

IDB Environmental and Social Grievance Protocol



20
25

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Annual
Report





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Acronyms

ESPF

Environmental and Social Policy Framework

IDB

Inter-American Development Bank

MGM

Management-led Grievance Mechanism

MICI

Independent Consultation and Investigation Mechanism
(MICI for its acronym in Spanish, Mecanismo Independiente de Consulta e Investigación)

OII

Office of Institutional Integrity

Executive Summary

In 2025, the Inter-American Development Bank (IDB) continued consolidating implementation of its Environmental and Social Grievance Protocol, a mechanism that allows stakeholders to voice concerns related to environmental and social aspects of IDB-financed projects. Within this framework, Executing Agencies remain responsible for project design and implementation, as well as for implementation of agreed-upon grievance-related Action Plans, whereas the IDB's role is focused on facilitating dialogue, monitoring, and coordinating the grievance process. In this context, the Protocol also serves as an operational channel to receive, escalate, and help manage grievances related to IDB-financed projects beyond the application of the Environmental and Social Policy Framework (ESPF), complementing Management's risk-based approach during project implementation.

This report presents the main trends, key topics, and opportunities identified in grievance management during the year and how they compare with previous years; a case study of grievance management from Brazil; and lessons learned to strengthen project preparation and supervision and grievance management itself.

During 2025, the Protocol managed a growing number of grievances across multiple sectors and countries, with cases concentrated particularly in the Transport, Water and Sanitation, and Urban Development and Housing Sectors in Peru, Brazil, and Argentina. A significant share of grievances related to (i) labor and working conditions, mainly involving

workplace harassment allegations; (ii) land acquisition and involuntary resettlement, mainly related to allegations of inadequate compensation for economic displacement and inadequate resettlement assessments regarding physical displacement; and (iii) community health and safety, mainly related to allegations involving health impacts or nuisances to people or communities. The report notes that some situations escalated rapidly, often related to grievances involving opposition to certain infrastructure projects, insufficient early and ongoing consultations, insufficient accessibility to information disclosure for complainants and stakeholders, and challenges in terms of the effectiveness of project-level grievance mechanisms to resolve grievances.

Findings from grievance management highlight recurring resolution bottlenecks, including high expectations of complainants regarding compensation, delays in delivery of resettlement solutions, and completion of works, as well as insufficiently clear communication about proposed measures such as eligibility criteria, valuation methods, and timelines. Many complainants first sought resolution through Executing Agencies before escalating their grievance to the IDB when responses were perceived as inadequate.

The Protocol's application in 2025 reinforced the value of early dialogue, continuous stakeholder engagement, and adaptive grievance handling tools, including Grievance Action Plans with clearly assigned responsibilities and follow-up measures.

Executive Summary

Lessons learned emphasize the importance of strengthening resettlement and livelihood restoration planning; ensuring sufficient implementation budgets and qualified social teams; incorporating non-financial compensation measures; and updating censuses and plans during project execution.

Cases also highlighted the importance of providing affected communities with timely and accessible information on eligibility criteria, compensation methodologies, implementation schedules, construction timelines, and available grievance channels, particularly for vulnerable populations and communities with limited access to technical information. In addition, the report highlights the Protocol's role in feeding lessons learned back into the design of new projects in order to help prevent recurrent drivers of grievances and patterns of escalation.

Looking ahead, the IDB will continue to strengthen the effectiveness and timeliness of grievance management under the Protocol, promoting earlier risk identification, strengthening project-level grievance mechanisms, and systematically integrating lessons learned into project preparation and supervision to reduce the risk of conflict and support more sustainable environmental and social outcomes.

Introduction



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Introduction

The [Environmental and Social Policy Framework \(ESPF\)](#) of the Inter-American Development Bank (IDB) was approved on September 16, 2020, and came into effect in November 2021. The framework provides the IDB's clients with ambitious environmental and social standards and leading-edge provisions to tackle environmental and social issues in IDB-financed projects.

The IDB Grievance Protocol was created based on the requirements of the ESPF and has been in force since November 2021. The Protocol provides a channel for stakeholders to contact the IDB directly to file a grievance about environmental and social issues or the performance of IDB-financed projects in this regard. The Protocol is an internal process that establishes the implementation procedures, steps and actions, timing, responsibilities, and resources needed to address grievances filed directly with the IDB.

People, stakeholders, and communities affected by these projects have three channels to submit grievances related to environmental and social issues associated with the projects:

1. A project-level grievance mechanism operated by the Executing Agency, including its contractors or subcontractors, or any other state-based or local grievance mechanisms.
2. Contacting the IDB directly through its [Grievance Protocol](#) at quejas@iadb.org, messaging or calling the IDB at +1 (202) 826-3705, or filling out this online [form](#).
3. The Independent Consultation and Investigation Mechanism ([MICI](#), for its

acronym in Spanish), a last-resort mechanism independent of IDB Management to address grievances.

The Grievance Protocol is part of the IDB Grievance Management System. The first level of the system is the project-level grievance mechanism, which includes the Borrower's project-level grievance mechanism as well as the contractors' grievance mechanisms, when applicable. This is followed by the management-led grievance mechanisms at the IDB Group, which include the IDB Grievance Protocol for the public sector. Finally, the MICI is a last resource mechanism. MICI is operationally independent from project teams and IDB Management and reports directly to the Board of Executive Directors. Among other eligibility criteria, MICI's [policy](#) requires that there has been previous engagement by the complainants with IDB Management, and also that there is an alleged harm that could result from potential noncompliance with one or more relevant IDB Operational Policies.

The Protocol applies when a grievance meets both of the following criteria: (i) it is related to an IDB project that is in preparation, approved, or in execution, or within 24 months after the last disbursement; and (ii) it is related to environmental and/or social aspects of a project. Any affected person, group, or stakeholder interested in filing a grievance (hereafter called "the complainant") about an environmental and/or social issue related to an IDB project may contact the Bank, regardless of whether they have used any other local or project-level grievance mechanism to present their concerns.

Introduction

In March 2025, the Protocol was updated to exclude the applicability of grievances related exclusively to non-payment of workers (including both Executing Agency and contractor workers) or firms. An analysis of previously managed non-payment grievances revealed that the added value of addressing these cases through the Protocol was minimal. However, the exclusion of such grievances from the Protocol's management does not mean they are disregarded; instead, the Protocol refers these cases to the IDB project team, which ensures that these matters are addressed with the Executing Agency as part of the Bank's regular environmental and social supervision.

Although not a prerequisite, complainants are also encouraged to use the respective project-level grievance mechanism, if appropriate. That said, there may be occasions when the complainant is uncomfortable raising a concern through the Executing Agency's project-level grievance mechanism and may instead prefer to contact the IDB directly. This may be the case, for example, if the complainant has a fear related to retaliation, prosecution, discrimination, or security. The IDB's grievance process analyzes these grievances immediately upon receiving them in order to assign a fast-track process to those cases that may represent an imminent risk to the complainant, the environment, or others.

The Grievance Management Process



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The Grievance Management Process

After **registering** the grievance, the Protocol team, together with the respective IDB project team, proceeds to notify complainants and determine **applicability**. Applicability is determined solely based on whether the grievance complies with the two IDB Grievance Protocol applicability criteria: whether the grievance is related to an environmental and/or social aspect broadly, and whether it is related to a project financed by the IDB in preparation, execution, or up to 24 months after the last disbursement. This applicability determination process does not involve considering or analyzing the legitimacy, technical soundness, or validity of the allegations made in the grievance.

This step is followed by an **assessment and response process**, which begins with a bilateral listening session between the IDB and complainants to gather information about the concerns raised and allegations made, while also providing clear information on the grievance management process and the scope of the Grievance Protocol. During this phase, information is collected about the issues raised in the grievance, the stakeholders involved, and the grievance and project context. This is done to further understand the background and proceed to developing a grievance analysis that includes alternatives for resolution, actions to be addressed, and risk scenarios both internally (i.e., for the Bank's project team and/or Executing Agency) and externally (i.e., the sociopolitical context). When needed, the Executing Agency develops and implements a Grievance Action Plan—with support from the IDB—that is agreed upon with complainants and aims to address each aspect of the grievance. The Grievance Action Plan includes a series of actions and/or

activities that address each subtopic or issue of the grievance, with clear deadlines and responsible parties for implementation. The Grievance Action Plan also includes, when possible, actions related to the specific grievance topic. At the same time recommendations are made by the Protocol, together with the IDB project team, regarding areas identified to strengthen the project's social and environmental management that would be part of the Bank's regular social and environmental supervision. For workplace-related grievances, mainly those related to workplace harassment and contract disputes, dismissals, and inadequate working hours, the Executing Agency develops bilateral Grievance Action Plans that are agreed upon with the IDB, as most of these grievances are confidential and joint Grievance Action Plans cannot be agreed upon with complainants. If there is agreement on the Grievance Action Plan between the Executing Agency, the complainant, and the IDB, the IDB project team then monitors completion of the plan as part of the Bank's regular social and environmental supervision of the project.

The IDB may **close** a grievance under any of the circumstances described in the paragraphs that follow. Ideally, a grievance can be closed when the actions agreed upon in the Grievance Action Plan have been implemented by the Executing Agency. The IDB confirms with the complainant that these actions have been implemented and proceeds with closure.

In some cases, no Grievance Action Plan is required if the dialogue process, led by the Executing Agency with the support of the IDB, provides a response that addresses the

The Grievance Management Process

grievance allegations or aspects, after which the grievance is closed. An example might be when a complainant requests specific information about the project works timeline or clarification or further information about a specific aspect of its environmental and social management plans, which is then shared by the Executing Agency with the complainant.

The IDB may also close a grievance when no agreement is reached between the Executing Agency, complainants, and the IDB, despite several proposals by the Executing Agency with support from the IDB for different alternatives for grievance resolution, numerous sessions between main stakeholders as part of a dialogue process, or when conditions for dialogue between parties no longer exist. Some examples of these situations include when complainants maintain inflexible positions regarding their request for increased compensation amounts, even when the Executing Agency, with IDB support, has offered alternative solutions within the scope of the program, such as access to public housing schemes or livelihood restoration measures, which were nevertheless perceived as insufficient. Similarly, in some instances, complainants have conditioned their willingness to reach an agreement on demands that fall outside the scope of the project. In these cases, classified as “closed non-agreement,” the IDB informs the complainant of the reasons for closure and about the other available grievance channels at the IDB Group, including the MICI.

Other reasons for closure, separate from non-agreement closure, include the complainant withdrawing the grievance or the IDB closing a grievance due to lack of

complainant response despite several attempts at communication. According to the IDB Grievance Protocol’s data, complainants withdraw their grievance when the allegations raised are resolved, mainly before the IDB grievance management process begins, or when the scope of the grievance management process within the IDB Grievance Protocol framework is considered inappropriate or insufficient by the claimants to address their requests, and they decide to resort to other available mechanisms.

The Protocol **offers confidentiality** for those complainants that request it, which implies that their personal information, or any information that may identify them, is not shared with the Executing Agency and is shared internally only on a need-to-know basis within the IDB. Sensitive grievance cases, such as workplace harassment, among others, are classified by the Protocol as confidential by default unless the complainant states otherwise during the first listening space. The Protocol does not accept anonymous grievances, as the grievance management process requires a point of contact in order to agree on the steps and procedures jointly with the complainant, as well as to validate the actions taken to address the grievance. However, if the Grievance Protocol receives an anonymous grievance, it informs the IDB project team of the existence of this alert so it can be addressed.

To learn more about what to expect after submitting a grievance, here is a [step-by-step](#) guide to the IDB Grievance Protocol describing the information-gathering and dialogue processes to solve and agree upon potential solutions to a grievance.

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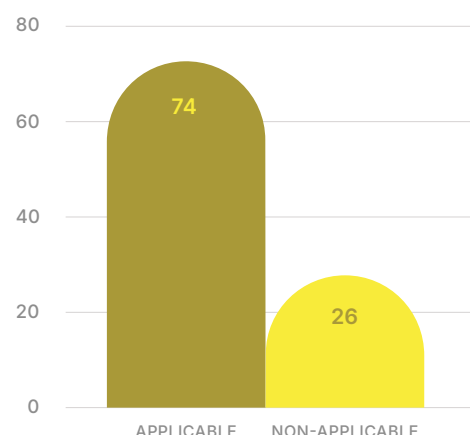


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Grievances Handled

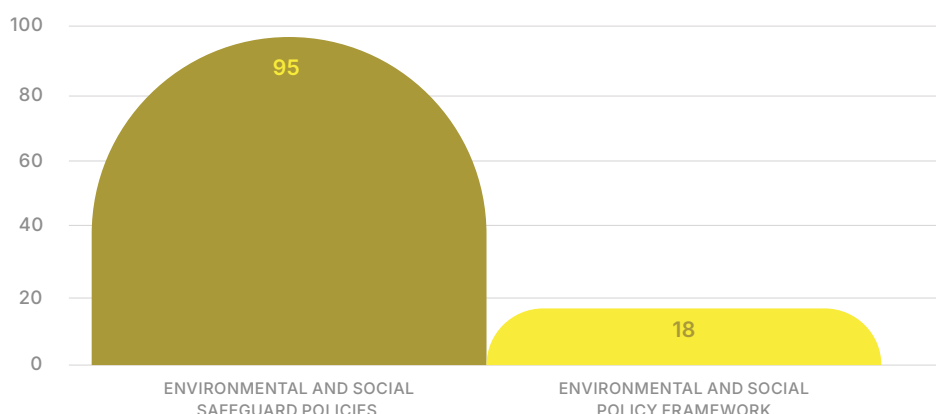
In 2025, during the fourth year of the Protocol, the IDB received 100 individual grievances, of which 74 were deemed applicable. In the same year, the Protocol handled 113 individual grievances, including 39 registered in previous years that remained active into 2025, as well as the aforementioned 74 new applicable cases in 2025. Of those 113 individual grievances, 23 were closed in 2025. The 26 grievances deemed to be non-applicable were either cases not related to environmental and social aspects, most of which were access-to-information requests that were transferred to the Bank's Access to Information Section (ATI), cases related exclusively to non-payments; anonymous cases; cases submitted 24 months after the last disbursement of the project; or cases unrelated to a project financed by the IDB.

TOTAL INDIVIDUAL GRIEVANCES RECEIVED IN 2025



Of the 74 new applicable grievances received and handled in 2025, half were presented by men and half by women (37 cases each). In addition, 38 cases (51 percent) of these 74 grievances were group grievances submitted by more than one person.

GRIEVANCES HANDLED IN 2025 ACCORDING TO APPLICABLE SOCIAL AND ENVIRONMENTAL POLICIES



Of the total number of grievances handled in 2025, 84 percent were related to projects approved under the IDB's previous Environmental and Social Safeguard Policies. However, 2025 saw a 6 percent increase in grievances handled that were related to

projects approved under the ESPF.

