MICI-BID-BR-2023-0216

ELIGIBILITY MEMORANDUM

CURITIBA SUSTAINABLE URBAN MOBILITY PROGRAM - REQUEST II

(BR-L1532)
(4958/OC-BR)

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In accordance with the Access to Information Policy, this document is being made publicly available simultaneously with its distribution to the Board for information.
ON THE MICI REGISTRATION PROCESS, ELIGIBILITY DETERMINATION ANALYSIS, AND PUBLIC REGISTRY

The Registration process begins when the Independent Consultation and Investigation Mechanism (MICI) receives a Request sent by Requesters, alleging that they have suffered or may suffer harm due to actions or omissions of the Inter-American Development Bank Group (IDB Group) that may constitute a failure to comply with one or more of its Relevant Operational Policies within the context of an operation financed by an IDB Group institution.

The Registration Phase lasts five business days, in which the MICI verifies that the Request contains all information required for processing and that it is not clearly linked with any of the exclusions that limit the MICI’s actions. Following the registration of a Request, the MICI gives the IDB, IDB Invest, or IDB Lab Management, as applicable, the opportunity to provide its perspective with respect to the allegations made in the Request, which must be sent to the MICI within 21 business days after registration in the form of a document known as the “Management Response.”

Once it receives the Response, the MICI has up to 21 business days to determine the eligibility of the Request based on the eligibility criteria established in its Policy.

If the Request is declared eligible, the process will begin for the phase selected by the Requesters; otherwise, the process will be deemed concluded.

All Requests received by the MICI and their processing will be recorded in the MICI’s online Public Registry. Case files will disclose all public information generated in processing a case.

The MICI does not award compensation, damages, or similar benefits. It is not empowered to suspend disbursements or halt operations.

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1 The MICI Director, in consultation with the Consultation Phase Coordinator and the Compliance Review Phase Coordinator, will determine the eligibility of the Requests. MICI-IDB Policy (document MI-47-8), subparagraph 23(d).
EXECUTIVE SUMMARY

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² For the purposes of transparency, the MICI indicates that a confidential version exists, and is only being shared with IDB Management and the IDB Board of Executive Directors.
EXECUTIVE SUMMARY

Curitiba, capital of the State of Paraná, is the largest city in southern Brazil, with 29 municípios in its metropolitan region and a population of approximately 3.5 million. Since 1960, Curitiba has been implementing road infrastructure projects that integrate infrastructure to enhance mobility with the decentralization of public services and different land uses, consolidating a city focused on urban sustainability and public transportation. Even so, the município of Curitiba currently faces road congestion challenges as a result of increased use of motor vehicles and economic growth. This in turn has impacted public transportation services, affecting passenger demand.

In this context, on 18 December 2019, the Board of Executive Directors of the Inter-American Development Bank (IDB) approved the “Curitiba Sustainable Urban Mobility Program” (BR-L1532) (“the program”), consisting of a sovereign guaranteed investment loan operation under the multiple-works program modality, for a total amount of US$133.4 million, financed with US$106.7 million from the Bank and a local counterpart contribution of US$26.7 million. The objective of the program is to improve urban mobility in Curitiba by increasing ridership demand on the city’s collective public transportation system. The specific objectives are: (i) to improve the system’s integration with complementary transportation modes; (ii) to enhance the operating efficiency of the Direta Inter2 bus route; and (iii) to make the bus stops and terminals of the Direta Inter2 route more accessible to pedestrians and mobility-impaired persons.

With respect to the social impacts, which represent the main allegation being made to the MICI, the program identified the following considerations to be addressed: (i) total and partial expropriation of properties for road widening and geometry improvements, with 273 properties affected throughout the program (224 partial and 49 total), 27 of which are in the representative sample (24 partial and three total, including the displacement of two residences and one empty lot); (ii) temporary impacts on the revenue of businesses located at the construction sites; and (iii) temporary impacts on the health and safety of construction workers and on the population in the area of direct influence. In accordance with the Bank’s Environment and Safeguards Compliance Policy (Operational Policy OP-703), this program was classified as a category “B” operation.

On 26 July 2023, the MICI received a Request from two residents (“the Group of Requesters”) of Curitiba, Brazil, who are being represented by two attorneys for purposes of the MICI process.

