

To
World Bank Safeguard Policies Review Team

Gender disparities and inequalities will continuously widen if the World Bank does not provide a protection to women and their rights from impacts and risks of its operations. We welcome that gender will be also addressed during the World Bank Safeguard Policies Review as one of the emerging issues. It is timely to assess gaps in the existing safeguard policies under review and how to address them. We hope that impacts and risks of WB operations to women and their families would be reduced through a better new set of safeguard policies.

We have assessed the World Bank current Safeguard Policies under review in gender perspectives, including terms adopted by the World Bank from UNDP training module and used by WBI/PRMGE (World Bank Institute and World Bank Poverty Reduction Management & Gender Division).

We conclude that those safeguards are gender blind and do not indicate as having gender awareness at all. Those safeguard policies fail to: 1) recognize gender as an influencing and an equally important factor in projects, program and policy; 2) apply gender analysis into projects, programs and policies; 3) recognize that women and men have different needs and power; and 4) provide space for gender equality. This gender blindness of the safeguard policies lead to no requirement to protect women and their rights from potential and foreseeable negative impacts and risks associated with Bank lending operations.

Our conclusion from assessing eight WB Safeguard policies is as follows:

1. OP 4.01 - Environmental Assessment (EA) is gender blind as it does not consider women as a right holder and a stakeholder, and does not require gender impacts and risks assessment of the changing environment or landscape of livelihoods to women in regard to sexual and reproductive health and safety; or gender dimensions in the social aspects; no specific measures are required in the EA to promote women's equal participation decision making and to address a gap that disadvantage women. It fails to recognize gender as an essential determinant of social outcomes.
2. OP 4.04 - Natural Habitats is gender blind and does not have gender awareness because a gender analysis is not required in determining project's substantial benefits. Gender considerations are also not required in the mitigation measures within the project.
3. OP 4.09 - Pest Management is gender blind and does not have gender awareness because it neither requires gender analysis nor covers project impacts and risks to women's sexual and reproductive health.
4. OP 4.10 - Indigenous Peoples considers assurance of project's benefits for indigenous women, but does not have requirements for gender analysis on impacts and risks to indigenous women from proposed activities supported by WB nor gender-disaggregated baseline information is required on demographic, social, cultural, and political characteristics of the affected Indigenous Peoples'

communities, the land and territories. Moreover, consultations to indigenous women are not required and indigenous women cultural preference, which is based on their identity and uniqueness, are not considered in the deliberations of resettlement of Indigenous Peoples;

5. OP 4.11 - Physical Cultural Resources is gender blind and not gender aware because it does not even stipulate a provision to involve women and gender experts in consultations in developing a Term of Reference of EA for impacts of projects on these resources.
6. OP 4.12 - Involuntary Resettlement includes women in the vulnerable groups among those displaced but indicates itself as gender blind and not gender aware. It is not sufficient to mention women as one of the vulnerable groups without providing specific requirements for measures to assist them in dealing with difficult situation triggered by involuntary resettlement activities. This is because the policy does not require an assessment of impacts of resettlement activities to women and their rights nor considers components of women's specific needs; no gender disaggregated baseline data is required for the census and this would trigger women for being left out from receiving compensation and other assistances, and also hinder their involvement in consultations and decision-makings. Moreover, there is no gender sensitive and responsive grievance mechanism is developed for women; nor provision to consider female-headed households.
7. OP 4.36 - Forest is gender blind and is not gender aware because it does not have provisions to include women in meaningful participation in developing a forest standard system; gender potential impacts and risks are not specifically required. Women are not differentiated from the local people, and gender issues and women's rights are not included among the issues for information related to forest that are provided to the Bank for its deliberations and for providing measures to meet project's economic, environmental, and social objectives. Hence, women will be left out from those developed measures.
8. BP 4.37 - Safety of Dams is gender blind and is not gender aware. The dams' potential adverse impacts are assessed through OP/BP4.01 (Environmental Assessment) that does not require gender analysis and considerations to women's rights. Hence, significant and adverse impacts of the dams to women won't be identified and they will be left out from any mitigation measures.
9. OP 4.00 - Policy on Piloting the Use of Borrower Systems for Environmental and Social Safeguards ("Use of Country Systems") adheres to the applicable operational principles set out in Table A1- Environmental and Social Safeguard Policies—Policy Objectives and Operational Principles. Majority of the policy objectives and operational principles are gender blind and not gender aware.

