



Independent Complaints Mechanism
Public Consultation on the Draft Policy

Stakeholder Feedback Report

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1. INTRODUCTION

The Development Finance Institutions (the “DFIs”)—DEG, FMO, and Proparco—and the Independent Expert Panel (the “Panel”) wish to express their sincere appreciation to all stakeholders who participated in and supported the Independent Complaints Mechanism (ICM) Public Consultation (the “public consultation”) held from 20 August 2025 to 17 October 2025.

This report provides a consolidated overview of the feedback received from stakeholders during the public consultation. It explains how feedback was considered and integrated into the final ICM Policy and outlines responses from the DFIs to stakeholder feedback.

The final ICM Policy was approved by the DFIs’ Management Boards, and endorsed or acknowledged by their Supervisory Boards, in December 2025. The [final ICM Policy](#), along with a [redline version of the draft ICM Policy](#) showing the amendments, is available on the ICM Public Consultation website.

This report is structured as follows:

- **[Section 2](#)** summarizes the ICM Policy revision and update process after the public consultation.
- **[Section 3](#)** summarizes the key areas of positive feedback received from stakeholders in the written submissions, webinars, and in-person events.
- **[Section 4](#)** summarizes the main areas of concern expressed by stakeholders in the written submissions, webinars, and in-person meetings. A general response to each main area of concern has been included, indicating how the draft ICM Policy was revised to address stakeholder concerns or explaining why changes have not been made. In cases where the DFIs and the Panel maintain differing views on the final ICM Policy text, gray boxes have been included to show the Panel’s final view.
- **[Annex I](#)** contains background on the DFI’s E&S approach on financial intermediaries.
- **[Annex II](#)** summarizes discussions from the in-person meetings held in The Hague and in Nairobi during the public consultation.
- **[Annex III](#)** summarizes discussions from the webinars held during the public consultation.
- **[Annex IV](#)** details the responses provided by stakeholders through the online questionnaire.

2. THE ICM POLICY REVIEW AND UPDATE PROCESS

The DFIs are committed to achieve positive sustainable development outcomes through their investments. The ICM plays a central role in upholding this commitment by strengthening institutional accountability and supporting continuous learning across all three DFIs.

Over the last twelve years, the ICM has evolved significantly, reflecting both lessons learned from case experience and broader advances in international accountability practice. Since its establishment, the ICM has contributed to improved development outcomes, helped identify and address unintended harms, and provided a structured, constructive space for dialogue between affected communities, clients, and the DFIs. Its evolution reflects global good practices observed across independent accountability mechanisms (IAMs).

This stakeholder feedback report summarizes the contributions received during the public consultation and explains how they informed the finalization of the ICM Policy. The final ICM Policy reflects the shared commitment of the DFIs and the Panel to ensure that the ICM remains independent, robust, trusted, and aligned with international good practice—so that it can continue to serve as a meaningful pathway for raising concerns and facilitating access to remedy aligned with international guiding principles on business and human rights.

Over the 8.5-week consultation period, a diverse range of stakeholders—including national and international non-governmental (NGOs) and civil society organizations (CSOs), peer financial institutions, independent accountability mechanisms, DFI clients, and subject-matter experts—provided substantive feedback on the draft ICM Policy. A summary report on the public consultation activities is available for download: [ICM Public Consultation on the Draft Policy - Activity Report](#).

After the public consultation period, a joint working group—comprising the Panel and DFI representatives—continued its collaborative work to revise and finalize the ICM Policy. The working group included representatives from the DFIs' environmental and social (E&S) operational teams and from the policy and legal departments. Members of the DFI Supervisory Boards were also engaged at various stages during the final revision process.

The following process was followed:

- A specialized consultant hired to assist in the management of the public consultation process consolidated all stakeholder input—including written submissions, webinar contributions, and feedback gathered during the in person sessions in Nairobi and The Hague. This comprehensive consolidated feedback document was shared with the DFIs, the Panel, and the independent facilitator for consideration.
- The facilitator distilled the consolidated feedback document into a set of key comments and priority issues, giving particular attention to feedback that reflected the perspectives and experiences of complainants and potentially affected communities.
- The joint working group reviewed this list and supplemented it with additional points based on their own comprehensive examination of the full body of stakeholder feedback.

Throughout the process, the working group was guided by the overarching principles for the ICM Policy review, namely:

- ensuring consistency of the ICM Policy with the UNGPs;
- aligning the ICM Policy, as applicable, with good policies and practices of the IAM community;
- taking into account the specific governance and operational context of the three DFIs;
- safeguarding against regression from the 2014 ICM Policy;
- enhancing clarity on key ICM Policy points to support operational predictability;
- maintaining an appropriate level of detail in the Policy, acknowledging that ICM operational procedures will supplement it; and
- committing to the timely completion of the draft Policy by the ICM Plenary+, in line with the agreed work plan.

Through this structured consensus-building process, the working group resolved five of the seven differing views between the Panel and the DFIs that existed prior to the public consultation, and substantively addressed key areas of stakeholder feedback. As an example of the rigorous and collaborative process, the decision to allow a 12 month post exit complaint window represented a major concession by the DFIs and was done in direct response to strong stakeholder input. As described in Section [4.2 Financial Intermediaries](#), the post-consultation revision process introduced a new point of divergence between the Panel and the DFIs.

3. KEY AREAS – STAKEHOLDER POSITIVE FEEDBACK

Across stakeholder groups—including inter-governmental bodies, national and international NGOs and CSOs, government representatives, and subject-matter experts—there was broad appreciation for the improvements introduced in the draft ICM Policy. Overall, stakeholders recognized stronger alignment with international standards, enhanced independence, clearer processes, and expanded functions.

Stakeholder feedback on the key areas of improvement is summarized below.

3.1. Expanded Functions and Mandate

Stakeholders welcomed the addition of the advisory and outreach functions to the existing dispute resolution and compliance functions. Furthermore, the introduction of a formal monitoring mandate, for dispute resolution agreements and management action plans, was recognized as an important advancement.

3.2. Increased Independence, Governance, and Operations

Stakeholders expressed their appreciation for:

- establishing a Panel Chair to ensure the effective and efficient operation of the ICM.
- enhancing independence by introducing a five-year non-renewable term for Panel members.
- providing a clearer description of the selection process for Panel members and the role of the Panel.
- acknowledgment of the importance of operational dedicated staff.
- the annual budget for the ICM increases its independence.

3.3. Improved Accessibility, Predictability, and Transparency

Stakeholders expressed their appreciation for the:

- clearer timelines for processes, improving predictability.
- commitment to confidentiality when requested.
- commitment to making case-related documents and communications available in relevant languages, improving accessibility.

