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### Glass Half-Full or Glass Half-Empty? Thirty Years of Accountability at the Inspection Panel—The Impact of its Work and What the Data Tells Us

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**Glass Half-Full or Glass Half-Empty?**  
*Thirty Years of Accountability at the Inspection Panel– The Impact of its Work and What the Data Tells Us*

**Ramanie Kunanayagam et al<sup>1</sup>**

“A stroke of a genius”<sup>2</sup>, “a bold experiment in transparency and accountability that has worked to the benefit of all concerned”<sup>3</sup>, “a precedent under international law”<sup>4</sup>, and a “citizen-based accountability mechanism”<sup>5</sup> are some of the ways in which close observers have described the World Bank Inspection Panel, which celebrated its thirtieth anniversary in 2023.

The Inspection Panel’s creation in 1993 was a milestone in the field of international development. It was the first independent, citizen-driven accountability mechanism at a multilateral development bank. The Inspection Panel fulfills an access-to-justice role by being accessible to persons who are negatively affected by World Bank-financed projects to request an investigation to be heard and seek recourse for actual or potential environmental and social harm. The Panel brings the voices of communities, often marginalized, to the highest levels of governance of the World Bank and therefore provides a conduit for the poorest to be heard by the Executive Directors of the Bank.<sup>6</sup>

Over the years, the Inspection Panel has inspired the establishment of more than two dozen similar accountability mechanisms at multilateral development organizations and bilateral development agencies globally. Many of its practices – such as transparency, predictability of the process, protection of the confidentiality of requesters taking other precautionary measures to protect Requesters, developing policies and processes against intimidation and reprisals, and sharing lessons from its cases – have become standard among independent accountability mechanisms.

The Inspection Panel has a dual objective, (i) functioning as a redress mechanism for those affected by World Bank-financed operations; and (ii) holding the World Bank accountable to its own policies through its independent, fact-finding compliance investigations. The Panel’s work has brought transparency to the projects it has investigated, and has generated lessons that have helped influence

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<sup>1</sup> The authors include current panel member and staff of the World Bank inspection Panel: Ramanie Kunanayagam, – Chairperson, World Bank Inspection Panel; Mark Goldsmith, – Panel Member, World Bank Inspection Panel; Ibrahim James Pam, – Panel Member, World Bank Inspection Panel; Serge Selwan, – Senior Operations Officer and Adviser, World Bank Inspection Panel; Richard Wyness, – Senior Environment Specialist, World Bank Inspection Panel; Ayako Kubodera, – Investigation Officer, World Bank Inspection Panel; Camila Jorge do Amarel, – Investigation Officer, World Bank Inspection Panel; Rupes Dalai – Research Analyst, World Bank Inspection Panel.

<sup>2</sup> Werner Kiene, “An Introduction from the Panel Chair,” in *Accountability at the World Bank: The Inspection Panel at 15 years*, Inspection Panel (Washington, DC: International Bank for Reconstruction and Development, 2009), p. ix-xiv.

<sup>3</sup> James Wolfensohn, “Foreword,” in *The World Bank Inspection Panel: The First Four Years (1994-1998)*, ed. Alvaro Umaña (Washington, DC: International Bank for Reconstruction and Development, 1998), p. vii-viii.

<sup>4</sup> Susan Park, *The Good Hegemon - US Power, Accountability as Justice, and the Multilateral Development Banks* (New York: Oxford University Press, 2022).

<sup>5</sup> *Accountability at the World Bank: The Inspection Panel at 15 years*, Inspection Panel (Washington, DC: International Bank for Reconstruction and Development, 2009), p. 3 (quoting David Hunter).

<sup>6</sup> Since September 2020, the Inspection Panel has been housed within the World Bank Accountability Mechanism which was created in September 2020.

the adoption of policies and guidelines that have strengthened the World Bank's assessment of environmental and social risks, and the mitigation of related impacts.

This essay reflects both quantitatively and qualitatively on the Panel's work during its first thirty years. It includes the number, origin and types of cases it has received, identifies emerging trends among them, and examines the impact of the Panel's work within its mandate, while also considering the limitations of the Panel.

