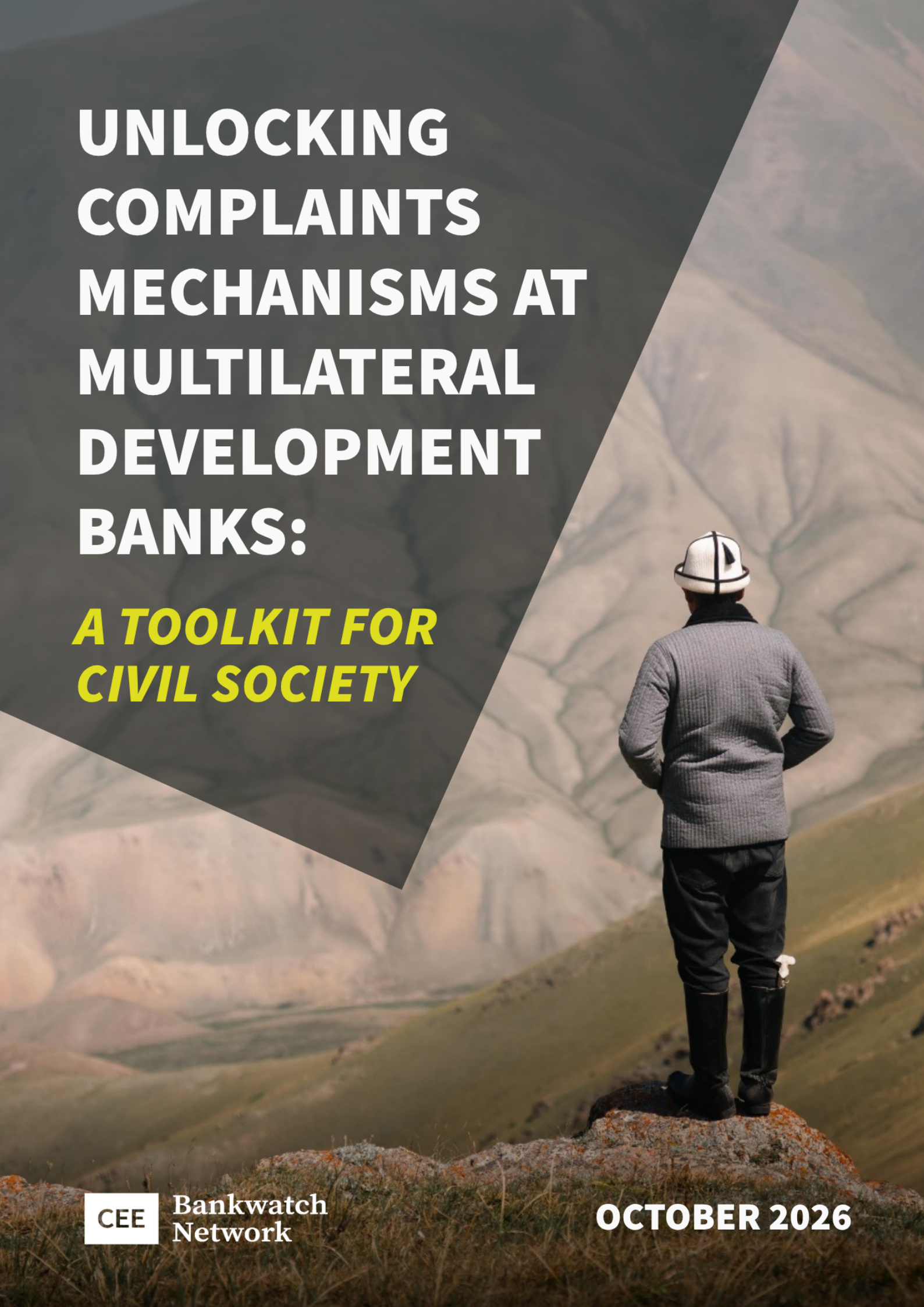
# UNLOCKING COMPLAINTS MECHANISMS AT MULTILATERAL DEVELOPMENT BANKS:

