

Child Labor Coalition
1701 K Street, N.W., Suite 1200, Washington, D.C. 20006
Phone: 202.207.2820 Email: reidm@nclnet.org
www.stopchildlabor.org



March 14, 2016

Dr. Jim Yong Kim
President
World Bank Group
1818 H Street, NW
Washington, DC 20433

Dear President Kim,

Through our membership in the Child Labor Coalition (CLC), we write to you as organizations representing millions of Americans, including teachers, healthcare professionals, workers, farmworkers, and advocates concerned about the safety, education, and welfare of children. Many of the CLC's 40 organizations work internationally to end child labor and improve the lives of children through projects to improve adult livelihoods, reduce child labor, keep children in schools and out of fields and factories, and improve the capacities of governments and organizations to fight exploitation.

The CLC has closely followed the World Bank safeguards review process with the expectation that this process would provide an opportunity for the Bank to finally adopt prohibitions on the use of child labor in its projects. In April 2013 we submitted a letter calling upon the World Bank safeguards to "prohibit child labor and require respect for fundamental labor rights, as defined by the ILO, by all companies involved in the project." We are pleased to see that the second draft of the safeguards does set a minimum age for work and prohibit "harmful child labor," but we see a number of remaining weaknesses with the draft.

The failure of the safeguards to explicitly refer to the ILO core conventions is a critical missed opportunity to protect children, and all workers, from violations of their rights. In particular, freedom of association is an integral safeguard in the fight against worker exploitation and child labor, and must be more clearly protected in all World Bank projects. Where unions exist, illegal child labor is rarely found. Worker consultation and worker reporting are critical if you hope to avoid labor abuses such as those that took place in Uganda. We urge the Bank to strengthen its protections of labor unions and workers' rights to unionize and collectively bargain.

The CLC would like to applaud the World Bank's decision to shut down the Uganda Transport Sector Development Project (TSDP) for pressing reasons that included its impact on children. As you noted at the time, *"It is our obligation to properly supervise all investment projects to ensure that the poor and vulnerable are protected in our work."*

We believe the experience of the Uganda TSDP, with its deplorable sexual abuse of girls and use of child labor in roadbuilding, highlights the increased risks that children often face in World Bank project areas-- as boom towns expand and project areas fill with adult workers and frenetic activity, allowing illegal behavior to remain hidden. We believe that all World Bank projects hold a high risk for child exploitation. Moving forward, we would like to learn how the Uganda example may impact the World Bank's other projects.

We were very pleased that you spoke about paying heed to the lessons learned from Uganda: *"to fully review the circumstances of this project and then to quickly learn from our and others' failures so they do not happen again. The World Bank is committed to be a global leader in Environmental and Social Standards in the development sphere, and part of that critical responsibility is to watch projects closely and ensure that risks are properly addressed."*

We urge the Bank to design the new safeguards with the example of Uganda in mind to avoid the many instances of exploitation that arose there, notably ensuring that the policies maintain clear lines of accountability to the Inspection Panel. Clearly, we seek a safeguard with the strongest possible child protections.

We strongly urge the Bank to include child labor experts in any future experts' meetings related to labor, children, or the impact of projects on communities. We believe that including groups working on child labor issues in stakeholder engagement processes may help prevent the exploitation of children in the future.

The Child Labor Coalition continues to be deeply concerned about World Bank economic support to the agriculture sector of Uzbekistan, one of very few governments in the world that orchestrates widespread forced labor. We strongly urge the World Bank to suspend disbursements until the Uzbek government demonstrates progress reforming the root causes of forced labor, and its financial system that incentivizes officials to use coercion and repression of citizens who report violations. This must include meaningful progress on the ground, beyond commitments.

If the World Bank is sincere about ending labor abuses in project areas, Uzbekistan would be a vital place to start.

We were heartened to hear your comments in the wake of the Uganda TSDP withdrawal and hope you will share your thoughts about our concerns as the Bank moves forward.

Sincerely,



Sally Greenberg
Executive Director
National Consumers League
Co-chair, Child Labor Coalition



Dr. Lorretta Johnson
Secretary-Treasurer
American Federation of Teachers
Co-chair, Child Labor Coalition

On behalf of,

The Child Labor Coalition, whose members include:

American Federation of Teachers

Association of Farmworker Opportunity Programs

Bank Information Center

Beyond Borders

buildOn

Communications Workers of America

East Coast Migrant Head Start Project

ECPAT-USA

Farmworker Justice

First Focus Campaign for Children

Free the Slaves

Global Campaign for Education—US

Global Fairness Initiative

GoodWeave

Green America

Human Rights Watch

Injury Control Research Center, West Virginia University

International Brotherhood of Teamsters

International Initiative to End Child Labor

International Labor Rights Forum

Media Voices for Children

Migrant Legal Action Program

National Association of State Directors of Migrant Education

National Consumers League

National Education Association

National Migrant and Seasonal Head Start Association

The Ramsay Merriam Fund

Restavek Freedom Foundation

Save the Children

Solidarity Center, AFL-CIO

United States Fund for UNICEF

United Food and Commercial Workers International Union

United Methodist Church, Board of Church and Society

United Methodist Women

United Mine Workers of America

US Fund for UNICEF

Walden Asset Management

A World at School

Winrock International

World Vision