HOW TO COMPLAIN ABOUT A PROJECT FUNDED BY THE IDB GROUP?

A Guide to the Independent Consultation and Investigation Mechanism (MICI)

If the IDB Group has funded or supported the project that is causing you harm, you may be able to file a complaint with their accountability mechanism, the Independent Consultation and Investigation Mechanism (MICI).

Understanding IDB Group and MICI

WHAT IS THE IDB GROUP?

The IDB Group is a multilateral development bank headquartered in Washington, D.C., that provides financing to both the public and private sector in Latin American and Caribbean countries. The IDB Group is made up of three entities: the Inter-American Development Bank (**IDB**), IDB Invest, and IDB Lab.

IDB

> The Inter-American Development Bank (**IDB**) is a regional development bank that finances government projects. The IDB was established in 1959, and provides loans, grants and technical assistance to the public sector in Latin America and the Caribbean. Its mission is to reduce poverty and inequality, and promote sustainable development in those regions.
>
> In addition to MICI, if you are affected by an IDB project you can also raise a complaint with the IDB Grievance Protocol (GP), a management-led process to receive and resolve complaints. You can access the IDB complaint form for IDB projects at this link. Although using the GP may be a more efficient strategy for resolving simple issues, these mechanisms lack the rigor, transparency and independence of MICI.

IDB Invest

> IDB Invest (previously known as the Inter-American Investment Corporation - IIC) is a regional development bank that finances corporate activities. IDB Invest was established in 1984 to promote private sector development in Latin America and the Caribbean. It provides financing, advisory services and technical assistance to small and medium-sized companies and financial institutions.
>
> In addition to MICI, if you are affected by an IDB Invest project you can also raise a complaint with their Management Grievance Mechanisms (MGM), a management-led process to receive and resolve complaints. You can access the MGM for IDB Invest projects at this link. Although using the MGMs may be a more efficient strategy for resolving simple issues, these mechanisms lack the rigor, transparency and independence of MICI.

IDB Lab

> IDB Lab (previously known as the Multilateral Investment Fund - MIF) finances start-up initiatives to promote regional innovation and growth. IDB Lab was established in 1993, and provides financing, knowledge and connections for early-stage investments.

WHAT IS MICI?

The IDB Group has an independent accountability mechanism: the Independent Consultation and Investigation Mechanism (also known as MICI). MICI receives complaints related to the environmental and social impacts of IDB Group-funded projects. If you are affected by an IDB Group-funded project, you can file a complaint with MICI.

To file a complaint, you need to provide specific information about the issue you are experiencing, as outlined in the “How to file a complaint” section.

If your complaint is found to be eligible, MICI has two functions to try to resolve the complaint: **dispute resolution** or **compliance review (also known as investigation at MICI)**. You can decide which process you would like your complaint to enter if found eligible. If you want to try both dispute resolution and compliance review, you are required to try dispute resolution first. 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

At MICI, the voluntary dispute resolution process is called the “**dispute resolution**” phase. During this dispute resolution process, the MICI team will facilitate dialogue and negotiations between the affected communities, the IDB Group’s client, and the IDB Group, with the goal of reaching a mutually agreeable solution. You can learn more about this phase below.

COMPLIANCE REVIEW

At MICI, the fact-finding compliance review process is called the “**investigation**” phase. During this compliance review phase, MICI investigates whether the IDB Group has complied with its environmental and social policies, and whether any non-compliance has caused harm to the community. MICI then prepares an investigation report that includes its findings and recommendations for the IDB Group. You can learn more about this phase below.

How to file a complaint

CAN YOU COMPLAIN TO MICI?

Before filing a complaint, ask yourself the following questions. If your answer is **yes** to all of the questions, then you can complain to MICI.

Funding: Is the project funded by the IDB Group?

> MICI accepts complaints about all IDB Group projects from the date of their approval until up to 24 months after the last disbursement by the IDB Group entity. You may be able to find this information in the IDB Group's project databases (there are separate project databases for IDB, IDB Invest, and IDB Lab), via an Access to Information request (here for IDB, here for IDB Invest), or by contacting MICI directly for help.
>
> If you are complaining about a project that is not yet approved, you can still submit a complaint, but it will be forwarded to and handled by IDB Management rather than MICI. If the project is subsequently submitted to the IDB Board for approval, the project documents will include a summary of the complaint, with management's response and any action taken in regard to it.

