



Annual Report **2024**

Independent
Consultation and
Investigation
Mechanism



Building a shared vision

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Photography: MICI team.

Cataloging-in-Publication data provided by the Inter-American Development Bank Felipe Herrera Library

Independent Consultation and Investigation Mechanism: 2024 Annual Report / Inter-American Development Bank.

p. cm.

1. Development banks-Latin America-Yearbooks. 2. Social responsibility in banking-Latin America. 3. Economic development projects-Social aspects-Latin America. 4. Economic development projects-Environmental aspects-Latin America. I. Inter-American Development Bank. Independent Consultation and Investigation Mechanism.

IDB-AN-00386

JEL: O1, O10, O19, Q01

Keywords: Accountability, Complaints management, Consultation Phase, Compliance Review Phase, Access to information

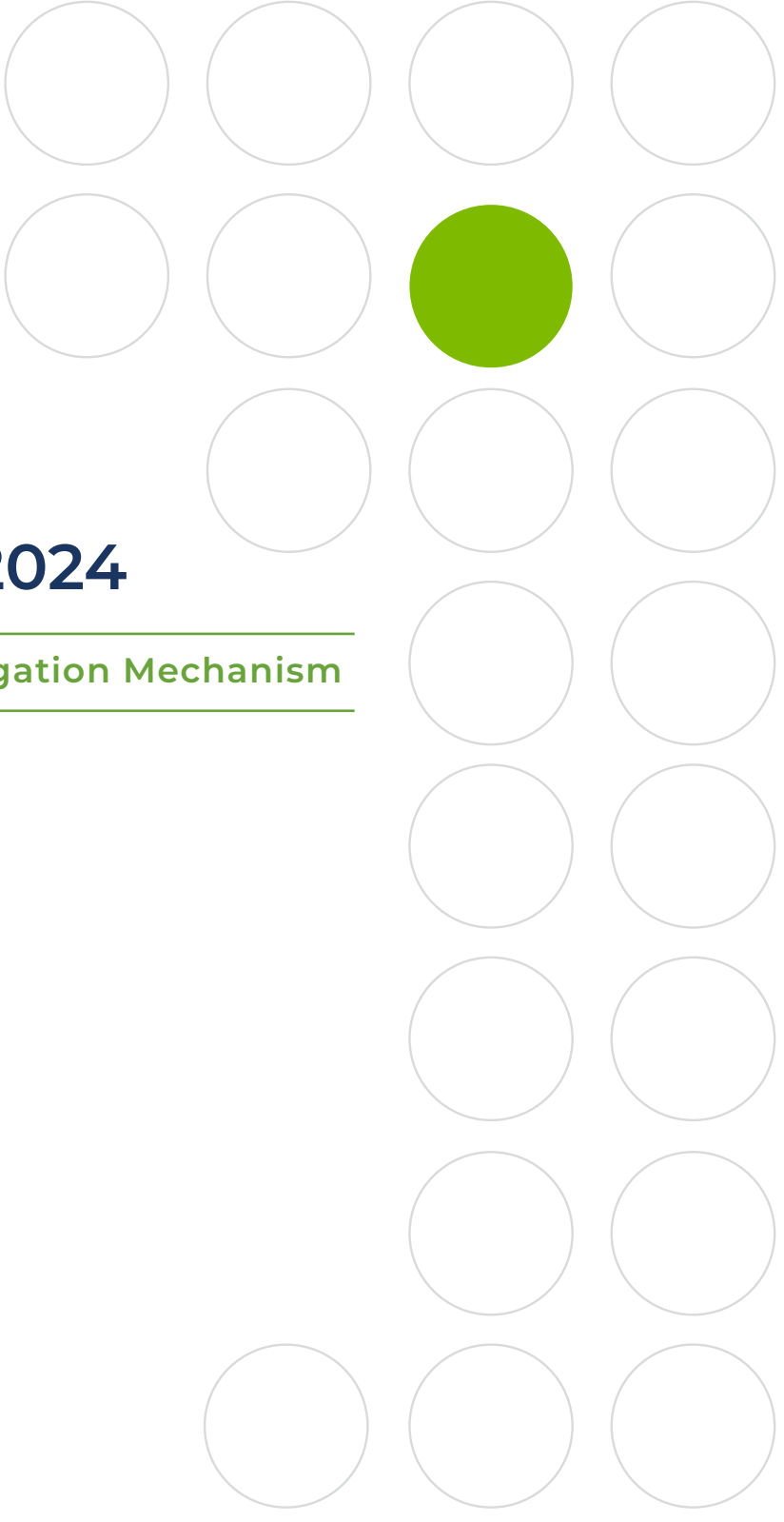
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A decorative graphic in the top right corner consisting of a grid of circles. The grid is 4 columns wide and 10 rows high. The circles are arranged in a staggered pattern. The circle in the second row, third column is filled with a solid green color, while all other circles are empty with a light gray outline.

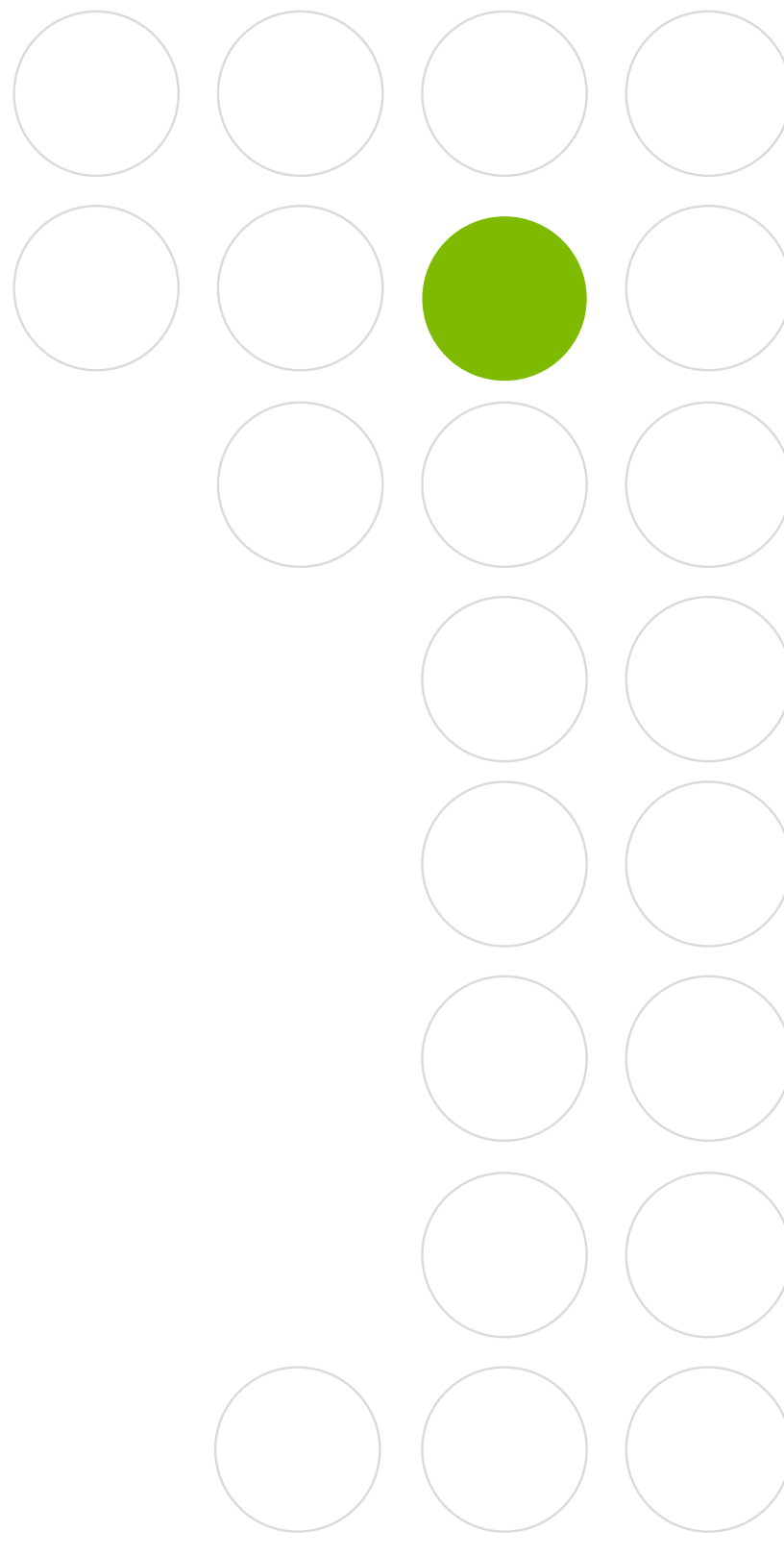
Annual Report 2024

Independent Consultation and Investigation Mechanism

IDB Group

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From the Board of Executive Directors

2024 was an important year for the IDB Group. During its Annual Meetings in Punta Cana, the Boards of Governors approved a new institutional strategy that will shape the organization's course for the coming years, aiming for greater impact and better results. This new strategy will be a key tool in advancing our mission of improving lives in Latin America and the Caribbean.

Within this mission, the Independent Consultation and Investigation Mechanism plays a key role: MICI serves as an accountability instrument, ensuring that the IDB Group listens to the perspectives of the communities we serve—particularly when those communities express concerns about the projects the Bank finances or fear that those initiatives may negatively impact their living conditions or the environment. MICI also contributes to the environmental and social sustainability of the projects, working to find solutions that create lasting and positive impacts. In doing so, the Mechanism strengthens the connections between our work, local realities, and the people of the region. MICI's role is essential both within the Bank—from the Board to senior management and project teams—and among external stakeholders, including civil society and community organizations.

For the Mechanism, 2024 was also a year of consolidating its team and strengthening its work across both Phases. Recognizing the importance of its role, the Board of Executive Directors has worked closely to ensure that MICI has the necessary resources and support to further enhance the sustainability of the IDB Group's operations.

Despite the progress made in recent years, we must always strive to do better, acknowledging that the region's challenges require continuous effort of the entire Group. That is why the Board of Executive Directors remains committed to supporting the Mechanism, reinforcing our mission, and ensuring that our operations continue to improve lives throughout Latin America and the Caribbean.

Alberto Nadal

IDB Executive Director for Austria, Denmark, Finland, France, Norway, Spain and Sweden.

Chairperson of the Policy and Evaluation Committee of the IDB

Message from the Director

Building a shared vision



I am pleased to present the 2024 Annual Report of the Independent Consultation and Investigation Mechanism. This report reflects our ongoing commitment to transparency, accountability, and continuous process improvement.

In 2024, we once again managed a record number of 21 cases through dispute resolution or investigations. However, an interesting development was the decline in new complaints, breaking the upward trend of recent years. This decrease is primarily due to the fact that, for the first time, no complaints outside our mandate –such as those related to ethics or corruption– were submitted to the Mechanism. This improvement is the result of years of effort to provide clearer and more accessible information about the various instances within the IDB Group for addressing different types of complaints. Enhanced institutional cooperation has helped ensure that requests are directed more efficiently to the appropriate channel.

The work of both Phases continued to strengthen. The Consultation Phase managed 12 cases, reaching agreements in three out of five cases in a dialogue process, and monitoring the implementation of agreements in seven more cases. For its part, the Compliance Review Phase managed nine cases, marking an all-time high. We currently have more action plans in the monitoring stage than in previous years, and we are adjusting our processes to improve outcomes. A very noteworthy aspect in this regard is the creation of dedicated spaces within the Phase process to foster dialogue and ensure all parties feel heard. These improvements have strengthened our investigations, as well as the design and monitoring of action plans, helping to better align them with the realities of the communities we serve and ultimately achieve better results.

In terms of access promotion, we have once again worked closely with civil society organizations and other key stakeholders across the region, while preserving spaces for dialogue with academia, executing agencies, and project teams from both IDB and IDB Invest. It is also worth noting that more than 10,000 people participated in an online event to present to communities how they can make their voices heard when a development project may negatively impact them. MICI led this event in which the independent mechanisms of seven international institutions presented their work.

Many of our achievements in 2024 and prior years stem from the commitments MICI made in 2021 through the action plan to implement recommendations from the Office of Evaluation and Oversight (OVE). While some tasks remain ongoing, this plan has provided a clear roadmap, allowing us to advance in the right direction and already yield visible results. I believe these collective efforts are shaping a sharper, more holistic vision of what accountability means within the IDB Group. More importantly, I believe that this vision is increasingly shared across the institution, which is essential to strengthening our commitment to sustainability and social inclusion across the region.

I extend my gratitude to all who have contributed to this progress and invite you to continue working together to enhance transparency and accountability within the IDB Group, so that we can continue collectively advance the sustainable development goals of Latin America and the Caribbean.

Andrea Repetto
MICI Director

Highlights of 2024

31
complaints

23 IDB **7** IDB Invest **1** IDB Lab

In 2024, MICI processed 31 complaints: 23 related to IDB projects, seven to projects financed by IDB Invest, and one to IDB Lab.

12

New complaints

Over the year, the Mechanism received 12 new complaints, a 30% decrease compared to the average of the past five years.

Of these new complaints, nine (75%) were closed at the registration stage, mainly because they did not meet the requirement of prior contact with the project team.

12

The Consultation Phase

managed 12 cases. Agreements were reached in three of five cases engaged in a dialogue process. In addition, the implementation of agreements was monitored for seven additional cases, with one achieving full compliance with the agreed measures.

9

The Compliance Review Phase

processed nine cases, setting an all-time record.

The team prepared recommendations for two investigations and managed six investigations simultaneously. One investigation was finalized, along with the monitoring plan for an IDB Invest action plan.



29 Events → 2,000+ people

Over 2,000 people participated in the 29 events featuring the Mechanism.



1st. live → 10,000+ people

More than 10,000 people attended MICI's first-ever live event on social media.

Fewer complaints received

Since 2018, MICI had been receiving an increasing number of complaints each year. However, in 2024 this upward trend was reversed, mainly due to a decline in complaints related to corruption and procurement, which are issues outside our mandate, and which had previously been the leading cause of nonregistration. Despite this decline, the total number of cases managed across both phases remained at a record 21.

More cases under investigation

The Compliance Review Phase managed nine cases—two more than the previous year—setting an all-time record for the team. The number of investigations running in parallel also reached a new high, increasing from six in 2023 to seven in 2024.

Three new agreements

The dispute resolution facilitated by MICI led to agreements between the parties in three complaints after successfully concluding the dialogue process. For two of these complaints, the negotiations were completed in less than three months.

Breaking down barriers

In 2024, MICI introduced WhatsApp as a new communication channel and launched an online form to file complaints—two small yet significant steps toward improving accessibility for communities in need.

Event with over 10,000 attendees

MICI led a large-scale event broadcast on YouTube, Facebook, and LinkedIn to showcase eight accountability mechanisms operating in the region. To reach a broader audience with clear, engaging, and accessible messages, the format of traditional online seminars was reinvented, adopting an innovative TV-news-style presentation.

Explaining case outcomes

As part of the MICI Reflections knowledge program, the Consultation Phase published two summaries of successfully closed complaints that had undergone dispute resolution processes. These cases involved projects in Colombia and Costa Rica.