Those findings and conclusion are worrisome considering the high amount of World Bank financing and its operations in various sectors in our places.

We strongly recommend that the World Bank uses this Safeguard Policies Review as an opportunity to fix this problem of insufficient gender awareness and does the best efforts to come out with a set of new WB safeguard policies review that is gender awareness in

exclusive the policy framework to protect women from its financing operations and rigorous requirements for gender considerations.

Our recommendations:

As principles of the policy framework:

- Adhere to international agreements, conventions and declarations particularly CEDAW (Convention on Elimination of Discriminations against Women), UN-Covenant on Civil-Political Rights, UN Covenant on Economic, Social and Cultural Rights, UN Declaration on Rights of Indigenous Peoples
- Protection to women their rights and commitment for preventing women from impacts and risks of WB operations;
- Inclusion of gender awareness attitude by acknowledging different experiences of women and men in facing impacts and risks of WB operations; and also acknowledging specific needs of women;
- Differentiation of women and men from people or community in order to be more clear and details about impacts and risks, mitigation measures and assistance tailored to the specific needs, identities and uniqueness of women;
- Acknowledgment to women as one of the rights holder and stakeholders in the community, as an essential determinant of social outcomes;
- Acknowledgement of gender dimensions in the social aspects; and
- Acknowledgment of women as heads of households and women's differential status, experiences, and needs within male-headed households

As policy requirements:

- Gender impacts and risks assessment of the changing environment or landscape of livelihoods to women in regard to health, including sexual and reproductive health and safety;
- Specific measures to involve women in any decision making in regard to environmental assessment, mitigations, resettlement and other development plans;
- Gender disaggregated baseline data and information on demographic, economic, social, cultural, and political status;
- Specific and culturally-appropriate measures to assist displaced local and indigenous women in dealing with difficult situation triggered by involuntary resettlement activities;
- Gender sensitive and responsive grievance mechanism;
- Specific measures to consider female-headed households.

Attach is a gender assessment of existing World Bank Safeguard Policies under Review.

April 30, 2013

Endorsers:

Indonesian Civil Society Organizations:

1. Titi Soentoro, Aksi! for gender, social and ecological justice, Indonesia
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3. Zohra Andi Baso, Forum Komunikasi Perempuan Sulawesi Selatan, Indonesia
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31. Jafar Ibnu Muslim, Batam
32. Ida Ruwaida, Palu
33. Wiwien Matindas, Palu
34. Sri Mustika, Palu
35. Maya Safira, Palu
36. Rosnawati, Palu
37. Sriwati, Palu
38. Sumarni, Palu
39. Rahmawati, Palu
40. Indriyani, Palu
41. Indah Fajarwati, Palu
42. Tallo, Palu
43. Muria, Palu
44. Baria, Palu
45. Marfini, Banda Aceh
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International Civil Society and Organizations:

1. Yasmin Karim, UN Women CSAG member, Pakistan
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Attachment:

Gender Assessment on World Bank Safeguard Policies under Review and Recommendations for Protection to Women and their Environment

It would be a missed opportunity for the World Bank if its Safeguard Policies Review, that was launched October last year, fails to provide a robust protection to women and their rights from impacts and risks of its operations. Many women from indigenous and local communities in the global South experience hardships of social and gender injustices due to land grabbing, forced eviction, loss of livelihood, and violations of their human rights. Gender disparities and inequalities will increasingly widen if the World Bank continue its existing practices by doesn't provide a policy to protect women and their rights or guard against harmful gender impacts and risks of its operations. The World Bank's current Gender and Development Policy is not enforceable, and lacks the do no harm mandate to hold World Bank investments accountable for their negative gender impacts. Moreover, objectives of World Bank's Gender and Development Policy, which is "... *to assist member countries to reduce poverty and enhance economic growth, human well-being, and development effectiveness ...*"¹, will stay, unfortunately, as a lip service.