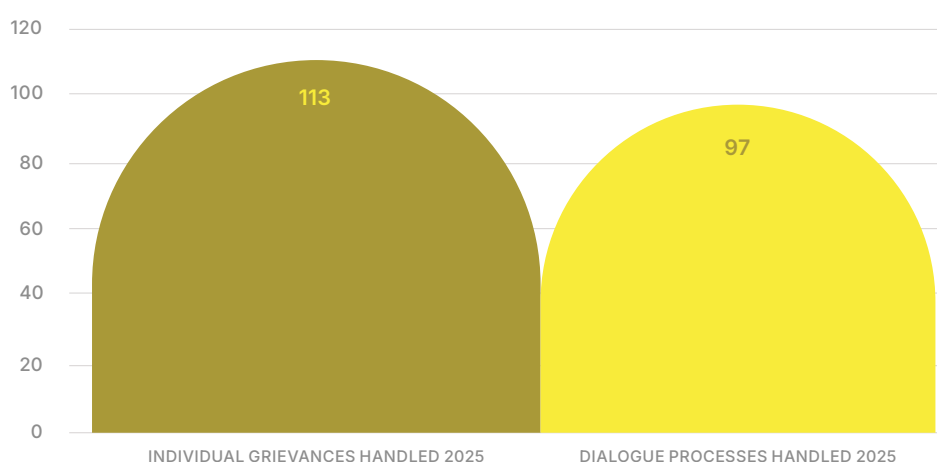
The total number of grievances handled by the IDB in 2025 represented a 69 percent increase over the number handled in 2024, which had already increased by 138 percent over 2023.

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This could be a consequence of increased internal dissemination of the Protocol within IDB Country Offices and IDB Sectors, and because departments facilitated the transfer of grievances submitted to the IDB through channels other than those specifically established under the Protocol.

The Protocol classifies grievances according to whether they are individual grievances or are managed as part of a dialogue process. A dialogue process may address one or multiple grievances submitted by complainants on a similar topic. Such a grouping is made with the complainants' authorization and/or by the complainants' request.

INDIVIDUAL GRIEVANCES AND DIALOGUE PROCESSES HANDLED IN 2025



Submission Channels

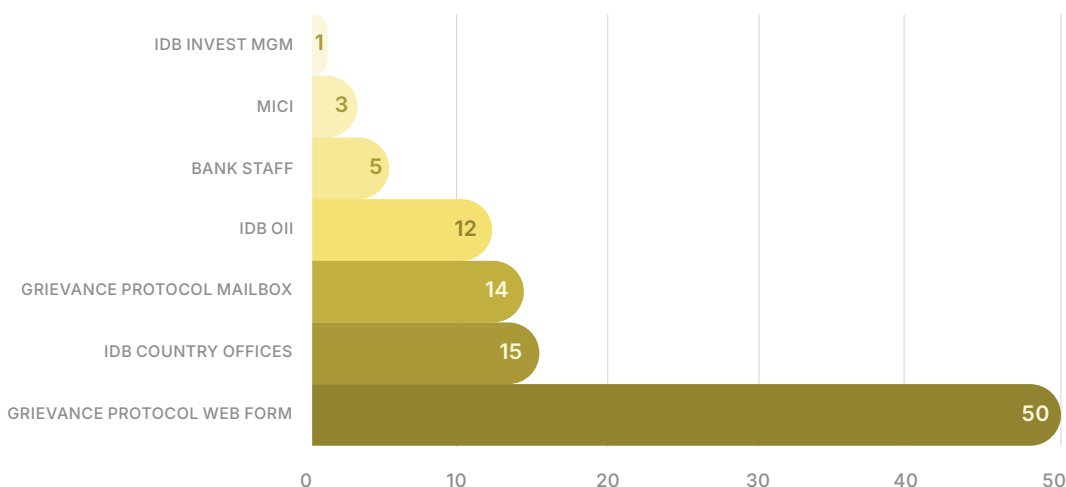
In 2025, 50 percent of total grievances were filed by complainants via the IDB's online grievance [web form](#), followed by the filing of grievances to IDB Country Offices either by mail or letters (15 percent) and the submission of grievances via the Grievance Protocol mailbox (quejas@iadb.org) (14 percent). Complainants filed 12 percent of grievances by contacting the Office of Institutional Integrity (OII), which then transferred them to the Protocol.

The OII mainly transferred workplace-related grievances, as these matters fall outside of the OII's scope. Five percent of grievances were filed by complainants contacting IDB staff and 3 percent by contacting the MICI. Finally, 1 percent of grievances were filed to the IDB Invest's Management Grievance Mechanism (MGM).

Grievances can be submitted by any means, including but not limited to the channels mentioned above.

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TOTAL GRIEVANCES SUBMITTED BY CHANNEL IN 2025



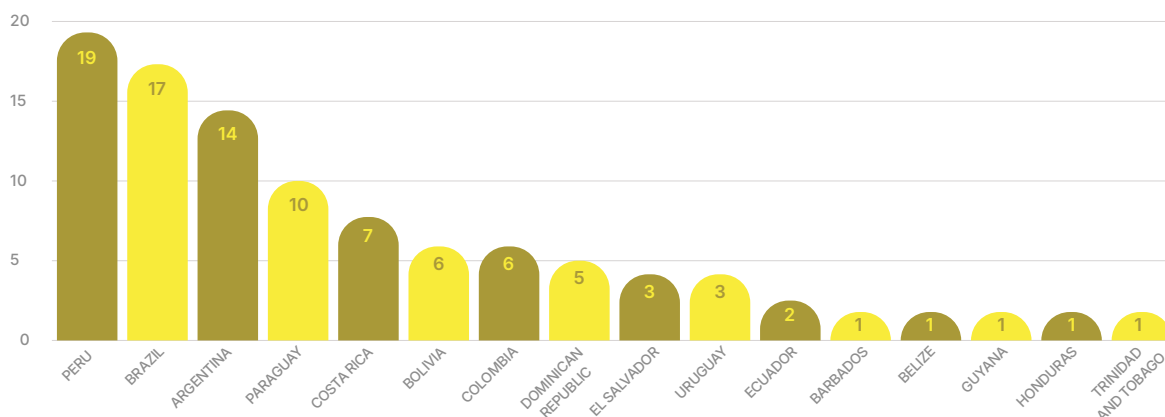
Geographic Location

Most dialogue processes for grievances handled in 2025 involved IDB-financed projects in the Southern Cone Region (44 cases), followed by the Andean Region (33 cases), the Central America Region (17 cases), and the Caribbean Region (3 cases)¹. During 2025, Brazil, Ecuador, and Honduras accounted for the largest number of approved projects². It is worth noting that the Southern Cone Region, which accounted for the most grievance dialogue processes handled in 2025, also accounts for the largest share of IDB-financed projects in execution.

Peru accounted for 20 percent of total dialogue processes handled in 2025, followed by Brazil (18 percent) and Argentina (14 percent). The number of grievances handled related to projects in the Caribbean Region has been steadily increasing since 2024, when the Protocol received its first grievance from this region.

Regarding the geographic location of total individual grievances handled in 2025, most were related to Argentina, which accounted for 24 percent, followed by Peru (17 percent) and Brazil (15 percent).

DIALOGUE PROCESSES HANDLED BY COUNTRY IN 2025



¹The Southern Cone Region includes Argentina, Brazil, Chile, Paraguay, and Uruguay. The Andean Region includes Bolivia, Colombia, Ecuador, Peru, and Venezuela. The Central America Region includes Belize, Costa Rica, the Dominican Republic, El Salvador, Guatemala, Haiti, Honduras, Nicaragua, Mexico, and Panama. The Caribbean Region includes The Bahamas, Barbados, Guyana, Jamaica, Suriname, and Trinidad and Tobago.

²Only loans, guarantees, investment grants, grant funding, and technical cooperation programs were considered.

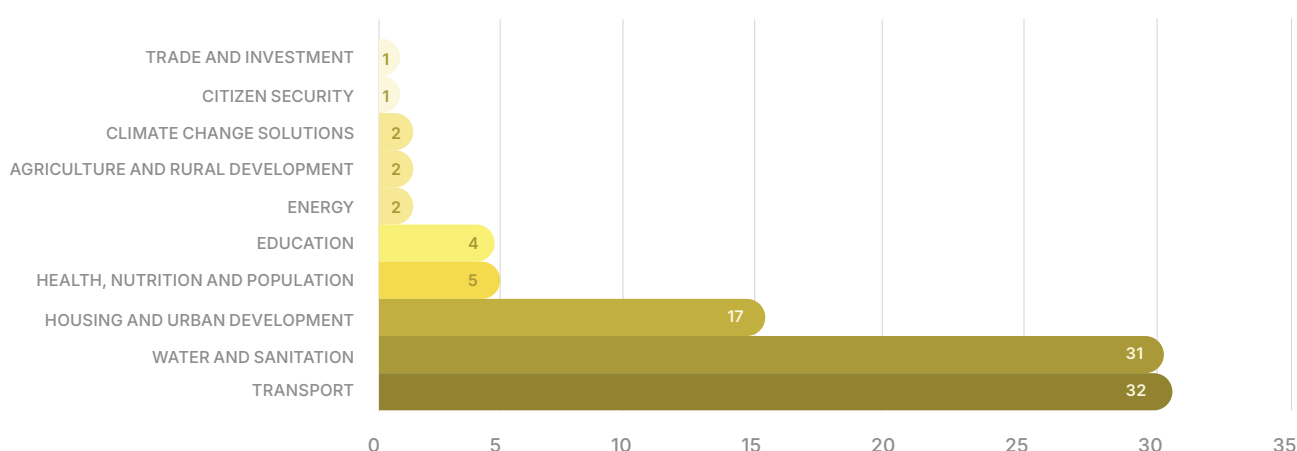
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Sectors

Transport was the sector with the most handled dialogue processes in 2025, accounting for 32 of the 97 total dialogue processes handled. The Water and Sanitation Sector followed with 31 dialogue processes, and the Housing and Urban Development Sector with 17 dialogue processes. The Health, Nutrition and Population Sector had five

processes, the Education Sector had four, and the Energy Sector and Agriculture and Rural Development had two processes each. Finally, the Climate Change Solutions Sector had two dialogue processes (one of them related to the Biodiversity and Natural Capital Unit and the other to the Disaster Risk Management unit), and the Citizen Security and Trade and Investment Sectors had one each.

DIALOGUE PROCESSES HANDLED BY SECTOR IN 2025



Related projects

Of the total individual grievances handled in 2025, 93 percent were related to active projects (105 of 113). Eight individual grievances were related to closed projects. Regarding the type of Bank-financed projects, 94 percent of total individual grievances handled in 2025 (106 of 113) were related to loan projects, 4 percent (5 grievances) to investment grants, and 2 percent (2 grievances) to technical cooperation programs.

Most projects with individual grievances handled in 2025 have substantial

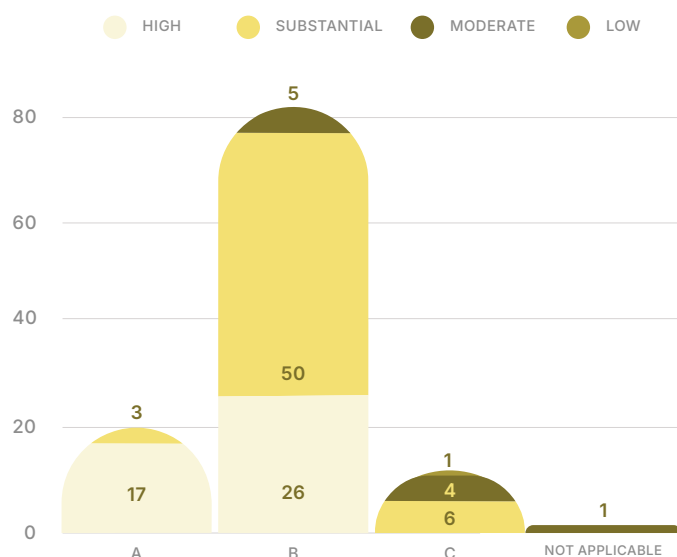
environmental and social risks (35 projects with 59 related grievances) and environmental and social impact category B (50 of 59 individual related grievances).

This is followed by projects with high environmental and social risks (22 projects with 43 related grievances) and environmental and social impact category B (26 grievances). Next are projects with moderate environmental and social risks (seven projects with 10 related grievances), and environmental and social impact category B (five grievances). Finally, one grievance was handled involving an environmental and social category C project with low environmental and social risks³.

³The four-level risk rating assigned to projects by the IDB (low, moderate, substantial, or high) is reassessed throughout the project cycle and adjusted in accordance with the developments and circumstances of the project's implementation.

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INDIVIDUAL GRIEVANCES HANDLED BY PROJECT ENVIRONMENTAL AND SOCIAL RISK CLASSIFICATION AND ENVIRONMENTAL AND SOCIAL IMPACT CLASSIFICATION IN 2025



Note: The not-applicable case refers to a technical cooperation project to which the Environmental and Social Policy Framework does not apply, therefore no Environmental and Social Impact Category or Environmental and Social Risk Rating was assigned.

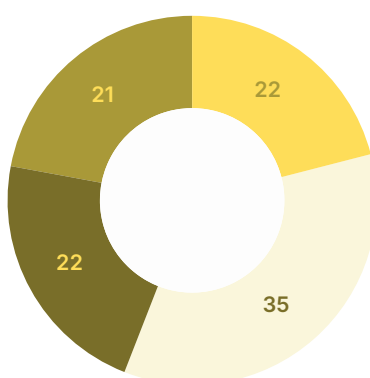
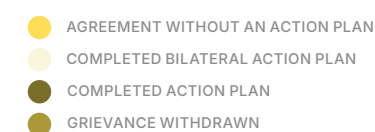
End-of-Year Snapshot

The figure below presents the grievances closed during 2025, when 23 individual grievances were closed⁴, of which 13 had been registered in 2024, and 10 in 2025. Of the 23 grievances closed, 13 (57 percent) were closed after their respective Grievance Action Plans were implemented, which included the implementation of regular Grievance Action Plans as well as Bilateral Grievance Action Plans for workplace-related grievances. In five grievance cases (22 percent), an agreement was reached with no Grievance Action Plan required. Five grievances (22 percent) were closed as a result of complainants withdrawing the grievance.

In 2025, no grievance was closed without agreement on a solution.

In 2026, 73 grievances remain active, with two under the applicability assessment, 51 of them continuing the dialogue process under the assessment and response phase and 20 continuing in the monitoring phase.

CLOSED INDIVIDUAL GRIEVANCES BY TYPE OF CLOSURE IN 2025 (PERCENT)



⁴Grievances closed as a result of lack of response from complainants are not included in the total number of grievances closed in 2025. Eighteen grievances were closed in 2025 due to lack of complainants' response.

Key Topics

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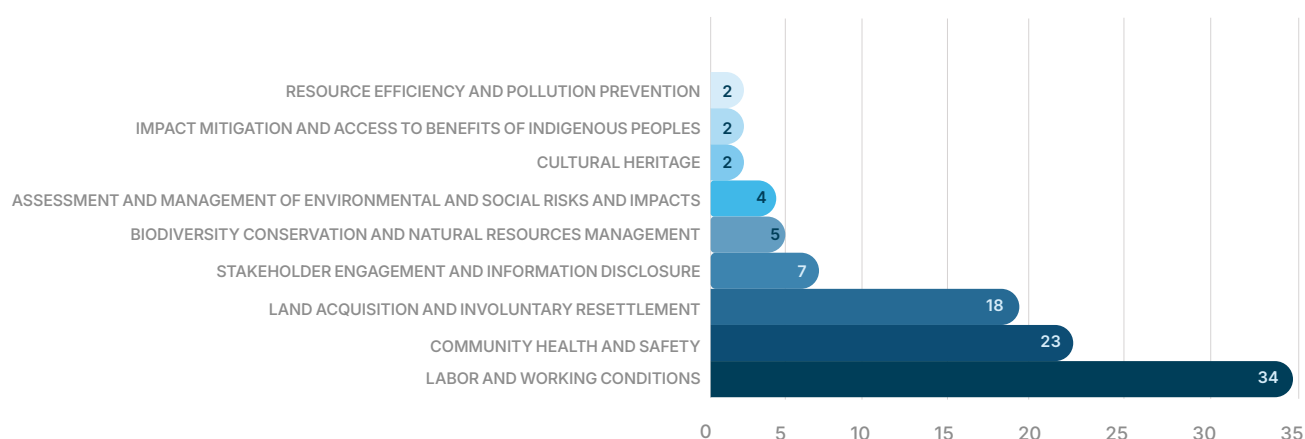
Key Topics

The most frequent topic among individual total grievances handled in 2025 was labor and working conditions, accounting for 30 percent (34 grievances) of total individual grievances handled across 19 projects in 10 countries. Community health and safety was the second-most frequent topic of individual grievances handled, with 29 percent (33 grievances) across 17 projects in seven countries. Eight of those 33 cases are related to a single project and constitute a single dialogue process. The third-most frequent topic of individual grievances handled was land acquisition and involuntary resettlement, with 16 percent (18 grievances). Eleven grievances were related to biodiversity and natural resources management, although eight of the 11 involved a single project and are classified as two dialogue processes. Stakeholder engagement and information disclosure accounted for seven grievance cases. Four cases were related to the assessment and management of environmental and social risks and impacts. Two cases each concerned cultural heritage, impact mitigation and access to benefits for Indigenous Peoples, and resource efficiency and pollution prevention.

