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11. Contested terrain: World Bank projects and participatory development

Jonathan Fox

INTRODUCTION¹

Analysts have long debated whether large international development agencies can promote participatory development. Numerous top-down, governmental or international aid attempts to enable the participation of the poor in project decision-making tend to result in elite capture and the diversion of benefits away from the poor (e.g., Mansuri and Rao 2013; Cooke and Kothari 2001). In practice, optimistic project designs that claim to take stakeholder views into account are transformed as they pass through layers of aid bureaucracies, national government agencies and local power brokers. Numerous studies spell out how large-scale development projects that claim to be designed to reduce poverty end up reproducing social exclusion (e.g., Fox and Brown 1998; Fox 2007; Li 2007). Meanwhile, some of the same large development agencies that have long claimed a discourse of participatory development are also associated with promoting socially and environmentally costly development projects and policies – most notably the World Bank. Yet in contrast to what one might expect from well-deserved headlines about the World Bank’s development disasters, at the same time, for decades the agency has also been a leading agenda-setter in the mainstream wing of the field of participatory development (e.g., Alsop, Bertelson and Holland 2006; Cernea 1983, 1992; Narayan 1995, 2005).

Dating back to the 1970s, the idea of participatory development is based on the proposition that development projects and policies intended to reduce poverty are more likely to be successful and sustainable if they include the poor and socially excluded in decision-making (e.g., Cornwall 2002; Hickey and Mohan 2005; Gaventa and Barrett 2012). This process is distinct from the widespread official development agency practice of contracting out service provision to non-governmental organizations (NGOs) (e.g., Covey 1998; Nelson 1995). Participatory development is also distinct from international NGO advocacy that questions the social and environmental costs of World Bank projects (e.g., Fox and Brown 1998; Rich 2013). In contrast to relatively short-term project evaluations, this study takes a long view to analyze the long-term effects of five innovative projects that date from the 1990s, to determine whether and how they contributed to institutionalized increased voice and representation for the socially excluded in development decision-making.

Analysts of participatory development often recognize the risks of setbacks, as well as the possibility that what makes participation work at micro levels tends to get significantly watered down in the process of institutionalized scaling up (e.g., Hickey and Mohan 2004, 2005). Yet it is precisely the allure of scale – the prospect of opening civic and social space for large numbers of excluded people to have more autonomous voice and influence in governance – that leads advocates of participatory development within development agencies to keep trying. However, promoting participation ‘at scale’ can be understood in diverse ways. The

most common repertoire for official participatory development, including what is currently called social accountability, is often limited to pro forma consultations whose under-informed, micro-level deliberations can be easily controlled, captured or ignored by authorities. Whether such limited convenings involve participatory rural appraisals, community interface meetings with frontline service providers or national technical meetings with capital city civil society organizations, they usually involve some voice but little tangible institutional response (Fox 2015). More recently, tick-the-box approaches to stakeholder engagement involve official grievance redress mechanisms that often do not manage to redress grievances (Pande and Hossain 2022; Pfiel and Agarwal 2021). Nevertheless, beginning with internal advocacy by a World Bank staff mutual support group in the early 1990s, the ostensibly participatory share of its investment portfolio has grown from a few outliers to vast, long-term portfolios involving many billions of dollars – most notably under the rubric of ‘community-driven development’.²

FROM PARTICIPATORY DEVELOPMENT TO STAKEHOLDER ENGAGEMENT

In the 1990s – in direct response to transnational NGO advocacy campaigns – the World Bank launched precedent-setting policies that combined mandatory minimum social and environmental standards with public information and accountability reforms (Fox and Brown 1998; Wade 1997). Advocates focused on high profile ‘problem projects’, revealing system failures that were very costly both to affected communities and the Bank’s public image. These campaigns often combined international advocacy networks (e.g., indigenous rights, environmental protection) with national policy reform coalitions (Brown and Fox 1998). These policies’ damage control focus led them to be called ‘safeguards’.³ Their implementation in practice was uneven and incomplete (Fox and Brown 1998; World Bank 2010).⁴ Insider reformers committed to policy compliance were sometimes empowered by external pressure, leading to internal conflict (Fox 1998). Critics of the safeguards questioned their costs, though their claim cited a study of due diligence measures that also included (more expensive) anti-corruption provisions (Mallaby 2006). The safeguard policies nevertheless created a set of institutional entry points that allowed subsequent civil society campaigns to question, change and sometimes even block socially and environmentally damaging projects.⁵

During the 1990s, while the new safeguard policies ostensibly raised the ‘floor’ with minimum socio-environmental standards, a small number of World Bank projects also attempted to raise the ‘ceiling’ by creating more space for public participation (e.g., Bebbington et al. 2004, 2006; Miller-Adams 1999; Thorne 1998; World Bank 2001). A small but persistent faction composed mainly of what the World Bank has called ‘non-economist social scientists’ advocated for the implementation of these reforms (e.g., Bhatnagar 1992).