Women and men have different experiences in facing the same problem due to its gender. World Bank defines gender as "... *culturally based expectations of the roles and behaviors of males and females. The term distinguishes the socially constructed from the biologically determined aspects of being male and female.*"². It explains further that gender is associated with disparities between men and women in access to resources, in economic opportunities, and in voice. Throughout the developing world, women and men differ in legal, social, and economic rights. Some form of disparity due to gender is found in all countries; it hampers men and women in various ways: in access to education and to financial services; in opportunities for jobs, entrepreneurship, and agriculture; and in voice at the community, professional, and national levels. Gender disparities are reflected in laws, policies and regulations, and institutional systems and lead to inefficiencies across numerous sectors of the economy³.

Moreover, women's opinions and needs often are left out, ignored and marginalized in regard to development in their places are among others because of the lack of access and control over decision made about that development including development financing by the World Bank. Safeguard policies to protect women and women's rights from gender, social and ecological impacts and risks of development policies, programs and projects, are not specifically provided. Hence, women, particularly poor rural and urban women, are left out from the development and a phenomenon of feminization of poverty is increasing.

In addressing gender-based problems, mainstreaming a gender perspective in all types of activities (referred to as gender mainstreaming) is a globally accepted strategy for promoting gender equality. World Bank and ADB also adopted this strategy. Mainstreaming gender into World Bank's work to address gender inequality is a strategy of the World Bank for poverty eradication. World Bank's Gender and Development policy framework comprises nine Operational Policies (OPs) and/or Bank Procedures (BP): five are relevant for

¹ OP 4.20 – Gender and Development, revised March 2012, para 1 at:

<http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTOPMANUAL/0..contentMDK:20064559~pagePK:64141683~piPK:64141620~theSitePK:502184,00.html>

² The World Bank Gender and Development Policy Framework –A Guidance Note, p.2 at:

http://siteresources.worldbank.org/INTGENDER/Resources/GAD_PolicyFramework.pdf

³ Ibid.

investment lending generally, one for development policy lending, and three for safeguard policies (indigenous peoples; involuntary resettlement; and forest)⁴. Other safeguard policies including environmental assessment and pest management are not included in GAD policy frameworks.

In October 2012 the World Bank launched a two- year review of its eight environmental and social safeguard policies⁵. According to World Bank’s definition, safeguard policies aim to “ ... prevent and mitigate undue harm to people and their environment in the development process. These policies provide guidelines for bank and borrower staffs in the identification, preparation, and implementation of programs and projects. These policies provide guidelines for bank and borrower staffs in the identification, preparation, and implementation of programs and projects”⁶. Each of those safeguard policies is equipped with a set of requirements to identify, avoid and mitigate the potential negative impacts associated with Bank lending operations in ensuring that project options under consideration are sound and sustainable, and that potentially affected people have been properly consulted⁷.

1. Gender considerations in current World Bank Safeguard Policies

Safeguard policy aims to protect people from impacts and risks of programs and projects financed by WB; meanwhile Gender and Development Policy aims to achieve gender equality, and this policy is not considered as a safeguard policy. In other words, it seems that “equality” is targeted without a set of protection of women and women’s rights from impacts and risks of the Bank’s operations. This is a clear indication of a loophole in WB policies and operations that triggers problems experienced by women in dealing with WB-financed development programs and projects.

This paper aims to assess the gender dimension of eight safeguard policies under review, not only the three safeguard policies that are included in Gender and Development Policy Framework. Moreover, this paper also gives recommendations to fill in the gaps in order to provide and ensure better protection to women. Hence, impacts and risks of WB operations to women and their families would be reduced.

