HOW TO COMPLAIN ABOUT A PROJECT FUNDED BY THE AGENCE FRANÇAISE DE DÉVELOPPEMENT/ FRENCH DEVELOPMENT AGENCY?

A Guide to the AFD Environmental and Social Complaints Mechanism (AFD-CM)

If the Agence Française de Développement/French Development Agency (AFD) has funded or supported the project that is causing you harm, you may be able to file a complaint with their accountability mechanism, the Environmental and Social Complaints Mechanism (AFD-CM).

Get started: Understanding the AFD and AFD-CM

WHAT IS THE AFD?

The Agence Française de Développement **(AFD)** is France's official development finance institution. It is a public development bank under the French government that provides loans, grants, technical assistance, and guarantees to support economic and social development in countries across Africa, Asia, the Middle East, Latin America, and the French overseas territories. AFD's official mission is to fight poverty and promote sustainable development, in line with France's international development and climate commitments. AFD also oversees **Proparco**, its private-sector financing arm, which has a separate page and a separate complaints office in this guide.

WHAT IS THE AFD COMPLAINTS MECHANISM?

The AFD has an independent accountability mechanism: the Environmental and Social Complaints Mechanism (**AFD-CM**). The AFD-CM was established in 2017 to receive complaints about the environmental and social impacts of AFD-funded projects that are implemented outside of France.

If you are, or may be, affected by an AFD-funded project, that is or will be implemented outside of France, you can file a complaint with the AFD-CM.

The AFD-CM is made up of an Ethics Advisor (which oversees the AFD-CM), an Internal Mediator (often occupied by the Ethics Advisor in practice), as well as Complaint Office staff (currently one), and regularly hires external experts to support components of its work. Unless it is necessary to distinguish between them, this Guide will refer to all of these actors collectively as the AFD-CM.

Note, that if your complaint is found to be eligible, the AFD-CM has two functions to try to resolve the complaint: **dispute resolution** (also known as conciliation), and **compliance review** (also known as a compliance audit). In the early stages of the complaint process, the AFD-CM will make a proposal for how best to resolve it: through dispute resolution, compliance review, or both. You can learn more about the difference between dispute resolution and compliance review, and which option is better for your complaint on the homepage of this Guide.

DISPUTE RESOLUTION

The AFD-CM's voluntary dispute resolution process, also referred to as “conciliation”, aims to resolve issues collaboratively. During the dispute resolution phase, the AFD-CM will appoint a neutral facilitator/conciliator to facilitate dialogue between the complainants and the AFD client and/or project implementer (but not AFD itself). The goal of dispute resolution is to reach a mutually agreeable solution to the issues raised in the complaint.

Dispute resolution is a flexible process and depends on the willingness of all parties to participate. If an agreement is reached, the facilitator will help the parties to formalize it in a signed agreement, and the AFD-CM will monitor its implementation. If the process fails, this part of the complaint process will be closed.

You can learn more about this phase below.

COMPLIANCE REVIEW

At the AFD-CM, the fact-finding investigation process is called “compliance review” or a “compliance audit”. During the compliance review, the AFD-CM hires an external expert to investigate whether AFD has complied with its environmental and social policies, and whether any non-compliance has contributed to harm to the community. The external expert then prepares a compliance report with its findings and recommendations for corrective actions.

AFD Management is required to respond to the report and propose actions to address the findings. Once this Action Plan is approved by the AFD Executive Board, the AFD-CM monitors the implementation of these actions.

You can learn more about this phase below.

How to file a complaint

CAN YOU COMPLAIN TO AFD-CM?

Before filing a complaint, ask yourself the following questions. If your answer is YES to all of the questions, then you can complain to the AFD-CM.

Project: Is the project funded by the AFD and will it be implemented outside of France (and the French Overseas Territories)?

> The AFD-CM accepts complaints about all projects approved for financing by the AFD, that are or will be implemented outside of France and the French Overseas Territories. Complaints may be filed within two years after discovering the harm(s) and within a maximum of five years after AFD has made its final disbursement of project funds.

Tip: You can find information about AFD projects and their status in the AFD Project Database, via an information request, or email your question to transparence@afd.fr.

