Model Proposal:
Climate Change Assessment (CCA) Safeguard Policy

Submission to the World Bank Safeguard Policy Review
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This paper was drafted on the basis of the input provided by the below signed organizations.

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Unlike many institutions, the Bank has not yet formally integrated climate issues into its operational policies. Most notably, the current Safeguard Policy framework does not adequately address the challenges a changing climate presents to client governments, donor governments, affected communities, local ecosystems and the global commons. At present, the Bank lags behind other financial institutions that have gone further to integrate climate-related issues into their environmental and social policies, including the Inter-American Development Bank, the Asian Development Bank, and many bilateral and private-sector actors.

The Safeguard Policy Review presents an important opportunity for the Bank to adopt best practices for promoting low-carbon and resilient development in its operational policies by establishing a stand-alone safeguard policy on climate change. The existing Bank safeguards apply to all climate-related activities. This policy is not meant to supplant or weaken any of them; it rather covers aspects not already covered by the existing safeguards.

The below signatories are pleased to submit this proposal for a **policy on climate change assessment** (CCA) to the World Bank Safeguard Policy Review. This CCA policy proposal outlines some of the main priorities for the Bank to introduce as part of a stand-alone policy safeguard on climate change.

The priority reforms outlined in the proposal include:

- Establishing an effective CCA coverage to all Bank instruments;
- Ensuring climate change risk assessments for the country, sector, program, pre-project, project and post-project levels;
- Ensuring a policy architecture that preserves clear climate change requirements in all stages of the project cycle;
- Ensuring requirements for routine use of cumulative impact assessment;
- Ensuring the implementation of climate change management and/or action plans;
- Ensuring the environmental and social safeguards apply to climate change activities.

This initial policy statement is limited by the pending questions about policy architecture, scope, emerging issues and other aspects for which independent expert panels have been convened or the Bank has yet to signal its preferences. Our proposal will evolve as we learn more on the implementation of the World Bank Strategy, the development of the Country Partnership Framework, the internal change process, and the Bank indicates more clearly a direction for a new safeguard policy framework.

President Jim Kim has made it clear that the safeguard review will not entail any dilution of existing policies and that strong action on climate change is essential for the World Bank Group implementing the goals of its corporate strategy in ending extreme poverty and promoting shared prosperity. Mainstreaming climate change risk assessments into all Bank lending is a clear existing deficiency that needs to be addressed, with the safeguards review presenting an important opportunity, and first step with which to do so.

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CARE International – Poverty, Environment and Climate Change Network, International

CEE Bankwatch Network, Regional, Europe

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Center for Human Rights and Environment (CEDHA), Argentina

Center for International Environmental Law (CIEL), United States of America

Center of Hands-on Actions and Networking for Growth and Environment (CHANGE), Vietnam

Centre for Nature Conservation and Development (CNCD), Cameroon

Centro de Incidencia Ambiental (CIAM), Panama

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Change Partnership, Belgium

Christian Aid, United Kingdom

CIVICUS, International

Client Earth, Poland

Columban Mission Institute, Centre for Peace Ecology and Justice, Australia

Conservation Action Trust, India

Conservation International, International

Consumers Union of Tajikistan, Tajikistan

Corporación Fiscalía del Medio Ambiente, Chile

CounterCurrent – GegenStroemung, Germany

DAR, Peru

Earthjustice, United States of America

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Garjan.org, Nepal

Global Responsibility - Austrian Platform for Development and Humanitarian Aid, Austria

GLOBE México, Mexico

Green Development Advocates (GDA), Cameroon

Green ID, Vietnam

Green Policy Institute, Bulgaria

Greenpeace, International

groundWork, Friends of the Earth, South Africa

GUTTA-CLUB National Center for children and Youth, Moldova

Hadassa, Gabon

HELIO International, France

IFI Watch Myanmar, Myanmar

Initiative to Keep Hasankeyf Alive, Turkey

Interamerican Association for Environmental Defense (AIDA), Americas

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Instituto de Políticas para el Transporte y el Desarrollo (ITDP), Mexico

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International Rivers, International

Jal Sarokar Manch-JSM, Nepal

Jamaa Resource Initiatives, Kenya

Japan Center for a Sustainable Environment and Society (JACSES), Japan

Jeunes Volontaires Pour L'environment, Togo

Jeunes Volontaires pour l'Environment, Nepal

Jubilee, Australia

Justicia para la Naturaleza, Costa Rica

KEPA, Finland

Kiko Network, Japan

KOO- Coordination office of the Austrian Bishop's Conference for Development and Mission, Austria

Land Empowerment Animals People (LEAP), Malaysia

Les Amis de la Terre (Friends of the Earth), France

Lumière Synergie pour le Développement, Sénégal

MAUDESCO, Mauritius

MENA Youth Climate Movement, Middle East and North Africa, Regional

National Association of Professional Environmentalists (NAPE), Uganda

National ecological centre of Ukraine, Ukraine

ONG Carbone Guinée, Guinée Conakry

ONG MER BLEUE, Mauritania

OT Watch, Mongolia

Oxfam, International

Public Advocacy Initiative for Rights & Values in India (PAIRVI), India

Qendra "Grupimi Ekolevizja", Albania

River without Boundaries, Mongolia

Sierra Club, United States of America

South Asian Dialogues on Ecological Democracy, Regional, South Asia

Southeast Asia Renewable Energy People's Assembly, International

St. Columban's Mission Society. Australia

SustainUS, United States of America

Taiwan Environmental Protection Union, Taiwan

The Egyptian Centre for Economic and Social Rights, Egypt

The Environmental and Natural Resources Law Center (CEDARENA), Costa Rica

The Good Land Development and the Environment Society, Jordan

The Mexican Environmental Law Center (CEMDA), Mexico

The Peruvian Society for Environmental Law (SPDA), Peru

The Society of St. Columban, Japan

VOICE (Voice for Interactive Choice and Empowerment), Bangladesh

World Team Now, United States of America

Worldview, Gambia

Abbreviations

BAT – Best Available Technology

CAF – Cancun Adaptation Framework

CCA – Climate Change Assessment

CCMF – Climate Change Management Framework

CCMP – Climate Change Management Program

CRA – Climate Resilience Assessment

CAS – Country Assistance Strategy

CPS – Country Partnership Strategy

CPF – Country Partnership Framework

CFC - Chlorofluorocarbons

CCAC – Climate and Clean Air Coalition

GHG – Greenhouse Gases

GHGA – Greenhouse Gas Accounting

GWP – Global Warming Potential

GTP – Temperature Change Potential

HCFC - Hydrochlorofluorocarbons

HFC - Hydrofluorocarbons

IMO – International Maritime Organization

IRP – Integrated Resource Planning

LEDS – Low Emission Development Strategies

LULUCF – Land Use, Land Use Change and Forestry

NAMA – National Appropriate Mitigation Actions

NAP – National Adaptation Plans

PCB - Polychlorinated biphenyls

SESA – Strategic Environmental and Social Assessment

UNFCCC – United Nations Framework for Climate Change

WBG – World Bank Group

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Climate Change Assessment (CCA) Safeguard Policy

