



Designing World Bank Safeguards to Ensure Road Traffic Injury Prevention: Submission to World Bank Consultation, February 2015

The FIA Foundation welcomes the opportunity to provide comments on the World Bank's Environmental & Social Framework. We are a UK registered philanthropic grant-making organisation with a charitable mission to promote public safety and public health, the protection and preservation of human life, and the conservation, protection and improvement of the physical and natural environment.

The FIA Foundation supports advocacy and innovation in global road safety. In the area of road infrastructure safety the Foundation is a core donor to the non-profit International Road Assessment Programme (iRAP), which measures safety performance of roads and highways in more than 80 countries and makes policy and technical recommendations to improve road safety performance. The FIA Foundation also supports and associates with iRAP's submission to this consultation.

Road traffic injuries are a major public health issue, a drain on developing economies and a leading cause of death in most of the World Bank's countries of operation.ⁱ The need for international cooperation to assist countries in reducing road traffic injuries has been recognised with the launch in 2011 of the UN Decade of Action for Road Safety 2011-2020, and road safety targets are included in the draft Sustainable Development Goals for the post-2015 period. The World Bank's Senior Director of Global Transport Practice has described the pivotal role that road fatalities and injuries play in preventing achievement of wider development targets: *"The World Bank is committed to eradicating extreme poverty in the developing world—our first goal. But this will not happen as long as 90% of the killed and injured on the roads come from countries with limited or no safety nets, with whole families getting thrown back into poverty almost overnight, and when the main breadwinner is killed or maimed for life in a road crash."*ⁱⁱ

The World Bank is supporting a number of effective road safety demonstration projects and is providing technical assistance to many governments to integrate the 'Safe System' approach within national institutions and strategies.ⁱⁱⁱ The role of the Global Road Safety Facility, hosted at the World Bank (and to which the FIA Foundation is a donor and board member) has been vitally influential in this regard. But the World Bank still suffers from the lack of an organisation-wide, harmonised, culture and approach to road safety, defined and led from the very top. This is surprising, particularly given the very large amounts of financing provided for road infrastructure. In no other area of the World Bank's work would so many avoidable casualties be tolerated.

The current Safeguards review provides an important opportunity to achieve the single most important measure that could both transform World Bank lending policies and contribute to major reductions in road traffic deaths and injuries: to introduce and require standard, objective and transparent, road safety performance measurement for all World Bank-financed road infrastructure. Unless we know how roads are performing, how many people are being killed and injured, and how and why, it will be impossible to effectively design for safety and to put in place countermeasures when injuries occur. Safety assessment at the point at which road rehabilitation or new construction is being planned can be highly cost-effective in identifying design failures, recommending countermeasures and subsequently providing an overview measurement of performance.

The star rating safe road assessment protocols developed by iRAP are a highly effective measurement tool which can provide clarity to road authorities and engineers, policymakers, civil society and the public alike.^{iv} The World Bank and relevant state governments have applied minimum star rating standards as part of road projects in Karnataka, Assam, Gujarat and Kerala in India, with support from the Global Road Safety Facility and Bloomberg Philanthropies (see below). The FIA Foundation would strongly recommend that the World Bank adopts star rating measurement as an accountability tool for all its road loans.

At the Rio+20 Summit the main multilateral development banks came together to issue a pledge to invest in safe and sustainable transport over the coming decade. Effective measurement of how this pledge is implemented will be crucial, and nowhere is this more important than in accounting for the road safety impact of road schemes. More than three thousand people die on the world's roads every day, many thousands more are injured. Better attention to road infrastructure design could help to prevent many of these tragedies. So this Safeguards consultation, and the new policy that will be derived from it, provides an absolutely vital opportunity to rate safety consistently and transparently.