Impact on you: Is the project causing you harm (or could it)?

The AFD-CM accepts complaints from:

- One or more people, group(s) of people, and/or organization(s) who are experiencing (or at risk of experiencing) harm as a result of an AFD-funded project.
- Authorized representatives can file a complaint on behalf of affected individuals or communities.

Important: Complaints cannot be submitted anonymously, but you can request confidentiality regarding your identity or sensitive information. If you fear retaliation, notify the AFD-CM immediately to discuss protective measures.

Environmental and social harm: Is the harm (or anticipated harm) related to environmental and social impacts caused by the project?

The AFD-CM exclusively receives complaints about environmental and social harm caused by AFD projects.

Attempted resolution: Have you tried addressing the issue with the project implementer?

The AFD-CM requires that complainants attempt to resolve concerns with AFD's client and/or the project implementer, in particular by using the project-level grievance mechanism (if any) before submitting a complaint to the AFD-CM. If you are not able to meet this requirement, for example due to fears of retaliation, bad experiences with project stakeholders, or severe communication barriers, you should explain this in your complaint.

ONLINE COMPLAINT FORM

The AFD-CM has developed an online form to submit a complaint. You do not need to use this online form, but it may provide a practical starting point for your complaint. Once submitted, the AFD-CM will acknowledge receipt of your complaint. The form is available here: https://www.afd.fr/en/form/submit-environmental-and-social-complaint.

COMPLAINT FILING CHECKLIST

Download checklist

- ☐ **Format:** Submit your complaint in writing via online form, email, postal mail, or hand delivery to an AFD office in France or overseas. There is no specific format required. Complaints may be written in English, French, or the official language(s) of the country where the project is located.
- ☐ **Complainant details:** Your complaint should include the name of each person or (formal) organization filing the complaint, as well as names and contact details for key community representatives. If you have a representative, include signed written authorization providing authority for the representative to represent you.

- ☐ **Project details:** Provide the name and location of the AFD-supported project, along with any additional details (e.g. sector, company name, project name, location). The project must be implemented outside of France to be eligible for the AFD-CM. You can find information about projects in the AFD Project Database, via an information request, or by emailing transparence@afd.fr.
- ☐ **Description of environmental and social harm:** Explain the harm you are experiencing or fear, supported by facts and evidence, as well as the date that you became aware of this harm (or potential harm).
- ☐ **How AFD has failed:** Explain how the AFD has caused or contributed to this harm, for example by failing to comply with its Environmental and Social Risk Management Policy.
- ☐ **Prior efforts to resolve the issues**: Detail any efforts you have made to resolve the issues with the AFD's client and/or the project implementer (and if you haven't made those efforts, why not). You should also provide details of the results of these efforts and why they are not satisfactory to you.
- ☐ **Confidentiality:** Indicate if you require confidentiality due to fear of reprisals or for other reasons.
- ☐ **Addressed to the AFD-CM**: You should clearly state that you want your complaint addressed by AFD-CM.
- ☐ **Optional:**

  Including the following can strengthen your complaint:

  - Indicate whether you prefer dispute resolution/conciliation, compliance review, or both.
  - Your preferred outcomes or remedy.
  - Additional supporting material: maps, photos, media reports, copies of communications (even if they are unanswered) etc.
  - Your preferred communication method (e.g. email or post).
  - Any concerns about risks of retaliation or security issues.

STRENGTHEN YOUR COMPLAINT BY REFERENCING AFD POLICIES

When filing your complaint to the AFD-CM, you may want to reference AFD policies that were violated. Environmental and social safeguard policies play an important role in your complaint. These safeguards are rules and policies designed to identify and mitigate risks associated with AFD activities, with an overarching goal of preventing environmental and social harms. Understanding these safeguards is essential for anyone seeking to hold banks accountable for harms associated with their investments.

The AFD-CM receives complaints related to the environmental and social aspects of AFD operations, including concerns that the AFD has failed to comply with its Environmental and Social Risk Management Policy for AFD-funded Operations and its Exclusion List, which are explained below.

NOTICE: Including references to these policies is **optional** but can strengthen your complaint by identifying clear grounds for AFD's accountability.