Introduction

1. The Bank requires climate change assessment (CCA) of all activities proposed for Bank financing to help ensure that they are sustainable and sound from the climate change perspective[i] and thus to improve decision making and outcomes.

2. The CCA safeguard operational policy applies to all stages of the project cycle, including pre-identification planning, preparation and implementation.

Principles

3. The CCA will assist the Bank to make sure that the investments it carries out do not increase net GHG emissions of the Bank portfolio and do not increase vulnerability or risk to communities and ecosystems within or beyond their area of influence (i.e. are not maladaptive), and if they do, they must take measures to reduce vulnerability and mitigate risk.

4. Climate Change Assessment will assist the World Bank Group and borrowers to meet their international and national objectives to address human-induced climate change and understand different plausible scenarios relating to climate change effects. Its tools and methodologies for evaluating the climate change consequences of proposed policies, programs, plans, and projects will help in formulating and conducting appropriate mitigation measures to reduce greenhouse gas emissions, and promote adaptation measures to reduce and manage the effects of climate change, as well as the effects the project will have on the host community.

5. Climate Change Assessment underscores the importance of managing climate change performance throughout the life of a project. An effective Climate Change Assessment (CCA) is a dynamic and continuous process initiated and supported by management, and involves engagement between the borrower, its workers, local communities directly and indirectly affected by the project (the Affected Communities) and other stakeholders. A good CCA is appropriate to the nature and scale of the project, promotes sound and sustainable climate change performance, and can lead to improved financial, social, and environmental outcomes.

Objectives

6. The objectives of World Bank's CCA safeguard policy are:

    i. To identify the direct or indirect impacts of the project, policy reform, or plan in increasing or decreasing greenhouse gas (GHG) emissions;
    ii. To identify the vulnerability and resilience of communities and ecosystems to adverse effects of climate change;
    iii. To identify any material effects on the environment and communities that are potentially

triggered by climate change;

iv. To identify and implement alternatives and measures, especially ecosystem-based approached, to adapt to and/or to mitigate climate change that minimize social costs and maximize social benefits;

v. To select the best projects, policy reforms, and plans that will promote resource efficiency and shift countries onto a low carbon development path;

vi. To help the Bank and its borrower establish synergy, integrate the policy, project, and plan with any existing or planned climate related measures in the broad impact area.

Roles and Responsibilities

7. The World Bank is responsible for assessing risk at a strategic level through the country partnership framework/interim strategy note and the preparation of a country climate change risk assessment, screening projects for an initial understanding of potential climate change risk to provide this information through World Bank's safeguard implementation process, for conducting due diligence to verify project information, including the adequacy of Alternatives Assessment, and for reviewing, monitoring, and supervising projects throughout the World Bank's project cycle in conformity with the principles and requirements embodied in the CCA Operational Policy. In the event that the borrower rebuts this presumption, the World Bank reviews and makes public such evidence as well as the Bank's final determinations related to the presumption.

8. For Category A energy, forest, transport and water projects, as well as auxiliary infrastructure supported by development policy loans, the borrower is required to engage an advisory panel of independent, internationally recognized climate change specialists to advise on all aspects of the project relevant to the CCA.[ii]

9. The Bank reviews the findings and recommendations of the climate change project management and/or action plan,[iii] including proper disclosure and consultation, in accordance with Bank's Safeguards, to determine whether it provides an adequate basis for processing the project for Bank financing, and is responsible for borrower compliance with the Bank's CCA requirements. When the borrower has completed or partially completed CCA work prior to the Bank's involvement, the Bank reviews the CCA to ensure its consistency with this policy. The Bank may, if appropriate, require additional CCA work for projects that have already advanced prior to the Bank's involvement, including public consultation and disclosure, as per Bank safeguards. The Bank provides adequate, financial and other, support to enhance borrower capacity to meet policy requirements.[iv]

10. The World Bank does not finance projects that do not comply with its CCA policy and procedures, nor does it finance projects that do not comply with the host country's climate change laws and regulations, including host country obligations under international law. The World Bank does not finance projects that are in conflict with host country climate change objectives as set under international frameworks. The World Bank will prioritize projects that will help countries meet their international climate commitments.

11. CCA requires the Bank to develop a classification of project-types on the basis of generic intensity of their climate change impacts, which will guide the Bank, the country of project and the borrower on project prioritization/selection.

12. The borrower, in coordination with other responsible government agencies and third parties as appropriate, will conduct a process of climate change assessment, and establish and maintain a CCA appropriate to the nature and scale of the project and commensurate with the level of its climate change risks and impacts, as dictated by its risk categorization. The CCA requires the borrower to quantify the direct, indirect, induced and cumulative climate change impacts associated with a project, both ex ante as part of project appraisal and Alternatives

Assessment, and ex post as part of project monitoring. The CCA will incorporate the following elements: (i) policyv; (ii) identification of risks and impacts; (iii) management programs; (iv) organizational capacity and competency; (v) stakeholder engagement, as per Safeguard requirements; and (vi) monitoring and review, as per Safeguard requirement. Additionally, the Borrower will use the "best available technology" to improve efficiency and reduce emissions of greenhouse gases and short-lived climate pollutants. As climate change impacts on vulnerable communities are often magnified with displacement/denial of access to land and water resources, the Bank is required to integrate these into the CCA safeguards policy.

