

# Excerpt: **World Bank Environmental and Social Framework**

First Draft for Consultation (CSM) from July 2014

## **Overview of the World Bank's Environmental and Social Framework**

1. The World Bank Environmental and Social Framework sets out the World Bank's commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards that are designed to support Borrowers' projects, with the aim of ending extreme poverty and promoting shared prosperity.

2. This Framework comprises:

*A Vision for Sustainable Development,*

*Environmental and Social Policy,* which sets out the mandatory requirements that apply to the Bank;

The *Environmental and Social Standards,* which set out the mandatory requirements that apply to the Borrower and projects;

The *Environmental and Social Procedures,* which set out requirements mandatory for both the Bank and the Borrower on how to implement the Policy and the Standards; and

Non-mandatory *guidance and information tools,* to support Bank and Borrower implementation of the Policy and the Standards.

3. The *World Bank Environmental and Social Policy* sets out the requirements that the Bank must follow regarding projects it supports through Investment Project Financing.

4. The *Environmental and Social Standards* set out the requirements for Borrowers relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing. The Bank believes that the application of these standards, by focusing on the identification and management of environmental and social risks, will support Borrowers in their goal to reduce poverty and increase prosperity in a sustainable manner for the benefit of the environment and their citizens. The standards will: (a) support Borrowers in achieving good international practice relating to environmental and social sustainability; (b) assist Borrowers in fulfilling their national and international environmental and social obligations; (c) enhance non-discrimination, transparency, participation, accountability and governance; and (d) enhance the sustainable development outcomes of projects through ongoing stakeholder engagement.

5. The ten Environmental and Social Standards establish the standards that the Borrower and the project will meet through the project life-cycle, as follows:

Environmental and Social Standard

1: Assessment and Management of Environmental and Social Risks and Impacts;

- 2: Labor and Working Conditions;
- 3: Resource Efficiency and Pollution Prevention;
- 4: Community Health and Safety;
- 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
- 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- 7: Indigenous Peoples;
- 8: Cultural Heritage;
- 9: Financial Intermediaries;
- 10: Information Disclosure and Stakeholder Engagement

6. The Framework also includes non-mandatory guidance and information tools to assist Borrowers in implementing the Standards, Bank staff in conducting due diligence and implementation support, and stakeholders in enhancing transparency and sharing good practice.

7. Environmental and Social Standard (ESS) 1 applies to all projects for which Bank Investment Project Financing is sought. ESS1 establishes the importance of: (a) the Borrower's existing environmental and social framework in addressing the risks and impacts of the project; (b) an integrated environmental and social assessment to identify the risks and impacts of a project; (c) effective community engagement through disclosure of project-related information, consultation and effective feedback; and (d) management of environmental and social risks and impacts by the Borrower throughout the life of the project. The Bank requires that all environmental and social risks and impacts of the project be addressed as part of the environmental and social assessment conducted in accordance with ESS1. ESS2–10 set out the obligations of the Borrower in identifying and addressing environmental and social risks and impacts that may require particular attention. These Standards establish objectives and requirements to avoid, minimize, and, where residual risks and impacts remain, to compensate for or offset such risks and impacts.

8. The **World Bank Access to Information Policy**, which reflects the Bank's commitment to transparency, accountability and good governance, applies to the entire Framework and includes the disclosure obligations that relate to the Bank's Investment Project Financing.

9. Borrowers and projects are also required to comply with the World Bank Group Environmental, Health and Safety Guidelines (EHSG).<sup>2</sup> These are technical reference documents, with general and industry specific examples of Good International Industry Practice (GIIP).

[http://www.ifc.org/wps/wcm/connect/Topics\\_Ext\\_Content/IFC\\_External\\_Corporate\\_Site/IFC+Sustainability/Sustainability+Framework/Environmental,+Health,+and+Safety+Guidelines](http://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/IFC+Sustainability/Sustainability+Framework/Environmental,+Health,+and+Safety+Guidelines)

10. The Framework includes provisions on grievance redress and accountability. A Bank-supported project will include a number of mechanisms for addressing concerns and grievances arising in connection with a project. Stakeholders will have access, as appropriate, to project grievance redress mechanisms, local grievance mechanisms, the Bank's corporate Grievance Redress Service (<http://www.worldbank.org/GRS;3> email: [grievances@worldbank.org](mailto:grievances@worldbank.org)) and the World Bank Inspection Panel. After bringing their concerns directly to the World Bank's attention and giving Bank Management a reasonable opportunity to respond, project-affected communities and individuals may submit their complaint to the World Bank's independent Inspection Panel to request an independent compliance audit to determine whether harm has occurred as a result of World Bank non-compliance with its policies and procedures. The World Bank Inspection Panel may be contacted by email at [ipanel@worldbank.org](mailto:ipanel@worldbank.org) or via its website at <http://www.inspectionpanel.org/>.

11. This Framework replaces the following Operational Policy and Bank Procedures: OP/BP4.00, OP/BP4.01, OP/BP4.03, OP/BP4.04, OP4.09, OP/BP4.10, OP/BP4.11, OP/BP4.12, OP/BP4.36 etc.

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## **A Vision for Sustainable Development**

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3. Equally, social development and inclusion are critical for all of the World Bank's development interventions. For the Bank, inclusion means empowering all citizens to participate in, and benefit from, the development process. Inclusion encompasses policies to promote equality of opportunity by improving the access of poor and disadvantaged people to education, health, social protection, infrastructure, affordable energy, employment, financial services and productive assets. It also embraces action to remove barriers against those who are often excluded from the development process, such as women, children, youth, and minorities, and to ensure that the voice of all citizens can be heard. In this regard, the Bank's operations are supportive of human rights and will encourage respect for them in a manner consistent with the Bank's Articles of Agreement.

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5. At the project level, these global aspirations translate into enhancing development opportunities for all, particularly the poor and vulnerable, and promoting the sustainable management of natural and living resources. Therefore, within the parameters of a project, the Bank seeks to:

- Avoid or mitigate adverse impacts to people and the environment;
- Conserve or rehabilitate biodiversity and natural habitats;
- Promote worker and community health and safety;
- Give due consideration to Indigenous Peoples, minority groups, and those disadvantaged because of age, disability, gender or sexual orientation, especially where adverse impacts may arise or development benefits are to be shared;
- Ensure that there is no prejudice or discrimination toward project-affected individuals or communities, particularly in the case of disadvantaged or vulnerable groups, in providing access to development resources and project benefits;

- and Address project-level impacts on climate change.

6. Where the Borrower's environmental and social assessment has identified potential development opportunities associated with the project, the Bank will discuss with the Borrower the feasibility of including these opportunities in the ...

## **World Bank Environmental and Social Policy**

### **Purpose ( page 8)**

1. This Environmental and Social Policy<sup>1</sup> sets out the mandatory requirements of the Bank<sup>2</sup> in relation to the projects it supports through Investment Project Financing.<sup>3</sup>

### **Objectives and Principles**

2. The Bank is committed to supporting Borrowers<sup>4</sup> in the development and implementation of projects that are environmentally and socially sustainable, and to enhancing the capacity of national environmental and social frameworks to assess and manage the environmental and social risks and impacts of projects. To this end, the Bank has defined specific Environmental and Social Standards (ESSs), which are designed to avoid, minimize or mitigate the adverse environmental and social risks and impacts of projects. The Bank will assist Borrowers in their application of the ESSs to projects supported through Investment Project Financing in accordance with this Environmental and Social Policy (Policy).

3. To carry out this Policy, the Bank will:

(a) Undertake its own due diligence of proposed projects, commensurate with the nature and potential significance of the environmental and social risks and impacts related to the project;

(b) As and where required, assist the Borrower to carry out early and continuing engagement and meaningful consultation with stakeholders,<sup>5</sup> in particular affected communities, and assist the Borrower in providing project-based grievance mechanisms;

(c) Assist the Borrower in identifying appropriate methods and tools to assess and manage the potential environmental and social risks and impacts associated with the project;

(d) Agree with the Borrower on the conditions under which the Bank is prepared to provide support to a project, as set out in the Environmental and Social Commitment Plan (ESCP);<sup>6</sup> and

(e) Monitor the environmental and social performance of a project in accordance with the ESCP and the ESSs.

4.

(a) ....

(b) Social risks and impacts, including: (i) threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence; (ii) risks that project impacts fall disproportionately on disadvantaged or vulnerable groups;<sup>9</sup> (iii) any prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits, particularly in the case of

disadvantaged or vulnerable groups; (iv) negative economic and social impacts relating to the involuntary taking of land or restriction on access to natural resources; (v) risks or impacts associated with land and natural resource tenure and use, including (as relevant) potential project impacts on local land use patterns and tenurial arrangements, land access and availability, food security and land values, and any corresponding risks related to conflict or contestation over land and natural resources; (vi) impacts on the health, safety and well-being of workers and project-affected communities; and (vii) risks to cultural heritage.

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#### **Bank Requirements (page11):**

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13. The Bank will require the Borrower to structure projects so that they meet the requirements of the ESSs in a manner and a timeframe acceptable to the Bank.

#### **A. Classifications (page12)**

24. The Borrower's ES Framework will include those aspects of the country's policy, legal and institutional framework, including its national, subnational, or sectoral implementing institutions and applicable laws, regulations, rules and procedures, and implementation capacity, which are relevant to the environmental and social risks and impacts of the project. Where there are inconsistencies or lack of clarity within the ES Framework as to relevant authorities or jurisdiction, these will be identified. The aspects of the Borrower's existing ES Framework that are relevant will vary from project to project, depending on such factors as the type, scale, location and potential environmental and social risks and impacts of the project and the role and authority of different institutions. The review conducted by the Bank will assess to what extent the Borrower's ES Framework addresses the risks and impacts of the project, and enables the project to achieve objectives materially consistent with the ESSs.

