



Review and Update of the World Bank’s Environmental and Social Safeguard Policies Phase 2 Consultations – Feedback Summary

Date: November 3, 2014

Location: Beirut, Lebanon

Audience: Civil Society Organizations

Overview and Key Issues Discussed:

The CSO consultation session took place in the WB Beirut Country Office. It was attended by 19 representatives of Civil Society Organizations. Simultaneous interpretation was provided. The discussion was rich, constructive and positive.

Specific Feedback from Stakeholders
1. General Comments
<ul style="list-style-type: none"> • Participants commended the Bank for holding the consultation session in Arabic and that the invitation to the session was sent out within an appropriate timeframe with documents provided in both English and Arabic • Will the Bank also consult on the directives, guidelines and procedures once they are developed? • Clarify how the OPs/BPs will be replaced by the new standards. • The bank should consult with other donors and development partners to ensure consistency between different funding organizations. • Clarify how country specific issues are taken into consideration. Namely geographic particularities. • The overall tone of the framework and its formulation puts the borrower in a submissive position. Words such as: Compliance \ acceptable \ unacceptable \ national regulations \ due diligence \ compensation \ Security- should be revisited. These are all examples of a direct interference in a country’s sovereignty. When such notions as acceptance or non acceptance are introduced, how are acceptance levels determined and by whom? For example, setting the standards of sustainable development in the environmental sector should be a social responsibility.
2. A Vision for Sustainable Development
<ul style="list-style-type: none"> • Does the Bank have any interest in influencing human rights policies in a country through the compliance with the ESF policies? How can the bank use leverage to enforce compliance? And will there be any mechanism to report violations? Will sanctions be applied in the case of non-compliance? Will project financing be affected? • Why isn’t “Governance” included as a criteria for sustainable development? •
3. World Bank Environmental and Social Policy

Specific Feedback from Stakeholders
<ul style="list-style-type: none"> • Will the standards also be applicable to sub-projects implemented in the context of World Bank financed operations? • What's the implementation timeframe of the new ESF? Will it be applicable to projects already underway? • There is a need for more emphasis on supervision. How will this be ensured? A lot of gaps are revealed at the end of the implementation period of certain projects. • Clarify who is responsible for final decision on the framework. Is it the Board? • There is a problem in the interpretation of objective or policy. Need for more clarity and more elaboration of the policies. There is also no consistency in the inclusion of standards and international treaties. • How will the enforcement of the standards be audited? • Should we be focusing on standardization as an ultimate goal or on helping out the poor improve their living conditions? Standards should be somehow flexible and negotiable, not left to Board decision but rather decided upon at the regional level • While including people with disabilities in the framework is a welcomed initiative, yet the reference in the document to the disabled as "vulnerable groups" is not appropriate. There is also a mention of the mentally disabled. Suggestion to substitute all those by "the disabled" without the need to make any distinction between physical or mental, nor to list the types of disabilities. • Along the same lines, we encourage the Bank to include specific reference to the conventions on the rights of persons with disability. • The human rights issue should be strengthened. Would the Bank consider taking a stronger stance with governments that violate human rights?
4. Environmental and Social Standard 1 (ESS1): Assessment and Management of Environmental and Social Risks and Impacts
<ul style="list-style-type: none"> • Does the Bank carry out an ex post impact assessment of its project on the environment? If so, how?
5. Environmental and Social Standard 2 (ESS2): Labor and Working Conditions
<ul style="list-style-type: none"> • IFC as well as other MDBs have adopted ILOs five core labor standards. They should also be incorporated in the World Bank's ESS2 on labor.
6. Environmental and Social Standard 3 (ESS3): Resource Efficiency and Pollution Prevention
<ul style="list-style-type: none"> • More details should be provided in the Standards on specific pollutant and GHG emission levels, and resource utilization values.
7. Environmental and Social Standard 4 (ESS4): Community Health and Safety
<ul style="list-style-type: none"> • More emphasis should be placed on gender issues as related to community health and safety, and the general development agenda in general.
8. Environmental and Social Standard 5 (ESS5): Land Acquisition, Restriction on Land Use and Involuntary Resettlement
<ul style="list-style-type: none"> • Does this standard apply to the Syrian refugees?
9. Environmental and Social Standard 6 (ESS6): Biodiversity Conservation and Sustainable Management of Living Natural Resources

Specific Feedback from Stakeholders
10. Environmental and Social Standard 7 (ESS7): Indigenous Peoples
11. Environmental and Social Standard 8 (ESS8): Cultural Heritage
<ul style="list-style-type: none"> • Governments do not have strong mechanisms to manage heritage sites, such as the Baalbek area. The Bank should place a strong emphasis on these issues through its projects. • Who decides what is an acceptable impact from a project on a heritage site? Is it the Bank or the Government? What is the roles of the civil soecities in Bank projects in this area?
12. Environmental and Social Standard 9 (ESS9): Financial Intermediaries
<ul style="list-style-type: none"> • How would the Bank ensure proper supervision when many sub-projects would be implemented using the national environmental systems.
13. Environmental and Social Standard 10 (ESS10): Information Disclosure and Stakeholder Engagement
<ul style="list-style-type: none"> • How will transparency and disclosure of information be ensured? • Will the framework include policies on how to deal with the negative impacts which were not initially forseen under certain projects? A participant referred to the Cementerie Nationale in North Lebanon which has caused tremendous health hazards and damages to the citizens of the area. • There is a perception that Governments force certain groups to be p resent in public consultations to reduce the tone of criticism. Therefore, it is important that the Bank would develop guidelines for what is considered meaningful consultations.