



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

Date: March 4, 2015

Location: Yaoundé, Cameroon

Audience: Government Officials

No. of Participants: 42

Overview: Bank representatives welcomed Cameroonian participants consisting of Government Officials and Project Implementations Units (PIUs). An overview of the process to date was provided followed by a presentation of the “Draft Environment and Social Framework: Setting Standards for Sustainable Development”. The floor was opened for discussion and participants shared detailed comments on the draft framework while also seeking clarification on various aspects of the proposed ESSs and board approval process. A summary of the discussion can be found below.

Specific Feedback from Stakeholders
1. General Comments
<ul style="list-style-type: none">• Participants congratulated the WB for contributing to increasing the safeguard level regarding environmental and social risk coverage within its projects. The strengthening of standards will certainly benefit countries by improving the social and environmental performance of projects.• However, participants also highlighted the fact that this review and update of the WB after 20 years, need to be in sync with the legislations of the countries which in such time lapse have improved. Participants asked how they could strengthen the implementation of their national standards Participants also expressed their concern on resources for M&E as that will entail additional funding with the projects that are being implemented. They asked were would those resources come from? How will the financial and human capital resource gap be addressed?• Participants also expressed the need for strengthening capacity.• Need to address in a better manner FCS matters and natural disaster conditions in the draft ESF? What are the provisions in the framework in these two cases?• Participants also expressed concerns on the issue of conditionalities.

- The strengthening of environmental and social standards leads to additional requirement needs for the implementation of projects funded by the Bank, and consequently affects the overall cost of the projects. What are the compensatory measures the WB will put in place for countries like Cameroon? What are the additional resources that the WB will be able to provide for this purpose?
- Participants' highlighted concerns on meeting some Human Rights provisions that could contradict their laws (i.e., sexual orientation/ homosexuality, which in the case of Cameroon is illegal). It could also create confusion and tension.
- Participants also expressed concerns on the increase in length and requirements of the safeguards process. This could be perceived as an additional burden for governments. Need for simplification.
- Need to address these international standards and country systems? How to work with that? Which should prevail in case of differences?

2. A Vision for Sustainable Development

- Need for clarifications on certain Human Rights provisions.
- Some matters on non-discrimination could escalate tensions.

3. World Bank Environmental and Social Policy

- Participants expressed concerns and sought clarification on the common approach. What happens in cases of co-financing? Who adapts to which requirements?
- What would be done in the case of IFC standards and these new IBRD standards for projects that have both institutions as lenders?

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

- Participants congratulated the WB for a more adaptive approach and the Environmental and Social Commitment Plan (ESCP) that the Borrower must sign and comply with. These are well received innovations, but it also raises concerns since when there is a change in EA category, more studies are to be conducted and also more costs or resources are needed. The change of category may lead to an extension of the deadlines in terms of resettlement.
- Page 22, Par 6 - profitability of the project (it has an impact on the investment cost) Today can the WB tell the government in a broad manner, what this strengthening will imply in terms of the investment cost?
- There is need for clarification regarding the ESCP. How will that be done? This is an additional document that needs to be prepared for the WB. Will there be additional consultations to review the ESCP presented by the borrower?
- What is the difference between the ESCP and the ESMF?
- Suggestion: The WB needs to give an indicative list of projects that are considered high risk, or leave the national legislation to decide what will be looked as high risk.
- Request for clarification – Need to highlight what has been retained in the new framework. We are currently producing about 4 safeguard documents per project: Environmental Impact Assessment, Environmental and Social Management Plan, Resettlement Action Plan, and Indigenous Peoples Plan. Need of clarifications in terms of safeguard documents that will need to be prepared going forward.

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

- Need to address labor stability. The introductory paragraphs recognize job generation and revenue generation. This is related to job security and sustainability. Could the WB add job stability to also protect the interest of communities?

