



Review and Update of the World Bank’s Environmental and Social Safeguard Policies

Phase 2 Consultations – Feedback Summary

Date: 30 October 2014

Location: Ankara, Turkey

Audience: Government Representatives

Overview and Key Issues Discussed: Bank representatives welcomed the participants from government ministries and project implementation units. They provided an [overview](#) of the process undertaken to date on the review and update of the policies and presented the draft “Environmental and Social Framework: Setting Standards for Sustainable Development.” Bank representatives also noted that the President of the Bank has extended the consultation process, at least into January 2015.

Participants were then invited to ask questions and to express their views.

Specific Feedback from Stakeholders
<p>1. General Comments</p> <p><i>Comments:</i></p> <ul style="list-style-type: none"> • A participant considered that under the new framework, borrowers working in cooperation with the Bank would be able to process projects more quickly. • A participant remarked that the framework contains general expressions about development and reducing poverty while also protecting the environment and labor conditions. The participant wondered whether these were not contradictory objectives in the case of developing countries. <p><i>Clarifications:</i></p> <ul style="list-style-type: none"> • A participant sought clarification on how the new standards would affect ongoing projects.
<p>2. A Vision for Sustainable Development</p>
<p>3. World Bank Environmental and Social Policy</p> <p><i>Clarifications:</i></p> <ul style="list-style-type: none"> • A participant wished to know if the Bank would still review EIAs under the new Framework.
<p>4. Environmental and Social Standard 1 (ESS1): Assessment and Management of Environmental and Social Risks and Impacts</p> <p><i>Comments:</i></p>

Specific Feedback from Stakeholders

- A participant remarked that World Bank requirements have become more stringent over time and was concerned that the new framework would be even more so.

Clarifications:

- A participant sought clarification on the application of borrower systems to assessment of project environmental and social risks and whether that meant that some current steps in the process would not be necessary.
- A participant sought clarification on whether there would be a pre-classification of countries by capacity level and whether all countries would be treated in the same way.
- Noting that the Bank's monitoring criteria are very different from Turkish legislation, the participant wished to know whether there would be a new reporting system, with new documentation requirements.

Recommendations:

- A participant noted the differences between current Bank policies and Turkish requirements, in particular in regard to environmental assessment and stakeholder engagement. For example, for some projects that would be placed in Category B according to the Bank, environmental assessment would not be required under Turkish legislation. With a smaller investment or if the Bank financing is only a small part of the whole, project developers are often only concerned with legislation. Clients may go elsewhere if requirements are too onerous. For projects with less risk than Category A, greater flexibility is needed.

5. Environmental and Social Standard 2 (ESS2): Labor and Working Conditions

Clarifications:

- A participant sought clarification on Bank requirements as well as sanctions in regard to occupational health and safety and ILO conventions, particularly if a country has not signed all of them and/or does not abide by the principles in the conventions or agreed with the Bank.

6. Environmental and Social Standard 3 (ESS3): Resource Efficiency and Pollution Prevention

7. Environmental and Social Standard 4 (ESS4): Community Health and Safety

8. Environmental and Social Standard 5 (ESS5): Land Acquisition, Restriction on Land Use and Involuntary Resettlement

9. Environmental and Social Standard 6 (ESS6): Biodiversity Conservation and Sustainable Management of Living Natural Resources

Clarifications:

- A participant sought clarification on the definition of natural/modified/critical habitats in the new framework and how the standard would be applied.

10. Environmental and Social Standard 7 (ESS7): Indigenous Peoples

11. Environmental and Social Standard 8 (ESS8): Cultural Heritage

Specific Feedback from Stakeholders
12. Environmental and Social Standard 9 (ESS9): Financial Intermediaries
<p><i>Clarifications:</i></p> <ul style="list-style-type: none"> • A participant said that having a new FI Standard is good in principle but noted that they had not yet had an opportunity to read the draft and would provide comments later.
13. Environmental and Social Standard 10 (ESS10): Information Disclosure and Stakeholder Engagement
<p><i>Clarifications:</i></p> <ul style="list-style-type: none"> • Public consultations can have unintended negative consequences. A participant cited unpleasant experiences where they felt threatened during such meetings and was of the opinion that the new ESSF should not require public consultation meetings in cases where there is known to be strong resistance to the project by some parties. • Another participant felt that making information available to the public should be sufficient – no need to have actual face-to-face meetings. • A participant sought clarification on what consultations would entail and who would need to be involved, such as nongovernmental organizations, and what the Bank’s approach would be if such consultations were not held. • In relation to consultations, a participant sought clarification on the Bank’s position in case consultations indicate that nongovernmental organizations are against a particular project, in particular if the project involves aspects covered by international conventions that a country may not have signed.

The Bank representatives thanked everyone for their inputs and encouraged participants to submit inputs in writing. The address for submitting feedback is:

<https://consultations.worldbank.org/forums/forum-review-and-update-world-bank-safeguard-policies>

Additional information, including links to the policies, fact sheets on the Framework and a Q&A, can be found at: <http://consultations.worldbank.org/consultation/review-and-update-world-bank-safeguard-policies>