

Statement by Egyptian civil society organizations on the World Bank's proposed draft Safeguard Policies

Introduction:

The World Bank is currently reviewing its Safeguard policies that govern the projects and programs it finances, and that are supposed to ensure the sustainability of these projects and hold the Bank accountable to its true mission of development through establishing social, environmental and health standards.

This periodic review comes in the midst of repeated demands by civil society organizations, rights-based groups, and labor unions around the world to review the policies that were previously implemented to be better aligned with human rights standards. It also comes on the heels of the Bank's commitment to achieving its twin goals of ending extreme poverty and promoting shared prosperity.

The first draft of the Safeguard policies that has been released for discussion and inputs has, however, come as a huge disappointment and shock, and as the detailed analysis by Egyptian civil society organizations of these proposed policies will show below, it cannot be relied on to achieve effective protection of people's economic, social and environmental rights.

The proposed draft is based on the same economic model adopted by the Bank for decades that sees growth as the only way to measure and achieve economic progress, trumping other necessary requirements for ending poverty - the Bank's proclaimed goal. The draft fails to protect the rights of workers, women, people displaced from their lands, and indigenous peoples around the world.

Despite the many studies by the Bank confirming that economic justice is necessary for economic growth and development, the Bank chose to limit the scope of its intervention to ending extreme poverty, not even overall poverty, ignoring the calls of civil society and human rights organizations for economic justice. The newly proposed safeguard policies came as a hindrance to achieving this goal, even with its limitations, raising several questions about the compatibility between the role of the World Bank as a key lender in financing development projects, and the development policies used by international institutions such as the United Nations, the Food and Agriculture Organization (FAO), and the International Labor Organization (ILO) that play a big role in designing the development policies of their member states.

Civil society organizations around the world and in Egypt protested the process of the review and update of the safeguard policies so far, which has lacked inclusiveness and transparency. More importantly, the review process failed to include the inputs of civil society organizations, independent experts, indigenous peoples, labor unions and affected communities in an effective and meaningful way.

Overall, the proposed draft suffers from the following weaknesses:

- (1) The dependence on the national laws and systems of its member countries in issues related to economic and social rights in its projects. This allows the Bank to benefit from the absence of these laws in certain countries, and makes it no longer a lending institution that is concerned with development but a pure financial institution.
- (2) The use of terminologies that do not adhere to international standards and conventions and its tendency to weaken rights language in the relevant draft policies. For example, and not limited to, the use of the concept of redress or compensation instead of reparation of harms, and involuntary resettlement instead of forced eviction.
- (3) The absence of any mechanism to ensure the effective implementation of the proposed policies in the draft.
- (4) The absence of any clear recourse in case of violation by the borrower of these policies, or even any mention of the possibility of the “borrower being in violation of its commitments.”

Egyptian civil society organizations participated in several efforts to pressure the Bank to amend the draft during the early stages of the process. They submitted a letter expressing their refusal of the proposed draft that was to be discussed by the Bank’s board of directors at the end of June 2014; and worked closely with different regional working groups particularly a coalition of CSOs from Asia in October 2014. Together with CSOs from around the world, they also submitted a statement clearly highlighting their critiques of the proposed draft to the World Bank President Kim in October 2014; and drafted and delivered a strong statement during a consultation session that took place at the World Bank’s headquarters in Washington, DC during the first week of October 2014.

Consultations around the proposed draft continue to take place, and Egyptian CSOs were invited to attend a local consultation session in Cairo in October, 2014. Invited CSOs worked hard to prepare for the consultation and reached out to a large number of stakeholders including workers and citizens. The main criticism by CSOs of the consultation session was the absence of any firm response to the points raised by the CSO and stakeholder attendees. Most of the Bank employees left the consultation session before it ended, with some employees leaving less than two hours after the start of the session, which the attendees considered insulting.

Moving forward and in the hope of creating better processes for engagement, the CSOs that attended the consultations in Egypt have identified the following three recommendations that they think the Bank should work toward achieving for more effective consultations:

- (1) To dedicate enough time during the consultations to discuss every policy separately with the relevant group of people.
- (2) To design independent consultation sessions for each country, and not lump several countries in one consultation.
- (3) For the Bank team that worked on the draft policies to be present at the consultations because they are better equipped to present the Bank’s position in an informed manner and to facilitate a meaningful and effective discussion around the different material and information.

