

Technical Analysis and Recommendations on the Zero Draft of the PPPI Framework — Conexión Sur Program (IDB)

Prepared by members of the IDB Working Group as part of the open public consultation on the zero draft of the Conexión Sur Program's PPPI Framework

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General Comments

The Zero Draft of the PPPI Framework — Conexión Sur Program (hereinafter, the draft) is well written and formally consistent with ESPS 10, but it operates almost entirely at the level of stated intent. In professional terms, it is a declaration of principles rather than a stakeholder engagement plan: virtually none of its statements identifies a responsible party, deadline, budget, or associated indicator. Almost nothing it announces can be subsequently verified or monitored.

For example, all of the structured participation guaranteed by the document for an eleven-country, five-year program consists of four Participation Committees, one virtual dialogue with each committee lasting between one and three hours, and one joint dialogue planned for 2027. Everything else is qualified by the phrases “as needed,” “when appropriate,” and “as applicable.”

1. Cross-cutting proposal: explain how the Program will operate at each level of the spectrum

The IAP2 Public Participation Spectrum¹ organizes participation into five levels and assigns a specific promise to the public at each level. It is the most widely used tool for a program to explain unambiguously what type of participation it offers for each type of decision.

The draft does not identify levels within the spectrum, and this is the root of much of the document's imprecision: it uses ambitious language—co-design, joint development, influencing the Program—without specifying the mechanisms and forums that would make this possible. Clarifying this would allow stakeholders to know what they can expect and enable the Program to account for what it has offered. We therefore recommend that the PPPI Framework include a section explaining how the Program will operate at each level of the spectrum and specifying, for each level, the content set out below.

Level	Promise to the public (IAP2)	What should the Conexión Sur PPPI Framework specify?
Inform	"We will keep you informed."	What information will be proactively disclosed, how often and through which channels, and what is meant by “relevant, understandable, and accessible” information at the Program level.

¹ Source: Adapted from the [IAP2 Public Participation Spectrum](#).

Level	Promise to the public (IAP2)	What should the Conexión Sur PPPI Framework specify?
Consult	"We will keep you informed, listen to and acknowledge your concerns and aspirations, and let you know how your input influenced the decision."	Which decisions will be subject to consultation—selection and prioritization criteria, the scope of the portfolio, and reviews of the PPPI itself—at what stage of the cycle, how far in advance documentation will be provided, and within what timeframe the Program will report back on how input was considered.
Involve	"We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed, and we will give you feedback on how your input influenced the decision."	At which stages stakeholders will participate in formulating alternatives at the Program level—infrastructure types, modes of transport, exclusions, and social and environmental prioritization criteria—and how the Program will document that their concerns were reflected in those alternatives.
Collaborate	"We will turn to you for advice and innovation to formulate solutions, and we will incorporate your advice and recommendations into the decisions to the greatest extent possible."	Which matters will be addressed jointly with the Participation Committees—for example, the design of the participatory process itself or the Program's social and environmental criteria—and through what mechanism their recommendations will be incorporated and reported on.
Empower	"We will implement whatever you decide."	Whether the Program provides for any area of delegated decision-making—for example, the working methods and agenda of each Participation Committee—and under what conditions.

2. Objectives of the PPPI Framework

The draft states an overall purpose —“to establish a structured, transparent and inclusive approach to stakeholder engagement at the Program level”— and then describes some accompanying elements: early and continuous engagement, timely and accessible disclosure, adequate grievance mechanisms and attention to Indigenous Peoples, Afro-descendant and traditional communities, women and other disadvantaged groups.

The purpose is appropriate, but it is not accompanied by specific objectives. The document does not establish what results participation at the Program level is expected to produce, within what timeframes, or how achievement will be assessed. The same shortcoming appears in the Participation Committees, whose objectives are expressed in conditional language—“may generate perspectives and recommendations,” “may help identify potential concerns.” In other words, they describe what might eventually happen rather than what the Program intends to achieve.

Specific objectives are precisely what will give the Program's PPPI traction: they constitute the public commitment against which the Bank, stakeholders, and the Board of Executive Directors of the IDB Group will later be able to assess what has been done.

