

World Bank Group Executive Directors

*via electronic mail*

September 14, 2023

Re: Review of IFC Remedial Framework

We understand that the IFC will soon present to the Board an updated draft of the Proposed Approach to Remedial Action. As the Board prepares to review the IFC's updated proposal, we wanted to list the minimum features that the updated draft should contain to be considered adequate. **If the IFC's proposed approach does not contain these commitments, we ask you to reject the draft and instruct IFC to try again.**

As we have previously shared with the IFC, including in a [joint statement on the draft Approach](#) and in briefing documents to the Board from [Spring 2022](#) and [2023](#), an effective remedial framework must, at minimum:

1. Commit that both IFC/MIGA and their clients have an obligation to remediate environmental and social harm;
2. Clarify that IFC/MIGA will contribute financially to remedy when it has contributed to harm;
3. Set out a clear approach to ensuring the availability of funding for remedial actions at both the IFC/MIGA and client levels, as recommended in the 2020 External Review of IFC/MIGA's accountability framework;
4. Commit to remediating environmental and social harm as a component of responsible exit and commit to not exiting projects subject to ongoing CAO cases without consent of community complainants; and
5. Commit to ensuring remediation of environmental and social harm already identified through the CAO process.
6. Describe how IFC/MIGA will ensure it has and will exercise necessary leverage, including contractual leverage, to ensure clients prevent and remediate harm in all projects.

These minimum features are not controversial, nor are they only important to civil society. Facilitator summaries from consultations with IFC/MIGA's other stakeholders - DFIs, IAMS, and clients - indicate [agreement](#) on many criticisms of the IFC's first draft.

We, and many other stakeholders, were disappointed in the IFC's first draft and have provided the IFC with detailed recommendations on how to improve. We hope that all of our recommendations will be adopted by the IFC in its second draft. We also hope that the Board will hold IFC accountable for meeting the minimum criteria listed above.

Thank you sincerely for your consideration. We are happy to discuss further. Please do not hesitate to reach out to Margaux Day who can help coordinate a conversation with all of the endorsing organizations below.

Sincerely,

Accountability Counsel  
Center for International Environmental Law (CIEL)  
Recourse  
Witness Radio (Uganda)  
Bank Information Center  
Arab Watch Coalition  
Buliisa Initiative for Rural Development Organization (BIRUDO) Uganda  
Jamaa Resource Initiatives (Kenya)  
Green Advocates International (Liberia)  
Peace Point Development Foundation (PPDF) Nigeria  
Oxfam  
Friends with Environment in Development (FED) Uganda  
Urgewald (Germany)  
Manushya Foundation (Laos, Thailand)  
Inclusive Development International  
Lumière Synergie pour le Développement  
Initiative for Right View  
EarthRights International  
Narasha Community Development Group  
Oyu Tolgoi Watch (Mongolia)  
Rivers Without Boundaries Coalition  
Just Ground  
Friends with Environment in Development (Uganda)  
Centre for Financial Accountability, India  
Global Labor Justice - International Labor Rights Forum  
Interamerican Association for Environmental Defense (AIDA)  
Observatoire d'Etudes et d'Appui à la Responsabilité Sociale et Environnementale (OEARSE)  
Phenix Center, Jordan  
International Accountability Project  
CEE Bankwatch Network