



# Independent Complaints Mechanism Public Consultation on the Draft Policy

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## Activity Report

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## 1. INTRODUCTION

The Development Finance Institutions (DFIs) — DEG, FMO, and Proparco — and the Independent Expert Panel (the “Panel”) wish to express their sincere appreciation to all internal and external stakeholders who participated in and supported the Independent Complaints Mechanism (ICM) Public Consultation (the “Public Consultation”) on the Draft ICM Policy, held from 20 August 2025 to 17 October 2025.

Over the 8.5-week consultation period, a diverse range of stakeholders—including national and international non-governmental and civil society organizations, peer financial institutions, independent accountability mechanisms, DFI clients and subject matter experts—provided substantive feedback on the Draft ICM Policy.

This report provides the background, a summary of the activities undertaken, and related stakeholder engagement data<sup>1</sup> of the Public Consultation. Furthermore, it presents key data on the methods by which stakeholders submitted feedback, the stakeholder types that contributed, and their respective region and country representation<sup>2</sup>. A further report that summarizes and responds to stakeholder feedback will be published with the final ICM Policy in 2026.

## 2. ABOUT THE ICM

Established in 2014, the ICM is a joint initiative of the participating DFIs:

- [DEG](#) (Deutsche Investitions-und Entwicklungsgesellschaft)
- [FMO](#) (Nederlandse Financierings-Maatschappij voor Ontwikkelingslanden N.V.)
- [Proparco](#) (Société de Promotion et de Participation pour la Coopération Économique, SA)

DEG, FMO and Proparco are leading European DFIs with a common mission to promote private investments that foster sustainable development in emerging markets by financing sustainable private investments.

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<sup>1</sup> [Appendix I: ICM Public Consultation ‘Engagement’ Data](#)

<sup>2</sup> [Appendix II: ICM Public Consultation ‘Feedback’ Data](#)

The DFIs are committed to achieve positive sustainable development outcomes through their investments. At the same time, the DFIs recognize that such development can also have a negative impact on local communities and the environment.

The DFIs pursue environmental and social sustainability by applying their respective policies on environmental and social sustainability. Nevertheless, during the course of an investment, projects may have adverse impacts on the environment and people, including communities, workers or others.

The ICM ensures the right to be heard for complainants who believe that they have been or may be adversely impacted by DFI financed operations.

The ICM aims to provide predictable, transparent and equitable processes through which complainants can raise their concerns, and through which complaints may be resolved.

- Through its dispute resolution function, the ICM uses mediation and facilitation to address concerns of complainants, by engaging the complainant, the client and other parties in collaborative processes.
- Through its compliance function, the ICM determines whether a DFI's non-compliance with its environmental and social policies is connected to harm, recommends ways to address non-compliance and related harm, and draws lessons for current and future DFI Financed Operations.

The ICM also provides advice to the DFIs based on its experience and related international good practice and undertakes outreach activities to raise awareness of the ICM.

### **3. THE ICM REVIEW & UPDATE PROCESS (2022-2025)**

The DFIs are committed to regularly reviewing and, where necessary, updating the ICM Policy to ensure it remains robust, effective, accessible, and properly structured to guide the complaints process, while serving the needs of stakeholders as intended.

In 2022, the DFI Management Boards launched the ICM Policy Review process and appointed an independent expert to conduct a high-level review of the ICM Policy—including document analysis, peer benchmarking, and stakeholder interviews—and produce a report identifying key policy gaps, issues, and opportunities. The report also

helped build consensus among the DFIs on the priority policy areas for revision. The Policy Review Report was finalized in 2023 and made broad recommendations in line with accepted good international practice and in response to stakeholder concerns and interests.

The ICM Policy Update Process was initiated in 2024, during which the DFIs consulted a select group of external stakeholders—including non-governmental organizations and subject-matter experts—on the ICM Policy. Subsequently, a joint working group — comprising the ICM Panel and DFI representatives— was established to reflect on stakeholder feedback, consider the recommendations of the Policy Review Report, and begin preparing the Draft ICM Policy.

The drafting process was facilitated by an independent external facilitator with the aim of reaching consensus on the proposed policy revisions. It was agreed that where the ICM Panel and the DFIs did not reach consensus, the Panel would highlight their differing views in the Draft ICM Policy when it was shared for public consultation, and stakeholders would be encouraged to share their views on the outstanding points.

