

Annual Report 2023



The Office of the Compliance Advisor Ombudsman (CAO) is the independent accountability mechanism (IAM) for the International Finance Corporation (IFC) and the Multilateral Investment Guarantee Agency (MIGA), members of the World Bank Group. CAO's mandate is to address complaints from people affected by IFC and MIGA projects and to enhance environmental and social project outcomes.

Learn more at www.cao-ombudsman.org.

Front Cover: CAO team meets with Ngäbe and Buglé community members in Norte de Santa Fé, Panama during compliance monitoring of a complaint. (Photo: CAO, 2023)

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About This Report

This Annual Report highlights the activities and performance of the Office of the Compliance Advisor Ombudsman (CAO). It covers fiscal year 2023 (FY23), which spans from July 1, 2022 to June 30, 2023, with some data showing trends over several years. The report features our work across 29 countries, summarizes progress towards CAO's strategic priorities, and provides data on our global caseload and operational outcomes.



Compagnie des Bauxites de Guinee (CBG) and community representatives of 13 villages in Sangaredi, supported by three CSOs, conduct a site visit with the support of CAO after COVID-19 travel restrictions are lifted. (Photo: CAO, 2022)

Our Mission

CAO's mission is to serve as a fair, trusted, and effective independent accountability mechanism that facilitates access to remedy for project-affected people and enhances the environmental and social performance of IFC and MIGA.

Reporting directly to the IFC and MIGA Boards, CAO delivers on its mandate through the three complementary functions shown below.

Dispute Resolution



CAO helps resolve issues raised about the E&S impacts of IFC/MIGA projects through a neutral, collaborative, problem-solving approach and contributes to improved outcomes on the ground.

Compliance



CAO carries out reviews of IFC/MIGA compliance with E&S policies, assesses related harm, and recommends remedial actions to address noncompliance and harm where appropriate.

Advisory



CAO provides advice to IFC/MIGA and their Boards with the purpose of improving IFC's/MIGA's systematic performance on E&S sustainability and reducing the risk of harm.

A Conversation with CAO's Director-General, Janine Ferretti



CAO team meets with representatives of Indorama Agro in Uzbekistan. (Photo: CAO, 2023)

What highlights from CAO's work over the past year stand out to you the most?

The [CAO Policy](#) directs CAO to facilitate access to remedy; underscores complainant choice in the CAO process; provides opportunities for IFC, MIGA, and their clients to resolve issues earlier; and emphasizes remedial time-bound actions to address project-related harm. We spent much of the past two years operationalizing these policy elements into action. More broadly, we continually ask ourselves how we can be more effective in facilitating access to remedy for project-affected people.

We also focused much of our effort this year on becoming a more responsive CAO. The CAO Policy puts a premium on responsiveness by establishing clearer timelines and communications from CAO with stakeholders. This is an area that has not always been easy for CAO due to our heavy caseload, but we are making important progress in these areas. For example, in FY23 we reduced the number of backlog cases

to 26 percent of our total caseload, down from 58 percent in FY21. Also, we have made good progress in achieving timelines, particularly in the eligibility and assessment phases of our cases. We still have work to do before we achieve our target of zero cases in backlog in 2025, but we are on track.

We also invested a lot of effort this year engaging IFC and MIGA to identify how to better provide remedial solutions to address concerns raised by project-affected people. While CAO can facilitate access to remedy, the actual provision of remedial solutions happens through IFC/MIGA Management Action Plans (MAPs) in response to the compliance process. We published [advisory work](#) on the "remedy gap" to help IFC/MIGA strengthen their responsiveness in this area. We have also identified opportunities for remedy through [dispute resolution](#). Notably, an [external evaluation](#) of our dispute resolution work found that constructive IFC/MIGA engagement in the process can make a difference by contributing to positive outcomes for the parties involved.

What trends emerged among the cases CAO managed this year?

We have seen some ongoing challenges in delivering development in a way that does not negatively impact project-affected people or the environment. One is the lack of capacity of IFC/MIGA clients in identifying and responding to E&S impacts and risks. How effectively IFC and MIGA assess and manage client capacity limitations is key to ensuring that project E&S risks and impacts are adequately addressed throughout the project cycle.

Building on that, it is important that IFC and MIGA utilize the leverage they do have to ensure that the E&S requirements and gaps identified during their due diligence and supervision are, in fact, addressed by their clients. The core of this is understanding the capacity limitations and gaps of their clients and other partners, and how to build necessary capacity to meet the Performance Standards.

Another key challenge is meaningful consultation with project-affected people. Consultation cannot be seen as a one-off objective, but should continue throughout the project cycle as continual engagement with affected communities. This will help anticipate and mitigate risks and strengthen project outcomes.

Threats and reprisals are a growing concern among the global community. What is CAO doing to address these concerns?

This is an issue that CAO takes very seriously, and one that we have systematically tracked since adopting our [Approach to Threats and Reprisals](#) five years ago. Our data over this time show that communities raise concerns about threats and reprisals in nearly half of our cases.

We have been working closely across the World Bank Group, including with the World Bank Accountability Mechanism, as well as with external partners, to consider best practices and approaches. With IFC and MIGA specifically, we are sharing knowledge and best practices about addressing threats and reprisals concerns. IFC and MIGA are intending to do more business in fragile and conflict-affected situations, which we know increases the potential for threats and reprisals risk. Our work in this area is, therefore, paramount.

Looking ahead, what will be CAO's key areas of focus?

In addition to our continued focus on threats and reprisals risk, we will deepen our analysis and engagement in relation to remedy and responsible exit, particularly as IFC and MIGA, and other development finance institutions (DFIs), develop their approach in these areas. This year, CAO produced three [advisory notes on remedy and responsible exit](#) and submitted formal comments to IFC and MIGA to inform their approach to these critically important areas. We will continue our dialogue with IFC and MIGA, as well as with DFIs, civil society, independent accountability mechanisms, and other partners. CAO is committed to leading in this evolving space by sharing our insights and strengthening opportunities to provide remedy for people affected by project-related harms. Of course, we will also continue to work hard to eliminate the backlog by the end of 2025, as well as make progress in achieving time frames, which is necessary to CAO being able to facilitate access to remedy.

We will also start pulling together lessons learned from our casework that can help enhance the effectiveness of IFC and MIGA in managing E&S impacts and risks. This work will be particularly important as IFC begins to consider updating its Sustainability Framework.

Reporting and transparency about outcomes will also be a key focus. As we implement the CAO Policy, we are reflecting on what is working and what can be improved, and documenting our progress to reduce our backlog of cases and improve timelines. Building on this, we will be developing metrics to assess our effectiveness and the quality of our outcomes. Outcomes for the communities we work with, as well as for other stakeholders, are at the heart of facilitating access to remedy.

This report shows how we are making progress on many of these fronts, thanks to the deep commitment and hard work of CAO's staff, and we will strive toward further improvements in the year ahead.

CAO's Strategic Priorities: Overview and Progress

CAO seeks to continually improve its effectiveness in facilitating access to remedy for project-affected people, enhancing E&S performance, and fostering accountability and learning. In FY22, we conducted a strategic planning process to identify key priorities to meet this mandate and align our activities and resources to support effective implementation of the new [CAO Policy](#).

CAO's Five Strategic Priorities

1. **Effective case handling:** Reduce backlog of cases, ensure CAO Policy timelines are met, and facilitate access to remedy.
2. **Capture knowledge for impact:** Leverage insights from CAO's casework to increase learning on critical environmental and social topics.
3. **Strengthen engagement:** Work with internal and external stakeholders to enhance awareness, understanding, and trust in CAO's purpose and value.
4. **Enhance staff capacity and work environment:** Expand and deepen the skills and experience of CAO staff and consultants.
5. **Implement efficiencies in CAO operations:** Streamline processes, reduce time delays, and effect cost savings.

The CAO Policy, which replaced CAO's former Operational Guidelines, emphasizes facilitating access to remedy for project-affected people, placing particular emphasis on case-handling timelines and complainant choice in how complaints are handled. It also provides more opportunities for IFC, MIGA, and their clients to resolve concerns early and proactively.

In the first year of implementing our strategic priorities, and two years of implementing the CAO Policy, we have made considerable progress:

Effective case handling:

We reduced CAO's case backlog from 58 percent of the total caseload in FY21 to 26 percent at end of FY23. We also commissioned an [external evaluation](#) of our assessment and dispute resolution processes, which provided recommendations to streamline these processes that we are currently considering. We piloted our first [omnibus monitoring report](#), which covered five cases to streamline the monitoring process and frequency of reporting (see pp. 27-30). We also produced new internal engagement protocols for stakeholders involved in a case

Capture knowledge for impact:

Drawing on 10 years of casework, CAO produced three [advisory notes](#) for IFC/ MIGA and the wider development community on the pressing topics of improving remedy for project-affected people and responsible exit from investments (see pp. 33-35).

