

BIC's Proposed KPIs: Has IFC/MIGA's Interim RAF Delivered Remedy in Practice? February 2026

The following key performance indicators (KPIs) assess whether the International Finance Corporation (IFC) and the Multilateral Investment Guarantee Agency's (MIGA) Interim Remedial Action Framework (RAF) results in the delivery of remedy for communities harmed by IFC/MIGA investments through concrete, durable changes to project practices and risk mitigation measures, rather than process and perceptions.

1. Have IFC/MIGA and the client addressed harm through concrete changes?

- a. Cessation or modification of harmful practices: Remedy requires addressing the source of harm. Measuring whether harmful practices change is essential to determining whether the RAF results in meaningful on-the-ground outcomes.
 - i. Measure: Has the specific practice, activity, or condition that caused project-related harm been modified, replaced, or terminated following the application of the RAF?
- b. Time from identification of harm to the delivery of remedy: Delayed remedy undermines the RAF's effectiveness and has been a recurring issue for IFC/MIGA projects and CAO complaints.
 - i. Measure: What is the elapsed time between identification of harm and/or filing of a CAO complaint and completion of remedial actions that result in tangible change?

2. Have IFC/MIGA and the client delivered remedy?

- a. Implementation of remedial actions: Access to remedy requires delivery of concrete remedial actions, not only facilitation, planning, or capacity building.
 - i. Measure: Were remedial actions and/or a Management Action Plan (MAP) implemented?
- b. Restoration or replacement of lost access, benefits, or protections: Many IFC/MIGA-supported projects cause harm by reducing access to livelihood, social services, or other benefits. In these cases, remedy must therefore be assessed in terms of restored rights, benefits, or protections.
 - i. Measure: Has access to livelihood, which may require access to land, employment, social services, education, healthcare, or other benefits diminished by project-related harm been restored or replaced through remedial action?
- c. Alignment between harm and remedial action: For remedy to be effective, remedial actions should directly address the identified harm.

- i. Measure: What is the degree to which remedial actions and/or the MAP directly address the specific harm identified, rather than substituting unrelated, generic, or institutional-level activities?

3. Have remedial measures remained durable and prevented repetition of harm?

- a. Persistence of remedial measures over time: Remedy that is temporary or easily reversed does not deliver true accountability for project-affected communities.
 - i. Measure: Have remedial measures remained in effect after the end of the project and/or MAP implementation period, including continued use of revised practices, policies, or safeguards by the client and IFC/MIGA?
- b. Recurrence of the same harm: Recurrence indicates that remedial action failed to address root causes and reflects gaps in IFC/MIGA's supervision and use of leverage.
 - i. Measure: Has the same type of harm occurred again after remedial actions were implemented?

4. Has there been client behavior change and institutional learning at IFC/MIGA?

- a. Integration of remedial measures into contractual agreements: To prevent future harm, IFC/MIGA and clients must show a willingness to make structural changes. Integrating remedy and prevention measures into client contracts demonstrates that remedial action is not ad hoc or discretionary.
 - i. Measure: Have remedial actions been incorporated into IFC/MIGA's contractual agreements with clients? By integrating remedial measures into contractual agreements, have there been changes in client's policies, procedures, or operations?
- b. Changes in risk identification and management following harm and the delivery of remedy: Many harms arise from systemic failures in environmental and social (E&S) risk management. Measuring changes after the application of the RAF tests whether lessons were internalized.
 - i. Measure: After the application of the RAF, to what extent have IFC/MIGA and clients improved how they identify, prevent, manage, and respond to E&S risks?

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