12

cases

Consultation Phase

The Consultation Phase received three new cases and managed a total of 12.

During the year:

Agreements were reached for three complaints, which then advanced to the monitoring stage.

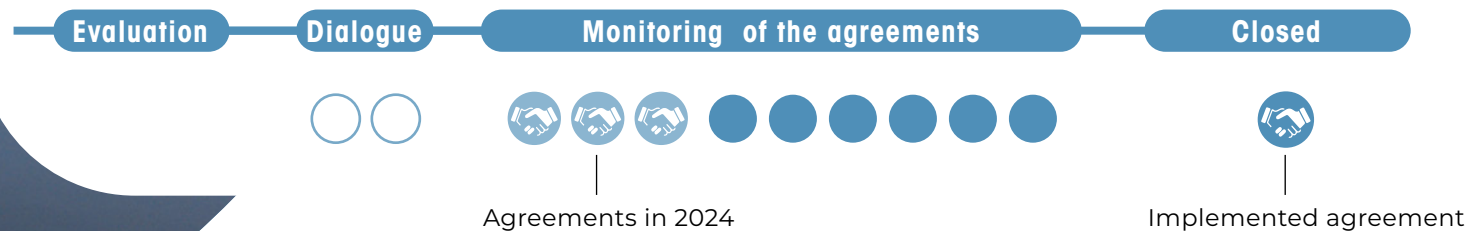
The Phase monitored the implementation of agreements in 10 cases.

One case under monitoring was closed after verifying full implementation of the agreements.

Two other cases remain in the dialogue process.

2024

Cases status as of December 31, 2024



Adapting timelines to reality

Of the three agreements reached this year, two were finalized in less than two months. These were facilitated directly by the Phase team and integrated the assessment and dialogue stages into a single process. The third agreement, by contrast, resulted from an extended negotiation process that lasted almost two years. These cases demonstrate, once again, that flexibility in adapting processes and timelines to the specific needs of each case is a key factor in achieving successful outcomes.

Extending monitoring periods

Two cases required extending the monitoring period beyond the five-year limit established under the MICI Policy. In Haiti, the country's delicate situation has made it necessary to extend the deadlines to continue implementing the agreements related to the Caracol Industrial Park, where progress continues to be made despite the instability of recent years. In Argentina, it was also necessary to extend for a year and a half the implementation period of one of the cases related to the Reconquista River because the parties, given the impossibility of complying with the central point of the agreement, agreed on a series of substitute measures to that point.

Both cases highlight the importance of adapting solutions with flexibility when the reality of communities and projects changes, to ensure that agreements can be implemented.

Signing of the agreement on a project related to Galapagos, in Ecuador.



Meeting during the closing mission of the Cantonal Road Network Program in Costa Rica.

9
cases

Compliance Review Phase

The Compliance Review Phase processed nine cases.



Cases status as of December 31, 2024

Recommendation — Investigation — Monitoring of the action plan — Closed



Awaiting for the action plan
(The preparation of the action plan is the responsibility of the IDB.)

MICI recommended not to investigate

Beyond investigations

Accountability mechanism investigations cannot merely be reports that do not result in changes and solutions for the communities that filed the complaint or the institutions responsible for a project. Recognizing this need, the Board has requested, on an increasingly consistent basis, specific plans from IDB and IDB Invest Management to address the findings and recommendations of the compliance verification processes. In this regard, in 2024, the Phase began monitoring a second action plan, in Colombia, in addition to the one already being monitored in Guatemala. Furthermore, the IDB finalized another action plan in 2024, which the Phase will begin monitoring in 2025.

Joint dialogue for better outcomes

As the Phase takes on more cases in the monitoring stage of an action plan, new learnings and dynamics will emerge, strengthening internal processes and improving results. In the two cases currently being monitored, the Phase has fostered constructive collaborative spaces between the requesters and IDB Invest, aiming to maximize mutual understanding and facilitate the implementation of the action plan's measures. These exchanges adopted different forms and, in most cases, MICI hired external facilitators to moderate conversations and seek points of understanding. For example, in Colombia, the parts jointly discussed the measures of one of the recommendations on the Ituango hydroelectric project. In Guatemala, the Phase accompanied Indigenous communities and IDB Invest to a meeting with experts to explore alternatives to remove abandoned infrastructure in the area where two run-of-the-river hydroelectric plants had been planned.

Investigation mission in Uruguay.



Investigation mission for the Ituango hydroelectric project in Colombia.

In access promotion

+ 10,000

Over 10,000 people attended MICI's first-ever live event on social media.



+ 2,000

More than 2,000 participants took part in 21 external events.



+ 280

Over 280 IDB Group employees attended 8 MICI activities.



A MICI within everyone's reach

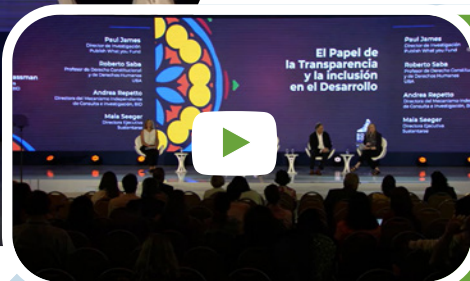
Once again, MICI worked to make its mechanism more widely known and accessible to those who need it. It engaged universities, civil organizations, executing agencies, and companies to build a network of allies who understand MICI's work in the region and can help disseminate it. Additionally, it strengthened internal outreach within the Bank, reinforcing the IDB Group-wide commitment to transparency and accountability. Here are the highlights of some of these activities.

MICI takes the floor at the IDB Group's Annual Meeting



MICI director places transparency and accountability at the core of the IDB Group's new strategy

For the first time ever, a MICI director participated in a panel discussion during the Annual Meeting of the IDB Group, which was held in Punta Cana, Dominican Republic. *"Without transparency, without inclusion, without accountability, we're hardly going to see development."* During the 64th Board of Governors meeting, Andrea Repetto highlighted these principles as key pillars that must be integrated into the IDB Group's new strategy for 2030. The MICI director underscored that *"it is essential to listen to the communities and give clear and timely information about the projects: that is transparency. And it is imperative to address their complaints and resolve their concerns when they believe that a project will negatively impact them: that is inclusion and accountability."*



← [Watch her full speech here.](#)



First live event on social media

«Right to Complain» shows communities how to make their voices heard in international development projects

In December, coinciding with World Human Rights Day, MICI hosted a virtual event with an innovative format to showcase the grievance mechanisms of eight international financial and development organizations among communities in the region. The event adopted a dynamic, TV-style format designed to be highly engaging and educational. Representatives from the eight participating institutions explained how communities affected by development projects can file complaints and press for compliance with the environmental and social standards by which these organizations are governed.

Thousands of people tuned in to the live event, which has already surpassed 100,000 views across YouTube, Facebook, and LinkedIn within the first month of its broadcast. In addition to experts from each mechanism, representatives from academia and civil society organizations also participated. This social media live event was supported by the IDB, which provided its digital platforms and technological infrastructure to amplify the reach of the independent mechanisms.

Looking ahead, MICI is preparing a 2025 edition of the event, this time in Portuguese, specifically for communities in Brazil.



Watch the live event



Civil society and other stakeholders

MICI works closely with civil society organizations and other key stakeholders to promote dialogue and ensure that communities understand their rights and the pathways available to access the mechanism.

Training civil society organizations in socioenvironmental conflict resolution

In May, the Consultation Phase, in collaboration with its counterpart team at the World Bank (Dispute Resolution Service, AM/DRS), organized a pair of two-day workshops in São Paulo and Montevideo. These sessions trained civil society organizations from across the region in managing conflicts related to development projects.



Strengthening the IDB's work

In 2024, MICI expanded its collaboration with the Bank by participating in workshops for executing agencies from various countries.

Its presence in these trainings, led by the Environmental and Social Solutions Division (ESG), represents another step toward ensuring that project managers across the region fully understand the role of MICI, gain deeper insight into the IDB Group's accountability system, and explore ways to improve their own tools and practices.



MICI shares its conflict management tools with over 100 executing agencies in Bolivia and Ecuador

As part of a workshop organized by ESG, MICI led a session on conflict resolution to help public entities better understand and manage social challenges in stakeholder engagement.

Within the IDB Group

MICI conducts outreach activities within the IDB Group on an ongoing basis, driving internal reflection and continuous improvement in project management. These initiatives are essential for IDB Group staff to gain a deeper understanding of how MICI, in its independent role, strategically contributes to the Bank's mission.

Meetings with IDB teams

MICI presented its dispute resolution and investigation processes to the IDB's Climate Change and Sustainable Development Sector and highlighted how community complaints can be used to improve the sustainability of projects.

The Mechanism also met with IDB representatives in Caribbean countries to discuss specific situations in those countries and strengthen understanding of the role of MICI among their teams.

As part of the knowledge exchange series with IDB and IDB Invest, a session was organized this year to explore the implications of involuntary resettlement in development projects.

Presentation of MICI to the climate change sector.



MICI meeting with IDB officials in the Caribbean.

Collaboration with other complaint mechanisms

Through its participation in networks and meetings with other independent mechanisms, MICI seeks to foster shared learning, enhance its processes, and contribute to strengthening global standards of accountability and transparency.

Twenty-first Annual Meeting of the Independent Accountability Mechanisms Network (IAMnet), in Manila

MICI exchanged experiences with other independent mechanisms within the IAMnet network and engaged with civil society organizations in discussions on key issues such as collaboration in the management of complaints and the participation of Indigenous peoples. Following this, the Mechanism hosted a meeting in Washington, D.C., to address shared challenges and explore opportunities to enhance the effectiveness of grievance management in projects funded by multiple institutions.

Collaborating with emerging grievance mechanisms

The Ministry of the Environment, Water, and Ecological Transition of Ecuador invited MICI to share its expertise, lessons learned, and best practices in complaint management. The session also featured participation from UNDP Ecuador, PROAmazonía, WWF-Ecuador, and Conservation International Ecuador.

IAMnet meeting in Manila.



Meeting with other grievance mechanisms in Washington.



Knowledge session with Ecuadorian organizations.



Academia

In 2024, MICI continued to strengthen its ties with academia, collaborating on courses and diploma programs to share knowledge on accountability, sustainability, and access to redress mechanisms with students and future professionals.

Training leaders in conflict resolution

During her participation in the Diploma in Negotiation, Mediation, and Prevention of Conflicts Business-State-Communities, MICI's director highlighted the importance of integrating development, social justice, and sustainability.

MICI at the First International Symposium on Business and Human Rights in Costa Rica

Maria Camila Barriga, specialist with the Consultation Phase, presented the processes of MICI to facilitate access to remedy for communities affected by business activities.

Promoting corporate responsibility

At the launch of the second Business and Human Rights Diagnosis at the Pontifical University of Chile, Andrea Repetto highlighted the importance of integrating environmental and social safeguards into decision-making in business.

I International Symposium on
Business and Human Rights in Costa Rica.



Second Corporate Sustainability Meeting 2024.

In communication

A more accessible and clear public registry

In 2024, MICI launched a new version of its public registry, providing access to information on all complaints received since the Mechanism's creation. The updated registry offers enhanced search and filtering capabilities, making it easier to navigate. Additionally, each case file now includes more detailed and clearly presented information.

Improving the accessibility of the Mechanism

This year, MICI introduced a new [online complaint form](#), simplifying the process for individuals and communities to submit complaints. This form helps potential complainants gather and provide all the necessary information before filing a complaint.

Furthermore, communities can now contact MICI via [WhatsApp](#)—one of the most widely used communication channels across Latin American and the Caribbean. This new channel reduces barriers to contact MICI and facilitates more efficient interactions between MICI and the communities it serves.



Presentar un reclamo

Si no lo ha hecho aún, por favor revise la [guía para presentar un reclamo](#) para comprender mejor los reguladores necesarios de las quejas ante el MICI y qué otros recursos tiene a su disposición si se siente potencialmente afectado por algún proyecto financiado por el Grupo BID (Banco Interamericano de Desarrollo, BID Inverti y BID Lab). En caso de duda, puede contactarnos por correo electrónico o por teléfono.

Sólo las personas del MICI encargadas del registro de reclamos tendrán acceso a la información que nos envíe mediante este formulario, que se tratará conforme a las políticas del Grupo BID sobre información de carácter personal.

¿Quién presenta esta queja?

Describe quién presenta esta reclamación

Digamos cuántas personas son y informen algo tipo de grupo, asociación, comunidad, etc.

Información de contacto de, al menos, una persona.

***Nombre y apellidos:**
 Describe su nombre completo

***Correo electrónico:**
 Describe su correo electrónico

Confidencialidad:
☐ Marque esta casilla si quiere que el MICI promueva la confidencialidad de su identidad en el proceso MICI.

***Regla su correo electrónico:**
 Regla su correo electrónico

Número de teléfono:
 Describe su número de teléfono

Proporcione un tipo o celular whatsapp
 *Municipio, provincia y país desde residen

Describe la ciudad, provincia y país en el que se encuentra

Datos de contacto adicionales (nombre, apellidos y correo o teléfono)
 Si lo desea, puede añadir los datos de contacto de otras personas reclamantes que deseen recibir nuestras comunicaciones.

El motivo de su queja

Nombre o Número del proyecto financiado por BID, BID Inverti o BID Lab
 Si lo desea, introduzca el nombre del proyecto o el número de la operación

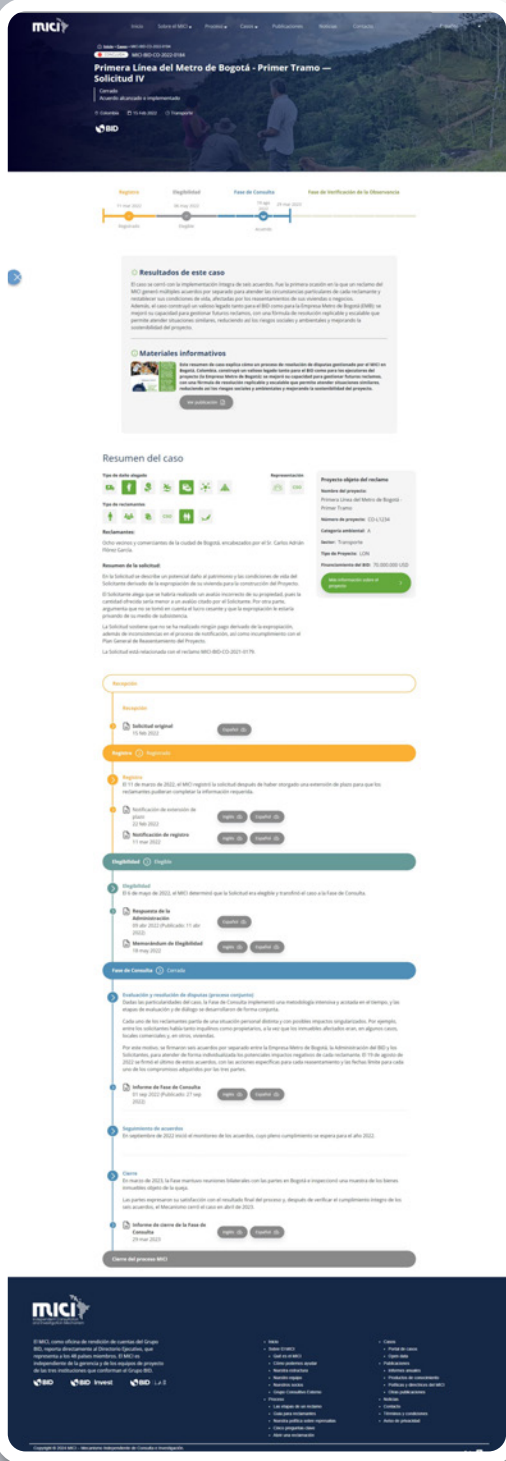
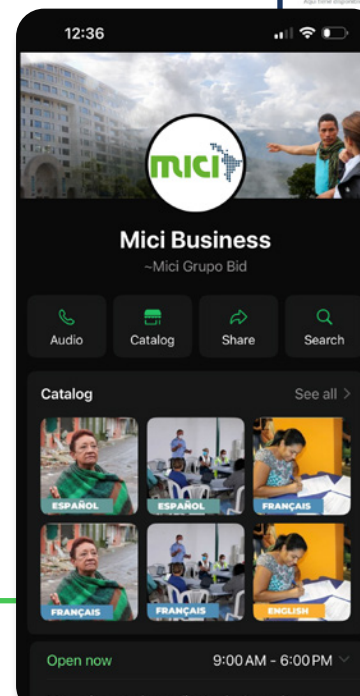
Aquí tiene disponible la información sobre los proyectos de BID y BID Lab, y está para los [BID Invest](#)

¿Qué tipo de datos le está accionando o le puede ocasionar el proyecto?

