SPECIAL PROCEDURES
UNITED NATIONS
HUMAN RIGHTS COUNCIL

PALAIS DES NATIONS • 1211 GENEVA 10, SWITZERLAND
www.ohchr.org • Tel: +41 22 917 9000 • Fax: +41 22 917 9008 • E-mail: ohchr-registry@un.org

ANNEX III: overview of compliance cases before international financial institutions on renewables and transition minerals

To the report of the Special Rapporteur on the promotion and protection of human rights in the context of climate change, Elisa Morgera, titled 'A human rights-based approach to the energy transition (A/80/188)

ANNEX III: OVERVIEW OF COMPLIANCE CASES BEFORE INTERNATIONAL FINANCIAL INSTITUTIONS ON RENEWABLES AND TRANSITION MINERALS

This Annex provides an overview of complaints submitted to the World Bank, United Nations Development Programme, Green Climate Fund, African Development Bank, Asian Development Bank, Inter-American Development Bank and European Investment Bank concerning projects involving renewable energy and critical minerals. It includes cases that involved a compliance appraisal, review or investigation, as well as those addressed through a dispute resolution process in relation to:

- Hydropower
- Geothermal power
- Solar power
- Wind power
- Other renewable energy projects
- Transition minerals.

Project	Case ID	Institution / Mechanism	Background	Outcome
Hydropower				
Bujagali Hydropower Project, Uganda	Case-24 (Third Power Project, Fourth Power Project, and Proposed Bujagali Hydropower Project) Date filed: 07/2001 Status: process completed in 2002.	IDA / Inspection Panel (World Bank)	Complaint concerning three hydropower projects in Uganda - the Power III Project (Owen Falls Extension), the Power IV Project and the Bujagali Hydropower Project. Request for inspection submitted by local environmental organizations and individuals who claimed failures and omissions in the design, appraisal, and implementation of these projects materially affected their rights and were likely to jeopardize their future social, cultural, and environmental security. With respect to the Bujagali Project, they raised concerns including: • Resettlement having commenced without IDA's supervision or involvement, and in the absence of an approved resettlement plan • Inadequate economic and technical analysis, including the alternative economic analysis, with the requesters claiming that Bujagali is not the least-cost effective option • Increased electricity tariffs • Negative cumulative impacts on the environment, fisheries and tourism	Compliance with certain aspects of policies on environmental assessment (protection of rare fish species; evaluation of alternatives; public disclosure and consultation) and involuntary resettlement, noting that most resettled people "ended up better off" than before relocation. Partial compliance with policies on involuntary resettlement (socioeconomic survey requirements) and economic evaluation of investment options. Non-compliance with policies and procedures on: • Environmental assessment, as no sectoral or cumulative impact assessment was prepared • Natural habitats, as IDA failed to ensure technically justified mitigation measures to protect natural habitats • Involuntary resettlement, as the Community Development Action Plan did not meet policy requirements and did not fully address impacts on the tourism industry • Disclosure of operational information, due to IDA's refusal to release a report with the economic review of the project In 2002, the Board approved a Management Action Plan in response to the Panel's investigation.

			• Lack of disclosure of information and consultation.	Note: findings for Power III and Power IV Projects are not included here
	Case-44 (Private Power Generation Project) Date filed: 05/2007 Status: process completed in 2018.		Request for inspection submitted by local organizations and individuals, raising environmental, hydrological, social, cultural, economic and financial concerns, including that: • The Project Social and Environmental Analysis did not properly address hydrological changes and their effect on power production, nor the potential impacts of climate change, which would lead to drier conditions, lower lake levels, and therefore lower power production • The electricity from the Bujagali hydropower plan was not the least-cost effective option, would not be affordable and would not meet the needs of the majority of Ugandans • There was inadequate consultation, late disclosure of the Power Purchase Agreement, use of old and inconsistent data, and failure to adequately address dam safety issues • The project would inundate Bujagali and other natural habitats, which are sites of cultural and religious significance to a large community of people, and involve the displacement and resettlement of people and families from their lands.	The Panel found the Bank in compliance with several policy provisions, including assessing project impacts on fisheries, establishing a dam safety panel, issuing land titles to project-affected people, and completing a baseline hydrologic data series. The Panel also found non-compliance with several policy provisions, including in the assessments of Project alternatives and cumulative impacts, excluding Lake Victoria from the Project's area of influence, and in the assessment of Project costs, risks and impacts on electricity tariffs. The Panel found that the Project did not meet Bank policy requirements to achieve livelihood restoration for people displaced several years ago in the first Bujagali project, and that it followed an inadequate approach to address and mitigate the flooding of a significant cultural property of high spiritual value to the Basoga people. In 2008, the Board approved a Management Action Plan in response to the Panel's investigation. It included measures to strengthen institutional capacity of the various authorities responsible for the Project; undertake social assessment and mitigation measures; follow up on programs to address vulnerable groups and sharing of project benefits; implement measures to address physical cultural resources; and carry out environmental assessment and mitigation measures. In 2018, the Bank reported that all actions under the Plan had been completed.
	RQ2007/1 (Bujagali Hydropower Project and Interconnection Project) Date filed: 05/2007 Status: case closed in 2018.	African Development Bank (AfDB) / Independent Recourse Mechanism (IRM)	Request for review submitted by local organizations and individuals, raising concerns that: • The appraisal of the Bujagali projects was based on inadequate economic analysis and assessment of hydrological risks and dam safety • The projects' resettlement and compensation plans, and treatment of environmental, cultural	IRM found instances of non-compliance with ADB policies and procedures regarding compensation and resettlement, cultural heritage, and the environment. It emphasized that this should be addressed by the Bank but concluded that, because the projects were co-financed and IRM may not have access to all relevant information agreed to by other parties, it would be inappropriate to make specific recommendations on how the Bank could

