IRM INDEPENDENT RECOURSE MECHANISM

AFRICAN DEVELOPMENT BANK

Building Capacity in Accountability



2025 ANNUAL REPORT

AFRICAN DEVELOPMENT BANK GROUP

About this Report

The Independent Recourse Mechanism's (IRM's) 2025 Annual Report provides an overview of the year's activities, highlights our progress in delivering the annual work programme, and reflects advances made in implementing the recommendations of the 2021 IRM Policy Review. The Report is directed to the Boards of Directors, the President and colleagues across the African Development Bank Group (AfDB), as well as to our broader community of stakeholders — collaborators, partners, and, most importantly, the individuals and communities affected by AfDB-financed operations who rely on the IRM for fair, independent and effective recourse.

As one of the IRM's key engagement tools, this Report aims to help project-affected people (PAPs) and the organisations that support them to better understand and access IRM services, reinforcing our shared commitment to accountability and sustainable development across Africa.

The preparation of this Report has been guided by the IRM's work programme for 2025 and carried out in accordance with the IRM's Operating Rules and Procedures.

Our Mascot, Msaada

At the close of 2022, we proudly unveiled the adoption of the rare Kihansi spray toad as the official mascot for the Independent Recourse Mechanism (IRM). This decision was more than symbolic; it epitomised our commitment towards biodiversity and championing the concerns of our “less vocal” stakeholders. Our mascot is named ‘Msaada’, which means ‘recourse’ or ‘help’ in Kiswahili.

The Kihansi spray toad, a currently endangered species native to Tanzania, serves as a poignant reminder of the delicate balance between development and environmental preservation. The construction of a hydroelectric power project in 2000 drastically altered its habitat, pushing the species to the brink. Despite the challenges, initiatives such as captive breeding and habitat restoration offer hope for its continued survival.



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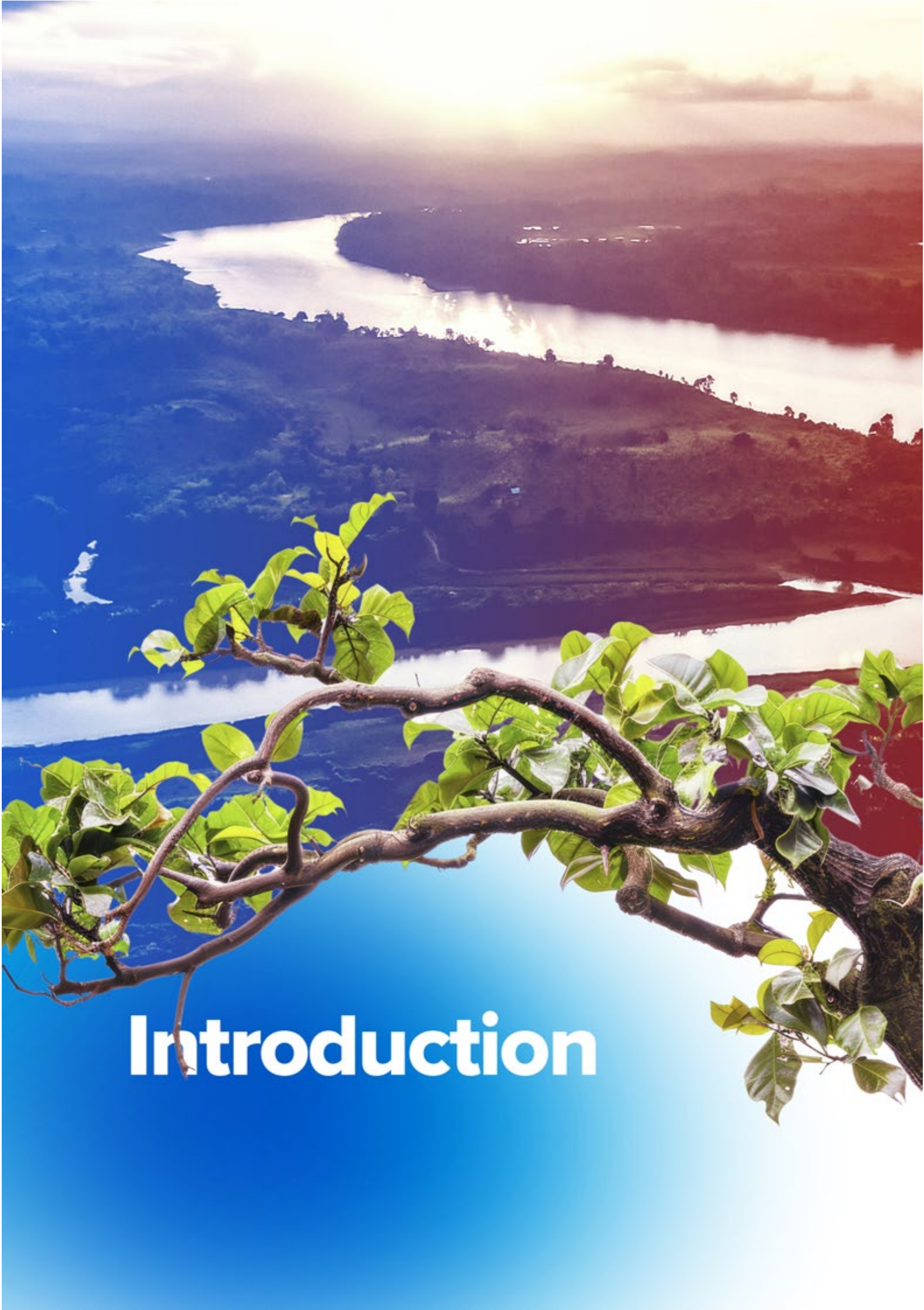
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Abbreviations, Terms and Definitions

ADB	Asian Development Bank
AfDB	African Development Bank Group
ADF	African Development Fund
AHAI	Agriculture & Agro-Industry Department of the African Development Bank
AMG	Accountability Mechanism Group
ARB	Burundi Road Agency
AUTP	Abidjan Urban Transport Project
BADEA	Arab Bank for Economic Development in Africa
Bank Group-financed Operation	Any operation funded by the African Development Bank, African Development Fund, 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 the African Development Fund
CAO	Compliance Advisor Ombudsman (CAO), the Independent Accountability Mechanism of the International Finance Corporation
CDB	Caribbean Development Bank
CODE	Boards' Committee on Operations and Development Effectiveness
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
Compliance Eligibility Assessment Report	Report prepared by IRM to evaluate a Complaint for Compliance Review
Compliance Review Report	Report resulting from a Compliance Review of a Complaint to the IRM
CSO	Civil Society Organisations include, but are not limited to, non-governmental organisations, people's and professional organisations, 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 organisations of Indigenous Peoples
Deferred Complaint	A registered Complaint may be deferred to provide Bank Management and the Complainants the opportunity to work together to resolve issues raised in the Complaint
DEG	German Investment and Development Company
DRS	Dispute Resolution Service of the World Bank Accountability Mechanism
EBRD	European Bank for Reconstruction and Development
EIB	European Investment Bank
FCDO	United Kingdom Foreign, Commonwealth & Development Office
FMO	Dutch Entrepreneurial Development Bank

GCF	Green Climate Fund
GRM	Grievance Redress Mechanism is a locally based, formalised way to accept, assess and resolve community feedback or complaints
IAMs	Independent Accountability Mechanisms
IAMnet	Independent Accountability Mechanisms Network
IFC	International Finance Corporation
IRM	Independent Recourse Mechanism :The independent complaints mechanism of the African Development Bank Group
KFAED	Kuwait Fund for Arab Economic Development
LSD	Lumière Synergie pour le Développement
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
MAPS	Management Action Plan System
MENA	Middle East and Northern Africa
MICI	Independent accountability office of the Inter-American Development Bank Group
NHPC	Nachtigal Hydro Power Company
OECD	Organization for Economic Cooperation and Development
PAPs	Project Affected People
PIU	Project Implementation Unit
Policies and Procedures	Policies and Procedures of relevance to IRM Complaints decided upon in agreement between the IRM and Management, and subject to constant update
Problem-solving Assessment Report	Assessment Report prepared by the IRM upon registration of a Complaint for problem-solving and after receiving the management response to a complaint and conducting internal review of a complaint
Problem-solving Report	Report prepared at the end of a problem-solving exercise
RDGC	Regional Development and Business Delivery Office for Central Africa, AfDB Group
RDGE	Regional Development and Business Delivery Office for Eastern Africa, AfDB Group
RDGW	Regional Development and Business Delivery Office for West Africa, AfDB Group
Register	A web-based tool to record details of complaints received by the IRM which tracks the complaints-handling process
Representative	An individual who, or organisation that has been retained and authorised by a Complainant to represent their interests and make decisions on their behalf with their consent
Reprisal	Any adverse action taken against someone because they made a Complaint disclosure or participated in a Complaint investigation.
SAC	IRM's Stakeholder Advisory Council
SNDR	Delivery, Performance Management and Results department of the AfDB Group
SNSC	Environmental and Social Safeguards and Compliance department of the AfDB Group



Introduction



Message from the **CODE Chair**

Khaled Sherif

The year 2025 was one of consolidation and deepening for the Independent Recourse Mechanism (IRM), marked both by sustained operational activity and by important progress in strengthening its role within the Bank Group's accountability architecture.

The number of complaints registered during the year — six new complaints, bringing the active portfolio to 25 ongoing cases — confirms the IRM's growing visibility among communities affected by Bank-financed operations. This trend is an important qualitative indicator: it demonstrates increased trust in the mechanism and a broader understanding of its role among stakeholders on the ground. As Chairman of the Committee on Operations and Development Effectiveness (CODE), I encourage the IRM to pursue its efforts in raising awareness of the mechanism among communities affected by the Bank Group's development projects.

I was pleased to note that the IRM diligently initiated preparation for the Fourth Review of the IRM in 2025. This review will provide a crucial opportunity to assess the adequacy of the IRM's institutional framework at a time when the Bank's operations are becoming more complex, more decentralized, and increasingly exposed to systemic environmental and social risks.

Capacity strengthening efforts reflect a broader shift toward grievance prevention — an approach that is indispensable to the successful implementation of the Bank's Ten-Year Strategy 2024–2033.

I would also like to highlight the progress made in long-term capacity strengthening of stakeholders in contact with project affected populations, a dimension that is now fully integrated into the IRM's strategic outlook. These efforts reflect a broader shift toward grievance prevention, which is essential to the successful delivery of the Bank's Ten-Year Strategy 2024–2033.

The IRM also advanced its mediation and compliance work, including moving forward several compliance reviews and monitoring the implementation of successful mediation agreements. Its partnerships with other accountability mechanisms — continued to strengthen the coherence and credibility of the global accountability ecosystem.

These achievements are all the more noteworthy given the significant pressure on the Mechanism's human resources. I wish to commend the dedication, resilience, and professionalism of the IRM team, who have maintained high standards despite increased workload and reduced staffing. CODE will continue to monitor the question of resourcing closely, as the IRM's growing caseload requires sustained structural support.

The IRM remains a vital pillar in ensuring that the Bank's operations uphold the highest environmental and social standards. Through its analyses, recommendations, mediation activities, and capacity-building initiatives, it not only helps resolve individual cases but also contributes to lasting institutional improvements.

On behalf of CODE, I reaffirm our commitment to supporting the IRM in carrying out its mandate, to promoting greater visibility and accessibility for communities, and to ensuring that it has the resources it needs to fulfil its mission.



Message from the **IRM Acting Director**

Mariam Diawara

I am pleased to present the Independent Recourse Mechanism's 2025 Annual Report, guided by this year's theme: "Building Capacity in Accountability".

In 2025, the IRM's work demonstrated that accountability is not only about resolving complaints, but also about strengthening the ability of all actors to engage constructively, prevent harm, and deliver better development outcomes. Building capacity in accountability means ensuring that communities understand their rights and how to raise concerns; that borrowers and project teams anticipate and manage environmental and social risks effectively; and that institutions learn systematically from challenges. Throughout the year, the IRM strengthened the capacities of key stakeholders across the accountability ecosystem — communities, civil society, Project Implementation Units (PIUs), and Bank staff.

The 25 active cases managed in 2025 reveal recurring themes across sectors and regions: land acquisition and compensation delays, livelihood restoration gaps, labor and occupational safety concerns, environmental impacts, and shortcomings in stakeholder consultation. These issues — raised in transport projects in Côte d'Ivoire, Kenya and Senegal, irrigation schemes in Uganda, energy operations in Egypt, and infrastructure projects elsewhere — underscore that development at scale requires strong local engagement, clear communication, and disciplined implementation of safeguards.

Accountability is not only about resolving complaints, but also about strengthening the ability of all actors to engage constructively, prevent harm, and deliver better development outcomes.

Through compliance reviews, the IRM strengthened institutional capacity by identifying gaps in consultation processes, resettlement implementation, labor oversight, and environmental risk management. Through problem-solving and mediation — including continued monitoring of agreements in Cameroon and Senegal — the IRM supported communities and project authorities in building dialogue skills, clarifying expectations, and jointly implementing solutions.

A key lesson emerging from 2025 is that accountability must be operationalized. Board-approved Management Action Plans are effective only when borrower commitment, supervision, and sustained monitoring are ensured. During the year, the IRM followed up on the implementation of corrective measures under the Dakar Regional Express Train in Senegal, reviewing progress on compensation, livelihood restoration, and environmental commitments to help ensure that agreed actions translated into tangible improvements. In Kenya, the IRM advanced accountability through both compliance review and problem-solving. For the Isebania–Kisii–Ahero Road Project, the IRM conducted a compliance review examining allegations of delayed compensation payments, inadequate consultation with project-affected people, and related concerns, with a view to assessing whether corrective measures were required to address harm and strengthen compliance. In parallel, under the Mombasa–Mtwapa–Kwa Kadzengo–Kilifi Road Project, the IRM facilitated structured dialogue between complainants' representatives and the Project Implementation Unit, supporting efforts to reach practical solutions on compensation delays, consultation gaps, disclosure of project information, and environmental impacts.

Beyond case handling, the IRM invested significantly in outreach and capacity-building to strengthen accountability across the Bank's ecosystem. In 2025, the IRM supported mediation training for 15 professional mediators in the MENA region and strengthened the capacity of 25 civil society representatives in Eastern, Central, and Southern Africa to engage effectively in dispute resolution processes. Training sessions were also delivered to Project Implementation Units across thirteen African countries, enhancing their understanding of the IRM's mandate and environmental and social standards. In line with guidance from CODE, the IRM further expanded accessible communication tools, including materials in languages spoken by project-affected communities, to reduce barriers to recourse. These initiatives contribute to preventing disputes, improving early resolution of grievances, and reinforcing accountability as a shared and proactive responsibility.

In 2025, we also initiated preparations for the Fourth Review of the IRM, a pivotal opportunity to assess how effectively the Mechanism is positioned to respond to the evolving needs of our stakeholders and the increasing complexity of the Bank's operations. This independent review will examine our governance framework, rules and procedures, resourcing, and overall performance, guided by one central question: how can the IRM become more accessible, efficient, and impactful?