The World Bank’s evaluation department carried out an internal process review of the participation agenda in a random sample of investment projects in the 1990s (World Bank 2001).⁶ The study found that participation was ‘limited to only small parts of projects, too rushed or superficial, or has been too ineffective to make much difference’ (World Bank 2001: vi). Long-term impact on institutions was considered unlikely because ‘participation usually involved an enclave within the community, project, or government – partly because Bank-assisted projects often bypassed existing processes or organizations’ (World Bank 2001: vi–vii). A comprehensive World Bank evidence review carried out more than a decade later

came to similar conclusions, emphasizing the risk of elite capture within ostensibly participatory projects (Mansuri and Rao 2013).

Also in the late 1990s, an independent study addressed whether and how 10 World Bank projects put the pro-participation elements of the ostensibly mandatory social-environmental safeguard policies into practice. Substantive openings were rare and partial – even in two countries with some degree of civic space (Fox and Gershman 2000). Progress was possible where three factors converged: (1) internal World Bank staff champions, willing to invest their own political capital, managed to control project design and substantially implement safeguard policies involving environmental assessment, indigenous peoples and public access to information; (2) project design targeted support specifically to government agencies already under the control of reformist policymakers; and (3) projects focused on regions where social constituencies already had some degree of representation and voice (Fox and Gershman 2000).

Fast forward almost two decades and the World Bank's Citizen Engagement Framework committed to build 'beneficiary feedback' mechanisms into *all* new investment projects (World Bank 2014b). On a parallel track, its revised 2016 Environment and Social Framework mandated relevant standards for 'stakeholder engagement and information disclosure'.⁷ Both internal and external observers expected that these official commitments to enable participation would be watered down, turned into a 'tick-the-box' exercise, dominated by belated, pro forma customer satisfaction surveys, controlled consultation meetings that do not permit informed decisions, feedback loops that never close and inoperative grievance redress mechanisms. These are indeed likely outcomes, insofar as the World Bank's clients are governments and internal staff incentives still prioritize the infamous 'pressure to lend' over the quality and impact of investments, according to its own evaluations (Portfolio Management Task Force 1992; World Bank 2014a). An official evaluation of the 'Citizen Engagement' framework found both ambitious combinations of multiple pro-participation commitments that it described as 'thick' and minimalist 'thin' approaches (World Bank 2018). An independent academic review concurred, finding a substantial fraction of recent World Bank-funded projects that commit, at least at the design stage, to multiple measures to create space for citizen action (Nadelman, Le and Sah 2019). A subsequent external survey of the Bank staff charged with putting citizen engagement commitments into practice found that their enabling institutional environment was thin, confirming related earlier internal staff survey findings (Nadelman 2021; Mansuri and Rao 2013). This persistent pattern of mixed results underscores the relevance of distinguishing between superficial openings for participation versus tangible, targeted actions to enable power shifts – which is the main focus of the following comparative case analysis.

Research Strategy and Case Selection Criteria

The broad framing question here is: How can official aid agencies contribute to enabling countervailing power that survives the end of the project? Analysts distinguish between top-down initiatives that attempt to mobilize the poor directly, versus indirect institutional changes that bolster the enabling environment for collective action (Joshi and Moore 2000), and this study addresses both. The methodology combines positive outlier identification, the comparative method and within-case process tracing to identify the mechanisms, causal pathways and long-term outcomes.

World Bank projects selected share the following characteristics: participatory innovation (according to contemporary practitioner reports), fragile/conflict settings, similar time period and the availability of an independent evidence base. Each of these World Bank projects was either designed in response to civil society advocacy or was led by a staffer who self-identified as pro-participation – based on previous research that confirmed the relevance of these path-dependent factors (Fox and Brown 1998; Fox and Gershman 2000).