			and spiritual issues, were deficient, including their failure to recognize the Basoga people as Indigenous.	resolve the identified instances of project specific non-compliance. In response to the complaint, Management prepared and implemented a Remedial Action Plan. This was monitored to the satisfaction of IRM, and the case was closed in 2018.
	Bujagali Energy-04/Bujagali Date filed: 03/2011 Status: case closed in 2025.	IFC/MIGA / Office of the Compliance Advisor/ Ombudsman (CAO) (World Bank)	Complaint submitted by former employees involved in the construction of the power plant, expressing concerns related to: • Labor issues, specifically lack of compensation by the plant's subcontractor after they suffered injuries in the course of their work • Transparency of the compensation process and intimidation of workers requesting their benefits.	The parties agreed to resolve their concerns through a dispute resolution process. The dispute resolution process resulted in the resolution of 86 out of 93 workers' cases. In 2013, six of the remaining unresolved cases were transferred to CAO's compliance function and merged with a subsequent case (Bujagali-06) for the compliance process. CAO found that IFC was aware of labor and occupational safety and health risks before investing in the project but inadequately reviewed these issues due to a lack of expertise. Similar shortcomings were noted during project supervision, with IFC failing to allocate enough resources or specialist staff, leading to inadequate oversight of labor, health, and safety risks. CAO also found that IFC did not ensure that national workers' compensation requirements provided appropriate compensation. In 2017, IFC issued a management response to the CAO investigation on Bujagali-04 and 06. Between 2019-2025, CAO released five monitoring reports on Bujagali-04, 06, 07 and 08. It found that IFC implemented an Advisory Services program to support injured former workers (Bujagali-04 and -08 complaints), which CAO rated as Satisfactory. However, IFC's response to non-compliance regarding land compensation and unpaid wages (Bujagali-06 and -07 complaints) was deemed Unsatisfactory. As IFC did not commit to nor take further action to address these issues, CAO concluded there was no expectation of resolution and decided to close the case.
	Bujagali Energy-06/Bujagali Date filed: 04/2013 Status: case closed in 2025.		Complaint submitted by the Chairman of an informal association of former Bujagali construction workers on behalf of himself and over 300 workers at the construction camp and dam site. They cited concerns related to labor issues, specifically unpaid wages and benefits from as far back as 2008.	

	Bujagali-07/Bujagali Date filed: 02/2015 Status: case closed in 2025.		Complaint submitted by four community members residing in the Bujagali affected area on behalf of themselves and over 200 other community members. They cited concerns regarding the process of land acquisition for the construction of the transmission line and the adequacy of compensation provided for crops, buildings, amenities and loss of livelihoods.	CAO found that while IFC/MIGA correctly identified the need to apply the Sustainability Framework and IFC's Performance Standards, they did not ensure the Resettlement Action Plan for the transmission line met the requirements. Weaknesses in the Resettlement Action Plan led to challenges during project implementation, with the grievance mechanism unable to handle complaints about land acquisition. Despite systemic compensation complaints, IFC and other financiers responded in an ad hoc fashion rather than reviewing the adequacy of the Resettlement Action Plan. The required completion audit of the resettlement process was not conducted, leaving IFC without assurance that compensation met full replacement cost requirements, resulting in likely inadequate compensation for many affected households. In 2018, IFC issued a management response to the CAO investigation. Between 2019-2025, CAO released five monitoring reports on Bujagali-04, 06, 07 and 08. It deemed IFC's response as unsatisfactory.
	Bujagali Energy-08/Bujagali Date filed: 06/2017 Status: case closed in 2025.		Complaint submitted by a former employee of the former construction contractor, citing concerns related to labor health and safety, including lack of compensation for injuries suffered while employed at the project site.	CAO's compliance appraisal found the Bujagali-08 complaint to be similar in substance to the complaint in Bujagali-04. CAO determined that no investigation on this matter was merited at the time and decided to merge this case with the other Bujagali cases for the purpose of monitoring. It deemed IFC's response as satisfactory.
Ambuklao-Binga Hydroelectric Power Plants, Philippines	Ambuklao-Binga Hydroelectric Power-01/Binga Date filed: 06/2008 Status: case closed in 2010.	IFC / CAO (World Bank)	Complaint filed by members of the Ibaloi Indigenous community and residents of Sitio Binga, Barangay Tinongdan, located near the power plants regarding: • Displacement of Indigenous Peoples and deprivation of property, land and livelihoods of local communities • Access to jobs and economic opportunities for local community members.	CAO conducted an assessment and released a preliminary stakeholder report in July 2008. After a review and consultation of the report, the parties reached an agreement for a facilitated dialogue process including representatives from the Indigenous communities, the Barangay captains, municipal councilors, the provincial governor, the National Power Corporation and its privatized entity, and the SN Aboitiz company.

