Rome, 22.12.2014

The Board of Executive Directors of IBRD / IDA
The World Bank
1818 H St. NW
Washington, D.C. 20433
27 November 2014

Dear Sir / Madam,

RE Consultation on World Bank Draft Environmental and Social Framework: 30 July 2014

Thank you for the opportunity to comment on this draft Framework.

I - CERFE

CERFE is a non-profit research and training organization in General Consultative Status with the Economic and Social Council of the United Nations. CERFE has worked in 68 countries around the world, mainly in Africa, Latin America, MENA Region and Europe, with many international organizations (including the WBG since 1994). Since the 80s CERFE is working on the effects of growth of social subjectivity in modern societies. CERFE’s interest is focused on social actors, as the main subjects of research and policies implementation, and topics such as the social subjectivity in Internet; migration processes as a “triple win” for development; governance issues (control of corruption, rule of law, government effectiveness; business enabling environment; etc.) and the social action functional to its improvement; the human factor as the engine of environmental transition. Since 1994 CERFE has cooperated many times with the WB on social and environmental risks analysis at the local level (at the overall level and in countries such as Argentina, Peru, Angola, Senegal, South Africa and Zimbabwe).

II - General comments

We have analysed the first draft Environmental and Social Framework, as well as the drafts on: Environmental and Social Assessment, the Environmental and Social Commitment Plan, Environmental and Social Risk Classification, and on the Use and Strengthening of Borrower’s Environmental and Social Framework.

Policies and measures included in these documents represent an important improvement in the consideration of societal issues among its safeguard policies. However, as we’ll specified in some specific comments below only some societal issues have been taken enough into account.

Moreover, it could be useful to extend the scope of the document beyond the projects the WB supports through Investment Project Financing to any project funded by the WBG.
Finally, the FPIC approach (Free, Prior and Informed Consent – see p.78 §18 and p.80, §20), *mutatis mutandi*, should be extended beyond the specific case of projects involving indigenous people to all the WB projects and be applied with all the societal communities involved in these projects.

III - Specific comments

**III-1 – WB Environmental and social framework – First draft for consultation – July, 30 2014**

p.1, §4: standard should concern, if possible, projects supported by the Bank through Investment Project Financing, but ANY project funded by the WBG

p.5, §4: scientific research should be mentioned (The World Bank uses its convening ability, financial instruments, and intellectual resources – *scientific research included* - to embed this commitment to environmental and social sustainability across all its activities)

p.8, §1: extend the purpose beyond the projects the WB supports through Investment Project Financing to any project funded by the WBG

p.9, §4 a): probably, it is already implied; but it could be useful to explicit among the environmental risks and impacts, the ones related to natural hazards such as flood, landslide, etc (that are also related to climate change but not only)

p.9, §4 b): among the social risks and impacts, should be added (among other):
- The lack of the access to education at adequate quality standards;
- The lack of the access to health and social services at adequate quality standards;
- The lack of the access to other essential services, such as water, sanitation, local transport, power, finance, registry, (ICT), etc.;
- The lack of social cohesion;
- High unemployment (also related to specific people segments such as youth)
- The lack of governance and control of corruption

p.10, §7: see p.9, §1; §8 should be extended consequently.

p.12, §20: criteria for classifying all projects should be better specified; alternatively analytical guidelines for classifying all projects to be drafted shortly should be scheduled, specifying a time frame for their approval and application (the informative note 1 - Environmental and Social Risk Classification – draft October 7, 2014 – solves in part this problem)

p.17, §44 (at the end): “…For High Risk or complex projects with potentially significant adverse environmental and social impacts, the Bank will have the OBLIGATION (and not just the right) to carry out independent consultation activities”.

p.17, §46: an explicit and adequate budget should be established permitting to the WB to “monitor the environmental and social performance of the project”

p.17, §52: it could be useful to add at the end “also in the frame of the specific budget of each supported project”
p.22, §6: see p.9, §1 (see also p.23, §13)

p.27, §26 a): probably, it is already implied; but it could be useful to explicit among the environmental risks and impacts, the ones related to natural hazards such as flood, landslide, etc (that are also related to climate change but not only)

p.27, §26 b): among the social risks and impacts, should be added (among other):
- The lack of the access to education at adequate quality standards;
- The lack of the access to health and social services at adequate quality standards;
- The lack of the access to other essential services, such as water, sanitation, local transport, power, finance, registry, (ICT), etc.;
- High unemployment (also related to specific people segments such as youth)
- The lack of social cohesion;
- The lack of governance and control of corruption

p.27, §27: it could be useful to add at the end “Alternatively, such measures could be suggested to the Borrower by the WB”

p.28, §31: better “For projects that are High Risk or contentious, or that involve serious multidimensional environmental or social risks or impacts, the Borrower WILL (and not just may) be required to engage one or more internationally recognized independent experts

p.29, §33: presently only global environmental risks and impacts are taken into account; global social risks and impacts should be also considered, such as the ones linked to international migration, terrorism, criminality, etc.

