pending environmental and social concerns posed by the Project.

The IRM Report found that the plant started commercial operations in October 2018, but that it was operating intermittently due to several stoppages arising from technical problems in the turbines, boilers and condensers. The persistent technical difficulties resulted in a total shutdown of the plant in July 2019 and it had not yet resumed operations by the time the Report was discussed by the Board on 15 July 2020. The IRM recommended that Bank Management should develop a Preservation Action Plan to protect Bank assets and mitigate the environmental issues related to ash management, coal storage facility, water drainage systems and the wastewater treatment. These recommendations and others on governance and social issues are covered in the Updated Management Action Plan. According to Bank Management, the implementation of the action plan could only start in 2021 due to the ongoing restructuring of the Project.



Figure 2 A picture of the Sendou Power Plant, Senegal

CONSTRUCTION OF A 125 MW COAL-FIRED POWER PLANT PROJECT

PROJECT SUMMARY

- **Approved by** AfDB Boards on 25 November 2009
- **Sector** Power
- **Status** completed
- **Environmental category** 1

REQUEST SUMMARY

- **Submitted by** two national NGOs (Takko Jerry and LSD) and two Senegalese nationals
- **Registered on** 10 August 2016
- **Complaints:** adverse impacts on the villages of Bargny and Minam because of violations both of national laws and AfDB's environmental and social policies

Further information on this Project is available through this link

1.2.3. THE DIVERSIFICATION OF THE ACTIVITIES OF MOULIN MODERNE DU MALI (M3) PROJECT, MALI

Monitoring Implementation of the Updated Management Action Plan

In 2020, the IRM was unable to conduct a field mission to Mali to monitor the progress made in the implementation of the M3 updated MAP due to travel restrictions arising from COVID-19 pandemic. However, it obtained updated information and relevant supervision reports from Bank Management showing the progress made in the implementation of the Updated MAP and the recommendations contained in the IRM's First Monitoring Report of the M3 Project back in June of 2019. It also received the Environmental and Social Audit Report of the M3 Project from the Bank Management in December 2020 and expects a progress report in early 2021. The IRM will conduct a desk review of the received documents and hold virtual meetings with the Bank project Team and other relevant stakeholders in 2021 and prepare the second monitoring report of the M3 Project for consideration by the Boards.



Figure 3 & 4 Pictures of machinery inside and outside Moulin Moderne du Mali

MOULIN MODERNE DU MALI (M3) PROJECT

PROJECT SUMMARY

- **Approved by** AfDB Board on 17 Septembre 2014
- **Sector** Agriculture and rural development
- **Category** 2
- **Status** completed

REQUEST SUMMARY

- **Submitted by** Afrique-Europe-Interact (AEI), an international NGO in March 2015
- **Registered** on 12 May 2016.
- **Complaints** grabbing of lands, threats to physical security,lack of compensation,etc.

Further information on this Project is available through this link

1.2.4. MULTINATIONAL ROAD DEVELOPMENT AND TRANSPORT FACILITATION PROGRAM WITHIN THE MANO RIVER UNION – GUINEA SECTION, GUINEA

Monitoring Implementation of the Updated Management Action Plan

Due to the travel restrictions arising from COVID-19 pandemic, the IRM was unable to conduct a field mission to Guinea to monitor the implementation of the Management Action Plan approved by the Boards in 2019. In place of a field mission, the IRM conducted a desktop review based on updated information and supervision reports from the Bank Project Team. Unfortunately, this exercise showed that not much progress has been made so far, in implementing the Action Plan. In addition, the IRM learned that disbursement of project funds has now been suspended by the Bank because of the failure by the Government of Guinea to submit financial audit reports as required by the Loan Agreement.

The IRM will continue to monitor the on-going status of this project and will prepare for its first monitoring report of the **Guinea Road Section Project** in 2021 by holding virtual meetings with project stakeholders and members of the Bank's project team.



Figure 5 A picture of a road construction

GUINEA NEW ROAD SECTION PROJECT

PROJECT SUMMARY

- **Approved by** AfDB Board on 18 December 2014
- **Sector** Transport
- **Category** 1
- **Status** On-going

REQUEST SUMMARY

- **Submitted by** two Guinean nationals and a local NGO,
- **Registered** on 23 November 2016.
- **Complaints** adverse impacts on the ecosystem, livelihoods, AfDB's ISS, lack of public consulations, etc.

Further information on this Project is available through this link

1.3. SURVEY OF IRM REGISTER OF REQUESTS (2006 – 2020)

Figure 6 Features of the complaints received (2006- 2020)

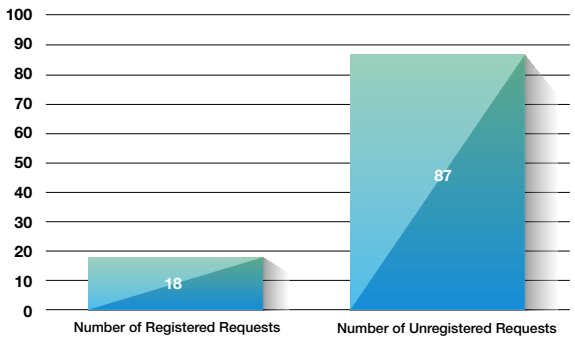


Figure 7 Number of Complaints Registered by request handling

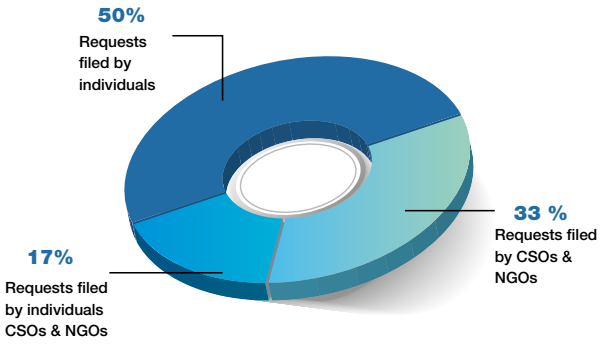


Figure 8 Complainants by category (2006-2020)

Since 2006, a totoal of **105 complaints** were received by the IRM, including **18 eligible for registration and 87 unregistered complaints.**

Out of the 18 registered complaints, **12 complaints** have been handled **through problem-solving** and **6 complaints through compliance review.**

