



# A Community Guide to Independent Accountability Mechanisms

A guide for communities in Africa

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**Cover photo:** Women from Médina Témègne farm, Kaffrine region, Senegal, West Africa by Xavier Boulenger | Shutterstock

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Photo: Isimba dam | International Rivers

# Introduction

Development projects such as dams, roads, power plants, and mines can displace communities and damage the land and rivers that they need for their livelihoods. Over the past decades, communities affected by large-scale development projects and their civil society allies have worked together to advocate for the creation of accountability mechanisms to address these problems. Independent Accountability Mechanisms (IAMs), also called grievance mechanisms, are a tool that communities can use to hold international banks or companies accountable for harm they have caused.

Accountability mechanisms may be set up by banks, companies, or regional and international organizations. Some function as independent offices within banks or companies that have the authority to investigate complaints and help resolve disputes. Others address states' responsibilities to protect their citizens against human rights violations by banks or companies. Community members may file complaints directly with accountability mechanisms, or authorize representatives to file a complaint on their behalf.


Accountability mechanisms are set up to ensure that banks and companies follow their own social and environmental guidelines. There are many different accountability mechanisms, and it is important to learn about them first before deciding which one is best for your community. Some accountability mechanisms address problems through mediation and dialogue, and some also conduct investigations that lead to recommendations or public statements.

A complaint can be used to limit or stop harm that your community is already experiencing, or to prevent future harm should a project go forward. As a result of the complaint, a team of investigators may visit your community, talk to residents who are experiencing problems, and make recommendations to solve the problems. This could include setting up discussions between a community and a company to work towards solutions, or compensation for harm done to communities and the environment.

Filing a complaint may also help your community get the attention of the public and the media. In turn, this may put pressure on politicians, decision-makers, and investors to solve the community's problems. If a complaint is successful, this can help other communities by raising the standards of behavior for the companies and banks, and promoting better policies in the future.

Development should always improve lives and never cause harm. When projects are planned and implemented in your community, it is your right to receive information about the project and how to respond. Increased participation by communities through the use of accountability mechanisms can help prevent harm and lead to the kind of development that your community wants.

This community guide aims to introduce people who face harm or potential harm from large-scale development projects to the process of filing a complaint, and the various accountability mechanisms available. We have written this guide primarily for community groups in Africa with the aim of making this information readily accessible and user-friendly. We have included resources and contacts at the end of the guide for those wishing to access more detailed information, project-specific advice, or to get help filing a complaint.



**Development should always improve lives and never cause harm. When projects are planned and implemented in your community, it is your right to receive information about the project and how to respond.**

# Is Filing a Complaint a Good Strategy for Our Community?

Not all communities have good experiences with accountability mechanisms. Sometimes the kinds of harm a community is facing is not covered by the mechanism. Some mechanisms are confusing and hard to follow. Sometimes investigations and mediations go on for a long time while community members continue to suffer. While a complaint is on-going, there may be rules that limit the issues that you're able to discuss publicly or share with the media.

Most importantly, complaints are not the same as lawsuits. The accountability mechanisms presented in this guide are non-judicial, meaning that they do not involve going to court. One good thing about this is that a complaint can move quicker than a lawsuit, and you can file a complaint on your own without the help of a lawyer. Because most accountability mechanisms are non-judicial, however, the bank or company involved must be willing to go along with the investigation process. If it refuses to cooperate, the complaint may fail. As there is no legal judgment, most accountability mechanisms cannot force banks or companies to change their behavior or to solve the problems that communities are experiencing.

Accountability mechanisms do not typically charge fees, and some may provide financial assistance to the community members filing the complaint to

help them engage in the process. However, filing a complaint with an accountability mechanism can still be costly in terms of time spent away from making your living. Preparing a complaint requires significant community organizing efforts to establish a fair decision-making process and ensure that the diverse interests of your community are represented. You will also need to spend time investigating and documenting the harms your community is experiencing, and finding information about the banks or companies involved. You may have to cover travel expenses to participate in meetings. Finally, the complaint process may take several years to complete.

Considering these challenges, is there another strategy that might be more effective or efficient?

Should you decide to file a complaint, it is important to manage expectations so that after much investment of time and energy, you and your community members are not overly disappointed by the outcome. Remember that using an accountability mechanism is most effective when combined with other advocacy and campaign strategies. You can find some examples of these in the Additional Advocacy Strategies section towards the end of this guide.

## Security

People sometimes receive threats or are harmed for requesting more information about a development project or the banks and companies involved. Could filing a complaint cause harm to you or your community members? For example, are there powerful people in your local area who will benefit if the project goes forward? Is there a chance that they could retaliate? It is important to note that although most accountability mechanisms allow you to keep your complaint confidential, they do not have guarantees to protect people against intimidation or retaliation if they file complaints.

Considering these risks, your community members must be able to make fully informed decisions about if and how they wish to participate in the complaint

process. If you decide to file a complaint, it is important to work as a group to assess the potential risks and make a plan to minimize them. You can continue working together to reassess these risks at various times throughout the complaint process. Some people feel that it is safer to file a complaint individually or as a small group, or to authorize someone from outside the community to file the complaint on their behalf. Others feel safer making the complaint as a larger community or network, with full media attention.

Generally, the more people that join in the complaint, the more attention it receives. This is called jointly filing a complaint. When other groups such as farmers networks, indigenous peoples' networks,

trade unions, civil society groups, and international coalitions sign on to support a complaint, this can make the voices of the affected people louder. It can also help draw attention to the problem, not just in the local area, but throughout the country and around the world.

When filing a complaint, it is good to develop a way to share information so that everyone involved feels safe throughout each step of the complaint process. You can do this by identifying a safe place

for meetings, and by identifying a safe way to share sensitive information, such as through encrypted email and messaging services.

You can find detailed information and guidance on assessing risks and creating a security plan in this publication by Front Line Defenders: <https://www.frontlinedefenders.org/en/workbook-security>



Photo: Maasai women, Tanzania | Shutterstock

# Know Your Rights

When deciding whether to file a complaint, it is important for you and your community members to know your rights, and to be able to identify which of your rights may have been violated.

According to international human rights standards, when a development project potentially affects your community and natural resources, you have the right to meaningful consultation.

Consultation refers to the process of exchanging information, recommendations, ideas, and opinions about possible development plans among people and communities whose lives would be affected. Consultations should begin as early as possible, well before any plans have been finalized, and should continue throughout the development process. You can also use consultations to discuss and share your community's own development plans.

Consultation should be the first door that opens many opportunities for you to participate and engage in development processes that affect you and your community. Regardless of whether they are conducted by your community or by outsiders, the consultations should ensure that everyone in the community is included and has space to express their opinions. You have the right to know about what is being planned and how it will happen, and to ask questions and receive answers.

A consultation might take the form of a public discussion, or smaller group conversations. However, bringing people together to only listen to information from one side and not allow people to contribute their ideas and opinions is not a consultation. A good consultation is planned by and for the people, and:

- Allocates time fairly and provides equal opportunity to all participants to voice their concerns, ideas and opinions
- Is conducted in a culturally appropriate manner and in a place that makes you feel comfortable expressing your thoughts, without fear or pressure
- Happens early enough in and throughout the development process so that feedback gathered can drive the design of a project, and its later implementation
- Is a space where your community has the power to say yes or no, to accept or to reject, the project, plan, or idea being proposed

Consultations should be done in a manner that is free from coercion or threat, prior to the finalization or implementation of any plans, and in a language that your community members can easily understand. Your community should have the opportunity to collectively approve or reject a project before the start of any activities, and at each stage of the project. A decision is reached through an agreed-upon community engagement process that respects the rights of all – particularly women, the elderly, and youth.<sup>1</sup>

In addition to international human rights laws and standards, it is important to research which of your own country's laws may have been violated by the project. Even if your country's laws do not provide adequate protection, however, your rights should be recognized by international project developers. You can use this publication by International Accountability Project to do a training for your community members so that they are aware of their rights prior to filing a complaint: [https://accountabilityproject.org/wp-content/uploads/2020/11/Community\\_Action\\_Guide\\_What-is-Development.pdf](https://accountabilityproject.org/wp-content/uploads/2020/11/Community_Action_Guide_What-is-Development.pdf)



Photo: Himba Momunity Meeting, Namibia | International Rivers

1. International Accountability Project (2020) Community Action Guide: What is Development? [https://accountabilityproject.org/wp-content/uploads/2020/11/Community\\_Action\\_Guide\\_What-is-Development.pdf](https://accountabilityproject.org/wp-content/uploads/2020/11/Community_Action_Guide_What-is-Development.pdf)



## Your Rights under International Law

The United Nations Declaration on the Right to Development acknowledges your right to participate in all development processes. You have the right to development that does not harm you, and you have the right to fairly benefit from development that affects you. You can read the full version here: <https://www.ohchr.org/en/instruments-mechanisms/instruments/declaration-right-development>

The United Nations International Covenant on Economic, Social and Cultural Rights says that 'all peoples have the right to self-determination' and- linked to the right to self-determination-'all peoples have the right to freely pursue their economic, social and cultural development.' You can read the full version of the Covenant here: <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-economic-social-and-cultural-rights>

The concept of Free, Prior and Informed Consent (FPIC) recognizes a peoples' rights to full and effective participation in negotiation and planning when a project affects community lands, territories and natural resources. This right is recognized in the United Nations Declaration on the Rights of Indigenous Peoples: [https://www.un.org/esa/socdev/unpfii/documents/DRIPS\\_en.pdf](https://www.un.org/esa/socdev/unpfii/documents/DRIPS_en.pdf)



Photo: United Nations Building in Geneva Switzerland | Shutterstock

# Community Organizing

All members of your community should feel free to discuss, debate, and express their thoughts and opinions about the kind of development they wish to see. The process of filing a complaint will be most successful if your community is well-organized and informed, with all members enjoying equal access to information and equal roles in decision-making. Working together to answer the following questions will help your community get ready to begin the complaint process:

