ADB's Accountability Mechanism (AM) provides a forum where people adversely affected by ADB-assisted projects can voice and seek solutions to their problems and report alleged noncompliance with ADB’s operational policies and procedures. It consists of two separate but complementary functions: problem-solving function and compliance review function. The AM’s objective is to be accountable to people for ADB-assisted projects as a last resort mechanism.

1 https://www.adb.org/projects/43281-013/main#project-pds

Accountability Mechanism
Website
Complaint Receiving Officer Registry
OCRP Complaints Registry
OSPF Complaints Registry

AM Links

Volume 1, Issue No. 16, December 2018

Office of the Special Project Facilitator (OSPF) — Problem-Solving Function

UPDATES ON NEW COMPLAINTS

Nepal: Tanahu Hydropower Project

The Office of the Special Project Facilitator (OSPF) fielded a joint fact-finding mission, together with South Asia Department (SARD), to Kathmandu and Pokhara, Nepal, from 1-5 October 2018 to meet with the executing agency, Tanahu Hydropower Limited (THL), and the Complainants to better understand the complaint, determine its eligibility, and facilitate problem-solving, if required.

The project will develop a 140-megawatt hydropower plant to be located on the Seti River in Tanahu district. It will build a medium-sized plant with water storage and transmission system and provide rural electrification and community development in the area. It also has a reform and restructuring plan for the Nepal Electricity Authority. The project is categorized A for both environmental and social aspects.¹

The complaint received from a group of affected households belonging to the Magar Indigenous Peoples alleged that the project will cause direct and material harm due to inundation and that consultation and participation were inadequate which led to unfair compensation. The mission, in separate meetings, held discussions with the Complainants and THL. A course of action was agreed to be implemented by SARD, THL, and the Complainants. On 9 October 2018, the Special Project Facilitator (SPF) deemed the complaint ineligible for the problem-solving process as the Complainants had not attempted to work with SARD prior to reaching out to ADB’s Accountability Mechanism (AM) and it was noted that SARD and THL demonstrated strong commitment towards complaint resolution. The OSPF is closely monitoring the implementation of the course of action.

¹ https://www.adb.org/projects/43281-013/main#project-pds
Office of the Special Project Facilitator (OSPF) — Problem-Solving Function

UPDATE ON NEW COMPLAINTS (continuation)

Georgia: Batumi Bypass Road Project

The project will construct a new two-lane bypass road of 16.2 km skirting Batumi and contract out routine and periodic maintenance work for about 200 km of international roads combined with connecting secondary roads based on performance-based maintenance contract.

The Complainant alleges loss of business and inadequate compensation of land and property acquired for the project due to incorrect appraisal by a valuation agency engaged by the project. After an initial assessment and separate discussions with the Central and West Asia Department team and the Complainants, the SPF deemed the complaint eligible on 9 October 2018 as there are indications of systemic issues in the valuation of properties in the project.

The OSPF conducted an independent review and assessment of the complaint, including dialogue with the Roads Department and the Complainants from 16-17 October 2018 in Tbilisi and Batumi, Georgia. Subsequent to the mission, an OSPF consultant conducted an assessment of purchases of several land plots that are comparable to the Complainant’s plot. The assessment confirmed that there are similar nearby plots that have recently been sold for substantially higher values. Based on this, it appears that the valuation upon which the compensation was based was flawed and the compensation on the low side. On the basis of the field review and consultant assessment, the SPF recommended that the Roads Department reopen the case. A decision in this regard is pending.

OTHER COMPLAINTS AT A GLANCE

- **Mongolia: Ulaanbaatar Services and Ger Areas Development Investment Program – Tranche 1**
  - By working closely with the Complainants and Municipality of Ulaanbaatar, the ADB project team and OSPF facilitated negotiated settlements with all the Complainants but for four Complainants who refused to sell their land because of land legacy and/or demands for compensation packages that were much higher than agreed in the memorandum of understanding. An implementation and monitoring plan was agreed on 12 November 2018. OSPF will continue to be engaged primarily in a monitoring role but will facilitate further negotiations as needed. The Problem-Solving Report has been finalized and will be published on the OSPF website in January 2019.

- **Pakistan: National Highway Network Development in Balochistan Project**
  - The problem-solving process for the complaint has been overtaken by legal proceedings regarding the case. The High Court of Balochistan has issued its decision instructing the National Highway Authority (NHA) to assess the land belonging to the land owners in the N-70 road to be compensated in accordance with the Land Acquisition Act of 1894. SPF has sought information on expected actions by NHA in response to the court order. A formal NHA position has not been received. Next actions are dependent on the NHA position.