- requirement for management action plans to address issues raised in compliance review reports and the standard publication of management action plans.
- the explicit outreach function to ensure stakeholders understand the ICM's purpose, mandate, functions, and activities.
- greater detail on the measures that the ICM might take to minimize the risk of retaliation and support protection and the safety of Complainants

3.4. Compliance Review Process

Stakeholders expressed their appreciation for the single compliance review process of the ICM. Compared to other mechanisms (such as mechanisms of IFC, DFC, EBRD and AfDB) the ICM does not have a separate preliminary appraisal phase as part of the compliance review process. Instead, the Panel may close the compliance review process if it finds that there is no preliminary, or *prima facie*, evidence of non-compliance. Experts highlighted the merit of having such a single, seamless compliance review process.

3.5. Alignment with the UNGPs

Several stakeholders highlighted that the draft ICM Policy was more aligned with the expectations within the UNGPs, particularly those related to the effectiveness criteria for grievance mechanisms. The draft ICM Policy explicitly recognizes the ICM's mandate to provide access to remedy—an important improvement that emphasizes rights-compatibility. Stakeholders noted that the draft ICM Policy demonstrated stronger anchoring of corporate respect for human rights by DFIs and their clients..

4. KEY AREAS – STAKEHOLDER CONCERNS AND HOW THEY WERE ADDRESSED

During the public consultation, stakeholders expressed concerns about certain provisions in the draft ICM Policy that might permit management interference constrain the ICM's mandate, or hinder the independence of the ICM. There was a call for further revisions to guarantee the ICM's operational independence, allow the Panel to initiate compliance reviews independently, to strengthen anti-retaliation measures, to broaden the eligibility for complaints (post-exit) and to increase transparency. There were also several comments about the drafting and interpretation of the provisions related to financial intermediary complaints and a call to establish a more transparent, accessible and predictable process for this category of complaints.

Stakeholder feedback on the key areas of concern, and how these concerns have been addressed, is summarized below.

4.1. Post-Exit Complaints

There was strong and consistent support across stakeholder feedback for allowing the ICM to accept complaints after a DFI has exited a project.

Many stakeholders highlighted that harms frequently emerge only after financial closure, especially in cases involving complex social dynamics, cumulative environmental impacts or digital harms. Several stakeholders stressed that affected communities often do not know when the DFI-client financial relationship ends, making a strict cut-off unfair and impractical.

There was widespread concern that limiting eligibility to “active” relationships created a loophole that undermines accountability—enabling clients or the DFIs to exit early to avoid scrutiny.

To address this, many advocated a defined post-exit window, most commonly 24 months, calculated either from the date the DFI exits or from the date the harm becomes known to project-affected persons and communities. Stakeholders also emphasized that DFIs retain meaningful leverage after exit—through reputational incentives, future financing relationships, and peer-institution coordination—making post-exit accountability both feasible and necessary.

Several inter-governmental bodies, national and international NGOs and CSOs, government representatives, and subject-matter experts, underlined that post-exit eligibility was already standard good practice among peer IAMs.

Client stakeholders expressed concerns about extending the ICM’s mandate beyond the end of the financial relationship. They noted that once a loan is fully repaid or an equity relationship concludes, the contractual basis that underpins cooperation between the client, the DFI, and the ICM no longer exists. According to these views, continued engagement after exit would be difficult to justify both legally and operationally, as clients typically do not agree to obligations that extend beyond the life of the financing agreement.

Some clients also highlighted uncertainties about how long complaints would remain eligible post-exit and whether complaints submitted shortly before or after exit might create confusion about the client’s ongoing responsibilities. Others pointed to the potential administrative burden of continuing processes after the relationship has ended and emphasized the need for clarity to avoid unintended incentives or disincentives around the timing of a client’s exit. Overall, client feedback reflected a preference for clear boundaries and predictable timelines, expressing caution about the mechanisms that would require continued participation after contractual ties had formally ceased.

How the Comments were Addressed

The draft ICM Policy was updated to allow complaints to be submitted to the ICM within a 12 month post-exit window, addressing stakeholder concerns and accommodating clients’ preference for clear boundaries.

Clause 6.15 was added to the final ICM Policy:

Eligibility Assessment
[...]

6.15 If an Exit has occurred, the IEP may, notwithstanding the requirement in 6.14b above, deem a Complaint eligible if:

- a the Complaint is submitted within 12 months after Exit;*
- b there are compelling reasons why the Complaint could not be made before the Exit;*
- c the cause of the Harm alleged in the Complaint occurred before the Exit;*
and
- d all other eligibility criteria are met.*

4.2. Financial Intermediaries

Several stakeholders raised concerns about how the draft ICM Policy handles complaints related to DFI Financed Operations involving financial intermediary clients, emphasizing that financial intermediary subprojects were typically the least transparent and most difficult for affected communities to identify or challenge.

Stakeholders expressed concern that the draft ICM Policy set up an overly complicated structure for financial intermediary complaints that is hard to understand and that will inappropriately exclude some categories of Complaints that are typically eligible under good practice.

Many stakeholders commented that the draft ICM Policy’s eligibility criteria—particularly distinctions between portfolio and asset class approaches and limitations tied to “use of funds”—risked leaving significant harms outside the scope of the ICM’s mandate.

Several NGOs and subject-matter experts cautioned that, within the use of funds financing structure, financial intermediary clients could circumvent accountability by simply substituting subprojects, and that restricting eligibility to only narrowly defined use of funds transactions contradicts the DFIs’ own requirements for financial intermediaries to apply environmental and social standards across their wider portfolios.

A wide range of stakeholders stressed the need for greater transparency on financial intermediary financing, calling on the DFIs to disclose which approach was used for each investment, to publish lists of financial intermediary subprojects to ensure that affected communities could trace DFI involvement.

Others highlighted that the draft ICM Policy placed too much emphasis on the contractual relationship with the financial intermediary—rather than on the actual environmental and social impacts—leading to accountability gaps.

Subject matter experts recommended interpreting financial intermediary related arrangements flexibly, noting the inherent complexity of financial intermediary financing. They urged that financial intermediary related complaints be permitted to proceed to compliance review and dispute resolution, also in the portfolio approach (within use of funds).

The DFIs and the Panel did not agree on the revision of clause 6.36 (b) in the final ICM Policy. The gray box below is the Panel’s final comment on the matter.