Impact on Community: Is the project causing harm (or is it anticipated to cause harm) to two or more people in the community?

> Are those people living in the country where the project is being implemented?
>
> **Important:** Your complaint cannot be anonymous, but you can request confidentiality regarding your identity or other information you submit to MICI. If you are facing reprisals or fear retaliation be sure to tell MICI and discuss how they can support you to address the risk of reprisals.
>
> Duly appointed representatives can represent affected communities.

Harm: Is the harm related to environmental and social impacts caused by the project?

> The harm is related to negative environmental and/or social impacts caused or likely to be caused by the IDB Group-financed project.

Attempted Resolution: Did you contact the IDB Group Office?

> If you don't fear retaliation, you are required to contact the IDB Group Office in your country or its headquarters in Washington D.C. to let them know about the problem and give them an opportunity to address it **before** contacting MICI. You can find the contact details for IDB Headquarters and Country Offices on its website here. When filing a complaint, submit a description of any good faith communication you had with bank staff. Keep copies of all communications (even if they are unanswered), and notes from all meetings, with Management to submit with your description.
>
> **Important:** If you are facing reprisals or fear retaliation, you can skip this step and go directly to MICI. Tell them why you did not contact the IDB Group Office, if you would like them to keep your identity confidential, and discuss how they can support you to address the risk of reprisals.

MODEL COMPLAINT LETTER

We have developed a model complaint letter tailored for MICI. This template provides a practical starting point for your complaint, designed to help you effectively convey your concerns. Once submitted, MICI will acknowledge receipt of your complaint.
Download complaint letter

COMPLAINT FILING CHECKLIST

Download checklist

- ☐ **Format:** File the complaint in writing. There is no specific format required.
- ☐ **Complainant details:** Include the name of each person complaining, and contact details for key representatives. If you have a representative, include signed written authorization giving them the authority to represent you.
- ☐ **Confidentiality:** If you need confidentiality due to fear of reprisals, explain why.
- ☐ **Project details:** Provide a description and location of the project. Include any other details you know (e.g. sector, company name, or project number). You can find project information on the IDB Group's website (there are separate project databases for IDB, IDB Invest, and IDB Lab), or through the DeBIT tool or Early Warning System (databases you can search).
- ☐ **Description of harm:** Provide a detailed description of the harm you have experienced or believe you may suffer in the future as a result of the project. Explain why you feel the IDB Group is responsible for this harm.
- ☐ **Evidence of attempted resolution:** Describe any efforts you have made to contact IDB Group staff to try and resolve the issue. Explain what reply you received, if any. If you can, include a copy of the communications between you and the IDB Group. If you have not previously contacted the IDB Group due to fear of reprisals , then explain why.
- ☐ **Choice of process:** State which process you want to enter if your complaint is found eligible. You can choose dispute resolution, compliance review, or both. If you need more information before making this choice, you can ask us or ask MICI for advice.
- ☐ **Optional:**

  Including the following can strengthen your complaint:

  - Specify which IDB Group policies, guidelines or procedures you believe were not followed (if known).
  - Include any other relevant information, document or materials.

STRENGTHEN YOUR COMPLAINT BY REFERENCING IDB GROUP POLICIES

When filing your complaint to MICI, you may want to reference bank 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 bank 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.

MICI receives complaints related to all "Relevant Operational Policies," including environmental safeguards, gender policies, and information disclosure policies, which can be found below.

Including specific policy references is **optional** but can strengthen your complaint by identifying clear grounds for IDB's accountability.

IDB POLICIES

IDB Environmental and Social Policy Framework
Applies to projects approved from 1 November 2021

The IDB Group requires its projects to meet the following environmental and social standards:

Standard 1: Assessment and Management of Environmental and Social Risks and Impacts

This standard requires the borrower (IDB Group's client) to assess and manage environmental and social risks of projects, take precautions to reduce negative impacts, encourage better environmental and social practices, address complaints, and involve and inform people affected by the projects.

Standard 2: Labor and Working Conditions

This standard protects workers rights, promotes fair treatment, non-discrimination, compliance with laws and safe working conditions. It prohibits child labor and forced labor, promotes freedom of association and provides effective channels to address workplace concerns.