This study is informed by the positive deviance approach, which addresses ‘outliers who succeed against the odds’ (Green 2016: 25). Such anomalies can reveal possible pathways of change that would otherwise be hidden by dominant trends or rendered invisible by averages. The positive outlier approach is especially appropriate for analyzing ambitious change initiatives in inhospitable settings – as in the case of efforts to overcome extreme gender, racial, ethnic and class exclusion. For the socially excluded, even limited increases in their capacity for influence may represent significant steps forward – while being difficult to assess externally in any consistent way. This underscores the methodological challenge of determining which is which – elite capture vs limited yet still meaningful power shifts for the excluded. Results on the ground are often mixed, but what is the nature of that mix? This ambiguity suggests the relevance of looking for outliers on two levels – first, to identify exceptionally pro-participation openings to begin with, and second, to look for exceptional spaces within those openings that manage to resist elite diversion or capture of project benefits.

Case Analysis

This study analyzed five World Bank projects from the 1990s that attempted unusually ambitious pro-participation elements, in the view of both insider and outside analysts at the time (Table 11.1).⁸ Evidence sources combine official documents, interviews with participants, as well as independent scholarly and applied research. These projects included:

- Mexico (1991–1995) \$350 million Decentralization and Regional Development project – Participatory municipal social funds with targeting created new entitlements for villages to propose local infrastructure projects.
- Brazil (1992–2002) \$167 million Rondônia Natural Resource Management Project (Planaflores) – Funding for civil society organizations, smallholder associations, land use zoning and demarcation of indigenous territories.
- Colombia (1994–2001) \$39 million Natural Resources Management Project – Funding for large-scale collective titling of Afro-descendant and indigenous territories, plus regional oversight by ethnic organizations in the Pacific coast region following new rights in 1991 Constitution.
- Indonesia (1998–2002) \$253 million Kecamatan Development Program (KDP) – Funding for participatory social investments with accountability processes, plus public media oversight following political opening.
- Ecuador (1998–2002) \$25 million Indigenous and Afro-Ecuadorian Peoples Development Project – Project co-designed and co-managed with national indigenous organizations in response to protest, including substantial funding of second-level membership groups.

Table 11.1 *World Bank project cases (1991–2002)*

Country	WB Project	Key project contribution to political opportunity for countervailing power	Enabling factor that allowed WB staff to encourage opening	Country context
Mexico (1991–1995)	Decentralization and Regional Development (\$350 m)	Participatory municipal social funds, including new entitlements for outlying villages	Project manager identified with WB participatory development	<i>Subnational:</i> Authoritarian, violent & conflict (Guerrero 1994 Chiapas rebellion). <i>National:</i> Government legitimacy weakened by 1988 electoral fraud
Brazil (1992–2002)	Rondônia Natural Resource Management Project (Planafloro) (\$167 m)	Funding for land use zoning, including for smallholder associations & demarcation of indigenous territories & rubber-tapper extractive reserves	Project designed in direct response to international advocacy campaign	<i>Subnational:</i> Fragile and violent region (frontier Amazonian state) <i>National:</i> Recent transition to democracy, new constitution
Colombia (1994–2001)	Natural Resources Management Project (\$39 m)	Strengthening of nascent environmental agencies & funding for large-scale collective titling of Afro-descendant & indigenous territories, plus regional oversight by ethnic organizations in the Pacific coast region	Project influenced by insider WB environmental & ethnic rights advocates	<i>Subnational:</i> Fragile and conflictive region (Pacific). <i>National:</i> New 1991 Constitution created democratic opening and ethnic rights provisions encouraged community organizing to promote implementation
Indonesia (1998–2002)	Kecamatan Development Program (\$253 m)	Funding for participatory social investments with accountability processes, plus public media oversight	Project manager was advocate of participation and public accountability	<i>Subnational:</i> Project areas included conflict & post-conflict regions (e.g., Aceh, Sulawesi, Maluku, Borneo) <i>National:</i> Project coincided with 1999 fall of authoritarian regime
Ecuador (1998–2002)	Indigenous and Afro-Ecuadorian Peoples Development Project (Prodepine) (\$25 m)	Project co-designed & co-managed with national indigenous organizations, to fund second-level groups	Project designed in response to indigenous protest & influenced by insider WB ethnic rights advocates	<i>Subnational:</i> Primary focus on indigenous highlands, also Amazon & Afro-descendant coastal region) <i>National:</i> Mass indigenous protest waves in 1990 & 1994, fragile regime (one coup, six presidents between 1997–2005)

Source: Fox (2020).