Strengthening engagement:

Externally, our outreach included collaborating with the regional civil society organizations (CSOs) and several other to host an [outreach event](#) in Beirut for the Middle East and North Africa region. Through the IAM Outreach Working Group, we conducted a survey of our outreach effectiveness. We also organized quarterly civil society roundtables, in person and virtually, to discuss topics such as dispute resolution and remedy. Internally, we strengthened engagement with IFC, MIGA, and their Boards to enhance understanding of CAO's processes and outcomes. This included participating in induction programs for the Boards and for World Bank Group staff, as well as briefing Executive Directors on topics including reprisals and case management.

Enhance staff capacity and work environment:

We launched a recruitment and onboarding plan, helped staff identify relevant training opportunities, and undertook multiple activities to improve employee well-being and retention, including recognition and leadership development.

Implement efficiencies in CAO operations:

We implemented digital transformations, including improved budget and case management systems, created efficiencies and helped to reduce case handling delays.

Our Caseload: Facts and Figures

We managed 58 cases from 29 countries this year, working with communities, companies, and other stakeholders to assess new complaints, facilitate dialogue processes, conduct compliance investigations, and monitor outcomes.

We handle many complex cases, typically spanning several years, which often involve large-scale projects, diverse community groups, multiple stakeholders, and remote or conflict-affected locations. This section provides a data overview of CAO's FY23 caseload by type of case, region, sector, and topic.

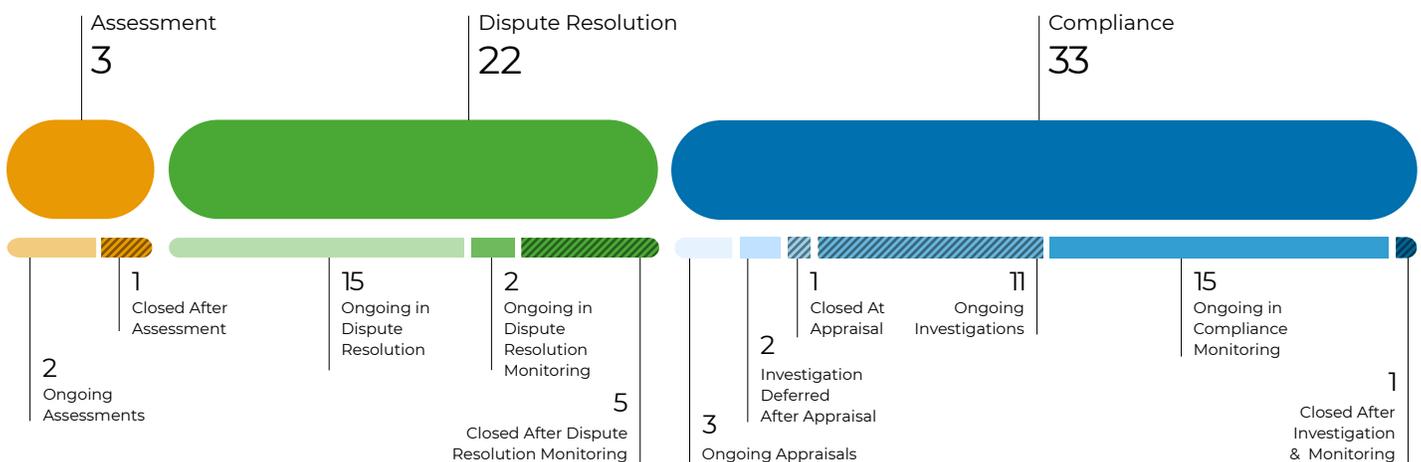
CAO determines whether a complaint is eligible to be taken forward based on three criteria:

1. The complaint relates to an active IFC/MIGA project.
2. The issues raised in the complaint pertain to CAO's mandate to address E&S impacts of the project.
3. The complainant may be affected by the harm raised in the complaint.

Case Status, End of FY2023

This year, CAO handled 58 cases from 29 countries (Figure 1). By the end of the year, CAO was handling 2 cases in assessment, 17 cases in dispute resolution, and 31 cases in compliance review. CAO had closed 1 case after assessment, closed 5 cases after dispute resolution monitoring, and closed 2 cases during compliance processes. Two cases were transferred from dispute resolution to compliance during the year. CAO deferred the decision to investigate in 2 cases to allow IFC, the client, and the complainants an opportunity to resolve issues directly (see p. 26 to learn more about deferrals).

Figure 1



Eligibility

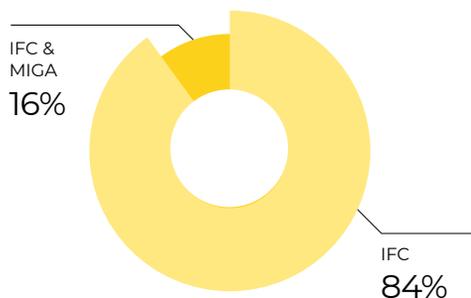
We accepted 12 new complaints this year, out of 22 reviewed for eligibility (see Figure 2). All 12 raised concerns about IFC infrastructure projects and the majority were filed by community members without the support of local, national, and international CSOs. Eight of these cases are in Africa, three in the Middle East, and one in Central Asia and Türkiye.

Referrals: The CAO Policy contains a provision that allows for good faith efforts with IFC/MIGA and/or the IFC/MIGA client to address complaint-related issues if the complainant consents. Following the complainants' preferences, CAO referred three complaints from Pakistan and one complaint from Egypt to IFC this year after finding them to be eligible. Of the four complaints referred to IFC in FY23, two returned to CAO for assessment during FY23.

Figure 2



Figure 3



Cases by Institution

All CAO cases handled in FY23 involve IFC. However, joint IFC and MIGA cases doubled this year to make up 16 percent of new cases (see Figure 3). These joint cases included seven new cases related to the Benban Solar Park in Egypt, supported by 13 active IFC investments and 12 MIGA guarantees. Three other IFC/MIGA cases involve hydropower projects—Nachtigal in Cameroon, Adjaristsqali in Georgia, and Bujagali in Uganda.

Cases in Countries Affected by Fragility and Conflict

IFC connects economic development with humanitarian needs by investing in private sector growth. About one-third of its projects are in countries classified as fragile and conflict-affected situations (FCS/IDA-17), and IFC has committed to increase this share of investments to 40 percent by FY30.

Around half (52 percent) of current CAO cases are in such countries, a similar level to FY22 (56 percent). Project-related risks in these countries that can make communities more

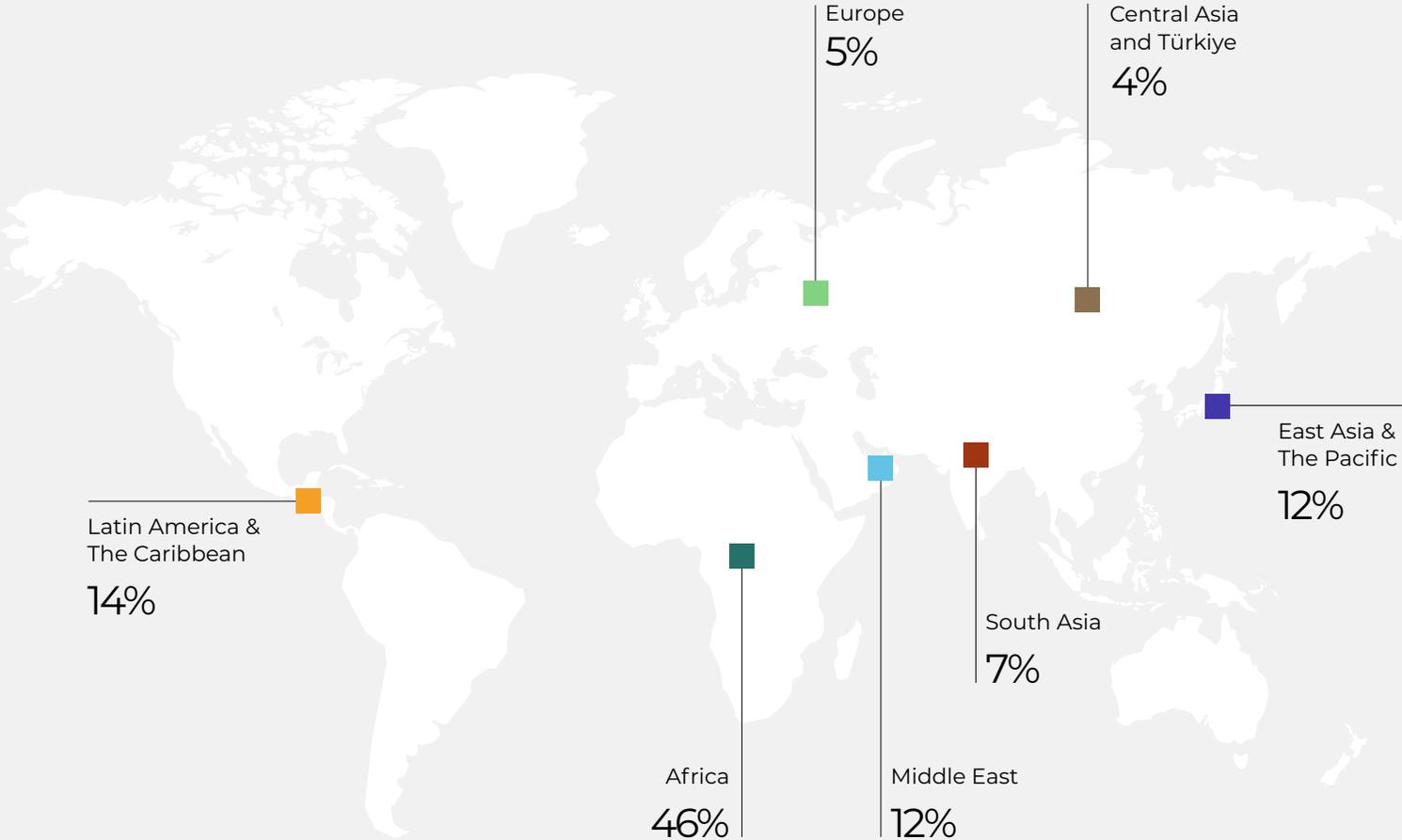
52% of current CAO cases are in countries classified as FCS/IDA-17

