DFI Transparency Initiative

Driving transparency for better development results

ESG AND ACCOUNTABILITY TO COMMUNITIES

Workstream 3 Working Paper

February 2021

Publish What You Fund

The Global Campaign for Aid Transparency

#DFITransparency

Version 1.2, last updated 16 Feb 2021

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Publish What You Fund wishes to thank those who contributed to the research, interviews and feedback, including the multi-stakeholder Expert Working Group.

Contents

Boxes, figures, graphs and tables

Introduction

WHY TRANSPARENCY OF ENVIRONMENT, SOCIAL AND GOVERNANCE (ESG) AND ACCOUNTABILITY MATTER

This report assesses the transparency of environmental and social (E&S) policies[1] and disclosure of development finance institutions (DFIs) and, where relevant, their independent accountability mechanisms (IAMs).[2] The report is based on the third work stream of Publish What You Fund's DFI Transparency Initiative. The first work stream of the initiative focused on the transparency of basic project information, the report from which can be found here. The second work stream assessed the transparency of impact management. The report can be found here.

DFIs are intended to have positive development impacts but in many cases their projects pose significant environmental and social risks, including environmental degradation, involuntary resettlement, threats to cultural heritage, and damage or degradation of resources owned or controlled by indigenous populations. In line with the broad expectation that DFIs operate in a sustainable and responsible manner, it is critical that they be fully transparent about these risks and share plans to minimise or mitigate them.

Broadly speaking, shareholders agree on this principle, and while there are debates about when and in what format information should be conveyed, it is standard practice for DFIs to have policies to identify the highest risk projects and a set of guidelines to ensure that the risk assessments and potential mitigating measures are effectively disseminated to stakeholders, especially project affected communities. However, as we discuss in this report, disclosure requirements and the implementation of these requirements vary significantly.

In the event that DFIs fail to adhere to or enforce their E&S policies, it is also important that stakeholders know what options there are for recourse. This can include, for example, grievance mechanisms put in place by the DFI or its client. For the major multilateral development banks, which disburse billions of dollars annually to finance high risk projects (primarily in infrastructure), complainants can appeal to IAMs, which are responsible for investigating such complaints and, when deemed appropriate, proposing remedial action. For IAMs to function effectively it is imperative that their presence be widely disclosed, both on DFI websites and directly to project affected communities. In addition, stakeholders should have timely access to all relevant findings.

RESEARCH QUESTIONS

This report seeks to answer the following research questions:

1. How transparent are DFI policies regarding ESG safeguarding and accountability?
2. How and to what extent do DFIs disclose the ESG risks, management and mitigation of their activities?
3. How and to what extent do DFIs disclose the presence, findings and recommendations of independent accountability mechanisms?

1 While our workstream is about the transparency of ESG, the majority of policies by DFIs are centred on E&S.
2 The analysis for this report has been limited to the direct investments made by DFIs. We recognise that lending through financial intermediaries (FIs) represents a large and growing component of total DFI activity and that FI lending has serious transparency deficits. The Publish What You Fund DFI Transparency Initiative will be assessing FIs in depth in the future in workstream 5.

OVERVIEW OF KEY FINDINGS

The report includes the following findings:

- Most DFIs (especially the multilaterals) have transparent and fairly sophisticated policies that govern the application of ESG safeguards, and are relatively easy to access, although there are some notable exceptions. A combination of DFI access to information (or disclosure) policies and specific E&S standards provide guidance on how ESG risks and risk management activities should be disclosed. However, there is significant latitude on policy implementation requirements among DFIs. For example, some DFIs have policies that affirm that disclosure should take place in a timely fashion, but do not define what is timely. This lack of clarity creates scope for significant variation in disclosure patterns within DFIs and makes it difficult to hold them to account.

- Evidence of global disclosure (i.e., how E&S information is broadly disclosed and disseminated by DFIs) at the project level was mixed.[3] Broadly, there is significantly more transparency from multilateral DFIs than from bilateral DFIs, many of which do not disclose any meaningful E&S information at project level.

- Global disclosure was slightly higher for high risk (Category A) projects than for medium/low risk (Category B) projects. However, despite multilateral development banks (MDB) guidelines requiring E&S disclosure of high risk projects, we found a number of examples of projects without systematic disclosure which appears to be in violation of their own policies or implementation guidelines.

- Unlike our previous report on the transparency of impact management, we did not find significant differences in the transparency practices of sovereign and non-sovereign DFIs (or portfolios). In the case of DFIs that undertake sovereign and non-sovereign activities (i.e., the MDBs), the same E&S policies typically applied to both portfolios, although there are exceptions (e.g., the International Finance Corporation (IFC) and the World Bank have distinct policy regimes and separate accountability mechanisms).

- We found limited evidence that DFIs provide assurance of community disclosure (i.e., confirm publicly that they and their clients met disclosure requirements). In some cases, DFIs provided information on the date, place and method of community disclosure but this was not normally done in a systematic manner. Assurance of community disclosure was more common for high risk (Category A) projects than for medium/low risk (Category B) projects, reflecting the fact that assurance is commonly found in stakeholder engagement plans.

- Similarly, DFIs did not directly communicate to affected communities that options for recourse such as IAMs are available to them. While policy governing global disclosure of IAMs is transparent and coherent, DFIs typically do not require their clients to disclose their existence to affected communities, or commit to doing so themselves.

- Because DFIs do not confirm that disclosure requirements of E&S and accountability measures have been met, we could not reasonably assess the extent of the gap between E&S policy requirements and their implementation. Even allowing for the fact that assurance of disclosure would always be limited (for example, we would have no way of judging if meetings were held in an environment free of intimidation or coercion), the failure to systematically confirm that meaningful community disclosure has occurred is problematic.

3 For the purposes of this analysis "global disclosure" signifies disclosure by a DFI on the internet, typically via their own website while "community disclosure" signifies local disclosure of information to project affected communities by the DFI or its client.

- Most DFIs make a determination as to whether a project is high risk and, as such, subject to the full suite of E&S guidelines. These are often ranked Category A, B, and C. We initially sought to examine disclosure for Categories A and B but unfortunately in a number of instances, DFIs did not disclose categorisation. This resulted in our analysis of Category A projects being limited to DFIs which disclose project categorisation.

STRUCTURE OF REPORT

The rest of the report is structured as follows. Section 2 presents our methodology, including a discussion of the consultation process that informed the creation of our framework of analysis and how we conducted the landscape analysis. Section 3 discusses the findings of the landscape analysis. Section 4 expands on a number of thematic issues that emerged during stakeholder interviews and further research including the respective responsibilities of DFIs and their clients, the scale of the gap between E&S disclosure policy and implementation, and the lack of clarity and specificity of DFI policies.

Methodology

This section of the paper explains how we constructed our framework of analysis and conducted our research. The first section reviews the consultation we undertook to inform the framework for our landscape analysis of the transparency of ESG and accountability of DFI operations. The second section describes how we analysed the extent to which DFIs offer assurances of community disclosure of ESG risks and promote awareness of IAMs. The third section provides a brief overview of the methods used to inform our research. Finally, the fourth section offers some methodological considerations.

CIVIL SOCIETY ORGANISATION (CSO) CONSULTATION AND CONSTRUCTION OF FRAMEWORK OF ANALYSIS

The need for consultation

For previous workstreams in this project, Publish What You Fund relied heavily on readily accessible sources of information (e.g., websites, project documents and annual reports). For this workstream we realised at the outset that we could not effectively assess transparency of ESG risks without some input from affected communities (where disclosure needs to take place). Such an undertaking is beyond the resources or capabilities of Publish What You Fund's DFI Transparency Initiative, as it would require in-country project monitoring over a significant period. In addition, because the numbers, composition, location, concerns and experiences of these communities vary widely, even regular access to some affected communities would not enable us to extrapolate broadly from our findings.

In light of this, we sought to gather information indirectly by consulting with CSOs that have a long history of working with and representing project affected communities, often at the grassroots level. This process provided insight into their experiences and concerns. While this effort is clearly not a proxy for all affected communities, it did lead us to design a framework that takes into account the transparency requirements of project affected communities. This framework was then discussed with a multi-stakeholder Expert Working Group and adapted as appropriate.

Consultation process

The consultation was conducted by an external consultant working alongside Publish What You Fund's researchers. The first phase of the consultation reviewed relevant literature and initiatives related to the transparency and accountability of DFIs, with a particular focus on ESG and IAMs. This included research and reports from organisations such as the Centre for Research on Multinational Corporations (SOMO), Recourse, Oxfam and the International Accountability Project, and initiatives such as the Early Warning System. This research informed the development of a first draft of our framework of analysis that we then disseminated to a group of CSOs for comment.

The second phase of the consultation consisted of semi-structured interviews with staff from 13 CSOs involved in the transparency and accountability space. The interviews were used as an opportunity to present our draft framework for feedback and to better understand their perspectives on DFI transparency and accountability for ESG issues. The results of our consultation and how that informed our framework are described below.

Key findings

Our consultation highlighted the following key findings:

- DFI policies generally affirm that project affected communities have a right to information regarding projects that will impact them. But CSOs reported persistent evidence of inadequate stakeholder engagement, including inadequate disclosure. This shortcoming reflects a combination of insufficiently clear E&S policies and weaknesses in implementation when the policies are clear.
- At most DFIs, implementation is a top-down exercise that does not allow for adequate community engagement (e.g., there is often a lack of meaningful consultation in how E&S risks could most appropriately be managed/mitigated).
- DFIs often rely primarily on web-based disclosure of project information that is often inaccessible to project affected communities. Furthermore, the types of information that are disclosed are often unsuitable. For example, documents are rarely disclosed in local languages and/or are written in a manner that is too technical for meaningful engagement with non-specialists.