Figure 8 Complainants by Project Sector

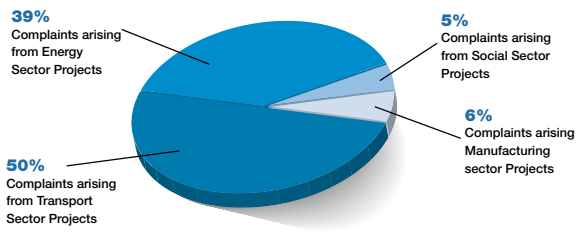
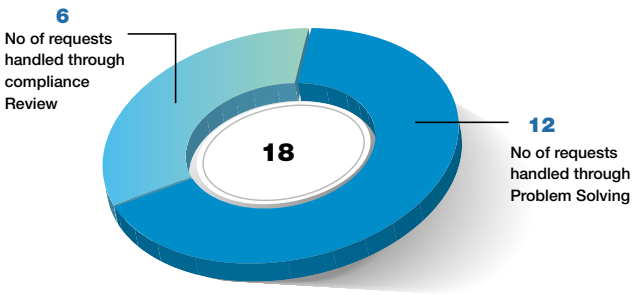


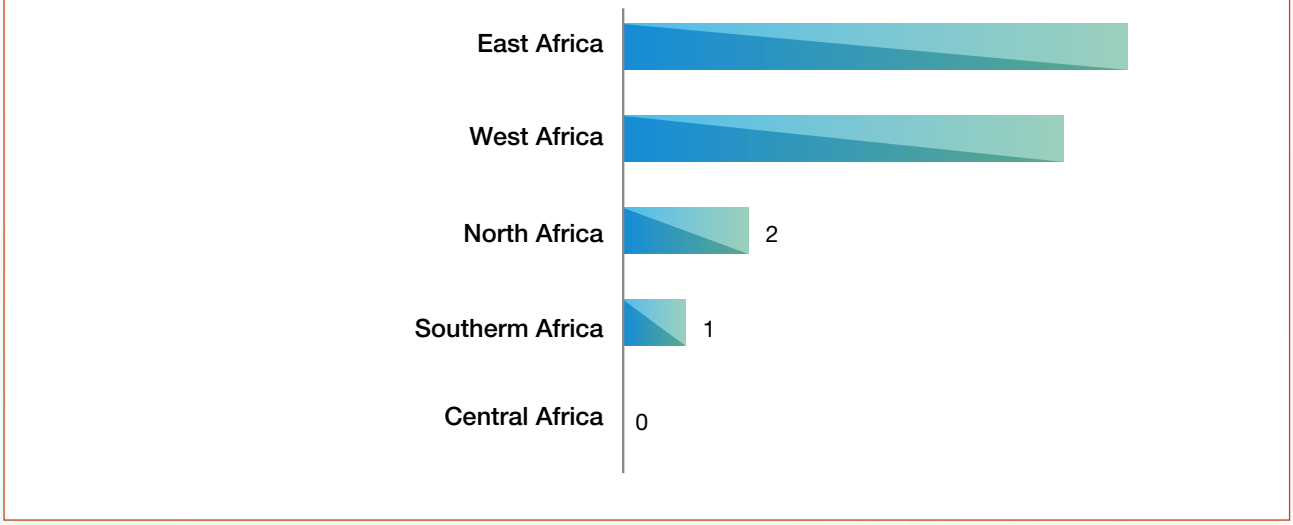
Figure 9 Complainants by category (2006-2020)



Half of the complaints received by the IRM have been filed by individuals and the other half were filed by CSOs, NGOs and individuals.

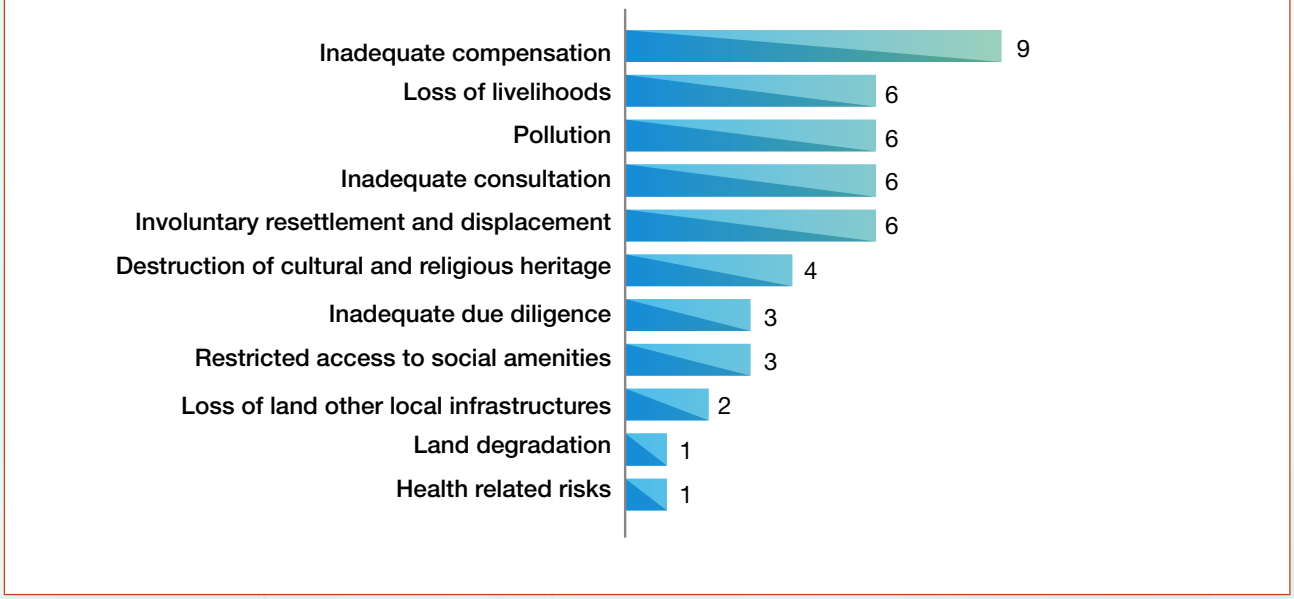
The 18 registered complaints involved four main economic sectors, namely Transportation, Energy, Manufacturing and Social sectors.

Figure 10 Complainants by Region



Most of the complaints received and registered by the IRM have been from projects in East Africa (8 complaints) and West Africa (7 complaints).

Figure 11 Main issues raised by the complainants



The most frequent issues raised in complaints received by the IRM have been related to Inadequate Compensation, Loss of Livelihoods, Pollution, Indequate Consultation and Involuntary Resettlement and Displacement.

2 Advisory Services and Spot-Check Advisory Review of Project Compliance

The objective of the IRM advisory function is to enhance institutional learning and promote a culture of compliance in the Bank. In 2020, the IRM focused its efforts on trying to address its backlog and conducting spot-check reviews of projects approved by the Boards in both 2019 and 2020.