## *A TOOLKIT FOR CIVIL SOCIETY*



CEE Bankwatch Network

OCTOBER 2026

CEE Bankwatch Network

Multilateral development banks (MDBs) finance roads, energy systems, water infrastructure, urban transport, housing, agribusiness, financial intermediaries and other projects that can affect people's land, homes, livelihoods, health, environment and access to public services. These institutions include the World Bank Group, the European Bank for Reconstruction and Development (EBRD), the European Investment Bank (EIB), the Asian Development Bank (ADB), the Asian Infrastructure Investment Bank (AIIB) and other regional development banks.

Development projects and programmes can have far-reaching impacts on the lives of ordinary people. Infrastructure projects such as dams, roads and pipelines may displace or resettle whole communities, destroy local cultural and sacred sites, damage the environment and violate rights to land and development. When an MDB-financed project breaches the bank's policies or procedures, affected people and communities can make their voices heard and seek redress.



## What are safeguard policies?

MDB safeguard policies, which include environmental and social frameworks and environmental and social policies, set out rules for how projects should identify, avoid, reduce and manage risks to communities and the environment. These rules usually cover issues such as land acquisition, involuntary resettlement, indigenous peoples, biodiversity, pollution, labour, community health and safety, stakeholder engagement, gender-based violence risks and access to information.

## What can affected people and communities do if an MDB-financed project causes harm?

When an MDB-financed project causes or is likely to cause harm, affected people and communities are not limited to raising concerns only with the project company or national authorities. Most major MDBs now have independent accountability mechanisms. These mechanisms receive complaints from individuals, communities or their representatives when an MDB-financed project may have failed to comply with the MDB's environmental, social, disclosure or consultation standards.

## What are independent accountability mechanisms?

Independent accountability mechanisms are bodies established at MDBs in response to global demands for greater justice, accountability and transparency. The World Bank was the first to establish its Inspection Panel in 1993, followed shortly afterwards by regional development banks and other financial institutions. While independent accountability mechanisms vary in scope, administration and outcomes, their mandates are broadly similar: to provide recourse for people affected by MDB-funded projects when relevant social and environmental policies have not been properly applied or complied with.

## When should affected people and communities use a complaints mechanism?

When people's rights are violated by destructive or unjust development projects, they need a way to denounce these harms, find solutions and hold the responsible institutions to account. A complaints mechanism can be used when affected people and communities have concerns about issues such as involuntary resettlement, inadequate compensation, damage to homes or land, pollution, loss of access to water or pasture, unsafe construction, impacts on biodiversity, exclusion from consultation, lack of information, labour abuses, retaliation, or harm to cultural or sacred sites.

It's important to remember, however, that independent accountability mechanisms are not courts. They generally cannot cancel a project, impose criminal penalties or directly award compensation. Their value lies elsewhere: they can create an official record of harm, trigger an independent review, require MDB management to respond, support mediation between communities and project sponsors, and increase pressure for corrective action.



## How do affected people prove a complaint and collect evidence?

A complaint brought by affected people or communities should explain how a project has harmed, or is likely to harm, people or the environment. Identifying the specific safeguard(s) or policy provision(s) that may have been breached is useful, but not always necessary.

Before submitting a complaint, complainants should demonstrate that they have tried – and been unable – to resolve the problem directly with the given MDB project team. All relevant documentation should be retained: land titles, lease agreements, compensation records, maps, tax records, utility bills, agricultural records, medical records, school records, employment documents, and statements from local authorities. Letters to project sponsors and MDBs, meeting notes, footage, testimonies, and photos all help demonstrate that concerns were raised with the relevant MDB(s). It's also worth recording dates, the names of institutions and individuals contacted, promises made, and whether these promises were kept.

For projects that have already been completed, project impacts should be identified and documented. If a project is only in its initial stage of design or implementation, complainants should document the likely impacts on the community. Evidence should be collected clearly, safely and in an organised way. It should show what harm has been caused, who has been affected, when it happened, and how it relates to the MDB-financed project. Evidence should be stored securely. Where there is a risk of retaliation, names, addresses, signatures, faces and sensitive documents should not be shared publicly.