¿Qué datos o acciones ambientales o sociales, como: gestión, afectaciones al medio ambiente o medios de vida de los reclamantes, a impactos culturales, al tejido social, a los derechos humanos una explicación de cómo, cómo entender qué afectaciones en su caso general?

¿Qué acciones o medidas de mitigación o compensación, con el [equipo de trabajo de BID](#), de gestión de riesgos de BID Invest, por favor, explique brevemente cómo fue la medida.

¿Qué acciones o medidas de mitigación o compensación, con el [equipo de trabajo de BID](#), de gestión de riesgos de BID Invest, por favor, explique brevemente cómo fue la medida.

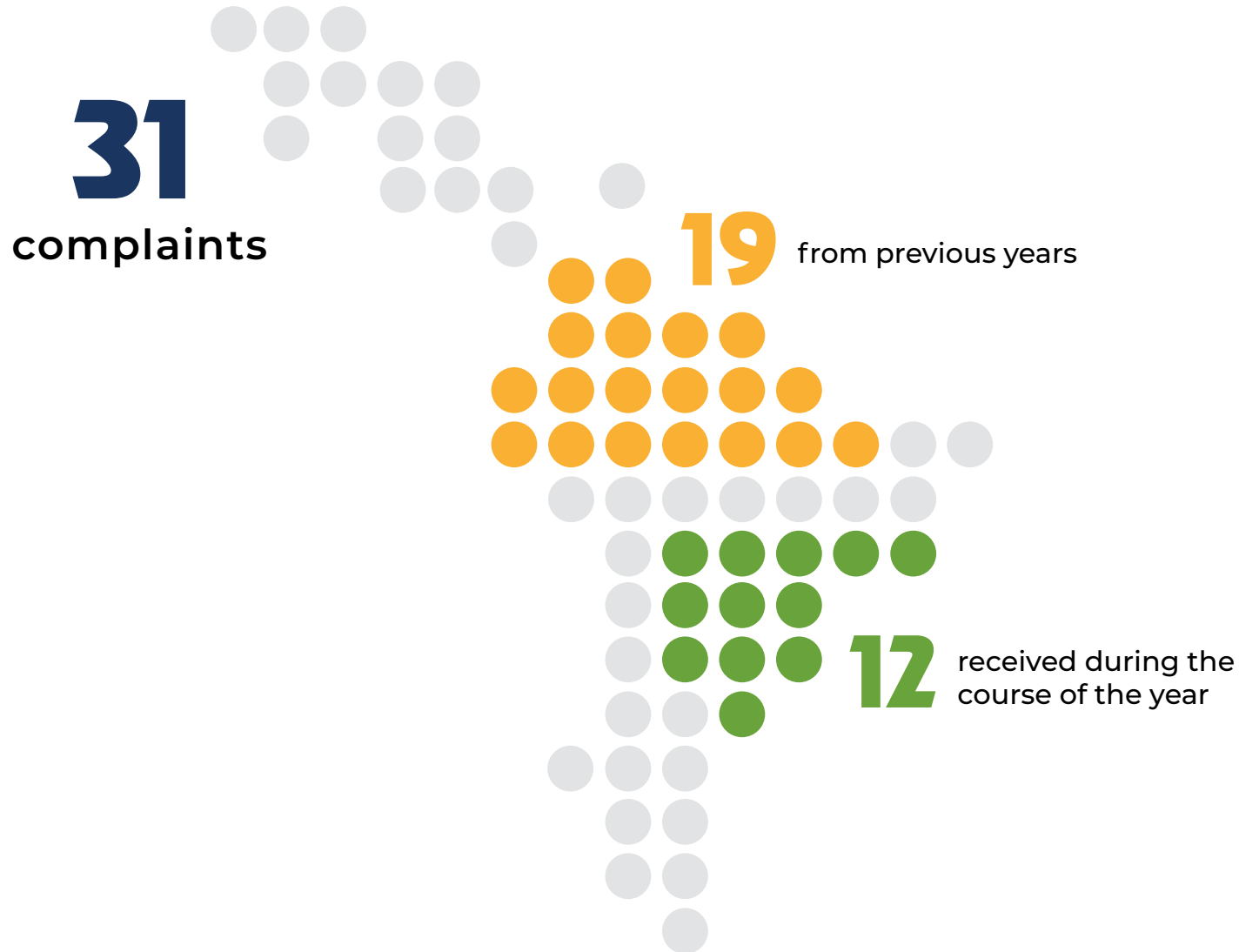


Meeting of the External Consultative Group with the MICI team.



2024 Portfolio of Complaints

In 2024, MICI managed 31 complaints: 19 from previous years and 12 received during the course of the year. The number of new complaints is among the lowest in the past five years, breaking a sustained upward trend that was only interrupted in 2020 due to the pandemic. Despite this decline, both Phases continue to manage a record number of cases.



Five highlights

Complaints received in 2024

The number of complaints received in 2024 (12) is 30% lower than the annual average recorded between 2019 and 2023 (17.2).

Reasons for non registration

A significant part of this decline is due to fewer complaints related to corruption and procurement issues, which fall outside MICI's mandate.

By sectors

Transport continues to be the sector with the highest number of complaints, accounting for half of all new complaints in 2024.

By countries

Brazil remains one of the countries with the highest number of complaints. Meanwhile, Uruguay saw a slight increase in its proportion of complaints, while Argentina experienced a decline.

Civil society

The number of complaints filed with support from civil society organizations (CSOs) has increased among new cases, rising from 9.5% in 2022 and 13% in 2023 to 16% in 2024.

Portfolio of MICI complaints in 2024, in order received

Complaints related to projects funded by:

● IDB | ● IDB Invest | ● IDB Lab

Stages



Case	Country	Complaint name and project number	Status as of December 31, 2024	Pag.
● MICI-PE-2015-0094	Peru	Rural Land Titling & Registration Project in Peru – Third Phase (PTRT-3) (PE-L1026)	Compliance Review Phase — Awaiting for Management's action plan	56
● MICI-BID-HA-2017-0114	Haiti	Productive Infrastructure Program — Request II (HA-L1055)	Consultation Phase — Monitoring of agreements	36
● MICI-CII-CO-2018-0133	Colombia	Ituango Hydropower Plant (11794-04)	Compliance Review Phase — Monitoring of Management's action plan	58
● MICI-CII-GU-2018-0136	Guatemala	Generadora San Mateo S.A. and Generadora San Andrés S.A. (GU3794A-01, GU3798A-01)	Compliance Review Phase — Monitoring of Management's action plan	60
● MICI-BID-AR-2019-0148	Argentina	Reconquista River Basin Environmental Sanitation Program — Request III (AR-L1121)	Consultation Phase — Monitoring of agreements	38
● MICI-CII-CO-2019-0152	Colombia	Ruta del Cacao 4G Toll Road (12252-01)	Compliance Review Phase — Under investigation	62
● MICI-BID-AR-2021-0164	Argentina	Development Program For Metropolitan Areas Outside the Capital II (AR-L1243)	Consultation Phase — Monitoring of agreements	40
● MICI-BID-AR-2021-0170	Argentina	Integrated Urban Solid Waste Management Program — Request II (AR-L1151)	Consultation Phase — Monitoring of agreements	42
● MICI-BID-CR-2021-0171	Costa Rica	Cantonal Road Network II Program (CR-L1065)	Consultation Phase — Closed after the implementation of the agreements	44
● MICI-BID-AR-2022-0182	Argentina	Integrated Urban Solid Waste Management Program — Request IV (AR-L1151)	Compliance Review Phase — Under investigation	63
● MICI-BID-AR-2022-0188	Argentina	Reconquista River Basin Environmental Sanitation Program — Request V (AR-L1121)	Consultation Phase — Monitoring of agreements	45
● MICI-BID-BR-2022-0189	Brazil	National Tourism Development Program - PRODETUR Nacional-Rio de Janeiro (BR-L1210)	Compliance Review Phase — Under investigation	64
● MICI-BID-CO-2022-0192	Colombia	Metro of Bogota First Line - First Tranch — Request V (CO-L1234)	Consultation Phase — In dialogue process	46
● MICI-CII-UR-2022-0199	Uruguay	Tacuarembó-Salto Green Transmission Line — Request II (12220-01)	Compliance Review Phase — Under investigation	65
● MICI-CII-CO-2023-0210	Colombia	Pamplona-Cúcuta Toll-road - Social Bond (14094-01)	Compliance Review Phase — Closed: MICI recommended not no investigate	66
● MICI-BID-BO-2023-0214	Bolivia	Enhancing the Ecosystem for Entrepreneurship and Innovation in Bolivia — Request II (BO-T1346)	Consultation Phase — Monitoring of agreements	47

Portfolio of MICI complaints in 2024, in order received

Complaints related to projects funded by:

● IDB | ● IDB Invest | ● IDB Lab

Stages



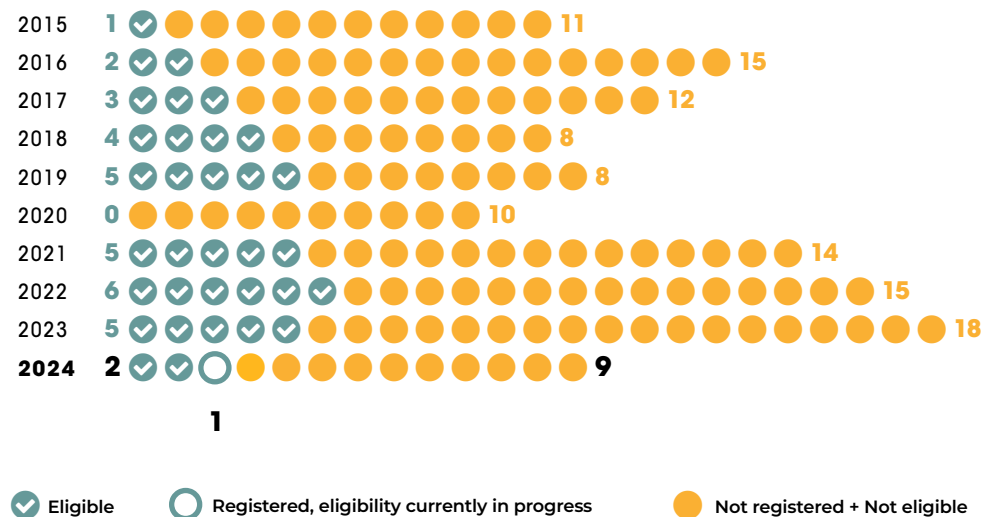
Case	Country	Complaint name and project number	Status as of December 31, 2024		Pag.
● MICI-BID-BR-2023-0216	Brazil	Curitiba's Sustainable Urban Mobility Program — Request II (BR-L1532)		Consultation Phase — Monitoring of agreements	48
● MICI-CII-EC-2023-0218	Ecuador	Procesadora Nacional de Alimentos, C.A. ("PRONACA") and La Estancia Investment Holding, S.L. ("La Estancia") (I1598-04)		Compliance Review Phase — Under investigation	67
● MICI-BID-BO-2023-0225	Bolivia	Rural Land Regularization and Titling Program (BO-L1113)		Consultation Phase — In dialogue process	50
▼ COMPLAINTS RECEIVED IN 2024					
● MICI-BID-CO-2024-0226	Colombia	Metro of Bogota First Line - First Tranch — Request XII (CO-L1234)		Closed — Not registered	72
● MICI-BID-HO-2024-0227	Honduras	Civic Coexistence and Neighborhood Improvement Program (HO-L1187)		Closed — Not registered	72
● MICI-BID-AR-2024-0228	Argentina	Water and Sanitation Program for Metropolitan Areas — Request IV (AR-L1162)		Closed — Not registered	73
● MICI-BID-EC-2024-0229	Ecuador	Sustainable Development and Biodiversity Program in Ecuador (EC-U0005)		Consultation Phase — Monitoring of agreements	52
● MICI-BID-BR-2024-0230	Brazil	Social and Environmental Program of Manaus and the Interior - PROSAMIN (BR-L1553)		Consultation Phase — Monitoring of agreements	53
● MICI-BID-BR-2024-0231	Brazil	Curitiba's Sustainable Urban Mobility Program — Request III (BR-L1532)		Closed — Not registered	72
● MICI-BID-BR-2024-0232	Brazil	Curitiba's Sustainable Urban Mobility Program — Request IV (BR-L1532)		Closed — Not registered	72
● MICI-BID-PE-2024-0233	Peru	Improvement Huanuco Road, Conococha Huanuco Sector - Huallanca PE - 3N Route Project — Request II (PE-L1151)		Closed — Not registered	72
● MICI-BID-BR-2024-0234	Brazil	Curitiba's Sustainable Urban Mobility Program — V (BR-L1532)		Closed — Not registered	72
● MICI-BID-BR-2024-0235	Brazil	Vitória Urban Improvement and Citizen Security Program (BR-L1497)		Registration — In progress	73
● MICI-CII-UR-2024-0236	Uruguay	TCP Port Expansion Program (I3502-01)		Registration — In progress	70
● MICI-BID-UR-2024-0237	Uruguay	Neighborhood Improvement Program III (UR-L1146)		Closed — Not registered	72

Complaints by the numbers

Evolution in complaints received

In 2024, the upward trend in the number of complaints received each year since 2018 (except for 2020, when the decline was likely due to the impact of the pandemic) was reversed.

