



**Review and Update of the World Bank's Environmental and Social Safeguard Policies
Phase 2
Feedback Summary**

Date: November 24, 2014

Location (City, Country): Dhaka, Bangladesh

Audience (Government, CSO, etc.): Government and implementing agencies

Overview and Key Issues Discussed: Key issues discussed include: donor harmonization; gaps between the Bank policy and the national system; capacity building and implementation support; water security; non-discrimination; risk classification; labor issues; land acquisition; and financial intermediaries. **This summary is subject to change after review and comments from consultation participants.**

Specific Feedback from Stakeholders
1. General Comments
<p><i>Comments and recommendations</i></p> <ul style="list-style-type: none"> • Each donor, such as World Bank, JICA and ADB, has different safeguard policies and guidelines. Some flexibility should be introduced so that one single policy can be applied to each country. This would help us implement the policy. • The Bank should help the government establish the right of poor people in Dhaka, while the situation in the city is worsening day by day. • The Bank should assist the government in promoting gender equality. • Political leaders should understand environmental and social safeguard policies. Otherwise the lack of their understanding on safeguard issues will cause project delays. • The Framework should address the issues of green development, governance and water security. • While the Framework only addresses dam safety, the Bank should also address the broader water security issues both on quality and quantity, and transboundary impact. • Oil and Gas Sector and the Electrical Projects have certain specific impacts on Health, Safety and Environment (HSE) and OHS. Hence additional or supplementary provisions should be given in the Framework for these sectors.

<ul style="list-style-type: none"> • A country-specific program should be introduced for environmental and social enhancement to benefit society as a whole. • Implementation guidelines should be provided. • Provisions for specified formats to be followed in monitoring and reporting of EMP and other documents should be given in the guideline.
2. A Vision for Sustainable Development
N/A
3. World Bank Environmental and Social Policy
<i>Comments and recommendations</i> <ul style="list-style-type: none"> • While the World Bank proposes a non-discrimination principle, this principle applies only to World Bank-financed projects. This is discrimination. The principle should be applied to all projects. • The definition of each risk should be clearly provided in the Framework.
4. Environmental and Social Standard 1 (ESS1): Assessment and Management of Environmental and Social Risks and Impacts
<ul style="list-style-type: none"> • Occupational Health and safety (OHS) issues should be addressed in the assessment of risks and impacts. • In Para 17 on EHSG, further clarification should be given on the term “stringent”. • Para 26 on mitigation hierarchy provides for “reduction of impact to acceptable levels”. This “acceptable levels” should be more specified.
5. Environmental and Social Standard 2 (ESS2): Labor and Working Conditions
<i>Comments and recommendations</i> <ul style="list-style-type: none"> • The definition of “project worker” and “government civil servant” should be further clarified. There are a number of different types of civil servant who are working on Bank projects.
6. Environmental and Social Standard 3 (ESS3): Resource Efficiency and Pollution Prevention
N/A
7. Environmental and Social Standard 4 (ESS4): Community Health and Safety
N/A
8. Environmental and Social Standard 5 (ESS5): Land Acquisition, Restriction on Land Use and Involuntary Resettlement
<i>Comments and recommendations</i>

<ul style="list-style-type: none"> • In the social safeguards such as land acquisition and encroacher, there is a huge gap between the Bank and the national system. The Bank policy should be in line with the national system. • The Bank's requirement to provide assistance to encroachers encourages them to grab government lands. This is unfair and should be revisited. • The Bank should clarify how to address the impact of road projects on temporary business vendors working roadside.
9. Environmental and Social Standard 6 (ESS6): Biodiversity Conservation and Sustainable Management of Living Natural Resources
N/A
10. Environmental and Social Standard 7 (ESS7): Indigenous Peoples
<i>Clarifications</i> <ul style="list-style-type: none"> • Clarification was sought on whether the Bank allows alternative terminology for Indigenous Peoples, such as tribal people.
11. Environmental and Social Standard 8 (ESS8): Cultural Heritage
N/A
12. Environmental and Social Standard 9 (ESS9): Financial Intermediaries
<i>Comments and recommendations</i> <ul style="list-style-type: none"> • In Bangladesh, the largest number of FI projects is retrofitting. ESS9 should be reviewed to facilitate such projects. • While the Framework only applies to high risk FI subprojects, the Bank should note that the national law is insufficient to address non-high risk subprojects.
13. Environmental and Social Standard 10 (ESS10): Information Disclosure and Stakeholder Engagement
N/A