Specific participant comments

1. General comments

- **Adding more requirements for countries that have low capacity to manage environmental and social issues might hinder the World Bank’s ability to fulfil its mission to support the development of these countries.** The countries that are the poorest and have the least capacity are the ones who need the most support and they would have difficulty in acquiring World Bank loans given the lack of capacity to apply the new standards.

- From the operational viewpoint, the proposed Environmental and Social Framework (ESF) that would replace the existing safeguard policies **does not seem to be the best approach.** It would **increase preparation cost and time, and would require the hiring of many experts, with specialized technical knowledge.** This might discourage donors from executing projects in partnership with the World Bank.

- The World Bank should examine mechanisms to ensure that projects with a potential adverse impact reinvest their benefits in the community.

- The World Bank **should improve its ex-post evaluation** that currently is only done right after the project closing. The World Bank should adopt a **longer term approach.** This would guarantee that the agencies tasked with operating the project ensure
there is appropriate funding for the projects’ operations and resources required for monitoring the project’s performance, including impact and beneficiary assessments, etc.

- Generally, the teams that design the projects are not the same teams that implement the projects. Procedures and documentation to be used by all parties should be simplified, for instance, by using standardized and straightforward templates, such as check-lists that can be used by any person over time.

### 2. A Vision for Sustainable Development

N/A

### 3. Environmental and Social Standard (ESS1): Evaluation and management of environmental and social risks and impacts

- An important issue is to undertake an appropriate risk assessment at the beginning of project preparation.
- Using country-level systems requires a rigorous initial evaluation to ensure that an appropriate risk level is adopted.
- It seems that ex-ante evaluations will be more complex under the new ESF. It would be important to know and assess the procedures that the Bank may use for environmental and social ex-ante project evaluation.
- The World Bank’s emphasis on risk management and its risk-based environmental and social categorization is a positive improvement.

### 4. Environmental and Social Standard 2 (ESS2): Labor and working conditions

N/A

### 5. Environmental and Social Standard 3 (ESS 3): Resource Efficiency and pollution prevention

- In addition to carbon emissions, all the projects should be required to assess their water footprint. This is a very relevant issue in certain countries, as for instance in Paraguay.

### 6. Environmental and Social Standard 4 (ESS 4): Community Health and Safety

N/A

### 7. Environmental and Social Standard 5 (ESS 5): Land acquisition, restriction on land use and involuntary resettlement

N/A

### 8. Environmental and Social Standard 6 (ESS 6): Biodiversity conservation and sustainable management of living natural resources

N/A

### 9. Environmental and Social Standard 7 (ESS 7): Indigenous peoples

N/A
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<tr>
<td><strong>10. Environmental and Social Standard 8 (ESS 8): Cultural Heritage</strong></td>
<td>N/A</td>
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<td><strong>11. Environmental and Social Standard 9 (ESS 9): Financial intermediaries</strong></td>
<td>N/A</td>
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<td><strong>12. Environmental and Social Standard 10 (ESS 10): Information Disclosure and Stakeholder Participation</strong></td>
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