December 17, 2019

Board of Directors
Inter-American Development Bank
1300 New York Avenue, NW
Washington, D.C. 20577

RE: Recommendations to strengthen the IDB Invest Sustainability Policy review

Dear Directors and Counselors,

The purpose of this letter is to express the concerns of the undersigned civil society organizations about the process to review the Environmental and Social Sustainability Policy of the IDB Invest and to urge the Board of Directors to ensure that the new Sustainability Policy is a substantially and comprehensively revised version of the one proposed in Draft 1. Therefore, we urge you to ensure that IDB Invest Management takes civil society inputs seriously.

We believe that the way the IDB Invest consultation has been structured --with one consultation phase and no additional consultations, overlooking the recommendations made in a letter sent to Management in May, 2019-- inhibits civil society engagement in the process. We cannot effectively engage in a consultation process if there are no genuine and multiple opportunities to dialogue and engage with IDB Invest as the Policy is revised.

Based on widely shared experiences from our previous engagement with IDB Group, IDB Group engagement with civil society and affected communities has been and continues to be worryingly weak compared to other Multilateral Development Banks. The lack of civil society participation in IDBG Annual Meetings represents just one example.

To make the IDB Invest Sustainability Policy review process more accountable and open, we urge the Board of Directors to take into consideration the following recommendations:

• Ensure that the full set of comments received during the consultation process is published at least one month before the draft is sent to the Board for consideration.

• Ensure that the matrix with the comprehensive analysis and response of the comments received is published at least one month before the draft is sent to the Board for consideration.

• Only approve a Policy that reflects IDB Invest having meaningfully considered and incorporated (where appropriate) inputs made by civil society, local communities, and indigenous peoples.

We appreciate your consideration and look forward to working with the Board and IDB Invest Management to improve the safeguards to reflect the best international standards.

Sincerely,
Asociación Ambient y Sociedad (AAS), Colombia
Asociación de Desarrollo Sostenible de Poblaciones vulnerables (ADECEP), Peru
Asociación Interamericana para la Defensa del Ambiente (AIDA), Regional
Asociación Manuelita y Analy (MAW LSP), Peru
Asociación Peruana de Abogados con Discapacidad visual, Peru
Asociación Unión de Talleres 11 de Septiembre, Bolivia
Bank Information Center (BIC), US
Center for International Environmental Law (CIEL), US
Centro de los Derechos del Campesino, Nicaragua
Centro de Estudios para el Desarrollo Laboral y Agrario (CEDLA), Bolivia
Centro de Incidencia Ambiental de Panamá (CIAM), Panama
Centro Mexicano de Derecho Ambiental (CEMDA), Mexico
China-Latin America Sustainable Investments Initiative (CLASII), International
Coalición Regional por la Transparencia y Participación, Regional
Colectivo 21, Peru
CONECTAS Direitos Humanos, Brazil
Derecho, Ambiente, y Recursos Naturales (DAR), Peru
Federación Nacional de Mujeres con Discapacidad del Peru (FENAMUDIP), Peru
Fondo Tierra Viva, Honduras
Fraternidad Cristiana de Personas con Discapacidad (FRATER), Peru
Fundación Ambiente y Recursos Naturales (FARN), Argentina
Fundación Cambio Democrático (FCD), Argentina
Fundación CAUCE, Cultura Ambiental Causa Ecologista, Argentina
Fundación Humedales, Argentina
Fundación para el Desarrollo de Políticas Sustentables (FUNDEPS), Argentina
Gender Action, US
Instituto de Estudios Socioeconómicos (INESC), Brazil
International Accountability Project (AIP), International
Mesa Discapacidad y Derechos de la Coordinadora Nacional de Derechos Humanos, Peru
ONG Sustentarse, Chile
Organización Nacional de los Pueblos Indígenas de la Amazonía Colombiana (OPIAC), Colombia
Otros Mundos Chiapas, Mexico
Oxfam
Plataforma Internacional contra la Impunidad, International
Sociedad y Discapacidad (SODIS), Peru
Soluciones Integrales Ver SAC, Peru