Following is a detailed critique by CSOs of the proposed draft safeguard policies:

Environmental and Social Standard 1: Assessment and Management of Environmental and Social Risks and Impacts

The process of environmental impact assessment should be based on a number of standards and principles:

- Assessments must be conducted during all stages of the project cycle including at early stages before implementation, during project implementation and after project completion.
- Civil society should play a meaningful role in the process of environmental impact assessment that extends beyond consultations only, and includes the preparation of shadow reports relevant to the environmental assessment studies.
- CSOs should also be able to monitor the adherence in implementation to the environmental impact assessment studies and hold relevant parties accountable.
- Project information must be available and accessible before implementation of the project and before the approval of the loan.
- The process of environmental impact assessment must be an institutional effort with a clear and specific process, conducted by independent organizations subject to monitoring and accountability by publicly elected institutions and CSOs.
- The environmental impact assessment study should be discussed by publicly elected institutions and approved by elected boards according to standards of transparency and integrity.

With respect to food security:

The issue of food security should be taken into consideration when designing projects and also should be one of the Bank's policy priorities.

Given the scarcity of land and water, the Bank should not build projects on agricultural lands, especially those that are close to water sources. Such projects erode the fertility of those lands and threaten the food security of the people who live off of them.

Loan agreements between the Bank and governments should explicitly include appropriate legal recourse in case of any disputes or conflict between the two contracting parties or violation of environmental impact assessment studies or safeguard policies. These agreements should also allow civil society organizations legal recourse in case of violations related to project implementation.

Environmental and Social Standard 2: Labor and Working Conditions:

The proposed standard related to the labor rights will not have any impact in protecting the rights of workers: after excluding third-party contractors and civil service employees, the standard only applies to

a small group of people who are employed by projects financed directly by the Bank. In addition to that, and contrary to other development institutions, the proposed policies fail to adhere to or reference the ILO's basic labor standards and conventions, which should constitute the cornerstone for any credible labor rights policy. Through limiting the scope of the groups to which the policy is applied, the Bank will allow for unsafe working conditions, child labor, non-payment of wages, and the prevention of freedom of association to continue to take place.

With respect to implementation, the standard should include clear language on the inclusion of various types of contractors for Bank-financed projects among those that the policy is applied to, including permanent and seasonal contractors, direct hires, and sub-contractors, where many labor rights violations take place. The draft should explicitly require the full disclosure of the rights of workers in a project by posting an information leaflet or banner or at the project site.

We have several objections to specific articles of the standard. The proposed draft failed in addressing the rights of workers in organizing and collective bargaining: Article 11 of the standard does not refer to the international conventions that uphold the rights of workers in forming and joining unions. In our case in Egypt, the government can use this as a tool to fight against our demands for labor rights, especially since they have yet to recognize independent unions, and also given their clear attempts to avoid the adoption of a freedom of association law ever since the military council ruling the country issued a constitutional declaration in 2011 regarding this law. The declaration was based on Convention 87 of the ILO on the Freedom of Association and the Right to Organize that was adopted by the ILO general assembly in July 1948 and which Egypt has signed on to.

It is important to ensure the rights of public-sector and independent unions and all forms of labor organizing to obtain the proper information needed to negotiate in a meaningful and appropriate manner.

The proposed draft also defers to country laws and systems for many of the rights related to labor, and lacks any clear language on the need for projects to adhere to minimum wage standards for workers and their rights to benefits and pensions.

Articles 12, 13, and 14 do not make clear the redress mechanism that the government is required to provide to workers. The language is very flexible and subject to multiple possible interpretations, which allows the government to create a redress mechanism that does not advance the rights of workers.

In Article 18, "the use of forced labor should be prohibited" should replace "forced labor will not be used."

The draft document uses the term "notice of dismissal" instead of "end of contract," which is a controversial point that has serious implications because it gives the lender or the owner of the project the full right to the arbitrary termination or the dismissal of workers' rights at the completion of the project. The term "end of contract" must be used, and the standard should clearly state all the rights of workers at the end of the project.

The proposed draft also uses the term “compensation” instead of “reparation of harms,” which is problematic. It is necessary to repair any harms incurred by workers and not only compensate them for the harms they suffered.

Article 21 is very broad in scope, and the lack of clarity in its language could lead to a failure in protecting workers’ rights in a significant way. It is necessary to adopt clear standards that respect human rights and that all Bank projects should comply with.