The Request alleges potential harm to the livelihoods, living conditions, and tangible assets of the Group of Requesters, because the property that the Requesters lease, where their motorcycle repair and parts sale business is located, is subject to total expropriation under the program. The Requesters also allege that they have not received information on whether they will benefit from relocation measures for loss of earnings or potential displacement.

The impacts described could be tied to potential noncompliance with Operational Policies, such as the Environment and Safeguards Compliance Policy (Operational Policy OP-703), the Access to Information Policy (Operational Policy OP-102), and the Involuntary Resettlement Policy (Operational Policy OP-710).

Regarding the MICI process, the Requesters, during the eligibility determination process, expressed their desire for the MICI to process the Request, if deemed eligible, through both phases of the MICI process: the Consultation Phase and the Compliance Review Phase.
The MICI Director, in accordance with Section G of the MICI Policy (document MI-47-8), concludes that this Request is eligible because it meets all eligibility criteria established in the Policy.

It is important to clarify that the eligibility determination process has at no time been an investigation of the operation or of the IDB. Declaring a Request eligible does not determine the IDB’s compliance or noncompliance with its Operational Policies.

In addition, it is important to specify that a potential dispute resolution process, with the MICI as facilitator (Consultation Phase), will seek to provide an expedited, flexible solution for this situation. Moreover, it is pertinent to point out that the MICI is only able to conduct an investigation during the Compliance Review Phase. This investigation would focus exclusively on the actions that IDB Management carried out to identify and address negative environmental or social impacts in accordance with the relevant Operational Policies.

This Memorandum was sent directly to the Group of Requesters and to Management for information on 18 September 2023. It will be distributed to the IDB Board of Executive Directors for the same purposes, and to any interested third parties through the Public Registry, once the English version is available.

After notifying the Board of Executive Directors, the MICI Director will transfer the case to the Consultation Phase, since the Group of Requesters indicated that it is interested in the Request being processed through both MICI phases.
I. **THE PROGRAM**

A. **Context**

1.1 Curitiba, capital of the State of Paraná, is the largest city in southern Brazil, with 29 municípios in its metropolitan region and a population of approximately 3.5 million. Curitiba is ranked fifth in terms of municipal gross domestic product (GDP), making it the main economic hub in Paraná and one of the most important in the Hemisphere.

1.2 Since 1960, as mentioned in its Master Plan, Curitiba has been implementing road infrastructure projects that integrate infrastructure to enhance mobility with the decentralization of public services and different land uses, consolidating a city focused on urban sustainability and public transportation. Even so, the município of Curitiba currently faces road congestion challenges as a result of increased use of motor vehicles and economic growth. This in turn has impacted public transportation services, which are failing to meet passenger demand. Passenger demand for Curitiba's collective public transportation system has declined, while trips made in private vehicles have increased. Among the determining factors of this problem are issues related to adequate integration with complementary transportation modes, the operational efficiency of the ring routes, and bus stop accessibility for nonmotorized transportation modes.

1.3 To improve the public transportation system, in 2018, the Município of Curitiba developed the Urban Mobility and Integrated Transportation Plan (PlanMob). This plan seeks to modernize and prioritize public transportation through dedicated lanes for bus rapid transit (BRT), new accessibility features for mobility-impaired persons, automated ticket validation, and larger capacity vehicles that are more energy-efficient. This is important in identifying the reason for the IDB’s decision to provide financing support for the execution of several complementary projects to address mobility issues.

B. **The Bank’s involvement**

1.4 In this context, on 18 December 2019, the Board of Executive Directors of the IDB approved the “Curitiba Sustainable Urban Mobility Program” (BR-L1532), consisting of a sovereign guaranteed investment loan operation under the multiple-works program modality, for a total amount of US$133.4 million, financed with US$106.7 million from the Bank and a local counterpart contribution of US$26.7 million. The guarantor for this operation is the Federative Republic of Brazil. The executing agency is the Município of Curitiba (“the borrower”), acting

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3 Information taken from the Bank’s website and public documents on the related operation. These documents are available in the links section.

4 Urban Mobility Observatory: Curitiba. Available at: [https://www.caf.com/es/temas/o/observatorio-de-movilidad-urbana/ciudades/curitiba/](https://www.caf.com/es/temas/o/observatorio-de-movilidad-urbana/ciudades/curitiba/).

5 This plan prioritizes public transportation and close ties between mobility and land use legislation. Available at: [https://shorturl.at/emn15](https://shorturl.at/emn15).