- Who is affected by the project? Some groups of people may be directly affected, while others may be indirectly affected. Are they united in their concerns about the project?
  - If possible, any divisions within or between communities should be resolved early on so that they do not undermine the process. Problem-solving is most effective when the affected communities speak with one voice. Are there divisions that could become worse once the complaint process begins? How can divisions be overcome so that our efforts are cooperative?
  - Do the people experiencing harm fully understand the accountability mechanism and agree with filing a complaint? If not, would it be useful to organize a training for your community first?
  - Who should file the complaint? Just a few people, the broader community, or a group of communities that have been affected by the project? Do we have other allies, such as farmers networks or civil society groups that we should invite to join the complaint?
  - Who will speak for and lead our group? Will there be a spokesperson? How can we ensure that information is shared freely and openly throughout the complaint process?
  - Does our community have a traditional decision-making structure that is inclusive of all types of people affected by the project, or would it be better to create a new, more democratic decision-making process?
  - Will decisions be made by consensus, by a majority vote, or by another method? Who will be involved in decision-making? While your leaders or representatives may be able to make some decisions on behalf of the group, you should agree beforehand what kinds of decisions require everyone's participation.
- People who have less power in society are often more affected by harmful projects. How will we ensure that women, ethnic minorities, youth, people with disabilities, and other marginalized groups are equally informed and able to fully participate in the complaint process?
  - How can we ensure that language is not a barrier for those who do not speak the languages used by banks, companies, and accountability offices? While accountability mechanisms must provide translation and interpretation assistance and shoulder the cost, it is good to identify trusted allies who can verify that translation is done properly and without bias.
  - Are there any trusted allies with valuable knowledge and experience who we can reach out to for advice? This could include people from local civil society groups or NGOs, regional or international groups, lawyers, university professors or students.
  - If we decide to file a complaint, are there other strategies that we should use at the same time?

It is a good idea to identify strong women leaders in the community who are able to guide the work and ensure that you are aware of issues unique to women and girls. You may need to take extra measures to ensure that everyone can participate in the conversation, such as having separate women-only or youth-only meetings. Transforming Power is a guide to help communities campaigning on dams and for rivers to strengthen their gender practice and encourage campaigning in ways that are responsive to the interests of both women and men. You can find the guide here: <https://www.internationalrivers.org/resources/reports-and-publications/transforming-power-a-gender-guide-for-organizations-campaigning-on-dams-and-for-river/>

Before filing a complaint, discuss as a group what you hope to achieve. This may vary, especially among people who are directly and indirectly affected by a project. For example, one group of people may want to stop the project, while others may wish to receive fairer compensation. As these goals could potentially conflict, it is important to negotiate a common position before taking any action.

## Your Goals

Below are some goals that different people may wish to achieve when filing a complaint. Discuss these with your community members and anyone joining your complaint to ensure that your goals are aligned.

- ✓ Stop the project
- ✓ Prevent the project from starting
- ✓ Delay project construction until disputes are resolved
- ✓ Get fairer compensation for community members
- ✓ Call for an investigation to gather evidence that the community has been harmed, or will be harmed should the project go forward
- ✓ Bring political attention to the issue
- ✓ Raise public awareness and increase pressure on a bank or company to improve its behavior
- ✓ Encourage people to stop investing in a company that is harming local communities
- ✓ Pressure our government to promote sustainable development and strengthen social and environmental standards



Photo: Community meeting, Bissau Republic of Guinea | Shutterstock

# Collecting Evidence

Once your team is organized around common goals, the next step is to document how the project is affecting your community. You can do this by working together to collect and record evidence of how people have been harmed, or how they may face harm should the project go forward. Here are some different ways that you can collect evidence:

- Hold community meetings to discuss the impacts and make a list of all the impacts the project has caused.
- Select community interviewers to meet with individuals, families, and groups to discuss and document the impacts they are facing.
- Carefully observe any changes that are happening because of the project and document them by writing them down and taking photos or videos.
- Do community mapping activities by inviting community members to draw pictures of their homes, land, and resources, then mark the areas that have been affected by the project.
- Document any interaction with project developers and responsible government agencies, writing down the names of the people with whom you interacted, the dates, and the information they shared
- Record any steps your community has taken to



resolve the problem, including calls, meetings, or letters written to local government officials or project staff.

The more of this type of evidence you collect, the stronger your complaint will be. Doing this research will also help your community members to better

understand the problems they face, build confidence in their knowledge and ideas, strengthen solidarity, and learn the necessary skills to campaign for fairer development. Your research team should represent all the different types of people in the community, especially those who are often underrepresented. It is good to have an equal number of men and women. This will help you to understand how the project is affecting men and women differently, to make sure that women's voices are heard.

You may also reach out to allies such as university students, local civil society groups, or trusted government officials to help with your research. It is important for your community members

themselves to be at the center of this work, however, so that they are able to build upon their own knowledge, customs, and traditions, and stay in charge of the complaint process.

You can learn more about doing community-led research from this publication by International Accountability Project: <https://accountabilityproject.org/wp-content/uploads/2018/11/IAP-Comm-Act-Guide-web.pdf>

## CASE STUDY: the Nachtigal Hydropower Project in Cameroon

The Nachtigal hydropower project on the Sanaga River in Cameroon is being developed by the Nachtigal Hydro Power Company (NHPC), a consortium led by Électricité de France (EDF). The 420-megawatt capacity dam is funded by loans from international financial institutions like the World Bank, the European Investment Bank (EIB), the African Development Bank (AfDB) and the Dutch development bank FMO.

Dam construction began in 2018 and is expected to be completed in 2023. Before construction started, communities relied on the Sanaga River for fishing, sand excavation, agriculture, collection of non-timber forest products, and conducting traditional rites.

Despite promises made during the dam company's consultations, fishermen who agreed to stop fishing have not received any compensation. Those who continued fishing have received less compensation than agreed. A coalition of fisherfolk wrote letters to the company asking for the promised compensation but have still not received it. Residents who had previously collected sand along the river for sale have received less compensation than what they had previously earned, and some are still awaiting compensation.

Women have been particularly affected by the unsatisfactory compensation scheme. In nearly every case, the compensation has been given to men, and there is no specific mechanism in place for the consideration of women. Many women made a living from preparing and selling food to the sand workers, which they can no longer do. These same women have asked to be able to continue to prepare and sell food to the workers who are constructing the dam in order to make a living, but they have been prohibited from doing so.<sup>2</sup>



In addition to receiving unsatisfactory compensation for the loss of their livelihoods, local residents have not been given job opportunities on the dam site as promised. Low-wage laborers were brought in from other areas of Cameroon and abroad, and the large influx of men led to a greater risk of sexual violence against local women.

Residents claim that loss of income has resulted in an increase in the number of thefts, youth crimes, gender-based violence, prostitution, and divorces. In addition, they report that the number of mosquitoes has increased since forest was cut down to make way for the project. Diseases such as malaria and onchocerciasis (river blindness) are now more prevalent, and there is a lack of adequate medical resources to treat these diseases.

The company has given compensation to the community to move their sacred site, located in the dam construction area. The sacred site has been moved; however, the local community argues that this compensation is not enough to adequately hold traditional rites, as they no longer have access to the water and fish that were used in these rites.

The project has destroyed more than 2,000 hectares of forest, which has resulted in the destruction of medicinal plants and food insecurity. In their complaint, the local residents allege that the project will result in much higher CO2 emissions than was previously estimated in the Environmental and Social Impact Assessment (ESIA).

2. [https://www.banktrack.org/project/nachtigal\\_hydropower\\_plant/pdf](https://www.banktrack.org/project/nachtigal_hydropower_plant/pdf)

3. <https://www.bothends.org/en/Cooperation/Partner-organisations/Green-Development-Advocates-GDA/>

Community members felt unable to safely raise their concerns in consultation meetings conducted by the company due to intimidation. The company is using soldiers to deny local people access to the project area and the river, adding to the threatening atmosphere.

The local residents have filed petitions and written letters directly to the company asking them to uphold their promises regarding compensation, which remain unanswered. The company failed to let community members know that there was a project-level grievance mechanism to accept formal complaints.

In early 2022, IFI Synergy, a network of Cameroon-based NGOs, filed complaints on behalf of the affected communities to the Compliance Advisor Ombudsman (CAO), the accountability mechanism of the International Finance Corporation (IFC), the World Bank's Inspection Panel, and the AfDB's Compliance Review and Mediation Unit (BCRM). The complaints are co-signed by the chiefs of local villages, and by representatives of traditional sandmen, fishermen and fishmongers.

In 2022, the CAO assessed the complaint, and both the local people and the company have agreed to participate in a dispute resolution process. The CAO is now facilitating dialogues between the two parties to resolve the environmental and social issues raised in the complaint. The CAO is coordinating this effort with the independent accountability mechanisms (IAMS) of the other Development Finance Institutions who have received similar complaints.

## Choosing the Right Accountability Mechanism

Before filing a complaint, you must choose the accountability mechanism appropriate to your case. Some accountability mechanisms accept complaints from individuals, while others require more than one community member to file a complaint. Some accountability mechanisms have time limitations. The section below will explain the rules and procedures for each type of accountability mechanism.

The first step in choosing the right accountability mechanism is to find out which banks and companies are involved in the project that is causing harm. Look for the official project name and the company responsible on any signs that appear in your community or around construction sites.

You may also ask workers, surveyors, or local officials for information. You can then look at the websites of the companies and banks involved to see whether they have accountability mechanisms.

Depending on the accountability mechanism, it can be possible to file complaints against companies that are directly or indirectly responsible for harm. The company that owns the project and is overseeing the work is considered directly responsible. Those indirectly responsible include the banks that are funding the project, the company's investors, and its supply chain, meaning the companies providing the materials for the project.