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#### **D. Special Considerations (page 15)**

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35. The Bank will require the Borrower to carry out appropriate environmental and social assessment of all subprojects in accordance with national law. Where subprojects are classified as *High Risk*, the environmental and social assessment will be consistent with ESSs 1 to 8 and ESS10. The Bank will require the Borrower to ensure that subprojects are structured to meet national regulatory requirements relating to environmental and social risks and impacts, and where subprojects are classified as *High Risk*, they are also structured to meet ESSs 1 to 8 and ESS10.

36. In assessing a proposed project involving an FI, the Bank will review the adequacy of national environmental and social requirements relevant to the project and the proposed subprojects, and the capacity of the to manage environmental and social issues. This will include an assessment of the procedures the FI will use to: (a) conduct environmental and social screening and classification of subprojects; (b) ensure sub-borrowers' conduct of environmental and social assessment of proposed subprojects; and (c) review the result of such assessments. When necessary, the Bank will ensure that the project includes measures to strengthen such procedures

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#### **F. Information Disclosure**

42. In line with ESS10 and the World Bank Policy on Access to Information, the Bank will require the Borrower to ensure that sufficient information about the potential risks and impacts of the project is

made available in a timely manner, in an **accessible place and format** and in a form and language understandable to project-affected people and other stakeholders, so they can provide meaningful input into project design and mitigation measures.

43. The Bank will apply the World Bank Policy on Access to Information with regard to all documents provided to it by the Borrower.

### **G. Consultation and Participation**

44. The Bank will require the Borrower to engage with communities, groups, or individuals **including persons with disability** affected by proposed projects, and with civil society, through information disclosure, consultation, and informed participation in a manner commensurate with the risks to and impacts on affected communities. The Bank will have the right to participate in consultation activities to understand the concerns of affected people, and how such concerns will be addressed by the Borrower in project design and mitigation measures in accordance with ESS10. For *High Risk* or complex projects with potentially significant adverse environmental and social impacts, the Bank will have the right to carry out independent consultation activities.

## **Environmental and Social Standards (ESS) 1 (page 21): Assessment and Management of Environmental and Social Risks and Impacts**

1. ESS1 sets out the Borrower's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing, in order to achieve environmental and social outcomes consistent with the ESSs. ESS1 also obliges the Borrower to consider the requirements of ESSs2 to 10.
2. ....

### **Scope of Application**

6. ESS1 applies to all projects supported by the Bank through Investment Project Financing. Borrowers will structure projects so that they meet the requirements of the ESSs in a manner and timeframe acceptable to the Bank,<sup>4</sup> as set out in the ESCP.<sup>5</sup>

7. The term "project" refers to the set of activities for which the Bank financing referred to in paragraph 6 is sought by a Borrower, as defined in the legal agreement and approved by the Bank.<sup>6</sup>

8. New facilities and new activities to be financed by the Bank will be designed to meet the requirements of the ESSs.

9. If the project comprises or includes existing facilities or existing activities that do not meet the requirements of the ESSs at the time of Board approval, the Borrower will be required to adopt and implement measures satisfactory to the Bank so that, where deemed necessary by the Bank, specific aspects of such facilities and activities, as identified by the Bank, meet the requirements of the ESSs within a timeframe acceptable to the Bank.

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14. Where the Borrower is deemed by the Bank to: (a) be in urgent need of assistance because of a natural or man-made disaster or conflict; or (b) experience capacity constraints because of fragility or specific vulnerabilities (including for small states), the Borrower may seek the Bank's support in accordance with the specific policy requirements and special considerations set out in OP10.00.<sup>14 11</sup>

## Requirements

15. The Borrower will assess, manage and monitor the environmental and social risks and impacts of the project throughout the project life-cycle so as to meet the requirements of the ESSs in a manner and within a timeframe acceptable to the Bank.<sup>15 12</sup>

16. The Borrower will:

(a) Conduct environmental and social assessment of the proposed project, including stakeholder engagement;

(b) Disclose appropriate information and undertake stakeholder engagement in accordance with ESS10;

(c) Develop and implement a UAIP; ( DPI)

(d) Develop and implement an ESCP; and

(e) Conduct monitoring and reporting on the environmental and social performance.....

(f) Make sure that Persons with disabilities are taking part in decision making and implementation of project activities during the project cycle that include stages in project design, implementation, monitoring and evaluation. Furthermore, all borrowers reports will be produced and be disseminated in accessible formats to PWDs (sign language, braille, large print, tactile sign language and simplifies language use)

(g) For all community consultations prepare and sign contracts (changes) and make it part of its annexes for all applications to the bank.

17. The project will comply with the applicable requirements of the Environmental Health and Safety Guidelines (EHSG). When host country requirements differ from the levels and measures presented in the EHSG, the Borrower will be required to achieve or implement whichever is more stringent. If less stringent levels or measures than those provided in the EHSG are appropriate in view of the Borrower's limited technical or financial constraints or other specific project circumstances, the Borrower will provide full and detailed justification for any proposed alternatives through the environmental and social assessment, including justifications related to the requirements for the Universal Accessibility and Inclusion Plan (Annex 2)(DPI). This justification must demonstrate, to the satisfaction of the Bank, that the choice of any alternative performance level is consistent with the objectives of the ESSs and the applicable EHSG, and is unlikely to result in any significant environmental or social harm.

### A. Use of Borrower's ES Framework ( page 24)

18. When a project is proposed for Bank support, the Borrower will provide information to the Bank in connection with the Bank's review of the Borrower's existing environmental and social framework relevant for the proposed project (the ES Framework)

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20. The Borrower will take all actions necessary to maintain the ES Framework, as well as acceptable implementation practices, track record, and capacity, in accordance with the Bank's review and the measures and actions identified in the ESCP, for the duration of the project. The Borrower will notify the Bank of any material changes in the ES Framework that may affect the project.<sup>15</sup> If the ES Framework is changed in a manner inconsistent with the ESSs and the ESCP, the Bank will, at its discretion, either: (a) require revisions to the ESCP as necessary to meet the requirements of the ESSs; and/or (b) take such other measures as the Bank deems appropriate, including applying the Bank's remedies.

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22. The environmental and social assessment will be based on current information, including an accurate description and delineation of the project and any associated aspects, and environmental and social baseline data at an appropriate level of detail and disaggregation for different groups within the community (DPI) sufficient to inform characterization and mitigation of impacts....

23. The environmental and social assessment will be an adequate, accurate, and objective evaluation and presentation of the risks and impacts, prepared by qualified and experienced persons. Depending on the potential significance of risks and impacts, the Borrower may be required to retain independent third party specialists to prepare or review all or part of the assessment especially as related to disadvantaged

or vulnerable groups.<sup>23(DPI)</sup> 19

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24. The Borrower will ensure that the environmental and social assessment takes into account in an appropriate manner all issues relevant to the project, including: (a) the country's applicable policy framework, national laws and regulations, and institutional capabilities (including implementation) relating to environment and social issues; variations in country conditions and project context; country environmental or social studies; national environmental or social action plans; and obligations of the country directly applicable to the project under relevant international treaties and agreements (ensuring accessibility and inclusion issues regarding disadvantaged or vulnerable groups are incorporated into the assessment whether existing in the country or are noticeably missing)(DPI); (b) applicable requirements under the ESSs; and (c) the EHSg, and other relevant GIIP. The assessment of the project, and all proposals contained in the assessment, will be consistent with the requirements of this paragraph....

26. The environmental and social assessment, informed by the scoping of the issues, will take into account all relevant environmental and social risks and impacts of the project, including:

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(b) Social risks and impacts, including: (i) threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence; (ii) risks that project impacts fall disproportionately on disadvantaged or vulnerable groups; (iii) any prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits, particularly in the case of disadvantaged or vulnerable groups; (iv) any additional risks and adverse impacts to persons with disabilities by limiting environmental barriers to access and inclusion in project benefits; (v)(DPI) negative economic and social impacts relating to the involuntary taking of land or restriction on access to natural resources; (v) risks or impacts associated with land and natural resource tenure and use, including (as relevant) potential project impacts on local land use patterns and tenurial arrangements, land access and availability, food security and land values, and any corresponding risks related to conflict or contestation over land and natural resources; (vi) impacts on the health, safety and well-being of workers and project-affected communities; and (vii) risks to cultural heritage.

27. Where the environmental and social assessment of the project identifies specific individuals or groups as disadvantaged or vulnerable, the Borrower will propose and implement differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing any development benefits and opportunities resulting from the project.

30. The environmental and social assessment will also identify and assess, to the extent appropriate, the potential environmental and social risks and impacts of Associated Facilities. The Borrower will address the risks and impacts of Associated Facilities in a manner commensurate with its control and influence over the Associated Facilities.<sup>32 26</sup> To the extent that the Borrower cannot control or influence the Associated Activities to meet the requirements of the ESSs, the environmental and social assessment will also identify the risks and impacts the Associated Facilities may present to the project, including those identifiable under the Universal Accessibility and Inclusion Plan in Annex 2.<sup>33(DPI)</sup>

31. For projects that are High Risk or contentious, or that involve serious multidimensional environmental or social risks or impacts, the Borrower may be required to engage one or more internationally recognized independent experts. This is critically important for disadvantaged and vulnerable groups whose issues are not generally well understood and multidimensional in nature.<sup>34(DPI)</sup>

## A. Environmental and Social Commitment Plan ( page 29)



### **C. Universal Accessibility and Inclusion Plan**

34. The Borrower will develop and adopt an UAIP, which is prepared as part of the Environmental and Social Assessment process and will set out measures and actions required for maximizing environmental and social access and inclusion by the affected communities and stakeholders. The UAIP will become part of the ESCP, and Environmental and Social Management Plan (ESMP) if one is prepared.