Comparative Analysis

Process tracing in each case: (1) identified tangible institutional mechanisms that addressed countervailing power; (2) subsequent processes of contestation; and (3) mixed results, within the limits of the available retrospective evidence. The following section identifies nine patterns. Some of these findings address specific mechanisms that were considered to be key at the time, such as power-sharing over allocation of social funds, while others involve enabling measures that were later recognized as important, such as proactive disclosure of project information and grievance redress in the emerging practitioner ‘field’ of transparency, participation and accountability (Table 11.2).

1. Projects engaged with new national political openings while targeting excluded constituencies

In each case, political changes in national context created civic space, most notably transitions to democracy, new constitutions or waves of protest. Yet those openings in national capitals were necessary but far from sufficient to drive changes within the state that could reach subnational, often peripheral regions. Each project also deployed tangible institutional measures that reached specific excluded social constituencies, often in targeted territories.⁹

2. Where projects contributed to countervailing power, they deployed two principal mechanisms

Countervailing power refers to the capacity to push back, in the sense of checks and balances.¹⁰ The project actions that were relevant to countervailing power fell into two main categories: (1) institutionalized power-sharing over allocation of social funds; and (2) direct support for scaled-up representative social organizations – including funding, recognition of legitimacy and, perhaps most importantly, collective titling of rural territories. Both kinds of measures are significantly more ambitious than conventional ‘light touch’ approaches to participatory development (e.g., Fox 2015). Yet significant project innovations to share power with stakeholders over funding decisions were often based on rules rather than laws, which left them vulnerable to rollback.

3. Power-sharing over social fund decision-making operated at different scales

Projects supported power-sharing with social leaders in allocation of government social funds at multiple scales: at the national level in Ecuador, state level in Brazil’s Rondônia, subdistrict level in Indonesia and municipal/submunicipal level in Mexico. Where these initiatives opened up budget decision-making in existing local governments to communities, as in Indonesia and Mexico, they constituted participatory budgeting with lasting potential – in contrast to power-sharing funding bodies that were limited to project-dependent institutional enclaves in the Brazil and Ecuador projects. Indeed, in Brazil, while the project allowed for civil society participation in identifying local social investments, it also allowed an anti-participation governor to claim political credit for them.

4. Countervailing power was manifested in meso-level autonomous social organizations and bolstered by collective titling of ethnic territories

The findings suggest that scaled-up, autonomous social organizations are especially relevant for exercising voice effectively in resource allocation decision-making processes, because of their potential to monitor patterns of government actions beyond the micro-level.¹¹ Where externally supported government programs provided direct support for scaled-up, autonomous, representative social organizations, they did so in three ways. Two were tangible – direct funding and collective ethnically based titling to consolidate their land base. The third was intangible – public recognition of their legitimacy as interlocutors vis-à-vis the state. In Colombia, Brazil and in Ecuador, projects supported scaled-up, multi-level grassroots membership organizations. Most notably in Colombia and Brazil, this form of organization was in turn grounded in collective titling of ethnic territories (e.g., Quiñones, Rosen and Fox 2022). Scaled-up social organizations were necessary – though not sufficient – to defend those landholdings against multiple threats, especially in the absence of reliable law enforcement. Meso-level regional social organizations constitute forms of countervailing power both because they have more bargaining power with governmental or private sector elites than do community-level organizations, and because of their potential capacity to hold allied political organizations accountable (such as national confederations).¹² This relationship between scale and countervailing power contrasts with the conventional framing of participatory development as primarily ‘local’ – a vague concept that renders invisible meso levels of scale.

5. Projects took substantial actions for ethnic inclusion, but not for gender inclusion

Projects in Ecuador, Colombia and Brazil supported unprecedented ethnic inclusion measures, while the Mexico project’s measures had contradictory outcomes depending on context. The Mexico project targeted large-scale funding to rural local governments in low-income states with large indigenous populations. Because of variation in local municipal institutions across states, the same project (and national policy) supported meaningful community participation in one state and violent boss rule in another – Oaxaca vs Chiapas (Fox 1997, 2007). Even in the state of Oaxaca, where most Mexican indigenous community governance institutions were participatory, they were often male-dominated. Only KDP in Indonesia took measures to enable countervailing power with proactive gender inclusion, with both project rules and targeted support for what is now a national association of women-headed families (Table 11.2).

