

## **CAO ASSESSMENT AND CONCLUSION REPORT**

### **Regarding a Complaint Received in Relation to a Transmission Line in the Republic of Cameroon**

August 2024

Office of the Compliance Advisor Ombudsman  
*for*  
the International Finance Corporation and the  
Multilateral Investment Guarantee Agency  
[www.cao-ombudsman.org](http://www.cao-ombudsman.org)

## **About the Compliance Advisor Ombudsman (CAO)**

The Office of the Compliance Advisor Ombudsman (CAO) is the independent accountability mechanism of the International Finance Corporation (IFC) and Multilateral Investment Guarantee Agency (MIGA), members of the World Bank Group. We work to facilitate the resolution of complaints from people affected by IFC and MIGA projects in a fair, objective, and constructive manner, enhance environmental and social project outcomes, and foster public accountability and learning at IFC and MIGA.

CAO reports directly to the IFC and MIGA Boards of Executive Directors. For more information, see [www.cao-ombudsman.org](http://www.cao-ombudsman.org)

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## ACRONYMS

CAO	Office of the Compliance Advisor Ombudsman
IFC	International Finance Corporation
MIGA	Multilateral Investment Guarantee Agency

OVERVIEW

In January 2024, a complaint was lodged with CAO by a resident of a village (the “Complainant”) near the city of Ntui, in Cameroon on behalf of 15 villagers. The complainant claimed that there are plans to construct a transmission line in proximity to his village which will acquire the land of villagers and affect the livelihood of cocoa farmers who depend on their land.

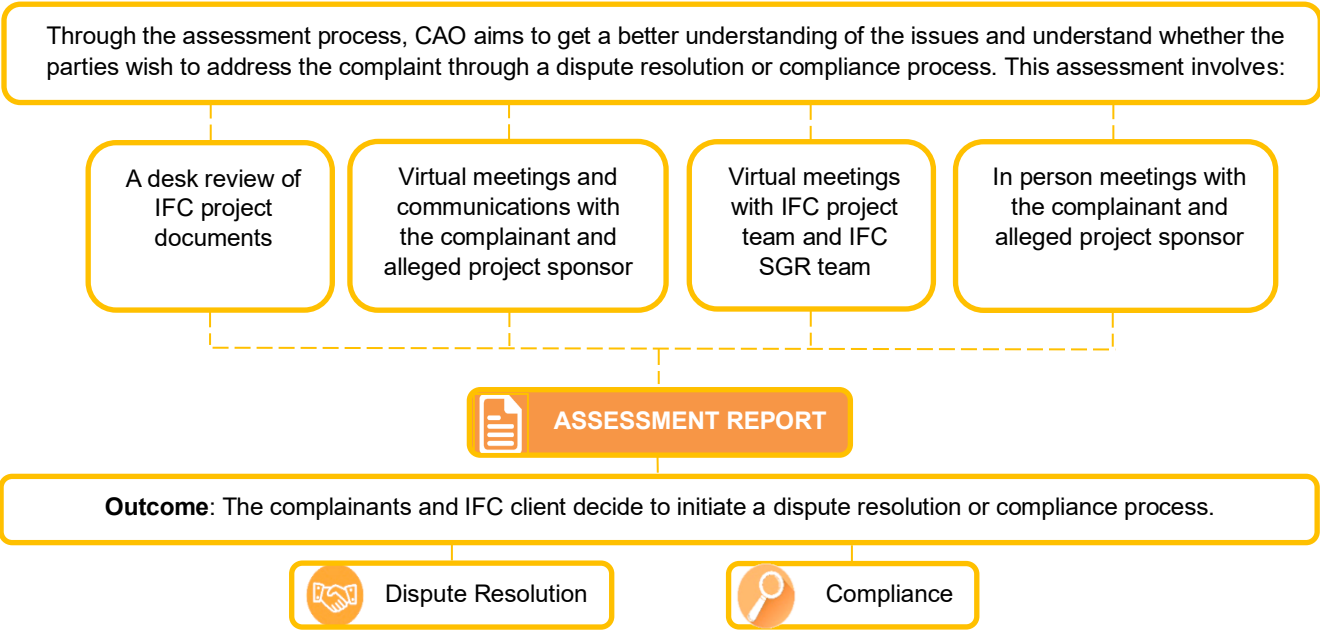
In February 2024, CAO found that the complaint met its eligibility criteria and began its assessment process. After an in-depth analysis during the assessment period, it was found that the planned transmission line does not relate to an active IFC/MIGA project<sup>1</sup>. Consequently, CAO is closing the case as it no longer falls under CAO’s mandate<sup>2</sup>.

ASSESSMENT SUMMARY

3.1 Methodology

Figure 1 shows the approach and methodology to be applied in CAO’s assessment process.

Figure 1. CAO Assessment Process



The CAO assessment process does not entail a judgement on the merits of the complaint; rather, it seeks to understand the facts and empower those involved to make informed decisions on how to address the issues raised. The issues raised in the complaint and during assessment by the complainants and IFC’s client are described below.