With respect to vulnerable groups, the stated goals relate only to the protection of disadvantaged groups like women and children and should include the protection of sexual and gender minorities and persons with disabilities.

Articles 15, 16, and 17 do not define what hazardous work activities and projects are. In Egypt, mining and quarry operations such as those in Minya and the village of Al-Sof in South Giza employ children under the age of 15, and in some parts of the country, children make up a large percentage of construction and wood workers.

The Bank should clearly define hazardous work activities and projects, and ensure that the relevant Bank staff in Egypt monitor these projects to ensure that no children are being employed. In the case where child labor is being used in these projects, employed children should be compensated according to minimum wage standards for child labor.

Language used in Article 15 conflicts with language used in Article 16. Article 15 states that: “Labor management procedures will specify a minimum age for employment in connection with the project, as determined by national law.” Article 16 states that: “Children under the age of 18 may not be employed in connection with the project in a manner that is likely to be hazardous or interfere with the child’s education or be harmful to the child’s development.”

Article 17 which states: “Where children under the age of 18 may be employed in connection with a the project, an appropriate risk assessment will be conducted...” is problematic and should instead state that “Children under the age of 18 should not be employed in Bank projects in all hazardous work as determined by the ILO’s Convention on Worst Forms of Child Labor.” The convention, which is the primary reference on this issue, identified 44 such jobs.

In case of employment of children between the ages of 15 and 18, this should be done according to the hours and conditions of child labor determined in the ILO’s Convention on the Minimum Age for Admission to Employment, whereby children between the ages of 15 and 18 work no more than 6 hours per day, including an hour of rest, and where they are provided with proper meals as determined by the ILO convention and also the UN Convention on the Rights of the Child. The standard should also prohibit the employment of children under the age of 15 under any circumstances, and include an article that specifically prohibits the employment of women and children between 7pm at night and 7 am in the morning.

Environmental and Social Standard 3: Resource Efficiency and Pollution Prevention

Environmental and Social Standard 4: Community Health and Safety:

Environmental and Social Standard 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement:

The Bank attempts to define “forced eviction” in footnote 5, but it failed to include a stipulation on prior consultations. As such, it would be understood that if prior consultations did not take place according to the Bank’s definition, evictions would not be considered forced evictions as long as there was advance notice, opportunities to lodge grievances, and excessive force was not used.

The third point under objectives mentions: “(a) providing timely compensation for loss of assets at replacement cost.” We have reservations on the use of the term “compensation” that is regularly used by the Bank, and we prefer the term “reparation of harms” which is broader in scope and means returning something to its original status as much as possible. The term “compensation” is also used in footnote 6 defining the term “replacement cost” which should include an account of losses suffered by affected communities.

Point (b) under the same objective mentions:” ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected.” There is no clear definition of what is considered appropriate in terms of disclosure of information and whether it is the responsibility of the Bank or the borrower to ensure the disclosure of information. There is also no mention of frequency or timing of disclosure.

Article 5 states that this ESS does not apply to “regulation or planning of natural resources or land use on a regional or national level to promote sustainability.” However, in the case of such activity, “a social, legal and institutional assessment may be required in accordance with ESS1, to identify potential risks and impacts, together with appropriate design alternatives or measures to minimize and mitigate adverse economic and social impacts, especially those that affect poor and vulnerable groups.” This loophole allows the borrowing governments to potentially evade the implementation of this standard by integrating projects within already existing regional plans for example. Moreover, the article does not clarify whose responsibility it is to design alternatives or appropriate measures.

Article 9 which states that “Compensation standards for categories of land and fixed assets will be disclosed and applied consistently...in accordance with transparent procedures” does not clarify appropriate timing for the disclosure of compensation standards, and whether it will occur during the appraisal phase or during project implementation or after project completion.

Article 10 states: “In the case of affected persons under paragraph 6 **Error! Reference source not found.**, resettlement assistance will be provided in lieu of compensation for land, as described in paragraphs **Error! Reference source not found.** and **Error! Reference source not found.****Error! Reference source not found.**” Affected persons under paragraph 6 (c) are those who have no recognizable legal right or claim to the land or assets they occupy or use, and the suggested resettlement assistance that

they will be provided with includes adequate housing with security of tenure, assistance with transportation and livelihood costs, with no compensation for the land which provided the source of their livelihoods and no measure of the cost of losses. Also, there is no mention as to whether their livelihoods will be improved as a result.