Figure 12 Photo of part of a forest site rehabilitated by the Green Zones Development Project, Phase I, Meru, Kenya

2.1. SPOT-CHECK ADVISORY REVIEW OF PROJECT COMPLIANCE

The spot-check advisory review activities for projects initially approved in 2019 included a spot-check mission to Kenya to investigate two projects. The activities for the spot checks approved in 2020 included a desk review of project documents and writing a draft spot-check report relating to two road projects in Liberia. The IRM expects this spot check for Liberia as well as that for Burkina Faso to be tabled for consideration by the CODE Committee in late 2021, or early 2022 depending on scheduling constraints of both Management and the Board.

2.1.1. Spot-Check Advisory Review for Projects Approved by the Boards in 2019

Due to the unexpected resignation of an Expert from the IRM Roster of Experts in 2019, the IRM was delayed in conducting its spot-check mission to Kenya (originally scheduled for the in Fall of 2019) and had to pivot to make alternative plans with another Expert. This resulted in the spot-check missions for both the Green Zones Development Project (Phase I & Phase II), and the Nairobi Rivers Basin Rehabilitation and Restoration Program Sewerage Improvement Project (Phase I & Phase II) being carried out by another IRM Expert in the first quarter of 2020. The relevant report by IRM was subsequently submitted to the Boards in November 2020 for their consideration.



"The year 2020 marks a turning point in the positive collaboration between the IRM and Bank management. Through constructive and frank discussions, BCRM/IRM did more in clarifying its findings and recommendations, and Bank management did more in reaching consensus and agreement through the submission of realistic and practical action plans. Such mutual collaboration will not only improve the quality of the Bank's portfolio but will lead also towards full compliance with the environment and social safeguards."

SHERIF ARIF
Member of IRM's Roster of Experts

2.1.1.1. IRM Activities in 2020 Concerning the Green Zones Development Support Project–Phase I (GZDSP–I), Project NO.: P-KE-AAD-004

In 2020, the IRM reviewed project documents for the GZDSP–I and GZDSP–II and carried out a mission to Kenya from 29 February to 17 March 2020. The IRM Mission Team visited the project sites located in Nyeri and Meru in Central Kenya. They visited Gathiru Forest Station in Nyeri including some of the community projects supported by the project which included bee keeping, rabbit rearing, soap-making and energy saving cook stove enterprises. They also visited Ruthumbi Forest Station in Meru to investigate project sites related to both GZDSP–I and GZDSP–II that included tree nurseries, rehabilitated forest sites, fish farming and a tea buffer zone in Meru.

The IRM Mission Team also held discussions with the relevant government ministries, the Kenya Forest Service, the Nyayo Tea Zones Development Corporation, and representatives of the project beneficiaries. Based on project documents reviewed and the field mission, the IRM Expert prepared a draft Spot-Check Advisory Review Report on the status of the projects' compliance with the applicable AfDB policies and procedures, particularly their implementation of the Environmental and Social Management Plans (ESMPs).



Figure 13 IRM field mission for the Green Zones Development Project, Nyeri, Kenya

The IRM shared the draft report on the GZDSP I & GZDSP II with the Bank Management for comments in July 2020. Based on these comments, the IRM Expert held informal discussions with the Bank Team responsible for GZDSP I & GZDSP II to clarify the recommendations contained in the report. The IRM Expert then finalized the report and submitted the final report to the Boards of Directors on 11 November 2020 for consideration. The IRM Spot-check Report and Management's Response and Action Plan are scheduled for discussion by the Boards of Directors in the first quarter of 2021.



Figure 14 Photo of seedling production supported by the Green Zones Development Project, Phase II

2.1.1.2. IRM Activities in 2020 on the Nairobi Rivers Basin Rehabilitation and Restoration Program: Sewerage Improvement Project–Phase I (NRBRRP: SIP–I), Project NO. P-KE-EB0-003

In 2020, the IRM reviewed project documents for the NRBRRP: SIP–I and NRBRRP: SIP–II and carried out a mission to Kenya from 29 February to 17 March 2020. The IRM Mission Team visited the project sites in Nairobi, namely, the Dandora Waste-water Treatment Plant and the Kariobangi Wastewater treatment Plant, the Toi Market, and the Mathare- Kitathuru Area.

Discussions were held with the relevant Government ministries; the Athi Water Works Development Agency, (AWWDA); (formerly known as the Athi Water Services Board (AWSB)); the Nairobi City Water and Sewerage Company, (NCWSC); the National Environment Management Authority (NEMA); the Management and Staff of the AfDB; and the local communities in the areas visited by the IRM Mission Team. Based on project documents reviewed and the field mission, the IRM Expert prepared a draft Spot-Check Advisory Review Report on the status of the projects' compliance with the applicable AfDB policies and procedures, particularly their implementation of the ESMPs.



Figure 15 A picture of part of the Dandora Wastewater Treatment Plant, Nairobi, Kenya

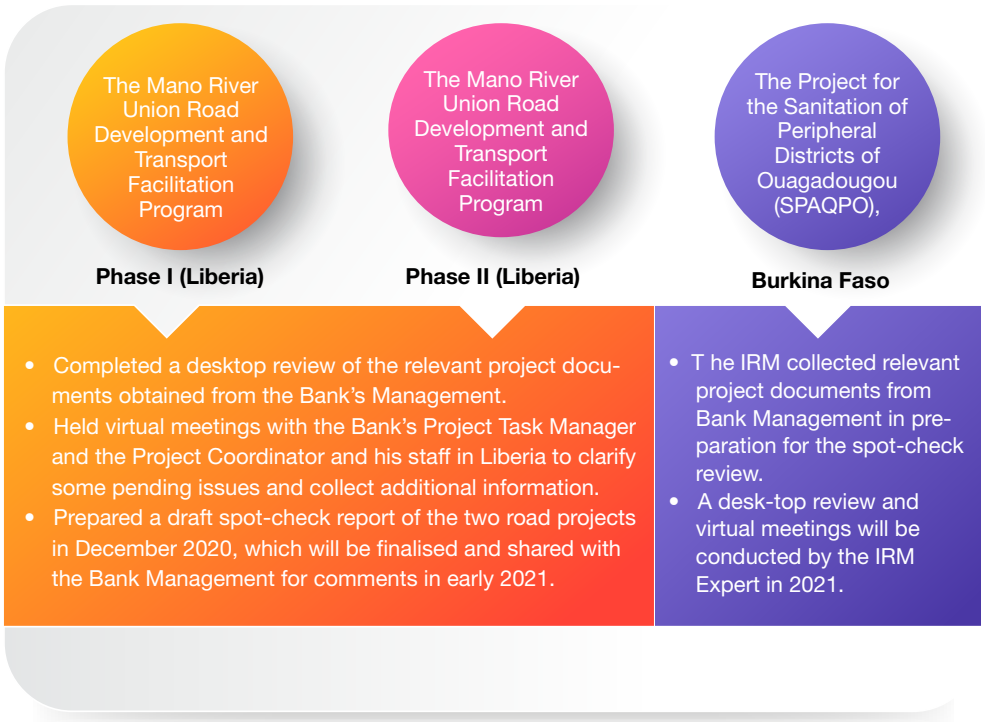
The IRM shared the draft report with the Bank's Management for comments in July 2020. Based on these comments, the IRM Expert held two separate conference calls with the Bank Team responsible for NRBRRP: SIP–I and NRBRRP: SIP–II, to clarify the recommendations contained in the report. The IRM Expert thereafter finalized the report, and the final report was submitted to the Boards of Directors on 11 November 2020. The Boards of Directors will discuss the IRM Spot-check Report and Management's Response and Action Plan in the first quarter of 2021.

