

May 14, 2019

Office of the Presidency  
Inter-American Development Bank  
1300 New York Avenue, NW  
Washington, D.C. 20577

CC: Board of Executive Directors

**RE: Review and update of the Safeguard policy framework at IDB Group**

Dear Roberto Manrique,

The purpose of this letter is to express the concerns of the undersigned civil society organizations about the process to review and modernize the Safeguard policy framework of the Inter-American Development Bank Group (IDBG), and to request a meeting with you and your team, to discuss how consultations can be carried out with stakeholders from the region in a meaningful and inclusive way.

The safeguards policy framework review presents an opportunity for the IDBG to adopt an upgraded set of policies that are not only aligned with the highest international standards, but that also reflect the goals of the IDBG and the needs and rights of the people, communities, and countries in the region. A first step and key condition for guaranteeing an effective outcome is to ensure a robust, meaningful, and inclusive consultation process.

A major concern to date is that the IDBG is not taking appropriate measures to help ensure meaningful participation for civil society and communities in the review process. The process so far has suffered from a lack of transparency, stemming in part from the failure to differentiate the two ongoing policy revisions at both IDB and IDB Invest, and to explain how these separate reform processes will fit together. We urge the IDBG to clarify how these processes relate, and to design and implement a robust consultation process that is representative of the region and that includes local voices, by taking on the following recommendations (based on lessons learned and experiences from our previous engagement with IDBG and World Bank consultations):

- **Disclose the Road Map (the document that states how OVE's recommendations will be implemented) and announce steps for consultations:** To ensure that all stakeholders are aware of the timeline review process and prepared accordingly it is critical that the IDBG provides a detailed calendar with concrete dates and desired outcomes. The IDBG has so far not published any timeline or outlined steps for the safeguard review process (including schedule and planning). When civil society requested access to the Road Map, the reply from the Bank was a link to the [Comments from Management to OVE's Environmental and Social Safeguard Evaluation](#), which does not outline precise steps for the process to review the Bank's safeguard policy framework.
- **Establish an acceptable timeframe for the review process:** At least three consultation phases should be held to provide stakeholders with multiple opportunities to dialogue and engage with IDBG staff as the new policies are drafted and revised.

- **Meet with Civil Society at the IDB Annual Meetings in Guayaquil:** Provide opportunities for civil society to participate in the Annual Meetings of the Board of Governors of the IDB and IDB Invest, to be held in July in Guayaquil, Ecuador.
- **Send invitations to consultations in advance and ensure diversity and accessibility:** Guarantee a minimum of 30 days' notice prior to each consultation. Use public announcements, proactive outreach by country offices, and video and telephone conferencing to make the consultation process accessible in all IDBG-member countries, and beyond country capitals. Make clear to country offices that outreach must include critical civil society, indigenous peoples and other local organizations, and people affected by IDBG projects (including MICI requesters).
- **Provide stakeholders with the information they need to participate in a meaningful way:** Publish documents a minimum of 30 days prior to the consultation. Ensure that safeguard documents and drafts, including annexes and directives, are available in the relevant member country language.
- **Seek input from stakeholders in determining how they participate:** Make sure the agendas are strong and participatory and not just PowerPoint presentations. Share the agenda in advance and be ready to respond to questions about it ahead of time. Structure the agenda considering the people who will attend.
- **Ensure ongoing communication with stakeholders after the consultation:** Be ready to provide feedback on how their input influenced decisions and keep stakeholders informed.

It is critical that IDBG acknowledge the importance of including voices from the region in the review of the safeguards, which will have enormous implications for IDBG-sponsored development. We look forward to working with Management to ensure the consultation process is meaningful and participatory, with the goal of improving the safeguards to reflect best international standards.

Sincerely,

### **Signatories**

Derecho, Ambiente y Recursos Naturales (DAR), Perú  
 Asociación Interamericana para la Defensa del Ambiente (AIDA), México & Chile  
 Asociación Ambiente y Sociedad (AAS), Colombia  
 Bank Information Center (BIC), US  
 Center for International Environmental Law (CIEL), US  
 Fundación para el Desarrollo de Políticas Sustentables (FUNDEPS), Argentina  
 Centro Mexicano de Derecho Ambientas (CEMDA), México  
 Plataforma Internacional contra la Impunidad, Suiza  
 Oxfam, US  
 Fundación para el Debido Proceso (DPLF), US  
 Sustentarse, Chile  
 Fundación Ambiente y Recursos Naturales (FARN), Argentina  
 Iniciativa por las Inversiones Sustentables China-América Latina (IISCAL), US  
 International Trade Union Confederation (ITUC), Int'l  
 Organización Nacional de los Pueblos Indígenas de la Amazonía Colombiana (OPIAC), Colombia