35. The UAIP makes special efforts to assess risks and impacts and to use and apply the mitigation hierarchy specified under the ESS1 Objectives and paragraph 25 to ensure disadvantaged or vulnerable individuals and/or groups among the project's affected communities and stakeholders are not disproportionately adversely affected or limited from equally sharing in project benefits.

36. The UAIP is to be used to correct environmental barriers for persons with disabilities from past projects, where opportunities are possible, and ensure present and foreseeable future projects/subprojects do not create new or exacerbate environmental barriers for persons with disabilities adversely affecting environmental and social access and inclusion to sharing in the benefits equal to all other community members.

37. Prepare the Borrower to better incorporate a comprehensive perspective into the project design and Implementation facilitating the specific accessibility and inclusion details for compliance with the ESSs 2-9.

### **D. C. Environmental and Social Commitment Plan**

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34. The Borrower will develop and adopt an ESCP, which will set out measures and actions required for the project to achieve compliance with the ESSs over a specified timeframe. The UAIP prepared under Environmental and Social Assessment process to maximize access and inclusion for all affected peoples will be included in the ESCP.<sup>37</sup>The ESCP will be agreed with the Bank and will form part of the legal agreement.

39. The ESCP will set out a summary of the training that the Borrower will provide to address the specific actions required under the ESCP, identifying the recipients of such training and the required human and financial resources.

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45.41. Where appropriate, the ESCP will include a requirement that the Borrower prepare, and submit to the Bank for review, a process that allows for adaptive management of proposed minor project changes<sup>42</sup> or unforeseen circumstances. For any measures associated with the UAIP affecting the disadvantaged and vulnerable groups the Borrower must demonstrate adequate capacity, experience, and expertise

### **B. Implementing the ESCP ( page 30)**

42. The Borrower will implement diligently the measures and actions identified in the ESCP in accordance with the timeframes specified, and will review the status of implementation of the ESCP as part of its monitoring and reporting.

43.39. The ESCP will set out a summary of the training that the Borrower will provide to address the specific actions required under the ESCP, identifying the recipients of such training and the required human and financial resources, and any necessary independent external expertise.<sup>41</sup>including the use of independent external expertise, to make the determination and recommendation regarding such adaptive management project changes.

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44. The Borrower will ensure that persons with direct responsibility for activities relevant to the implementation of the ESCP are adequately qualified and trained so that they have the knowledge and skills necessary to perform their work. The Borrower, either directly or through agencies responsible for

implementing the project, will provide training to address the specific measures and actions required by the ESCP, and to support effective and continuous social and environmental performance.

45. The ESCP will identify the different management tools that the Borrower will use to develop and implement the measures and actions set out in the ESCP. These management tools will include, as appropriate, environmental and social management plans, environmental and social management frameworks, operational policies, operational manuals, management systems, procedures, practices and capital investments. All management tools will apply the mitigation hierarchy, and incorporate measures so that the project will meet the requirements of applicable laws and regulations and the ESSs<sup>34</sup> in accordance with the ESCP for the duration of the project.

#### **E. Project Monitoring and Reporting (page 31)**

49. The Borrower will monitor and measure the environmental and social performance of the project in accordance with the legal agreement (including the ESCP). The extent of monitoring will be agreed upon with the Bank, and will be commensurate with the nature of the project, the project's environmental and social risks and impacts, and compliance requirements. The Borrower will ensure that adequate systems, resources and personnel are in place to carry out monitoring. Where appropriate, the Borrower will engage stakeholders and third parties, such as independent experts, local communities or NGOs including disability organization, to complement or verify its own monitoring activities. Where other agencies or third parties are responsible for managing specific risks and impacts and implementing mitigation measures, the Borrower will collaborate with such agencies and third parties to establish and monitor such mitigation measures.

50. Monitoring will normally include recording information to track performance, and establishing relevant operational controls to verify and compare compliance and progress. Monitoring will be adjusted according to performance experience, as well as actions requested by relevant regulatory authorities and feedback from stakeholders such as community members and NGOs including disability organization. The Borrower will document monitoring results.

51. The Borrower will provide regular reports as set out in the ESCP (in any event, no less than annually) to the Bank of the results of the monitoring. Such reports will provide an accurate and objective record of project implementation, including compliance with the ESCP and the requirements of the ESSs. The Borrower, and the agencies implementing the project, will designate senior officials to be responsible for reviewing the reports.

52. Based on the results of the monitoring, the Borrower will identify any necessary corrective and preventive actions, and will incorporate these in an amended ESCP or the relevant management tool, in a manner acceptable to the Bank. The amended ESCP will be disclosed to the stakeholders using the ESS10 process. The Borrower will implement the agreed corrective and preventive actions in accordance with the amended ESCP or relevant management tool, and monitor and report on these actions.

53. At the Bank's request, the Borrower will facilitate site visits by Bank staff or consultants acting on the Bank's behalf.

54. The Borrower will notify the Bank promptly of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the

public or workers. The notification will provide sufficient detail regarding such incident or accident, including any fatalities or serious injuries. The Borrower will take immediate measures to address the incident or accident and to prevent any recurrence, in accordance with national law and the ESSs.

55. The Borrower will report on stakeholder engagement during project implementation in accordance with ESS10

### **ESS1 – ANNEX 2: UNIVERSAL ACCESSIBILITY AND INCLUSION PLAN ( DPI!!!)**

1. To help meet the World Bank’s vision for sustainable development<sup>1</sup> through advancing the intertwined goals of ending extreme poverty and promoting shared prosperity this Universal Accessibility and Inclusion Plan is directed at capitalizing on all project opportunities to maximize accessibility and inclusion of all peoples. Social development and inclusion are critical to all Bank funded Borrower development project actions by removing attitudinal and environmental barriers to access of poor and disadvantaged people to such facilities and services as education, health, social protection, infrastructure, affordable energy, employment, financial services, and productive assets. Specific provisions are to be made by the Borrower for:

- ☑☑ Creating and enhancing social access for sharing in project benefits and reducing susceptibility to potential adverse risks and impacts from project actions to disadvantaged or vulnerable groups such as women, children, the elderly, persons with disability, or individuals defined by ethnicity, social and civic status, sexual orientation, gender identity or expression, or indigenous status; and
- ☑☑ Creating and enhancing environmental accessibility for persons with disabilities, who are some of the most vulnerable and disadvantaged individuals of any group susceptible to project actions, by avoiding or reducing potential risks and impacts of environmental barriers through the removal or redesign of project actions that are consistent with the principles of the Convention on the Rights of Persons with Disabilities (CRPD) and related national legislations and policies and international accessibility standards; for example, providing sign language interpretation, ramps, or accessible technology.

#### **Objectives**

2. The following objectives are to ensure the maximum accessibility and inclusion for all affected stakeholders within the project area of influence: <sup>2</sup>

☑☑ **Accessibility** – The freedom and ability of all stakeholders to attach meaning to person-to person and person-to-community unions that are established through emotional and environmental connections. Accessibility ensures disadvantaged and vulnerable people are given the same opportunity as any other community member to develop the personal attachments and identity that evolve through access of being included in shared experiences and environmental surroundings with groups, neighborhoods, and communities. For persons with disabilities accessibility is more than a function of universal design which may be a part of but not all of the accessibility measures necessary to promote independent living through full participation on an equal basis to others for all aspects of life such as measures that create access to the built environment, infrastructure, transportation, information and communications, and other facilities and services open or provided to the public. <sup>3</sup>The relationship of social and environmental accessibility and inclusion for all people ensures resilience and longevity of the community.

<sup>1</sup>See paragraphs 3 and 5 under, “A Vision for Sustainable Development”; paragraph 4 under, “World Bank Environmental and Social Policy”; and paragraphs 26(b) and 27 under ESS 1.

<sup>2</sup>“Stakeholder” refers to persons affected or potentially affected by project actions and in its area of influence which include but are not limited to project-affected communities, their families, and their communities of support as well as persons or groups in adjacent communities. See also ESS10, paragraph 5.

<sup>3</sup>Universal “accessibility” described here is consistent with the universal access concept as defined in the “Environmental and Social Framework” Glossary. It is inclusive and consistent with “The Convention on the Rights of consultation, and communication (see ESS10).

☑☑ **Inclusion** – This means empowering all stakeholders to participate in, and benefit from, the development process. Inclusion encompasses policies to promote equality of opportunity by

improving the access of poor and disadvantaged people to such facilities and services as education, health, social protection, infrastructure, affordable energy, employment, financial services, and productive assets; and, it embraces action to remove social and environmental barriers against those who are often excluded, such as women, children, youth, persons with disabilities, and minorities, or individuals and groups defined by ethnicity, social and civic status, sexual orientation, gender identity or expression, or indigenous status; and, to ensure that the voice of all stakeholders can be heard and responded to through effective means of disclosure,

3. The UAIP is to provide an assessment instrument that provides a long-term planning perspective to influence the short-term project design and implementation function for maximizing the usefulness of the mitigation hierarchy to avoid and minimize environmental and social accessibility and inclusion barriers to equitable sharing of project benefits, including any opportunities to correct or remove past and/or potential future project barriers.