			Members of the Ibaloi Indigenous community were displaced over 50 years ago by development of the original hydropower project, and they alleged that their claims had not been fully settled prior to the planned privatization and rehabilitation of the power plants in 2008. The community raised three major needs, collectively defined as: • Acknowledgement/respect (of the past and cultural heritage and traditions of Indigenous Peoples), • Opportunity (socio-economic development programs) and • Security (creating a stable and productive future), including through environmental protection.	The process started with a training program to build skills and trust between the parties for interest-based negotiation and dialogue. The parties signed a final agreement in May 2009, with provisions for: • Access to land and usufruct rights for communities over communal property including village infrastructure, facilities, and some houses that were made available as a result of the privatization process • Local benefits flowing from corporate social responsibility funds and local government revenues as a result of the project • Enhanced livelihood opportunities for local people through the government watershed development and protection programs. In addition, SN Aboitiz made provision for local employment and benefits through contracts for goods and services. CAO monitored the implementation of the agreement for a 12-month period to the satisfaction of the parties.
Pando-Monte Lirio Hydroelectric Power Project, Panama	MICI-PN-2010-002 (PN-MICI001-2010) (Pando-Monte Lirio Hydroelectric Power Project) Date filed: 09/2010 Status: case closed in 2013.	Inter-American Development Bank (IDB) / Independent Consultation and Investigation Mechanism (MICI)	Request submitted by an association of 16 NGOs in Panama, raising several: • Environmental concerns, including the evaluation process related to environmental impact assessments, the siting of the plants and the use of water • Social concerns with respect to long-term concessions • Economic impacts, including impacts on agricultural projects and damage to roadways • Security concerns, given the presence of the Baru Volcano, the possibility of earthquakes and other hazards. They requested that, because the environmental impact study was not participative in nature, IDB consider their concerns before financing the Project.	MICI found that IDB's loan approval did not follow several operational policies and, while not every harm was caused by IDB's financing, compliance with environmental safeguards would have contributed to mitigate impacts. A Management Action Plan was approved, with activities at several levels, including monitoring and ensuring continuous implementation of the project's Environmental and Social Action Plan (ESAP) and Corrective Action Plan (CAP); holding consultations with stakeholders and affected parties; and collaborating with local municipalities for the development and implementation of Watershed Management Plan. The case was closed following the implementation of the Action Plan in 2013.
Santa Rita Hydropower	Real LRIF-01/Coban Date filed: 10/2014	IFC / CAO (World Bank)	Construction of the project commenced in 2013 but was quickly aborted due to project-related	CAO found that IFC's pre-investment review missed several weaknesses, including: • Incomplete environmental assessment information

Project, Guatemala	Status: open. As of June 2024, the case remains under compliance monitoring.		conflict. To date construction has not recommenced. Complaint submitted by local organizations on behalf of several communities downstream and upstream of the Santa Rita project, raising concerns regarding: • Failure to comply with IFC's Free, Prior and Informed Consent (FPIC) consultation requirements • Failure to consider concerns about potential negative impacts on local water sources and livelihoods • Violence, repression and criminalization of community leaders.	• Absence of a social impact assessment • Inadequate analysis of impacts on biodiversity, land use, drinking water, livelihoods and cultural heritage • Protection of Indigenous Peoples' human rights, particularly FPIC. CAO's investigation found that IFC did not adequately engage to address rising tensions, violent incidents, and serious environmental and social impact allegations from the community. CAO also noted that community opposition should have prompted IFC to re-evaluate the applicability of its Indigenous Peoples standards to the project. In 2017, IFC released its Management Response indicating that most potential impacts never materialized, given that the project was halted and the plant never constructed, and did not commit to any project-level actions in response to CAO's non-compliance findings. CAO's compliance monitoring has found that while IFC has strengthened internal procedures for appraising and supervising financial intermediary investments, IFC has not yet ensured that Hidro Santa Rita's residual impacts have been adequately assessed.
Lengarica Hydropower Plant, Albania	Enso Albania-01/Lengarica Date filed: 06/2015 Status: case closed in 2022.	IFC / CAO (World Bank)	Complaint filed by the Organic Agriculture Association, on behalf of two community members, regarding: • Inadequate due diligence regarding natural and critical habitats and legally protected areas • Adverse impacts on tourism-based livelihoods as a result of project construction, particularly its effect on water activities and natural landscapes with touristic and cultural appeal • Non-compliance with applicable national legislation, including regarding the project's location inside a National Park • Inadequate stakeholder engagement and disclosure of information.	CAO's compliance investigation found material deficits in IFC's pre-investment review of the project, particularly regarding alleged biodiversity impacts. However, these deficits were addressed during project implementation as additional biodiversity studies were commissioned and a biodiversity monitoring program was established. In these circumstances, CAO found that IFC's supervision has been adequate. Outstanding issues identified in CAO's investigation related to: • Disclosure of the environmental and social assessment and monitoring information • Assessment and mitigation of impacts on tourism • Alignment with the management plan for the National Park.