To further strengthen our operational readiness and timely access to specialized expertise, the IRM also relaunched the recruitment process to establish its Roster of Technical Experts and Consultants, which will become operational in 2026.

These achievements are particularly noteworthy given the high operational demand and limited human resources the IRM faced during the year. I would like to express my sincere appreciation to the IRM team, whose professionalism, resilience and commitment have enabled the Mechanism to fulfil its mandate to the highest standards. I also extend my gratitude to CODE members, the CODE Chair, and the President of the Bank Group for their continued support and confidence.

As we look ahead, the IRM remains steadfast in its mission: to provide fair, independent, and effective recourse to project-affected people while strengthening the capacity of all actors — within the Bank and beyond — to uphold accountability as a cornerstone of sustainable development. In doing so, the IRM contributes directly to the Bank's Four Cardinal Points for institutional reform and delivery discipline by helping to ensure that development is inclusive, collaborative, and results oriented.

I hope you find this report both insightful and forward-looking, and I warmly welcome your reflections and feedback.

About the Independent Recourse Mechanism

The Independent Recourse Mechanism (IRM) is the independent accountability instrument of the African Development Bank Group (AfDB), a multilateral development institution that provides financing to its 54 regional member countries of Africa.

The overarching goal of the IRM is to enhance the accountability and sustainability of projects financed by the AfDB. In practice, this means we provide fair, independent and effective recourse, to individuals, workers and communities – referred to as project-affected people (PAPs) – who believe they are or are likely to be negatively impacted by an AfDB-financed operations. We employ a formal complaints-handling process with the aim of addressing, resolving and, where appropriate, recommending compensation for harm caused. Complaints undergo either compliance review, which investigates claims of non-compliance by the AfDB with its policies, and the occurrence of harm related to an AfDB-funded project or operation or problem-solving, which aims to resolve complaints through mediated dialogue between complainants and relevant project stakeholders to find solutions to the issues raised in the complaint. The path taken for each complaint is decided through consultation between the IRM and the complainants.

The IRM also plays an advisory role. Leveraging practical examples where the IRM was instrumental in 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 root causes of complaints, reduce potential harms caused by projects, and help to ensure an inclusive approach to sustainable development.



Mission, Vision, Values

Vision

Provide a safe and trusted space for affected people to bring forward their concerns about Bank Group-financed operations 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 to improve projects, raise standards, minimise disputes and enhance sustainable development outcomes for all.

Mission

Provide fair, independent and effective recourse and remedy for individuals, workers and communities who are adversely impacted by AfDB-funded operations, and to identify potential areas via the complaints-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”.

Our Core Values



Independence and Impartiality
We will be independent, evidence-based and impartial in all 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 possible barriers so we are inclusive to all – especially the 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.



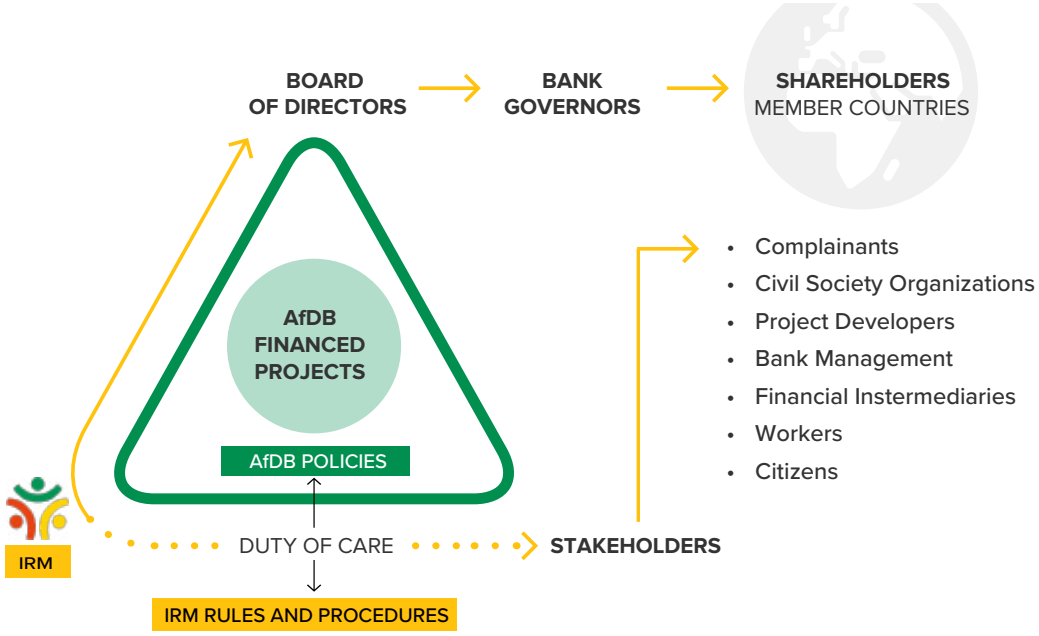
Diligence and Professionalism
We commit to providing timely, high-quality work based on robust professional standards, effective dialogue with our stakeholders and well-defined (predictable) processes that focus on continuous improvement and making a difference.

Governance

The IRM is an independent unit of the African Development Bank Group. All decisions relating to the admissibility, assessment, and resolution of complaints are made independently of the Bank's operational functions.

The IRM reports to the AfDB Boards of Directors through the Boards' Committee on Operational and Development Effectiveness (CODE). The Boards of Directors, in turn, report to the Board of Governors, which is the Bank's highest decision-making body and brings together the governments of the AfDB's member countries. The IRM Director is selected through a multi-stakeholder process. The IRM Director reports functionally to the AfDB Boards of Directors through CODE, and administratively to the President of the Bank Group. The CODE supervises and advises the Boards on the adequacy of the IRM and guides the IRM policy review process. It also endorses the IRM annual work programme and budget for approval by the Boards, and oversees performance of the IRM against the objectives set.

During 2025, the IRM interacted extensively with CODE members. Beyond case handling, the IRM also submitted the 2024 IRM Annual Report, the IRM Capacity Building document, the IRM Work Program 2026, the Concept Note and the Terms of Reference for a consultancy firm to conduct the 4th Review of the IRM, for adoption by CODE and consideration by the Boards of Directors.



Increasing Accessibility, Efficiency and Predictability

The IRM's Operating Rules and Procedures establish the way we work and engage with our stakeholders. In 2021, the Bank's Boards of Directors approved recommendations stemming from the 2021 IRM Policy Review. The 33 recommendations were aimed at increasing the accessibility, efficiency, predictability and transparency of the Bank's complaints-handling process.

At the close of 2025, 32 out of 33 recommendations had been implemented. The remaining recommendation is pending action by the Bank's management to designate a focal point to act as liaison for between management and IRM and ensure timely and efficient production of management's responses to IRM requests.

2025 in Numbers



209

complaints received since the IRM became operational in 2006, of which the IRM has registered 46. As complaints related to the same project were consolidated into one, the total number of registered complaints stands at 43:
16 problem-solving complaints,
15 compliance-review complaints,
6 deferred complaints,
1 closed after management response and
5 unassigned as of 31 December 2025.



19

complaints registered in the last three years, representing 41.3% of the total complaints registered in 18 years since IRM's inception in mid-2006.



1.35

complaints registered by the IRM **for every 100 projects** approved, up from 1.1 in 2024.



362

average number of business days to complete compliance review complaints.



1514

stakeholders reached in 32 African countries by IRM through its in-person and online outreach events.



510

average number of business days to complete a problem-solving complaint.

IRM Strategy

The IRM's Vision and Mission – which hold accountability at their core – are underpinned by our 2021–2025 Strategic Plan. The Plan's objectives and supporting strategies align with the 10 core topics that our stakeholders identified as most material to our collective interests. Our key performance Indicators (KPIs) help to ensure that we remain aligned with our strategies and make progress towards our objectives.

Objectives	Core Strategies
To provide complainants with a recourse mechanism that is recognised as being informative, predictable and fair, and is trusted by all 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 complaints-handling processes. • Clearly communicate to all stakeholders the outcomes of our complaints-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 management to address stakeholder complaints to achieve better outcomes. • Provide relevant recommendations and advice to help improve the Bank's practices. • Analyse data gathered from complaints to identify trends and potential areas of concern.
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 the IRM. • Support individuals to submit complaints - providing them with access to necessary resources. • Improve the knowledge of Bank staff about their obligations in making stakeholders aware of IRM. • Monitor the effective application of the Bank's Disclosure and Access to Information Policy. • Ensure the complaints process is culturally appropriate, gender-responsive and equally accessible to all. • Establish partnerships with relevant groups (NGOs, business groups, associations, trade unions, etc.).
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 and pay attention to the users' perspectives.

KPIs

- Complaint processing times (targets)
- IRM recommendations accepted by Boards and Management
- Effectiveness measures of knowledge products and learning events
- Growth in IRM's digital footprint/online presence
- Monitoring results of AfDB's efforts to highlight the IRM at project level
- Number of complaints submitted to office (# per approved projects)
- Number of "strategic" connections with CSO groups and other key stakeholders
- IRM accessibility initiatives (i.e., info available in multiple languages, etc.)
- Recommendations implemented (%) according to the Inter-Departmental Working Group (IDWG) action plan
- Stakeholder Advisory Council in place



Our Performance in 2025

Complaints Handling

The IRM received 29 new complaints in 2025.

9 of these complaints were eligible for registration. Since the complaints relating to the same project were consolidated into one, the total number of complaints registered in 2025 stood at 6 as follows: 3 complaints from Tunisia registered as 1 complaint and 2 complaints from Senegal registered as 1 complaint and 4 complaints, from the following countries: Uganda, Djibouti, Côte d'Ivoire, and Lesotho.

The status of the 6 new registered complaints as of 31 December 2025 was: the Djibouti case was registered and closed after receiving management response to the complaint, the Senegal case is to be handled through a compliance review process and the four others were under review to determine the complaints-handling function.

19 complaints were not registered because they were outside the mandate of the IRM. Most issues raised in the unregistered complaints related to procurement, fraud and corruption.

1 complaint was pending registration because the IRM was waiting to receive additional information from the complainants.

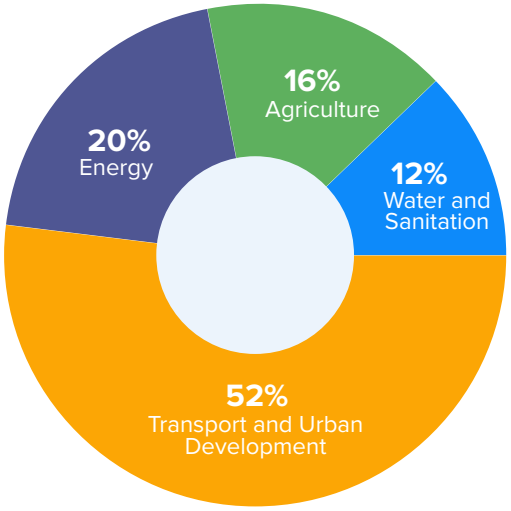
19 In addition, the IRM continued to handle nineteen ongoing cases carried over from previous years.

12 being handled through compliance review, of which 4 in investigation stage and 8 in monitoring stage.
4 being handled through problem-solving, and all in the monitoring stage.
2 being handled through temporary suspension.
1 under review at year end for decision-making.

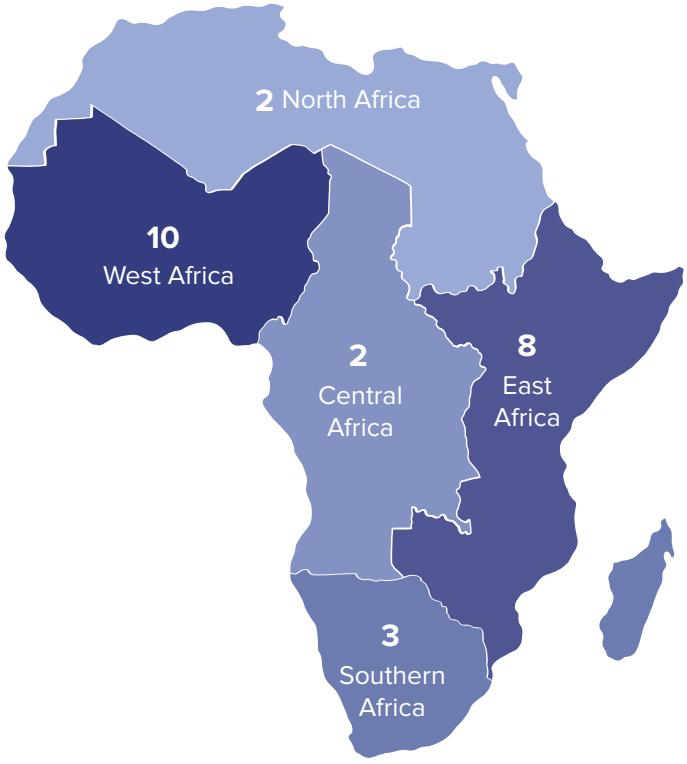
2025 Active Complaints

Based on the breakdown of complaints, the total number of active complaints in 2025 therefore added up to 25.

2025 ACTIVE COMPLAINTS BY SECTOR



2025 ACTIVE COMPLAINTS BY REGION



COMPLAINTS HANDLING BY FUNCTION AS OF 31 DECEMBER 2025

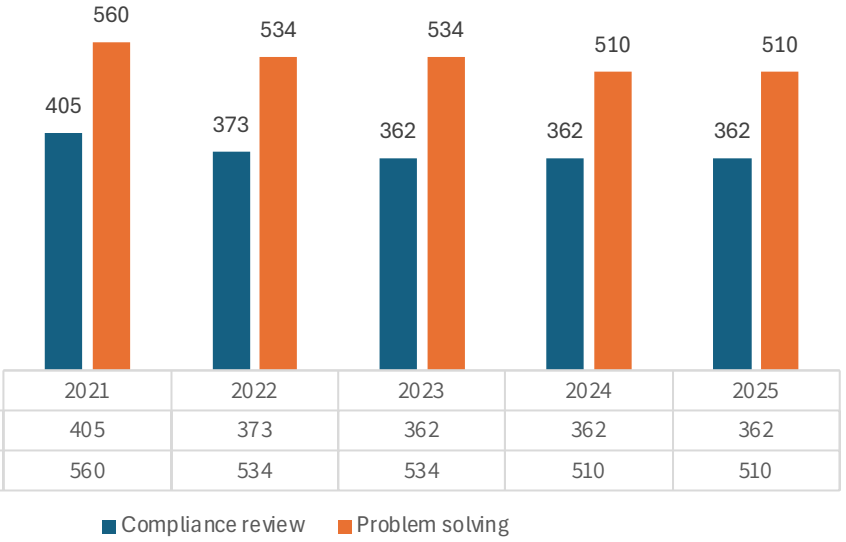


* Case closed after reception of Management Response

Complaint-Handling Times

In 2025, the average number of business days to complete a complaint handled through problem-solving remained stable at **510**. Similarly, the average number of business days to complete a complaint handled through a compliance review remained steady at **362**.