1.1. Gender perspective as a tool to assess current World Bank Safeguard Policies under review

Premises to assess the eight safeguard policies are as follows:

⁴ op. cit. Guidance Note, p. 5.

⁵ OP 4.01 Environmental Assessment, OP 4.04 Natural Habitats, OP 4.09 Pest Management, OP 4.10 Indigenous Peoples, OP 4.11 Physical Cultural Resources, OP 4.12 Involuntary Resettlement, OP 4.36 Forests, OP 4.37 Safety of Dams, and Policy on Piloting the Use of Borrower Systems for Environmental and Social Safeguards (“Use of Country Systems”), OP 4.00, at The World Bank’s Safeguard Policies, Proposed Review And Update, Approach Paper, October 10, 2012, para 3, p. 1 at: <http://siteresources.worldbank.org/EXTSAFEPOL/Resources/584434-1306431390058/SafeguardsReviewApproachPaper.pdf>

⁶ at:

<http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTSAFEPOL/0..menuPK:584441~pagePK:64168427~piPK:64168435~theSitePK:584435,00.html>

⁷ At:

<http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTSAFEPOL/0..contentMDK:20543912~menuPK:1286357~pagePK:64168445~piPK:64168309~theSitePK:584435,00.html>

- Gender consideration:
 - It is widely acknowledged that gender based discrimination causes inequality between women and men. Women experience a situation of less access to education and health service, less opportunity in getting job, in the wage and compensation, in involvement in decision-makings in public and also in the domestic sphere. Gender based discrimination also triggers gender injustices that manifest in violence, stereotyping, double burden, subordination and marginalization of women. Based on this reality measures are developed and taken to consider women's experiences, opinions, practical and strategic needs into the development of any policies, programs and projects.
- Gender disaggregated information and data:
 - Since women and men have different experiences in facing and handling problems due to the existing gender construction in societies, information and data related to them must be disaggregated. This kind of information and data will assist a development of measures to avoid impacts and risks to women and their rights, and also provide opportunities and benefits to women be involved.
- Differentiate women and men from the term people or community:
 - People or community is not a homogenous entity, but comprises women and men with different gender division of labor and different experiences. Women, along with their experiences, are invisible in those terms of people or community. Hence, for understanding, clarity and emphasis, women and men have to be differentiated. Moreover, the term people or community most often refers to men and does not automatically pertains to women. Due to gender division of labor in the family and society, men automatically assume the role as representatives of women in the family, community and society;
 - Women should be explicitly acknowledged as a stakeholder and as one of the stakeholders in their communities.
- Gender impacts and risk assessment:
 - Environmental Impact Assessment usually does not include gender impacts assessment, which is impact on the different roles and responsibilities of women and men directly from to the changing of environmental landscape;
 - Environmental impacts are not only related to environment, but can also trigger further impacts to social-economic situation and gender relation. Therefore, it is also important to assess the indirect social, political, and economic impacts of affected environment.
- Specific impacts and risks to women and their rights:
 - Impacts and risks of a project will not only affect health in general, but also women's health, which is manifested in their sexual and reproductive health.
 - Women have practical and strategic needs in their lives. These needs have to be identified through gender impacts and risks assessment.
 - Women's differential status, experiences, and needs within male-headed households

- Women’s friendly information disclosure:
 - Information that is tailored and provided in regards to the situation of women, with specific and sensitive consideration to those who are not formally schooled, have no access to education, do not have access to new technologies, and do not have access to make decision in the public.

- Participation of women in consultations and decision making:
 - Women have less access to decision-making, so they are not used to articulating their opinions and needs, all the more in public. Women’s opinions and considerations need to be gathered and heard, as they will be also affected by the project. Therefore, specific measures to involve women in the decision making have to be taken by necessarily considering their productive and reproductive work.