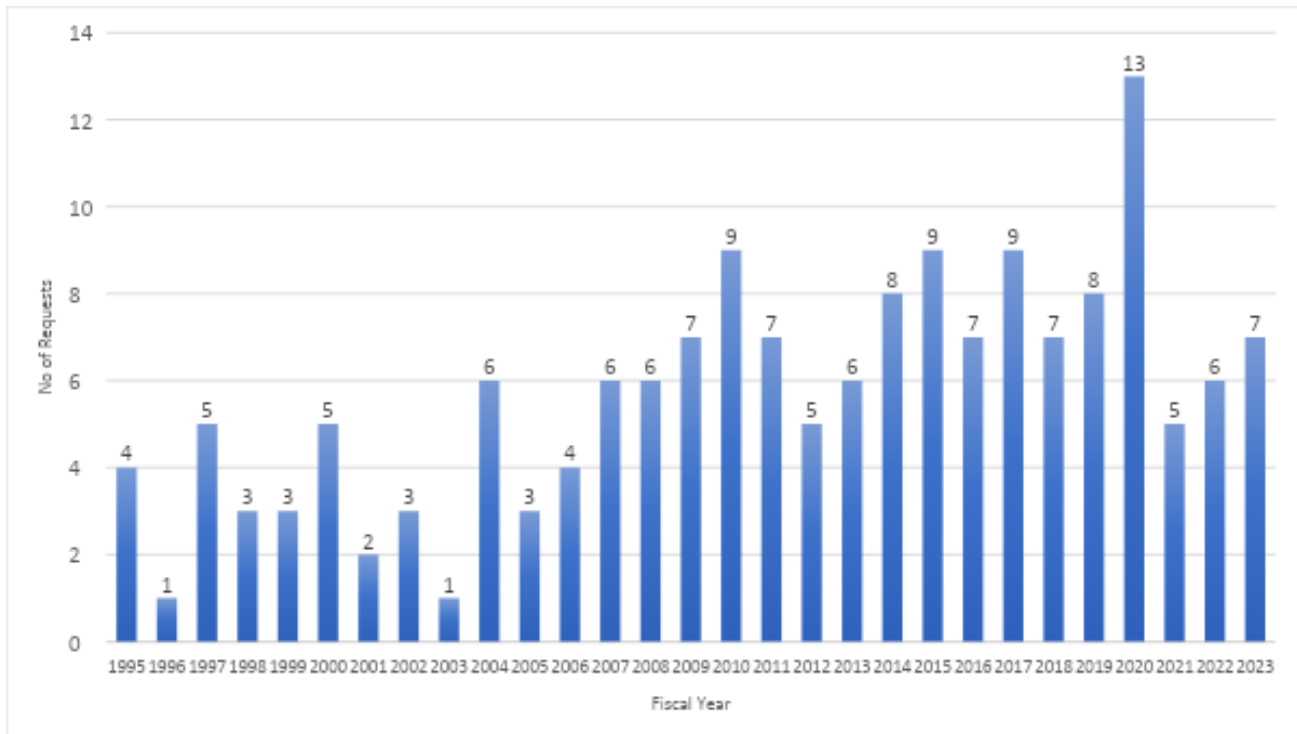
### *Case Levels have Remained Constant*

The Inspection Panel assesses the admissibility of the requests it receives based on criteria defined in its legal framework. The admission criteria are: (i) the affected party consists of any two or more persons (the 'requesters') who are affected by a Bank-supported project; (ii) the request is not frivolous, absurd or anonymous; (iii) the project that is the subject of the request and the alleged harm claimed by the requesters can be plausibly linked to a World Bank-funded project; (iv) less than 95 percent of the loan has been disbursed or, for projects approved on or after September 8, 2020, fifteen months have not passed since the project closed; (v) the subject matter of the request does not concern issues of procurement; and (vi) the request is not the same as a previous one, unless there is new evidence or circumstances. Complaints regarding procurement or corruption are reviewed by other specialized offices of the World Bank.

An important additional criterion is that the request's subject matter must have been known to the World Bank Management, allowing it a reasonable opportunity to address the concerns before approaching the Inspection Panel. In that sense, the Panel is often the last opportunity for recourse for requesters, when previous attempts to resolve their concerns with the Bank have not resulted in positive outcomes.

The Inspection Panel's caseload is driven by the requests that it receives. The actual number and types of cases varies from year to year (see Figure 1).

**Figure 1 – Cases Receipt (Fiscal Years) – June 30, 2023<sup>7</sup>**



The average number of cases per year has been increasing slightly in recent years. Over the 30 years of the Panel’s existence, the Panel has registered an average of 4.03 cases per year; in the last five years, it has registered 5.6 cases per year (see Table 1).