Panel Comment

The Panel notes that paragraph 6.36(b) limits Complaints related to Financial Intermediary operations where the Portfolio Approach was applied to **Compliance Review only**, excluding access to **Dispute Resolution**. The Panel considers that this restriction is not consistent with the purpose of the Mechanism, which aims to provide both Compliance Review and Dispute Resolution, where appropriate, especially for subprojects that are within the defined use of funds. In the Panel's view, blocking of the Dispute Resolution option for complaints related to subprojects within the use of funds represents a regression from the draft Policy that was published during the public consultation, as well as from the current ICM Policy.

The Panel believes that this change will draw significant negative attention from external stakeholders who participated in the public consultations and provided comments on the issue of complaints related to Financial Intermediaries.

The Panel therefore recommends revising paragraph 6.36(b) to allow Complaints related to operations under the Portfolio Approach to proceed to both Compliance Review and Dispute Resolution, at least when these complaints relate to subprojects within the defined use of fund.

Proposed revised text: "(b) If the Portfolio Approach was followed but the Complaint relates to a subproject within the defined use of funds, the Complaint may proceed to Compliance Review or Dispute Resolution."

To clarify, the Panel does not object to excluding DR for complaints related to subprojects outside the defined use of funds under the Portfolio Approach.

DFI Response

- **Complicated structure:** The DFIs recognize that the structure described in the draft ICM Policy text was complicated. The final ICM Policy reflects improvements and simplification in this respect. The DFIs also recognize that it would be beneficial to provide stakeholders with more background information on their risk-based approach

and this is provided below and in [Annex I: The DFI E&S Approach on Financial Intermediaries](#).

- **Information disclosure:** The DFIs acknowledge stakeholder concerns, but disclosure of client- and project-related information is governed by different policies and at different levels within each DFI and therefore cannot be amended through the ICM Policy. However, the DFIs are reviewing their information disclosure policies with regard to financial intermediaries in light of comments received during the consultation. It should be noted that the Portfolio Approach remains the preferred option for all three DFIs, while the Asset Class approach is applied only in specific, limited cases.

- **Panel comment box:**
 - Use of funds: As outlined [Annex I](#), the use of funds is de-coupled from the Environmental and Social (E&S) risk-based approach. Therefore, the DFIs think it is more clear to delete the concept of “use of funds” or “use of proceeds” from the final ICM Policy.
 - Because DFIs do not have direct contracts with the clients or subprojects of their financial intermediary clients, their ability to address issues in the portfolios of their financial intermediary clients through Dispute Resolution is often challenging due to a lack of leverage. As a result, from the point of view of the DFIs, the ICM should as a general rule rely on compliance review in financial intermediary-related Complaints. A compliance review assesses whether the DFI has correctly applied and implemented its own E&S policies—an area that is fully within the DFI’s control. An exception to the general rule, is made when the Asset Class Approach is used. When the Asset Class Approach is used, the DFI may have more leverage over the financial intermediary regarding the assets in the Asset Class and therefore the ICM could also facilitate dispute resolution between the financial intermediary client and communities affected by the subproject. Therefore, the option for Dispute Resolution is allowed in the case of the Asset Class Approach in the final ICM Policy.

From an E&S risk management perspective, the DFIs may apply the Portfolio Approach or the Asset Class Approach irrespective of the stated purpose of the loan. Therefore, the definitions related to financial intermediaries have been clarified on this point.

The final ICM Policy was also updated as follows:

- Clause 6.18 (e): The ICM will deem a complaint ineligible, “*if it is related to a Financial Intermediary where the DFI applied the Asset Class Approach, and the Complaint relates to an investment or activity that is not within the defined class or category described in the Asset Class Approach agreed with the relevant Financial Intermediary*”.
- Clause 6.36 (a): “*If the Asset Class Approach was followed and the Complaint relates to a subproject that is within the category or class of asset defined in the Asset Class Approach agreed with the Financial Intermediary, the Complaint may proceed to Compliance Review or Dispute Resolution*”
- Clause 6.36 (b): “*If the Portfolio Approach was followed, the Complaint may proceed to Compliance Review but not Dispute Resolution.*”
- Clause 6.36 (c): “*If the DFI Financed Operation is an equity investment in a Financial Intermediary, the Complaint may proceed to Compliance Review or Dispute Resolution.*”
- Clause 6.68: “*For Compliance Reviews of DFI Financed Operations with Financial Intermediary Clients where the Portfolio approach was applied, compliance will be tested primarily against whether the DFI adequately supported the Financial Intermediary Client in its development and application of an environmental and social risk management system commensurate with the environmental and social risks in its portfolio, and if not, whether any non-compliances contributed to Harm.*”
- Clause 6.69: “*Because a DFI does not have a direct contractual relationship with the subprojects of Financial Intermediaries, the influence or leverage that a DFI may have to facilitate resolution of the issues raised in the Complaint through its response to a Compliance Review will in many cases be limited.*”
- Clause 6.14: The clause 6.14 in the draft ICM Policy: “*If a Complaint concerns a Financial Intermediary subproject that is not within the specific use of funds as defined in the contract with the Client and where the Portfolio Approach has been applied in the contract between the DFI and the Financial Intermediary Client, the IEP will take into account the materiality of the financial link between the DFI and the subproject in determining the eligibility of the Complaint*” was deleted.

4.3. Policy Scope

Stakeholder feedback on Section 5. (“Policy Scope”) of the draft ICM Policy highlighted the following concerns:

- **Standards:** Many stakeholders argued that limiting the scope to each DFI’s Environmental and Social (E&S) policies is too narrow and risks weakening the ICM’s mandate. They emphasized the need to explicitly include all relevant international standards mentioned in or upheld through DFI E&S policies —such as the IFC Performance Standards, UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises, and EDFI Principles—and to allow reference to authoritative interpretations from UN bodies and other expert mechanisms.
- **Consistency among DFIs:** Several submissions raised concerns that relying solely on each institution’s internal E&S framework may lead to inconsistencies or even regression if one DFI amends its policies. They therefore advocated for a common minimum standard across DEG, FMO, and Proparco. Additionally, many stakeholders seek clarity that the ICM Policy applies to all DFI-financed operations without exceptions, including co-financed projects and those involving B-loan structures, to avoid accountability gaps.
- **Other:** Experts also highlighted the need for consistent terminology across definitions and Section 5 to prevent ambiguity. Others suggested expanding the scope to include relevant national laws and regulatory standards.

How the Comments were Addressed

- **Standards:** On further review of the draft ICM Policy and based on stakeholder feedback, it was evident that the ICM Policy needed to clearly distinguish between the *scope of application* (which projects fall under the ICM) and the *scope of standards* (which norms the ICM may consider) The final ICM Policy was updated to reflect these considerations and provide this clarity.

