

Att.:

Ms. Kristalina Georgieva, Managing Director, International Monetary Fund (IMF)

Ms. Gita Gopinath, Deputy Managing Director, IMF

Ms. Ceyla Pazarbasioglu, Director of the Strategy, Policy, and Review Department, IMF
Executive Directors, IMF

Dear Sir/Madam,

We, the undersigned economic justice, human rights, environmental and climate justice, and feminist civil society organisations, are writing to express concerns about the lack of transparency, clarity, consistency and ambition regarding CSO engagement in recent reviews of IMF policies.

The IMF [2015 Civil Society engagement guidelines](#) state that “the IMF recognises the benefits from a transparent and wide engagement with CSOs, as means of improving its policy advice and analysis” - a standpoint that has also been expressed in numerous exchanges we have had with senior IMF staff and Executive Directors. However, we strongly believe this is a crucial moment to review and update the almost a decade-old guidelines, and assess how they have been put into practice. This is particularly important in light of the Fund’s expansion into “new” areas including gender and climate, which were merely in their infancy at the time of the guidelines’ development.

In their latest report on the ‘[Evolving Application of the IMF's Mandate](#)’ the Independent Evaluation Office (IEO) found a conflation of terminology of collaboration, together with a lack of specifics and the absence of an evaluation system. In response, the report concluded with a recommendation to “adopt an Executive Board-approved high-level Statement of Principles for Engagement with Partners to establish a coherent best practice framework.” These findings - many of which were in fact already flagged in the 2015 guidelines - align with our own experiences engaging with the IMF, and which have reflected a systematic absence of many of the “best practices” and recommendations included in the guidelines. We particularly regret that the lack of clarity on timelines, scope, and opportunities for formal engagement and consultation in policy review processes seems to be becoming the norm. Beyond policy reviews, we note that transparency, engagement, and consultation in interim reviews, guidance notes and at country level also fall behind the standards both recommended in the 2015 guidelines and, as such, expected by civil society.

We acknowledge and welcome that IMF staff are often willing to participate in and convene exchanges with CSOs, both in person and online, and that consultation has been opened in some IMF policy review processes. However, these efforts are not systematic and do not apply to all the relevant processes. Rather, they often rely on the personal willingness of IMF staff or come as a response to CSO advocacy efforts. While the support from the Civil Society liaison has been crucial to securing some of these participation spaces, we believe that adhering to set standards for CSO engagement should be common practice and not the result of our insistence or the discretion of individual staff.

For example:

- **Surcharges policy review:** While civil society has been very active in calling for the end of the IMF surcharges policy, we have had to work with rumours and media reports to ascertain when and to what extent the IMF Board would be discussing the issue. We understand that such a review is taking place, but we lack clarity on the calendar and whether there will be opportunities for CSO engagement or consultation
- **PRGT review:** As the concessional window for low-income-countries, the review of the PRGT is a particularly relevant process for civil society. We understand from informal discussions that this is ongoing, but there is no clear timeline nor any information about CSO consultation or engagement in the review.
- **LIC DSF review:** The process was presented to a group of CSOs, mostly from the global north, at this year's Spring Meetings. However, no ToRs or clear timeline were shared, and we do not know how or when the consultation process will be opened to civil society. The fact that the presentation was both in person in Washington and by invitation only is particularly concerning as it does not speak of an inclusive process, specifically in relation to the inclusion of civil society from the global south.
- **Conditionality and Surveillance reviews:** According to the [MD statement on the FY 2025 workplan](#), the Board will engage in informal briefings on conditionality review, with the aim of concluding the formal review in 2025. The same MD workplan also mentions the Board undertaking initial informal engagements on the upcoming surveillance review. Yet, there is no further information on timeline, scope or consultation in these processes.
- **MD workplan:** For instance, the FY 2025 workplan does not contain any helpful detail regarding the different policy review processes to be undertaken by the management, Board and staff. Since there are no clear calendars, we are often forced to follow informal information and rumours, and prepare our work amidst many uncertainties.
- **RST interim review:** The scope and calendar are also rarely available in interim reviews, as was the case in the recent interim review of the Resilience and Sustainability Trust. Consequently, civil society does not have the chance to provide inputs into the processes, and the final reports are not shared with us in a timely manner (or are only made available after we publicly request them).
- **Interim guidance note on mainstreaming gender:** It lacks any concrete requirements for staff to consult or engage with civil society, despite stating that fostering external collaboration is "a critical pillar of the gender strategy". The full guidance note is scheduled to be published in FY 2026, but once again without consultation or information on the evaluation methodology to get to that stage. Furthermore, the gender 'toolkits' that are currently in operation are not publicly available.
- **IMF and the World Bank joint 'Bretton Woods at 80 Initiative':** We recently learned from a [press release](#) about this initiative, including "a consultation tasked with developing a long-term view on the future of the world economy, international cooperation, and the roles of the Bank and the Fund". Again, no information is available on timelines or whether CSOs will be part of the stakeholders and how we will be able to contribute to this key debate on the future of the Bretton Woods Institutions.