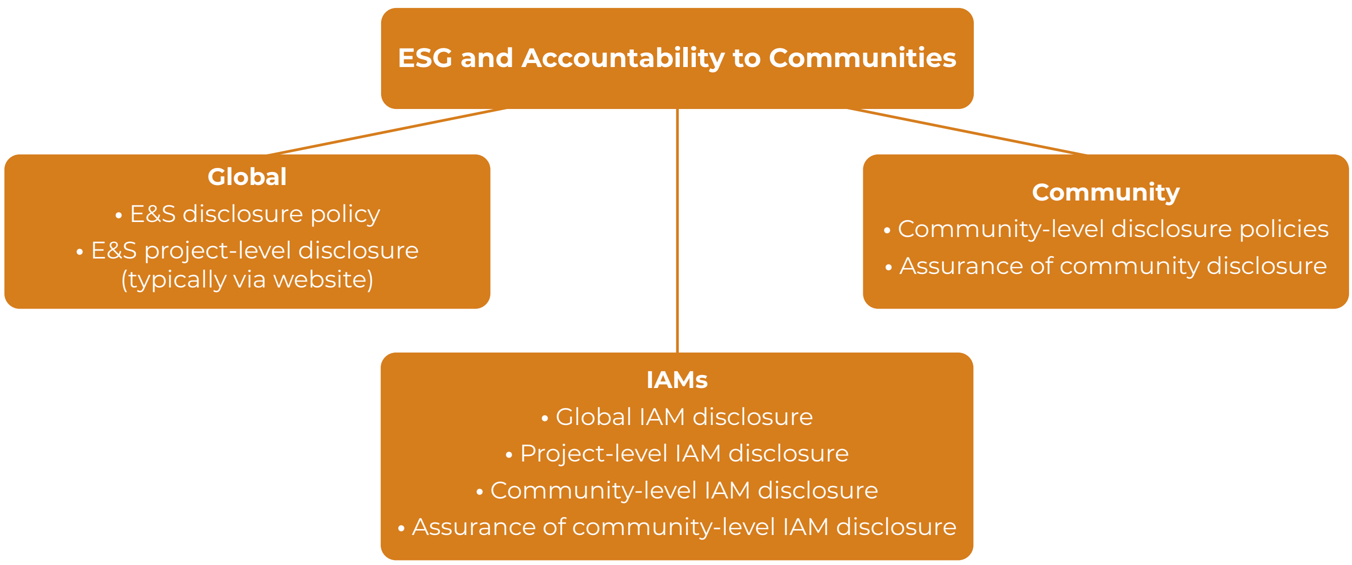
Many of the above issues are reflected in the findings of the landscape analysis that follows.

GLOBAL AND COMMUNITY DISCLOSURE

Our report examines ESG and accountability disclosure at two levels: global and community.

- Global disclosure denotes the generalised disclosure of ESG and accountability information at both the policy and project levels. This disclosure is typically governed by access to information or transparency policies and normally occurs via the DFI's own website.
- Community disclosure denotes disclosure practices to inform project affected communities about a project. This form of disclosure is often governed by E&S frameworks or standards. The responsibility for community disclosure may lie with the investment client (non-sovereign) or project implementing agency (sovereign) rather than directly with the DFI.

FIGURE 1: ESG and IAM disclosure: global and community levels



THE CHALLENGE OF ANALYSING COMMUNITY DISCLOSURE

How do we measure community disclosure?

Our consultation process highlighted two major gaps in the disclosure of ESG risks and accountability. The first is a gap between policy and actual disclosure at the DFI level (e.g., public disclosure on websites) and the second is a gap between policy and actual disclosure of information to project affected communities.

With this in mind, and as a reflection of further discussions that we have held with stakeholders (see Section 4.4 on the "DFI–client relationship") we identified the question of *disclosure assurance* as a metric worth analysing.

What do we mean by disclosure assurance?

To find assurances of disclosure we sought evidence that the DFI and/or their client met the requirements for engaging with project affected communities (e.g., indicated ***when, where and how*** community disclosure took place, and ***what documentation*** was disclosed). In practice, this meant surveying project pages of DFI activities via their databases and reading the various E&S documentation that was attached (where available).

Although some DFIs make high risk investments contingent on meaningful disclosure taking place by clients to communities, we found that DFIs policy requirements are extremely limited with respect to assurance of this disclosure actually taking place.

Furthermore, there are numerous examples of IAMs cases which claim that community disclosure did not take place in an adequate manner.[4] Without assurance of community disclosure from DFIs it is impossible for stakeholders to have any sense whether or not DFIs are enforcing their own policies.

However, as shown in the box below, there are occasions where DFIs provide detailed assurance of community disclosure for projects. Furthermore, as discussed in Section 4.4, where clients are responsible for community disclosure, DFI policies make investments contingent on meaningful disclosure taking place. If the DFI's role is one of due diligence rather than direct disclosure it is reasonable to expect that DFIs hold evidence of community disclosure and disclose it.

4 See for example https://aconsole-static.s3.amazonaws.com/media/public/cases/Mundra-CRPFinalReport-7Apr2015.pdf and https://www.afdb.org/fileadmin/uploads/afdb/Documents/Compliance-Review/Sendou_Coal_Fired_Power_Plant_Compliance_Review_Report_Eng.pdf (p.32).

CASE STUDY: RENOVATION OF THE FRANCISCO MORAZÁN HYDROPOWER PLANT, HONDURAS – INTER-AMERICAN DEVELOPMENT BANK (IADB)

In October 2020, the IADB approved an $18 million loan to renovate the largest hydropower plant in Honduras. It was designated as a Category B project (medium risk). As such, the IADB was required to release an environmental and social assessment and environmental and social management plan and the Honduran government was required to consult with local stakeholders during the pre-approval phase.

Details of the consultations were recorded in a consultation report (in Spanish) disclosed on the project webpage, providing assurance of what took place. Below are some key details on the consultations taken from the report:

Who:

The Honduran authorities conducted separate stakeholder consultation meetings with representatives of community organisations, local government, organisations present in the area and employees of the hydropower plant. The report reveals that four representatives of the communities attended: three males and one female.

When:

There were seven stakeholder consultation meetings in total, two of which were with representatives of community organisations. These two took place on June 3rd 2020 at 2.00–3.30pm and 3.40–4.50pm.

Where:

The meetings were held virtually because of the Covid-19 pandemic and resultant restrictions at the time. The two meetings with community representatives were via WhatsApp video calls, while another four meetings were held via Zoom, and there was one in-person meeting with the employees.

How:

The meetings were conducted with representatives of the national electrical power company, IADB and the tourism centre of the hydropower plant, among others. The report includes verification of the meetings with evidence including: list of participants, photos of the meeting and minutes.

What:

The consultations were accompanied with information that was sent to participants before the meetings and again during. This included: a video presenting information about the project (which was also published on the Facebook page of the tourism centre), the accompanying PowerPoint presentation, separate audio detailing the environmental and social impacts of the project and a report on the consultation process. The report explains that during engagement participants were told that they could find both the environmental and social assessment and environmental and social management plan on the project webpage on IADB's website.

OUR RESEARCH METHODOLOGY

Landscape analysis

The landscape analysis of the transparency of ESG and accountability was informed by a systematic review of published data by bilateral and multilateral DFIs. As shown in Table 1, we selected a sample of 20 bilateral and multilateral DFIs. Among the multilaterals, we included six with a mix of sovereign and non-sovereign operations, three with non-sovereign portfolios only and three with sovereign portfolios only. Of the eight bilateral DFIs included, all but one support non-sovereign lending only.[5] No bilateral DFIs with exclusively sovereign portfolios were included.

TABLE 1: DFIs selected for landscape analysis

Bilateral DFIs (non-sovereign)	Bilateral DFIs (non-sovereign and sovereign)	Multilateral DFIs (sovereign and non-sovereign)	Multilateral DFIs (exclusively or predominantly sovereign)	Multilateral DFIs (non-sovereign)
CDC Group (UK)	DBSA (South Africa)	African Development Bank (AfDB)	International Development Association (IDA) and the International Bank for Reconstruction and Development (IBRD)[6]	International Finance Corporation (IFC)
DEG (Germany)		Asian Development Bank (AsDB)	Inter-American Development Bank (IADB)	IDB Invest
DFC (USA)		Asian Infrastructure Investment Bank (AIIB)	Islamic Development Bank (IsDB)	Islamic Cooperation for the Development of the Private Sector (ICD)
FMO (Netherlands)		Development Bank of Latin America (CAF)		
Norfund (Norway)		European Bank for Reconstruction and Development (EBRD)		
Proparco (France)		European Investment Bank (EIB)		
Swedfund (Sweden)				

5 Of the bilaterals, all but DBSA finance private sector operations exclusively, although they do not separate out their operations on their website. The MDBs are more evenly divided.

6 IDA and IBRD are both part of the World Bank Group but serve different client groups depending on their level of development and creditworthiness. The key differences between them are their sources of funds and lending terms. For the purposes of this exercise, they are treated as one entity.

We conducted the landscape analysis by surveying available materials on the selected DFI websites at aggregate and project levels. The range and depth of materials varied according to the disclosure practices. Materials surveyed included:

Organisational level

- Access to information and disclosure policies
- E&S safeguard frameworks and standards
- E&S framework interpretation notes
- Access to information annual reviews
- IAMs websites and databases

Project specific

- Project databases – when available we examined the project databases to survey individual investment data.
- Project data sheets of individual investments.
- E&S documentation of individual investments including environmental and social impact assessments (ESIAs), stakeholder engagement plans (SEPs) and E&S management plans.

At the project level we selected a sample of recent projects to assess. We had originally intended to select both Category B (medium risk) and Category A (high risk) projects to capture varying levels of disclosure. However, as discussed below, numerous DFIs which use a risk categorisation system do not disclose the categorisation of their individual investments which made this process complicated. As such, our analysis of Category A projects is limited to those DFIs that disclose the categorisation of their projects. For each DFI, five projects in each available categorisation were selected.