vulnerable, and are most relevant to CAO, include weak capacity among key actors and poor governance structures that can limit civic participation. People bringing cases from countries classified as fragile and conflict-affected also express increased concerns over threats and reprisals (see p. 12).

Cases by Region

This year, almost half our cases (46 percent) were located in Africa, followed by Latin America and the Caribbean (14 percent), with East Asia and the Pacific and the Middle East both at 12 percent. Historically, CAO has received a higher volume of complaints from Africa and Latin America, possibly a reflection of IFC's larger portfolio in those regions. However, the Middle East has been representing an increasing share of CAO's caseload, with 11 of 13 cases from the region (85 percent) received over the past 4 years. The full regional distribution of cases is shown on the map 1 below.

Map 1



Environmental & Social Issues

Monitoring the type of concerns communities are bringing to CAO helps us identify trends and improve our effectiveness. We track issues raised by complainants using the IFC/MIGA Performance Standards and cross-cutting topics such as land, water, air, women, and children (see Figure 4). This year, 59 percent of cases raised concerns that projects were impacting community health and safety, and 56 percent included concerns about E&S risk assessment

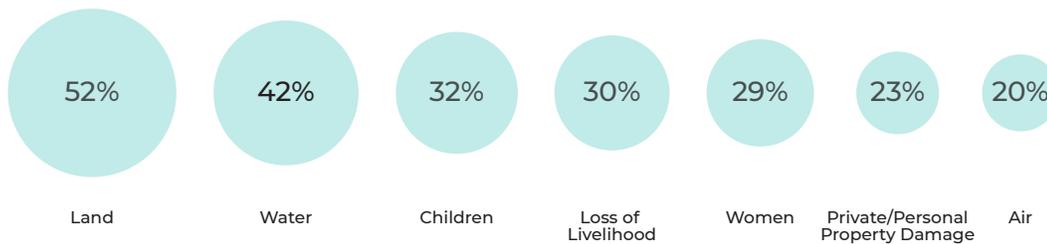
and management, including shortcomings in stakeholder engagement. Many new complaints this year raised labor concerns, and these issues are now represented in more than half of CAO's caseload (52 percent). Among cross-cutting indicators, complaints focused on natural resources were predominant, led by concerns about land (52 percent) and water (42 percent).

Figure 4

IFC/MIGA Performance Standards



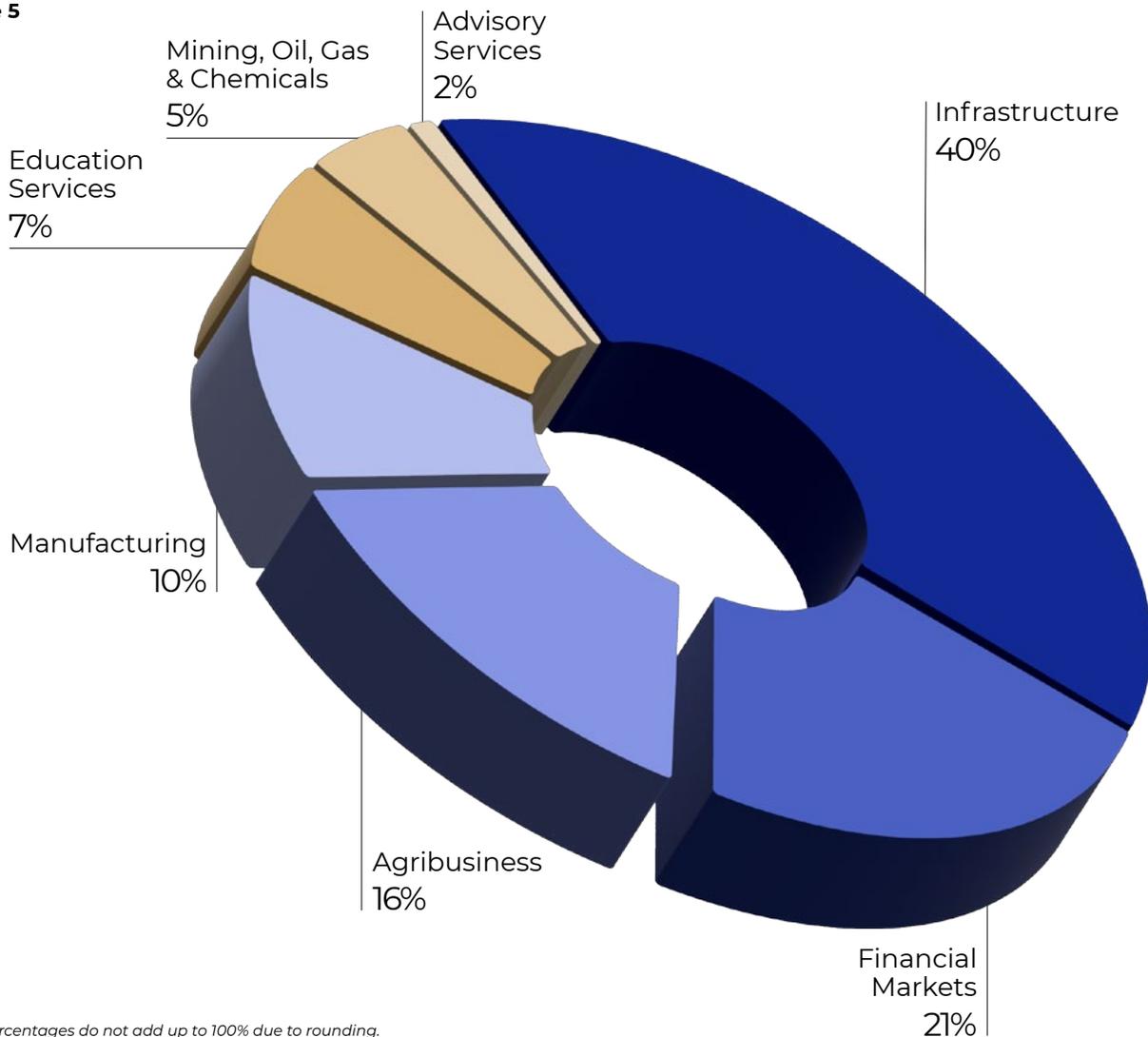
Cross-cutting Issues



Cases by Sector

High-risk, large infrastructure projects—primarily in the power sector and including hydropower, solar, and wind—continue to dominate our caseload at 40 percent (Figure 5). Next is the financial markets sector with 21 percent of cases. These projects include IFC investments in financial intermediaries (FIs) such as commercial banks, investment funds, and micro, small, and medium enterprises, where complainants typically raise concerns about the E&S impacts of subprojects in the power, mining, and agribusiness sectors. Overall, the agribusiness sector accounts for 16 percent of CAO cases, manufacturing for 10 percent, and extractive industries for 5 percent.

Figure 5



Note: Percentages do not add up to 100% due to rounding.

Addressing Concerns of Threats and Reprisals

CAO's effectiveness depends on people being able to raise concerns about an IFC/MIGA project freely and without fear. Reprisals are a growing global concern that jeopardizes access to CAO. Our data from FY18 to FY23 show that, 47 percent of CAO cases raised concerns of threats and reprisals. These concerns included attempts at intimidation, harassment, discriminatory treatment, withholding of entitlement, risks to livelihood or reputation, and threats of physical violence, criminalization, or incarceration. Complainants who raise concerns name public authorities as the source of threat in 28 percent of cases, the IFC/MIGA client company in 26 percent, both in 30 percent, and an unknown source in 16 percent.