AFD GROUP POLICIES

Environmental and Social Risk Management Policy (E&S Policy) 2017

The E&S Policy applies to all projects financed directly or indirectly (through another bank) by the AFD. The E&S Policy places the following obligations on AFD and its clients:

- **Risk Assessment:** Every project must undergo environmental and social due diligence before approval to identify potential harms and design measures to avoid, minimize, or offset them.
- **Stakeholder Engagement:** For high and substantial risk projects, the environmental and social risk assessments and action plans must be subject to a free, prior and informed consultation of the people potentially affected by the project, as well as civil society representatives involved in environmental and social issues. Consultations must be transparent, accessible, and culturally appropriate.
- **International Standards:** In addition to its own standards, AFD applies global frameworks, including:
  - World Bank Environmental and Social Standards
  - World Bank Group's Environmental, Health and Safety Guidelines (EHSG).

    More information about the World Bank's safeguards are available on the World Bank page of this Guide. Taken together, these standards require that AFD projects:

    - Integrate protections for community health and safety, the climate, biodiversity, pollution prevention, and resource efficiency into its project assessments and financing decisions,
    - Pay special attention to Indigenous peoples, women, and marginalized communities, ensuring their rights, cultures, and livelihoods are respected,
    - Avoid involuntary resettlement where possible. If unavoidable, AFD projects must provide fair compensation, livelihood restoration, and respect for international best practice, and
    - Respect International Labour Organization (ILO) standards, including prohibition of child and forced labor, safe working conditions, and freedom of association.
- **Other Human Rights, Development, and Climate Commitments:** The AFD also commits that the projects the AFD it finances 'contribute to France's ODA strategy, the implementation of the 2030 global agenda and the 17 Sustainable Development Goals, as well as the 2015 Paris Climate Agreement.'
- **Monitoring and Supervision**: AFD must monitor projects during implementation to ensure that environmental and social commitments are being followed. This includes checking compliance with safeguards, reviewing corrective measures, and adjusting requirements if risks change.
- **Transparency and Accountability:** AFD commits to publishing project information and ensuring affected communities have ways to raise concerns and seek redress.