13. The assessment and management of certain project impacts on climate change may be the responsibility of the third parties. An effective CCA should identify the different entities involved and the roles they play, the corresponding risks they present to the borrower, and opportunities to collaborate with these third parties in order to help achieve the best climate outcomes that are consistent with the Safeguards.

Climate Change Screening

14. World Bank screens and categorizes all Bank funded projects for climate change risks and impacts at the earliest stage of project preparation. Screening and categorization is undertaken to (i) reflect the significance of potential impacts or risks resulting from emissions of the project and which in turn can trigger negative effects on climate or heightens risks to climate vulnerable systems/resources or sectors; (ii) assess the risk associated with climate change on the project, including synergic effects of all projects that influence the area; (iii) identify the level of assessment and institutional resources required for the safeguard measures; and (iv) determine disclosure requirements.

    Each proposed project is scrutinized as to its type, location, scale, and sensitivity and the magnitude of project impacts on climate. For the following projects, a CCA is required:

    (i) **Category A.** A proposed project is classified as category A if it may have significant climate impacts. Please refer to the presumptive list of Category A activities for additional information.

    (ii) **Category B.** A proposed project is classified as category B if its potential climate impacts are moderate. These impacts are reversible, and in most cases any risk mitigation measure can be designed more readily than for category A projects.

    Financing provided to **financial institutions** is screened in light of known or potential on-lending to third parties, which will be accorded the same weight as if provided directly by the Bank to the third party.

Climate Change Assessment Content

15. CCA is initiated during the Country Partnership Framework/Partnership stage. CCA examines and recommends project, program, and policy[vi] alternatives based upon independent, and accountable cost-benefit analysis that prices all relevant climate change mitigation and adaptation options; identifies ways of improving project selection, siting, planning, design, and implementation by rigorous application of the mitigation hierarchy.

16. CCA identifies relevant country climate change plans which set objectives for climate change adaptation and mitigation. Where such objectives are not available, the CCA is required to clearly define the objectives that the proposal is seeking to meet.

17. The degree to which a natural or social and economic system is susceptible to climate change can be determined at different levels. The CCA assesses to what extent areas, water resources, land use types, communities and socio-economic groups are vulnerable or at risk to climate change and how the proposed project, policy and/or plan changes the system/resource's climate vulnerability.[vii]

18. A changed climate and local weather affects the baseline environment against which impacts are assessed. Therefore, for those elements of the environment that are potentially affected by the proposal, the CCA identifies how the baseline environment will be affected by climate change, and assess impacts against this changed baseline. At least three climate change scenarios should be addressed: minimum change, intermediate change and maximum change.[viii] For proposals where the effects of climate change on the baseline environment are a minor issue, refining the baseline may require only the minimum and/or intermediate climate change to be evaluated. Alternatively, where climate change is an important issueix relative to the proposal, all three scenarios should be considered.x

19. Any project should recognize that climate change is expected to continue over multiple project cycles. The CCA explicitly identifies, evaluates and selects feasible ways that the project can be modified now and in the future to adapt to the effects of a changing climate. Such adaptation measures aim to increase resilience and recovery to withstand climate change, to adapt to the effects of climate change, and strengthen the capacity to adapt to climate change. CCA is required to identify and strengthen adaptation strategies and the knowledge systems that provide support for adaptation. They should be used to identify and manage a) the climate-related risks facing supported projects and the resilience to climate impacts of those projects; and (b) the impacts they will have on the resilience of local communities and ecosystems, for the range of potential climate change scenarios, at the same time as maximizing and ensuring a fair distribution of any and all benefits.

20. Consideration of different socio-cultural and socio-economic vulnerabilities and adaptive capacities within societal groups is an important component of CCA. The same is required by the environmental and social safeguards. Climate change can affect men's and women's roles and activities in agriculture, water management, land tenure and livelihoods in new, unplanned ways. Gender issues related to climate change should therefore be assessed and measures identified to address any and all the issues of different groups according to their unique vulnerabilities. Children, persons with disabilities, and other particularly vulnerable or disadvantaged groups are likely to suffer the impacts of climate change, including the health impacts of extreme temperatures, water or food shortages, and social disruptions, at disproportionate rates. For this reason it is crucial for CCA's to look at climate change related impacts on children, persons with disabilities, and other uniquely vulnerable groups. Particular attention should also be paid to potentially disproportionate adverse effects on poor populations in drought-prone, flood-prone, and coastal areas subject to potential climate change impacts.

21. Where the country has national or relevant sectoral climate change plans in which objectives for GHG emissions have been set, these objectives should be clearly identified, mainstreamed with and used in the CCA. Where such objectives are not available, the CCA should clearly define the objectives that the proposal is seeking to meet.

22. The CCA estimates the composition, magnitude and intensity of GHG emissions for each relevant element and phase of the proposal. This should be estimated by using a life-cycle approach and should include any effects of the proposal on carbon sinks. The estimate of the proposal's net emissions shall be evaluated in the context of any government or industry best practices and reduction targets or objectives.

23. The required Alternative Assessment identifies alternative plans and measures to reduce and/or avoid GHG emissions directly or indirectly, for example, by expanding the proposal or choosing

different projects, technologies or designs. The CCA explicitly identifies and evaluates alternative ways to reduce and/or avoid GHG emissions for all elements and phases of the proposal. Alternatives should be assessed on their economic feasibility not financial feasibility, and on their differential impacts on communities and ecosystems. Resource and energy intensive projects should be required to undertake efficiency audits and implement resource reduction and demand-side management strategies to identify and capture opportunities for efficiency improvements.[xi] The Bank should also require clients to adopt rigorous efficiency standards for the plant and equipment of the projects it supports.

24. The effects on climate change of any single proposal may be insignificant, but not when considered together with numerous other past, current and future projects. GHG emissions should therefore also be considered at a strategic level (typically policy, plan, program or sector) that addresses the cumulative effects of the individual projects. More significant GHG reductions can be achieved through such policies, programs and plans, and strategic environmental assessments (SEA) of them, rather than through individual projects.