Article 11 explains the difference between resettlement and compensation with respect to affected persons. The borrower will not begin implementation of the project before providing compensation to affected individuals as defined under 6 (a). With respect to affected individuals as defined under 6 (c), it would depend on the borrowing government's capacity.

Article 12 does not give importance to communities' approval of projects and of the size of compensation. So, if there is prior approval of the project by the Bank, borrowing governments can deposit compensation funds that were not approved by the communities into an escrow account and proceed with the project. After implementation begins, affected communities will have no choice but to accept the compensations they previously rejected.

Article 13 states: "Compensation may also be paid in installments ...and provision of remaining compensation funds will be assured through an escrow account (established and fully funded prior to displacement) or comparable measures." The article discusses the possibility of paying the compensation in installments with the initial installment to be paid prior to dispossession and to be at least sufficient to meet immediate relocation expenses, with no discussion of how the rest of the funds will be paid, and of a timeline to do so, and whether it will be enough to cover all the livelihood needs of affected individuals.

Footnote 16 under article 14 mentions that "the consultation process should ensure that women's perspectives are obtained and their interests factored into all aspects of resettlement planning and implementation etc." This should not be limited to women only but should also include the perspectives of vulnerable and marginalized groups such as persons with disabilities if they are among the affected communities.

Article 16 which states that "where land acquisition or restrictions on land use are unavoidable...Information regarding the cut-off date will be well documented and disseminated throughout the project area," does not specify the start date for dissemination of information.

Article 17 (a) lacks clarity on what constitutes "projects with minor land acquisition." What are the standards that we can use to measure this? Determining "eligibility criteria for affected persons" will be left to the borrowing government which will look to its national laws for guidance. These laws in their turn can fail to protect those with historic rights to the land such as indigenous peoples, whose rights to their lands are not based on written legal documentation.

Article 17 (b) and (c) does not specify what "additional measures" entails.

Article 19 states that the borrowing government will "establish procedures to monitor and evaluate the implementation of the plan." Shifting this responsibility to the government blurs the role of the Bank in

the monitoring process and in helping establish the standards for it. As such, it is also not clear whose responsibility it is to ensure that consultations with affected communities take place during the monitoring phase, and when affected communities will be informed of the results of the evaluation process. Similarly, article 20 places the responsibility of audit of the resettlement plan and the effectiveness of its mitigation measures on the government, making the Bank simply a lending institution with no responsibilities.

Article 26 states the following:” The Borrower is not required to compensate or assist those who encroach on the project area after the cut-off date for eligibility, provided the cut-off date has been clearly established and made public.” The article does not define how the cut-off date will be made public or suggest appropriate methods to do so, specifically in the area surrounding the project site.

Environmental and Social Standard 7: Indigenous Peoples

Article 5 states that “there is no universally accepted definition of Indigenous Peoples,” and “ the Borrower may agree with the Bank on an alternative terminology for the Indigenous Peoples as appropriate to the circumstances of the Borrower.”

The Bank used the fact that there is no one definition of Indigenous Peoples, and gave the borrowing governments the freedom to agree on an alternative term appropriate to the borrowing government. However, the absence of consensus on a definition of Indigenous Peoples does not preclude that there is agreement on a number of standards that should be adhered to and that are outlined in Convention 169 of the ILO on Indigenous and Tribal Peoples. As the Bank considers itself a leader in the field of development, it should work on adopting the standards related to Indigenous Peoples found in international conventions, rather than highlight the fact that there is disagreement on the terminology. In addition, the Bank should adopt minimum standards to define the term Indigenous Peoples instead of leaving it open to a negotiation process between the Bank and every borrower government.

Article 6 (a) lists the following as one characteristic of Indigenous Peoples: “Self-identification as members of a distinct indigenous social and cultural group and recognition of this identity by others.” In countries with a nationalistic identity that do not recognize other nationalities or tolerate cultural diversity, Indigenous Peoples may not be recognized as a separate identity group, which allows these governments to avoid implementation of this standard.