Indigenous Peoples, and resource efficiency and pollution prevention. It should be noted that, despite categorizing grievances under a specific topic for simplification purposes, grievances often include a combination of key topics and subtopics, across which stakeholder engagement and information disclosure is a frequent cross-cutting theme.

Regarding total dialogue processes handled in 2025, labor and working conditions accounted for 35 percent (34 dialogue processes), followed by community health and safety with 24 percent (23 dialogue processes), and land acquisition and involuntary resettlement with 19 percent (18 dialogue processes). Stakeholder engagement and information disclosure accounted for seven dialogue processes, and assessment and management of environmental and social risks and impacts accounted for four. Two cases each concerned cultural heritage, impact mitigation and access to benefits for Indigenous Peoples, and resource efficiency and pollution prevention.

DIALOGUE PROCESSES HANDLED BY TOPIC IN 2025



Key Topics

Labor and Working Conditions

The number of total **work-related grievances** handled in 2025 increased by 79 percent over the previous year, which had already increased by 203 percent from 2023. These grievances have been the most frequent type of grievance handled for two consecutive years, surpassing land acquisition and involuntary resettlement, which had been the most frequent between 2021 and 2023. During 2025, the Protocol handled 34 workplace-related individual grievances, most of which were from the Water and Sanitation Sector (accounting for 56 percent of the total). All these grievances were presented by individual workers, which is why none of these grievances were classified as a dialogue process.

These grievances were primarily related to workplace harassment (56 percent), followed by non-payment of wages to workers (29 percent) and contract disputes, dismissals, and inadequate working hours (15 percent) in all subtopics involving workers at Executing Agencies and contractors. It is worth mentioning that grievances handled during 2025 related to non-payment of wages to workers were those that remained active prior to March 2025, when these types of grievance were excluded from the Grievance Protocol. Even though these grievances are no longer applicable, 15 percent of workplace-related grievances (involving both workplace harassment and contract disputes, dismissals, and inadequate working hours) include non-payment of wages as a subtopic (and therefore were included in grievance management).

Most of these grievances related to workplace harassment and contract disputes, dismissals, and inadequate working hours were submitted to the IDB Group through the OII (44 percent). Fifty-six percent of total workplace-related grievances were submitted by contractors' workers and the remaining (44 percent) from Executing Agency workers, both reporting hostile work environments, unfair treatment, and abuse of power, with instances where male superiors exerted their power over female employees (which accounted for 52 percent of total workplace-related grievances).

When managing grievances related to workplace harassment and contract disputes, unfair dismissals, and inadequate working hours, the Protocol team focuses on identifying and addressing underlying structural issues. The aim is to enhance social and environmental management and the workplace environment and to prevent future cases by ensuring that a system comprised of protocols, mechanisms, and tools is in place and effectively implemented in the Executing Agency, supervision firm and contractor firm. The IDB does not directly investigate the allegations raised in these grievances, instead requiring that Executing Agencies, contractors, or third parties financed by the IDB conduct them as part of the Bilateral Grievance Plan, then report the results of this assessment and/or evaluation back to the IDB along with potential corrective actions identified.

Workplace harassment cases carry a higher risk of retaliation, which is why complainants requested that the grievance be handled confidentially in 35 percent of the total number of cases. In 26 percent of grievances,

Key Topics

complainants did not submit their grievance to the project-level grievance mechanism before submitting it to the IDB because of a lack of trust in this mechanism, alleging that it failed to ensure confidentiality and ensure correct due process.

The assessment carried out has underscored the need to strengthen grievance management mechanisms at the project level in order to improve accessibility and effectiveness in addressing workplace-related grievances. This includes incorporating clauses on preventing and managing reprisals and ensuring confidentiality, as well as allowing both staff and consultants to access these mechanisms.

The Bilateral Grievance Action Plans are agreed upon between the Executing Agency and the IDB and implemented by the Executing Agency. Therefore, addressing these grievances involves the Executing Agency conducting assessments of the allegations raised, so these cases take longer to close than other types of grievances. Given that contractors and Executing Agencies may face challenges in consistently assessing and addressing this type of grievance, the IDB provides guidelines to support their implementation. These guidelines outline key aspects, including who should conduct the assessments, applicable timeframes, procedures, and provisions to ensure confidentiality and the protection of interviewees. Furthermore, the guidelines are applied depending on the nature of the allegations and whether they are directed at personnel from the Executing Agency, the supervision firm, or the contractor.

Challenges to address these grievances include (i) managing complainants' expectations regarding the scope of the Protocol and the results that could come out of the assessment regarding their specific allegations; (ii) engaging with Executing Agencies on confidential cases, as the specifics of such cases cannot be discussed and discussions must remain at a more abstract level, making it difficult to pinpoint concrete actions and impossible to conduct an assessment; (iii) handling cases when complainants were no longer part of the Executing Agency or contractor firms, as the complainant would not benefit directly from the structural measures implemented as a result of the grievance management process; and (iv) contextual issues such as constant institutional changes, including changes in the authorities at the Executive Agency. A specific case involving grievances in Peru constituted a challenge to follow up and implement measures to strengthen the management system and decision-making processes after evaluations were conducted due to these institutional changes.

The Protocol has been improved to take into account the importance of raising awareness about these types of cases, including by developing strategies to avoid re-victimization of complainants in listening spaces, identifying the need to develop guidelines to prevent reprisals, and effectively communicating the purpose and scope of the Protocol from the outset in order to manage complainants' expectations. This enables complainants to make an informed decision about whether or not to move forward with the grievance management process within the Protocol.

Key Topics

Assessments of these cases have highlighted the need to include, within Bilateral Grievance Action Plans, measures for Executing Agencies as well as contractors or subcontractors, when appropriate, to strengthen codes of conduct. These assessments have shown that such codes generally lack clear sanctions and corrective measures, as well as mechanisms to promote a healthy workplace environment. Accordingly, these Grievance Action Plans should also include measures such as regular workshops, surveys, and capacity-building efforts to support and sustain an adequate work environment.

Regarding active grievances related to non-payment of wages to workers submitted before March 2025, as part of the grievance management process the IDB project team followed up with the Executing Agencies to ensure payments were made, including by having Executing Agencies follow up with the contractor, when appropriate. These grievances, all of which were filed by contractors and external consultants either for withhold or delayed payments, impact the livelihoods of the complainants, underscoring the severity of the cases. While some grievances involving unpaid wages are indicative of broader systemic issues affecting multiple workers, others are individual cases where the Bank's role primarily involves facilitating the flow of information. In these cases, the resources of the Protocol could be more effectively directed toward situations where expertise and the ability to foster dialogue would provide greater added value. Despite the exclusion of these grievances from the Protocol, project teams are responsible for their management in order to ensure

compliance with IDB policies.

As of December 2025, 16 grievances related to labor and working conditions had been closed during the year. Eighteen grievances remained active in 2026 in the assessment and response phase.

Community Health and Safety

In 2025, 33 individual grievances and 23 dialogue processes were handled related to **community health and safety**, mainly in projects in Argentina and Peru, marking the first time this was the second-most frequent key topic in both handled individual grievances and dialogue processes. All dialogue processes regarding this key topic were concentrated in three sectors: 16 were related to transport projects, six to water and sanitation projects, and one to an energy project.

One dialogue process related to the energy sector in Honduras and two dialogue processes in Argentina and Ecuador related to the water and sanitation sector reflected the "not in my backyard" (NIMBY) phenomenon. In one case, residents opposed the installation of transmission lines near their homes, citing concerns about potential health impacts, decreased property values, and disruptions to sidewalk use. In the other two cases, the complainants, who were parents of children attending a school located near a waste management and transfer center, opposed the continuation of the center's operations, alleging health impacts related to odors and the presence of vectors.

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To address these concerns, the Executing Agencies, with support from the IDB project teams, explained in clear, non-technical terms that the transmission lines and the waste management and transfer center were located at a safe distance from complainants' homes and school, in accordance with national regulations and international best practices, and posed no health threat. Despite this, in the case of Honduras, opposition by a few families to the original transmission line route persisted, so the Executing Agency proposed an alternative route further away from the complainants' homes, carried out additional consultation and information dissemination processes with communities, and invested in strengthening its communications strategy with IDB financing. In the case of Argentina, opposition to the location of the existing waste management and transfer center persisted, based mainly on allegations of impacts on students' health. When complainants continued to demand that the plant be shut down or relocated, the Executing Agency developed and presented a Grievance Action Plan addressing health concerns regarding the operation of the center, and the IDB financed a third-party evaluation of the project to provide evidence that could help move the dialogue between the parties forward. As of December 2025, the dialogue was ongoing. Management of this dialogue process became further complicated due to the closure of the project, which had been fully disbursed at the time the grievances were submitted, and the absence of a counterpart as a result of institutional changes in Argentina.

These grievances underscore the importance of Executing Agencies communicating complex technical information in a clear,

accessible, and non-technical way. Moreover, in such cases it is essential that Executing Agencies explain the objectives, benefits, and scope of the project, ensuring that complainants understand its rationale. Information should be tailored to each group of stakeholders, as each group's situation and experience may differ from the others, especially regarding impacts. Also, consultation processes should be well-planned in advance and carried out throughout the project life cycle, with due time to consider feedback from affected parties and stakeholders. This is particularly important because many of these grievances are rooted in local concerns, may involve varying degrees of opposition, and involve local stakeholder groups often made up of a large number of people organized around shared, consensus-based issues. These grievances have also demonstrated a tendency to rapidly escalate from grievances to conflicts.

Opposition-related grievances have, in some cases, reflected perceptions of mistrust between parties, which may be related to the dynamics associated with the aforementioned not-in-my-backyard phenomenon. This perception may be influenced by asymmetric access to technical project information, such as environmental and social impact assessments, water monitoring data, or feasibility and alternatives analyses, as well as by differences in knowledge and the adoption of opposing, and sometimes antagonistic, positions. These dynamics can affect the ability of the parties to engage in constructive dialogue. In some cases, complainants have taken advantage of information gaps left by the Executing Agency by spreading misinformation.

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Ten dialogue processes (four in Costa Rica, four in Argentina, and two in Peru), all related to transport projects, addressed grievances concerning health impacts or nuisances affecting individuals and communities during road construction works. These grievances generally involved allegations related to dust management, pollution, odors, storm water drainage, and structural damage to residential homes, such as cracks.

In one grievance in Costa Rica submitted by a group of neighbors from the same family, the cited negative effects of road construction included alleged impacts on water drainage, visibility, and privacy of their properties, as well as temporary economic impacts on a family business located on one of the affected properties. In the two cases in Peru, the alleged impacts jeopardized the structural integrity of houses and the safety of complainants, blocked access to properties, and affected crops, which constituted the families' primary source of livelihood.

In Argentina, a group of neighbors alleged that construction works caused repeated interruptions in the drinking water supply due to pipe breakages, resulting in economic impacts on residents and tourism-related businesses. They also raised concerns regarding the lack of paving and maintenance of service roads and deficiencies in storm water drainage, road safety, and access to project information, as well as landscape impacts and the absence of community participation in project monitoring. Although some of these issues were directly related to the project, others, such as the provision of potable water to the neighborhood, were determined to be outside the scope of the project.

To address these types of grievances, a dialogue process was arranged between the Executing Agency and the complainants, with IDB facilitation, to develop Grievance Action Plans. These plans, implemented by the Executing Agencies, included measures such as providing safe access to affected properties; developing a strategy and process for more frequent and effective communication between the contractor, supervision teams, and local residents; and providing information on the institutions responsible for addressing concerns that fall outside the project's scope. Additional measures included implementing ongoing participatory odor monitoring, reinforcing traffic management plans, constructing a gabion wall to contain a landslide on one of the affected properties, increasing watering during paving works to reduce dust, and strengthening the grievance redress mechanisms at all project levels, particularly at the contractor and the Executing Agency. This last measure is particularly important, as many of these grievances are project-specific and could potentially be addressed more effectively by the contractor through an accessible grievance mechanism combined with sustained field presence and more visible communication channels that facilitate timely and effective responses.

As of December 2025, seven grievances related to community health and safety had been closed during the year. Twenty-six grievances remained active in 2026, one in the applicability analysis phase, 14 in the assessment and response phase, and 11 in the monitoring phase.

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Land Acquisition and Involuntary Resettlement

In 2025, the Grievance Protocol handled 18 individual grievances and dialogue processes related to **physical displacement** (relocation, loss of land, or shelter), and/or **economic displacement** (loss of land or assets, or restrictions on land use, assets, and natural resources). All these grievances were submitted in an individual capacity, so there is an overlap between the dialogue processes and the individual grievances handled. Of these grievances, 50 percent were from projects in Brazil.

Economic displacement related to allegations of inadequate compensation accounted for 33 percent of dialogue processes handled (six cases), mainly in projects in Colombia and the Dominican Republic. These grievances involved allegations of temporary economic impacts on businesses during construction as a result of delays in work schedules or a lack of measures included in the project's management plans, as the expectation was that these types of impacts would be avoided.

As part of the Grievance Action Plans, the Executing Agencies and contractors facilitated access to microcredit fairs and redirected competitive program funds to support business modernization and innovation, while also strengthening the program's grievance mechanism and communication channels. The Executing Agencies provided guidance to complainants on how to participate in fairs and local events to increase business visibility, including training on digital marketing, promotion of online food delivery platforms to boost sales, and information and assistance to

access institutional credit and business support programs. In addition, there was consistent engagement with complainants and other affected businesses to share updated construction schedules as works concluded during 2025, and to address emerging issues such as impacts on lighting or garbage collection.

These grievances require ongoing and effective monitoring and supervision, as they may directly involve the risk of impoverishment and affect livelihoods. Transparent information disclosure and continuous stakeholder engagement as the works progress, including regular updates on the construction schedule, also reduce potential risks of escalation. Several challenges emerged in managing these grievances, primarily due to the limited availability of tools and/or financial resources to provide compensation for alleged temporary impacts, which contributed to complainants' frustration and the escalation of grievances. The grievances have provided valuable lessons learned in the preparation of new programs, such as the need to include non-financial compensation measures in Resettlement Plans to support the transition of displaced economic activities; preventive measures to reduce temporary economic impacts as much as possible; and financial compensation measures as an option to deal with temporary economic impacts (to cover loss of profits), in case these impacts cannot be avoided.