4. The Bank requires the objectives of accessibility and inclusion to be read in conjunction with the *Concepts and Definitions for Environmental and Social Assessment Associated With Disadvantaged and Vulnerable Groups*.

#### **The Elements of the Plan**

5. The Universal Accessibility and Inclusion Plan (UAIP) is to be designed to promote access to the social and surrounding natural and built environments for improving mainstreaming of disadvantaged and vulnerable groups into society with equal access and inclusion of all other stakeholders. The Bank requires the Borrower to properly design, develop, and manage project actions throughout the project cycle by including measures to enhance sharing of benefits by all affected parties and prevent or minimize adverse risks and compensate for negative impacts. Special attention is to be given to the social and environmental effects on accessibility and inclusion that potentially accentuate the disproportionate effects on disadvantaged and vulnerable groups, especially those pertinent to persons with disabilities that are extremely sensitive to the detrimental effects of poverty due to both social and environmental barriers to accessibility and inclusion.

6. The Bank requires the development of the UAIP to be read and applied in combination with the *Concepts and Definitions for Environmental and Social Assessment as well as local legal framework Associated With Disadvantaged and Vulnerable Groups*.

7. The Borrower will retain independent specialists external to the project to carry out the UAIP when they lack the capacity, experience, or expertise to properly assess accessibility and inclusion issues, particularly with regard to disadvantaged and vulnerable groups, especially for persons with disabilities whose issues are not generally well understood and have multidimensional social and environmental barrier issues (see paragraph 12). Whenever possible, it is in the Borrower's interest and consistent with Bank policy to use an independent specialist from the disadvantaged or vulnerable groups in order to gain acceptance of and expedite Bank approval for Borrower's assessment. Confirmation of this capacity, experience, or expertise is to be acquired prior to developing the UAIP. Persons with Disabilities", Article 9 on Accessibility, discussing universal design as the design of products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design but also inclusive of assistive devices for particular groups of persons with disabilities where they are needed.

8. The UAIP will:

(A) describe the project actions that may potentially limit or inhibit stakeholders social and environmental accessibility and inclusion (before the use or application of possible mitigations) 4;

(B) describe the type and level of potential risk and impact from the actions identified in (A) and any other risks or impacts from proposed project actions that may not directly affect accessibility and inclusion but may be indirectly connected with limiting or inhibiting either;

(C) describe any other past projects actions within the project area of influence that have caused

limited social and environmental accessibility and inclusion issues for the present project actions (include a description of any standing actions being taken against such past projects by a disadvantaged or vulnerable group);

(D) describe any connections between proposed project actions and foreseeable future projects actions within the project area of influence that may be used to improve accessibility and inclusion on a long-term basis;

(E) develop a listing and description of a mitigation hierarchy to avoid, minimize, and compensate/offset actions with risks, and impacts identified in (A) and (B) and how they may enhance accessibility and inclusion over past projects and for foreseeable future projects (mitigation hierarchy measures are not to be eliminated at this point for financial or technical feasibility);

(F) describe the possible project design change alternatives necessary to incorporate the elements of (A), (B), and (E) (assumptions of costs or technical measures for any particular disadvantaged or vulnerable group are not acceptable and must be based on researched costs and technical measures including but not limited to previous project designs);

(G) include a projected timeline for how the alternatives described in (F) may be planned for and implemented;

(H) include a projected budget demonstrating how the alternatives described in (F) will be adequately funded from project design through implementation; and

(I) include a summary of the information disclosure and stakeholder engagement explaining the consultation done for the UAIP and any other relevant engagement information regarding stakeholder concerns and recommendations.

9. Project actions for purposes of the UAIP are to include the proposed project's subprojects and any financial intermediaries' projects/subprojects or other developers' project actions within their area of influence, where there are connected actions or cumulative effects.

10. The UAIP is to be part of the Environmental and Social Assessment (Annex 1) process but is to be written to stand on its own and will be included with the Environmental and Social Commitment Plan (Annex 3), and in the Environmental and Social Management Plan, if prepared.

11. If the Borrower proposes alternatives under (F) or modifications to the UAIP later in the Bank's project-cycle process, such alternatives and modifications with an explanation and recommendations are to be reviewed and approved by the Bank as to whether they are appropriate project alternative(s) for accessibility and inclusion based on the UAIP. The determinations and decisions regarding the proposed project will be disclosed in a timely manner to stakeholders and any others who provided comments during the stakeholder engagement process consistent with ESS10 and any of the other ESSs that may be impacted by the UAIP.

### **Concepts and Definitions for Environmental and Social Assessment Associated With Disadvantaged and Vulnerable Groups**

12. The following terms and definitions are for creating understanding and ensuring disadvantaged and vulnerable individuals and groups are properly considered and work in harmony when determining the classification of project risk, especially the High Risk classification, and developing an appropriate plan for coordinating and maximizing accessibility and inclusion consistent with the Bank's Mitigation Hierarchy. <sup>6</sup> The following terms are to be read, reviewed, and applied simultaneously and in concert with one another.

**(A) Significant Risk and Impact** – Potential significant risk and impact occur when the connections for accessibility and inclusion are disrupted, broken, or the opportunity to create or enhance them is missed during project design and development of environmental and social benefits. The following are examples of connections and relationships that characterize areas for potential significant risks and impacts for disadvantaged and vulnerable groups, they include but are not limited to the following:

a. For persons with disabilities, a vulnerable group that experiences multiple as well as multidimensional social and environmental effects puts them at extreme risk and impact, the significant connections and relationships include but are not limited to: (a) family and communities of support that are depended upon for assistance for livelihood and well being; (b) environmental and social accessibility that provides inclusion into the social fabric of the community, neighborhoods, and groups by supporting or permitting access into networks necessary for inclusion; and, (c) environmental and social accessibility for inclusion through a barrier free built environment (buildings, schools, healthcare centers, work places/spaces, homes, and infrastructure such as transportation, toilets, walkways), educational environment (instructional material and instruments usable through Braille, large print, human-readers, sign-language, electronic media technology, and trained staff), work environment (instruments or devices to do work and maintain their job; or, property/land used for livelihood that is usable by persons with disabilities) and communication devices and accommodations for a wide-range of disabilities throughout the general built environment.

b. For children, a group that is a numerically significant population group and a group that often experiences adverse impacts that have long-term irreversible effects given their evolving capacities; connections and relationships of significant importance include, but are not limited to: (a) parents and caregivers that are depended upon for financial security, emotional support and guidance, and overall well-being; (b) accessible, quality educational opportunities; (c) accessible, quality healthcare and healthcare facilities, and (d) access to adequate nutrition.

c. For sexual and gender minorities, a group made vulnerable because they are often compelled to be invisible due to the societal pressure and fear of persecution, which leads to experiences of multiple risks and impacts; the significant connections and relationships include but are not limited to social accessibility that: (a) provides inclusion with safe spaces from criminalization and violence; (b) has sensitive and trained staff that create a safe environment for quality education; (c) has trained staff for quality healthcare and a safe environment within the healthcare facilities; and, (d) provides a means to maintain financial security, emotional and overall well-being

d. For any disadvantaged or vulnerable persons or groups, the potential for acts of discrimination, prejudice, harassment, or violence against them increase the possibilities for significant adverse risks and impacts to their accessibility to the necessary and needed connections and relationships for their inclusion in project benefits and avoidance of disproportionate share of adverse impacts to their livelihood and existence.

These examples, as appropriate, apply to all forms of disadvantaged and vulnerable groups associated with characteristics such as their age, gender, disability, ethnicity, religion, social and civic status, sexual orientation or expression, gender identity, economic disadvantages or indigenous status; and all types of resources such as (a) buildings, roads, transportation and other indoor and outdoor facilities, including schools, housing, medical facilities and workplaces, and (b) Information, communications and other services, including electronic services and emergency services..

In all cases, significant risks and impacts for a project must be assessed both as a whole, whether or not there are subprojects, and by the intensity of the risks and impacts to any smaller identifiable units of individuals or groups. In other words, the project and subprojects cannot be piecemealed or broken down into diminutive increments to avoid potential significant risks and impacts (see *cumulative effect* and *connected action*).

Neither can smaller units such as disadvantaged or vulnerable individuals or groups affected within a project be found insignificant by their relatively small part of the overall project where there is potential for an intense impact or effect on them.

(B) **Cumulative Effect** – The potential for cumulative risks and impacts can occur both over time and within a living environment context. Project actions representing time considerations come from potential effects associated with any proposed project and its direct or indirect relationship to past, present, and reasonably foreseeable future project actions which include unplanned but predictable activities enabled by the project that may occur later or at a different location. Project actions, past, present, and future, representing the links with the living environment include but are not limited to: (a) the built, educational, and work environments (see *significant risk and impact*); (b) geography of the project and adjacent areas; and, (c) social structure which make up communities, groups, and/or individual life connections (see *significant risk and impact*). Cumulative effect must be read together with all other terms in this section acting as the assessment function for consolidating all past, present, and future project/subprojects actions and their potential risks, impacts, and effects.

