The Council for Global Equality (www.GlobalEquality.org) is a civil society organization based in the United States that promotes an integrated U.S. foreign policy reflecting the unique human rights and development challenges impacting lesbian, gay, bisexual and transgender (LGBT) individuals globally. The Council offers these comments in response to the current phase of consultations on the World Bank's second draft Environmental and Social Framework (ESF). The following questions have been identified by the Council as crucial issues to be resolved before the World Bank adopts its proposed Environmental and Social Framework.

**General Questions**

How would the expectations of the safeguards be verified by Bank country directors? What information regarding recipient country behavior would be conveyed by those country directors to Bank staff in Washington?

Should recipient countries effectively ignore or minimize the safeguards’ expectations, what action would the Bank take?

How would the Bank ensure that the principal of instilling country ownership leads to ensure recipient country internalization of the reasons behind the safeguards, and of the importance of national action to ensure that it is respected in full – rather than leaving it to the host country to gauge what measures are acceptable in the implementation of the safeguards?

What means of on-the-ground verification might the Bank use to assess recipient country compliance with the new safeguards?

Will there be a public assessment of recipient countries’ compliance with the safeguards during the course of a loan prior to consideration of a new loan?

**Vulnerabilities on the Basis of Sexual Orientation and Gender Identity**

Please describe whether and how the Bank will engage with LGBT populations in recipient countries to ascertain those populations’ needs with respect to the Bank loan under consideration before it is granted? Will the Bank engage with those populations during the course of the loan's implementation? If so, how?
As required under the proposed Environmental and Social Framework, how will the Bank ensure effective consultation with vulnerable LGBT populations in countries where same-sex relationships are criminalized, where LGBT organizations are not recognized or are blatantly criminalized, and where the community’s safety cannot be guaranteed in face-to-face consultations with the recipient country?

When in-country consultations are not feasible or safe (as described above), will the Bank consider opportunities for consultations in Washington or elsewhere outside of the recipient country? If so, how will populations inside the country be represented in these external consultations? Will the Bank set aside funds for these consultations?

How will the Bank respond when members of the LGBT population, or any other vulnerable community, are arrested, subjected to violence or otherwise sanctioned for their attempts to participate in project consultations or raise project concerns with Bank staff?

Where LGBT populations face multiple forms of discrimination, as they often do when they also belong to ethnic, religious or indigenous minority communities in a country, how will the Bank ensure a multi-faceted consultation process that unpacks the unique vulnerabilities of those who face such multiple forms – and multiplying facets – of discrimination?

Will transgender individuals, who face heightened violence and discrimination in all countries because of their gender identity, be included in gender-specific project consultations, assessments, remedial actions and accountability efforts under current and future gender equality measures implemented through the safeguards?

Were the specific reference to sexual orientation and gender identity to be removed from the safeguard, how would the Bank assure that these specific populations are fairly supported and included in the purpose of the safeguards and all future loan?

How will the results of each LGBT-/Gender- inclusive loan under the safeguards be evaluated in such as way as to add to the Bank’s understanding of the impact of inclusion on Bank development priorities?