- **Sri Lanka: Clean Energy and Network Efficiency Improvement Project**
  - Supreme court hearing which was scheduled on 5 December 2018 was postponed to March 2019. No further actions are anticipated until the Supreme Court has ruled on the case.

- **Loans 3520 and 8328**
  - Approval Date: 28 March 2017
  - Complaint Received: 2 October 2018
  - Status: Eligible

- **Loans 3009/3009 and Grant (038)**
  - Approval Date: 17 December 2013
  - Complaint Received: 28 March 2018
  - Status: Eligible

- **Loans 3134 and Grant 0461**
  - Approval Date: 27 June 2014
  - Complaint Received: 8 April 2018
  - Status: Eligible

- **Loans 2892/2893, Grant 0303, and TA 8107**
  - Approval Date: 18 September 2012
  - Complaint Received: 16 August 2017
  - Status: Eligible
Office of the Special Project Facilitator (OSPF) — Problem-Solving Function

OPERATIONAL SUPPORT AND ADVISORY SERVICES

Capacity Building on Grievance Redress Mechanisms and Problem-Solving Tools for ADB-assisted Projects in Indonesia

A training program was conducted in Jakarta, Indonesia, from 28-30 November 2018 with a total of 30 participants across 13 executing and implementing agencies, including ADB resident mission staff. William Kennedy, Director of the Office of Accountability, Overseas Private Investment Corporation (OPIC), joined the workshop and presented an overview of the Independent Accountability Mechanisms including OPIC's mandate in complaint handling which is similar to the ADB's AM. The training focused on the critical elements of grievance redress mechanisms (GRM) and the problem-solving tool, using the RESOLVE² approach, walking participants through each step using a case study. The training also raised the importance of collaborative and group decision-making for resolving issues.

Indonesia Resident Mission Country Director expressed his keen interest and support for the training as Indonesia’s lending portfolio has increased, requiring more support on GRM and problem-solving. The workshops were rated positive by the participants on its content, pedagogy, and the technical know-how of the facilitators. This was the first training for them with regard to GRMs and problem-solving and they expressed that this training should be conducted periodically across sectors and regions. This completes the 10 trainings OSPF conducted in 2018 across the region.

KNOWLEDGE SUPPORT TECHNICAL ASSISTANCE: Capacity Building for Grievance Redress and Dispute Resolution During Project Implementation

The midterm review of Strategy 2020 and the new Strategy 2030 of the ADB recognize the need for and give priority to more effective and efficient implementation of ADB-supported projects. One of ADB's key objectives is to improve its standards in member countries by strengthening the capacity of executing and implementing agencies to plan, design, finance, and implement ADB-supported development projects. Approved in September 2018, the knowledge and support technical assistance (TA) will increase the efficiency and effectiveness of development projects, as well as their overall sustainability. It will achieve this by reducing the risk of complaints to ADB's AM, thereby avoiding costs and delays in project implementation.

The TA will improve the understanding and application of GRMs and the problem-solving performance of executing and implementing agencies and other key stakeholders, such as civil society organizations. This will be accomplished through a capacity development and training program targeting sector portfolios with high safeguards risk. It will be enhanced by analytical research and the establishment of a network of practitioners on GRM and problem-solving or dispute resolution experiences in member countries. The OSPF will ensure close collaboration on this TA with the Sustainable Development and Climate Change Department and the Office of the Compliance Review Panel.

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² RESOLVE stands for Review and Expound, Solicit, Observe, analyze options, improve, and Evaluate.
Office of the Compliance Review Panel (OCRP) — Compliance Review Function

COMPLIANCE REVIEW

GEO: Sustainable Urban Transport Investment Program - Tranche 3 (Loan No. 3063)- Complaint 4

A fourth request for compliance review was received by the Compliance Review Panel (CRP) on 11 October 2018 for the above Project from 18 complainants of Marneuli street, Rustavi Highway, Tbilisi, Georgia. Having confirmed that the complaint is within the mandate of the compliance review function, Management was requested be the CRP a response by 19 November 2018.