The Draft ICM Policy was approved for formal public consultation by the DFI Management Boards in July 2025.

## 4. THE ICM PUBLIC CONSULTATION (AUGUST – OCTOBER 2025)

### 4.1. Aims & Objectives

The primary aim of the Public Consultation was to seek feedback on the Draft ICM Policy prior to its finalization and adoption by the DFIs, to ensure it meets the needs of its intended stakeholders and can be effectively implemented by the DFIs and the ICM Panel.

The consultation process achieved this by:

- **Proactively identifying and engaging stakeholders** with an interest in the ICM to inform them about the Public Consultation.
- **Providing stakeholders with adequate time and multiple methods** to review the Draft ICM Policy and submit their feedback.

- **Delivering various consultation activities** for stakeholders to share their views, ask questions, and discuss the Draft ICM Policy with representatives of the DFIs, the Panel, and other key stakeholders.

#### 4.2. Management & Delivery

The Public Consultation was managed by representatives of the DFIs' ICM Complaints Offices, with support from a variety of internal stakeholders.

Additionally, the Panel provided extensive input in an advisory capacity on the approach to stakeholder engagement and the development of formal communications.

Furthermore, an independent external consultant, Samantha Dierckx of The Greater Good Consulting Company, was appointed as the ICM Public Consultation Coordinator to support the management and delivery of the Public Consultation on behalf of the DFIs.

These internal and external stakeholders worked collaboratively to define and agree on the approach and activities for the Public Consultation, including, but not limited to:

- **Providing a framework** to communicate with stakeholders, collect their data and feedback, and manage privacy and confidentiality matters.
- **Identifying key stakeholder groups** and relevant individuals and organizations representing diverse contexts, geographies, and interests in the ICM.
- **Providing communication platforms** and employing methods that supported inclusivity and accessibility, whilst ensuring clear understanding and easy access to information on the Public Consultation.
- **Organizing online and in-person consultation activities** that enabled engaging, insightful and confidential dialogue on the Draft ICM Policy.

#### 4.3. Key Stakeholders

The DFIs welcomed feedback and engagement from all stakeholders on the Draft ICM Policy; however, it was recognized that certain key stakeholder groups would have significant interest in the revised policy and should be proactively targeted for communication during the Public Consultation period.

The key stakeholder groups identified included:

- project-affected individuals, communities, and related groups;
- community-based organizations (CBOs);
- international, regional, and national civil society organizations (CSOs) and non-governmental organizations (NGOs);
- DFI clients and customers;
- government departments and inter-governmental organizations and initiatives;
- peer financial institutions;
- other Independent Accountability Mechanisms (IAMs); and
- academics, subject-matter and legal experts in environmental, social, human rights and accountability mechanisms.

The DFIs, the Panel and the Public Consultation Coordinator drew on their existing global networks to create a ‘Key Stakeholder Mailing List’ that prioritized these key stakeholder groups.

A list of 546 potential stakeholders — representing 290 unique organizations and individuals from diverse contexts and geographies — was compiled to ensure broad dissemination of information to these priority groups and others closely connected to the ICM.

Additionally, the DFIs, the Panel and the Public Consultation Coordinator leveraged other organizational networks to reach stakeholders who may have not been accessible through conventional channels.

#### **4.4. Communication**

The DFIs used several platforms and methods to communicate with stakeholders and ensure access to information on the Draft ICM Policy and Public Consultation.

##### ***ICM Public Consultation Website***

The primary communication platform was a dedicated Public Consultation website — <https://icm-consultation.org/> — developed, hosted, and managed by the Public Consultation Coordinator to ensure independence from the DFIs in collecting and processing stakeholder data.

The website was designed to meet international accessibility standards for both desktop and mobile devices, featuring clear navigation to information on all the ICM context, the Draft ICM Policy, participation in online and in-person activities, and submission of feedback on the Draft ICM Policy.

The website also offered several integrated online forms to allow stakeholders to make general enquiries, submit feedback on the Draft ICM Policy — through a series of topic-specific questions or by uploading a document — and register for online and in-person consultation activities. Additionally, stakeholders were able to contact the Public Consultation Coordinator via email if they experienced accessibility or connection issues with the forms.

All website content was carefully written to accommodate stakeholders with varying levels of understanding of the subject matter and a Frequently Asked Questions page was included to support comprehension.