During the same timeframe, 58 percent of CAO cases from FCS/IDA-17 countries raised reprisal concerns, compared with 35 percent from non-FCS/IDA-17 countries. Complainants raised reprisal concerns in over half of all cases from Central Asia and Türkiye, East Asia and the Pacific, and the Middle East. A wide range of sectors is affected, with the majority of education, agribusiness, manufacturing, and FI-related cases generating fears of reprisal.

When complainants are asked in monitoring and evaluation (M&E) surveys at the end of assessment whether they experienced any repercussions from submitting a complaint to CAO, 41 percent of respondents said that they did. Complainants reported: threats and reprisals such as intimidation by a company's human resources office; impacts and harm worsening; community pressure to drop the complaint; social programs/assistance from the company ending; IFC not appearing to receive the complaint positively; and targeting of the community and/or individual filing the complaint. Complainants also mentioned positive

Working with Others to Address Threats and Reprisals

Joint CAO, IFC and MIGA Working Group. Launched in FY23, this group is examining measures to assess, prevent, and respond to concerns of threats and reprisals in CAO cases.

Engaging the World Bank Accountability Mechanism. In June 2023, CAO organized a knowledge-sharing workshop to compare practices and approaches. Topics included how to approach about reprisals concerns with complainants, communicating with clients, and managing expectations.

IAM Reprisals Working Group. CAO participates in the group, sharing lessons learned and challenges when handling reprisals in its operations.

impacts, such as a company being more willing to talk with them after the complaint was filed.

Addressing this issue is critical to our work. This year, we hired an external consultant to evaluate CAO's procedures for managing risks and incidents of threats and reprisals against best practices. CAO will be addressing the recommendations and prioritizing actions related to the findings of this evaluation in the year ahead.

Partnering to Increase Access and Outreach

Project-affected communities cannot seek access to remedy if they do not know about CAO or how to engage with us. We therefore conduct outreach proactively to communities, civil society, and other interested stakeholders around the globe, often in partnership with the IAMs of other development finance institutions.

Improving engagement with our stakeholders is a strategic priority for CAO. This includes internal outreach with IFC, MIGA and their Boards, as well as World Bank staff, to enhance understanding of CAO's mandate and value addition, and share insights and learning from our work.



Ngābe and Buglé community members meet with the CAO team to hear compliance report findings in Norte de Santa Fé, Panama. (Photo: CAO, 2023)

Regional outreach

CAO co-hosted an outreach workshop for the Middle East and North Africa region in Beirut, Lebanon in July 2022. The event was coordinated with Arab Watch Coalition, the European Investment Bank, the Asian Infrastructure Investment Bank, the United Nations Development Program (UNDP), and the IAMs of the World Bank. Participants from Egypt, Iraq, Jordan, Lebanon, Morocco, Tunisia, and Yemen described challenges in bringing cases to the mechanisms, including due to reprisal risk and accessing meaningful remedy. Discussions also included improving transparency around regional development projects.



CAO, IAM, and Arab Watch Coalition partners convene in Beirut for an outreach workshop about the accountability mechanisms. (CAO, 2023)

CSO roundtables

CAO hosted four hybrid CSO roundtables in 2023, each attended by around 40 CSOs. Topics included updates on CAO's work, the role CSOs can play in helping complainants achieve dispute resolution outcomes, findings from CAO's advisory work on remedy, and IFC/MIGA's proposed approach to remedial action.



CAO brought together CSOs in Washington, D.C. to discuss insights from CAO's advisory work on remedy and responsible exit. (Photo: CAO, 2023)

IAM Network

CAO has been Chair of the IAM Network Secretariat since September 2019, and one of our roles was to support UNDP's Social and Environmental Compliance Unit to plan the network's four-day annual meeting in New York in October 2022. The event drew 120 attendees to discuss pressing issues including remedy and responsible exit, reprisals, access barriers, measuring effectiveness, and addressing rising complaints about financial intermediaries. Over 30 global CSOs working on accountability issues joined for a one-day roundtable with the mechanisms. CAO handed over its duties as Secretariat to the World Bank-Accountability Mechanism in January 2023. The next IAM Annual Meeting takes place in London in October 2023.



XIX IAMNet Annual Meeting in New York. (Photo: Esteve Sala/MICI-IDB, 2023)

Outreach effectiveness

CAO participates in the IAM Outreach Working Group, which meets regularly to coordinate activities and share good practices. This year, the working group conducted a review of the effectiveness of joint communication and outreach efforts over the past 5 years. This included a survey of 60 civil society organizations that had partnered in outreach workshops in the Asia, Africa, Central Europe, Middle East, and Latin America regions. The results pointed to the need for IAMs to work with their respective institutions to promote better project-level disclosures about access to the mechanisms, improve the quality of information on IAM websites, and simplify outreach materials to ensure they are accessible to communities.

Insights for the impact assessment community

In May 2023, CAO participated in the annual conference of the International Association for Impact Assessment in Kuching, Malaysia, with the IAMs of the African Development Bank, Asian Development Bank, European Bank for Reconstruction and Development, and World Bank. CAO shared insights on community health, safety, and security. The conference was attended by over 600 E&S impact assessment professionals from around the globe.

Understanding the Issues

Assessment of Complaints

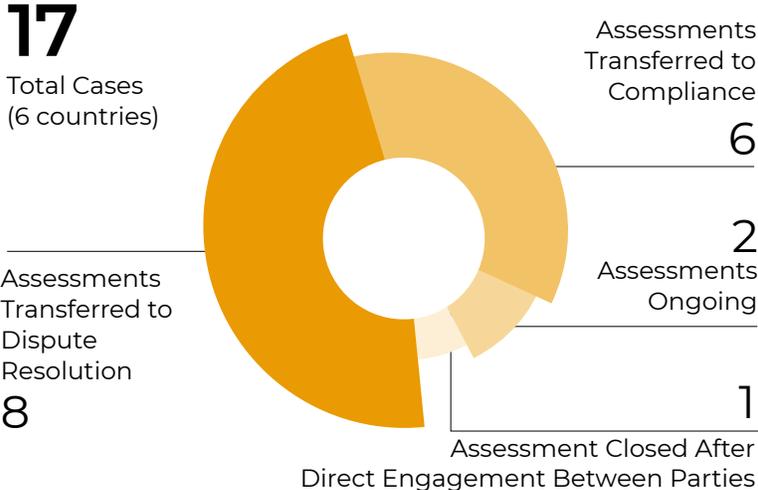
After finding a new complaint eligible, CAO conducts an assessment to better understand the issues and the perspectives of the complainants and IFC/MIGA client. During this process, we explain the options available so the parties can make an informed decision about whether they would like to address the complaint through a dispute resolution or compliance process.



CAO and community members meeting during assessment in Lomé, Togo. (Photo: CAO, 2023)

Cases in Assessment, FY23

Figure 6



This year, we transferred eight of the cases assessed to dispute resolution. These included 2 hydropower projects—[Nachtigal Hydropower Co-01](#) in Cameroon and [Karot Hydro-07/Jhelum River](#) in Pakistan, as well as 6 cases related to the Benban Solar Park projects in Egypt. Six cases were transferred to compliance: 4 from Cambodia ([Financial Intermediaries 01-03](#), and [04](#)), 1 from Pakistan ([HBL-01](#)), and 1 from Togo ([LCT-03](#)).

CAO encourages complainants and company representatives to resolve issues directly whenever possible, which benefits everyone involved. This year, we closed 1 case after assessment in this way, [Benban Solar-03](#) in Egypt. Assessment for 2 cases are ongoing.

Finding Solutions Through Dialogue

Dispute Resolution

In our dispute resolution work, we bring communities and companies together to address E&S concerns about an IFC/MIGA project through a voluntary problem-solving process. Our goal is to help identify solutions that meet the interests of everyone involved. Empowering complainants to make their voices heard is essential to effective dispute resolution. CAO's dispute resolution specialists and local mediators build participants' capacity to contribute to the dialogue and help design a collaborative process where both sides have ownership of the solutions and outcomes. If parties reach agreement through the dispute resolution process, CAO monitors implementation of the agreement and the situation. We also document good practices from our work to contribute to learning in the evolving field of resolving development disputes.

