

COALITION FOR HUMAN RIGHTS IN DEVELOPMENT

RESTRICTED PARTICIPATION

Recent Trends in Latin America that Undermine
the Right to Participation in the Context of
Development Projects



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Various members and partners of the [Coalition for Human Rights in Development](#) from Latin America contributed to this report. In particular, we thank for their contributions:

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- PODER | Mexico
- Sustentarse | Chile

We are a global coalition of social movements, civil society organizations, and grassroots groups working together to ensure that development is community-led and respects, protects, and fulfills human rights. We work to ensure that communities have the information, power, and resources necessary to determine their own development paths and priorities and to hold development finance institutions, governments, and other actors accountable for their impacts on people, communities, and the planet.

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About this brief

This brief aims to document and highlight two recent regulatory trends that are being adopted and implemented in Latin American countries, which severely restrict civic space and the right to participation of civil society organisations and human and environmental rights defenders in the context of development projects.

The first trend consists of the promotion and approval of laws that unduly regulate the financing, formation, registration and control of civil society organisations in ways that seriously limit their autonomy and independence and threaten their very existence.

The second trend consists of the **weakening of safeguards**, rights and protections established in environmental protection laws, restricting opportunities for participation and access to information in the context of certain projects.

Various civil society organisations have expressed concern about how these regulations affect communities, organisations and environmental and human rights defenders who want to express themselves and, in many cases, oppose projects financed by development banks, whose policies affirm their commitment to the right to consultation and participation, and the informed consent of Indigenous communities.

In this document, we provide some **examples of this type of reform** in various countries in the region, adopted in the last five years, and highlight only some of their most problematic aspects, without conducting an exhaustive analysis of each regulation or of how these trends manifest themselves in all countries.

We also devote a section of the document to explaining why these restrictions on civic space affect the right to participation and compromise the possibility of projects being designed and implemented in a manner that respects **human rights** and effectively contributes to achieving their objectives.

In the last section, we make a series of **recommendations** for development banks operating in the region.



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The role of public development banks

Each year, development banks invest billions of dollars in Latin America. In 2024, the Inter-American Development Bank Group (IDB and IDB Invest) allocated more than \$26 billion to the region, while the World Bank and its private arm, the International Finance Corporation (IFC), financed projects worth more than \$20 billion. For its part, in June 2025, CAF approved \$5.2 billion for 16 projects.

The influence of these banks and the impact of their investments on people and the environment is very significant. After recognising the catastrophic impact of many investments, and in order to avoid and reduce their negative social and environmental impacts, development finance institutions have adopted a series of policies and safeguards that recognise, among other things, the right of access to information and free participation of affected people and communities, including specific safeguards relating to gender and the collective rights of Indigenous peoples.

Many banks have also adopted specific statements and policies of zero tolerance for reprisals against those who criticise their projects.

Based on these commitments, the decision to invest in contexts where the advancement of policies restricting civic space makes participation impossible or highly risky should be subject to extremely rigorous scrutiny and justification.

However, as documented in the report "Financing Repression" (Coalition for Human Rights in Development, 2024), in practice banks have paid little attention to civic space and have continued to invest in countries whose civic space has been considered "closed."

Furthermore, in their assessments, they have not explicitly stated the increased risks of reprisals that exist in these contexts, nor how they justify their investments, despite the impossibility of guaranteeing the participation of the people affected. For example, globally, the World Bank has invested nearly \$23 billion in countries where civic space is closed, and has been criticised for failing to sufficiently analyse the context and environment in which communities exercise their right to participation in the context of its projects.

[Read the report](#)
["Financing Repression"](#)

In the region, the World Bank has maintained investments in Nicaragua, a country where civic space has been closed since 2021. According to its [website](#), as of February 2026, the World Bank's portfolio in Nicaragua includes 16 projects totalling approximately US\$478.04 million. The CABEL, for its part, also [actively invests](#) in Nicaragua.


