

April 2, 2026
World Bank Group Executive Directors
1818 H Street, NW Washington, DC 20433

Dear Executive Directors,

We are writing with questions about the recent approval for the Dorjilung Hydroelectric Power Project (DHPP) Investment Project Financing in Bhutan. We are representatives of civil society organizations who advocate for the World Bank Group to adhere to its environmental and social policies and who support effective accountability mechanisms at development finance institutions. We saw with interest the World Bank Group's announcements about the DHPP project as emblematic of the Bank's new "One World Bank Approach."¹ Our subsequent review of documents related to the project raised questions that we are asking for your assistance in addressing. We are asking questions because we want to ensure that all projects—especially Category A ones—under the One World Bank Approach adhere to strong safeguards and are accountable to local communities.

Questions:

1. Will both the IFC's Sustainability Framework and the World Bank's Environmental and Social Framework be applied to this project?
2. We read the Chair Summary from January 26, 2026, which referred to a waiver of a clause in the 2025 Accountability Mechanism Resolution.² This raises the following questions:
 - a. Can you explain what that waiver means?
 - b. Can impacted community members raise concerns to both the Compliance Advisor/Ombudsman (CAO) and the World Bank Accountability Mechanism for this jointly financed project?

¹ [World Bank Group Supports Sustainable Hydropower Development in Bhutan with Innovative Financing Package; Bhutan's Dorjilung Hydroelectric Power Project Gets World Bank Financing | Imad N. Fakhoury posted on the topic | LinkedIn](#); See also, [World Bank Group Approves Long Term Financing for 1,125 MW Dorjilung Hydropower Project in Bhutan Co-Owned by Tata Power and DGPC](#); The 2025 Bhutan Country Partnership Framework also discusses the DHPP project and the World Bank Group's One WBG approach to financing in Bhutan, <https://thedocs.worldbank.org/en/doc/e67a3a6f6e9832e4d089e31cdc9b134f-0310012025/original/CPF-Bhutan-10May25-outlined-compressed-1.pdf>.

² The Chair Summary states: "Directors also approved, only in respect of the IFC loan, the waiver of paragraph 15(c)(ii) of the 2025 Accountability Mechanism Resolution, which sets the limit for the eligibility period of Requests for inspection at no more than fifteen months after Closing Date, to enable complaints to be submitted beyond that period until such time as IFC exits or the IFC loan is repaid." <https://documents1.worldbank.org/curated/en/099012326170071226/pdf/BOSIB-d45ca652-31b9-4a09-8c74-6726a6a5274e.pdf>. We also saw reference to this decision in the Task Force on Integration of the World Bank Group Independent Accountability Mechanisms Draft Report for Public Consultation ("For that project, Board deliberation led to a "one-off approach to accountability" where the Board chose the IPN as the operative IAM, and modified the eligibility of complaints to allow CAO's longer timeline of eligibility, while noting that this decision did not set a precedent.")

- c. The IFC's accountability is governed by the CAO, not the World Bank's Accountability Mechanism. Why is the Board seemingly applying the World Bank's Accountability Mechanism Resolution to an IFC loan?³
3. Did the Board or Management waive the application of any other environmental, social, or accountability policies or practices?
4. Does the IFC's Remedial Action Framework apply to this project?
5. Do the IFC's Responsible Exit Principles apply to this project?
6. We further read that Tata Power is the client. What steps did the Board and Management take to ensure that harm stemming from prior projects with Tata⁴ will not occur in this new project? Did the Board discuss with Management whether they took into account particular learnings from the Tata Mundra case? Did Management agree to any particular actions to prevent harm?

We expect and hope to see early projects under the new "One World Bank Approach" set a precedent of applying and upholding all environmental and social standards and policies, preserving access to accountability mechanisms, and aiming for the highest degree of transparency and meaningful engagement with stakeholders.

Thank you for helping us better understand this flagship project. We would appreciate a meeting to discuss and would welcome written responses to our specific questions above. Thank you.

Sincerely,

Accountability Counsel

Action Paysanne Contre la Faim

Alternative Law Collective (ALC)

Arab Watch Coalition

Asian Forum for Human Rights and Development (FORUM-ASIA)

Bank Information Center

Both ENDS

Buliisa initiative for rural development organisation (BIRUDO)

CEE Bankwatch Network

Conseil Regional des Organisations Non Gouvernementales de Développement

Green Advocates

Inclusive Development International

Inisiasi Masyarakat Adat (IMA)

International Accountability Project

³ Given that the Taskforce on the Integration of World Bank Group Accountability Mechanisms has not yet completed its work, we have concerns about premature changes to the World Bank Group's accountability framework.

⁴ Several Tata projects have caused harm to local communities and the environment, and many of these harms remain unremedied. This list includes the [Tata Mundra Ultra Mega Project](#) and [Tata Tea](#).

International Rivers
INWOLAG
Jamaa Resource Initiatives
MiningWatch Canada
Peace Point Development Foundation-PPDF
Recourse
Urgewald

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