

A guide to the ADB Accountability Mechanism (ADB-AM)

If the Asian Development Bank (ADB) funded or supported the project that is causing you harm, you may be able to file a complaint with their accountability mechanism, the ADB Accountability Mechanism (ADB-AM).

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▶ Understanding the ADB and ADB-AM

WHAT IS THE ADB?

The [Asian Development Bank \(ADB\)](#) is a regional, multilateral development bank that is made up of 69 member countries, 49 from Asia and 20 from outside of Asia. It is headquartered in Manila, Philippines.

The ADB's mission is to alleviate poverty in Asia and the Pacific through loans, technical assistance, grants, guarantees and investments intended to create economic growth.

WHAT IS THE ADB-AM?

The ADB has an independent accountability mechanism: the [Accountability Mechanism \(ADB-AM\)](#). The ADB-AM was established in 2003, a restructure of the ADB's original accountability mechanism, the Inspection Function, which was established in 1995. The ADB-AM's dispute resolution (or problem-solving) function is led by the Special Project Facilitator (SPF), and its compliance review function is led by the Compliance Review Panel (CRP).

The ADB-AM receives complaints related to the environmental and social impacts of ADB-supported projects. **If you are affected by an ADB-supported project, you can file a complaint with the ADB-AM.**

! The ADB-AM has two separate functions to try to resolve the complaint: dispute resolution and compliance review. As a complainant, you will be asked - at the time of filing - to decide whether you want to pursue dispute resolution, compliance review, or both in sequence. If you choose both, dispute resolution will take place first.

Unlike some other accountability mechanisms, the ADB-AM does not conduct a single, centralized eligibility screening at the outset. Instead, your complaint is forwarded by the ADB-AM directly to the process you selected, and eligibility is assessed separately by either the SPF for [dispute resolution](#), or the CRP for [compliance review](#). Each arm of the mechanism has its own criteria and process for determining whether a complaint is eligible to proceed. You can learn more about these two processes below and consider which might best suit your goals.

DISPUTE RESOLUTION

The ADB-AM's voluntary Dispute Resolution process, also referred to as "problem-solving", aims to resolve issues collaboratively. At the ADB-AM, this phase is facilitated by the Special Project Facilitator (SPF). The SPF facilitates dialogue, negotiation, and joint fact-finding between the affected communities and the project promoter to reach a mutually acceptable solution.

Dispute Resolution is a flexible process and depends on the willingness of all parties to participate. If an agreement is reached, the SPF will formalize it and monitor its implementation. If the process fails, the complaint may proceed to Compliance Review.

You can learn more about this phase below.

COMPLIANCE REVIEW

The Compliance Review process at the ADB-AM is conducted by the Compliance Review Panel (CRP), and focuses on assessing whether the ADB has complied with its policies, including its environmental and social standards.

During this phase, the CRP investigates whether any non-compliance by the ADB contributed to the harm alleged in the complaint. The findings are compiled in a Compliance Report, which may include recommendations for corrective actions.

ADB Management is required to respond to the report and propose actions to address the findings. The CRP then monitors the implementation of these actions.

You can learn more about this phase below.

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CAN YOU COMPLAIN TO THE ADB-AM?

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

Project: Is the project supported by the ADB?

The ADB-AM accepts complaints about ADB-supported projects under the following conditions:

- The project must be financed, supported, or administered by the ADB (or proposed to be).
- The complaint must be filed within **two years** of the loan or grant closing date. The ADB-AM does not require the ADB to have an ongoing financial interest in the project at the time of the complaint.

Tip: You can check a project's status and closing date on the [ADB's project page](#), via an [Access to Information](#) request, or contact the ADB-AM directly for help.

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

The ADB-AM accepts complaints from:

- Two or more individuals, or an entire community, who are experiencing (or at risk of experiencing) harm as a result of an ADB-supported project. This harm must be **material** and **direct**, meaning that it affects them in a concrete, personal way. Complaints from individuals or groups that are not directly affected, or who cannot clearly demonstrate the link between the project and the harm, may be found ineligible. In some cases, such as biodiversity loss or climate change, you can argue that the harm affects everyone.
- Authorized representatives can file a complaint on behalf of affected individuals or communities. If a local representative cannot be found, a non-local representative may file a complaint with prior approval from the ADB-AM.

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

Harm: Is the harm related to environmental or social impacts?

