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DOCUMENT OF THE INTER-AMERICAN DEVELOPMENT BANK

PROPOSAL FOR THE NEW ACCESS TO INFORMATION POLICY

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Background for the New Proposed Access to Information Policy

- I. *Commitment to transparency.* In the context of the Ninth Capital Increase (IDB-9) approved by the Board of Governors in 2010, the Inter-American Development Bank (hereinafter, the “Bank” or the “IDB”) reaffirmed its commitment to transparency and accountability by approving an Access to Information Policy structured on the basis of maximum access. This policy was part of the institutional reforms approved by the Board of Governors in the Cancún Declaration.¹
- II. *The current Access to Information Policy.* With the policy² approved in 2010, the Bank made progress in terms of access to information by promoting a culture of an open bank, by means of the proactive disclosure of information, especially with regard to Bank operations, as well as by facilitating access to information through management procedures and response to information requests from the public.
- III. *Advances in access to information at the regional and global levels.* While the Bank has made progress in terms of openness with the adoption of the policy in 2010, the right of access to information has evolved rapidly over the last decade, giving rise to new international standards and best practices related to access, which has translated into greater demands from democratic society to increase transparency and accountability. This reality has also been reflected at the regional level, where the countries of Latin America and the Caribbean have adopted robust regulatory frameworks on transparency and access to information, positioning Latin America and the Caribbean as one of the most advanced regions in the world in this area.
- IV. *Evaluation of policy implementation.* In 2018, for the evaluation by the Office of Evaluation and Oversight (OVE) on the implementation and results of the commitments assumed following the Ninth Capital Increase, OVE acknowledged that, with respect to the adoption of the 2010 Policy, while it had contributed to an institutional culture of greater openness and accountability, at the same time, it highlighted the importance of introducing changes to the Policy and making progress on governance.³
- V. *Preparation of a policy profile.* Considering the foregoing and given the growing need to update the Policy to respond to new international trends, resulting from the advancement of the right to access to information, the Bank began a Policy review process in 2019. As part of this process, the Board of Executive Directors (hereinafter, the “Board”) approved the “Update to the Access to Information Policy. Policy Profile” (hereinafter, the “Profile”), which was submitted for public consultation to receive feedback from the public and private sectors, academia, and various civil society organizations.⁴

¹ Inter-American Development Bank, 2010, *Annual Meeting of the Board of Governors. Cancún Declaration*, available at: <https://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=35121613>.

² Inter-American Development Bank, 2010, *Access to Information Policy*(document GN-1831-28).

³ Inter-American Development Bank, 2018, *IDB’s Ninth General Capital Increase: Implementation and Results*, available at: <http://dx.doi.org/10.18235/0001278>.

⁴ The public consultation plan with respect to the Policy Profile and the New Policy Draft was approved by the Board of Executive Directors on 4 November 2019. Inter-American Development Bank, 2019, *Update to the Access to Information Policy. Policy Profile* (document GN-1831-49).

- VI. *Recent IDB Group policies.* In 2020, after the consolidation of the merge-out process,⁵ the Inter-American Investment Corporation (IDB Invest) revisited its operational policies, and as part of this process, its Board of Executive Directors approved an Access to Information Policy that establishes: (1) that “IDB Invest recognizes the solid developments made in recent years to advance the recognition and exercise of the right to access information as a fundamental human right”; and (2) the principle of “maximizing access to information.”⁶
- VII. *Proposed draft policy.* On the basis of the Profile and the results of the public consultation process, Management prepared a proposed update to the Access to Information Policy that was submitted for consideration by the Policy and Evaluation Committee (PEC) in March 2020. In connection with the discussion of this proposal, the Board identified a set of issues which it asked Management to analyze and develop in order to prepare a new proposed update to the Access to Information Policy.
- VIII. *PEC’s recommendations.* PEC’s recommendations on the proposed policy update submitted by Management included the following: (a) the importance of access to and openness of information through proactive disclosure, using clear, direct, easy-to-understand language; (b) reviewing the content and scope of the exceptions for purposes of applying them restrictively; (c) assessing the relevance of maintaining the negative override, while redefining the application of the positive override; (d) defining a clear test or procedure for assessing the likelihood that the disclosure of information could cause harm that outweighs the benefit of its disclosure; and (e) strengthening the structure for governance, supervision, and policy review.
- IX. *Update to the policy proposal in the context of the pandemic.* The pandemic caused by COVID-19 in early 2020 and the social and economic impacts thereof in the region’s countries required the Bank to focus its efforts on support for its member countries in order to address the health crisis and its adverse effects on the Latin American and Caribbean population, especially among the most vulnerable sectors and groups. While the pandemic caused a temporary delay in the discussion of the new policy proposal, at the same time, the crisis led to the need to use direct contracting and more nimble mechanisms that made even clearer the importance of access to information for adequate monitoring of the use of public resources in the region’s countries.
- X. *New administration and a new policy proposal.* Taking the foregoing into account, the Bank’s Management has again taken up the process of updating the Access to Information Policy as a tool that in addition to increasing the Bank’s transparency and openness, allows it to strengthen dialogue and relations with its member countries, as well as with stakeholders, through a regulatory framework that meets the high international standards in this field.