SPECIFIC RECOMMENDATIONS

- Incorporate specific objectives of the PPPI Framework, differentiated from the general purpose, with expected results and time horizon.
- Associate each objective with at least one verifiable indicator and one instance of public reporting.
- Reformulate the objectives of the Participation Committees in affirmative terms—stating what each committee intends to achieve—rather than in conditional terms.
- Make explicit the relationship between the objectives of the PPPI Framework and the participation plans of each project, specifying what the latter are expected to inherit from the Program level.
- Explain the benefits of substantive participation—better outcomes and a better distribution of benefits, optimized designs and lower long-term costs, and greater Program sustainability—so that the objectives rest on an explicit rationale rather than merely on compliance with a requirement.

3. Guiding Principles of the PPPI Framework

The draft sets out five principles: inclusive, respectful, and non-discriminatory; early and adaptive; clear and accessible; transparent and regular; and well documented and followed up. The selection is reasonable, and none of the principles is objectionable in itself. The problem lies in what is missing and is not being considered.

Absence of the central principle of public participation

The second IAP2 core value for public participation states that participation “includes the promise that the public's contribution will influence the decision.” The draft states that stakeholders “can help define issues, contribute to decision-making, and influence the Program,” but presents this as a possibility rather than an institutional commitment. Article 7.4 of the Escazú Agreement, by contrast, is binding: participation must be possible from the early stages “so that the observations of the public are duly considered and contribute to such processes.”

Protection for human rights defenders, but without a protocol

The commitment to non-retaliation appears as a single sentence within the first principle. Article 9.1 of the Escazú Agreement requires States to guarantee “a safe and enabling environment in which persons, groups and organizations that promote and defend human rights in environmental matters are able to act free from threat, restriction and insecurity,” while Article 9.2 requires “appropriate and effective measures.” Although more tools are available at the project level to ensure safe participation, it is unclear how defenders will be protected at the Program level. A declaratory clause without a procedure does not meet that standard, especially in a corridor program operating in contexts affected by illegal economies.

SPECIFIC RECOMMENDATIONS

- Incorporate a principle of participation with influence that expressly adopts, as a minimum, the promise of the IAP2 spectrum's "consult" level: report back to stakeholders on how their input influenced the decision.
- Explain, in line with the proposal in section 1, how the Program will operate at each level of the IAP2 spectrum, assigning a level to each type of decision (prioritization criteria, project selection, PPPI review, and monitoring).
- Incorporate a principle of proportionality: the intensity of participation should scale according to the magnitude of the impact and the irreversible nature of the decision.
- Highlight the importance of communities and of human rights and environmental defenders, and reiterate and reinforce the IDB's commitment to zero tolerance for reprisals, marginalization, and manipulation under the Program's PPPI. Pay close attention to and [analyze](#) civic-space restrictions in different countries so as to tailor measures and procedures that guarantee the right to full participation and align with the protection of rights-holding people and communities.

4. Methodology and timeline

This is the most technical and the most noticeable gap, because there are several widely accepted standards or best practices that the draft simply does not conform to.

There is no stakeholder engagement matrix

Early and continuous engagement and meaningful consultation, proportionate to risks and impacts on affected communities, require identifying affected parties, other stakeholders, and disadvantaged or marginalized groups that may need specific measures or assistance. The standard instrument for this purpose is a matrix that cross-references stakeholder group, method, stage of the cycle, frequency, responsible party, and treatment of feedback. The draft instead offers a narrative timeline. Without such a matrix, there is no way to verify progress in engagement.

There are no deadlines or minimum standards for the methods

The methods are named—information disclosure, dialogues, and structured forums—but the draft does not minimally define at what stage they will be convened, how far in advance notice will be given, what documentation will be provided and when, who will document the process, or within what timeframe responses will be provided. The document contains no reference to expected minimum deadlines.

The consultation-fatigue argument functions as downward delegation

The draft argues that, to avoid consultation fatigue and duplication, participation at the Program level will focus on strategic issues, while detailed consultations with stakeholders will take place at the project level. This reasoning is sound, but as currently worded, it reverses the logic of early participation: the strategic level is precisely where corridors, alternatives, exclusions, and prioritization criteria are decided—that is, where participation can still make a difference. By the time the discussion reaches the individual project level, the route has already been defined. This was, moreover, the documented failure mode of IIRSA and COSIPLAN.

Feedback is discretionary

The draft states that the results of the participation "are shared as appropriate." Article 7.8 of the Escazú Agreement is explicit in the opposite sense: once the decision is adopted, the public must be informed "of it and

of the reasons and grounds that support it, as well as how their observations were taken into account," and "the decision and its background will be public and accessible."

