

Approach Paper

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# Environmental and Social Safeguards Evaluation

Corporate Evaluation



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## TABLE OF CONTENTS

### [ACRONYMS AND ABBREVIATIONS](#)

I.	ENVIRONMENTAL AND SOCIAL SAFEGUARDS FRAMEWORK.....	1
II.	EVALUATION OBJECTIVES, SCOPE AND QUESTIONS .....	4
	A. Evaluation Objectives and Scope .....	4
	B. Evaluation Questions.....	4
III.	METHODOLOGY.....	6
IV.	EVALUATION TEAM AND TIMELINE.....	9

### [ANNEX](#)

## ACRONYMS AND ABBREVIATIONS

ASR	Annual Supervision Report
EA	Environmental Assessment
EHS	Environmental, Health, and Safety
EIA	Environmental Impact Assessment
E&S	Environmental and Social
ESC	Environmental and Safeguards Compliance
ESG	Environmental and Social Safeguards Unit
ESS	Environmental and Social Strategy
ESMP	Environmental and Social Management Plan
ESMR	Environmental and Social Management Report
FI	Financial Intermediary
IAG	Independent Advisory Group
IDB	Inter-American Development Bank
IDBG	Inter-American Development Bank Group
IFC	International Finance Corporation
IIC	Inter-American Investment Corporation
LAC	Latin America and the Caribbean
MDB	Multilateral Development Bank
MICI	Independent Consultation and Investigation Mechanism
NSG	Non-sovereign Guarantee
OMJ	Opportunities for the Majority
OVE	Office of Evaluation and Oversight
PBL	Policy-Based Loan
PCR	Project Completion Report
PMR	Project Monitoring Report
SCF	Structured and Corporate Finance Department
SEA	Strategical Environmental Assessment
SEG	Environmental, Social and Governance Division
SG	Sovereign Guarantee
SPF	Safeguard Policy Filter Report
SSF	Safeguard Screening Form
TC	Technical Cooperation
VPS	Vice-Presidency for Sectors

## I. ENVIRONMENTAL AND SOCIAL SAFEGUARDS FRAMEWORK

- 1.1 This is the approach paper for the forthcoming evaluation of the Inter-American Development Group's (IDBG) environmental and social safeguards systems. The paper lays out the evaluation's objectives and scope, the evaluation questions and the methodology which OVE will apply to conduct the evaluation. The Bank and IIC Boards have requested that OVE undertake an evaluation of the IDBG's safeguards systems as part of its 2017-18 work program.
- 1.2 Concerns about environmental and social effects of public and private sector investments have increasingly entered the public arena as societal awareness of the potential risks and costs of not fully considering and managing these effects has grown. To minimize and mitigate potential negative environmental and social impacts of public and private sector investments they finance, Multilateral Development Banks (MDBs), including the IDBG have developed safeguards mechanisms.
- 1.3 In 1979 the Inter-American Development Bank (IDB) became the first MDB to adopt an environment policy, broadly mandating that the institution ensure the environmental quality of its operations in the region. Since then, the Bank's sustainability framework has been updated and broadened to also address certain social concerns—involuntary resettlement, indigenous peoples, and gender equality—and disaster risk management and a revised Environment and Safeguards Compliance (ESC) Policy was adopted in 2006. Table 1.1 shows the current framework of environmental and social (E&S) policies. While structured in various ways, each of these policies supports the Bank's commitment to sustainability through a two-pronged approach: mainstreaming—or enhancing E&S benefits (“doing good”); and safeguards—or avoiding, minimizing, and compensating for negative impacts (“do no harm”)<sup>1</sup>.