AVERAGE DAYS TO HANDLE COMPLAINTS (2021-2025)



	2021	2022	2023	2024	2025
Compliance review	405	373	362	362	362
Problem solving	560	534	534	510	510

How the IRM Handles Complaints: An Overview

Receiving and handling a complaint is the core of the IRM's mandate. The IRM may receive a complaint from individuals, communities or workers who consider themselves negatively affected by a project funded by the AfDB. Once a complaint is received and registered, the IRM has two possible processes, or paths, to handle it: Compliance Review and/or Problem-solving.

The path taken for each complaint is decided upon through consultation between the IRM and the complainant(s).

> **For more information, please visit irm.afdb.org**

Compliance Review

What does it do?

The compliance review process investigates claims of policy non-compliance, and the occurrence of harm related to an AfDB-funded project.

How does it do that?

The IRM examines the validity of the complainants' assertion that the Bank Group-financed Operation has harmed, or could harm them, due to the Bank's noncompliance with AfDB policies and procedures.

Then what?

If the IRM finds that the Bank is not in compliance with its own policies and procedures and that this non-compliance can be linked to harm or potential harm to the project-affected people, then it will recommend ways to ensure that the harm caused or the potential harm is effectively addressed by the borrower or the client.

Problem-Solving

What does it do?

The problem-solving process aims to reach an agreement between the complainants and the organisation in charge of the project's execution.

How does it do that?

The process addresses the issues raised in the complaint by engaging the complainant(s) and the project implementation unit or the promoter in a facilitated or mediated process. In the problem-solving process, the IRM acts as an impartial third party providing support and guidance.

Then what?

If the parties reach agreement on the issues discussed, the IRM will monitor the implementation of the agreement and disclose its outcomes with the consent of the parties. If at the end of the problem-solving exercise, parties do not reach agreement on the issues discussed, the IRM Director can either refer the case to the compliance review process or make recommendations on the steps the Bank should take to deal with the unresolved issues.

Case Index in 2025

COMPLIANCE REVIEW

CASE #	CASE NAME	COUNTRY	PHASE
RQ2025/04	Dakar-Tivaouane-Saint Louis Highway Construction Project	Senegal	External expert recruited. Eligibility mission scheduled for early 2026
RQ2024/02	Sirari Corridor Accessibility and Road Safety Improvement Project: Isebania-Kisii-Ahero (A1) Road Rehabilitation	Kenya	Compliance review
RQ2023/01	Abidjan 4th Bridge-Abidjan Urban Transport Project (AUTP)	Côte d'Ivoire	Compliance review
RQ2022/04	Photovoltaic Solar Power Projects in Egypt under the Feed-in-Tariff (FiT) Program	Egypt	Compliance review
RQ2022/02	Lomé–Cotonou Road Rehabilitation-Phase 2 and Coastal Protection Project	Togo	Compliance review
RQ2021/04	Multinational Lakes Edward and Albert Integrated Fisheries and Water Resources Management (Leaf II) Project	Uganda	Monitoring
RQ2021/03	Wadelai Irrigation Scheme Project under the Farm Income Enhancement and Forestry Conservation Project – Phase 2 (FIEFOC-2)	Uganda	Monitoring
RQ2019/01	Dakar Regional Express Train, Phase 1: Dakar–Diamniadio Section	Senegal	Monitoring
RQ2018/01	Mombasa-Mariakani Highway Project	Kenya	Monitoring
RQ2016/03	Multinational Road Development and Transport Facilitation Program within the Mano River Union (Guinea Section)	Guinea-Conakry	Monitoring
RQ2016/02	Construction of a 125 MW Sendou Coal Power Plant in the village of Bargny Minam	Senegal	Monitoring
RQ2016/01	The Diversification of the Activities of the Modern Mills Project in Mali (M3)	Mali	Monitoring
RQ2010/02	Medupi Power Project	South Africa	Monitoring

PROBLEM-SOLVING

CASE #	CASE NAME	COUNTRY	PHASE
RQ2023/02	The Mombasa–Mtwapa–Kwa Kadzengo–Kilifi Dualling (A7) Road under the Multinational Bagamoyo–Horohoro/Lunga Lunga–Malindi Road Project, Phase I (Transport)	Kenya	Closed
RQ2022/03	The Nachtigal Hydro Power Project	Cameroon	Monitoring
RQ2022/01	The Malicounda 120 MW Dual-Fuel Project	Senegal	Monitoring
RQ2021/01	The Nyakararo–Mwaro–Gitega Road (RN18) Upgrade and Asphalting Project/Phase II – Kibumbu–Gitega (Mweya)	Burundi	Monitoring

TEMPORARY SUSPENSION

CASE #	CASE NAME	COUNTRY	PHASE
RQ2024/05	Transport Sector Support Program Phase 1: Development of the Batchenga-Ntui-Yoko-Lena Road	Cameroon	Ongoing
RQ2024/04	The Lower Mangoky Irrigated Area Rehabilitation and Extension Project Phase II (PRBM II)	Madagascar	Ongoing

UNDER REVIEW TO DETERMINE THE COMPLAINT-HANDLING FUNCTION

CASE #	CASE NAME	COUNTRY	PHASE
RQ2024/06	Cote d'Ivoire Development of the Y4 Ring Highway under the Abidjan Urban Transport Project (AUTP) - PK8	Côte d'Ivoire	Under review
RQ2025/01	Kapchorwa-Suam-Kitale and Eldoret Bypass Roads Project	Uganda	Under review
RQ2025/03	Cote d'Ivoire _Abidjan Urban Transport (AUTP): Development of the Y4 Ring Highway (Riviera Palmeraie- Saint Viateur)	Côte d'Ivoire	Under review
RQ2025/05	Wastewater Treatment Plants (WWTPs) under Tunisia's Small Cities (less than 10,000 inhabitants) Sanitation Programme - Phase I (PAPC-I)	Tunisia	Under review
RQ2025/06	Lesotho Highlands Water Project (LHWP) Phase II	Lesotho	Under review

CLOSED AFTER RECEIVING MANAGEMENT RESPONSE

CASE #	CASE NAME	COUNTRY	PHASE
RQ2025/02	Youth Entrepreneurship for Climate Change Adaptation Project	Djibouti	Closed

Compliance Review Cases

13 In 2025, the IRM handled thirteen compliance review cases in Côte d'Ivoire, Egypt, Guinea, Kenya, Mali, South Africa, Senegal, Togo, and Uganda.

What Happens when a Complaint is Submitted?

Complaint Registered:
The IRM receives the complaint, makes sure it meets the complaints' criteria for registration and, if it does, officially registers it. The compliance review process then follows the steps below.

Eligibility Assessment:
An eligibility assessment is done to evaluate if there is prima facie evidence of harm and, if so, whether it can plausibly be linked to the Bank's non-compliance with its policies.

Planning and Expertise Selection:
If the complaint is eligible, it moves to the investigation planning stage. At this stage, the IRM develops investigations tools specific to the complaint and brings in subject-matter expertise where appropriate.

Independent Investigation:
Once planning is complete, the formal investigation into the complaint begins. This will assess if the AfDB has failed to comply with relevant policies and procedures and if any harm has occurred, or is likely to occur, as a result. The investigation concludes with a draft report that presents the IRM's findings and recommendations, and this report is shared with Bank Management and the complainants for comments.

Final Report:
The IRM considers the comments it receives and issues a final report and recommendations.

AfDB Action Plan:
Bank Management reviews the recommendations in the IRM report and develops an action plan to address identified issues.

Boards' Decision:
The IRM's Report and Management's Action Plan (MAP) are presented to the Boards of Directors, who approve the IRM recommendations and MAP, if pertinent.

Monitoring of Action:
The IRM monitors the implementation of the approved action plan until it is completed.



Dakar-Tivaouane-Saint Louis Highway Construction Project, Senegal

Sector(s)	Transport
Location / Reference Number	Senegal / RQ2025/04
Complaint	Inadequate compensation and lack of compensation, as well as an inappropriate resettlement site
Complainants	Group of land owners in Saint Louis affected by the project
Status / Phase	Eligibility Assessment for Compliance Review

Complaint: The Complaint was submitted to the IRM on 7 January 2025 by a Senegalese citizen, on behalf of a Group of 997 owners of bare residential plots of land in Saint Louis affected by the Project. The complaint concerns a lack of and inadequate compensation, and inappropriate resettlement. On 12 March 2025, the IRM received a second complaint concerning the same project.

- **Jan. 2025** First complaint submitted to the IRM
- **Mar. 2025** Second complaint filed with the IRM
- **Apr. 2025** Initial deadline established for Management's response to the first complaint
- **May 2025** Extension granted for Management's response following the submission of the second complaint
- **May 2025** Management Response transmitted to the IRM

Projet: The Project aims to enhance connectivity, accessibility, road safety, and living conditions in the target area while supporting economic growth, tourism, and oil and gas development. It includes the construction of the 194 kilometers Highway from Dakar to Saint Louis and the improvement of 50km of rural roads; 8 kms of urban roads and other integrated facilities such as construction or rehabilitation of solar powered social and marketing facilities, support to agricultural product processing, dune fixing, restoration of degraded plant cover, strengthening of the piezometric monitoring system and construction of wet retention basins.

Project approved	30 November 2022
Project completion	31 December 2027
Co-financers	Islamic Development Bank (IsDB), West African Development Bank (BOAD), OPEC Fund, Kuwait Fund for Arab Economic Development (KFAED), Arab Bank for Economic Development in Africa (BADEA), Saudi Development Fund (SDF), ECOWAS Bank for Investment **and Development (EBID), a private operator and counterpart funding by the Government of Senegal**

Actions: The IRM discovered that the portions concerned by the complaint were financed by the Arab Bank for Economic Development in Africa (BADEA) and the Kuwait Fund for Arab Economic Development (KFAED). Management indicated in its Response that the issues raised should be redirected to the respective financiers. It was noted that the financiers in question do not benefit from an Independent Recourse Mechanism. The IRM registered the complaints based on the AfDB ISS 2013 "Associated Facilities" principle to avoid denial of justice and to preserve complainants rights.

Next step: IRM intends to undertake an eligibility assessment mission in Senegal during the first quarter of 2026.



Sirari Corridor Accessibility and Road Safety Improvement Project: Isebania-Kisii-Ahero (A1) Road Rehabilitation, Kenya

Sector(s)	Transport
Location / Reference Number	Kenya / RQ2024/02
Complaint	Alleged violations of Bank's environmental and social safeguards related to involuntary resettlement and public consultation
Complainants	Chairman of the Nyangena Community (Kisii Interchange) on behalf of the affected community members
Status / Phase	Ongoing / Compliance Review

Complaint: In January 2024, the IRM received a Complaint concerning the road project, relating to a lack of or partial compensation, loss of businesses and livelihoods, concern about the safety and security of the community, health impacts, inaccessibility to essential services, inadequate communication and lack of proper notice, and inadequate public consultation.

- **Jan. - Feb. 2024** IRM received and registered the Complaint
- **Mar. 2024** IRM received a Management Response to the Complaint; IRM Director designated the Complaint for a compliance eligibility assessment
- **Jun. 2024** IRM undertook a compliance eligibility assessment field mission
- **Sep. 2024** IRM started preparing the compliance eligibility assessment report
- **Nov. 2024** The eligibility assessment report recommended a compliance review
- **Nov. - Dec. 2024** IRM started planning & preparation for a compliance review field mission
- **May. 2025** IRM compliance review mission
- **July 2025** IRM started preparing a draft compliance review report
- **Dec. 2025** The final draft compliance review report was under review for clearance

Project: The Project aims to facilitate inter-regional movement of passengers and freight, widening of access to local markets, and enhancing connectivity with social and economic centres in the region. It includes the improvement of Isebania-Kisii-Ahero road (172km) and the upgrading of feeder roads (77km) connected to the main roadway. Lot 1: Isebania Kisii Section Road Construction Civil Works; involves reconstruction of Isebania Kisii Section of Road A1, upgrading of 62km Feeder roads, 35.5km access roads, 18.2km service roads and Non-Motorized Transport (NMT) network facilities. Lot 2: Kisii Ahero Road Project Road Construction Civil Works; involve rehabilitation of Kisii Ahero (82.6 km) Section, upgrading of 81.8km Feeder roads, 25km access roads, 11.5km service roads, Non-Motorized Transport network facilities.

Project Approved	March 2016
Project Completion	30 June 2026
Co-financers	EU-Africa Infrastructure Trust Fund (EU-AITF) and a counterpart contribution by the Government of Kenya

Actions/Results: In June 2025, the IRM conducted a compliance review mission to Kisii, and conducted face-to-face interviews with the Complainants, other PAPs and relevant stakeholders. It prepared a draft Compliance Review Report that was under review for clearance by December 2025.

Next Steps: In 2026, the IRM will finalise the draft Compliance Review Report and share it with Bank Management and the Complainants for comments. Thereafter, the IRM will prepare a final Report with findings and recommendations for consideration by the Boards of Directors.



4th Bridge of Abidjan under the Abidjan Urban Transport Project, Côte d'Ivoire

Sector(s)	Transport
Location / Reference Number	Cote d'Ivoire / RQ 2023/01
Complaint	Alleged violations of AfDB's safeguards on labour conditions and occupational safety and health
Complainants	A lawyer on behalf of workers' representatives
Status / Phase	Ongoing / Compliance Review

Complaint: In January 2023, the IRM received a Complaint relating to alleged precarious daily and monthly contracts, abusive dismissal of workers, poor and inadequate treatment of survivors of accidents, restrictions of their rights to organise and their freedom of association, and lack of a grievance mechanism. The Complainants requested confidentiality due to fear of reprisals.

- **Jan. 2023** IRM received and registered the Complaint
- **Mar. 2023** IRM received a Management Response to the Complaint
- **Jul. 2023** IRM undertook a compliance review eligibility assessment field mission
- **Oct. 2023** IRM issued the Compliance Review Eligibility Assessment Report
- **Nov. 2023** IRM compliance review mission took place
- **Dec. 2023** IRM started preparing a draft compliance review report
- **Dec. 2024** The final draft compliance review report was under review by IRM consultant
- **Jan.- Nov. 2025** IRM reviewed the draft compliance review report
- **Dec 2025** The final draft compliance review report was under review for clearance

Project: The Abidjan Urban Transport Project (AUTP) includes in one of its two phases the construction of the 4th Bridge linking Yopougon to Plateau. The AUTP aims to improve the living conditions of the population in its impact area, specifically by significantly improving traffic flow in Abidjan, reducing air pollution, addressing youth unemployment, and improving the income of the population, particularly women business operators.

Project Approved	December 2016
Project Completion	31 December 2027
Co-financers	Global Environment Facility (GEF), Japanese International Cooperation Agency (JICA) and a counterpart contribution by the Government of Côte d'Ivoire

Actions/Results: In 2025, the IRM reviewed the draft compliance review to ensure consistency of information and update the draft report. The final draft report was being reviewed for clearance by the end of 2025.

Next Steps: In 2026, the IRM will finalise the draft Compliance Review Report and share it with Bank Management and the Complainants for comments, after which it will prepare a final Report with findings and recommendations for consideration by the Boards of Directors.