⁵ The IDB merged out its private sector operations into IDB Invest in 2016, at the same time strengthening both the capital and lending capacity of IDB Invest.

⁶ IDB Invest Access to Information Policy, II, C, a “IDB Invest operates under a presumption in favor of disclosure with respect to all the information it produces and receives that does not fall within the scope of the exceptions established in this Policy. To maximize access to information, IDB Invest commits to proactively disclose as much public information as possible regarding its governance and activities in accordance with this Policy.”

ACCESS TO INFORMATION POLICY

1. Objective, Coverage, and Scope

- 1.1 **Objective.** To acknowledge the right of access to information and improve accountability and transparency in the activities and results of the Inter-American Development Bank (hereinafter, the “Bank” or the “IDB”). Through this Policy, the Bank seeks to facilitate and strengthen the process of dialogue with stakeholders and the general public.
- 1.2 **Coverage and scope.** The Policy will apply to all information in the Bank’s possession.⁷ It will also cover the information in the Bank’s possession with respect to the activities of the Office of Evaluation and Oversight (OVE) and the Independent Consultation and Investigation Mechanism (MICI).

2. Principles

- 2.1 In accordance with its objective, this Policy is guided by the following principles:
- a. **Maximizing access to information and proactive disclosure.** The IDB will disclose information in a timely manner, facilitating its access through the use of all practical means, promoting meaningful engagement by stakeholders with the Bank.
 - b. **Clear and narrow exceptions to disclosure.** The IDB will protect information whose disclosure could generate harm that outweighs the benefit of making it public.
 - c. **Explanation of decisions and right to review.** When denying access to information, the Bank will provide an explanation for its decision.

3. Standard for Disclosure and Nature of the Information

- 3.1 **Standard for disclosure.** The Bank discloses all information that is not protected pursuant to Section 4 of this Policy. Following is an illustrative, but not exhaustive, list of information on topics that reflect the IDB’s high commitment to disclosure:
- a. **Information on environmental and social impacts and risks.** The IDB works in close collaboration with its borrowers⁸ to provide and disclose information on the environmental and social impacts and risks stemming from the projects it finances, and to engage stakeholders in a meaningful, effective, inclusive, and culturally appropriate way, in accordance with its Environmental and Social Policy Framework (ESPF).⁹ In particular, the Bank will disclose the information included in Annex I.
 - b. **Information in relevant local languages.** Information relating to projects classified in environmental and social impact categories A or B in accordance with the ESPF will be disclosed in the local languages relevant for the involvement of stakeholders.

⁷ Including the Multilateral Investment Fund, IDB Lab.

⁸ “Borrower,” for purposes of this policy, means government agency or client responsible for aspects pertaining to an IDB-financed project (investment loans, investment grants, and investment guarantees), regardless of the funding source, including preparation, execution, monitoring, and supervision activities.

⁹ [Environmental](#) and Social Policy Framework (document GN-2965-23).

In addition, the IDB will disclose the materials related to the public consultations conducted by the Bank, upon completion of the consultation process.