In continuing to defer more powers to borrowing governments, the Bank is absolving them from their commitments to implement this standard. According to article 9, the borrower can avoid the implementation of the Indigenous Peoples standard “where the identification of culturally-distinct groups as envisioned in this ESS is inconsistent with the provisions of the national constitution.” This means that a country can continue to not recognize Indigenous Peoples groups even when they are categorized as such according to international convention standards describing Indigenous Peoples or even according to the Bank’s own definition.

Despite articles 19-21 and 24-27 requiring borrower governments to obtain Free Prior and Informed Consent (FPIC) of affected Indigenous Peoples, article 20 (d) weakens this requirement by stating that

“FPIC does not require unanimity and may be achieved even when individuals or groups within or among affected Indigenous Peoples explicitly disagree.” If so, then what is the importance of obtaining FPIC, and how will the Bank measure the rates of approval and disapproval of among Indigenous individuals and groups?

Environmental and Social Standard 10: Information Disclosure and Stakeholder Engagement

We welcome the Bank’s efforts to require borrowing governments to engage stakeholders throughout the project cycle. However, we would like to present the following comments and asks with the goal of making stakeholder engagement more meaningful and effective.

Transparency and Access to Information:

In principle, the standard does not mandate disclosure of information or transparency, and there are multiple examples that demonstrate this.

In article 6, instead of “Borrowers will engage with stakeholders by providing them with access to timely, relevant, understandable and accessible information,” it should state that “Borrowers are mandated to provide all available information on a project.”

Article 9 which states that “for all projects, Borrowers will consult with stakeholders” does not include strong language that mandates the borrower or the Bank to conduct consultations.

Under “Engagement during Project Preparation,” article 12 states that “the Borrower will identify the various individuals or groups who are affected by the project,” without reference to an independent study prepared by an independent party that would identify the harms associated with and the people affected by the project.

Under “Stakeholder Engagement Plan,” article 14 fails to include strong language that mandates the government to develop and implement such a plan.

Stakeholder Identification:

According to this draft policy, the borrowing government is responsible for identifying stakeholders, including affected communities (article 12) and community representatives such as civil society organizations (article 16), but with no mechanisms in place to ensure a fair process. In many countries, governments create civil society organizations that are in fact affiliated with the government in order to satisfy the requirement of engaging stakeholders. In addition, in fragile and conflict situations, there should be an engagement approach that includes everyone and not only those who are supported by the ruling authority. Also, many governments around the world fail to include vulnerable groups including women, children, persons with disabilities and sexual and gender minorities.

- **Clear standards must be identified for identifying different stakeholders. The Bank should participate in the identification of the different groups that should be represented in the advisory group in an unbiased manner.** This advisory group should include rights-based

organizations that work on specific issues relevant to a particular project. **The advisory group would then work with the borrowing government on:**

- Identifying the different individuals, organizations and groups that should be invited;
- Developing a Stakeholder Engagement Plan (SEP);
- Deciding the design and location of each consultation session;
- Identifying the material to be translated into the local languages;
- Revising the SEP when needed.

Process of Development of a Stakeholder Engagement Plan (SEP):

- The borrowing government is mandated to develop a Stakeholder Engagement Plan (SEP) that describes the timing and methods of engaging communities affected by projects and other stakeholders throughout the project life cycle (articles 14 and 17). **Given that the goal of the SEP is to ensure the constructive engagement of stakeholders with governments, these same stakeholders should participate in the plan’s design (see above section on the role of the advisory group).**
- There is no clear language in the draft on when the SEP should be disclosed (article 14). As mentioned earlier, the advisory group that represents various stakeholders should participate with the borrowing government in the development of the plan. **The draft of the SEP should then be disclosed and translated into the local languages for discussion with different stakeholders before submitting a final version to the Bank. The process of disclosure, consultation and submission of the SEP should be completed before consultations on the Environmental and Social Impact Assessment (ESIA) take place, because the ESIA will be based on the rules set forth and agreed upon in the SEP.**
- **An action plan must be developed to assess the capacity of stakeholders and fill in gaps.** Based on the action plan, investments in capacity building, especially for communities that are likely to be affected by a project, can be made before project approval. This action plan should be included in the SEP and the Environmental and Social Management Plan (ESMP).
- According to the draft framework, the SEP should include “differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable” (article 16). This important concept should be explained in a broader manner (perhaps in the directive related to this standard). **Specific language should be added that includes minimum requirements such as facilitating the access of different affected communities to consultation sites, and the development of different communication tools that are appropriate for people of different ages and education levels.**