For scope of application, clause 5.1 and the definition of “DFI Financed Operation” were amended to clarify which projects fall within the scope of the ICM Policy:

“DFI Financed Operation means any activity or any asset of the Client that is or is going to be financed by DFI funds or from funds managed, in whole or in part, by the DFI where the Environmental and Social Policies of the DFI apply, and where Exit has not occurred. A very small proportion of DFI investments and activities are not defined as DFI Financed Operations, and are not covered by the DFI’s Environmental and Social Policies. These investments and activities are, short-term, and/or are non-operational. B-Loans are also excluded, as the DFI has no direct contractual relationship with the client.”

- 5.1. *This ICM Policy applies to all DFI Financed Operations.*
- 5.2. *In assessing eligibility, the IEP will determine whether the subject of the Complaint is a DFI Financed Operation. The DFI will provide the IEP with the information the IEP reasonably considers relevant for its eligibility determination.*

For scope of standards, the definition of “Environmental and Social Policies” was amended to:

“Environmental and Social Policies means the policies wherein the DFIs committed to ensure adherence to environmental, social and human rights standards such as the IFC Performance Standards and international human rights principles and standards like the UNGPs within their operations.

Specifically, the Policies are:

- a *in the case of DEG, the DEG Guideline for Environmental and Social Sustainability and the DEG Exclusion List;*
- b *in the case of FMO, the FMO Sustainability Policy, Exclusion List, and Position Statements; and*
- c *in the case of Proparco, the Environmental and Social Policy and Exclusion List of AFD Group applicable to it.”*

Accountability mechanisms of institutions such as IFC, EBRD, DFC, and FinDev Canada also treat scope this way: they refer to E&S policies rather than the underlying international instruments. The final ICM Policy therefore aligns with peer mechanisms by making clear that compliance will be assessed against the DFIs' E&S policies, not directly against the international standards that informed the development of those policies.

- **Consistency among DFIs:** As for uniformity of policies between the three DFIs, it is important to note that although the ICM is a joint mechanism, the three DFIs are separate and independent entities, with different focus areas, strategies and shareholder structures. Therefore, the E&S policies of the three DFIs are different, and the ICM will consider the E&S policies of each individual institution.
- **Other:** terminology and definitions were aligned in the final ICM Policy. As explained above, the scope of the final ICM Policy aligns with other mechanisms by referring to E&S Policies.

4.4. Transparency, Anonymity, and Confidentiality

Stakeholder feedback highlighted a shared understanding that confidentiality, anonymity, and transparency must be carefully balanced to ensure both safety and trust in the ICM process.

Many stakeholders—particularly those focused on human rights and the protection of human rights defenders—stressed that confidentiality was essential for safeguarding complainants, especially in contexts where reprisals were a risk.

Stakeholders requested that confidentiality be treated as a core principle, with complainant identities kept private unless explicit consent for disclosure is given. Several stakeholders noted inconsistencies in the draft ICM Policy and asked for clearer, more coherent confidentiality provisions, including a structured consent-based approach for managing sensitive information. At the same time, some stakeholders questioned the prohibition on anonymous complaints, arguing that anonymity should be possible in high-risk situations.

Alongside these protection-focused concerns, many stakeholders emphasized that transparency vital for legitimacy and accessibility. They requested a more comprehensive and user-friendly public complaints registry, publication of reasoned eligibility decisions, proactive disclosure of case documents, and clarity about timelines and processes.

Additional, stakeholders expressed that DFI transparency was essential for communities to understand whether their complaints would meet the ICM’s eligibility criteria—particularly in the context of more complex financial intermediary financing structures. Several stakeholders stressed that the ICM should have the authority to publish reports independently, to ensure that the DFIs could not influence the process. Across the submitted feedback, stakeholders consistently underscored that greater transparency must not come at the expense of complainant safety; rather, clear rules were needed to ensure both goals were met through thoughtful disclosure practices.

Clients emphasized the importance of maintaining strong confidentiality provisions within the ICM process, noting that early public disclosure of a complaint—particularly before any facts had been established—could cause significant reputational harm. Clients expressed concern that the draft ICM Policy only considered confidentiality protections for complainants, without sufficiently considering the legitimate interests of clients who may be damaged by premature disclosure. They also stressed that meaningful engagement required knowing the identity of the complainants, and that while they support measures to prevent retaliation, they considered full anonymity toward the client to be impractical and potentially obstructive to resolving concerns. At the same time, clients generally accepted the distinction between anonymity and confidentiality, viewing the ICM’s approach of prohibiting anonymous complaints—but permitting confidential handling of identities—as appropriate.

How the Comments were Addressed

The DFIs and the Panel share the general understanding that confidentiality, anonymity, and transparency must be carefully balanced.

The clause that states that anonymous Complaints are not accepted, but that if confidentiality is requested, it will be granted, was retained. In the experience of the Panel in dealing with cases, this provides sufficient flexibility to protect Complainants.

Some stakeholders provided concrete suggestions for revising the ICM Policy text and processes; however these were generally considered too operational and detailed to be included in the final ICM Policy. However, the suggestions were noted and will be reconsidered when internal guidelines are developed by the Panel Chair.

Clause 12 was amended to read:

“In carrying out its work, the ICM will apply a presumption in favor of disclosure of environmental and social information. The ICM may disclose information gathered by the IEP, staff or consultants in its reporting, while maintaining the confidentiality of information as required by relevant laws and other applicable DFI requirements and obligations.”

12.2 ICM reports will indicate where information has not been disclosed due to confidentiality considerations. No person or entity in the service of the ICM (including but not limited to: ICM staff, consultant, researcher, mediator, interpreter, translator or other technical expert engaged by the ICM) may release a document, or information based thereon, which has been provided or shared by the ICM on a confidential basis.”

4.5. Independence, Self-Initiation, Monitoring, and Budget

Stakeholders broadly argued that the draft ICM Policy allowed management influence, which risked undermining the ICM’s independence, credibility, and ability to address environmental and social harms effectively. Many stakeholders emphasized that independence must extend across all areas of the ICM’s work—operational, procedural, interpretive, and resourcing.

A recurring concern was that management retained leverage through its control of the budget, staffing levels, procedural updates, and the required “acceptance” by management of the Panel’s recommendations, creating pressure points that could narrow the Panel’s scope of action.

Stakeholders requested the possibility for the Panel to self-initiate a complaint, particularly for high-risk environmental or systemic issues or in situations where communities cannot safely or feasibly file complaints. There was also widespread support for independent interpretation of policies by the ICM.

