



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

**Date:** December 11, 2014

**Location:** Tokyo, Japan

**Audience:** CSO, academia and private sector

**Overview and Key Issues Discussed:** Key issues discussed include environmental assessment; risk classification; disability and accessibility; labor issues; involuntary resettlement; alternative approach in ESS7; information disclosure; and gender equality.

<b>Specific Feedback from Stakeholders</b>
<b>1. General Comments</b>
<p><i>Comments and recommendations</i></p> <ul style="list-style-type: none"> <li>• The Bank should disclose the <b>second draft Framework</b> and the <b>Procedures</b> for public comment.</li> <li>• For efficiency, the Bank should harmonize the Framework with <b>IFC PS</b> and the <b>Guidance Notes</b>.</li> <li>• <b>Disability</b> organizations and experts should be involved in training and project review committees. The Framework should extend its coverage for disability and minority issues. The Bank should give more attention to <b>accessibility</b>.</li> <li>• <b>Gender</b> requirements should be strengthened. Gender equivalent outcomes should be achieved.</li> </ul>
<b>2. A Vision for Sustainable Development</b>
N/A
<b>3. World Bank Environmental and Social Policy</b>
<p><i>Clarifications</i></p> <ul style="list-style-type: none"> <li>• Clarification was sought on the definition of and requirements for each <b>risk classification</b>.</li> </ul> <p><i>Comments and recommendations</i></p> <ul style="list-style-type: none"> <li>• ESP, para 5, states that projects supported by the Bank “<b>are expected to meet</b>” the ESSs. This is unclear and should be revised to make it clear that it is a requirement to meet the ESSs.</li> </ul>
<b>4. Environmental and Social Standard 1 (ESS1): Assessment and Management of Environmental and Social Risks and Impacts</b>
<p><i>Clarifications</i></p> <ul style="list-style-type: none"> <li>• Clarification was sought on how the Framework will address <b>cumulative impacts</b>.</li> <li>• Clarification was sought on the difference between <b>risks and impacts</b>.</li> </ul> <p><i>Comments and recommendations</i></p> <ul style="list-style-type: none"> <li>• The Framework should place more focus on <b>SESA</b>.</li> <li>• Unless clearly instructed, the entity undertaking the environmental assessment does not consider alternatives. In reality, the assessment is often done as an excuse to justify the project. The Framework should give clear instructions on what must be considered in the assessment.</li> </ul>
<b>5. Environmental and Social Standard 2 (ESS2): Labor and Working Conditions</b>
<p><i>Comments and recommendations</i></p>

<ul style="list-style-type: none"> <li>There is a gap between the proposed ESS2 and labor standards in IFC PS2, and the standards of EBRD and AFDB. The <b>freedom of association</b> and the <b>right to collective bargaining</b> need to be strengthened. The <b>protection of contract workers</b> and <b>supply chain workers</b> should be clarified. With the current scope of application, almost no one will be covered by ESS2.</li> </ul>
<b>6. Environmental and Social Standard 3 (ESS3): Resource Efficiency and Pollution Prevention</b>
N/A
<b>7. Environmental and Social Standard 4 (ESS4): Community Health and Safety</b>
N/A
<b>8. Environmental and Social Standard 5 (ESS5): Land Acquisition, Restriction on Land Use and Involuntary Resettlement</b>
<p><i>Comments and recommendations</i></p> <ul style="list-style-type: none"> <li>It is a concern that ESS5 does not <b>cover land titling/regularization</b> activities. These activities should be addressed in the Framework.</li> <li>It is unclear how resettlement will be properly conducted and monitored after Board approval.</li> <li>The Bank should incorporate the <b>Voluntary Guidelines (VG)</b> into ESS5.</li> </ul>
<b>9. Environmental and Social Standard 6 (ESS6): Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>
<p><i>Comments and recommendations</i></p> <ul style="list-style-type: none"> <li>While the Bank claims ESS6 strengthens biodiversity conservation, the wording in ESS6 is <b>unclear and confusing</b>, in particular on <b>critical habitat</b>. It appears to be stepping down from the current policy. This should be improved.</li> <li>The proposed ESS6 does not appear to be in line with the Business and Biodiversity Offsets Program (<b>BBOP</b>).</li> </ul>
<b>10. Environmental and Social Standard 7 (ESS7): Indigenous Peoples</b>
<p><i>Clarifications</i></p> <ul style="list-style-type: none"> <li>Clarification was sought on whether the term “<b>voluntary isolation</b>” includes physical as well as spiritual isolation.</li> </ul> <p><i>Comments and recommendations</i></p> <ul style="list-style-type: none"> <li>The proposed ESS7 should refer to <b>UNDRIP</b>.</li> <li>There is a concern that the introduction of the “<b>alternative approach</b>” will open the flood gates and can be misused.</li> <li>The Bank should not finance projects where there are concerns of ethnic tension, rather than considering an “alternative approach.”</li> </ul>
<b>11. Environmental and Social Standard 8 (ESS8): Cultural Heritage</b>
N/A
<b>12. Environmental and Social Standard 9 (ESS9): Financial Intermediaries</b>
N/A
<b>13. Environmental and Social Standard 10 (ESS10): Information Disclosure and Stakeholder Engagement</b>
<p><i>Comments and recommendations</i></p> <ul style="list-style-type: none"> <li>In ESS10, it should be clarified which document needs to be disclosed at which time, such as <b>EIA, IEE, RAP and IPP</b>.</li> </ul>