6. Participatory project innovations were made possible by national openings, but unfolded in regions where social actors lacked strong national political allies

Ambitious project design was clearly enabled when architects ‘caught the wave’ of a political opening – as in Colombia, Indonesia and Ecuador – an approach now known in the development aid community as ‘Thinking and Working Politically’. In Colombia, for example, a then-new national law allowed World Bank officials to require that the loan support collective titling of Afro-Colombian and indigenous territories. Yet national allies within the state were usually still too weak to proactively *weaken* forces opposed to participation and accountability. Rare exceptions included World Bank project managers’ support for ethnic rights advocates’ calls for the removal of Colombian agrarian officials who blocked collective land titling, as well as funding cutoffs in Indonesian subdistricts identified as high corruption. These findings concur with Mansuri and Rao’s evidence review regarding the need for proactive central government oversight of participatory development initiatives, including robust transparency and accountability measures to offset powerful tendencies toward elite capture

(2013: 287). Those key features were missing in four of the five projects, constraining their long-term impact – KDP is the exception (Table 11.2).

7. The enabling potential of official participatory spaces was constrained by the lack of complementary transparency and accountability reforms

These projects from the 1990s predated the subsequent rise of the international transparency and accountability agenda. Only the Indonesia social funds proactively emphasized the consistent application of new transparency and accountability rules for project decisions, as well as multiple anti-corruption measures and a functioning grievance redress mechanism. In the Brazil, Colombia and Ecuador cases, contestation over the projects did trigger significant Bank-led mid-term reviews that were made public and strengthened the hand of both pro-participation policymakers and advocates. All the projects also commissioned either evaluations or research whose findings eventually became public. Yet none of the projects emphasized proactive public disclosure of relevant, comparable, disaggregated and actionable information about project performance.¹³

8. The enabling potential of official participatory spaces was constrained by the lack of complementary human rights protections against reprisals

At the time of these projects, international donors did not proactively address the rule of law. More specifically, none of the projects proactively invested in protections to address possible threats of reprisals. Yet in these project settings, vocal advocates of pro-poor power shifts could risk their lives for questioning authority or exposing corruption. World Bank policies and projects still steer clear of proactive measures to address closing civic space and protect human rights (e.g., Donaldson, Gallagher and Nadelman 2022).

9. Ostensibly participatory project-related institutions were the *targets* of protest and advocacy, with diverse official responses

The most extreme case of protest against project-backed institutions was in Chiapas, where the Zapatista rebellion exposed (World Bank-funded) municipal governments as tools of authoritarian elites. In Ecuador, the project itself was a concession to indigenous mass protest, followed by contestation over the terms of indigenous representation in its co-governance. The Brazil project was also a concession to an international advocacy campaign, followed by broken promises for inclusion that led advocates to make official accountability claims. In Indonesia, rural social movements were rare and the project addressed grassroots claims that fit within its focus on local social investments. The project with the clearest proactive contribution to countervailing power was in Colombia, where pressure from both above and below converged to push through large-scale titling of ethnic territories. They continue to be bulwarks of autonomous, scaled-up community representation today.

CONCLUSION

This study compared unlikely cases of change in inhospitable settings. The evidence review assessed whether and how World Bank-funded projects bolstered contextually specific, robust forms of participatory development – as well as whether such changes survived the

Table 11.2 *Tangible, targeted political opportunities that contributed to countervailing power*

Targeted institutional changes during project period:	WORLD BANK PROJECTS				
	Mexico DRD	Brazil Planaflore	Colombia NRMP	Indonesia KDP	Ecuador Prodepine
Institutionalized co-governance of social funds					
New policies mandate state-society power sharing over local government social funds					
New policies establish state-society power sharing over social funds at subnational or national levels					
State-society power-sharing over social funds is institutionalized in new laws					
Direct support for social organizations of the excluded					
Substantial funding for autonomous, scaled-up membership organizations					
Collective titling of land or territory at scale					
Enabling institutional changes: Transparency, participation and accountability					
Proactive measures for gender inclusion					
Proactive measures for ethnic inclusion					
Grievance redress mechanism that redressed grievances					
Open government & accountability measures implemented					
Proactive governmental anti-corruption measures					
Public disclosure of project evaluations, third-party research or media coverage					
Tangible official to defend human rights and to reduce risks of violent reprisals					

Note: Degree of shading represents degree of intensity.