- Single women and women as a head of the household:
 - States in the global South mostly recognize men only as heads of the household. Though millions of women are heads of the household, they are not recognized as such, and in effect, these women are left out in the decision-making processes related to their lives and families. Hence, specific attention has to be paid to women as heads of the household.
 - Moreover, women without family (single women) are the most marginalized within the already marginalized groups in the society because they are invisible and mostly represented by the male members of the family. Particular needs and opinions of women living alone without husband and family are usually neglected. As they are also part of affected people, their specific conditions need to be considered too.

- Gender-sensitive grievance mechanism:
 - Gender sensitive means aware of the existing gender relation that put women in a subordinated position in decision making; and therefore, the grievance mechanism must be responsive to this situation by considering women’s own opinion and needs.
 - Grievance mechanism should acknowledge the existing gender based relation, and responsive to women’s specific problems related to the project.

The aforementioned premises (page 5-7) are additional to the existing terms adopted by the World Bank from UNDP training module and used by WBI/PRMGE⁸ on a Glossary of Gender Terms⁹, among others:

- Gender awareness:
 - *“An understanding that there are socially determined differences between women and men based on learned behavior, which affects access to and control resources. This awareness needs to be applied through gender analysis into projects, programs and policies”;*

- Gender equity:

⁸ Acronyms for World Bank Institute and World Bank Poverty Reduction Management & Gender Division

⁹ WBI/PRMGE, Gender and Development, A Trainer’s Manual, Glossary of Gender Terms, at: <http://info.worldbank.org/etools/docs/library/192862/introductorymaterials/Glossary.html>

- *“Entails the provision of fairness and justice in the distribution of benefits and responsibilities between women and men. The concept recognizes that women and men have different needs and power and that these differences should be identified and addressed in a manner that rectifies the imbalances between the sexes”;*
- Gender equality:
 - *“The result of the absence of discrimination on the basis of a person’s sex in opportunities and the equal allocation of resources or benefits or in access to services”;*
- Gender blind:
 - *“A failure to recognize that gender is an essential determinant of social outcomes impacting on projects and policies. A gender-blind approach assumes gender is not an influencing factor in projects, programs or policy.”*

1.2. Current WB Safeguard Policies under gender consideration lens

1.2.1. Environmental Assessment:

OP 4.01 - Environmental Assessment¹⁰ does not contain any word regarding gender and women. The Environmental Assessment (EA) takes into account the natural environment (air, water, and land); human health and safety; social aspects (involuntary resettlement, indigenous peoples, and physical cultural resources); and trans-boundary and global environmental aspects (para 3); and includes climate change, ozone-depleting substances, pollution of international waters, and adverse impacts on biodiversity (footnote 5).

- There is no requirement to do gender analysis on the changing environment or landscape of livelihoods to women in regard to health, including sexual and reproductive health, and safety; or considerations of gender dimensions in the social aspects analyzed in the EA.
- If we look at the definition above, OP4.01 is gender blind. This policy fails to recognize gender as an essential determinant of social outcomes. If there is no gender analysis required, consequently there is no sufficient information about the social outcomes. This policy is also not gender aware if we look at it under the definition of gender awareness above (page 7).
- Changing of environmental landscape will have impacts to the environment itself and also lives and livelihoods of the communities on sites. Hence, this environmental change due WB operations has to be gender analyzed to measure its potential impacts and risks to lives of women and to women’s rights.
- In regard to the provision on public consultation (para 14) in this EA, it is not required to consult women. Gender as a socially constructed relation places women in the domestic sphere and let the men make decisions in the public sphere. Experiences show that most of the time specific needs of women are not considered in decision-making because they are not involved; furthermore, this condition perpetuates the gender gap to achieve gender equity. WB adopts a definition of gender equity that acknowledges different needs and power between men and women, but not the OP 4.01 because there is no specific measures required in the

¹⁰ at:

<http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTOPMANUAL/0,contentMDK:20064724~menuPK:64701637~pagePK:64709096~piPK:64709108~theSitePK:502184.00.html>

EA to involve women in any decision makings and to address a gap that disadvantage women again and again.