The scope of SEP:

- **With respect to projects that are regional or national in scope** (article 17), there is no clear language requiring the development of a national or regional SEP. SEPs should be required for sub-projects, but in the absence of national participation around the impacts of a full-scale national project, the communities that are consulted on the sub-projects are not consulted on the cumulative impacts of the project. In addition, some communities may be affected by the cumulative impacts of the national project and not at the sub-project level. **Different SEPs should be developed for projects at the national or regional level.**

Changes in risks and identified communities:

- “If there are material changes to the project that result in additional risks and impacts of concern to the project-affected communities,” the SEP requires the borrower to “inform them how these risks and impacts are being addressed” (article 22). If the SEP was developed based on the risks that were originally assessed and the affected communities originally identified, **the SEP should be re-assessed and revised to reflect any new changes (new risks and new affected communities), and additional consultations should be held because significant changes such as these could render the original SEP ineffective. Requiring the government to announce these changes is neither realistic nor sufficient.**

Consultations:

- The language related to the standards to ensure an effective consultation process (article 19) lacks clarity and is subject to interpretation. For example, with respect to prior disclosure and dissemination of relevant information, **the standard should specify when information should be disclosed (at least two weeks prior to consultations).**
- There is no clear definition of “relevant material” that should be translated into local languages and disclosed prior to consultations. Although all documents related to the subject of the consultation should be disclosed, we understand that it is difficult to translate all documents. **The original team that developed the SEP with the borrowing government should decide upon the documents to be translated and the languages that they should be translated into. All documents related to the subject of the consultation should be considered relevant.**
- There is no language in the framework that clarifies where consultations should take place. **Consultations should take place in locations that are culturally-appropriate to the participants, and within reasonable distance from various stakeholders, accessible to persons with disabilities, and accessible by public transport.**
- The draft framework states that feedback should be incorporated in an appropriate manner (article 19). **The borrower should clearly demonstrate how feedback was incorporated or not before taking relevant decisions.** Documented evidence of consultations and active participation must be made available. The borrower should provide a revised version of the

discussed document to those who participated in the consultations at least 30 days before the approval of the final version.

Engagement during Project Implementation:

- Article 21 of this proposed standard requires the borrower to “provide ongoing information to the project-affected communities” and to “receive feedback on the effectiveness of the project and the implementation of the mitigation measures in the Environmental and Social Commitment Plan (ESCP).” **There should be minimum requirements on the frequency of receiving this feedback and on the variety of stakeholders submitting their inputs** especially for high-risk projects and for all operations in fragile and conflict countries. “Appropriate stakeholder engagement practices” during implementation should also be identified for high-risk projects. **Feedback representing inputs of a balanced group of stakeholders throughout the project cycle should be reflected in the Implementation Status Report (ISR) whose aim is to report and present evidence on safeguard policy performance.**

Grievance Mechanisms:

- The draft environmental and social standard 10 requires **the borrowing government to “provide a grievance mechanism, process or procedure** to receive and facilitate resolution of stakeholders’ concerns and grievances regarding the Borrower’s environmental and social performance.”
- Article 51 of the Bank’s Environmental and Social Policy states that there is also a **Grievance Redress Service (GRS)** to which affected communities could submit their complaints.
- The independent Inspection Panel is the last resort for complainants if they are not satisfied with how their complaints were handled by the above two mechanisms.
- According to the environmental and social standard 10, the borrower is required to provide information on the first mechanism (the borrower’s) to stakeholders, and not on the two other mechanisms that are provided by the Bank. **Stakeholders should be informed of all available options for grievance.**
- Although the standard allows anonymous complaints to be submitted at the project level using the borrower’s grievance mechanism (article 23b), given that the borrower and implementing agency are responsible for the management and employment of workers to this mechanism, they are able to retaliate against the complainants. **Complainants should have the option of submitting their anonymous complaints directly through the Bank’s mechanisms.**
- It is clear from this draft that project-affected communities will not be able to submit their complaints to the Bank’s Inspection Panel without first going through the grievance redress mechanism. Not only is this a lengthy process, but by the time the complainants are able to go to the Inspection Panel, many project-associated risks can no longer be mitigated or repaired

(Environmental and Social Policy, article 51). **Exceptions should be granted for urgent complaints to allow their submission directly to the Inspection Panel.**