The ADB-AM considers complaints related to:

- Direct or material environmental or social harm,
- Caused by, or is likely to be caused by, ADB-financed project, and
- Resulting from non-compliance with ADB's operational policies and procedures, such as its Safeguard Policy Statement or Access to Information Policy (only required for the compliance review function).

Attempted resolution: Have you tried addressing the issue?



The ADB-AM requires complainants to make **“good faith efforts”** to resolve the issue with the ADB before filing a complaint. Although it does not require it, the ADB-AM also encourages complainants to first address their problems with the project-level grievance redress mechanisms, to facilitate prompt problem solving on the ground.

It is critical that you provide **evidence of your efforts** to raise the issue with the ADB (and company staff if you have reached out to them), e.g. copies of any correspondence (even if they are unanswered), meeting notes, or responses you received (if any).

If you fear retaliation, the ADB-AM has advised that you do not have to communicate with the ADB before filing your complaint. In this case, clearly explain the safety risks you are facing in your complaint.

What counts as “good faith efforts” to resolve the issue?

Before the ADB-AM can consider your complaint, it must decide whether you made **“reasonable”** efforts to resolve the problem directly with the ADB before filing the complaint. This is often referred to as the “good faith” requirement.

ADB Management often argues that complaints are ineligible because complainants failed to meet this requirement - even in cases where ADB Management itself has not responded. To strengthen your case and reduce risk of dismissal on these grounds, it is **important** to document your outreach carefully and explain any obstacles you faced in attempting to engage with the ADB.

While the ADB-AM does not offer a strict checklist of what counts as “reasonable” efforts, based on past cases and our own experience, we recommend the following:

- **Direct communication with a full-time ADB staff member:** You must make a serious attempt to contact the ADB itself - not just the project company, contractors, consultants, courts, government agencies, or national grievance mechanisms. We recommend that you contact the **Responsible ADB Project Officer, whose name can be found on the ADB's project page**, or through the Access to Information process. Some email addresses for senior staff can be found on the [ADB's website](#). If you cannot find the email address for the responsible project officer, or if you are unsure who to email, you can email the staff we have listed below.
 - To remove any doubt that you have contacted the ADB, you should also copy the following ADB staff in your email or letter:
 - Scott Morris (Vice-President) (if the project is located in East and Southeast Asia, and the Pacific) smorris@adb.org;
 - Yingming Yang (Vice-President) (if the project is located in South, Central and West Asia) yyang@adb.org;
 - Nianshan Zhang (Head of Safeguards) zhangnianshan@adb.org; and
 - ADB Civil Society team civilsociety@adb.org.
- **Follow-up if you don't get a response:** If your initial message does not receive a response, we recommend that you follow up at least once and keep a record of your attempts. Although this is not strictly required by the ADB-AM's policy, it helps demonstrate that you have made genuine efforts to engage.
- **Allow a reasonable time for ADB to respond:** The ADB-AM expects that complainants give the ADB a “reasonable opportunity to respond” before concluding that outreach efforts have failed. We suggest waiting at least one month for a response before filing your complaint. If your complaint is urgent, you can file a complaint sooner, but make sure to explain the urgency in your complaint.
- **Raise the same issues with ADB that you will raise in your complaint:** Try to include all of your concerns in your correspondence with the ADB that you plan to raise with the ADB-AM. If you raise additional concerns in your complaint that were not part of your previous outreach to the ADB, the ADB-AM may decide that you have not met the “good faith” requirement for those new issues.

- **Note any barriers you faced in contacting the ADB:** If circumstances made it difficult for you to contact the ADB, please explain those in your complaint. The ADB-AM can consider such barriers when deciding whether your efforts were “reasonable”. Examples of barriers include:
 - Limited access to the internet/WiFi or phone access
 - Long distances from the nearest ADB office
 - Any language or literacy challenge
 - Any safety risks or fear of retaliation
- **You can skip direct engagement in cases of safety risks or fear of retaliation:** The ADB-AM has indicated that if you fear engaging with the ADB could lead to retaliation or endanger you or your community's safety, you may proceed straight to filing a complaint to the ADB-AM. In this case, clearly explain these risks in your complaint.
- **Efforts at other levels may still support your case:** While the project-level grievance redress mechanism (GRM) is not a substitute for engaging with the ADB directly, using the GRM may still be helpful in demonstrating your overall efforts to resolve the issues. If your experience with the GRM was negative or ineffective, we recommend that you include this information in your complaint. It can help explain why you are now turning to the ADB-AM.
- **Still have questions?** If you have any questions or concerns about satisfying this “good faith” requirement, you are welcome to reach out to us for advice at advice@accountabilitycounsel.org.