Taking advantage of the presence of all the CRP members in ADB Headquarters, the CRP met with the Central and West Asia Department (CWRD) on 19 October 2018, partly on this complaint. While the complainants’ identities were not disclosed by the CRP to CWRD, as requested by the complainants, the CWRD project team knows the complainants as they have been closely collaborating with the Municipal Development Fund of Georgia (MDF), which is the implementing agency for the Project, on resolving the complaint. The CWRD project team is also very much aware of the situation on the ground and the complainants’ issue and has also been provided relevant documents on the case by the MDF.

During the meeting and in the Management’s response, CWRD described its efforts at addressing the complainants’ issues which led the CRP to consider this fourth complaint ineligible for compliance review because the complainants and ADB Management have agreed to continue good faith efforts to resolve the issues raised in the complaint. In its eligibility report which was submitted to the ADB Board of Directors on 17 December 2018, the CRP strongly encouraged CWRD to continue constructive and consultative engagement with the complainants, through the borrower, and suggested that ADB Management update the CRP on a quarterly basis, or more frequently if appropriate, until issues raised by the complainants have been resolved.

IND: South Asia Subregional Economic Cooperation Road Connectivity Investment Program - Tranche 2

Two individuals from Sibong Khudengthabi Village, Moreh, Tengnoupal District, Manipur, India complained about Asian Development Bank’s (ADB) noncompliance with its operational policies and procedures while implementing the above project. The complaint, which was forwarded to the CRP on 22 October 2018, delves on the issue of resettlement compensation.

Per CRP’s initial analysis, the complaint falls within the mandate of the compliance review function and thus a Management’s response was requested. However, midway during eligibility determination, the complainants emailed the CRP on 24 November 2018 informing that they are collectively withdrawing their complaint from the compliance review function of ADB’s Accountability Mechanism. As such, in accordance with paragraph 153 of the Accountability Mechanism Policy, the CRP terminated further processing said complaint due to complainants’ withdrawal.

While the complaint processing under the compliance review function ended, the CRP encouraged Management to continue working with the complainants and other people to be affected by the Project. This is also in line with strengthening the compliance review and problem-solving functions inherent among operations departments which is more effective in addressing complainant’s concerns. Consistent with para. 196 of the Accountability Mechanism Policy and to regularly inform the Board Compliance Review Committee, the South Asia Department (SARD) was also requested to update the CRP quarterly on developments regarding the complaint prior to submission of a completion report on good faith efforts by SARD with the complainants.
Office of the Compliance Review Panel (OCRP) — Compliance Review Function

MONITORING OF IMPLEMENTATION OF BOARD DECISIONS

GEO: Sustainable Urban Transport Investment Program - Tranche 3 (Loan No. 3063)

The CRP’s first annual monitoring report for this Project was issued on 6 September 2018. Since then, CWRD and CRP-OCRP have been occasionally contacting each other on matters relating to the implementation of the remedial actions.

On 5 November, the CRP received a memo from CWRD transmitting MDF’s responses to the CRP’s comments on the Site-Specific Environmental Management Plan of Tbilisi-Rustavi Urban Road Link (Section 2). The document also provided some updates on actions in the field relating to the project and implementation of the action plan and active collaboration between CWRD and MDF on such.

After the CRP’s issuance of its first annual monitoring report on the implementation of the Remedial Action Plan (RAP) including the RAP Final Solution for this project, the CRP has already received two emails from one of the complainants. The emails, one received by the CRP on 12 October 2018 with two short video clips of meetings with MDF personnel and the other, on 14 November, were about respecting the citizen’s right to life and property and strongly appealing to authorities on the subject. Both emails were forwarded by OCRP to CWRD for appropriate action with copy to BCRC Chair.

CAM: Greater Mekong Sub-Region Rehabilitation of the Railway in Cambodia Project

With the complaint on the Project filed and investigated following the Accountability Mechanism Policy of 2003, the Project is now in the fourth year of CRP monitoring of the implementation of Board-approved CRP recommendations. The CRP planned to conduct a monitoring mission prior to October 2018; visit resettlement sites; and talk to affected persons, as well as meet with the government. However, due to national elections in Cambodia, this did not prove possible, and the CRP decided not to further delay the submission of its fourth annual monitoring report to the Board. ADB Management submitted its 13th progress report on the implementation of Management’s action plan to implement the Board decision on the CRP’s recommendations on the Project which was received by the CRP on 18 October 2018. This is the only formal progress report from ADB Management since December 2017. The CRP met with concerned ADB staff at ADB Headquarters on 19 October 2018 and with staff at the ADB Cambodia Resident Mission. As the loans for the Project had already been closed since 01 November 2016, all the actions to address the Board-approved recommendations are done through TA 8810: Strengthening Resettlement and Income Restoration Implementation which is implemented by SETC. Thus, the CRP also met with SETC consultants implementing TA 8810 to assess the progress of the implementation of the Board-approved recommendations. While there has been significant progress in the implementation of Board-approved recommendations, not all have been fully complied with at this point.
MONITORING OF IMPLEMENTATION OF BOARD DECISIONS (continuation)