There is no budget and there are no indicators

The document does not indicate who will finance the travel, interpretation, connectivity, or technical assistance that a community organization needs to analyze technical documentation. Article 7.10 of the Escazú Agreement requires the establishment of "appropriate conditions for public participation in environmental decision-making processes to be adapted to the social, economic, cultural, geographical and gender characteristics of the public." Without funding, in a Program of Amazonian scale, meaningful participation is effectively limited to those who already have the means. The document also lacks indicators for the participatory process and any provision for evaluating it.

Coordination between the Program and project levels remains unresolved

The draft states that each project's stakeholder engagement plan is the responsibility of the borrower and that the Program level "complements and guides, but does not prescribe" those processes. However, it does not specify the minimum content those plans must include, which principles should cascade down from the Framework, or how consistency with the Framework will be verified. As a result, the instrument loses its core function: dozens of project plans without a common baseline, and a framework that does not provide one.

Coordination among programs and across IDB Group windows

The document states that participation will be coordinated with other regional programs, including Amazonía Siempre, "to identify overlaps, ensure consistency, and leverage synergies," but it does not explain through which forums or how frequently. Nor does it specify how stakeholder participation operates across the Group's different windows, even though the Program expressly brings together the IDB, IDB Invest, and IDB Lab.

Conceptual precision of the document

A stakeholder engagement plan whose key terms are undefined cannot be applied consistently. The draft calls what are, in fact, engagement tools "approaches"; it does not include a glossary defining free, informed, meaningful, timely, or continuous participation; and it uses the phrase "continuous and two-way participation" imprecisely for a process characterized by exchange, deliberation, and collective decision-making, rather than a simple flow in two directions.

SPECIFIC RECOMMENDATIONS

- Incorporate as an annex to the PPPI Framework a participation matrix that cross-references, for each group: method, moment of the cycle, minimum frequency, responsible party, expected product and response time.
- Set minimum time limits for prior review of documentation before each participatory stage, and a maximum time limit for written response to the contributions received.
- Revise the passage on consultation fatigue: Program-level participation should focus on project selection and/or prioritization criteria, alternatives, and exclusions, because this is where decisions are still reversible.
- Commit to a public comments-and-responses matrix for each participatory process conducted under the PPPI, in accordance with Article 7.8 of the Escazú Agreement.
- Allocate an explicit budget for participation under the PPPI—travel, interpretation, and connectivity—in accordance with Article 7.10 of the Escazú Agreement.
- Define public indicators for the participatory process (disaggregated participant data, territorial coverage, response times, and the proportion of input incorporated) and evaluate the process at midterm and completion.
- Provide documentation with minutes validated by the participants, and not just summaries prepared by the Bank.
- Establish a greater correlation between project-level participation plans and the PPPI Framework to ensure coherence.
- Adopt active transparency as the standard—publishing all available information except where narrowly defined and duly justified exceptions apply—in line with the IDB and IDB Invest Access to Information Policies, for both Program- and project-level documents.
- Specify the coordination spaces with Amazonía Siempre and other regional programs, and the participation model applicable to the operations of IDB Invest and IDB Lab.
- Include a glossary of key terms, correct the designation of engagement “approaches,” which are actually tools, and revise the phrase “continuous and two-way participation.”
- Add to the contact channels a physical address and a telephone number for assistance, with several access points given the geographical scale of the Program.

5. Identification and analysis of stakeholders

Preliminary mapping and engagement approaches

In Table 1 of the preliminary mapping, the column “Indicative Participation at the Program Level” says exactly the same thing—“Dialogue, input, information exchange”—for all nine stakeholder categories. Indigenous Peoples, Afro-descendant communities, women’s organizations, the private sector, investors, and academia all receive the same form of participation. Furthermore, the distinction the table itself makes between “people affected by the project” and “other stakeholders” has no operational implications.

It is a list, not an analysis

Stakeholder identification and mapping processes also require an analysis of each stakeholder: who is affected by what, the degree of vulnerability, the capacity to influence, and the differentiated measures required as a result. Despite covering eleven countries, the draft does not disaggregate by country, region, or corridor; analyze capacity to influence; or identify hard-to-reach stakeholders and how they will be reached.