Standard 3: Resource Efficiency and Pollution Prevention

This standard safeguards human health and the environment by promoting sustainable use of resources, reducing pollution from project activities, minimizing project-related emissions and waste generation, and managing pesticide risks

Standard 4: Community Health, Safety, and Security

This standard aims to avoid and minimize adverse impacts on the health, safety and security of project-affected people as a result of project activities. This includes infrastructure safety, hazardous materials management, ecosystem services, disease prevention, emergency preparedness, and security personnel conduct.

Standard 5: Land Acquisition and Involuntary Resettlement

This standard aims to avoid or minimize displacement, forced eviction and adverse social and economic impacts of projects, by compensating for lost assets, minimizing disruption to social networks, and ensuring appropriate disclosure of information and consultation. It also aims to improve or restore the livelihoods and living standards of displaced persons and provide safe and secure housing at resettlement sites.

Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

This standard promotes the conservation and sustainable management of biodiversity and natural resources.

Standard 7: Indigenous Peoples

This standard safeguards the rights, culture and natural resources of Indigenous peoples, by avoiding or minimizing adverse impacts of projects, promoting sustainable development, establishing ongoing consultation, ensuring Free, Prior and Informed Consent (FPIC), and preserving Indigenous Peoples' culture and knowledge.

Standard 8: Cultural Heritage

This standard safeguards cultural heritage from project activities and promotes fair sharing of benefits derived from its use.

Standard 9: Gender Equality

This standard prevents risks and negative impacts based on gender, sexual orientation, and gender identity, promotes inclusion and safe participation, and upholds legal and international commitments related to gender equality throughout the project cycle. Where avoidance of these risks is not possible, this standard aims to mitigate and compensate for impacts of sexual and gender-based violence, including sexual harassment, exploitation, and abuse.

Standard 10: Stakeholder Engagement and Information Disclosure

This standard establishes a systematic approach to stakeholder engagement, assessing stakeholder views, promoting inclusive engagement with project-affected people, disclosing information on environmental and social risks and impacts, and providing accessible channels for stakeholders to voice their concerns and grievances.

Access to Information Policy 2025
Effective September 1, 2025

The IDB published a new Access to Information Policy in 2025. Key features include:

- Recognizing that access to information as a fundamental human right
- Establishing a presumption of disclosure to maximize access
- Clear and specific exceptions to that presumption of disclosure
- Introducing a harm test to determine confidentiality levels (full or partial)

Past IDB Group Policies
For projects approved before November 2021

Some relevant IDB Group policies for projects approved before November 2021:

OP-703: Environment and Safeguards Compliance Policy

This policy aims to integrate environmental sustainability outcomes in all bank operations and activities, ensure that they are environmentally sustainable, and promote corporate environmental responsibility to achieve sustainable economic growth and poverty reduction goals.

OP-704: Natural Disaster Risk Management Policy

This policy aims to assist borrowers in reducing risks from natural hazards and managing disasters to support their social and economic development goals through strengthening the Bank's effectiveness in managing risks and facilitating rapid assistance in response to natural disasters.

OP-708: Public Utilities Policy

> This policy sets out the IDB's commitment to promote universal access to and increase the efficiency and quality of public utilities service delivery, including water, sanitation, electricity, natural gas, solid waste, and telecommunication services, under conditions that are affordable and environmentally and socially sustainable, with a focus on financial, environmental, and social sustainability.
>
> **OP-710: Involuntary Resettlement Policy**
>
> This policy aims to minimize the impact of physical displacement caused by development projects, by avoiding it whenever possible, and providing fair compensation and rehabilitation when unavoidable, to ensure affected people have access to basic necessities.
>
> **OP-761: Policy on Gender Equality in Development**
>
> This policy aims to promote gender equality and empower women in Latin America and the Caribbean, through proactive actions that promote gender equality and empowerment, and preventative actions that safeguard, prevent or mitigate adverse impacts on people due to gender.
>
> **OP-765: Indigenous Peoples Policy**
>
> This policy aims to support the development of indigenous peoples by strengthening their identity and governance capacities while safeguarding their rights in Bank-funded development projects.