- c. Information on development results.** The Bank will disclose information on development results generated by its projects, including the development results of individual projects, as well as its own performance in fulfilling its development objectives.
 - d. Information on procurement.** In its commitment to transparency in the performance of its activities, the Bank will disclose information on corporate and operational procurement processes, in accordance with its respective procurement policies.¹⁰
- 3.2 Nature of the information.** For purposes of applying this Policy, the Bank distinguishes information originating with third parties and information produced by the Bank in the context of its work.
- a. Proprietary country or client information.** Borrowers and clients are owners of the information that they provide to the Bank in the context of preparing the projects that the IDB will support or invest in. Therefore, the opinions of the borrowers and clients with respect to the content and timeliness of disclosure will be taken into account for purposes of the disclosure or protection of this information.
 - b. Information produced by the Bank.** In the context of its work, the Bank produces corporate and operational information that it proactively makes available to the public. This may include information that a member country considers, if disclosed, would impact its ability to manage its financial or economic policies and that, consequently, would need to be protected. In these cases, the member country will serve written notice of the reasons justifying the protection of the information, and the criteria established in Section 4.2 of this Policy will be observed.

4. Exceptions

- 4.1** The Bank will disclose all information that is not protected under one of the exceptions to disclosure indicated in this section.¹¹ These exceptions are established based on an assessment of the likely adverse effects that would be caused by the disclosure of information, which would outweigh the benefits of its disclosure.

¹⁰ IDB Corporate Procurement Policy (document GN-2303-28); Policy for the Selection and Contracting of Consulting Firms for Bank-executed Operational Work (document GN-2765-4); Policies for the Procurement of Goods and Works Financed by the Inter-American Development Bank (document GN-2349-15); and Policies for the Selection and Contracting of Consultants financed by the Inter-American Development Bank (document GN-2350-15); and their future amendments.

¹¹ The Policy shall not be construed as a waiver, express or implied, of the IDB's privileges and immunities under the Agreement Establishing the Bank, international conventions or agreements, or any applicable legislation, nor does it confer contractual or other rights on any party.

- a. **Personal information and communications.** Information that, if disclosed, would affect the privacy of individuals, including personal information and communications¹² of Bank staff and any other individual,¹³ shall be protected.
- b. **Safety and security.** Information that, if disclosed, could compromise the safety or security of Bank staff, their families, or any other individual; Bank assets; or the national security of member countries, shall be protected.
- c. **Information provided in confidence.** Information that is in the possession of the Bank, that was not created by the Bank, that the originator thereof has identified as confidential and has not made public shall be protected. The Bank shall not disclose information provided in confidence by member countries.
- d. **Deliberative information.** Information that, if disclosed, would affect the integrity of the decision-making process or inhibit the frank and candid exchange of ideas in the deliberative processes of the Board of Governors, Board of Executive Directors, and Management, as well as between the Bank and its clients or third parties, shall be protected. The IDB will make the final decisions, outcomes, and agreements arising out of these processes public when the deliberative process has concluded, and a decision has been made.
- e. **Financial information.** Financial information that, if disclosed, would affect the financial or commercial interests of the Bank and its operations, shall be protected.
- f. **Legal, disciplinary or investigative matters.** Information that, if disclosed, would affect attorney-client relations or matters in legal dispute, or under negotiation by the Bank, or information that, if disclosed, could subject the Bank to undue risk of legal dispute or violate applicable law, shall be protected. This includes disciplinary and investigatory information generated in or for the Bank that, if disclosed, would affect an investigation or the administration of justice, except documents intended for public release pursuant to the MICI.¹⁴

4.2 ***Harm test.*** For purposes of determining what information should be protected in accordance with these exceptions, the Bank will undertake a harm test in accordance with the following criteria:

- a. The disclosure of the information may give rise to substantial and identifiable harm;
- b. The identified harm outweighs the benefit of disclosure; and
- c. The protection of the information is the most suitable means to prevent the identified harm.

¹² Personal information and communications include personal data as defined by the IDB Group's Personal Data Privacy Policy ([document](#) GN-3030-1), which governs the handling of personal data by the Bank.

¹³ However, this exception shall not limit the provision of information concerning specific staff members, which may be released at the request of the staff member, or in accordance with Bank policies intended to ensure that staff members meet their personal legal and financial obligations. Moreover, the disclosure of personal data may occur in accordance with the IDB Group's Personal Data Privacy Policy.

¹⁴ The Independent Consultation and Investigation Mechanism (MICI) is the IDB Group mechanism dedicated to investigating complaints from persons adversely affected by projects financed by the IDB, IDB Lab, or the Inter-American Investment Corporation (IDB Invest) as a result of potential noncompliance with any of their operational policies, including the Access to Information Policy. For more information, visit the following website: <https://www.iadb.org/en/mici>.