## Development Finance Institutions

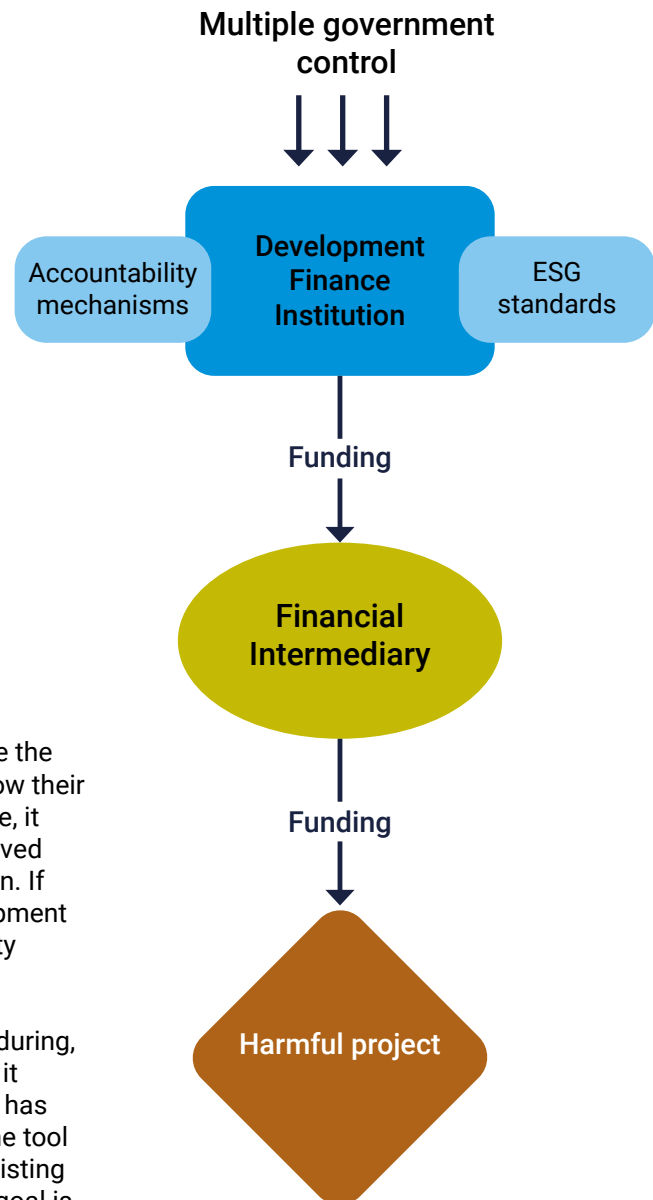
Development finance institutions are banks that aim to alleviate poverty and promote economic development. Governments control development finance institutions. Some, like the African Development Bank, are multilateral, meaning that they are controlled by many governments.

Development finance institutions often have relatively strong social and environmental standards compared to commercial banks and private companies. Many have independent accountability mechanisms so that people harmed by their investments can file complaints. Development finance institutions can either be directly involved in a project, or separated from the project by several layers of business relationships.

Development finance institutions are increasingly providing funding to financial intermediaries such as commercial banks. The financial intermediaries can then invest the development finance institution's money in projects as they see fit.

Many development finance institutions require the financial intermediaries they work with to follow their social and environmental standards. Therefore, it is important to find out if the project has received funding from a development finance institution. If so, you can file a complaint using that development finance institution's independent accountability mechanism.<sup>4</sup>

While it is possible to file a complaint before, during, or after a project is completed, it is best to do it as early as possible, ideally before the project has begun. The "Early Warning System" is an online tool that provides information on proposed and existing development projects around the world. The goal is to make sure that development is led by community members themselves, and that potentially destructive projects are stopped before their financing is approved by banks. You can find more information at <https://ews.rightsindevelopment.org/about/faqs/#dev>, and register for free to access the Early Warning System database at <https://ewsdata.rightsindevelopment.org/login/?next=/projects/>



4. Graphic and content from 2022 Inclusive Development International <https://www.followingthemoney.org/how-to-follow-the-money/>

# Dispute Resolution and Compliance Review

Most accountability mechanisms address complaints through two functions: 1) dispute resolution and 2) compliance review. In your complaint, you can specify whether you want to address the problems your community is facing through dispute resolution or compliance review. You can also choose both functions.

Dispute resolution provides an opportunity for direct dialogue with the company that is causing harm to your community. The presence of a mediator can help give your community more power in negotiating with the company. Through the process, you can make your priorities clear, and negotiate for specific solutions. You can stop the process at any point if you feel it is not effective at addressing your problems. However, dispute resolution is a voluntary process, the company may not agree to participate, or may not sincerely intend to address the problems you are facing. The process may take several years, and requires strong community organizing. It is also important to consider security concerns, as dispute resolution usually requires face-to-face meetings with the company.

Compliance review is a process of assessing whether the bank has violated its own social and environmental policies and caused harm to your community. Sometimes the compliance review team talks to the community about how to address problems, but community members usually play less of a role in determining priorities and solutions. While this means that compliance review takes up less of the community's time, the process may not address your concerns satisfactorily. Also, the compliance report may not lead to the change you hope to see, as accountability mechanisms do not have the power to enforce their findings and recommendations.

The following section lists some of the major accountability mechanisms, along with the rules and procedures for filing a complaint. As each of the mechanisms has slightly different rules, we have provided a step-by-step guide to each of them. We have also included a list of organizations in the resources section that can help you research banks and companies, and prepare and submit your complaint.



Photo: Lake Turkana | International Rivers



# Accountability Mechanisms

## The African Development Bank (AfDB)

The African Development Bank (AfDB) supports public and private sector projects in 54 countries on and around the African continent. The Independent Review Mechanism is the African Development Bank's accountability mechanism. It was designed to make sure that the African Development Bank follows its own policies during the design and implementation of its projects. Two or more people who are experiencing or anticipate serious social or environmental impacts as the result of an African Development Bank-funded project can file a complaint with the bank's Independent Review Mechanism. You can also appoint a representative from your country to submit the complaint for you, though you will still need to include your name on the complaint. You can appoint a representative from a foreign country only if you cannot find someone within your own country. To submit a complaint, you must live in the area affected by an African Development Bank-funded project. You can submit a complaint up to 24 months after the entire loan for the project has been given out or the project has been completed.

Any public or private company that has received a loan from the African Development Bank must follow the bank's Integrated Safeguards System, which includes Operational Safeguards (OS) to protect local communities and the environment, Environmental and Social Assessment Procedures, and Integrated Environmental and Social Impact Assessment Guidelines. If you feel that the company has violated any of these policies, you can submit a complaint.

### Following is a summary of the African Development Bank's Operational Safeguards:

#### OS1 Environmental and Social Assessment:

Establishes the importance of determining and minimizing a project's environmental and social impacts.

**OS2 Involuntary Resettlement:** Aims to ensure that, when physical or economic resettlement cannot be avoided, people should be treated fairly, receive compensation or resettlement assistance to improve their standard of living, and share in the benefits of the project.

#### OS3 Biodiversity and Ecosystem Services:

Establishes that companies implementing projects should avoid impacts on biodiversity and ecosystem services. When direct and indirect impacts are unavoidable, the companies should implement measures to minimize the impacts and restore biodiversity and ecosystem services.

**OS4 Pollution Prevention and Control, Hazardous Materials and Resource Efficiency:** Aims to manage and reduce project related pollutants that could harm human health and the environment; and sets a framework for efficiently using natural resources, especially energy and water.

**OS5 Labor Conditions, Health and Safety:** Maintains that workers' rights should be protected and remain consistent with national legal requirements. This includes protection from abuse and exploitation and avoidance of child labor.

### Preparing the Complaint

You can write the complaint in English, French, or your local language. The complaint should include the following information:

- The date, name and signatures of the affected people, whether they wish their identities to remain confidential, and if so why. If you are designating an individual or an organization to represent you, include their name along with a signed statement that authorizes them to act as your representative.
- A short description of the project and, if possible, the African Development Bank policies that you feel the project is violating.
- An explanation of the harm, or expected harm, to your community resulting from the project.
- What change you would like to see as a result of the complaint process.
- Documentation of any communication you have

already had with African Development Bank staff about the project, including the names of the people you spoke or wrote to, and on what dates.

- Supporting materials, such as a description of the location of the affected area.

You can submit your complaint by sending it by email or mail to:

Compliance Review and Mediation Unit (CRMU)  
African Development Bank  
01 P.O. Box 1387 -Abidjan 01, Cote d'Ivoire  
2nd Floor, CCIA Building, Abidjan Plateau  
Avenue Jean-Paul II  
T +225 20 26 29 56  
Email: [complaints@afdb.org](mailto:complaints@afdb.org)

If you are not able to submit a written complaint, you can contact the Compliance Review and Mediation Unit and they will assist you. You can also submit the complaint to your country's African Development Bank field office. Be aware, however, that submitting a complaint directly to a country office may trigger security concerns, as local bank staff and management do not have to comply with confidentiality requests. You can find the addresses of field offices here: <http://www.afdb.org/en/countries/>.

## The Complaint Process

When submitting a complaint to the Independent Review Mechanism, you can request assistance in

the form of mediation and/or compliance review. Mediation aims to initiate or restore dialogue between the community and the company, and to solve problems without assigning blame. A compliance review assesses whether the African Development Bank's policies have been properly followed.

Once the Compliance Review and Mediation Unit receives your complaint, the director will do a review within 14 days to assess whether your community has been harmed by an African Development Bank-funded project. If so, the director will ask African Development Bank management to respond within 21 days. The director will then begin either mediation or compliance review, based on what the people filing the complaint request. If you request both mediation and a compliance review, the Bank will do mediation first.

For mediation, the director will check to see whether both the project owners and the affected community members agree to participate. If they both agree, the Compliance Review and Mediation Unit will collect information on the case and start dialogues between the company and the community. If it is found that the project may have violated African Development Bank policy, the director can recommend a compliance review.

For a compliance review, Independent Review Mechanism experts investigate further to determine if a project has violated Bank policies, and if so,



Photo: Community meeting, Bissau Republic of Guinea | Shutterstock



Photo: Youth leader at Action Femme Et Eco-Justice (AFECOJU), DRC speaks at Women and Rivers Congress | International Rivers

what specific policies have been violated. The investigation may include a visit to the project site and meetings with affected communities. The experts then make recommendations to the Bank, and the Bank management has 90 days to respond and prepare an action plan. The action plan could entail instructing the bank's management to redesign the project to prevent further harm, ordering compensation or remedy for any harm you have experienced, or canceling the project.

The Bank's board or president may either accept or reject the findings and recommendations, and their decision is published on the African Development Bank website. If the Bank approves the action plan, the Independent Review Mechanism follows up to make sure that it is followed.