Exclusion List AFD Group
Revised 2022

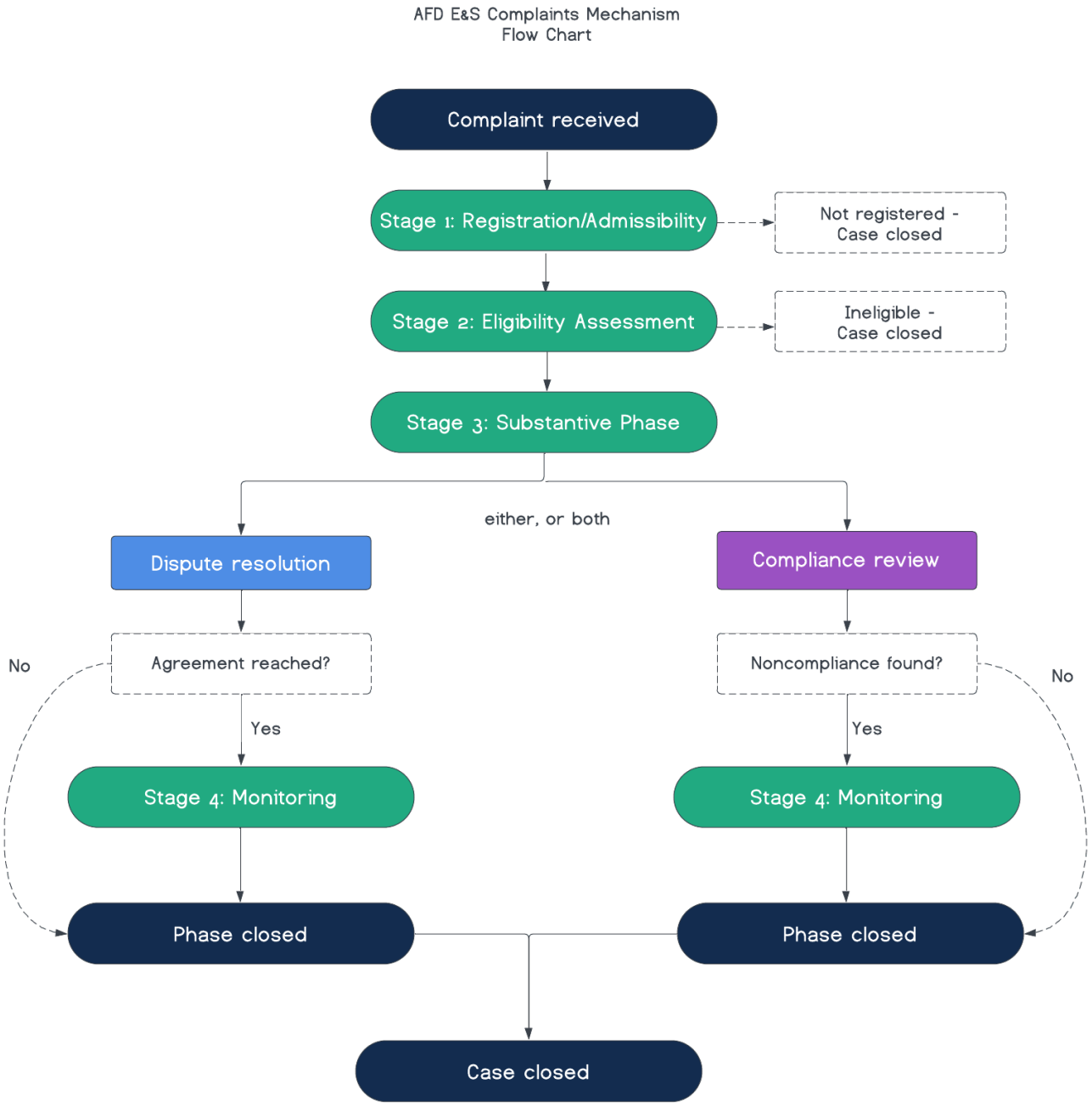
- The AFD Group is not permitted to finance certain activities, including -
  - Any activity that is illegal under the laws of the host country or or of France;
  - Any project involving forced labour or child labour;
  - An irreversible harm to nationally- or internationally-recognized cultural heritage;
  - Fossil-fuel projects, including projects related to: fossil-fuel power plants; infrastructure associated with producing, storing or processing fossil energy resources (mines, processing facilities, storage, etc.) or for generating electricity from fossil energy sources; and the exploration, production, processing, or exclusive transportation of coal, gas and oil;
  - Projects within world heritage sites or legally protected areas;
  - Large scale forest or agriculture projects that result in deforestation;
  - Projects whose purpose and/or approach are inconsistent with human rights;
  - Projects resulting in forced eviction that is is materially impossible to compensate;
  - Among others.

WORLD BANK POLICIES

The World Bank Environmental and Social Framework
Effective October 1, 2018

The World Bank requires its clients to comply with ten performance standards, relating to: Assessment and Management of Environmental and Social Risks and Impacts; Labor and Working Conditions; Resource Efficiency and Pollution Prevention and Management; Community Health and Safety; Land Acquisition, Restrictions on Land Use and Involuntary Resettlement; Biodiversity Conservation and Sustainable Management of Living Natural Resources; Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities; Cultural Heritage; Financial Intermediaries; and Stakeholder Engagement and Information Disclosure. You can find more information on the World Bank page of this Guide.

Complaint process: What happens after submitting a complaint?



Stage 1: Registration & Admissibility

> Within ten working days of receiving your complaint (note that this may take longer if the complaint is sent to a local AFD office first), the AFD-CM will acknowledge receipt of the complaint to the complainant(s) and/or their representative(s). The AFD-CM will also inform relevant AFD Management staff about the complaint.