Another common concern was the need for independent compliance monitoring, unconstrained by the management action plan. Many stakeholders stressed that all identified instances of non-compliance must be monitored—not only actions approved by the DFIs’ Management Boards. Stakeholders also noted that this issue was particularly significant because the management action plan is prepared by DFI management and

approved by the Management Board, and is not approved by an independent body, such as a Supervisory Board, as is the case in other accountability mechanisms—such as those of the IFC and DFC.

Similarly, there was strong alignment among stakeholders on governance safeguards, including transparent and externally chaired selection processes, independence from both DFI Management and Supervisory Boards, and structural protections to prevent management veto over investigations.

Stakeholders also commented that the ICM requires a stable, predictable, and sufficiently autonomous budget to manage caseload fluctuations, conduct fieldwork, and respond promptly to urgent situations (including retaliation cases).

NGOs highlighted that complaints vary dramatically in complexity: some involve a handful of individuals, while others span large geographic areas and multiple communities. As a result, they cautioned that having a fixed budget could undermine equity, especially when high-impact cases demand intensive facilitation, mediation, or community support. Many stakeholders argued that the ICM Policy should explicitly guarantee a minimum, safeguarded level of resourcing—not merely reference “adequate” funding, which was seen as vague and potentially subject to management discretion—with flexibility to scale in response to caseload volume and the complexity of cases that demand intensive facilitation, mediation, or community support.

Stakeholders also raised concerns about the risk of management influence where the ICM is dependent on the DFIs’ Management Boards for budget approvals and operational expenditures. Several stakeholders recommended shifting responsibility for ICM budget approval to the DFIs’ Supervisory Boards, or at minimum ensuring that the ICM can independently access funds for essential activities such as hiring experts, traveling to project sites, or responding to retaliation. Some contributors noted that delays caused by procurement or budget-approval bottlenecks (for example, requiring management approval even for minor expenditures) would severely impede the ICM’s ability to protect complainants in real time.

To safeguard independence, stakeholders proposed dedicated ICM staffing funded directly through a protected budget line; a preapproved contingency fund for urgent needs; and a clearer separation between DFI operations and the ICM’s budget and resources.

How the Comments were Addressed

Many of the drafting changes suggested by stakeholders to remove the perceived influence of the DFIs' Management Boards have been incorporated—for example, in relation to the Panel's interpretation of policies or the shape of remedial recommendations.

Scope of monitoring:

- The Panel and the DFIs agreed that the scope of ICM's compliance monitoring will be based on the management action plan. If the Panel's view is that implementation of management actions by the DFI would be substantially inadequate to resolve material instances of non-compliance and/or to facilitate access to remedy, the Panel may make findings and recommend additional actions by the DFI to resolve non-compliance and facilitate access to remedy.
- For legal and practical reasons, it is not feasible to have the Management Action Plan approved by the Supervisory Board. As is common in Europe, the DFIs have a two-tier board structure consisting of a non-executive supervisory board and an executive management board. Legally, the Supervisory Board cannot instruct the Management Board to act in a specific way or override or approve decisions by the Management Board.
- The supervisory board is not a sitting board and only meets four times a year. The management boards meet on a weekly basis. Therefore, while the ICM does not report hierarchically to the Management Board, the primary interlocutors for the Panel are the Management Boards of the respective institutions to ensure proper implementation of the ICM Policy.

Self-initiation for environmental and public interest complaints:

A number of stakeholders argued in favor of self-initiation by the ICM in cases where there are no communities harmed or complainants that are affected, for example in the case of public interest issues or harm to biodiversity or the environment. The ICM has been set up by the DFIs as a complaints mechanism to address complaints from people and the DFIs have alternative channels to receive feedback from civil society on aspects of their business that do not directly affect people as explained above.

This remains a point of disagreement between the DFIs and the Panel, as explained in the comment box from the Panel below. Since the DFIs have alternative channels available to address these complaints, the suggested edit from the Panel was not incorporated in the Final Policy.

Panel Comment

The provisions proposed under paragraphs 6.64 and 6.65 above show positive progress of the ICM Policy compared with the current ICM Policy. The Panel suggests **deleting sub-para 6.64(c)**. There may be other circumstances in which the ICM may receive information suggesting serious noncompliance relating to harms that may justify triggering a Compliance Review by the Management or Supervisory Board. Removing the condition in 6.64(c) would allow the DFI Management Board or Supervisory Board to receive the Panel's recommendation also in such circumstances beyond the specific scenario of reprisals issues.

Budget and Resources:

Compared to the existing ICM structure, the ICM is autonomous with regard to budget development and management. The Panel Chair will submit a budget on an annual basis, which will be approved by the three DFIs. The budget will include items such as costs for personnel, outreach, communications, travel and casework etc. and will include a contingent portion. Since costs also fluctuate based on caseload, the annual budget is prepared based on existing and expected case load. The Supervisory Board will review and acknowledge the ICM budget as part of its annual review of the DFI budget. The DFIs are committed to make adequate budget available to the ICM to execute its mandate and functions as set out in the ICM Policy. The DFIs are of the opinion that specifying line items of the budget in the ICM Policy is too operational and therefore did not add a specific minimum number of employees as requested by the Panel.

The Panel's view on this point is expressed below.

Panel Comment

The Panel is of the view that the ICM Policy should specify a minimum of at least three full-time dedicated staff to ensure the ICM has sufficient human resources to fulfil its mandate, with adequate representation in each of the three DFIs to reflect its tripartite structure.

5. CONCLUSION AND NEXT STEPS

The DFIs and the Panel would like to reiterate their appreciation and gratitude to all stakeholders who contributed to the public consultation process. The breadth of inputs received—submitted as formal written letters, via email, through the online questionnaire, the webinars, and in-person meetings—played a central role in shaping the final ICM Policy. Stakeholders' insights, reflections, and constructive engagement ensured that the review process was rigorous, meaningful, and grounded in a wide range of perspectives and experiences.

The final ICM Policy came into effect on 1 March 2026, and all new complaints received from this date onward will be handled in accordance with the updated policy. The DFIs and the Panel have also begun preparing the internal guidance, outreach materials, and operational adjustments needed to support a smooth transition.

ANNEX I: THE DFI E&S APPROACH ON FINANCIAL INTERMEDIARIES

The relationship between DFIs and the end-beneficiaries of financing provided through financial intermediaries (“FIs”) (i.e. the clients or subprojects funded by the FI), is inherently indirect. Lending through FIs, enables DFIs to support a broader and more diverse group of high-impact beneficiaries, many of whom would otherwise be beyond the DFI’s direct reach. However, the absence of a contractual link between DFIs and end-beneficiaries, limits DFIs’ direct influence over E&S outcomes.