<sup>1</sup> CAO policy defines ‘Active Project’ as a project approved by the Board for which the IFC/MIGA Exit has not yet occurred.  
<sup>2</sup> CAO policy 37: “CAO will deem the complaint eligible if: (a) The complaint relates to an Active Project;”

## ASSESSMENT CONCLUSION

During the assessment period, a thorough review conducted by the CAO team found additional information regarding the financing of the concerned transmission line. It was determined that the transmission line is being constructed by an entity not financed/supported by IFC/MIGA and IFC/MIGA's client has no authority or responsibility over it. Furthermore, a detailed analysis concluded that the transmission line does not qualify as an associated facility as defined by the IFC/MIGA performance standard<sup>3</sup>. Given these findings, and since the transmission line is not related to an IFC/MIGA project, CAO is closing the case as it does not fall under its mandate.

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<sup>3</sup> IFC/MIGA Performance Standard 1, paragraph 8: "Associated facilities, which are facilities that are not funded as part of the project and that would not have been constructed or expanded if the project did not exist and without which the project would not be viable".

## APPENDIX A. CAO COMPLAINT-HANDLING PROCESS

Once CAO declares a complaint eligible, an initial assessment is carried out by CAO Dispute Resolution specialists. The purpose of CAO's assessment is to: (1) clarify the issues and concerns raised by the complainant(s); (2) gather information on how other stakeholders see the situation; (3) help stakeholders understand the recourse options available to them and determine whether they would like to pursue a collaborative solution through CAO's Dispute Resolution function or whether the case should be reviewed by CAO's Compliance function.

As per the IFC/MIGA Independent Accountability Mechanism (CAO) Policy,<sup>4</sup> the following steps are typically followed in response to a complaint that is received:

Step 1: **Acknowledgment** of receipt of the complaint.

Step 2: **Eligibility:** Determination of the complaint's eligibility for assessment under the mandate of CAO (no more than 15 business days).

Step 3: **Assessment:** Assessing the issues and providing support to stakeholders in understanding and determining whether they would like to pursue a consensual solution through a collaborative process convened by CAO's Dispute Resolution function or whether the case should be handled by CAO's Compliance function to review IFC's/MIGA's environmental and social due diligence. The assessment time can take up to a maximum of 90 business days, with the possibility of extension for a maximum of 30 additional business days if after the 90-business day period (1) the parties confirm that resolution of the complaint is likely; or (2) either party expresses interest in dispute resolution, and there is potential that the other party will agree.

Step 4: **Facilitating settlement:** If the parties choose to pursue a collaborative process, CAO's Dispute Resolution function is initiated. The dispute resolution process is typically based on or initiated by a Memorandum of Understanding and/or mutually agreed-upon ground rules between the parties. It may involve facilitation/mediation, joint fact finding, or other agreed resolution approaches leading to a settlement agreement or other mutually agreed and appropriate goals. The major objective of these types of problem-solving approaches will be to address the issues raised in the complaint, and any other significant issues relevant to the complaint that were identified during the assessment or the dispute resolution process, in a way that is acceptable to the parties affected.<sup>5</sup>

OR

**Compliance Appraisal/Investigation:** If the parties opt for an investigative process, the complaint is transferred to CAO's Compliance function. The complaint is also transferred to the Compliance function when a dispute resolution process results in partial or no agreement. At least one complainant must provide explicit consent for the transfer unless CAO is aware of concerns about threats and reprisals. CAO's Compliance function reviews IFC/MIGA's compliance with environmental and social policies, assesses related harm, and recommends remedial actions where

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<sup>4</sup> For more details on the role and work of CAO, please refer to the IFC/MIGA Independent Accountability Mechanism (CAO) Policy: <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/889191625065397617/ifc-miga-independent-accountability-mechanism-cao-policy>

<sup>5</sup> Where stakeholders are unable to resolve the issues through a collaborative process within an agreed time frame, CAO Dispute Resolution will first seek to assist the stakeholders in breaking through impasse(s). If this is not possible, the Dispute Resolution team will inform the stakeholders, including IFC/MIGA staff, the President and Board of the World Bank Group, and the public, that CAO Dispute Resolution has concluded the dispute resolution process and transferred it to CAO Compliance for appraisal.

appropriate following a three-step process. First, a compliance appraisal determines whether further investigation is warranted. The appraisal can take up to 45 business days, with the possibility of extending by 20 business days in exceptional circumstances. Second, if an investigation is warranted, the appraisal is followed by an in-depth compliance investigation of IFC/MIGA's performance. An investigation report will be made public, along with IFC/MIGA's response and an action plan to remediate findings of noncompliance and related harm. Third, in cases where noncompliance and related harm are found, CAO will monitor the effective implementation of the action plan.

Step 5: **Monitoring and Follow-up**

Step 6: **Conclusion/Case Closure**