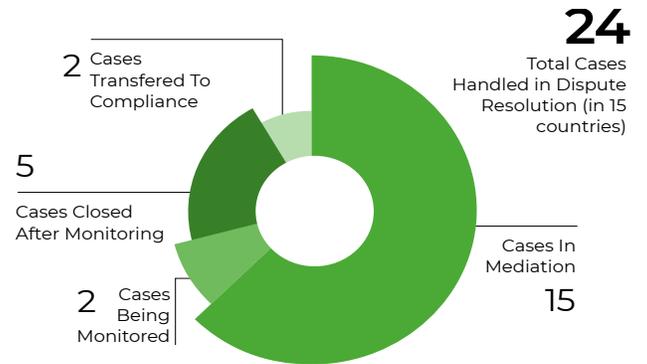


After months of dialogue regarding boreholes' rehabilitation and construction, community and CBG company representatives, along with CAO, and local authorities sign handover in Guinea. (Photo: CAO, 2023)

Cases in Dispute Resolution, FY23

This year, CAO handled 24 dispute resolution cases in 15 countries (Figure 7). Two cases reached final agreement and were transferred to monitoring. Two cases did not settle and were transferred to compliance at the complainants' request. Fifteen cases were in ongoing dispute resolution processes, and 2 were in post-mediation monitoring. Of the 15 cases in the dispute resolution phase, 4 (27 percent) reached some form of interim agreement during the year. Five cases were closed following implementation of agreements.

Figure 7



Dispute Resolution Monitoring

The parties reached final agreement through dispute resolution in 2 cases this year, from Uzbekistan and Yemen, and CAO is monitoring implementation:

Manufacturing Central Asia & Türkiye

[Uzbekistan \(Indorama Kokand/Hamkor Bank-01\)](#)

A CAO mediation process in Uzbekistan between human rights monitors and two IFC clients - a textile producer, Indorama and a national bank, HamkorBank - is addressing a 2016 complaint about forced and child labor in the cotton sector. Hamkorbank and the complainants reached agreement in 2019 and that portion of the case was closed. The complainants and Indorama reached an interim agreement in 2020 that led to the complainants monitoring the 2020 and 2021 cotton harvests to ensure their concerns were resolved. CAO is monitoring a final agreement reached in August 2022, and the parties have agreed to continue addressing concerns about working conditions including by monitoring the 2022 and 2023 cotton harvests. The process, with the support of IFC and the government, has contributed to addressing forced and child labor issues in relation to the IFC projects.

Agribusiness Middle East

[Yemen \(HSA Foods-01\)](#)

CAO facilitated dialogue between an individual who raised pollution concerns related to a sugar refining plant, and HSA Foods, an IFC client. Dispute resolution began in November 2021, seven months after CAO received the complaint, with a final agreement reached in November 2022. The terms are confidential and CAO is currently monitoring implementation.



Cotton picker in Uzbekistan where CAO has facilitated a dispute resolution process to address forced and child labor. (Photo: CAO, 2023)

Dispute Resolution Cases Closed

After monitoring the implementation of agreements between the parties involved, CAO closed five cases this year:

Financial Markets Latin America & Caribbean

Brazil (Valor-01)

CAO concluded a dialogue process in Brazil after monitoring implementation of agreements. The process addressed a complaint filed to CAO in April 2021 from residents in São Paulo regarding a food delivery project supported by an IFC FI client. After the parties signed an agreement in February 2022, CAO monitored implementation and closed the case in October 2022.

Agribusiness Africa

Morocco (Zalagh Holdings-01)

Following the completion of community development projects including a school bus and construction of a water tower, CAO closed a case in Morocco in September 2022 after monitoring implementation of agreements reached in 2017 through dialogue. The process addressed a complaint regarding a poultry producer supported by IFC.

Education Africa

Kenya (Bridge International

Academies-02)

This case relates to IFC's investments in Bridge International Academies, Africa's largest chain of low-cost schools. The dispute resolution process responded to a February 2020 complaint from parents of a child enrolled at a Bridge school in Nairobi and the disputed circumstance related to the death of the child who was electrocuted by a live connection from an adjacent building to the school. After delays in the process due to the pandemic, the parties reached an agreement in June 2022, the terms of which are confidential. CAO closed the case in September 2022 after monitoring the implementation of agreement.

Case Highlight

Resolution of Farmers' Complaint Regarding Colombia's Third-Largest Dairy Company

This year CAO [closed a dispute resolution process](#) between local farmers and Alquería, whose dairy product operations include a joint venture with yogurt giant Danone.

In 2010, IFC provided Alquería with a \$15 million A loan and \$5 million in equity, primarily to expand production capacity across the company's plants. Three years later, the owners of Finca Golpe de Agua farm in Cajicá, Colombia, filed a complaint with CAO alleging that Alquería's adjacent dairy production facility was generating soil, water, air, and noise pollution.

The parties agreed to a dispute resolution process and, with CAO's support, reached a confidential agreement in June 2017 to address environmental impacts, including noise mitigation measures. Implementation of the agreement suffered from delays caused in part by COVID-19 restrictions and



social unrest in Colombia. Following a CAO site visit in 2021 to monitor progress, the parties renewed their commitment to move forward promptly with agreed actions. After the company subsequently confirmed in writing its commitment to fully implement the agreement, CAO officially closed the case in March 2023.

Our conclusion report on the case is available on CAO's website in [English](#) and [Spanish](#).



Case Highlight

Workers' Cooperative Established to Support Victims of Chronic Kidney Disease in Nicaragua

CAO's eight-year involvement in this [case](#) followed IFC's 2013 loan of \$15 million to its client Consorcio Naviero Nicaraguense (Navinic) to acquire land and expand production at a sugar mill in Montelimar, Nicaragua.

In 2015, the Asociacion Montelimar Bendicion de Dios (AMBED)—representing current and former Montelimar workers, their families, and local residents—filed a complaint with CAO about the high local prevalence of chronic kidney disease (CKD) and the company's response. Additional concerns included the environmental impacts of sugarcane cultivation, alleged evictions, and

a lack of corporate disclosure and community engagement.

In January 2017, through a CAO mediation process, the company and complainants signed an agreement to support the complainants. Agreed actions to provide health and livelihood support included setting up a cooperative for 172 former workers, which began operating a textiles factory in 2018.

In October 2019, a final mediation agreement committed the company to support former workers with short-term health and food benefits as well as medium-term income generating projects.

After the workers' cooperative reached financial sustainability, the parties agreed to set up a second cooperative whose remit will include a microcredit project.

CAO provided active support throughout the agreement monitoring period, which coincided with a political crisis in Nicaragua and the pandemic. For example, CAO equipped AMBED's leaders with smartphones and internet service and trained them to use videoconferencing apps.

The parties and CAO held a closing ceremony in January 2023. The case conclusion report is available in [English](#) and [Spanish](#) on our website.



CAO complainants and former workers of Ingenio Montelimar, a sugar mill in San Rafael del Sur, Nicaragua. (Photo: CAO, 2023)

Expanding Our Reach: Growing CAO's Network of Mediators

The need for experienced mediators to support community-company dispute resolution processes in the context of development projects is high and growing. As part of ongoing efforts to expand CAO's network of regional mediators, we hosted a workshop for practitioners in January 2023 in Côte d'Ivoire. Organized in collaboration with the IAMs of the African Development Bank and European Investment Bank, the event brought together 17 experienced mediators from across Francophone Africa. The goal was to build talent, brainstorm, and develop tactics and tools for effective dispute resolution between communities and private sector companies.

This year, 14 mediators from North and West Africa and 2 mediators from the Middle East were added to CAO's Mediator Network. More than 130 professionals are currently part of CAO's database of potential mediators, with experience ranging from commercial, family, and workplace mediation to banking disputes and community conflicts.



Mediators and representatives gather in Grand-Bassam, Côte d'Ivoire during a three-day Mediator Workshop. (Photo: CAO, 2023)

Enhancing Environmental & Social Performance

Compliance

Through our Compliance function, we review IFC/MIGA compliance with E&S policies, assess related harm, and recommend remedial actions where appropriate. Compliance reviews help identify gaps in policy implementation that may contribute to harm for project-affected people and provide an opportunity for remedy. The process fosters accountability for IFC's and MIGA's E&S commitments and learning to enhance their performance.



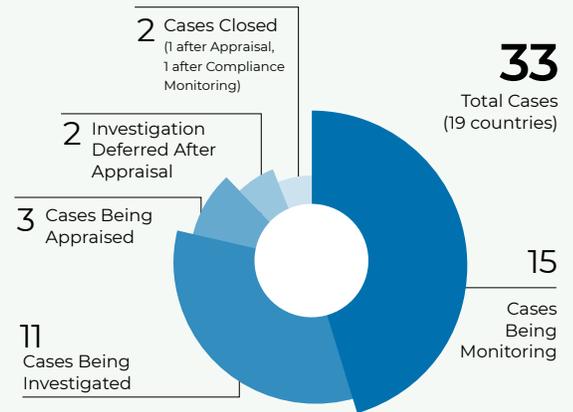
CAO team shares compliance investigation findings with Ngäbe community members in Bocas del Toro for a complaint in Panama. (Photo: CAO, 2023)

Cases in Compliance, FY2023

Compliance at CAO follows a three-step approach: first, we conduct a compliance appraisal to decide whether further investigation is warranted; second, we conduct a compliance investigation which results in findings and recommendations on any noncompliance and related harm; third, we monitor effective implementation of remedial actions in IFC/MIGA's Management Action Plan.

