

December 17, 2019

Board of Directors  
Inter-American Development Bank  
1300 New York Avenue, NW  
Washington, D.C. 20577

**RE: Recommendations to strengthen the IDB Invest Sustainability Policy review**

Dear Directors and Counselors,

The purpose of this letter is to express the concerns of the undersigned civil society organizations about the process to review the Environmental and Social Sustainability Policy of the IDB Invest and to urge the Board of Directors to ensure that the new Sustainability Policy is a substantially and comprehensively revised version of the one proposed in Draft 1. Therefore, we urge you to ensure that IDB Invest Management takes civil society inputs seriously.

We believe that the way the IDB Invest consultation has been structured --with one consultation phase and no additional consultations, overlooking the recommendations made in a [letter](#) sent to Management in May, 2019-- inhibits civil society engagement in the process. We cannot effectively engage in a consultation process if there are no genuine and multiple opportunities to dialogue and engage with IDB Invest as the Policy is revised.

Based on widely shared experiences from our previous engagement with IDB Group, IDB Group engagement with civil society and affected communities has been and continues to be worryingly weak compared to other Multilateral Development Banks. The lack of civil society participation in IDBG Annual Meetings represents just one example.

To make the IDB Invest Sustainability Policy review process more accountable and open, we urge you to take into consideration the following recommendations:

- **Ensure that the full set of comments received during the consultation process is published at least one month before the draft is sent to the Board for consideration.**
- **Ensure that the matrix with the comprehensive analysis and response of the comments received is published at least one month before the draft is sent to the Board for consideration.**
- **Only approve a Policy that reflects IDB Invest having meaningfully considered and incorporated (where appropriate) inputs made by civil society, local communities, and indigenous peoples.**

We appreciate your consideration and look forward to working with the Board and IDB Invest Management to improve the safeguards to reflect the best international standards.

Sincerely,

Asociación Ambiente y Sociedad (AAS), Colombia  
Asociación de Desarrollo Sostenible de Poblaciones vulnerables (ADECEP), Peru  
Asociación Interamericana para la Defensa del Ambiente (AIDA), Regional  
Asociación Manuelita y Analy (MAW LSP), Peru  
Asociación Peruana de Abogados con Discapacidad visual, Peru  
Asociación Unión de Talleres 11 de Septiembre, Bolivia  
Bank Information Center (BIC), US  
Center for International Environmental Law (CIEL), US  
Centro de los Derechos del Campesino, Nicaragua  
Centro de Estudios para el Desarrollo Laboral y Agrario (CEDLA), Bolivia  
Centro de Incidencia Ambiental de Panamá (CIAM), Panama  
Centro Mexicano de Derecho Ambiental (CEMDA), Mexico  
China-Latin America Sustainable Investments Initiative (CLASII), International  
Coalición Regional por la Transparencia y Participación, Regional  
Colectivo 21, Peru  
CONNECTAS Direitos Humanos, Brazil  
Derecho, Ambiente, y Recursos Naturales (DAR), Peru  
Federación Nacional de Mujeres con Discapacidad del Peru (FENAMUDIP), Peru  
Fondo Tierra Viva, Honduras  
Fraternidad Cristiana de Personas con Discapacidad (FRATER), Peru  
Fundación Ambiente y Recursos Naturales (FARN), Argentina  
Fundación Cambio Democrático (FCD), Argentina  
Fundación CAUCE, Cultura Ambiental Causa Ecologista, Argentina  
Fundación Humedales, Argentina  
Fundación para el Desarrollo de Políticas Sustentables (FUNDEPS), Argentina  
Gender Action, US  
Instituto de Estudos Socioeconômicos (INESC), Brazil  
International Accountability Project (AIP), International  
Mesa Discapacidad y Derechos de la Coordinadora Nacional de Derechos Humanos, Peru  
ONG Sustentarse, Chile  
Organización Nacional de los Pueblos Indígenas de la Amazonía Colombiana (OPIAC), Colombia  
Otros Mundos Chiapas, Mexico  
Oxfam  
Plataforma Internacional contra la Impunidad, International  
Sociedad y Discapacidad (SODIS), Peru  
Soluciones Integrales Ver SAC, Peru