Summary of our main recommendations:

1. The policy statements and *ESS1* should include road safety as a major priority within the Environmental and Social Framework.
2. *ESS4 – Community Health and Safety* be amended to include an Annex on the Safety of Transport Infrastructure that reflects the scale of World Bank investment in this area and the significant number of deaths and injuries that can be sustained on poorly designed road projects.
3. *ESS4 – Community Health and Safety* be amended to require the use of road infrastructure star rating targets to ensure there is a specific, measurable and achievable safety performance measure for all road users as part of all World Bank financed transport infrastructure.

Designing World Bank Safeguards to Ensure Road Traffic Injury Prevention: Detailed Recommendations

World Bank Environmental and Social Policy

- All road projects should be deemed high or substantial risk due to the direct negative impacts of road death and injury.
- Clause 54 highlights that the Bank will develop and maintain directives, procedures and appropriate guidance and information tools to assist in implementing the Policy. The long-term partnership between World Bank and iRAP in this area has led to the development of the star rating, fatality estimation and economic valuation of road safety engineering improvements worldwide. The established iRAP experience across more than 30 low and middle-income countries can be expanded into appropriate guidelines to meet the specific needs of the safeguards (refer ESS1 and ESS4). For example the recent World Bank Global Road Safety Facility work funded by Bloomberg Philanthropies in India has undertaken iRAP assessments on 10,444km of road with an estimated 75,893 fatalities and serious injuries each year costing the Indian community \$2.8 billion annually. The engineering treatments recommended as part of those projects will significantly improve the star rating of the roads for all road users resulting in an estimated 58% reduction in death and injury with a benefit-cost ratio of 2.7. More than 31 billion vehicle kilometres of travel will be made safer supporting the 58 million people who live within 3km of the roads.^v

ESS1 – Assessment and Management of Environmental and Social Risks and Impacts

Clause 54 of ESS1 highlights the need for the borrower to notify the Bank of any incident...including any fatalities or serious injuries. To fully comply with this requirement Borrowers would need to notify the Bank of any serious road crash on newly funded roads. Clause 49 of ESS1 requires that borrowers *'will ensure that adequate systems, resources and personnel are in place to carry out monitoring'*. In our view detailed crash monitoring and reporting requirements should therefore be required for all road projects to specifically support this requirement in addition to other risk avoidance and mitigation recommendations below.

ESS4 – Community Health and Safety

With the stated objective to *"anticipate and avoid adverse impacts on the health and safety of the affected communities"* and to *"ensure that the safeguarding of personnel....that avoids or minimises risk to the affected communities"* the known road safety risks must be addressed.

Clause 25 of ESS1 also states that the Environmental and Social Assessment (ESA) will apply a mitigation hierarchy which favours the avoidance of impacts over minimisation or reduction of impacts to acceptable levels. ESS4 could apply this philosophy in addressing the well-known risk of road trauma by referencing and applying the safe-system and star-rating practices being applied in Bank shareholder countries.

ESS4 - Traffic and Road Safety

We welcome the specific inclusion of Traffic and Road Safety in ESS4 clauses 15-17. However, it is of great concern that there is no proposal for requiring transparent, objective and harmonised performance measurement of road transport loans. In the absence of effective data collection on deaths and serious injuries in many countries, the World Bank should require publicly-available safety performance measurement which is applied to all road projects. This is essential for identifying and understanding crash risk, implementing effective countermeasures, ensuring true accountability and for communicating to bank shareholders, clients, policymakers, and the public, that roads can be, and are being, made safer.

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

- Clause 2: traffic and road safety risk is high for all transport sector projects and therefore requires a commensurate level of assessment and monitoring.
- Clause 19 says that the Borrower will undertake....”measures and actions to address any capacity development issues pertaining to the Borrower”. A mandatory training module on road safety (capturing management, infrastructure, road user, vehicle and post-crash care needs) is recommended for all government, consultant and Bank project staff.
- Clause 26a should also specifically state “traffic and road safety” given the known-scale of the negative impacts.