Other countries in the region with serious restrictions on civil liberties are Cuba and Venezuela. Cuba is not a member of the IDB or the World Bank, and in the case of Venezuela, its access to development financing has been significantly restricted for several years. Both countries face heavy sanctions from the United States, the main shareholder of these banks. In the case of Cuba, these measures have recently intensified, including actions aimed at restricting its access to oil, exacerbating the economic crisis on the island. In January 2026, the United States also intervened militarily in Venezuela, violating international law, and implemented total control of its oil resources. In a context of [threats](#) from the United States towards the incumbent president, and without a sovereign and democratic process having been implemented so far, [press articles](#) have already begun to point to the intention to resume banks' intervention in the country.

In turn, according to the CIVICUS Monitor (a research tool that provides data on the state of civil society and civic liberties in 196 countries), Colombia, El Salvador, Guatemala, Haiti, Honduras, Mexico, and Peru currently have repressed civic space, the second-worst rating. Despite this, development finance institutions invest substantial resources in these countries without specifying how they guarantee participation and prevent reprisals in the context of their projects.

The analysis of restrictions on civic space and how these restrictions limit or render participation impossible should be part of the contextual analysis prior to all projects and should be made public in all cases, without responding to the geopolitical interests of shareholder countries.

Civil society groups working in contexts where civic space is closed hold divergent views on how development finance institutions should act and whether they should invest in such countries. Beyond these differences, civil society groups operating in restrictive contexts and their allies agree that DFIs should act with extreme caution. Channelling financial resources to authoritarian regimes risks strengthening them and, as a result, further restricting civic space.

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Development finance institutions should not consider restrictions on civic space as political issues outside their mandate. On the contrary, they should recognise that these restrictions constitute factors that pose serious risks to the people affected by their projects, their development objectives and their operations, and hinder compliance with their policies on participation and consultation with stakeholders.

General context: civic space restrictions

The restrictive regulations analysed in this document are not isolated measures, but part of a broader shift towards increasingly restrictive practices in civic space. They are often accompanied by other policies and behaviours that hinder the work of defending rights and increase state control over civil society and territories.

Various records compiled by civil society organisations reveal that Latin America has the highest percentage of murders of defenders, with an increase in recent years.

According to the latest report by the global organisation Front Line Defenders, 79.3% of the 324 defenders murdered in 2024 were from this region. Global Witness, meanwhile, in documenting murders of land and environmental defenders, recorded 146 murders or disappearances in 2024, 82% of which occurred in countries in the region.

The Inter-American Commission on Human Rights (IACHR) also published a report that points to not only the high number of murders and threats against defenders, but also an intensification of their criminalisation in various countries in the region.

In countries such as El Salvador, Ecuador and Peru, for example, laws to control the financing, registration and operation of organisations have been added to discourses and policies that criminalise defenders of territories, restrictions on protest and institutional reforms that limit mechanisms for democratic participation and checks and balances. In the case of El Salvador, there has been a serious weakening of democratic institutions, severe restrictions on freedom of the press and expression, and a growing criminalisation of journalists, activists and critical voices.

Organisations in the region have pointed to other worrying trends, including greater control of protests and public demonstrations through civil and criminal sanctions, the stigmatisation of journalists and sectors critical of the government, the criminalisation of legitimate expression through concepts such as hate crimes or accusations of terrorism, and an increase in the discretionary powers of the executive branch and intelligence services.

An analysis of these trends, which have been widely documented by numerous civil society organisations, is beyond the scope of this document, but it is essential to take them into account in order to properly assess the impact of the trends identified here on the work of organisations and individuals defending human rights.

Regulations affecting civil society organizations

In various Latin American countries, there has been an increase in the adoption of regulatory frameworks that regulate the registration and financing of civil society organisations in a way that restricts their work and threatens their independence.

Although transparency regarding the financing of organisations, external influence and accountability may be legitimate objectives, these reforms are part of a worrying global trend, as they involve excessive regulations aimed solely at non-profit organisations, with very broad wording that can easily be used to persecute and stigmatise dissident society.