Source: Fox (2020).

test of time. All five anomalous projects did enable collective action from below, though in partial and uneven ways. Over the longer term, their most ambitious power-shifting elements were either reversed (Mexico, Brazil, Ecuador), watered down (Indonesia) or contained (Colombia). Yet these differences mattered for social actors on the ground. For autonomous social organizations there is a major difference between rollback on the one hand and containment of progress on the other.

Scaled-up autonomous mass organizations, especially those grounded in collective land-holdings, appear to have been more sustainable than attempts to change rules to democratize decision-making about allocating social funds. Most relevant power-sharing measures for allocating social funds were not institutionalized and were therefore especially vulnerable to rollback, while few accountability reforms bolstered the public sector's capacity to respond effectively to voice. The most widely shared form of progress involved ethnic inclusion to bolster representative social organizations, as in Colombia. KDP in Indonesia stands out because it deployed the most comprehensive combination of governmental mechanisms to create space for bolstering community voice and oversight, albeit bounded to allocating local social funds. This historical evidence shows that World Bank projects can include targeted openings that can bolster contextually specific forms of countervailing power. At the same time, outcomes were always mixed – and sometimes contradictory (as in Mexico). Forces opposed to participatory development managed to reverse, block or contain the most significant innovations.

The potential for capture, reversal and contradictory outcomes underscores the centrality of first-do-no-harm principles. Those standards require real-time, independent monitoring that can identify and measure *both* countervailing power and elite capture. Timely, targeted public disclosure of relevant, actionable information to stakeholders, in their own languages, would be a step in that direction.

NOTES

1. This chapter is a revised and substantially abridged version of Fox (2020), which includes much more empirical and methodological detail (reproduced here with permission).
2. Measuring the size of the World Bank's CDD portfolio is challenging. The World Bank's tracking methodology counts the entire loan amount of large projects as ostensibly participatory even if only a tiny fraction of a loan is relevant, leading to an overstatement of the total amount (e.g., Mansuri and Rao 2013: 1). That said, the CDD portfolio is still very substantial, including sustained, large-scale lending programs – as in the cases of KDP in Indonesia and Municipal Funds in Mexico (discussed below), as well as Kalahi in the Philippines (Aceron 2022). In addition to CDD, the Bank has also funded large-scale funding for participatory approaches in sectors, as in the cases of community forestry in Mexico (Fox and Gershman 2000) and HIV policy in Brazil (Rich 2019).
3. For the World Bank's recently revised Environmental and Social Framework, including a new commitment to 'stakeholder engagement', see: <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework> (Accessed: 8 July 2024).
4. Weaver refers to this distance between official discourse and practice as the 'hypocrisy trap' (2008).
5. The advocacy campaigns also led the World Bank to create a precedent-setting, public-facing Inspection Panel, a semi-autonomous investigative body that responds to requests from affected people to document and spotlight the World Bank's violations of its own policies (Clark, Fox and Treacle 2003). See: <https://inspectionpanel.org/>.
6. This review was approved at the highest level, yet the evaluation department did not publish it.
7. See <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework> (Accessed: 8 July 2024).
8. For case evidence and sources, see Fox (2020).
9. The identification of these patterns confirms the relevance of operationalizing the concept of 'political opportunity' by focusing on how targeted openings enabled collective action for specific constituencies, in contrast to the conventional framing of political opportunities in more generic terms (Meyer and Minkoff 2004).
10. For further discussion, see Fox (2020).
11. This is consistent with Gaventa and Barrett's meta-analysis of 100 cases of collective action, which concluded: 'citizen engagement through local associations and social movements emerged as more important sources of change than formal participatory governance spaces, with associations showing the highest percentage of positive outcomes' (2012: 2407).
12. For studies that stress the significance of meso-level mass membership organizations of the excluded for participation to have substantive impacts on states and markets, see Chen et al. (2007), Esman and Uphoff (1984) and Fox (2007). On the relevance of scale for independent policy monitoring and advocacy, see also Fox (2016).
13. The contemporary World Bank policies that mandate stakeholder engagement have not been accompanied by tangible improvements in proactive disclosure. For example, three decades after the first public information policy, few projects make public key documents in national

languages. In spite of the World Bank's use of third-party project monitoring, the results are rarely disclosed. Moreover, few projects also disclose Operational Manuals, which are already in national languages and provide specific about rules and decision-making processes that are essential for informed stakeholder engagement. World Bank staff point out that such documents belong to national governments, but no rules prevent them from asking governments to disclose them.

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