The classification has no consequences

As noted, the indicative participation column in Table 1 is identical for all nine categories. If being an affected party changes neither the form nor the intensity of participation, the classification can be considered purely nominal.

Missing categories and absence of open category

Organizations of people with disabilities, LGBTQI+ people, youth, workers and their organizations, migrant and mobile populations—particularly relevant in corridors—and human rights defenders are not included. Nor is a distinction made between Indigenous governments and self-governments and Indigenous Territorial Entities and civil society organizations in general, a distinction that Convention 169 mandates by requiring consultation through the representative institutions of Indigenous peoples. And there is no open category that would allow anyone who expresses interest to participate without demonstrating any qualifications.

Mapping has no procedure and self-identification has no channel

The draft states that stakeholders "will be identified through participatory mapping," using the passive voice, without specifying who is responsible, without a methodology, without a date, without a validation process, without a publication location, and without a schedule for updates. Self-identification is presented as an opportunity but lacks a form, channel, response time, and confidentiality protocol for those who identify themselves in high-risk contexts.

Downstream and cross-border communities disappear

The draft cites the ESPS definition of stakeholder, which expressly includes "downstream and transboundary" communities, and then never mentions them again. In bioceanic corridors and shared river basins, this is the group that has historically been omitted from mapping.

SPECIFIC RECOMMENDATIONS

- Convert the mapping into an analysis with disaggregation by country and by corridor, explicit criteria of vulnerability and capacity to influence, and differentiated measures by group.
- Differentiate the modality and intensity of participation in Table 1 according to the function assigned to each category, so that the distinction between affected parties and other interested parties has an operational consequence.
- Incorporate the missing categories and an open participation category that does not require proof of legal or direct interest or status as an affected person.
- Recognize indigenous governments and self-governments and Indigenous Territorial Entities as a distinct category from civil society organizations, in accordance with ILO Convention 169.
- Define the mapping procedure: responsible party, methodology, schedule, validation instance, publication and updating at least annually, with a public record that respects the confidentiality of the person requesting it.
- Enable a formal self-identification channel with a form, response time, and confidentiality and protection protocol.
- Operationalize the identification of downstream and cross-border communities, which the draft itself incorporates into the definition but does not develop.
- Reorganize the list of stakeholders from general to specific, ensuring visibility and differentiated channels of communication for each group.

6. Participation Committees

This is the weakest section of the draft and, at the same time, the one for which the most relevant comparative model exists: the multi-stakeholder groups of the Infrastructure Transparency Initiative (CoST). CoST works specifically on public infrastructure, brings together government, the private sector, and civil society, and has its own Spanish-language guide for establishing such groups.

Before the rules: what are the Participation Committees for?

The first problem with this section concerns purpose rather than rules. The draft defines the committees as bodies intended to “facilitate dialogue at the Program level” and “offer structured opportunities for broader participation,” but goes no further. It does not state what they produce, which decisions they address, or what happens to their input.

This lack of clarity becomes even more apparent when compared to the discussions at the Brasilia Workshop, where the Bank announced the creation of a multi-sectoral Advisory Panel—comprising civil society, Indigenous Peoples, Afro-descendant communities, the private sector, and academia—designed to guide the implementation of the Program and formulate recommendations, with the possibility of forming thematic working groups. The draft makes no mention of this Panel whatsoever.

An advisory panel and a dialogue forum or participation committee are not the same type of body; the difference is one of nature, not degree. An advisory body has a mandate, a designated recipient required to respond, continuity over time, and its own rules and support; a dialogue forum gathers input on occasions determined by the convener. On the IAP2 spectrum, a panel that guides implementation and whose recommendations are incorporated into decisions falls at the “collaborate” level, whereas the committees as described do not go beyond “consult.”

The specific risk is that the Participation Committees will end up being presented as the institutional response to a demand for an advisory body, without possessing any of its attributes. The PPPI Framework should explicitly resolve this ambiguity: whether the Advisory Panel will be created, at what level—Program or IDB Group—, with what mandate and composition, and whether the committees inform its work, are a separate instrument, or are subsumed within it.