Similar measures have been adopted in many countries (including Georgia, Kyrgyzstan and Zimbabwe), where laws on "foreign funding" or "transparency" have led to the stigmatisation, bureaucratisation or even expulsion of independent organisations. Similar regulations adopted in France and Canada have also drawn criticism from civil society organisations. In the case of France, for example, organisations have pointed out that it extends the use of a detection algorithm as an intelligence technique, which is highly repressive in nature. In Canada, the regulation has drawn criticism for its vagueness and broad scope.

In 2024, various United Nations mechanisms issued a joint statement expressing concern about the imposition of laws, policies, and procedures that unduly restrict international funding of associations and cause discriminatory interference with the exercise of the right to freedom of association.

In the region, these provisions are being used to limit the autonomy of organisations, hinder their funding and restrict their role in defending human rights. Through disproportionate registration and supervision requirements, discretionary authorisations, arbitrary sanctions and even powers to dissolve organisations, an increasingly hostile environment for freedom of association and citizen participation is being created.



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BRAZIL

Over the past decade, bills such as PL 4953/2016 and PL 736/2022 have been introduced in the Brazilian Congress, aiming to require civil society organizations to annually report funds received from abroad or from foreign entities or governments, even if received in local currency, and which provide for the imposition of sanctions such as fines and the suspension of the entities' activities.

These proposals have been criticized for being discriminatory and for **posing risks of criminalization for NGOs**, which are currently subject to rigorous oversight by the Federal Revenue Service and the Central Bank, under the same conditions as other Brazilian legal entities.

In recent years, the Brazilian landscape has been marked by **investigations targeting social movements and civil society organizations**, such as the initiative to

establish the Parliamentary Commission of Inquiry (CPI) on NGOs in 2023.

Several organizations believe that a blanket investigation of the entire sector, as was done on that occasion, is inappropriate and can undermine public trust in organizations that play a vital role in society, the economy, and democracy.

ECUADOR

On August 28, 2025, the **Social Transparency Act** went into effect with the aim of “preventing, detecting, and eradicating money laundering and the financing of crime, in all its forms.”

Known as the “Foundations Act,” several NGOs expressed their concern prior to its passage, warning that it would allow the government to automatically **dissolve organizations for purely administrative violations**, in contradiction with international standards on proportionality and due process. They also noted that the **financial and accounting obligations** outlined in the law are disproportionately complex and, in practice, **unfeasible for community-based and grassroots organizations**, risking pushing them into the informal sector or eventually forcing them to close.

These restrictions are part of a broader effort to delegitimize the work of independent organizations, with statements by President Noboa linking them, without evidence, to attempts to destabilize the country.

The implementing regulations of the law, issued by presidential decree, also prohibit foundations from participating in actions that interfere with legally authorized mining projects, directly affecting environmental and territorial organizations.

EL SALVADOR

The **Foreign Agents Act**, passed in May 2025, requires NGOs that receive foreign funding to pay a 30% tax on the funds received; they may be penalized with a fine ranging from \$100,000 to \$150,000.

Domestic and foreign organizations warn that the law aims to institutionalize the persecution of organizations. According to the Office of the UN High Commissioner for Human Rights (OHCHR), the use of vague language in the law could unduly restrict the rights to freedom of association and expression.

According to Amnesty International, one of the most concerning aspects of the legislation “is the criminalization of the right to association by penalizing actions protected by regional and international human rights law and standards.” Meanwhile, in El Salvador, the law’s impact on freedom of expression and association is already being felt. Since it went into effect, at least four organizations, including the country’s journalists’ association, have closed their offices after losing their funding. According to the journalists’ association, “the suffocating, arbitrary, and illegal conditions imposed” by the law have forced them to close.

MEXICO

In 2025, the requirements that civil society organizations with authorized donor status must meet were expanded, imposing a disproportionate bureaucratic and operational burden on civil society organizations. Likewise, in 2025, a reform to the Federal Law on the Prevention and Identification of Transactions with Illicit Funds was also approved, which was strongly criticized by civil society organizations for undermining the right to association and civic space. The regulation imposed **excessive additional burdens**, such as a training and selection program for the organization’s staff, the requirement to have an automated risk monitoring system, and the obligation to maintain an Internal Policy Manual on the matter and to audit compliance with it.