p.30, §40: it could be useful to add at the end that the feasibility of the ESCP should be carefully checked by the Borrower and the WBG

p.30, §42: the ESCP should be implemented under the supervision (and/or in agreement with the WBG)

p.47, §14: it could be better to write “Where the project involves provision of services to communities, the Borrower will ensure safety, ACCESSIBILITY and HIGH quality of such services”

p.49, §22: natural hazards such as flood or landslide should be also mentioned

p.49, §24, point (d): it could be better to write “diverse media channels AND OTHER APPROPRIATE COMMUNICATION TOOLS for COMMUNICATE WITH the affected community and other stakeholder”

p.61, §17: the plan, specifically for cases d), c) and b) should also design negotiation procedures with all the involved societal actors (interest/point of view of these actors can also diverge)

p.62, §22, 23 and 24; p.62, §25: negotiation procedures should also be mentioned

p.62, §29: the plan should also design negotiation procedures

p.84, §1: it could be useful to add that cultural heritage increases awareness and reinforcement of community and inhabitants of the areas concerned identity, as well as their self-esteeem; can contribute to the reduction in the “stigma” attached to particular areas and their inhabitants and to
the production of communication-flow between the more deprived and more privileged areas. In sum, cultural heritage valorisation has to be considered as an important tool for alleviating/eradicating poverty

p.84, § 4: definition of cultural heritage should be more detailed. We suggest add at the end of this § (in the main text or as foot-note): “the status of “cultural heritage” can also apply to a very varied set of tangible and intangible elements whose only common characteristic is their capacity to express a given culture, understood as a set of forms of representation, norms, modes of behaviour, forms of organisation and so on”

p.92, §1: at the beginning the WBG (and other financial partners) should be mentioned

p.93, §4: extend the scope of application beyond the projects the WB supports through Investment Project Financing to any project funded by the WBG

p.93, §7: we suggest to add “two-ways communication” (related to consultation); “interpretative negotiation” (related to stakeholder engagement planning and on-going reporting) and “operational negotiation” (related to participation; more specifically, the implementation of all the project actions that represent a concern from stakeholders or some of them)

p.93, §8: criteria at this regard should be better specified; alternatively analytical guidelines to be drafted shortly should be scheduled, specifying a time frame for their approval and application

p.93, §10: borrower should not limit himself in the provision of information on the issues mentioned below (in this §); on these same issues, a two-ways communication process should be promoted

p.95, §16: negotiation processes/procedures (and, as far as possible, their rules) should be also considered in the Stakeholder Engagement Plan


p.2, §5, c): natural hazards, such as flood and landslide are to be taken also into account in the frame of a Hazard or risk assessment?

p.2, §5, d): (potential) positive effects of a project (e.g. alleviation of conflicts) should be also taken into account

p.2, §5, e): the measures to be taken during the implementation and operation of a project to strengthen favorable environmental and social impacts should be also taken into account in an ESMP

p.2, §5, f): same in the ESMF

p.8, §8: it could be useful to add that the WB will support this process with adequate human and financial resources (if requested) as better as possible

p.7, §17 (E) (a): probably, it is already implied; but it could be useful to explicit among the environmental risks and impacts, the ones related to natural hazards such as flood, landslide, etc (that are also related to climate change but not only)
p.8, §17 (E) (b): among the social risks and impacts, should be added (among other):
- The lack of the access to education at adequate quality standards;
- The lack of the access to health and social services at adequate quality standards;
- The lack of the access to other essential services, such as water, sanitation, local transport, power, finance, registry, (ICT), etc.;
- High unemployment (also related to specific people segments such as youth)
- The lack of social cohesion;
- The lack of governance and control of corruption

III-3 – ESSI – ANNEX 2. ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

– Draft for consultation – October, 7 2014

p.1, §3: the measures to be taken during the implementation and operation of a project to strengthen favorable environmental and social impacts should be also taken into account in an ESCP

III-4 – Information Note 1 - Environmental and Social Risk Classification– Draft for consultation – October, 7 2014

This informative note, if completed with some concrete example (classification H, S, M, L of some real projects), could represent the expected guidelines suggested above (comment III-1 p.12, §20)

Please let us know and keep us updated.

Congratulations for your excellent work and best regards,

Gabriele Quinti
CERFE (Centro di Ricerca e Documentazione Febbraio ’74)