(C) **Long-Term Irreversible Effect** – Potential long-term irreversible effect come from unresolved or missed impacts of project actions during project design, development, and/or implementation. The long-term nature of the effect is founded on the relationship of the impact and the duration of the effect on the persons or group. For example, a project action(s) impact to disadvantaged or vulnerable persons or group occurring at childhood such as the lack of access and inclusion to proper education has the effect on such persons/groups not only in the short-term but a high likelihood of extending into adulthood impacting employment or livelihood and on into old age adversely impacting health and access to other benefits of inclusion with the consequential effect of keeping them disadvantaged throughout their lifetime. Thus, any project that results in the unresolved or missed opportunity to apply the mitigation hierarchy to avoid, minimize, mitigate, or compensate/offset the risk of impact and effect of keeping individuals or groups in poverty, disadvantaged, and/or vulnerable throughout their lifetime makes such projects a High Risk of long-term irreversible effects.

(D) **Project Area of Influence** – The project area of influence is variable and dependent on direct, indirect, and cumulative impacts of project actions. For example, the project area of influence regarding accessibility and inclusion includes the affected environment associated with: (a) project actions having direct impacts and effects on the living environment of communities such as the built, educational, and work environments and effects on social connections such as communities of support and groups that support overall inclusion for livelihood and well being; (b) other adjacent communities or neighborhoods not funded as part of a Borrower's project but who are affected directly or indirectly by the Borrower's project actions; and, (c) communities, neighborhoods, or groups potentially affected by cumulative impacts from further foreseeable planned development of the project/subprojects or adjacent communities, neighborhoods, or groups.

(E) **Connected Action** – Connected actions are linked to the Borrower's project/subprojects by financial intermediaries' projects/subprojects or other developers' project actions within their area of influence or done upon an association with the Borrower's projects. For example, connected actions, within the project area of influence or overlapping areas of influence, include but are not limited to: (a) actions automatically triggered by a Borrower's other project/subprojects, financial intermediaries' projects/subprojects, or other developers' project actions; (b) are dependent on proceeding only if the Borrower's project/subprojects, financial intermediaries' projects/subprojects, or other developers'

project actions are taken prior to or simultaneously; or (c) are interdependent parts of the Borrower's larger project action and are depend on the larger action for their justification. Connected actions are part of the considerations for and determinations of direct/indirect, cumulative, and significant impacts and effects, as well as the determination of High Risk projects. An example of how disadvantaged and vulnerable groups may be affected by connected actions could be a Borrower's project that does not mitigate the development of a school to make it both socially accepting (change in perception and attitude) and barrier free (environmentally accessible) for children with disabilities so that another school or other infrastructure project within or overlapping the Borrower's project area of influence does not adhere to mitigating for social and environmental access and inclusion. Thus, these connected actions create a cumulative significant impact with long-term irreversible effects on the affected children by putting them at High Risk of poverty and experiencing lifelong existence of being disadvantaged and vulnerable.

(F) **High Risk** – Project/subprojects and financial intermediaries' project actions within their area of influence must be review in the context of potential connected, direct/indirect, cumulative, and significant impacts and effects which may result in long-term irreversible effects. While the risk may be determined in accordance with the World Bank Environmental and Social Policy (section A, paragraph 20) requiring consideration of relevant issues including type, location, sensitivity, and scale of the project, it is the environmental and social assessment that is used to assess the degree of environmental and social risks and impacts of projects during each stage of the project cycle (ESS1, paragraph 21). In meeting the objectives and purposes of the environmental and social assessment all of the terms in this section of the universal accessible and inclusion plan apply to the determination of risk category, especially in determining High Risk projects/subprojects and financial intermediary projects/subprojects. This determination is done without applying any possible mitigation measures in order to fully understand the extent of possible risks and impacts.

This is important for disadvantaged and vulnerable groups because of the common issue of overlooking such potential risk and impacts. And, it is especially important to persons with disabilities because of the multidimensional ways they can be impacted which multiplies the potential for risks (see example under *persons with disabilities risks and impacts*). Due to the significance of this environmental and social assessment process and the development of the universal accessibility and inclusion plan for disadvantaged and vulnerable groups in determining the appropriate risk classification of projects, it is required that the Bank review its own capacity for quality of experience and expertise as well as that of the Borrower and their contractors to decide whether independent third party specialists are needed. As under the definition for *significance of risk and impact*, the project/subprojects and financial intermediaries' project actions cannot be broken down into smaller pieces until the level of risk is insignificant where as a whole it may be significant or High Risk.

(G) **Mutlidimensional Risks or Impacts** – There are several ways this term may be used although for the purposes of use under the UAIP it is meant to be synonymous with being affected with both environmental or social risks, impacts, effects, or barriers. While having multiple social *or* environmental affects on any stakeholders, especially those making up the foundation for being disadvantaged or vulnerable, can lead to High Risk projects, projects having potential multidimensional social *and* environmental affects on persons or groups are likely to ensure that such projects will be classified High Risk. This also is pertinent to potential risks being first assessed without mitigation and then with the mitigation hierarchy prioritizing avoidance, reduction, and compensation/offset in that order. The mitigation hierarchy is very important to projects with potential multidimensional benefits and adverse risks from direct and indirect impacts so as not to become avoidable or unmitigated past, present, and future projects effects thus creating significant cumulative and long-term irreversible effects.

(H) **Persons With Disabilities Risks and Impacts** – Persons with disabilities have additional considerations affecting their being disproportionately disadvantaged or vulnerable to Borrower projects impacts or sharing of benefits. Person with disabilities can be part of any human group, including other disadvantaged and vulnerable groups such



as women, children, the elderly, or individuals defined by ethnicity, social and civic status, sexual orientation, gender identity or expression, or indigenous status. Like other disadvantaged and vulnerable groups, persons with disabilities face the social perceptions and attitudes often coupled with additional environmental barriers to the built, educational, and work environments that ultimately hinder accessibility and their inclusion in communities (see *significant risk and impact*).

The potential for risk and impact to persons with disabilities applies when they are present in, have a social or environmental attachment, or move into a proposed project's area of influence (see *project area of influence*). For example, persons with disabilities have a greater chance than other groups of being at high risk from project impacts. They have an increased probability of being affected by cumulative effects because of the multidimensional ways they can be impacted such as by adverse risks of direct and indirect impacts not being avoided or mitigated during past, present, and future projects actions that affect their social and environmental access for inclusion (see *cumulative effect*). There are more ways to significantly impact persons with disabilities through adversely impacting important connections to and networks of family and communities of support; being prohibited from social inclusion due to environmental barriers that prevent access to facilities, education, employment, and other livelihood and well being resources (see *significant risk and impact*). And, there are more ways connected actions from related or unrelated Borrower and others within the many project areas of influence can overlap creating the cumulative impact scenario for persons with disabilities where inaccessibility and lack of inclusion are exacerbated by each missed opportunity to avoid or a least mitigate potential effects (see *connected action*).

(I) **Children Risks and Impacts** – Children have additional considerations affecting their being disproportionately disadvantaged or vulnerable. Children's experience of development projects often differ from adults. Some immediate impacts may be mediated in part by parents or caregivers, but children will directly experience both positive and negative impacts of any project. Children are not only a numerically important population group, but also uniquely vulnerable to even short periods of deprivation, which can have long-term effects that are passed down to future generations. (See *Long- Term Irreversible Effect*).

Children are uniquely vulnerable to direct, indirect, and cumulative impacts. There may be indirect impacts such as loss of employment or livelihood for the family adults which is then becomes a direct impact experienced by children through loss of access to adequate nutrition, healthcare, and education. Economic stress on families can also put children at high risk of abuse, neglect, child labor, and sexual exploitation of children. The overall outcome can be the cumulative effect that has the potential for long-term irreversible effects regarding issues such as loss of life, damaged health, or lack of education needed for employment in later years. The degree of these impacts can differ based on gender, or can be more severe for young children, indigenous children, children from racial or ethnic minorities, child workers, child-headed households, or children with disabilities.

(J) **Sexual Orientation, Gender Identity Or Expression Risks and Impacts** – Persons with a nonconforming sexual orientation, gender identity, or a varying gender expression have difficulties establishing an open and free social environment. They frequently experience a disproportionate share of adverse project risks and impacts producing unsafe living conditions. The risk of impacts typically stem from discrimination, prejudice, harassment, or violence. For example, direct and indirect impacts can come from discrimination, prejudice, harassment, or violence that range from a lack of access to project benefits to potential adverse risk personal harm or loss of life. The high level of intensity of potential impacts such as personal harm or loss of life makes negating this potential through use of the mitigation hierarchy from proposed project actions and activities important. Left unchecked, relatively minor potential risks and impacts from prejudice or harassment may become cumulative effects through long-term irreversible significant impacts that evolve into direct or indirect violent actions affecting health conditions. Lack of access to equitable shares of project benefits can also evolve from relatively minor risks and impacts to economic security to loss of livelihood. (See *Significant Risk and Impact, Cumulative Effect, and Long-Term Irreversible Effect*).(DPI)

## ESS 2: Labor and Working Conditions (page 36)

## **Introduction**

1. ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and economic growth. By ensuring that workers in the project are treated fairly and provided with safe and healthy working conditions, Borrowers can promote sound worker-management relationships and enhance the development benefits of a project.

## **Objectives**

1. To promote safe and healthy working conditions.
2. To promote the fair treatment, non-discrimination and equal opportunity of project workers.
3. To protect project workers, including vulnerable categories of workers such as women, children (of working age, in accordance with this ESS), and migrant workers.
4. To avoid the use of forced and child labor.

## **Requirements (page 36)**

### **A. Working Conditions and Management of Worker Relationships**

5. The Borrower will have in place labor management procedures applicable to the project. These will set out the way in which project workers will be managed, consistent with the requirements of national laws and this ESS.

