

**Public Consultation on Draft IFC/MIGA  
Independent Accountability Mechanism (CAO) Policy**

**GLOBAL MEETING  
WASHINGTON DC<sup>1</sup> CONSULTATION**

---

**Virtual Stakeholder Meeting May 10, 2021  
Facilitators' Report**

**I. SUMMARY**

In August 2020, IFC and MIGA Boards of Directors (“Boards”) released the report of the *External Review of IFC’s/MIGA’s Environmental and Social Accountability, including the Compliance Advisor Ombudsman’s (CAO) Role and Effectiveness* (“the External Review”). In response to recommendations from the External Review, the Boards tasked a Joint CAO/IFC/MIGA Working Group (the “Working Group”) to develop a draft IFC/MIGA Independent Accountability Mechanism (CAO) Policy (“CAO Policy”).

The draft policy outlines the CAO’s purpose, mandate and functions, core principles, governance, and operating procedures, and is available for public consultation between April 5 and May 19, 2021. The public consultation phase comprises nine virtual consultations sessions covering all regions of the world. The process also allows for written comments on the draft policy to be shared by email or using an online feedback form available on the dedicated website for the consultation process.

This report summarizes the outcomes of the global consultation session held on May 10, 2021 at 9:00 AM Washington DC time. The session was designed to obtain feedback from community members, civil society, private sector, and representatives of international finance institutions (IFIs), including their respective independent accountability mechanisms (IAMs). Seventy-eight (78) participants attended the meeting.

The session was conducted in English by a team of professional facilitators, with support from note-takers. Members of the CAO/IFC/MIGA Working Group responsible for drafting the policy presented background on the process to date, the key elements of the draft CAO Policy, including enhancements to CAO’s processes, and next steps toward finalizing the policy for approval by the IFC and MIGA Boards in June 2021<sup>2</sup>. Participants were asked to provide their input and questions on the topics they wished to focus on. This report covers the comments and questions from participants and summarizes answers from members of the Working Group. The agenda for the session is attached as Annex I.

**II. STAKEHOLDER FEEDBACK AND QUESTIONS**

Using an anonymous Zoom poll, participants were asked to select the order in which they wished to discuss the different sections of the draft policy: 1) Purpose, Mandate, Functions and Core Principles (including Remedy); 2) Governance; 3) Eligibility of Complaints; 4) Assessment; 5) Dispute

---

<sup>1</sup> The city corresponds to the location where the session would have taken place if it had been held in person rather than virtually.

<sup>2</sup> The presentation can be found and downloaded [here](#). IFC/MIGA also presented on other actions they are developing to [strengthen environmental and social accountability](#) as well as on their work program on [enabling remedial solutions](#).

Resolution; 6) Compliance; 7) Advisory; 8) Threats and Reprisals; 9) Outreach; and 10) Access to Information and Disclosure.

The order of topics prioritized by the participants were:

- Eligibility of Complaints (49%)
- Purpose, Mandate, Functions and Core Principles (including Remedy) (44%)
- Dispute Resolution (44%)
- Compliance (42%)
- Access to Information and Disclosure (38%)
- Assessment (33%)
- Threats and Reprisals (31%)
- Governance (29%)
- Advisory (24%)
- Outreach (20%)

Grouped in three simultaneous breakout rooms, participants provided their input and asked questions on the first four topics. While the focus was on the selected topics, related issues were also raised in the subsequent questions and inputs from stakeholders.

### **Eligibility of Complaints**

**Number of complaints.** A question was asked about how many projects CAO reviews annually and what percentage of IFC projects come before CAO. The Working Group informed that CAO usually gets around 20-30 complaints a year, of which roughly half are eligible. This corresponds to 1-2 percent of IFC's portfolio.

**Eligibility criteria.** A stakeholder suggested that the process of finding a complaint eligible needs to be more objective with strong substantive criteria being met at the outset to avoid the risk of prolonged engagement based on a prejudiced complaint. They observed that CAO's current process of filtering and admitting a complaint appears weak and leads to the presumption that the client is guilty and the complainant a victim, without substantial verification of allegations made against the client.

The Working Group responded that the eligibility phase answers the preliminary question of whether CAO should engage in any further action, as this is a preliminary screening and not an assessment on the merits of the complaint. The Working Group explained that CAO addresses the concerns mentioned by the stakeholder across the subsequent phases of its process and that half of the complaints received are closed at the appraisal stage of the Compliance function.

