



**Review and Update of the World Bank’s Environmental and Social Safeguard Policies  
Draft ESF - II Phase Consultations  
Feedback Summary**

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**Date:** March 5, 2015  
**Location:** Yaoundé, Cameroon  
**Audience:** CSOs, NGOs, Private Sector and Academia  
**No. of Participants:** 81

**Overview:** Bank representatives welcomed Cameroonian participants consisting of Non-Governmental Organizations, Civil Society Organizations, private sector and academia. Participants introduced themselves and Bank representatives provided an overview of the process to date followed by a presentation of the “*Draft Environment and Social Framework: Setting Standards for Sustainable Development*”. The floor was opened for discussion and participants provided detailed comments on the draft framework, posed specific questions on the various ESSs and looked for clarifications in terms of the drafting process and board approval.

A summary of such discussion can be found below.

Specific Feedback from Stakeholders
<b>1. General Comments</b>
<ul style="list-style-type: none"> <li>• One participant expressed that invitations should have been sent out earlier with documents to be discussed included. Another participant then thanked the WB for having send out invitations and including information to be discussed.</li> <li>• Need to better address some HRs provisions to avoid future conflict or confusion (i.e., sexual orientation)</li> <li>• Is the WB going to adopt international standards, conventions and declarations for each of these new ESSs? Why reference to some and not others?</li> </ul>

- Is there a blending approach between IFC, GEF and IBRD standards for funding?
- How will corruption be handled? Shouldn't there be stronger provisions on the issue of corruption in the draft framework?
- Need for clarity of definitions and consistent terminology surrounding affected communities, vulnerable groups, marginalized groups, minorities and IPs.
- How do you handle situations of fragility and conflict? What are the governance and accountability principles to address such matters in the draft ESF?
- How will weak or soft governance be handled?
- How do you intend to align government policies and WB policies in a progressive manner? And how to ensure that there is an alignment?
- In regards to non-discrimination, a participant proposed that the draft ESF should give to a number of countries the option to adhere or not to a number of principles, providing the option to opt out of the application of certain principles (such as the application of the principle of non-discrimination on the basis of sexual orientation).
- A suggestion was made on having subprojects administered in the same manner as the original or main project.
- How will this draft ESF be operationalized? There is a difference between what is written and what happens in the field.
- Need for clarity on procedures and guidelines. Will CSOs and NGOs also be consulted on that?
- These policies are more important and useful during the preparation phase of projects; once the project has been prepared and obtained funding, the safeguards policies are usually not implemented.

## **2. A Vision for Sustainable Development**

- How to handle issues of non-discrimination, when a country does not recognize homosexuality as legal?
- The comment was made that the respect for HR should be a fundamental criterion for funding decisions

## **3. World Bank Environmental and Social Policy**

- There were no discussions on this item.

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

- Need for clarification: What should come first the environmental and social standards of the WB or the national laws in a country where there could be gaps or differences?
- What exactly are the newly proposed risk categories?
- Need for clarification of terminology: The term risk seems ambiguous Page 26, definition includes only climate change, in page 27 is different.

<ul style="list-style-type: none"> <li>• Also, natural hazards should be included as part of the risk categorization. Does the implementation of projects in a certain region not take into account this natural hazards? The problem appears in the French translation, not the English one.</li> <li>• The suggestion was made that an impact assessment be required at the end of the project.</li> </ul>
<b>5. Environmental and Social Standard 2 (ESS2): Labor and Working Conditions</b>
<ul style="list-style-type: none"> <li>• Need to take into consideration the local content. It should be clear that the borrower makes proposals on local content, using local contractors and allowing local communities to also work in projects.</li> <li>• Need to promote decent wages throughout local contractors.</li> <li>• Need to have labor information translated into local languages for affected communities to know their rights.</li> <li>• When addressing child labor, what is a farmer to do if he needs his children to assist him in the family farm? This has been a long standing practice throughout our farmers, would that now be considered forced child labor?</li> <li>• If there are provisions for workers, shouldn't there also be protection provisions for those not working, yet being affected by projects? Shouldn't we also be concerned with improving the livelihoods of those communities affected by projects?</li> <li>• In terms of project implementation, who will be in charge of protecting communities? Who will ensure that people will have equal opportunities in hiring? How will that be granted during implementation and will that be made public?</li> <li>•</li> </ul>
<b>6. Environmental and Social Standard 3 (ESS3): Resource Efficiency and Pollution Prevention</b>
<ul style="list-style-type: none"> <li>• What practices will be put in place to address the issue of garbage and waste management beyond the area of influence of a project? There are many projects surrounded by waste, yet nothing is done to address so. How will this be handled?</li> </ul>
<b>7. Environmental and Social Standard 4 (ESS4): Community Health and Safety</b>
<ul style="list-style-type: none"> <li>• There were no discussions on this item.</li> </ul>
<b>8. Environmental and Social Standard 5 (ESS5): Land Acquisition, Restriction on Land Use and Involuntary Resettlement</b>
<ul style="list-style-type: none"> <li>• How will the WB address land acquisition and restrictions on illegal settlements?</li> <li>• Are there numbers on affected communities resettled in Cameroon or the AFR region?</li> <li>• How will compensation be addressed to ensure improvement of livelihoods of affected communities?</li> <li>• What happens when compensation schemes between the WB and governments are different?</li> <li>• What will the WB do when a project has pending compensation issues yet a project is about to close?</li> </ul>
<b>9. Environmental and Social Standard 6 (ESS6): Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>