**Table 1.1 The IDB's Environmental and Social Policies**

Operational policy	Approval date
OP-703: Environment and Safeguards Compliance Policy	January 19, 2006
OP-710: Involuntary Resettlement Operational Policy	July 22, 1998
OP-765: Operational Policy on Indigenous Peoples	February 22, 2006
OP-704: Disaster Risk Management Policy	February 22, 2007
OP-761: Operational Policy on Gender Equality in Development	November 13, 2010

- 1.4 As part of the Bank wide realignment, all safeguards staff were consolidated in a new Environment and Safeguards Unit (ESG) in the Vice-Presidency for Sectors (VPS); and the Bank's Committee on Environment and Social Assessment, which in the past had reviewed projects' compliance with safeguards on behalf of the Loan Committee, was abolished and its compliance review function transferred to ESG. In 2009, to carry out a commitment to assess the implementation of the ESC policy, IDB established an Independent Advisory Group (IAG) to review progress on implementing the policy and to provide advice on potential improvements to it.

<sup>1</sup> OP 102, Access to Information Policy, while not a safeguards policy, is generally included in the safeguards framework as it spells out access to information requirements pertaining to safeguards.

- 1.5 The IDB's commitment to properly manage E&S risks associated with its investments was reconfirmed in the context of the ninth capital increase. Specifically, in the Overview Framework of the Cancun Declaration, the IDB's Governors "instruct[ed] the Board of Executive Directors to adopt a revised set of E&S safeguards fully consistent with the recommendations of the Independent Advisory Group on sustainability in its final report, and a revised set of social safeguards in line with international best practices".<sup>2</sup> Consequently, as part of its commitments under the ninth General Capital Increase, the IDB committed to present for approval of the Board an action plan with a revised set of E&S safeguards that are fully consistent with the recommendations of the IAG by the end of the first quarter of 2011. In early 2011, the IAG concluded that since the approval of the ESC policy in 2006, "the Bank has made great strides in implementing its requirements pertaining to safeguards."<sup>3</sup> Noting that other MDBs had launched a process to review their safeguards and sustainability policies and standards, it recommended that the Bank hold off on revising its policies until the other institutions had completed their work<sup>4</sup>. The Committee of the Whole and Management accepted the IAG's conclusion that the Bank's safeguards policies did not warrant revision at that time.
- 1.6 In response to recommendations by the IAG to strengthen the implementation of the ESC policy, management adopted an action plan to do so. In its mid-term evaluation of IDB-9 commitments, OVE found that the Bank's action plan was on balance substantially responsive to concerns raised in the IAG review and that most of the actions in Management's response to the IAG report were well under way, though work on many was still in progress.<sup>5</sup>
- 1.7 The Interamerican Investment Corporation (IIC) affirmed its commitment to sustainable development by adopting its Environmental and Social Sustainability Policy in 2013 ([CII/GP-16-7](#)) The policy replaced the Procedure for Environment and Labor Review of IIC Projects, CII/GP-5-6 which had been in force from 1999-2013. While highlighting several areas of particular focus (pollution prevention and resource efficiency; climate change mitigation and low carbon development; biodiversity, ecosystems services and protected areas and, social aspects, labor and health and safety), the policy specifies that "IIC assesses potential E&S risks and impacts of all proposed investments for compliance with host country laws and regulations and this Sustainability Policy and associated standards and guidelines prior to final approval thereof. These standards include the IDB Environment and Safeguards Compliance Policy, other IDB safeguard policies and sector guidelines, the Performance Standards (PS) on Environmental and Social Sustainability of the International Finance Corporation (IFC), and the World Bank Group/IFC Environmental Health and Safety Guidelines (EHS Guidelines)". As

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<sup>2</sup> [AB-2764](#), page 26

<sup>3</sup> Independent Advisory Group on Sustainability (2011): Final Report to the Inter-American Development Bank, Washington, DC, January 2011

<sup>4</sup> While IAG didn't recommend revision of the safeguards policies, it did suggest that the Bank adopt new benchmarks as they are being set by other MDBs. While IDB is awaiting completion of the World Bank's revisions of safeguards policies, it has started preparing some guidelines in line with some of the standards of other MDBs.