**Table 1 – Inspection Panel Cases – Registrations – June 30, 2023**

5 Year FYs	Cases Received	Registered	Registration Percentage	Annual Average
1994-1998	13	11	85%	2.2
1999-2003	14	13	93%	2.6
2004-2008	25	22	88%	4.4
2009-2013	34	29	85%	5.8
2014-2018	40	18	45%	3.6
2019-2023	39	27	72%	5.6
<b>Total</b>	<b>165</b>	<b>120</b>	<b>73%</b>	<b>4.03</b>

The geographic distribution of cases has been diverse; over the past 30 years, the Inspection Panel has received 165 admissible requests from 57 countries (see Map below). Note that fewer cases from a particular region do not necessarily correlate to fewer issues in that region. Conversely, once requests are registered from a certain country or region, they are often followed by others.

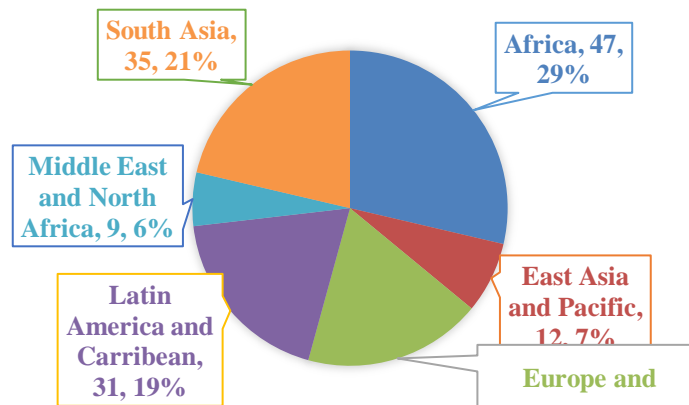
<sup>7</sup> Out of the thirteen requests received in 2020, nine requests pertained to the same case – the Odra-Vistula Flood Management Project, in Poland.

## Map – Geographical Distribution of Requests for Inspection – June 30, 2023



Admissible requests are those requests that meet the criteria for admission identified earlier. Civil society and academic critics of the Inspection Panel argue that the mechanism’s remit for admission is too narrow. They express concern that the Inspection Panel cannot initiate cases on its own, that the Panel needs to establish the plausibility of a link between harm and Bank-supported project, and that there is a pre-condition for the requesters to ensure that Management is made aware of the concerns and has a reasonable opportunity to address these concerns. However, the Inspection Panel cannot unilaterally expand its remit for admission of cases. Only the World Bank Board of Directors has the power to make such a change. (See Figure 2 below).

**Figure 2 – Case Registration by Region – June 30, 2023**



Shrinking civil society space, lack of information and transparency on project financing, lack of information about the existence of the Panel, fear of intimidation and reprisals, and claims that

requesters are undermining progress or working against national interest are all factors that influence why affected persons may be deterred from submitting a request for inspection. When Requesters fear reprisals and/or intimidation, they can request that their identities be kept confidential by the Inspection Panel.

On average, as noted, the Inspection Panel registered 4.03 cases per year over its 30 years of existence; it recommended an investigation in 1.6 requests per year. . The number of investigations conducted has remained relatively constant over time. Interestingly, the number of investigations did not decline during the peak years of the Covid-19 pandemic, despite widely imposed lockdowns and social distancing measures that curtailed the ability of people to mobilize (see Table 2 below).

**Table 2 – Investigations Recommended – June 30, 2023**

<b>5 Year FYs</b>	<b>Cases Received</b>	<b>Investigation Recommended</b>	<b>Recommendation Percentage</b>	<b>Annual Average</b>
1994-1998	13	6	46%	1.2
1999-2003	14	8	57%	1.6
2004-2008	25	12	48%	2.4
2009-2013	34	9	26%	1.8
2014-2018	40	6	15%	1.2
2019-2023	39	8	21%	1.6
<b>Total</b>	<b>165</b>	<b>49</b>	<b>30%</b>	<b>1.6</b>

The number of projects that reach the Inspection Panel represent a very small fraction of the number of projects that the World Bank finances each year. Since the Inspection Panel was established, the number of requests received has been equivalent to only about 1.5 percent of the total number of World Bank-financed projects over the same period. Investigations by the Inspection Panel represent less than 0.5 percent of approved World Bank-financed projects.