Information from these sources was used to inform our framework and was constructed as an Excel document consisting of four sheets that analyse:

1. Global E&S policy and disclosure
2. Community E&S policy and disclosure
3. Global IAMs policy and disclosure
4. Community IAMs policy and disclosure

For the purposes of this analysis "global disclosure" signifies disclosure by a DFI on the internet, typically via their own website while "community disclosure" signifies local disclosure of information to project affected communities by the DFI or its client.

Disclosure was assessed according to a "traffic light" system where aspects of transparency are marked green, orange and red.

METHODOLOGICAL CONSIDERATIONS

The primary purpose of the landscape analysis and this report is to understand how DFIs approach and disclose ESG safeguards and accountability for direct investments. (See below for discussion of financial intermediaries (FIs)). The landscape analysis was not designed to be scientifically rigorous, but rather to provide a detailed snapshot of current disclosure patterns and provide sufficient insights to generate recommendations to improve transparency of ESG and accountability.

Measures that we are taking to ensure that the reported findings are accurate include:

- Providing segmented sections of the landscape analysis to the relevant DFIs for fact checking. This is an ongoing process and feedback will be integrated into the analysis on an ongoing basis.
- Cross-checking data sources when possible.

A key consideration in completing the landscape analysis alongside interviews is what the threshold should be in assessing levels of transparency and determining a ranking (red, green or orange) for each category in the relevant tables. In some instances, we learned further details about the disclosure of ESG and accountability mechanisms via interviews or private communication with their technical staff. We used this information to inform the broader research but it was excluded from the landscape analysis unless we could confirm it on one or more of the data sources outlined above. This approach reflects our view that information should be readily available to the public rather than via other channels.

This report assesses the transparency of basic project information for DFIs' direct investments only. The report has not analysed the levels of transparency (or lack thereof) of the investments that DFIs make through FIs as they will be addressed in a separate workstream. We recognise that FI lending represents an increasingly large element of the total activity of many DFIs. For example, FI investments represented 55.4% of IFC's total investment portfolio and 52% of CDC's portfolio, while also representing significant portions of portfolios of EIB (45%) and FMO (30%).[7] FI investments are also typically significantly less transparent than direct investments. As such, the findings of this report should be understood to represent only the direct investment sections of the DFI portfolios analysed.

Transparency and the right of access to information

The transparency of DFIs in their disclosure of ESG risks and accountability to communities should be consistent with international conventions affirming citizens' rights of access to information. For example, in Europe, the Aarhus Convention establishes that everyone has the right of access to information on environmental matters held by public bodies.[8] In Latin America the 2018 Escazu Agreement establishes similar rights and is in the process of being ratified by the signatory countries.[9] Meanwhile, in 2019 the Special Rapporteur on Freedom of Expression and Access to Information of the African Commission on Human and People's Rights released the Declaration of Principles on Freedom of Expression and Access to Information in Africa.[10] The Declaration establishes that: "a. Every person has the right to access information held by public bodies and relevant private bodies expeditiously and inexpensively. b. Every person has the right to access information of private bodies that may assist in the exercise or protection of any right expeditiously and inexpensively."

7 C. Donaldson and S. Hawkes, "Open Books: How development finance institutions can be transparent in their financial intermediary lending and why they should be" (Oxfam Briefing Paper, 2018).
8 https://ec.europa.eu/environment/aarhus/
9 https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XXVII-18&chapter=27&clang=_en
10 https://www.achpr.org/public/Document/file/English/Declaration%20of%20Principles%20on%20Freedom%20of%20Expression_ENG_2019.pdf

The right of access to ESG information is a separate (albeit complementary) construct to transparency. The former is arguably more expansive, typically only limited by specific exceptions. Furthermore, in establishing the former as a human right, it arguably shifts the power towards communities in a manner that transparency does not. While a right of access to information is enshrined in laws and conventions, transparency is typically located in internal policies of DFIs which are liable to change. However, with this in mind, there is scope for transparency and the right of access to information to be complementary and mutually reinforcing. While upholding the right of access to information, more comprehensive transparency on the part of DFIs has the potential to pre-empt access to information requests. If DFIs were to systematically disclose all relevant ESG information for their investments or projects they could ensure that rights are respected without need of recourse to requests.

Assessing the Timeliness of Disclosure

The timely disclosure of appropriate project documentation, both to communities directly and on a wider basis, is essential for transparency to be meaningful and for DFIs to be accountable. Our research has assessed the extent to which DFIs have clearly defined policies regarding the timeliness of disclosure of projects and project documentation. However, it was beyond the scope of this project to assess whether or not DFIs adhere to their policies on a project-by-project basis. This is partly due to the inconsistencies in the ways that DFIs report the disclosure dates and approval dates of their projects, and of corresponding documentation. Research from the International Accountability Project[11] and the multi-stakeholder Early Warning System[12] have highlighted the fact that projects are often not disclosed in a timely manner.

11 https://accountabilityproject.org/wp-content/uploads/2021/02/FINAL-In-Practice_-Information-Disclosure-at-FMO.pdf
12 https://ews.rightsindevelopment.org/media-category/idb-invest/

Findings of landscape analysis

GLOBAL DISCLOSURE POLICY

General findings

With some notable exceptions, policies surrounding global disclosure are fairly well developed and transparent across the DFIs sampled for the landscape analysis.

All but three DFIs publicly disclose E&S safeguard policies. Of those three, one does have an access to information policy but it does not include requirements for E&S safeguarding.

Transparency, disclosure and access to information policies

Only half of the bilateral DFIs have publicly available disclosure or access to information policies on E&S safeguards. One recently released a draft transparency policy which was made available for public comment. The draft is no longer available to the public.

Such policies are commonly disclosed by multilateral institutions; only one institution, and its private sector arm, did not have them.

Timeliness and extent of global disclosure

Most DFIs lack clear requirements of the number of days between the disclosure of project information and board approval. Only one bilateral DFI disclosed this information. Timeliness of disclosure is more commonly communicated by multilateral DFIs: four of those reviewed communicate the timeliness of disclosure across risk categories. However, other multilateral organisations do not clearly communicate this information. This result was unexpected. For example, interview respondents stated that DFI-9 requires disclosure either 30 or 60 days prior to board consideration (according to risk categorisation), yet we could not find public communication of this policy.

There is a similar lack of clarity concerning what type of documentation must be disclosed for projects or investments at each risk category. Of the bilateral DFIs, only two provided detailed information regarding what E&S documentation will be disclosed for investments. There is more information from multilaterals with three exceptions.

Environmental and social safeguard standards

Nearly all DFIs disclose what E&S safeguard standards they adhere to, with the exception of three multilateral DFIs. A number of bilateral DFIs use the IFC performance standards.

Translation policies

No bilateral DFIs have a publicly disclosed policy position on the translation of E&S documents into relevant local languages. Of the multilateral DFIs, six have policies regarding the translation of project documents.

TABLE 2: E&S global disclosure policies

Institution	E&S global disclosure: policy (organisational)							
	Does the DFI have a publicly disclosed transparency, access to information or disclosure policy?	Does the DFI clearly define and articulate the number of days between project disclosure and board approval for each risk category?	Does the DFI clearly define and articulate what E&S documentation will be disclosed for investments at each risk category?	Does the DFI disclose what E&S policies/ standards it applies (e.g., IFC performance standards or in-house policies) for its investments?	Does the DFI have a policy on the translation of project documents in to appropriate languages?	Does the DFI disclose an explanation of project risk categorisation?	Does the DFI disclose a list of investment exemptions?	Does the DFI disclose planned monitoring and evaluation of E&S management for its investments?
Bilaterals								
DFI-1	Yes	No	No	Yes	No	Yes	Yes	No
DFI-2	Yes	No	Yes	Yes	No	Yes	Yes	Partial
DFI-3	Yes	No	No	Yes	No	No	Yes	No
DFI-4	No	No	No	Yes	No	No	Yes	No
DFI-5	No	No	No	Yes	No	No	Yes	No
DFI-6	No	No	No	Yes	No	No	Yes	Partial
DFI-7	No	Yes	Yes	Yes	No	Yes	Yes	Partial
DFI-8	Yes	No	No	Yes	No	Yes	Yes	Yes
Multilaterals - Public								
DFI-9	Yes	No	Partial	Yes	Yes	Partial	No	Yes
DFI-10	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
DFI-11	Yes	Partial	Partial	Yes	Yes	Yes	Yes	Yes
DFI-12	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes
DFI-13	Yes	No	Yes	Yes	No	Yes	Yes	No
DFI-14	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes
DFI-15	Yes	No	No	No	No	No	Yes	No
DFI-16	No	No	No	No	No	No	Yes	No
DFI-17	Yes	Yes	No	Yes	Partial	Yes	Yes	Yes
Multilaterals - Private								
DFI-18	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
DFI-10	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
DFI-11	Yes	Partial	Partial	Yes	Yes	Yes	Yes	Yes
DFI-12	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes
DFI-19	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
DFI-14	Yes	No	No	Yes	Yes	Yes	Yes	Yes
DFI-15	Yes	No	No	No	No	No	Yes	No
DFI-20	Yes	No	No	No	No	No	No	No
DFI-17	Yes	Yes	No	Yes	Partial	Yes	Yes	Yes

Explanation of project risk categorisation

Policies and procedures describing project risk categorisation are more commonly disclosed by multilateral DFIs than by bilateral DFIs. Four of the eight bilateral DFIs in the landscape analysis explain the categorisation of projects while the other four do not. All but three multilateral DFIs disclose an explanation of project risk categorisation.

Prohibited investments/projects

All bilateral DFIs and all multilaterals but two have publicly disclosed categories of prohibited investments.

Monitoring and evaluation of project E&S management

E&S risks and requirements do not end with project approval. As such, it is necessary for DFIs or their partners to provide continued monitoring of E&S risks and safeguarding. Planned monitoring and evaluation of the E&S management of projects is more commonly disclosed by multilateral DFIs than by bilateral DFIs. Half of the bilateral DFIs disclose planned monitoring and evaluation while the others do not. All but four multilaterals disclose planned monitoring and evaluation of project E&S management.

