

June 18, 2021

Department of Environmental & Social Safeguards and Compliance  
African Development Bank (AfDB)  
Avenue Joseph Anoma  
01 BP 1387 Abidjan 01  
Côte d'Ivoire

**To: Issa Maman-Sani, Director, Department of Environmental & Social Safeguards and Compliance**

**Cc: Dr Akinwumi Adesina, President of the African Development Bank  
Jessica Isaacs, Acting U.S. Executive Director  
Niels Breyer, Executive Director - Germany, Luxembourg, Portugal and Switzerland  
Mmakgoshi Phlela-Lekhethe, Executive Director - South Africa  
Chris Chalmers, Chair, Committee on Operations and Development Effectiveness**

Re: External Stakeholder Participation in the Integrated Safeguards System Review Process

Dear Mr. Issa Maman-Sani:

We, the undersigned, are writing in relation to the ongoing review of the AfDB's Integrated Safeguards System (ISS). We are civil society organizations (CSOs) that work to promote accountability in international development finance and advance the interests of communities in the implementation of development projects. We monitor the activities, processes and projects of different International Financial Institutions, including the African Development Bank (AfDB) to promote inclusion, effective stakeholder engagement, consultations and participation for improved project performance and outcomes and prevention of harm in our countries.

We welcome the ISS review as recommended by the 2019 [IDEV Report](#), particularly in relation to strengthening safeguards and their implementation. We recognize that the ISS seeks to present a framework that helps to identify risks associated with funded projects and promote sustainable project outcomes while protecting the environment and people from potentially adverse impacts of AfDB-financed projects, within the scope of the institution's stated strategy for socially inclusive and environmentally sustainable growth. 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 countries with whom it collaborates.

In 2019, the AfDB organized a [third review](#) of its Independent Review Mechanism (IRM) and the external consultation process offers a model, which we urge the AfDB to adopt as their minimum standard for all reviews, because it provided several opportunities for interested stakeholders to engage and contribute to the review. For the ISS review, we encourage the AfDB to adopt a similarly effective and inclusive process but with improved strategies for soliciting stakeholder inputs. To have a robust, meaningful, transparent and inclusive consultation process -- which engages a wide range of relevant external stakeholders, including communities and rights holders affected by AfDB funded activities, and their CSO partners -- and in keeping with international best practices including those of AfDB's peer institutions in relation to public consultations during reviews ([EBRD in 2018](#); [IDB Invest in 2019](#); [ADB in 2021](#); [EIB Group in 2021](#)), we urge the Bank to:

- **Disclose on the AfDB's website, information 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:** providing a communication plan and regular updates on the review with translations in official languages of member-countries that is critical for all relevant and interested stakeholders to be aware of the exercise, organize themselves and make meaningful contributions to the process;
- **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 peer institutions.
  - The third and final phase consists of engaging stakeholders online and in-person (where possible) on the second draft; for this phase, we recommend that stakeholders and rights holders be given a minimum period of 45 days to offer comments in written and other formats.

This process would provide stakeholders and rights holders ample time and multiple opportunities to dialogue and engage with AfDB on the revised ISS. For each of these processes, we recommend the provision of interpretation and translation in official languages of countries represented for meaningful engagement. Additionally, consultations must take place at the country level in official languages, and we strongly encourage active participation by staff from country offices and safeguard teams in these consultations, rather than external consultants.

- **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:** in order to make the consultation process inclusive and accessible in all AfDB-member countries, provide a minimum of 30 days prior to each consultation phase and provide translations of drafts in several 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. Conduct additional outreach to communities affected by AfDB activities, and their partners, and provide reasonable accommodations to allow anyone interested to participate;
- **Provide platforms for ongoing communication with stakeholders and opportunities to provide feedback during and after the consultations:** this includes organizing virtual meetings (and where possible in-person outreach meetings, following all COVID-19 and health related protocols) across regions with interpretation in official languages of countries of operation, to solicit inputs from CSOs, local communities and/or their representatives and provide feedback on how their input influenced decisions;
- **Provide within the scope of the review, opportunities for discussions around the implementation of the ISS policy;**
- **Disclose a full consultation report 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.

**As an immediate next step, we would like to request a meeting with you 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.

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

- Aly Sagne, Lumière Synergie pour le Développement ([a.sagne@lsdsenegal.org](mailto:a.sagne@lsdsenegal.org)), or
- Dahmata Koffi, Bank Information Center ([dkoffi@bankinformationcenter.org](mailto:dkoffi@bankinformationcenter.org))

Sincerely,

**The undersigned organizations**

***Burkina Faso***

Association Burkinabè pour la Survie de l'Enfance (ABSE)

Association D'Assistance Pour les Maladies Infectieuses

Association des Bâisseurs de Demain

Association des jeunes pour la promotion des orphelins

BEOG NEERE

Centre d'Information, de Conseils et de Documentation sur le Sida et la Tuberculose (CICDoc)

Démocratie Sanitaire et Implication Citoyenne

***Cameroon***

Réseau Camerounais des organisations des droits de l'homme (RECODH)

***Côte d'Ivoire***

Groupe de Recherche et de Plaidoyer sur les Industries Extractives (GRPIE)

***Democratic Republic of the Congo (DRC)***

Action Paysanne Contre la Faim

African Resources Watch

Conseil Régional des Organisations Non Gouvernementales de Développement

***Gambia, The***

Initiative for the Promotion of Democracy and Good Governance (IPDG)

Open Society Platform Gambia

***Germany***

Urgewald e.V.

***Ghana***

AbibiNsroma Foundation

***Global***

International Accountability Project

***Guinea***

Action Mines

Association de Coopération et de Recherche pour le Développement  
Centre du Commerce International pour le Développement (CECIDE)  
Centre d'Excellence du Droit de l'Environnement-CEDE  
Le Monde Des Enfants (MDE)  
Réseau National de la Société Civile pour l'Environnement et le Développement Durable

***Kenya***

Jamaa Resource Initiatives

***Lesotho***

Lesotho National Federation of Organisations of the Disabled

***Liberia***

Alliance for Rural Democracy  
Green Advocates International  
Mano River Union Civil Society Natural Resources rights and Governance platform  
Natural Resources Women Platform

***Malawi***

Centre for Human Rights and Rehabilitation  
Centre for Social Accountability & Transparency

***Mongolia***

Oyu Tolgoi Watch

***Netherlands***

Both Ends

***Nigeria***

African Law Foundation (AFRILAW)  
Africa Network for Environment and Economic Justice (ANEEJ)  
Community Outreach for Development and Welfare Advocacy (CODWA)  
Foundation for Environmental Rights, Advocacy & Development (FENRAD)  
Foundation for the Conservation of the Earth  
Peace Point Development Foundation (PPDF)

***Regional***

Arab Watch Coalition

Article 19

***Senegal***

Lumière Synergie pour le Développement (LSD)

***Sierra Leone***

Network Movement for Justice and Development (NMJD)

***Tanzania***

SUHODE Foundation

Mazingira Network (MANET)

***Uganda***

Buliisa Initiative for Rural Development Organisation (BIRUDO)

Friends with Environment in Development

Joy for Children Uganda

Uganda Consortium on Corporate Accountability

Witness Radio

***United States of America***

Accountability Counsel

Bank Information Center

Center for International Environmental Law (CIEL)

Corporate Accountability Lab

Green Advocates USA

Inclusive Development International

International Rivers

Mighty Earth