The architecture of participatory governance is not defined

Several bodies coexist or have been announced around Conexión Sur: the Conexión Sur Team within the Vice Presidency for Countries and Regional Integration, the IDB Civil Society Team, the Civil Society Advisory Groups, the Dialogue Committee with Indigenous Peoples and Afro-descendant Peoples under consideration by the Bank, SESCA's stakeholder engagement plan for the Capricorn Bioceanic Corridor, and the IDB–Civil Society Action Plan under development. The draft mentions only some of them and does not explain how they relate to one another or to the committees.

This is compounded by a structural omission: Conexión Sur brings together the public- and private-sector arms of the IDB Group—the Bank itself, IDB Invest, and IDB Lab—each of which has different disclosure and engagement frameworks, yet the draft does not specify how stakeholder participation operates in each window.

Compared with relevant standards, the four proposed Participation Committees also have the following shortcomings.

They have no terms of reference or internal rules

The words “rules” and “quorum” do not appear in the document. The committees' objectives are expressed in conditional language—“may generate perspectives and recommendations,” “may help identify”—and there are no operating rules governing their composition, term length, member-approval procedure, or mode of operation.

It is not clear who serves on them or how members are selected

The IDB convenes the committees and defines the four thematic groupings, but the draft does not establish how many people serve on them, whom they represent, or how they are appointed. The provision recognizing that committees organize their own dynamics and methodology is a step forward, but it is insufficient without an appointment procedure for each constituency and publication of the membership.

There is no channel for influence

Nothing in the text indicates to which body a committee's recommendations are submitted, who is obligated to respond to them, within what timeframe, or what is published. Without this process, committees become advisory bodies without a defined recipient, and the promise of the “collaborate” level of the IAP2 spectrum—incorporating advice and recommendations into decisions to the greatest extent possible—is rendered meaningless.

Frequency and resources

The firm commitment consists of one virtual dialogue lasting between one and three hours per committee, one joint dialogue in 2027, and additional dialogues “as needed” at milestones the document does not define. No secretariat, budget, or joint facilitation is envisaged: the Bank convenes the meetings, sets the agenda, documents, synthesizes, and reports on a process for which it also drafts the record of agreements.

The structure fragments rights-holding groups

Separating Indigenous Peoples and Afro-descendant and traditional communities into their own committees, apart from the committee on infrastructure, connectivity, logistics, energy, and digital development, means that the sectoral discussion—where corridors and projects are actually shaped—takes place without rights holders at the table. The single joint dialogue planned for 2027 does not correct this imbalance. Good practice calls for one body with balanced constituencies or, if thematic committees are used, guaranteed cross-cutting seats.

SPECIFIC RECOMMENDATIONS

- Approve and publish terms of reference for each committee, including role, rights, responsibilities, term of office, and internal operating rules.
- Recognize the right of each constituency to appoint its own representatives, and publish the membership of each committee.
- Establish operating rules: a regular minimum meeting frequency, quorum, decision-making rules, a jointly developed agenda, and public minutes.
- Define the channel for influence: the body to which each recommendation is submitted, the deadline for the Bank's written response, and the obligation to publish that response.
- Provide for a secretariat, a participation budget, and either co-chairing or independent facilitation.
- Guarantee cross-cutting seats for Indigenous Peoples and Afro-descendant and traditional communities on the infrastructure and connectivity committee, and not only on their specific committees.
- Link the committees to the Program cycle: mandatory consultation before the selection and prioritization of projects, with the key milestones defined in the document itself.
- Adopt a protocol for safe participation and non-retaliation for members of committees, in accordance with Article 9 of Escazú.
- Define the mandate of each committee beyond facilitating dialogue: what outputs it produces, which decisions it addresses, and what obligation it creates for the Bank to respond.
- Clarify the relationship between the committees and the Advisory Panel announced at the Brasilia Workshop: whether the Panel will be created, at what level, with what mandate and composition, and whether the committees feed into its work or constitute a separate instrument.
- Incorporate a governance model that establishes the rules and procedures for interaction between the committees, the Conexión Sur Group, the IDB Civil Society Group, the Civil Society Advisory Groups, and the IDB-Civil Society Action Plan under development.
- Specify the relationship of the committees with the Dialogue Committee with Indigenous and Afro-descendant Peoples that the Bank is considering, and with the SESCA's own participation plan for the Capricorn Bioceanic Corridor.
- Explain how stakeholder participation operates in the operations of IDB Invest and IDB Lab included in the Program.
- Provide for the evaluation of the committee model and a dated review clause.