ESS4 Community Health and Safety

Building on the Multi-lateral Development Bank (MDB) Road Safety Guidelines^{vi} the following recommendations are suggested:

- Given the large scale of road trauma, it is recommended that road traffic safety is specifically included in clause 1 of the Introduction. For example *“ESS4 recognizes that project activities, equipment and infrastructure can increase community exposure to risks and impacts. **Road related death and injury is a specific risk to be managed.** In addition....”*.
- Clause A.15 suggests that the Borrower will identify traffic and road safety risks and where appropriate address them. Addressing these risks is always appropriate and therefore the words *“where appropriate”* should be deleted from this clause.
- With World Bank partnerships and supplier networks already in place to competitively deliver iRAP assessments, it is recommended that Clause A.16 is updated as follows:
 - The Borrower will make use of tools such as the Road Safety Management Capacity Review and iRAP assessments to identify road safety measures and incorporate technically and financially feasible road safety components into the project design to avoid and/or mitigate potential road safety impacts on the local affected communities.

- It is recommended that Clause 16 is expanded and updated to capture the well-established use of road infrastructure star rating targets and investment plans, as follows:
 - Where road and transport infrastructure forms part of the project, the Borrower will set appropriate infrastructure safety star rating targets for all applicable road users at the expected operating speed of the road.
 - The Borrower will incorporate the estimated economic costs of road trauma in the financial business case for the project based on the before and after fatality and serious injury estimations from the iRAP assessment or equivalent analysis.
 - In conjunction with meeting the agreed star rating target the Borrower will undertake a road safety audit for each phase of the project and routinely monitor incident and accident reports to identify and resolve problems or negative safety trends.
 - For Borrowers with vehicles or fleets of vehicles (owned or leased), the Borrower will provide adequate training to workers on driver and vehicle safety. The Borrower will include safety standards (e.g. Global NCAP ratings^{vii}) in vehicle purchasing policies and ensure regular maintenance of all project vehicles.
- Road safety training and monitoring needs for the project must also be defined in the ESCP. This should include actions to ensure capacity building and compliance (as per clause 50 ESS1), incident reporting (as per Clause 54 ESS1) and steps to measure progress.
- Given the critical nature of road death and injury in low and middle-income countries, it is recommended that a specific Annex in ESS4 that addresses fully the Safety of Transport Infrastructure (as is the case for Dam Safety) is added. This can capture action across all 5 pillars of road safety action as defined in the UN Decade of Action for Road Safety^{viii} and include the detailed guidance on the appropriate use of star rating targets being currently developed in consultation with Bank staff.

ⁱ Commission for Global Road Safety, 2013: Safe Roads For All – A Post-2015 Agenda for Health & Development
<http://www.fiafoundation.org/media/44210/mrs-safe-roads-for-all-2013.pdf>

ⁱⁱ Remarks at Safe Kids Worldwide ‘Safe Kids-Safe Roads’ conference by Mr Pierre Guislan, Washington DC, 11 December 2014
<http://web.worldbank.org/WBSITE/EXTERNAL/TOPICS/EXTTRANSPORT/EXTTOPGLOROASAF/0,,contentMDK:23645138~pagePK:64168445~piPK:64168309~theSitePK:2582213,00.html>

ⁱⁱⁱ The safe system principles are currently the subject of a major OECD / International Transport Forum working group
<http://www.internationaltransportforum.org/jtrc/safety/safe-system/index.html>

^{iv} The iRAP star rating assessments were developed in partnership with the World Bank Global Road Safety Facility (GRSF) and guidance on the setting of star rating policy and project targets is under development in consultation with World Bank staff and other global iRAP partners. See <http://www.irap.org/en/about-irap-2/star-ratings>

^v India Fact Sheet prepared by iRAP in consultation with GRSF for Bloomberg Philanthropy reporting purposes

^{vi} http://publicaciones.caf.com/media/40517/1_road_safety_guidelines.pdf

^{vii} www.globalncap.org

^{viii} http://www.who.int/entity/roadsafety/decade_of_action/en/