

## **Recommendations on the draft report on the potential integration of the World Bank Group's Independent Accountability Mechanisms**

The following comments and recommendations are submitted in response to the [findings](#) of the Task Force report. While the report is an important step toward strengthening the World Bank Group's accountability architecture, its focus remains largely on administrative and institutional integration and reorganisation. These comments therefore aim to highlight key structural gaps within the existing framework that merit further consideration, and on which the Task Force could also advance recommendations, particularly with respect to ensuring meaningful access for project-affected communities, strengthening the enforceability of outcomes, and recognising the political and institutional contexts in which these mechanisms operate.

### **1. Structural Barriers to Access**

The report acknowledges, but does not adequately address, that project-affected communities often lack awareness of the existence of IAMs, and cannot distinguish between WBG entities financing the project. The primary remedy, the adoption of a unified web portal, offers a largely technocratic, digital solution to what is a structural issue of accessibility.

The proposed integrated portal, while presented as a step toward improving accessibility, does not address the structural barriers that limit community access to accountability. The current system continues to place the burden of awareness, navigation, and engagement on project-affected communities themselves. Additionally, as noted in the report, there is no binding requirement on World Bank borrowers or IFC/MIGA clients to explicitly disclose the existence of the IAMs to affected communities. This absence of disclosure requirements is a fundamental gap in accessibility and reflects a deliberate design choice rather than operational oversight.

In practice, communities are expected to identify harm, understand the distinctions between multiple grievance and accountability mechanisms. While the introduction of the portal seeks to centralise the complaints portal, communities still have to navigate a complex institutional system and does not necessarily resolve these challenges to access. In countries like India, structural constraints, including limited access to formal education and literacy, inadequate internet access, and other systemic barriers further restrict meaningful participation. As a result, access to accountability is often mediated through civil society organisations, making it uneven and contingent rather than universally accessible.

### **Recommendations**

1.1 Mandate compulsory disclosure of IAMs at every stage of the project cycle.

1.2 Ensure locally contextualised and accessible awareness of accountability mechanisms, moving beyond digital solutions by requiring field-level engagement with communities through offline, culturally appropriate, and language-sensitive methods.

1.3 Institutionalise proactive outreach and support for community access by establishing dedicated resources within the IAM framework for sustained outreach.

### **2. Complaints Driven Process, Expansion of Suo Moto Powers of IAMs**

The current IAM framework remains largely complaint-driven, placing the burden of initiating accountability on project-affected communities. While the report recognises that the CAO has suo motu powers of investigation, it also notes that these are rarely used. This underscores a broader limitation that even where proactive tools exist, they are treated as exceptional rather than integral to the accountability system. There is also no equivalent mechanism on the public sector side, the IPN has no

self-initiation authority. Therefore, in majority of WBG lending, proactive accountability is structurally impossible regardless of how serious or predictable the harm may be.

In contexts where communities face barriers such as limited awareness, fear of reprisal, or lack of capacity to engage with formal processes, a complaint-dependent model risks excluding those that are genuinely affected. Addressing this requires proactive oversight by IAMs, especially for projects classified as high-risk. Such an approach anchors accountability in risk assessment and enables early intervention, which can prevent harms before they occur/escalate. Rather than operating primarily as post-facto reviewers, focused on compliance findings and subsequent remedial measures, IAMs should function as preventive institutions that identify, flag, and respond to risks before impacts occur.

The report also identifies cost-effectiveness as part of its mandate, noting that the combined budget for IAMs in FY26 and FY27 is approximately USD 26 million. However, this framing presents IAMs primarily as a financial burden on the Bank, while overlooking the far greater and unquantifiable costs borne by affected communities, including loss of livelihoods, environmental damage, and the erosion of living traditions and indigenous knowledge systems. Moreover, the cost of IAMs represents only a fraction of the Bank's overall project investments.

## **Recommendations**

2.1 Establish mandatory proactive engagement for high-risk projects. Moving beyond a complaint-driven model by institutionalising proactive investigations by IAMs, especially in high-risk projects. IAMs should be required to actively monitor and initiate investigations where credible risks or harms are identified, rather than waiting for affected communities to come forward.