				In 2018, IFC issued an official response to the investigation. It contained an action plan with project-level responses, including aligning the IFC client's actions with the objectives of the National Park's management plan, engaging with the tourism community to enable the use of the canyon for recreational activities, and disclosing the project's environmental and social impact assessment. Between 2019 and 2022, CAO found that IFC's ongoing supervision of the project had only partially addressed CAO's findings. Since neither IFC proposed any further action to address CAO's investigation findings, CAO concluded that further monitoring had limited value and decided to close the compliance monitoring process for this case with a partially unsatisfactory result.
Canbalam Hydropower Project, Guatemala	CIFI-01/ Hidro Santa Cruz Date filed: 07/2015 Status: open. As of June 2024, the case remains under compliance monitoring.	IFC / CAO (World Bank)	The project was suspended shortly after construction commenced in 2012 and abandoned in 2016. Complaint submitted by community representatives regarding: • Dissemination and disclosure of project information • Lack of consultation • Impacts on Indigenous Peoples • Violence, persecution, threats and intimidation against those opposing the project. The claimants asserted that the following project impacts remained unaddressed: • Escalation of social conflict within the community • Death of one community member, injuries to two community members, and detainment of 17 community members in relation to the protests that followed the killing • Limitations to access to land and natural resources due to the construction of a perimeter fence around the project site.	CAO found that IFC's pre-investment review of the company's environmental and social management system did not adequately match the level of risk involved. Project activities began without a thorough risk assessment and the implementation of necessary mitigation measures. CAO found that IFC did not comply with its procedures for responding to serious incidents and did not take the necessary steps to ensure that the client's response aligned with the Performance Standards requirements. Despite the project being abandoned in 2016, CAO found evidence to support the complainants' claim that residual impacts still exist. IFC, being aware of these impacts during the financing period, failed to communicate with its client to ensure that these residual impacts were properly assessed, minimized, mitigated or compensated for as required, particularly during project closure. In 2020, the IFC Board approved a Management Action Plan. In 2024, CAO decided to close project-level monitoring because IFC did not commit to any project-level actions in response to CAO's findings. CAO continues to monitor four out of the five systemic commitments made by IFC.
Alto Maipo Hydropower Project, Chile	Alto Maipo-01/Cajon del Maipo Date filed: 01/2017	IFC / CAO (World Bank)	Complaint filed by two local organizations on behalf of affected communities, raising concerns regarding:	The Alto Maipo-01 and 02 complaints were merged for the purpose of the compliance investigation.

	Status: case open. As of April 2025, CAO continues to monitor the implementation of the systemic actions set out in the Management Action Plan.		• The project's environmental and social impacts, including limitations in access to water; erosion of the Maipo riverbed; acceleration of the desertification process in the area; and impacts on protected areas including glaciers, river ecology and ecosystem services • The environmental and social impact assessment (ESIA) for the project, claiming it was incomplete and did not meet national regulations • Impacts from project construction, such as noise and dust, for communities near the project • Social impacts, including a decrease in tourism and recreational activities, and the creation of divisions within the communities.	CAO found that, in relation to several issues raised by the complainants, IFC did not ensure the client's compliance with the Performance Standards requirements on: • Consultation with affected communities during the development of the cumulative impact assessment • Comprehensive project alternative analysis • Broad community support for the project. CAO also found that IFC was not in compliance with its Sustainability Policy in relation to: infiltration of groundwater during tunneling; sediment transport; biodiversity protection; air quality; noise; tourism and recreational activities; and IFC's disclosure of information. Regarding the second complaint, CAO found that IFC's supervision did not ensure that the client: • Took appropriate measures to prevent and address harassment, intimidation and/or exploitation, particularly for women, as required • Had in place a grievance mechanism for workers of the company and its contractors that was sufficient to address concerns promptly, using an understandable and transparent process. In 2021, the Board approved a Management Action Plan to respond to CAO's investigation, including project-level and systemic-level actions. In 2023, CAO confirmed that the four project-level actions had been implemented, but that these actions were considered insufficient by the complainants. In its 2025 monitoring report on systematic-level actions, CAO had not received the requested information to verify implementation on enhanced stakeholder engagement and gender-based violence, and noted ongoing gaps in relation to the Environmental and Social Review Procedures.
	Alto Maipo-02/Cajon del Maipo Date filed: 07/2017 Status: open. As of April 2025, CAO continues to monitor the implementation of the systemic actions set out in the Management Action Plan.		Complaint filed by a former worker associated with the Alto Maipo project, alleging that she was sexually harassed by a colleague while working for the company. The complainant raised concerns with regards to the appropriateness of the company's response to her reporting the harassment internally, and thus to the proper functioning of the company's internal grievance mechanism.	
	MICI-BID-CH-2017-0115 (Alto Maipo Hydroelectric Power Project) Date filed: 02/2017	IDB / MICI	Complaint filed on behalf of residents of Alto Maipo, raising concerns including: • Lack of clear information about the project impacts and lack of citizen inclusion • Water shortages • Acceleration of the desertification process of the area, damaging biodiversity and natural resources, protected areas of cultural interest,	MICI found non-compliance with certain operational policies, including inadequate evaluation of environmental and social impacts, especially women and workers. An Action Plan was developed and implemented from 2020-2022. MICI concluded that, out of 21 actions, 12 were completed, 7 were in progress, and no progress had been reported on the remaining 2.

