**Comments on the Approach Paper of World Bank’s Safeguard Policies Review**

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**1. New Policies should be applied to all types of Bank activities.**

* Lists of different types of lending processes should be made: Investment Lending (IL) including financial intermediaries (FIs) and Country System (CS), Development Policy Lending (DPL), Program-for-Results (PforR), Trust Funds, Grants, Guarantees, Technical Assistance, etc.
* ADB’s Approach (Policy Principles, Delivery Process, Safeguard Requirements) can be used as reference.
* JICA’s Social and Environmental Guidelines can serve as standards for Technical Assistance.

**2. OP/BP 4.00 and 9.00 should be integrated into the new Framework.**

* Table 1 of OP 4.00 (Using of Country System) can be a model of requirements for borrower’s environmental and social management systems (ESMS). ESMS analysis should also be disclosed in FI, DPL and PforR before Board consideration.
* Safeguard requirements in OP/BP 9.00 (PforR) should be also revised, since there is no gap-filling requirement. OP/BP 9.00 should be included in the scope of review.

**3. The World Bank should adopt the International Best Practices:**

* Disclosure of Social and Environmental Monitoring Reports (ADB);
* Disclosure of draft EIA reports at least 120 days before Board consideration in Category A projects (ADB);
* Establishment of Grievance Redress Mechanisms (IFC, ADB);
* Free, Prior, and Informed Consent (FPIC) with Indigenous Peoples (IFC);
* Labor standards (IFC): and
* Review of primary supply chain (IFC).

**4. The new Safeguard Policies should not be diluted.**

* Welcome the President’s statement “no intention of diluting” at the CSO Townhall in Tokyo.
* What is no dilution of safeguard?
* All requirements including steps and timings in the current Policies should be sustained.
* To clarify the scope and application, vague wordings such as “as appropriate” and “relevant” should not be used.
* Definition of key words/categorization should not be changed inappropriately.
* “No go zone (e.g. critical natural habitat)” should be sustained.
* At the 1st draft release, detailed comparison analysis with current requirements should be made available.

**Proposal on Bank’s new Safeguard Framework**

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| **3 Modalities**   * Requirements for ESMS (e.g. CS, FI, PforR, DPL, etc.) * Requirements for Projects (including sub projects of FI and Programs, etc.) * Bank’s Procedures (including Categorization, Due Diligence, TA activities, etc.) | **8 Policies**   * Environmental & Social Assessment * Labor * Efficiency & Pollution * Health & Safety (inc. Dam Safety) * Resettlement * Natural Habitats (inc. Forest) * Indigenous Peoples * Cultural Heritage |