## What remedy can be requested?

A formal complaint shouldn't only describe the harm caused. It should also explain what would help repair or reduce the harm. This is called remedy. Remedy can include compensation, restoration of livelihoods, replacement of land, repair of damaged houses, improved access to water or pasture, pollution clean-up, health support, new consultations, project redesign, suspension of harmful activities, or independent monitoring.

As noted above, MDB complaints mechanisms are not courts and typically do not award compensation directly. Their role is to assess whether the MDB has followed its own standards, support problem-solving, and seek corrective action by the MDB or its client. Even where a mechanism finds non-compliance, affected people and communities may still need to monitor whether the agreed or promised actions are implemented.

**Practical tip:** Every complaint should include a short section entitled 'Remedy requested'. It should be specific and realistic.



## How should a complaint be submitted?

Before filing a complaint, affected people and communities should first attempt to raise the problem with the project-level grievance mechanism, the borrower or client, and the MDB project team. Most MDBs generally expect complainants to raise their concerns with the MDB project team first.

A representative of the affected people or communities – such as a lawyer, authorised representative or civil society organisation – can submit a complaint on their behalf.

Most MDB independent accountability mechanisms provide complaint forms on their websites. These forms help complainants cover the basic information needed to assess a complaint – project name, location, harm caused or feared, people affected, previous attempts to resolve the problem, any request for confidentiality, and any retaliation risks. Using the form is helpful, but not mandatory: a complaint can also be submitted by email or letter, as long as it includes all necessary information.

Complaints generally cannot be submitted anonymously, but complainants can request that the accountability mechanism keep their identity confidential.

## Before filing a complaint: Quick checklist

| | |
|---|---|
| ✓ Identify the MDB financing the project | ✓ Record previous steps taken with the client, authorities, grievance mechanism or MDB staff |
| ✓ Confirm the project name, location, borrower or client | ✓ Decide whether to request problem-solving, a compliance review or both |
| ✓ Describe what happened, when it happened and who is affected | ✓ Name the representatives who will communicate with the mechanism |
| ✓ Explain how the harm is linked to the project | ✓ Include a clear 'Remedy requested' section |
| ✓ Collect and organise evidence | |

**Practical tip:** Keep the complaint factual, specific and focused on harm. Avoid broad political statements unless directly linked to the project's environmental or social impacts.