<sup>5</sup> OVE, IDB-9 Mid-Term Evaluation, Background Paper on Environmental and Social Safeguards, including Gender Policy

such it is thus not a self-contained policy, but also integrates IDB's safeguards policies and IFC's performance standards and Industry Sector Guidelines.

- 1.8 With the merge-out, IIC's Renewed Vision ([CA-556](#)) confirmed that IIC's updated policies and procedures would at a minimum maintain IIC's current environmental and social safeguards. The Busan resolution ([CII/AG-2/15](#)) in combination with the cross-booking regulations specified that IIC's E&S sustainability policy will apply to all newly approved IIC operations (including cross-booked operations), while IDB's E&S policies will continue to apply to NSG legacy operations approved by IDB. IIC has significantly expanded its E&S capacity by establishing a dedicated unit to handle compliance with E&S safeguards and performance standards<sup>6</sup>.
- 1.9 In 2010, IDB's Board approved the policy to establish the Independent Consultation and Investigation Mechanism (usually known by its Spanish acronym, MICI) as an avenue for potentially affected parties to lodge complaints about alleged Bank non-compliance with its safeguards policies. In creating the MICI, the Board sought to place the Bank in the mainstream of MDB practice to establish an independent accountability mechanism as an external check on Bank compliance with its policy. The Cancun Declaration and IDB-9 Agreements called on the Bank to fully implement the MICI policy. In 2012, OVE was tasked with evaluating the first two years of MICI -- an evaluation that had been mandated by the MICI policy. The OVE evaluation identified significant problems in MICI's policy, structure and operations and recommended that MICI's pilot phase be terminated and its policy reformulated. Consequently, MICI was relaunched in December 2014, with a new policy and structure. In addition, starting in 2016, MICI became responsible for handling safeguards complaints about the newly created IIC.
- 1.10 MICI provides potential requesters two avenues, a consultation function and a compliance review function. The first seeks to provide an opportunity to address the issues raised by the requesters related to potential harm caused by alleged failure of the Bank or the IIC to comply with one or more of their policies. The compliance review function seeks to investigate allegations by requesters that the Bank or IIC have failed to comply with their policies and as a result have caused harm to the requesters. While MICI's primary function is to help address issues that may result from the Bank's or IIC's non-compliance with its safeguards and related policies, it also harbors the potential to enhance the quality of Bank or IIC operations by generating lessons from such cases and providing guidance to these institutions on the implementation of their safeguards policies emerging from such lessons.

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<sup>6</sup> Prior to the merge-out, E&S matters were handled by a small number of E&S staff in the Development Effectiveness Division.

## II. EVALUATION OBJECTIVES, SCOPE AND QUESTIONS

### A. Evaluation Objectives and Scope

- 2.1 The evaluation seeks to provide the Boards and IDB and IIC management with information on how well the two institutions' current safeguards and sustainability policies serve to prevent, mitigate and manage E&S risks associated with their projects, how effectively the policies are being applied, and what their results have been.
- 2.2 The evaluation will cover the current E&S safeguards frameworks for both, IDB and IIC. The evaluation will focus on the safeguards aspects of the relevant IDBG policies. A parallel evaluation on gender and diversity will review the mainstreaming aspects of the gender and indigenous peoples' policies. The evaluation will also include a review of MICI's contribution to the functioning of the IDBG's safeguards systems since the adoption of the new MICI policy.