IND: Mundra Ultra Mega Power Project (Loan No. 2419)

In the 13th quarterly progress report on the implementation of remedial actions covering the period from 25 June to 24 September 2018 on the Project which was received by the CRP on 6 November 2018 from the Private Sector Operations Department (PSOD), it was stated that the borrower, Coastal Gujarat Power Limited (CGPL) had prepaid in full its loan to ADB for this Project on 28 September 2018. Since it has been only a few months after the CRP’s last site visit and the end of coverage of the update, there has not been significant progress in the implementation of the remedial actions. What seems to be notable is the engagement by CGPL of SWADEEP, a local NGO, to consult with pagadiyas on a feasible livelihood option as the establishment of a shrimp farm has long been delayed as initially planned. Also, the report mentioned that the ADB Management (PSOD) has been trying to push CGPL Management to restore the community services (e.g., supply of potable water, periodic health camps) to Tragadi bandler that it had previously provided the transient fisherfolk there prior to August 2017. As a result, as of September 2018, CGPL has also engaged SWADEEP as partner in the implementation of CGPL’s interventions on education, micro-finance, maintenance works of access road and roads within Tragadi bandler as part of its corporate social responsibility program; organized consultations with Tragadi panchayat and Tragadi bandler residents, based on which restoration of the water supply by CGPL to Tragadi bandler has been agreed.

OCRP ACTIVITIES

In-reach

On 9 November 2018, Josefina Miranda, Senior Compliance Review Officer, OCRP, briefed about 50 new ADB staff on the Accountability Mechanism during the quarterly Induction program for new ADB staff.

Outreach

For the period, OCRP conducted outreach missions detailed below.

i) Dili, Timor Leste on 17 September, with around 30 government representatives, ADB staffs participated, and about 22 NGOs/CSOs representatives, consultants working on ADB assisted projects including staff from Japan International Cooperation Agency (JICA) and International Labor Organization (ILO) attending;

ii) Honiara, Solomon Islands on 20 September, for 24 people from government, NGOs/CSOs, contractors/consultants and ADB staffs;

iii) Phnom Pehn, Cambodia on 23 October for more than 25 CARM staff;

iv) New York (USA) for NGOs on 8 November, in cooperation with US Environmental Defense Fund;

v) Ottawa (CAN) outreach on 9 November for government officials; and

vi) workshop at Johns Hopkins University (USA) on 16 November for academic people and students.
Office of the Compliance Review Panel (OCRP) — Compliance Review Function

OCRP ACTIVITIES (continuation)

The CRP Chair with OSPF also attended the 15th annual meeting of the Independent Accountability Mechanisms (IAMs) of IFIs from 12-15 November 2018 at the World Bank in Washington, D.C. This event, which was attended by more than 20 IFIs and MDBs enabled IAMs to share experiences and challenges on the implementation of IAMs; and discuss collaboration (on joint complaints resolution or investigation or through small groups on specific topics that cut across IAM members) among network members.

Technical Assistance on Strengthening Policy Compliance Awareness for Good Governance and Development Effectiveness (TA 9289). Through this TA, a sourcebook on the compliance review of the Accountability Mechanism primarily geared towards improving ADB staff’s understanding of the compliance review processes is being developed by OCRP with its NGO consultant ASSIST. The draft Sourcebook is currently being reviewed and is expected to be published online by second quarter of 2019.

TA 9466: Strengthening Compliance Review and Accountability to Project Affected Persons of Financial Intermediaries, Financed by the PRC: Regional Cooperation and Poverty Reduction Fund (PRCF). The third regional workshop for this TA was held in New Delhi from 31 October to 1 November 2018. The workshop mobilized the participation of around 55 senior and working level staff from government agencies; financial intermediaries; and banks from New Delhi; governments and private sector representatives from South Asian countries; ADB staff; and participants from other MDBs and international NGOs. Through presentations and break-out sessions, the knowledge sharing event (i) promoted accountability and management of environmental and social risks among various financial institutions; and (ii) provided international good practices that would help in the establishment of complaint mechanism for compliance review and accountability within the participating institutions. The presentations during the workshop and highlights of discussions fed into the compilation of good practices for Strengthening Safeguard Compliance and Accountability of Financial Intermediaries (FIs) to Project-Affected Persons which a knowledge product that will be prepared under this TA.