## Where should a complaint be sent?

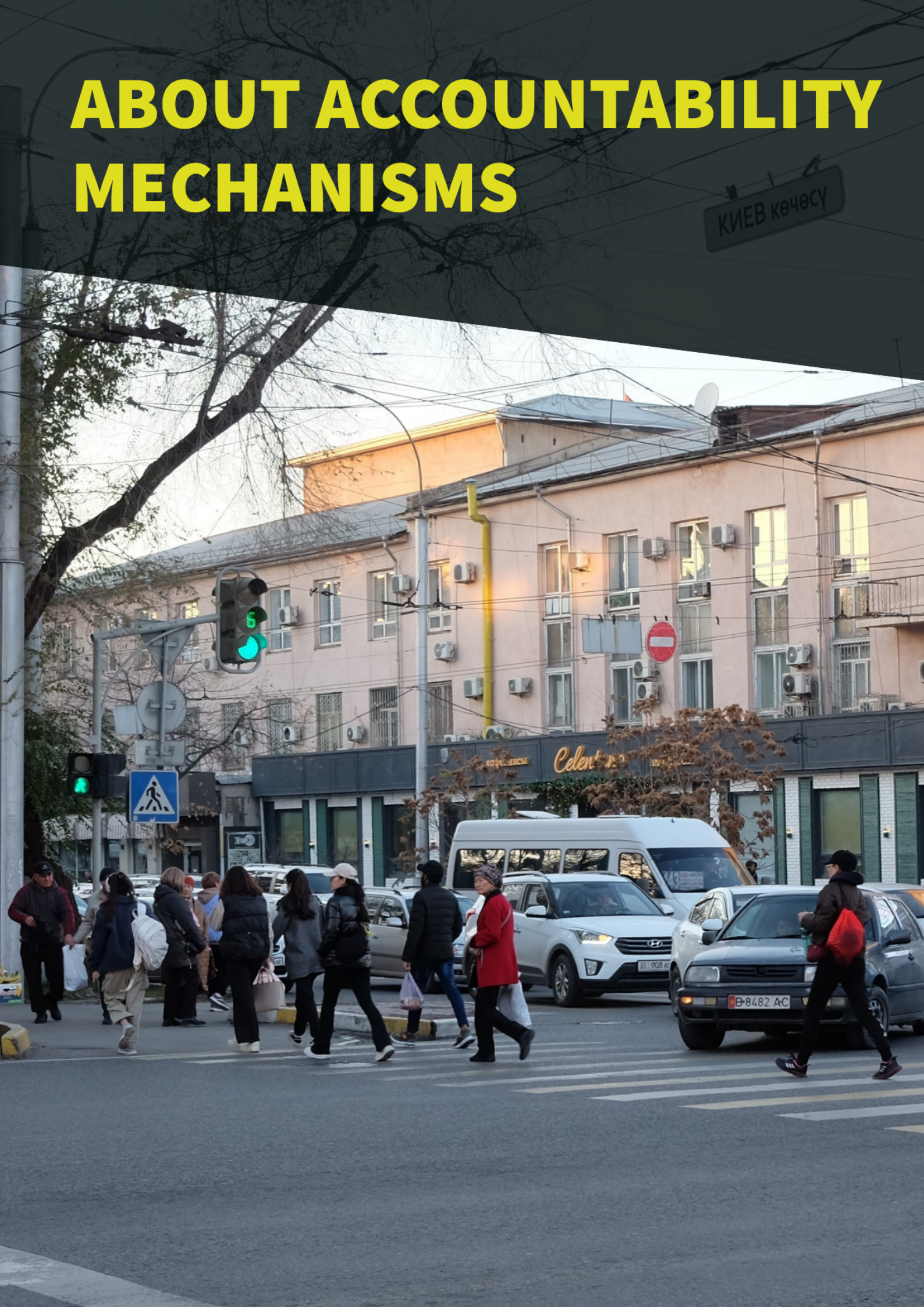
Complaints should be sent to the accountability mechanism of the MDB financing the project or programme in question. Read the relevant MDB's website carefully for information on the accountability mechanism and how and where to send complaints.

## Where to send complaints

| Mechanism | Contact |
|---|---|
| **World Bank Inspection Panel** | ipanel@worldbank.org \| https://www.inspectionpanel.org/ |
| **World Bank Accountability Mechanism** | accountability@worldbank.org \| https://accountability.worldbank.org |
| **World Bank Grievance Redress Service (GRS)*** | grievances@worldbank.org \| https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service |
| **IFC/MIGA Compliance Advisor Ombudsman (CAO)** | CAO@worldbankgroup.org \| https://www.cao-ombudsman.org/ |
| **EBRD Independent Project Accountability Mechanism (IPAM)** | ipam@ebrd.com \| https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism.html |
| **EIB Group Complaints Mechanism** | complaints@eib.org \| https://www.eib.org/en/about/accountability/complaints/what-we-do/index |
| **ADB Accountability Mechanism** | amcro@adb.org \| https://www.adb.org/who-we-are/accountability-mechanism |
| **AIIB Project-affected People's Mechanism (PPM)** | ppm@aiib.org \| https://www.aiib.org/en/about-aiib/who-we-are/project-affected-peoples-mechanism/how-we-assist-you/ |

*Management grievance redress channel, not an independent accountability mechanism

# ABOUT ACCOUNTABILITY MECHANISMS



## Problem-solving and dispute resolution

Some MDB accountability mechanisms offer a problem-solving or dispute resolution function. This is different from a compliance review.