2.2 Remove structural barriers to independent investigation. Self-initiating authority should be vested in the IAMs, without reliance on complaint thresholds or Board approvals.

### **3. Weak Enforceability and Limited Remedial Authority Undermine Accountability**

A key limitation of the current framework is the continued absence of enforceability in IAM outcomes. As noted in the report's assessment of effectiveness, IAMs primarily contribute to remedial action through influencing management responses rather than mandating them, but lack the authority to ensure that such findings translate into time-bound remedies. Since IAM findings do not automatically trigger time-bound or binding corrective measures, there are no clear consequences for non-compliance or delay even where communities have succeeded in establishing harm or non-compliance.

Further, the IAMs lack the authority to define what constitutes adequate remedy. Without the power to set outcome-oriented standards or require corrective action, accountability risks becoming procedural rather than substantive, focused on compliance review rather than justice and redress. With the final remedial action subject to management and Board discretion across IAMs, the institution under review retains significant control over the nature, scope, and timing of the response. Due to the inadequacy of satisfactorily addressing the concerns raised by the communities, delay and inability to hold the Bank/IFC accountable for implementing time-bound and acceptable remedial actions, the trust and credibility of IAMs have eroded over time. This has been compounded by the Bank's consistent weakening of these mechanisms.

## **Recommendations**

3.1 Ensure full institutional and functional independence of IAMs. IAMs must operate independently not only in conducting investigations, but also in determining remedial outcomes, free from undue management or Board influence, or at minimum with an equal and independent decision-making role.

They should be empowered to define and require outcome-oriented remedies that are directly linked to identified harm and instances of non-compliance.

### 3.2 Empower IAMs to order interim measures, including suspension of project activities.

IAMs should be granted the authority to recommend or trigger the temporary suspension or modification of project activities where there is prima facie evidence of harm or risk of irreparable damage. Allowing projects to continue, and often reach completion during the course of dispute resolution or compliance investigation entrenches harm and renders accountability processes ineffective.

3.3 Establish binding timelines and consequences for non-compliance. The framework should introduce clear, time-bound obligations for implementation, along with escalation mechanisms and consequences in cases of delay, dilution, or non-compliance. This should include embedding ex-ante obligations within project and financing agreements to address post-exit scenarios, ensuring that responsibility for remedy is clearly defined and enforceable even after project closure or client exit.

3.4 The current reliance on client-led compliance and monitoring reporting creates inherent conflicts of interest and undermines credibility. IAM frameworks should institutionalise independent monitoring systems, overseen by IAMs, that include meaningful participation of affected communities and third-party experts jointly identified by communities and clients.

## **4. Risk of Dilution through Creation of a New IAM Structure**

The Task Force report proposes the option for the structural integration of the World Bank Group's IAMs and the potential creation of a new and unified IAM, which raises concerns regarding the dilution of existing institutional strengths.

Creating a new mechanism risks eroding the differentiated strengths of IAMs in the name of harmonisation, especially if these are not explicitly protected against a tendency to shift toward the lowest common denominator. Such an approach would require dismantling the distinct mandates that could weaken procedural rigour and reduce institutional autonomy.

It is also important to recognise that IAMs are not just administrative entities set up by the WBG, but are an outcome of struggles by communities from around the world, often facing repression from their governments - reflecting the recognition that the harm caused by Bank-funded projects can be enormous, and if left solely to the clients and the Bank, communities are unlikely to get redress. Their design reflects hard-won safeguards aimed at addressing power asymmetries between communities and institutions. Any reform process must therefore build on these foundations rather than subsume them within a centralised structure that may prioritise efficiency over accountability.

The question before the Task Force is not just whether IAMs are better integrated, but whether they are more effective for project-affected communities. In this regard, the Task Force's mandate should also encompass recommendations on substantive reform of the Performance Standards and environmental and social policies that govern Bank operations. Without strengthening the underlying standards to which IAMs hold the institution accountable, procedural reform alone is insufficient.

## **Recommendations**

4.1 Protect and retain differentiated strengths across IAMs. Ensure that key features such as time-bound processes, independent investigation authority, etc., are explicitly retained and strengthened, not harmonised downward.