✉ MODEL COMPLAINT LETTER

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

📄 Download complaint letter

COMPLAINT FILING CHECKLIST

📄 Download checklist

- ☐ **Format:** Complaints can be submitted in writing via letter, email or the online form available on the ADB-AM website. Complaints must be submitted in English or any of the official or national languages of ADB developing member countries.
- ☐ **Complainant details:** Your complaint should include the name of each person or organization filing the complaint, contact details for key community representatives. If you have a representative, include signed written authorization providing authority for the representative to represent you.
- ☐ **Project details:** Provide the name and location of the ADB-supported project, along with any additional details (e.g. sector, company name, or project name). You can find information about projects on the [ADB Project Page](#) or through the [DeBIT tool](#) or [Early Warning System](#) (databases you can search).


- ☐ **Description of harm:** Explain the harm you are experiencing or anticipate, supported by facts and evidence.
- ☐ **Evidence of attempted resolution:** Provide evidence showing your “good faith efforts” to resolve the issue with ADB (mandatory) and the project-level grievance redress mechanism (optional). If you did not attempt resolution, explain why (e.g. for risk of retaliation).
- ☐ **Choice of function:** Indicate whether you prefer dispute resolution (known as problem-solving at the ADB), compliance review or both.
- ☐ **Confidentiality:** Indicate if you require confidentiality due to fear of reprisals or for other reasons. Clearly describe the risks you face and provide reasons for your request.
- ☐ **Optional:**
Including the following can strengthen your complaint:
 - References to specific ADB policies or guidelines that were not followed.
 - Your preferred outcomes or remedy.
 - Additional supporting material: maps, photos, media reports, copies of communications (even if they are unanswered) etc.
 - Your preferred communication method (e.g. email or post).
 - Any concerns about risks of retaliation or security issues.

STRENGTHEN YOUR COMPLAINT BY REFERENCING ADB POLICIES

When filing your complaint to ADB-AM, you may strengthen your complaint by referencing specific ADB policies that you believe were violated. ADB’s environmental and social safeguards are designed to identify and mitigate risks associated with bank activities, with an overarching goal of preventing environmental and social harms.

The ADB-AM receives complaints related to environmental and social impacts caused by ADB-assisted projects. Complaints must demonstrate that ADB has failed to comply with its policies or procedures, resulting in direct, material harm. You can reference the ADB’s [Safeguard Policy Statement](#) and [Access to Information Policy](#).

The ADB has recently approved the [2024 Environmental and Social Framework](#). This framework will apply to new projects approved after January 2026. Until then, the Safeguard Policy Statement below applies.

 Including references to these policies is **optional** but can strengthen your complaint by identifying clear grounds for ADB’s accountability.

ADB POLICIES

Safeguard Policy Statement

Effective January 2010



The ADB requires its projects to comply with the [following requirements](#):

Safeguard Requirement 1: Environmental Safeguards

This standard ensures that projects are environmentally sustainable by requiring environmental impact assessments to identify, avoid, or mitigate environmental impacts and risks. Projects must adopt a mitigation hierarchy—avoiding, minimizing, mitigating, or offsetting impacts—and include an Environmental Management Plan (EMP) with mitigation measures, monitoring frameworks, and institutional arrangements. Meaningful consultation with stakeholders is required throughout the project lifecycle, alongside clear grievance mechanisms and robust monitoring to manage environmental risks.

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Safeguard Requirement 2: Involuntary resettlement

This standard addresses the physical and economic displacement of people caused by projects, aiming to avoid resettlement wherever possible. Where unavoidable, it ensures displaced persons receive compensation at full replacement cost, are offered livelihood restoration or improvement, and benefit from meaningful consultation. Projects must develop a Resettlement Plan to mitigate impacts, prioritize vulnerable groups, and include accessible grievance mechanisms and rigorous monitoring to ensure compliance and outcomes.