**Financial Intermediaries.** A stakeholder emphasized that changes regarding the eligibility of complaints pertaining to financial intermediaries (FIs) are important as this is a significant area of concern to many civil society organizations (CSOs) because more than 60% of IFC's portfolio is invested in FIs. They mentioned having already filed 18 complaints on FI projects. The Working Group said that CAO had received 20 complaints related to FIs through fiscal year 2020, out of 207 complaints found eligible since 2000. A stakeholder commented that the low proportion comparative to the size of IFC's FI portfolio is due to the lack of transparency and difficulty in linking sub-projects to an IFC-backed FI.

Stakeholders asked for more clarity about the criteria for eligibility of complaints regarding FI projects and wanted to know more about how to demonstrate a material link between the FI client and its sub-

client. They suggested that there should be a more precise definition of “active sub-clients” of FIs in the policy, which includes sub-clients who are the recipient of advisory and underwriting services from FIs. They specifically inquired if underwriting would be included, i.e., if a client was underwriting a coal mine.

The Working Group informed that there are three criteria in the draft policy about the eligibility of complaints pertaining to FIs. Firstly, the sub-project must be within the scope of the financial product offered to the FI by IFC or guaranteed by MIGA (e.g., if IFC/MIGA is supporting the FI exclusively to support climate-friendly finance, a mine would generally not be within scope). The second criteria, which is the most complicated, is whether there is a material link between the FI client and its active sub-client that is the subject of the complaint. For this, CAO will consider factors such as the nature of financing, the share, type and the tenor or the debt exposure to the sub-project. These factors have been included in a way that is meant to give guidance without being too specific. Thirdly, there needs to be a plausible link to harm or risk of harm related to the sub-project.

The Working Group said that the External Review also made recommendations related to FIs that fell outside of CAO’s policy formulation and are related to clarifying how IFC deals with environmental and social (E&S) requirements of FIs, improvements of both due diligence as well as practices and procedures. IFC is in the process of clarifying the way that they deal with FIs in a separate ongoing process.

Regarding a query about CAO and FI project complaint eligibility, the Working Group explained that the sector involving FIs is currently the third largest one where CAO receives complaints, which usually relate to high-impact business areas, such as mining, infrastructure, and agribusiness. The idea behind including criteria in the policy is to gain more clarity about how CAO handles complaints, particularly which complaints to include and which are not sufficiently linked to the CAO mandate. With regard to the request for clarification about “active sub-clients”, the Working Group informed that the term refers to active financial exposure at the time of the complaint and that the definition does not include non-financial relationships. However, if the view of the stakeholder is that they should be included, the Working Group invited the participant to provide more detail by way of written comments.

A stakeholder asked how complaints in connection with projects financed by intermediaries can be made directly to CAO rather than through the intermediary. The Working Group explained that prior efforts to bring the complaint to the client or IFC/MIGA are not an eligibility requirement. Complainants will be asked if they have raised or would like to raise the complaint directly to IFC/MIGA or the client but they can choose not to do so and proceed directly with a complaint to CAO.

**Post-Exit.** Stakeholders welcome the inclusion of a 15-month window of opportunity to submit complaints after exit. Asked about what “IFC/MIGA exit” means, the Working Group explained it refers to the definition provided in the draft Policy. For IFC, it means with respect to any Project, the termination of the financing, investment, or advisory relationship with the IFC Client for such Project pursuant to the applicable Project agreements. And for MIGA, it means, with respect to any Project, the earlier of (i) expiration of the guarantee period; (ii) termination of MIGA’s contract of guarantee; (iii) cessation of MIGA’s liability under MIGA’s contract of guarantee; (iv) when the Project ceases to exist; or (v) when the Client ceases to have control over the Project.

Regarding a clarification request on what “exceptional circumstances” means, the Working Group pointed to the text of the draft Policy that states: “In exceptional circumstances, CAO may deem eligible a complaint submitted up to 15 months after an IFC/MIGA Exit where: (1) there are compelling reasons why the complaint could not be made before the IFC/MIGA Exit; (2) all of CAO’s other eligibility criteria are met; and (3) after consultation with Management, CAO considers that accepting the complaint would be consistent with CAO’s mandate.” A stakeholder shared concerns with these additional requirements, which seem subjective, would depend on CAO’s discretion, and are not aligned with other independent accountability mechanisms that allow for two years after exit with no limitations.