- 4.3 **Outcome and registration of the harm test.** The outcome of the test undertaken in accordance with Section 4.2 and the decision made on protecting the information shall be registered for purposes of greater effectiveness and consistency in the application of the Policy with respect to exceptions to disclosure. For such purposes, the Implementation Guidelines will determine the mechanism whereby the outcome of the test is registered.
- 4.4 **Redaction and public versions.** For purposes of application of the principle of maximizing access to information and proactive disclosure, priority will be granted to redaction or the preparation of public versions in order to avoid the full nondisclosure of the information. The Implementation Guidelines will establish the rules governing the redaction procedure and the preparation of public versions.

5. Positive Override

- 5.1 On an exceptional basis, the Bank may decide to provide access to certain information normally subject to the exceptions to disclosure, if it determines that the benefits outweigh the potential harm, provided that the Bank is not legally obligated to nondisclosure and the information has not been provided under an express restriction of disclosure.
- 5.2 The override decision related to information of the Board of Governors or the Board of Executive Directors shall be made by the latter. The rules and procedures governing the application of the positive override with respect to information of the Board of Governors and the Board of Executive Directors shall be set forth in guidelines approved by the Board of Executive Directors. The override decision on all other information normally subject to exceptions to disclosure shall be the responsibility of the Access to Information Committee in first and last resort, in accordance with the Implementation Guidelines.

6. Classification and Declassification of Information

- 6.1 **Classification and declassification.** The Policy establishes the use of an information classification system with the following categories: “Public” and “Confidential.” This Policy’s Implementation Guidelines will establish the rules and procedures governing this classification system, as well as for the declassification of information.
- 6.2 **Simultaneous disclosure and routine disclosure.** Within the information classified as public, the Bank will disclose certain information at the time of its distribution to the Board of Executive Directors, which will be considered “Public” information for “simultaneous disclosure,”¹⁵ and it will also make all routinely disclosed information available to the public in a timely, proactive manner.
- 6.3 **Confidential information to be disclosed over time.** The confidential information category includes information that initially needs to be protected and that, over the course of time, may be eligible for declassification for disclosure over time in 1, 5, 10, or 20 years, based on when this information no longer requires protection and

¹⁵ For example, documents for simultaneous disclosure include the following: sovereign guaranteed loan proposals, country strategies, sector framework documents, technical cooperation documents above US\$3 million, operational policies, and documents distributed for information classified as public.

can be disclosed. This type of information may be classified in the category “Confidential - Disclosed over time.”

7. Information Request Mechanism

7.1 The procedure that the Bank will use for processing information requests submitted by the public is as follows:

a. Where to access the information. Public information on the IDB and its activities can be obtained online on the institutional website: www.iadb.org.

b. How to submit an information request. Information not available on the IDB’s institutional website can be requested as follows:

1. Through an online form available on the website at: <https://www.iadb.org/en/access-information/information-request>, or at the email provided on the website: www.iadb.org;
2. Information requests can also be submitted in person, by telephone, or online at the Bank’s offices.
3. The Bank will facilitate access to persons with disabilities. For such purposes, the Implementation Guidelines will identify mechanisms facilitating such access.

Requesters are not required to provide reasons supporting their information request.

c. Confidentiality of the identify of parties requesting information. Anonymous requests will not be considered. When asked to do so, the Bank will maintain the identity of the requesting party confidential.

d. Languages. Information requests may be submitted in any of the IDB’s four official languages. The information requested will be provided in the language in which it is available. In cases of requests related to projects whose environmental and social impact classification is category A or B, pursuant to the Environmental and Social Policy Framework, such requests may be answered in the relevant local language, in an accessible and culturally appropriate manner.

e. Response times. Upon receiving an information request, the IDB will:

1. Acknowledge receipt of the information requests within five business days following receipt thereof.
2. Provide the response within 30 calendar days.
3. Respond within 45 calendar days to requests for historical information. For such purposes, historical information will be understood as all information in the Bank’s possession during the course of its official work prior to (approval date of this policy).

If additional time is required to respond, due to the scope or complexity of the request received, the IDB will communicate in writing with the requesting party, informing them of the delay and indicating the estimated time required to provide a response.