In FY23, our compliance caseload comprised 33 cases in 19 countries (Figure 8). Of these, 3 cases are in appraisal, 2 cases are deferred to IFC to attempt to resolve the issues prior to initiating an investigation (see p. 29), 11 are in investigation, 15 are in monitoring, and 2 cases have been closed.

Figure 8



Compliance Appraisals

This year, CAO completed appraisals for 4 cases. Of these, we closed 1 case from Pakistan because an investigation was not merited and initiated 3 new investigations: 2 in Cambodia and 1 in Indonesia. These cases are described below. In addition, we are conducting ongoing appraisals for a case in Kenya related to an oil and gas development ([Delonex Energy-01](#)), a case in Togo regarding a container terminal ([LCT-03](#)), and a case in Ukraine in the agribusiness sector ([MHP-01](#)).

Financial Markets Middle East

[Pakistan \(HBL-01\)](#)

CAO completed an appraisal regarding the unfair dismissal of a Social and Environmental Management Systems (SMES) employee of Habib Bank Limited (HBL), Pakistan's largest commercial bank and an IFC client. CAO did not find an investigation was merited because there were not preliminary indications of potential IFC noncompliance in relation to Performance Standard 2 requirements and the complainant's dismissal. As a result, CAO closed the case in June 2023.

Financial Markets East Asia & the Pacific

[Cambodia \(FI 01-03\)](#)

CAO initiated an investigation in response to three complaints involving an IFC investment in a financial intermediary (FI) linked to the Lower Se San Dam 2 project in Cambodia. The appraisal found preliminary indications of project-related harm in relation to living conditions, livelihoods, cultural sites, and safety. It also found potential IFC noncompliance with its E&S policies, particularly for pre-investment review and monitoring of E&S commitments contained in the legal agreement with the client.

Financial Markets East Asia & the Pacific

[Cambodia \(FI-04\)](#)

CAO concluded an appraisal regarding the practices of six FIs in Cambodia linked to IFC with a decision to initiate a compliance investigation. The case responds to a complaint from microfinance borrowers alleging harm due to predatory and deceptive lending practices, including loss of land, livelihood impacts, impacts on Indigenous peoples, child labor, and threats and reprisals.

Agribusiness East Asia & the Pacific

[Indonesia \(Wings-01\)](#)

CAO initiated an investigation in response to a complaint about an oil palm plantation in Indonesia linked to an IFC client via the supply chain. The client has already prepaid the loan to IFC. However, CAO concluded that, despite the exit, an investigation would provide an opportunity to support greater consistency and clarity in IFC's due diligence and supervision of client supply chain issues.

Deferrals

What is this new step in CAO's compliance process?

Under a new provision in the CAO Policy, in specific cases, CAO may decide to defer the decision to investigate to allow an opportunity for IFC/MIGA, the client, and complainant to resolve the issues directly. We make any decision to defer a case public in the case appraisal report, clearly explaining the criteria for the deferral, conditions agreed with IFC/MIGA, and a framework for monitoring and reporting on progress. The parties also agree to a timeline, typically no longer than six months, after which CAO determines whether the issues have been substantially addressed.

In deciding whether to defer a case, CAO considers the severity of alleged harm and potential compliance issues and whether they are clearly defined, limited in scope, and amenable to early resolution. We also look at whether IFC and/or MIGA management are making specific commitments commensurate to the complaint issues and consistent with policy

requirements. Complainants' views on the impact of a deferral, positive and negative, are also a key factor.

The first two cases to go through deferral are from India ([Shapoorji Pallonji-01](#)) and Jordan ([Daehan Wind Power Co-01](#)), both raising land-related issues. In FY23, CAO extended the six-month window by one year in both cases, at IFC's request, to allow time to implement agreed actions.

The deferral step is a good example of CAO Policy innovations to promote early resolution by IFC/MIGA and their clients. Experience to date tells us that more time may be needed. Extensions are allowed but will need to be balanced with the purpose of the deferral step, which is to resolve issues expeditiously. We are capturing learning from our early experience of deferrals to inform future practice.

Compliance Investigations

Compliance investigations are complex and typically take several years to complete. By the end of the fiscal year, we had finalized investigation reports for three cases that are now undergoing IFC Management Action Plan (MAP) development for IFC Board discussion. These investigations present our findings on complaints related to the Lonmin platinum mine in South Africa ([Lonmin-02](#)) and Alexandria Development cement plant in Egypt ([Alex Dev-02](#) and [03](#)).

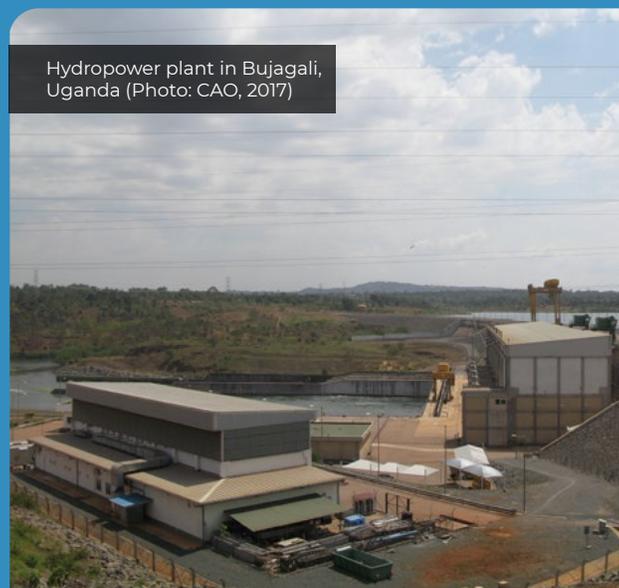
Overall, CAO is working on 11 compliance investigations across 4 regions, including Africa, East Asia and the Pacific, Europe, and the Middle East. The sectors and issues raised in these cases reflect the trends we see in our overall caseload. These include large infrastructure projects, agribusiness, and education projects, and IFC investments in financial intermediaries that are similarly exposed to sub-projects in the infrastructure, energy, and agribusiness sectors. The E&S issues raised include stakeholder engagement; labor and working conditions; pollution prevention; community health and safety; land; loss of livelihoods; and access to information.

Compliance Monitoring

During monitoring, CAO verifies that IFC/MIGA effectively implement the corrective actions laid out in a Board-approved MAP to address CAO's findings and recommendations. This step in our compliance approach is critical to achieving redress for complainants through remedial measures to address project-related harms.

Under CAO's former Operational Guidelines, we prepared monitoring reports for each case, a time-intensive process that that produced one report every two to three years. This year, we piloted our first [Omnibus Monitoring Report](#) to streamline the process and frequency of reporting. Highlights from this report, which includes the first five cases transferred from investigation to monitoring under the CAO Policy, are included on pages 29-31.

For some cases, we will continue to publish a stand-alone monitoring report. We issued one this year for the [Bujagali Hydropower Project](#) in Uganda (see box on this page).



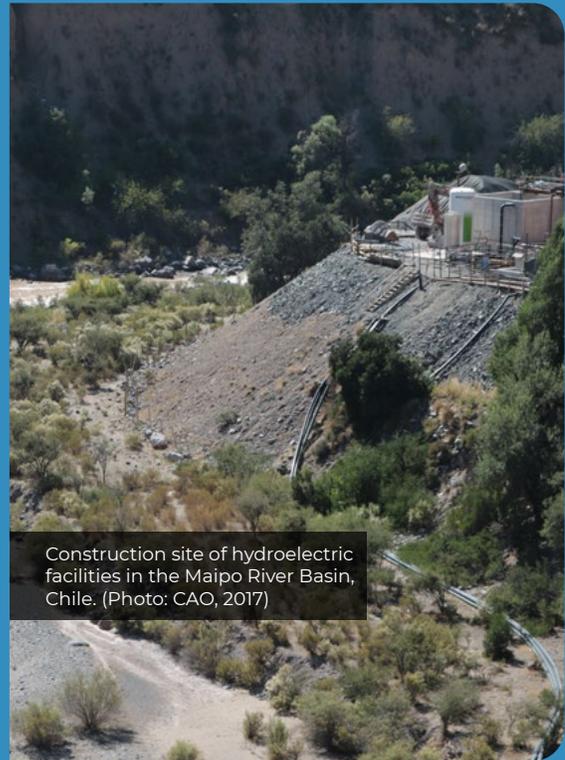
Uganda: Bujagali Hydropower Project

This year, CAO issued a third compliance monitoring report for the Bujagali Energy Project in Uganda. Both IFC and MIGA invested in the hydropower plant's development on the River Nile, including construction of a 100 kilometer (km) transmission line. CAO found IFC noncompliance during two investigations into complaints about workplace injuries, wages and benefits, and land compensation. IFC is initiating an advisory services program to support skills and capacity development for some workers injured during project construction. However, issues related to benefits owed and compensation for lost land and crops remain substantively unaddressed. For this reason, CAO is keeping the case open. Learn more about our Bujagali cases ([Bujagali-04](#), [06](#), [07](#), and [08](#)).