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Safeguard Requirement 3: Indigenous people

This standard protects Indigenous Peoples by ensuring respect for their identity, culture and rights while providing culturally appropriate benefits. Projects must:

- Conduct meaningful consultation with Indigenous Peoples throughout the project lifecycle.
- Avoid or minimize harm to lands, livelihoods, and cultural practices, with compensation or mitigation if impacts occur.
- Obtain Free, Prior, and Informed Consent (FPIC) for activities involving displacement, resource use, or cultural heritage.
- Develop an Indigenous Peoples Plan (IPP) to address impacts and ensure benefit-sharing.
- Establish an accessible grievance redress mechanism for affected communities.

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Safeguard Requirement 4: Special requirements for different financing modalities

This standard ensures ADB's environmental and social safeguards are applied consistently across various finance modalities and products:

- **Financial Intermediaries (FIs):** FIs must establish an Environmental and Social Management System (ESMS) to assess and manage risks for subprojects, ensuring compliance with ADB safeguards.
- **Programmatic and Sector Lending:** Frameworks are required to guide subproject screening, impact assessments, and safeguard planning. Meaningful consultation and capacity-building measures are integrated.
- **Multitranche Financing Facilities (MFFs):** Safeguard frameworks ensure consistent application of ADB policies across projects approved over time.
- **Emergency Assistance Loans:** Safeguard requirements may be streamlined during urgent situations, with frameworks addressing risks as components are implemented.
- **Corporate Finance:** Companies seeking general financing must undergo corporate audits of their environmental and social systems to address risks and compliance with ADB standards.

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Environmental & Social Framework

Effective January 2026

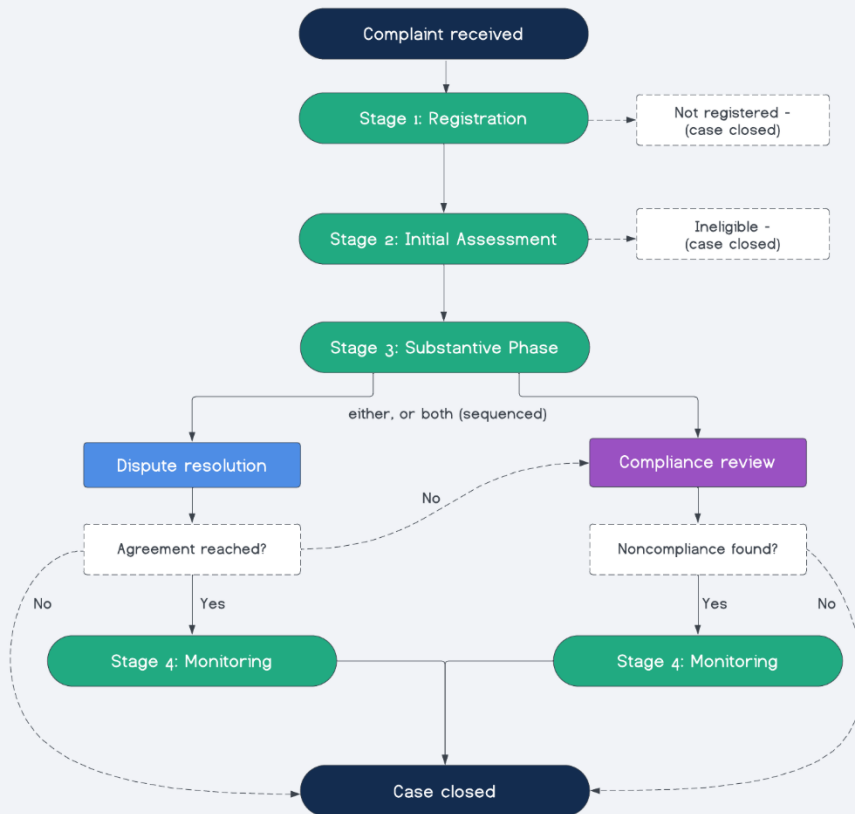
Coming soon.

ADB's Access to Information Policy

Effective January 2019

ADB's [Access to Information Policy](#) aims to enhance transparency and public accountability by maximizing access to information about its operations, while protecting legitimate confidentiality. The policy defines guidelines for the disclosure of project documents, decision-making processes, and operational information. It also establishes accessible procedures for stakeholders to request information, address concerns, and seek reviews of decisions regarding information disclosure.

⌄ What happens after you file a complaint?



Stage 1: Registration

After filing your complaint, the Complaint Receiving Officer (CRO) of the ADB-AM will review it and decide whether the complaint meets the basic criteria for registration.