25. Mitigation and adaptation may have different goals, and each can have consequences that interact in both positive and negative ways. The CCA assesses the interactions of mitigation and adaptation consequences and measures. Likewise, mitigation and adaptation have potential synergies with other environmental and social concerns that need to be addressed in order not to make decisions which could cause harm to communities and their environment.[xii]

26. Broad scientific consensus exists that the climate is changing; however, there is significant uncertainty about the predictions in the precise geographic area of the project. The CCA should address this uncertainty by explicitly:

    - Considering a reasonable, credible range of possible future climate scenarios.
    - Assessing the effects of climate change on the project, the beneficiaries, its goals and objectives.
    - Assessing the effects of the project on climate change.

27. For each climate change analysis, the CCA should provide an explanation and justification for how the results were obtained (the choices of methodologies and sources of data) and the degree of confidence that can be placed on the scenarios (of the plausible CC futures), data and results. It is recognized that while quantitative estimates are generally desired, quantitative analyses may not be feasible or cost-effective and qualitative analyses must be used; in such cases, the qualitative descriptors should be fully explained and the projections justified. This report shall be made available to the general public.

28. Making decisions about proposals that affect and/or are affected by climate change presents significant challenges, particularly since the implications are often long-term and uncertain. Once the climate change implications, including the uncertainties, are understood, decisions about the proposal should be based on the precautionary principle of "do no harm" and the principles of sustainable development and intergenerational equity.

29. CCA takes into account the variations in project and country conditions; the findings of country climate change studies; national climate change action plans; the country's overall policy framework, national legislation, and institutional capabilities related to the climate change aspects; and obligations of the country, pertaining to project activities, under relevant international climate change treaties, agreements and pledges.

30. Climate change management plans (CCMPs), and for some projects and programs, or action plans, should focus on both long-term and short-term CC risks, as well as risk mitigation and adaptation options, prioritizing those that increase synergies and improve sustainability, such as ecosystem-based approaches that provide multiple natural resource management benefits.

31. CCA ensures, as per generally accepted best practices, adequate baseline information, skill mix, budget, and proper sequencing. Adaptation and mitigation measures focus on top ranked impacts, agreed upon, scheduled, with identified responsibilities and specified durations. Total climate change budget is fully integrated part of overall project cost.

32. CCA assesses the policy context; similarly with the current Environmental Assessment[xiii] policy, CCA requires an assessment of the country's overall policy framework. CCA requires the Bank and its Borrowers to assess how subsidies and regulations may impede the Bank from achieving its sustainable development and climate mitigation objectives. CCA requires from the Bank and the Borrower to provide clear policy direction regarding how the regulatory landscape should be assessed and how the outcomes of those assessments should be factored into project decision-making. This will provide guidance as to what kinds of projects may or may not merit support given identified shortcomings in the regulatory and policy framework, and how better regulations should be considered as an alternative to a proposed project.

Climate Change Assessment Instruments

33. CCA requires the use of transparent planning and assessment to ensure that the Bank's activities are as low-cost, low-carbon, pro-poor, and sustainable as possible.

34. Depending on the project, program, policy, or plan, a range of instruments can be used to satisfy the Bank's CCA requirement at different levels and covering the strategic and pre-decision period and project and implementation period, while being always in compliance with the environmental and social safeguard policies:
    - Strategic: (1). Greenhouse Gas Accounting/Protocol (GHGA); (2). Country Climate Risk Assessments; (3). Low-Carbon Development Strategies; (4). National Appropriate Mitigation Measures (NAMAs); (5). National Adaptation Plans (NAPs); (6). National Action Plans to Reduce Short-lived Climate Pollutants; (7). Integrated Resource Planning (IRP); (8). River Basin Assessment; Strategic Environmental Assessment (SEA),
    - Project: (1). Climate Resilience Assessments for projects (CRA), (2). Best Available Technology Assessment (BATA); (3). Alternatives Assessment. (4). Full Life-cycle Accounting of Environmental and Social Externalities; (5). Cumulative Impacts Assessment (CIA); and (6) Open Source Impacts of REDD Incentives Spreadsheet (OSIRIS).

    Each aspect of these instruments, from screening through decision-making and plans for follow-up, should be communicated and explained in clear, easy-to-read language, and the relevant documents should be readily accessible to those interested and need to be consulted in advance.

35. CCA instruments are applicable for different types of Bank operations and follow the Environmental and Social Safeguard requirements.

Public Consultation and Participation[xiv]

36. The borrower should ensure that climate change risks and mitigation or adaptation options are meaningfully consulted at the CAS/CPF, project assessment terms of reference and when a full assessment draft is available, in accordance with Bank safeguards for consultation and participation in a manner free of coercion, with prior provision of information in a language an manner accessible to them. All people who are potentially affected by the proposal should be able to understand how climate change has been addressed. Each aspect of the CCA, based on

the principles outlined above from screening through decision-making and plans for follow-up, should be communicated at the earliest possible moment, in accordance with Bank safeguard requirements for consultation and participation, and explained in clear, easy-to-read language. The relevant documents should be readily accessible to potentially affected communities and interested parties.xv

Access to Information[xvi]

37. Full and timely public availability of information, in a universally accessible place and in a language and form understandable to affected people and the public, is essential for meaningful consultation, informed Bank decision making, and the climate sustainability of Bank operations. The communication process should offer information that assures it is available through multiple forms and facilities accessible to the greatest number of people interested or possibly affected by a project, in accordance with Bank Access to Information requirements. Accessibility should respect diversity and dignity of all peoples and use measures as appropriate such as accepted local language, culturally sensitive, and for project populations with disabilities through appropriate means as Braille, tactile communication, large print, audio, plain-language, human-reader, internet technology, and physically accommodating facilities for access to the information.

Due Diligence and Review

38. World Bank's safeguard due diligence begins at the earliest planning stages of discussion with the borrower (CAS/CPS) and review emphasizes climate change impact assessments in the relevant planning process, in addition to safeguard documentation. Due diligence and review requires field visits to climate sensitive areas of proposed project influence (water supply, storm surge, flooding areas, sea-level rise, etc.) and desk reviews of relevant country climate change analysis (such as NAMAS, etc). World Bank confirms:
    - that all key potential direct, indirect, induced and cumulative climate change impacts and risks of a project are identified through the appropriate CCA, including potential transborder risks;
    - that effective measures to apply the mitigation hierarchy[xvii] for the adverse impacts are incorporated into the safeguard plans, project design and implementation;[xviii]
    - that the borrower/client understands World Bank's safeguard policy requirements and has the necessary commitment and capacity to manage climate change impacts and/or risks adequately. For all projects involving significant climate change risks, World Bank requires the borrower/client to engage an independent advisory panel with appropriate skills for country relevant climate change during project preparation and implementation.;
    - that the role of third parties is appropriately defined in the safeguard plans;
    - that consultations with affected people and other stakeholders are conducted in accordance with World Bank's safeguards requirements, including meaningful free, prior and informed consultation of the Indigenous Peoples; and
    - that the affected communities have been informed of and understand their right to access the World Bank's Inspection Panel at the earliest possible stage in the project cycle, as per Bank Safeguard requirements.