2.1.2. Spot-Check Advisory Review of Projects Approved by the Boards in 2020

On 29 January 2020, the Boards of Directors approved the spot-check advisory review of three ongoing high-risk public-sector projects. The selection of these projects by the IRM and the Bank Management was based on the recommendations of the AfDB Auditor General's Reports of March 2019. These projects relate to two road projects in Liberia and a water and sanitation project in Burkina Faso. These projects are:

(i) The Mano River Union Road Development and Transport Facilitation Program: Fish Town-Harper Road Paving Project–Phase I (50 km Harper-Karloken Road Section), Liberia.
(ii) The Mano River Union Road Development and Transport Facilitation Program: Fish Town-Harper Road Paving Project–Phase II (80 km Karloken-Fish Town and 16 km Harper-Cavalla Customs Road Sections; FTHRP), Liberia.
(iii) The Project for the Sanitation of Peripheral Districts of Ouagadougou (SPAQPO), Burkina Faso.

Owing to travel restrictions related to COVID-19, the IRM was unable to complete these assignments in 2020 but did make important progress going forward, as noted below.



3 IRM Policy Review

The IRM's third policy review kicked off in earnest in 2020 and carried out an assessment of the IRM with a view to improving its performance and effectiveness.

From January to February 2020, interviews and consultations were conducted with a wide range of internal and external stakeholders by an independent consulting firm. Stakeholders included Executive Directors of the Bank, Senior Management at AfDB, selected operations' staff, current and former IRM Directors, CRMU Staff, current and former IRM Experts, representatives from other Independent Accountability Mechanisms, as well as relevant international NGOs and African-based CSOs.

Following these consultations, a draft report including preliminary findings and recommendations was prepared. This and discussed by the Boards' Committee on Operations and Development Effectiveness (CODE) on 7 July 2020.

Based on the results from the consultations, together with comments received from CODE members, a revised draft report was published on the Bank's website for 45 calendar days (from 18 September to 2 November 2020) for the first round of public consultations. This marked the first time that the IRM's policy was the subject of a public consultation process.



ALY MARIE SAGNE
President/ LSD, an NGO in Senegal

"Over the past 10 years our organization has supported communities impacted by AfDB projects. It has always been rewarding to see how they reconnect with hope, just because their requests have been taken care of by the IRM.

However, more is needed and that is why, as the current IRM review is coming to a close, I dream of a stronger mechanism, more accessible to African communities and capable of providing the needed redress.»

Following comments made during the first round of public consultations, the Review Team issued a Second Revised Draft Report, which was posted on the Bank's website for a second public consultation. This second consultation lasted for another forty-five (45) days to enable external stakeholders and interested parties to review and make further comments on the Report and proposed amendments to the IRM Rules.

The second public consultation period - which ended on 4th February of 2021, will help to inform a Draft Final Report which will be discussed by CODE. Based on the views and issues raised by CODE members, a Final Report with findings and recommendations, as well as the proposed amendment to the current IRM Rules, will be considered by the Boards of Directors.

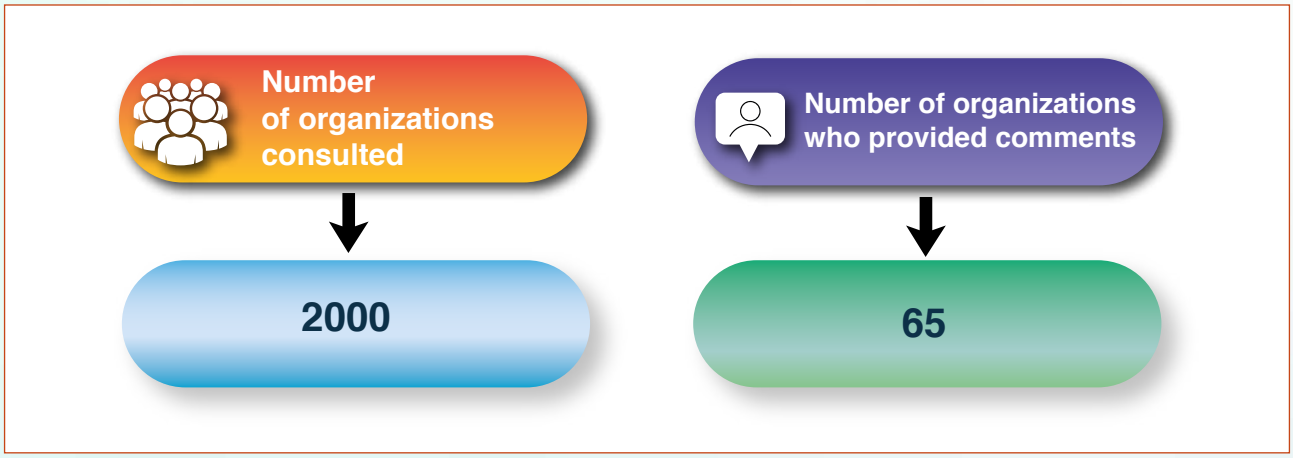
Owing to travel restrictions related to COVID-19, the IRM was unable to complete these assignments in 2020 but did make important progress going forward, as noted below.



STEPHANIE AMOAKO, ESQ.
Senior Policy Associate Accountability Counsel

"The IRM is one of the only avenues African communities have to seek redress for negative environmental and social impacts of AfDB projects. As such, it is crucial that the mechanism is as accessible and effective as possible. Accountability Counsel has appreciated the opportunity to engage in the ongoing review of the IRM's rules and procedures to ensure that it is a community-centered avenue for justice and accountability."