Stakeholders also raised their concern that leverage with the client would be reduced after IFC/MIGA exit and asked if new clauses could be added in the finance agreements to cover this 15-month period. The Working Group acknowledges that there may be limited leverage after IFC/MIGA exit and said that the situation is not new as some compliance investigations are not completed until after an exit has occurred. The Working Group noted, however, that while the draft Policy does not exclude a discussion of remedy in such circumstances, it may be more difficult to achieve, and a compliance process may still be useful in terms of IFC/MIGA accountability and institutional learning, and that a dispute resolution process between clients and complainants could still be voluntarily pursued if parties are willing to engage.

**Pre-Board approval.** Some stakeholders believe the exclusion of IFC/MIGA projects pending Board approval would be counterproductive and increase the risk of people not finding solutions. In their view, there is a need for an overall change in IFC/MIGA culture to respond to these issues effectively, and until that happens, complainants will be left with no choice but to wait for a project to be approved in order to file a complaint with CAO. A stakeholder also noted that the draft Policy should reflect two recommendations made by the External Review Panel: “CAO should institute a practice of notifying the Board, as well as IFC/MIGA Management, of all complaints received before Board approval and posting them on its registry,” and “CAO should receive a written Management Response to each such complaint.”

The Working Group explained that this change was a recommendation of the External Review, with the goal to improve the culture of response from management.

### **Purpose, Mandate, Functions and Core Principles (including Remedy)**

**Preemptive engagement.** A stakeholder suggested that engagement should be preemptive and not reactive to a complaint and wanted to know how CAO’s role could be modified to bring this about. The Working Group informed that the revised process seeks to encourage early resolution of complaints and proactive engagement by IFC/MIGA and their clients in the process. Still, prior efforts with IFC/MIGA are not a requirement to access CAO. CAO will check with the complainant if they’ve gone to the IFC/MIGA or the client before and if not offer them the option to do so. There is also the possibility through dispute resolution for IFC/MIGA to get involved and work with the client to bring about early resolution. There is also the option later on through the compliance process for CAO to defer the case, provided specific criteria outlined in the draft Policy are met, to allow IFC/MIGA, the client, and complainant to resolve issues directly. Also in the compliance process, IFC/MIGA will be preparing a management response to address CAO’s findings of non-compliance and related harm while doing their client appraisal, and the IFC/MIGA can identify areas where, with the client, they can try and reach resolution with the complainant. The Working Group also noted that the draft Policy includes the possibility for the CAO Director-General (DG), the Boards, or IFC/MIGA management

to trigger a compliance process without an external complaint.

**Access to Remedy.** One stakeholder expressed concerns with the language used to define "access to remedy" in the draft Policy, saying it gives the wrong idea that CAO can provide remedy when all it can do is provide access to mechanisms to address grievances, which is not remedy in itself. In response, the Working Group said that CAO facilitates access to remedy within a broader framework based on the IFC/MIGA Sustainability Policies and Performance Standards and acknowledged the need to re-read the language to clarify that access to a given project-level grievance mechanisms does not equal access to remedy. The Working Group indicated further that the language used tries to embed CAO as a risk management arm of both institutions. Roles have to be clearly defined so there is transparency about what different actors are expected to do. The goal is to highlight how stakeholders can engage in processes that can enable remedy.

Another stakeholder said that, while pleased to see the focus on access to remedy in the Purpose section, the same emphasis on remedy should be included in the section on Management's response and action plans. The stakeholder also asked about CAO's role and the connection or gap between its approach to remedy and national laws. The Working Group explained that CAO is not a judicial body and does not interfere with national legislation.

**Access to Remedy with FIs.** A stakeholder asked how CAO considers access to remedy in terms of FI projects. The Working Group clarified that the dispute resolution function can resolve disputes between the FI sub-clients and complainants. This process can work where the FI sub-clients and the complainant are willing to engage. On the compliance side, when IFC lends to an FI that lends to projects with significant environmental and social risk, the FI is contractually required to incorporate Performance Standards into loan agreements with the project operator. Also, in relation to early engagement there are many other avenues for communities like project-level grievance mechanisms which are a part of the ecosystem of accountability.