IDB INVEST POLICIES

IDB Invest Environmental and Social Sustainability Policy
Effective December 15, 2020

> The policy aims to promote good environmental practice, including pollution prevention, resource efficiency, climate change adaptation and mitigation, biodiversity and ecosystem services, and disaster risk management.
>
> The policy also commits to promote good international practice in all social aspects, including respecting human rights, promoting open and transparent stakeholder engagement, and protecting against reprisals. The policy also aims to manage gender risk and equality, respect the rights of indigenous people and other vulnerable groups, protect the rights of persons with disabilities, employ good labor practices, working conditions and health and safety practices, avoid forced eviction and involuntary resettlement, and providing accessible channels for stakeholders to voice their concerns and grievances.

IDB Invest Access to Information Policy
Effective January 1, 2020

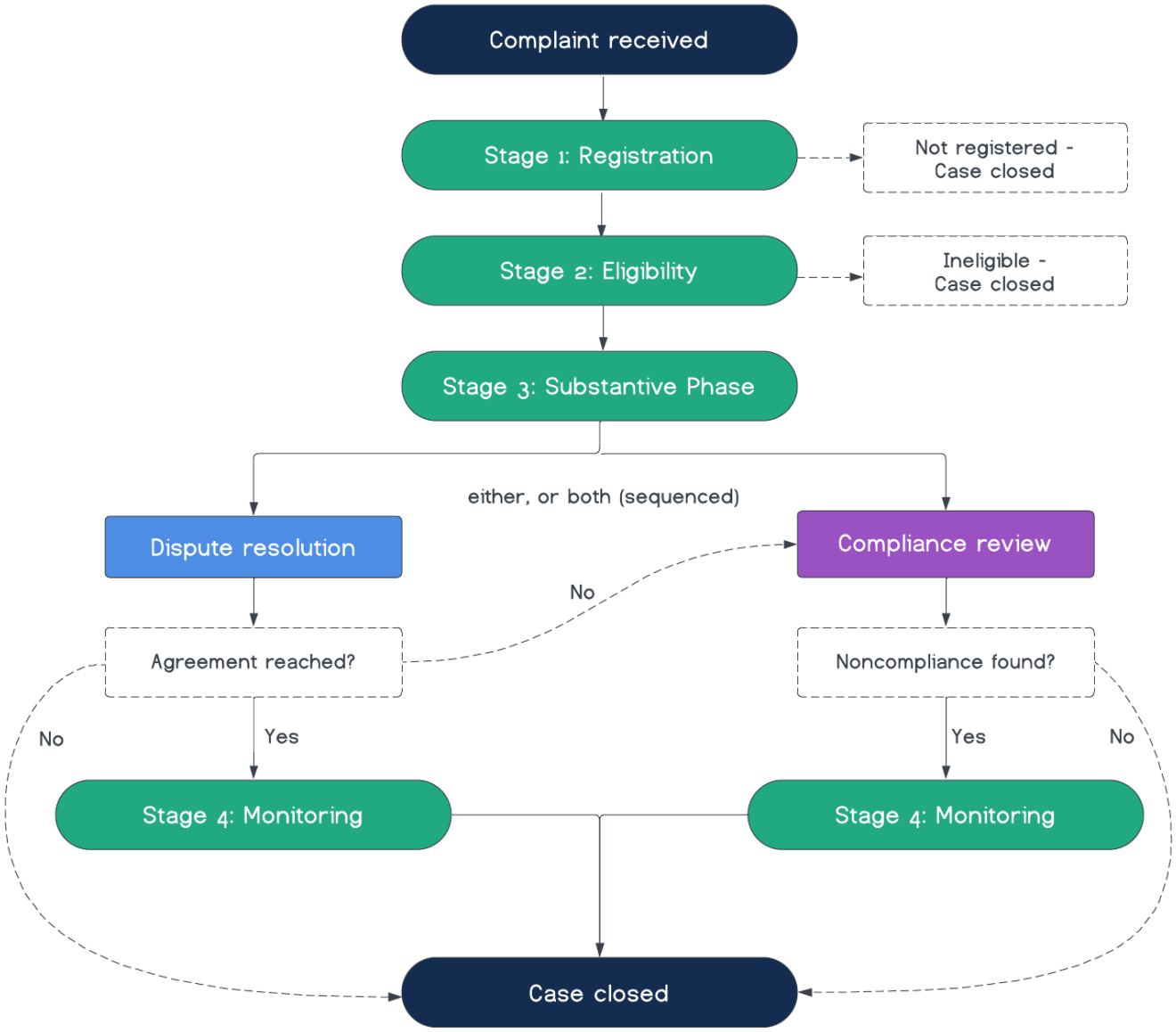
> This policy outlines IDB Invest's commitment to providing access to information to the public, with exceptions based on international standards, while respecting the confidentiality of information received from clients and third parties, and establishing clear procedures for requesting and reviewing access to information requests.