While the Panel has received requests during the early stages of project design, a large majority of requests are received well after Project approval. This may explain why, although the World Bank’s Environmental and Social Framework (ESF) reached its five-year milestone in October this year, the Panel has still to register a single case on a project that was approved during the applicability of the new ESF approach.

As shown in Table 3 below, the Inspection Panel has conducted 41 investigations, corresponding to 34 percent of the registered requests. During the five years between FY 2019 and FY 2023, the Inspection Panel recommended an investigation for 30 percent of its registered requests (8 out of 27). This is in line with the trend over the past fifteen years. However, the introduction of the dispute resolution option as part of the Bank’s Accountability Mechanism has meant that three of the investigations that were recommended to the Board have not been undertaken as a result of being taken up by dispute resolution, which came to operation in 2021.

**Table 3 – Registered Cases and Investigations Conducted – June 30, 2023**

5 Year FYs	Cases Registered	Investigation Recommended (Percentage of Registration)	Investigation Conducted (Percentage of Registration)	Annual Average of Investigation Recommended	Annual Average of Investigations Conducted
1994-1998	11	6 (55%)	2 (18%) *	1.2	0.4
1999-2003	13	8 (62%)	8 (62%)	1.6	1.6
2004-2008	22	12 (55%)	12 (55%)	2.4	2.4
2009-2013	29	9 (31%)	8 (28%) #	1.8	1.6
2014-2018	18	6 (33%)	6 (33%)	1.4	1.2
2019-2023	27	8 (30%)	5 (19%) &	1.6	1
<b>Total</b>	<b>120</b>	<b>49 (41%)</b>	<b>41 (34%)</b>	<b>1.7</b>	<b>1.37</b>

\* Prior to the 1999 clarification of the Panel’s resolution the Board did not have a set of technical criteria to decide on the approval of investigation. This was introduced in the 1999 clarification, which was later incorporated in the 2020 resolution. Hence, between 1994 and the 1999 clarification, four of the Panel’s recommendations for investigations were not approved.

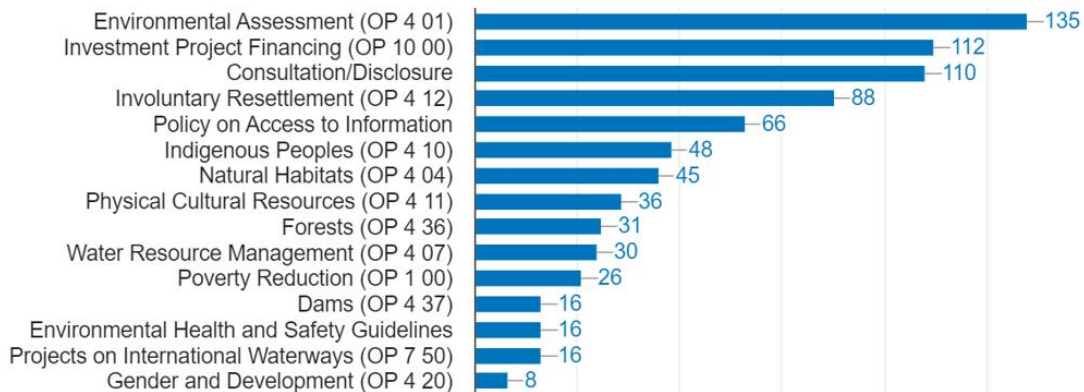
# The Board did not approve the Panel’s investigation recommendation in the case of the Lebanon – Greater Beirut Water Supply Project.

& Since September 8, 2020, the Board required that a dispute resolution process be offered to parties following the Board’s approval of the Panel’s investigation. In five out of the eight cases, the parties opted for the Panel to conduct an investigation; and in three cases the parties opted for the dispute resolution service.

*Rising Trends*

As shown in Figure 3, below, environmental assessment and consultation have been two of the three most common policy issues cited in requests that have been received by the Inspection Panel since it was created. Environmental assessment has been cited in 135 requests and consultation or disclosure in 112 (see Figure 3 below).

