

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

Specific participant comments

1. General Comments

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.

2. A Vision for Sustainable Development

N/A

3. World Bank Environmental and Social Policy

N/A

4. Environmental and Social Standard (ESS1): Evaluation and management of environmental and social risks and impacts

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

5. Environmental and Social Standard 2 (ESS2): Labor and working conditions

N/A

6. Environmental and Social Standard 3 (ESS 3): Effectiveness in resources and pollution prevention

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.

7. Environmental and Social Standard 4 (ESS 4): Community and Health Security

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.

8. Environmental and Social Standard 5 (ESS 5): Land purchases, restriction to land use and involuntary resettlement
N/A
9. Environmental and Social Standard 6 (ESS 6): Biodiversity conservation and sustainable management of live natural resources
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.
10. Environmental and Social Standard 7 (ESS 7): Indigenous peoples
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.
11. Environmental and Social Standard 8 (ESS 8): Cultural Heritage
Comments and Recommendations
The Framework should take both cultural and natural heritage into account. In Peru, they go together.
12. Environmental and Social Standard 9 (ESS 9): Financial intermediaries
N/A

13. Environmental and Social Standard 10 (ESS 10): Dissemination of information and participation of stakeholders

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?