The DFIs follow a risk-based approach to manage E&S risks and impacts associated with its FI clients. This approach also determines the E&S requirements agreed upon with FI clients. The DFIs use two mutually exclusive engagement models – the Portfolio Approach or the Asset Class Approach (see explanation box below)

Explanation Box: DFI E&S Approaches

The Portfolio Approach

Under this approach, E&S requirements apply to the FI’s entire portfolio. The objective is for the FI to implement risk-based E&S management across all its activities in the entire portfolio. DFIs typically focus on four key areas:

- 1) Environmental and Social Risk Management System (ESMS): the FI client must implement an ESMS proportionate to the E&S risks in its entire portfolio and integrate it into its credit processes.
- 2) Governance and capacity: The FI must allocate sufficient resources—staff, training, and tools—to manage E&S risks, with accountability at senior management level.
- 3) Monitoring and reporting: The FI reports E&S developments to the DFI. DFIs conduct risk-based monitoring to assess ESMS implementation and governance.
- 4) Grievance Mechanism: The FI should maintain an external grievance mechanism accessible to stakeholders.

The Asset Class Approach

Under this approach, E&S requirements apply only to a specific Asset Class to be financed rather than the entire portfolio. The DFI designs targeted E&S requirements, which adequately match the risk profile of the financed assets.

- High-risk asset classes (for example large-scale project finance): the FI is expected to adhere to IFC Performance Standards for the Asset Class.
- Low-risk asset classes (for example loans to small enterprises). An ESMS would be required which is proportional to the risks of the asset class. The DFI may support the FI in improving E&S risk management across its broader portfolio, but this is not imposed as a contractual obligation under the Asset Class Approach and depends on the willingness and capacity of the FI client.

Because money is fungible, loans cannot be traced back to the DFI or exactly tracked by the DFI. However, DFIs often specify the intended use of funds to align with the DFI's strategic objectives (for example SME financing to stimulate job creation or financing to women-owned businesses to support gender equality). The stated purpose of the loan and the reporting received from the FI on how funds were deployed, helps the DFIs to measure some of its development impact objectives (for example jobs created), but it does not create an additional link between the subproject and the DFI from an E&S risk management perspective.

Regardless of the use of proceeds or use of funds, the DFI will follow either the Asset Class Approach, or the Portfolio Approach.

ANNEX II: IN-PERSON MEETING SUMMARIES

29 September 2025 - Nairobi, Kenya

General, Budget, & Retaliation

- Draft policy was regarded as a good / progressive policy with elements aligned with other IAMs (MAP, self-initiation, outreach and advisory)
- There was a request for a simplified language version of the ICM Policy.
- CSO suggested to sharpen the relation section – would like to see more actionable provisions of what can be done when retaliation happens.
- There was a question about what the budget would be covering. Would there be budget allocation to support grassroots communities? It was also inquired whether budget could contain psycho-social support for complainants.

Scope & Functions

- Need for reference to relevant international standards in the ICM Policy scope.
- Monitoring is key for complainants as this is where real outcomes are made. Feedback that monitoring should be a separate function to show importance of this stage in process.
- Advisory: Explore possibility to co-author advisory reports with other stakeholders.
- Outreach: Allow for ability to work together with other stakeholders to improve outreach and conduct outreach activities.

Communication & Accessibility

- The importance of communication and information sharing - about ICM, its functions, processes, during complaint handling – in cultural appropriate ways and local languages – to improve accessibility. There is a role for ICM, but also DFI and clients to share information about ICM. The only way of communication according to the current draft policy is via website/email. This tool is too limited for people in remote areas without access to internet or technology/non-literary complainants. We received additional feedback that sometimes the emails sent to DFIs/ICM are bounced back, then there is no other communication tool.
- DFIs should better disclose information about projects including contractors involved, lenders, timelines. Especially for financial intermediary clients it is difficult to know what projects DFIs are invested in.

- Importance of community agency: addressing power imbalances and providing capacity building (e.g. women empowerment, psycho-social support). Especially in DR process.
- Allow complaints to be filed post-exit as complainants have little information about project timelines and harms may become known later in project cycle. Allowing post-exit complaints would also be part of a responsible exit strategy.
- Allow complaints to be filed by representatives of complainants or civil society organizations.

Compliance Review & Monitoring

- MAPs are a good development but need to ensure inclusiveness in the sense that affected people and CSOs provide input on the MAP. Key that monitoring function should have some ‘teeth’ / real power of effectiveness so that actions are implemented and address the harm.
- Concern was raised on what happens if there is divergence between Management and ICM, fearing that MAP can be stuck with Management because they do not agree with certain recommendations of the ICM.
- Monitoring is key for complainants and other stakeholders. It should be possible for Panel to monitor on the basis of CR report recommendations/ findings if the MAP does not reflect that.
- Suggestion to self-initiate Compliance Reviews by Panel if there is no complaint.

Case Transfer from Dispute Resolution to Compliance Review

- Feedback that ultimate responsibility should be with the complainants on whether to transfer or not. If case can go to CR even after successful DR, likely to create disincentives for client to go into a Dispute Resolution in the first place.

14 October 2025 – The Hague, The Netherlands

Main Take-Aways

- Strengthen transparency, outreach, and accessibility for affected communities.
- Clarify policy language on scope, deferral, governance, and eligibility to avoid ambiguity and ensure accountability.
- Empower the panel with independence, including self-initiation of reviews and discretion over deferral.

1. Policy Scope & Accessibility

- The ICM should be accessible, inviting, and safe for communities, especially in countries with weak rule of law and risks of retaliation.
- DFIs must uphold global standards and not just their own policies.
- Transparency and disclosure are critical. NGOs called for earlier and more transparent disclosures about DFI investments, noting difficulties in accessing information.
- Contracts as secondary sources: There was consensus that the ICM should be able to review contractual agreements with clients to clarify E&S obligations and gauge compliance by the DFI, not just rely on policy documents.

2. Deferral Process

- Clarity needed: The timing and discretion of deferral (pausing complaint handling) require clearer policy language. The panel should have sole discretion, and complainants' informed consent is important, balanced against risks of reprisals.
- Role of grievance mechanisms: Deferral should leverage the broader ecosystem of remedy, including client grievance mechanisms, but not be mandatory if risks are present.

3. Compliance Review

- Self-initiation: Strong support for the panel's ability to self-initiate compliance reviews, especially in contexts of shrinking civic space and retaliation risks.
- UNGP framework: The draft policy's use of UN Guiding Principles (UNGP) language was praised, but clarity is needed for those unfamiliar with it. The distinction between "linkage" and "contribution" to harm affects DFI responsibility and response.
- Post-exit complaints: There was debate about accepting complaints after the relationship ends, with recognition that leverage is limited (no contract) but not absent (other means).

