



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

Date: January 14, 2015

Location (City, Country): Bridgetown, Barbados

Audience (Government, CSO, etc.): Government

Specific Feedback from Stakeholders

1. General Comments

Comments and Recommendations

- **Further harmonize environmental and social policies across different multilateral lending institutions** in line with the Paris Declaration on Aid Effectiveness. It was recommended that particular attention is put to the specificities of small states as small states do not have sufficient resources or capacity to simultaneously meet different requirements of various lending institutions.
- The Bank should move away from a global treatment of environmental and social issues and towards **a regional approach**. In this sense, it should promote **regional assessments of institutional capacity** for environmental and social management.
- Other participants noted that the Environmental and Social Framework should not strive to change national culture and systems, but should only be concerned with **project-level environmental and social impacts**, leaving the broader environmental and social strategies to the Governments.

- **The use of country systems should be expanded.** There should be an assessment of country systems in order to identify gaps that could be filled with the application of environmental and social policies. This particularly should recognize the progress of national environmental policies across the globe.
- More specifically promote the **strengthening of country systems** through the environmental and social standards.
- Environmental and social policies that apply to World Bank financed projects should be agreed upon with the Governments **based on the development agenda of each borrower.** In this context, Environmental and Social policies should not be prescriptive and should not equate to a form of 'collateral' for World Bank loans.
- Projects should be developed with reference to **national development policies.**
- Environmental and Social policies should be framed at the national level and **tied to Country Partnership Strategies.** For example, they could follow the model of economic transparency guidelines, which are agreed upon with the borrowers on a semi-annual basis.
- **Increasingly onerous World Bank lending requirements are making access to resources more difficult for small states.** The new Framework should promote easier access to World Bank resources for small borrowers.
- Environmental protection is more effective when it is carried out within a **broader strategy** and not on a project by project basis.
- There is concern that the new policies might not be applied **consistently** at the project level.
- The **Government, rather than the World Bank, should monitor the environmental and social aspects of projects** to ensure they also fulfill the requirements of national legislation.
- The Framework's requirements are **too onerous for borrowers.** The amount of requirements should be commensurate with project risk.

- The World Bank should consider the fact that given the small size of the Caribbean Island States, **spillover effects of social and environmental project impacts tend to be more significant** than in other places. Impacts from relatively low risk projects may be more significant in the Caribbean than in other places.
- With the exception of adaptation to Climate Change, the **Caribbean states tend to have effective environmental systems in place**, which are successful in minimizing risks from projects. The Framework does not add much value.
- The Framework should more **explicitly state the role of the Bank and the Borrower** in supervising compliance with the standards.

Questions

- Participants sought clarification on the **timeline** for the approval of the new Framework, and particularly about the timing for phase 3 of the consultation process.

2. A Vision for Sustainable Development

N/A

3. World Bank Environmental and Social Policy

N/A

4. Environmental and Social Standard 1 (ESS1): Assessment and Management of Environmental and Social Risks and Impacts

Comments and Recommendations

- How will the Bank work in **data-poor environments**, where the State lacks capacity to gather important information for environmental impact assessments? There is concern that in these cases the Bank may be pressured to continue with project preparation without sufficient information to accurately assess environmental and social impacts.
- The World Bank should provide **capacity building for governments** to improve their regulatory and institutional framework to address the social impacts of development projects.

- The World Bank should provide training to Government agencies on how to **incorporate social issues** in World Bank financed projects.

5. Environmental and Social Standard 2 (ESS2): Labor and Working Conditions

N/A

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

Comments and recommendations

- There is concern that **resettlement compensation** for people without legal land claims **promotes illegal activities**. Due to the small size of the Caribbean states and economies, **the impacts of this are greater than in other places**.
- The World Bank involuntary resettlement standards, especially in regard to timing requirements for relocation and compensation, **stretch the capacity of the states, ultimately dicentivizing investments that may cause resettlement** but that might be very needed in a country's development.
- Participants expressed concern over the **cost implications** of Paragraph 30 (b) of ESS5, which provides for replacement property at equal or greater value or cash compensation at replacement cost in cases affecting persons "with legal rights to land that are recognized or recognizable under national law." Where national law defines broadly what may be "recognizable" claims to land, people may use these provisions to get replacement property at equal or greater value.

9. Environmental and Social Standard 6 (ESS6): Biodiversity Conservation and Sustainable Management of Living Natural Resources

<p><i>Comments and Recommendations</i></p> <ul style="list-style-type: none"> • The protection of wetlands should be explicitly mentioned in the Framework. • The protection of marine ecosystems should be explicitly mentioned in the Framework.
<p>10. Environmental and Social Standard 7 (ESS7): Indigenous Peoples</p>
<p>N/A</p>
<p>11. Environmental and Social Standard 8 (ESS8): Cultural Heritage</p>
<p>N/A</p>
<p>12. Environmental and Social Standard 9 (ESS9): Financial Intermediaries</p>
<p>N/A</p>
<p>13. Environmental and Social Standard 10 (ESS10): Information Disclosure and Stakeholder Engagement</p>
<p><i>Questions</i></p> <ul style="list-style-type: none"> • The participants asked about the specific procedures that people affected by World Bank financed projects can follow to present their complaints, and more generally, about the grievance redress processes in place in World Bank projects, as well as about any changes to the Bank’s grievance redress requirements contained in ESS10.