COMMUNITY DISCLOSURE POLICY

General findings

For community disclosure policy we looked for information on how DFIs engage with project affected communities both directly and through their investment clients (non-sovereign) or project implementing agencies (sovereign). As with global disclosure policy, we found slightly greater transparency among multilateral DFIs than bilateral DFIs. However, we found no significant difference between multilateral sovereign operations and multilateral non-sovereign operations. In the case of multilateral DFIs that have sovereign and non-sovereign portfolios within the same institution, the same E&S policies appear to govern both operations, with one exception which had separate policy regimes.

Timeliness and extent of community disclosure

No DFI policies on community disclosure include specific timelines for the disclosure of project information to project affected communities. Details about the types of documents that are disclosed to project affected communities is also limited. Of the bilateral DFIs, none disclose what documents are provided to project affected communities. Amongst multilateral five disclose what document disclosure is required at the community level.

Policies on community disclosure

There is widespread disclosure of community disclosure policies. All but one of the bilateral DFIs have publicly available community disclosure policies. Of the multilateral DFIs only three lack community disclosure policies. Some bilateral DFIs use IFC Performance Standard 1 which governs stakeholder engagement for investments/projects at the community level.

Community translation

Most DFIs have policies on the translation of information for project affected communities. Of the bilateral DFIs, all but two have public translation requirements. Several of those use IFC Performance Standard 1, which includes translation guidelines. Amongst multilateral DFIs, all but four have publicly available translation policies.

Free, prior and informed consent

We also assessed whether DFIs have an explicit policy on free, prior and informed consent (FPIC) which is "a specific right that pertains to indigenous peoples and is recognised in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). It allows them to give or withhold consent to a project that may affect them or their territories".[13] FPIC policies are commonly available across the DFIs often as part of their E&S safeguard frameworks (e.g., IFC Performance Standard 7). Amongst bilateral DFIs only one lacked a publicly available FPIC policy. Of the multilateral DFIs in the landscape analysis, only three lacked publicly disclosed FPIC policies.

13 http://www.fao.org/indigenous-peoples/our-pillars/fpic/en/

TABLE 3: E&S community disclosure policies

Institution	E&S community disclosure: policy (organisational)				
	Does the DFI clearly define and articulate the number of days between project disclosure at community level and board approval for each risk category?	Does the DFI clearly define and articulate what E&S documentation will be disclosed to communities for investments at each risk category?	Does the DFI have a community disclosure policy?	Does the DFI have a community translation policy?	Does the DFI have a free, prior and informed consent policy?
Bilaterals					
DFI-1	No	No	Yes	Yes	Yes
DFI-2	No	No	Yes	Yes	Yes
DFI-3	No	No	Yes	Yes	Yes
DFI-4	No	No	No	No	No
DFI-5	No	No	Yes	Yes	Yes
DFI-6	No	No	Yes	Yes	Yes
DFI-7	No	No	Yes	Yes	Yes
DFI-8	No	No	Yes	No	Yes
Multilaterals - Public					
DFI-9	No	No	Yes	Yes	Yes
DFI-10	No	Yes	Partial	No	Yes
DFI-11	No	Partial	Yes	Yes	Yes
DFI-12	No	No	Partial	Yes	No
DFI-13	No	Yes	Yes	Yes	Yes
DFI-14	No	Yes	Yes	Yes	Yes
DFI-15	No	No	No	No	No
DFI-16	No	No	No	No	No
DFI-17	No	No	Yes	Yes	Yes
Multilaterals - Private					
DFI-18	No	No	Yes	Yes	Yes
DFI-10	No	Yes	Partial	No	Yes
DFI-11	No	Partial	Yes	Yes	Yes
DFI-12	No	No	Partial	Yes	No
DFI-19	No	No	Yes	Yes	Yes
DFI-14	No	Yes	Yes	Yes	Yes
DFI-15	No	No	No	No	No
DFI-20	No	No	No	No	No
DFI-17	No	No	Yes	Yes	Yes

GLOBAL PROJECT DISCLOSURE

General findings

This section assesses the global disclosure of E&S information at project level and how policies governing disclosure are actually implemented. There is marked difference between multilateral and bilateral DFIs in the level of E&S transparency at project level. Broadly, multilateral DFIs are more transparent; as a group they were found to be more transparent in all nine categories assessed in the landscape analysis with only limited differences between the sovereign and non-sovereign DFIs. Disclosure of Category A projects is also more extensive than for Category B projects although this relationship is not as strong as was expected, with numerous examples of inadequate disclosure of Category A projects.

Risk categorisation and rationale

Only half of the bilateral DFIs in the landscape analysis routinely disclose the E&S risk categorisation of their investments/projects. Of those four, only two provide rationales for the categorisations.

Disclosure of E&S risk categorisation among multilateral DFIs is mixed: seven disclose this information while four do not. One was found to disclose this information in most instances although this was inconsistent. Bar one, all the multilaterals that disclose risk categorisation also provide a rationale for the categorisation on their website. However, only three were found to do so systematically across Category A and B projects. The documentation for the DFI that discloses in most instances, albeit inconsistency, discloses explanations of risk categorisation but this is not displayed in the form of website disclosure.

This finding is significant as risk categorisation is arguably the first, and most fundamental, aspect of E&S management. If the risk categorisation of a project is not provided, it is difficult to assess what disclosure policies need to be followed.

Summary of E&S risks

Only two bilateral DFIs provide a publicly available summary of the E&S risks of their investments on a project basis. In the case of one this was found for Category A projects and higher risk Category B projects (B+ projects).

Amongst multilateral DFIs, summaries of E&S risks are more commonly disclosed although this disclosure is rarely systematic. Amongst Category B (or undisclosed category) projects four DFIs systematically disclosed a summary. Four others disclosed a summary of risks although instances of non-disclosure were identified in each case, while four do not provide this information. Results were similar in our analysis of Category A projects with just one DFI disclosing a summary of E&S risks in all cases.

Disclosure of relevant E&S policies

The two bilateral DFIs that provide a publicly available summary of the E&S risks of their investments on a project basis were also the only DFIs that identify the relevant E&S policies or safeguards for their investments. Of the two, one only does this for high risk (Category A) and some medium risk (Category B+) projects.

Disclosure of relevant E&S policies at project level by multilateral DFIs is mixed, without a clear relationship between the categorisation of projects and disclosure. Amongst Category A projects three DFIs were found to systematically disclose this information, four DFIs disclose this in some, but not all, cases. Two DFIs do not disclose this information. Amongst Category B (or undisclosed category) projects four DFIs disclose relevant policies systematically, three DFIs (disclose relevant policies in some cases, and five DFIs do not disclose this information.

TABLE 4: Global E&S disclosure of Category A projects

Institution	E&S global disclosure: implementation (project)								
	Does the DFI disclose the E&S risk categorisation of projects?	Does the DFI disclose an explanation of the E&S categorisation of projects?	Does the DFI disclose a summary of E&S risks?	Does the DFI disclose which E&S policies are relevant?	Does the DFI disclose E&S assessments/ plans?	Does the DFI disclose stakeholder engagement plans?	Does the DFI provide a DFI team lead contact?	Does the DFI provide a client contact?	Are all documents disclosed in relevant languages?
Bilaterals									
DFI-2	Yes	Sometimes	Sometimes	Yes	No	No	No	No	No
DFI-3	Yes	No	No	No	No	No	No	No	No
DFI-4	Yes	No	No	No	No	No	No	No	No
DFI-7	Yes	Yes	Yes	Yes	Yes	Sometimes	No	No	Sometimes
Multilaterals - Public									
DFI-9	Yes	No	Yes	Yes	Yes	Yes	No	No	Yes
DFI-10	Yes	Sometimes	Sometimes	Sometimes	Yes	Sometimes	Yes	Sometimes	Sometimes
DFI-11	Yes	Sometimes	Sometimes	Sometimes	Sometimes	Sometimes	Sometimes	Sometimes	No
DFI-12	Yes	Sometimes	Sometimes	Yes	Yes	Sometimes	Sometimes	Sometimes	Sometimes
DFI-13	Yes	Sometimes	Sometimes	No	Sometimes	Sometimes	No	No	Sometimes
DFI-14	Yes	Yes	Yes	Sometimes	Yes	Yes	No	Yes	Yes
Multilaterals - Private									
DFI-18	Yes	Yes	Yes	Yes	Yes	Sometimes	No	Yes	Sometimes
DFI-10	Yes	Sometimes	Sometimes	Sometimes	Yes	Sometimes	Sometimes	Sometimes	Sometimes
DFI-11	Yes	Sometimes	Sometimes	Sometimes	Sometimes	Sometimes	No	Sometimes	Sometimes
DFI-12	Yes	Sometimes	No	Yes	No	No	Sometimes	Sometimes	No
DFI-19	Yes	Yes	Yes	Sometimes	Sometimes	Sometimes	Yes	Sometimes	Yes
DFI-14	Yes	Yes	Yes	No	Yes	Yes	No	Yes	Yes