The AFD-CM will register your complaint if it includes all of the required information set out in the Complaint Checklist above. The complaint will not be registered if:

- The concerns raised about the project are not environmental and social concerns, or they are outside of the scope of AFD's Environmental and Social Risk Management Policy.
- The complaint is about fraud, corruption, unfair competition, or procurement (buying goods and services). These kinds of issues are sent to another office at AFD.
- The complaint is about a project that AFD did not fund.
- The complaint is about a project that is located within France or the French Overseas Territories.
- The complaint is about issues that were already dealt with in a past complaint, unless the new complaint raises new facts or harms that were not known before.
- The complainant has not tried (or refused to try) the other dispute resolution options offered by the project implementer, unless they can show it was not possible to use those options in good faith.
- The issue has already been settled through a court case, mediation, arbitration, or another type of dispute resolution (outside of the project's own grievance mechanism). If a complaint was previously, or is currently, filed with another bank's complaint office/accountability mechanism, it will be important to identify any new facts or other good reasons that justify a fresh process (such as that the issues were not "settled" or that there are particular issues relating to AFD's actions that warrant review by the AFD-CM).
- The issue is currently before a court, unless the court and/or the parties have agreed to pause the case to allow for conciliation/dispute resolution through the AFD-CM.

If your complaint is registered, the AFD-CM will proceed to the formal eligibility stage.

If your complaint is not eligible for registration, the AFD-CM will either: (a) ask you for additional information to fill any information gaps; or (b) close the complaint and inform you in writing about this decision.

Stage 2: Eligibility Assessment

All registered complaints will then enter a formal eligibility phase. Although the AFD-CM calls this phase "eligibility", it is more similar to what is known as "assessment" at other complaint offices.

The purpose of this phase is to better understand the underlying reasons for the issue(s) raised in the complaint along with the perspectives and positions of the parties involved. It is based on an analysis of the eligibility requirements (described above in the registration section), as well as a detailed document review, and interviews with the complainants(s), AFD's client, the project implementer (if different), and the AFD project team and local staff. It may also involve a field visit. The AFD-CM will also specifically assess whether the complaint is suitable to be addressed through dispute resolution and/or compliance review.

In addition to the primary eligibility criteria already mentioned in the complaint filing checklist and the registration sections above, the AFD-CM will also consider some additional factors at this stage.

A complaint will be found ineligible if:

- It is clearly frivolous, malicious, or aimed at gaining unfair personal or financial advantage.
- It is about the actions of a third party other than the AFD or its client.

A complaint will be found “eligible” for dispute resolution/conciliation specifically if:

- The issues have not already been fully handled by another bank’s complaint office (for example, if the project was co-financed by another bank), unless there are new facts or other good reasons that justify a fresh process,
- Moving forward would not interfere with any other process started by the complainant (or some members of the complainant group) or by the AFD client, and
- The complainant agrees to share their identity with the AFD’s client and/or the project implementer.

A complaint will be found “eligible” for compliance review specifically if:

- It concerns acts or omissions for which AFD is responsible, such as where AFD’s Environmental and Social Risk Management Policy may not have been implemented properly, and
- The complaint points to more than a minor technical breach of that Policy, or shows that the harm caused is significant.

Note that a complaint can still go to compliance review even if another bank’s complaint office is also reviewing it, since the AFD-CM’s compliance review will look at AFD’s own compliance with its policies (not the other bank): see section 6(d) of the AFD CM's Rules of Procedure.

Once the AFD-CM has finished its review, it prepares an Eligibility Assessment, which it sends to the Eligibility Committee for its review and final decision. The Eligibility Committee is composed of the Complaints Office staff and a representative from each of the following AFD departments: Compliance, Legal, Environmental and Social Support, Final Evaluation and Strategy. It is chaired by the AFD-CM’s Ethics Advisor, who ensures that decisions are independent. Decisions are made by consensus when possible, or otherwise by majority vote. The representative from AFD’s environmental and social support department does not vote.

A summary of the eligibility assessment, the Eligibility Committee’s conclusions (Eligibility or Non-Eligibility), and the proposed complaint resolution function (dispute resolution or compliance review) are all published by the AFD-CM on its website.

Stage 3: Substantive Phase

All complaints that have been found eligible by the Eligibility Committee should then enter a substantive phase. The Eligibility Committee will recommend either **dispute resolution** or **compliance review** as the next step, or both.