- f. **Responses to information requests.** In cases where the Bank receives requests for information that may be subject to protection, for purposes of providing a response, the criteria for the harm test established in Section 4.2 of this Policy shall be applied, as well as the procedure established in the Implementation Guidelines.

8. Review Mechanism

- 8.1 The requesting party whose access to information has been denied or restricted may request a review thereof, alleging that the Policy has been violated. A two-stage review mechanism has been established for such purposes:
- a. Phase one. The Access to Information Committee will be responsible for the first review stage for denials of access to information requests that do not involve information of the Board of Governors or the Board of Executive Directors. The rules and procedures governing the review of denial or restriction of information of the Board of Governors and Board of Executive Directors will be established in guidelines approved by the Board of Executive Directors; and
 - b. Phase two. In the event that the Access to Information Committee confirms the denial of the access to information request, the requesting party may request that this denial be reviewed by the External Review Panel established in Section 9.4 of this Policy. The Panel may not review decisions by the Access to Information Committee if the review would be based on the use of the positive override.
- 8.2 The Access to Information Committee or External Review Panel, as applicable, will make its decision within 30 calendar days following the notification of receipt of the applicable review request. When these bodies, as applicable, require additional time due to the scope or complexity of the review request received, they will serve written notice to the requesting party to inform them of the delay and indicate the estimated time required to issue a decision.

9. Governance

- 9.1 This Policy establishes the following governance structure:
- 9.2 **Access to Information Office (ATI).** The Access to Information Office is the technical unit responsible for the coordination, application, and implementation of the Policy in all Bank activities. ATI will be located in the Office of the Secretary of the Bank and will be responsible primarily for: (a) coordinating and establishing the guidelines and protocols necessary for the proper implementation of the Policy; (b) providing support to the vice presidencies, departments, and units in the creation of procedures for the classification and declassification of information; (c) providing support to the Access to Information Committee with regard to Policy implementation; (d) developing and coordinating the Bank's Public Information Center for receiving, managing, and responding to information requests; and (e) supporting the Office of the Secretary's management of the Access to Information Committee and the External Review Panel.
- 9.3 **Access to Information Committee (AIC).** The AIC is an administrative body chaired by the Chief of Staff of the Office of the President and will also include the Executive Vice President, the Vice President for Finance and Administration, the Vice President for Countries, and the Vice President for Sectors and Knowledge, or

their respective alternates in the event of their absence. The Secretary of the Bank will serve as secretary of the AIC. The AIC will be responsible for: (a) overseeing the general application of the Policy; (b) interpreting the Policy in accordance with the Policy's guiding principles; (c) examining and resolving requests for positive overrides on information that does not pertain to the Board of Governors or the Board of Executive Directors, pursuant to Section 5.2 of this Policy; (d) examining and resolving in first instance requests for review received from the public whose requests were denied by the Bank; and (e) approving the departmental classification instructions.

- 9.4 **External Review Panel.** The Panel is an external body whose function is to review and resolve on second instance requests for review submitted by the public, in accordance with the Policy. The Panel is independent of Management and will comprise three members appointed by the Board of Executive Directors at the proposal of the President of the Bank. They will serve for a three-year term, which may be renewed for up to a maximum of six years.

10. Information Related to the Activities of the Independent Offices of the Bank

- 10.1 **Classification and disclosure of information related to the activities of the independent offices of the Bank.** The Office of Evaluation and Oversight (OVE) and the Independent Consultation and Evaluation Mechanism (MICI) will be responsible for classifying and disclosing information related to their activities in accordance with this Policy and in line with the Evaluation Policy Framework IDB Group and the MICI Policy, respectively.
- 10.2 **Disclosure of documents by OVE and the MICI distributed to the Board of Executive Directors.** OVE's evaluation reports containing recommendations, as well as documents by the MICI, which, in accordance with its policy, should be considered by the Board of Executive Directors, will be disclosed once considered. For such purposes, the meeting of the Board of Executive Directors, when required, will take place within 15 business days after the date of discussion in the respective Committee. Other documents by OVE and the MICI, distributed to a Committee for information, shall be disclosed pursuant to section 6.2 of this Policy.
- 10.3 **Resolution of discrepancies regarding classification.** When Management does not agree with the classification assigned by OVE or the MICI with respect to the information generated by these offices, the office in question and Management will discuss the case with a view to finding a resolution. If a resolution is not reached, either of the parties will submit the matter to the Board of Executive Directors for its decision, which will be final and which will be recorded in minutes citing the grounds for the decision. For such purposes, the External Review Panel will provide the Board of Executive Directors with a technical opinion within a period of 15 business days as of the date of the Panel's notification.

