

29 April 2013

The World Bank  
Safeguard Policies Review Team  
Review and Update – Phase I Consultation

In response to the World Bank's call for input on the review of its safeguard policies, the Pacific Invasives Partnership (PIP) is submitting the following comments for consideration. PIP is the regional coordinating body that assists Pacific Island Countries and Territories in achieving more effective management of invasive alien species. PIP includes representatives from the governmental, nongovernmental, intergovernmental and academic sectors and applies this broad range of interests and expertise toward building local capacity and helping to tackle Pacific invasive alien species problems (see list of PIP members below).

PIP strongly recommends including provisions related to invasive alien species in the current range of World Bank safeguard policies, particularly those on environmental assessment, natural habitats, pest management and forests. The adverse impacts of invasive alien species on food security, water availability, biodiversity, ecosystem services, human health and more broadly livelihoods have been widely documented, and will be exacerbated by climate change. Addressing this full range of impacts requires action ranging from biosecurity policies that can prevent new invasions to the application of new methods and technologies for eradicating and managing existing invasions.

We increasingly have the knowledge and tools for the effective management of invasive alien species and the risks they present. Broader mainstreaming of these principles will support the continued provision of ecosystem services, which are under pressure from other stressors such as climate change and are particularly important for the livelihoods of marginal and at risk communities.

In its operations the World Bank should avoid exacerbating the problem of invasive alien species by ensuring that its lending and project activities fully assess the potential risks involved in the introduction, spread or population increase of invasive alien species. Safeguard policies should therefore recognize the following four priorities:

- 1) Intentional introductions: non-native species intended for introduction through World Bank activities (e.g. aquaculture, biofuels) shall undergo a risk assessment to assess their potential for invasiveness and associated economic, environmental, social and cultural impacts prior to their introduction. Those presenting a significant risk shall not be used or suitable risk management measures shall be required. Where possible native species shall be considered.
- 2) Unintentional introductions: World Bank activities that may result in the unintentional introduction of invasive alien species (e.g. transport, energy development, infrastructure) shall assess the risks of introducing non-native species through these activities and implement appropriate risk management measures.
- 3) Invasive alien species management: World Bank activities that are directed at the eradication or control of invasive alien species shall include feasibility assessments that incorporate environmental impact assessments, and detailed project implementation and monitoring plans.

Use of regulated technologies, such as toxicants, shall be considered and evaluated as part of feasibility assessments.

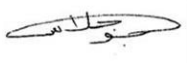
- 4) Existing invasive alien species: World Bank activities (e.g. road construction, hydroelectric dams) that exacerbate existing invasive alien species problems shall assess this risk and make provisions to manage the risk.

Inclusion of these principles is therefore critical for ensuring that World Bank activities themselves do not undermine its mission to reduce poverty and ensure sustainable development by the deliberate or inadvertent introduction of invasive alien species. Setting a strong standard on invasive alien species will also help align World Bank in its involvement with the Critical Ecosystems Partnership Fund (which is supporting invasive alien species management activities) as well as the Global Environment Fund. Finally, development of this language will help align the World Bank with similar policies of other multilateral development banks including the International Finance Corporation and the Inter-American Development Bank.

Proper implementation of these principles would require elaboration in a more detailed technical guidance document, particularly in relation to existing safeguard policies around environmental assessments, biodiversity and natural habitats and invasive alien species management. The pest management policy, in particular, should be extended to include management for native biodiversity protection and enhancement as well as food security, water availability, ecosystem services, human health and more broadly livelihoods. As mentioned above, PIP members include a wide range of expertise and would be interested and willing to provide further input and expertise at the appropriate stage.

Again PIP welcomes the World Bank's review of its safeguard policies and the opportunity this provides for ensuring that the World Bank and PIP are working towards mutually supportive ends. Please feel free to contact us with any questions or comments.

Sincerely,



Dr. Souad Boudjelas

On behalf of the Pacific Invasives Partnership

**PIP members:**

Austral Foundation	MAF Biosecurity New Zealand	United Nations Environment Programme
BirdLife Pacific	Micronesia Regional Invasive Species Council	US APHIS Pacific Safeguarding Initiative
CABI	New Zealand (MFAT) Aid Programme	US Department of State
Conservation International	New Zealand Department of Conservation	US Forest Service
Global Islands Partnership	Pacific Invasives Initiative	US National Biological Information Infrastructure — Pacific Basin Information Node
Hawaii Invasive Species Council	Pacific Invasives Learning Network	US National Invasive Species Council
Invasive Species Specialist Group	Pacific Islands Forum Secretariat	University of the South Pacific
Island Conservation	Secretariat of the Pacific Community	University of Hawaii, Pacific Cooperative Studies Unit
IUCN Oceania	Secretariat of the Pacific Regional Environment Programme	University of Melbourne, Department of Resource Management and Geography
Landcare Research, New Zealand	The Nature Conservancy	

Cc: Valerie Hickey, World Bank.