DISPUTE RESOLUTION

Dispute resolution is a voluntary process where the AFD-CM appoints a facilitator (known as a “conciliator”) to facilitate a “conciliation” process between you (the complainant), AFD’s client, and/or the project implementer (if different). The facilitator may be the AFD Internal Mediator or an external expert, as recommended by the Eligibility Committee.

This dispute resolution process can and should be designed and implemented by the parties together with the facilitator. The aim of a dispute resolution is to reach an agreement between all the parties, and find a mutually agreeable solution to your concerns.

The facilitator will start by explaining their process, and inviting the parties to indicate whether or not they wish to participate.

Voluntary: Since dispute resolution is voluntary, any party can choose not to participate and participation requires consent from all involved. If parties agree to participate, communities can share their concerns about the project directly with the AFD's client, and advocate for specific solutions to their concerns. If some or all of the parties do not wish to engage in dispute resolution, the AFD-CM will close this part of the complaint.

Outcome: If the parties reach an agreement, the facilitator will help them to formalize those solutions in a signed agreement. AFD-CM will then monitor its implementation. If no agreement is reached, this part of the complaint process will be closed. Upon completion of this phase, the facilitator will prepare a report on the results of the dispute resolution.

For more details on the dispute resolution process, refer to the Rules of Procedure of the AFD-CM.

COMPLIANCE REVIEW

If your complaint is found eligible for compliance review, the AFD-CM will hire an external expert to conduct an investigation (known as a compliance review or compliance audit). The expert's job is to check whether AFD failed to follow its Environmental and Social Risk Management Policy in relation to the project.

The expert reviews project documents (to the extent that they are authorized to access them, either by the AFD's financing agreement, or by express consent of the AFD client), consults with the complainants, AFD, AFD's client, and other stakeholders, and may carry out site visits.

The expert then prepares a draft report with findings on whether AFD complied with its Environmental and Social Risk Management Policy. If the draft report finds that AFD has failed to comply with the Environmental and Social Risk Management Policy, it will also include recommendations for how AFD can bring the project into compliance, and how to avoid similar issues in the future.

The Rules of Procedure for the AFD-CM directs the CM to share a copy of this draft report with the AFD (but not the complainants) for feedback. Based on the comments, the expert can modify their draft recommendations, but not the proven factual findings. After considering AFD's comments, the expert issues a final Compliance Review Report.

If AFD is found compliant, the case is closed and the final report is published.

If non-compliance is found, AFD Management must prepare an Action Plan describing how it will address the project's shortcomings. Although it is not explicitly required by the Rules of Procedure, we understand that in practice the AFD-CM (or its experts) will ensure that complainants are consulted on specific actions that the AFD or its client intend to take at the project-level, to resolve the issues identified by the AFD-CM's report.

Once approved by the AFD Executive Board, this plan is shared with the complainant, AFD's client, and posted on AFD's website (unless the parties request otherwise). The Rules of Procedure for the AFD-CM expressly notes that the Action Plan will not include financial compensation from AFD.

For more details on the compliance review process, refer to the Rules of Procedure of the AFD-CM.

Stage 4: Monitoring

If your complaint goes through a dispute resolution process and results in an agreement, or goes through a compliance review and results in an Action Plan, then the complaint will enter a monitoring phase.

DISPUTE RESOLUTION

If an agreement is reached, and if desired by the parties, the facilitator will monitor the implementation of the agreement for a limited, mutually agreed period of time. It appears that little information about this monitoring process is published: only brief updates in the AFD-CM's annual reports.

COMPLIANCE REVIEW

If the AFD was found to be non-compliant with its environmental and social policies, and an Action Plan was approved by the AFD Executive Board, the AFD-CM will monitor the implementation of that Action Plan.

Throughout the monitoring process, the AFD-CM will prepare regular status reports and send these to AFD Management. These status reports are not published, but a summary of them will be included in the AFD-CM's Annual Report.

The AFD-CM will close the monitoring phase when it believes it is no longer necessary.

Real stories of communities who have filed IAM complaints

Assessing AFD-CM's performance

COMPARISON TO BEST PRACTICE

✓

Independence: The AFD-CM’s reporting line is independent from bank management; it reports to an Executive Board.