IDB LAB POLICIES

IDB Environmental and Social Policy Framework
Applies to Projects approved from 1 November 2021

> Similarly to IDB Policies mentioned above, the IDB Environmental and Social Policy Framework also applies to IDB Lab projects.

What happens after you file a complaint?



Stage 1: Registration

> After filing your complaint, MICI will decide whether to register your complaint or not. Your complaint will be registered if it meets MICI's requirements as outlined in the "How to file a complaint" section above.

Stage 2: Eligibility

If your complaint is registered, MICI will review it to determine whether it meets their eligibility criteria:

1. **Alleged violations:** The complaint must allege that the IDB Group has violated one or more of its own operational policies and procedures.
2. **Harm:** The complaint must relate to environmental and/or social harm caused or likely to be caused by the approved IDB Group project.
3. **Attempted resolution:** If the complainant has **no** fear of reprisals or retaliation, you must show that you have attempted to resolve your concerns with IDB Management. Keep copies of all communications (even if they are unanswered), and notes from all meetings with Management. Explain why you are disatisfied with their response (if you received any).
4. **Time limit:** The complaint must be filed within 24 months of the last disbursement by the IDB Group.
5. **Fresh evidence:** The issues raised in the complaint must be new. If MICI has already reviewed the issues, there must be new evidence or circumstances that were not available at the time of the initial complaint.

The MICI Director determines eligibility. If your complaint is found to be eligible, it will then be transferred to the next stage, being the substantive phase that you chose to enter when you filed your complaint.

Stage 3: Substantive Phase

All eligible complaints should then enter a substantive phase. As MICI you are given the option of a dispute resolution process called the dispute resolution phase, or a compliance review process called an investigation.

MICI will speak to you about which option you prefer. If no agreement is reached during a dispute resolution phase, or if the agreement does not address all the issues raised by the complaint, parties can choose to enter compliance review after the dispute resolution phase.

DISPUTE RESOLUTION

When a complaint is declared eligible for the dispute resolution phase, MICI will enter an assessment stage to gather information to understand the harm. Based on the results of the assessment, the complaint will either enter dispute resolution, or if collaborative resolution is not possible, the complaint will be forwarded to a compliance review phase.

As mentioned above, the dispute resolution phase is a voluntary dispute resolution process, where MICI acts as the facilitator between the community, the IDB Group’s client, and the IDB Group. The aim is to reach an agreement between all the parties, and find a mutually agreeable solution to your concerns.

A dispute resolution process can involve dialogue, joint fact-finding, mediation, negotiation, and facilitation. It is a voluntary process, and any party can choose not to participate. A community can share their concerns about the project directly with the IDB Group and its client, and advocate for special solutions to their concerns. If the parties agree on solutions, MICI will help

them to formalize those solutions in a signed agreement. If no agreement is reached, the case will be transferred to Compliance. Upon completion of this phase, MICI will prepare a report on the results of the dispute resolution process.

If at any stage of this process a party no longer wants to continue with dispute resolution, the case is transferred to compliance review.

If you would like to know more about what a dispute resolution process involves, see the case study for Caracol Industrial Park below or MICI's Dispute Resolution (Consultation) Phase Guidelines.

COMPLIANCE REVIEW

When a complaint is transferred to the compliance review phase, MICI will prepare a recommendation and terms of reference for the investigation. This will include the objectives of the investigation and the issues to be investigated. MICI will then submit this recommendation to the Board of Executive Directors jointly with Management's comments. The Board will then make a decision based on this recommendation. If approved, the complaint is then investigated.

As mentioned above, the compliance review phase is a fact-finding process, where MICI acts as the investigator to investigate whether the IDB Group has complied with its environmental and social policies, and whether such non-compliance has caused harm to the community.

