**An impactful and accountable World Bank**

**A proposal to reform the transparency of the**

**World Bank IDA and IFC in 2023**

This paper outlines three reforms to transparency that should accompany any future reform package at the World Bank Group (WBG). Improving transparency in the areas set out below is fundamental to monitoring and measuring the success of the WBG generally, and the reforms specifically, to deliver impact, mobilise private capital, and ensure adequate transparency and accountability to communities.

**Summary**

The worsening climate crisis, increased public indebtedness, the Russian invasion of Ukraine, and the Covid 19 pandemic have all contributed to stagnating progress in meeting the sustainable development goals (SDGs) and plateauing (or reversing) progress in reducing the number of people living in extreme poverty. Multilateral development banks (MDBs), and the WBG in particular, will play a vital role in overcoming these crises. However, there is broad recognition that MDBs are currently unable to respond at the necessary scale. Calls to optimise the capital adequacy frameworks of MDBs seek to maximise lending capabilities have been accompanied with renewed focus on the need for MDBs to increase private capital mobilisation.

In January 2023 the WBG published [“Evolving the World Bank Group’s Mission, Operations, and Resources: A Roadmap”](https://documents1.worldbank.org/curated/en/099845101112322078/pdf/SECBOS0f51975e0e809b7605d7b690ebd20.pdf) (the Roadmap). The Roadmap is a response to requests from WBG shareholders at the 2022 Annual Meetings to outline reforms that will equip the WBG to address mounting challenges in global development. In the coming months the contents of the Roadmap will come under significant attention, with calls to more fundamentally shift the operating model of the WBG.

**Embedding Transparency in WBG Reform**

While reform of the WBG is both necessary and timely, the success of any reform efforts can only be ensured if there is sufficient transparency within the WBG to monitor progress in key areas. Increases in the quantity of funding from the WBG must be matched with increases in the quality of funding.

The constituent institutions of the WBG currently perform relatively strongly in assessments of transparency. In [Publish What You Fund’s DFI Transparency Index](https://www.publishwhatyoufund.org/dfi-index/2023/), IFC were ranked as the most transparent non-sovereign operation while the World Bank (IBRD/IDA) were ranked as the fourth most transparent sovereign operation. However, there remain key aspects of each institutions transparency practices that require improvement.

To provide more specificity to the reforms, we propose three ambitious yet achievable goals to take affect under upcoming WBG reforms:

1. ***Publish project level impact/results data*** ***for IFC investments***
	1. baseline impact data/ex ante predictions using indicators drawn from the AIMM system’s Project Outcome Indicators and Market Outcome Indicators;
	2. midline impact data against baseline indicators; and
	3. endline impact data against baseline indicators (published at point of divestment or loan maturity)
2. ***Publish project level private capital mobilisation data for IFC investments***
	1. sources and amounts of co-financed funds; and
	2. the nature of co-financed funds (e.g., equity, debt, mezzanine financing, senior debt)
3. ***Increase transparency of World Bank Accountability Mechanism (AM) and IFC Compliance Advisor Ombudsman (CAO)***
	1. introduce policy requiring WBG borrowers and investees to inform project-affected people about the availability of the AM and CAO
	2. provide assurance on an investment-by-investment basis that project-affected people have been informed about the availability of the AM and CAO

Publish What You Fund successfully advocated for the inclusion of first and second recommendations in the IDA Private Sector Window investments made by IFC following the IDA 20 replenishment. While applying them to the entirety of IFC’s portfolio is a larger undertaking, their prior adoption for IDA PSW investments is indicative of their feasibility. Publish What You Fund has spoken to past and current WBG staff to ensure that the recommendations are realistic and actionable.

**Rationale**

While the World Bank (IDA/IBRD) disclose results for the majority of its projects, IFC does not publish impact/results data for the large majority of its investments. This makes it difficult to tell whether or not investments are delivering results in the manner expected. IFC developed the [Anticipated Impact Measurement and Monitoring (AIMM)](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/development%2Bimpact/aimm) system that provides a framework for predicting and measuring ex-ante and ex-post project outcomes and market outcomes. Additionally, IFC have developed a series of [sector frameworks](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/development%2Bimpact/aimm/measuring-impact) that outline appropriate indicators for tracking impact. Taken together, these provide the necessary tools for IFC to disclose disaggregated (project-level) results data.

The need to mobilise private capital to fund the SDGs and to close the climate financing gap is well established. Yet, IFC does not publish disaggregated mobilisation data, making it impossible to assess which investments, sectors, or instruments are most effective at mobilisation. Improving the publication of mobilisation data would allow WBG shareholders to effectively measure and hold IFC to account in increasing mobilisation rates. This is an achievable goal. Although current disclosure of disaggregate mobilisation data is low across MDBs and bilateral DFIs, some DFIs including the US International Development Finance Corporation are exploring ways to disclose this information.

The WBG has two independent accountability mechanisms (IAMs); the [World Bank Accountability Mechanism (AM)](https://www.worldbank.org/en/programs/accountability) and the [IFC/MIGA Compliance Advisor Ombudsman (CAO)](https://www.cao-ombudsman.org/). IAMs are important mechanisms that allow project-affected people to file complaints about the policy compliance of MDB investments or projects. However, neither the AM nor the CAO have a requirement that borrowers or investees inform project-affected people about the presence of the IAM. This limits the utility of each mechanism as there is no guarantee that project-affected people are aware that they may access it. [An External Review of IFC/MIGA E&S Accountability, including CAO’s Role and Effectiveness](https://www.cao-ombudsman.org/sites/default/files/downloads/ExternalReviewofIFCMIGAESAccountabilitydisclosure.pdf) noted that “a first requirement for any accountability mechanism to work is that there is knowledge of its existence by different stakeholders” and recommended “IFC/MIGA should ensure that clients (including FI sub-projects) that are required to establish grievance mechanisms provide information to affected communities both about the client’s grievance mechanism and about CAO”. The Inter-American Development Bank have enshrined similar requirements in its [Environmental and Social Policy Framework](https://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=EZSHARE-110529158-160&_gl=1*av66p9*_ga*MTI2NzUzNDEwOC4xNjc2NDg0NTIy*_ga_9CQ7ER9V3F*MTY3NjQ4NDUyMS4xLjAuMTY3NjQ4NDUyNi41NS4wLjA.); “The Borrower will inform the project-affected parties about the grievance process, including access to the IDB’s Independent Consultation and Investigation Mechanism, in the course of its community engagement activities”.