Photovoltaic Solar Power Projects under the Feed-in-Tariff (FiT) Program, Egypt

Sector(s)	Energy
Location / Reference Number	Egypt / RQ 2022/04
Complaint	Alleged violations of AfDB's labour conditions and health and safety standards
Complainants	Two Egyptian nationals on behalf of 62 people
Status / Phase	Ongoing / Compliance Review

Complaint: In September 2022, the IRM received a Complaint relating to companies supplying services to the project. The Complaint relates to poor labour conditions, including inadequate salaries, insufficient food and transportation allowances, health and safety risks, irregular human resource processes and unresponsive grievance mechanisms.

- **Sep. 2022** IRM received and registered the Complaint
- **Oct. 2022** IRM received a Management Response to the Complaint
- **Nov. 2022** IRM undertook a compliance review eligibility assessment field mission
- **Mar. 2023** IRM issued the Compliance Review Eligibility Assessment Report
- **May - Jun. 2023** IRM conducted a compliance review mission to Egypt
- **Aug. 2023 – Jun. 2024** IRM prepared a draft Compliance Review Report, which was reviewed several times by the IRM
- **Jul. 2024** IRM sent its Draft Compliance Review Report to Complainants and Management for comments
- **Aug. 2024** IRM received Management comments on the draft Compliance Review Report
- **Sep. - Dec. 2024** IRM updated the draft the Compliance Review Report
- **Oct. 2025** IRM hired an external consultant to review the project documents and the draft compliance review report and advise the IRM on the way forward
- **Dec. 2025** The report of the consultant was under review by the IRM

Project: The Project involves the construction of three 50-megawatt photovoltaic solar-power plants in Egypt, under the Feed-in-Tariff (FiT) Program. The objective is to increase Egypt's power generation capacity, diversify its energy mix, enable significant reductions in fossil fuel use and reduce carbon emissions by 4.8 million metric tonnes over the 25-year term of the Power Purchase Agreements.

Project Approved	September 2017
Project Completion	January and March 2019
Co-financers	Global Environment Facility, International Finance Corporation, Multilateral Investment Guarantee Agency and the European Bank for Reconstruction and Development

Actions/Results: In 2025, the IRM hired a consultant to review the project documents and the draft compliance review report and advise the IRM on the way forward in handling this case. At the end of December 2025, the external consultant's report, submitted in November 2025, was under review by the IRM.

Next Steps: In 2026, the IRM will finalise reviewing the consultant's report and decide on the way forward.



Lomé–Cotonou Road Rehabilitation-Phase 2 and Coastal Protection Project, Togo

Sector(s)	Transport
Location / Reference Number	Togo / RQ2022/02
Complaint	Lack of compensation for project-affected people and loss of livelihoods and businesses
Complainants	Two individuals representing a group of project-affected people (PAPs) and business owners
Status / Phase	Ongoing / Compliance Review

Complaint: In January 2022, IRM received a Complaint from members of the group of people affected by the Avepozo–Aneho Section of the project. Their complaint centred on the loss of their businesses, resulting in the loss of their livelihoods without compensation, the start of the road rehabilitation works without proper consultation and prior compensation for all residents affected by the project.

- **Jan. - Feb 2022** IRM received and registered the Complaint
- **Mar. 2022** IRM received a Management Response to the Complaint
- **May 2022 - Oct. 2023** The Complaint was temporarily suspended
- **Oct. 2023** The temporary suspension ended, and the Complaint was transferred to a compliance review
- **Nov. 2023** IRM started an eligibility assessment of the Complaint for compliance review
- **Mar. 2024** IRM issued the Compliance Review Eligibility Assessment Report
- **Jun. 2024** IRM undertook a compliance review field mission to Togo
- **Aug. 2024** IRM started preparing the draft compliance review report
- **Dec. 2024** The draft compliance review report was under review by IRM consultant
- **Jan.- Nov. 2025** IRM reviewed the draft compliance review report
- **Dec. 2025** The final draft compliance review report was under review for clearance

Project: The Lomé-Cotonou Road Rehabilitation and Coastal Protection Project (Phase II) is part of the Abidjan-Lagos Corridor. The objective is to improve service in transportation logistics, traffic flow in the Abidjan-Lagos corridor, as well as the living conditions of the population in the affected project zone. It also aims to strengthen the climate resilience of infrastructure in coastal Togo and Benin. The Project will directly benefit road users as well as the 1.7 million people in the project area.

Project Approved	December 2016
Project Completion	31 December 2027
Co-financers	Global Environment Facility (GEF), Japanese International Cooperation Agency (JICA) and a counterpart contribution by the Government of Togo

Actions/Results: In 2025, the IRM reviewed the draft compliance report to ensure consistency of information and update the draft report. The final draft Compliance Review Report was being reviewed for clearance at the end of 2025.

Next Steps: The IRM will finalise the draft Compliance Review Report in 2026 and share it with Bank Management and the Complainants for comments, after which it will prepare a final Report with findings and recommendations for consideration by the Boards of Directors.



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

Sector(s)	Agriculture
Location / Reference Number	Uganda / RQ2021/04
Complaint	Alleged violations of AfDB's environmental and social policies
Complainants	Human rights NGO in Uganda representing local fisherfolk
Status / Phase	Ongoing / Compliance Review (monitoring stage)

Complaint: In November 2021, the IRM received a Complaint from a human rights body in Uganda representing local fisherfolk who alleged that they were negatively impacted by the Project. The Complaint is related to inadequate consultations; loss of boats, fishing equipment, and other sources of income without compensation, affecting the livelihoods of project-affected people (particularly women); use of excessive force that resulted in fatalities; and retaliation against people who voiced grievances. Complainants requested confidentiality due to fear of reprisals against them.

- **Nov. - Dec. 2021** IRM received and registered the Complaint
- **Jan. 2022** IRM received a Management Response to the Complaint
- **May. 2022** IRM issued the Compliance Review Eligibility Assessment Report
- **Jul. - Aug. 2022** IRM undertook a compliance review field mission
- **Apr. 2023** The Draft Compliance Review Report was sent to Complainants and Management for comments
- **May 2023** IRM received comments on the draft Compliance Review Report
- **Jul. 2023** The Final Compliance Review Report was sent to the Boards of Directors and Bank Management
- **Sep. 2023** Bank Management sent a draft Management Action Plan (MAP) to IRM and Complainants for comments
- **Oct. 2023** IRM and Complainants provided comments to draft MAP
- **Nov. 2023** A meeting with the Boards of Directors was scheduled (then postponed to February 2024)
- **Feb. 2024** The Boards of Directors approved the recommendations in the IRM Report and requested Management to revise its Action Plan
- **May 2024** The Boards of Directors endorsed the Revised Management Action Plan
- **2025** The IRM reviewed one Implementation Progress Report and other updates submitted to the Boards of Directors by Bank management

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 area. The project is also designed to strengthen the capacity of government institutions to promote environmentally friendly uses of the Lakes' resources, to enable regional trade, and to contribute to the creation of alternative income opportunities and food security for the fishing communities.

Project Approved	May 2015
Project Completion	December 2021
Co-financers	Global Environment Facility and the Nile Equatorial Lakes Subsidiary Action Program

Actions/Results: In 2025, the IRM reviewed one Implementation Progress Reports and other updates submitted to the Boards of Directors by Bank management for information, and took note of the progress made and the challenges faced by the project implementation unit in implementing two of the action items.

Next Steps: The IRM will continue to review the Implementation Progress Reports submitted to the Boards of Directors by Bank Management and note the progress achieved. It will also monitor the implementation of the Board's approved Revised Management Action Plan in 2026.



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

Sector(s)	Agriculture
Location / Reference Number	Uganda / RQ2021/03
Complaint	Alleged violations of AfDB's environmental and social policies
Complainants	Representatives of Paten community
Status / Phase	Ongoing / Compliance Review (monitoring stage)

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

- **Oct. – Nov. 2021** IRM received and registered the Complaint
- **Dec. 2021** IRM received a Management Response to the Complaint
- **Apr. 2022** IRM issued the Compliance Review Eligibility Assessment Report
- **Jul. 2022** IRM undertook a compliance review field mission
- **Jul. 2023** The Draft Compliance Review Report was sent to Complainants and Bank Management for comments
- **Aug. 2023** IRM received comments on the draft Compliance Review Report
- **Sep. 2023** The Final Compliance Review Report was sent to the Boards of Directors and Bank Management
- **Oct. 2023** Bank Management sent a draft Management Action Plan (MAP) to IRM and Complainants for comments; IRM and Complainants provided comments to draft MAP
- **Nov. 2023** A meeting with the Boards of Directors was scheduled (and postponed to February 2024)
- **Feb. 2024** The Boards of Directors approved the recommendations in the IRM Report and requested Management to revise its Action Plan
- **May 2024** The Boards of Directors endorsed the revised Management Action Plan (MAP)
- **2025** IRM reviewed one Implementation Progress Report, and other updates submitted to the Boards of Directors by Bank management.

Project: The Project aims to improve farm incomes, rural livelihoods and food security, as well as contribute to 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 the FIEFOC 2.

Project Approved	January 2016
Project Completion	31 December 2026
Co-financers	Nordic Development Fund and a counterpart contribution by the Government of Uganda

Actions/Results: In 2025, the IRM reviewed one Implementation Progress Report and a revised version of the Report and other updates submitted to inform the Boards of Directors by Bank Management, and took note of the progress made in the implementation of the actions in the approved Revised MAP.

Next Steps: The IRM will continue to review the Implementation Progress Reports submitted to the Boards of Directors by Bank Management and note the progress achieved. It will also monitor the implementation of the Boards' approved Revised MAP in 2026.



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

Sector(s)	Transport
Location / Reference Number	Senegal / RQ2019/01
Complaint	Alleged violations of the Bank's Involuntary Resettlement Policy
Complainants	Lumière Synergie pour le Développement (LSD) and Collectif National representing project-affected people (PAPs)
Status / Phase	Ongoing / Compliance Review (monitoring stage)

Complaint: In June 2019, the IRM received a Complaint from LSD and Collectif National representing PAPs regarding the Regional Express Train Project. The Complainants' concerns related to inadequate compensation, delays in compensation payments to vulnerable PAPs, PAPs being omitted from the list of people to be compensated, and inappropriate pressure on PAPs to vacate the rights-of-way.

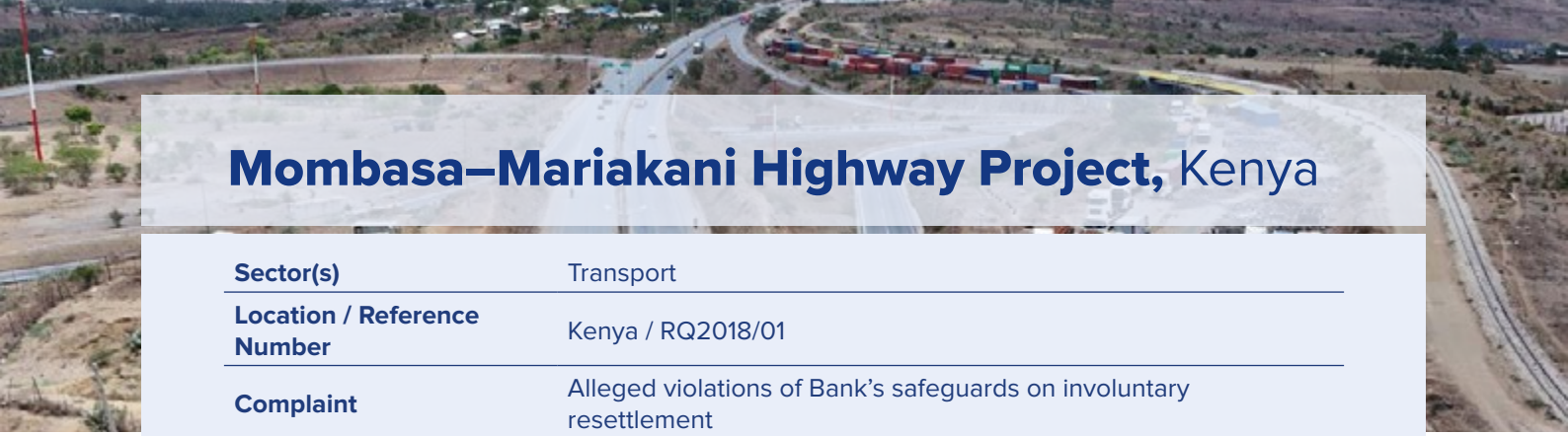
- **Jun. 2019 – Oct. 2021** IRM received the Complaint; a problem-solving exercise was undertaken
- **Nov. 2021** IRM transferred the case to compliance review for an eligibility assessment
- **Feb. 2022** IRM issued the Compliance Review Eligibility Assessment Report
- **Mar. 2022** IRM undertook a compliance review mission
- **Feb.2023** IRM shared the draft Compliance Review Report with Bank Management and Complainants
- **Apr. 2023** IRM submitted the final Compliance Review Report to Boards of Directors and Bank Management
- **Jul. – Aug. 2023** Complainants and IRM submitted comments on the draft Management Action Plan (MAP)
- **Nov. 2023** Bank Management submitted the MAP to the Boards of Directors and the IRM; the Boards endorsed IRM recommendations and approved the MAP
- **Dec. 2023** The Complaint entered monitoring phase
- **Dec. 2024** IRM conducted its first monitoring mission to Senegal and was waiting to receive additional information and documents from Bank Management as at the end of 2024
- **Feb.- Oct 2025** IRM received information and additional documents from Bank Management and the complainants.
- **Nov-Dec 2025** IRM prepared draft First Monitoring Report which was under review for clearance by end of December 2025

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 and traffic congestion.

Project Approved	June 2015
Project Completion	31 December 2025
Co-financers	Islamic Development Bank, French Development Bank, the French Treasury; and a counterpart contribution by the Government of Senegal

Actions/Results: In 2025, the IRM received additional documents and information from Bank management on the implementation of the Boards approved MAP and completed a draft First Monitoring Report, which was under review for clearance by end of December 2025.

Next Steps: In 2026, the IRM will share the Final Draft First Monitoring Report with Bank Management and the complainants for clarification of issues. It will then finalise the report considering the clarifications/comments received from the Bank Management and the Complainants. It will submit the final Report to the Boards of Directors for consideration.



Mombasa–Mariakani Highway Project, Kenya

Sector(s)	Transport
Location / Reference Number	Kenya / RQ2018/01
Complaint	Alleged violations of Bank's safeguards on involuntary resettlement
Complainants	Three individuals representing project-affected people (PAPs)
Status / Phase	Ongoing / Compliance Review (monitoring stage)

Complaint: In 2017 and 2018, the IRM received three Complaints related to the Mombasa–Mariakani Highway Project from representatives of PAPs who lived along part of the project corridor. In addition to issues related to the compensation of PAPs that have been addressed through the problem-solving process, the Complaints raised issues of the alleged violation of the AfDB's Policy on involuntary resettlement.