CRP Chair, Dingding Tang with Additional Secretary (Fund Bank and ADB), Government of India, Sameer Kumar Khare and the ADB’s Country Director India Resident Mission, Kenichi Yokoyama.
Processing of new TA on Developing an Accountability Mechanism Framework for Financial Intermediaries proposed to be financed by PRCF. To further support financial inclusion and strengthen the capacity and standards of developing member countries (DMCs) and partner financial institutions of ADB as articulated in Strategy 2030, the KSTA will focus on developing an Accountability Mechanism Framework (AMF) for financial intermediaries (FIs). This draft AMF can then be fine-tuned by several FIs funded either under their own projects or those funded by ADB. The AMF is expected not only to improve safeguards compliance and accountability with the end view of enhancing the development effectiveness of ADB-assisted projects, especially those funded through FIs. This draft TA paper has gone through interdepartmental review and awaiting approval of funding by PRCF.

JOINT AM OUTREACH

ADB’s Accountability Mechanism Briefing, New York City, 8 November 2018

Dingding Tang and Warren Evans, in cooperation with US Environmental Defense Fund, conducted on 8 November the Green Finance Workshop in New York: How to enhance financial intermediaries’ environmental and social compliance, supervision, and accountability in Asia and the Pacific Workshop. About 20 participants from International Finance Corporation, United Nations Development Programme (UNDP), US and PRC banks, and civil society and nongovernment organizations (CSOs/NGOs), such as the Bank Information Center, Accountability Counsel, and the Friends of the Earth, attended the workshop. Participants recognized challenges relating to emerging social and environmental risks caused by financial intermediaries (FI) investment activities in Asia and the Pacific region, and appreciate efforts made by the AM on such. Participant CSOs/NGOs expressed their strong interests to participate in said new technical assistance activity and look forward to working together with the AM to enhance the capacity of FIs in the field of safeguard compliance and the accountability.

After the workshop, Dingding Tang visited UNDP headquarters and met with UN Assistant Secretary-General and concurrently Assistant Administrator of UNDP, Haoliang Xu. He introduced ADB’s practice on safeguard compliance and the accountability, and also discussed potential cooperation between UNDP’s Compliance Unit and the AM, in particular with the Compliance Review Panel, in the future.

Seminar at Global Affairs Canada, Ottawa, 9 November 2018

Dingding Tang, Warren Evans, and Bart Edes participated in a meeting with representatives of Global Affairs Canada and the Ministry of Finance in Ottawa on 9 November 2018. The presentation focused on providing the background of the ADB’s AM Policy—how it works, what are the recent trends, and comparing the ADB’s approach to compliance review and problem-solving with other multilateral development banks. The Office of the Compliance Review Panel and the OSPF will follow-up with Canadian counterparts to further explore possible collaboration.

Inter-American Development Bank Accountability Reflections Program, Washington, D.C., 12 November 2018

The Annual Meeting of the Independent Accountability Mechanisms (IAM) Network was preceded by reflections program at the Inter-American Development Bank (IDB) on 12 November 2018 organized by IDB’s Independent Consultation and Investigation Mechanism (MICI). The MICI reflections meeting was primarily to provide IDB Group staff an appreciation of the experience and observations of eight years of case management and to foster institutional reflection on actions that may contribute to improving sustainability outcomes by strengthening the design, execution and supervision of IDB Group operations.

The Annual Meeting of the IAM Network was hosted by the World Bank’s Inspection Panel, timed to coincide with the celebration of the 25th anniversary of the Inspection Panel. President Kim of World Bank participated in the celebration event and delivered a statement emphasizing the importance as well as the contributions of accountability mechanisms to the financing institutions.

The meeting also included updates by members on their last year’s work plans and significant milestones, including policy reviews. It is generally observed that there is an increase in the complaint load in all the IAMs and are actively engaged in the outreach activities. In addition, discussions related to the various IAM Network Working Groups were held with status on the reports.

A final session was opened to interested CSOs/NGOs to discuss IAM-civil society collaboration. The CSOs/NGOs were primarily focused on challenges on internal finance institutions’ co-financed projects and possible ways to overcome them including likely ways of harmonization.