	Status: case closed in 2022.		and economic, agricultural and tourist activities • Health effects from air and water pollution in the river basin. The National Human Rights Institution of Chile identified the project as one of 100 conflicts reportedly violating human rights.	
Barro Blanco Hydropower Project, Panama	Fortalecimiento institucional para la gestión basada en resultados del Ministerio de Relaciones Exte (SECU0004) Date filed: 08/2017 Status: case closed in 2021.	UNDP Panama / Social and Environment Compliance Unit	Complaint submitted by a Ngäbe Buglé area organization following UNDP's involvement in the development of the Barro Blanco Hydropower Project. The Indigenous Ngäbe Buglé population raised several concerns with the project, particularly regarding inadequate environmental and social impact assessment; insufficient transparency; flawed consultations with Indigenous communities and lack of valid FPIC; and inattention to the rights of protestors. After several unsuccessful attempts to resolve these concerns, key parties, including the Government and Ngäbe Buglé, initiated a dialogue process in February 2015. UNDP provided initial technical and financial support for dialogue process. The Roundtable Dialogue took place from February until May 2015. The Indigenous Commission rejected the proposal for a continued dialogue through a 'new technical roundtable,' citing disrespectful behavior (such as the continuation of efforts to build the dam) during the dialogue process. In August 2015, a new agreement was signed to begin a second dialogue process, but without all entities and individuals formerly part of the Indigenous Commission. In addition to using a different configuration of Indigenous representatives, the subsequent dialogue did not use the Consensual Methodology previously agreed by all. The 'Joint Technical Team' first	It was found that the UNDP Panama Country Office did not meet UNDP requirements to screen projects and programs in accordance with environmental and social screening procedures. UNDP did not prepare a stakeholder analysis and stakeholder engagement plan prior to the Roundtable Dialogue, as required for UNDP engagements with Indigenous Peoples. UNDP did not meet requirements related to due diligence, transparency, consultation/ consent and respect for the rights of Indigenous Peoples, after the Roundtable Dialogue was concluded. When the subsequent dialogues did not use the methodology previously agreed, the UNDP Panama Country Office did not seek to create a new methodology agreed to by all, and did not perform an assessment of social or human rights-related risks related to the new dialogue. UNDP did not perform the required analyses needed to fully understand risks associated with UNDP facilitating the second dialogue process, and did not adopt required measures to respond to these risks, including measures to ensure transparency and respect for the rights of directly affected communities. It was recommended that the UNDP Country Office should explore actions it could take to help ensure respect for UNDRIP and related findings of the UN Special Rapporteur on the rights of Indigenous Peoples.

			met in September 2015 and completed its work in January 2016.	
Generadora San Mateo and Generadora San Andrés Hydroelectric Power Projects, Guatemala	MICI-CII-GU-2018-0136 (Generadora San Mateo S.A. and Generadora San Andrés S.A.) Date filed: 08/2018 Status: open. As of July 2024, the case remains under compliance monitoring.	IDB / MICI	Request submitted by local authorities and individuals, alleging that the projects had adverse environmental, social, security and gender-based impacts. This was mainly due to the absence of an adequate and complete assessment of the projects' environmental and social impacts and the failure to take appropriate prevention or mitigation measures. Specific complaints included: • Pollution of water sources • Potential harm to livelihoods • Threats to local biodiversity • Disproportionate impacts on women due to the absence of a gender perspective in both projects • Security risks in the context of prevailing public-order issues in the region • Violence and reprisals against those opposing the projects • Harm to the traditional culture of Indigenous Peoples, particularly through damage to sacred and archaeological sites near the projects.	MICI found that IDB failed to comply with its Sustainability Policy regarding: • The identification of the affected population as Indigenous • Gender-differentiated impacts • Requirements on meaningful consultations, community participation, project information disclosure mechanisms and the grievance mechanism • Impacts on social cohesion, violence and security • Certain impacts on cultural heritage • Certain environmental impacts of the project • Cumulative impact assessments • The environmental and social categorization of the project. A Management Action Plan was approved in response to these findings, which MICI continues to monitor. As of July 2024, 18 out of 20 planned measures have been implemented.
Nachtigal Hydropower Plant, Cameroon	Cameroon: Nachtigal Hydropower Co-01 Date filed: 05/2022 Status: open. As of June 2024, the case remains in dispute resolution monitoring.	IFC / CAO (World Bank)	Complaints filed by a coalition of Cameroonian civil society organizations on behalf of communities and socio-professional bodies impacted by the project. They raised concerns including: • Insufficient stakeholder consultations and lack of FPIC • Loss of income for fisherfolk, sand miners and fishmongers • Untimely and inadequate compensation for land and crops • Inadequate resettlement measures in relation to both physical and economic displacement • Destruction of sacred sites	IRM (African Development Bank) and CAO (MIGA/IFC) agreed to co-manage a single dispute resolution process between the Parties. In May 2024, the Parties reached and signed a confidential agreement. Based on this agreement, the Inspection Panel (IBRD/IDA) issued a memorandum closing the case and took no further action. The Outcome Report states that the final Agreement included provisions related to livelihood restoration and supplementary support; collective community livelihood restoration benefits; promotion of cultural heritage; measures related to support for pupils and students, training and employment; opportunities for local service providers; and health and environmental projects.
	RQ2022/03 (Nachtigal Hydropower Project) Date filed: 05/2022 Status: open. As of June 2024, the case	AfDB / IRM		