- **2017 - 2018** IRM received and registered three Complaints
- **2018 - 2021** A problem-solving process was undertaken
- **Jan. 2022** IRM transferred the case to compliance review for eligibility assessment; IRM continues to monitor the implementation of the mediated action plan
- **Feb. - Mar. 2022** A compliance review eligibility assessment report and compliance review field mission were undertaken
- **Jul. 2022** IRM shared the draft Compliance Review Report with Bank Management and Complainants for comments
- **Aug. 2022** IRM received comments from Management and the complainants
- **Sep.2022** IRM submitted the final Compliance Review Report to the Boards of Directors and Bank Management to prepare a Management Action Plan (MAP)
- **Sep. 2022** Bank Management sent the draft MAP to the IRM and Complainants for comments
- **Oct. 2022** The IRM and the Complainants provided comments to the draft MAP
- **Nov. 2022** Management Response and Action Plan sent to the Boards
- **Feb. 2023** The Boards endorsed the IRM report and recommendations and asked Bank Management to revise their MAP and present it again for approval
- **Jul. 2024:** Bank Management submitted the Revised MAP to the Boards of Directors for consideration
- **Sep. 2024** The Boards of Directors approved the Revised MAP
- **July 2025** IRM requested for updates from Bank Management on the status of implementation of approved Revised MAP
- **Aug -Sept 2025** IRM received the updates and documents from Bank management on the status of implementation of the Revised MAP

Project: The Project is rehabilitating and expanding 42 kilometres of roadway between Mombasa and Mariakani in Eastern Kenya. It aims to improve the transportation of goods, as well as passenger traffic, along the Northern Corridor. Lot 1 (one of two lots) encompasses 11.4 kilometres from Mombasa to Kwa Jomvu, and is financed by the AfDB and subject to the Bank's 2013 Integrated Safeguards System.

Project Approved	March 2015
Project Completion	30 June 2026
Co-financers	European Investment Bank, German Development Bank, Africa Infrastructure Trust Fund, and a counterpart contribution by the Government of Kenya

Actions/Results: In 2025, the IRM requested and received updates and documents on the status of implementation of the Revised MAP from Bank Management. Due to internal constraints in the IRM, the IRM was unable to review Management updates and prepare the first monitoring report for this project.

Next Steps: In 2026, the IRM will review the updates and documents received from Bank Management on the status of implementation of the Revised MAPs and prepare a draft first monitoring report. It will share this draft report with Bank Management and the Complainants for clarification of issues. Thereafter, it will finalise the First Monitoring Report and submit it to the Boards of Directors for consideration.



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

Sector(s)	Transport
Location / Reference Number	Guinea-Conakry / RQ2016/03
Project Approved / Planned Completion	December 2014 / 31 December 2026
Complaint	Alleged violations of AfDB's environmental and social policies
Complainants	Two Guinean nationals working with a local NGO for project-affected people (PAPs)
Status / Phase	Ongoing / Compliance Review (monitoring stage)

Complaint: The Guinea Road Project is part of the Mano River Union (MRU) Regional Program, designed to improve road infrastructure to support economic recovery in the post-conflict region of the MRU. In September 2016, the IRM received a Complaint from two Guinean nationals working with a local NGO representing PAPs. It related to potential damage to ecosystem services that are a source of livelihood for many people, inadequate assessment of potential negative impacts, mitigation measures and environmental protection, and inadequate public consultation.

Actions/Results: In 2025, the IRM requested and obtained updated information from Management on the status of the MAP's implementation to prepare the fourth monitoring report for this project. However, due to internal constraints, the IRM was unable to review Management's updates in preparation of the fourth monitoring report for the project.

Next Steps: In 2026, the IRM will review the updates and documents received from Bank Management on the status of implementation of the MAP and prepare a draft fourth monitoring report. It will share this draft report with Bank Management and the Complainants for clarification of issues. Thereafter, it will finalise the fourth monitoring report and submit it to the Boards of Directors for consideration.



Construction of 125 MW Sendou Coal Power Plant, village of Bargny Minam, Senegal

Sector(s)	Energy
Location / Reference Number	Senegal / RQ2016/02
Project Approved / Project Completed	November 2009 / October 2018
Complaint	Alleged violations of the Bank's environmental and social policies
Complainants	Local NGO and two individuals representing two groups of project-affected people (PAPs)
Status / Phase	Ongoing / Compliance Review (monitoring stage)

Complaint: The Project supported the Senegalese government's Energy Sector Development Policy aimed at improving the reliability and cost of the country's electric power supply. In May and July 2016, the IRM received complaints related to the disruption of livelihoods, adverse impacts on marine life, health risks from air pollution, land ownership claims at the Project location and inadequate public consultations.

Actions/Results: In 2025, the IRM requested and obtained updated information from Management on the status of implementation of the revised (July 2020) Management Action Plan, with the intention of preparing an updated draft of the fifth monitoring report for this project. However, due to internal staffing constraints, the IRM was unable to conduct a monitoring mission to Senegal to verify the information provided in Management's implementation updates.

Next Steps: In 2026, the IRM will conduct a field mission to Senegal, after which it will update the fifth draft monitoring report and share it with the Bank for clarification of issues. The IRM will finalise the report and send it to the Boards of Directors for consideration.



Diversification of the Activities of the Modern Mills Project - M3, Mali

Sector(s)	Agro-business
Location / Reference Number	Mali / RQ2016/01
Project Approved / Project Completed	September 2014 / September 2019
Complaint	Alleged violations of AfDB's environmental and social policies
Complainants	International NGO with representation in Mali for project-affected people (PAPs)
Status / Phase	Ongoing / Compliance Review (monitoring stage)

Complaint: The Project aimed to expand M3's processing facilities to produce semolina, pasta, couscous and flour. In March 2015, the IRM received a Complaint from an international NGO representing PAPs related to land grabbing by the M3 Project in two villages, violations of human rights and threats to the physical security of the PAPs, and inadequate compensation for their land.

Actions/Results: In 2025, the IRM requested for and obtained updated information from Management on the status of implementation of the Management Action Plan. it prepared a draft fifth monitoring report but did not complete it due to internal staff constraints.

Next Steps: The IRM will finalize the draft fifth monitoring report in 2026 and share it with Bank Management and the complainants to obtain clarifications on specific issues. After receiving and reviewing the clarifications and comments, the IRM will finalize the fifth Monitoring Report and submit it to the Boards of Directors for consideration.



Medupi Power Project, South Africa

Sector(s)	Energy
Location / Reference Number	South Africa / RQ2010/02
Project Approved / Project Completed	November 2009 / June 2021
Complaint	Alleged violations of AfDB's environmental and social policies
Complainants	Two individuals
Status / Phase	Ongoing / Compliance Review (monitoring stage)

Complaint: The Project involved construction of a 4,764-megawatt coal-fired power plant in Lephalale, Limpopo province, South Africa to increase the country's energy generation to meet growing electricity demand. In September 2010, the IRM received a Complaint from two individuals related to inadequate consultations, the desecration of graves and the burden of hidden costs for public health risks due to emissions for communities living near the Plant. The Complainants requested confidentiality.

2025 Actions/Results: In 2021, the IRM suspended monitoring of the MAP until 2026, as the two outstanding action items — reducing public health risks from emissions and ensuring compliance with the Bank's Integrated Water Resources Management Policy — were not expected to be completed before that time. In the interim, the IRM received Information Notes from Bank Management outlining progress made by Eskom, the project implementation unit. In 2025, the IRM requested an Information Note from Bank Management that could potentially have been submitted to the Boards of Directors for information. However, according to Bank Management, no submission to the Boards in 2025 was made to that effect.

Next Steps: The IRM will continue to follow up with Bank Management to obtain Information Notes on the steps taken by Eskom to address the pending action items and will update the Boards of Directors. It will also consider (if its internal capacity allows) conducting a monitoring mission to South Africa to monitor the progress made by Eskom in implementing the two remaining action items.

Problem-Solving Cases

4 In 2025, the IRM handled four problem-solving cases in Burundi, Cameroon, Kenya and Senegal.

What Happens when a Complaint is Submitted?

Complaint Registered:
The IRM receives the complaint, makes sure it meets the complaints' criteria for registration and, if it does, officially registers it. The compliance review process then follows the steps below.

Eligibility Assessment:
The IRM begins with an eligibility assessment to better understand the issue(s), the parties involved, and their interests, to determine if they are willing and able to engage effectively in a problem-solving exercise.

Capacity Development:
If the parties are amenable to resolving the issue(s) in a collaborative manner, the IRM works with the parties to build their own internal capacities to engage, and supports the design of mutually agreed-upon ground rules that will help govern the mediation process.

Dialogue Facilitation:
The dialogue facilitation process begins with an independent mediator helping the parties to work through different issues

Agreement Reached:
If the problem-solving exercise is successful, it will typically result in an agreement between the parties outlining their plan to jointly resolve their issue(s). Regardless of the outcome, the IRM will prepare a summary report, which is shared with the parties.

Monitoring Implementation:
If agreed to by the parties, the IRM will help to monitor the implementation of the agreement.



The Mombasa–Mtwapa–KwaKadzengo–Kilifi Dualling (A7) Road under the Multinational Bagamoyo–Horohoro/Lunga Lunga–Malindi Road Project, Phase I, Kenya

Sector(s)	Transport
Location / Reference Number	Kenya / RQ2023/02
Complaint	Alleged violations of the Bank's safeguards on environmental and social assessment and involuntary resettlement
Complainants	A local community-based organisation representing project-affected people (PAPs)
Status / Phase	Problem-Solving closed in December 2025

Complaint: In March 2023, the IRM received a Complaint filed by a local community-based organisation representing over 200 community members along the road corridor who claim to have been adversely affected by the Project. The Complainants allege inadequate public consultations, lack of proper communication on the valuation of affected property, issues with compensation and relocation of PAPs, and insufficient communication on the environmental and social impact assessment, preventing the community from assessing proposed mitigation measures for environmental damage.

- **Mar. – Apr. 2023** IRM received and registered the Complaint
- **May 2023** IRM received a Management Response to the Complaint
- **Jul. 2023** IRM undertook an eligibility assessment field mission
- **Aug. 2023** IRM completed the eligibility assessment report
- **Nov. 2023** IRM held preliminary meetings for the process with the representatives of the Complainants and Kenya National Highways Authority - KeNHA (the Parties) and the Bank Project Team
- **Jan. - Feb. 2024** IRM conducted capacity-building sessions with the Parties
- **Mar. 2024** Parties signed a Problem-Solving Framework
- **Mar. - Dec. 2024** IRM held six physical mediation sessions with the Parties and their advisors in Mombasa and several virtual sessions with the Parties and their advisors. The Parties signed the First Interim Agreement in July. The parties signed the Second and Third Interim Agreements in October. In December, the Parties signed the Fourth Interim Agreement
- **Jan-Dec 2025** Three physical mediation sessions and several online monitoring sessions were held. The parties signed two more Interim Agreements in March and June, and a Partial Mediation Agreement in July 2025. Draft Problem-Solving Closure Report was prepared and was under review by end of December 2025.

Project: The Project is a 454-kilometre component of the East African transport corridors network, connecting Kenya and Tanzania, and will be implemented in phases. Phase 1 involves the construction of a 121-kilometre Mkange–Pangani section in Tanzania and a 54-kilometre Mombasa–Kilifi section in Kenya. The Kenyan section is divided into two lots: Lot 1: 13.5-kilometre Mombasa–Mtwapa section, and Lot 2: 40.5 kilometre Mtwapa–Kwa Kadzengo–Kilifi section.

Project Approved	December 2019
Project Completion	31 December 2027
Co-financers	European Union (EU)

Actions/Results: In 2025, the IRM held 3 physical mediation sessions with the Parties in Mombasa. It also held several virtual meetings with the Parties to follow up on implementation of the two Interim Agreements reached by the Parties in March and June 2025 respectively, and a Partial Mediation Agreement signed by the Parties in July 2025. The IRM also agreed to extend the mediation period from 30 June 2025 to 30 September 2025 to give the Parties time to resolve the pending issues. The mediation period ended on 30 September 2025 and the IRM prepared a draft Problem-Solving Closure Report, which was under review at the end of December 2025.

Next Steps: In 2026, the IRM will finalize the draft Problem-Solving Closure Report and submit it to the Boards of Directors and the President for consideration. It will also share the Report with the Parties for information.



Nachtigal Hydro Power Project, Cameroon

Sector(s)	Energy
Location / Reference Number	Cameroon / RQ2022/03
Complaint	Alleged violations of the Bank's Involuntary Resettlement Policy
Complainants	IFI Synergy (a coalition of NGOs) representing communities from four villages
Status / Phase	Problem-Solving closed (monitoring stage)

Complaint: In 2022, the IRM received a Complaint from IFI Synergy, a coalition of NGOs, on behalf of communities from four villages regarding the Nachtigal Hydro Power Company (NHPC) Project. Their concerns related to compensation and resettlement issues pertaining to late and insufficient compensation, loss of livelihood, worsening social ills, degradation of the environment, improper consultations and the destruction of sacred sites. The same complaint was also received by the accountability mechanisms of the International Finance Corporation (IFC) and of the World Bank.

- **Jun. 2022** IRM received and registered the Complaint
- **Jul. 2022** IRM received a Management Response to the Complaint
- **Aug. 2022** IRM undertook a problem-solving eligibility assessment mission in conjunction with the Compliance Advisor Ombudsman (CAO) from the IFC
- **Nov. 2022** A joint problem-solving/mediation process began
- **Feb. – Nov. 2023** Seven problem-solving missions were carried out
- **Apr. 2023** CAO (IFC), Dispute Resolution Service (DRS) of the World Bank, and IRM (together called AMG) signed a Memorandum of Understanding (MoU) to jointly handle the case; Parties (NHPC and community representatives) agreed to the problem-solving framework and participated in capacity-building activities
- **Dec. 2023** The problem-solving process reached its one-year targeted completion date and was extended for an additional six months
- **Jan. – Nov. 2025** IRM concluded the problem-solving exercise with parties reaching agreements on the issues raised
- **Jan. – Dec 2025** IRM participated in 12 virtual meetings with CAO of IFC and Dispute Resolution Service of the World Bank as part of their joint collaboration in the handling of the case to monitor the implementation of the Agreement

Project: The NHPC Project entails the design, financing, construction, operation and transfer of a greenfield hydropower plant in Nachtigal, Cameroon, with an installed capacity of 420 megawatts. It is expected to support 30% of Cameroon's electricity production, for approximately 10 million people.

Project Approved	November 2017
Project Completion	November 2036
Co-financers	International Finance Corporation, World Bank, Africa Finance Corporation, French Development Agency, British International Investment, Emerging Africa Infrastructure Fund, European Investment Bank, German Investment Corporation, Nederlandse Financierings-Maatshcappij Voor Ontwikkelingslanden, Proparco, OPEC Fund for International Development, local commercial lenders led by Société Générale, and a counterpart contribution by the Government of Cameroon

Actions/Results: Between January and December 2025, IRM, in collaboration with the IFC's CAO and the Dispute Resolution Service of the World Bank's Accountability Mechanism, held 12 virtual meetings as part of their monthly monitoring of the agreement's implementation. The mechanisms also received reports from the local joint monitoring committee, which includes representatives of the complainants and the company (NHPC), supported by local mediators on the ground. While significant progress has been made in implementing the agreements, several critical issues remain that require further discussion between the parties.