Trends in complaints received

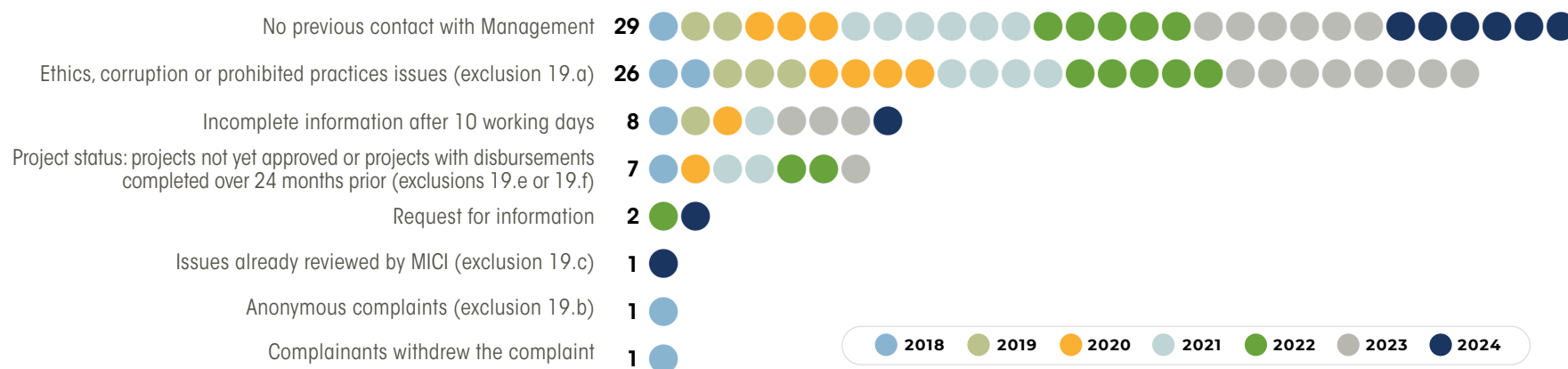


Methodological note: The registration process for two complaints received at the end of the year was completed in January 2025. One was not registered, while the other was registered and entered the eligibility review stage. For clarity, the graph shows the first complaint as “not registered” and indicates that the eligibility review of the second complaint is still in process.

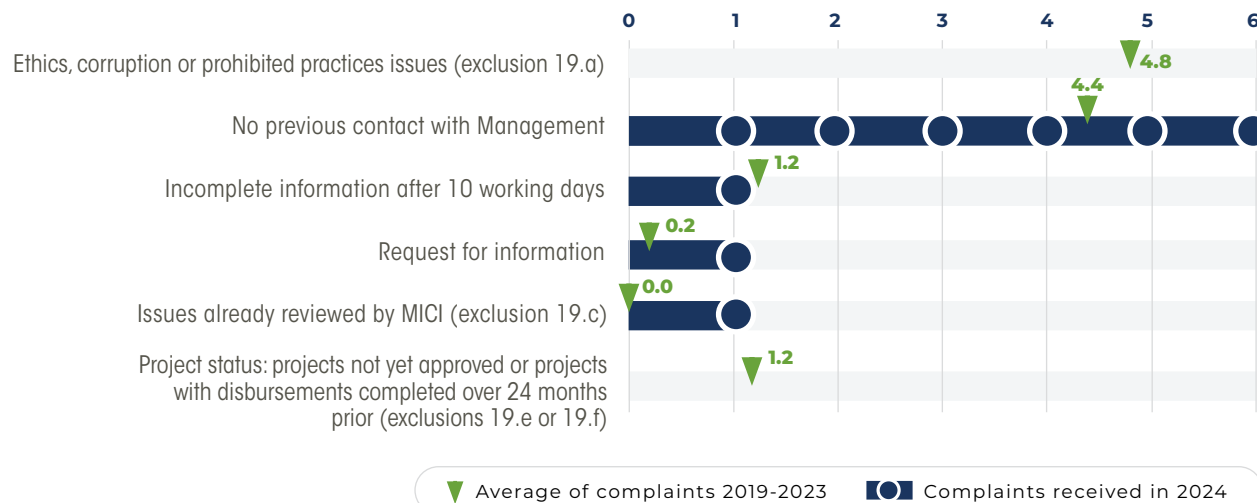
Source for all charts: MICI's Complaints Management System

While it is still too early to draw definitive conclusions about the decrease in the number of complaints received, a preliminary analysis shows a notable drop in complaints related to ethics, corruption, and procurement—issues that fall outside MICI's mandate (exclusion 19.a of the s Policy). These complaints are forwarded to the relevant IDB Group office. Between 2018 and 2023, these issues were the leading cause of nonregistration, while in 2024 these situations dropped to zero. However, since October 2023, the IDB launched a [new website](#) that centralizes all available complaint channels in a clear, more comprehensive manner. This improvement may have contributed to the fact that such complaints have been submitted directly to the offices responsible for handling them, bypassing MICI altogether.

Reasons for non-registration (complaints received between 2018 and 2024)



Reasons for non-registration: comparison between 2024 and five-year average



Complaints received in 2024

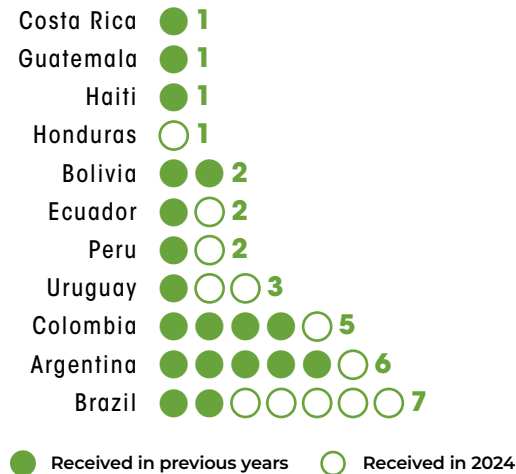
In 2024, no complaints were received referring exclusively to issues outside MICI's mandate (exclusion 19.a), which was, on average, the leading cause of non-registration over the past five years.

Complaints by the numbers

Where do the complaints come from?

In 2024, MICI managed 31 complaints from 11 countries across Latin America and the Caribbean. Brazil (7), Argentina (6), and Colombia (5) lead the list of countries with the most complaints.

Cases managed by country



Complaints received in 2024

The 12 complaints received in 2024 came from 7 countries. Brazil led the list with 5 complaints, 3 of which were related to the same project. Uruguay ranked second with 2 complaints.

Who is filing the complaints?

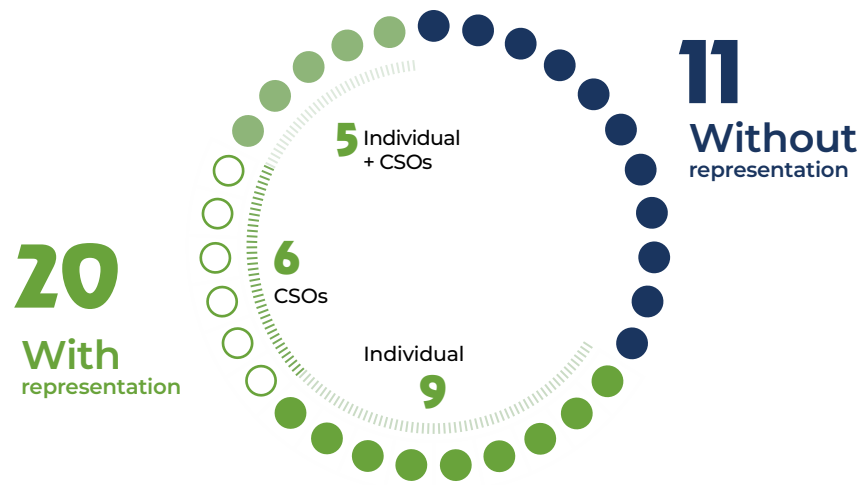
Most of the 31 complaints processed in 2024 were filed by individuals (16 in total). Of the remainder, 11 were submitted by community groups and 4 by Indigenous communities.

Complaints managed in 2024, by type of complainant



For most of the complaints (20 out of 31), complainants submitted their request with support from either a CSO or an individual representative who advised them. CSOs were involved in 11 cases (35% of the total), while in 9 cases, the representative was an individual.

Complaints managed in 2024 by representation



Complaints received in 2024

As in previous years, most of the new complaints in 2024 (8 out of 12) were filed directly by individuals. Two complaints were submitted with the support of CSOs, a proportional increase compared to previous years. Two other complaints were filed with assistance from an individual representative.

What type of harm is alleged?

The most frequently alleged impact in 2024 was effects on living conditions, cited in 25 out of 31 complaints. This is followed by environmental damage (20 complaints), patrimonial impacts (17), and effects on health (13). Compared to previous years, allegations of environmental damage have increased, surpassing patrimonial impacts to become the second most common cause of complaints.

Complaints managed in 2024 by alleged harm

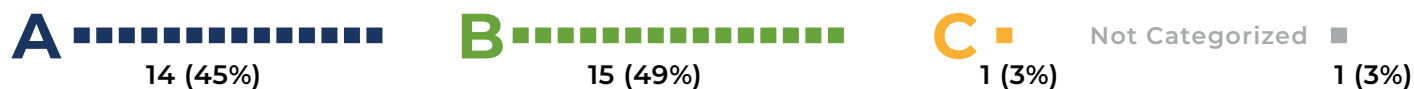


Note: The total number of alleged damages exceeds the total number of complaints (31) because the same complaint can include multiple types of damages.

What environmental risks do the projects pose?

Almost half of the complaints (15 out of 31) relate to projects classified as posing a medium level of environmental risk (Category "B"), characterized by localized, short-term impacts for which effective mitigation measures are known. On the other hand, 14 complaints refer to Category "A" operations, which can potentially cause higher environmental and social impacts or have significant implications affecting natural resources. Compared with 2023, the proportion of Category "A" projects rose by 10 percentage points.

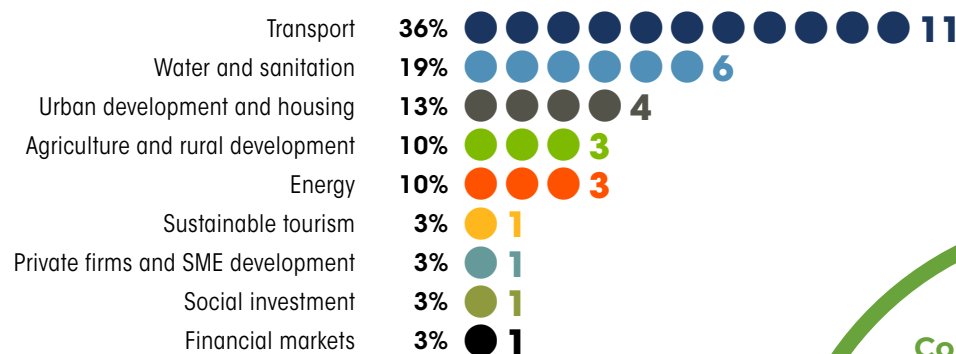
Complaints managed in 2024 by environmental category



What sectors are involved in the complaints?

By sector, the projects with the most complaints in 2024 were Transport (11 cases), Water and Sanitation (6 cases), and Urban Development and Housing (5 cases). Although the percentage distribution across sectors has varied compared to previous years, there has been no change in the ranking of sectors in terms of the total number of cases processed compared with 2023.

Complaints managed in 2024 by sector



Most of the complaints (23) are related to IDB projects with governments and public administrations. The other eight involve private sector projects, including seven financed by IDB Invest and one by IDB Lab.

Nearly all the new complaints registered in 2024 (11 out of 12) correspond to IDB projects, while only 1 relates to an IDB Invest operation.

Complaints received in 2024

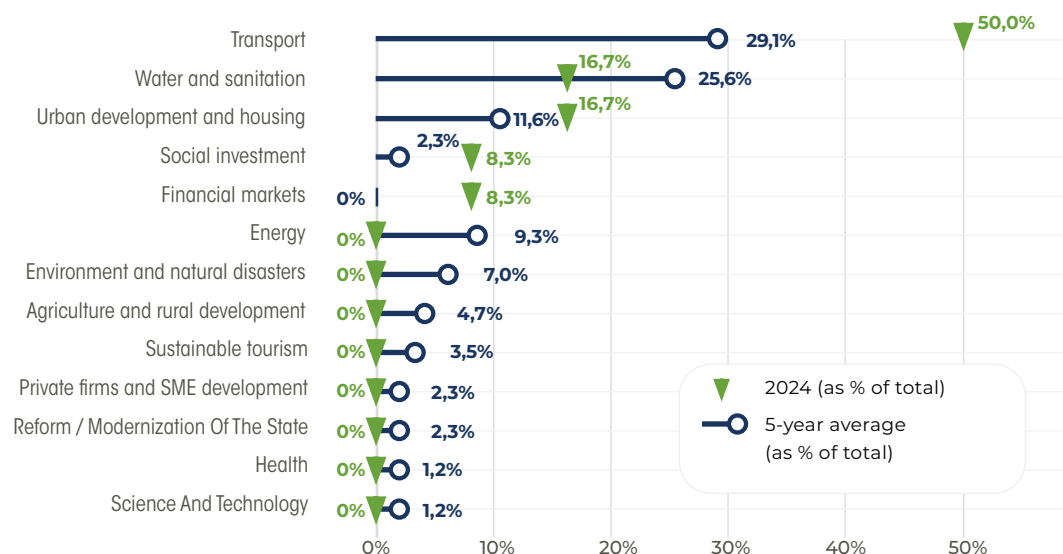
Analyzing only the complaints received in 2024, the Transport sector accounts for half of the new complaints (6 out of 12). Meanwhile, the Water and Sanitation and the Urban Development and Housing sectors accounted for two complaints each.

Annual comparison of new complaints

To facilitate the comparative analysis of complaints received each year, this report introduces a new methodology compared to previous annual reports. In addition to charts depicting the managed complaints portfolio –which includes both ongoing cases and newly received complaints– this section presents two charts that focus exclusively on new complaints received each year. To improve readability, these graphs compare the complaints received in 2024 with the five-year average, expressed in percentages.