Similarly is with the disclosure provisions of the EA (para 15, 16, and 17).

- Public space is not a women's place according to their common gender based norm, hence, women mostly are not informed in proper and comprehensive ways about project plans in their places.
- Since there is no specific measures required to provide women with information about projects, programs and policies that are essential to fill in the existing gaps in information and decision-making, OP 4.01 is gender blind.

1.2.2. Policy on Natural Habitat

OP 4.04: Natural Habitats¹¹ does not have provisions in regard to women and gender. Natural habitat relates to lives of communities and in this case particularly to women due to their works in gathering foods and medicinal herbs. According to this policy, the Bank can still support projects that cause significant loss or degradation.

- This policy is gender blind and does not have gender awareness because a gender analysis is not required in determining project's substantial benefits and gender considerations in the mitigation measures within the project.

1.2.3. Policy on Pest Management:

OP 4.09 Pest Management¹² does not have any provision related to women or to sexual and reproductive health of women. Health of women including their sexual and reproductive health, and of their families are related and limited to the health of their environment. Many women are active in agriculture, as employment or for sustaining their livelihood. For example, in Southeast Asia, 30% of employed women are in agriculture, in South Asia 55% and CIS¹³ 48%¹⁴. Many women are frequently exposed to dangerous pesticide through their activities in agriculture.

The Green Revolution during the 1970-1980's commercialized agriculture for markets among others by introducing and encouraging massive and extensive use of chemical fertilizer and pesticide to farmers in the global South to increase agriculture production. Many pesticides are harmful to the reproductive system in other ways. Scientists now understand that exposure to pesticides can cause a wide range of reproductive harms affecting men, women and children alike. Pesticides have also been implicated in miscarriage, premature birth, reduced fertility in both men and women, altered sex ratio (fewer boys being born) and a number of developmental defects¹⁵.

¹¹ at:

<http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTSAFEPOL/0..contentMDK:20543920~menuPK:1286576~pagePK:64168445~piPK:64168309~theSitePK:584435.00.html>

¹² at:

<http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTOPMANUAL/0..contentMDK:20064720~menuPK:64701637~pagePK:64709096~piPK:64709108~theSitePK:502184.00.html>

¹³ Commonwealth of Independent States (CIS) is an alliance of all republics of the former Soviet Union. CIS Asia includes Armenia, Azerbaijan and Georgia; CIS in Asia includes the Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan and Uzbekistan.

¹⁴ United Nations, Department of Economic and Social Affairs, The World's Women 2010: Trends and Statistics, 2010, Table 4.6, p. 86, at:

http://unstats.un.org/unsd/demographic/products/Worldswomen/WW_full%20report_BW.pdf

¹⁵ Pesticide Action Network North America, at: <http://www.panna.org/your-health/reproductive-health>

In Bank-financed projects, the borrower addresses pest management issues in the context of the project's environmental assessment (para 1). However,

- OP 4.01 does not require gender analysis and does not cover project impacts to women's sexual and reproductive health.
- In regard to strengthening the capacity of country's environmentally sound pest management (para 2), no component of women's sexual and reproductive health is included.
- Potential harmful effects on women's sexual and reproductive health are not included in the criteria of pesticide selection and use (para 6.a).

OP 4.09 is, therefore, gender blind and does not have gender awareness.

1.2.4. Policy on Indigenous Peoples

OP 4.10 Indigenous Peoples¹⁶ aims among others to ensure that Indigenous Peoples receive social and economic benefits that are culturally appropriate and gender and inter-generationally inclusive (para 1); recognizes gender and intergenerational issues among Indigenous Peoples are also complex (para 2); ensures that in consultations the borrower establishes an appropriate gender and inter-generationally inclusive framework (para 10.a); gives special attention to the concerns of Indigenous women, youth, and children and their access to development opportunities and benefits (para 10.b); addresses the gender and intergenerational issues that exist among many Indigenous Peoples, including the special needs of indigenous women, youth, and children (para 22.d); and prepare participatory profiles of Indigenous Peoples to document their culture, demographic structure, gender and intergenerational relations and social organization, institutions, production systems, religious beliefs, and resource use patterns (para 22.e).