6 PlanMob is part of the Master Plan approved through municipal laws in 2015 and ratified in 2018.

7 Fortaleza Urban Transportation Program II (3289/OC-BR); Santo André Sustainable Urban Mobility Program (3708/OC-BR); Maracanaú Transportation and Urban Logistics Program (4445/OC-BR); São Paulo Metro Line 5 (Purple Line) Extension Project (2305/OC-BR); Blumenau Sustainable Mobility Program (2746/OC-BR); and São Bernardo do Campo Urban Transportation Program II (2888/OC-BR).
through the Technical-Administrative Management Unit (UTAG). According to public information from the IDB, the operation is now in implementation.

1.5 The objective of the program is to improve urban mobility in Curitiba by increasing ridership demand on the city’s collective public transportation system. The specific objectives are: (i) to improve the system’s integration with complementary transportation modes; (ii) to enhance the operating efficiency of the Direta Inter2 bus route; and (iii) to make the bus stops and terminals of the Direta Inter2 route more accessible to pedestrians and mobility-impaired persons.

1.6 As part of PlanMob, it was determined that this operation would focus its interventions mainly on the Direta Inter2 route, which was designed to enable buses to travel without interference from general municipal traffic. This route is a 38-kilometer-long ring route (line) connecting 28 of Curitiba’s 75 neighborhoods, with 19 bus stops and terminals where passengers transfer to and from more than 40 feeder lines serving the outlying neighborhoods of the Metropolitan Region of Curitiba. As a result of program execution, travel times are expected to be shortened by 35% and service quality improved for the passengers who use this transportation method.8

1.7 To achieve its proposed objectives, based on the loan proposal, the operation includes the following two main components:

- **Component I. Civil works and works supervision.** This component will finance: (i) implementation of exclusive or preferential road infrastructure along the Direta Inter2 route, totaling approximately 60 kilometers, and rehabilitation of urban infrastructure with universal accessibility; (ii) implementation of Integrated Transport Network (RIT) public transport terminals and public transport integration stations along the Direta Inter2 route; (iii) implementation of socioenvironmental plans, expropriations, and compensation payments for temporary effects on businesses; and (iv) technical supervision.

- **Component II. Innovation and technologies.** This component will focus on financing hardware, software, and personnel training, as well as studies and development of applications and new technologies. It will also finance the implementation of the gender-sensitive walkability index methodology and awareness campaigns to prevent violence against women.

1.8 Because the operation uses the multiple-works modality, it will finance projects of similar physical characteristics but mutually independent, and their feasibility does not depend on the execution of any given number of projects or interventions. The program has a five-year disbursement period. According to information from the Bank, each work to be financed by the program must satisfy the following eligibility criteria: (i) build improvement works along the Inter2 route as defined by PlanMob; (ii) demonstrate a positive economic return; and (iii) address the requirements identified in the environmental and social management framework, excluding category “A” projects.

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8 Loan proposal for BR-L1532, pages 5 and 7.
1.9 The program was evaluated by analyzing a representative sample of projects of the type of works to be financed, along with their expected socioenvironmental impacts. The sample included works representing the types of actions that satisfy the eligibility criteria mentioned above.

1.10 The property that is the basis for the complaint before the MICI is located in Batch 2 (Capão Raso – Xaxim) (see Figure 2), where road infrastructure works are planned. Management stated to the MICI that this batch was not part of the representative sample of program works.
1.11 Based on the environmental and social management report that the Bank prepared and on the environmental and social impact assessment that the executing agency prepared, the program was classified as a category “B” operation in accordance with the Environment and Safeguards Compliance Policy (Operational Policy OP-703) due to the environmental and social impacts identified.

1.12 Specifically, the environmental impacts identified would mainly occur during the construction stage, including soil pollution, noise, greenhouse gas emissions, and traffic increases. Meanwhile, with respect to negative social impacts, which are the basis for the complaint before the MICI, the following considerations to be addressed were identified: (i) total and partial expropriation of properties for road widening and geometry improvements, with 273 properties affected throughout the program (224 partial and 49 total),9,10,11 27 of which are in the representative sample (24 partial and three total, including the displacement of two residences and one empty lot); (ii) temporary impacts on the revenue of businesses located at the construction sites; and (iii) temporary impacts on the health and safety of construction workers and on the population in the area of direct influence. Moreover, the loan proposal indicates that the program’s local contribution (US$26.7 million) would be allocated to the compensation and rehabilitation of the property owners affected.