Implementation

39. Once a proposal has been implemented, the actual outcomes may be different from those that were identified through the use of CCA. The CCA should therefore identify the impact monitoring, evaluation, management and communication measures that will be carried out for unanticipated impacts after the proposal has been implemented. The CCA will review the adaptive management plan of the project proposal to be able to respond to changing climate conditions[xix].

40. Legal documents bind the client to compliance with World Bank CCA safeguard requirements. World Bank reviews project performance against borrowers' commitments as agreed in the legal documents. Monitoring and supervision of climate change safeguards includes climate change outcome indicators that enable the tracking of safeguard costs and benefits to affected communities and the environment.[xx] World Bank monitors projects on an ongoing basis until a project completion report is issued.

41. If a borrower fails to comply with legal agreements on safeguard requirements, including those described in the safeguard plans and frameworks. If the borrower fails to comply, then World Bank may exercise legal remedies, including suspension, cancellation, or acceleration of maturity, that are available under World Bank legal agreements.

Accountability

42. The borrower establishes and maintains an independent grievance redress mechanism to receive and facilitate resolution of affected peoples' concerns and grievances about the borrower's climate change performance at project level. The grievance redress mechanism operates in accordance to the risks and impacts of the project. It addresses affected people's concerns and complaints promptly, using an understandable and transparent process that is gender responsive, responsive to marginalized, discriminated against and vulnerable groups, culturally appropriate, and readily accessible to all segments of the affected people at no costs and without retribution. The mechanism should not impede access to the country's judicial, administrative, or alternative dispute resolution remedies. The borrower maintains a publicly available registry of complaints received, with identifying information of the complainants removed.

43. The borrower informs project-affected communities of the Inspection Panel and its procedures whereby people adversely affected by World Bank-financed projects can voice, and seek a resolution of their problems, as well as report alleged violations of World Bank's operational policies and procedures.[xxi] Information related to the existence, the role of, and access to the Inspection Panel, including brochures and other resources provided by the Inspection Panel, should be publicly available, in a local language, including by the local grievance mechanism. Affected communities have the right to access the Inspection Pane regardless of whether or not they choose to utilize the borrower's independent grievance redress mechanism.

ANNEX I – Definitions

Anthropogenic

Anthropogenic means caused or produced by human activities. Sources of anthropogenic greenhouse gas emissions include the burning of fossil fuels, deforestation, raising of livestock, use of fertilizers, and so on.

Best Available Technology Assessment (BATA)

Best available technology (or just BAT) is a term applied with regulations on limiting pollutant discharges with regard to the abatement strategy. Similar terms are best available techniques best practicable means or best practicable environmental option.

Biomass

The total mass of living organisms in a given area or volume; recently dead plant material is often included as dead biomass. The quantity of biomass is expressed as a dry weight or as the energy, carbon, or nitrogen content.1 Biomass derived products, by-products, residues and waste occur from agriculture, forestry and related industries as well as the non-fossilized and biodegradable organic fractions of industrial and municipal wastes. Biomass derived products also include gases and liquids recovered from the decomposition of non-fossilized and biodegradable organic material.

Carbon Dioxide (CO2)

Carbon dioxide, also called carbonic acid gas, is a naturally occurring colourless, odorless, incombustible gas formed during respiration, combustion, decomposition of organic substances, and the reaction of acids with carbonates. CO2 is used in carbonated drinks, fire extinguishers, as dry ice for refrigeration. CO2 is present in the Earth's atmosphere at low concentrations and is constantly being removed from the air by its direct absorption into water and by plants through photosynthesis. In turn, it is naturally released into the air by plant and animal respiration, decay of plant and soil organic matter, outgassing from water surfaces. Small amounts of CO2 are also injected directly into the atmosphere by volcanic emissions and through slow geological processes such as the weathering of rock.2 Carbon dioxide acts as a greenhouse gas and anthropogenic sources of CO2 emissions include combustion of fossil fuels and biomass to produce energy, building heating and cooling, land-use changes including deforestation, manufacture of cement and other industrial processes.

Climate

The average pattern of weather usually taken over a 30-year period for a particular region. Climatic elements include precipitation, temperature, humidity, sunshine, wind velocity, phenomena such as fog, frost and hailstorms, and other measures of the weather.

Climate Change

Changes in long-term weather patterns caused by natural phenomena and human activities that alter the chemical composition of the atmosphere through the build-up of greenhouse gases which trap heat and reflect it back to the earth's surface. Also, shorter-term changes in variability and increasing frequency and severity of hydro-meteorological events and shifting seasons. Changes in the geophysical features of the planet, i.e. melting ice caps and glaciers, flows of rivers, changes in ocean currents and upwellings, etc..

Deforestation

Deforestation estimates include all emissions and removals from Forest Conversion that have occurred since January 1st, 1990 (see the definition of Forest Conversion below). The reporting of annual deforestation estimates is mandatory for the first commitment period of the Kyoto Protocol (2008-2012).

Emissions

The release of greenhouse gases into the atmosphere over a specified period of time.

Forests of High Conservation Value

The term “forests of high conservation value” includes areas of socioeconomic and cultural value to local communities and indigenous peoples.