	remains in dispute resolution monitoring.		• Increased social problems (theft, juvenile delinquency, gender-based violence, commercial sex work, diseases) • Adverse environmental impacts (deforestation, increased greenhouse gas emissions and pollution, reduced rain) • Loss of medicinal plants and water resources used for healing and rituals • Inadequate grievance mechanisms.	The Parties requested the three accountability mechanisms to monitor the implementation of the Agreement.
	Case-158 (Nachtigal Hydropower Project and Hydropower Development on the Sanaga River Technical Assistance Project) Date filed: 06/2022 Status: process completed in 2024.	IBRD/IDA / Inspection Panel (World Bank)		
Tanahu Hydropower Project, Nepal	CRP Request 2025/1: Nepal: Tanahu Hydropower Project Date filed: 01/2025 Status: open. As of April 2025, the case remains under compliance review.	Asian Development Bank (ADB) / Accountability Mechanism	Two complaints submitted by individuals, raising concerns including: • The construction of a crusher opposite to a school, causing disturbances to the learning environment • Excavation altering the river course • The construction of a retaining wall without the consent of stakeholders, which reversed water back to settlements • The construction of unreliable retaining walls, posing more threats to the settlement • Recurring flooding and risks. The most recent Environmental and Social Monitoring Report for the Project (Eighth Panel of Experts' Report), released in August 2025, determined that "work on social safeguards for the THP is progressing well." Nonetheless, it included several recommendations that have bearing on compliance with social safeguards, including regarding the stakeholder engagement plan; grievance redress mechanism; local consultative forum; compensation for affected land; construction-related damages; Resettlement and Indigenous Peoples Plan; Livelihood Restoration Program; replacement of community assets; and public safety awareness campaign.	The case was found eligible for a compliance review in April 2025. The investigation, which is ongoing, will review ADB's compliance with its operational policies and procedures in the following areas: flood-related environmental and social risks and impacts; assessments and impacts of the crusher plant; consultation and information disclosure; grievance redress; and monitoring and supervision.

Geothermal				
Kenya Electricity Expansion Project, Kenya	Case-97 (Electricity Expansion Project) Date filed: 10/2014 Status: process completed in 2020.	IDA / Inspection Panel (World Bank) (Note that a related complaint was also submitted to the European Investment Bank)	Complaint filed by Indigenous Maasai communities living within the Hell's Gate National Park in the Rift Valley in Kenya. The same complaint was filed with the European Investment Bank (EIB) Complaints Mechanism. Due to their proximity to the geothermal plant, four Maasai villages were resettled. The Requesters claimed that the community had agreed to resettle on the condition that it would receive a communal land title, which had not yet been obtained. They asserted that the resettlement adversely affected them and, instead of restoring or uplifting their livelihoods, led to impoverishment and social tensions. Many were resettled far from their previous sources of income. The Requesters raised concerns about the cultural compatibility of the resettlement housing, health impacts due to new drilling in the vicinity of the resettlement site, and fear of future relocation. They also claimed that 14 families were excluded from receiving houses at the resettlement site, including them poor families, orphans and widows. The Requesters lacked trust in their community representatives and the Bank, and complained about inadequate consultation and participation, corruption, nepotism and discrimination.	The Panel found non-compliance with Bank policies related to Indigenous Peoples and Involuntary Resettlement, and inadequate supervision by the Bank, noting that some of the most vulnerable people experienced harms during the resettlement process. The Panel highlighted the need for: • Adequate screening for the presence of Indigenous Peoples in project areas • Greater attention to the traditional authority structures of affected communities and their local languages • A choice of housing options that may be better suited culturally and economically to different project-affected persons • Livelihood restoration and benefit-sharing schemes • Monitoring of socioeconomic impacts of the project on the most vulnerable Given that EIB had initiated a mediation process to help resolve the identified issues, the Panel proposed to participate in the mediation process, instead of undertaking consultations on remedial actions in parallel. The mediation was completed with a signed agreement in 2016. In 2017, the Board approved a Management Action Plan to address the Panel's findings, based on the mediation agreement. The plan was monitored until full implementation.
Solar power				
Baynouna Solar Power Plant, Jordan	Masdar Baynouna-01/East Amman Date filed: 02/2020 Status: case open. As of April 2025, CAO will monitor the implementation of the	IFC / CAO (World Bank)	Complaint filed nine months before the plant became operational by 66 members of the Al Balqa tribes, some of whom are itinerant herders, stating that the project land belongs to their tribes, whose members have used the site for hundreds of years to cultivate barley for fodder and graze livestock. As the land's customary owners and users, they claimed that IFC and the client improperly	CAO found that IFC's Environmental and Social due diligence was not commensurate with the project's scale. Despite evidence of land use by herders, IFC did not collect the necessary social baseline data, assess land use and traditional rights, or consult with affected communities, some of which were not identified as stakeholders and were not consulted. During supervision, IFC did not ensure that its client developed a Stakeholder Engagement Plan or effectively