Six dialogue processes (33 percent of total grievances and dialogue processes handled related to physical/economic displacement) were related to allegations of physical

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displacement involving inadequate resettlement assessments. In the case of an energy project in Paraguay, a group of residents opposed the installation of transmission lines near their homes, alleging inadequate property compensation values, together with environmental and biodiversity impacts. As of December 2025, the Executing Agency was reviewing the compensation methodology and had provided complainants and other relevant stakeholders with a formal response to biodiversity and environmental and social impact allegations, including further documentation and explanation about the environmental and social impact assessment.

In two cases in Brazil, affected stakeholders opposed resettlement because they disagreed with the government's decision and technical justification based on the results of disaster risk assessments regarding which people would be resettled from specific areas. After additional disaster risk assessments were carried out and completed in 2025 with additional IDB financing, the resettlement area was redefined by the Executing Agency, excluding these complainants and their families from the area. However, as of December 2025, as civil works for the development of housing units progressed, the complainants and their families had reversed their initial claims and requested to be resettled, highlighting the complex dynamics of grievances related to resettlement processes.

Four grievances were related to **physical displacement** allegations of **inadequate consultation processes** (22 percent of total grievances related to land acquisition and involuntary resettlement grievances).

Complainants stated that the Executing Agencies provided incomplete information prior to the resettlement process, particularly regarding the completion of works, delivery timelines for housing units, and temporary housing assistance payments. The absence or incompleteness of this information generated distrust among program beneficiaries and increased anxiety regarding the delivery of housing units. In these cases, the Grievance Action Plans included measures for the Executing Agencies to provide regular updates to complainants on construction progress, improving how technical information about the resettlement process is communicated and tailored to complainants, and deliver targeted support to beneficiaries regarding temporary housing assistance payments, relocation logistics, and utility installation.

Two grievances related to physical displacement involved allegations of inadequate compensation, mainly related to disagreements in compensation payments and amounts deemed insufficient. These are complex cases to resolve because they involved reviewing cadaster information and technical reports, and searching for additional compensation measures on behalf of the Executing Agency, when required. Delays in compensation payments may create considerable stress and inconvenience for affected people and complainants and may force them to incur additional costs. In one case in Brazil, challenges were mainly related to the lapse of time since the cadaster, as the family composition had changed, requiring updated measures for the complainant and their family. The Executing Agency carried out a thorough revision of the complainant's case and provided additional compensation

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measures for the complainant, in compliance with the program's criteria and regulations. The Executing Agency also provided guidance to the complainant on how to access alternative public programs to better access public policies aimed at providing health services to one of the complainant's family members.

In several cases related to compensation amounts, one of the main bottlenecks triggering grievances and their escalation to the IDB was the high expectations of complainants regarding an increase in compensation amounts. This, combined with delays in the delivery of housing units, may generate frustration and dissatisfaction among the population and become a source of conflict.

In general, grievances related to involuntary resettlement are individual cases that require a significant amount of time for both IDB project teams and Executing Agency teams to conduct case-by-case reviews, which may slow grievance management. Ensuring learning across cases, despite their specific and individualized nature, poses important challenges that the Protocol aims to address in coordination with project teams and Executing Agencies. One of the main challenges also relates to the significant time lapse between project preparation and execution, as some complainants in these cases may not have been identified as project-affected people during preparation of the Resettlement Plan. Lessons learned fed from the Protocol provided to project teams for their consideration during project preparation have included establishing an adequate and continuous stakeholder engagement process;

conducting reviews and updates of Resettlement Plans, cadasters, and baseline studies, when appropriate; including minimum budget estimates per measure and calculation methods in Resettlement Plans; defining and ensuring consistency regarding the maximum time frames to update the census and the conditions under which updates are required; and addressing unforeseen or accidental involuntary resettlement impacts such as structural damage to buildings caused by works (e.g., heavy machinery operations in structurally fragile contexts).

In 2025, four grievances related to physical and/or economic displacement were closed. Fourteen cases remained active in 2026, 10 in the assessment and response phase and four in monitoring.

Biodiversity Conservation and Natural Resources Management

In 2025, five dialogue processes were handled related to **biodiversity conservation and natural resources management**, specifically flora and/or fauna impact allegations, in Argentina, Barbados, and Brazil.

One project in Brazil accounts for eight individual grievances constituting two separate dialogue processes. One of these cases was submitted by members of a local environmental movement that included neighbors and interested parties. The complainants initially opposed the cutting of trees, specifically araucarias, to build a bus terminal and improve a bus line route in one of the city's avenue. Their argument was that it would compromise essential ecosystem services, such as climate regulation, air quality

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improvement, temperature control, and noise pollution reduction. In addition, complainants alleged a lack of adequate public consultation based on accurate information disclosed on the project's impacts.

As the dialogue process moved forward involving the Executing Agency, the Secretary of the Environment, with support from an external conflict mediator financed by the IDB, five dialogue spaces were held that resulted in agreements on a Grievance Action Plan. The plan included measures to address issues raised by complainants, such as adjustment of the roadway alignment; change of status from the Animation Axis to a Linear Park; removal of new sports and leisure facilities to avoid multiple tree removal; landscaping, structures, and vegetation designed to attract fauna; and promoting increased biodiversity and increasing soil permeability.

Other measures focused on strengthening the Executing Agency's communication and engagement channels with stakeholders—including local leadership and citizen movements, public transport system users, and business owners—by adding more dissemination channels such as a specific email address for stakeholders to engage with the Executing Agency, making it more accessible, and bringing on an additional social specialist to the Executing Agency's team. Efforts were also made to reinforce dissemination of the project's objectives to improve urban mobility by increasing passenger demand for public transit; improving system integration with complementary modes of transport; improving the efficiency of bus line operations; and improving the accessibility of pedestrians and

people with reduced mobility to stations and terminals.

This dialogue process highlighted the importance of developing secure and ongoing dialogue spaces to ensure that complainants are able to express their concerns, allow the Executing Agency to further clarify the scope of what could or could not be modified within a program, identify and prioritize issues raised, explain compliance with Bank policies, and identify whether conditions exist for dialogue between parties to proceed.

The other grievance in the same project in Brazil, which constitutes a separate dialogue process, was presented by neighbors and residents from another project intervention area. They alleged that there was a lack of adequate public consultation, opposed making a street one-way in their neighborhood, pointed to impacts of future works on vehicle flow, and presented concerns about environmental impacts of tree cutting and noise and pollution resulting from an increase in traffic flow. Several joint dialogues were held between the Executing Agency, complainants, and the IDB, which participated as an observer. But although the Executing Agency presented measures to address complainants' concerns, their opposition to the works persisted. As of December 2025, works in this area had not begun, and conditions for dialogue were under assessment to determine the best way to move forward.

For both sets of grievances, environmental concerns such as tree cutting and soil impermeability were significant. At the same time, limitations in the communication and engagement channels between the Executing

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Agency and stakeholders appear to have contributed to information gaps regarding the project. In the context of highly polarized municipal elections, a local movement used this gap to advocate for the issues it supported. In both cases, municipal council members were involved in the dialogue processes.

As of December 2025, four grievances related to biodiversity conservation and natural resources management had been closed during the year. Seven grievances remained active in 2026, two in the assessment and response phase and five in the monitoring phase.

Stakeholder Engagement and Information Disclosure

During 2025, seven grievances and dialogue processes handled were related to **stakeholder engagement and information disclosure** in projects in Belize, Brazil, the Dominican Republic, and Uruguay. These grievances were specifically categorized as being related primarily to this topic, but as mentioned previously, stakeholder engagement and information disclosure is a pivotal cross-cutting subtopic in all grievances handled. Despite grievances being related to other topics, complainants generally allege that they submitted requests for access to information that were not adequately addressed.

All grievances handled related to this topic specifically involved a lack of, or inadequate information disclosure. Complainants alleged that the program criteria, objectives, and scope, or work schedule were not readily available or clear for interested parties and

communities. Complainants also alleged that this affected their knowledge of the program and its works, creating false expectations and uncertainty.

In all cases, the Executing Agencies undertook a thorough process to better disseminate project information and make information more accessible through a variety of channels, including in-person periodic meetings, WhatsApp channels, and program websites. In addition, Executing Agencies strengthened the project-level grievance ecosystem, carrying out multiple training sessions for contractors and subcontractors as needed on stakeholder engagement and effective grievance management and reporting.

Challenges in handling these grievances are often linked to the fact that lack of timely and accessible information can contribute to mistrust among stakeholders and complainants. Even when the root cause of a grievance is tangible (e.g., dust pollution, noise, displacement), insufficient updates or technical explanations may heighten tensions before and during grievance management.

In several cases, limited access to relevant program information has led claimants and other stakeholders to seek recourse through judicial or administrative mechanisms, filing rights of petition or habeas data along with other legal and judicial instruments. In addition to maintaining continuous stakeholder engagement and information disclosure throughout the project life cycle, experience handling grievances has highlighted the importance of reinforcing these efforts at specific stages of the project life cycle, particularly before the start of works or in the

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event of delays. Significant delays, especially when not accompanied by clear, technical, and justified explanations or an updated work schedule, have contributed to the emergence of grievances. In active cases, gaps in timely communication have at times increased stakeholders' concerns and uncertainty, potentially exacerbating tensions and conflicts.

As of December 2025, four grievances related to stakeholder engagement and information disclosure had been closed during the year. Three grievances remained active in 2026 in the assessment and response phase.

Assessment and Management of Environmental and Social Risks and Impacts

In 2025, four grievances and dialogue processes submitted were related to the assessment and management of **environmental and social risks and impacts** in projects in Argentina, Brazil, and Ecuador.

These grievances are mainly related to allegations of an inadequate environmental and social assessment process and/or inadequate quality of management plans, including allegations of lack of analysis of alternatives, technical flaws, and omission of stakeholders in Environmental and Social Impact Assessments.

In one case, a heterogeneous group of complainants comprised of lawyers, property owners of the future wastewater treatment plant (WWTP) site, environmental organizations, local residents, and political party members opposed the location of the

future WWTP plant. They alleged that there was insufficient technical evidence for the selected location and no robust analysis of alternatives, and they expressed concerns that the project would alter the wetland ecosystem, impact cultural and archeological heritage, and cause potential impacts on endangered species and cultural landscapes of the valley. The Executing Agency, within the framework of a dialogue process facilitated by the IDB that included an IDB field visit to the site at the request of the complainants, provided information on the process to develop the alternatives analysis and site selection, as well as responses to the questions previously submitted by the complainants. As a result of the dialogue process, the Executing Agency agreed with the complainants to expand the alternatives analysis to evaluate other potential sites for the location of the WWTP based on a series of criteria previously defined. The analysis was to be carried out in a participatory manner and in coordination with the Municipal Decentralized Autonomous Government (GAD by its acronym in Spanish, the entity responsible for territorial planning). As of December 2025, socializing these criteria were being disseminated with complainants and starting the new analysis of alternatives process were pending.

In another case, the complainants, a group of four families represented by their lawyer, opposed the development of a stabilization pond. They argued that there was insufficient stakeholder engagement and lack of information disclosure with the residents at the pond location, expressed concerns regarding environmental and health impacts, and alleged that the amounts offered for the land acquisition were below market value. As the

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grievance management process progressed, land acquisition values were highlighted as the key issue for complainants and thus prioritized. The Municipal Decentralized Autonomous Government (GAD) commissioned a property appraisal for the properties in question to initiate a negotiation process with the complainants, along with other actions required by the team in the framework of compliance with IDB policies, such as reviewing the project's Resettlement Plan. As of December 2025, these negotiations were still pending.

Proposed waste management and resource recovery projects, primarily infrastructure financed by the water and sanitation sector, are often subject to a high degree of scrutiny from surrounding communities where these facilities are planned. These grievances tend to be particularly complex to handle because local opposition is often associated with NIMBY dynamics; frequently grounded in perceptions that site selection processes lack transparency or appear arbitrary and may not reflect a broader public interest; and involve concerns that building the infrastructure may generate collective impacts affecting health and quality of life, including odors, particulate matter emissions, potential degradation of public spaces, and ecological assets. Such disputes are often embedded in broader contexts of limited trust and diverging perspectives among the stakeholders involved, which can further complicate engagement and grievance resolution processes.

All these grievances included allegations regarding the lack of access to and dissemination of technical information, such as

studies on contaminants, monitoring, alternatives analysis, or water treatment capacity. Limited access to information may exacerbate existing asymmetries of knowledge among stakeholders, thereby complicating technically grounded dialogue and the possibility of reaching agreements, both of which are essential for the early resolution of grievances. In several cases, complainants sought access to information through judicial channels following perceived limitations in the information provided by the Executing Agency. Moreover, multiple grievances have shown that information gaps created by Executing Agencies may at times be leveraged by certain complainants or third parties to introduce their own data or interpretations of project impacts, which can contribute to confusion or the spread of misinformation among stakeholders, beneficiaries, or infrastructure users not directly involved in the grievance process.

This asymmetry of information often results in grievances characterized by moderate-to-high levels of distrust between parties, which in turn can hinder dialogue. Opposition and/or NIMBY-related cases are typically marked by greater complexity and uncertainty, involvement of multiple actors with divergent interests, rapid escalation of local disagreements into broader social conflicts, and a tendency to evolve in a spiral, where small initial triggers generate significant tensions. In this context, asymmetries of information and power among stakeholders can reinforce perceptions of mistrust and unfairness, making technical exchanges particularly challenging, especially when positions become entrenched and shaped by prior assumptions, even in instances where

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technical evidence may not fully support such views.

As of December 2025, no grievances related to environmental and social risks and impacts had been closed during the year. Four grievances remained active in 2026 in the assessment and response phase.

As of December 2025, both grievances related to cultural heritage had been closed. No grievances related to the topic remained active in 2026.

Cultural Heritage

Two grievances handled in 2025 were related to **cultural heritage**. Both involved the same project in Bolivia, which was approved by the country's National Assembly at the end of 2025. The project is in the area where a railway track was built in the early 20th century and therefore overlaps the railway's heritage site.

In both grievances, complainants expressed concerns about the project's intention to remove the rails and tracks from the railway system. They also alleged that relevant aspects of the national and municipal cultural heritage regulations were omitted both in preliminary studies and engineering design.

The Executing Agency completed and documented the analysis of the railway cultural heritage, alternatives, and cultural heritage management together with an archaeological impact assessment and final design. The assessment included considerations to preserve railway cultural heritage, and presented the process and supporting evidence to complainants in a joint meeting where their questions were addressed.

Key Topics

Impact Mitigation and Access to Benefits of Indigenous Peoples

In 2025, two grievances were handled from Indigenous organizations related to **impact mitigation and access to benefits of Indigenous Peoples** in two projects in Paraguay and Peru.

In Peru, the complainants, who were members of an Amazon-based Indigenous organization, alleged that development of the business plans within the framework of the project to promote bio-businesses was carried out by third parties that, the complainants maintained, lacked knowledge of the land and context, and without authorization of the communal authority. The complainants asked that they be more involved in project design, definition, and execution. To address the grievance, the Executing Agency presented project progress to complainants and several other Indigenous organizations and federations. The Executing Agency also provided capacity-building on georeferencing processes and other tools within the project's framework, the development of business plans, and training on the project's grievance mechanism. Further efforts were promoted to ensure an easier understanding of the project and business and livelihood plans for Indigenous communities.

In the Paraguay case, the president and legal representative of an Indigenous community alleged that the project directly and indirectly affects the community and stated that they had expressed their lack of consent to the project to various state authorities, including the Executing Agency, Public Prosecutor's Office, National Directorate of Public

Procurement, National Indigenous Institute, and other ministries. Complainants also alleged that the Indigenous community was suffering from cumulative impacts resulting from several government programs, many of which are not financed by the IDB; that the project's Indigenous Development Plan did not include training for the community on issues of their interest; and that the training was not delivered by culturally appropriate trainers. An initial listening space was organized where complainants agreed to present a proposal to the IDB of their desired training within the framework of the project's Indigenous Development Plan and other pending information. After several follow-up attempts by the Protocol, as of December 2025, no reply had been received from the complainants.