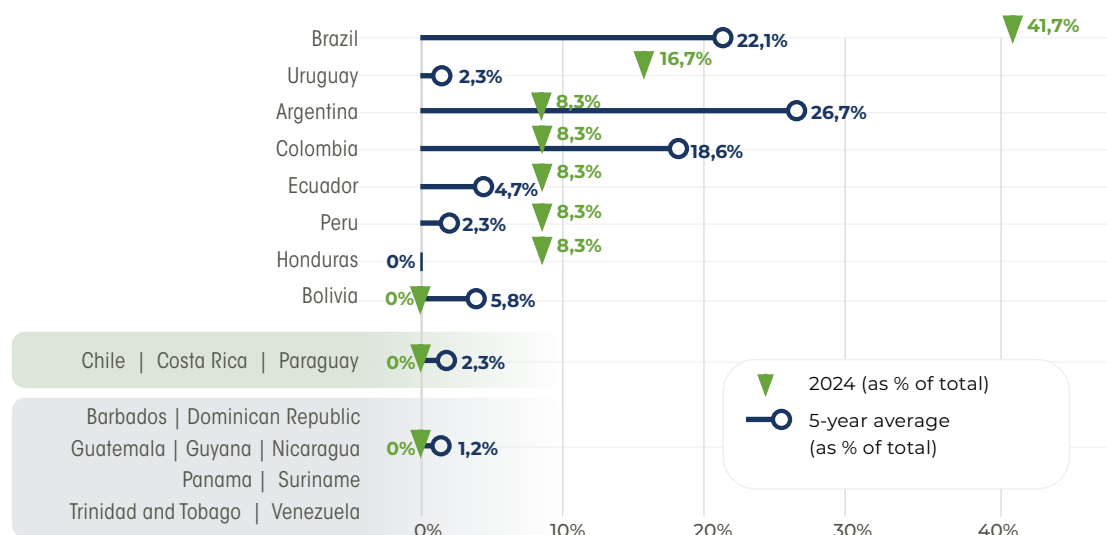
Annual complaints by sector

The Transport, Social Investment, and Financial Markets sectors saw an increase in complaints compared to previous years. Notably, 50% of all complaints in 2024 were related to the Transport sector, significantly higher than its five-year average (29.1%). This rise in Transport-related cases leads to a decrease in complaints related to Water and Sanitation, which dropped nearly 9 points below its average.



Annual complaints by country

In 2024, Brazil, Uruguay, Honduras, and Peru remained above their five-year averages, while Argentina, Ecuador, and Colombia saw proportional decreases. Brazil, which received the highest number of new complaints in 2024, saw an increase of nearly 20 percentage points compared to its historical trend.



Processing of complaints involving a risk of reprisals

MICI has a zero-tolerance policy for any form of reprisal against persons or organizations for having filed a complaint or attempted to gain access to MICI.

In 2019, after noting an increase in the number of complainants reporting reprisals, MICI decided to publish a practical toolkit for all independent accountability mechanisms on ways of dealing with these kinds of situations. A year later, MICI put operational guidelines in place with standards and principles applying to all MICI processes, to handle these situations effectively.

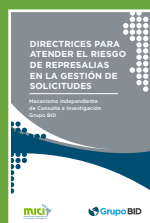


Risk of reprisals in complaints processed in 2024

In 8 of the 11 complaints processed in 2024 (25.8%), the complainants stated that they feared reprisals for having approached MICI and requested that their identities be kept confidential. In such situations, requesters are not required to have previously contacted other entities within the IDB Group, and MICI shields their identities at all stages of the process.



Guide for Independent Accountability Mechanisms on Measures to Address the Risk of Reprisals in Complaint Management



Guidelines for Addressing Risk of Reprisals in Complaint Management

Complaint management in **2024**, case by case



Cases managed in the

Consultation Phase



The Consultation Phase is the tool MICI offers to attempt to resolve the complaint presented by the communities through dispute resolution. First, the Phase analyzes the feasibility of carrying out a dialogue process between the complainants, the borrower, and the IDB Group. MICI facilitates the negotiation and if an agreement is reached, it monitors its implementation.

Haiti | MICI-BID-HA-2017-0114

Productive Infrastructure Program — Request II

Active — Monitoring of agreements



The IDB is financing the construction of the Caracol Industrial Park (PIC), which is located near the communities of Caracol, Limonade, Trou du Nord, and Terrier Rouge, as well as the development of Haiti's northern region through various grant operations, in order to promote private investment and new job creation.

Kolektif Peyizan Tè Chabè, a farmers' collective of approximately 420 families, filed a complaint with the representation and support of the Accountability Counsel, ActionAid Haiti, and Action pour la Reforestation et la Défense de l'Environnement (AREDE). The request states that the construction of the PIC perimeter fence without prior notice blocked the complainants' access to the plots of land that they farmed and relied on for their livelihoods. The complainants allege that the consultation process was carried out belatedly, on the basis of insufficient information, and with organizations that did not represent them. They also state that the amounts of compensation that they received were insufficient, and they are living hand-to-mouth. They state that they cannot ensure their families' food security because of their loss of income and that their children have dropped out of school because they were unable to pay the school fees. The women say that they are particularly exposed to the adverse consequences of economic displacement for their families.

Grant Operation: HA-L1055

Environmental Category: A

Sector: Urban development and housing

IDB Financing: 55,000,000 USD

i More information and public documents:

<https://mici.iadb.org/en/cases/MICI-BID-HA-2017-0114>





Despite the difficulties, the agreement continues to be implemented.



In 2024, five property titles were delivered.

MICI management in 2024

During 2024, MICI continued monitoring, for the sixth consecutive year, the implementation of the commitments agreed to between the parties in December 2018. To this end, in September 2023, the Board of Executive Directors approved an extension of the monitoring stage, which has a maximum duration of five years in accordance with the Mechanism's Policy.

One of the central components of the agreement is ensuring access to land for the requesters. In 2024, five land titles were delivered in addition to the 50 delivered in the first five years of monitoring. This commitment holds great symbolic value for the requesters, with 11 titles still pending delivery. Despite the importance of these achievements, high levels of insecurity, coupled with the ongoing political instability, have caused significant delays in land-title distribution and the other key components of the agreement. This includes the signing of contracts for the distribution of agricultural equipment, the implementation of the small business development program, and training initiatives to improve employment access within the Caracol Industrial Park. In September, the passing of Alix Clément, who had represented the executing agency in the MICI process since its inception and was directly responsible for implementing the agreement, added a further element of complexity to the process.

At the request of the complainants, MICI requested that the Board extend the monitoring period for an additional year to ensure the full implementation of the agreement.

Highlights

Haiti's political and social instability have made implementing the agreement extremely challenging. However, despite these difficulties, six years of monitoring have resulted in significant progress on the agreement, as a result of the strong commitment and flexibility of the parties involved.

Argentina | MICI-BID-AR-2019-0148

Reconquista River Basin Environmental Sanitation Program — Request III

Active — Monitoring of agreements



This IDB loan operation is aimed at restoring the environmental quality of the Reconquista River basin, the second most polluted in the country, through the implementation of a comprehensive management plan. The plan prioritizes investments for improving solid waste management; increasing water, sewer, and wastewater treatment coverage; improving connectivity and access to outlying neighborhoods; and strengthening the operational management capacity of the Reconquista River Basin Committee (COMIREC).

The complaint was filed by residents of several communities of the river basin in the provinces of Buenos Aires and Tigre, who allege that the program has failed to consider the basin as a territorial unit and the river's capacity as a receiving body. They report high levels of pollution and negative impacts on the quality of life and health of the inhabitants of the lower basin, which could worsen further if the issue of industrial and sewage pollution is not considered. They also cite the effects of the construction of the Drainage Canal/National Rowing Course, which altered water flows and made the delta the final destination of highly polluted water. They further allege that they have not had access to relevant information, nor has there been any consultation or participatory process for engagement of the affected population.

Loan Operation: AR-L1121

Environmental Category: A

Sector: Water and sanitation

IDB Financing: 230,000,000 USD

i More information and public documents:

<https://mici.iadb.org/en/cases/MICI-BID-AR-2019-0148>





Monitoring mission meetings in December 2024.



MICI management in 2024

The complaint has been under agreement monitoring since 2019. In 2024, the executing agency and COMIREC shared information on water quality monitoring at 77% of the agreed-upon points, as well as on the mapping of industrial waste sites. However, regarding the key component of the agreement—an intervention to address pollution in the delta—no measures have been implemented yet, despite the fact that MICI facilitated engagement of the National Water Institute (INA) to conduct a study on alternative works. In 2024, the INA delivered its final report, analyzing the impact of the Reconquista River on the water quality of the delta islands. The study concluded that the river accounts for between 3% and 8% of the pollution of the delta. It also suggested that a level spillway could improve water quality, although complementary studies are still needed.

Highlights

In December 2024, during monitoring mission meetings facilitated by MICI in Argentina, the parties renewed their commitment to continue working on resolving the requesters' concerns. Thus, they signed an agreement in which COMIREC commits to implement six actions that replace point 1 of the agreement signed in 2019. They also asked MICI to extend the monitoring stage for an additional year and a half to follow up the implementation of the measures included in the amended agreement.

Argentina | MICI-BID-AR-2021-0164

Development Program For Metropolitan Areas Outside the Capital II

Active — Monitoring of agreements



Agreement monitoring mission in December 2024.

The IDB is supporting the plan for the restructuring of the complex comprising the Eva Perón Teaching Hospital and Juan Domingo Perón Boarding School in the Province of Santa Fe, Argentina, through a loan for the Development Program for Metropolitan Areas Outside the Capital II. The objective of the project is to enhance and rehabilitate a 53-hectare site in the city's downtown area that is of historical and environmental value and of urban planning interest. The works include water, sewer, gas, and electricity infrastructure, street lighting, street furniture, the creation of stormwater reservoirs, and the afforestation of green areas.

In February 2021, 81 municipal residents, who requested confidentiality, filed a complaint with MICI alleging negative environmental, health, and historical heritage impacts linked to the complex. According to the requesters, these impacts were not correctly identified before the intervention, nor were adequate consultation, information disclosure, and public communication processes carried out for the population affected by the project.

Loan Operation: AR-L1243

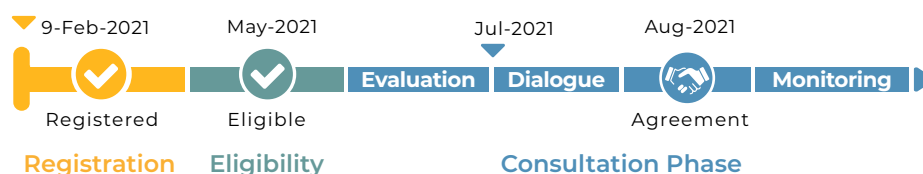
Environmental Category: B

Sector: Urban development and housing

IDB Financing: 40,000,000 USD

 More information and public documents:

<https://mici.iadb.org/en/cases/MICI-BID-AR-2021-0164>





Agreement monitoring mission in December 2024.



MICI management in 2024

During 2024, MICI continued to monitor the agreement signed in 2021. While a significant part of the commitments has been fulfilled, progress is still needed to implement several important elements. These include increasing the number of tree species to be planted, transferring streets to the Municipality of Granadero Baigorria (where the property in question has been designated as a public green space for recreational, sports, and cultural use), and incorporating the local community into the site's management consortium.

Throughout the year, the Mechanism held more than 10 bilateral meetings with requesters. Additionally, in December 2024, it conducted a face-to-face monitoring mission in Granadero Baigorria, where the status of the agreements was assessed, and the next steps for full compliance were analyzed.



Argentina | MICI-BID-AR-2021-0170

Integrated Urban Solid Waste Management Program — Request II

Active — Monitoring of agreements



The objective of the Chascomús Environmental Eco Park project is to clean up and close the Chascomús landfill in the Province of Buenos Aires, Argentina, and to open an Eco Park designed to achieve the maximum recovery of materials and the minimum final disposal of waste. The Bank is financing a loan for US\$150 million of the project's US\$187 million cost.

In July 2021, 30 residents of Chascomús, who requested that their identities be kept confidential, filed a complaint alleging potential environmental harm to the community, their health, and their property and economy, with a differentiated impact on the livelihoods of some women producers, farmers, and livestock breeders. Their main concerns are the drainage capacity of the land where the Eco Park is slated to be built, the potential pollution of the region's wetland system, the impact on water wells, the potential loss of value and productive capacity of neighboring properties, and the potential impacts on native fauna.

Loan Operation: AR-L1151
 Environmental Category: B
 Sector: Water and sanitation
 IDB Financing: 150,000,000 USD

i More information and public documents:

<https://mici.iadb.org/en/cases/MICI-BID-AR-2021-0170>





MICI's meeting with a group of requesters.



Photo by Martin Gallino.

MICI management in 2024

Since July 2023, MICI has been monitoring the implementation of the agreement between the parties. This period, particularly from December 2023 onward, coincided with a change in Argentina's national government, which decided to pause public works projects reliant on national funds and review loans from international organizations to align public spending and development projects with the new administration's goals. As a result, construction on the project that is the subject of this case has not started, and the IDB has not disbursed any funds since September 2023.

In this context, the Mechanism held bilateral communication with the parties to learn about their perspectives on the progress of the implementation of the agreement. In August 2024, the Consultation Phase issued its first monitoring report, concluding that the IDB and the executing agency had fulfilled the commitments related to the inclusion of studies, information, and specific considerations in the Environmental and Social Impact Assessment (ESIA). However, due to the pause in project implementation, a set of commitments associated with the project's construction and operation remain pending. Among these is, for example, effective monitoring of water wells.

In December 2024, MICI held meetings with the IDB, the executing agency, and the requesters as part of a monitoring mission in Argentina.

Costa Rica | MICI-BID-CR-2021-0171

Cantonal Road Network II Program

Closed after the implementation of the agreements

The specific objectives of the IDB-financed Cantonal Road Network Program II are to improve the cantonal road network by means of rehabilitation and maintenance works that include a climate change adaptation component, resulting in shorter travel times and lower operating costs, and to strengthen the institutions responsible for road network management.

A group of 28 residents of the Canton of Buenos Aires, Province of Puntarenas, Costa Rica, filed a complaint concerning the implementation of two projects included in the program. The request describes the program's impact on their living conditions as a result of damage to the access roads to the Indigenous territories of Salitre and Ujarrás and other roads in the canton's road network; the socioenvironmental impacts of the installation of a rock crusher; and a lack of public information and community engagement mechanisms.

MICI management in 2024

On 27 June 2024, following a visit to the program's area of influence, the processing of the complaint concluded after verifying full compliance with the agreement reached in 2021. This agreement facilitated the repair and improvement of roads affected during the construction of the project, restoring mobility for several localities and Indigenous communities in the canton of Buenos Aires.

During the visit, the Consultation Phase held bilateral meetings with the parties and inspected the four roads covered by the MICI agreement to assess their condition, confirming that all of the agreed-upon measures had been fully implemented.



Highlights

In addition to having addressed the complainants' specific concerns, the management of this case led to positive changes and valuable lessons learned within the executing agency. These improvements include better management of confidential information, enhanced bidding processes, and stronger engagement with communities in areas of influence of infrastructure projects to mitigate social and environmental impacts.



For more information:
[Reconnecting communities through dialogue](#)

Loan Operation: CR-L1065
Environmental Category: B
Sector: Transport
IDB Financing: 144,036,000 USD

i More information and public documents:
<https://mici.iadb.org/en/cases/MICI-BID-CR-2021-0171>



Argentina | MICI-BID-AR-2022-0188

Reconquista River Basin Environmental Sanitation Program — Request V

Active — Monitoring of agreements

The program, which is financed through an IDB loan, seeks to restore the environmental quality of the Reconquista River Basin. The request relates to the “Branch Sewer Systems in Moreno: Catonas IV North and South” project under the program, to be built in the Moreno District in the river’s middle basin. The project involves building a system of sewers and collectors up to a discharge point at an existing collector for final conveyance to an effluent treatment plant.