### ***General Communication***

As noted in [Section 4.3. Key Stakeholders](#), a ‘Key Stakeholder Mailing List’ was compiled and the Public Consultation Coordinator sent information directly to these stakeholders on a regular basis, encouraging them to visit the Public Consultation website, review the Draft ICM Policy, participate in the online and in-person consultation activities, and provide feedback in writing.

The DFIs supported communication efforts by announcing the Public Consultation on their respective ICM web pages, sharing updates via company social media accounts where appropriate, and engaging with internal and external stakeholders through regular business activities, providing links to the Public Consultation website to ensure access to the most up-to-date and accurate information.

The Panel also shared information with stakeholders within their professional networks, at relevant meetings and events, and through their ICM role.

### ***Language Accessibility***

While the official language of the Draft ICM Policy and Public Consultation was English, unofficial translations of the Draft ICM Policy were prepared in French and



Spanish by a translation agency and made available on the website. Furthermore, an embedded ‘translation’ plugin on the website allowed stakeholders to select their preferred language for viewing site content. Additionally, stakeholders were informed that they could submit enquiries and/or provide written feedback on the Draft ICM in any language.

#### **4.5. Consultation Activities, Engagement & Feedback**

As the DFIs operate globally and the key stakeholders of the ICM represent diverse groups across multiple geographies, it was considered essential to provide as many stakeholders as possible the opportunity to share their views, ask questions, and discuss the Draft ICM Policy with representatives of the DFIs, the ICM Panel, and other key stakeholders; to achieve this, the DFIs delivered several consultation activities—both online and in-person—during the Public Consultation period. Additionally, as part of internal outreach efforts, the DFIs and ICM Panel presented and discussed the Draft ICM Policy with Members from the Supervisory Boards of the DFIs.

[Appendix I: ICM Public Consultation ‘Engagement’ Data](#) provides further information on the number of stakeholders who participated in these consultation activities and their respective stakeholder type, region and country representation.

[Appendix II: ICM Public Consultation ‘Feedback’ Data](#) provides further information on the methods by which stakeholders submitted feedback, and their respective stakeholder type, region and country representation.

#### **Zoom Webinars**

The DFIs and ICM Panel co-hosted three ‘Open to All’ webinars and one ‘DFI Client Only’ webinar on Zoom. They were delivered over a seven-day period in the middle of the consultation period; aiming to accommodate different regional time zones to maximize participation and to give stakeholders sufficient time to review the Draft ICM Policy before attending.

Each webinar was up to 2 hours in duration and included a presentation on the Draft ICM Policy delivered jointly by a DFI representative and a ICM Panel representative. The presentation was followed by a question and answer (Q&A) and general discussion

session facilitated by an independent external facilitator, David Fairman of the Consensus Building Institute (CBI).

To support accessibility, all webinars provided participants with the option to view live captions translated into their preferred language, and one webinar with a high proportion of French-speaking participants was supported by live simultaneous translation into French.

The webinars were recorded for internal note-taking purposes only and the Q&A and general discussion sessions were transcribed and anonymized so they could be included in the consolidated record of stakeholder feedback on the Draft ICM Policy.

### ***Regional Stakeholder Meeting, Kenya – 29 September 2025***

On behalf of the DFIs, DEG organized a half-day meeting — with representatives of CSOs, CBOs, and other individuals (e.g., legal experts, mediators, human rights practitioners) from region — to gain an understanding of the community perspective.

The DFI and ICM Panel representatives provided an introduction to the ICM and presented the main changes to the Draft ICM Policy. The presentation was followed by an interactive and dynamic discussion session — facilitated by an experienced facilitator from the region — on a variety of topics including the ICM mandate, function, policy scope, principles and the complaint handling process.

### ***Regional Stakeholder Workshop, The Netherlands – 14 October 2025***

On behalf of the DFIs, FMO hosted a substantive half-day workshop at their headquarters in The Hague, primarily for Independent Accountability Mechanisms (IAM) practitioners, international CSOs and NGOs, and other experts (e.g. legal experts, mediators, human rights practitioners) who work with affected persons or communities within the accountability or development context.

The workshop included a presentation on the Draft ICM Policy, delivered jointly by a DFI representative and a ICM Panel representative. The presentation was followed by a question and answer (Q&A) and general discussion session facilitated by an independent external facilitator, David Fairman of the CBI.