As of December 2025, one grievance related to impact mitigation and access to benefits of Indigenous Peoples had been closed during the year. One grievance remained active in 2026 in the assessment and response phase, awaiting the complainants' response.

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Resource Efficiency and Pollution Prevention

Two grievances handled in 2025 were related to resource efficiency and pollution prevention, one in Argentina and the other in Paraguay.

In one case, the complainant alleged that the contractor, in the context of track replacement works at a train station, caused environmental impacts to a park, affecting its vegetation cover, soil, and trees, because the park was used for storing materials and machinery, incorporated non-vegetated soil for restoration purposes, lacked proper leveling, and increased the risk of water accumulation. The complainant also alleged that, due to inadequate management of the works by the contractor, access points and pedestrian pathways deteriorated, preventing safe transit. To address the grievance, parties agreed on a Grievance Action Plan to be implemented by the Executing Agency that included restoration of the sections used for machinery access, readjustment of the strip designated for vehicle parking (in areas affected by the entry and exit of machinery), installation of temporary removable bollards, rehabilitation of the bike lane and pedestrian pathway (in order to repair the two affected patches), reforestation of six trees, ballast cleaning, and addition of fertile soil to areas presenting uneven surfaces.

In the other case, complainants, representatives of a neighborhood committee, expressed their disagreement with the project's acquisition of metal containers for waste management. They alleged that these containers are not suitable for community use,

as their use promotes the accumulation and dispersion of waste and contributes to the contamination of a channel. When the grievance was submitted, the Executing Agency was overseeing a consultancy on solid waste management that included recommendations to the municipality, the institution responsible for waste management, for its consideration and adoption. These recommendations included the suggestions expressed by the community and neighborhood groups, including the complainants. As of the end of 2025, the presentation of these findings to the municipality and subsequently to the community was pending.

As of December 2025, one grievance related to resource efficiency and pollution prevention had been closed during the year. One grievance remained active in 2026 in the assessment and response phase.

Case Study

IDB Environmental
and Social Grievance
Protocol

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Case Study

In June 2025, a grievance was submitted to the IDB Grievance Protocol regarding a water and sanitation program in Brazil. The complainant expressed concerns about the alleged suspension of construction works and the lack of clear information on the construction schedule and delivery of housing units planned as part of the program, which were necessary to complete the resettlement process of the complainant and their family. The complainant also alleged that the monetary value received as temporary housing assistance was insufficient to cover rental costs in areas close to the intervention site, a situation that would be exacerbated from November onward due to the hosting of a major international event.

In addition, the complainant argued that high expectations had been created following the symbolic delivery of certificates by the previous municipal administration, as the documents indicated that he and his family would receive their new home in April 2025, which did not happen. The complainant said that the complainant and their family were inadequately informed after the newly elected administration disregarded these certificates, leading to greater uncertainty regarding their situation, and highlighted their frustration with the lack of updated information from the Executing Agency about the status of the project and the expected delivery date of the housing units.

TIMELINE OF THE GRIEVANCE MANAGEMENT PROCESS

February to June, 2025	Registration of the grievance with the project-level grievance mechanism and meetings held between the Executing Agency and the complainant
June 27, 2025	Registration of the grievance by the IDB Grievance Protocol
July 9, 2025	First listening session held by the IDB with the complainant
July 22, 2025	First meeting between the IDB and the Executing Agency to share information on the grievance and define next steps
August 4, 2025	First dialogue session between the Executing Agency, the IDB, and the complainant and their family to provide a response to the grievance
August 8 to September 2, 2025	The Executing Agency submitted the Grievance Action Plan to the IDB after its content has been agreed upon with the complainant
September to October, 2025	Monitoring implementation of the Grievance Action Plan
October 17, 2025	The complainant and their family received the keys to their new housing units, and the relocation is carried out
October 28, 2025	Closure of the grievance under the IDB Grievance Protocol

As part of the Grievance Action Plan, the Executing Agency provided clear information on the progress of construction works, the reasons for delays, and the implementation schedule leading to the complete delivery of the housing complex. This included presenting the phased delivery plan and reassuring the complainant and their family of receipt of their permanent housing, as well as the

preservation of family ties through the allocation of all family units to apartments within the same building. To avoid communication gaps and potential conflicts with other resettled families, the Executing Agency explained in detail the technical criteria adopted to carry out the phased delivery of housing units, ensuring equitable treatment.

Case Study

The Executing Agency also:

- ✓ Conducted a monitored site visit for the complainant and their family to verify the progress of the civil works.
- ✓ Delivered the housing units built by the contractor and conducted a structural inspection with the support of the program's engineering team.
- ✓ Signed the resettlement agreements with the complainant and their family.
- ✓ Conducted a pre-resettlement orientation session and a workshop on community living rules for the complainant and their family.
- ✓ Completed apartment inspection checklists with the future residents.
- ✓ Conducted a housing handover event for the complainant and their family.
- ✓ Provided logistical support for the relocation.

Lessons Learned from the Case Study Grievance Management Process

➡ The grievance highlighted the importance of periodic, clear, and transparent communication regarding the progress of construction works and resettlement processes in order to mitigate community concerns and uncertainties. In cases of phased delivery of housing units, it is essential to explain to families the technical criteria used to justify the order of housing allocation and to translate the stages of the resettlement process into accessible language, given the presence of complex administrative and bureaucratic issues.

➡ Management of the grievance underscored the relevance of aligning the resettlement process with the development of construction works, avoiding premature displacement of families and economic activities, and, in turn, preventing social tensions, increased risk of impoverishment, irregular occupation by third parties of vacant properties, and higher program costs due to prolonged payment of temporary housing assistance.

➡ The grievance reinforced the importance of maintaining family, neighborhood, and social assistance networks during the resettlement process, recognizing their value for the better adaptation of families in the post-occupation phase as well as for the long-term sustainability of the relocation process.

➡ The grievance highlighted the importance of taking into account changes in municipal administration and other contextual risks (in this case, a major event in the city) while planning the resettlement process, ensuring the continuation of temporary assistance payments to affected people and the maintenance of constant communication with the project's social team during the process.

➡ Management of the grievance pointed to the importance of having an effective grievance mechanism at the project level that can respond to the demands of resettled persons in a timely manner and through multiple channels. It also reinforced the fundamental role of the Construction Oversight Committee in strengthening social participation and transparent communication with the Executing Agency and the contractor.

Four Years of the IDB Environmental and Social Grievance Protocol

IDB Environmental
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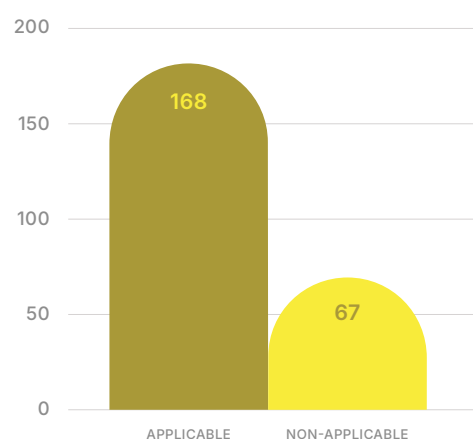
Four Years of the IDB Environmental and Social Grievance Protocol

Since the creation of the IDB Grievance Protocol in November 2021, the IDB has received a total of 235 individual grievances, of which 72 percent were applicable grievances (168 grievances). From November 2021 until 2022, the Grievance Protocol received 39 individual grievances (two of which were received in 2021), while in 2023, 20 grievances were received, 49 percent fewer than in 2022. However, 75 grievances were received in 2024, an increase of 275 percent compared to 2023. And in 2025, 100 grievances were received, an increase of 33 percent compared to 2024, consolidating the upward trend in grievances received since 2024.

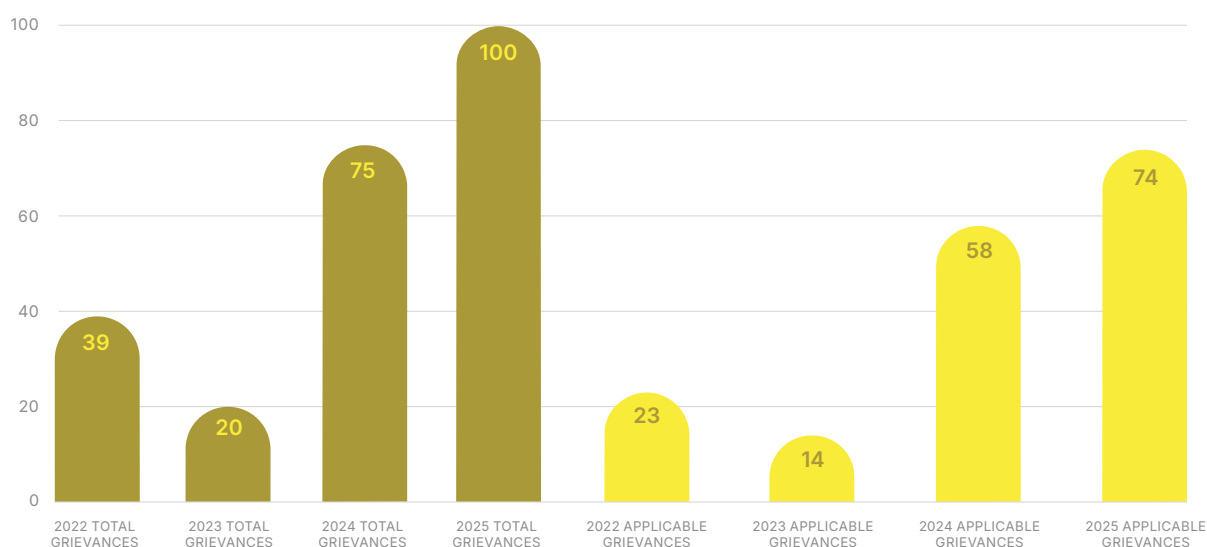
Regarding applicable individual grievances, one grievance was received in November 2021, 22 in 2022, and 14 in 2023, a decline of 39 percent from 2022. However, 58 applicable individual grievances were received in 2024, an increase of 314 percent over 2023. In 2025, 74 applicable grievances were registered, an increase of almost 28 percent over 2024.

This incremental trend in the number of grievances handled may be due to a variety of reasons, including increased internal IDB dissemination of the Protocol, encouragement of Country Offices or Project Team Leaders to transfer grievances received to the Protocol, and the political and social context of the region, where there is increasing scrutiny by citizens of institutions and multilateral banks and a growing awareness among citizens of their rights.

TOTAL NUMBER OF INDIVIDUAL GRIEVANCES RECEIVED, 2021- 2025



TOTAL NUMBER OF RECEIVED AND APPLICABLE INDIVIDUAL GRIEVANCES, 2022-2025



Note: Data for 2022 include two grievances received in November and December 2021.

Four Years of the IDB Environmental and Social Grievance Protocol

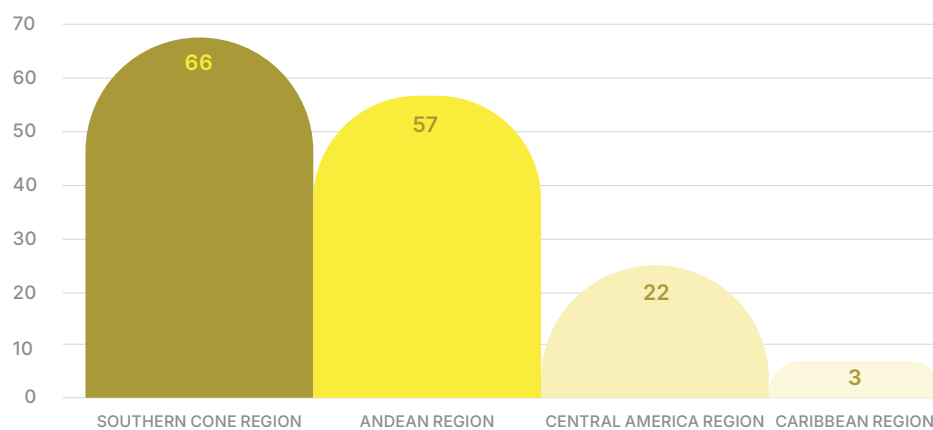
In nearly half of the cases for which data is available, the complainants first turned to the project-level grievance mechanism before submitting their grievance to the IDB. Complainants escalated their grievances to the IDB because their grievances were not addressed and resolved at the project level, and in some cases because of a lack of response from the Executing Agencies or contractors. As a result, a significant part of efforts by the Protocol and project teams have focused on identifying measures to strengthen the grievance mechanisms of Executing Agencies and contractors in aspects such as accessibility, reliability, and effectiveness.

Of the total number of grievances received since November 2021, 61 percent were filed by men and 39 percent by women. In addition, 36 percent of all grievances were group claims.

Also, since November 2021, 87 percent of grievances handled were related to projects approved under the IDB's previous Safeguard Policies, while 13 percent were related to projects approved under the IDB's ESPF. Of note, the number of grievances handled under the ESPF doubled from 2024 to 2025.

Since November 2021, the Southern Cone Region has recorded the highest number of dialogue processes, accounting for 45 percent of the total (66 cases), followed by the Andean Region with 39 percent (57 cases) and the Central America Region with 15 percent (22 cases). No grievances were received from the Caribbean Region in 2022 or 2023. However, in 2024 and 2025, three grievances were submitted from the Caribbean, one each from Barbados, Guyana, and Trinidad and Tobago.

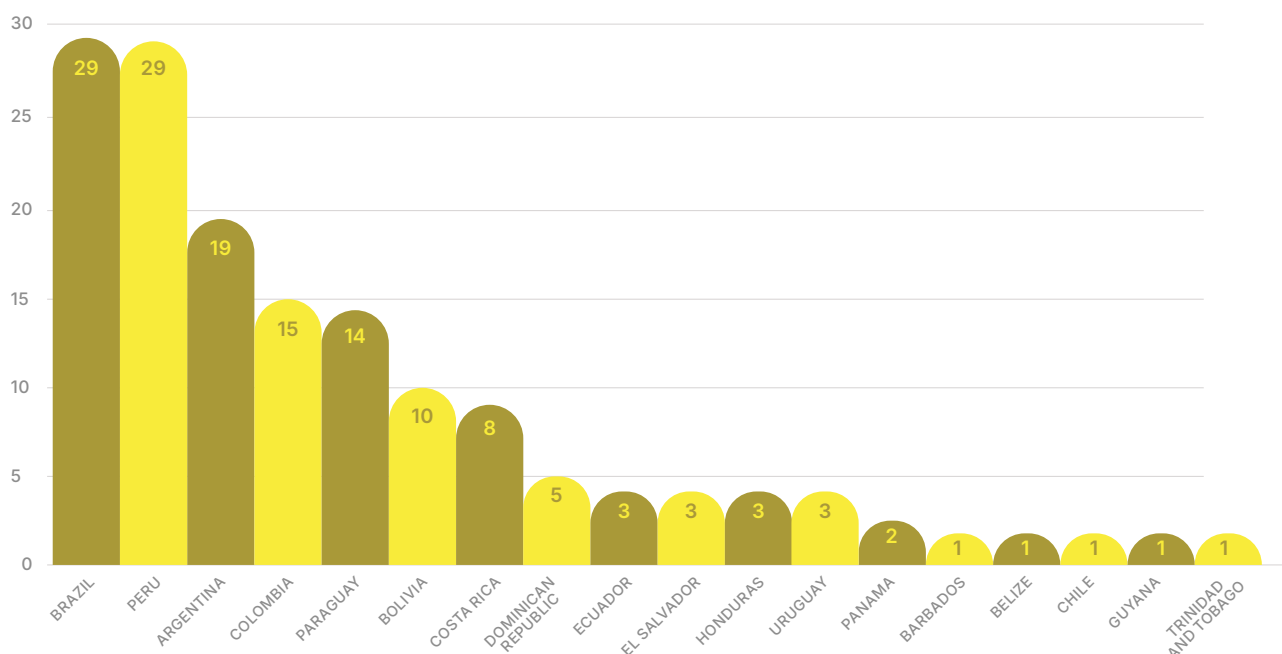
TOTAL NUMBER OF DIALOGUE PROCESSES HANDLED BY REGION, 2021-2025



Brazil and Peru each accounted for 20 percent of the total number of dialogue processes handled from 2021 to 2025 (29 processes each), followed by Argentina at 13 percent (19 cases) and Colombia at 10 percent (15 cases).