First public consultation of IRM's third policy review in numbers



4 Communications and Outreach Activities

In support of the IRM's mandate, and with the objective to raise awareness of the mechanism among its various stakeholders, the IRM conducted a number of communication and outreach activities aligned to its 2020 Work Program. These activities, which targeted both its internal and external stakeholders, had to adapt to the COVID-19 pandemic by making extensive use of virtual communications' platforms such as Zoom and Microsoft Teams.

4.1. INTERNAL OUTREACH ACTIVITIES

The IRM's internal outreach activities in 2020 have helped raise awareness of the IRM. Most of these activities were conducted virtually. These activities include an Outreach and Training Session for the staff of the Compliance and Safeguards Department, an awareness-raising webinar for Bank staff and IRM staff's participation in other outreach events organized by other departments of the Bank.

Title of outreach event/training	Number of people reached	Topics covered
- Outreach and Training Session for Compliance and Safeguards Division - Awareness-raising webinar for Bank staff	- 27 (Compliance and Safeguards Division) - 140 (Bank-wide staff: departments from the headquarter, regional and country offices, etc.)	- IRM's mandate and functions - Mandate of the IRM and the Role of Bank staff in complaints handling processes

The IRM organized these outreach events virtually due to COVID-19 related restrictions. These online training experiences were largely successful, as evidenced by the results of our post-event assessments. It is noteworthy that the success of these virtual outreach sessions depends on a variety of factors, some of which are often beyond the organizers' control. These include uninterrupted internet and electricity, effective time management which takes into account participants' attention span, management of online communication fatigue, addressing needs for break, taking into account unfamiliarity and discomfort with teleconferencing platforms, and background noise disturbances.

4.2. EXTERNAL OUTREACH ACTIVITIES

IRM's external outreach activities undertaken in 2020 reached over 1000 external stakeholders including CSOs, and PIUs (Project Implementation Units). The external outreach activities conducted included: a webinar to familiarize CSOs on the IRM's mandate and its complaints handling processes[3]; participation in an online training targeting Project Implementation Units[4] in Ethiopia, Kenya, Madagascar, Rwanda, Senegal and Uganda on Environmental and Social Safeguards; and, an induction session at the Civil Society Virtual Forum[5].

3 The webinar was organized on 10 June 2020 in partnership with the Accountability Counsel and the Senegalese NGO, Lumière Synergie Développement.
4 The IRM contributed to the six virtual E&S training sessions organized by the Environmental Safeguards and Compliance Department (SNSC) in Ethiopia, Kenya, Madagascar, Senegal, Rwanda and Uganda.
5 This forum was organized in November 2020 by the Gender, Women and Civil Society Department of AfDB.

Title of outreach event	Number of people reached	Regions covered
- Webinar for CSOs on IRM's mandate and complaints handling	- 75 (Compliance and Safeguards Division)	- West, Central, East and Southern Africa
- Training on Environmental and Social Safeguards	- 551 (Project Implementation Units etc.)	- East Africa, West Africa, Madagascar
- Induction Session of the Civil Society Virtual Forum	- 300 (CSOs and Bank's departments)	- West, Central, East and Southern Africa
- Webinar for CSOs	- 265 (CSOs and Bank's departments)	- West, Central, East and SouthernAfrica

4.3. COMMUNICATIONS

To enhance communication with its stakeholders, the IRM developed new communication tools while continuing to make use of existing channels. The new tools developed in 2020 include a video, an article for the AfDB website and an online complaint form (currently in beta testing).

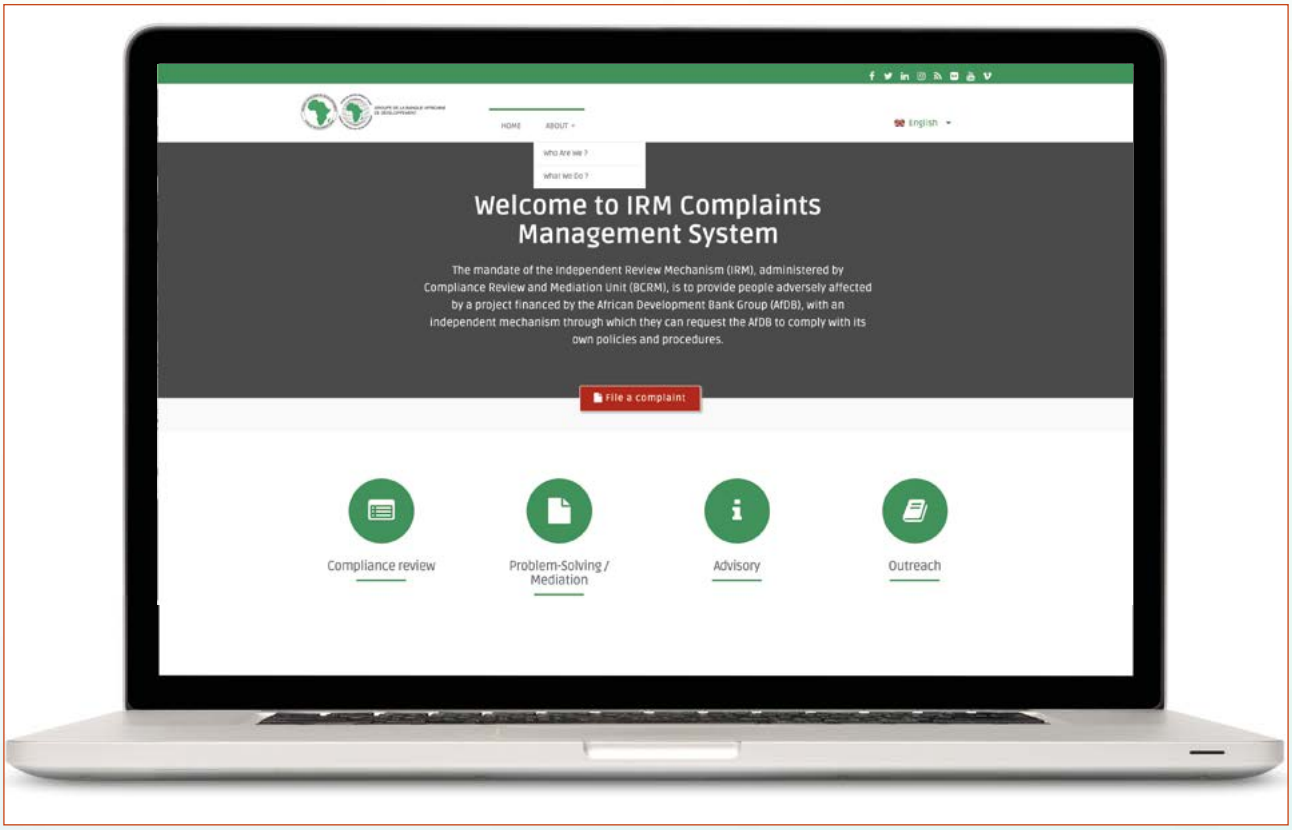
(i) Communications on the IRM



A video on a closed road project in Senegal (Dakar–Diamniadio Road Project) has been produced and disseminated to IRM's major stakeholders. The video which features the successful handling of a problem-solving exercise is available on the Bank's Website.