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PARAGUAY

The law establishing oversight, transparency, and accountability for nonprofit organizations—known as the “Garrote Law” or “Anti-NGO Law”—was enacted in November 2024. This legislation has sparked great concern among civil society organizations and international bodies due to the excessive control it imposes on nonprofits, particularly those working on issues of corruption, transparency, and human rights.

Although President Santiago Peña’s government presents it as a “Transparency Law” to improve coordination between the state and organizations, civil society warns that in practice, this law could create an excessive bureaucratic or operational burden for independent organizations, forcing them to choose between adapting to state control or operating informally—with the consequence of reduced transparency or even the legal disappearance of key entities in the civic sphere. One of the critical provisions is that the law allows for severe penalties or classifies the funding of activities that the state considers “political advocacy” as a “very serious offense,” which opens the door to indirect censorship of legitimate activities by NGOs that defend human rights or challenge public policies.

PERU

In April 2025, former President Dina Boluarte signed into law the Act Establishing the Peruvian Agency for International Cooperation (APCI), arguing that it would enhance transparency in the use of international funds; however, several organizations warn that it actually **jeopardizes the autonomy and very existence of civil society organizations**. The law grants the state broad powers of control, requires “prior approval” to implement projects, and classifies the use of cooperation funds to support legal actions against the state as a “very serious offense,” thereby limiting access to justice and fostering censorship and self-censorship. Furthermore, it introduces ambiguous definitions and an excessive bureaucratic burden that can be applied at the state’s discretion.

VENEZUELA

In November 2024, amid a severe escalation of repression against voices deemed critical or dissident, the Law on the Oversight, Regularization, Operations, and Financing of Non-Governmental Organizations and Similar Entities was passed.¹ Described by civil society organizations as an anti-NGO or anti-civil society law, it establishes **burdensome registration procedures** and requires the submission of detailed financial reports. Its language is vague and open to interpretation, which could lead to arbitrary harassment and intimidation by the government. Given that several articles of the law restrict the operation of NGOs for political reasons, there is concern that this legislation will be used as a pretext to silence any entity critical of the authorities.

1. The restrictive environment for public participation includes the so-called Anti-Blockade Law of 2020, which authorized the executive branch to disregard a number of existing regulations in order to counter the effects of sanctions imposed on Venezuela, thereby limiting access to information and public participation in projects.

Environmental regulations restricting citizen participation

Across the region, various governments are debating and adopting regulatory reforms that streamline the process for granting environmental permits or licenses previously required for certain projects. This is weakening environmental safeguards and protections, as well as those related to the protection of public health.

Proponents of these projects argue that the processes are excessively bureaucratic and slow, and that the goal of the reforms is not to reduce existing levels of environmental protection, but rather to establish more efficient administrative processes that facilitate the approval of projects considered strategic for various reasons. In this vein, the OECD has recommended limiting the use of licensing and permitting processes and their requirements to cases where activities cannot be effectively regulated ex post, and that they should only be applied when the potential impact is significant and irreversible.

Civil society, environmental, and human rights organizations that oppose these reforms point out that, in practice, these changes weaken environmental protection and violate the **principle of non-regression** of economic, social, and cultural rights (ESCR).

They also argue that delays in environmental licensing processes stem from **inadequate information and environmental impact assessments** provided by project proponents, or from non-compliance with regulatory requirements.

Below are some **examples of recent reforms** in countries across the region that, by modifying licensing and permitting regulations and eliminating certain requirements related to prior assessment and prevention, have reduced access to information on the environmental impacts of projects, thereby undermining citizens' opportunities for participation and oversight in environmental matters.



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ARGENTINA

In 2024, it was established that the public hearing procedure required by various laws may be supplemented or replaced by a public consultation mechanism or by whichever mechanism is technically and legally most appropriate for ensuring the best and most efficient participation of interested parties and the adoption of the relevant act.²

Although the substitution is limited to cases where other mechanisms are technically and legally more suitable, there is a risk that public hearings could be replaced at the discretion of officials with less effective mechanisms.

In the same year, regulations governing the **right of access to public information** were also amended, expanding the exceptions established by law, granting greater discretion to officials, and establishing penalties for repeated requests for information deemed to violate the principle of good faith.