TABLE 5: Global E&S disclosure of Category B or undisclosed category projects

Institution	E&S global disclosure: implementation (project)								
	Does the DFI disclose the E&S risk categorisation of projects?	Does the DFI disclose an explanation of the E&S categorisation of projects?	Does the DFI disclose a summary of E&S risks?	Does the DFI disclose which E&S policies are relevant?	Does the DFI disclose E&S assessments/ plans?	Does the DFI disclose stakeholder engagement plans?	Does the DFI provide a DFI team lead contact?	Does the DFI provide a client contact?	Are all documents disclosed in relevant languages?
Bilaterals									
DFI-1	No	No	No	No	No	No	No	No	No
DFI-2	Yes	Sometimes	Sometimes	Sometimes	Sometimes	No	No	No	No
DFI-3	Yes	No	No	No	No	No	No	No	No
DFI-4	Yes	No	No	No	No	No	No	No	No
DFI-5	No	No	No	No	No	No	No	No	No
DFI-6	No	No	No	No	No	No	No	No	No
DFI-7	Yes	Yes	Yes	Yes	No	No	No	No	No
DFI-8	No	No	No	No	No	No	No	No	No
Multilaterals - Public									
DFI-9	Sometimes	No	Yes	Sometimes	Sometimes	Sometimes	No	No	Sometimes
DFI-10	Yes	Yes	Sometimes	No	Sometimes	Sometimes	No	No	Sometimes
DFI-11	Yes	Yes	Sometimes	Yes	Sometimes	No	Yes	No	Sometimes
DFI-12	Yes	Yes	Sometimes	Yes	Sometimes	No	Yes	Yes	Sometimes
DFI-13	Yes	Sometimes	No	Sometimes	Sometimes	Sometimes	No	No	Sometimes
DFI-14	Yes	Sometimes	Sometimes	Sometimes	Sometimes	Sometimes	Yes	Yes	Yes
DFI-15	No	No	No	No	No	No	No	No	No
DFI-16	No	No	No	No	No	No	No	No	No
DFI-17	No	No	Yes	No	Sometimes	No	No	No	Yes
Multilaterals - Private									
DFI-18	Yes	Yes	Yes	Yes	Sometimes	Sometimes	No	Yes	Sometimes
DFI-10	Yes	Yes	Sometimes	No	Sometimes	Sometimes	No	No	Sometimes
DFI-11	Yes	Yes	Sometimes	Yes	Sometimes	No	No	No	Sometimes
DFI-12	Yes	Yes	Sometimes	Yes	Sometimes	Sometimes	Yes	Yes	Sometimes
DFI-19	Yes	Yes	Yes	Yes	Sometimes	Sometimes	Yes	Yes	Sometimes
DFI-14	Yes	Sometimes	Sometimes	Sometimes	Sometimes	Sometimes	Yes	Yes	Yes
DFI-15	No	No	No	No	No	No	No	No	No
DFI-20	No	No	No	No	No	No	No	No	No
DFI-17	No	No	Yes	No	Sometimes	No	No	No	Yes

E&S assessments and plans

Of the bilateral DFIs, only two disclose E&S assessments or plans for their investments. In the case of one, this is done for Category A and Category B+ investments although not systematically. The other systematically discloses E&S assessments or plans for all Category A projects but not for Category B projects.

Amongst multilateral DFIs, disclosure is best for Category A projects, though there is still room for improvement: five DFIs disclose information systematically, three DFIs disclose information in some but not all cases, while one DFI does not disclose E&S assessments or plans. There is no systematic disclosure of E&S assessments or plans amongst Category B projects. Seven DFIs disclose information in some instances while three DFIs do not.

The relationship between categorisation and document disclosure is not always consistent. For example, in our sample we found disclosure documents for a DFI-11 project categorised as medium risk, but not for a high-risk project.

Stakeholder engagement plans

Of the bilateral DFIs, only one discloses stakeholder engagement plans (SEPs) for investments, and only in the case of high risk (Category A) investments. There is no disclosure at any level from other bilateral DFIs.

Disclosure of SEPs is more common amongst multilateral DFIs, although this is not uniform. For Category B (or undisclosed category) projects, no DFI was found to systematically disclose SEPs, while seven DFIs were found to disclose SEPs for some but not all projects, and six DFIs were not found to disclose SEPs. For Category A projects, two DFIs were found to systematically disclose SEPs, six DFIs disclose SEPs for some but not all projects, while one DFI does not disclose SEPs.

DFI team and client contacts

Broadly, we found transparency of DFI team contacts and client contacts at project levels to be low. None of the bilateral DFIs in our analysis disclose contact information for DFI project teams or clients for their investments, regardless of category.

Amongst multilateral DFIs, four DFIs disclose DFI team contact details for Category A projects, although this is only systematic for one. Four DFIs systematically disclose DFI team contacts for their Category B (or undisclosed category) investments.

In our Category A analysis six DFIs disclose client contact details although this is only systematic in the two cases. Four DFIs systematically disclose client contact details for Category B (or undisclosed category) investments.

Translation of documents

Of bilateral DFIs, only one discloses E&S documents in relevant local languages but only in some cases. Translation is more common amongst multilateral DFIs. For Category B projects two DFIs were found to systematically translate documents, while seven DFIs were found to translate documents but not in all relevant cases. Three DFIs do not disclose translated documents. For Category A projects eight DFIs disclose translated documents although this was only systematically done by three.

ASSURANCE OF COMMUNITY DISCLOSURE

General findings

To assess community disclosure by DFIs, we examined when, where and how disclosure took place, and what was disclosed. Our research found that DFIs provide limited evidence of assurance of disclosure to project affected communities. It should be noted that this does not mean that disclosure to project affected communities does not take place, only that DFIs do not systematically make public assurance that consultation requirements have been met. As a result, it is impossible to verify that the policies of DFIs are being enacted by them or their clients.

Assurance of when, where and how community disclosure happened

Our research found that assurance of community disclosure was more commonly provided for Category A projects than for Category B projects. Amongst bilateral DFIs only one was found to provide assurance of community disclosure, and this was done only for Category A projects. We found such assurance in all but one of the DFI's Category A projects assessed.

We found more extensive assurance of community disclosure from multilateral DFIs, again more commonly amongst Category A projects. However, only one DFI was found to provide assurance for all projects assessed. Of the other DFIs that disclose project classification, six provide assurance that community disclosure had taken place for Category A projects but not in every project assessed. Two DFIs do not provide such assurance. For Category B (or undisclosed category) projects only five DFIs were found to provide assurance of community disclosure (as reflected in documentation of community engagement) and it was not systematic in any instance. Five DFIs do not provide assurance of community disclosure.

Assurance of what was disclosed

Few DFIs confirm what types of documentation are made available locally to project affected communities and this form of assurance is never systematic. No bilateral DFIs provide these assurances. Of multilateral DFIs, four disclose various documents including summaries of E&S risks and E&S assessments/plans and stakeholder engagement plans but only for a small number of investments. No other multilateral DFIs do so.

TABLE 6: Assurance of community E&S disclosure for Category A projects

Institution	E&S community disclosure: implementation (project)									
	Does the DFI state the date of community E&S disclosure?	Does the DFI state the place of community E&S disclosure?	Does the DFI state the method of community disclosure?	Does the DFI provide documentation of what was disclosed?						
				Summary of E&S risks	E&S policies	E&S assessments/ plans	Stakeholder engagement plans	DFI team lead contact	Client contact	Relevant language
Bilaterals										
DFI-2	No	No	No	No	No	No	No	No	No	No
DFI-3	No	No	No	No	No	No	No	No	No	No
DFI-4	No	No	No	No	No	No	No	No	No	No
DFI-7	Sometimes	Sometimes	Sometimes	No	No	No	No	No	No	No
Multilaterals - Public										
DFI-9	Sometimes	Sometimes	Sometimes	No	No	No	No	No	No	No
DFI-10	Sometimes	Sometimes	Sometimes	No	No	No	No	No	No	No
DFI-11	Sometimes	Sometimes	Sometimes	Sometimes	No	No	No	No	No	No
DFI-12	Sometimes	Sometimes	Sometimes	No	No	No	No	No	No	No
DFI-13	Sometimes	Sometimes	Sometimes	Sometimes	No	No	No	No	No	No
DFI-14	Yes	Yes	Yes	Sometimes	No	Sometimes	Sometimes	No	No	Sometimes
Multilaterals - Private										
DFI-18	Sometimes	Sometimes	Sometimes	No	No	No	No	No	No	Sometimes
DFI-10	Sometimes	Sometimes	Sometimes	No	No	No	No	No	No	No
DFI-11	Sometimes	Sometimes	Sometimes	No	No	No	No	No	No	No
DFI-12	No	No	No	No	No	No	No	No	No	No
DFI-19	No	No	No	No	No	No	No	No	No	No
DFI-14	Yes	Yes	Yes	No	No	No	No	No	No	No

TABLE 7: Assurance of community E&S disclosure for Category B or undisclosed category projects

Institution	E&S community disclosure: implementation (project)									
	Does the DFI state the date of community E&S disclosure?	Does the DFI state the place of community E&S disclosure?	Does the DFI state the method of community disclosure?	Does the DFI provide documentation of what was disclosed?						
				Summary of E&S risks	E&S policies	E&S assessments/ plans	Stakeholder engagement plans	DFI team lead contact	Client contact	Relevant language
Bilaterals										
DFI-1	No	No	No	No	No	No	No	No	No	No
DFI-2	No	No	No	No	No	No	No	No	No	No
DFI-3	No	No	No	No	No	No	No	No	No	No
DFI-4	No	No	No	No	No	No	No	No	No	No
DFI-5	No	No	No	No	No	No	No	No	No	No
DFI-6	No	No	No	No	No	No	No	No	No	No
DFI-7	No	No	No	No	No	No	No	No	No	Sometimes
DFI-8	No	No	No	No	No	No	No	No	No	No
Multilaterals - Public										
DFI-9	Sometimes	Sometimes	Sometimes	No	No	No	No	No	No	No
DFI-10	Sometimes	Sometimes	Sometimes	No	No	No	No	No	No	No
DFI-11	No	No	No	No	No	No	No	No	No	No
DFI-12	No	Sometimes	No	No	No	No	No	No	No	No
DFI-13	Sometimes	Sometimes	Sometimes	Sometimes	No	No	No	No	No	No
DFI-14	Sometimes	Sometimes	Sometimes	No	No	No	No	No	No	No
DFI-15	No	No	No	No	No	No	No	No	No	No
DFI-16	No	No	No	No	No	No	No	No	No	No
DFI-17	No	No	No	No	No	No	No	No	No	No
Multilaterals - Private										
DFI-18	Sometimes	Sometimes	Sometimes	No	No	Sometimes	Sometimes	No	No	Sometimes
DFI-10	Sometimes	Sometimes	Sometimes	No	No	No	No	No	No	No
DFI-11	No	No	No	No	No	No	No	No	No	No
DFI-12	No	Sometimes	No	No	No	No	No	No	No	No
DFI-19	No	No	No	No	No	No	No	No	No	No
DFI-14	Sometimes	Sometimes	Sometimes	No	No	No	No	No	No	No
DFI-15	No	No	No	No	No	No	No	No	No	No
DFI-20	No	No	No	No	No	No	No	No	No	No
DFI-17	No	No	No	No	No	No	No	No	No	No

GLOBAL IAMS DISCLOSURE

General findings

All but five DFIs have IAMs. These five have been recorded as not applicable (N/A). Where IAMs do exist, organisational level disclosure of their presence is high, as is disclosure of the proceedings of IAM cases. However, project level disclosure of IAMs is slightly lower. As global disclosure of IAMs occurs via investment project pages, no notable differences were found between Category A and Category B (or undisclosed category) projects.