(ii) Online Complaint Form (Beta version)

The IRM is currently testing an online complaint form for project-affected communities with a view to helping potential complainants to file complaints online. The platform, developed with support from CHIS (the Bank's Information Systems Department), is currently being beta-tested and is accessible online through this link.



5 Trends and Lessons learned

During 2020, the IRM was able to achieve a number of its objectives as well as identify some of the following trends, observations and/or lessons learned, for forward action:

- IRM has demonstrated its capacity to adapt to the new challenges brought about by the COVID-19 pandemic. This year, most of the problem-solving, spot-checks and compliance reviews and outreach activities were undertaken remotely using teleconferencing platforms and on-the-ground resources.

- IRM has accumulated more knowledge and experience conducting joint activities with other IAMs (Independent Accountability Mechanisms) in problem-solving exercises such as in the Mombasa-Mariakani Project (EIB), and The Regional Express Train (French Development Agency). These experiences have helped to demonstrate the importance of collaboration and have additionally, allowed IRM to strengthen its relationships with other IFIs (International Financial Institutions) working in Africa.

- One of the challenges regarding IRM's work this year related to how to handle situations where numerous complaints from PAPs are received on the same project, after an initial complaint is registered. A case in point is the Mombasa-Mariakani Project (EIB).

- Many of the issues covered in the mediation process touch primarily on issues of resettlement and compensation. While it is difficult to identify any statistically significant trends based on such a small data sample, this should nonetheless serve as a red flag for Management to refocus its efforts on these issues to ensure that AfDB-funded projects are in compliance with the safeguard standards associated with resettlement and compensation. Borrowers' inadequate adherence to their loan commitments, especially in case of compensation for affected people and their inconsistent environmental and social management action plans and implementation practices continues to pose a major challenge to projects. The Bank Management should ensure that it has sufficient leverage to influence the borrower/client to implement the environmental and social safeguards (E&S) at any stage of the project. Otherwise, any prolonged non-compliance with E&S safeguards and especially those affecting the people next to the financed project exposes the Bank to reputational risks.

- Improved (more frequent and direct) communication between the IRM and Bank Management which focus more on improving projects through forward looking recommendations. This enables Management to prepare more effective Action Plans that responded appropriately to the issues raised in IRM monitoring reports and spot-check reports.

6 Human Resources and Budget Information

6.1. HUMAN RESOURCES

In 2020 in order to reinforce the capacity of CRMU, three positions were filled as follows:

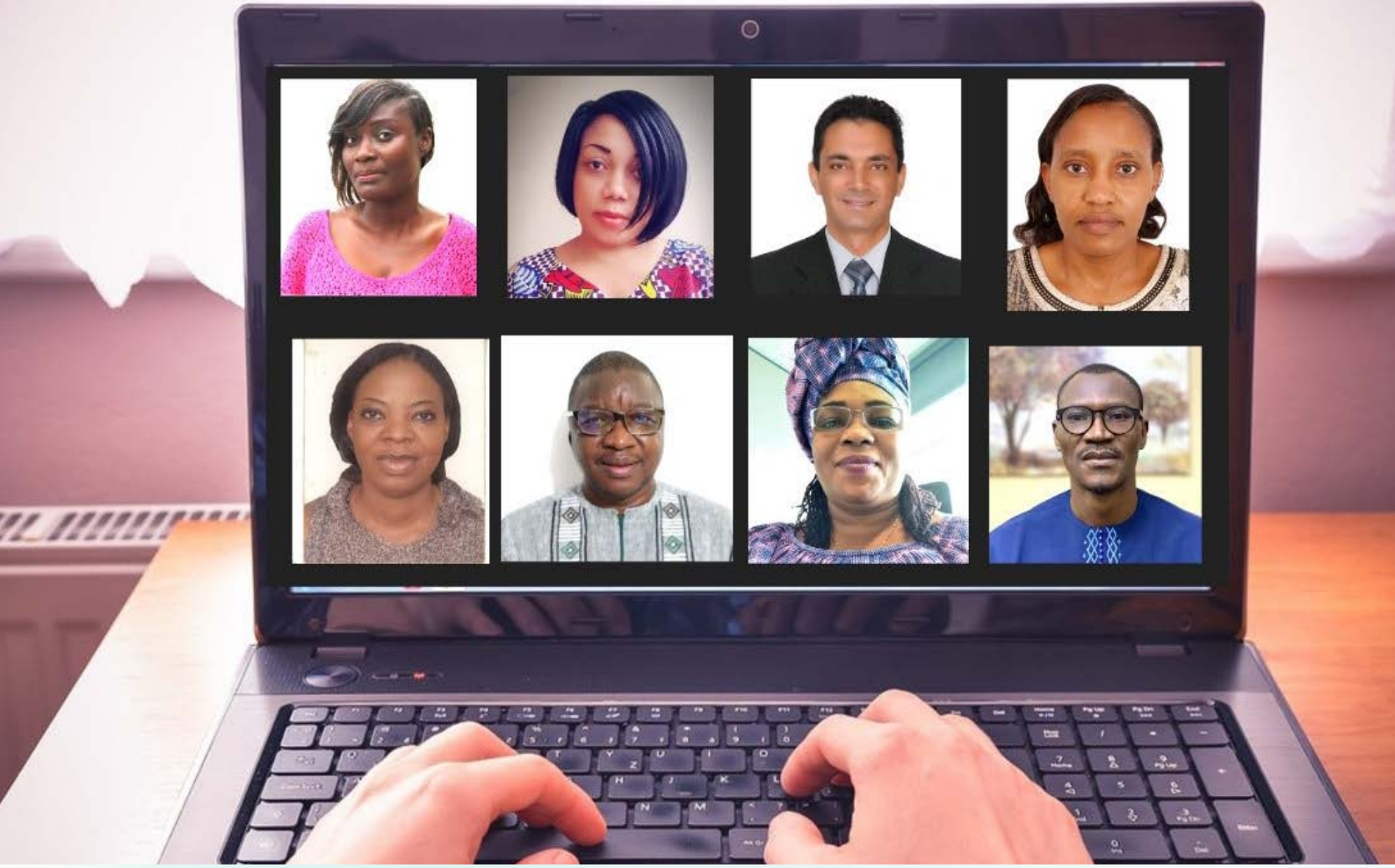
- August 2020 – Senior Communications and Outreach Officer
- September 2020 – Director of CRMU
- November 2020 – Senior Data & Research Officer.