A compliance review evaluates whether the MDB followed its own environmental, social, disclosure or safeguard policies. Problem-solving focuses on dialogue between affected people and communities, the borrower, the project company and other relevant parties. The aim is to reach a practical agreement that addresses the harm or risk.

Problem-solving is usually voluntary. It can only work if the affected people and the project sponsor agree to participate. The mechanism typically acts as a neutral facilitator or mediator – it does not decide who is right or wrong, and does not assess whether the MDB has complied with its policies.

Problem-solving may be useful when affected people and communities want a negotiated solution, such as revised compensation, better access to land or water, new consultations, construction changes, livelihood restoration, pollution controls, safety measures, or a timetable for corrective action. It may be less useful when trust is lacking, the other party refuses to negotiate, retaliation is a serious risk, or the main objective is to establish whether the MDB violated its own policies.

Where both options exist, complainants should decide whether to request problem-solving, a compliance review or both. Some mechanisms first assess the complaint and then help the parties choose the most suitable route.

The World Bank Accountability Mechanism includes the Inspection Panel and the Dispute Resolution Service (DRS). The DRS was established in 2020 to provide a voluntary and independent dispute resolution option for requesters and borrowers in the context of requests for inspection.

The Office of the Compliance Advisor Ombudsman (CAO) is the independent accountability mechanism for the International Finance Corporation (IFC) and the Multilateral Investment Guarantee Agency (MIGA), which are both part of the World Bank Group. The CAO provides a dispute resolution function, which it describes as an independent forum where communities and companies address concerns together and seek joint solutions, with support from dispute resolution specialists and local mediators.

The EBRD's Independent Project Accountability Mechanism (IPAM) offers both compliance and problem-solving functions. The problem-solving function supports voluntary dialogue between complainants and clients to resolve environmental, social and public disclosure concerns without attributing blame or fault. IPAM acts as a third-party facilitator and uses flexible, consensus-based approaches.

If a complaint cannot be resolved through problem-solving, complainants can request a compliance review in most cases.

## Retaliation and confidentiality

People who complain about MDB-financed projects may face pressure, threats, loss of employment, surveillance, legal intimidation, violence or other forms of retaliation. Some MDBs and accountability mechanisms also assess whether civic space conditions, restrictions on civil society, or risks to human rights defenders may prevent affected people and communities from safely accessing grievance or accountability mechanisms. These risks should be assessed before any complaint is submitted.

Affected people should carefully consider whether names, locations, signatures, photos or community details could expose them to harm.

Most mechanisms state that they do not tolerate retaliation against complainants, representatives, witnesses or others connected to a complaint. They also allow complainants to request confidentiality. This means the mechanism may know the complainants' identities, but names and identifying details should not be disclosed publicly or to project stakeholders without consent.

Retaliation risks should be described clearly in the complaint. The complaint should explain who may be at risk, why the risk exists, whether threats have already occurred, and what information must remain confidential. The EBRD's IPAM states that it does not tolerate retaliation against complainants or others involved in the IPAM process, and its complaint form directly asks whether complainants fear retaliation and whether information should be treated confidentially.



**Practical tip:** Don't publish names or sensitive information before deciding on a safety strategy. Where the risk is high, affected people should seek advice from trusted civil society organisations before filing.

## Management action plans

A management action plan is the MDB management's formal response after a compliance review identifies failures or recommends corrective actions. It usually sets out what the MDB, borrower or client will do, who is responsible, and when these actions should be completed.

The accountability mechanism monitors whether the actions agreed in the management action plan are actually implemented. This may involve reviewing progress reports, consulting complainants, speaking with MDB staff and the project client, visiting the project area, and publishing monitoring updates.

Management action plans matter because a finding of non-compliance alone does not repair harm. The management action plan is what moves the complaint process from investigation to implementation. Affected people should therefore review the plan carefully and scrutinise whether it includes clear deadlines, a budget, responsible parties, monitoring arrangements, and measures that address the harm.