An Incentive Regime for Large Investments (RIGI) was also established for large-scale projects, guaranteeing them tax, customs, and exchange rate stability for a period of 30 years; it renders provincial, municipal, or national regulations that hinder its implementation null and void; and it empowers investors to use international arbitration instead of local courts.

This preferential regime conflicts with the right of future generations to raise environmental protection standards, and by empowering investors to use **international arbitration**, it limits the ability of affected communities to access justice.

2. A public hearing is an oral meeting involving direct debate, whereas a public consultation is a written (or electronic) process for gathering opinions.



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BRASIL

In August 2025, Brazil passed Law No. 15,190, which, under the pretext of modernizing Brazilian legislation, **dismantled the environmental regulatory framework.**

Among other things, this law simplified the issuance of permits for projects with significant environmental impact—such as agribusiness and mining, which can now obtain permits based on an affidavit without prior technical analysis—and limited the involvement of agencies responsible for protecting the rights of Indigenous and Quilombola communities.

The legislation was harshly criticized by civil society organizations, which have dubbed it the “Law of Devastation,” and by experts from the United Nations, for representing a serious setback in environmental protection. Subsequently, the National Congress overturned 56 vetoes by the Presidency of the Republic on some of the law’s most harmful provisions and approved Law No. 15,300/2025, which regulates the

Special Environmental License, which may benefit projects deemed strategic by the Governing Council, establishing a maximum period of one year for licenses to be granted or denied.

Together, these two laws weaken the national environmental system, violate the principle of federalism, and subordinate environmental and climate protection to political and private interests, in addition to directly contradicting the environmental and climate commitments Brazil has made at the international level.

In December 2025, Brazilian civil society brought the debate on the constitutionality of the laws before the Federal Supreme Court. However, to date, both remain in force.

CHILE

On July 1, 2025, Chile passed the Framework Law on Sectoral Authorizations,³ also known as the “permit law,” with the aim of streamlining the sectoral authorization process for investment projects. Various environmental organizations have pointed out that, in practice, the law restricts the right of access to information and participation in environmental matters. The law replaces the processing of certain permits—considered low-risk—with an affidavit, thereby weakening preventive oversight. It also establishes tacit authorization in certain cases if the agency fails to meet the legal deadline for a response, and establishes a regulatory stability regime, protecting permit holders from regulatory changes for up to eight years.

These changes represent a step backward in the application of the precautionary and preventive principles, with implications for environmental protection and civic space, as they restrict legal tools for overseeing industrial activity.

This legislation comes on top of the amendment to the Environmental Impact Assessment System Regulations in 2025, which lowered environmental protection standards, allowing certain projects—such as those involving the mass storage of hydrogen or other hazardous materials below a certain threshold—to bypass assessment, even though they pose numerous risks to local communities.

EL SALVADOR

In December 2024, the General Law on Metal Mining was enacted, lifting the total ban on metal mining that had been established in 2017, following years of social mobilization and consultations. The State was granted exclusive authority over the exploration and exploitation of mineral resources. The law authorizes previously prohibited metal mining and does not require prior community consultations or the conduct of prior environmental impact studies.

In October 2025, the Legislative Assembly amended the Law Establishing the Directorate of Land Use Planning and Construction, with the aim of streamlining procedures. This reform, along with the passage of the Mining Act in December 2024, centralizes the processing of applications for land-use changes and tree-cutting permits within the Directorate of Land Use Planning and Construction, eliminating the need to obtain permits from the Ministry of the Environment and Natural Resources.

3. The draft Framework Law on Sectoral Authorizations focuses on the sectoral permits issued by the OAECAs (State Administrative Agencies with Environmental Jurisdiction). Although environmental permits are explicitly excluded from this regulation—and continue to be governed by Law No. 19,300 and the SEIA—debate persists as to whether this reform could have indirect effects on evaluation processes.