11. Implementation Guidelines

- 11.1 The Implementation Guidelines will establish rules for: (i) disclosure of information, classification and declassification of information; (ii) response to information requests; (iii) rules governing the operation of the Access to Information Committee and the External Review Panel, including those governing conflicts of interest that

may affect members of those bodies, and the timeframes for their decisions and technical opinions; and (iv) the mechanisms for resolving discrepancies in the classification of information between Management and the independent offices of the Bank. These Guidelines will be approved by the Access to Information Committee and subject to prior consultation with the Board of Executive Directors.

12. Policy Review

- 12.1 Each year, the Access to Information Office will prepare and send to the Board of Executive Directors a report on the status of the Policy's implementation, which will be made public. Every four years, Management will submit to the Board of Executive Directors an analysis on the need to review the Policy based on the lessons learned in its implementation, in order to incorporate international trends and best practices in the field to ensure the Policy's continued effectiveness.

13. Effective Date and Compatibility with Other Applicable Regulations

- 13.1 **Effective date.** The provisions of this Policy will take effect five months after approval by the Board of Executive Directors and will apply to all information in the IDB's possession as of that date. This Policy replaces in its entirety the Access to Information Policy (document GN-1831-28) approved in 2010 with an effective date of 1 January 2011. All information in the IDB's possession prior to the effective date of this Policy will be governed by the Policy in effect at the time the information was generated and/or received by the Bank, including the classification and declassification procedures established for such purposes, except when such information may be disclosed in accordance with the principles and standards set forth in this Policy.
- 13.2 **Portfolio of preexisting IDB operations administered by IDB Invest.** For non-sovereign guaranteed operations that were approved by the IDB and, as a result of the consolidation of non-sovereign guaranteed activities are being administered by the Inter-American Investment Corporation¹⁶ (IDB Invest), the IDB Access to Information Policy approved in 2010 with an effective date of 1 January 2011 will remain applicable, except as discussed in Section 13.1 above.
- 13.3 **Cross-booked or cofinanced operations.** For those non-sovereign guaranteed operations financed through cross-booking or cofinanced between the IDB and IDB Invest, and managed by the latter, the IDB Invest Access to Information Policy will apply.¹⁷
- 13.4 **Joint documents.** Joint IDB and IDB Invest documents that are distributed to their respective Boards of Executive Directors will be classified in accordance with each institution's access to information policy. With respect to such joint documents,¹⁸ where there are differences in classification due to application of the respective regulatory frameworks, and when there is information that needs to be protected in accordance with the provisions of Section 4 of this Policy, the protection of the information shall prevail.

¹⁶ Operations referred to jointly as the "preexisting IDB portfolio."

¹⁷ Available at <https://www.idbinvest.org/en/access-information-policy>.

¹⁸ This group of documents includes, for example, country strategies, OVE documents, and audit documents involving both institutions.

ANNEX I – ENVIRONMENTAL AND SOCIAL INFORMATION

In accordance with the Environmental and Social Policy Framework, the Bank will disclose documentation relating to the environmental and social risks and impacts and the management of all projects classified in categories A and B prior to the analysis mission to be conducted during project preparation. Moreover, and without the following list being exhaustive, the Bank will disclose the following information and the respective updates thereof, including any environmental and social evaluation reports or management plans, whether new or additional, prepared after approval of the project, when applicable:

1. The Summary of the Environmental and Social Review, required for all category A and B projects, and for those FI projects classified as having high or substantial risk;
2. Environmental and/or social evaluations and management plans prepared during project preparation and execution, for example:
 - a. Environmental and social impact evaluations
 - b. Environmental and social analyses
 - c. Sociocultural analyses
 - d. Environmental and social management plans
 - e. Resettlement plans
 - f. Stakeholder engagement plans
 - g. Indigenous peoples plans
 - h. Environmental and social audits
3. Environmental and social management systems
4. Project-specific environmental and social frameworks
5. Environmental and social monitoring and supervision reports
6. Environmental and social action plans
7. Public consultation reports.