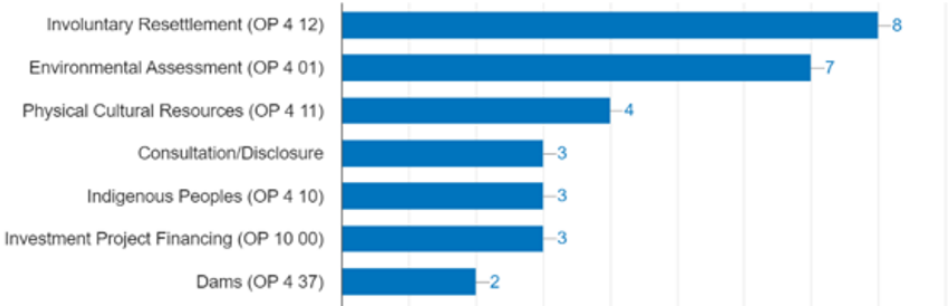
**Figure 3 – Major Policy Issues Raised in Requests – June 30, 2023**





Since the beginning of 2022, involuntary resettlement issues and livelihood restoration became the most prominent aspect raised in requests. While this appears indicative of a rise in the number of cases received, with resettlement issues at the core of the complaint (and indeed resettlement has consistently remained in the top four of the issues raised throughout the history of Panel cases), drawing any conclusions about trends on issues raised is difficult, given the small number of requests received within less than two years (see Figure 4 below).

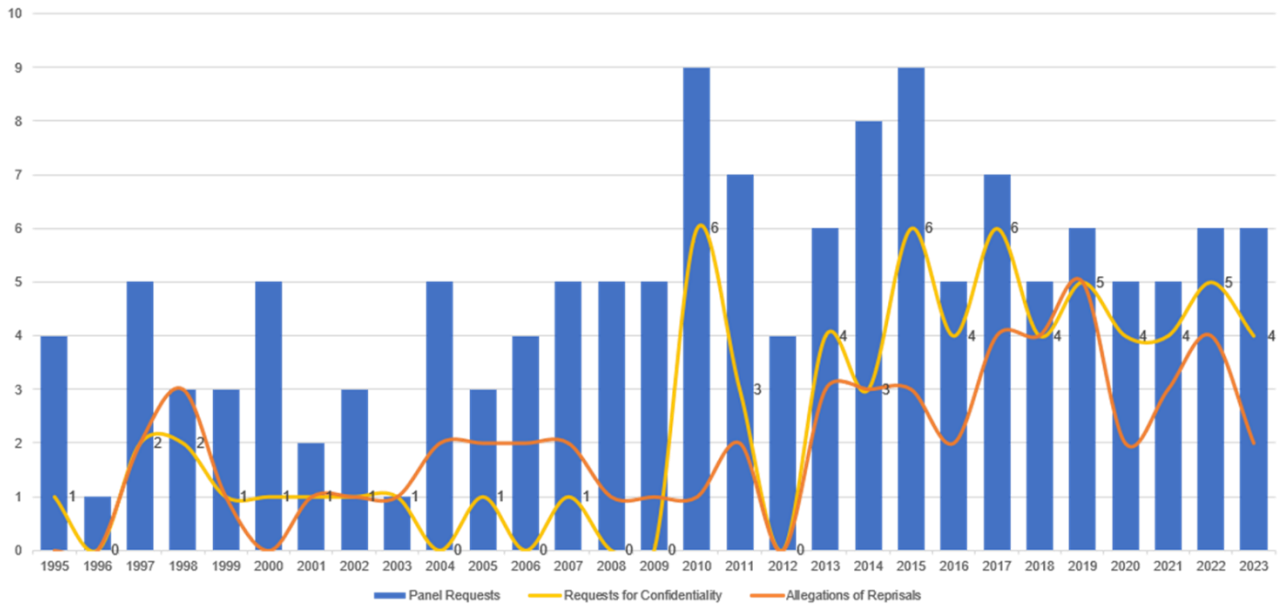
**Figure 4 – Major Policy Issues Raised in Requests – Fiscal year 2022-2023**



An issue of growing concern for the Inspection Panel is the upward trend in reports on intimidation and reprisals, and requests for confidentiality due to a fear of retaliation. This can be seen in Figure 5 below. In 13 out of the 16 projects connected with requests for inspection between FY 2021 and FY 2023, 81 percent of requesters asked for confidentiality. In half of the related projects, there were allegations of intimidation and reprisals.

The Inspection Panel is the first international accountability mechanism to issue guidelines for reducing retaliation risks to community members during the investigation process and to take a zero-tolerance approach to intimidation and reprisals. Despite this, there are unfortunately limitations as to what the Panel can practically do when Requesters face actual retaliation. In 2021, The Panel issued an advisory report, [\*Right to be Heard: Intimidation and Reprisals in World Bank Inspection Panel Complaints\*](#) to raise awareness of the subject.