	Management Action Plan.		excluded them from project-related stakeholder engagement. They also alleged that their land rights were violated, resulting in the loss of livelihoods, assets and access to land and natural resources, and that Baynouna failed to provide them with project-related development benefits and opportunities.	addressed grievances. As a result, herders faced harm related to economic displacement without proper compensation or livelihood restoration and lost access to traditionally owned land. In 2025, the Board approved a Management Action Plan, including the development of a social impact assessment by Baynouna Company to provide conclusive information on project-affected people and, as needed, identify adequate and feasible mitigation measures aligned with applicable Performance Standard requirements. Additionally, IFC also updated its Environmental and Social Review Procedure in 2025.
Benban Solar Park, Egypt	RQ 2022/04 (Benben PhotoVoltaic Solar Park) Date filed: 09/2022 Status: open. As of May 2023, the case remains under investigation.	AfDB / IRM	Complaint filed by 62 security agents working for the SWAT company operating in the Benban Solar Park, alleging: • Poor working environment and unreasonable labor conditions • Inadequate salaries • Insufficient food and transportation allowances • Occupational health and safety risks • Incidences of bullying and retaliation • Unresponsive grievance mechanisms.	In May 2023, IRM determined that a compliance investigation was warranted.
	GCF-EBRD Egypt Renewable Energy Financing Framework (C0009) Date filed: 09/2022 Status: open. As of September 2025, the case remains under investigation.	Green Climate Fund – EBRD / Independent Redress Mechanism (IRM)	Two complaints submitted by former employees of the company Health and Safety Home, working at various projects in the Benban Solar Park. They raised concerns regarding working conditions and labor management issues, including: • Quality of food provided • Differential treatment of employees in terms of salary, benefits and promotions • Prevention of access to grievance mechanism • Retaliation for filing complaints.	IRM will proceed on the basis of a single compliance investigation. The Compliance Investigation phase will conclude by 15 December 2025.
Wind power				
Zarafshan Wind Power	Zarafshan-01 Date filed: 07/2023	IFC / CAO (World Bank)	The land occupied is owned by the government and seasonally used by farmers and herders for grazing of sheep, goat, and horses.	CAO facilitated bilateral meetings between January and March 2024. The parties signed a confidential agreement on 20 March 2024.

Plant, Uzbekistan	Status: case closed in 2025.		Complaint filed by a herder concerning: • The use of heavy machinery by the project, which resulted in oil/waste spilling onto his land • Fines imposed on him by government authorities for the oil spill • Dust dispersed by the turbines, making it impossible for animals to feed and graze in the area • Threats to animal health/livestock caused by unfenced trenches • Economic losses due the death of eighteen sheep and one horse.	CAO monitored the implementation of the agreement until 31 December 2024, to the satisfaction of both parties.
	Zarafshan-04 Date filed: 03/2024 Status: open. As of September 2024, the case remains in dispute resolution.		Complaints filed by CEE Bankwatch Network on behalf of confidential complainants, raising concerns about: • Improper turbine placement near threatened bird species' nests • Disregard for a comprehensive nest survey and lack of consultation with local communities or environmental experts • Failure to assess cumulative impacts of other wind projects • Insufficient information on potential impacts and mitigation measures in the environmental and social impact assessment • Lack of due diligence.	With the consent of all the stakeholders and parties, CAO and the Office of the Special Project Facilitator agreed in principle to conduct a joint mediation process. In September 2024, CAO issued its assessment report. The parties agreed to participate in a CAO dispute resolution process, which is ongoing. OSPF reviewed several issues raised in the complaint. The purpose of the review was to determine whether further problem-solving would be useful. The review was based on information gathered during the OSPF site visits, interactions with the borrower and ADB project team, the borrower's response to CAO on the issues raised in the complaint, and the CAO Assessment Report dated September 2024. In November 2024, OSPF determined that "no further problem-solving efforts will be useful."
	SPF-2024-11-01-0171 (Zarafshan Wind Power Project) Date filed: 03/2024 Status: case closed in 2024.	ADB / Accountability Mechanism		
Mareña Renovables Wind Project, Mexico	MICI-ME-2012-053 (ME-MICI002-2012) (Mareña Renovables Wind Project) Date filed: 01/2013 Status: case closed in 2018.	IDB / MICI	Request submitted on behalf of Indigenous communities impacted by the project, raising concerns of: • Environmental harm, particularly to maritime fauna and migratory birds • Actual and potential harm to the lifestyle of Indigenous communities and to their traditional livelihood of fishing The Request stated that the harm was caused by:	MICI found instances of non-compliance with policies on environmental safeguards, access to information, and Indigenous Peoples. The Board of Executive Directors requested changes to bring the institutional and regulatory framework for projects involving Indigenous communities into line with international best practices. It also urged the Bank to strengthen its institutional capacity to measure social risks and operate in contexts of social conflict.

			• Lack of adequate public consultation and shortcomings in the evaluation of potential harm • Insufficient information-sharing with the communities about the potential impacts • The Bank's failure to request an evaluation of the adverse effects on the Indigenous communities and its failure to consider the same communities as potential beneficiaries of the Project to be developed on their lands.	In response to the investigation, Bank Management devised an Action Plan to address these recommendations, which was implemented by August 2018.
Other renewable energy projects				
Tacuarembó-Salto Green Transmission Line, Uruguay	MICI-CII-UR-2022-0199 (Tacuarembó-Salto Green Transmission Line - Request II) Date filed: 11/022 Status: open. As of May 2025, Management is developing an Action Plan.	IDB / MICI	The construction of a transmission line to enable increased integration of renewable energy into the national grid raised concerns that: • The area (their property) was not properly identified as a critical cultural site • Neither an adequate impact assessment nor an analysis of alternatives to protect the historic value of the site was carried out • The consultation process was inadequate, as they were not informed or consulted on the Project's route until it was already well underway, limiting their participation.	MICI found instances of compliance and non-compliance in three areas: consultation and informed participation processes; identification, assessment, and mitigation of potential impacts on cultural heritage; and adequate supervision of the implementation of mitigation measures. It included five recommendations for IDB to strengthen its institutional processes in these areas. In May 2025, the Board of Executive Directors requested that Management, within 120 days and in consultation with MICI, develop an action plan to implement the recommendations made by the Mechanism. Once approved, MICI will monitor the implementation of the Action Plan.
Transition minerals				
Agata Nickel Project and Tapian Extension, Philippines	Mindoro Resources-01/Jabonga Date filed: 09/2011 Status: case closed in 2012.	IFC / CAO (World Bank)	Complaint filed by two Indigenous communities living in Dinarawan and Bunga, within the Tapian Extension, raising concerns about: • IFC failing to acknowledge Indigenous Peoples affected by the project • The extent and quality of consultations prior to exploration activities in ancestral lands • Exploration activities in contested areas without FPIC • Undue commercial influence by the mining company on the FPIC process	CAO found indications of shortcomings regarding requirements to ensure that: the project's area of influence was appropriate defined at the time of the environmental and social review; the project was assigned the appropriate IFC environmental and social category; and the project was adequately supervised. However, it found that the immediate risk of adverse outcomes was mitigated by company's decision to suspend exploration in the contested area. Regarding the longer-term risk, CAO considered it positive that IFC negotiated covenants in its 2012 subscription agreement that prevent the company from proceeding with