✗

Independence: However, other features of the AFD-CM’s process lack independence. For example, the Eligibility Committee – which decides whether complaints proceed to a substantive phase – is made up of representatives of AFD Management as well as AFD-CM staff. While we understand that the Management representatives are from the Compliance, Risk and Law Units (not Operations), we nonetheless believe that Eligibility should be a decision for the AFD-CM exclusively.

✗

Transparency: Although the AFD-CM provides some transparency, there are some important gaps. The AFD-CM only publishes a summary of complaints and of its eligibility decisions. While final compliance review reports are disclosed, only a limited amount of monitoring information is made public. Its list of cases on its website is not updated regularly.

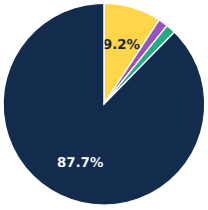
✗

Remedy: While the AFD-CM can make recommendations for actions that should be taken to address areas of non-compliance, it does not explicitly have a mandate to recommend remedial measures to address harm to communities. Its Rules of Procedures explicitly state that Action Plans will not involve the payment of financial compensation by AFD. We understand that remedy is a topic that will be addressed in the AFD-CM's revised policy (a work in progress).

A LOOK AT THE DATA

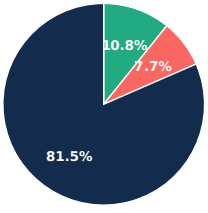
We have brought together some charts, based on the latest data available in the Complaint Dashboard, to offer a deep dive into the AFD-CM's performance.

Complaint Outcomes



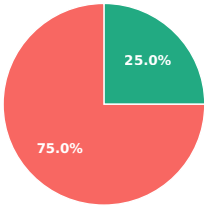
Active	6	9.2%
Monitoring	1	1.5%
Closed With Outputs Outside Process	1	1.5%
Closed Without Outputs	57	87.7%

Eligibility



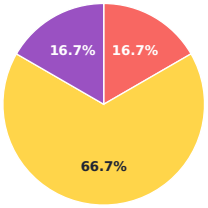
Eligible	7	10.8%
Ineligible	5	7.7%
In Progress	0	0.0%
Not Undertaken	53	81.5%

Dispute Resolution Outcomes (when undertaken)



Successful	1	25.0%
Unsuccessful	3	75.0%
In Progress	0	0.0%

Compliance Review Findings (when undertaken)



Compliant	0	0.0%
Non-Compliant	1	16.7%
In Progress	4	66.7%
No Output	1	16.7%

Complaint issues

Unknown	38
Corruption/fraud	11
Displacement (physical and/or economic)	8
Procurement	7
Environmental	5
Consultation and disclosure	3
Biodiversity	2

Complaint sectors

Infrastructure	4
Regulatory Development	0
Community capacity and development	0
Agribusiness	0
Energy	0
Conservation and environmental protection	0
Education	0

Figures are numbers of complaints recorded in the Accountability Console for this mechanism, as of the download date.

POLICY RECOMMENDATIONS TO STRENGTHEN THE AFD-CM

AFD-CM should not automatically exclude complaints that have been subject to judicial or other dispute resolution proceedings. The Rules of Procedure should allow the AFD-CM to make flexible, case-by-case assessments with a view to identifying any issues (especially those related to AFD's own policies) that are unresolved by those prior proceedings. (GPP 34)

Complainants should be allowed to review and provide comments on draft compliance review reports. (GPP 52)

The Rules of Procedure should explicitly allow complainants to review and provide comments on draft action plans prepared in response to findings of non-compliance (currently practice rather than policy). (GPP 55)

AFD should be allowed to participate in the dispute resolution process, as long as the other parties consent. (GPP 64)

Contact AFD-CM

https://www.afd.fr/en/e-s-complaints-mechanism

To send complaints:

reclamation@afd.fr

Online complaint form:

https://www.afd.fr/en/form/submit-environmental-and-social-complaint
E&S Complaints Mechanism
Agence Française de Développement
Secrétariat du Dispositif de gestion des réclamations environnementales et sociales
5, Rue Roland Barthes
75598 Paris Cedex 12
FRANCE

Or to contact an AFD Field Office: https://www.afd.fr/en/our-agencies-around-world

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