The discussion topics were selected by the participants and included safeguards against retaliation, policy scope, complaints eligibility, deferral, compliance review, governance, and financial intermediaries.

## **5. NEXT STEPS**

As at the date of this report, the joint working group — comprising the ICM Panel and DFI representatives — are continuing their collaborative process to review all stakeholder feedback and finalize the ICM Policy.

The ICM Policy will be finalized following approval of the Management Boards and endorsement by the Supervisory Boards of the DFIs, anticipated in December 2025.

A formal response to stakeholders will be published with the final ICM Policy and it will detail how feedback has been considered and integrated. The updated ICM Policy is expected to come into effect in the first quarter of 2026, with further details be provided with the formal response.

## APPENDIX I: ICM PUBLIC CONSULTATION ‘ENGAGEMENT’ DATA

### All Activities - Number of Registrations & Actual Attendance

	Registrations	Attendees	% Attendance
25/09/25 - Client Webinar	18	8	44%
29/09/25 - Africa Webinar	19	9	47%
01/10/25 - Asia Webinar	11	6	55%
02/10/25 - Americas Webinar	9	8	89%
29/09/25 - Kenya In-Person	24	8	33%
14/10/25 - Netherlands In-Person	13	12	92%
<b>Totals</b>	<b>94</b>	<b>51</b>	

### NOTES

- All numbers (i.e., ‘Registrations’& ‘Attendees’) exclude the facilitator, ICM Panel and DFI representatives, and other internal observers.
- Low number of ‘Attendees’ for the '29/09/25 Kenya In-Person' was attributed to Nairobi Airport strike and subsequent local travel disruption.
- Some organisations sent more than one representative to a single activity and some sent different representatives to several activities, therefore the ‘Attendees’ numbers do not represent the total number of organisations represented across all activities. For example, an IAM sent two representatives to a single Webinar and the same representatives to an In-Person meeting. Only the ‘25/09/25 - Client Webinar’ was attended by single representatives from ‘unique’ organizations.

### All Activities - Number of Attendees by Stakeholder Type

Stakeholder Type - All Activities	No. of Attendees	% of All Attendance
Academia	1	2%
DFI Client	8	16%
CSO/NGO	21	40%
Financial Institution	6	12%
Independent Accountability Mechanism	11	22%
Inter-Governmental Organisation	1	2%
Subject Matter Expert	3	6%
<b>Total</b>	<b>51</b>	

**All Activities - Number of Attendees by Stakeholder Region**

Stakeholder Region - All Activities	No. of Attendees	% of All Attendance
Africa	16	31%
Asia	2	4%
Europe	24	47%
Latin America	2	4%
North America	7	14%
<b>Total</b>	<b>51</b>	

**All Activities - Number of Attendees by Stakeholder Country**

Stakeholder Country - All Activities	No. of Attendees	% of All Attendance
Argentina	1	2%
Canada	3	6%
Germany	7	13%
Georgia	1	2%
France	2	4%
Kenya	6	12%
Liberia	1	2%
Luxembourg	1	2%
Paraguay	1	2%
Nigeria	2	4%
Philippines	2	4%
Senegal	1	2%
South Africa	4	8%
Switzerland	1	2%
The Netherlands	7	13%
Uganda	2	4%
United Kingdom	5	10%
United States	4	8%
<b>Total</b>	<b>51</b>	

**Individual Activities – Number of Attendees by Stakeholder Type**

	25/09/25 Client Webinar	29/09/25 Africa Webinar	01/10/25 Asia Webinar	02/10/25 Americas Webinar	29/09/25 Kenya In-Person	14/10/25 Netherlands In-Person
<b>Stakeholder Type – Individual Activities</b>	<b>8</b>	<b>9</b>	<b>6</b>	<b>8</b>	<b>8</b>	<b>12</b>
Academia				1		
DFI Client	8					
CSO/NGO		4	1	3	8	5
Financial Institution		2	1	2		1
Independent Accountability Mechanism		2	3	1		5
Inter-Governmental Organisation		1				
Subject Matter Expert			1	1		1