Provisions on gender considerations in this OP 4.10 are more in regard to ensure benefits for indigenous women from the project. However, those measures are not supported by a set of requirements for gender analysis on impacts and risks to indigenous women and their rights from proposed activities supported by the Bank.

Some examples:

- The social assessment required to borrower on projects that affect Indigenous Peoples is specified in para 9 and Annex A¹⁷.
 - However, gender analysis to identify impacts and risks to indigenous women is not required in para 9, and
 - No gender disaggregated baseline information and data are required on demographic, economic, social, cultural, and political characteristics of the affected Indigenous Peoples' communities, the land and territories (Annex A, para 2b);
- The baseline information is used to identify key project stakeholders (Annex A, para 2c).

¹⁶ at:

<http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTOPMANUAL/0,,contentMDK:20553653~menuPK:64701637~pagePK:64709096~piPK:64709108~theSitePK:502184,00.html>

¹⁷ OP 4.10, Annex A - Social Assessment at:

<http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTOPMANUAL/0,,contentMDK:20564681~menuPK:64701637~pagePK:64709096~piPK:64709108~theSitePK:502184~isCURL:Y,00.html>

- If there is no gender disaggregated baseline information and data provided, indigenous women would not be included as one of the main project stakeholders, and they are left out and excluded from any process of consultation and decision-making;
- Critical to determination of potential adverse impacts is an analysis on 'relative vulnerability of and risks to affected Indigenous Peoples' communities given their distinct circumstances and close ties to land and natural resources, as well as their lack of access to opportunities relative to other social groups in the communities, regions, or national societies in which they live' (Annex A, para 2d).
 - Gender analysis is not included in determining the impacts and risks;
- Social scientists are engaged to evaluate the project's potential positive and adverse effects on the Indigenous Peoples (para 9).
 - There is no gender expert required for preparing and carrying out the social assessment;
- Consultations with Indigenous Peoples in regard to commercial development of natural resources (para 18.b) does not specify potential impacts to indigenous women and their rights;
- The borrower includes in the IPP arrangements to enable the Indigenous Peoples to share equitably in the benefits to be derived from such commercial development (para 18.c).
 - This provision does not specify arrangements for indigenous women;
- Commercial development of Indigenous Peoples' cultural resources and knowledge (for example, pharmacological or artistic) has to inform its potential effects on Indigenous Peoples' livelihoods, environments, and use of such resources. Moreover, agreement of Indigenous Peoples is conditional upon their prior agreement to such development (para 19.c).
 - No information on the potential impacts on indigenous women is required, and also no consent from indigenous women;
- In regard to physical relocation of Indigenous Peoples it is predicted to have significant adverse impacts on their identity, culture, and customary livelihoods; consultations and support from Indigenous People are needed; and develop a resettlement plan that is compatible with the Indigenous Peoples' cultural preferences (para 20).
 - The adverse impacts to indigenous women and their rights are not included; inclusive and participatory consultations with indigenous women are not required and indigenous women cultural preference are not considered in the deliberations of resettlement of Indigenous Peoples;
- A process framework is prepared to provide guidelines for preparation, during project implementation, of an individual parks and protected areas' management plan. It is to ensure that the Indigenous Peoples participate in the design, implementation, monitoring, and evaluation of the management plan, and share equitably in the benefits of the parks and protected areas (para 21).

- There is no provision to ensure Indigenous women's involvement and their meaningful participation in this process.

Provisions on gender considerations in this OP 4.10 are more in regard to ensure benefits for indigenous women from the project. However, those measures are not supported by a set of requirements for protection of women and their rights by doing gender analysis on impacts and risks to indigenous women from proposed activities supported by the Bank.