On 8 July 2022, a group of 60 residents of Villa Anita, Moreno District, Province of Buenos Aires, accompanied by the federal prosecutor for the Moreno District, filed a complaint with MICI. They alleged potential harm to their quality of life, deterioration of public spaces, and lack of access to public services due to the halt in construction on Section 2 of the project.

MICI management in 2024

During the first quarter of 2024, MICI facilitated multiple bilateral discussions that led to the signing of an agreement between the parties on 7 May 2024. The agreement contemplates the completion of the Branch Sewer Networks project in Moreno Catonas IV South, with an execution period of 13 months. According to the latest quarterly progress report, as of September 2024, 12% of the works had been completed.

In December 2024, as part of a mission to Argentina, MICI facilitated a joint site visit to the project, with the participation of provincial authorities and representatives of the complainants’ group, who were accompanied by the federal prosecutor for the Moreno District. During this visit, MICI verified considerable progress in the works, which will provide sewer services to approximately 13,000 inhabitants of the Moreno District and are expected to be completed in the second half of 2025. Additionally, provincial officials addressed all the questions from the complainants and informed them that the next progress report would be shared by the end of January 2025.



Loan Operation: AR-L1121

Environmental Category: A

Sector: Water and sanitation

IDB Financing: 230,000,000 USD

i More information and public documents:

<https://mici.iadb.org/en/cases/MICI-BID-AR-2022-0188>



Colombia | MICI-BID-CO-2022-0192

Metro of Bogota First Line - First Tranch — Request V

Active — In dialogue process

In this operation, the IDB is offering technical assistance and supporting the financing of the startup of works for the first line of the Bogota Metro through two components: preparatory activities, civil works, and inspections; and environmental and social management of the project.

On August 2022, MICI received a request from three individuals who own an automobile service station business in the San Bernardo area of downtown Bogota.

The requesters allege potential harm to their living conditions and property stemming from the expropriation of their service station to make way for the construction of the metro. They also allege a lack of information and contradictions in their communications with the executing agency that have produced uncertainty about their future.

MICI management in 2024

In July 2023, MICI determined that the necessary conditions existed to initiate a dialogue process between the parties. However, the process could not begin until May 2024, due to various contextual factors, including the ongoing pretrial mediation process; the 2023 local elections in Bogota; changes in the property management team of the Bogota Metro company, and the statement issued by the District Secretariat of the Environment of Bogota regarding the dismantling of the service station owned by the requesters.

MICI recognized that the limited time remaining in the dialogue stage would limit the ability of the parties to adjust their positions and gather the necessary documentary evidence for an effective and final negotiation. Despite this challenge, the parties reaffirmed their commitment to resolving the dispute through dialogue. As a result, the dialogue stage has been extended twice and now runs through mid-April 2025.

Loan Operation: CO-L1234

Environmental Category: A

Sector: Transport

IDB Financing: 70,000,000 USD

 More information and public documents:

<https://mici.iadb.org/en/cases/MICI-BID-CO-2022-0192>



Highlights

This case has demonstrated that, in some situations, extending pre-established dialogue periods can be beneficial, allowing for the adaptation to dynamic contexts and facilitating resolutions that align with the interests of all parties involved.



Enhancing the Ecosystem for Entrepreneurship and Innovation in Bolivia — Request II

Active — Monitoring of agreements

The main objective of this IDB Lab technical cooperation project is to empower the entrepreneurship and innovation ecosystem in Bolivia by promoting innovative business ventures, events for increased connections among operators, and expanded service offerings for entrepreneurs.

The complaint was filed by a group of requesters who asked that their identities be kept confidential. They alleged harm due to gender-based discrimination and censorship actions in the workplace and contended that this situation has had negative impacts on their living conditions.

MICI management in 2024

In December 2023, the parties reached an agreement that includes actions related to gender equality, which the client and IDB Lab's Management committed to implementing within the framework of potential IDB Lab financing operations. However, during the first year of monitoring, there were no operations in preparation or implementation.

Highlights

MICI has maintained an open channel of communication with the parties to identify any potential risks to the agreement. As part of its monitoring activities, MICI facilitated a meeting in Santa Cruz de la Sierra between the representative of the group of complainants and IDB Lab. Additionally, MICI held a separate meeting with IDB Lab and its client. These meetings provided an opportunity to jointly assess the status of agreement compliance and enhance the transparency of the process. It should be noted that, in this case, no plenary sessions have been held, as the complainants had requested.

Technical Cooperation: BO-T1346

Environmental Category: C

Sector: Private firms and SME development

IDB Lab Financing: 750,000 USD

 More information and public documents:

<https://mici.iadb.org/en/cases/MICI-BID-BO-2023-0214>



Brazil | MICI-BID-BR-2023-0216

Curitiba's Sustainable Urban Mobility Program — Request II

Active — Monitoring of agreements



The project is a multiple-works operation to improve urban mobility in the city of Curitiba, State of Paraná, Brazil, via the mass public transport system.

The complaint was submitted in July by a group of residents of Curitiba, who allege potential harm to their living conditions stemming from their eviction from a commercial property. They further allege that the project is only compensating the owners, without providing for any payment for loss of potential earnings or for the relocation of the occupants or leaseholders. This request is linked to complaint MICI-BID-BR20230213, which was not registered because no prior contact had been made with IDB Management. The group of complainants decided to turn to MICI a second time because they believed their concerns had not been resolved.

MICI management in 2024

This case has been in the monitoring stage since December 2023, when the parties agreed on a set of accompanying measures that would ensure that the complainants' business transition to a new property was efficient, well-planned, and would minimize the impact on their productive activities.

Throughout 2024, the parties agreed to extend the deadline for the delivery of the expropriated property. During this time, the complainants successfully identified a suitable new location and managed to reopen their business.

Loan Operation: BR-L1532

Environmental Category: B

Sector: Transport

IDB Financing: 133,400,000 USD

i More information and public documents:

<https://mici.iadb.org/en/cases/MICI-BID-BR-2023-0216>





Highlights

During the negotiation process, the parties agreed that, since the dispute had been resolved with MICI's facilitation, all ongoing processes with other authorities would be terminated. As a result, the legal process previously underway in the courts of the State of Paraná was suspended. However, the judge decided to attach the MICI agreement to the case file and keep the process open until the agreement between the parties has been fully implemented.



Rural Land Regularization and Titling Program

Active — In dialogue process



The IDB-financed operation consists of a program for land regularization, titling, administration, and registration in Bolivia with the objective of increasing the legal certainty over rural property. The program beneficiaries are small and medium-sized agricultural producers and Indigenous communities.

The group of requesters, who have asked that their identities be kept confidential, allege potential harm to the living conditions and heritage of Indigenous communities throughout the country, potentially linked to incomplete and flawed land titling and management processes that were not transparent and did not provide for fair compensation.

Additionally, they allege potential environmental harm resulting from the conversion of forest land into farmland, a process involving the clearing of land, use of fire, and soil depletion. They claim that these changes in land management and use have had a negative impact on the traditional ways in which these communities use their territories. They further allege that information about the operation has not been made accessible to the communities, nor have meaningful public consultations been held with the population affected by the operation.

MICI management in 2024

In February 2024, MICI declared the request eligible and initiated the assessment stage of the Consultation Phase. In addition to holding several bilateral meetings with the parties, the Phase carried out a mission to Santa Cruz de la Sierra and La Paz in March, where it conducted extensive interviews with all parties and other relevant stakeholders. On 2 April 2024, MICI concluded that the necessary technical conditions and the willingness of the parties were in place to initiate a dispute resolution process.

Loan Operation: BO-L1113

Environmental Category: A

Sector: Agriculture and rural development

IDB Financing: 100,000,000 USD

 More information and public documents:

<https://mici.iadb.org/en/cases/MICI-BID-BO-2023-0225>





Negotiation sessions at IDB offices in La Paz.



Between April and November, the Mechanism conducted four missions to the cities of Santa Cruz de la Sierra, La Paz, and Rurrenabaque, to advance the dispute resolution process. Following MICI's proposed methodology, separate dialogue sessions were held to individually address the problems of each Indigenous group. Additionally, the Mechanism facilitated more than 25 virtual bilateral meetings with the parties. Despite a sensitive and volatile political, social, and economic context, it has been possible to establish a strong institutional framework for dialogue, fostering a positive and constructive work dynamic between the parties.

Highlights

To fully understand this request, it is important to highlight three elements: (a) two of the four complainant Indigenous peoples initiated their land titling claims with the State of Bolivia more than 20 years ago. Of the remaining two, one began its first legal claim 11 years ago, while the other has been advocating for territorial recognition through various means since 2016, formally submitting its land titling claims to INRA in 2020 and 2021; (b) two of the four complainant Indigenous peoples, the Tsimane and the Esse Ejja, have been classified as highly vulnerable by institutions of the Plurinational State of Bolivia, including the Ombudsperson's Office; and (c) while the four cases presented in the MICI request differ significantly in their historical background and specific circumstances, they share a common central demand: access to land and territory under the legal status of Indigenous Native Peasant Lands.

This request is particularly complex, as it brings together four Indigenous peoples, each claiming access to land and territory. Each group presents distinct challenges regarding the number of hectares claimed, the status of their legal proceedings before the Bolivian state, their level of internal organization, and their geographical dispersion—with one group in Santa Cruz, two in northern La Paz, and another in Beni. Additionally, each group has its own leaders and representatives participating in the dialogue. Due to these complexities, the Consultation Phase has adopted a specific methodology, addressing each group's case separately through dedicated dialogue sessions, without the intervention of other groups. In practice, MICI is managing four simultaneous dispute resolution processes within a single request.

Ecuador | MICI-BID-EC-2024-0229

Sustainable Development and Biodiversity Program in Ecuador

Active — Monitoring of agreements

The program consists of a policy-based guarantee aimed at assisting Ecuador in a debt-for-nature swap while generating savings to finance conservation activities in the Galapagos Islands.

The operation supports a series of reforms that include, among other objectives, the creation of a conservation fund, the *Galapagos Life Fund* (GLF). This fund is responsible for providing grants to governmental and nongovernmental organizations as well as individuals, in alignment with funding priorities based on local conservation needs.

The complainants, who have requested confidentiality, allege that accessible and relevant information about the program is lacking. They also claim that there is no communication or engagement strategy to effectively inform Galapagos Islands communities in a timely and transparent manner about the conservation initiatives and projects that the *Galapagos Life Fund* intends to implement.

MICI management in 2024

MICI conducted an eligibility mission to visit the project area and hold meetings with the complainants, the executing agency, and other relevant actors. In September 2024, the complaint was declared eligible and transferred to the Consultation Phase.

Given the specific needs of the case, the Phase team proposed a streamlined process that combined the assessment and dispute resolution stages. Following multiple exchanges, MICI facilitated the codevelopment of a proposal that addressed the complainants' concerns. Based on this proposal, in November 2024 the parties reached an agreement that aims to strengthen the governance of the *Galapagos Life Fund* and ensure that local communities have public and constant access to project-related information.

Policy-Based Guarantee: EC-U0005

Environmental Category: Not categorized

Sector: Financial markets

IDB Financing: 85,000,000 USD

i More information and public documents:

<https://mici.iadb.org/en/cases/MICI-BID-EC-2024-0229>



Highlights

Flexibility played a central role in reaching an agreement in this case. From the eligibility stage, key information was gathered to assess the feasibility of a dialogue process, structure its design, and identify the needs and interests of the parties. This approach helped the parties reach a resolution efficiently. As a result, MICI was able to facilitate an agreement in just two months by integrating the assessment and dialogue stages into a single process.



Brazil | MICI-BID-BR-2024-0230

Social and Environmental Program of Manaus and the Interior - PROSAMIN

Active — Monitoring of agreements

The program aims to improve the socioeconomic and health conditions of the population in the Igarapé do Quarenta sub-basin, located in the Brazilian city of Manaus. Among its objectives are increasing access to drinking water services and reducing the risk of flooding.

The group of complainants, who requested confidentiality, alleges that the resettlement process implemented under the program negatively impacted their livelihoods and assets. They state that, during the preparation of the program's cadastral survey, they were not in the area due to COVID-19-related restrictions. However, they claim that in November 2021, PROSAMIN+ personnel visited their homes and registered them. Despite this, they allege that in January 2023, they were evicted through police procedures without receiving the assistance that they had been promised. According to the complainants, the eviction process involved the use of violence and threats. Similarly, they state that the vulnerabilities of their family members were not considered.

MICI management in 2024

MICI registered this complaint in June 2024 and declared it eligible in July, after verifying that it met all the requirements established in the MICI Policy. The case was transferred to the Consultation Phase, which held multiple virtual conversations with each party. During these meetings, the complainants agreed to allow MICI to share their identities with the executing agency and the IDB but expressed their preference to avoid plenary meetings.

In August 2024, the Consultation Phase team traveled to Manaus to further explore potential solutions to the concerns raised in the complaint. As a result, on 29 August, MICI facilitated the signing of an agreement, the details of which remain confidential by mutual decision of the parties.

The agreement includes four specific actions, with the primary measure fully completed in September 2024. MICI will continue to monitor the implementation of the remaining actions.

Loan Operation: BR-L1553

Environmental Category: A

Sector: Water and sanitation

IDB Financing: 114,285,730 USD

i More information and public documents:

<https://mici.iadb.org/en/cases/MICI-BID-BR-2024-0230>



Highlights

MICI's work has been instrumental in conveying concerns and helping the parties find mutually acceptable solutions. Likewise, MICI sought to address existing asymmetries between the parties to facilitate a fair and balanced agreement.





Cases managed in the

Compliance Review Phase



The Compliance Review Phase conducts independent investigations into community complaints to determine whether the IDB Group met its environmental, social, and access to information standards in a project. This process consists of three stages: assessing whether to proceed with a compliance review, conducting the investigation, and monitoring the implementation of corrective actions identified through the investigation.

Peru | MICI-PE-2015-0094

Rural Land Titling and Registration Project in Peru – Third Phase (PTRT-3)

Active — Awaiting for Management's action plan



The complaint refers to the third phase of the Rural Land Cadastre, Titling, and Registration Project in Peru (PTRT-3) to enhance the security of rural land tenure in Peru, benefiting 220,000 agricultural producers, 190 campesino communities, and 403 native communities.

The complaint was submitted by the Interethnic Association for the Development of the Peruvian Amazon (AIDESEP), representing 64 Indigenous peoples and 1,809 communities in Peru's Amazon region. The request alleges that the execution of the project will cause irreparable harm to Indigenous peoples and will violate their property and usage rights to Indigenous territories by addressing the granting of land titles to settlers first. The complainants also allege environmental and socioeconomic harm such as the deforestation of ancestral lands, degradation of ecosystems, and Indigenous peoples' loss of livelihoods as a result of potential noncompliance with the Environment and Safeguards Compliance Policy (Operational Policy 703) and the Indigenous Peoples Policy (OP765).

MICI management in 2024

The Compliance Review process concluded in May 2024. In July, MICI presented the findings, conclusions, and recommendations of the investigation to the Board of Executive Directors. The investigation identified both compliance and noncompliance in four fundamental areas: the management of the consultation and participation processes with Indigenous peoples; the classification of the project's environmental category; the assessment of the institutional capacity to effectively manage the associated impacts and risks; and, finally, the correct identification of the project's environmental risks and impacts.