After investigating, MICI prepares an investigation report with its findings and recommendations. The IDB Group then has a specified period to respond to the report and indicate the actions it will take to address the concerns raised. Finally, MICI presents its report to the Board, which determines what action to take, including whether Management should develop an action plan to address any non-compliance. The report is released to the public along with the Board's decision.

Stage 4: Monitoring

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

DISPUTE RESOLUTION

If an agreement is reached, MICI may develop a monitoring plan and timeline (not to exceed 5 years from the date the agreement was signed). If you have added monitoring procedures into your agreement, these would come into play at this stage.

The monitoring plan must then be approved by the Board. If approved, MICI will then monitor the implementation of this agreement. Monitoring can involve site visits, meetings, and regular reporting to the Board and the affected community.

COMPLIANCE REVIEW

If an investigation report is published, this report is provided to the IDB Group showing MICI's findings and recommendations. Management will then decide on an Action Plan that should be developed to address any non-compliance. The Board will approve the management action plan, and MICI will prepare a monitoring plan and timeline (not to exceed 5 years from the date on which the Board approves the plan). MICI will then monitor the implementation of the plan or other agreed remedial action.

Real stories from communities who have filed complaints



Caracol Industrial Park, Haiti

DISPUTE RESOLUTION

Assessing MICI's performance

COMPARISON TO BEST PRACTICE

✓

Independence: MICI's reporting line is independent from bank management; it reports to the Board of Executives.

✗

Independence: the Board has used its powers to stop MICI from investigating certain complaints: a problematic feature of MICI's structure.

✓

Transparency: MICI makes complaints, eligibility reports, final compliance reports, dispute resolution reports, and follow-up monitoring reports public.

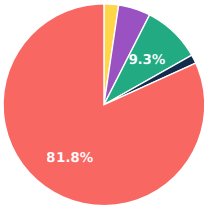
✗

Remedy: MICI can make recommendations for corrective measures to address areas of non-compliance, but does not explicitly have a mandate to recommend remedy for communities.

A LOOK AT THE DATA

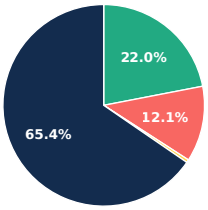
We have brought together some charts, based on the latest data available in the Complaint Dashboard, to offer a deep dive into the IDB Group and MICI's performance.

Complaint Outcomes



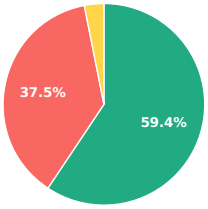
Active	5	2.3%
Monitoring	11	5.1%
Closed With Outputs	20	9.3%
Closed With Outputs Outside Process	3	1.4%
Closed Without Outputs	175	81.8%

Eligibility



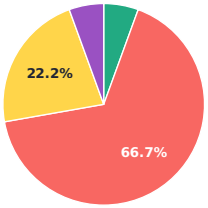
Eligible	47	22.0%
Ineligible	26	12.1%
In Progress	1	0.5%
Not Undertaken	140	65.4%

Dispute Resolution Outcomes (when undertaken)



Successful	19	59.4%
Unsuccessful	12	37.5%
In Progress	1	3.1%

Compliance Review Findings (when undertaken)



Compliant	1	5.6%
Non-Compliant	12	66.7%
In Progress	4	22.2%
No Output	1	5.6%

Complaint issues

Consultation and disclosure	68
Unknown	63
Displacement (physical and/or economic)	58
Environmental	53
Community health and safety	51
Livelihoods	50
Due diligence	49

Complaint sectors

Infrastructure	115
Community capacity and development	35
Regulatory Development	33
Energy	30
Conservation and environmental protection	22
Land reform	6
Agribusiness	5

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

RECOMMENDATIONS TO IMPROVE MICI

MICI's policy should not allow the IDB Board to object to a compliance review investigation. (GPP 46)

To strengthen its ability to prevent harm, MICI should be able to accept complaints about projects before they are approved by the Board. (GPP 30)

MICI's policy should allow it to self-initiate compliance reviews without having to receive a complaint. This would increase MICI's effectiveness in contexts where reprisals and restrictions on civic space make it too dangerous for project-affected communities to file complaints. (GPP 47)

Contact MICI

Independent Consultation and Investigation Mechanism (MICI): https://www.iadb.org/en/mici/mici-independent-consultation-and-investigation-mechanism

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