4. Governance

- Independence and accountability: The relationship between the ICM, Supervisory Boards (SBs), and Management Boards (MBs) was discussed. Independence of the panel, budget allocation, and regular engagement with SBs are crucial. This must happen in the legal governance framework of the DFIs, which is different from MDBs.
- Clarity in policy language: The need for more specific language regarding governance structures, selection of staff, and budget processes was emphasized.

5. Financial Intermediaries

- Complexity of text: the drafting on FIs is complex and hard to follow, especially for those not familiar with FIs and the different E&S approaches.
- Transparency challenges: It is difficult for complainants to trace funding and understand whether asset class or portfolio approaches are used. More transparency is needed.
- Grievance mechanisms: Banks should ensure FIs have their own grievance mechanisms, as DFIs are often several steps removed from potential harm.

6. Safeguards Against Retaliation

- Explicit protocols: The ICM Policy should include commitments to investigate, prevent, and respond to retaliation, with budget provisions for protecting complainants.
- Role of NGOs and embassies: NGOs may play a role in safeguarding complainants, but DFIs could consider emergency budgets or frameworks for protection.

7. Eligibility

- Active financial relationship: The definition of when complaints can be accepted needs clarification. There was support for accepting complaints post-exit, recognizing ongoing impacts and limited but existing leverage.

8. Other

- Low number of complaints: The small number of complaints was noted, attributed to portfolio size and transparency issues. Outreach and accessibility should remain priorities.
- No regression commitment: The draft policy is expected to improve and not regress, with complainants' voices weighed heavily in finalization.

ANNEX III: WEBINAR DISCUSSION SUMMARIES

This Annex contains summaries of the webinar discussions that were hosted as part of the public consultation process.

The same presentation was used for all webinars and which all followed the same structure. Each webinar opened with the facilitator and DFI and Panel representatives outlining the purpose of the policy revision, the joint nature of the work between DFIs and the Panel, and the major updates in the draft ICM Policy, including expanded ICM functions, clarified scope, new processes (including the deferral, management action plans, financial intermediary-specific provisions), timelines, and governance arrangements designed to strengthen independence.

The presentations were jointly made by a representative of one of the DFIs and a Panel member. The webinars were facilitated by an independent facilitator and transcripts were prepared by an independent consultant. The summaries below are of the Questions and Answers portion of the webinars. Discussions from the webinars were taken into consideration in identifying key themes and summaries in the main report.

25 September 2025

The webinar was open to DFI clients only.

The webinar focused on three major issues: whether the ICM should retain jurisdiction after a financier exits a project, with clients arguing that oversight should end once contractual ties cease, while the Panel supported a limited post-exit window to allow communities to raise harm that occurred during financing; the complications of duplicate complaints filed across multiple institutions, where clients requested a single coordinated process, and both Panels and DFIs emphasized ongoing efforts to improve inter-mechanism collaboration; and concerns about malicious or vexatious complaints, with participants describing strategic misuse of mechanisms, and the Panel affirming that strengthened eligibility criteria, evidence requirements, and checks for repeat or bad-faith submissions already provide safeguards against abuse.

29 September 2025

The webinar was open to all stakeholders and hosted at time convenient for those located in Africa and Europe.

The webinar focused on questions and comments from civil society and NGO participants regarding transparency, budgeting, financial intermediaries, and post-exit responsibilities. Participants urged the publication of a response matrix to show how comments were addressed and asked about the ICM budgets for unpredictable caseloads and varying case complexity. The DFIs and the Panel explained the division between annual operational budgets and flexible, case-specific budgets, including provisions for mid-year adjustments.

NGOs welcomed stronger outreach commitments and raised concerns about the lack of funding for CSOs supporting affected communities, prompting the Panel to note current cost-coverage practices and its openness to refining guidance. Additional questions highlighted accountability challenges associated with financial intermediary portfolio approaches, the traceability of use of funds, and the risks of subproject substitution. In response, the Panel clarified how eligibility and review pathways would apply.

The discussion also revisited the contentious issue of post-exit eligibility, with DFIs emphasizing the loss of leverage once contractual relationships end, while the Panel continued to advocate for a limited post-exit window to address harms that emerge after financing concludes.

1 October 2025

The webinar was open to all stakeholders and hosted at time convenient for those located in Asia.

The webinar focused on questions and comments related to governance, financial intermediaries, independence, and post-exit eligibility. Participants sought clarity on the ICM's dedicated budget and contractual arrangements, prompting the DFIs to explain the new model in which the Panel Chair is hosted by one DFI under an independence-protecting contract and is responsible for managing the ICM budget. Much of the discussion centered on how financial intermediary-related complaints are assessed—distinguishing between use of funds and portfolio approaches, eligibility for

compliance review versus dispute resolution, and the practical limits of passing down ICM obligations through financial intermediary sub-contracts.

A major theme was the Panel's dissenting view on self-initiated—*sua sponte*—compliance reviews, arguing that the draft ICM Policy was too narrow by limiting such reviews only to reprisal-risk cases. Participants emphasized the need to allow action in situations involving environmental harm, social taboos, or information emerging from media or NGO reports. Independence concerns also featured prominently, with CSO participants highlighting risks of undue influence from DFI management and urging stronger safeguards.

Several questions revisited post-exit, with the Panel advocating for an 18- to 24-month window in line with IAM practice, while the DFIs stressed the loss of contractual leverage after exit. All agreed that once a case is admitted prior to exit, it must continue.

Additional issues raised included responsible exit, the role of Supervisory Boards in bilateral institutions, and improvements to deferral procedures—particularly the need to ensure complainant consent and to require functional, client-level grievance mechanisms when cases are deferred.

02 October 2025

The webinar was open to all stakeholders and hosted at time convenient for those located in the Americas.

The webinar focused on the themes of post-exit eligibility, financial intermediary accountability, independence, and equitable process design. Participants questioned the draft ICM Policy's strict bar on complaints submitted after a financial relationship ends, arguing—consistent with IAM practice—that impacts often surface later, early exits may be used to avoid scrutiny, and reputation-based leverage still exists post-exit. The DFIs, however, maintained that the loss of contractual leverage makes post-exit enforcement impractical.

There was extensive discussion of financial intermediary cases, including the complexities of the Asset Class and Portfolio Approaches, risks associated with unclear use of proceeds, the need for transparency so complainants understand eligibility, and concerns that limiting dispute resolution for portfolio-wide cases would remove an important avenue for remedy.

