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President's Bulletin

Distribution: All staff members

Subject: IFAD Complaints Procedure for Alleged Non-Compliance with its Social and Environmental Policies and Mandatory Aspects of its Social, Environmental and Climate Assessment Procedures (SECAP)

Introduction

1. IFAD-funded projects and programmes are designed in a participatory process thus taking into account the concerns of all stakeholders. IFAD works to ensure that all IFAD investments are implemented in accordance with the Fund's policies, standards and safeguards. IFAD considers it equally important that parties adversely or potentially adversely affected by IFAD-funded projects and programmes should be able to bring issues to the Fund's attention.
2. During the project/programme design and implementation process IFAD will inform stakeholders of its Social, Environmental and Climate Assessment Procedures as well as of the Complaints Procedure in force. To this end, IFAD will ensure that stakeholders are aware that they can contact IFAD directly and file a complaint if they believe that they are, or will be, adversely affected by an IFAD-funded project/programme and that the Lead Agency is not responsive to their concerns.
3. The purpose of this bulletin is to outline the IFAD Complaints Procedure for alleged non-compliance with its social and environmental policies and mandatory aspects of its Social, Environmental and Climate Assessment Procedures (SECAP). This procedure will be reflected in section 446 of the IFAD Manual and will come into effect as soon as SECAP comes into force.
4. The IFAD website will provide a summary of the steps involved and guidance on how to report issues. The website will also include all policies that apply to the design and implementation of projects and programmes financed by the Fund.

Eligibility

5. For complaints to be considered, the following criteria must be met:
 - The complainants allege that IFAD has failed to implement its social and environmental policies and/or the mandatory provisions set out in SECAP.
 - The complainants allege that they have been or will be adversely affected as a result of such non-compliance.

- The complaints must be submitted by at least two people who are both nationals of the country concerned and/or residing in the project area. Complaints from foreign entities or anonymous complaints will not be considered.
- Complaints must concern projects/programmes currently under design or implementation. Complaints concerning closed projects, or those that are more than 95 per cent disbursed, will not be considered.
- Complaints should not be accusations of fraudulent or corrupt activities in relation to project funds – these are dealt with through the existing procedures in [PB 2007/02](#) – see <http://www.ifad.org/governance/anticorruption/how.htm>

The Process

6. The complainants should first bring the matter to the attention of the government or non-government entity responsible for planning or executing the project/programme (the Lead Agency), or to any other government entity with responsibility for oversight of the Lead Agency. If the Lead Agency or other entity does not respond in a satisfactory manner, the matter may be brought to the attention of IFAD. Matters may also be brought directly to the attention of IFAD in cases where the persons raising the issue feel that they might be subject to retaliation if they were to approach the Lead Agency or other government agency directly.
7. Anyone who wishes to bring such a matter to the attention of IFAD may send an email to SECAPcomplaints@ifad.org. This address will be monitored by the Front Office of the Programme Management Department (PMD), and emails received will be referred to the responsible Division Director and Country Programme Manager (CPM).
8. When a matter is referred to the Regional Division, the Division will examine it and, where necessary, will contact the government or non-government entity responsible for planning or executing the project/programme (the Lead Agency), or any other government entity with responsibility for oversight of the Lead Agency, to determine whether the complaints are justified. In determining the justification, the Division will need full access to project personnel, documentation and records of the Lead Agency. The Division may also need to conduct site visits. If the complainants request that their identities be protected, their identities will not be disclosed to the Lead Agency or anyone else in the Borrower/Recipient's government.
9. If the Regional Division finds that the complaint is not justified, the complainants will be informed of such decision through a letter prepared by the Regional Division.
10. If the Regional Division finds that the complaint is justified and that there is evidence of actual or likely harm as a result of IFAD's failure to follow its own policies and procedures, it will take action to ensure that necessary changes are made to the project/programme that is being proposed or is under consideration, or that the Borrower/Recipient complies with its obligations under the Financing Agreement¹, as required. Response actions will focus on bringing the project/programme into compliance and no monetary damages will be available or paid for in response to such complaints. The complainants will be informed of the resolution of the issue through a letter from the relevant Regional Division.
11. In all cases the complainants will be informed that, if they disagree with IFAD's response, they may submit a request to SECAPcomplaints@ifad.org and that an impartial review be carried out by the Office of the Vice-President. The PMD Front Office will refer such requests to the


¹ IFAD's financing is extended through Financing Agreements, which require the Borrower/Recipient of the financing to adhere to various policies and impose certain conditions. These are publicly disclosed at the time of approval of the project or programme by the Fund's Executive Board.

Office of the Vice-President, which shall review each request and determine whether IFAD's response was adequate.

12. The Office of the Vice-President shall decide on the steps to be taken to examine such complaints, which may include, if necessary, contracting external experts to review the matter. The Office of the Vice-President may make recommendations for PMD to respond further to the complaint, and it may also include general recommendations for changes to IFAD's policies and procedures. The review prepared by the Office of the Vice-President shall be sent to the Associate Vice-President of PMD with a copy to the President. The complainants shall be informed of the results of this review through a letter signed by the Vice-President. If the complainants ask that their identity be protected, the Office of the Vice-President will ensure that this is done.
13. This Complaints Procedure will come into effect with the new Social, Environmental, and Climate Assessment Procedures on 1 January 2015.

Reporting

14. PMD's Regional Divisions will communicate their responses to complaints to the Associate Vice-President of PMD, copying in SECAPcomplaints@ifad.org for record-keeping purposes. The Office of the Vice-President, with assistance from the PMD Front Office, will maintain a record of all complaints received, and prepare an annual report listing complaints received during the previous year and summarizing the actions which have been taken to address them. A summary of this report will be included in IFAD's Annual Report.



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