



Arab Watch Coalition Comments on the Independent Task Force's Draft Report on the Integration of World Bank Group Accountability Mechanisms

Dear Task Force Members,

Thank you for the opportunity to comment on the draft report on the integration of the World Bank Group's Independent Accountability Mechanisms (IAMs). Arab Watch Coalition (AWC) welcomes this reflection process. However, we believe the current process is framed around structural integration, while the most pressing challenges facing accountability run deeper.

1. The issue is not structural — it runs deeper

The Task Force states that "*there is not a crisis in the operations of any of the three IAMs.*" We respectfully disagree. The crisis is not in how the mechanisms function internally; it is in the outcomes they produce for affected communities, and in the institutional environment in which they operate. Significant problems in policy implementation, management responsiveness, and remedy delivery persist across all three mechanisms. These issues should be addressed as a priority before pursuing structural changes. Restructuring the IAMs without addressing them risks consolidating existing weaknesses rather than correcting them.

From our experience, the core challenges stem from:

- **management behavior**, including reluctance to accept findings, delays in response, and weak implementation of remedial actions
- **policy gaps and inconsistencies**, particularly between public and private sector frameworks
- **institutional incentives**, including a strong focus on managing reputational risk

Our region—the Middle East and North Africa—maintains the [lowest](#) per-project ratio of complaints submitted to any of the three mechanisms. This disparity does not suggest that WBG-funded projects are without harm; rather, it reflects a profound lack of community trust in a system where the perceived risks of filing a complaint outweigh the potential for meaningful outcomes. Historically, no complaint submitted to the Inspection Panel from our region has successfully reached the compliance review phase, which we believe stems from undue Board interference. Conversely, while many complaints reached the CAO compliance stage, they rarely resulted in justice for the communities that undertook the lengthy and risky process. Ultimately, Management Action Plans (MAPs) consistently fail to provide adequate remedy for the harms officially acknowledged and verified through investigations

A. Management behavior and institutional culture

The institution's first instinct is still to deny. There is a well-documented pattern across the WBG where the initial response to complaints whether from communities, CSOs, or the IAMs themselves is defensive. A Senior WBG official has acknowledged this candidly in discussions with civil society. **An institutional culture that treats complaints as reputational threats rather than as information about harm will undermine any accountability mechanism, regardless of how it is structured.**

Accountability mechanisms do not deliver remedy in isolation. Their effectiveness depends on how management engages with:

- complaints and affected communities
- compliance findings
- the development and implementation of Management Action Plans (MAPs)

Persistent challenges include:

- delays in MAP implementation
- weak or incomplete remedial actions that do not satisfactorily address the harms
- resistance to compliance findings
- limited use of institutional leverage to ensure client accountability

This institutional posture erodes trust and weakens outcomes. Without meaningful changes in management behavior and incentives, structural reform risks leaving these core issues unaddressed.

B. Policy disparities are a core weakness that must be addressed

The report clearly identifies significant disparities between IAM policies, particularly between public and private sector mechanisms. These differences have real consequences for communities.

Key areas requiring stronger harmonization include:

- eligibility and admissibility criteria
- complainant access and representation
- authority to initiate investigations
- ability to recommend remedies
- monitoring and verification of Management Action Plans

While the principle of “no regression” is important, maintaining weaker provisions risks entrenching existing shortcomings. Integration should be used as an opportunity for **upward harmonization**, ensuring that all mechanisms meet the highest available standards.

At the same time, limitations within the private sector system must be addressed, including:

- significant case backlogs
- extended timelines and missed deadlines
- persistent challenges in developing and implementing robust MAPs

These issues demonstrate that both sides of the system face policy and performance challenges that cannot be resolved through structural redesign alone.

2. Way forward: focus on substance before structure

AWC believes that the priority should be:

- Strengthening policies, including upward harmonization across IAMs
- Ensuring World Bank management is responsible for acting on findings and fixing harm
- Shifting from a risk-averse institutional mentality where the default response is denial toward a culture that treats the identification of harm as an opportunity to address it and in doing so, strengthen the credibility and effectiveness of the institution's own development mission.
- Addressing access barriers, through proactive outreach, disclosure, and simplified complaint processes
- Increasing IAM capacity and budget. As the institution takes on more risk, including in fragile and conflict-affected settings where many of the countries in our region sit, the focus should be on how to equip the accountability system with the needed resources to meet the challenges, not on how to cut its costs.

Only once these issues are addressed should structural reform be considered, and even then, it should be guided by how best to support these core objectives.

Conclusion

The World Bank Group’s accountability system is not failing because of how the mechanisms are structured. It is failing because communities cannot access it, because management resists its findings, because policies create unjustified disparities in who can seek accountability and what remedy is possible, and because the institutional culture treats complaints as threats rather than as essential information. Any integration that does not address these problems will change the architecture without changing the outcomes. **We urge the Task Force to use this**



opportunity not to move pieces around, but to strengthen the substance of accountability for the communities it is meant to serve.

Finally, we recognize the institutional drive to merge IAMs under the "One WBG" initiative. While we welcome our partner organizations' proposed phased merger approach we want to shed light on more core systemic issues.