### **Dispute Resolution**

**IFC/MIGA engagement.** In relation to the language used in the draft Policy around IFC/MIGA participation in a CAO dispute resolution (DR) process, a stakeholder asked if the Working Group can provide clarifications on IFC's willingness to participate; what the conditions for this are; whether the process would move forward if the client does not want a DR process; and how IFC's participation can incentivize clients to engage in DR. The Working Group explained that the objective and intention is to facilitate the early resolution of complaints, so if clients and complainants are inviting IFC or MIGA, the expectation is that IFC or MIGA should participate in DR processes unless exceptions apply.

Another stakeholder welcomed IFC/MIGA engagement in the DR process as it is instrumental in addressing the grievance and helping supervise the client's response. It would also serve as a way to shift the power imbalance between clients and complainants. Still, in this stakeholder's view, if requested by complainants, IFC/MIGA engagement should be a given and not just an option.

**Worker strikes.** A stakeholder enquired if when workers are on strike for better salaries, whether CAO can play a role. The Working Group mentioned that there have been a number of such cases. From a compliance perspective, the questions that would be asked are if the salaries and working conditions comply with national laws/collective bargaining agreements and whether IFC/MIGA has assured itself of this. If the complainant alleges that the client is not paying what is required under national law or a collective bargaining agreement, this is a question for compliance to address. Often, when workers are on strike and losing wages because of a no-work-no-pay policy, local remedies may

be quicker, through local bargaining councils or other provisions. Local recourse measures can respond more quickly. But if the complaint is filed with CAO and it is found eligible, the DR function could complement any bargaining process that has been agreed to. If there is no process in place and the client is willing to engage, CAO could use their mediation process to help parties reach agreement. CAO would not want to start a process in competition with what is already on the ground. Complaints which are not systemic but relate to individual employment contracts with claims for payments and benefits would be excluded from eligibility. The draft Policy states that CAO will refer this kind of ineligible employment contract-related complaint to IFC and MIGA.

**Complainants' explicit consent for the transfer to Compliance.** A participant indicated that the choice of language is not in good harmony with the zero-tolerance approach regarding threats and reprisals and does not clarify the conditions to waive the requirement to consent to move to Compliance. The Working Group informed that there is specific language in the draft Policy that recognizes that consent can be waived in case of threats and reprisals. The Working Group also shared the concern voiced by participants that strengthening the complainants' agency by requiring their explicit consent should not result in putting them at risk.

**Dispute Resolution and Compliance.** A question was asked if there is scope for complaints to go to the Compliance function, even after being successfully resolved at the DR stage, so IFC's/MIGA's role in potentially breaching its own environmental and social standards can also be investigated.

The Working Group informed that under the current CAO Operational Guidelines and draft Policy, there is no prohibition on having a compliance process after completion of DR. Additionally, the option of the CAO DG to initiate a compliance appraisal has been retained and enhanced in the draft Policy. So, if complainants wanted full resolution through DR but still want a compliance process, that issue could be brought to the attention of the DG.

## **Compliance**

**Purpose of Compliance.** A stakeholder expressed concern that the language used to present the purpose of the compliance process could lead to "immobilization" of CAO. Specifically, the statement that "CAO cannot make findings in relation to compliance of a Project, Subproject, Client or sub-client with the Performance Standards" used under the Compliance Section A can be understood to mean that CAO will not assess the client's actions, while CAO needs to look at the client's actions. To this end, the language of the current Operational Guidelines is more explicit. In response, the Working Group explained that the idea behind this was to focus rather than restrict the compliance process. Further, it was indicated that the intention is highlighted in the compliance investigation process, which states that CAO must also look at project E&S performance to look at IFC/MIGA compliance with its E&S policies.

**Client compliance.** A stakeholder suggested that the policy is not going far enough and has missed the opportunity to expand CAO's mandate to review client compliance and not just IFC's/MIGA's compliance. In this stakeholder's view, if CAO had an explicit mandate to examine client compliance, it could have a strong deterrent effect on risky and harmful actions, becoming a game changer for accountability. The stakeholder believes it is a missed opportunity of the draft Policy and regrets that that CAO's assessment of the ground level impacts has to be read between the lines.

The Working Group explained it is not possible to have a compliance report that does not look at what happens at the project level. The draft Policy provides for the Compliance function to assess what is happening at the project level in order to make meaningful recommendations, even though the findings

are focused on IFC/MIGA, and on the issue of harm. The Working Group also pointed to the following text from draft Policy: “A compliance investigation does not make non-compliance findings in relation to a Project or Sub-Project. However, in making findings regarding Harm and whether any Harm is related to IFC/MIGA non-compliance with its Environmental & Social (E&S) Policies, CAO will assess IFC/MIGA’s review and supervision of its E&S Requirements at the Project or Sub-Project level and consider Project or Sub-Project-level environmental and social performance.”