### ***Non-Discrimination and Equal Opportunity (page 37)***

9. Decisions relating to the employment of project workers will not be made on the basis of personal characteristics unrelated to inherent job requirements. The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices. The human resources policies and procedures will set out measures to prevent and address harassment, intimidation and/or exploitation. Where national law is inconsistent with this paragraph, the project will seek to carry out project activities in a manner that is consistent with the intent of this paragraph to the extent possible without contravening national law.

### ***Grievance Mechanism (page 38)***

12. A grievance mechanism will be provided for all project workers (and, where relevant, their organizations) to raise workplace concerns. All project workers will be informed of the grievance mechanism at the time of recruitment and measures will be taken to make it easily accessible.

13. The grievance mechanism will be designed to address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution, and will operate in an independent and objective manner.

## **C. Occupational Health and Safety (OHS) (page 39)**

20. The relevant OHS provisions in the General EHSs and, as appropriate, industry-specific EHSs will be applied to the project, and this requirement will be set out in the legal agreement and the ESCP.<sup>6</sup> Measures will be designed and implemented, in accordance with national law and the EHSs, to address: (a) identification of potential hazards to project workers, particularly those that may be life-threatening; (b) provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances; (c) training of project workers and maintenance of training records; (d) documentation and reporting of occupational accidents, diseases and incidents; and (e) emergency prevention, preparedness and response arrangements.

21. All project workers will be provided with facilities appropriate to the circumstances of their work, including access to canteens, hygiene facilities, and appropriate areas for rest. Where accommodation services<sup>7</sup> are provided to workers, policies will put in place and implemented on the management and quality of accommodation, including safety, access and the provision of basic services.

### **ESS 3: Resource Efficiency and Pollution Prevention (page 40)**

#### **Introduction**

1. This ESS outlines a project-level approach to resource efficiency, cleaner production processes and pollution<sup>1</sup> management<sup>2</sup> in line with internationally disseminated technologies and practices. Accordingly, this ESS provides a set of guiding principles that a project will address during preparation and implementation. ....

### **ESS 4: Community Health and Safety (page 46)**

#### **Introduction**

1. ESS4 recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration or intensification of impacts due to project activities.

2. ESS4 addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of Borrowers to avoid or minimize such risks and impacts, with particular attention to vulnerable groups.

3. In addition to the general requirements of this ESS, Borrowers must implement the requirements of national and local law supplemented by the measures specified in the EHSs.

#### **Objectives**

To anticipate and avoid adverse impacts on the health and safety of the affected communities during the project life-cycle from both routine and non-routine circumstances.

To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the affected communities.

#### **Scope of Application**

4. The applicability of this ESS is established during the environmental and social assessment described in ESS1.

5. This ESS addresses potential risks and impacts to affected communities from project activities. Occupational health and safety requirements for workers are set out in ESS2, and environmental standards to avoid or minimize impacts on human health and the environment due to ongoing or pre-existing pollution are set out in ESS3.

## **Requirements**

### **A. Community Health and Safety (page 46)**

6. The Borrower will evaluate the risks and impacts to the health and safety of the affected communities during the project life-cycle and will establish preventive and control measures consistent with applicable international conventions and protocols, national legal requirements and in their absence, GIIP, such as, in the first instance, the EHSOs or other internationally recognized sources. The Borrower will identify risks and impacts and propose mitigation measures in accordance with the mitigation hierarchy.

7. The Borrower will ensure that a grievance mechanism is in place in accordance with ESS10 as early as possible in project development to address specific concerns of the community under this ESS.

### ***Infrastructure and Equipment Design and Safety***

8. The Borrower will design, construct, operate, and decommission the structural elements of the project in accordance with national legal requirements and GIIP, taking into consideration safety risks to third parties or affected communities. When new buildings and structures will be accessed by members of the public, the Borrower will consider incremental risks of the public's potential exposure to operational accidents or natural hazards; the Borrower will also apply the principles of universal access.<sup>1</sup> Structural elements will be designed and constructed by competent professionals, and certified or approved by competent authorities or professionals. Structural design will take into account climate change considerations, as appropriate and feasible.

9. When structural elements of projects are situated in high-risk locations, and their failure or malfunction may threaten the safety of communities, the Borrower will engage one or more external experts with relevant and recognized experience in similar projects, separate from those responsible for the design and construction, to conduct a review as early as possible in project development and throughout the stages of project design, construction, operation, and decommissioning. Further requirements on safety of dams are set out in Annex 1.

10. Where appropriate, third-party life and fire safety audits will be undertaken both for existing buildings that are used for communal purposes and for new buildings prior to their commissioning or use.

<sup>1</sup> "Universal access" means free access for people of all ages and abilities in different situations and under various circumstances.

### ***Product and Services Safety (page 47)***

....

12. The Borrower will identify and evaluate potential risks and impacts of its products on consumers' health and safety during the project assessment process. The approach to product safety will adhere to the mitigation hierarchy and ensure that adequate information on the product's health and safety risks is provided to consumers. For situations involving products which are later determined to pose serious health threats, the Borrower will ensure product recall and product withdrawal policy and procedures are in place.

13. The Borrower will comply with specified safety limitations, will not use substances prohibited by national or international regulations, and will label products with warnings about effects on consumer health and safety.

.....

#### ***Community Exposure to Disease (page 48)***

19. The Borrower will avoid or minimize the potential for community exposure to water-borne, water-based, water-related, and vector-borne diseases, and communicable diseases that could result from project activities, taking into consideration differentiated exposure to and higher sensitivity of vulnerable groups. Where specific diseases are endemic in communities in the project area, the Borrower is encouraged to explore opportunities during the project life-cycle to improve environmental conditions that could help minimize their incidence.

....

#### ***Emergency Preparedness and Response (page 49)***

23. Borrowers engaged in projects having the potential to generate emergency events, will conduct a Risk Hazard Assessment (RHA), as part of the environmental and social assessment undertaken pursuant to ESS1. Based on the results of the RHA, a Borrower will prepare an Emergency Response Plan (ERP) in coordination with the relevant local authorities and the affected community.

24. An ERP will include, at a minimum: (a) engineering controls (such as containment, automatic alarms, and shut-off systems) commensurate with the nature and scale of the hazard; (b) identification of and secure access to emergency equipment available on-site and nearby; (c) notification procedures for designated emergency responders; (d) diverse media channels for notification of the affected community and other stakeholders; (e) a training program for emergency responders including drills at regular intervals; (f) public evacuation procedures; (g) designated coordinator for ERP implementation; and (h) measures for restoration and clean-up of the environment following any major accident.

## **ESS 5: Land Acquisition, Restriction on Land Use and Involuntary Resettlement (page 55)**

### **Introduction**

ESS5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons. ....

2. Unless properly managed, involuntary resettlement may result in long-term hardship and impoverishment for those affected, as well as environmental damage and adverse socio-economic impacts in areas to which they have been displaced. For these reasons, involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it will be minimized and appropriate

measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented

## **Objectives**

To avoid involuntary resettlement ....

- To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by: (a) providing timely compensation for loss of assets at replacement cost<sup>6</sup> and (b) ensuring that resettlement activities are implemented with appropriate disclosure of information **which is accessible for all**, consultation, and the informed participation of those affected.
- To assist displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards.
- To improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure.

### ***Compensation and Benefits for Affected Persons (page 59)***

#### ***(CCBRT Comment Please See entire chapter if topic seems relevant!)***

8. When land acquisition or restrictions on land use (whether permanent or temporary) cannot be avoided, the Borrower will offer affected persons compensation at replacement cost, and other assistance as may be necessary to help them improve or at least restore their standards of living or livelihoods, subject to the provisions of paragraph 22 through 32 of this ESS.<sup>14</sup>

9. Compensation standards for categories of land and fixed assets will be disclosed and applied consistently (though compensation rates may be subject to upward adjustment where negotiation strategies are employed). In all cases, a clear basis for calculation of compensation will be documented, and compensation distributed in accordance with transparent procedures.

10. Where livelihoods of displaced persons are land-based, or where land is collectively owned, the Borrower will offer the displaced persons an option for replacement in kind, unless it can be demonstrated that equivalent replacement land is unavailable. As the nature and objectives of the project may allow, the Borrower will also provide opportunities to displaced communities and persons to derive appropriate development benefits from the project. In the case of affected persons under paragraph 6 (c), resettlement assistance will be provided in lieu of compensation for land, as described in paragraphs 25 and 30 (c).

...

### ***Community Engagement (page 60)***

14. The Borrower will engage with affected communities, including host communities, through the process of stakeholder engagement described in ESS10. Decision-making processes related to resettlement and livelihood restoration will include options and alternatives from which affected persons may choose, where applicable. Disclosure of relevant information and participation of affected communities and persons will take place throughout the planning, implementation, monitoring, and evaluation of the compensation process, livelihood restoration activities, and relocation process.<sup>16</sup> Additional provisions apply to consultations with Indigenous Peoples, in accordance with ESS7.

## **ESS 6: Biodiversity and Sustainable Management of Living Natural resources (Page 66)**

....

### **Objectives**

- To protect and conserve biodiversity using a precautionary approach.
- To promote the sustainable management of living natural resources through the adoption of practices that integrates conservation needs and development priorities.