Once you submit your complaint, if you do not hear from the Compliance Review and Mediation Unit within 14 days, you can check with them to ensure that the process is moving along. It is often

helpful to speak to members of the Bank's board, as they are the ones who decide what to do with the Compliance Review and Mediation Unit's report. Many communities have found it useful to contact the Bank's board members as soon as they file their complaint in order to establish a direct relationship for easier follow-up later in the complaint process.

### **Managing Expectations**

The Independent Review Mechanism process can take several years, and require a lot of time and resources. Submitting a complaint cannot guarantee that an investigation will be done. It also cannot guarantee that harm caused by an African Development Bank-supported project will be stopped or prevented, force a company to participate in a voluntary problem-solving process, assign blame, or lead to findings that a company or the African Development Bank is 'guilty.' Submitting a complaint will, however, bring your problems to the attention of the African Development Bank board and directors.

## The World Bank Group

The World Bank Group is an international development bank that aims to reduce poverty and improve living standards by supporting both government and private sector investments. Although the World Bank Group seeks to promote “sustainable development,” its activities can harm communities and the land and water resources that they rely upon. To ensure communities and the environment are not harmed by its projects, the World Bank must follow the policies set out in its Environmental and Social Framework. If you feel that the World Bank has violated any of its policies by funding a project in your area, you can file a complaint.

The World Bank Group has two accountability mechanisms: the Inspection Panel and the Compliance Advisor Ombudsman (CAO). The World Bank Inspection Panel is for projects financed by the World Bank’s International Bank for Reconstruction and Development (IBRD) or International Development Association (IDA), and the CAO is the accountability mechanism for projects supported by the World Bank Group’s International Finance Corporation (IFC) and Multilateral Investment Guarantee Agency (MIGA). The World Bank Inspection Panel addresses complaints regarding public finance (government) investment, and the Compliance Advisor Ombudsman addresses complaints regarding private finance (companies).

If your community is facing harm or the threat of harm from a World Bank-funded project, the first step is to determine which part of the World Bank Group is supporting that project, then choose the accountability mechanism that is relevant to your case. Following is a guide to filing complaints with the World Bank Inspection Panel and the Compliance Advisor Ombudsman (CAO).



Photo: Congo River | International Rivers

## The World Bank Inspection Panel

Any two or more people affected by a World Bank-financed project may bring a Request for Inspection (or “complaint”) to the World Bank Inspection Panel. To do this, you must live in the area that is affected by the project. You can appoint a local organization to submit a complaint on behalf of your community, as long as the organization provides documentation authorizing it to represent you. A foreign non-governmental organization (NGO) can only submit the complaint if you cannot find a group within your country to do so.

The complaint must address a harm that you are currently experiencing or are likely to experience from a project with at least some funding from the World Bank’s IBRD or IDA. In the complaint, you should explain how the harm is related to the World Bank’s failure to follow its Environmental and Social Framework. When your government borrows money from the World Bank to finance a development project, it must also follow these standards.

### World Bank Environment and Social Framework policies include:

**4.01 Environmental Assessment:** have the potential environmental risks, impacts and alternatives of the project been properly evaluated?

**4.02 Environmental Action Plan:** has your government prepared an Environmental Action Plan with broad public participation and full public disclosure?

**4.03 Performance Standards for Private Sector Activities:** if the project is designed, owned, constructed, and/or operated by a private entity, is that entity following World Bank Performance Standards in regards to environmental and social risks and impacts, involuntary resettlement, indigenous people, etc.?

**4.04 Natural Habitats:** has the project properly incorporated the conservation of biodiversity and the various environmental services that natural habitats provide?

**4.10 Indigenous Peoples:** has a process of free, prior and informed consultation of the affected people at each stage of the project been conducted, including social assessments to evaluate positive and adverse effects of the project on local people?

**4.12 Involuntary Resettlement:** has the project provided a resettlement plan or policy framework that covers direct economic and social impacts, and includes information disclosure, consultation and compensation?

**4.36 Forests:** does the project follow the World Bank directive to protect the vital local and global services that forests provide?

**4.37 Safety of Dams:** are experienced and competent professionals supervising the design and construction of dams, and are proper safety measures being implemented?

A full list of World Bank environmental and social policies is available at: <https://www.worldbank.org/en/projects-operations/environmental-and-social-policies>

You can only submit a complaint to the Inspection Panel after you have tried in “good faith” to address the problem by sending letters or requesting meetings with World Bank staff. You may start by writing a letter or requesting a meeting with the Bank staff in charge of a project, such as the Task Team Leader. If you receive no response, you can contact the Bank’s Country Director or the Executive Director representing your country on the World Bank’s Board. The civil society organizations listed in the resources section below can help you to do this.

### Filing a Complaint

Your complaint should include:

- Your names (there must be two or more Requesters), and where you live. If you are appointing an individual or an organization to represent you, their name, along with a signed statement that authorizes them to act as your representative, needs to be included.
- Information about whether you wish the Inspection Panel to keep your identity confidential. Although you must provide your name on the complaint, the Inspection Panel will keep it confidential if you request.
- Title (if you know it) of the World Bank–supported project that you are concerned about.

- Description of the harm that you—or the environment where you live—have experienced or the harm that you believe is likely to occur as a consequence of the project.
- A description—to the extent that you know—of why you believe the World Bank has failed to follow its policies and procedures, and how that has resulted in harm (a Request for Inspection does not need to identify any specific Bank policies to be considered).
- An explanation of when and how you informed the World Bank about your concerns and why you are not satisfied with the Bank’s response. For example, if you have sent letters or had meetings with World Bank staff about the problems you are facing, include copies of the letters or meeting notes.
- If you wish, you can describe the change you wish to see as a result of the complaint process.

You can download a complaint request form here: <https://www.inspectionpanel.org/how-to-file-complaint>

If you have any questions or need help in filing a complaint, you can contact the Inspection Panel directly or seek help from the civil society organizations listed in the resources section below. These organizations can also help you to follow up with the Inspection Panel after your complaint has been submitted.

English is the official language for the Inspection Panel process, but you can submit a complaint in your own language. You can submit the complaint via email, fax or mail to:

E-mail: [ipanel@worldbank.org](mailto:ipanel@worldbank.org)  
 Phone: +1 202 458 5200  
 Fax: +1 202 522 0916 (Washington, DC).  
 Mail: Inspection Panel, Mail Stop MC10-1007, 1818 H Street, NW, Washington, DC 20433, USA.

The complaint may also be filed with a World Bank office in your country. Here is the contact information of the World Bank offices in Sub-Saharan Africa: <http://web.worldbank.org/archive/website00283B/WEB/CONTAC-2.HTM>



Photo: Kandanji community | International Rivers



Photo: Women's meeting | Shutterstock

### **The World Bank Inspection Panel Process**

Once the Inspection Panel receives a complaint, it will notify the public via its website and decide whether or not it will be able to accept the complaint within 15 business days. If the Panel accepts the complaint, it forwards it to World Bank management, which has 21 business days to respond to the issues raised. The Panel then has another 21 business days to decide whether the complaint is eligible for an investigation. During this time, the Panel may make a visit to the project site and meet with affected community members. The Panel then makes a recommendation to the World Bank Board about whether the complaint should be investigated. If the Board approves an investigation, the Panel may visit the project site and talk to the community members again. The panel will also review relevant documents, and interview World Bank staff and consultants who worked on the project.

When the investigation is complete, the Panel submits a final report to the World Bank board

and management summarizing whether or not the World Bank has properly followed its own policies and procedures. Based on the Panel's report and management's recommendations, the board will decide what steps should be taken to remedy the harm, or expected harm, caused by the project. The Panel and management's final reports, and the Board's decision, are made public promptly after the board meeting. The people who filed the complaint cannot appeal if they disagree with the board's decision.

### **Managing Expectations**

It is important to keep in mind that submitting a complaint to the Inspection Panel cannot guarantee that harm from a World Bank-supported project will be stopped or prevented. The Panel has no power to order problems to be fixed, and cannot give compensation to victims. The most the Panel can do is to issue a report about the violations to the World Bank board, which then decides what to do in response.

## The Compliance Advisor Ombudsman (CAO)

Any individual or group that believes they are, or may be harmed by a project funded by the World Bank's International Finance Corporation (IFC) and Multilateral Investment Guarantee Agency (MIGA) can submit a complaint to the Compliance Advisor Ombudsman (CAO). You can appoint a representative to submit a complaint on behalf of your community, as long as they provide documentation authorizing them to represent you. Complaints may be made before the start of the project, while the project is being constructed, is ongoing, or after the project has been completed. However, it may be more difficult to address a problem once the IFC or MIGA have ended their relationship with the project.

The IFC provides financing to private companies conducting business in developing countries. IFC loans have supported companies to build and operate hydropower dams, oil and gas pipelines, and mining that have caused harm to communities and the environment. Any company receiving support from the IFC must follow the IFC Performance Standards on Environmental and Social Sustainability. You can make a complaint to the CAO if you feel that any of these policies and standards have been violated.

### The eight IFC Performance Standards are:

- 1. Assessment and Management of Environmental and Social Risks and Impacts:** Establishes the importance of identifying the environmental and social impacts of a project; engagement with local communities; and the management of environmental and social performance throughout the project.
- 2. Labor and Working Conditions:** Recognizes the importance of protecting workers' rights, as well as promoting non-discrimination and equal opportunities in safe and healthy working conditions.
- 3. Resource Efficiency and Pollution Prevention:** Aims to avoid negative impacts on health and the environment by minimizing pollution from projects, promoting sustainable use of resources and reducing project-related greenhouse gasses.
- 4. Community Health, Safety and Security:** Addresses the responsibility to avoid risks to community health, safety and security as a result of project activities. Ensures the safeguarding of personnel and property in accordance with human rights principles.
- 5. Land Acquisition and Involuntary Resettlement:** Stresses that involuntary resettlement should be avoided, and if it is unavoidable, it should be minimized and appropriate measures should be taken to mitigate adverse effects on affected individuals or communities.
- 6. Biodiversity Conservation and Sustainable Management of Living Natural Resources:** Companies should avoid impacts on biodiversity and ecosystem services, and when impacts are unavoidable, they should implement measures

to minimize impacts and restore biodiversity and ecosystem services. This includes direct and indirect impacts that are related to projects.