7. Commitments from the Brasilia Workshop that should be reflected in the PPPI Framework

The Conexión Sur Workshop held in Brasilia on July 1, 2026 resulted in a series of commitments and announcements by the Bank, several of which concern precisely the matters governed by this instrument: an advisory body, project-selection criteria, publication of consulting outputs, and consultation deadlines. None appears in the draft.

Since the PPPI Framework is the document that organizes participation in the Program, it is the natural place to record them. Leaving them as verbal commitments from a workshop makes them dependent on the continued presence of the people who made them, when their value lies precisely in their ability to survive team changes.

Workshop Commitment or Announcement	Named responsible party	What should the PPPI Framework specify?
Distribute the SEP to the people and organizations that participated in the Workshop within thirty days for comment	Eduardo Café and Renata Vargas Amaral (Conexión Sur)	The mechanism for acknowledging receipt and responding to comments received, and the applicable timeframe for that response.
Creation of an expanded Advisory Panel, with civil society, Indigenous Peoples, Afro-descendant communities, the private sector and academia	Renata Vargas Amaral (Conexión Sur) and Tatiana Schor (Civil Society Group)	Whether the Panel will be created; at what level—Program or IDB Group; with what mandate and composition; and how it will relate to the Participation Committees.
Creation of transparent criteria for the selection and prioritization of projects, incorporating social and environmental viability	Renata Vargas Amaral (Conexión Sur) and Daniel Torres (INE)	At what stage of the cycle those criteria will be subject to consultation, where that participation falls on the spectrum, and the date by which the criteria will be adopted.
Support for improvements in sectoral infrastructure planning (upstream planning)	Conexión Sur Team, Civil Society Team, and ESG Team	How that support translates into early participation at the Program level and what resources will sustain it.
Completion of the SESCA for the Capricorn Bioceanic Corridor, which will have its own stakeholder engagement plan	Renata Vargas Amaral (Conexión Sur) and ESG team	How does this participation plan fit in with the PPPI Framework and with the Participation Committees?
Disclosure of SESCA's preparatory documents and final outputs, as well as those of the Program's Technical Cooperation operations	Renata Vargas Amaral (Conexión Sur) and ESG team	Require the PPPI Framework to establish deadlines for publishing those outputs.
Creation of a Dialogue Committee for direct dialogue with Indigenous and Afro-descendant Peoples	IDB Civil Society Group	Its relationship with Participation Committees No. 2 and No. 3, to avoid duplication or competition among the bodies.
Extension of the Program's commitments to IDB Invest operations	IDB Civil Society Team	How stakeholder participation operates in the operations of IDB Invest and IDB Lab within the Program.

8. Consolidated table of gaps and recommendations

Area	Gap detected	Recommendation
Objectives	The document states a general purpose but not specific objectives, expected results, or time horizon.	Incorporate specific objectives with expected results, deadlines, and associated verifiable indicators.
Objectives	The objectives of the Participation Committees are written in potential terms: they describe what could happen, not what the Program intends to achieve.	Reformulate the objectives of the committees in a positive way and associate them with specific products.

Area	Gap detected	Recommendation
Principles	There is no guarantee that the contribution will influence the decision; the influence is described, not promised.	Incorporate a principle of participation with influence that adopts, as a minimum, the promise associated with the “consult” level.
Cross-cutting	The document does not explain which level of participation applies to each type of Program decision.	Incorporate a section that explains how the Program will work according to the levels of the spectrum, assigning a level to each type of decision.
Principles	The principle of non-retaliation is a phrase within a principle, without a protocol. "Defender" does not appear in the document.	Elevate the protection of human rights defenders to an autonomous principle, with a protocol and early warning channel.
Methodology	There is no participation matrix by group, method, time, frequency and responsible party.	Incorporate the matrix as an annex to the PPPI Framework.
Methodology	There are no deadlines	Set minimum deadlines for prior review of documents and a maximum deadline for written response to contributions.
Methodology	There is no budget or resources to participate; no mention of financing participation.	Allocate a budget for travel, interpretation, connectivity, etc.
Methodology	There are no indicators of the participatory process nor an evaluation of it.	Define public indicators and evaluate the process at midterm and completion.
Identification	It is a list of categories, not an analysis: without disaggregation by country or corridor, without vulnerability analysis or capacity to influence.	Convert mapping into analysis, with territorial disaggregation and differentiated measures by group.
Identification	The indicative participation column in Table 1 is identical for all nine categories: the distinction between affected parties and other interested parties has no operational consequence.	Differentiate the form and intensity of participation according to the role assigned to each category in the table.
Identification	Missing categories: organizations of people with disabilities, LGBTQI+ people, youth, workers, mobile populations, human rights defenders, and Indigenous governments and self-governments as a separate category. There is no open category.	Expand the categories, distinguish indigenous governments from civil society organizations, and incorporate an open category.
Identification	The mapping has no responsible party, methodology, date, validation, or update frequency; self-identification has no channel or response time.	Define the mapping procedure, responsible party, and schedule, publish it, update it annually, and enable a formal self-identification channel with a confidentiality protocol.
Committees	There are no terms of reference or internal rules: the words regulation or quorum do not appear in the document.	Approve and publish terms of reference for each committee, including its role, rights, responsibilities, and decision-making rules.