Questions on governance highlighted the importance of independence from DFI management, gaps in the draft ICM Policy’s scope language, and limitations in the definition of harm. Participants also raised issues around deferral, urging that complainants’ explicit consent—not just their “views”—be required, and emphasized the need for stronger complainant involvement and ICM oversight in MAPs.

Further concerns addressed the absence of guidance on frivolous or strategically motivated complaints, the need for clearer tenure rules for the Panel Chair, and operational challenges such as budgeting flexibility, procurement delays, and safety-related expenditures. Overall, the dialogue underscored broad support for improvements in the draft while identifying several substantive areas requiring refinement to strengthen predictability, transparency, and access to remedy.

ANNEX IV: ONLINE QUESTIONNAIRE SUBMISSIONS

As part of the public consultation process, stakeholders were given the opportunity to complete an online questionnaire. The comments received through the questionnaire (as below) were taken into consideration in the summary provided in the main report.

Does the policy sufficiently achieve accessibility to project-affected persons?

- Respondent 1: Satisfactory /YES
- Respondent 2: Yes, especially adopting a vigorous public awareness and outreach on the ICM principles and procedures
- Respondent 3: Section 6.3 - The policy should consider making it possible for people with disabilities (sight in particular) and illiterate people to use technology to record their complaints and verified through digital means.

What barriers in the policy might prevent project affected persons from utilizing the mechanism?

- Respondent 1: Access/use of e-communication, ICM information
- Respondent 2: (1) As a voluntary mechanism, project affected communities could become skeptical about a meaningful outcome from the mediation, limiting interest to utilize the mechanism. (2) The inability of extremely poor local communities to fund the ICM process and mediation. As such, it will be important for the ICM to provide funding support to the complaint communities when the complaint gets admissible.
- Respondent 3: see above

Are the processes in the policy clear and understandable? Please elaborate.

- Respondent 1: Yes
- Respondent 2: Yes
- Respondent 3: -

Is the independence of the ICM adequately safeguarded in the policy? If not, what is missing?

- Respondent 1: YES
- Respondent 2: -
- Respondent 3: Section 9.6 on support staff should be clearly defined. Should cover administrative and technical support to the panel. Is the tenure of the Panel chair 5 years. Should the seniority level of the panel chair be clarified. The equivalent of a director-general?

Does the new policy create a mechanism that you deem legitimate, impartial and trustworthy?

- Respondent 1: YES
- Respondent 2: Yes
- Respondent 3: -

Are the timelines specified in the policy reasonable?

- Respondent 1: Need a bit explicitly...refer to the my comments in the draft policy document
- Respondent 2: I agreed with the 21-day proposed recommendation of the panel
- Respondent 3: Section 6.12 I think within the eligibility timeline it will also be good to stipulate response times from DFI management and client when contacted by the panel during eligibility review to make it efficient. Section 6.81 - 60 days for a management action plan is long given that prior to that they've had factual review and comment. This should give management/client preliminary time to consider action. I think 40 days should suffice to make remedial action more prompt for the complainant

Are there ways in which the policy could be changed to deal with complaints more efficiently and effectively from the perspective of project affected persons?

- Respondent 1: YES...refer to my comments in the draft policy document
- Respondent 2: (1) I think the policy scope should include national laws and standards, not only the international standards /laws. (2) The policy should allow and state the exact duration of the window of opportunity that complaints could be considered after the end of the financial relationship ("post-exit") complaints about harm that was caused during the financial relationship may still be eligible for consideration by the ICM.
- Respondent 3: Section 6:13 should consider making the complaint exhausted dfi/clients operational grievances mechanism making the panel the complainant's last resort. There may be harms that may be serious and cross a threshold for dispute resolution and should be subject to compliance review directly (GBV for example abuse of rights of minorities/indigenous peoples etc)

Are the confidentiality provisions sufficient to protect complainants, and if not, what is missing?

- Respondent 1: OK

- Respondent 2: I think the confidentiality provision should not be a blanket over the entire case. Still, specific concerns within the case should be reviewed over time for possible adjustment if the risks are minimized during the mediation process. The confidentiality provision could likely be advantageous to the investors, especially where communities could engage in advocacy campaigns.
- Respondent 3: They are sufficient and good that it clarifies the limitations as well

Are the non-retaliation provisions sufficient to protect complainants, and if not, what is missing?

- Respondent 1: YES
- Respondent 2:

What key outcomes do you expect of the ICM?

- Respondent 1: Harmonious co-existence between projects and host communities
- Respondent 2: Stakeholders are aware of the ICM mechanism A fair and just outcome of the ICM resolution The affected complainants are justly remediated

Does the policy cover these outcomes, and if not, what is missing?

- Respondent 1: YES
- Respondent 2: Yes

How should the mechanism engage with complainants, DFI clients, and other stakeholders?

- Respondent 1: DFI Clients, Third party mediators
- Respondent 2: Training workshop, outreaches, collaboration, conferences, and information sharing
- Respondent 3: Consider holding case review round tables

What role should civil society organizations play?

- Respondent 1: Mobilize/sensitize communities to understand and appreciate the existence, function and processes of ICM. Mobilize/sensitize communities to understand the appreciate the national policy and legal frameworks for guiding/regulating projects and how they apply in cases of disputes/conflict.
- Respondent 2: Support and advisory role to affected communities, replication of outreach and awareness/ training to local stakeholders, monitoring and reporting ICM resolution process

- Respondent 3: CSOs roles should be clarified so they don't "hijack" the voice of the complainants in the process

Does the policy processes ensure sufficient transparency?

- Respondent 1: YES
- Respondent 2:
- Respondent 3: Yes it does but should the Panel have its own website?

How can the mechanism contribute to continuous learning and improvement?

- Respondent 1: Focus on internal: ICM Vs DFIs ...sharing lessons and experiences
- Respondent 2: A periodic stakeholders engagement to assess the progress and the challenges of the mechanism. Conduct research studies to understand various social and environmental impacts potentially linked to IDF

Is the policy clear on what clients could expect from ICM processes?

- Respondent 1: YES
- Respondent 2: Yes

Do you see opportunities and/or constraints which are relevant to the processes in the policy?

- Respondent 1: Policy application to subcontractors not explicit
- Respondent 2: Yes



Title: Independent Complaints Mechanism Public Consultation on the Draft Policy – Stakeholder Feedback Report
Published: 1 March 2026

Authors/Organizations: DEG, FMO, & Proparco

Contact: presse@deginvest.de, info@FMO.nl, proparco@proparco.fr

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