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Accountability in action or inaction?

An Empirical Study of Remedy Delivery in IAMs

Executive Summary

Over the past three decades, Independent Accountability Mechanisms (IAMs) have become central to the promise of accountability within development finance. Designed to provide communities harmed by bank-financed projects with access to justice, IAMs have now handled over 2,000 complaints globally. Yet until now, there has been no comprehensive, system-wide analysis of whether and how often these mechanism processes deliver meaningful remedy, defined by tangible, material outcomes that repair harm and improve lives.

This report fills that gap. Through a mixed-methods approach, we analyzed all 2,270 complaints filed to 16 IAMs through 2022, identifying commitments made by development banks or their clients in response to community grievances. We paired this quantitative review with 45 in-depth interviews across 25 complaints globally, centering the lived experiences of community members and civil society actors engaged in IAM processes. Together, these methods allowed us to assess not just the frequency of remedy, but its quality, credibility, and impact as experienced on the ground.

Our findings reveal both possibility and failure. IAMs are capable of facilitating creative, responsive, and sometimes transformative forms of remedy, ranging from cash compensation to policy reform, land restitution, infrastructure investments, and more. These outcomes, when they occur, are often directly aligned with community-defined visions of justice and redress. However, such successes are the exception rather than the norm. Only 15% of closed complaints led to any identifiable commitment, and 10% saw those commitments completed. Even among eligible complaints, where the prevalence of commitments is higher (46%), most outcomes fell short of repairing the full scope of harm. Many communities found themselves navigating slow, opaque, and deeply unequal processes, often facing retaliation, limited access to information, and exclusion from decision-making structures. Implementation failures were particularly acute. Hard-fought commitments were routinely delayed, diluted, A community of women engaged in fish drying in Khelkom (Sendou). In 2016, communities including these women filed a complaint to the FMO Independent Complaints Mechanism and African Development Bank Independent Recourse Mechanism expressing concerns about the siting of a 125 MW coal-fired power plant near the fishing community, pollution from the plant impacting their health and livelihoods, and lack of compensation for the loss of land.

or canceled outright, with IAMs lacking the mandate, resources, or leverage to ensure follow-through. Monitoring efforts were often passive, short-lived, or reliant on parties responsible for the harm in the first place. And while many IAMs track procedural progress, none systematically or transparently report on outcomes, a critical gap that undermines both learning and accountability.

Our analysis of 2,270 complaints across 16 Independent Accountability Mechanisms (IAMs) reveals a persistent gap between the promise of remedy and its realization. While IAMs have demonstrated the ability to produce creative, community-centered solutions, these successes are rare and unevenly distributed. Key findings include:

— **IAMs can deliver meaningful remedy, but successes are limited**. Only 46% of all eligible complaints resulted in any identifiable commitments, and only 31% of eligible complaints reported completion of any commitments.

— **The scale of remedy is dwarfed by the scale of harm**. Even when commitments exist, they often address only a fraction of the damage experienced by affected communities.

— **Implementation remains a critical bottleneck**. Commitments are frequently delayed, inadequately monitored, partially fulfilled, or canceled altogether — eroding community trust and undermining accountability.

— **Communities face significant structural barriers**. Power imbalances, retaliation risks, inaccessible information, language barriers, and financial constraints make meaningful participation difficult without civil society support.