Area	Gap detected	Recommendation
Committees	The IDB convenes and defines the groupings; it is not defined who makes up each committee or how they are chosen.	Recognize the right of each constituency to appoint its representatives and publish each committee's membership.
Committees	There is no channel for influence: nothing indicates where a recommendation is submitted, who responds, or within what timeframe.	Require a written response from the Bank to each recommendation, subject to a deadline and an obligation to publish the response.
Committees	Minimum frequency: one virtual dialogue lasting one to three hours per committee, plus one joint dialogue in 2027.	Establish a regular minimum frequency and link the dialogues to defined milestones in the Program cycle.
Committees	The four-committee architecture separates the rights holders from the sectoral committee where the corridors are shaped.	Ensure cross-cutting seats for Indigenous Peoples and Afro-descendant and traditional communities on the infrastructure and connectivity committee.
Committees	It is not explained what relationship the committees have with the Advisory Panel discussed at the Brasilia Workshop, nor what their mandate is beyond facilitating dialogue.	Define the mandate of the committees and clarify whether the Advisory Panel will be created, with what composition and in what relationship with them.
Committees	The participatory governance architecture is not defined: the document does not explain how the committees relate to the Conexión Sur Team, the IDB Civil Society Team, the ConSOCs, and the IDB–Civil Society Action Plan.	Incorporate a governance model with rules and procedures for interaction between these instances.
Committees	The document does not specify how participation operates in IDB Invest and IDB Lab operations, even though the Program brings together the Group's public- and private-sector arms.	Specify the participation model applicable to each IDB Group window.
Methodology	The minimum content of project-level PPPIs is not established in advance, nor does the document explain how their consistency with the PPPI Framework will be verified.	Cascade the minimum requirements for project-level plans and define the mechanism for verifying their consistency.
Methodology	The active transparency criterion is not adopted, nor are the spaces for coordination with other regional programs specified.	Adopt active transparency as the rule, with limited and justified exceptions, and specify coordination with Amazonía Siempre and other programs.
Methodology	Conceptual imprecision: the "approaches" to participation are actually tools, there is no glossary and the formula "continuous and bidirectional participation" does not accurately describe participation.	Incorporate a glossary of key terms and correct those designations.

Area	Gap detected	Recommendation
Commitments	The commitments and announcements from the Brasilia Workshop are not reflected in the draft, even though they concern matters governed by this instrument.	Incorporate the Workshop commitments into the PPPI Framework, including the responsible party and deadline.

9. Recommendations with the greatest impact

- Develop a stakeholder engagement matrix for stakeholder identification and analysis, with deadlines, responsible parties, and a budget. Its absence is the document's most significant shortcoming, because such a matrix is a core standard for a stakeholder engagement plan and turns a statement of intent into a verifiable plan.
- Define the mandate of the Participation Committees and their relationship with the Advisory Panel announced in Brasilia, supported by public terms of reference, appointment of representatives by each constituency, decision-making rules, and an obligation for the Bank to provide a written response to each recommendation, using the Advisory Panel of the Amazonía Siempre Program as a reference.
- Prepare a section explaining how the Program will operate at each level of the IAP2 spectrum, assigning a level to each type of decision and specifying, for project-selection and prioritization decisions, at what stage consultation will occur and within what timeframe the Program will report back on how input was considered, in line with Articles 7.4 and 7.8 of the Escazú Agreement.