



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

Date: November 25, 2014

Location (City, Country): Dhaka, Bangladesh (Shomadhan Conf. Room, Lakeshore Hotel)

Audience (Government, CSO, etc.): NGO, CSO, Academia

Overview and Key Issues Discussed: This summary is subject to change after review and comments from consultation participants.

| Specific Feedback from Stakeholders |
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| 1. General Comments |
| <ul style="list-style-type: none"> • Excellent presentation! (on the Bank's draft of the new E&S policy framework). • Does the Bank have plans for transboundary projects? • Bangladesh is one of the most vulnerable countries for climate change. Does the Bank envision a future bigger role in this area? • Would WB consider giving support directly to local communities? • You have to be more precise in the standards, they sound more like policies. Why rename policies to standards? • It's good that environmental health and safety as well as community health and safety have been addressed. • IFC has all sorts of guidelines. Are you going only to refer to IFC? Fully adopt them? Or have your own? • Climate change has been mentioned in one of the ES's which is commendable. But to do EIA's you need specific tools that may be sophisticated. How are you going to ensure that people have the necessary expertise and tools? Capacity building should be addressed. • Changing risk category of a project to a lower level should not happen. There should be better monitoring and implementation support. This should preferably be done by a third party. • Introduce Theory of Change. That way you would get the indicators easily. • Standards should be complementary to existing laws. "Paper Tigers" should have teeth (monitoring), otherwise, effectivity of standards will not be sustained. • Concern was expressed on the need to invest more on capacity building in order to improve the efficiency in the application of the policy. |
| 2. A Vision for Sustainable Development |
| <ul style="list-style-type: none"> • This proposal sets new standards for sustainable development. |

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| 3. World Bank Environmental and Social Policy |
| <ul style="list-style-type: none"> • WB never addressed exclusion before. Some topics in the IP standard are related to inclusion. But inclusive design and development are not addressed. • Why not have an Inland-Water Quality Management policy? (technical, physical, chemical, biological). |
| 4. Environmental and Social Standard 1 (ESS1): Assessment and Management of Environmental and Social Risks and Impacts |
| <ul style="list-style-type: none"> • |
| 5. Environmental and Social Standard 2 (ESS2): Labor and Working Conditions |
| <ul style="list-style-type: none"> • This standard does not fully reflect ILO conventions (example: 8798?) • The Bank should ensure that in all Bank lending, human rights are respected, as well as the right to form unions and occupational health and safety. It was mentioned that the existence of industrial police unit is a breach of human rights as is the extra-judicial killings. • The draft has a huge deficit, even if compared to IFC and other regional development Banks. Must be in line with ILO conventions. • President Kim said that WB would respect ILO conventions but in the draft there is no mention of ILO conventions. Why can't WB take the lead? • Another important point is that in ESS2 all reference to contract and sub-contract workers by the project is excluded. • MDB's recognize documentation of workers. WB should recognize documentation of workers to recognize obligations. • Many countries have common membership between ILO and WB. Take advantage of this. • A mechanism for implementation of occupational health and safety should be established, such as a committee. • Also the right to refuse dangerous work must be included. • Fundamental rights of workers should be respected. All workers should have ID cards and documentation. |
| 6. Environmental and Social Standard 3 (ESS3): Resource Efficiency and Pollution Prevention |
| <ul style="list-style-type: none"> • |
| 7. Environmental and Social Standard 4 (ESS4): Community Health and Safety |
| <ul style="list-style-type: none"> • Pesticide use is controlled by the private sector. Government has very little control. How are you going to fix this? • |
| 8. Environmental and Social Standard 5 (ESS5): Land Acquisition, Restriction on Land Use and Involuntary Resettlement |
| <ul style="list-style-type: none"> • "Development induces displacement". Projects take into consideration the immediate but they don't see what will happen in the long term, a number of years in the future. • Also, you look at ownership of land but how about free access to land? • Benefits should be promoted for the community and should be properly communicated. There should not only be compensation but also benefits. |
| 9. Environmental and Social Standard 6 (ESS6): Biodiversity Conservation and Sustainable Management of Living Natural Resources |
| <ul style="list-style-type: none"> • |

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

- Is there any vision for Bangladesh where the WB does not recognize Indigenous Peoples?

11. Environmental and Social Standard 8 (ESS8): Cultural Heritage

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

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

- Local people have no access to project information disclosure.
- Consultation should be continuous. There should be a public hearing at the end of the project.
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