Loan Operation: PE-L1026

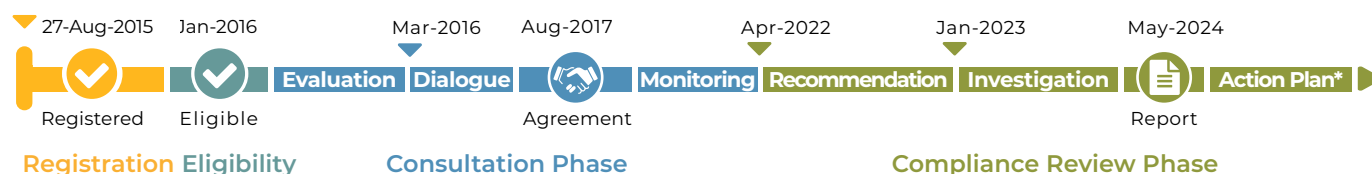
Environmental Category: A

Sector: Agriculture and rural development

IDB Financing: 40,000,000 USD

More information and public documents:

<https://mici.iadb.org/en/cases/MICI-PE-2015-0094>



*The preparation of the action plan is responsibility of the IDB.



Loreto is the Peruvian region with the greatest diversity of ethnic groups and indigenous languages. Photo by Diego Luna.



Meetings of the investigation panel in Peru, in 2023.

The Board approved all nine recommendations made by MICI to strengthen the institutional capacities of the IDB and enhance the protection of biodiversity in the Amazon Basin.

The Board also instructed the IDB to develop an action plan to address MICI's recommendations. The Bank prepared this plan in consultation with MICI, which enabled the Phase to provide its perspective about the plan through several exchange meetings. The Bank submitted its plan in December 2024, and the Board is scheduled to consider it in 2025. If approved, MICI will monitor its implementation for a maximum period of five years.

Highlights

Throughout the investigation, MICI's ongoing communication with both the complainants and IDB Management was essential to propose recommendations that contribute to institutional learning and strengthen the sustainability of land titling projects in Indigenous communities. In addition, one of the recommendations emphasized the importance of Indigenous communities' participatory element and the need to strengthen their role in monitoring activities.



← [Download the investigation summary.](#)

Colombia | MICI-CII-CO-2018-0133 IDB Invest

Ituango Hydropower Plant

Active — Monitoring of Management's action plan



The Ituango Hydropower Plant, which is now in operation, has a generating capacity of 2,400 megawatts. It harnesses the flow of the middle stretch of the Cauca River in the Department of Antioquia, some 170 kilometers from Medellín. IDB Invest financed the project with a corporate loan operation that began in 2016.

A complaint was submitted to MICI by 477 residents of nine municipios (Briceño, Ituango, Toledo, Peque, Sabanalarga, Valdivia, Caucasia, San Andrés de Cuerquia, and Sopetrán) in the Department of Antioquia, Colombia, represented by the organization Movimiento Ríos Vivos and joined in the complaint process by three civil society organizations: Center for International Environmental Law (CIEL), Interamerican Association for Environmental Defense (AIDA), and International Accountability Project (IAP).

In their complaint, they allege current and potential impacts of the project's construction and operation related to the identification of the target area and affected population; poor management of disaster risks; increased conflict, insecurity, and violence in the area; and gender-differentiated impacts. They also claim that no adequate public consultations and participatory mechanisms or appropriate plans for resettlement or compensation for physical and economic displacement were in place.

Loan Operation: 11794-04
 Environmental Category: A
 Sector: Energy
 IDB Invest Financing: 400,000,000 USD
 More information and public documents:
<https://mici.iadb.org/en/cases/MICI-CII-CO-2018-0133>



*The preparation of the action plan is responsibility of IDB Invest.



MICI management in 2024

In June 2024, the Board of Executive Directors approved IDB Invest's action plan to implement the 15 recommendations made by the Phase in its Compliance Review report. Between June and December, MICI, in consultation with the parties, developed a plan to monitor the action plan and submitted it to the Board for informational purposes.

A particularly notable feature of the action plan is Recommendation 15.4, which should be implemented jointly by IDB Invest and the communities. The goal is to carry out a concrete and enduring initiative that recognizes and preserves the ancestral traditions in the Cauca River canyon, ensuring that its history and cultural significance are passed down to future generations. To this end, MICI hired a facilitator who has held five meetings with each party so far, guiding the discussions to define the joint action.

Generadora San Mateo S.A. and Generadora San Andrés S.A.

Active — Monitoring of Management's action plan



This project consists of the construction and operation of two run-of-river hydroelectric power plants, Generadora San Mateo S.A. (GSM) and Generadora San Andrés S.A. (GSA), financed by two IDB Invest loan operations. GSM will use the waters of the Negro and Pojom rivers, and GSA will use the waters of the Primavera, Varsovia, and Palmira rivers. Both projects are located in the municipio of San Mateo de Ixtatán, Department of Huehuetenango, Guatemala.

The complaint was submitted by residents of five communities (Ixquisis, Bella Linda, Yulchen Frontera, Nuevo San Mateo, and Pojom) in the Ixquisis microregion, who requested that their identities be kept confidential for fear of reprisals. They are represented by the Q'anjob'al, Popti, Chuj, Akateko, and Mestizo Plurinational Ancestral Government with the support of the Interamerican Association for Environmental Defense and the International Platform Against Impunity.

The complaint alleges that IDB Invest failed to fulfill its due diligence and supervision obligations, including the absence of a full environmental and social impact assessment or adequate procedures for consultation and access to information, considering the negative impacts on the interests and territory of Indigenous communities. The complaint also describes environmental harm to water bodies that would adversely affect the household and agricultural activities of the communities, as well as the culture and traditional way of life of the Indigenous peoples in the area, with gender-differentiated impacts.

Additionally, the complaint details a serious fear for personal safety, unraveling of the fabric of family and community life, and violence and reprisals against opponents of the projects as a consequence of a climate of confrontation that the complainants say began with the arrival of the hydroelectric projects.

Loan Operation: GU3794A-01, GU3798A-01

Environmental Category: B

Sector: Energy

IDB Invest Financing:

7,000,000 USD and 6,000,000 USD

i More information and public documents:

<https://mici.iadb.org/en/cases/MICI-CII-GU-2018-0136>

MICI Annual Report 2024



*The preparation of the action plan is responsibility of IDB Invest.



MICI management in 2024

In 2024, the Phase continued its second year of monitoring the implementation of IDB Invest's action plan, designed to address the recommendations from MICI's investigation. At the end of 2023, the complainants requested urgent measures from IDB Invest to mitigate environmental risks that they allege have arisen in Yich K'isis (Ixquisis) due to river diversions, damming, and the abandonment of project infrastructure. Following up on this exchange, in March MICI facilitated a meeting between the affected communities and IDB Invest to discuss these environmental concerns. During the meeting, the organizations supporting the requesters, along with representatives from various communities, presented their perspective on the risks and vulnerabilities they face. They also emphasized the need for IDB Invest to restore the pre-existing conditions in the territory as part of its obligations to responsibly exit the project. For its part, IDB Invest presented its point of view and the options available within the framework of the action plan.

In November, at the request of the complainants, MICI participated as an observer in a visit by IDB Invest to the communities. This visit was conducted as part of the action plan's implementation. The mission's objective was to listen to the communities and gather input for a study aimed at identifying damages, risks, and potential restoration measures for the abandoned infrastructure.

Highlights

As in previous years, MICI received information from the complainants about alleged retaliation. In response, MICI held meetings on the matter and, at the complainants' request, updated the joint retaliation risk reduction plan. In addition, considering the situation, MICI implemented measures including communications with IDB Group officials and international organizations, constant communication with all parties involved to prepare for IDB Invest's visit, and ongoing monitoring of the situation.

Colombia | MICI-CII-CO-2019-0152 IDB Invest

Ruta del Cacao 4G Toll Road

Active — Under investigation

IDB Invest is financing the Bucaramanga-Barrancabermeja-Yondó concession project, which is part of the second wave of the Fourth Generation of Concessions (4G Program) promoted by Colombia's National Infrastructure Agency under a public-private partnership arrangement. The project consists of a road interconnection between Bucaramanga and the western part of the Department of Santander, the municipality of Yondó (Department of Antioquia), and the Ruta del Sol II concession.

Several communities in the project target area submitted a complaint through the Ruta del Cacao 4G Toll Road Citizen Watch Group (VCRC-4G), alleging environmental harm from water, soil, and air pollution and harm to local flora and fauna associated with the construction and subsequent operation of the road. The complainants also alleged damage to dwellings and properties, economic harm to the merchants working along the route, and failure to properly compensate the property owners adversely affected by the project.

MICI management in 2024

In April, the investigation team conducted a field mission and held meetings and interviews with more than 25 people, including the requesters, IDB Invest, the client's executives, national authorities, and other stakeholders directly or indirectly involved with the project.

The Phase has continued its documentary analysis to finalize the investigation. After a deadline extension approved in September, the preliminary report is now scheduled to be shared with the parties for comments in February 2025.



Meeting of the investigation panel with requesters.

Loan Operation: 12252-01
Environmental Category: A
Sector: Transport

IDB Invest Financing: 375,000,000,000 COP

More information and public documents:

<https://mici.iadb.org/en/cases/MICI-CII-CO-2019-0152>



Argentina | MICI-BID-AR-2022-0182

Integrated Urban Solid Waste Management Program — Request IV

Active — Under investigation

The project relates to the Luján Environmental Center in the Province of Buenos Aires, Argentina, which is part of an IDB-financed multiple-works program. Its specific objective is to improve the quality and operation of waste management services in the area through the construction of a waste sorting plant and a final disposal module with facilities for collecting and treating leachates and capturing biogas. The project also provides for cleanup and closure of an open dump located on municipal land and a number of privately-owned lots.

The complaint was filed by a group of 60 residents of Luján regarding potential harm to the area's environment and cultural heritage, as well as to residents' health, property, and quality of life, which may be linked to the cleanup of the dump, which is currently still operating, and to the future construction and operation of a new sanitary landfill and ecopark.

MICI management in 2024

The investigation panel carried out its field mission in December 2023, and throughout 2024, the Phase has continued its investigative work. In November, MICI sent the preliminary report to the parties for comment, which will enable it to complete the final report and its recommendations. The Phase held a meeting with the complainants, facilitated by an independent mediator, to provide any necessary clarifications, resolve doubts, and gather their feedback on the preliminary report—particularly regarding the feasibility of the proposed recommendations. A similar meeting with the IDB is scheduled for January 2025, ensuring that the final version of the investigation report reflects the perspectives of all parties involved.

Loan Operation: AR-L1151

Environmental Category: B

Sector: Water and sanitation

IDB Financing: 150,000,000 USD

i More information and public documents:

<https://mici.iadb.org/en/cases/MICI-BID-AR-2022-0182>



Meeting during the investigation mission in December 2023.

Highlights

Several external factors have created a climate of uncertainty, directly impacting the implementation of the project, though they have not interfered with MICI's investigation. Two court rulings lifted the precautionary measure that had suspended the construction works for the landfill and the closure of the open-air dump, effectively confirming the resumption of the Luján Environmental Center project. However, at the end of the year, construction remains halted, with no official updates from the government or the Bank regarding the future of the project.

Brazil | MICI-BID-BR-2022-0189
National Tourism Development
Program - PRODETUR Nacional-Rio de Janeiro

Active — Under investigation

The IDB financed the PRODETUR Nacional-Rio de Janeiro program as part of its support for the tourism sector in Brazil. The State of Rio de Janeiro was the borrower, and the Federative Republic of Brazil was the guarantor for this operation, which was approved in 2010. The program sought to contribute to job growth and to an increase in the revenues and foreign exchange generated by the state's tourism sector. One of the projects under this program, the Project on Sanitation, Drainage, and Urban Development of Vila do Abraão, Ilha Grande, Angra dos Reis, is the subject of the complaint filed with MICI. The IDB has reported that the operation is no longer active, and the executing agency was dissolved following its closure.

The complaint was submitted by four members of a family residing in the community of Vila do Abraão, who claimed that the construction and subsequent suspension of the works had caused social and environmental harm. They alleged environmental and public health impacts, as well as loss of livelihood.

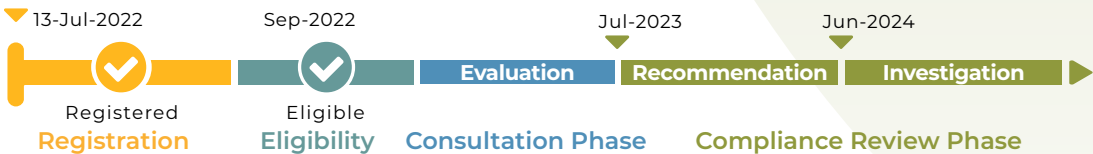
MICI management in 2024

The Board of Executive Directors approved MICI's recommendation to investigate in December 2023 and, in June 2024, the investigation panel was formed, comprising Katty Araya (Coordinator of the Compliance Review Phase), Ione Novoa Jezler (expert in social aspects), and Augusto Mendonça (expert for the environmental component).

Following a deadline extension approved by the Board in December, the Phase continues the desk review, with the preliminary report scheduled to be shared with the parties in February 2025.

Loan Operation: BR-L1210
Environmental Category: B
Sector: Sustainable tourism
IDB Financing: 112,000,000 USD

i More information and public documents:
<https://mici.iadb.org/en/cases/MICI-BID-BR-2022-0189>



Tacuarembó-Salto Green Transmission Line — Request II

Active — Under investigation

The operation is financed by IDB Invest and consists of the design, construction, operation, and maintenance of a 350-kilometer high-voltage transmission line (500 kV), construction of an electrical substation, and delivery of auxiliary services that will interconnect substations in Uruguay's departments of Tacuarembó and Salto. The objective is to ensure the reliability of the country's electrical system and to support the integration of renewable energy.

The request was submitted by two residents and owners of a property located in the Department of Paysandú, who are being represented by two attorneys and an environmental expert in their dealings with MICI. The complaint alleges harm to their property arising from the construction and installation of around 20 metal towers that are 48 meters in height for the transmission line. The complainants contend that the impacts were not properly analyzed and identified, specifically in relation to the protection of historic monuments, and that a comprehensive analysis of alternatives was not conducted and adequate protocols were not implemented to protect sites of cultural significance. They further allege that there were no consultation processes or information made available.

MICI management in 2024

In January 2024, MICI began its investigation with the constitution of the panel, chaired by Kattya Araya, Coordinator of the Phase, and made up of two independent specialists: Alejandra María Valverde Barbosa, an expert in archaeology and cultural heritage, and Natasha Kate Ward, an expert in the implementation of environmental and social policies and cultural heritage.

In April, the investigation panel travelled to Uruguay to visit the project area. During the mission, the team held meetings and interviews with more than 40 people, including the complainants, IDB Invest staff and executing agency officials, national and local authorities, and other stakeholders directly or indirectly involved in the project.