The recruitment of these positions brought a total number of nine staff in CRMU of which one position is at Executive Level (EL), five positions at Professional Level (PL) and three positions at General Support Staff (GS) Level.

6.1.1. CRMU Current staff

One of the most important assets of any organization is the quality of its employees. In the case of IRM/CRMU the expectations of the quality of staff requirement are higher given the nature of the work. While a small team, IRM/CRMU is responsible for ensuring that the mechanism operates effectively and impartially, and that all complaints are dealt with in a responsive and professional manner.

During 2020, the team was able to adapt quickly to the COVID-19 pandemic and enthusiastically embraced the challenges of working in an exclusively online environment. During this period, it organized a number of collaborative sessions with requestors by arranging internet communication connections through local hotels or NGOs. Staff meetings shifted online, as well as weekly "Pomodoro" focus sessions, which encourage staff to "work together, even while they are apart". Throughout this period, the team also focused on promoting both mental and physical health – by making sure that regulars "check-ins" with all staff members took place, organizing on-line gatherings to celebrate successes, and encouraging staff to participate in on-line walking challenges via their mobile phones. A happy and healthy team is a productive team.



Top Row: **Armelle KOKOLA**, (Department Assistant), **Mascet Josiane LOUBAO-GNALI,** (Administrative Assistant), **Hatem Sadok HAJ SALEM,** (Senior Data & Research Officer), **Grace KIMANI,** (Principal Compliance Officer)

Bottom Row: **Bernadette KARGOUGOU**, (Case Management & Advisory Services Officer), **Birima FALL**, (Principal Compliance Officer - Problem-Solving), **Rose Ahouefa SAH**, (Compliance and Outreach Assistant), **Frederic BAMBARA**, (Senior Communications and Outreach Officer). Behind the Computer Screen: **Alan BACARESE** (Ag. Director) **David SIMPSON** (CRMU Director from 09/2020).

6.2. BUDGET INFORMATION

IRM Financial Overview (in UA)

Items*	2020 budget (amounts are in UA)
Complaint Handling Management (missions and experts)	290,957
Outreach and Communications;	73,903
Consultancy (Policy Review, Advisory Notes and Knowledge Products)	131,886
Professional Development (Training, conf, IAM meetings, etc.)	9,646
Administration (HQ Meetings, Translations, etc.)	3,100
AfDB Overhead (Centrally Controlled Budget)	3,738
Total	**513,230**

* This table does not include salaries or benefits for IRM staff members





7. Appendices

No.	Case No.	Date of Registration	Country	Project	Compliance Review	Problem-Solving	Site Visit(s)	Status
1.	RQ 2019/1	19 Aug. 2019	Senegal	Dakar Regional Express Train Project, Phase I		x	x	Problem-solving in Progress
2.	RQ 2018/2	28 Dec. 2018	Côte d'Ivoire	Abidjan Urban Transport Project		x	x	Problem-solving in Progress
3.	RQ 2018/1	26 Dec. 2018	Kenya	Mombasa-Mariakani Road Project		x	x	Problem-solving in Progress
4.	RQ 2017/1	14 Dec. 2017	Senegal	Blaise Diagne International Airport Project		x	x	Problem-solving finalized: complaint closed.
5.	RQ 2016/3	28 Nov. 2016	Guinea	Multinational Road Development and Transport Facilitation Program within the Mano River Union–Guinea Section	x		x	Monitoring implementation of Management Action Plan
6	RQ2016/2	15 June 2016	Senegal	Construction of 125 MW Sendou Coal-Fired Power Plant	x		x	Monitoring implementation of Management Action Plan
7	RQ2016/1	12 May 2016	Mali	Mali- Diversification of the activities of the activities of Modern Mills	x		x	Monitoring implementation of Management Action Plan
8	RQ2015/3 (Bis)	7 October 2015	Kenya	Outer Ring Road Improvement Project		x		Problem-solving finalized: complaint closed.
9	RQ2015/3	9 July 2015	Kenya	The Nairobi River Rehabilitation and Restoration Program: Sewerage Improvement Project		x		finalized: complaint closed.
10	RQ2007/1	7 March 2014	Uganda	Improvement of health service delivery at Mulago Hospital and in the City of Kampala		x	x	Problem-solving finalized: complaint closed.
11	RQ 2012/1	25 June 2012	Tanzania	Road Sector Support Project II		x	x	Monitoring implementation of Settlement Agreement completed: complaint closed.
12	RQ2011/1	25 July 2011	Senegal	Dakar-Diamniadio Highway Project		x	x	Problem-solving monitoring of Agreement complete: complaint closed.
13	RQ2010/2	7 October 2010	South Africa	Medupi Power Project	x		x	Monitoring implementation of Management Action Plan.
14	RQ2010/01	29 July 2010	Morocco	Construction of the Marrakech – Agadir Motorway	x	x	x	Problem-solving monitoring of Agreement completed: complaint closed. Compliance review not conducted because all issues were settled through problem-solving.
15	RQ 2009/02	15 July 2009	Egypt	Nuweiba Combined Cycle Power Project		x	x	Borrower relocated the project to a different site: problem-solving close.
16	RQ 2009/1b	22 July 2009	Ethiopia	Gibe III Hydroelectric Power Project	x			Bank no longer considering financing the project: complaint closed.
17	RQ 2009/1	26 March 2009	Ethiopia	Gibe III Hydroelectric Power Project		x		Borrower withdrew request for financing, problem-solving stopped: complaint closed.
18	RQ2007/1	4 June 2007	Uganda	Bujagali Hydropower Projects	x		x	Monitoring implementation of Management Action Plan completed: complaint closed.