## **ESS 7: Indigenous Peoples ( page 74)**

### **Introduction**

1. ESS7 contributes to poverty reduction and sustainable development by ensuring that projects supported by the Bank enhances opportunities for Indigenous Peoples to participate in, and benefit from, the development process in ways that do not threaten their unique cultural identities and well-being.

....

## **ESS 8: Cultural Heritage (page 84)**

### **Introduction**

1. ESS 8 recognizes the importance of cultural heritage for current and future generations, as a source of valuable scientific and historical information, as an asset for economic and social development, and as an integral part of people's cultural identity, practices and continuity. ESS 8 aims to ensure that the Borrower protects cultural heritage throughout the life of the project.
2. ESS 8 recognizes the importance of respecting national and international laws and regulations relating to cultural heritage, including those laws and regulations that relate to the cultural heritage of Indigenous Peoples.

## **ESS 9 Financial Intermediaries (page 89)**

### **Introduction**

1. The Bank is committed to supporting sustainable financial sector development and enhancing the role of domestic capital and financial markets. Through its engagement, the Bank supports the development of FI capacity to manage environmental and social risks. The nature of intermediated financing means that FIs will assume delegated responsibility for environmental and social assessment, management and monitoring, as well as overall portfolio management. The nature of the delegated responsibility may

take various forms, depending on a number of considerations, including the capacity of the FI and the nature and scope of the funding to be provided by the FI.

2. FIs are required to adopt and implement effective environmental and social procedures to ensure that they lend in a responsible manner.

### **Objectives**

- To set out how the FIs will assess and manage environmental and social risks associated with project related investments or subprojects, and promote good environmental and social business practices in the subprojects they finance.
- To promote good environmental and sound human resources management within the FIs.

### **Scope of Application**

3. For the purposes of this ESS, the term “subproject” refers to projects financed by FIs. Where the project involves on-lending by an FI to another FI, the term “subproject” will include the subprojects of each subsequent FI

4. Where Bank support will be provided to the FI to fund a clearly defined set of subprojects,<sup>1</sup> the requirements of this ESS will be applicable to the identified subprojects.

### **Requirements**

6. FIs will screen, appraise and monitor all subprojects,<sup>2</sup> in accordance with the environmental and social risk profile of the individual subprojects. All subprojects will be structured to meet the relevant environmental and social requirements of national law.

....

14. The FI’s environmental and social procedures will include risk appraisal and monitoring mechanisms, as appropriate, to:

....

(b) Classify the environmental and social risk of proposed subprojects;

(c) Require sub-borrowers to undertake environmental and social assessment of proposed subprojects commensurate with national law and the identified environmental and social risks and impacts; where a subproject is classified as *High Risk*, the environmental and social assessment will be consistent with ESSs1 to 8 and ESS10;

(d) Ensure that subprojects are structured to meet national regulatory requirements relating to environmental and social risks and impacts and that where subprojects are classified as *High Risk*, they are also structured to meet ESSs1 to 8 and ESS10;

...

(f) Keep and regularly update environmental and social records on subprojects; and

(g) Monitor the environmental and social risk of the FI portfolio.



15. The FI will ensure that the requirements of this ESS and ESS2 are clearly communicated to all relevant personnel, and provide appropriate training to ensure that personnel have the necessary capabilities and support to implement them.

....

17. The FI will put in place procedures for external communications on environmental and social matters commensurate with the risk and impacts of the subprojects, and the risk profile of the FI's portfolio. The FI will respond to public enquiries and concerns in a timely manner. The FI will list on its website the link to any environmental and social assessment reports for *High Risk* subprojects which it finances.

...

## **ESS 10: Information Disclosure and Stakeholder Engagement (page 92)**

### **Introduction**

1. This ESS recognizes the importance of open and transparent engagement between the Borrower, communities affected by the project, project workers, and, where appropriate, other stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, and enhance project acceptance. In particular, effective community engagement appropriate to the nature and scale of the project promotes sound and sustainable environmental and social performance, and can lead to improved financial, social and environmental outcomes, and enhanced community benefits. It is central to building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social risks and impacts. Stakeholder engagement is most effective when initiated at an early stage, and continues throughout the life-cycle of the project. It is an integral part of the assessment, management and monitoring of the project's environmental and social risks and impacts.

2. This ESS identifies stakeholder engagement as an ongoing process involving: (a) identification of stakeholders and their concerns; (b) disclosure of appropriate project information; (c) meaningful consultation with stakeholders and (d) **(d) ensure accessibility of facilities free from discrimination and free from environment barriers for persons with disabilities (DPI)** establishment of a mechanism by which people can make comments on project proposals and performance or raise grievances

3...

### **Objectives**

1. To outline a systematic approach to stakeholder engagement that will help Borrowers build and maintain a constructive relationship with their stakeholders, in particular project-affected communities.
2. To promote improved environmental and social performance of Borrowers through effective engagement with their stakeholders.
3. To promote and provide means for adequate engagement with project-affected communities throughout the project cycle on issues that could potentially affect them and to ensure that meaningful environmental and social information is disclosed to them and to other stakeholders.
4. To ensure that all stakeholders have ways to access project information and raise issues;

5. To ensure that the project-affected communities **including vulnerable groups such as persons with disabilities** have accessible means to raise issues and grievances, and that Borrowers respond to and manage such issues and grievances appropriately.

### **Scope of Application (page 93)**

4. ESS10 applies to all projects supported by the Bank through Investment Project Financing. The Borrower is expected to engage with relevant stakeholders as an integral part of the project's environmental and social assessment and project implementation, as outlined in ESS1.

5. For the purpose of this ESS, "stakeholder" refers to **persons or groups potentially affected by project actions in its area of influence, and may be considered synonymous with** project-affected communities, **Where appropriate, other stakeholders**

### **Requirements**

6. Borrowers will engage with stakeholders by providing them with access to timely, relevant, understandable and accessible information, and by consulting in a culturally appropriate manner, **and age appropriate** manner, and free of manipulation, interference, coercion and intimidation. **Such consultations will be done through inclusive means that are accessible to persons with disabilities both through physical access to facilities where the information is provided and by ensuring it is offered in multiple forms such as sign language, Braille, large print, audio, plain-language, human-reader, or accessible electronic media technology (DPI)**

7. Stakeholder engagement will involve, as appropriate, the following elements: stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, grievance acceptance and response, and ongoing reporting to project-affected communities **and stakeholders.**

8. The nature, scope and frequency of stakeholder engagement will be commensurate with and proportionate to the nature and scale of the project and its potential impacts on affected communities, the sensitivity of the environment, **and persons/groups disadvantaged or vulnerable** and the level of public interest. In order to tailor the engagement to the specifics of the Borrower and the project, it is essential that Borrowers identify and analyze the project's stakeholders as outlined below.

#### **A. Information Disclosure**

9. For all projects, Borrowers will consult with stakeholders to identify issues and concerns in order to inform the environmental and social assessment and the design and implementation of the project.

10. Disclosure of relevant project information helps stakeholders understand the risks, impacts and opportunities of the project. If communities may be affected by environmental or social impacts from the project, the Borrower will provide them with access to the following information:

(a) The purpose, nature and scale of the project;

(b) The duration of proposed project activities;

(c) Any risks to and potential impacts on communities **or persons** and proposed mitigation

**Hierarchy plans, highlighting any potential risks and impacts disproportionately on disadvantaged or vulnerable groups;**

(d) The envisaged stakeholder engagement process, if any, and opportunities and ways in which stakeholders can participate, **noting how inclusive means such as accessibility for persons with disabilities both through physical access to facilities where the information is provided multiple forms (see paragraphs 2 and 6);**

(e) The time and venue of any envisaged public consultation (c) Any risks to and potential impacts on communities and proposed mitigation plans;

(d) The envisaged stakeholder engagement process, if any, and opportunities and ways in which stakeholders can participate;

(e) The time and venue of any envisaged public consultation meetings, and the process by which meetings are notified, summarized, and reported; and

(f) The process and means by which grievances are raised and managed.

11. The information will be disclosed in local language(s) and in a manner that is accessible and culturally appropriate **and age appropriate**, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project because of their status or groups of the population with specific information needs (such as, literacy, gender, differences in language or accessibility of technical information) **sign language, Braille, large print, audio, plain-language, humanreader) and/or physical barriers to persons with disabilities to access the information environment or facilities.**

12. The Borrower, **in collaboration with the community**, will identify the various individuals or groups who:

(a) are affected or likely to be affected by the project **area of influence** (project-affected communities); or

(b) may have an interest in the project (other stakeholders).

13. The Borrower, **in collaboration with the community**, will identify individuals and groups that may be differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status. Where relevant, the Borrower, **in collaboration with the community**, will also identify different interests within the identified groups, for example, representing different ages, genders, **disabilities** and ethnic and cultural diversity who may have different concerns and priorities about project impacts, mitigation mechanisms and benefits, and who may require different, or separate, forms of engagement. The Borrower, **in collaboration with the community**, will also identify how each group of stakeholders may be affected and the likely extent of potential impacts. An adequate level of detail will be included in the stakeholder identification and analysis so as to determine the level of communication that is appropriate for the project.

#### ***Stakeholder Engagement Plan***

14. The Borrower, **in collaboration with the community**, will develop and implement a Stakeholder Engagement Plan (SEP). The SEP will describe the timing and methods of engagement with the project-affected communities and other stakeholders throughout the life-cycle of the project. The SEP will also describe the range of information to be communicated to stakeholders, as well as information to be sought from them. Engagement will be appropriate to the nature and scale of the risks, impacts and development stage of the project, and the nature and level of stakeholder impacts and concerns **as determined through the application of ESS1, where appropriate, the requirements of ESSs2-9. For projects with little or no impact on project-affected communities, stakeholder engagement may be minimal.** The SEP will be disclosed **prior to Board approval.**

....