Accountability at 25: Reflections on IFI Accountability Mechanisms Conference, Washington, D.C., 15 November 2018

This symposium at the American University was hosted by American University Washington College of Law, the Human Rights Center at the University of Pretoria, and the Bank Information Center. A draft civil society report on IAM’s “best/good practices” was presented. Moderated panel discussions on topics ranged from (i) immunity and accountability, (ii) compliance accountability and remediation, (iii) dispute resolution, and (iv) future of accountability mechanisms and related reforms on incentive structures.

ADB’s Accountability Mechanism Seminar, Washington, D.C., 16 November 2018

The ADB North America Representative Office organized and moderated a seminar convened at Johns Hopkins University in Washington, D.C., which Dingding Tang, Warren Evans, and Sushma Kotagiri provided a presentation to about 30 participants on the AM Policy, with particular attention to the planned initiatives to (i) strengthen national finance institutions safeguard compliance by adopting clear accountability policies, (ii) strengthen the capacity of ADB borrower executing and implementing agencies, ADB staff, and interested stakeholders to improve GRM at the project level including, and (iii) OSPF’s analytical work on a project-level GRM in Viet Nam that was published into a case study outlining various enablers for a functional GRM. There was a considerable interest in both the financial institutions’ accountability and the GRM support. The participants included representatives from several NGOs (both European and American), mediation and problem-solving facilitation practitioners from the Washington, D.C. area and academia.
Updates from the Complaint Receiving Officer (CRO)

As of 31 December 2018, the CRO received 95 complaints, 39 of which are AM-related, and fourteen of which were forwarded as follows:

11 complaints on the following projects were forwarded to the SPF:

Kazakhstan: Akмола Electricity Distribution Network Modernization and Expansion Project, Project No. 46933-014 (Jan 15)
Armenia: Sustainable Urban Development Investment Program - Tranche 1, Project No. 42417-023 (Feb 12)
Bangladesh: SASEC Second Bangladesh—India Electrical Grid Interconnection, Project No. 44192-016 (Feb 22)
Georgia: Adjaristsqali Hydropower Project, Project No. 47919-014 (Mar 8)
Mongolia: Ulaanbaatar Urban Services and Ger Areas Development Investment Program – Tranche 1, Project No. 45007-004 (Mar 28)
Pakistan: National Highway Network Development in Balochistan Project, Project No. 47281-001 (April 6)
Pakistan: Peshawar Sustainable Bus Rapid Transit Corridor Project, Project No. 48289-002 (May 10)
Pakistan: Flood Emergency Reconstruction and Resilience Project, Project No. 49038-001 (June 11)
Nepal: Tanahu Hydropower Project, Project No. 43281-013 (August 23)
Sri Lanka: Greater Colombo Wastewater Management Project, Project No. 36173-013 (Sept 11)
Georgia: Batumi Bypass Road Project, Project No. 50064-001 (Oct 2)

Three complaints on the following projects were forwarded to the CRP:

Georgia: Sustainable Urban Transport Investment Program - Tranche 3, Project No. 42414-043 (June 21 and Oct 11)
India: South Asia Subregional Economic Cooperation Road Connectivity Investment Program-Tranche 2, Project No. 47341-003 (Oct 22)

As of 31 December 2018, the 11 complaints forwarded to the SPF, three complaints forwarded to the CRP, and 25 complaints pending with the CRO awaiting compliance with minimum requirements under the AMP 2012, in terms of sector, 19 are in transport, eight in energy, and 10 in water and other urban infrastructure services, and two in agriculture, natural resources, and rural development. (see Figure 2), and in terms of location, 16 are from Central and West Asia, 20 from South Asia, two from Private Sector, and one from East Asia. (see Figure 3). The 39 complaints (forwarded to SPF 11; forwarded to CRP 3) and pending with the CRO 25) exclude the 56 complaints received by the CRO which are not AM-related (regarding procurement, recruitment, integrity violations and non-ADB assisted projects). The procurement-related complaints, recruitment matters, and complaints with allegations of integrity violations on ADB-assisted projects have been forwarded by the CRO to the relevant ADB department / office.
Updates from the Complaint Receiving Officer (CRO) (continuation)

Fig. 2: Sector of 39 AM-related Complaints Received and Forwarded to SPF (11); CRP (3) as of 31 December 2018

Fig. 3: Location of 39 AM-related Complaints Received and Forwarded to SPF (11); CRP (3) as of 31 December 2018