**Figure 5 – Inspection Panel Cases – Record on Confidentiality and Reprisals – June 30, 2023**



*The Panel – A Force for Positive Outcomes?*

Throughout its history, the Inspection Panel has simultaneously been revered and questioned on the impact of its work. Inspection Panel investigations carry weight and strength that arguably few other mechanisms can match. Inspection Panel investigations, and sometimes even eligibility reports, have alerted the World Bank to harm or potential harm to the environment and project-affected persons, instances of policy non-compliance, and other important issues that had otherwise been overlooked.

The Panel uses several indicators to measure positive outcomes from its investigations:

1. **Redress of harm** to affected people through Management and Borrower actions designed to address or mitigate a project’s adverse impact.
2. **Identifying systemic issues** within the institution, leading to the Bank
  - Providing policy clarifications and improved guidance to staff
  - Strengthening of environmental and social safeguard capacity
3. **Lessons and improvements in future Bank operations**  
Review of broader issues, such as on labor influx risks and gender-based violence.
4. **Advisories – Emerging Lessons Series**  
The Panel provides advisory reports in the form of lessons from its cases. These publications include topics, such as on environmental assessment, Indigenous Peoples, involuntary resettlement, biodiversity offsets, gender-based violence, land, and a forthcoming advisory on livelihoods etc.

*Project-level Outcomes - Redress of Harm*

At the conclusion of a Panel investigation, Management develops an action plan in response to the investigation findings. This action plan is consulted upon with the requesters, agreed to by the government of the borrowing country, and approved by the World Bank Board of Directors. The action

plan is intended to provide remedies to the harms, and to bring the project into compliance with World Bank policies. Bank Management provides regular updates to the Board on the progress in the implementation of each action plan, usually on a yearly basis, and these progress reports are published on the Panel's website. Since April 2016, Bank Management has submitted a biannual consolidated report on the implementation of ongoing action plans to the Board of Directors. The Inspection Panel also publishes these reports on its website. Investigation outcomes at the project level have included improvements in resettlement plan design and compensation, the creation of project-level grievance mechanisms, improved information disclosure, and strengthened project supervision.

For example, in an [investigation](#) completed this year in Togo, on a climate resilience project that aims to strengthen coastal resilience against severe coastal erosion, the Panel found that the Project proponents did not adequately identify the potential environmental risks and socioeconomic impacts of the project's physical interventions on local fishing communities, especially those fishers and *mareyeuses*<sup>8</sup> practicing traditional beach seine fishing.<sup>9</sup> In response to this finding, in their action plan, Management stated that the Project earmarked \$6 million for community activities, including the provision of livelihood support, which will specifically include and target the individuals and groups involved in this fishing activity.

In the Democratic Republic of Congo (DRC) – [Transitional Support for Economic Recovery Credit investigation](#), the Inspection Panel investigated and found that there was a failure during project design to carry out the necessary initial screening to identify risks and trigger the safeguard policies so that crucial steps would be taken to address the rights and needs of the Pygmy Indigenous Peoples. The management action plan approved by the Board emphasized staying engaged in the DRC forest sector, continuing to monitor a moratorium on future logging concessions, and strengthening the enforcement of the implementation of the government forest code. The management action plan was aimed at integrating forest-dependent communities – the Pygmies – more widely into the Bank's activities in DRC and support critical activities such as capacity building, recognition of customary rights, law enforcement, and independent monitoring in forthcoming forest-related operations. A “Framework for a National Development Strategy for Pygmy Communities in DRC” was developed by the Bank with the government and development partners, and after consultation with key stakeholders, including the Requesters. The Framework was developed to cover the analysis of factors which threaten the cultural identity of Pygmy populations and contribute to their impoverishment, and the development of a set of proposed actions to mitigate these factors.

In another project, the [Uzbekistan – Rural Enterprise Support Project \(Phase II\)](#), based on the Panel's eligibility report, Management outlined several actions responding to the request for an investigation. In particular, it ensured the revision of the Rural Enterprise Investment Guidelines to include provisions that require the beneficiaries of loans to comply with national labor legislation as well as international laws on forced and child labor in the cotton sector. The Bank continued to maintain an intensive dialogue with the government of Uzbekistan on issues related to child and forced labor in

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<sup>8</sup> *Mareyeuses* are wholesale traders, typically women, also known as fish transformers. They buy and prepare fish, crustaceans, and shellfish for resale. They play an important role in the distribution and transformation of fishery products.