### B. Evaluation Questions

- 2.3 The overarching question the evaluation seeks to answer is: **How effective have the IDBG's safeguards systems been in preventing, managing, and mitigating adverse environmental and social impacts of IDBG financed operations and in building client capacity to manage environmental and social impacts?**
- 2.4 The evaluation will address the following specific questions:
- a) **How well are the IDBG's current safeguards policy frameworks suited to prevent, manage and mitigate adverse environmental and social impacts?**
- i. How have the IDBG safeguards policy framework evolved over time?
  - ii. What do IDBG's and IIC's current safeguards policy frameworks cover and what are main differences between them?
  - iii. What are the main differences between IDBG's and other MDBs' safeguards policies?
  - iv. How, if at all, have the relevance and adequacy of IDB's and IIC's safeguards policy frameworks been affected by the evolution of IDBG's SG and NSG portfolios since their adoption?
- b) **How effectively have IDBG safeguards policies been applied?**
- i. Are the responsibilities for implementing the safeguards policy frameworks clear?
  - ii. To what extent have IDBG organizational arrangements and processes facilitated effective implementation of safeguards policies?
  - iii. What budget resources is IDBG allocating to facilitate safeguards policy application?
  - iv. How effectively have IDBG safeguards policies been applied during **project preparation, structuring and appraisal?**
  - v. How effectively have IDBG safeguards policies been applied during **project implementation?**

- vi. To what extent do IDBG project implementing agencies/clients have the capacity to effectively implement IDBG safeguards policies. What support has IDBG provided to help build such capacity?

**c) What have been the results of IDBG safeguards policies?**

- i. To what extent have IDBG safeguards policies helped prevent, manage and mitigate environmental and social project impacts?
- ii. To what extent have IDBG's safeguards systems and operations helped strengthen countries/clients' capacity to manage and mitigate social and environmental impacts, including country safeguards systems?

**d) How effectively is MICI supporting IDBG's safeguards systems?**

- i. To what extent do the revised MICI policies and their application thus far support the IDB Group's application of and compliance with safeguards policies?
- ii. To what extent have MICI's operations and related management follow-up helped address requesters' concerns related to the application of IDBG safeguards policies?
- iii. To what extent have MICI's operations and related management follow-up fostered learning and improvement on the implementation of safeguards?

### III. METHODOLOGY

- 3.1 To address these questions OVE will use a mix of complementary methods, including document reviews, analysis of processes and portfolio data, interviews and surveys, and desk and field based evaluations of individual projects. OVE will also explore the possibility of using analytics tools to capture and analyze information from social media and other online sources pertaining to potential E&S effects of IDB and IIC funded operations or to their safeguards frameworks more generally. The main methods are described in more detail below and in the Annex.<sup>7</sup>

**Table 3.1. Key Evaluation Questions and Methods**

Key Evaluation Questions	Evaluation Methods						
	Desk-review of projects	Field case studies of projects	Interviews/Surveys	Portfolio analysis	Review of policies and guidelines	Review of procedures / organizational arrangements and resource allocation	MICI background paper
How well is the IDBG's current safeguards policy framework suited to prevent, manage and mitigate adverse environmental and social impacts ?	√	√	√	√	√	√	√
How effectively have IDBG safeguards policies been applied?	√	√	√		√	√	
What have been the results of IDBG safeguards policies?		√	√				
How effectively is MICI supporting IDBG's safeguards systems?		√	√		√	√	√

- 3.2 **Portfolio analysis.** OVE will assemble portfolio information from various IDBG systems (e.g. IDEAS, Maestro, Convergence, MrBlue, OVEDA) in order to establish a database that will form the basis for the portfolio wide data analysis. The portfolio analysis is intended to provide overall insights into the evolution of IDBG's portfolio since the adoption of safeguards policies, for example, in terms of lending instruments, E&S categorization of projects or frequency with which safeguards policies have been triggered.
- 3.3 **Desk-review of projects.** To gain an understanding of how effectively safeguards policies have been applied during project **preparation, structuring, appraisal and implementation**, OVE will undertake a desk-review of random samples of IDBG projects. The universe of IDB projects from which the samples will be drawn includes all the loans and guarantees approved by IDB between 2011 and June 2017, including operations with and without sovereign-guarantee (SG and NSG).

<sup>7</sup> The Annex includes an evaluation matrix that describes the specific methods and tools to address the different evaluation questions.