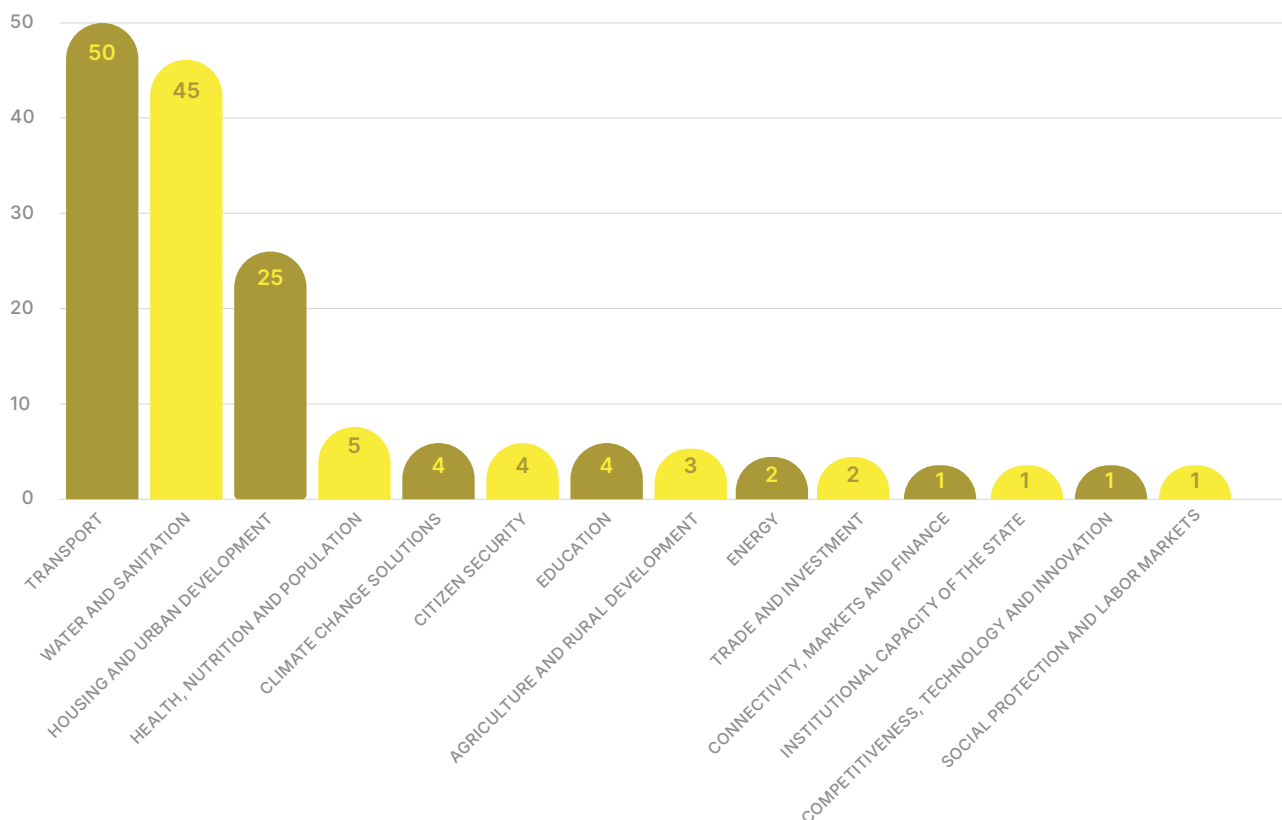
Four Years of the IDB Environmental and Social Grievance Protocol

TOTAL NUMBER OF DIALOGUE PROCESSES HANDLED BY COUNTRY, 2021-2025



From 2021 to 2025, the Transport Sector accounted for most of the dialogue processes handled, with 34 percent of the total (50 cases), followed by the Water and Sanitation Sector with 30 percent (45 cases) and the Housing and Urban Development Sector with 17 percent (25 cases).

TOTAL NUMBER OF DIALOGUE PROCESSES HANDLED BY SECTOR, 2021-2025

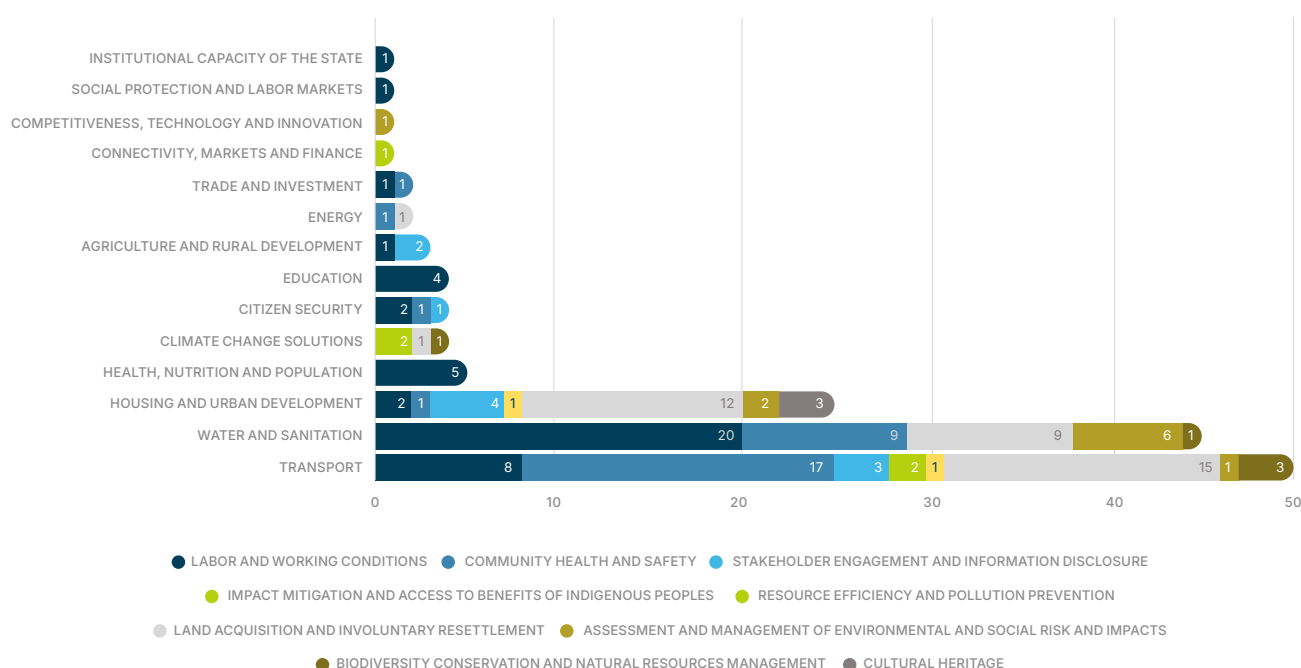


Four Years of the IDB Environmental and Social Grievance Protocol

From 2021–2025, the most recurrent dialogue process topic was labor and working conditions, accounting for 30 percent (45 cases) of total dialogue processes handled. This topic surpassed land acquisition and involuntary resettlement as the first topic from

all previous years. Land acquisition and involuntary resettlement accounted for 26 percent (38 cases) of total dialogue processes handled, followed by dialogue processes related to community health and safety with 20 percent (30 cases).

TOTAL NUMBER OF DIALOGUE PROCESSES HANDLED BY SECTOR AND TOPIC, 2021-2025



Most dialogue processes handled in the Water and Sanitation Sector were related to labor and working conditions, whereas most in the Transport Sector were related to community health and safety. Dialogue processes related to land acquisition and involuntary resettlement were mainly concentrated in the Housing and Urban Development and Transport Sectors. From 2021 to 2025, most of the dialogue processes handled related to assessment and management of environmental and social risks and impacts were related to the Water and Sanitation Sector, mainly because these dialogue processes generally involve opposition to the infrastructure financed by the sector, such as

wastewater treatment plants, landfills, or waste transfer centers, among others.

Between November 2021 and 2025, 39 percent of total individual grievances were closed with a completed Grievance Action Plan (which includes Bilateral Grievance Action Plans), and 31 percent were closed with an agreement between complainants and the Executing Agency (as well as contractors, when appropriate), without the need for a Grievance Action Plan. Another 22 percent were closed with no agreement reached between complainants and the Executing Agency. The remaining 8 percent were closed after complainants withdrew their grievances.

Four Years of the IDB Environmental and Social Grievance Protocol

Whenever grievances are closed with no agreement or complainants withdraw their grievance (once a dialogue process is under way), the Protocol informs the complainants of the possibility to turn to the MICI, as well as other state-based grievance mechanisms and legal or administrative mechanisms.

Since 2024, four individual grievance cases managed by the IDB Grievance Protocol—two of which were closed as “no agreement” and two of which saw the complainants withdraw during the grievance management process, presented their cases to the MICI and were deemed eligible. The difference in the number of cases reflects the fact that MICI does not process individual complaints in the same manner as the Protocol; in one instance, complainants from two separate Protocol cases joined together and submitted a single case to MICI. Of these three MICI cases, one is closed, and two are monitoring agreements reached in the consultation phase. All these cases reached an agreement in MICI’s consultation phase in an average time of 34 days after eligibility was declared. These results can be seen as evidence of the Protocol’s added value. Through coordinated work between Executing Agencies, IDB project teams, and the Protocol, grievance management advanced to a more mature stage, which helped facilitate agreements later in the MICI cases.

Lessons Learned

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Lessons Learned

The IDB Grievance Protocol is a channel for stakeholders to contact the IDB directly when they want to file a grievance about the environmental and social performance of Bank-financed projects. The aim of the Protocol is to promote dialogue between complainants and the Executing Agency to find solutions, when feasible, to the complainants' concerns. The solutions are to be implemented by the Executing Agency through Grievance Action Plans. In turn, the Protocol aims to strengthen the Executing Agencies' grievance and social and environmental management in IDB projects, with particular attention to the project-level grievance mechanism, based on lessons learned during grievance management.

In the four years since the Protocol began addressing grievances presented to the IDB, the Bank has compiled several lessons learned, both internally as part of the Protocol's processes and externally as part of engagement and dialogue with complainants, Executing Agencies, and contractors. In 2024, the Protocol team began implementing a lesson learned session with project teams after closing grievances. This session reflects on what has or has not contributed to identifying solutions for effective grievance management and how each case can strengthen project design and performance in terms of environmental and social aspects.

The subsections that follow present lessons learned on specific topics that have been identified since the creation of the IDB Grievance Protocol.

Strengthening Internal IDB Coordination

Engage the Protocol early. The chances for the Protocol to provide meaningful assistance and advice to IDB project teams in grievance management and resolution strategies decrease if a grievance has been handled by the project's Team Leader and/or other IDB internal stakeholders before reaching the Protocol. This is because relationships between the Executing Agency, complainants, and the IDB might have deteriorated, affecting the possible outcomes and resolution of the grievance and increasing the potential for grievances escalating into conflicts.

Grievance management has shown that addressing and resolving grievances promptly and building trust between parties requires early engagement and effective communication with the complainant as well as between the complainant and the Executing Agency. The exception to this is when grievances are confidential, or there are risks for complainants' safety or of their suffering reprisals. Grievances are generally time-sensitive, as delays in their handling can exacerbate stakeholder concerns, increase mistrust due to the lack of timely information or responses, and, in some cases, lead to escalation into formal or legal channels. For this reason, it is important to handle the resolution process in a way that promotes effective dialogue and does not fatigue stakeholders.

Promote internal dissemination, institutional consistency, and cross-fertilization across project teams when handling grievances.

Internal dissemination of the Protocol is key to

Lessons Learned

ensuring that all grievances submitted to the IDB through various channels (mainly letters and emails to Country Offices and Team Leaders) are transferred to and managed within the scope of the Protocol. This requires that IDB personnel know of, understand, and perceive the added value of the Protocol as a conflict-resolution tool.

The Protocol team focuses on internal coordination with IDB units, departments, and sections, including the OII, as well as the Bank's Access to Information Section (ATI), to ensure that social and environmental grievances received are appropriately transferred to the correct institutional channel. In addition, coordination and collaboration with other IDB departments, including the legal and communications teams, has been enhanced. In 2025, the Protocol team also focused on coordinating with sector and regional managers to increase the Protocol's internal buy-in. Furthermore, the Protocol has institutionalized a biannual exchange with the Environmental and Social Solutions Division (ESG) to share lessons learned and emerging trends from grievance management.

As the IDB has acquired more experience implementing the Grievance Protocol, it has increasingly used the knowledge accumulated by project teams and the Protocol. The aim is to strengthen and standardize the capacity of its personnel to prevent and manage social and environmental grievances and conflicts. This has been done by providing recommendations on recurring grievance patterns and trends during the project life cycle, and anticipating the responses and behaviors of stakeholders based on their positions and interests. Although grievances

often require analysis and discussion of technical information, a process led by the Executing Agencies and project teams, handling grievances commonly requires interpersonal exchanges and addressing emotions, as well as dialogue and negotiation skills. Not all environmental and social specialists have these skills. Therefore, the Grievance Protocol has provided project teams and Executing Agencies with support when carrying out dialogue processes, including recommendations on methodology and on ensuring continuous stakeholder engagement strategies during grievance management in order to prevent grievances from escalating into conflicts.

In addition, under the Protocol, the internal process through which grievance management is handled has been strengthened by incorporating the ESG chief, country representatives, chiefs of projects, and division chiefs, when appropriate, with the aim of providing more effective and timely responses to complainants and ensuring appropriate actions are taken to address grievances.

Promoting an Effective Grievance Management Process

Review the time frames for each stage of the grievance-handling process to ensure that they are suitable. The IDB aims to ensure that grievances are addressed expeditiously and efficiently. The Bank also recognizes that, in some instances, it may take time to build trust and consensus in dialogue processes led by the Executing Agencies, especially processes that involve many stakeholders with different, and sometimes even competing, interests and

Lessons Learned

needs. The variety of topics, countries of origin, and types of grievances submitted points to the need to implement the IDB Grievance Protocol in a flexible way in terms of approaches to engaging with complainants, the type of dialogue and conflict resolution tools employed, the timing of these processes, and providing predictability and security to the process and the complainants. This is key to being able to adapt the Protocol to different contexts and for the Executing Agencies to be able to reach implementable and realistic Grievance Action Plans and grievance resolutions to the satisfaction of stakeholders, as well as to promote the relevance of the Protocol within the IDB itself. In 2025, the Protocol team reviewed internal procedures to ensure that deadlines for different phases of the grievance process provide the needed flexibility and reflect current practice. In 2026, the Protocol team will continue reviewing bottlenecks to current grievance resolution time frames, both internally and externally, to ensure a more efficient grievance management processes.