A weak management action plan may promise only further studies, training, or future engagement. A stronger plan identifies concrete steps such as revised compensation, livelihood restoration, additional environmental controls, new consultations, disclosure of documents, or independent monitoring.

Practical tip: After an investigation, affected people and communities should continue to engage by tracking the management action plan, submitting updates, documenting whether actions are implemented, and challenging measures that fail to address the original harm.



## Project-level grievance mechanisms

The environmental and social policies of the World Bank, EBRD, EIB, ADB and AIIB generally require projects to have project-level grievance mechanisms so that affected people and communities can raise concerns early and directly with the borrower, client or promoter. These mechanisms should be accessible, free of charge, understandable, timely, inclusive, and safe from intimidation or retaliation. These mechanisms are designed to receive and address complaints about project impacts, such as land acquisition, compensation, construction damage, pollution, safety risks, labour issues, consultation failures, or loss of livelihoods.

Although project-level grievance mechanisms are not intended to replace MDBs' independent accountability mechanisms, they remain important: MDBs are expected to assess whether project-level mechanisms exist and function properly. Where a project-level grievance mechanism is absent, unsafe or ineffective, this gap can itself serve as a basis for a complaint to an MDB's independent accountability mechanism.

## Fraud and corruption concerns in MDB-financed projects

Most MDBs have separate integrity or anti-corruption units that review allegations of fraud, corruption, collusion, coercion, obstruction, misuse of funds, conflicts of interest or other prohibited practices in MDB-financed projects, contracts or activities.

These integrity offices are different from accountability mechanisms. Accountability mechanisms typically deal with harm to people or the environment caused by a project and possible non-compliance with environmental and social standards. Integrity offices deal with misconduct, corruption risks and misuse of project resources.

Reports may usually be submitted by affected people, workers, contractors, civil society organisations or any person with relevant information. Where there is a risk of retaliation, complainants should consider requesting confidentiality or using anonymous reporting options where available.

| MDB | Office/unit | Contact | What to report |
|---|---|---|---|
| World Bank Group, including IBRD, IDA, IFC and MIGA | Integrity Vice Presidency (INT) | Use the online complaint form to submit your concerns: https://wbgcmsprod.microsoftcrmportals.com/en-US/anonymous-users/int-fraud-management/create-new-complaint/ | Suspected fraud or corruption in World Bank Group-financed projects, contracts, vendors, staff or activities |
| EBRD | Office of the Chief Compliance Officer (OCCO) | whistleblowing@ebrd.com | Fraud, corruption, prohibited practices or staff misconduct related to EBRD-financed projects or EBRD assets |
| ADB | Office of Anticorruption and Integrity (OAI) | integrity@adb.org<br>anticorruption@adb.org | Fraud, corruption, coercion, collusion, abuse, conflicts of interest or obstruction in ADB-related activities |
| EIB Group | Fraud Investigations Division | investigations@eib.org | Fraud, corruption or other prohibited conduct affecting EIB Group operations |
| AIIB | Complaints-resolution, Evaluation and Integrity Unit (CEIU) | complaints@aiib.org | Suspected fraud, corruption or prohibited practices in AIIB projects, contracts or activities |

# OVERVIEW OF MDB ACCOUNTABILITY MECHANISMS



### World Bank Accountability Mechanism and Inspection Panel

The World Bank Accountability Mechanism applies to projects financed by the International Bank for Reconstruction and Development (IBRD) and the International Development Association (IDA). It includes the Inspection Panel and the Dispute Resolution Service (DRS). The Inspection Panel is an independent, impartial and non-judicial body that reviews whether the World Bank complies with its own operational, environmental and social policies. Affected people may submit a 'request for inspection' when they believe a World Bank-financed project has caused, or may cause, harm because the World Bank failed to follow its rules. Where appropriate, the Accountability Mechanism may also offer dispute resolution if the affected people and borrower agree to participate.