16. The SEP will describe the measures that will be used to remove obstacles to participation, such as those based on gender, age, **disability**, or other differences, and how the views of differently affected groups will be captured. Where applicable, the SEP will include differentiated measures to allow the effective participation **and safety** of those identified.....

17. In cases where the exact location of the project is not known at the time of initial due diligence by the Bank, the SEP will take the format of a framework approach, outlining general principles and a collaborative strategy to identify stakeholders and plan for an engagement process in accordance with this ESS and consistent with ESS1 that will be implemented once the location is known. For projects that are regional or national in scope, involving multiple locations, the SEP may be devised on a sample basis; covering major geographical jurisdictional and demographic variation measures, including groups who may be particularly vulnerable to impacts or to exclusion from project benefits. A framework SEP will require individual SEPs for subprojects where appropriate. Those stakeholders potentially at risk or impacted by subprojects must also be consulted to effectively assess the possible significant and/or cumulative effects of such projects (See ESS1, UAIP, Annex 2)

### **Meaningful Consultation**

18. The need for and nature of any specific consultation will be determined on the basis of the stakeholder identification and analysis. Where project-affected communities may be subject to significant adverse potential risks and impacts from a project, the Borrower will undertake a process of meaningful consultation in a manner that provides stakeholders with opportunities to express their views on project risks, impacts, and mitigation measures, and allows the Borrower to consider and respond to them.

Meaningful consultation will be carried out on an ongoing basis as the nature of issues, impacts and opportunities evolves. The Borrower will maintain adequately documented evidence of stakeholder engagement.

19. The consultation process with project-affected communities or stakeholders will be undertaken in a manner that is inclusive, and culturally appropriate, and age appropriate and which represents the views and specific needs of various groups as identified in the SEP and or of which the Borrower is made aware during the implementation of the SEP. Where appropriate, the consultation will also include stakeholders, beyond the project-affected communities, whether identified by the Borrower or self identified by the stakeholder themselves or a representative group or organization or any groups or individuals who have been identified as other stakeholders.

Meaningful consultation is a two-way process that will:

- (a) Begin early in the process of identification of environmental and social risks and impacts with extra attention to the potential for any risks and impacts disproportionately on disadvantaged or vulnerable groups and continue on an ongoing basis as risks and impacts arise;
- (b) Be based on the prior disclosure and dissemination of all relevant, transparent, objective, meaningful and easily accessible information which is in a culturally appropriate local language(s) and format and is understandable to project-affected communities (see paragraphs 2, 6, and 10), ensuring at least two weeks in advance of the consultation;
- (c) Incorporate feedback, where appropriate;
- (d) Focus inclusive engagement on project-affected communities;
- (e) Be free of external manipulation, interference, coercion, or intimidation;
- (f) Enable meaningful participation, where applicable; and
- (g) Be documented by the Borrower and shared with those participating in the consultation to ensure information was accurately captured.

## **B. Engagement during Project Preparation**

### **Stakeholder Identification**

.....

20. The Borrower will tailor its consultation process to any specific language preferences of the project affected communities, their decision-making process, and the needs of disadvantaged or vulnerable groups (see paragraph 2). The Borrower will inform those who have participated in the public consultation process in a timely manner of the final decision on the project, associated environmental and social mitigation measures and any benefits of the project for the local communities, along with reasons and considerations on which the decision is based, and the grievance or complaint mechanism or process available.

### **C. Engagement during Project Implementation and External Reporting**

21. The Borrower will provide ongoing information to the project-affected communities **addressing all stakeholders**, appropriate to the nature of the project and its potentially environmental and social risks and impacts, **and the level of public interest throughout the life of the project**. Additional information may need to be disclosed at key stages in the project cycle, for example prior to start-up of operations, and on any specific issues that the disclosure and consultation process or grievance mechanism have identified as of concern to the project-affected communities. This ongoing engagement will build upon the channels of communication and engagement established during the stakeholder engagement carried out as part of the environmental and social assessment process and reviewed periodically. Borrowers will be expected to use appropriate stakeholder engagement practices to disclose information and receive feedback on the effectiveness of the project and the implementation of the mitigation measures in the **UAIP and ESCP** as well as the project-affected communities' ongoing interests and concerns about the project. **Where appropriate, other stakeholders will also be included in the ongoing engagement.**

22. If there are material changes to the project that result in additional risks and impacts of concern to the project-affected communities, **all stakeholders will participate in meaningful consultations with the Borrower to develop an updated ESCP that will be disclosed to the community which will inform them how these risks and impacts are being addressed and disclosed an updated ESCP in accordance with the SEP. For any measures associated with the UAIP affecting the disadvantaged and vulnerable groups the Borrower must demonstrate adequate capacity, experience, and expertise, including the use of independent external expertise, to make the determination and recommendation regarding such adaptive management project changes. The SEP will be reevaluated and updated to account for the additional risk.**

### **D. Grievance Redress**

23. The Borrower will respond to concerns of **all stakeholders of the** project-affected communities related to the project in a timely manner. For this purpose, the Borrower will provide a grievance mechanism, process or procedure to receive and facilitate resolution of stakeholders' concerns and grievances regarding the Borrower's environmental and social performance. The grievance mechanism will be scaled to the risks and potential adverse impacts of the project. Where possible, such grievance mechanism will utilize existing formal or informal grievance mechanisms suitable for project purposes, supplemented as needed with project-specific arrangements. Further requirements on grievance mechanisms are set out in Annex 1.

(a) The grievance mechanism, process or procedure is expected to address concerns promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all segments of the project-affected communities, at no cost and without retribution. The mechanism, process or procedure will not prevent access to judicial or administrative remedies. The Borrower will inform the project-affected communities about the grievance process in the course of its community engagement activities, and will make publicly available a record documenting the responses to all grievances received; and

(b) Handling of grievances will be done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the needs and concerns of the project-affected communities. Where there is threat of reprisal, the mechanism will also allow for anonymous complaints to be raised and addressed.

### **E. Organizational Capacity and Commitment (page 98)**

24. The Borrower will define clear roles, responsibilities and authority as well as designate specific personnel to be responsible for the implementation and monitoring of stakeholder engagement activities and compliance with this ESS

## **ESS10. Information Disclosure and Stakeholder Engagement**

### **ESS10 – ANNEX 1. GRIEVANCE MECHANISM**

*[to include further requirements, as appropriate]*

1. The scope, scale and type of grievance redress mechanism, process or procedure required will be proportional to the nature and scale of the project's risks and potential adverse impacts.

2. The grievance process is to be:

(a) **Accessible** – The freedom and ability of all stakeholders, especially disadvantaged and vulnerable individuals or groups, to participate in a meaningful to person-to-person and person-to-community way. Accessibility ensures disadvantaged and vulnerable people are given the same opportunity as any other citizen to access shared experiences and environmental surroundings with groups, neighborhoods, and communities. For persons with disabilities accessibility is more a function of social and environmental design to remove barriers to participation on an equal basis to others for all aspects of the stakeholder engagement, consultations, and grievance processes. It is creating access to the built environment, infrastructure, transportation, information and communications, and other facilities and services open or provided to the public. The communication process should offer information that assures it is available through multiple forms and facilities accessible to the greatest number of people interested or possibly affected by a project, with specific attention given to the disadvantaged and vulnerable. Accessibility should respect diversity and dignity of all peoples and use measures as appropriate such as accepted local language, culturally sensitive, and for persons with disabilities through appropriate means as Braille, tactile communication, **sign language**, large print, audio, plain-language, human-reader, internet technology, and other usable electronic media technology.

(b) **Inclusive** – This means empowering all stakeholders to participate in, and benefit from, the disclosure and stakeholder engagement process. Inclusive encompasses promoting equality of opportunity to mainstream disadvantaged and vulnerable people into the stakeholder engagement, consultation, and grievance processes equal to any other community member. The inclusion of all people, especially disadvantaged, vulnerable **including** persons with disabilities, works hand-in-hand with accessibility to informational and interactive resources created under (a) and other parts of ESS10. It uses the removal of social and environmental barriers against those who are often excluded, such as women, children, youth, persons with disabilities, and minorities, or individuals and groups defined by ethnicity, social and civic status, sexual orientation, gender identity, or indigenous status; and, ensures that their voices and concerns are heard and responded to through effective means of disclosure, consultation, communication, and grievance processes.

3. The grievance redress mechanism, process or procedure will include the following elements:

- (a) An array of **accessible and inclusive** modes by which users can submit their complaints, including, but not limited to, submissions in person, by phone, text message, mail, email or web site;
- (b) A log where complaints are registered in writing, maintained as a database **that is accessible**;
- (c) **Accessible** publicly advertised service standards outlining the length of time users can expect to wait for acknowledgement, response and resolution of their complaints;
- (d) Transparency about the grievance procedure, **including any appeals process** governing structure and decision makers;

### **General comments**

**1. Capacity building for vulnerable groups to effectively engage in consultative processes**

**2. Power imbalance between borrowers and vulnerable groups.**

**3. Accessible grievance-submissions mechanism for vulnerable groups.**

Yellow= comments of Tanzanian Persons with Disabilities members of DPOs and PDOs participating in a one day stakeholder consultation meeting 29.1.2015

RED = comments Disabled People International

Please note not all footnotes of the World Bank document and the DPI suggestions are copied in.