To be registered, your complaint must include:

- **Two complainants:** For a complaint to be registered, it must contain the names and contact details for at least two complainants.
- **Project details:** Identification of the ADB-financed project, including its name and location. The project must be active or closed within the past two years. You may also submit complaints about proposed (but not yet approved) projects.
- **Environmental and social concerns:** The complaint must relate to environmental and social aspects of the project. If the complaint relates to other issues outside the scope of the ADB-AM (e.g. procurement or corruption), the CRO may forward your complaint to another ADB department or office to address those issues.

If your complaint meets these criteria, the CRO will register it and forward it to the appropriate office - either the Special Project Facilitator (SPF) or the Compliance Review Panel (CRP) - based on your selection of dispute resolution, compliance review, or both. Note: Registration of your complaint does not mean that your complaint is eligible for further action. Eligibility is assessed separately by the SPF and/or CRP depending on the function you chose.

If your complaint does not meet the registration criteria, the CRO will notify you and may request additional information or clarification.

Stage 2: Initial Assessment

After registration, your complaint enters the initial assessment stage. At the ADB-AM, there is no centralized eligibility assessment - instead, the complaint is forwarded to the relevant function(s), and each will conduct its own eligibility screening to understand the complaint and decide the next steps. The process includes: reviewing project documents and speaking with relevant parties; and determining complaint eligibility.

After receiving the complaint forwarded by the CRO, the Special Project Facilitator (SPF) will determine whether the complaint is eligible for **Problem Solving**, and the Compliance Review Panel (CRP) will determine whether the complaint is eligible for **Compliance Review**. This eligibility assessment includes:

1. **Attempted resolution:** The ADB-AM requires complainants to make prior **good faith efforts** to resolve their concerns directly with the ADB (mandatory except in cases with safety risks or fear of retaliation) and the project-level grievance mechanism (optional) before escalating the issue to the ADB-AM. If this step has already been taken and was unsuccessful, you should explain this when submitting your complaint.
2. **No prior complaints:** The issues raised in the complaint must be new (unless the subsequent complaint can be combined with and processed at the same time as the earlier complaint). If the ADB-AM has already reviewed the issues in a prior complaint, there must be new evidence or circumstances that were not available at the time of the initial complaint.
3. **Non-compliance:** Before a complaint is found eligible for the Compliance Review function, the CRP will assess whether: (i) there is evidence that the ADB has failed to comply with its environmental and social safeguard policies; (ii) there is evidence that the noncompliance has caused, or is likely to cause, direct and material harm to project-affected people; and (iii) the noncompliance is serious enough to warrant a compliance review.
4. **Problem-solving:** If problem-solving is desired, the SPF will ask whether its involvement could be useful to resolve the concerns raised by the complaint.

If your complaint is deemed ineligible for either function, you will be informed of the decision and the reasons behind it.

Stage 3: Substantive Phase

Once your complaint moves forward, it enters the substantive phase: which involves either **dispute resolution** or **compliance review**, depending on your chosen function. In some cases, both functions may happen sequentially (with dispute resolution happening first).

DISPUTE RESOLUTION

Dispute resolution is a voluntary process where the SPF helps facilitate a “problem-solving” process between you (the complainant) and the project promoter (the organization implementing the project).

This process can involve dialogue, mediation, information sharing, negotiation, or joint fact-finding. This process can and should be designed and implemented together. The aim of a dispute resolution is to reach an agreement between all the parties, and find a mutually agreeable solution to your concerns.

Voluntary: Since dispute resolution is voluntary, any party can choose not to participate and participation requires consent from all involved. If parties agree to participate, communities can share their concerns about the project directly with ADB’s client, and advocate for specific solutions to their concerns.

Outcome: If the parties reach an agreement, the SPF will help them to formalize those solutions in a signed agreement and will monitor its implementation. If no agreement is reached or the process is terminated early, the SPF may close the case or transfer it to compliance review, if applicable.

For more details on the dispute resolution process, refer to the [ADB Accountability Mechanism Policy](#).

COMPLIANCE REVIEW

The compliance review is a fact-finding process where the CRP investigates whether the ADB followed its policies when financing the project.

If at the assessment stage the CRP determines that an investigation is warranted, the CRP conducts a full investigation, including stakeholder consultations, site visits and technical assessments. A review of ADB’s compliance with its policies, focuses on harm linked to non-compliance.

After investigating, the CRP prepares a **compliance report** with findings and conclusions.