- There were no discussions on this item.

**10. Environmental and Social Standard 7 (ESS7): Indigenous Peoples**

- There is a problem with compliance of the policy. For example, what happens after the Indigenous Peoples Plan (IPP)? While implementing the project there is no requirement to make sure that those elements agreed in the IPP are complied with. There is an impression that so far the safeguards policies are used in the preparation phase rather than in implementation. The suggestion was made to require a post-project audit for Indigenous Peoples (IPs).
- The WB now introduces an Environmental and Social Commitment Plan (ESCP). But in addition to that, there should be another mechanism to assess due diligence. Like a certificate for the compliance of implementation of the measures specified in the IPP.
- A request was made to use the terminology “populations autochtones” in French.
- What are the specific criteria for the assessment of Free, Prior and Informed Consent (FPIC)? And would there be means to track whether that criteria is met or not? And in case this is not met, what would happen? Will this information be available publicly?
- On FPIC, how is the WB going to handle disagreements within the communities? When there is such disagreement the report needs to document dissenting voices as well.
- The WB should not give the possibility to governments to not trigger the policy, even when they have IPs. This would be a setback. Discussions should take place with these governments, but there should be no alternative approach. Otherwise some governments will take advantage of it and not comply with or apply the Standard.
- Regarding documents, what exactly are the various documents that the Borrower will have to prepare?
- It seems that there would be more documents? Seems to be more work. Shouldn't the WB be simplifying conditions?
- How can we have a document that proves that the government has actually complied with the social and environmental commitments he has agreed to during preparation of the project?
- The suggestion was made that FPIC should also apply to local communities
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**11. Environmental and Social Standard 8 (ESS8): Cultural Heritage**

- How will the WB handle intangible culture?
- Need to reconsider commercialization of cultural heritage. How can you promote the selling of cultural heritage?

**12. Environmental and Social Standard 9 (ESS9): Financial Intermediaries**

- How will different financial approaches be handled in a project? And when such circumstances occur, which one will prevail? Need for clarification on this.

**13. Environmental and Social Standard 10 (ESS10): Information Disclosure and Stakeholder Engagement**

- The draft ESF has specific responsibilities for the WB and borrower governments, but what is the specific role of NGOs and CSOs?
- Suggestion: need to include NGOs and CSOs in the M&E aspects, but also allow for affected communities to play a due diligence role which will empower them.
- Need for environmental audits and compliance mechanisms beyond implementation of the projects.
- How can CSOs and NGOs be assured that comments will be included in the draft ESF and that governments will pay attention to the recommendations made by CSOs and NGOs?
- How will you address issues of capacity building, when governments already have problems at times with implementing its own laws, yet the WB is choosing them for lending? Are there any lending practices for solely CSOs and NGOs or for direct engagement with local communities?
- A participant suggested having surveys and detailed studies with indicators to track project progress, implementation and compliance after closing.
- Need for further clarification on the meaning of “meaningful consultation”, when it would occur in the project cycle and why is it only mentioned on ESS10?

Bank representatives thanked participants for their valuable insights and encouraged them to submit further comments via: <https://consultations.worldbank.org/forums/forum-review-and-update-world-bank-safeguard-policies> or [safeguardconsult@worldbank.org](mailto:safeguardconsult@worldbank.org)

Additional information including links to the draft standards, annexes, fact sheets and Q&A can be found at the World Bank Safeguards Consultations site: <http://consultations.worldbank.org/consultation/review-and-update-world-bank-safeguard-policies>