

**World Bank’s Safeguard Policies, Review and Update**

**Stage 2**

**Summary of Feedback**

**Date:** February 2, 2015

**Location (City, Country):** Cusco, Peru

**Audience (Government, Civil Society, etc.):** Government

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| **Specific participant comments**  |
| 1. **General Comments**
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| *Comments and Recommendations* * There is concern about the **availability of the necessary resources to implement the new Environmental and Social Framework**, in the World Bank as well as in the borrowing countries.
* The World Bank should **emphasize policy enforcement** as issues are not in regulations’ design or language but rather in their enforcement.
* Bank financed projects should help build **governments’ institutional capacities**, including environmental education.
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| 1. ***A Vision for Sustainable Development***
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| *N/A* |
| 1. ***World Bank Environmental and Social Policy***
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| *N/A* |
| 1. ***Environmental and Social Standard (ESS1): Evaluation and management of environmental and social risks and impacts***
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| *Comments and Recommendations** World Bank funded projects should take into consideration **non physical disabilities, such as sensory or psycho social disability, among others.**
* The Bank should promote **universal access to education for people with disabilities**.
* It is important to **promote the use of appropriate terms to designate people with disabilities**. Offensive words such as the disabled, handicapped, etc. must not be used
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| 1. ***Environmental and Social Standard 2 (ESS2): Labor and working conditions***
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| *N/A* |
| 1. ***Environmental and Social Standard 3 (ESS 3): Effectiveness in resources and pollution prevention***
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| *Comments and Recommendations** **Environmental auditing** should be included as a mechanism to prevent environmental pollution.
* Water based projects should take account of potential **upstream impacts**.
* Regulations should consider the impacts of Bank investments on climate change, especially regarding **greenhouse gas emissions. Norms concerning climate change should cut across all Bank’s environmental guidelines.**
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| 1. ***Environmental and Social Standard 4 (ESS 4): Community and Health Security***
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| *Comments and Recommendations** The **use and sale of agrochemicals should be carefully regulated**, especially highly toxic pesticides that can have negative impacts on people’s health.
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| 1. ***Environmental and Social Standard 5 (ESS 5): Land purchases, restriction to land use and involuntary resettlement***
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| *N/A* |
| 1. ***Environmental and Social Standard 6 (ESS 6): Biodiversity conservation and sustainable management of live natural resources***
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| *Comments and Recommendations** ESS 6 should **forbid the use of genetically modified organisms** in World Bank financed projects because of their impact on biodiversity.
* Environmental assessments should consider post-project environmental effects, in particular the effect of **irrigation infrastructure on water resources** typically poorly managed in Peru.
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| 1. ***Environmental and Social Standard 7 (ESS 7): Indigenous peoples***
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| *Comments and Recommendations** Some rural communities call themselves indigenous but government does not consider them as such. Care should be put to take into account the **communities’ self-identification**, especially when government does not consider them indigenous.
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| 1. ***Environmental and Social Standard 8 (ESS 8): Cultural Heritage***
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| *Comments and Recommendations** The Framework should take both **cultural and natural heritage into account.** In Peru, they go together.
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| 1. ***Environmental and Social Standard 9 (ESS 9): Financial intermediaries***
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| *N/A* |
| 1. ***Environmental and Social Standard 10 (ESS 10): Dissemination of information and participation of stakeholders***
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| *Comments and Recommendations** **Civil society must be involved in monitoring of projects during implementation**. In Peru, there have been instances in which environmental management plan requirements have not been met.

*Questions** How would ESS 10 apply when communities in a project’s **direct impact zones agree to a project opposed by people living in indirect impact zones**? Some projects in Peru were frustrated because of the local communities’ opposition. This created social and environmental impacts. How can the Framework help address these issues?
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