MEXICO

In November 2021, a presidential decree was issued declaring megaprojects in numerous sectors to be in the public interest and a matter of national security, as well as those that, due to their purpose, characteristics, nature, complexity, and scale, are considered a priority and/or strategic for national development. The relevant agencies were instructed to issue provisional authorizations within a maximum of five days, valid for at least 12 months. This decree facilitated the approval of major projects, such as the so-called “Mayan Train” and the “Isoceanic Corridor of the Isthmus of Tehuantepec,” among others.

Furthermore, by failing to follow the constitutional procedure governing the suspension or restriction of rights and guarantees in serious cases—and by limiting rights that could not even be suspended in such cases—the directive to grant authorizations within the specified timeframes rendered the right of access to information, the right to participation, and public consultations meaningless. In 2025, the reform of the Law on Public Works and Related Services established that its bidding, contracting, and oversight procedures do not apply to works and services under priority programs carried out by the armed forces.

PERU

In December 2024, the Peruvian Congress approved an amendment to the Forestry and Wildlife Law, which was strongly criticized by civil society organizations for promoting and legalizing deforestation.

The law exempts landowners or holders who have deforested land from submitting a soil classification study for agricultural purposes, which facilitates the approval of agricultural activities without the necessary information to determine whether such activities are compatible with soil conditions and constitute sustainable use. The requirement to request authorization for a change in land use from the Forestry Service has also been eliminated for private properties where “established” agricultural and livestock activities already exist.



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Conclusions

The trends identified are shrinking civic space and undermining compliance with the banks' participation policies. Multilateral development banks have **policies that require the free participation of stakeholders**, the provision of information on project impacts, and, in the case of projects affecting Indigenous Peoples, free, prior, and informed consent.

However, when civic space is restricted by regulations that hinder participation and the right of access to information, affected communities, human rights defenders, and civil society groups cannot express their opinions freely and safely, which prevents development banks from complying with their own requirements for stakeholder participation and consultation and for free, prior, and informed consent.

Restrictions on civic space, such as those identified, hinder the participation of affected individuals, advocates, and organizations; as a result, they also make it difficult for development banks to fulfill their mission and achieve their development goals.

An open civic space ensures that development projects are more inclusive, safer, and tailored to the needs of marginalized communities, thereby achieving a greater positive impact; it also facilitates more effective oversight of resource allocation, which helps strengthen transparency and ensure accountability in development projects.

Instead, a restricted civic space limits civil society's ability to identify potential negative environmental and social impacts of projects and to define measures to prevent or mitigate such impacts. Furthermore, restrictions can limit or prevent civil society from monitoring development activities, hindering transparency, the analysis of information of public interest, and accountability in the use of resources. The lack of information and scrutiny regarding development projects also erodes public trust and increases social tensions.

Recommendations

Taken together, these **regulatory and policy trends** create a regional landscape in which public participation is increasingly restricted, directly affecting democratic quality and the ability to design and implement development projects in a legitimate, informed, and human rights-respecting manner. Restrictions on civic space not only violate international obligations but also pose significant risks to investment sustainability, conflict prevention, and the protection of affected communities. Against this backdrop, it is essential that development banks explicitly recognize that operating in contexts of shrinking civic space compromises the integrity and outcomes of their operations, and adopt concrete measures to prevent, mitigate, and respond to these risks.

Civil society groups working in countries with restricted civic space hold **divergent views** on whether development banks should invest in such contexts or on how banks should or should not use their influence to open up civic space. Some believe that banks should **categorically avoid any investment in countries with restricted civic space**, given the lack of accountability, the inability to ensure the participation of affected people, the risks that projects may pose to local actors, and the fact that their investments may further legitimize autocratic regimes. Others believe that these organizations' influence can be used to promote the opening of civic space. Some also believe that the banks are tools serving the geopolitical interests of their major shareholders, and that for this reason their influence on public affairs in different countries is cause for concern and should not be encouraged.

Views also vary on what types of projects should be supported in restrictive contexts, how banks could exercise their influence, what safeguards they should implement, and how they should ensure accountability.

Beyond these differing perspectives, civil society groups operating in restrictive contexts frequently highlight the need for development banks to be **extremely cautious** when channeling financial resources to authoritarian regimes.