Full Life-cycle Accounting of Environmental and Social Externalities

The full life-cycle social and environmental costs of proposed projects and alternatives (including demand-side management alternatives) allow for the identifications of the options with the greatest overall benefits. For example, for traditional large-scale, fossil fuel investments, these would include: the costs associated with price volatility of fossil fuel, water, and other resource inputs; the opportunity costs of public subsidies; the risks of disruption of energy supplies; the costs and risks of oil spills, toxic contamination, acid rain, air quality health impacts, and other environmental impacts; loss of agricultural and ecosystem productivity, any resettlement or other social impacts on affected communities; the climate impacts of carbon dioxide equivalent emissions; and the opportunity costs of the “lock in” effects of promoting existing technological pathways that may inhibit the development and deployment of superior technologies. Conversely, the intangible public benefits of investments in end-use energy efficiency and on-site and locally distributed renewable energy initiatives may include: increased local employment for women and men, improved security and resiliency of electricity systems, the demonstration effects of bringing new technologies online, and increased innovation and economies of scale to help eliminate the incremental costs of certain renewable technologies over time.

Global Warming Potential (GWP)

A GWP is the time-integrated change in radiative forcing (effectiveness in absorbing outgoing infrared radiation) due to the instantaneous release of 1 kilogram (kg) of the gas expressed relative to the radiative forcing from the release of 1 kg of CO2. The concept of global warming potentials has been developed to allow scientists and policy-makers to compare the ability of each greenhouse gas to trap heat in the atmosphere relative to CO2.

Greenhouse Gases (GHGs)

Greenhouse gases are those gaseous constituents of the atmosphere, both natural and anthropogenic, that absorb and emit radiation at specific wavelengths within the spectrum of infrared radiation emitted by the Earth's surface, the atmosphere and clouds. This property causes the greenhouse effect. Water vapour (H2O), carbon dioxide (CO2), nitrous oxide (N2O), methane (CH4) and ozone (O3) are the primary greenhouse gases in the earth's atmosphere. Moreover, there are a number of entirely human-made greenhouse gases in the atmosphere, such as sulphur hexafluoride (SF6), hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs).1

Greenhouse Gas Accounting/Protocol (GHGA)

The Climate Change Assessment Policy requires the borrowing countries to quantify the direct and indirect emissions associated with the project, both ex ante as part of project appraisal and Alternatives Assessment, and ex post as part of project monitoring. This accounting should be conducted in accordance with internationally recognized methodologies and best practice.[xxii] This information is disclosed in due time for consultation and information purposes, along with the methodologies applied and assumptions used for the supported project or program and the alternatives considered. Costs are

required to be factored into economic and alternatives analyses.

In order to compare the cost effectiveness of its interventions, the Bank requires its borrowing countries to use this accounting to calculate the "cost per avoided ton of CO2eq" and "avoided tons of CO2eq/year" for each proposed activity and alternatives. This tool helps identify interventions that can yield the cheapest, fastest climate mitigation impacts, in the context of achieving its other environmental, social, and poverty alleviation objectives.

Hydrofluorocarbons (HFCs)

Hydrofluorocarbons (HFCs) are a class of synthetic chemical compounds that contain only fluorine, carbon and hydrogen. They are commonly used as replacements for ozone-depleting substances, such as chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs) and halons in various applications including refrigeration, fire-extinguishing, semi-conductor manufacturing and foam blowing. HFCs do not deplete the ozone layer, however they are powerful greenhouse gases.

Integrated Resource Planning

An Integrated Resource Plan is a tool to evaluate and rank all options for delivering utility services—including all end-use efficiency and distributed generation approaches—according to comprehensive assessments of cost and risk. It facilitates transparency and stakeholder engagement around decisions that otherwise are limited to supply options; enables fuller consideration of environmental and social costs; and reduces corruption and subsidies. It also facilitates the use of a utility's lower cost of capital and earnings-on-capital requirements in comparing competitive end-use and distributed efficiency gains with supply options.

To fully capture the benefits of IRP assessments, IRPs is used to 1) identify all end-use delivered services the project will provide; 2) identify the costs of improving the end-use efficiencies; 3) incorporate all end-use efficiency options into the project that have a delivered cost up to the cost of expanding new generating supply (including transmission and distribution costs and risk-adjusted costs for externalities like emissions and price volatility of fuels and water requirements); and 4) develop programs to use their low-cost capital to finance these efficiency gains for their customers.

The Bank requires from its borrowers to develop integrated resource plans when considering utility supply expansion projects, and use them to design interventions that promote the optimal resource allocation to meet demand. The Bank will not support energy or water supply expansion projects unless it is shown through an IRP process to be the most advantageous service delivery option.[xxiii]

Inventory

An accounting of the amount of greenhouse gases emitted to or removed from the atmosphere over a specific period of time (for example, one year).

Land Use, Land Use Change and Forestry (LULUCF)

A greenhouse gas inventory sector that covers emissions and removals of greenhouse gases resulting from direct human-induced land use, land-use change and forestry activities including wildfires, controlled burning, and land conversion.

Low-Carbon Development Strategies

The concept of low carbon development has its roots in the UNFCCC adopted in Rio in 1992. In the context of this convention, low carbon development is now generally expressed using the term low-emission development strategies (LEDS - also known as low-carbon development strategies, or low-carbon growth plans). Though no formally agreed definition exists, LEDS are generally used to describe forward-looking national economic development plans or strategies that encompass low-emission and/or climate-resilient economic growth.[xxiv]

Methane (CH4)

Methane is a colorless, odorless, flammable gas that is the simplest hydrocarbon and is the major constituent of natural gas. Like carbon dioxide, methane is exchanged naturally between the Earth's surface and the atmosphere, however, methane is removed from the atmosphere primarily through chemical processes involving the chemical hydroxyl radical, OH.2 These chemical interactions finally produce water and carbon dioxide. A small amount of methane is also absorbed directly by soils. Methane is present in the Earth's atmosphere at low concentrations and acts as a greenhouse gas. Methane is produced naturally during the decomposition of plant or organic matter in the absence of oxygen, as well as released from wetlands (including rice paddies), through the digestive processes of certain insects and ruminant animals such as termites, sheep and cattle. Methane is also released from industrial processes, fossil fuel extraction, coal mines, incomplete fossil fuel combustion, and garbage decomposition in landfills.