7.2 UNREGISTERED REQUESTS FROM JANUARY TO DECEMBER 2020

No.	Date Received	Country	Project	Issues	Reason for Non-Registration
1	10 Decembre 2020	Senegal	South Agro-Industrial processing zone project (PZTA-SUD) or Agropole Sud	Request for a compliance review of the recruitment procedure on the Agropole Sud project - Social protection specialist position.	The Complaint is outside the mandate of the IRM. Therefore, it was sent to the relevant departments to handle (AHFR & Senegal Country Office).
2	19 October 2020	Sudan	Solar Water Pumps Project in North and West Kordofan States	Complaining about an unfair and un-procedural process of recruitment of the project staff and requesting clarification of the complainant's situation from the hiring committee via the Bank.	The complaint is outside the mandate of the IRM. Therefore, the IRM forwarded to it Director General, of the East Africa Regional Development and Delivery Office (RDGE) & Director for Power Systems Development (PESD) to follow up.
3	0–6 October 2020	Kenya	Multinational - Lake Victoria Maritime Communications and Transport Project	Request to investigate on Fraud for Tender awarding.	The complaint is outside the mandate of the IRM. Therefore, the IRM forwarded it to the Integrity and Anti-Corruption Department (PIAC) to handle.
4	31 August 2020	Uganda	Multinational Busega-Mpigi and Kagitumba-Kayonza-Rusumo Roads project	Complaint over unpaid services rendered and unfair treatment by the project constructor.	The complaint is outside the mandate of the IRM. Therefore, the IRM forwarded it to the Uganda Country Manager on 7 September 2020 to handle.
5	14 August 2020	South Africa	10 MW Biomass Feasibility Study project in the Harding	Complaint for non-compliance of payment of services rendered	The complaint is outside the mandate of the IRM.
6	29 June 2020	Niger	Trans-Sahara Optic Fiber Backbone Project	Follow up of his complaint submitted to IRM in March 2020 for breach and termination of contract of the Complainant as a Project Coordinator.	The complaint is outside the mandate of the IRM and it was forwarded to the department originator of the Project & Country Manager of Niger for action.
7	27 June 2020	Kenya	Last mile under Kenya power	Complaint for non-payment by the project constructor for done work	Complaint is outside the mandate of the IRM. The IRM asked the Complainant to provide additional information so that the IRM could forward the complaint to the relevant department.
8	17 June 2020	Kenya	Nairobi Rivers Basin Rehabilitation and Restoration Program: Sewerage Improvement Project Phase II.	Complaint about Karibangi illegal eviction without resettlement assistance	Complaint falling under the limitation clause for the IRM because the IRM cannot handle matters before national courts. There is a court case pending before the Environment and Land Court in Nairobi, Kenya concerning the same issue of eviction. The IRM advised the Complainants that they can resubmit the compliant once the case has been determined by the court and/ or the case is no longer pending before the court.

No.	Date Received	Country	Project	Issues	Reason for Non-Registration
9	4 June 2020	South Africa	N/A	Request for CSO partnership sponsoring	The complaint is outside the mandate of the IRM and was forwarded to CSO division for follow-up.
10	9 April 2020	Nigeria	N/A	Request for financial support for COVID-19.	The complaint is outside the mandate of the IRM.
11	7 April 2020	Nigeria	N/A	Request for financial support for COVID-19.	The complaint is outside the mandate of the IRM.
12	05 Mar 2020	Niger	Trans-Sahara Optic Fiber Backbone Project	Complaint for breach/ termination of contract of the Complainant as a Project Coordinator.	The complaint is outside the mandate of the IRM and was forwarded to the department originator of the project for follow up.
13	21 Feb 2020	Kenya	Mombasa-Mariakani Road Project	Complaint about notice to vacate New Flats Houses in Changamwe, issued without adequate compensation being paid to the complainant by the landlord.	The complaint did not fulfill the criteria for registration of the Request because it was submitted by one person. The IRM forwarded the compliant to Bank Management to follow-up.
14	21 Feb 2020	Kenya	Mombasa-Mariakani Road Project	Complaint about notice to vacate New Flats Houses in Changamwe issued without adequate compensation being paid to the complainant by the landlord.	Follow up of a complaint submitted earlier to the IRM.
15	21 Feb 2020	Kenya	Mombasa-Mariakani Road Project	Complaint about notice to vacate New Flats Houses in Changamwe issued without adequate compensation being paid to the complainant.	Follow up of a complaint submitted earlier to the IRM.
16	21 Feb 2020	Kenya	Mombasa-Mariakani Road Project	Complaint about notice to vacate New Flats Houses in Changamwe issued without adequate compensation being paid to the complainant by the landlord.	Follow up of a complaint submitted earlier to the IRM.
17	15 Feb 2020	Kenya	Geothermal Development Company's (GDC) - Proposed Geothermal Drilling Project in Menengai West	Complaint about an Environmental and Social Impact Assessment (ESIA) Report for a proposed project which did not comply with the environmental and social safeguards and policies of the Bank.	The complaint is outside the mandate of the IRM because the Bank has not received any request for funding of the project from the Government of Kenya.
18	14 Feb 2020	Kenya	Mombasa-Mariakani Road Project	Complaint about notice to vacate New Flats Houses in Changamwe issued without adequate compensation being paid to the complainant.	Follow up of a complaint submitted earlier to the IRM.
19	14 Feb 2020	Kenya	Mombasa-Mariakani Road Project	Complaint about notice to vacate New Flats Houses in Changamwe issues without adequate compensation being paid to the complainant by the landlord.	The complaint did not fulfill the criteria for registration of the Request because it was submitted by one person. The IRM forwarded the compliant to Bank Management to follow-up.

No.	Date Received	Country	Project	Issues	Reason for Non-Registration
20	13 Feb 2020	Kenya	Co Road Project	Compliant about notice to vacate New Flats Houses in Changamwe issued without adequate compensation being paid to the complainant by the landlord.	The complaint did not fulfill the criteria for registration of the Request because it was submitted by one person. The IRM forwarded the compliant to Bank Management to follow-up.
21	03 Feb 2020	Kenya	Mombasa-Mariakani Road Project	Complaint about notice to vacate New Flats Houses in Changamwe issued without adequate compensation being paid to the Complainant by the landlord.	The complaint did not fulfill the criteria for registration of the Request because it was submitted by one person. The IRM forwarded the compliant to Bank Management to follow-up.
22	06 Jan. 2020	Kenya	Mombasa-Mariakani Road Project	Complaint about notice to vacate New Flats Houses in Changamwe issued without adequate compensation being paid to the complainant by the landlord.	The complaint did not fulfill the criteria for registration of the Request because it was submitted by one person. The IRM forwarded the compliant to Bank Management to follow-up.





IRM
Independent Review Mechanism
MII Mécanisme indépendant d'inspection

The Compliance Review and
Mediation Unit (CRMU)

AFRICAN DEVELOPMENT BANK GROUP
GROUPE DE LA BANQUE AFRICAINE
DE DÉVELOPPEMENT

Immeuble du Centre de commerce
International d'Abidjan (CCIA)
Avenue Jean-Paul II
01 BP 1387 Abidjan 01, Côte d'Ivoire
Tél. (Standard) : +225 2720263900