- Choosing this time period will allow OVE to assess a meaningful number of operations approved under the current IDB's safeguards policy framework and cover the period since the completion of OVE's IDB-9 mid-term evaluation which included a background paper on IDB's commitments pertaining to safeguards.<sup>8</sup> The universe of IIC approved projects includes all the loans and guarantees approved between September 2013 (the effective date of the current IIC's Environmental and Social Sustainability Policy) and June 2017.
- 3.4 For high and medium E&S impact projects -- category A and B projects --,<sup>9</sup> the desk-based review will be carried out on a stratified representative sample of about 150 randomly-selected projects which constitutes about 1/3 of all category A and B operations approved over the review period.<sup>10</sup> They will be reviewed to assess the adequacy of safeguards risk classification as well as to what extent and how effectively safeguards policies have been complied with throughout the project cycle.
- 3.5 In addition, OVE will undertake a desk-review of a smaller random sample of about 40 low impact category C projects to assess the adequacy of their risk classification. The universe from which the sample will be drawn includes all the category C projects approved between 2011 and June 2017 (between September 2013 and June 2017 for IIC), and with significant disbursed resources (more than 50%). Additionally, the universe of policy-based loans (PBLs) approved over the last two years will be reviewed to assess to what extent their potential E&S risks were considered and mitigated in accordance with the relevant E&S policy directive.<sup>11</sup> The samples of different categories of projects will be analyzed using templates with standardized questions to ensure consistency in evaluation across projects.
- 3.6 OVE recently completed an evaluation of the IDBG's work through FIs, with a background paper on E&S safeguards ([RE-486-2](#)) that pointed to significant safeguards related shortfalls among the FI portfolio. As part of the policy and procedures analysis, OVE will assess to what extent the IDBG is addressing the key safeguards related shortfalls identified in this OVE evaluation.

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<sup>8</sup> The most recent safeguard policy (Operational Policy on Gender Equality in Development - OP-761) was approved in November 2010.

<sup>9</sup> IDBG categorizes all projects into one of four E&S impact categories, with **category A** projects being those with most significant and mostly permanent E&S impacts, **category B** being that cause mostly local and short-term impacts, and **category C** projects being those with minimal or negative impacts. In addition, a fourth category, **B13** is reserved for non-investment lending and flexible lending instruments, such as Financial Intermediary Operations and Policy Based Loans.

<sup>10</sup> The stratified sample will be drawn randomly to be statistically representative at 85% with a margin of error of +/-5% of the relevant IDBG portfolio.

<sup>11</sup> It is foreseen that these random samples will be illustrative rather than statistically representative given the more limited safeguards requirements. **Category C** operations do not require an environmental and social analysis beyond the screening and scoping analysis for determining the classification. However, the OP-703 indicates that where relevant, these operations will establish safeguards or monitoring requirements. For **PBLs**, the Bank should analyze during the design phase whether specific country policies and/or institutional changes supported by the operation will have significant and direct effect on the country's environment and natural resources. For PBLs that may have significant direct negative implications on environmentally sensitive sectors, these loans will require to adopt relevant sector analytical work and Strategic Environmental Assessments (SEAs).