Below are a series of recommendations developed by various organizations and included in the report “Financing Repression,” aimed at strengthening due diligence, aligning investments with international standards, and ensuring that their actions contribute to expanding—rather than restricting—the exercise of the right to participation in the region.

1. Promote an open civic space

- Recognize that an **open civic space** is a fundamental prerequisite for achieving the Sustainable Development Goals, and consistently reiterate this to their shareholders and stakeholders.
- Establish clear objectives and **specific indicators related to civic space**, creating incentives for governments to uphold civic freedoms and fundamental rights.
- Establish **procedures on how they will promote an enabling environment** for civil society and advocate for governments to remove restrictions on civic space.
- Ensure **compliance with the commitments** set forth in the Escazú Agreement and international human rights treaties, guaranteeing mechanisms for citizen participation, access to information, and specific protection protocols for human rights defenders in environmental matters.
- **Lead by example**, establishing best practices in collaboration with civil society and facilitating safe and meaningful dialogues among various stakeholders, while promoting women's participation in collective decision-making.
- Support **capacity-building activities** to strengthen the resilience of civil society in the countries where they operate
- Provide **systematic training** to public and private clients on the meaningful participation of rights holders, as well as policy advice to create an enabling environment for civil society.
- Promote the development of **international and national standards** that support civic space and protect human rights defenders, in line with international human rights law (including, for example, legislation against strategic lawsuits against public participation, or SLAPP).
- Foster **collaboration among multilateral and bilateral development financial institutions** when they participate in global and regional standard-setting processes related to civic space issues, in line with the United Nations Guiding Principles on Business and Human Rights.

2. Carry out a contextual risk analysis

- Recognize that restrictions on civic space represent an **operational risk**.
- Define **consistent indicators** to assess these risks in all countries.
- Conduct a **comprehensive contextual risk analysis** that assesses the impact of restrictions on civic space prior to project approval, as part of a comprehensive human rights due diligence process.
- Conduct differentiated analyses of the risks and obstacles to the participation of **women** defenders.
- Incorporate **human rights and civic space assessments** into country-level partnership frameworks or strategies.
- Ensure **continuous monitoring and institutional learning** regarding how the bank assesses and addresses civic space analysis.

3. Minimum requirements and exclusion list

- Establish **minimum standards** and requirements regarding civic space, the protection of basic human rights, and transparency that governments must meet in order to access financial or technical support from development banks.
- Exclude **high-risk projects** and those implemented through financial intermediaries in countries where civic space is restricted.
- Implement mechanisms for **independent monitoring and apply enhanced due diligence** to projects involving public or private security forces, ensuring that any use of force complies with the standards set forth in the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials.
- In consultation with civil society organizations, establish additional requirements and/or **exclusion lists**. For example, development banks should temporarily or permanently suspend financing for projects where there are credible reports of reprisals against human rights defenders.

4. Transparency and accountability

- Ensure the **highest levels of transparency and proactive disclosure** of information regarding all activities supported by development banks (including multinational projects), in line with international human rights standards on access to information. This should include information on the project (e.g., investment amount, allocation of funds, risk assessments, approval documents, and monitoring and evaluation reports), the safeguards and measures adopted to mitigate potential risks, as well as the mechanisms available for affected persons to raise concerns or file complaints in the event of harm.
- Ensure that information is **accessible** and available in local languages.
- Commit to ensuring **redress mechanisms** in cases of non-compliance with stakeholder participation requirements.

5. Participation

- Strengthen **environmental and social safeguards** to ensure meaningful participation by rights holders and stakeholders at the project level.
- Establish **procedures to proactively prevent potential reprisals**, address them when they occur, ensure redress, and demonstrate best practices in implementing non-repetition measures when such situations are reported to bank staff, consultants, and/or management.
- Conduct effective **monitoring of civil society engagement** at the country and project levels, assessing its contribution to an enabling environment for public participation in decision-making.
- In the case of **Indigenous peoples** and local communities, adopt the standard of Free, Prior, and Informed Consent (FPIC), moving beyond generic consultation models, in compliance with the Escazú Agreement and Convention 169 of the International Labour Organization (ILO).