Next Steps: The IRM, together with other IAMs involved (DRS of the World Bank and CAO of IFC) will continue to monitor the implementation of the Agreement and assist the Parties if need be.



Malicounda 120 MW Dual-Fuel Project, Senegal

Sector(s)	Energy
Location / Reference Number	Senegal / RQ2022/01
Complaint	Alleged violations of the Bank's Policy on involuntary resettlement
Complainants	Lumière Synergie pour le Développement and 12 project-affected people (PAPs)
Status / Phase	Problem-Solving closed (monitoring stage)

Complaint: In December 2021, the IRM received a Complaint filed by the NGO "Lumière Synergie pour le Développement" and 12 PAPs. The Complaint related to inadequate and late compensation for land, ineffective implementation of the livelihood improvement programme and negative environmental and social impacts.

- **Dec. 2021 – Jan. 2022** IRM received and registered the Complaint
- **Feb. 2022** IRM received a Management Response to the Complaint
- **May. 2022** IRM held a virtual problem-solving eligibility assessment mission
- **Sep. 2022** A problem-solving framework was established; and the problem-solving/mediation process began
- **Feb. 2023** IRM convened a meeting with Malicounda Power company and the representatives of the PAPs (the Parties) to discuss the restoration of the Complainants' livelihoods
- **Dec. 2023** IRM concluded the exercise with a problem-solving mission and Agreement on issues
- **Dec. 2024** IRM travelled to Senegal to monitor the implementation of the mediation Agreement
- **Aug.- Dec. 2025** IRM monitored the implementation of the Settlement Agreement through desk review of documents and exchanges with the Complainants and the Malicounda Power Company

Project: The Project, to be developed by Malicounda Power SAS, entails the design, financing, construction, operation and transfer of a greenfield dual-fuel power plant in Malicounda, Senegal, with an installed capacity of 135 megawatts and a guaranteed capacity of 120 megawatts. The overall goal of the project is to increase Senegal's national power generation capacity by 15%. Once operational, it will be the largest power plant in the country.

Project Approved	November 2018
Project Completion	May 2037
Co-financers	Arab Bank for Economic Development, OPEC Fund for International Development and West African Development Bank

Actions/Results: From August to December 2025, IRM monitored the implementation of the action plan under the Agreement through a desk review based on reports provided by the complainants and exchanges with the company. The Agreement is being implemented, as the challenge related to resource availability has been resolved.

Next Steps: In 2026, the IRM will continue to monitor the implementation of the mediation agreement with the objective of closing the case as the action plan can be fully implemented.



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

Sector(s)	Transport
Location / Reference Number	Burundi / RQ2021/01
Project Approved / Planned Completion	February 2017 / April 2024
Complaint	Alleged violations of the Bank's Involuntary Resettlement Policy
Complainants	Family of the late Daniel Zubatse
Status / Phase	Problem-Solving closed (monitoring stage)

Project / Complaint: The Project relates to the upgrading and asphalting of the 24-kilometre long National Highway No. 18 to facilitate the movement of goods and people to strengthen social cohesion and improve living conditions in the area. On 6 January 2021, the IRM received a Complaint from the family of the late Daniel Zubatse regarding the deviation of the Project's road construction, which encroached on and destroyed their property. The complaint was registered on 22 February 2021, and Management was received on 1 March 2021. After four virtual mediation meetings held on 10 and 17 June, 2 July and 9 September 2021, the parties reached an agreement to resolve the problems raised in the Complaint. For the implementation such agreements, the parties agreed on an action plan with a clear timetable.

Actions/Results: In 2025, IRM continued monitoring the implementation of the Settlement Agreement, which had been contested. In November 2025, complainants alleged that no progress had been made. Subsequently, the IRM contacted the Bank's project team to obtain an update from the Burundi Road Agency (ARB) on the status of the Agreement. No response was received by the end of 2025.

Next Steps: In 2026, with the persistence of disagreements over the implementation of the Agreement, the IRM will assess the situation and consult with the parties to close the case and decide on next steps.



Cases under Temporary Suspension

2

In 2025, the IRM deferred one complaint from Madagascar, and continued to follow up on one complaint deferred in 2024 from Cameroon.

Temporary Suspension

What does it do?

Temporary suspension aims to increase the accessibility and efficiency of the complaints-handling process.

How does it do that?

Complaint deferral (temporary suspension), introduced in the IRM Rules of 2021, allows certain registered complaints to be put on hold to offer Bank Management and the Complainants the opportunity to work together to resolve issues raised in the complaint.

Then what?

Following a time-limited suspension period, the IRM assesses the progress made in resolving the issues and chooses to either extend the deferral period, lift the deferral and process the case through the complaints-handling function, or close the case if all the issues have been addressed to the satisfaction of the Complainants.



Transport Sector Support Program: **Development of the Batchenga-Ntui-Yoko-Lena Road, Phase I,** Cameroon

Sector(s)	Transport
Location / Reference Number	Cameroon / RQ2024/05
Complaint	On 20 June 2024, the IRM received a complaint from members of the Ntui - Ndjolé road community related to lack of compensation and unfair compensation process, inadequate consultations, loss of livelihoods, inaccessibility to people's properties and damage to properties.

Project: On November 26, 2014, the AfDB Boards of Directors approved the draft Transport Sector Support Program in Cameroon. The first phase of this program consists of the development of the Batchenga-Ntui-Yoko-Lena road, with a length of approximately 248.60 km. This road is part of the national roads RN15 (Batschenga-Tibati) and RN6 (Tibati Mambal), as well as the provincial road No. 15A (Mambal-Lewa). Co-financiers are the French Development Agency, the Development Bank of Central African States, JICA (ACFA) and the Government of Cameroon.

Actions/Results: The complaint was registered on 2 July 2024, and the Management response was received 2 August 2024. IRM decided to put the case on temporary suspension on 20 August 2024 for 45 days i.e. until 21 October 2024.

In 2025, IRM continued its evaluation of the temporary suspension through a desk review of reports received from both parties and interviews with the complainants and Bank Management. The completion of this assessment was hindered by delayed feedback from Bank Management.

Based on the issues raised by the complainants, the IRM concluded that some progress had been made on compensation payments and on the access road, as indicated by the Bank's project team. While the complainants acknowledged these improvements, they still claimed that the compensation was inadequate as it did not cover all their assets.

Next Steps: In 2026, IRM will close the temporary suspension and determine the next steps—either closing the case or transferring it to compliance review process.



The Lower Mangoky Irrigated Area Rehabilitation and Extension Project, Phase II, Madagascar

Sector(s)	Agriculture
Location / Reference Number	Madagascar / RQ2024/04
Complaint	On 22 May 2024, the IRM received a complaint form an organization for the defense of human rights and social, economic and ecological justice based in Madagascar, namely CRAADOI (Research and Support Center for Development Alternatives – Indian Ocean) on behalf of people affected by the project (PAPs). The complaint is related to land and compensation issues.

Project: The PRBM II project, approved in November 2014, aims to rehabilitate and extend irrigation infrastructure in Madagascar's Lower Mangoky plain. It focuses on improving water mobilization, irrigated plots, and agricultural practices to boost annual production by 44,000 tons of paddy rice and 2,400 tons of peas. The project directly benefits about 45,000 people and is expected to nearly triple household income. Beneficiaries participate in project oversight through dedicated committees and receive training to ensure sustainable management of developed infrastructure.

Actions/Results: The complaint was registered on 13 June 2024 and the Management response was received on 4 February 2025. Following an internal assessment and consultations with the complainants and the Bank project team, the complaint was deferred for 45 days, from 2 May to 7 July 2025. This temporary suspension allowed the complainants and the Project Implementation Unit to engage in discussions regarding the land-related issues raised. At the end of the suspension period, IRM held virtual meetings with both the Bank's project team and the complainants. Based on responses to an evaluation questionnaire, the IRM noted that an action plan prepared by the Project Implementation Unit had resulted in significant progress in addressing the main concerns of the complainants. However, some actions initially scheduled for 2025 were postponed to the first quarter of 2026 due to the political context of the country.

Next Steps: IRM will reassess the situation and determine the next steps during the first quarter of 2026.

Case closed after receiving Management Response



Youth Entrepreneurship for Climate Change Adaptation Project, Djibouti

Sector(s)	Agriculture
Location / Reference Number	Djibouti / RQ2025/02
Complaint	On 3 December 2024, the IRM received a complaint submitted by a representative of the elders of the Hanle community, concerning a lack of consultation as well as potential harm related to air pollution, soil contamination, land degradation, and erosion.

Actions/Results: On 3 February 2025, the IRM requested and received additional information concerning the issues raised in the complaint. The complaint was registered on 12 February 2025, and the Management Response was received on 14 March 2025. Management acknowledged concerns raised by the Complainant and reaffirmed its commitment to mitigating the potential risks and to ensuring that the community will be consulted throughout the project implementation and that any concerns raised will be responded to in a timely manner. The complainant expressed satisfaction with the response and requested the IRM to close the complaint. The IRM closed the complaint on 20 June 2025.

Cases under review - handling function to be determined

5

In 2025, the IRM assessed five cases to determine the appropriate handling function. These cases originated from Côte d'Ivoire, Lesotho, Tunisia, and Uganda.



Lesotho Highlands Water Project (LHWP) Phase II

Sector(s)	Water
Location / Reference Number	Lesotho / RQ2025/06
Complaint	On 11 September 2025, the IRM received a complaint submitted by elected community representatives of the project-affected people from 18 villages in the Mokhotlong district of Lesotho, through two non-governmental organizations acting as advisors to these representatives. The complainants represent approximately 1,600 people, mainly from rural communities, who rely on pastoralism and agriculture. The complaint is related to social and environmental issues, as well as human rights violations.

Project: In October 2021, the AfDB approved a loan to South Africa's Trans-Caledon Tunnel Authority (TCTA) for Phase II of the Lesotho Highlands Water Project, co-financed by the New Development Bank, with the South African government. AfDB financing supports the Polihali Dam and Transfer Tunnel, with TCTA as borrower and the government as guarantor. Phase II is under implementation, jointly managed by authorities in Lesotho and South Africa, with completion expected by 2030. The project aims to secure water supply for South Africa's Gauteng Region while supporting Lesotho's socio-economic development through improved infrastructure and expanded hydropower potential, notably by increasing water transfers from Lesotho to South Africa.

Actions/Results: In October 2025, the IRM received additional information enabling it to consider the complaint complete and admissible for registration. The IRM registered the complaint on 21 October 2025, and the Management response was received on 19 November 2025. The document was shared with the complainants for review, and their comments were received on 12 December 2025.

Next step: In January 2026, IRM will review the comments and hold a meeting with complainants and their advisors to discuss the way forward.



Wastewater Treatment Plants (WWTPs) under Tunisia's Small Cities Sanitation Programme - Phase I (PAPC-I), Tunisia

Sector(s)	Water and sanitation
Location / Reference Number	Tunisia / RQ2025/05
Complaint	The IRM received three complaints filed by a group of residents of Menzel Hayet (Monastir) and Karkar (Mahdia) on 7 July 2025, by a group of mining concessionaires on 1 August 2025 and by a salt production company on 11 August 2025, respectively. The complainants' concerns relate to environmental risks, lack of prior consultations and potential major negative socio-economic impacts that will arise if the project is implemented at the current proposed location.

Project: In October 2018, the AfDB approved a loan to the Tunisian Sanitation Office (ONAS) and a Rural Water Supply and Sanitation Initiative (RWSSI) grant to the Government of Tunisia to finance Phase I of the Small Cities Sanitation Programme, targeting wastewater infrastructure in towns with fewer than 10,000 inhabitants. Phase I covers 33 communes in 19 governorates, aims to address health and environmental needs by 2030, and will benefit about 190,000 people. The co-financers are EBRD, the RWSSI Fund and the Tunisian government.

Actions/Results: These three complaints, which raise similar concerns and relate to the same project, were consolidated into a single case in accordance with paragraph 33 of the IRM Rules, and registered on 17 October 2025. The Management response was received on 17 November 2025 and shared with the complainants for their comments.

Next step: In 2026, once the comments have been received, the IRM will discuss with the complainants to agree on the next step.



Abidjan Urban Transport (AUTP): Development of the Y4 Ring Highway Riviera Palmeraie - Saint Viateur, Côte d'Ivoire

Sector(s)	Transport
Location / Reference Number	Côte d'Ivoire / RQ2025/03
Complaint	On 4 February 2025, the IRM received a complaint submitted by the owner of a plot of land located in Cocody - Riviera Palmeraie, in Abidjan related to compensation, land and property damage issues.

Project: In December 2016, the Board of Directors of the AfDB approved the Abidjan Urban Tramsport Project (AUTP) in two phases to improve urban mobility, reduce congestion, and enhance road safety in Abidjan through upgraded transport infrastructure. The first phase financed the construction of the 4th Bridge linking Yopougon to Plateau, while the second phase supported road interchanges, road extensions, and traffic-light rehabilitation. The co-financers are the Japan International Cooperation Agency, the Global Environment Facility and the Government of Côte d'Ivoire.

Actions/Results: The IRM registered the complaint on 10 June 2025, after receiving additional information on the complaint on 17 April 2025. The Management response was received on 9 September 2025. Management found all four allegations in the complaint to be well-founded. Corrective measures were proposed by Bank management, and an Action Plan was developed jointly with the Abidjan Urban Transport Project (AUTP) coordination unit to address the issues raised. In November 2025, the IRM submitted a request to Management for an update on the implementation of the corrective measures and was waiting for management feedback at the end of December 2025.



Kapchorwa-Suam-Kitale and Eldoret Bypass Roads Project, Uganda

Sector(s)	Transport
Location / Reference Number	Uganda / RQ2025/01
Complaint	On 3 December 2024, the IRM received a complaint submitted by a Ugandan citizen on behalf of communities in the Kapchorwa, Kween, and Bukwo districts, concerning issues related to compensation, land tenure, loss of livelihoods, property damage, and health risks associated with emissions.

Project : In March 2017, the AfDB Boards approved the multinational Uganda–Kenya Kapchorwa–Suam–Endebess–Kitale–Eldoret Bypass Roads Project, financing road upgrades on both sides of the border through ADB and ADF loans. The project involves upgrading 73 km of road in Uganda and 77 km in Kenya, including rehabilitation works and construction of the Eldoret bypass. It strengthens cross-border connectivity via the Suam border post, supports regional integration within the East African Community and Great Lakes Region, and contributes to socio-economic development and poverty reduction.

Actions/Results: The IRM registered the complaint on 12 February 2025 after receiving additional information on 19 January 2025 and 3 February 2025 which enabled it to consider the complaint complete and eligible for registration. Management response was received on 5 May 2025. Bank Management largely acknowledged the issues raised and proposed a detailed action plan for implementation by the Borrower. The IRM shared the Management response with the complainant for comments. Despite several reminders, the complainant did not respond. In November 2025, the IRM contacted the complainant with a proposal to schedule a meeting to discuss next steps; the complainant requested additional time before proceeding. As of the end of December 2025, the IRM was still awaiting the complainant's response.