Disclosure of the presence of IAMs

All bilateral and multilateral DFIs with IAMs disclose the presence of it on their website, often quite prominently. Of the bilateral DFIs, all but one had an IAM visibly indicated on the DFI website. Of multilateral DFIs, the IAMs two were not highly visible on their respective websites.

Disclosure of IAMs findings and recommendations

The findings and recommendations of IAMs are less frequently disclosed by DFIs. Two bilateral DFIs with IAMs do not disclose the results of IAM cases. Amongst multilaterals, all but one disclose results or recommendations of IAM cases. It should be noted that to date this DFI has no recorded IAMs cases so this may change in the future.

Project level IAMs disclosure

There is less transparency of IAMs on DFI project pages. Of bilateral DFIs, only two disclose the presence of an IAM on each investment/project page. Four do not systematically disclose the presence of an IAM on their investment/project pages. Six multilateral DFIs disclose the presence of an IAM on each project page.

TABLE 8: IAMs global disclosure for Category A projects

Institution	Organisational			Project
	Does the DFI disclose the availability of IAMs on their website?	Is the IAM mechanism highly visible on the website of the DFI?	Does the DFI disclose IAMs results, responses or findings?	Does the DFI project page disclose the presence of the IAM?
Bilaterals				
DFI-2	Yes	Yes	Yes	Yes
DFI-3	Yes	Yes	Yes	No
DFI-4	Yes	Yes	Yes	No
DFI-7	Yes	Yes	Yes	No
Multilaterals - Public				
DFI-9	Yes	Yes	Sometimes	No
DFI-10	Yes	Yes	Sometimes	No
DFI-11	Yes	Yes	Sometimes	Yes
DFI-12	Yes	No	No	Yes
DFI-13	Yes	Yes	Yes	No
DFI-14	Yes	No	Yes	Yes
Multilaterals - Private				
DFI-18	Yes	Yes	Sometimes	Yes
DFI-10	Yes	Yes	Sometimes	No
DFI-11	Yes	Yes	Sometimes	Yes
DFI-12	Yes	No	No	Yes
DFI-19	Yes	No	Sometimes	Yes
DFI-14	Yes	No	Yes	Yes

TABLE 9: IAMs global disclosure for Category B or undisclosed category projects

Institution	Organisational			Project
	Does the DFI disclose the availability of IAMs on their website?	Is the IAM mechanism highly visible on the website of the DFI?	Does the DFI disclose IAMs results, responses or findings?	Does the DFI project page disclose the presence of the IAM?
Bilaterals				
DFI-1	N/A	N/A	N/A	N/A
DFI-2	Yes	Yes	Yes	Yes
DFI-3	Yes	Yes	Yes	No
DFI-4	Yes	Yes	Yes	No
DFI-5	Yes	Yes	No	Yes
DFI-6	Yes	No	No	No
DFI-7	Yes	Yes	Yes	No
DFI-8	N/A	N/A	N/A	N/A
Multilaterals - Public				
DFI-9	Yes	Yes	Sometimes	No
DFI-10	Yes	Yes	Sometimes	No
DFI-11	Yes	Yes	Sometimes	Yes
DFI-12	Yes	Yes	No	Yes
DFI-13	Yes	Yes	Yes	No
DFI-14	Yes	No	Yes	Yes
DFI-15	N/A	N/A	N/A	N/A
DFI-16	N/A	N/A	N/A	N/A
DFI-17	Yes	Yes	Sometimes	Yes
Multilaterals - Private				
DFI-18	Yes	Yes	Sometimes	Yes
DFI-10	Yes	Yes	Sometimes	No
DFI-11	Yes	Yes	Sometimes	Yes
DFI-12	Yes	Yes	No	Yes
DFI-19	Yes	No	Sometimes	Yes
DFI-14	Yes	No	Yes	Yes
DFI-15	N/A	N/A	N/A	N/A
DFI-20	N/A	N/A	N/A	N/A
DFI-17	Yes	Yes	Sometimes	Yes

COMMUNITY IAMS DISCLOSURE

General findings

We found limited evidence of disclosure of IAMs at community level. Two DFIs have developed policies that stipulate that the client should inform project affected communities of the existence of an IAM but these have not yet been made operational.

Community disclosure of IAMs

No bilateral DFIs currently require clients to disclose the presence of IAMs to project affected communities or state that the DFI itself will disclose the presence of the IAM. However, one has developed a new policy that will mandate that clients are responsible for such disclosure.

The situation is similar amongst multilateral DFIs; currently no DFI has a policy requiring the disclosure of IAMs to project affected communities or states that they will disclose the information themselves. However, one has developed a policy which will make client disclosure a requirement.

Assurance of community disclosure of IAMs

We found no policies requiring that clients or DFIs themselves verify that they have disclosed the presence of IAMs to project affected communities. In practice, we found only isolated instances of assurance of disclosure from one DFI across all projects. As with assurance of disclosure of E&S documentation to project affected communities, this does not necessarily imply that disclosure has not taken place, just that it cannot be confirmed.

TABLE 10: Assurance of IAMs community disclosure for Category A projects

Institution	Transparency of independent accountability mechanisms: policy (organisational)		Transparency of independent accountability mechanisms: implementation (project)			
	Does the DFI require clients to disclose the availability of the IAMs to project affected people at the same time as they are required to disclose E&S impacts?	Does the DFI state that it will disclose the availability of IAMs to project affected communities?	Does the DFI provide assurance that the availability of an IAM has been disclosed at community level?			
			Date	Place	Method	Relevant language
Bilaterals						
DFI-2	No	No	No	No	No	No
DFI-3	No	No	No	No	No	No
DFI-4	No	No	No	No	No	No
DFI-7	Yes*	No	No	No	No	No
Multilaterals - Public						
DFI-9	No	No	No	No	No	No
DFI-10	No	No	No	No	No	No
DFI-11	No	No	Sometimes	Sometimes	Sometimes	No
DFI-12	No	No	No	No	No	No
DFI-13	Yes*	No	No	No	No	No
DFI-14	No	No	No	No	No	No
Multilaterals - Private						
DFI-18	No	No	No	No	No	No
DFI-10	No	No	No	No	No	No
DFI-11	No	No	No	No	Sometimes	Sometimes
DFI-12	No	No	No	No	No	No
DFI-19	No	No	No	No	No	No
DFI-14	No	No	No	No	No	No

* DFI-7 and DFI-13 have policies that will mandate client disclosure in the future but are not currently operational.

TABLE 11: Assurance of IAMs community disclosure for Category B or undisclosed category projects

Institution	Transparency of independent accountability mechanisms: policy (organisational)		Transparency of independent accountability mechanisms: implementation (project)			
	Does the DFI require clients to disclose the availability of the IAMs to project affected people at the same time as they are required to disclose E&S impacts?	Does the DFI state that it will disclose the availability of IAMs to project affected communities?	Does the DFI provide assurance that the availability of an IAM has been disclosed at community level?			
			Date	Place	Method	Relevant language
Bilaterals						
DFI-1	N/A	N/A	N/A	N/A	N/A	N/A
DFI-2	No	No	No	No	No	No
DFI-3	No	No	No	No	No	No
DFI-4	No	No	No	No	No	No
DFI-5	No	No	No	No	No	No
DFI-6	No	No	No	No	No	No
DFI-7	Yes*	No	No	No	No	No
DFI-8	N/A	N/A	N/A	N/A	N/A	N/A
Multilaterals - Public						
DFI-9	No	No	No	No	No	No
DFI-10	No	No	No	No	No	No
DFI-11	No	No	No	No	No	No
DFI-12	No	No	No	No	No	No
DFI-13	Yes*	No	No	No	No	No
DFI-14	No	No	No	No	No	No
DFI-15	N/A	N/A	N/A	N/A	N/A	N/A
DFI-16	N/A	N/A	N/A	N/A	N/A	N/A
DFI-17	No	No	No	No	No	No
Multilaterals - Private						
DFI-18	No	No	No	No	No	No
DFI-10	No	No	No	No	No	No
DFI-11	No	No	No	No	No	No
DFI-12	No	No	No	No	No	No
DFI-19	No	No	No	No	No	No
DFI-14	No	No	No	No	No	No
DFI-15	N/A	N/A	N/A	N/A	N/A	N/A
DFI-20	N/A	N/A	N/A	N/A	N/A	N/A
DFI-17	No	No	No	No	No	No

Limitations to transparency of ESG and accountability

This section of the report draws on the findings of the landscape analysis and our interviews to highlight a range of issues related to the transparency of ESG and accountability. We argue that there are a number of gaps in the transparency of ESG and accountability that should be addressed. First, we discuss the impact of a shift to principle-based access to information policies, noting that while it is generally welcome there does appear to have been some erosion of automatic disclosure of E&S information, and that policies are often insufficiently prescriptive and thus open to interpretation. Second, we discuss the gaps in DFI policy implementation, both in terms of global and community disclosure. Improved assurance of community disclosure could help to address this. Third, we discuss the need for assurance of community disclosure by DFIs and their clients. Finally, we highlight the need for greater project risk categorisation in determining the extent of ESG transparency.