Manage complainants' expectations. From the outset, IDB teams have learned the importance of managing complainants' expectations regarding resolution outcomes and clearly providing information to complainants about the different IDB and Executing Agency roles and responsibilities in grievance management. Starting with the first listening space held between the IDB and the complainant, it is important to clarify the scope of the Protocol and what can be expected as a grievance management outcome. Also, during the dialogue process led by the Executing Agency, it is important to clearly define which options are feasible and open for discussion,

as well as what the non-negotiable boundaries are. It must be kept in mind that the ultimate responsibility to act and implement solutions rests with the Executing Agency.

Identify when conditions for dialogue no longer exist. The Protocol aims to close grievances with an agreement or a Grievance Action Plan designed and implemented by the Executing Agency. However, grievances can be closed as well when no minimum conditions for dialogue exist and/or no resolution can be reached because complainants' positions are stalled. It is important to identify when all feasible efforts have been exhausted and whether continuing the dialogue would be counterproductive. When closing with no agreement, the Protocol informs the complainants about other alternatives such as the MICI or national or state legal or administrative channels. In these cases, the Protocol aims to document everything that was done within the Executing Agency's reach to promote dialogue, with the support of the IDB.

Develop best practices to handle grievances on specific topics. In cases of workplace harassment, for example, the Protocol emphasizes the importance of promptly informing the complainant about the objective and scope of the Protocol and clearly states that it does not validate or conduct assessments into the specific allegations raised. This approach ensures transparency regarding the Protocol's capabilities and limitations regarding this type of grievance, provides an outline of potential grievance management timelines, and sets clear expectations for possible outcomes. In addition, it encourages complainants to

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explore other available legal or administrative avenues for resolution, which may be pursued concurrently with the grievance management process of the Protocol.

Experience with the Protocol has underscored the significance of raising awareness about workplace harassment cases with Executing Agencies, developing strategies to prevent re-victimization of complainants during discussions, and effectively managing complainants' expectations by clarifying the Protocol's purpose and scope from the start as well as the role and responsibility in grievance management of the Executing Agency. Ongoing discussions involving the Protocol should also address the need to provide guidelines to prevent reprisals in the future.

For other types of grievances, such as those related to involuntary resettlement, lessons learned emphasize the need for better communication by Executing Agencies with complainants, particularly in conveying technical information in a more accessible manner to those potentially impacted by projects. The grievances handled have also highlighted the challenges that may arise when compensatory measures are not sufficiently defined, or when adequate resources are not allocated to the resettlement process during the early planning stages of projects. Moreover, there is an increased focus on incorporating non-financial compensation measures as part of the resolution process, particularly when these may contribute to more sustainable and acceptable outcomes for affected stakeholders.

Maintain open dialogue with complainants and ensure effective communication with the Executing Agency. Although actively engaging with complainants may require more time and effort from the IDB team than delegating this engagement to the Executing Agency, fostering dialogue remains the most effective tool to resolve grievances, prevent conflicts, and avoid escalation. Openness to dialogue by both the IDB and the Executing Agency is a prerequisite for the successful resolution of grievances.

In most cases, the Protocol facilitates dialogue between the parties and supports the Executing Agency on methodologies and strategies for dialogue processes. However, the IDB may also engage external support by hiring an independent expert to facilitate and mediate dialogue in order to strengthen the process to support the Executing Agency.

Support Executing Agencies in developing realistic and achievable Grievance Action Plans. While the responsibility for defining and implementing these plans rests with the Executing Agency, the Protocol can support this process by helping identify feasible actions and facilitating dialogue around potential response measures. The Protocol seeks to encourage the inclusion of both grievance-specific actions and broader measures to strengthen social and environmental management in Grievance Action Plans. At the same time, it is important that proposed actions remain realistic, clearly defined, and achievable within a reasonable time frame, ensuring that grievances are resolved during the project life cycle. This requires close coordination with the project teams to distinguish between actions that will

Lessons Learned

be part of regular social and environmental supervision and broader and systemic actions or commitments with the Executing Agency will be part of the Grievance Action Plan.

Strengthening Processes and Coordination with the Executing Agency

Strengthen project-level grievance mechanisms. In 29 percent of the grievance cases handled in 2024 and 2025, complainants filed their grievances directly with the Grievance Protocol without first contacting the project-level grievance mechanism. Complainants are not required to use the project-level grievance mechanism to access the Protocol. While complainants are not required to use project-level mechanisms prior to accessing the Protocol, the fact that Executing Agencies were sometimes unaware of grievances later submitted to the IDB may suggest that, in certain cases, these mechanisms were not sufficiently accessible, well-known, or perceived as effective in providing timely responses or satisfactory solutions. This may, in turn, discourage their use by affected stakeholders. In some cases, complainants may also have been reluctant to use project-level mechanisms due to concerns about confidentiality or fear of reprisals, especially when submitting confidential and whistleblowing grievances related to workplace harassment. Therefore, during the grievance management process, the IDB has focused on identifying opportunities to strengthen the grievance mechanism and management process of Executing Agencies and contractors. Specific areas for improvement have included the need for more

handling, adequate documentation of the grievance management process, and appropriate procedures and tools as well as monitoring measures to achieve sustainable agreements with the parties until compliance is achieved.

Ensure that the Executing Agency promotes effective handling of recurring grievances with the support of the Protocol. Two topics—grievances related to labor and working conditions and involuntary resettlement—accounted for 56 percent of the grievances handled in 2024 and 2025. The recurrence of themes and types of grievances points to the importance of systematizing processes, extracting lessons learned and best practices to prevent future grievances, and strengthening the Executing Agency's social and environmental management system to prevent such recurrences. The Protocol team works to encourage the exchange between IDB specialists and professionals in grievance management, as well as with Executing Agencies. Although grievances are often driven by concerns related to limited public participation, gaps in communication, on compensation values or perceived potential environmental and/or social impacts, they can also create opportunities for learning, innovation, and institutional improvement. These processes may contribute to strengthening the Bank's own environmental and social project preparation and supervision practices, while also encouraging Executing Agencies to review and enhance their internal procedures, protocols, and stakeholder engagement approaches.

Lessons Learned

Prevent escalation through effective grievance management. Conflict resolution skills are particularly important when addressing grievances related to social and environmental issues. Many grievances arise from concerns regarding actual or perceived environmental and social impacts, allegations of noncompliance with project procedures, dissatisfaction with stakeholder engagement processes, or opposition to the project itself. While the existence of grievances does not necessarily indicate the presence of an active conflict, delayed responses, insufficient communication, or limited opportunities for dialogue may contribute to the escalation of tensions among stakeholders. Grievances often involve differing perceptions, interests, and expectations among stakeholders, especially in cases where complainants oppose the project, distrust institutional actors, or have limited willingness to engage in dialogue or reach agreements. In such contexts, effective grievance management requires not only technical responses but also sustained communication, trust-building efforts, and clear management of expectations among the parties involved.

Strengthening the capacity of Executing Agencies in conflict resolution and fostering awareness about the significance of early intervention and effective dialogue can contribute significantly to more effective grievance management. In practice, Executing Agencies are often required to address not only individual grievances but also broader social and environmental tensions that may emerge during project implementation. Experience has shown that incorporating conflict resolution approaches and dialogue facilitation tools can help improve communication with stakeholders, reduce

mistrust, and create more constructive conditions for engagement. For example, in a case in Brazil where the grievance management process was supported by a conflict mediator, a workshop was organized with the Executing Agency to help strengthen institutional capacity related to conflict resolution and dialogue management.

Ensure active engagement with project teams and executing agencies in order to maximize the effectiveness of the Protocol.

Experience in grievance management has shown that grievances can serve as opportunities to strengthen environmental and social management at the project level when the Protocol works closely with project teams and Executing Agencies, providing feedback, recommendations on grievance handling and resolution strategies, and training on key topics such as grievance management and conflict prevention. The Protocol can also be a tool for capacity-building on grievance management and conflict resolution with Executing Agencies as has been shown by training on these topics with Executing Agency teams in Argentina, Honduras, Ecuador, and Brazil.

The Protocol has identified that a key enabling factor in grievance management is active communication and dialogue between the Grievance Protocol, the IDB project team, and the Executing Agency. This helps ensure a more timely and effective process, as well as the opportunity to jointly identify areas where executing agencies can strengthen grievance and conflict management. Lack of engagement with either of these parties has contributed to considerable bottlenecks and delays in grievance management.

Outreach and looking ahead

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Outreach and looking ahead

Efforts were made in 2025 to increase in-person dissemination of the IDB Grievance Protocol within the IDB Group itself, with a focus on prioritized IDB Country Offices and Sector and Country Departments and on Senior Management. In 2025, the IDB Grievance Protocol organized workshops in Ecuador, Costa Rica, Honduras, and Brazil. Together with similar initiative in 2024, these workshops and dissemination spaces involved approximately 460 IDB personnel. In 2025, the team also conducted internal workshops with the Environmental and Social Solutions Division and OII on the IDB Group Grievance Management System. The workshops focused on extracting best practices, challenges, and lessons learned.

Regarding external dissemination, the IDB Grievance Protocol website was updated to improve accessibility and provide more detailed information on the grievance management process and other IDB Group grievance mechanisms available. New brochures were also prepared that explain the grievance management process and phases and provide answers to frequently asked questions. In addition, the Protocol team, together with IDB Invest's Management Grievance Mechanism, hosted its annual virtual dissemination session for civil society organizations across Latin America and the Caribbean on October 7, 2025. Approximately 25 targeted organizations participated, including social and environmental nongovernmental organizations, think tanks, ombuds institutions, and Indigenous organizations, with representation from all four IDB regional hubs. The session was conducted in Spanish with simultaneous interpretation into English and Portuguese. To learn more

about IDB Invest's Management Grievance Mechanism, [click here](#).

In 2026, the Grievance Protocol team will focus on:

- ➔ Continuing to promote internal coordination and dissemination of the Protocol at the IDB in Country Offices and with Sectors.
- ➔ Promoting external dissemination with stakeholders and civil society organizations across the region to inform them about available IDB Group grievance channels.
- ➔ Improving grievance management times and continuing to promote dialogue through effective case handling, specifically in the assessment and response and monitoring phases, ensuring that Grievance Action Plans are feasible and attainable in a shorter time frame.
- ➔ Capturing lessons learned and promoting continuous improvement by systematically sharing these insights with project teams to strengthen social and environmental performance during project preparation and implementation.
- ➔ Working with the IDB more broadly to continue building the capacity and skills of its project teams on grievance management and social and environmental conflict prevention, resolution, transformation, and effective dialogue by providing information on trends, lessons learned, and tools.
- ➔ Engaging promptly with complainants using a risk-based approach to addressing grievances.

How to reach us

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How to reach us

The mission of the IDB is to improve lives in Latin America and the Caribbean with integrity and sustainability, so all its activities follow the highest environmental and social standards. The IDB Grievance Protocol team is available to explain the process of filing a grievance, as well as to receive environmental and social grievances or concerns about projects financed—or to be financed—by the IDB.

You can reach out to the IDB Grievance Protocol by:



Emailing us at quejas@iadb.org



Using our [online form](#)



Messaging or calling us at +1 (202) 826-3705



Mailing us at 1300 New York Ave NW, Washington, DC 20577
or any of the IDB's Country Offices.

Annex 1

Registry of
Grievances Received
and Handled in 2025

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Annex 1. Registry of grievances received and handled in 2025

While this annex lists all individual grievances handled in 2025, one project may involve several grievances with a similar or identical topic. The focus is on the grievances, not the projects.

ANNEX 1 REGISTRY OF GRIEVANCES RECEIVED AND HANDLED IN 2025								
GRIEVANCE NUMBER	DATE REGISTERED	COUNTRY	SECTOR	PROJECT NAME	PROJECT NUMBER	TOPIC	STATUS AS OF DECEMBER 2025	ISSUES RAISED AND ALLEGED
17784	1/13/2025	Colombia	Transport	Metro of Bogota First Line - First tranche	CO-L1234	Involuntary Resettlement and Land Acquisition	Assessment and Response	Economic displacement (temporary impacts on businesses during works)
17990	1/16/2025	Peru	Education	Program for the Improvement of the Quality and Relevance of University and Technical Higher Education Services at the National Level	PE-L1227	Labor and Working Conditions	Closed	Workplace harassment
17807	1/13/2025	Paraguay	Water and Sanitation	Sanitation and Water Supply for the Chaco and Intermediate Cities Program	PR-G1001	Labor and Working Conditions	Assessment and Response	Workplace harassment
17808	1/13/2025	Paraguay	Water and Sanitation	Sanitation and Water Supply for the Chaco and Intermediate Cities Program	PR-G1001	Labor and Working Conditions	Assessment and Response	Workplace harassment
17822	1/13/2025	Paraguay	Water and Sanitation	Sanitation and Water Supply for the Chaco and Intermediate Cities Program	PR-G1001	Labor and Working Conditions	Assessment and Response	Workplace harassment
17827	1/13/2025	Paraguay	Water and Sanitation	Sanitation and Water Supply for the Chaco and Intermediate Cities Program	PR-G1001	Labor and Working Conditions	Assessment and Response	Workplace harassment
18195	1/21/2025	Colombia	Water and Sanitation	Water, Basic Sanitation, and Electrification Program for the Colombian Pacific	CO-L1156	Labor and Working Conditions	Assessment and Response	Non-payment of salaries
18292	1/23/2025	Colombia	Transport	Metro of Bogota First Line - First tranche	CO-L1234	Involuntary Resettlement and Land Acquisition	Assessment and Response	Economic displacement (temporary impacts on businesses during works)
18391	1/24/2025	Dominican Republic	Health, Nutrition and Population	Dominican Republic - Regional Malaria Elimination Initiative (RMEI) in Mesoamerica and Dominican Republic	DR-G0002	Labor and Working Conditions	Closed	Non-payment of salaries
18757	2/4/2025	Paraguay	Energy	Expansion of the High Voltage Transmission System and Energy Efficiency Actions	PR-L1173	Involuntary Resettlement and Land Acquisition	Assessment and Response	Opposition to transmission line route due to alleged inadequate resettlement assessments and compensation, and environmental and biodiversity impacts
18910	2/4/2025	Dominican Republic	Housing and Urban Development	Comprehensive Tourism and Urban Development Program for the Colonial City of Santo Domingo	DR-L1084	Involuntary Resettlement and Land Acquisition	Monitoring	Economic displacement (temporary impacts on businesses during works)
19318	2/11/2025	Peru	Water and Sanitation	Project for Expansion and Improvement of the Water and Sewer Services of the City of Juliaca - Puno	PE-L1285	Labor and Working Conditions	Assessment and Response	Non-payment of salaries
20008	2/20/2025	Costa Rica	Transport	Cantonal Road Network II Program	CR-L1065	Community Health and Safety	Monitoring	Safety risks regarding slope bordering the river and a condominium that presented a risk of collapse

Annex 1. Registry of grievances received and handled in 2025

While this annex lists all individual grievances handled in 2025, one project may involve several grievances with a similar or identical topic. The focus is on the grievances, not the projects.