Development of the Y4 Ring Highway under the Abidjan Urban Transport Project (AUTP) Lot4_PK8, Côte d'Ivoire

Sector(s)	Transport
Location / Reference Number	Côte d'Ivoire / RQ2024/06
Complaint	On 17 July 2024, the IRM received a complaint from an individual who alleged that his property together with those of his neighbours located in Lot 4_PK8. The complaint related to flooding issues, lack of compensation, degradation of ecosystem, inadequate consultations, property damage.

Project: In December 2016, the Board of Directors of the AfDB approved the Abidjan Urban Tramsport Project (AUTP) in two phases to improve urban mobility, reduce congestion, and enhance road safety in Abidjan through upgraded transport infrastructure. The first phase financed the construction of the 4th Bridge linking Yopougon to Plateau, while the second phase supported road interchanges, road extensions, and traffic-light rehabilitation. The co-financers are the Japan International Cooperation Agency, the Global Environment Facility and the Government of Côte d'Ivoire.

Actions/Results: The IRM registered the complaint on 10 December 2024 and received the Management response to the complaint on 5 February 2025. Management response indicated that the flooding is not related to the project and considers the complainant's allegations as unfounded. The document was shared with the complainant for comments and the IRM received the comments on 8 March 2025. In December 2025, the IRM began the process of hiring an expert to provide independent analysis of the situation on the ground, which will guide the IRM decision on the next steps.

Communications and Outreach

Communication

In 2025, the Independent Recourse Mechanism (IRM) advanced its communications and outreach work in preparation for the implementation of a new three-year draft Communications Strategy (2026–2028) in 2026. The draft Strategy was developed around three complementary objectives: empowering Project-Affected People (PAPs), supporting accountability and institutional learning within the Bank, and contributing to the Bank's reputation as a trusted development partner. Communications efforts in 2025 focused on testing approaches, strengthening foundational tools, and achieving an appropriate balance across these three priorities.

Supporting Accountability and Learning Across the Bank

In 2025, the IRM strengthened its internal communications and learning efforts with Bank staff, recognizing their critical role in ensuring awareness of and access to the recourse mechanism. These efforts included a hybrid awareness-raising event held in June 2025, which brought together approximately 60 participants from across sectors and country offices. The session aimed to deepen Bank staff understanding of the IRM's mandate, processes, and value in supporting sustainable project implementation.

Furthermore, the IRM participated in five onboarding/induction sessions organized by HR for new staff members joining the Bank.

Building on this engagement, and mindful of the demand for flexible learning formats, the IRM collaborated with colleagues from the Department of Impact and Results (SNDR) in September 2025 to develop a stand-alone e-learning course on the Bank's PERCIPIO platform.



The IRM participated in the Bank's 2025 Annual Meeting held from 26 to 30 May 2025 in Abidjan, Cote d'Ivoire. The IRM Acting Director and team held several side meetings with stakeholders, including a discussion on safeguarding the IRM Policy Review with the UK Foreign, Commonwealth & Development Office (FCDO). Regarding ongoing cases, they met two representatives of a Senegalese Civil Society Organisation, Lumière, Synergie pour le développement (LSD) to discuss complaint updates; and the representatives of project-affected people alleging violations of the Bank's environmental and social policies on the Lakes Edward and Albert water resources project complaint (LEAF II) and the Wadalai irrigation project complaint, both in Uganda.

The IRM also participated in the Bank's Civil Society Forum held on 8 May 2025 in Abidjan. The IRM's presence at the Forum reflects the African Development Bank's broader commitment to integrating accountability and civil society engagement throughout its project lifecycle.

Helping to Maintain the Bank's Reputation as a Trusted Development Partner

Communication and outreach are widely recognized by stakeholders as one of the most critical areas for value creation. In this context, the IRM's communications work in 2025 prioritized transparency, data integrity, and clarity, with a view to strengthening trust and reinforcing the Bank's credibility as a responsible development partner. During the year, particular attention was paid to improving the accuracy, consistency, and visual presentation of data related to complaint cases. The IRM enhanced its public communications through timely updates on case management information on its website. These efforts contributed to clearer public reporting on IRM activities and outcomes, supporting informed stakeholder engagement and reinforcing confidence in the accountability framework.

Outreach and Capacity Building

Building the capacity of our stakeholders (Civil Society Organisations, Project Implementation Units, Bank staff and external mediators), is one of IRM's core objectives, enabling them to engage effectively in the IRM complaint handling processes and contribute to sustainable outcomes.

In 2025, our in-person and online initiatives engaged approximately 1514 individuals from 32 African countries.

During 2025, the IRM participated in several capacity-building efforts to strengthen the capacity of its stakeholders in supporting effective engagement, transparency, and accountability of its complaint handling processes. Through targeted training sessions and knowledge-sharing initiatives, IRM enhanced stakeholders' understanding of its mandate, procedures, and standards and complaint handling processes. These efforts contributed to more informed participation, improved collaboration, and strengthened ownership among stakeholders.



Empowering Civil Society Organizations in Dispute Resolution

The IRM familiarized and improved the mediation skills and practice in the context of the independent accountability mechanisms of 15 mediators for the North Africa region. The training took place in Hammamet, Tunisia from 13 to 17 May 2025 and was organized by the IRM in partnership with the Compliance Advisor Ombudsman of the International Finance Corporation and European Investment Bank's Complaints Mechanism.

Empowering Civil Society Organizations in Dispute Resolution.

The IRM strengthened the capacity of over 25 Civil Society Organizations from Cameroon, Ethiopia, Eswatini, Kenya, Lesotho, Malawi, Rwanda, South Africa, Tanzania, Uganda, and Zimbabwe to engage meaningfully in dispute resolution mechanisms of development finance institutions, particularly in the context of environmental and social grievances arising from projects funded by the Bank Group. The workshop, held 11-12 June 2025, was jointly organized by the IRM and Dispute Resolution Service of the World Bank Accountability Mechanism.



The IRM participated in the 22nd Independent Accountability Mechanisms Network Annual Meeting (IAMnet)

IAMnet's 2025 Annual Meeting, held in Barbados in October 2025, was an opportunity for the IRM to foster interaction with accountability mechanisms from around the world. The IRM team actively participated in a session with Civil Society Organizations and held in-person meetings with representatives of other Independent Recourse Mechanisms to discuss issues related to complaints arising from co-financed projects by their parent institutions and exchanged international best practices and lessons learned on policy reviews.



IRM Acting Director Mariam Diawara (left), and Principal Compliance Officer, Birima Fall (right), at the IAMnet Annual Meeting 2025.

Raising awareness of the IRM mandate

The IRM presented participated in virtual and in-person training workshops 13 African countries, organised by the AfDB's Environmental and Social Safeguards and Compliance Department (SNSC). The workshops cantered on environmental and social safeguards for project implementation units.



IRM Acting Director Mariam Diawara (right), presents certificates of participation in the capacity building session, Arusha, Tanzania.

Empowering Project-Affected People (PAPs)

Responding to feedback from the Boards' Committee on Operations and Development Effectiveness (CODE) on the importance of reaching project-affected people in vernacular languages, the IRM launched an initiative to develop accessible, community-focused communication materials. This included the production of an animated awareness video designed for both community radio broadcasting and social media dissemination.

By the end of 2025, audio recordings of the core IRM message had been completed in eight languages, significantly expanding the potential reach of IRM information at the community level. Work was ongoing to finalize the animated video component, which will be rolled out in 2026. This initiative reflects the IRM's continued commitment to reducing linguistic and information barriers to access the IRM, particularly for vulnerable and remote communities.

2025 Social Media

During 2025, the IRM continued with events-related and general information posts in English and French, while planning to leverage stakeholder networks during outreach missions in 2026.

	Dec. 2023	Dec. 2024	Dec. 2025
Facebook	18	57	52
LinkedIn	718	1,507	1781
Instagram	90	187	153
'X'	186	387	207
You Tube	12	29	19

Other Activities in 2025



Establishment of an IRM Roster of Technical Experts

Following consultation with the Bank procurement department, the IRM re-launched the recruitment process for the IRM Roster in April 2025. Submission of expression of interests closed in May 2025 and the IRM embarked on preparing a long list and short list of candidates who met the requirements. Interviews were held and concluded in December 2025. In the first quarter of 2026, the IRM will notify the successful candidates of their selection to join the IRM Roster. The IRM will also hold an induction session of the Roster members. The Roster will be operational by the end of quarter 1 of 2026.



Board Approval to Launch the Fourth Review of the IRM

In accordance with the IRM Rules, the performance of the IRM should be reviewed on a quadrennial basis to ensure the relevance and effectiveness of the mechanism. In 2025, the IRM initiated preparations for the fourth Review by developing the Concept Note of the fourth Review and the Terms of Reference (TOR) for the recruitment of a consultancy firm to conduct the review. The budget was submitted to CODE for endorsement then to Boards for consideration and were approved in December 2025. In quarter 1 of 2026, the IRM will launch the recruitment of a consultancy firm to conduct the review through a competitive international bidding process.



Knowledge Product & Advisory Services

Occupational Safety and Health

An external consultant was recruited in October 2025 to review the draft Advisory Note on "Preventing, Mitigating and Responding to Occupational Safety and Health Risks within AfDB-funded Operations" (OSH Advisory Note). This is work in progress and the IRM will complete it in 2026.

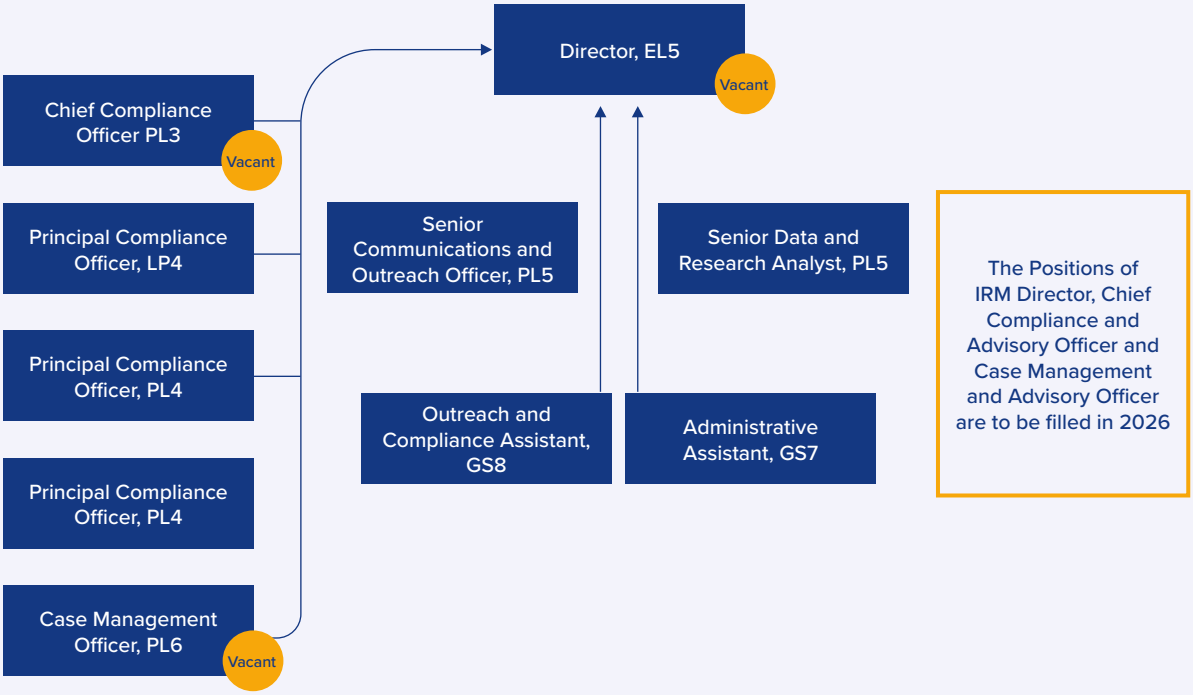


Our Resources

The IRM's effectiveness is anchored in its diverse and high-performing workforce, enabling transparent, accessible, and accountable engagement with stakeholders. Continuous learning and a collaborative, safe, and supportive work environment remain central to our approach. The team has earned the trust of stakeholders through the values it upholds, including accessibility, accountability, and transparency.

Staffing

In 2025, the IRM was comprised of 7 staff members and an Acting Director. The vacant positions in 2024 of Senior Data and Research Analyst and Senior Communications and Outreach Officer were filled in January 2025 and June 2025 respectively.



Building Capacity of our Staff

In 2025, IRM staff embraced dynamic learning and development opportunities, strengthening their skills and expertise to drive greater transparency, accountability, and impact in their work.

As part of its staff capacity-building, skills and professional development, 4 IRM staff members attended the following training courses.

Mediation Training: In February 2025, three IRM staff participated in a training course on "Advanced Training on Company-Community Mediation in Complex Environments" in Washington DC. The training was organized by the Independent Accountability Mechanism (IAM) of the U.S. Development Finance Corporation (DFC) in collaboration with the Compliance Advisor Ombudsman (CAO) of the International Finance Corporation (IFC). The training was attended by 22 participants from seven IAMs and two civil society organizations. The IRM staff improved their understanding and assessing stakeholders and issues in a dispute; designing and managing entry into a complex system with a collaborative mindset; facilitating interest-based agreements within a rights-based framework; and designing durable relationships, management and agreement monitoring strategies.

IAM's Talent Academy: One IRM staff member participated in the 2nd IAMnet Mediation Training for Non-Mediators from 23–25 June 2025 at the European Bank for Reconstruction and Development (EBRD) Headquarters in London. Organized by EBRD's Independent Project Accountability Mechanism (IPAM), the training provided foundational knowledge of mediation, particularly for company-community disputes, and emphasized collaboration with mediation professionals. IRM's participation supported its capacity-building and peer-learning goals within the network, allowing sharing of experiences and best practices with other independent accountability mechanisms from major multilateral development banks, including the Asian Development Bank, the International Finance Corporation, the World Bank, the Inter American Development Bank, the German Investment and Development Company, the Dutch Entrepreneurial Development Bank, Proparco and the Green Climate Fund.

Leadership Training: One IRM staff member was selected to participate in the Emerging Leaders Program from May to July 2025, a training offered by the Organization for Economic Cooperation and Development (OECD) in collaboration with Headsprings. The training consisted of six online sessions and four days of in-person training at OECD's Headquarters in Paris, France. The staff member acquired management and leadership skills in the context of international financial institutions, including leading change, operational excellence and growth mindset and values in decision-making.

Budget Execution and Procurement

In 2025, the overall budget execution was 96% after the readjustments. The budget execution was firmly related to activity execution. The budget was mostly consumed by complaint handling (98%) and outreach and communication (91%). Expenses on complaint handling expenses were mostly related to consultancy (100%), mission (100%) for investigation and meeting with complainants (93%). Outreach and Communications costs were related to consultancy for production of IRM institutional reports and communications material (video, tools and gadgets) and activities. Commitments not fully completed were carried forward to 2026.