**Timeframes and risks.** A participant shared a situation where the IFC divested before the investigation was completed. Complainants felt that CAO did not prove useful and put their lives at risk because many of them were beaten, deaths occurred, and that IFC washed their hands of this. The Working Group responded that clear deadlines and commitments to timeframes are now included in the draft Policy to help CAO focus its work and get the resources necessary to run the processes in a timely manner, and so that complainants know when to expect what. With regard to exit, the Working Group indicated that IFC/MIGA are aware that exit can exacerbate problems and, in response to specific recommendations in the External Review and related to the workstream on enabling remedial solutions, they are working on principles to guide responsible exit. For enabling remedial solutions, IFC/MIGA are currently in the research phase, and based on the research, will produce an issues and options paper for discussion later this year.

**Judicial proceedings.** A stakeholder asked how the presence of concurrent judicial proceedings could inform the content of the Terms of Reference (TORs) for the compliance investigation. The Working Group responded that each case is distinct so the assessment will be done on a case-by-case basis, depending on how the judicial proceeding overlaps with the compliance process. Still, there is a need to develop a number of pieces that will provide guidance to support implementation. The Working Group also pointed to the following text in the draft Policy: “Where relevant in accordance with applicable IFC/MIGA E&S Requirements that refer to national law, CAO will also consider how IFC/MIGA reviewed and supervised the Project’s compliance with applicable national law.”

**Assessing threats and reprisals.** A stakeholder asked for more clarity on how CAO assesses whether or not complainants are being pressured to provide consent for the complaint to be transferred to the Compliance function. The Working Group informed that, typically, concerns about threats are often raised as early as at the beginning of the eligibility phase. The draft Policy requires CAO to work with the complainants expressing concerns to help prevent reprisals and, where possible, work to create a safe environment to raise and discuss concerns about a project. There may be situations where communities are fearful even to say that they are afraid. CAO will need to work with civil society partners and other stakeholders to ensure that they can detect this and be careful not to put people at further risk, even where communities cannot give them a clear indication. CAO has an approach in place that helps to implement these commitments in practice.

**Identification of Harm.** A stakeholder expressed that sometimes the complainant only wants an apology and asked regarding clarification of harm if there are any adjustments regarding apologies in the event of harm, based on cultural contexts and any implementation guidelines regarding this. The Working Group responded that an apology can sometimes play an important part in DR processes and is a part of the range of actions that contribute toward remedy, which is elaborated jointly by the parties in dialogue.

**Performance Standards.** A stakeholder asked what steps CAO will take if it finds that IFC in their review and monitoring process did not follow the requirements of the Performance Standards. Another stakeholder asked if the Management Action Plan (MAP) would address every issue of non-compliance that CAO finds. The Working Group responded to the first question informing that CAO

would provide recommendations to address non-compliance and associated harm. IFC/MIGA and the client would then put together a response and prepare a MAP. The effective implementation of the MAP would be monitored by CAO with IFC/MIGA providing periodic progress reports. The answer to the second question was that IFC/MIGA would be required to submit a report stating the actions proposed in response to CAO's findings for Board consideration, including a reasoned response to those regarding non-compliance or related harm that IFC/MIGA is unable to address in the MAP.

**Auditor's expertise.** A stakeholder expressed concern about situations where non-compliance issues raised by the 'auditor' are wrong and wanted to know what CAO would do in cases where the 'auditor' lacks knowledge in the specific sector. The Working Group informed that CAO makes efforts to engage sector specialists with regional expertise. Additionally, there is a process to eliminate errors before the report becomes final. The factual review and comment stage, strengthened with complainant and management input as well as the opportunity for the client to review the report, should allow errors to be brought to CAO's attention so that they can be addressed. Management has the option to disagree with findings and if this were to happen, it is for the Board to determine if that is a sufficient response or if anything else is required.

**Associated Facilities.** A question was asked as to whether compliance covers associated facilities where government has not fully executed their responsibilities and if so to what extent. The Working Group clarified that associated facilities are within CAO's mandate as they are within the definition of project impacts as set out in the Performance Standards and complaints about associated facilities, whether run by government or private sector, can be accepted by CAO. The extent to which associated facilities can be dealt with is clearly addressed in Performance Standards 1 to 8.