- 7. Indigenous Peoples:** Ensures that the development process respects the human rights, dignity, aspirations, culture and natural resource-based livelihoods of Indigenous Peoples. It also requires free, prior, informed consent of indigenous communities.
- 8. Cultural Heritage:** Recognizes the importance of cultural heritage for current and future generations and requires that the client should identify and protect cultural heritage.

In addition to these Performance Standards, the IFC itself must adhere to its Policies on Environmental and Social Sustainability and Access to Information. You can visit [www.ifc.org/sustainability](http://www.ifc.org/sustainability) to view these policies in detail.

### Filing a Complaint

When filing a complaint, it is helpful to identify which specific Performance Standards you feel have been violated, or will be violated as a result of the project. Your complaint will also be stronger if you can identify which companies you believe to be involved.

Your complaint to the CAO should include:

1. The date, name and signatures of the individual or group of people affected by the project, whether they wish their identities to remain confidential and if so why, and the name of any representatives assisting the affected person or group, with a signed letter providing proof of authority to provide the representation.



2. A brief description of the IFC or MIGA project and any rules that may have been violated.
3. An explanation of the social or environmental harm, or expected harm, as a result of the IFC or MIGA project.
4. A description and record of any steps you have already taken to try to resolve the problem with the company, IFC or MIGA.
5. A description of the change you would like to see as a result of the CAO process.
6. Evidence of harm or potential harm, such as photographs, videos, written notes.

You may submit the complaint to the CAO in any language via email, fax or mail to:

Office of the Compliance Advisor Ombudsman  
(CAO)  
2121 Pennsylvania Avenue, NW  
Washington, DC 20433  
United States of America  
Tel: + 1 202 458 1973  
Fax: + 1 202 522 7400  
Email: cao-compliance@ifc.org

If you have any questions or need help in filing a complaint, you can contact the CAO directly or ask for help from the civil society organizations listed in the resources section below. You can find a sample complaint online at: <http://www.cao-ombudsman.org/>.

## THE CAO Complaint Process

Upon receiving a complaint, the CAO has 15 days to decide whether or not it is eligible. If the complaint is not eligible, the case is closed. If the complaint is eligible, the CAO does a 120-day assessment to understand the issues raised in the complaint, talk to the people involved on each side, explain the different ways that the CAO can help to resolve the problem, and determine how all parties would like to move forward.

The CAO has two functions: dispute resolution and compliance.

If the CAO sees an opportunity to reach a solution through dispute resolution, it may set up a mediation for communities and companies to address grievances. Community members can also proactively request that the CAO set up a dispute resolution process. Dispute resolution can only happen if the company agrees to participate in the mediation process voluntarily, however. Even when companies agree to participate, if they do not enter the process in good faith, it is unlikely that they will make meaningful progress towards addressing a dispute. If dispute resolution is not possible, or if at any point the company or the community members filing the complaint no longer wishes to be a part of the process, the complaint is transferred to the CAO's compliance function.



Photo: Community meeting Nigeria | Shutterstock

In the compliance phase, the CAO takes 45-days to determine whether the case will require a full investigation or not. The investigation may include a review of documents, site visits, and interviews with local people. The CAO then publishes a report on the CAO website after the World Bank President approves it. If the CAO's investigation finds that the IFC has not followed its own rules, the CAO will keep the case open to monitor the IFC's actions until the problem has been resolved.

You can work with civil society organizations to ensure that the CAO and the World Bank Group properly monitors and reports on any agreements made, and that they follow up on their commitments to address the harm that your community is experiencing.

### **Managing Expectations**

It can take several years to complete the CAO

process. Filing a complaint does not guarantee that the CAO will conduct an investigation of a project. Filing a complaint also cannot guarantee that harm being caused by an IFC or MIGA-supported project will be stopped or prevented. The CAO cannot force a company to participate in a voluntary dispute resolution process; if a company refuses to cooperate, the process ends. Filing a complaint cannot lead to a finding that the company or the IFC is "guilty;" it can only reveal whether IFC or MIGA standards were violated.

On the other hand, submitting a complaint to the CAO may help you to resolve the problem you are facing. It may bring the problem to the attention of World Bank leadership, who may be able to remedy the harm. It may also create a record of the IFC or MIGA's violations of their rules through a compliance investigation, which can strengthen your advocacy campaign against the project and to prevent similar problems from happening in the future.



Photo: Himba woman | Shutterstock

## Chinese Investment and the Asian Infrastructure Investment Bank (AIIB)

In recent years, there has been a big increase in Chinese investment in Africa. The African Development Bank has signed agreements with major Chinese banks such as the Export-Import Bank of China, China Development Bank and the Agricultural Bank of China through the China-Africa Development Fund to support and encourage Chinese companies to invest in Africa.

In 2022, the Chinese government set up the Green Finance Guidelines asking Chinese banks to set up accountability mechanisms for communities affected by the projects they fund. It is still not clear, however, when these guidelines will start to be used, and how they will work.

For now, if a project that is owned or operated by a Chinese company is causing harm to your community, it may be best to contact host government offices or civil society groups in your home country for help. If you are not able to find help in your country, regional organizations such as the African Commission may be of assistance. It is also important to be aware that new mechanisms to file complaints with project builders, financiers or directly with Chinese Ministries and agencies may become available after the writing of this Guide.

One thing that almost all Chinese policies for overseas investment have in common is that they call on companies and banks to respect the laws of the countries where they are working. If you can identify how a Chinese bank or company has broken your own country's laws, you can use that information to pressure the Chinese investors to take action to solve the problem.

If you try to talk to a Chinese company directly and do not get a good response, you can try to contact the Chinese embassy in your country, the company's headquarters in China, or to the bank's office in China, and the Ministry of Commerce in Beijing.

The one Chinese bank that has already set up an accountability mechanism is the Asian Infrastructure Investment Bank (AIIB). If you are harmed by a Chinese-funded project, you can check to see whether it's backed by the AIIB, and if so, file a complaint. You can find that information here:

AIIB approved projects: <https://www.aiib.org/en/projects/approved/index.html>

AIIB proposed projects: <https://www.aiib.org/en/projects/proposed/index.html>

### The Asian Infrastructure Investment Bank (AIIB) Project-affected People's Mechanism

The Asian Infrastructure Investment Bank (AIIB) is a multilateral bank, meaning that it is owned by a group of countries. China has the most control over decision-making at the AIIB because it holds the largest ownership share of the bank compared to any other country.

Governments and companies that receive support from the AIIB must follow the AIIB's Environmental and Social Standards. The goal of these standards is to ensure that no harm is done to people and the environment. Under these standards, people who are likely to be affected by an AIIB-supported project must have access to information and be properly consulted. Companies are also responsible for

making sure that any contractors that they hire to work on a project follow these standards.

### The AIIB's Environmental and Social Standards cover:

1. **Environmental and Social Assessment and Management:** Governments or companies receiving AIIB funding must follow these standards to assess and manage environmental and social impacts of projects.
2. **Involuntary Resettlement:** Governments or companies receiving AIIB funding must follow these standards if the project will take people's land, resulting in resettlement of communities, or affecting their livelihoods, including their access to natural resources, jobs or income.



**Photo:** Participant speaks on relationship between women's leadership and river conservation at the 2019 Women and Rivers Congress | International Rivers

**3. Indigenous Peoples:** Governments or companies receiving AIIB funding must follow these standards if the project will impact Indigenous Peoples, their land and natural resources.

You can find detailed descriptions of each of these standards here: [https://www.aiib.org/en/policies-strategies/\\_download/environment-framework/Final-ESF-Mar-14-2019-Final-P.pdf](https://www.aiib.org/en/policies-strategies/_download/environment-framework/Final-ESF-Mar-14-2019-Final-P.pdf)

According to the Environmental and Social Standards, all AIIB-supported projects must put in place project-level grievance mechanisms to receive complaints and resolve problems. The project-level grievance mechanism may be a telephone hotline, a complaint box, a community liaison officer, or a complaint window at the company or local government office. The project owner must inform your community from the beginning that this mechanism exists, so that if you have concerns or experience negative impacts, you are able to express this in a way that is culturally appropriate, gender-sensitive and readily accessible.

If you do not receive a satisfactory response from the project-level grievance mechanism, if it takes too long, or if you do not feel safe using it, you may file a complaint (called a "submission") directly to the AIIB's Project-affected People's Mechanism (PPM). The Project-affected People's Mechanism is an independent accountability mechanism managed by

the Complaints-resolution, Evaluation and Integrity Unit (CEIU) of the AIIB.

### Filing the Complaint

Your complaint should include the following information:

1. Your name, address, contact details and preferred mode of contact.
2. If you are using an authorized representative, include their name, contact details and proof that you have authorized them to file a submission on your behalf.
3. If you or your authorized representative wish to make the submission confidential, and if so, provide the reasons why.
4. Name and location of the AIIB-financed project that is causing harm.
5. Describe the negative environmental or social impact the project is causing.
6. If possible, you can mention which of the AIIB's Environmental and Social Policies you feel are not being followed.
7. Describe any steps you have taken to solve the problem, such as sending letters or requesting meetings with the project owner, talking to your government, filing a lawsuit, writing to AIIB management, or using a project-level grievance

mechanism. Explain why these efforts to solve the problem did not work.

8. Explain how you want to see the problem solved.
9. If possible, mention whether you are submitting a Project Processing Query, Request for Dispute Resolution or Request for Compliance Review (more information about this below).