<ul style="list-style-type: none"> On the issue of civil servants there are usually double standards in the implementation of projects. Why do we have para 4? Is this point 4 final? Or could it be changed? Civil servants who are seconded to projects should be treated the same as other civil servants.
6. Environmental and Social Standard 3 (ESS3): Resource Efficiency and Pollution Prevention
<ul style="list-style-type: none"> Regarding competing usages of water, how to then address water management properly? Need for cumulative and induced impact assessments. Needs of communities should prevail.
7. Environmental and Social Standard 4 (ESS4): Community Health and Safety
<ul style="list-style-type: none"> There was no discussion of this issue.
8. Environmental and Social Standard 5 (ESS5): Land Acquisition, Restriction on Land Use and Involuntary Resettlement
<ul style="list-style-type: none"> When addressing compensation: what would happen in a project with an area funded by the WB and another area next to it funded by the government with its own policies? It is clear that compensation amounts are usually higher. What should the government do in this case? Do we ignore national laws to implement to give precedence to the WB requirements? This raises the question of two standards and this is a challenging matter for the government. Clarification request: need to have a distinction between physical displacement and economic displacement.
9. Environmental and Social Standard 6 (ESS6): Biodiversity Conservation and Sustainable Management of Living Natural Resources
<ul style="list-style-type: none"> Biodiversity –need to address it at the local level. Could local communities be strong stakeholders in addressing biodiversity protection issues? If we have ownership in our local communities there would be better project outcomes, this could be an opportunity to do so. If local communities are trained in this issue, it will be easier to address protection of biodiversity. Need for local stakeholders. It’s a matter of scale. Compensation for fauna and flora preservation is needed. I.e., if you tell people not to eat bush meat because it is a particular species, he will continue hunting this particular species since it is its only source of food. What is provided for in terms of compensation?
10. Environmental and Social Standard 7 (ESS7): Indigenous Peoples
<ul style="list-style-type: none"> When it comes to Free, Prior and Informed Consent (FPIC), why is it particular to Indigenous Peoples (IPs) only? What about other affected communities? In AFR there is an issue of IPs’ categorization – the Government focuses more on the concept of vulnerability. In the case of this standard, the fact that the Cameroon government has not yet make a commitment to the IP concept, what would that imply in terms of implementation? Need for clarity on the definition of IPs and also the different references throughout the draft ESF (i.e., IPs, vulnerable groups, marginalized groups, minorities, affected communities, etc.) Need of a definition of IPs. Is the WB talking about first settlers or people like the pygmies? Indigenous means people who settled first in an area? Or people who have been involved in the project? Need for clarification. FPIC can take a long time. How will this affect project financing?
11. Environmental and Social Standard 8 (ESS8): Cultural Heritage

- Para 7 – description of cultural heritage is not taking into account a number of requirements. ESS8 should complement ESS7. (i.e., Confidentiality is not addressed here. Why? Access of the community to cultural heritage is important. This requirements should also apply to IPs)
- ESS8 point D on trading of intangible cultural heritage. Para 22 mentions informing population or communities. It will be necessary to have their prior consent. UNESCO convention on the preservation on intangible resources requires prior consent in order to use their cultural heritage practices.

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

- There was no discussion of this issue.
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13. Environmental and Social Standard 10 (ESS10): Information Disclosure and Stakeholder Engagement

- Need to have capacity building for affected communities. What will be the role of affected communities on M&E? How to empower them?
- When we are talking about consultations this could cause social problems.. If we start consultations there will be discrimination because some groups due to their sexual orientations cannot define themselves. So what would be done then? How can we apply this for our local people?
- For religion reasons, a parent can decide he does not want his kids to be vaccinated. But the policy of the school is to vaccinate all kids for prevention measures, so as not to expose the other children. Would this be considered discrimination on religious grounds?
- How to manage a situation where the ESSs are not respected, yet the project has already been funded? What other measure will require the borrower to obey by the requirements?
- What is the role of the WB in monitoring? Should it only be a responsibility of the borrower?
- Will the WB fund measures on M&E?
- Need more emphasis on face-to-face consultation.

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

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>