Omnibus Monitoring Report Highlights

Chile: Alto Maipo Hydroelectric Project

IFC exited this investment in 2018 and the power project was completed three years later. CAO closed project-level monitoring after IFC completed MAP actions focused on document disclosure and sharing the CAO report with project investors. However, CAO concluded that IFC's project-level commitments did not address or resolve most of CAO's noncompliance findings, and acknowledges complainants' frustration that the MAP did not address noncompliance findings of IFC oversight regarding E&S issues including water contamination risks, noise levels, and worker intimidation. CAO will consider this case in future advisory work on responsible exit. CAO decided to close its monitoring process in relation to IFC's four project-level actions, while also closing monitoring on four systemic-level actions after IFC published a Good Practice Note on Environmental, Health and Safety Approaches for Hydropower Projects. CAO is keeping three systemic actions open for monitoring related to gender-based violence guidance, stakeholder engagement for Cumulative Impact Assessments, and disclosure of E&S information.



Construction site of hydroelectric facilities in the Maipo River Basin, Chile. (Photo: CAO, 2017)

Cement manufacturing facility in Egypt. (Photo: CAO, 2015)



Egypt: Alexandria Development Cement Company

CAO found IFC noncompliance in relation to this client's air quality monitoring, grievance handling, community engagement, and labor practices. While IFC has substantially implemented the MAP actions, CAO found insufficient evidence during monitoring that these actions fully resolved the noncompliance issues. However, the lack of an active investment and formal ongoing supervision role by IFC has limited leverage to implement corrective actions with the client. CAO has therefore closed the case, rating the project-level actions as "partly unsatisfactory" because there is no reasonable expectation of further client action. CAO also decided to close its monitoring process in relation to IFC's systemic-level action, as they have updated the procedures for E&S risk management across all IFC investments from January 2022. CAO will consider the effectiveness of their implementation on a case-by-case basis in ongoing compliance cases.

Nigeria: Eleme Fertilizer Company

CAO is monitoring project-level actions in this labor case, which relates to a large fertilizer production plant in Port Harcourt, Nigeria, operated by Indorama Eleme Fertilizer & Chemicals Limited. To address CAO's findings, IFC appointed an independent consultant to review the client's implementation of Performance Standard 2 regarding fair treatment of workers and their ability to raise grievances without any retribution. The consultant made recommendations for the company to implement, and subsequently review the company's progress on IFC's behalf. CAO will continue to monitor this case.

Panama: PL-IV Transmission Line

CAO is monitoring project and systemic-level actions for this case, which raises concerns about free, prior, and informed consent (FPIC) surrounding construction of a 330 km transmission line by a public-private partnership for which IFC provided advisory services. IFC has completed some MAP actions as well as additional items approved by the IFC Board. CAO highlights that the state-owned electricity transmission company, ETESA, and its E&S consultant, have not reflected IFC's advice for designing the E&S impact assessment and the FPIC processes conducted for the project. Unless further steps are taken, the ESIA and FPIC processes will not meet IFC Performance Standards requirements. CAO will therefore continue to monitor all open project and system actions in this case.

Case Highlight

Monitoring IFC's First Management Action Plan for a Climate Change Case in the Philippines

In May 2023, CAO published monitoring results related to IFC's investments in [Rizal Commercial Banking Corporation \(RCBC\)](#), a financial intermediary (FI) in the Philippines. The report follows implementation of IFC's Management Action Plan (MAP) to address the findings of a CAO compliance investigation released in April 2022. The MAP is the first prepared by IFC, and monitored by CAO, under the CAO Policy.

IFC first invested in RCBC in 2011 to strengthen the financial sector in the Philippines in the wake of the global financial crisis. CAO's investigation reviewed how IFC applied its environmental and social requirements to its investments in RCBC and, in turn, how the bank applied these requirements to ten coal-fired power plants it financed in the Philippines, and one plant it committed to finance. The investigation responds to a complaint from communities living near the power plants supported by CSOs raising concerns about project-level impacts as well as climate change concerns.

In response to the investigation, IFC committed to strengthen implementation of RCBC's

Environmental and Social Management System (ESMS), address the impacts of the power plants, including their compliance with IFC's Performance Standards, address greenhouse gas (GHG) emissions related to the power plants and enhance RCBC's climate disclosures, and, more broadly, address opportunities for improving E&S risk management in IFC's FI portfolio.

In its monitoring report, CAO acknowledges significant efforts made by IFC to date to address the investigation findings. However, effective implementation of remedial actions at the project-level has been hampered by delays.

Systemic changes made by IFC since the investigation include publishing tipsheets for FI clients on assessing subproject greenhouse gas emissions and providing sample E&S covenants to be included loan agreements.

CAO will continue to monitor IFC's implementation of the action plan. IFC's next progress report is expected by the end of 2024. See CAO's [Omnibus Monitoring Report](#) for more details.

Reflections on Compliance Monitoring: Maximizing Opportunities for Remedial Solutions

After producing our first Omnibus report, we distilled reflections on our experience to date of MAP implementation and monitoring:

Engagement with Complainants

Complainants have been dissatisfied with the level of engagement during both the MAP and compliance monitoring processes. Concerns include: limited IFC engagement on MAP actions and limited effectiveness of these actions in providing remedial solutions to communities; delayed translations of IFC Progress Reports; time lags between CAO investigation reports and monitoring; and complainants' inability to comment on CAO monitoring reports.

Assessing Effective Implementation of Corrective Actions

CAO needs a more systematic approach to verifying effective implementation of MAP actions, including a standard methodology for gathering information, analysis, and rating IFC's response to each action item.

Process Efficiencies and Information

Improvement we identified include exploring opportunities to further streamline compliance monitoring processes in coordination with IFC, particularly in the areas of information gathering and validation.

Compliance Reporting Timelines

Monitoring is closely linked to the quality of CAO's findings and recommendations, the commitments made by IFC or MIGA, and the expectations of their Boards and complainants. CAO's experience suggests a need to review and maximize opportunities to facilitate remedial solutions, and speed up timelines, throughout the compliance process.

Identifying Opportunities for Remedy

Advisory

In its advisory role, CAO provides insights to improve IFC and MIGA's systemic performance on environmental and social sustainability. We draw on knowledge and lessons captured from our work to propose approaches that reduce the risk of harm to people and the environment. This year, CAO's advisory work focused mainly on remedy and responsible exit, topics that are gaining attention and traction across the development finance community.



Women in the village of Parawol prepare meals to receive CAO, CBG and local authorities for the boreholes' handover ceremony Sangaredi, Guinea. (Photo: CAO, 2023)

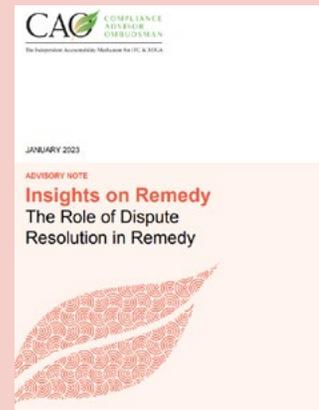
Advisory Highlights, FY23

Key outcomes from our advisory work over the past year include the publication of three new advisory notes that provided data, analysis, and recommendations on remedy and responsible exit to inform IFC, MIGA, and the broader development finance community on these critical topics. CAO also provided detailed recommendations to IFC/MIGA on their proposed draft Approach to Remedial Action during the public consultation phase, as well as on IFC's draft responsible exit principles. These reports are summarized in more detail below.

Advisory Notes on Remedy

CAO's new remedy series reviews a decade of case history to inform IFC/MIGA understanding of what has worked well in responding to complaints and the gaps to address to improve outcomes for communities.

CAO published the first advisory note in its Insights on Remedy series in January 2023. The [Role of Dispute Resolution in Remedy](#) draws from CAO's case experience and identifies opportunities for IFC and MIGA to better support remedial outcomes through CAO dispute resolution processes. Our analysis found that these processes play a meaningful role in remedy, both by delivering concrete outcomes and because the process can help restore complainants' dignity and increase trust between project-affected people and the companies concerned. Dispute resolution can also help prevent future harm, and participants express high levels of satisfaction with the process and outcomes. However, our analysis also highlights challenges. For example, companies can be reluctant to engage, resources to bring in external expertise may be lacking, and ongoing support may be needed to maintain the agreements reached.