ANNEX 1 REGISTRY OF GRIEVANCES RECEIVED AND HANDLED IN 2025								
GRIEVANCE NUMBER	DATE REGISTERED	COUNTRY	SECTOR	PROJECT NAME	PROJECT NUMBER	TOPIC	STATUS AS OF DECEMBER 2025	ISSUES RAISED AND ALLEGED
20226	2/26/2025	Costa Rica	Transport	Road Infrastructure Program and Promotion of Public-Private Partnerships (PPP)	CR-L1139	Community Health and Safety	Monitoring	Allegations of loss of access to the property and impacts on drainage resulting in property damage from the works
20350	2/28/2025	Uruguay	Housing and Urban Development	Support Program for the Socio-Urban Integration of the Migrant Population	UR-J0001	Stakeholder Engagement and Information Disclosure	Closed	Lack or inadequate information disclosure on criteria to access the program's subsidies
21021	3/13/2025	Dominican Republic	Housing and Urban Development	Comprehensive Tourism and Urban Development Program for the Colonial City of Santo Domingo	DR-L1084	Involuntary Resettlement and Land Acquisition	Monitoring	Economic displacement (temporary impacts on businesses during works)
20974	3/13/2025	Costa Rica	Transport	Cantonal Road Network II Program	CR-L1065	Community Health and Safety	Monitoring	Lack of dust control during the works and lack of sufficient community engagement
21242	3/19/2025	Argentina	Transport	Project to Improve the Provincial Route 82 Corridor in the Province of Mendoza	AR-L1293	Biodiversity Conservation and Sustainable Management of Living Natural Resources	Monitoring	Allegations of damage caused by the works to an old grove of trees, an irrigation ditch, and a storm water drainage channel
21694	3/28/2025	Brazil	Transport	Curitiba's Sustainable Urban Mobility Program	BR-L1532	Biodiversity Conservation and Sustainable Management of Living Natural Resources	Monitoring	Opposition to the project due to environmental concerns related to tree cutting and lack of consultations, among other issues
23444	4/29/2025	Argentina	Water and Sanitation	Integrated Urban Solid Waste Management Program	AR-L1151	Community Health and Safety	Assessment and Response	Opposition to the location of the waste management plant and allegations of inadequate project due to impacts related to odors
23445	4/29/2025	Argentina	Water and Sanitation	Integrated Urban Solid Waste Management Program	AR-L1151	Community Health and Safety	Assessment and Response	Opposition to the location of the waste management plant and allegations of inadequate project due to impacts related to odors
22741	4/14/2025	Peru	Transport	Improvement Huanuco Road, Conococha Huanuco Sector - Huallanca PE - 3N Route Project	PE-L1151	Involuntary Resettlement and Land Acquisition	Assessment and Response	Allegation of inadequate resettlement assessment related to complainant's property
22291	4/8/2025	Peru	Water and Sanitation	Project for Expansion and Improvement of the Water and Sewer Services of the City of Juliaca - Puno	PE-L1285	Labor and Working Conditions	Assessment and Response	Non-payment of salaries
22292	4/8/2025	Peru	Water and Sanitation	Project for Expansion and Improvement of the Water and Sewer Services of the City of Juliaca - Puno	PE-L1285	Labor and Working Conditions	Assessment and Response	Non-payment of salaries
22320	4/9/2025	Costa Rica	Transport	Cantonal Road Network II Program	CR-L1065	Community Health and Safety	Monitoring	Unfinished street paving process causing inconvenience to residents
22852	4/15/2025	Peru	Water and Sanitation	Integrated Urban Solid Waste Management Program	PE-L1226	Labor and Working Conditions	Closed	Workplace harassment

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GRIEVANCE NUMBER	DATE REGISTERED	COUNTRY	SECTOR	PROJECT NAME	PROJECT NUMBER	TOPIC	STATUS AS OF DECEMBER 2025	ISSUES RAISED AND ALLEGED
23686	4/29/2025	Brazil	Education	Program Education for the Future of Paraná's state	BR-L1551	Labor and Working Conditions	Closed	Workplace harassment
23687	4/29/2025	El Salvador	Water and Sanitation	Program to Strengthen the Water and Sanitation Sector in El Salvador	ES-L1152	Labor and Working Conditions	Closed	Contract dispute regarding wrongful dismissal allegations
23691	4/29/2025	Uruguay	Housing and Urban Development	Support Program for the Socio-Urban Integration of the Migrant Population	UR-J0001	Stakeholder Engagement and Information Disclosure	Closed	Lack or inadequate information disclosure on criteria to access the program's subsidies
25623	5/23/2025	Argentina	Water and Sanitation	Integrated Urban Solid Waste Management Program	AR-L1151	Community Health and Safety	Assessment and Response	Opposition to the location of the waste management plant and allegations of inadequate project due to impacts related to odors
25626	5/23/2025	Argentina	Water and Sanitation	Integrated Urban Solid Waste Management Program	AR-L1151	Community Health and Safety	Assessment and Response	Opposition to the location of the waste management plant and allegations of inadequate project due to impacts related to odors
25667	5/23/2025	Argentina	Water and Sanitation	Integrated Urban Solid Waste Management Program	AR-L1151	Community Health and Safety	Assessment and Response	Opposition to the location of the waste management plant and allegations of inadequate project due to impacts related to odors
25670	5/23/2025	Argentina	Water and Sanitation	Integrated Urban Solid Waste Management Program	AR-L1151	Community Health and Safety	Assessment and Response	Opposition to the location of the waste management plant and allegations of inadequate project due to impacts related to odors
25671	5/23/2025	Argentina	Water and Sanitation	Integrated Urban Solid Waste Management Program	AR-L1151	Community Health and Safety	Assessment and Response	Opposition to the location of the waste management plant and allegations of inadequate project due to impacts related to odors
25678	5/23/2025	Argentina	Water and Sanitation	Integrated Urban Solid Waste Management Program	AR-L1151	Community Health and Safety	Assessment and Response	Opposition to the location of the waste management plant and allegations of inadequate project due to impacts related to odors
25147	5/19/2025	El Salvador	Water and Sanitation	Program to Strengthen the Water and Sanitation Sector in El Salvador	ES-L1152	Labor and Working Conditions	Closed	Contract dispute regarding wrongful dismissal allegations
26273	5/29/2025	Argentina	Water and Sanitation	Water and Sanitation Program for Metropolitan Areas	AR-L1162	Labor and Working Conditions	Closed	Workplace harassment
26731	6/4/2025	Argentina	Transport	Project to Improve the Provincial Route 82 Corridor in the Province of Mendoza	AR-L1293	Community Health and Safety	Closed	Request to modify the road alignment on the grounds that the removal of a roundabout and the introduction of new detours create increased risks for vehicles and pedestrians
26745	6/4/2025	Argentina	Transport	Project to Improve the Provincial Route 82 Corridor in the Province of Mendoza	AR-L1293	Community Health and Safety	Closed	Request to modify the road alignment on the grounds that the removal of a roundabout and the introduction of new detours create increased risks for vehicles and pedestrians

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26753	6/4/2025	Argentina	Transport	Project to Improve the Provincial Route 82 Corridor in the Province of Mendoza	AR-L1293	Community Health and Safety	Closed	Request to modify the road alignment on the grounds that the removal of a roundabout and the introduction of new detours create increased risks for vehicles and pedestrians
27000	6/6/2025	Belize	Agriculture and Rural Development	Promoting Sustainable Growth in the Blue Economy Program	BL-L1042	Stakeholder Engagement and Information Disclosure	Assessment and Response	Inaccurate information on a disclosed consultation report
27017	6/6/2025	Brazil	Housing and Urban Development	Integrated and Sustainable Urban Development Program of The Municipality of João Pessoa	BR-L1421	Involuntary Resettlement and Land Acquisition	Assessment and Response	Allegation of an inadequate cadastral and compensation process
28316	6/22/2025	Argentina	Transport	Comprehensive Improvement of GRAL Roca Railway Project, Plaza Constitucion-La Plata Branch	AR-L1337	Resource Efficiency and Pollution Prevention	Closed	Allegations of environmental impacts from works attributed to the stockpiling of materials and the movement of heavy machinery
28679	6/27/2025	Ecuador	Water and Sanitation	Investment Program in Water and Sanitation in Ecuador	EC-L1283	Assessment and Management of Environmental and Social Risks and Impacts	Assessment and Response	Allegations of environmental and social impacts affecting residents and a dispute regarding the compensation for expropriation
28691	6/27/2025	Brazil	Water and Sanitation	Sanitation for Nova Estrada Watershed - PROMABEN II	BR-L1369	Involuntary Resettlement and Land Acquisition	Closed	Inadequate information disclosure about work schedule and timeline updates regarding resettlement process
28905	7/2/2025	Guyana	Transport	Program to Support Climate Resilient Road Infrastructure Development	GY-L1081	Labor and Working Conditions	Assessment and Response	Contract dispute regarding wrongful dismissal allegations
30192	7/7/2025	Brazil	Housing and Urban Development	Integrated and Sustainable Urban Development Program of The Municipality of João Pessoa	BR-L1421	Involuntary Resettlement and Land Acquisition	Closed	Inadequate compensation amount
32534	8/4/2025	Brazil	Housing and Urban Development	Integrated and Sustainable Urban Development Program of The Municipality of João Pessoa	BR-L1421	Assessment and Management of Environmental and Social Risks and Impacts	Assessment and Response	Inadequate quality of environmental and social management plans
32549	8/4/2025	Brazil	Water and Sanitation	Social and Environmental Program of Manaus and the Interior - PROSAMIN	BR-L1553	Community Health and Safety	Closed	Allegations of unsafe open construction sites, delays in sewage works, and severe impacts on displaced families and local communities
33579	8/15/2025	Bolivia	Housing and Urban Development	Urban Integration Program: Linear Park for La Paz and El Alto	BO-L1212	Cultural Heritage	Closed	Lack of archeological and environmental impact assessments
33880	8/19/2025	Bolivia	Health, Nutrition and Population	Support for Vulnerable Populations Affected by Coronavirus II	BO-L1219	Labor and Working Conditions	Assessment and Response	Contract dispute regarding wrongful dismissal allegations
34319	8/26/2025	Paraguay	Housing and Urban Development	Improvement of Housing and Habitat	PR-L1082	Resource Efficiency and Pollution Prevention	Assessment and Response	Discrepancies regarding solid waste management measures

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35109	9/9/2025	Brazil	Water and Sanitation	Social and Environmental Program of Manaus and the Interior - PROSAMIN	BR-L1553	Community Health and Safety	Closed	Allegations of unsafe open construction sites, delays in sewage works, and severe impacts on displaced families and local communities
35191	9/11/2025	Brazil	Housing and Urban Development	Vitória Urban Improvement and Citizen Security Program (First Stage of the Sustainable Vitória Action Plan)	BR-L1497	Involuntary Resettlement and Land Acquisition	Assessment and Response	Allegations of inadequate resettlement assessment regarding property ownership
35348	9/15/2025	Dominican Republic	Transport	Road Infrastructure Maintenance and Rehabilitation Program in the Dominican Republic	DR-L1151	Stakeholder Engagement and Information Disclosure	Assessment and Response	Lack or inadequate information disclosure regarding program's work schedule and scope
35380	9/16/2025	Regional	Health, Nutrition and Population	Reducing the Public Health Impact of Pandemics in the Caribbean through Prevention, Preparedness, and Response	RG-T4387	Labor and Working Conditions	Closed	Contract dispute regarding wrongful dismissal allegations
35640	9/22/2025	Paraguay	Transport	Program to improve and maintain PY12, from segment Cruce Nanawa to Gral. Bruguez and accesses	PR-L1174	Impact Mitigation and Access to Benefits of Indigenous Peoples	Assessment and Response	Allegations of inadequate identification in project area of influence and demands for a more participatory design of project benefits to Indigenous Peoples
35849	9/24/2025	Peru	Water and Sanitation	Comprehensive Stormwater Drainage Program in Prioritized Cities of Peru	PE-L1238	Labor and Working Conditions	Closed	Workplace harassment
36320	10/6/2025	Argentina	Transport	Project to Improve the Provincial Route 82 Corridor in the Province of Mendoza	AR-L1293	Community Health and Safety	Assessment and Response	Request to preserve the company's underground infrastructure in the areas subject to expropriation, as well as to authorize access points
36503	10/10/2025	Argentina	Transport	Project to Improve the Provincial Route 82 Corridor in the Province of Mendoza	AR-L1293	Assessment and Management of Environmental and Social Risks and Impacts	Assessment and Response	Lack of adequate environmental and social assessment and plans and consultations required by the change of location of the works
36755	10/16/2025	Argentina	Transport	Project to Improve the Provincial Route 82 Corridor in the Province of Mendoza	AR-L1293	Community Health and Safety	Assessment and Response	Disagreement regarding the process and costs of relocation of the property's perimeter fence
36835	10/17/2025	Argentina	Transport	Project to Improve the Provincial Route 82 Corridor in the Province of Mendoza	AR-L1293	Community Health and Safety	Assessment and Response	Allegations of economic impacts on businesses due to ruptures of water pipelines, and concerns related to road infrastructure and access to project information
36919	10/21/2025	Brazil	Water and Sanitation	Social and Environmental Program of Manaus and the Interior - PROSAMIN	BR-L1553	Community Health and Safety	Assessment and Response	Allegations of unsafe open construction sites, delays in sewage works, and severe impacts on displaced families and local communities
36995	10/22/2025	Argentina	Water and Sanitation	Water and Sanitation for Small Communities Program - Tranche II (PROAS II)	AR-L1289	Community Health and Safety	Assessment and Response	Allegation that the suspension of a project led to the discharge of untreated effluents, creating health risks and failing to comply with the project's environmental measures
37189	10/27/2025	Paraguay	Housing and Urban Development	Improvement of Housing and Habitat	PR-L1082	Involuntary Resettlement and Land Acquisition	Assessment and Response	Discrepancies with approved housing plans and allegations about housing infrastructure issues and delays in delivery date



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37283	10/29/2025	Colombia	Agriculture and Rural Development	Capacity-Building for Ethnic Groups to Reduce Deforestation and Improve Forest Management	CO-T1570	Labor and Working Conditions	Assessment and Response	Workplace harassment
37445	11/3/2025	Peru	Education	Program for the Improvement of the Quality and Relevance of University and Technical Higher Education Services at the National Level	PE-L1227	Labor and Working Conditions	Assessment and Response	Workplace harassment
37583	11/6/2025	Costa Rica	Transport	Cantonal Road Network II Program	CR-L1065	Community Health and Safety	Assessment and Response	Properties damaged as a result of a weather event and potential project impacts
37760	11/10/2025	Dominican Republic	Transport	Road Infrastructure Maintenance and Rehabilitation Program in the Dominican Republic	DR-L1151	Stakeholder Engagement and Information Disclosure	Assessment and Response	Lack or inadequate information disclosure regarding program's work schedule and scope
38189	11/18/2025	Brazil	Transport	Logistics Efficiency Program of Espirito Santo	BR-L1524	Community Health and Safety	Applicability	Environmental impacts related to waste management and heavy traffic
38344	11/21/2025	Costa Rica	Transport	Road Infrastructure Program and promotion of Public-Private Partnerships (PPP)	CR-L1139	Involuntary Resettlement and Land Acquisition	Assessment and Response	Delays and uncertainty regarding the resettlement process and its timeline, and an inadequate consultation process
38317	11/24/2025	Bolivia	Health, Nutrition and Population	Support for Vulnerable Populations Affected by Coronavirus II	BO-L1219	Labor and Working Conditions	Assessment and Response	Workplace harassment and non-payment
38723	12/2/2025	Brazil	Water and Sanitation	Sanitation for Nova Estrada Watershed - PROMABEN II	BR-L1369	Involuntary Resettlement and Land Acquisition	Assessment and Response	Lack of consideration of the alleged economic activity within the framework of the resettlement process
39558	12/22/2025	Bolivia	Trade and Investment	Cultural Heritage Tourism Management Program	BO-L1182	Labor and Working Conditions	Applicability	Workplace harassment

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