Deliverables	Approved budget (a)	Adjusted 2025 (b)	Carryover to 2026 (c)	Alloted 2025 (d)	Adjusted Execution Rate (e) = (d)/(b)
Complaints Handling	304 974	146 029	102 692	142 878	98%
Outreach and Communication	82 476	50 441	4 399	45 832	91%
Relevance and Effectiveness	135 000	_	_	_	_
Institutional Learning	102 660	_	7 496	_	_
Administrative Activities	10 056	_	_	_	_
Capacity Development	3 635	_	_	_	_
Total	**638 800**	**196 471**	**114 587**	**188 710**	**96%**

2026 and Beyond – Focus Areas for the IRM

The Annual Report is an opportunity to consider how we can continue to build on the knowledge gained through the implementation of our activities in outreach, our engagement with stakeholders, and the handling of cases. Ultimately, our goal is to enhance our processes and practices to achieve greater efficiency and to foster trust among all our stakeholders.

In 2025, the IRM drew on insights generated through its outreach activities, engagement with stakeholders, and the handling of cases to reflect on what is working well and where further strengthening is needed. This reflection has helped clarify how the IRM can enhance its role, sharpen its impact, and better respond to the evolving accountability landscape.

Looking to 2026 and beyond, our focus is on refining processes, improving efficiency, and deepening trust among all stakeholders. The priority areas outlined below represent where the IRM sees the greatest opportunity to consolidate gains, address emerging challenges, and continue advancing accountability in practice.

Fourth Review of the IRM

The 4th review of the IRM will enable the IRM take stock of what has worked well since the last review that was completed in July 2021, and what need improvement. It will present an opportunity for the IRM to refine its processes aimed at improving its efficiency, improving accessibility of the PAPs to the mechanism to ensure that the IRM remains an effective recourse mechanism for people affected by a project or an operation funded by the AfDB and a useful accountability instrument to the Bank.

Operationalisation of the IRM Management Action Plans System (IRM MAPS)

The IRM MAPS is an online system for tracking Bank management's implementation of Boards' approved management action plans responding to IRM recommendations in compliance review reports approved by the Boards of Directors. In 2025, due to internal staff constraints in the IRM, the operationalization of the IRM MAPS was temporarily halted as the available staff focused on handling ongoing and new complaints. In December 2025, the IRM recruited a consultant, who among other assignments, will assist the IRM to make the IRM MAPS operational in 2026. The consultant will work together with IRM staff including the data analyst and the case management officer to make the IRM MAPS operational.

Making IRM Internal Data Tools Operational

IRM is planning to deploy the first version of its data management tool in 2026. The tool consists of an application to collect and manage data and a dashboard to display insights, trends and alerts. The project started mid 2025 with a clear identification of data needs and the design of data dictionary. The first prototype of the application was available at the end of 2025. The prototype will be tested and go live with the dashboard in 2026.

Improving Access and Information about the IRM

Efforts in 2025 to build an audio-visual tool for outreach in multiple languages spoken in AfDB project areas will translate into campaigns in 2026 to disseminate the messages on social media. The IRM will also leverage the popularity of community radios, particularly in rural areas where internet access is limited and vernacular languages are the main channels to convey of community-related information. To achieve maximum impact, the IRM will create a virtuous cycle during outreach missions to regional member countries by inviting community radios to participate in audio recordings and deliver their pre-recorded messages on their airwaves.

Lessons Learned from Complaints Handling

This section draws on the IRM's experience in handling complaints in 2025 to identify recurring patterns in Bank Group–financed operations and to synthesize key lessons from practice. By examining issues raised through both problem-solving and compliance review processes, the IRM highlights where challenges most frequently emerge, as well as opportunities to strengthen project design, implementation, and engagement with affected communities. The trends and lessons outlined below reflect insights gained through direct interaction with project-affected people, borrowers, and Bank counterparts during the year, and are intended to inform continuous learning and improvement across the accountability ecosystem.

1. The Bank project teams should be more involved in problem solving cases even though the Bank is not an active party in a problem-solving exercise. This is because agreements in problem-solving exercise should comply with the Bank standards and in addition, the Bank can also help its clients and borrowers in the problem-solving process.

2. The IRM has observed a growing trend in the preparation of Management Action Plans (MAPs) in response to recommendations contained in Compliance Review Reports, where a number of the proposed actions are to be implemented directly by Borrowers or private-sector clients. While this may be appropriate from an operational perspective, it has important implications for accountability. The IRM's mandate is to monitor the implementation of the Boards-approved MAP, not separate borrower action plans. It is therefore essential that, before a MAP is submitted to the Boards for consideration, Bank Management ensures that borrowers or clients have formally agreed to carry out the actions assigned to them, including adherence to specified timelines and deliverables. Following Board approval of the MAP, Bank Management retains the responsibility for overseeing and ensuring that borrowers or clients effectively implement the agreed measures in accordance with the approved timelines. Clear confirmation of borrower commitment at the outset, coupled with sustained supervision thereafter, is critical to ensure that corrective actions are implemented and that intended remedies for Project-Affected People are delivered in practice.

3. There are instances where the Borrower and the complainants do not agree on procedural actions to be taken when the borrower is implementing the Boards' approved Management action plan. In such cases, the Boards of Directors should provide guidance to management on the way forward to avoid wastage of time and resources for both the borrower and Bank project team, who supervise the implementation of the management action plan.

4. The Bank should ensure that the borrowers/clients carry out meaningful (free, prior informed) and transparent consultations with the affected communities, including women. Stakeholder engagement should be maintained throughout the project's cycle, especially during project preparation, to ensure that the stakeholders are well informed about the project.

Challenges for the AfDB in the Implementation of Environmental and Social Policies

In 2025, the main challenges faced by the AfDB in ensuring effective implementation of its environmental and social policies and procedures were:

1. Ensuring fair and timely compensation:
Where asset valuations are conducted several years before compensation is paid, the amount disbursed should reflect the market value of assets and properties at the time of payment, not at the time of valuation. Delayed compensation based on outdated valuations can result in additional economic losses for PAPs.

2. Proactive disclosure of project information:
The Bank should ensure that key project documents — including environmental and social impact assessments and environmental and social management plans — are disclosed in a timely and accessible manner, in line with its operational safeguards and the Disclosure and Access to Information Policy (2012). Transparent disclosure strengthens stakeholder engagement and informed decision-making.

3. Strengthening socio-economic assessments and livelihood restoration:
Borrowers should carry out comprehensive socio-economic assessments of anticipated project impacts and design appropriate mitigation and livelihood restoration measures in consultation with affected communities. Livelihood restoration should be treated as a substantive development commitment, not merely a procedural requirement.

4. Operationalising project-level grievance redress mechanisms (GRMs):
Although GRMs are often formally established, they frequently remain ineffective due to inadequate training and limited capacity. The Bank should ensure that GRMs are properly resourced, that members are trained early, and that these mechanisms function effectively as the first line of accountability.



Appendices

APPENDIX 1 - DATA SUMMARY

SECTION	DATA POINT	2023	2024	2025
Governance	Percentage of recommendations stemming from the Third Policy Review that were completed or in progress	70%	94%	97%
Governance/ Stakeholder Engagement	Number of members in SAC	10	9	9
Stakeholder Engagement	Number of stakeholders in our database	991	1 271	1 300
Performance	Number of new complaints registered (number received)	4 (14)	6 (35)	9 (29)
Performance	Total active cases	18	23	25
Performance	Number of complaints received since inception of IRM in 2006 (number registered)	145(31)	180(37)	209 (46)*
Performance	Complaints registered by the IRM for every 100 projects approved by the Boards	1	1.1	1.35
Performance	Average number of days to complete Compliance Review (CR) and Problem Solving (PS) complaints	CR 362 PS 534	CR 362 PS 510	CR 362 PS 510
Performance	Percentage of registered complaints where complainants requested confidentiality for fear of retaliation	60%	50%	17%
Communications and Outreach	Approximate number of people (and countries) reached by the IRM	900 (18)	650 (23)	1514 (32)
People	Number of staff (at year-end)	9	9 (Sept) 7 (by Dec)	7 (May) 8 (by Dec))
People	Gender Representation (at year-end)	60% female, 40% male	60% female, 40% male (Sept) 71% female, 29% male (by Dec)	71.4% female 28.6% male (June) 75% female 25% male (by Dec)
People	Number of African-based languages spoken by the team by year-end	14	13	11

*3 complaints related to the same project and raising similar issues were combined and registered as one complaint (Tunisia case) and 2 other complaints relating to the same project were combined and registered as one Complaint (Senegal case).

APPENDIX 2 - 2025 STAKEHOLDER ENGAGEMENT

STAKEHOLDER	KEY ENGAGEMENT ACTIVITIES 2025
Independent Accountability Mechanisms	• Physical participation in the 22nd IAMnet Annual Meeting • Meetings with the heads of Washington-based Independent Accountability Mechanisms (MICI, CAO, Inspection Panel and Dispute resolution Service)
AfDB	• Physical participation in the AfDB Annual Meeting and organisation of information sessions • Organisation of a hybrid session to sensitize staff on the IRM and its mandate • Consultations with Bank Management to exchange views and clarify findings and recommendations on Compliance Review Reports • Shared information on the complaint's mechanism at the AfDB Civil Society Organizations Forum • Presented the complaints mechanism at sessions of the AfDB's Onboarding/Induction for New Staff Members • Presented the complaints mechanism at sessions of the AfDB Environmental & Safeguards Department activities with Project Implementation Units (PIUs)
External partners EIB/ CAO/ DRS	Organised IAMs Joint East Africa Outreach Workshop for CSOs and a Mediation Capacity-Building Workshop for anglophone CSOs in East, Central & North Africa
IRM Stakeholder Advisory Council	Organisation of the statutory meeting of the Stakeholder Advisory Council (SAC)
Other stakeholders in contact with Project Affected People	Communicated closely on the ground and virtually with complainants, CSOs and PIUs throughout the complaints-handling process

APPENDIX 3 - IRM REGISTER OF UNREGISTERED COMPLAINTS
(JANUARY TO DECEMBER 2025)

NO	DATE RECEIVED	COUNTRY	PROJECT	ISSUES	REASON FOR NON-REGISTRATION
19	18/12/2025	Kenya	Construction Works for Kitui Matuu Last Mile Water and Sanitation Project	Non-payment of a supplier	Does not fall within IRM mandate. Forwarded to Management of Regional Office for East Africa to handle
18	21/11/2025	Somalia	Sheerbi–Dhahar–Hingalool Road Project	PAP requesting information on the completion of the project	Does not fall within IRM mandate. Forwarded Management of the Regional Office for East Africa and the Manager of Somalia to handle
17	14/11/2025	Ghana	Ghana-Strengthening Institutional Capacity for Domestic Resource Mobilization and Economic Management	Allegations of corruption	Does not fall within IRM mandate. Forwarded to the Integrity and Anti-corruption Office to handle
16	20/10/2025	Democratic Republic of Congo	Project for the Support of Alternative Well-Being for Children and Youth in Cobalt Mines (PABEA-COBALT)	Non-payment of salaries of the construction company's staff	Lack of necessary information. Letter forwarded to the DRC Country Manager for consideration
15	25/08/2025	Niger	Road improvement and enhancement project Hamdara-Wacha-Dungass road, Nigeria border Lots 1 and 2	Request for intervention	Incomplete. IRM is awaiting further information from the complainant to determine the eligbility of the complaint
14	07/07/2025	Côte d'Ivoire	Singrobo-Ahouaty Hydroelectric Dam Project	Climate Whistleblowers (CW): complaint on environmental destruction, lack of compensation measures, social impacts, and non compliance with AfDB commitments	Unregistered, as the complainant later withdrew the complaint, indicating that they would resubmit it at a later date
13	07/07/2025	Senegal	Climate Change Project for Communities and Ecosystems in Sahelian River Basins (RACE-Sahel)	Complaint regarding the exclusion of IUCN from the process of the RACE project, which they drafted	Does not fall within IRM mandate. Forwarded to the Director General of the Regional Office for West Africa to handle
12	17/07/2025	Togo	Projet PASIG-1 (Gabon)	Claim following the late cancellation of a contracting	Does not fall within IRM mandate. Forwarded the Procurement department to handle
11	02/07/2025	Democatic Republic of Congo	Projet PABEA-COBALT	Non-payment of salary for nine months.	Discussions with the complainant did not establish any documented link to the company. The complaint has been referred to the Congo Office for consideration
10	30/06/2025	Senegal	Senegal Cities Modernization Program - PROMOVILLES	Alert on serious Irregularities Hindering the Effective Implementation of PROMOVILLES	Forwarded to the Integrity and Anti-Corruption Office as it related to denunciation of irregularities and corruption
9	24/06/2025	Nigeria	N/A	Request for Intervention on Outstanding Consultancy Payment – SHIP ESIA and BMWMP	Complaint related to procurement issues, therefore forwarded to Procurement department

NO	DATE RECEIVED	COUNTRY	PROJECT	ISSUES	REASON FOR NON-REGISTRATION
8	16/06/2025	Senegal	Dakar/Tivaouane/ Saint-Louis Highway Construction Project	Relocation of the primary school, disregard for the site proposed by the community, compensation issues, isolation of the village	Following discussions with the complainant, the IRM was informed that the authorities have resolved the situation; the complaint has therefore been withdrawn
7	16/06/2025	Cote d'Ivoire	Abidjan Urban Transport Project	illegal evictions, poor stakeholder engagement, community retaliation, no effective grievance mechanism.	The IRM is still awaiting the requested additional information from the complainants prior to registration
6	11/06/2025	Namibia	Katima Mulilo Water Supply Scheme Namibia	Issues related to bidding/ procurement	Complaint related to procurement issues. Therefore, forwarded to Procurement department to handle
5	04/03/2025	Cameroon	ENABLE Youth Cameroun (EYC), Projet de Développement de la Chaîne de Valeur Agricole (PD-CVA).	Unpaid intern training funds, non-respect of contractual obligations and financial loss for his company.	Complaint was forwarded to Management and Coordinator of the project within the Bank to handle
4	17/02/2025	Kenya	Nairobi Rivers Basin Rehabilitation and Restoration Programme: Sewerage Improvement Project Phase 2	Members of Kariobangi Sewage Farmers Self Help Group were forcefully and unlawfully evicted from a piece of land they had acquired title deed occupied since 1996	The complaint is ineligible as the reported harm is unrelated to the Bank's financing of the project
3	03/02/2025	Uganda	Uganda - Jinja Expressway (Kje Project)	Allegation related to compensation of populations impacted	Following exchanges with Management, it was confirmed that no eviction was planned, and no evidence of eviction was provided by the complainants. Therefore, the complaint could not be substantiated
2	18/01/2025	Cameroon	Agricultural Value Chain Development Project	Unfair dismissal and request for settlement of a dispute between the complainant and the Project	After analysis, file forwarded to Director general of Central Africa of the Bank to handle
1	02/01/2025	Kenya	Mombasa – Mtwapa Road Project	Reported corruption on the site	Complaint related to corruption issued does fall within IRM mandate. Therefore, forwarded to the Integrity and Anti-corruption office to handle

Independent Recourse Mechanism (IRM)
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