



## ASPECTS OF THE ENVIRONMENTAL & SOCIAL SAFEGUARDS POLICIES THE BANK CAN IMPROVE

- Designate clear responsibilities for better implementation and applicability of the policies.
- Ensure more clarity between principles, policy and procedures.
- Allow greater flexibility in application of safeguard policies on an individual/case by case basis.
- Focus on implementation beyond project preparation. There is a need for new guidelines focusing on implementation aspects and difficulties, as it is not possible to foresee all outcomes before a Project is implemented.
- Set clear standards to avoid conflicting directions on the same matter.
- Define projects clearly and demarcate where the WB's role begins and ends. A lot of problems in urban development are due to the definition of the project and where the WB's role begins and ends.
- Set clear cut off dates for compensation eligibility, to prevent people from doing illegal constructions to demand compensation after a project is announced.
- Relax the connection between the principles and procedures to allow procedural flexibility. Countries and projects should be treated on their merit. If the country has adequate regulations it should not be treated the same as countries with weak regulations.
- Water extraction from the ground should be given priority when the WB works with the government as there are no proper laws or national policy on ground water extraction.

## COUNTRY SYSTEMS & CAPACITY BUILDING

- WB should be more flexible in applying safeguard policies. Relax some of the policies taking into account the track record of the client.
- Don't go for 100% risk adverse behavior. The WB should also take some risks and share the risk with the government instead of trying to pass on the entire risk burden to the government.
- Share the principles of safeguards so that the client can adapt this to their specific and practical context.
- Monitoring. Make provisions for a continuous monitoring of the environmental and social safeguards.
- If countries have an adequate legal, environmental and social protection framework these countries should not be treated the same way as countries that do not have such regulatory coverage.
- Delegate some responsibilities to local WB office to reduce time. If a project is moving and there is good governance, delegate some things to the local WB office or the ministry/client.
- Take into account the legislation and constitutional policies of the country (e.g. 13th amendment).
- Include Provincial Councils (PCs) in consultations. The WB and other organization work with the central government and PCs are very rarely taken into the discussion. But PCs are elected bodies. So PCs should be consulted.
- Consider how to meet the need for a multi structural policy. For example, in Sri Lanka there are interlinked dam clusters. If a small dam fails it affects the large dams as well. In applying the policies one needs to look at entire cluster and not just large dams.

## RECOMMENDATIONS REGARDING THE EMERGING AREAS

- Policies should be framed so that spillway gate operations of dams are considered very seriously in the context of climate change. Moreover, under urban development projects roads are widened and also elevated which, due to climate changes, causes flooding in areas that were previously not susceptible to flooding.
- The focus is on building hospitals and there is less focus on health care management and medical waste management. Health and safety standards have to be strengthened.
- Flooding and landslides have happened during project implementation but the project does not have the finances to address such sudden situations, as it was not considered during project design stage.

## ADDITIONAL COMMENTS OR SUGGESTIONS

- Build capacity of external consultants. They are not well informed about WB requirements.
- Build capacity to supply contractors, as there is a shortage of contractors for dam works.
- Educate communities about safeguard policies.
- Develop a data sharing policy. Different agencies have different databases but are not willing to share.
- Develop a document on lessons learned on implementing safeguard policies, as a guide for the future.
- EIAs have been used for the last two decades but they are not effective because the EIA system is not designed to safeguard the environment. (Prawn farmers, Mahaweli project and human elephant conflict are a tangible example of this). There is a need to change the local EIA laws as well as the Strategic Environmental Management laws and consider the use of Strategic Environmental Assessments.