<sup>9</sup> In Togo, beach seine fishing is a land-based fishery, where men, women, and children haul a long fishing net. The nets are two-to-five-kilometer-long; one end is roped to a stick and the other end is taken by a pirogue towards the other side of the beach. The hauling of the net lasts several hours.

the cotton sector; the government also engaged in a public campaign about the rights of children and adults, and established a national monitoring plan for the eradication of child and forced labor.

### *Institutional Outcomes - Systemic Learning and Improvement*

Inspection Panel investigations have also led to various commitments by Bank Management with institution-wide implications. In some instances, investigations have encouraged better institutional approaches to environmental and social performance, with improved identification of affected people, protection of livelihoods, and biodiversity outcomes.

For example, Inspection Panel investigations on land administration and management projects, such as [Albania Integrated Coastal Zone Management and Clean-Up Project](#), revealed the existence of a policy gap in the application of the World Bank's Policy on Involuntary Resettlement in the context of land-management projects. Acknowledging the lack of clarity in the application of the Policy to land-use planning projects, the Bank issued two guidance documents for staff. The first was to clarify the policy application regarding land-use planning projects; the second was an interim guidance concerning the identification and management of risks intrinsic to land use planning projects.

In investigations on two projects ([Uganda – Private Power Generation Project \(Bujagali\)](#) and [Ghana – Second Urban Environment Sanitation Project](#)), the Panel identified that the time lag between data collection and project implementation meant project implementation was based on out-of-date information, and not modified to consider changing conditions. As a result of these investigations, the Bank prepared interim guidelines to provide guidance to staff on addressing legacy issues. These guidance notes pertain to how the Bank re-engages in a project that has been for some time, or when there is a long gap between the collection of data and implementation.

Another recent example includes guidance provided to staff on challenges caused by the influx of project-labor in World Bank-financed projects. This has led to the Bank developing good practice notes that have been published on assessing and managing the risks and impacts of using security personnel, and a Gender-Based Violence (GBV) task force has been established to provide recommendations for the institution on how to prevent and respond to GBV in Bank projects. . The Bank also generated a report on lessons learned and actions to address internal systemic issues. In addition, the Bank now requires the personnel of large contractors to sign a code of conduct that explicitly details the prohibition of, and penalties for, any sexual relations with minors, and has become the first international financial institution to disqualify contractors for failing to comply with GBV-related obligations. These actions were taken in response to the Panel's investigations into the transport and road sector projects in Uganda and DRC, and led to transformational change at the World Bank, especially in its approach to preventing and mitigating GBV.

### *Country-level Outcomes (Wider and Broader Improvements)*

At the country level, some Panel cases have contributed to improvements in country frameworks and capacity, which are agreed upon between the Bank and borrowers or voluntarily undertaken by the borrower. In some cases, these improvements have expanded well beyond the footprint of the Project.

For example, in a recent investigation into the [Uganda – North Eastern Road-Corridor Asset Management Project](#), the Panel noted in its findings that the lack of analysis or guidance in the project’s framework documents on the acquisition of quarries contributed to a subcontractor leasing the land from the community without applying the Involuntary Resettlement policy provisions and protections, causing harm to the community. In recognition of this gap, before the completion of the Panel’s investigation, the Uganda National Roads Authority prepared on a voluntary basis a set of guidelines on the acquisition of quarries.

In some cases, the World Bank has exercised its remedies by suspending financing of projects, pending the completion of agreed-upon actions. Such was the outcome in the [India – Mumbai Urban Transport Project](#), where the World Bank suspended disbursement to the road and resettlement component of the Project, in response to a request pertaining to issues concerning the resettlement of almost 20,000 households and shops in a dense and complex urban setting. In this case, the State of Maharashtra agreed to a 10-condition strategy for lifting the suspension of disbursements; once the State had substantially met these conditions, the Bank lifted the suspension. Subsequently, the Mumbai Metropolitan Region Development Authority mainstreamed the application of the resettlement and rehabilitation policy to resettlement activities beyond the project. It applied the project’s resettlement and rehabilitation entitlements framework to all of its resettlement projects beyond those supported by the Bank, and expanded the post-resettlement support strategy to all the resettlement sites irrespective of funding sources.