In October, the Phase shared the preliminary investigation report with the parties to gather their comments. After receiving their written input and following a deadline extension, MICI submitted the final Compliance Review Report to the Board of Executive Directors on 2 January 2025, for their consideration.

Loan Operation: 12220-01

Environmental Category: B

Sector: Energy

IDB Invest Financing: 164,068,000 USD

More information and public documents:

<https://mici.iadb.org/en/cases/MICI-CII-UR-2022-0199>



Colombia | MICI-CII-CO-2023-0210 IDB | Invest

Pamplona-Cúcuta Toll-road - Social Bond

Closed: MICI recommended not to investigate

The objective of this project, which is financed by IDB Invest, is the construction, upgrading, repaving, and maintenance of the road between the cities of Pamplona and Cúcuta in the Department of Norte de Santander, crossing the municipios of Pamplonita, Chinácota, Bochalema, and Los Patios.

The complaint was filed by two residents of Cúcuta, who allege potential harm to their finances from the expropriation, without adequate compensation, of a strip of land where they hold a mining concession. The complainants, represented by an attorney in their dealings with MICI, allege a loss of potential earnings and claim that the destruction of infrastructure, limitation of access to the mine, and cost of modifying environmental permits were not considered.

MICI management in 2024

In December 2023, the Consultation Phase concluded that the conditions to initiate a dispute resolution process did not exist and transferred the case to the Compliance Review Phase in early 2024. At that point, MICI began reviewing public and confidential project documents and held meetings with IDB Invest and the complainants to develop a recommendation for a Compliance Review. Based on this analysis, MICI concluded that there was no evidence of noncompliance by IDB Invest Management with the requirements of its Environmental and Social Sustainability Policy, under Performance Standard 1 (Assessment and management of environmental and social risks and impacts) and Performance Standard 5 (Land acquisition and involuntary resettlement).

Following this analysis, in June, the Phase submitted its recommendation not to investigate to the Board of Executive Directors. On 24 July, the Board approved this recommendation, thus bringing the case to an end.

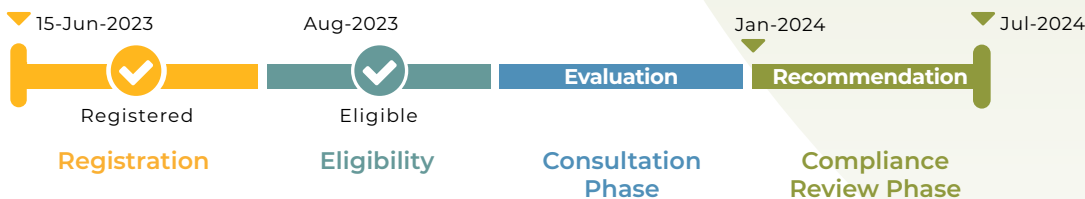
Loan Operation: 14094-01
Environmental Category: A
Sector: Transport
IDB Invest Financing: 175,000,000 USD
More information and public documents:

<https://mici.iadb.org/en/cases/MICI-CII-CO-2023-0210>



Highlights

In its recommendation not to investigate, MICI urged Management to discuss with those responsible for project execution the inclusion of risk management measures more closely aligned with the spirit of IDB Invest's environmental and social policies.



Ecuador | MICI-CII-EC-2023-0218 **Procesadora Nacional de Alimentos, C.A. (“PRONACA”) and La Estancia Investment Holding, S.L. (“La Estancia”)**

Active — Under investigation

This IDB Invest operation involves a loan to Procesadora Nacional de Alimentos C.A. (PRONACA) to finance the company’s 2019/2020 investment plan for organic growth in Ecuador and refinance an existing investment loan, and to provide funds for acquisition of the firm Panavícola I, S.A. (“Toledano”) in Panama. Specifically, the investments in Ecuador would enable PRONACA to increase its installed capacity for chicken and pig production, retrofit its production facilities and increase productivity, and improve its internal policies and corporate efficiency.

The complaint was submitted in September by Tsáchila Indigenous communities in Santo Domingo de los Tsáchilas, Ecuador. These communities allege environmental harm arising from water and air pollution, health impacts, and impacts on their livelihoods that they allege are linked to the project. The complainants are represented for the purposes of the MICI process by the Ecuadorian Coordinator of Organizations for the Defense of Nature and the Environment (CEDENMA) and are being advised by the organizations Friends of the Earth and Bank Information Center.

MICI management in 2024

In January, the Consultation Phase issued its assessment report, concluding that there were no conditions for initiating a dispute resolution process, and transferred the case to the Compliance Review Phase. In April, the Coordinator of the Phase, Katty Araya, recused herself from the case due to a potential appearance of conflict of interest, in accordance with the IDB Group’s Code of Ethics.

From January to August, the Phase reviewed public and confidential project documents and held meetings with IDB Invest and the complainants to develop the recommendation for a Compliance Review. In August, the Board of Executive Directors approved a recommendation to carry out an investigation. Subsequently, in October, the investigation panel was formed, consisting of the MICI director as panel chair and two independent experts: Jay Wagner for the social component and Luis Enrique Sánchez for the environmental aspects. The investigation mission is scheduled for the first weeks of 2025.

Loan Operation: 11598-04

Environmental Category: B

Sector: Agriculture and rural development

IDB Invest Financing: 50,000,000 USD

 More information and public documents:

<https://mici.iadb.org/en/cases/MICI-CII-EC-2023-0218>



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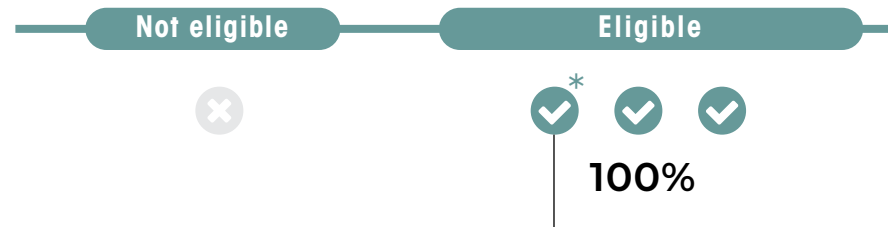
Reviewed complaints

Complaints reviewed in the eligibility stage

In 2024, MICI processed three complaints through the determination of eligibility process: one received in 2023 and two new complaints registered during the year. In this stage, MICI analyzes the allegations presented in the complaint and gathers additional information from both the complainants and those responsible for the project, who can provide their perspectives on the issues raised in the complaint.

All three cases examined met the requirements established in the Mechanism's Policy. After declaring them eligible, MICI transferred them to the Consultation Phase, in accordance with the complainants' preference.

Result of the eligibility process



* Refers to a complaint received in 2023

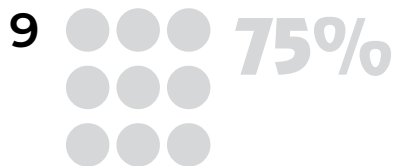
Registration stage

When MICI receives a new complaint, it conducts an initial review within five working days to verify whether it contains the information and meets the criteria for its initial processing established in the MICI Policy (paragraph 14). It also determines whether any of the exclusion criteria outlined in paragraph 19 clearly apply. Of the 12 complaints received in 2024, two met all the requirements and proceeded to the eligibility stage. However, eight did not meet the necessary criteria or were subject to an exclusion, leading MICI to decline their registration and conclude their processing. As of 31 December 2024, two complaints (235 and 236) were still in the registration stage. For comparative purposes, the results of the registration stage that ended on 6 January 2025 are reflected in this table: the first case was not registered, while the second was.

12
Complaints
received in
2024

12 complaints received in 2024

Not registered



Registered



TCP Port Expansion Program

Active — Registration In progress

The project consists of the extension of the land area of the TCP concession by 23 hectares and the expansion and dredging of the wharf area to allow the berthing of vessels of up to 14 meters draft.

On December 5, 2024, MICI received a request from a family of Montevideo, Uruguay.

The request describes a potential harm to the quality of life and economy of the requesters derived from a possible unjustified dismissal of one of its members.

MICI management in 2024

At year-end, the complaint registration process was ongoing.

Loan Operation: 13502-01

Environmental Category: B

Sector: Transport

IDB Invest Financing: 148,860,000 USD

i More information and public documents:

<https://mici.iadb.org/en/cases/MICI-CII-UR-2024-0236>



9

Complaints not registered

One complaint was not registered because it concerned an issue that had already been reviewed in a previous MICI case.

11%
1 Issues already reviewed by MICI

Six complaints were not registered because the complainants had not had any prior contact with the IDB project team, IDB Invest, or IDB Lab. Since the complainants did not express concerns about retaliation, MICI referred them to Management.

67% **6** No prior contact with Management

One complaint lacked sufficient information for its registration, despite the fact that MICI granted an additional 10 business days for the complainant to provide the necessary details.

11% **1** Incomplete information

11%
1 Information request

Finally, a complaint containing only a request for information was not registered.

Reasons why complaints were not registered

Complaints not registered because of **no prior contact with Management**

One of the requirements for registering a complaint is that the applicants must first attempt to address their concerns with IDB Group Management before submitting their complaint to MICI. The only exception to this requirement is if complainants fear potential retaliation for raising their concerns. When this requirement is not met, MICI provides complainants with the necessary information to establish initial contact with the IDB Group project team through the [IDB's Environmental and Social Grievance Protocol](#) or [IDB Invest's Management Grievance Mechanism](#). In addition, complainants are informed that they may return to MICI if they consider that their concerns have not been adequately addressed within a reasonable timeframe.

<u>MICI-BID-HO-2024-0227</u>	Civic Coexistence and Neighborhood Improvement Program (HO-L1187)
<u>MICI-BID-BR-2024-0231</u>	Curitiba's Sustainable Urban Mobility Program — Request III (BR-L1532)
<u>MICI-BID-BR-2024-0232</u>	Curitiba's Sustainable Urban Mobility Program — Request IV (BR-L1532)
<u>MICI-BID-PE-2024-0233</u>	Improvement Huanuco Road, Conococha Huanuco Sector - Huallanca PE - 3N Route Project — Request II (PE-L1151)
<u>MICI-BID-BR-2024-0234</u>	Curitiba's Sustainable Urban Mobility Program — V (BR-L1532)
<u>MICI-BID-UR-2024-0237</u>	Neighborhood Improvement Program III (UR-L1146)

Complaints not registered because **they related to issues already reviewed by MICI**

A complaint was not registered as it referred exclusively to issues that had already been reviewed in past complaints, without presenting new evidence or circumstances (exclusion 19, paragraph c).

<u>MICI-BID-CO-2024-0226</u>	Metro of Bogota First Line - First Tranch — Request XII (CO-L1234)
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Complaints not registered **due to incomplete information**

When a request does not contain all the information required for its registration (paragraph 14), the MICI Policy grants an additional 10 business days for the complainant to supplement the original request. The processing of the complaint concludes if, after that period, the requirements are not met. However, complainants are informed that they may submit a new complaint in the future, ensuring that it includes all the necessary information for consideration.

MICI-BID-BR-2024-0235

Vitória Urban Improvement and Citizen Security Program (BR-L1497)

The registration stage of this complaint was completed on 6 January 2025 and it was not registered.

Information requests

One request was not registered because it was only a request for information or documentation related to an operation financed by the IDB Group. In such cases, MICI refers complainants to the Bank's website to submit a formal [Request for Information](#) and notifies the Access to Information Section accordingly.

MICI-BID-AR-2024-0228

Water and Sanitation Program for Metropolitan Areas — Request IV (AR-L1162)

Annexes

Annex 1: Budget

Approved and Executed Budget for 2024
Figures in US Dollars

Budget Items	IDB	IDB Invest	Total
Salaries	2,592,498	-	2,592,498
Request management	484,352	429,705	914,057
Institution-strengthening	48,500	48,500	97,000
MICI team strengthening	40,000	40,000	80,000
Outreach	116,460	116,460	232,920
Contingency fund	50,000	30,000	80,000
Total approved budget + Contingency fund	3,331,810	664,665	3,996,475

Execution 2024	IDB	IDB Invest	Total
Total executed	2,817,127	616,782	3,433,909
Contingency fund executed	-	-	-
Total executed + Contingency fund	2,817,127	616,782	3,433,909

Annex 2: Outreach in 2024

External outreach

Month	Event	City
January	Launch of the Business and Human Rights Diagnostic	Santiago, Chile
March	IDB and IIC Boards of Governors	Punta Cana, Dominican Republic
April	Specialization course "Safeguards Policies and Grievance Mechanisms in Projects Financed by Multilateral Development Banks"	Virtual
April	MICI meeting with the accountability offices of the Asian Infrastructure Bank (MPP and AIIB CEIU)	Washington, DC, USA
April	Meeting with Civil Society Organizations (CSOs) in Washington	Washington, DC, USA
April	Conference on Human Rights Risks	New York, USA
April	43rd Annual Conference of the International Association for Impact Assessment (IAIA)	Dublin, Ireland
May	Workshop "Accountability and Dispute Resolution: The Role of Civil Society" with organizations from Brazil	São Paulo, Brazil
May	Workshop "Accountability and Dispute Resolution: The Role of Civil Society" with Latin American organizations	Montevideo, Uruguay
June	Exchange of experiences on "Grievance mechanisms: lessons learned, challenges and opportunities"	Virtual
June	Diploma in Negotiation, Mediation and Conflict Prevention Company-State-Communities	Virtual
June	MICI Presentation at the ESG workshop for Bolivian executing agencies	La Paz, Bolivia
July	Dispute resolution mechanisms with companies	Virtual
August	Colloquium "The Environmental Rule of Law: Prospects for the Future"	Washington, DC, USA
September	Fourth edition of the Human Rights and Business Diploma	Virtual
September	Symposium "Environment and Human Rights"	Washington, DC, USA
October	IAMnet Annual Meeting 2024	Manila, Philippines
October	Meeting with civil society organizations with IAMnet	Manila, Philippines
October	MICI presentation at the ESG workshop in Ecuador	Quito, Ecuador
October	IAMnet work session on "Policy reviews and mutual reliance"	Washington, DC, USA
November	IAIA Symposium "Infrastructure and the Environment: Latin America's Path to Sustainability"	Guatemala City, Guatemala
November	MICI Presentation External Panel IDB Information Access Policy	Washington, DC, USA
December	Outreach workshop: IDB Group grievance mechanisms	Virtual
December	Right to complain: grievance mechanisms for internationally funded projects	Virtual

Internal dissemination

Month	Event	City
February	ESG presentation to MICI	Washington, DC, USA
March	Presentation of MICI to IDB management in the Caribbean countries	Washington, DC, USA
April	MICI-ESG exchange meeting: Innovation and Technology	Washington, DC, USA
April	Onboarding seminar for new IDB Group staff	Virtual
May	Knowledge-sharing session with IDB and IDB Invest on Involuntary resettlements	Washington, DC, USA
July	Presentation of MICI to the Climate Change and Sustainable Development Sector	Washington, DC, USA
September	Onboarding seminar for new Executive Directors	Washington, DC, USA
October	Onboarding seminar for new IDB Group staff	Virtual



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