A sample submission form can be found here: <https://www.aiib.org/en/about-aiib/who-we-are/project-affected-peoples-mechanism/how-we-assist-you/rules/pdf/Attachment-Two.Sample-Submission-Form.pdf>

You can send your complaint in your own language, but it will be read and acted on more quickly if you can translate it into English. Send your complaint by email, fax, or mail to:

Managing Director, Complaints-resolution, Evaluation & Integrity Unit (CEIU)  
Asian Infrastructure Investment Bank (AIIB),  
Tower A, Asia Financial Center, No.1 Tianchen East Road, Chaoyang District, Beijing 100101  
Email address: ppm@aiib.org  
Fax Number: +86-10-8358-0003

Your community may also request a meeting with the AIIB to discuss the situation in more detail. It can be helpful for AIIB staff to meet community representatives face to face and listen to your experiences in person. This can be much more powerful than just sending a letter or email. However, as all AIIB staff are based in Beijing, meeting them can be difficult. If you think it is too risky or difficult to meet with the AIIB in your country, you can ask for support from a civil society organization to help you raise the problems with the project with the AIIB.

### The AIIB Complaint Process

Once a project has been posted on the AIIB's website as "proposed", you may submit a complaint. In the complaint, it will be useful to say whether you are making a Project Processing Query, Request for Dispute Resolution or Request for Compliance Review.

A Project Processing Query aims to quickly address relatively simple matters that come up during the preparation of a project, such as dust, noise, or lack of consultation with your community. After the bank has approved the project, this function can no longer be used.



Photo: Community meeting Burkina Faso | Shutterstock

If you experience problems once the project has begun, Dispute Resolution can be used to set up negotiations between your community, the AIIB, and/or the company or government office involved in the project with the assistance of a mediator. Negotiations are only possible if your community members and the project owners agree to participate. If the dispute resolution process is successful, both sides will usually develop a written agreement on what steps will be taken to address the dispute.

You can request a Compliance Review from the beginning, or at any time in the Dispute Resolution process if you are not happy with the results. If you request a Compliance Review, the Project-affected People's Mechanism will assess your complaints and decide whether the AIIB has failed to follow its own policies. If a formal investigation is approved by the AIIB Board of Directors, a task force will be created to review the complaint. This may involve interviews with local people, government authorities, company staff, and AIIB representatives.

When the investigation is finished, it prepares a report explaining whether or not the AIIB followed its own policies properly and whether it has harmed your community. If it is found that your community has been harmed, AIIB Management will prepare a plan setting out steps to fix the problem. This plan must be made public, and shared with the people who made the complaint.

### **Managing Expectations**

As the AIIB is a fairly new bank, its policies on environmental and social standards are still not strong. At the time of writing this Guide, no communities have used the AIIB accountability mechanism.

The AIIB often co-finances projects with other banks. If you find that another bank is involved, the other bank's policies and accountability mechanisms will apply to the project, rather than those of the AIIB. The best way to

check whether another bank is involved is to visit the AIIB website and look at the Project Summary Information. The Independent Accountability Mechanism section at the end of the document will identify any other banks involved. Please refer to the following link as an example: [https://www.aiib.org/en/projects/details/2021/\\_download/rwanda/AIIB-PSI-P000462-Rwanda-Digital-Acceleration-Project-December-21-2021.pdf](https://www.aiib.org/en/projects/details/2021/_download/rwanda/AIIB-PSI-P000462-Rwanda-Digital-Acceleration-Project-December-21-2021.pdf)

It is important to keep in mind when using the Project-affected People's Mechanism that if the AIIB is found to have violated their own policies, they will develop a plan to address these problems, but will not necessarily stop the project. Even so, a compliance review report that confirms the concerns of your community can be very useful in your advocacy efforts.



Photo: Community meeting | International Rivers

## The OECD Guidelines for Multinational Enterprises

The Organization for Economic Co-operation and Development (OECD) is an organization made up of member countries that agree to adhere to the OECD Declaration and Decisions on International Investment and Multinational Enterprises. The OECD's 'Guidelines for Multinational Enterprises' (OECD Guidelines) are recommendations from the OECD countries to businesses regarding responsible conduct in their work around the world.

All 51 governments that adhere to the OECD Guidelines have the legal obligation to set up a National Contact Point for Responsible Business Conduct to handle complaints about 'specific instances' of problems caused by overseas investment. If you are suffering from human rights or environmental problems caused by a foreign company, the first step is to find out whether that company is owned or financed by an OECD member country or OECD-adhering country. If it is, you can make a complaint to your National Contact Point. If your country does not have a National Contact Point, you can submit your complaint to the National Contact Point of the country where the company has its headquarters.

Any 'interested party' can file a complaint. This includes trade unions, workers and NGOs as well communities and individuals who are harmed by a company's activities. You can file a complaint regarding harm that occurred in the past and has not been sufficiently addressed by the company, for harm currently occurring, or for harm that may occur if a company goes ahead with planned activities. This includes any harmful impact through the company's supply chains and business relationships.

The civil society network OECD Watch ([www.oecdwatch.org](http://www.oecdwatch.org)) holds trainings for people who are considering filing complaints, and provides detailed advice on the complaint process. OECD Watch can also help you map the relationships between the various businesses involved in the project that is causing you harm, such as parent companies, subsidiaries, joint ventures, financiers, and supply chain partners, and help you identify the correct National Contact Point for your complaint.

### Here is an overview of some key OECD Guidelines:

#### Chapter II General Policies

Enterprises should operate in accordance with domestic laws and regulations, and in a manner that contributes to sustainable development. They should assess, prevent and mitigate all harmful impacts arising from their own activities and throughout their supply chains and other business relationships. Enterprises should engage meaningfully with stakeholders, and uphold good corporate governance principles.

#### Chapter III Disclosure

Enterprises should disclose all material matters regarding their activities, structure, financial and non-financial (i.e. social and environmental) performance, ownership and governance. Enterprises should also disclose information about their business relationships and activities and the impacts of those relations.

#### Chapter IV Human Rights

Enterprises should respect human rights. They should assess and address actual and potential human rights impacts, and have processes to address human rights issues.

#### Chapter V Employment and Industrial Relations

Enterprises should honor labor rights and provide decent working conditions and wages that satisfy the basic needs of workers and their families.

#### Chapter VI Environment

Enterprises should identify, prevent and mitigate harmful impacts to the environment and public health and safety. They should establish an environmental management system and continually improve environmental performance, including reducing greenhouse gas emissions.

#### Chapter VII Bribery and Corruption

Enterprises should not offer or accept bribes, either directly or indirectly.

## Filing a Complaint

Your complaint should include:

1. The identity of the individual(s) or organization(s) filing the complaint. You can ask the OECD to keep this information confidential.
2. A description of the harm that has occurred and which companies you believe to be responsible or involved.
3. The OECD Guidelines that you feel have been violated
4. Evidence supporting your claim that harm is occurring
5. What you want the company involved to do to address that harm
6. What you want the National Contact Point to do to help, such as facilitate mediation, do fact-finding, assess whether a company has violated OECD Guidelines, or make recommendations.

You can follow this template from OECD Watch to write your complaint: <https://www.oecdwatch.org/how-to-file-a-complaint/stage-two-preparing-and-filing-the-complaint/template-for-complaint/>

You can submit your complaint to the appropriate National Contact Point by email or by post.

## The OECD Complaint Process

Firstly, the National Contact Point will consider whether the complaint is eligible. They will likely contact you for additional information and clarification. If the complaint is eligible, the National Contact Point will bring the community members and the company together for mediation to try to reach a mutual solution. If mediation fails, the National Contact Point can assess whether the company has violated OECD Guidelines, and make recommendations on how the company can better follow the Guidelines.

At the end of the process, the National Contact Point should issue a public statement. If mediation was successful, the statement should outline the issues, process and joint agreement reached. If mediation fails, the statement should outline recommendations to the companies involved, and how these recommendations should be monitored and followed up.

Although filing an OECD complaint cannot guarantee that a company will change its behavior, it can provide a way to address problems, help to improve the situation, and raise public awareness around the problems you are facing.

## The African Commission on Human and Peoples' Rights (African Commission)

The African Commission on Human and Peoples' Rights promotes and protects human rights as guaranteed under the African Charter on Human and Peoples' Rights (African Charter). The 53 African countries that have signed the African Charter are known as member states. An individual, community, organization, or member state may make a complaint to the African Commission if they feel that an individual or community's rights under the African Charter have been violated. The African Commission calls this complaint a "communication."

The African Commission ensures that the countries that have signed the African Charter are doing their duty to protect their citizens' rights. The African Commission can only consider complaints for violations of rights by African Charter member states. This means that you may file a complaint only if you are ready to show that your government has failed to protect your rights and the rights of your community.

You can file a complaint against a state-owned company by showing that the company is causing harm to citizens of your country. To file a complaint against a private company, you must show that your government has failed to protect its citizens by allowing the private company to cause them harm.

The Commission will consider the complaint, and may contact the people making the complaint for more information. If the Commission decides to accept the complaint,



it will forward it to the government of the country where the human rights violation occurred and ask that government to respond within three months. If the people making the complaint and their government representatives both agree to negotiate, the Commission can appoint a mediator to help reach an agreement.

The Commission can also make recommendations to your government to ensure that the case is investigated, that victims are compensated, or that steps are taken to make sure that the human rights violations do not continue. The African Commission has no way to force your government to act on its recommendations, however. If the African Commission considers that a state has not adequately addressed human rights violations, it may refer the case to the African Court on Human and Peoples' Rights. The African Court is located in Tanzania, and the decisions of its judges are legally binding, meaning that they can be enforced by law.