1.13 For Batch 2, in the environmental and social management report, the Bank identified a total of 111 expropriations of properties, 96 of them partial and 15 total expropriations.

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9 The environmental and social impact assessment determined this based on land use legislation in Curitiba, which calls for a minimum distance of five meters between road construction and properties.

10 Environmental and social impact assessment, page 41.

11 The list was subsequently updated and included in detail in Decree 25/2023: “Declara de utilidade pública para fins de desapropriação os imóveis abaixo especificados.”
1.14 With respect to socioenvironmental management documents, IDB Management notes that for the works in the sample, an environmental and social management plan and an involuntary resettlement plan were prepared. For the works not included in this representative sample, an environmental and social management framework and an involuntary resettlement framework were prepared.

1.15 The involuntary resettlement framework establishes the procedures for impact analysis, criteria to classify properties, methodology to calculate compensation, and administrative procedures for impact payments. These serve as guidance for specific resettlement plans for the various program works.\footnote{Involuntary resettlement framework, section 5.}

II. The Request\footnote{The Request and Annexes are available in the links section of this document.}

2.1 On 26 July 2023,\footnote{Since the current MICI Policy entered into effect, the MICI has regarded the date of formal receipt as the next business day after a new Request is received, to fully comply with the five days established in the Policy for processing Registration, so the date of receipt is marked as 6 September 2022.} the MICI received a Request from two residents (“the Group of Requesters”) of Curitiba, Brazil, who are being represented by two attorneys for purposes of the MICI process.

2.2 After reviewing the documents that the Group of Requesters submitted, the MICI registered the Request on 1 August 2023. Information classified as public is available in the MICI Public Registry (case file for Request \textit{MICI-BID-BR-2023-0216}).

2.3 The Request alleges potential harm to the livelihoods, living conditions, and tangible assets of the Group of Requesters, because the property that the Requesters lease, where their motorcycle repair and parts sale business is located, is subject to total expropriation under the program. The Requesters also allege that they have not received information on whether they will benefit from relocation measures for loss of earnings or potential displacement.

2.4 They state that they have been leasing that property for more than 17 years and it has become a known commercial location in the município of Curitiba. In addition, this situation affects the source of employment for 13 permanent employees and 30 subcontracted persons. The Group of Requesters highlights that it has a lease contract in effect until 8 August 2026.

2.5 The Request states that recently, on 5 June 2023, the owner of the property where the business is located received a notification from the Município of Curitiba, informing them that their property that appears in the land registry had been declared as having public purposes and that the total expropriation of the property would take place.

2.6 The Group of Requesters states that, because of this notification, it contacted the UTAG and the Curitiba Research and Urban Planning Institute (IPPUC), which are responsible for monitoring structural works carried out in Curitiba. Then, the Requesters were allegedly informed that under the program, only the owners of the properties affected would receive compensation, and that there were no plans to compensate those leasing or having a commercial location in the affected area.
2.7 As a result, the Group of Requesters states that it began an administrative process with the Município of Curitiba, aimed at negotiating potential compensation due to the impacts caused by the expropriation of the property that it leases and where it has their business. The Group adds that, despite this, the document was not forwarded to the UTAG for a new analysis of the economic and social viability of the case.

2.8 On 29 June 2023, according to the Request, the owner of the lot who was notified about compensation agreed to and received as compensation from the Município of Curitiba the amount of R$1,470,000, according to which the property is required to be vacated by 30 September 2023. The Group of Requesters highlights that this compensation is unavailable to them as lessees of the property being expropriated, and that it is only for the owner of the property where their business is located.

2.9 The Requesters believe that the Bank and the executing agency disregarded Clause 4.08 of the signed contract, regarding the need for environmental and social management, since the environmental and social impact assessment and the involuntary resettlement framework do not contain information about the businesspeople who occupy leased properties or about restitution; in particular, there is no mention of the goodwill of a business.15 Specifically, they point out that, while they are not the owners of the property being expropriated, they do possess its goodwill, and that this is an asset obtained by those who develop it, as in their case.