National Action Plans to Reduce Short-lived Climate Pollutants

Under the aegis of the Climate and Clean Air Coalition (CCAC), developing countries are developing national action plans to reduce the impacts of short-lived climate pollutants.[xxv] These action plans focus on five strategic areas: (1) reducing black carbon emissions from diesel vehicles and engines; (2) reducing black carbon and other pollutants from brick production; (3) reducing SLCPs from municipal solid waste; (4) promoting HFC alternatives and standards; and (5) reducing SLCP from oil and natural gas production.[xxvi] As a partner in the Coalition, the World Bank promotes the development of these plans, and integrates them into its investment decision-making to ensure that activities are consistent with the national SLCP reduction priorities.

National Adaptation Plans (NAPs);

The national adaptation plan (NAP) process was established under the Cancun Adaptation Framework (CAF). It enables Parties to formulate and implement national adaptation plans (NAPs) as a means of identifying medium- and long-term adaptation needs and developing and implementing strategies and programs to address those needs. It is a continuous, progressive and iterative process which follows a country-driven, gender-sensitive, participatory and fully transparent approach.[xxvii]

The objectives of the NAP process are:

- To reduce vulnerability to the impacts of climate change, by building adaptive capacity and resilience;
- To facilitate the integration of climate change adaptation, in a coherent manner, into relevant new and existing policies, programs and activities, in particular development planning processes and strategies, within all relevant sectors and at different levels, as appropriate

National Appropriate Mitigation Measures (NAMAs);

Nationally appropriate mitigation actions (NAMAs) are climate change mitigation measures proposed by developing country governments to reduce emissions below 2020 business-as-usual levels and to contribute to domestic sustainable development. NAMAs can take the form of regulations, standards, programs, policies or financial incentives. However, at the United Nations Framework Convention on Climate Change (UNFCCC) level, many aspects around the development, implementation and support of NAMAs are still undefined. The term was coined in the Bali Action Plan of 2007, and later, in 2009 in Copenhagen, developing countries submitted NAMAs to the UNFCCC. The NAMA concept is still evolving and will be shaped through learning-by-doing efforts now underway in developing countries.[xxviii]

Policy:

Policies and procedures cover all aspects of Bank loan and grant making operations, helping to ensure consistent and open delivery of World Bank loans, grants and other financial programs and services.

Program:

A plan of action aimed at accomplishing a clear business objective, with details on what work is to be done, by whom, when, and what means or resources will be used.

Project:
The World Bank lends money to low and middle-income countries to support development and change. Development projects are implemented by borrowing countries following certain rules and procedures to guarantee that the money reaches its intended target.

ANNEX II: Exclusion List

WORLD BANK does not knowingly finance, directly or indirectly, operations involving the following:

a. Financing of coal-based power stations.
b. Financing of projects that produce any hydrofluorocarbons.
c. The production of or trade in any product or activity sanctioned under host country (i.e. national) laws or regulations, or international conventions and agreements, or subject to international phase out or bans, such as:
    (i) Production of or trade in products containing PCBs.[xxix]
    (ii) Production of or trade in pharmaceuticals, pesticides/herbicides and other hazardous substances subject to international phase-outs or bans.[xxx]
    (iii) Production of or trade in ozone depleting substances subject to international phase out.[xxxi]
    (iv) Trade in wildlife or production of or trade in wildlife products regulated under CITES.[xxxii]
d. Shipment of oil or other hazardous substances in tankers which do not comply with IMO requirements.[xxxiii]
e. Production, trade, storage or transport of significant volumes of hazardous chemicals (including gasoline, kerosene, and other petroleum products)
f. Nuclear power stations and other nuclear reactors, including the dismantling or decommissioning of such power stations or reactors (except research installations for the production and conversion of fissionable and fertile materials, whose maximum power does not exceed 1 kilowatt continuous thermal load).
g. Installations designed for the production or enrichment of nuclear fuels, the reprocessing, storage or final disposal of irradiated nuclear fuels, or for the storage, disposal or processing of radioactive waste.
h. Financing or policy reform, including for production and trade in wood or other forestry products that promotes the conversion, deforestation or degradation of natural forests or forests of high conservation value, inter alia, through industrial logging, conversion of natural forests to tree plantations or other large-scale agricultural conversion. Forests of high conservation value include areas of socioeconomic and cultural value to local communities and indigenous peoples.
i. Purchase of logging equipment for use in primary tropical moist forest, [including investment in infrastructure for logging].
j. Production or trade in wood or other forestry products other than from sustainably managed forests. This includes palm oil, other than palm oil certified as sustainable under guidelines of the Roundtable on Sustainable Palm Oil (RSPO).
k. Use of natural tropical forest or high conservation value forest for the production of pulp and paper.
l. Production or activities involving harmful or exploitative forms of forced labor/harmful child labor

*Over a minimum threshold of $1 million of Bank Group finance per transaction or related transactions. References to the World Bank are understood herein to include all members of the World Bank Group: the International Bank for Reconstruction and Development (IBRD); the International Finance Corporation (IFC); the International Development Association (IDA); the International Centre for Settlement of Investment Disputes (ICSID); and the Multilateral Investment Guarantee Agency (MIGA).

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i a). from an operation perspective meaning does climate change reduce the capacity/viability of the project; b). from the socio-environmental perspective ensuring that climate change impacts have been considered by the CCA safeguard implementation; c). from the country carbon perspective meaning does the project add or decrease to a national GHG budget.

ii The panel advises the borrower specifically on the following aspects: (a) the terms of reference for the CCA, (b) key issues and methods for preparing the CCA, (c) recommendations and findings of the CCA, (d) implementation of the CCA's recommendations, and (e) development of climate management capacity. Panelist independence must be based on no conflict of interest regarding past, present of future contractual relationships with the Bank or the client (i.e. For example, they must be free of contracts from the Bank during the past five years and may not engage in contracts with the Bank during the next five years).

iii Each Management/Action Plan needs to contain at least the general components that constitute such a plan, i.e. action steps, a time frame, resources, responsible staff and means of evaluation.

iv Bilateral and other trust funds need to be utilized.

v International agreements; National laws.

vi Visit Definitions Annex.

vii http://www.ipcc.ch/publications_and_data/ar4/wg1/en/ch2s2-10.html

viii 1. Canadian Environmental Assessment Agency, "Incorporating Climate Change Considerations in Environmental Assessment: General Guidance for Practitioners," prepared by The Federal- Provincial-Territorial Committee on Climate Change and Environmental Assessment, 2003.