### Preparing a complaint to the African Commission:

1. Who is violating your rights, or the rights of your community? Remember that the African Commission only considers complaints for violations by State Parties to the African Charter; that is, your government. You must show how your government is responsible for human rights violations. For example, did your government fail to prevent a company from harming your community? Once your government realized that the company was violating your community members' rights, did it fail to investigate and punish whoever was responsible? Did your government directly support the company, or contribute to causing harm to your community?
2. Read the African Charter here: [https://www.achpr.org/public/Document/file/English/banjul\\_charter.pdf](https://www.achpr.org/public/Document/file/English/banjul_charter.pdf) Are the human rights violations you suffered included in the Charter? List which of the rights listed in the Charter were violated.
3. Gather evidence to show that you have tried and failed to use the laws of your country to solve the problem. Have you filed any lawsuits or made complaints according to your own country's laws and policies? Why have these not succeeded?
4. To make your complaint stronger, you can contact a civil society organization or lawyer for help.
5. Write the complaint. The complaint should include the following information:
  - The name and details of the people making the complaint, and whether they want their information to remain confidential. Individuals may also choose to have legal representatives assist them.
  - The name of your country and the titles of the government authorities involved in the human rights violation.
  - A description of the human rights violation, including dates, times and places. Be as specific as possible, and include first-hand information in addition to media reports. Including photos and videos will make your complaint stronger.
  - If possible, list which rights under the African Charter you feel have been violated.
  - Include the names and contact information of witnesses. Be careful to first make sure that they agree to be named in the complaint.
  - Explain how you have tried and failed to use the laws of your country to solve the problem.
  - State whether your complaint is already being considered by any other international human rights system.
  - If the matter is urgent, explain how.
6. File your complaint by sending it in writing to the Secretary or Chairman of the African Commission on Human and Peoples' Rights at the following address:

The African Commission on Human and Peoples' Rights  
No. 31 Bijilo Annex Layout  
Kombo North District, Western Region  
P.O. Box 673  
Banjul, The Gambia  
T + 220 441 05 05; 441 05 06  
F + 220 441 05 04  
[au-banjul@africa-union.org](mailto:au-banjul@africa-union.org)

## Managing Expectations

Be aware a complaint with the African Commission can take between four to eight years to process. Filing a complaint can help you to raise awareness of the human rights violations you have suffered among people in your country, in your region, and throughout the world. The Commission's recommendations will put pressure on your government to improve the situation. In the long term, filing a complaint can also help to ensure that future violations do not happen, such as through the creation of new laws and improved access to the African Court for people who have been harmed.

# Additional Advocacy Strategies

It is important to use other forms of advocacy both before and after filing a complaint to increase pressure on the companies, banks, and governments to do the right thing. Once you file a complaint, it is a good idea to write to the company's shareholders, lenders and buyers, and suppliers to let them know about your complaint. You can also write to the senior management and/or board of directors of the development bank, as well as public officials in your country. In your letters, you can ask these people to use their leverage with the company to pressure it to work in good faith to address your community's concerns.

Media advocacy when you file a complaint or when your complaint is accepted by an accountability mechanism can also help increase pressure on the company and the development bank.

Filing a complaint can be a good way to address harm, but it is not the only way. Other things that communities can do include filing lawsuits, especially when a project is causing serious human rights violations. Some communities use shareholder action as a tool to address harm. To do shareholder action, community members pool their money and buy some shares in the company that is causing them harm. As official shareholders, they now have the right to attend the company's shareholder meetings and make their voices heard. Public campaigns and protests can also help to raise public awareness of the issue you are facing. Communities often use several of these strategies at the same time.

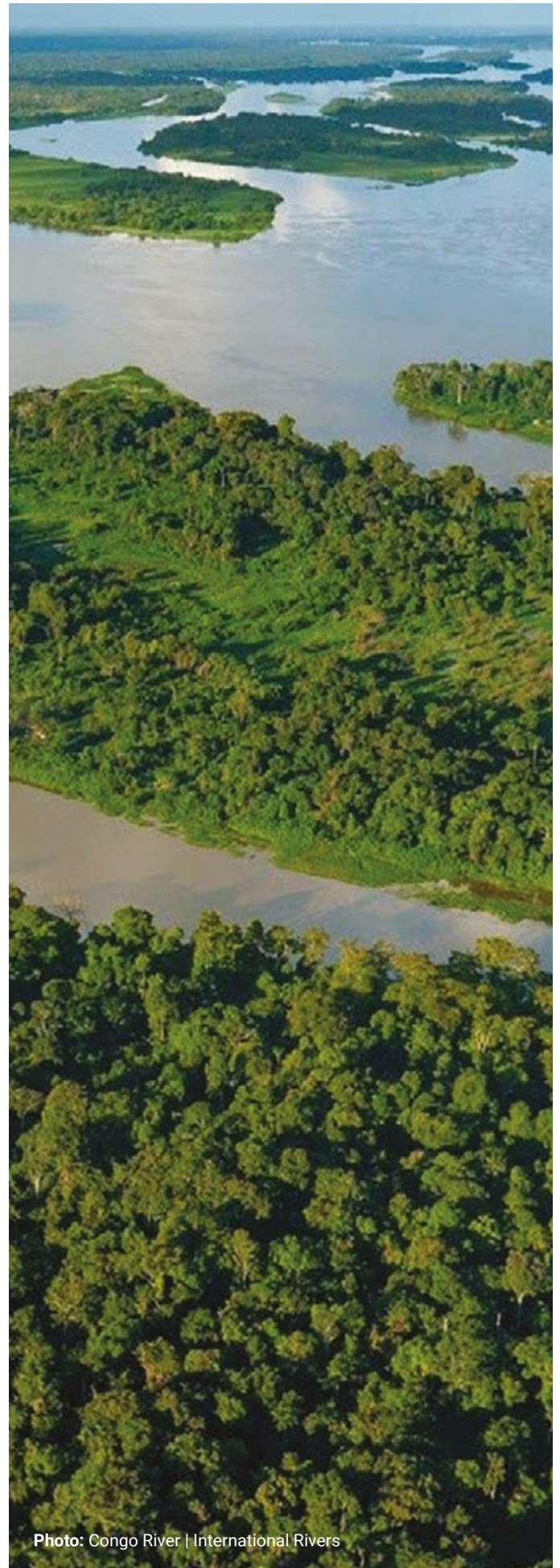


Photo: Congo River | International Rivers

# Resources

## Organizations to contact for help in filing a complaint:

### International Rivers

International Rivers works with river-dependent and dam-affected communities to ensure their voices are heard and their rights are respected.

International Rivers  
344 20th Street, Oakland, 94612  
United States of America  
Tel: +1 (510) 848-1155  
Email: [contact@internationalrivers.org](mailto:contact@internationalrivers.org)  
Website: <https://www.internationalrivers.org>

### Accountability Counsel

Accountability Counsel is a non-profit legal organization that supports communities to defend their environmental and human rights when they have been harmed by internationally financed development projects. Accountability Counsel helps communities to voice their complaints about projects that affect them- and to demand remedies where rights are violated- through the use of non-judicial accountability offices.

Accountability Counsel  
8 California Street, Suite 650 San Francisco, CA 94111  
United States of America  
Tel: + 1 415 296 6761  
Email: [info@accountabilitycounsel.org](mailto:info@accountabilitycounsel.org)  
Website: [www.accountabilitycounsel.org](http://www.accountabilitycounsel.org)

### International Accountability Project

International Accountability Project (IAP) is an international human and environmental rights organization that works with communities, civil society and social movements to change how today's development is done.

Website: <https://accountabilityproject.org>

### SOMO

SOMO's mission is to support and strengthen civil society movements in defending human rights and promoting public interests.

SOMO  
Stichting Onderzoek Multinationale Ondernemingen  
Centre for Research on Multinational Corporations  
Sarphatistraat 30  
1018 GL Amsterdam  
The Netherlands  
Tel: + 31 (0)20 639 12 91  
Email: [info@somo.nl](mailto:info@somo.nl)  
Website: [www.somo.nl](http://www.somo.nl)

### Bank Information Center (BIC)

Bank Information Center (BIC) promotes social, ecological and economic justice by amplifying local voices and democratizing development. In partnership with international, regional, and local CSOs, BIC conducts research and advocacy aimed at reforming and improving international financial institution policy and practices. BIC provides advocacy support, outreach and trainings, and can help to locate hard-to-obtain documents.

Bank Information Center  
1023 15th St NW, 10th Floor  
Washington, DC 20005  
United States of America  
Tel: +1 (202) 737-7752  
Email: [info@bankinformationcenter.org](mailto:info@bankinformationcenter.org)  
Website: [www.bankinformationcenter.org](http://www.bankinformationcenter.org)

### OECD Watch

OECD Watch is a civil society network that aims to ensure that business activity contributes to sustainable development and poverty eradication and that corporations are held accountable for their impacts around the globe. OECD Watch can hold trainings for people who are considering filing complaints, and provide detailed advice on the complaint process.

OECD Watch  
Sarphatistraat 30  
1018 GL Amsterdam  
The Netherlands  
Tel: +31 20 6391291  
Email: [info@oecdwatch.org](mailto:info@oecdwatch.org)  
Website: [www.oecdwatch.org](http://www.oecdwatch.org)

### The Center for International Environmental Law

The Center for International Environmental Law (CIEL) uses the power of law to protect the environment, promote human rights, and ensure a just and sustainable society. CIEL explores and develops new legal tools to counterbalance the power of multinational corporations and increase transboundary corporate accountability.

CIEL (Headquarters)  
1101 15th St NW, 11th Floor  
Washington DC, 20005  
Phone: (202) 785-8700  
Fax: (202) 785-8701  
E-mail: [info@ciel.org](mailto:info@ciel.org)  
Website: <https://www.ciel.org>

## Natural Justice

Lawyers for Communities and the Environment specializes in human rights and environmental law in Africa in pursuit of both social and environmental justice. As a team of pioneering lawyers and legal experts, we conduct comprehensive research on environmental and human rights law, support indigenous peoples and local communities and their supporting organizations, provide technical advice to governments and intergovernmental organizations, and engage in key international processes.

The main Natural Justice office is in South Africa:  
Mercantile Building, 63 Hout Street  
Cape Town, 8000, South Africa  
Telephone/Fax: +27 21 426 1633  
Email: [info\(at\)naturaljustice.org.za](mailto:info(at)naturaljustice.org.za)  
Website: <https://naturaljustice.org>

## Inclusive Development International

Inclusive Development International works to advance social, economic and environmental justice by supporting communities around the world to defend their rights in the face of harmful corporate projects. Through research, casework and policy advocacy, we hold corporations and development agencies accountable to their human rights and environmental responsibilities and promote a more just and equitable international economic system.