In April 2023, CAO published a second advisory note on the [Remedy Gap: Lessons from CAO Compliance and Beyond](#). The report found that four out of five CAO investigation reports that resulted in noncompliance findings did not lead to satisfactory project-level actions to provide redress. The result is a 'remedy gap' whereby people filing a complaint to CAO about E&S issues often do not see their specific concerns addressed despite attempting dispute resolution or undergoing a lengthy compliance process. Instead, they are left to suffer harm and bear the unintended cost of development projects, even in cases where CAO has found IFC/MIGA noncompliance. These unintended costs can take many forms, including loss of livelihood, impacts to health, loss of cultural identity, and environmental damage. The advisory note provides recommendations to IFC and MIGA for bridging this gap (see table 1).

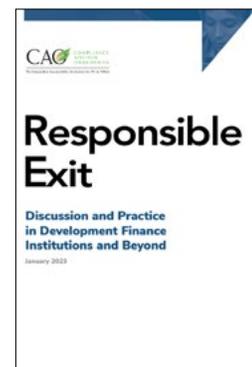
Addressing the Remedy Gap: Findings and Recommendations

Table 1

| Gap | Recommendation |
|---|--|
| <p>Affected people are often unaware of options for redress, including CAO. This represents an obstacle to remedy.</p> | <p>Affected people should be made aware of all grievance redress options, including CAO. When complainants reach out to the IFC or MIGA directly, they should be informed of their option to access CAO at any point in the process.</p> |
| <p>IFC/MIGA and their clients often miss critical opportunities for early resolution.</p> | <p>IFC/MIGA should take complainants' concerns seriously, respond proactively, and seek to understand the situation from multiple viewpoints.</p> |
| <p>IFC/MIGA and client reporting of, and responsiveness to, stakeholder grievances and serious incidents with E&S impacts are not sufficiently robust.</p> | <p>Reporting should be strengthened to enable proactive action where harm may have occurred.</p> |
| <p>Gaps in remedial action at the closure of CAO compliance processes often follow project exits.</p> | <p>IFC/MIGA should address E&S concerns before exiting a project.</p> |
| <p>Using leverage with clients to support E&S performance and enable remedy is a useful tool that is underused in IFC/MIGA contracts with clients.</p> | <p>IFC/MIGA should strengthen the planning and use of all forms of leverage and increase internal accountability for actions that may undermine their leverage.</p> |
| <p>Timebound and responsive IFC/MIGA MAPs are critical for achieving remedy for complainants through the CAO compliance process.</p> | <p>IFC/MIGA MAPs should respond to CAO compliance findings and recommendations, and they should be implemented in a timely fashion.</p> |
| <p>Meaningful engagement with complainants is also vitally important.</p> | <p>IFC/MIGA should develop guidance on how to engage with complainants during the remedy process.</p> |
| <p>Closing the remedy gap will sometimes require IFC/MIGA to assume responsibility for their contribution to project-related harm and to contribute to remedy.</p> | <p>IFC/MIGA should contribute to remedy where they have contributed to harm.</p> |
| <p>IFC/MIGA have a responsibility to communities who have brought their concerns to CAO and who are still awaiting remedy.</p> | <p>IFC/MIGA, in consultation with CAO and complainants, should conduct a review of CAO cases to identify any with a significant remedy gap, and propose measures to address them.</p> |

Responsible Exit

The need to adopt responsible exit strategies from investments that affect people and the environment is gaining importance among development finance institutions, institutional and impact investors, and CSOs. Investors also face questions about their post-divestment responsibility for projects where serious E&S issues remain. CAO published a landscape study entitled [Responsible Exit: Discussion and Practice in Development Finance Institutions and Beyond](#) in January 2023. The study used interviews with key actors, a roundtable discussion, survey, and literature reviews to analyze current responsible exit approaches. The report also provides a specific analysis of implications for IFC. Key elements of a responsible exit highlighted by the study are presented in table 2.



Informing IFC/MIGA's Approach to Remedial Action and Responsible Exit Principles

IFC and MIGA are the first DFIs to hold public consultations on a draft Approach to Remedial Action. During the public consultations on the draft approach in April 2023, we submitted [formal comments](#). This included recommendations that the proposed approach should be strengthened to incorporate concrete, time-bound, and measurable commitments to improve remedy, including establishing IFC's/MIGA's responsibility to contribute to remedy where they contribute to harm.

Table 2

Elements of Responsible Exit

- Responsible exit is planned for during due diligence, with investors building appropriate leverage and risk mitigation into the investment structuring, covenants, other terms, and conditions.
- Effective supervision of the project and monitoring of client grievance mechanism is undertaken to identify emerging risks.
- Existing leverage and new opportunities for leverage are identified and used toward enhanced E&S risk management.
- Capacity of the client is built to sustain good E&S performance.
- Stakeholder engagement identifies the views of project-affected people and latent risks, and informs decisions.
- A decision to exit is made considering E&S risks and sustaining good E&S performance.
- Adverse impacts are remediated.
- The client and project sustain sound E&S management after the investor has exited.

Financials and Funding

CAO Administrative Budget

CAO's administrative budget covers the costs of staff salaries, consultants, travel, communications, contractual services, and other administrative expenses. CAO's administrative budget is approved by the IFC and MIGA Board and includes contributions from IFC and MIGA. This year, CAO had an administrative budget of US\$8,995,168—a 30 percent increase over FY22. CAO executed 96.3 percent of its administrative budget—a 1 percent increase over FY22—and expended 100 percent of the Environmental and Social Contingency Fund. The budget increase received by CAO in FY23 was mainly to cover the cost of six additional staff positions approved by the World Bank's Board of Directors in FY22.

The following graphs show our budget, expense categories and budget execution trends over the past three years.

Figure 9

CAO Administrative Budget, FY21-FY23 in USD (\$)

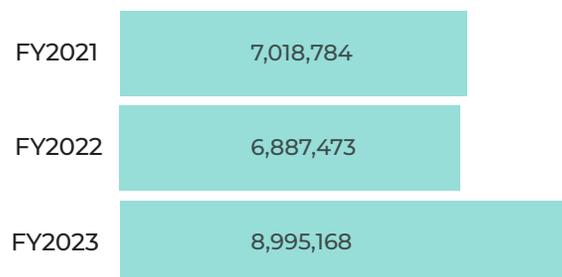


Figure 10

Budget Execution Trends, FY21 - FY23 (percentage)

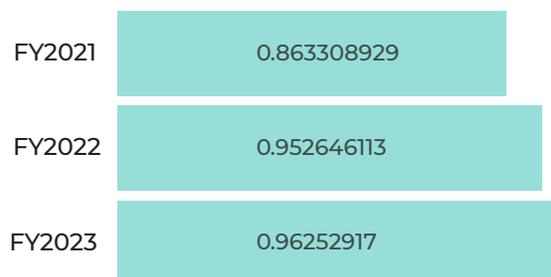
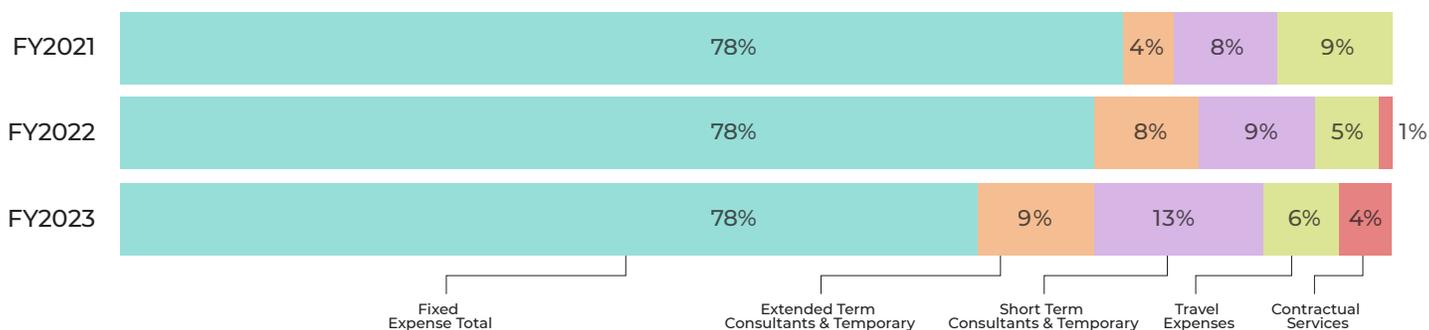


Figure 11

Expense Categories, FY21 - FY23



Our Team



The CAO team comprises 29 staff and 6 extended-term consultants, in addition to dozens of specialized consultants, experts, and mediators. CAO's workforce is regionally diverse, reflecting our workload, with the largest cohort from North America (26 percent), followed by Europe (21 percent), Asia (18 percent), South America (15 percent), Africa (9 percent), Central America and the Caribbean (8), and Oceania (3 percent).

The majority of the workforce (73 percent) are women, including CAO's Director-General.

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Connected