All of the above are key policies for civil society as they directly affect the well-being and rights of millions of people around the world, and particularly in the global south. As CSOs, we engage in the oversight of these policies in a rigorous and serious manner but are often confronted with informalities and lack of official consultation, as well as short timelines or lack of information and clarity. Some processes, like the [“Review of the IMF’s Anti-Money Laundering and Combating the Financing of Terrorism Strategy”](#), included some good practices in the public consultation process, which should be considered as a minimum standard, but this is rarely the norm for policies at the core of the IMF mandate.

Finally, engagement and consultation with CSOs at country level is uneven across regions and countries, often lacking minimum standards for a meaningful participation. Both at country level and in regional and global policy discussions, where spaces for CSO engagement are available, these are often limited to information sharing meetings with IMF staff. Official and formal consultations to provide inputs into policy reviews are scarce.

As a recent [report](#) by Oxfam showed, CSOs often struggle in “identifying positive impacts from the engagement with IMF officials questioning their usefulness”. A key element is the lack of understanding of the local political and social context by many IMF officials. CSOs have also highlighted the limited opportunities for all national and local CSOs to participate equally, as only a select few are contacted repeatedly.

The Fund’s own 2015 guidelines identified many of the same issues, such as frustration with being asked to “rubber stamp *a fait accompli*”; that “there should be a framework for consultations with CSOs, especially for those countries with IMF programs”; that engagement “has little impact on policy design and implementation”; and that CSOs “are often not given enough notice to properly prepare.” The guidelines also included several ‘good practices’, yet little has changed in practice.

For all of the above reasons, we request that the IMF staff, management and Board commit to clear practices for civil society engagement, including, at minimum, the following:

- Clarity in the annual workplan of the scope and general calendar of the different policy and strategy reviews, new policies and strategies, interim reviews, and planned guidance notes, which states the ways for civil society to engage in each process.
- Details on the scope, process, and concrete timelines of each process should be available prior to the outset with accessible terms of reference for each process.
- A commitment for meaningful CSO consultation in the different policy review processes, and new policies and strategies, that should include, at minimum:
 - Timeline: A clear calendar for when the CSO consultation process will happen and is known well in advance, as stated in the 2015 guidelines: “planning for a consultation process should start about six months before the scheduled Board Discussion of the policy paper.” Additionally, the consultation should be open for at least 8 weeks.
 - Transparency: Public access to key documents and inputs relevant to the consultation from all stakeholders. These documents are to be accessible on the IMF

website on a page devoted to the review process, ahead of the consultation period. This includes adding all stakeholders' inputs to the consultation on the same page, not only those from CSOs.

- Scope: The scope of the consultation should be clearly defined, with an outline or a briefing as a basis for consultation.
 - Discussion and formal inputs: All processes need to include a combination of discussion meetings with IMF staff and/or management (online or hybrid to facilitate participation) and formal process to provide written inputs.
 - Global south participation in regional and global processes: Staff needs to ensure a geographical balance and representation of global south civil society in policy discussions at regional and global levels. This includes facilitating visas to participate in the Spring and Annual Meetings, ensuring safety and seamless participation at the Spring and Annual Meetings, providing logistics for hybrid participation in in-person meetings, and providing interpretation in online meetings.
 - Considering the inputs: CSOs inputs in the consultation should be reflected upon via a staff or board paper referring back to the feedback provided by civil society and other stakeholders, or at least summarising it.
- Engagement should not only be with civil society, but also with heterodox academics and relevant critical literature/research, particularly from the global south.
 - In the case of interim reviews and guidance notes, information and documents about the process should be available to civil society, including informative sessions and opportunities to provide inputs.
 - CSO participation at country level: Staff needs to make efforts to facilitate the participation of civil society from the global south in relation to access to country level staff, engagement in country program discussions, provide interpretation to local language(s) when needed, and ensure access to key documents in local language(s), amongst other facilities. Information and consultation at country level should also follow the above criteria of clear calendar (systematising meetings as much as possible), transparency, clarity on the scope of the discussions, and possibility to provide formal inputs in a way that need to be considered.