- 3.7 Key documents to be considered during the desk-review include: safeguards screening filters and reports, environmental and social strategies (ESSs), environmental and social (impact) assessments (EAs),<sup>12</sup> environmental and social management plans (ESMPs), Environmental and Social Action Plans (ESAPs) and other relevant plans (e.g. resettlement plans), loan documents and contracts, environmental and social management reports (ESMRs), monitoring and completion reports (PMRs, ASRs, PCRs, XSRs), safeguards supervision reports, and MICI reports. The desk-review of projects will be complemented with interviews with IDBG staff involved in the projects as necessary.
- 3.8 **Field case studies.** OVE will also undertake in-depth field based case studies of specific projects to assess the effectiveness of **implementation and results** of application of the safeguards policies in mitigating E&S impacts, managing risks, and helping build client capacity to manage such risks. OVE has identified the following potential countries for cases studies: **Brazil, Peru, Paraguay, Nicaragua, Haiti, and Uruguay.** These countries were selected because of the number of category A and B operations approved since 2011, geographical representation, mix of sizes, income and capacity levels, and to take advantage of synergies in OVE's work program, particularly the parallel OVE evaluation on Gender and Diversity. To select the projects (approximately five projects per country), OVE will consider operations in implementation or that have recently been completed and a diverse pool of: (i) category A and B projects; (ii) SG and NSG operations; (iii) economic sectors; and (iv) lending instruments. The assessments of specific projects will build on preliminary desk-reviews, and explore in more depth in the field what project safeguards implementation experience and results have been, what factors have affected the latter and what lessons can be learned. Field studies will also look at the extent to which IDBG has helped strengthen countries/clients' capacity to manage and mitigate E&S risks, including country safeguards systems.
- 3.9 **Analysis of IDBG's safeguards policy framework.** To gain an understanding of how well the current safeguards policy frameworks are suited to prevent and mitigate adverse E&S impacts, OVE will undertake a contents analysis of the various policies and guidelines constituting IDB's and IIC's safeguards policy frameworks with the aim of identifying relative strengths and weaknesses, including potential coverage gaps. To provide a comparative perspective, OVE will also look at other MDBs' safeguards policies, with particular focus on those MDBs that recently updated their policy framework or are in the process of doing so.
- 3.10 **Analysis of IDBG's safeguards procedures, organizational arrangements and resource allocation.** To gain an understanding of the extent to which IDBG's internal capacity facilitates effective implementation of safeguards policies, OVE will review the key safeguards processes throughout the project life-cycle, as well as the associated systems, policy guidelines and tools. OVE will also review specific safeguards organizational arrangements, including ESG/SEG organizational structures and special working agreements between IDB and IIC in the context of the merge-out. In addition, OVE will review the budgetary resources allocated to safeguards application.

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<sup>12</sup> Depending on the risk classification and the project, it may include Environmental Impact Assessments (EIAs), Environmental Assessments (EAs), and Strategic Environmental Assessment (SEAs).

- 3.11 **MICI background paper.** The MICI background paper will build on OVE's evaluation of MICI completed in 2012 and review to what extent the key shortcomings in the MICI policy and MICI's functioning identified during that evaluation have been addressed, how supportive the restructured MICI has been thus far of the application of IDBG's safeguards policies, how effectively it is helping to address requestors' concerns and to what extent it is generating lessons for IDB and IIC that can help strengthen the effectiveness of their safeguards systems. To this effect, OVE will undertake a review of the new IDB and IIC MICI policies, assess the handling of each MICI complaint received since MICI's restructuring; identify the relevant lessons from MICI's legacy cases, review relevant documents and procedures and interview MICI, IIC and Bank staff as appropriate. In the context of the safeguards field studies, the perspective of requestors and IDB/IIC counterparts/clients involved with recent MICI cases will also be sought.
- 3.12 **Interviews/Surveys.** The analysis of data and documents will be complemented with structured interviews and surveys of relevant stakeholders, including: (i) IDBG safeguards staff (ESG and SEG); (ii) IDBG managers and specialists; (iii) MICI staff; (iv) IIC and former IDB NSG clients; (v) government officials and staff of executing agencies; (vi) staff of other MDBs involved in the design and implementation of safeguards policies and procedures; (v) other project stakeholders and civil society groups.

#### IV. EVALUATION TEAM AND TIMELINE

- 4.1 **Evaluation team:** The evaluation team includes Monika Huppi and José Ignacio Sémblér (team leaders), Coral Fernandez, Ulrike Haarsager, Roni Szwedzki, Patricia Oliveira, Rasec Niembro, Johanan Rivera, Joaquin Rey, Maya Jansson, Frank Fragano and Juan Quintero (Sr. Safeguards Consultants). The evaluation work related to MICI will be undertaken under the guidance of the evaluation team leaders by Victoria Elliott (Sr. Consultant) and Stephany Maqueda. The team will be supported by additional external safeguards specialist consultants as needed.
- 4.2 **Timetable:** The draft report is expected to be ready for Management review in February 2018 and for submission to the Board of Executive Directors in March 2018. The expected timetable is shown in Table 4.1.

