



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

Date: October 28, 2014

Location: Cairo, Egypt

Audience: Civil Society Organizations, Non-Governmental Organizations, and Academia

Overview:

Bank representatives welcomed the participants, in total about 70 persons with high participation from syndicates, labor unions and CSO representatives with special needs. They provided an overview of the process undertaken to date on the review and update of the policies and presented the draft “Environmental and Social Framework: Setting Standards for Sustainable Development.” Participants were then invited to ask questions and to express their views.

After reviewing this consultation summary, participants submitted additional comments to ensure their views were adequately represented. These comments can be accessed [here](#).

Specific Feedback from Stakeholders
1. General Comments
<p><i>Comments:</i></p> <ul style="list-style-type: none"> • Participants commended the Bank’s inclusion of a dedicated standard on labor issues as well as mention of the rights of the disabled. • Participants commended the Bank for engaging a wide range of CSOs, including a number of disability groups and grassroots organizations. • A participant criticized the Bank for organizing a one day consultation meeting to discuss ten proposed standards, arguing it is too short. The Bank was encouraged to organize dedicated workshops on each proposed standard. • A participant stressed that the new standards should be about protecting the people regardless of politics. Despite positive aspects introduced in the new Framework, there are many that are negative and diluted. Standards proposed are subordinate to those in international conventions and more importantly inferior to UNCHR international agreements. • Participants urged the Bank to revise the Arabic translated documents, and highlighted that certain terminology in the Arabic version is inaccurate. • Standards are not clearly formulated. They open the door for interpretation. <p><i>Recommendations:</i></p> <ul style="list-style-type: none"> • Spell out who is represented under the term “stakeholder”. The Bank should ensure it is not limited to Borrowers only. • A participant stressed that there should be a stronger focus on sustainability of projects for future generations • A participant suggested that the Bank provide recommendations for NGOs it trusted to get funds. This recommendation would be of high value when applying for funds.

Specific Feedback from Stakeholders
2. A Vision for Sustainable Development
3. World Bank Environmental and Social Policy
<p><i>Comments:</i></p> <ul style="list-style-type: none"> • The ESSs put all the responsibility on the borrower while the Bank’s role is just due diligence which is a loose definition. • Shifting responsibility to the Borrower only means that the World Bank is moving away from it. <p><i>Recommendations:</i></p> <ul style="list-style-type: none"> • Participants hailed the Bank for including the rights of the physically and mentally disabled in the Bank policy. However, participants mentioned their rights should be further emphasized each time they occur in all the E&S standards and better assessment of specific issues related to disability should be required.
4. Environmental and Social Standard 1 (ESS1): Assessment and Management of Environmental and Social Risks and Impacts
<p><i>Comments:</i></p> <ul style="list-style-type: none"> • A participant stated there is a real problem regarding supervision after implementation to which the Bank needs to pay special attention. • Special consideration needs to be given to cumulative impacts and reversing negative impacts. • Bank should conduct environmental and social studies before granting a loan and agreeing on a project. • Civil society should be included in the EA review.
5. Environmental and Social Standard 2 (ESS2): Labor and Working Conditions
<p><i>Recommendations:</i></p> <ul style="list-style-type: none"> • Participants welcomed the standard on labor and working condition, especially indicating clear regulations regarding child labor; however, the participants highlighted the need to indicate clear regulations regarding women’s labor. • Existing ILO labor conventions should be referenced and need to be enforced. • Child labor should be completely prohibited. • Information should be made visible in workplace. • Should have requirement on minimum wage. • A participant recommended to define a certain ratio for disabled workers in Bank-funded projects. • The roles of occupational syndicates should be clearer, especially in GRM.
6. Environmental and Social Standard 3 (ESS3): Resource Efficiency and Pollution Prevention
<p><i>Comments:</i></p> <ul style="list-style-type: none"> • Energy is one of the critical issues in Egypt where the Bank should play a key role. Energy efficiency should be an integrated dimension in all World Bank projects. Measures should be put in place to control it. • A participant urged the Bank to only fund projects that are part of the green economy. In Egypt, there is a clear problem of air pollution and waste. • There are contradictions between the social standards for labor and what is in the IFC report of 2014; the latter has some inadequate standards for reducing manpower as it is perceived

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<p>as more efficient for business.</p> <ul style="list-style-type: none"> The issue of desertification and crop adaptation was mentioned as an important issue in the region.
7. Environmental and Social Standard 4 (ESS4): Community Health and Safety
8. Environmental and Social Standard 5 (ESS5): Land Acquisition, Restriction on Land Use and Involuntary Resettlement
<p><i>Comments:</i></p> <ul style="list-style-type: none"> A participant mentioned the difficulty of bridging the gap when standards are not in line with national law (ex: compensation; cut-off date procedure). <p><i>Clarifications:</i></p> <ul style="list-style-type: none"> A participant asked the Bank to clearly differentiate between compensation and remuneration. Compensation should mean “reversing the harm.”
9. Environmental and Social Standard 6 (ESS6): Biodiversity Conservation and Sustainable Management of Living Natural Resources
10. Environmental and Social Standard 7 (ESS7): Indigenous Peoples
11. Environmental and Social Standard 8 (ESS8): Cultural Heritage
12. Environmental and Social Standard 9 (ESS9): Financial Intermediaries
13. Environmental and Social Standard 10 (ESS10): Information Disclosure and Stakeholder Engagement
<p><i>Comments:</i></p> <ul style="list-style-type: none"> Despite a very clear shift in the new standards towards meaningful consultation and stakeholder engagement (especially with a standalone ESS indicating a need for an ongoing process), some of the participants questioned whether this will happen on the ground, claiming that requirements for consultation are now more about ticking boxes. Participants urged the Bank to clearly state how the consultations will be conducted. Many World Bank funded projects have led to people’s impoverishment, which could be avoided if Bank ensured appropriate access to information, accuracy of disclosed information and clear specifications for time for disclosure. Good intentions are not sufficient. Holding a dialogue and consulting with project affected people is a must. A participant urged the Bank to conduct dedicated consultations with the disabled under project implementation.

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The Bank representatives thanked everyone for their inputs and encouraged participants to submit inputs in writing, in particular on topics that were the subject of much discussion during the consultation, such as labor, stakeholder engagement and Borrower's national system.

The address for submitting feedback is:

<https://consultations.worldbank.org/forums/forum-review-and-update-world-bank-safeguard-policies>

Additional information, including links to the policies, fact sheets on the Framework and a Q&A, can be found at: <http://consultations.worldbank.org/consultation/review-and-update-world-bank-safeguard-policies>