

# 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 1<sup>st</sup> draft release, detailed comparison analysis with current requirements should be made available.

# Proposal on Bank's new Safeguard Framework

## 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