**Role of the Board, including review of a decision to investigate.** A stakeholder asked what the role of the Board would be in reviewing CAO decisions to initiate a compliance investigation and what criteria would govern the exercise of this role under the draft policy. Another stakeholder asked for clarity about the problem intended to be solved with this diversion from the current practice where CAO is the sole decision-maker. Some participants believe that a Board review of CAO's decision to investigate will make the process more political, it will harm CAO's independence, and may lead to a decrease in complaints to CAO. Participants illustrated this by noting that most investors in India, the Middle East and the North Africa region have access to the political elite. Fear of elites' influence over IFC/MIGA Boards will likely deter complainants from submitting complaints.

The Working Group informed that this is a new aspect to the draft Policy that is intended to balance CAO's independence with Board oversight. The External Review recommended that CAO should retain the decision to investigate, but the draft Policy includes a new step: the option for IFC/MIGA management to request a Board review of the decision to investigate. The draft Policy provides that Boards will review the decision to investigate based on established technical criteria "without making a judgment on the merits of the complaint and will not discuss matters that require the exercise of discretion by the CAO DG under this Policy." The draft Policy envisages that Board reviews are not expected to become the norm. The proposed process is designed to be transparent and time-bound, and should not lead to a long delays.

**Factual Review.** A stakeholder asked what can be observed or disputed in "factual review", whether it is possible to question findings and make recommendations, and if parties' comments will be made public. The Working Group responded that the purpose of a factual review is to verify that all relevant facts are known and addressed in the process and the report, and that the opportunity to provide comments is not meant for parties to provide statements on findings or make recommendations on substantive results.



---

## **General feedback and additional comments**

**Process.** A stakeholder asked if the policy will be made public before going to the Board for final approval and how stakeholders will know how their comments have been taken into consideration. The Working Group responded that, given time constraints, the draft Policy will not be available for a second round of consultations before it is submitted to the Board for approval, but the Working Group will issue a summary report to reflect how comments made in the consultation process were addressed.

**Harmonization and Leadership.** A participant expressed hope that when complainants file complaints with different accountability mechanisms, CAO will take a leading role as it will likely be the best IAM and a leader to follow once the new policy is approved. In the participant's view, CAO is well versed and far ahead in the area of remedy and remedial action. Complainants have not felt fully satisfied when CAO has not taken the lead. The Working Group responded that CAO must always deliver fully on its mandate to respond to complaints about IFC/MIGA-supported projects within the framework of IFC/MIGA requirements, which is often slightly but importantly different framing of the mandates of the different accountability mechanisms. This presents a challenge, but effective coordination should help achieve an efficient response when working on co-financed projects. The Working Group also reminded that complainants' and the communities' rights of choice should drive how this is done. They should be able to state what they are looking for and what they deem the most appropriate ways for IAMs to work together, but also distinctly and apart.

## **III. NEXT STEPS**

The representatives of the Working Group closed the meeting reflecting on the issues raised and thanking participants for their contributions. In terms of next steps, the Working Group will carefully consider written and verbal feedback received during the consultation period as they finalize the draft CAO policy for consideration and approval by the IFC and MIGA Boards in June 2021. In addition to a summary report from each regional and global consultation meeting, a consolidated consultation report that summarizes feedback received during the public consultation period and indicates how feedback was addressed in the final CAO policy will be released.

## ANNEX I: AGENDA

### Agenda for Public Consultation Meetings on Draft IFC/MIGA Independent Accountability Mechanism (CAO) Policy

---

Washington, D.C., May 10, 2021 – 9:00 AM (EST time)

TIME	TOPIC
35 MINUTES	<ul style="list-style-type: none"><li>- Welcome, background and purpose of the meeting</li><li>- Overview of cycle to complete draft CAO Policy, including regional sessions held so far.</li><li>- Key changes to CAO processes brought about by the draft CAO Policy.</li><li>- Update on other actions IFC and MIGA are developing to strengthen environmental and social accountability and IFC and MIGA's work program on enabling remedial solutions.</li></ul>
110 MINUTES	Questions and comments from participants on the draft CAO Policy (Break-out groups and Plenary Session)
5 MINUTES	Closing remarks and next steps