**Individual Activities – Number of Attendees by Stakeholder Region**

	25/09/25 Client Webinar	29/09/25 Africa Webinar	01/10/25 Asia Webinar	02/10/25 Americas Webinar	29/09/25 Kenya In-Person	14/10/25 Netherlands In-Person
<b>Stakeholder Region - Individual Activities</b>	<b>8</b>	<b>9</b>	<b>6</b>	<b>8</b>	<b>8</b>	<b>12</b>
Africa	4	3		1	8	
Asia			2			
Europe	2	5	4	1		12
Latin America	2					
North America		1		6		

## APPENDIX II: ICM PUBLIC CONSULTATION ‘FEEDBACK’ DATA

### Number of Submissions by Methods of Contribution

Method of Contribution	No. of Submissions	No. of ‘Unique’ Stakeholders Represented
Online Questionnaire	2	2
Email	3	3
Formal Letter or Document	10	29
Webinar Verbal	15	14
<b>Total</b>	<b>30</b>	<b>48</b>

### NOTES

- The total for ‘No. of Stakeholders Represented’ is significantly higher (i.e., 48) compared to ‘No. of Submissions’ (i.e., 30) due to two ‘Formal Letter or Document’ submissions being made by two large CSO/NGO collectives.
- Furthermore, the subtotal of 29 for ‘Formal Letter or Document’ for ‘No. of Unique Stakeholders Represented’ has been adjusted down by 2 (compared the total of 31 on Page 15) as two of the CSO/NGO organisations submitted/endorsed two separate letters submissions and therefore should not be counted twice.
- Additionally, the subtotal of 14 for ‘Webinar Verbal’ for ‘No. of Unique Stakeholders Represented’ has been adjusted down by 1 (compared the total of 15 on Page 16) as one Financial Institution had two representatives attend and contribute to the same webinar and therefore they should not be counted twice.
- Due to their discussion-based format rather than a Q&A structure, in-person consultation meetings (i.e., in Kenya and the Netherlands) are not included in these figures.

### Email Submissions - Stakeholder Type and Country

No.	Stakeholder Type	Stakeholder Country
1	Subject Matter Expert	Australia
2	Subject Matter Expert	The Netherlands
3	DFI Client	Cambodia

**Formal Letter or Document Submission with Stakeholder Type and Country**

No.	Stakeholder Type	Stakeholder Country
1	CSO/NGO 15 Stakeholders Represented	United Kingdom
		The Netherlands
		United States
		Czech Republic
		Germany
		Germany/Uzbekistan
		Guatemala
		Kenya
		Indonesia
		The Netherlands
		Nigeria
		Nigeria
		Nigeria
		Senegal
		United States
2	CSO/NGO 8 Stakeholders Represented	The Netherlands
		The Netherlands
		The Netherlands
		The Netherlands
		Malawi
		Nigeria
		Senegal
		Uganda
3	CSO/NGO	Germany
4	Subject Matter Expert	Switzerland
5	Subject Matter Expert	Luxembourg
6	Subject Matter Expert	Luxembourg
7	Subject Matter Expert	Uganda
8	Government	The Netherlands
9	Inter-Governmental (Environment)	Switzerland
10	Inter-Governmental (Human Rights)	United States



**Webinar Verbal Contribution with Stakeholder Type and Country**

No.	Webinar	Stakeholder Type	Stakeholder Country
1	25/09/25 - Client Webinar	DFI Client	South Africa
2	25/09/25 - Client Webinar	DFI Client	United Kingdom
3	29/09/25 - Africa Webinar	Anonymous	Anonymous
4	29/09/25 - Africa Webinar	CSO/NGO	Germany
5	29/09/25 - Africa Webinar	CSO/NGO	Liberia
6	01/10/25 - Asia Webinar	Independent Accountability Mechanism	Germany
7	01/10/25 - Asia Webinar	CSO/NGO	United Kingdom
8	01/10/25 - Asia Webinar	Financial Institution	United Kingdom
9	02/10/25 - Americas Webinar	CSO/NGO	Nigeria
10	02/10/25 - Americas Webinar	CSO/NGO	United Kingdom
11	02/10/25 - Americas Webinar	CSO/NGO	United States
12	02/10/25 - Americas Webinar	Financial Institution	Canada
13	02/10/25 - Americas Webinar	Financial Institution	Canada
14	02/10/25 - Americas Webinar	Independent Accountability Mechanism	India
15	02/10/25 - Americas Webinar	Subject Matter Expert	United States



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