THE POLICY GAP

DFI policies that affect the disclosure of ESG and accountability information can broadly be split into two categories: the organisational transparency or access to information policies of the DFIs, and the policies of E&S frameworks that guide how community consultations and disclosure should occur. For example, IFC has an "access to information policy"[14] that guides general disclosure practices, while Performance Standard 1[15] of the IFC performance standards stipulates the ways in which community consultation and disclosure should occur. While it is not the purpose of this report to analyse either the access to information policies or E&S safeguarding policies of DFIs in general, they relate directly to the transparency of ESG and accountability and thus require further examination.

In recent years there has been a significant shift in the nature and content of DFI policies that guide transparency. Broadly, this shift is captured in the transition from a presumption of non-disclosure (with excepted lists) to a presumption of disclosure that acknowledges the right to access information (with some exclusions). This has been characterised as a transition from a procedure-based approach to a principle-based approach. AIIB summarise the new policy formulation as follows: "The adoption of a principles-based, rather than a list-based, approach to required public disclosure is intended by the Board of Directors to generate maximum disclosure and achieve a culture of operational transparency at the Bank".[16]

The implications for transparency of the shift from procedure to principle-based policies is complex. On the one hand, numerous CSOs that we interviewed have welcomed the shift, as this approach creates a system under which stakeholders can pursue various mechanisms (e.g., freedom of information requests) to access information. On the other hand, some interviewees felt that it had unintended consequences that limit some aspects of transparency. For example, one interviewee noted that the Asian Development Bank (AsDB) automatically discloses fewer documents under the new policy, instead only making them available if they are requested. This correlates with some of our findings when surveying AsDB disclosure, including the presence of high-risk investments with no E&S documentation attached.[17] While these documents may be available if requested, the lack of automatic disclosure is not best practice and could undermine community engagement.

14 https://www.ifc.org/wps/wcm/connect/6810c62b-2a5d-47f2-97ba-06193bba4e42/AIP_English_2012.pdf?MOD=AJPERES&CVID=kilXyKw
15 https://www.ifc.org/wps/wcm/connect/8804e6fb-bd51-4822-92cf-3dfd8221be28/PS1_English_2012.pdf?MOD=AJPERES&CVID=jiVQIfe
16 https://www.aiib.org/en/policies-strategies/public-information/_download/Policy-on-Public-Information.pdf
17 For example, https://www.adb.org/projects/51073-003/main#project-pds

THE DISCLOSURE GAPS

Almost all of our interviews with CSOs highlighted two gaps in the transparency of ESG and accountability of DFIs: 1) weaknesses in the disclosure practices of DFIs with policies that have a presumption of transparency, and; 2) the implementation of ESG and accountability disclosure. As noted above, while policies are broadly built on a presumption of disclosure, there are often gaps in the disclosure practices. The second, and arguably more significant gap, is between policies dictating global disclosure of ESG and the provision of accountability mechanisms and disclosure to communities in practice. Given that project affected communities often bear the majority of harm caused by a project, this is unacceptable. Interviews revealed numerous cases where community disclosure had not taken place or had taken place in a manner that was not meaningful. As these were anecdotal in nature, quantifying the frequency and scale of the gap between policies and implementation is impossible. This could be remedied by policies requiring DFIs to provide evidence that they (or their clients) have met disclosure requirements to project affected communities, such as the locations and dates of meetings and the materials disclosed to communities. While some evidence was found of this, it was neither systematic nor extensive enough to provide proper assurance in all instances. Given that project affected communities often bear the majority of harm caused by a project, we consider this a reasonable expectation. Even such requirements, however, would have some shortcomings. While they could ensure some community disclosure has taken place, there are factors that would be challenging to verify (e.g., whether meetings were held in environments free from intimidation).

As part of our research we analysed the repositories of IAMs and made use of Accountability Counsel's Console to better understand how often problems concerning transparency or disclosure result in complaints to IAMs. These findings are displayed in Table 12 below, and show that complaints that include "consultation and disclosure" make up a significant proportion of cases for a number of DFIs.

Over half of the registered cases of both the Inspection Panel (IDA/IBRD) and the Compliance Advisor Ombudsman (IFC) include a complaint regarding consultation or disclosure. While these results highlight that complaints to IAMs regularly include issues related to transparency, these figures likely represent only a small portion of the total. This is because the filing of a complaint with an IAM is reliant on transparency in the first place and project affected communities have to be aware of the role of a DFI in a project as well as the presence of an IAM. In addition, many projects with poor community disclosure may instead be handled through project grievance mechanisms or project management. Finally, there are potentially projects that were not disclosed to affected communities, did not result in significant harm and therefore did not result in complaints at any level.

TABLE 12: Number of IAMs cases for the DFIs

Institution	Name of IAM	Year created / joined	Total number of cases in DFIs registry	Average number of cases per year	Total number of cases on the Accountability Counsel Console (up to 2019)	Number of cases that include the issue "consultation and disclosure" as a reason for the complaint (from Accountability Counsel Console)
Bilaterals						
CDC	N/A	-	-	-	-	-
FMO	Independent Complaints Mechanism (ICM)	2014	7	1	5	3
DEG	Independent Complaints Mechanism (ICM)	2014	5	1	1	1
Proparco	Independent Complaints Mechanism (ICM)	2019	0	0	0	0
Norfund	N/A	-	-	-	-	-
Swedfund	N/A	-	-	-	-	-
DFC	Office of Accountability (OA)	2020 (formerly for OPIC from 2005)	1 (7 for OPIC)	1	0 (16 for OPIC)	0
DBSA	N/A	-	-	-	-	-
Multilaterals						
IDA/IBRD	Inspection Panel	1993	149	6	137	80
IFC *	Compliance Advisor Ombudsman (CAO)	1999	197	9	359	84
AfDB	Independent Review Mechanism (IRM)	2004	93	6	39	13
AsDB	Accountability Mechanism (AM)	2003	190	12	168	40
AIIB	Project-affected People's Mechanism (PPM)	2019	No registry	N/A	0	0
IADB	Independent Consultation and Investigation Mechanism (ICIM)	2010	156	16	149	43
IDB Invest	Independent Consultation and Investigation Mechanism (ICIM)	2015	5	1	0	0
EBRD	Project Complaint Mechanism (PCM)	2010–2020	52	5	104	26
CAF	N/A	-	-	-	-	-
IsDB	N/A	-	-	-	-	-
ICD	N/A	-	-	-	-	-
EIB **	Complaints Mechanism (CM)	2008	288	24	229	74

* This is for IFC and MIGA together

** This is for EIB Group – EIB and EIF together

LEARNING FROM IAMS REPORTS

Publications by, and evaluations of, IAMs reveal the extent to which failures in transparency and the disclosure of information to project affected communities feature in the cases they deal with. In turn, this supports the notion that effective transparency by DFIs and their clients, including recognising the right to information of project affected communities, is a vital aspect of ensuring projects or investments have a positive development impact. Further, it highlights the fact that transparency and community disclosure of ESG risks are in the interest of DFIs and their clients as it allows both parties to mitigate against future problems which may be time consuming and costly.

A 2017 review of the World Bank Inspection Panel reveals that of 120 requests for inspection, 106 included complaints about consultation, participation and information disclosure.[18] Thirty of the 34 cases that were accepted for inspection included such issues. These cases cover a 23-year period and originate from 22 different countries, indicating that such problems are long standing and not confined to a narrow set of contexts. Eighteen of the cases specified a lack of timely and accessible information disclosure as a problem. However, while the report highlights the importance of improved disclosure practices, it also notes that "conversely, considering consultation, participation and information disclosure in the narrow context of one-way information dissemination and as a time-limited process can amplify adverse environmental and social impacts". This is an important consideration for DFIs when seeking to improve disclosure to communities; meaningful engagement should be genuinely consultative, participatory and conducted in an ongoing manner. As discussed in more detail below, in instances where we identified assurance of community disclosure, this was typically limited to assurance that preliminary consultations had taken place at the start of a project. To better monitor and evidence ongoing consultation and disclosure, DFIs should arguably provide assurance of these processes at regular intervals across the lifetime of an investment or project.

In total, the Inspection Panel report identifies five lessons that are important to consultation, participation, and information disclosure:

1. Identifying all relevant stakeholders and engaging with appropriate representatives is crucial to establishing meaningful consultation and participation.
2. Disclosing all critical project-related information, including on potential risks and impacts, in a timely and accessible manner is the foundation for ensuring effective and meaningful participation.
3. Timely and accessible consultations that utilise culturally appropriate communication tools and give due consideration to the local context are essential.
4. Consultation and participation should be continuous, foster two-way communication and adequately respond to feedback from affected communities.
5. Considering the objectives of the different consultation requirements under the World Bank's safeguard policies is important.

18 https://inspectionpanel.org/sites/inspectionpanel.org/files/publications/Consultation%20Participation%20and%20Disclosure%20of%20Information.pdf

A 2019 review of the AsDB's IAM also highlights the importance of DFI transparency.[19] The report notes that information, consultation and participation was an issue in 19% of cases. The report highlights the fact that there is a broad consensus among stakeholders that AsDB needs to improve their transparency and disclosure practices, and that this should be done in line with the requirements of AsDB's policies. One significant finding of the report is that there is no clear link between the complaint and the risk categorisation of a project (i.e., they were not predominantly Category A projects). This arguably demonstrates the need to improve transparency practices across the portfolio of DFIs; improving disclosure only for high-risk projects is insufficient.

The importance of improving information sharing, consultation and participation is discussed in depth in a 2012 report published by the IAMs Network.[20] The report traces the development of IAMs to the 1992 Earth Summit, which included a principle calling for the right of citizens to participate in the development process and access information, as well as to be provided with "effective access to judicial and administrative proceedings, including redress and remedy". The report states that in over 65% of IAMs cases analysed, inadequate consultation and information disclosure was an issue. It also found that the presence of IAMs have demonstrably improved the performance of DFIs.