Based on all of the above, the undersigned organisations propose the following:

First, a decade after the publication of the 2015 guidelines and in the context of a significantly evolved mandate, **we request an evaluation of the guidelines**, assessing whether and how the recommendations in the note have been implemented or ignored, and to what extent the different concerns expressed by CSOs still stand.

Second, it is clear to us that one of the crucial issues of the guidelines is that they are not mandatory, and the IEO report once again makes the case for a Board-mandated framework. We therefore **call on the IMF to set up a clear policy to be approved by the Board that would set systematic and mandatory rules for civil society engagement**, including at country level.

Sincerely,

Global networks

1. Action Aid International
2. Big Shift Global
3. Center for Economic and Social Rights (CESR)
4. Global Initiative for Economic, Social and Cultural Rights (GI-ESCR)
5. Global Student Forum
6. Oxfam International
7. Recourse
8. Right to Education Initiative

Europe

1. European Network on Debt and Development (Eurodad), Europe
2. 11.11.11, Belgium
3. Bretton Woods Project, United Kingdom
4. CAFOD, United Kingdom
5. Centre for Social Innovation, Austria
6. Christian Aid, United Kingdom
7. CNCD-11.11.11, Belgium
8. Debt Justice Norway, Norway
9. Debt Justice UK, United Kingdom
10. erlassjahr.de, Germany
11. Estonian Roundtable for Development Cooperation, Estonia
12. Germanwatch, Germany
13. Green Economy Coalition (GEC), United Kingdom
14. Koordinierungskreis Mosambik e. V., Germany
15. ODG - Debt Observatory in Globalisation, Spain
16. Soroptimist International, United Kingdom
17. The Norwegian Council for Africa, Norway
18. Urgewald, Germany
19. WEED - World Economy, Ecology & Development, Germany
20. Wemos, Netherlands

Africa

1. Africa for SDGs, Kenya
2. Alliance contre la Pauvreté au Mali/GCAP, Mali
3. Association de Développement Agricole Educatif et Sanitaire de Mano, DRC
4. Association Jeunes Agriculteurs (AJA), Cote d'Ivoire
5. Club Changement Climatique de Ziguinchor, Senegal
6. Good Health Community Programmes, Kenya
7. Jumuiya Women Fund, Kenya
8. Make Way, Kenya
9. Moumbo Climate Change Response Organisation, Zambia
10. Movement for Debt and Reparations, South Africa

11. Network Movement for Democracy and Human Rights (NMDHR), Sierra Leone
12. Okoa Uchumi Campaign Coalition, Kenya
13. Resilient40 (R40), South Africa
14. Southern and Eastern Africa Trade Information and Negotiations Institute (SEATINI), Uganda
15. Youth Initiative CEN-SAD, Senegal

MENA

1. Arab NGO Network for Development, MENA region
2. Arab Reform Initiative (ARI), MENA region
3. Arab Watch Coalition, Middle East and MENA region
4. MenaFem Movement for Economic, Development and Ecological Justice, MENA region
5. Bahrain Transparency, Bahrain
6. Feminist Economy for Training and Development -JoWomenomics, Jordan
7. Center for Social Sciences, Research and Action (CeSSRA), Lebanon
8. Iraqi Democratic Future Network (IDFN), Iraq
9. Phenix Center, Jordan
10. Tamkeen for Legal Aid and Human Rights, Jordan

Asia

1. Alternative Law Collective (ALC), Pakistan
2. Alliance for Climate Justice and Clean Energy (ACJCE), Pakistan
3. Association For Promotion Sustainable Development, India
4. Centre for Environmental Justice, Sri Lanka
5. Monitoring Sustainability of Globalisation, Malaysia
6. National Labour Academy, Nepal
7. PF Nash Vek, Kyrgyzstan
8. Policy Research Institute for Equitable Development (PRIED), Pakistan
9. Rural Area Development Programme (RADP), Nepal
10. Shirakat, Pakistan
11. Sukaar Welfare Organization, Pakistan

Latin America and the Caribbean

1. Red Latinoamericana por Justicia Económica y Social (LATINDADD), Latin America
2. Asociación Mujeres Emprendedoras de Alta Verapaz MEAV, Guatemala
3. Caribbean Policy Development Centre, Barbados
4. Centro de Documentación en Derechos Humanos "Segundo Montes Mozo SJ" (CSMM), Ecuador
5. Peru Equidad, Peru
6. Project Allende, Argentina

Northern America

1. AidWatch Canada, Canada
2. Gender Action, United States
3. The Sentry, United States