2.10 Regarding prior contact with Management, the Group of Requesters originally submitted its Request to the MICI in June 2023 (see Request MICI-BID-BR-2023-0213); however, that Request was not registered because there had been no prior contact with IDB Management, so the Requesters were referred to the IDB Environmental and Social Grievance Protocol. The Group notes that it submitted its concerns to Management. However, despite several interactions, the issues put forward have not been resolved, so they decided to return to the MICI.

2.11 Regarding the MICI process, the Requesters, during the eligibility determination process, expressed their desire for the MICI to process the Request, if deemed eligible, through both phases of the MICI process: the Consultation Phase and the Compliance Review Phase.

III. MANAGEMENT RESPONSE16

3.1 Management was notified of the registration of Request MICI-BID-BR-2023-0216 on 1 August 2023, pursuant to paragraph 21 of the MICI-IDB Policy, and delivered its Response to the MICI on 30 August. The content of the public version of the Management Response is summarized below.

3.2 In its Response, Management states, with respect to the process of adopting measures to mitigate the impact on commercial activities, that compensation measures had been planned for the owners of the properties affected. This is based

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15 In the Request, the Group of Requesters mentions that considerations regarding goodwill are governed by the Brazilian Civil Code (Title III, Articles 1142 to 1149). As they interpret it, goodwill is equivalent to business assets, which include the totality of the assets obtained by a business owner or corporation to carry out the activities of the business.

16 The public and confidential versions of the Management Response document are included in the links section.
on municipal legislation in effect, which calls for the Município to deal exclusively with the owner in case of expropriation.

3.3 In addition, with respect to the "type of assistance" that the operation would provide to nonvulnerable lessees, Management reports that: "the persons leasing properties for commercial use can be referred to existing municipal services to receive support in reestablishing their commercial activities in other properties, such as the programs Curitiba Empreendedor, Agência Curitiba, and Fundo de Aval."17

3.4 With respect to the executing agency, Management states that it has a Technical Office with a team responsible for environmental and social management, as well as support from the following municipal entities for program execution regarding these matters: the Curitiba Research and Urban Planning Institute (IPPEC); the Municipal Planning, Finance, and Budget Department (SMF); the Municipal Government Department (SGM); the Municipal Attorney’s Office (PGM); and the Municipal Public Works Department (SMOP).

3.5 Regarding conducting the public consultation, Management indicates that, as of the date of its Response, the public consultation for the involuntary resettlement plan has not taken place, and that the execution of this plan is contingent upon this consultation, which is planned to take place as soon as possible.

3.6 Lastly, the Response notes that there is an ongoing administrative process related to the matter of compensation proposed by the UTAG to the Group of Requesters.

IV. MICI ACTIONS

4.1 In accordance with Section G of the MICI-IDB Policy and the eligibility criteria set out in paragraph 22, the Request intake and eligibility determination process followed the timeline below:

<table>
<thead>
<tr>
<th>Date</th>
<th>Actions</th>
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<tbody>
<tr>
<td>26 July</td>
<td>Request received</td>
</tr>
<tr>
<td>1 August</td>
<td>Request registered and notifications sent to the Requesters and IDB Management</td>
</tr>
<tr>
<td>4 August</td>
<td>Video call with the Requesters</td>
</tr>
<tr>
<td>26 July to 18 September</td>
<td>Document review and desk work</td>
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<tr>
<td>30 August</td>
<td>Receipt of Management Response</td>
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<tr>
<td>31 August</td>
<td>Video call with the Requesters</td>
</tr>
<tr>
<td>1 September</td>
<td>Video call with the IDB Project Team</td>
</tr>
<tr>
<td>18 September</td>
<td>Eligibility Memorandum issued</td>
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17 Paragraph 23 of Management Response, public version.
Following receipt of the Request, the MICI reviewed the relevant documentation to better understand the operation, the allegations made, and how the complaints had been addressed before reaching the MICI.

The MICI is grateful to all parties for their willingness to promptly reply to and address its various requests for information, response, and communication.

Importantly, the MICI decided not to conduct a field visit as part of its eligibility determination process, and to issue this Memorandum earlier (its original deadline was 29 September) because of the approaching eviction date for the Group of Requesters, 30 September 2023.