Inclusive Development International  
9 SW Pack Square Suite 301  
Asheville, NC 28801 USA  
Tel. +1 (828) 505-4340  
Email: [info@inclusivedevelopment.net](mailto:info@inclusivedevelopment.net)  
Website: <https://www.inclusivedevelopment.net>

## Additional Resources:

### General Information on International Accountability Mechanisms

Accountability Resource Guide: Tools for Redressing Human Rights & Environmental Abuses in International Finance and Development, Accountability Counsel, 8th Edition, August 2015, [www.accountabilitycounsel.org](http://www.accountabilitycounsel.org);

[www.ciel.org](http://www.ciel.org) Website for the Center for International Environmental Law; has a section on international accountability mechanisms and supports communities to make complaints.

“10 Steps to Filing a Complaint,” Centre for Research on Multinational Enterprises (SOMO), <https://www.somo.nl/hrgm/10-step-guide-filing-complaint>.

“Transparency Charter for International Financial Institutions: Claiming our Right to Know”. Global Transparency Initiative, September 2006. <http://www.free-dominfo.org/wp-content/uploads/GTI-charter.pdf>

“Accountability Console” (an online database of complaints filed at IAMS. Registration is required. Users may request a fee waiver.), Accountability Counsel, <https://accountabilityconsole.com>.

“Tools for Human Rights Defenders” (online resources to guide and support complainants and other human rights defenders), Coalition for Human Rights and Development, <https://rightsindevelopment.org/our-work/hrd>.

“Accountability Resource Guide: Tools for Addressing Environmental and Human Rights Abuses in International Finance and Development,” Accountability Counsel, 2015, <https://www.accountabilitycounsel.org/wp-content/uploads/2017/08/ARG-V8.pdf>.

“Early Warning System” (an online tool that provides information and project documents on development projects around the world), Center for International Environmental Law, Coalition for Human Rights in Development, and the International Accountability Project, <https://ews.rightsindevelopment.org>.

“Follow the Money to Justice” (an online tool to help communities identify which financial institutions are supporting development projects), Inclusive Development International, <https://www.followingthemoney.org>.

## Personal Security for Human Rights Defenders

Detailed information and guidance on assessing risk and creating a security plan can be found in this publication by Front Line Defenders: <https://www.frontlinedefenders.org/en/workbook-security>

For information and tips about digital security for human rights defenders, see Security in a Box: <https://www.comminit.com/content/security-box-tools-and-tactics-your-digital-security>

## Free and Prior Informed Consent

Rights in Action: Free, Prior and Informed Consent (FPIC) for Indigenous Peoples by Asia Indigenous Peoples Pact: <https://www.iwgia.org/en/resources/publications/305-books/3129-rights-in-action-free-prior-and-informed-consent-fpic-for-indigenous-peoples.html>

Training Manual for Indigenous Peoples on Free, Prior and Informed Consent (FPIC) by Asia Indigenous Peoples Pact: <https://aippnet.org/training-manual-for-indigenous-peoples-on-free-prior-and-informed-consent-fpic/>

Guide to Free, Prior and Informed Consent by Oxfam Australia: <https://www.oxfam.org.au/what-we-do/economic-inequality/mining/free-prior-and-informed-consent/>

## The African Development Bank

The Independent Review Mechanism of the African Development Bank by SOMO and The Accountability Counsel: <https://www.accountabilitycounsel.org/wp-content/uploads/2017/08/2017-SOMO-AC-The-Independent-Review-Mechanism-of-the-AfDB.pdf>

The official webpage of the African Development Bank Independent Review Mechanism <https://www.afdb.org/en/independent-review-mechanism-irm>

## The World Bank

Inspection Panel of the World Bank [https://www.somo.nl/wp-content/uploads/2018/07/HR-GM\\_WorldBank\\_WEB\\_8-10-2013.pdf](https://www.somo.nl/wp-content/uploads/2018/07/HR-GM_WorldBank_WEB_8-10-2013.pdf) SOMO and Accountability Counsel

[www.inspectionpanel.org](http://www.inspectionpanel.org) This is the Inspection Panel's website; among other important information, it includes copies of all of the claims that have been filed in the past, as well as Management's responses and the Panel's reports.

[www.worldbank.org](http://www.worldbank.org) The World Bank's website; has a "search" function. Should contain current versions of Bank policies (for the policies, see, more specifically, <http://wbln0018.worldbank.org/institutional/manuals/opmanual.nsf/textonly>), contact information, and information about specific country and project lending.

[www.bankinformationcenter.org](http://www.bankinformationcenter.org) Website of the Bank Information Center, loaded with important information including documents such as "Toolkits for Activists" that contain information about how to campaign on a World Bank project. The BIC site also has contact information for Executive Directors of the various IFIs.

BIC Toolkit for Activists: <https://bankinformationcenter.org/en-us/update/toolkit-for-activists/>

"Unlocking the World Bank's Access to Information Policy: Your Key to the Vault" Bank Information Center, July 2011 <https://bankinformationcenter.cdn>.

[prismic.io/bankinformationcenter%2F0ea43428-7b36-481e-8b86-97829a41acff\\_access\\_to\\_info.pdf](https://bankinformationcenter%2F0ea43428-7b36-481e-8b86-97829a41acff_access_to_info.pdf)

"Civil Society Guide to the World Bank's Environmental and Social Framework," Bank Information Center, 2019, [https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/b742a4fd-87d0-4315-98befee330d\\_d8b10\\_Civil+Society+Guide+to+the+WB+ESF.pdf](https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/b742a4fd-87d0-4315-98befee330d_d8b10_Civil+Society+Guide+to+the+WB+ESF.pdf).

World Bank Environmental and Social Policies (including links to the Environmental and Social Framework (ESF) and Safeguards): <https://projects.worldbank.org/en/projects-operations/environmental-and-social-policies>.

"Community Guide to the International Finance Corporation," Inclusive Development International, 2017, <https://www.inclusivedevelopment.net/resources/tools/>

IFC Sustainability Framework (with links to its Access to Information Policy, Policy on Environmental and Social Sustainability, and Performance Standards): [https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/policies-standards/sustainability+framework](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/sustainability+framework).

MIGA Environmental and Social Sustainability (with links to its Policy on Environmental and Social Sustainability and Performance Standards), <https://www.miga.org/environmental-social-sustainability>.

The official website of the Compliance Advisor Ombudsman (IFC/MIGA): [www.cao-ombudsman.org](http://www.cao-ombudsman.org).

"The work of the Compliance Advisor Ombudsman" (short films), CAO, 2019: [https://www.youtube.com/channel/UC7EhYN8wfdupAH4\\_-B1ItGw](https://www.youtube.com/channel/UC7EhYN8wfdupAH4_-B1ItGw).

The official website of the Inspection Panel (World Bank): <https://www.inspectionpanel.org>.

"What is the Inspection Panel" (short video), Inspection Panel, 2016, <https://www.youtube.com/watch?v=9dOQW6gccM>.

World Bank Access to Information Policy <https://policies.worldbank.org/sites/ppf3/PPF Documents/Forms/DispPage.aspx?docid=3693>

IFC Access to Information Policy <https://www.ifc.org/wps/wcm/connect/c8a61c48-32c2-49b2-8e46-2ade87f774e0/IFCPolicyDisclosureInformation.pdf?MOD=AJPERES>

MIGA Access to Information Policy <https://www.miga.org/report/access-information-policy>

## Chinese Investment

Community Guide to the Asian Infrastructure Investment Bank published by Inclusive Development International: [https://www.inclusivedevelopment.net/wp-content/uploads/2020/05/wzw-community-guide-to-the-aiib-participants\\_compressed.pdf](https://www.inclusivedevelopment.net/wp-content/uploads/2020/05/wzw-community-guide-to-the-aiib-participants_compressed.pdf)

The AIIB's Environmental and Social Framework: <https://www.aiib.org/en/policies-strategies/framework-agreements/environmental-social-framework.html>

The AIIB's Policy on the Project-affected People's Mechanism (PPM): <https://www.aiib.org/en/policies-strategies/operational-policies/policy-on-the-project-affected-mechanism.html>

Chinese Loans to Africa Database: Interactive data project by the China Africa Research Initiative at Johns Hopkins University. Contains details of Chinese lending to Africa covering 2000 to 2019. <https://www.bu.edu/gdp/chinese-loans-to-africa-database/>

The People's Map of Global China: A platform providing profiles on Chinese projects around the world and country profiles documenting China's diplomatic and economic relationships with various countries. <https://thepeoplesmap.net>

Business and Human Rights Resource Centre: Their company index archives articles and reports related to over 20,000 global companies, including many Chinese companies. This includes company track records of responding to civil society and community correspondence. <https://www.business-humanrights.org/en/companies/>

BankTrack: The Dodgy Deal database documents profiles of projects or companies financed by commercial banks that have been identified as damaging to the environment or society. This includes Chinese commercial banks. [https://www.banktrack.org/dodgy\\_deals\\_map](https://www.banktrack.org/dodgy_deals_map)

Boston University Global Development Policy Center: Databases on China's Global Development Finance <https://www.bu.edu/gdp/chinas-overseas-development-finance/> and China's Global Energy Finance: <https://www.bu.edu/cgef/#/intro> includes details of hundreds of bank loans.

AidData: Searchable online database of overseas Chinese overseas projects, and datasets document thousands of development projects and hundreds of Chinese loan contracts <https://china.aiddata.org>

Inclusive Development International: A compilation of Chinese standards draws together policies

and guidelines relevant to overseas investment and finance issued by state institutions, industry associations, companies and banks: <https://www.followingthemoney.org/compilation-of-chinese-standards/>

## The African Commission on Human and Peoples' Rights

The African Commission on Human and Peoples' Rights Information Sheet No. 2: Guidelines for Submission of Communications, Organization of African Unity. [https://www.achpr.org/public/Document/file/English/achpr\\_infosheet\\_communications\\_eng.pdf](https://www.achpr.org/public/Document/file/English/achpr_infosheet_communications_eng.pdf)

The African Commission on Human and Peoples' Rights brochure <https://www.somo.nl/wp-content/uploads/2018/07/ACHPR-brochure-final.pdf> by SOMO and Accountability Counsel



Photo: Himba woman | Shutterstock

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344 20th Street

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USA

Tel: +1 510 848 1155

[www.internationalrivers.org](http://www.internationalrivers.org)

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377 Rivonia Boulevard

Rivonia Johannesburg 2128

South Africa

Tel: +27 12 430 2029