**Table 4.1. Expected Timetable**

Activity	Date
Approach Paper to Board	September 2017
Draft for Management review	February 2018
Delivery to the Board of Executive Directors	March 2018

**ANNEX**  
**EVALUATION MATRIX**

Evaluation Questions	Evaluation Methods						
	Desk-review of projects	Field case studies of projects	Interviews/Surveys	Portfolio analysis	Review of policies and guidelines	Review of procedures / organizational arrangements and resource allocation	MICI background paper
<b>How well are the IDBG's current safeguards policy frameworks suited to prevent, manage and mitigate adverse environmental and social impacts?</b>	√	√	√	√	√	√	√
<ul style="list-style-type: none"> <li>How have the IDBG safeguards policy frameworks evolved over time?</li> </ul>					√		
<ul style="list-style-type: none"> <li>What do IDB's and IIC's current safeguards policy frameworks cover, and what are the main differences between them?</li> </ul>					√		
<ul style="list-style-type: none"> <li>What are the main differences between IDBG's and other MDBs' safeguards policies?</li> </ul>			√		√		
<ul style="list-style-type: none"> <li>How, if at all, has the relevance and adequacy of IDB's and IIC's safeguards policy frameworks been affected by the evolution of IDBG's SG and NSG portfolios since their adoption?</li> </ul>			√	√	√		
<b>How effectively have IDBG safeguards policies been applied?</b>	√	√	√		√	√	
<ul style="list-style-type: none"> <li>Are the responsibilities for implementing the safeguards policy frameworks clear?</li> </ul>			√		√	√	
<ul style="list-style-type: none"> <li>To what extent have IDBG organizational arrangements and processes facilitated effective implementation of safeguards policies?</li> </ul>			√		√	√	
<ul style="list-style-type: none"> <li>What budget resources is IDBG allocating to facilitate safeguards policy application?</li> </ul>						√	
<ul style="list-style-type: none"> <li>How effectively have IDBG safeguards policies been applied during project preparation, structuring, appraisal?</li> </ul>	√	√					
<ul style="list-style-type: none"> <li>How effectively IDBG safeguards policies have been applied during project implementation?</li> </ul>	√	√					
<ul style="list-style-type: none"> <li>To what extent do IDBG project implementing agencies/clients have the capacity to effectively implement IDBG safeguards policies? What support has IDBG provided to help build such capacity?</li> </ul>		√	√				

Evaluation Questions	Evaluation Methods						
	Desk-review of projects	Field case studies of projects	Interviews/Surveys	Portfolio analysis	Review of policies and guidelines	Reviews of procedures / organizational arrangements and resource allocation	MICI background paper
<b>What have been the results of IDBG safeguards policies?</b>		√	√				
<ul style="list-style-type: none"> <li>To what extent have IDBG safeguards policies helped prevent, manage and mitigate environmental and social project impacts?</li> </ul>		√	√				
<ul style="list-style-type: none"> <li>To what extent have IDBG's safeguards system and operations helped strengthen countries/clients' capacity to manage and mitigate social and environmental risks, including country safeguards systems?</li> </ul>		√	√				
<b>How effectively is MICI supporting IDBG's safeguards systems?</b>		√	√		√	√	√
<ul style="list-style-type: none"> <li>To what extent do the revised MICI policies and their application thus far support the IDB Group's application of and compliance with safeguards policies?</li> </ul>			√		√		√
<ul style="list-style-type: none"> <li>To what extent have MICI's operations and related management follow-up helped address requesters' concerns related to the application of IDBG safeguards policies?</li> </ul>		√	√				√
<ul style="list-style-type: none"> <li>To what extent have MICI's operations and related management follow-up fostered learning and improvement on the implementation of safeguards?</li> </ul>			√			√	√