2. Institute of Environmental Management & Assessment, "Principles Series: Climate Change Adaptation & EIA," and "Principles Series: Climate Change Mitigation & EIA," 2010.

3. Netherlands Commission for Environmental Assessment, "NCEA's Recommendations on Climate Change in Environmental Assessment," 2007.

4. Nova Scotia Environment (Canada), "Guide to Considering Climate Change in Environmental Assessments in Nova Scotia," and "Guide to Considering Climate Change in Project Development in Nova Scotia," 2011.

5. OECD Development Assistance Committee (DAC), "Strategic Environmental Assessment and Adaptation to Climate Change," 2010.

6. Scottish Government, Environmental Assessment Team, "Consideration of Climate Factors within Strategic Environmental Assessment (SEA)," 2010.

ix Project is sensitive to climate variability, or adaptive capacity of community or ecosystem is sensitive ti impacts of project.

x The global warming potential (GWP) is a well-established and well-defined physical metric that compares the integrated radiative forcing of two greenhouse gases over some chosen time period resulting from pulse emissions of an equal mass. Radiative forcing itself is a fundamental physical parameter that quantifies a primary way in which human activity causes climate to change. The numerical value of the GWP can depend markedly on the choice of time horizon. CCA requires the borrowing countries to have developed GWP metrics for proposed projects and takes into account the results at hand.

xi EBRD supports such energy efficiency efforts through its Sustainable Energy Initiative.
http://www.ebrd.com/downloads/research/factsheets/industriale.pdf

xii In Bolivia, for example, at present three mechanisms are in place: 1. A joint mechanisms that deals with integrated forest management and resources of the Mother Earth; 2. A Mitigation Mechanism "para vivir bien" focused on energy patterns, economy/production/industry and reduction of GHG emissions, and climate mitigation related to private and public transport; and 3. An Adaptation Mechanisms "para vivir bien" focused on access to water/ watershed management, alternative food production an risk prevention (at present, a National Adaptation Strategy is in preparation focused on enhancing "resilience of the life systems" in Bolivia.

xiii OP 4.01, Environmental Assessment, para. 3.

xiv For more details, please refer to WB Safeguards on Consultation and Particiaption.

xv IAIA's Public Participation Best Practice Principles

xvi For a further discussion of the Bank's disclosure procedures, see The World Bank Policy on Access to Information.

xvii Enable early identification of potential climate change risks; examine project alternatives; identify ways of improving project selection, siting, planning, design, and implementation by a rigorous application of the mitigation hierarchy -- preventing, or when prevention is impossible, minimizing, and mitigating adverse climate impacts and enhancing positive impacts; The Bank favors preventive measures over mitigatory measures.

xviii The Bank assesses proposed mitigation measures on the basis of transparent and fully described estimation of the residual risks, which compares the likelihood, affected population and magnitude of the risk with the likelihood and effectiveness of the remedy, based on evidence from the sector or the borrower's track record.

xix IAIA's EIA Follow-Up International Best Practice Principles

xx For more on project performance management system, see Appendix A, Annex E, para. 16.

xxi See BP 17.55 and 1996 Clarification, and 1999 Clarification on the operational procedures for the Inspection Panel.

xxii See e.g., IFC, 2012. Performance Standard 3, para. 9. For example, "Measurement, Reporting and Verification" (MRV) developed for REDD+ (Reducing Emissions from Deforestation and Degradation) may serve as a useful model for carbon monitoring and accounting. See, e.g., GOFC-GOLD, 2012, A sourcebook of methods and procedures for monitoring and reporting anthropogenic greenhouse gas emissions and removals associated with deforestation, gains and losses of carbon stocks in forests remaining forests, and forestation. GOFC-GOLD Report version COP18-1, (GOFC-GOLD Land Cover Project Office, Wageningen University, The Netherlands). http://www.gofcgold.wur.nl/redd/sourcebook/GOFC-GOLD_Sourcebook.pdf

xxiii http://www.internationalrivers.org/files/attached-files/intlrivers_irp.pdf

xxiv (OECD, IEA 2010).

xxv http://www.unep.org/ccac/Actions/tabid/102153/Default.aspx
xxvi Independent Evaluation Group, 2009. Climate Change and the World Bank Group. Phase I: An Evaluation of World Bank Win-Win Energy Policy Reforms. Washington, DC: World Bank.
xxvii http://unfccc.int/adaptation/items/5852.php
xxviii Examples, Columbia: http://ccap.org/programs/transit-oriented-development-nama-in-colombia/
Chile: http://ccap.org/programs/industrial-and-municipal-waste-nama-in-chile/
Dominica Republic: http://ccap.org/programs/tourism-nama-in-the-dominican-republic/
xxix PCBs: Polychlorinated biphenyls—a group of highly toxic chemicals. PCBs are likely to be found in oil-filled electrical transformers, capacitors and switchgear dating from 1950-1985.
xxx Reference documents are EU Regulation (EEC) No 2455/92 Concerning the Export and Import of Certain Dangerous Chemicals, as amended; UN Consolidated List of Products whose Consumption and/or Sale have been Banned, Withdrawn, Severely Restricted or not Approved by Governments; Convention on the Prior Informed Consent Procedures for Certain Hazardous Chemicals and Pesticides in International Trade (Rotterdam Convention); Stockholm Convention on Persistent Organic Pollutants; WHO Classification of Pesticides by Hazard.
xxxi Ozone Depleting Substances (ODSs): Chemical compounds which react with and deplete stratospheric ozone, resulting in the widely publicized 'ozone holes'. The Montreal Protocol lists ODSs and their target reduction and phase out dates. A list of the chemical compounds regulated by the Montreal Protocol, which includes aerosols, refrigerants, foam blowing agents, solvents, and fire protection agents, together with details of signatory countries and phase out target dates, is available from the EBRD.
xxxii CITES: Convention on International Trade in Endangered Species of Wild Fauna and Flora. A list of CITES listed species is available from the EBRD.
xxxiii This includes: tankers which do not have all required MARPOL SOLAS certificates (including, without limitation, ISM Code compliance), tankers blacklisted by the European Union or banned by the Paris Memorandum of Understanding on Port State Control (Paris MOU) and tankers due for phase out under MARPOL regulation 13G. No single hull tanker over 25 years old should be used.