A 2020 review of the IFC/MIGA Compliance Advisor Ombudsman (CAO) highlighted the importance of the transparency of IAMs themselves.[21,22] In an extensive evaluation of the CAO, the report found that the "CAO does carry out regular and substantive outreach to CSOs in all the regions where IFC and MIGA operate. However, this outreach does not normally engage affected communities directly. Currently, IFC/MIGA clients are not required to disclose the existence of CAO to potentially affected stakeholders, but IFC and MIGA do disclose the existence of CAO (including contact information) in their Policies and on their websites in their project disclosures, specifically the "Environmental and Social Review Summary". The fact that IFC does not require their clients to disclose the existence of the CAO is a major barrier in its use. This highlights the need for DFIs to, first, mandate client disclosure of the existence of an IAM as a channel for recourse, and second, provide assurance on a case-by-case basis that this disclosure has been completed by the client. As with other reports, the importance of the CAO in improving IFC operations is emphasised: "CAO, through its Advisory role, is well positioned to make a significant contribution to reforms in E&S issues. It is designed to provide recommendations to strengthen IFC and MIGA's E&S policy and practice based on generating learning from CAO's case experience". However, if these contributions are to be meaningful, it is imperative that all project affected communities are aware that IAMs exist and provide a pathway to remedy of negative externalities.

19 https://www.adb.org/sites/default/files/institutional-document/521641/2018-accountability-mechanism-learning-report.pdf
20 https://www.opic.gov/sites/default/files/files/citizen-driven-accountibility.pdf
21 http://pubdocs.worldbank.org/en/578881597160949764/External-Review-of-IFC-MIGA-ES-Accountability-disclosure.pdf
22 Discussion of the CAO Report can be found here: https://www.publishwhatyoufund.org/2020/09/cao-external-evaluation-a-partial-victory-for-transparency-and-accountability/#

DFI–CLIENT RELATIONSHIP

One theme that emerged from our interviews was the division of responsibility for disclosure to project affected communities between DFIs and their clients/implementing agencies. Interviewees noted that community level disclosure is often conducted by either the DFI's client or a third-party (such as a consultancy), and this has implications for what we can expect from DFIs.

In our interviews with DFI staff, we found a general consensus that disclosure to project affected communities should be conducted by the client. There are a number of reasons to support this position. First, while the DFI is a financer of a project, in most cases (with the exception of equity purchases) it neither owns nor implements it. The implication of this is that the DFI will not have an ongoing presence at the project whereas the client will and, as such, is better positioned to implement E&S safeguards and monitor and manage E&S risks. Second, while DFIs often operate in contexts where client companies have limited capacity, supporting clients to improve capacity and governance is part of the additionality that they offer to investments. Finally, while DFI involvement in an investment is often time-limited (for example, by the length of a loan), the potential for harms can exist for the lifetime of the project. As such, it may be more appropriate for the client to manage ongoing E&S safeguards.

On the other hand, DFIs have policies and rules that are designed to ensure that their investments and projects are beneficial and sustainable, while numerous national and international laws have established the right to information of project affected communities. In such a context there is a clear need for thorough due diligence from DFIs and ongoing monitoring of E&S safeguarding. Stakeholders also have a right to know that the requisite community disclosure is taking place which is why we argue for assurance of disclosure. Even if it is accepted that community disclosure can be conducted by clients or implementing agencies, it is reasonable to expect DFIs to provide meaningful assurance that this disclosure has taken place.

The same issue applies to the disclosure of IAMs by clients. A recent review of the IFC's independent accountability mechanism, the Compliance Ombudsman Office (CAO), identified two gaps related to the disclosure of recourse options to affected communities who have concerns about a project's impact:

1. IFC clients are required to establish project grievance mechanisms for high risk projects but the IFC itself does not need to verify whether clients have actually informed people about the existence of the mechanism.

2. The IFC's website has multiple links to the CAO, but does not require IFC clients (i.e., the project implementers) to disclose the CAO's existence. This is a notable policy gap because affected communities may not be aware that the IFC is financing the project, have access to IFC websites, or be able to read the information provided.

The review recommends that IFC incorporate measures to verify that affected communities are made aware of grievance mechanisms and the CAO, including by using surveys to determine the level of awareness. This has broad implications because many other DFIs use IFC performance standards.

PROJECT RISK CATEGORISATION

DFIs categorise projects according to their perceived E&S risks, typically using three categories of risk. For example, IFC categorises projects as follows:

- Category A: Business activities with potential significant adverse environmental or social risks and/or impacts that are diverse, irreversible or unprecedented.
- Category B: Business activities with potential limited adverse environmental or social risks and/or impacts that are few in number, generally site-specific, largely reversible and readily addressed through mitigation measures.
- Category C: Business activities with minimal or no adverse environmental or social risks and/or impacts.[23,24]

The categorisation of projects is an important issue related to the transparency of E&S risks as it often determines the level of required disclosure. In theory, all projects in the highest risk category should have extensive E&S disclosure at global and community level, while E&S disclosure for medium risk projects may vary according to individual project attributes. E&S disclosure for low risk projects is typically negligible. In practice, our research found that this pattern was not as strong as DFI policies suggest it should be. There were numerous cases of medium risk projects that had more extensive disclosure than high risk projects. As such, how projects are categorised, and the disclosure of project categorisation, warrants further attention.

A related issue that emerged from discussions with our Expert Working Group was that projects are sometimes categorised incorrectly which in turn results in inadequate disclosure. This issue was characterised as the prevalence of "big Category B projects". While assessing the validity of project categorisation practices is beyond the remit of this report, failure to disclose project categorisation and the rationale that informs it make it impossible for stakeholders to assess whether or not appropriate disclosure has taken place.

To assess whether appropriate disclosure policies apply, DFIs should disclose:

- The parameters for each project category within their risk categorisation system.
- The disclosure requirements, at both global and community level, for each project category, including time limits for their implementation.
- The category of each individual project.
- The rationale for categorisation of each individual project.

23 https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/es-categorization
24 FMO uses a further categorisation (B+) to identify projects that fall broadly within Category B but have higher risk elements.

ASSURANCE OF COMMUNITY DISCLOSURE

As noted in the analysis above, we found limited examples of DFIs providing assurance of community disclosure. Assurance was found more regularly in high risk (Category A or similar) projects than it was in medium or low risk (Category B) projects. This can largely be explained by the fact that most instances of assurance identified were found in stakeholder engagement plans (SEPs) and these documents are more commonly disclosed for high risk projects. The fact that assurance of disclosure was primarily found in SEPs has a number of implications for the quality and extent of assurance provided.

As SEPs are developed in the early stages of a project, assurance of disclosure is typically limited to early consultations with project affected communities and other stakeholders. In most cases consultations took the form of community meetings and focus groups. In some instances, the minutes (or summaries of minutes) of such meetings were included in the annexes of SEPs. However, given the timeframe in which SEPs are completed, they do not (and cannot) provide assurance of community disclosure that occurs at later dates. In most cases SEPs provide details of future consultations (and in some cases of document disclosure) but assurance that this disclosure occurs is not provided.

The limited timeframe of assurance of SEP related disclosure means that it is impossible to verify that relevant documents have been disclosed (or made available) to communities or that additional disclosure requirements that take place after the release of the SEP have been met. While a lack of assurance does not necessarily mean that such disclosure has not taken place, assurance could provide an important step in validating such processes. Furthermore, given the role and responsibility of DFIs, we believe they should publicly verify that such disclosure has taken place.

Conclusion

Our report argues that DFI's policies pertaining to the disclosure of ESG risks and accountability are broadly quite transparent and well developed, but the practices undertaken by DFIs rarely match their policy obligations. For example, there is scope to better define what types of information should be disclosed at each category of risk, especially for Category B projects which can vary significantly in levels of ESG risk. There is also scope for more explicit policies concerning the timeliness of disclosure at each project category level. Access to information policies could also be improved by tightening up the application of exceptions so these are limited to protect against harms. Finally, we see scope for improving disclosure of project information to project affected communities by providing more information in local languages.

Our analysis found that the global (website based) disclosure of ESG risks was mixed. Disclosure was higher for MDBs than for bilateral DFIs and generally more extensive for Category A projects than for Category B projects. The differences between bilateral and multilateral DFIs may be explained by the fact that with the exception of DFC, bilateral DFIs do not disclose secondary documentation (such as stakeholder engagement plans and environmental and social impact assessments) for their projects.

While document disclosure was found more commonly for Category A projects than for Category B projects, it was rarely systematic. We found instances of disclosure not taking place even with Category A projects which suggests that DFIs are not adhering to their own policies.

Global disclosure of the presence of IAMs was high – their presence was disclosed on all DFI websites and on most project pages.

Significantly, we identified systematic disclosure from at least one DFI for every aspect of global disclosure that we assessed. This suggests that all the aspects of disclosure we assessed could potentially be disclosed by the other DFIs.

The report found that DFIs do not systematically provide assurance that community disclosure has taken place for their projects. While assurance of disclosure was more common for Category A projects than for Category B projects, only one DFI (EBRD) provided assurance for all the Category A projects that we assessed. Assurance of disclosure was typically provided in stakeholder engagement plans and as such was normally limited to assurance in early phases of project development. As such, we found almost no assurance that project documents had been disclosed to project affected communities following the release of the SEPs.

We found the categorisation of projects had an impact both on levels of global disclosure and assurance of community disclosure. While these differences were not as pronounced as DFI policies suggest they should be, they highlighted a number of issues. First, Category A projects display higher levels of transparency than Category B projects as a whole. However, the differences between Category A projects and Category B projects that are on the higher end of the risk spectrum are not very transparent, which makes determining the appropriate level of disclosure difficult. Second, categorisation does not serve as a guarantee that transparency will be done well by DFIs. As noted above, we identified numerous instances of Category A projects with insufficient transparency.

Finally, evidence from IAMs cases and evaluations of IAMs shows that being transparent with respect to ESG and accountability is in the interest of DFIs. Complaints related to information disclosure feature commonly in IAMs cases, indicating that numerous cases could have been avoided had these requirements been fully met.

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