ADB Management will respond with an action plan for corrective actions (to be approved by the Board), and the CRP will monitor its implementation.

For more details on the compliance review process, refer to the [ADB Accountability Mechanism Policy](#).

Stage 4: Monitoring

If your complaint goes through a dispute resolution process and results in an agreement, or identifies non-compliance during a compliance review, then the complaint enters a monitoring phase.

DISPUTE RESOLUTION

COMPLIANCE REVIEW

If an agreement is reached, the SPF will monitor its implementation for up to two years. The SPF will set timelines, indicators and goals for monitoring and will regularly report on progress.

Cases are closed once the SPF determines that the commitments made by parties in the agreement have been fully implemented.

If non-compliance is identified, the CRP will issue a compliance report. ADB Management will prepare an action plan, in agreement with the borrower, with remedial actions to address the findings, which must be approved by the ADB Board. The CRP will monitor the implementation of this action plan for up to three years, providing annual monitoring reports and keeping the case open until full implementation is confirmed.

Real stories from communities who have filed complaints



Malir Expressway Project,
Pakistan

 DISPUTE RESOLUTION

Assessing the ADB-AM's performance

COMPARISON TO BEST PRACTICE

✗ **Independence:** The SPF's reporting line is not independent from bank management; it reports to the **President**.

✓ **Independence:** The CRP's reporting line is independent from bank management; it reports to the **Board** through the Board Compliance Review Committee.

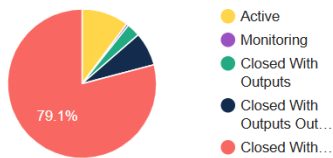
✓ **Transparency:** The ADB-AM makes **complaints, eligibility reports, final compliance reports, dispute resolution reports** and **follow-up monitoring reports** public.

✗ **Remedy:** There are **no explicit provisions** empowering the CRP to make recommendations for corrective measures to address areas of non-compliance, and does not explicitly have a mandate to recommend remedy for communities.

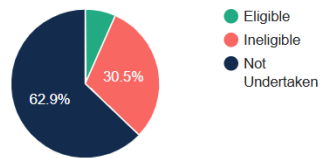
A LOOK AT THE DATA

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

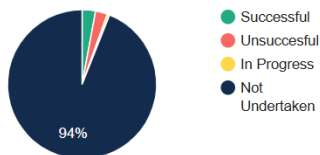
Complaint Outcomes



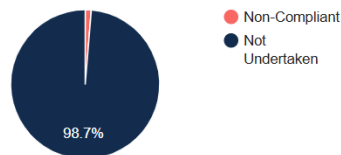
Eligibility



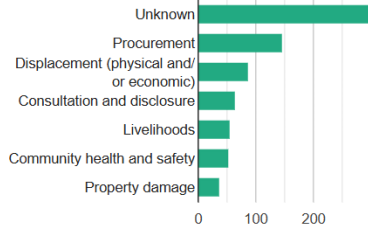
Dispute Resolution Outcomes



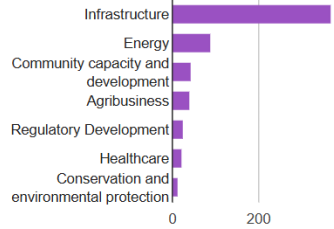
Compliance Review Findings







Complaint issues




Complaint sectors




RECOMMENDATIONS TO IMPROVE THE ADB-AM

-  The problem solving function should be made independent of management, similar to the compliance review function. (GPP 5)
-  Complainants should not be required to raise their complaint to ADB Operations Department or the borrower before approaching the AM. (GPP 32)
-  Complainants should have the ability to choose their representatives without limitations. (GPP 35)
-  The CRP should have the authority to proceed with compliance investigations, without needing authorization from the Board. (GPP 46)


 **Contact the ADB-AM**





 Asian Development Bank Accountability Mechanism: <https://www.adb.org/who-we-are/accountability-mechanism/how-file-complaint>


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 +63 2 636 2086

 To send complaints:
amcro@adb.org

 WhatsApp:
+63 999 999 1728

 Online complaint form:
<https://www.adb.org/sites/default/files/page/632461/am-complaint-form.docx>

 Complaint Receiving Officer
Accountability Mechanism
Asian Development Bank
6 ADB Avenue, Mandaluyong City 1550
Metro Manila, Philippines

Date Last Updated: Aug. 8, 2025