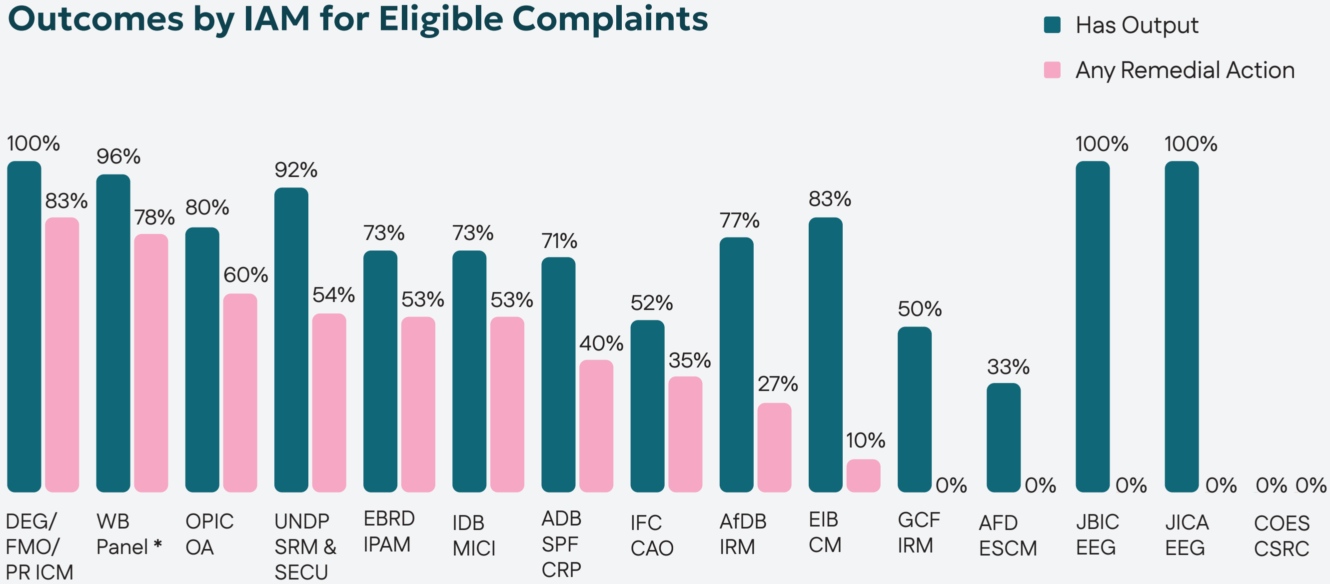
— **IAM reporting focuses on process, not outcomes**. Most IAMs track procedural milestones but fail to publicly report on whether commitments are delivered or harms are remedied, obscuring systemic gaps.

Despite these shortcomings, the report also highlights key levers for change. Civil society organizations have played an indispensable role in supporting communities through the IAM process, significantly increasing the likelihood of both commitments and implementation. Some IAMs have piloted promising practices, such as participatory monitoring, sustained engagement, and creative enforcement tools, that demonstrate the path forward. Remedy, we argue, must be reimagined not as a peripheral concern but as a core responsibility of development institutions. It must be adequately resourced, independently monitored, and centered around the needs and voices of affected people.

To address these systemic shortcomings and reorient IAMs toward outcomes that center community-defined visions of justice, we recommend that development banks and IAMs:

— **Develop a Remedy Framework**: Establish institution-wide standards ensuring that remedy is timely, adequate, and tailored to the needs of affected communities.

Outcomes by IAM for Eligible Complaints



* Reported remedial action comes from Bank Management reports which in most cases are not independently verified.

- **Empower IAMs with Mandates and Resources**: Equip mechanisms with the independence, staffing, and authority to monitor, enforce, and escalate when commitments stall.
- **Center Communities in Implementation and Monitoring**: Make monitoring participatory, ensuring communities have a voice in designing, tracking, and verifying commitments.
- **Enforce Consequences for Non-Implementation**: Require banks and clients to fulfill commitments, with clear penalties for delays, cancellations, or incomplete remedies.
- **Improve Transparency and Data Reporting**: Systematically track and publish outcomes across all complaints to evaluate effectiveness and strengthen institutional learning.

Ultimately, this report calls on development banks and their accountability mechanisms to make remedy a foundational element of responsible finance. This means adopting institutional frameworks that prioritize redress, ensuring IAMs are empowered to oversee and enforce commitments, and incorporating the outcomes of IAM processes into project evaluations and institutional learning. It also means addressing the profound structural imbalances — legal, cultural, linguistic, economic — that too often prevent communities from accessing the justice they are owed. Remedy is not just a moral imperative. It is a precondition for credible accountability, and a litmus test for whether development can truly claim to be inclusive, just, and rights-based.

Women impacted by a proposal to expand the airport in Phnom Pehn, Cambodia reflect on their struggle with AC staff. In 2013, with the support of Equitable Cambodia, impacted community members filed a complaint to the IFC Compliance Advisor/Ombudsman and successfully negotiated to change the project to prevent their displacement.

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