The World Bank also operates a management-level channel called the Grievance Redress Service (GRS), which allows affected people and communities to raise concerns directly with the World Bank when they believe an IBRD- or IDA-financed project has caused, or may cause, harm. It is intended to help ensure that grievances are reviewed and addressed by World Bank management. Complaints to the GRS can be sent to grievances@worldbank.org. Please note that this is not an independent accountability mechanism.

### IFC/MIGA Compliance Advisor Ombudsman

The Compliance Advisor Ombudsman (CAO) is the independent accountability mechanism for the International Finance Corporation (IFC) and the Multilateral Investment Guarantee Agency (MIGA), the private-sector and guarantee arms of the World Bank Group. CAO receives complaints from people who believe they are affected by IFC- or MIGA-supported projects. It has three main roles: dispute resolution, compliance, and advisory work. Through dispute resolution, CAO can help communities and companies seek negotiated solutions. Through compliance, it reviews whether IFC or MIGA applied their environmental and social requirements properly. CAO can also monitor actions taken in response to compliance findings.

### EBRD Independent Project Accountability Mechanism

The European Bank for Reconstruction and Development (EBRD)'s Independent Project Accountability Mechanism (IPAM), which replaced the former Project Complaint Mechanism, handles complaints related to environmental, social and public disclosure issues linked to EBRD-financed projects. Individuals, groups or civil society organisations may submit complaints if they believe they have been, or are likely to be, harmed by an EBRD-financed project. IPAM operates under the Project Accountability Policy. It can support dialogue between complainants and the client through problem-solving, or carry out a compliance review to assess whether the EBRD followed its Environmental and Social Policy and Access to Information Policy.

## EIB Group Complaints Mechanism

Under its new policy, which applies to complaints submitted from 1 October 2026, the EIB Group Complaints Mechanism – the Group's independent accountability mechanism – handles complaints about the environmental and social impacts of EIB Group projects and about access to information. It also aims to facilitate access to remedy. It can help the parties resolve issues through dispute resolution, or carry out a compliance review to assess whether the EIB Group has followed its own policies, which may lead to findings and recommendations. Complainants who are not satisfied with the outcome can file a complaint with the European Ombudsman in certain circumstances.

## ADB Accountability Mechanism

The Asian Development Bank (ADB) Accountability Mechanism is an independent mechanism open to people affected by ADB-assisted projects. It has two main functions. The Office of the Special Project Facilitator supports problem-solving, helping affected people, borrowers, and project stakeholders seek practical solutions. The Compliance Review Panel reviews whether ADB complied with its own operational policies and procedures, including safeguard requirements. The ADB generally treats the mechanism as a last resort process. This means affected people and communities are expected to first try resolving their concerns through project-level or ADB operational channels where possible.

## AIIB Project-affected People's Mechanism

The Asian Infrastructure Investment Bank (AIIB)'s independent accountability mechanism is called the Project-affected People's Mechanism (PPM). It is open to people who believe they have been, or are likely to be, adversely affected by AIIB's failure to implement its Environmental and Social Policy. The PPM is independent of AIIB management and reports directly to the Board. It serves as a channel for project-affected people once their concerns have not been resolved through project-level grievance mechanisms or AIIB management processes.



## Conclusion

MDB accountability mechanisms are imperfect, but they remain important tools for people affected by development finance. They give affected people and communities a way to make their concerns visible at the international level, compel MDBs to examine whether their own standards were followed, and create pressure for corrective action. But they work best combined with organisational and legal support, media engagement, expert evidence and persistent follow-up.

## Contact us

If you have questions about this toolkit or would like advice on preparing a complaint, contact CEE Bankwatch Network at centralasia@bankwatch.org.

## Additional resources

- The Accountability Toolkit
- A Community Guide to Independent Accountability Mechanisms: A guide for communities in Africa
- How to interact with development banks lending to hydropower projects in Central Asia: A toolkit for civil society activists

Co-funded by the European Union

This publication is co-funded by the European Union. Its contents are the sole responsibility of Bankwatch and do not necessarily reflect the views of the European Union.