			• Potential social and environmental impacts of future mining activities in the contested areas.	operations in the contested area absent a waiver from IFC. Appropriately supervised, CAO found that these covenants provide IFC with an improved basis to ensure that any future operations are conducted in accordance with Performance Standards on Indigenous Peoples and cultural heritage. CAO acknowledged that the complainants were aggrieved by what they perceived as past wrongs and an ongoing lack of respect for their community by the company, and that these points of grievance remain unaddressed.
Quellaveco Large-Scale Copper Mining, Peru	Quellaveco Mining-01/Moquegua Date filed: 11/2011 Status: case closed in 2017.	IFC / CAO (World Bank)	Complaint filed by a local environmental NGO, raising concerns regarding: • Impacts to water quality and quantity in an arid area characterized by rising competition over water sources • The proposed handling of toxic wastes and the impact this could have on communities' health • Land claims on the project sites • Inadequate community engagement, including lack of consultation on the initial and modified environmental impact assessment.	CAO found that IFC's investment agreement with the company omitted IFC's environmental and social requirements, making supervision difficult. While IFC supervised the project with reference to evolving environmental and social standards, key issues identified were not translated into corrective action plans: • Resettlement • Impact of land acquisition on Indigenous Peoples • Stakeholder engagement • Project design and environmental impact assessment. CAO found that: • The project should have been categorized as a higher environmental and social risk • IFC's procedures for processing human rights issues were inconsistent with its commitments under the Sustainability Framework • There was no evidence that IFC's divestment decision was based on the required analysis of whether the investment's purpose had been "substantially fulfilled," including environmental and social achievements and risks. CAO monitored IFC's actions in response to the investigation findings until 2017, concluding that IFC's response did not substantially address the findings. Nevertheless, CAO closed its monitoring given the time that has passed since IFC's divestment and its decision not to engage in a project-level response with its former client or affected communities.
Dairi Mineral Prima Zinc	Financial Intermediary-01	IFC / CAO (World Bank)	Complaint filed by two local residents on behalf of other community members living in the	CAO concluded that that the complaint met the three criteria for a compliance investigation: there were

and Lead Project, Indonesia	Date filed: 10/2019 Status: case closed in 2022.		vicinity of the project, supported by several organizations, raising concerns including: • Risks related to the potential failure of the mine's tailings dam, with potential loss of life, livelihoods and land • Risks of water contamination from the tailings dam • Failure to adequately engage stakeholders and disclose information • Threats against residents opposing the project • Failure to recognize Indigenous Peoples and consult with them • Safety risks from an explosive storage facility near a settlement • Air pollution risks • Social risks related to in-migration of workers • Increased road traffic.	preliminary indications of harm or potential harm; there were preliminary indications that IFC/MIGA may not have complied with its Environmental and Social Policies in exercising its responsibilities concerning its investment; and that the alleged harm was plausibly linked to IFC/MIGA's potential non-compliance in relation to: • Assessment and management of environmental and social risks and impacts • Resource efficiency and pollution prevention • Community health, safety and security • Biodiversity conservation and sustainable management of living natural resources • Indigenous Peoples. However, CAO decided not to initiate a compliance investigation, as IFC had exited from investments. In these circumstances, CAO found that an investigation would not provide particular value in terms of accountability, learning or remedial action despite an IFC exit.
Technical Cooperation for the Governance of Lithium Resources in the Province of Jujuy, Argentina	MICI-BID-AR-2025-0244 (Strengthening the Technical, Environmental, and Social Capacities for the Governance of Lithium Resources in the Province of Jujuy, Argentina) Date filed: 03/2025 Status: open. As of August 2025, the case remains in dispute resolution.	IDB / MICI	Request filed by representatives from over 30 Indigenous communities in the Jujuy province, alleging that their living conditions had been impacted by the lack of access to information, inclusion and effective participation in the process of developing the Bank-financed technical cooperation operation. Specifically, the Group of Requesters says it was excluded from the stakeholder mapping to identify the communities and groups that the operation sought to engage in such process.	MICI's assessment report concluded that the necessary conditions existed to initiate a dialogue between IDB and the requesters. In August 2025, the dialogue stage began. The deadline to conclude this process is August 6, 2026.