V. ELIGIBILITY DETERMINATION ANALYSIS

As part of the eligibility determination process, the MICI considered the information presented in the Request, the Management Response, various program documents, and other relevant documents.18

Pursuant to paragraph 22 of the MICI-IDB Policy, a Request will be deemed eligible by the MICI, if it is determined that the Request meets all the following criteria:

a. The Request is filed by two or more persons who believe that they have been or may be affected and who reside in the country where the Bank-financed Operation is implemented. If the Request is filed by a representative, the identity of the Requesters on whose behalf the Request is filed will be indicated, and written proof of representation will be attached.

b. The Request clearly identifies a Bank-financed Operation that has been approved by the Board, the President, or the Donors Committee.

c. The Request describes the Harm that could result from potential noncompliance with one or more Relevant Operational Policies.

d. The Request describes the efforts that the Requesters have made to address the issues in the Request with Management and includes a description of the results of those efforts, or an explanation of why contacting Management was not possible.

e. None of the exclusions set forth in paragraph 19 applies.

In the case of Request MICI-BID-BR-2023-0216, the analysis of eligibility criteria established in the Policy is as follows:

The Request was filed by two residents of the city of Curitiba, Brazil, owners of a business located in one of the properties being expropriated under the program, which they lease. Both are represented by two attorneys for purposes of the MICI process. The MICI has the contact information for the Group of Requesters and their representatives. Consequently, Criterion 22(a) has been met.

The Request identifies the “Curitiba Sustainable Urban Mobility Program” (BR-L1532), which the Board of Executive Directors approved on 18 December 2019. The operation is an investment loan under the multiple-works program modality, with road works along the Direta Inter2 route in the city of Curitiba, Brazil. Specifically, the

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18 The documents reviewed are available in the links section of this document.
program includes works in the area of Capão Raso – Xaxim (Batch 2), where the property that the Group of Requesters leases and works at is located. Consequently, criterion 22(b) has been met.

5.6 The Request alleges potential harm to the livelihoods, living conditions, and tangible assets of the Group of Requesters, because the property that the Requesters lease, where their motorcycle repair and parts sale business is located, is subject to total expropriation under the program. The Requesters also allege that they have not received information on whether they will benefit from relocation measures for loss of earnings or potential displacement.

5.7 The impacts described could be tied to potential noncompliance with Operational Policies, such as the Environment and Safeguards Compliance Policy (Operational Policy OP-703), the Access to Information Policy (Operational Policy OP-102), and the Involuntary Resettlement Policy (Operational Policy OP-710). Consequently, criterion 22(c) has been met.

5.8 Regarding prior contact with Management, the MICI has corroboration from the Group of Requesters and from Management that their initial interaction occurred in June 2023. Therefore, criterion 22(d) has been met.

5.9 Regarding the exclusions provided in paragraph 19, the MICI concludes that none of the exclusions\(^\text{19}\) in subparagraphs 19(a), 19(b), 19(c), 19(e), and 19(f) applies because the Request does not raise issues beyond the scope of the MICI; contains the contact information for all members of the Group of Requesters; has not already been reviewed by the MICI through any of its phases; and the cited operation was approved by the IDB Board of Executive Directors in 2019 and is in implementation.

VI. CONCLUSION

6.1 The MICI Director, in accordance with Section G of the MICI-IDB Policy (document MI-47-8), concludes that this Request is eligible because it meets all eligibility criteria established in the Policy.

6.2 It is important to clarify that the eligibility determination process has at no time been an investigation of the operation or of the IDB. Declaring a Request eligible does not determine the IDB’s compliance or noncompliance with its Operational Policies.

6.3 In addition, it is important to specify that a potential dispute resolution process, with the MICI as facilitator (Consultation Phase), will seek to provide an expedited, flexible solution for this situation. Moreover, it is pertinent to point out that the MICI is only able to conduct an investigation during the Compliance Review Phase. This investigation would focus exclusively on the actions that IDB Management carried out to identify and address negative environmental or social impacts in accordance with the relevant Operational Policies.

6.4 This Memorandum was sent directly to the Group of Requesters and to Management for information on 18 September 2023. It will be distributed to the

\(^{19}\) As of 1 July 2021, the exclusion in subparagraph 19(d) of the MICI-IDB Policy was rescinded, so it is not reviewed in this Memorandum.
IDB Board of Executive Directors for the same purposes, and to any interested third parties through the Public Registry, once the English version is available.

6.5 After notifying the Board of Executive Directors, the MICI Director will transfer the case to the Consultation Phase, since the Group of Requesters indicated that it is interested in the Request being processed through both the Consultation Phase and the Compliance Review Phase.