

November 19, 2021

Dr. Akinwumi Adesina, President
The African Development Bank
Avenue Joseph Anoma
01 BP 1387 Abidjan 01
Côte d'Ivoire

Dear Dr. Adesina,

Cc: Jessica Isaacs, Acting U.S. Executive Director

Niels Breyer, Executive Director- Germany, Luxembourg, Portugal and Switzerland

Mmakgoshi Phleta-Lekhethe, Executive Director- South Africa

Chris Chalmers, Chair, Committee on Operations and Development Effectiveness

Zeneb Toure, Civil Society and Community Engagement Division

David Simpson, Director Independent Recourse Mechanism

Re: Stakeholder consultation in the Integrated Safeguard System review

We, the undersigned organizations, are writing to express our support for the AfDB's review of its Integrated Safeguard System (ISS) and to raise some concerns about the review process. We are civil society organizations (CSOs) from across the African continent and international supporters, working to promote accountability in international development finance and advance the interests of communities in the implementation of development projects. We work to monitor the activities, processes and projects of different International Financial Institutions (IFIs), including the African Development Bank (AfDB) to promote inclusion, effective stakeholder engagement, access to information, environmental sustainability, and accountability for improved project performance and outcomes and prevention of harm in our countries.

We [previously wrote in June 2021](#) to Mr. Issa Maman-Sani, Director of the Department of Environmental and Social Safeguards and Compliance, to welcome the ISS review and to share our recommendations for a comprehensive and inclusive consultation process, based on our experiences participating in other MDBs' reviews of their core environmental and social policies (AfDB in 2011-2012; World Bank in 2012-2016; EBRD in 2018; IDB Invest in 2019; IDB in 2020; ADB in 2021; EIB Group in 2021). The ISS review presents an opportunity for the AfDB to upgrade its policies and practices to align with the highest international standards and reflect the goals of the AfDB as well as the needs and rights of the people, communities and regional member countries with whom it collaborates. To achieve this aim, hearing from civil society stakeholders and communities, who are the ultimate beneficiaries and stakeholders of development, is essential.

Following Mr. Maman-Sani's response to our letter on June 21 affirming that the AfDB will launch a consultation process "in the near future" with civil society and other stakeholders as part of the review, no public information about the review has been posted on the AfDB's website, and we have not received any further details about the AfDB's proposed consultation process with external stakeholders.

Given the many critical issues at stake in the upcoming review, it is essential that the review proceeds in an **appropriate timeframe** that recognizes the urgent need to strengthen and expand

the AfDB's safeguard system, yet also provides for **systematic and meaningful consultation** with civil society, communities directly impacted by AfDB-financed development projects, marginalized groups, and the full range of stakeholders and rights holders who have an interest in the ISS review. The AfDB's recent review of the Independent Review Mechanism is an example of a recent AfDB policy review process that was inclusive of stakeholder views and provided space for active and informed participation, and we see that many elements of this process could be emulated for the ISS review. **We are concerned that the coming months between November and January are particularly busy for civil society in the region with end of year commitments and holidays**, and that if a consultation process is launched before the end of the year, it must take into consideration these limitations and build additional time into the process for public review and engagement.

We ask that you use your role as AfDB President to prioritize a comprehensive, inclusive consultation process as part of this critical review process. Reiterating a summary of the recommendations we shared in our June 2021 letter, we urge the AfDB to:

- Immediately disclose on the AfDB website information, in official languages of member countries, about the review scope and timelines as well as a consultation and communication plan detailing steps and a calendar for consultations, concrete dates, and desired outcomes. The Bank should take into consideration that in the last quarter of the year, CSOs are winding up in preparation for the holidays therefore the first consultation process should extend to include the first quarter of 2022 at minimum.
- Conduct a three-phase public consultation process;
 - In the first phase, we encourage the AfDB to organize a first round of consultations with external stakeholders prior to developing a first draft.
 - In the second phase, we recommend the disclosure of the first draft followed by a second round of external consultations involving virtual meetings (and in-person meetings where possible and in observance of applicable COVID-19 restrictions). Stakeholders and rights holders must be given a minimum period of 120 days to offer comments in written and other formats in accordance with best practices adopted by other International Financial Institutions.
 - The third and final phase should consist of engaging online and in person where possible on the second draft. For this phase, we recommend a period of 45 days to offer comments in written and other formats.
- Publicly disclose invitations to participate in consultations through the Bank's website and several media platforms at the local levels 30 days in advance and promote inclusion, diversity, and accessibility. Provide translations of drafts in relevant languages including in Arabic, English, French, and other African Union languages, and in accessible formats so that all interested stakeholders can prepare accordingly and meaningfully engage in the process. We urge the Bank not to restrict invitations to a limited number of hand chosen stakeholders but rather to extend the invitation broadly and to conduct additional outreach to communities affected by AfDB activities and their partners.
- Provide platforms for ongoing communication with stakeholders and opportunities to provide feedback during and after the consultations. These include virtual meetings, in-person meetings where possible, and a dedicated website for the ISS review with the capability to solicit feedback and input.
- Provide within the scope of the review opportunities for discussions around implementation, resourcing, and training on ISS policy.

- Disclose full consultation reports of all comments received with translated versions outlining which comments were adopted, which ones were not adopted, and why.
- Publish the final draft to be submitted to the Board for approval and provide translated versions of the same in official languages of countries of operation.

Finally, as an immediate step, **we would like to request a meeting with you and the Environmental and Social Safeguards and Compliance Department**, to further discuss the above and other issues regarding the ISS review at your earliest convenience.

We trust that the external stakeholder consultation process will adhere to the principles of openness, access to information, transparency, accountability, visibility, and accessibility.

We look forward to further engaging with the President, the Department of Environmental & Social Safeguard and Compliance, and the AfDB at large towards an effective and inclusive ISS review process. We thank you for considering our recommendations. For further information or questions, please contact:

- Aly Sagne, Lumiere Synergie pour le Développement (a.sagne@lsdsenegal.org)
- Phiona Nampungu, Bank Information Center (pnampungu@bankinformationcenter.org)
- Tity Agbahey, Coalition for human rights in development (tagbahey@rightsindevelopment.org)
- Ouafa Haddioui, Arab Watch Coalition (ouafa@arabwatchcoalition.org)