The Panel’s investigation report on the [India – Rural Water Supply and Sanitation Project for Low Income States](#) highlighted the need for the project’s frameworks to be implemented through a rigorous system that ensures on-the-ground risk-based analysis to be followed with detailed, site-specific assessments and mitigation plans. In its action plan, Bank Management acknowledged the Inspection Panel’s finding that the construction of the Bagbera and Chhota Govindpur Multi-Village Schemes financed under the project proceeded without the preparation of the required, site-specific environmental and social assessments and environmental management plans. As a result, the analysis of the potential environmental, social and cultural impacts of these schemes were not considered or factored into project design, required consultations did not happen, and steps to avoid and mitigate harm were not taken. Bank Management performed a comprehensive review, together with the borrower, of scheme-specific environmental and social safeguards documents available for water schemes funded under the project, to inform steps to comply with the policies going forward. Management reviewed and contributed to the improvement of 977 environmental data sheets, 305 environment management plans, and 795 cultural resources screenings of the areas covered by the Project.

### *The Conundrum of the Panel*

The Inspection Panel is simultaneously revered for what it stands for and criticized for not doing enough. It has inspired and informed the creation of independent accountability mechanisms at other multilateral development banks and bilateral agencies. The function and work of the Panel is taught in law schools around the world and is the focal topic of numerous academic articles and post-graduate theses on accountability and multilateral development banks. Since its creation, the Inspection Panel

has played an important role in promoting accountability, transparency, and good governance in World Bank operations.

The Panel's prestige and reputation in part results from its structure as a sitting Panel, rather than ad hoc as in some other systems. The Inspection Panel is composed of three Panel Members of different nationalities, who are at a certain level of seniority in their careers, and who have distinct and complementary subject matter expertise with the ability to deal thoroughly and fairly with the requests brought to them. Panel Members serve non-renewable terms and cannot work for the Bank after their term is over, guaranteeing their independence. They are selected based on their integrity and their independence from Bank Management. Because of the structure, term limit, prohibition against future work at the Bank, and other conditions provide confidence that the Panel will exercise their independent, objective judgment in determining whether a violation of Bank policies has led to harm to the requestors.

It is for these very reasons that requestors come to the Panel with high expectations, and hope their voices will be heard, their cases will be admitted, their issues will be investigated, harm will be identified, and remedies will be provided. The Panel is for them is often a place of last resort.

The Panel is however bound by its Resolution, which is the legal framework within which it operates. In some cases, requests are not admitted because the complaint is submitted after the project is closed, or the Bank did not have prior knowledge of the issues, or the Panel had previously considered the request and no new evidence or change in circumstances was presented, or the request reflects only unfulfilled expectations of benefits from the project without any other harm. In some cases, the Panel is unable to recommend an investigation because there is a lack of prima facie evidence of harm or a lack of plausible link between the harm and the Project. In addition, the Panel has no monitoring authority; its verification function is highly restrictive and requires Board approval, which means that the Panel may not be able to verify the implementation of management action plans as it sees fit.

As discussed previously, the lack of transparency on Project financing and lack of knowledge about the Inspection Panel create barriers to accessibility of the Panel. In addition, requestors often take big personal risks submitting these requests to the Panel and have to invest significant time and effort to build and engage with their cases over time - their fear of reprisals and the Panel's inability to guarantee protection once retaliation is experienced can also be a barrier to accessibility to the Panel.

The conundrum for the Panel is balancing these limitations while at the same time maintaining the legitimacy and influence of the impact of its cases, which stems from the rigor of its work and its legal framework. This framework is the imprimatur of the World Bank Board of Executive Directors. The same mandate, that lends credibility and legitimacy to the Panel's work including its ability to stand up to the highest level of scrutiny both at the World Bank and in the public domain, also imposes limitations on how far the Panel can extend its reach.

### *Conclusion*

The analysis of the Inspection Panel data shows a certain constancy about the Panel in its first three decades of existence. Panel investigations have generated a rich collection of learning and helped redress harm and provided some level of justice to those affected from Bank-financed projects. At a

minimum, the rigor and transparency of its work has helped to shine a light on persons and issues that may not have otherwise surfaced.

Revered or not, the Panel remains a pioneer among the international financial institutions. It not only broke new ground it has over time maintained its leading reputation as an independent, impartial fact-finding body. Its independence was hard won, is worked at constantly as it can never be assumed and is critical to the role it occupies as both the symbolic and actual figurehead of accountability.