OP 4.10 provides requirements to achieve gender equity and gender equality. However, this policy contradicts itself because benefits for indigenous women from project development will not be materialized if there are no provisions required to analyze impacts and risks before to build the basis for such, to provide women with correct and comprehensive information, and to involve women in decision-making.

1.2.5. Policy on Physical Cultural Resources

OP 4.11 Physical Cultural Resources¹⁸ does not have provision to involve women and gender expert in consultations in developing a Term of Reference of EA for impacts of projects on these resources. Hence, this policy is gender blind and not gender aware.

1.2.6. Policy on Involuntary Resettlement

OP 4.12 Involuntary Resettlement¹⁹ includes women in the vulnerable groups among those displaced (para 8). However, there is no specific measure development to ensure that women will not be disadvantaged by involuntary resettlement activities triggered by the projects. Women's should be acknowledge also as a rights holder, whose rights are threatened by activities of involuntary resettlement.

Some examples:

- This Policy requires that displaced persons and their communities are provided timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementing, and monitoring resettlement. Appropriate and accessible grievance mechanisms are established for these groups (para 9.a).
 - Women are not specifically mentioned as displaced persons, and no gender sensitive and responsive grievance mechanism is required to be developed;
- In new resettlement sites or host communities, infrastructure and public services are provided as necessary to improve, restore, or maintain accessibility and levels of service for the displaced persons and host communities. Alternative or similar resources are provided to compensate for the loss of access to community resources (para 9.b).

¹⁸ at:

<http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTOPMANUAL/0,,contentMDK:20066696~menuPK:64701637~pagePK:64709096~piPK:64709108~theSitePK:502184~isCURL:Y,00.html><http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTOPMANUAL/0,,contentMDK:20970737~menuPK:64701637~pagePK:64709096~piPK:64709108~theSitePK:502184.00.html>

¹⁹ at:

<http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTOPMANUAL/0,,contentMDK:20066696~menuPK:64701637~pagePK:64709096~piPK:64709108~theSitePK:502184.00.html>

- There is no requirement to assess component of women’s specific needs in new resettlement sites and public services;
- Borrower carries out a census to identify the persons who will be affected by the project to determine who will be eligible for assistance; also develops a procedure, for establishing the criteria by which displaced persons will be deemed eligible for compensation and other resettlement assistance. The procedure includes provisions for meaningful consultations with affected persons and communities, local authorities, and, as appropriate, nongovernmental organizations (NGOs), and it specifies grievance mechanisms.(para 14).
 - No gender disaggregated baseline data is required for this census. Women will easily be ignored if there is no gender disaggregated data and information are provided. Women will also be precluded from receiving compensation and other assistance, and participating in consultations and decision-making. Moreover, no gender sensitive and responsive grievance mechanism is set-up for women.
- Criteria for Eligibility of displaced persons are people who: have formal legal rights to land; do not have formal legal rights to land but have a claim to such land or assets; have no recognizable legal right or claim to the land they are occupying (para 15).
 - Many women do not have land titles or assets. Without considering women in those situations, women will not be eligible in this set of criteria.
 - And, if since they are not eligible as displaced persons, women will not be provided resettlement assistance and compensation for loss of assets other than land (as the provision in para 16).
- The borrower draws on appropriate social, technical, and legal expertise and on relevant community-based organizations and NGOs to prepare the resettlement component or subcomponent. Moreover, the borrower informs potentially displaced persons at an early stage about the resettlement aspects of the project and takes their views into account in project design (para 19).
 - No gender expert is included here.
 - There is no specific measures developed to inform potentially displaced women about resettlement aspects and to take views of women in the project design; and
 - There are no measures to strengthen capacity of displaced women to participate more effectively in resettlement operations.
- Bank may provide assistance and finance also to affected people (para 32.b).
 - Women’s opinions and needs are not specifically mentioned and therefore are easily excluded.
- No provision regarding female-headed households.

It is not sufficient to mention women as one of the vulnerable groups without providing specific requirements on how to assist them in dealing with difficult situation triggered by involuntary resettlement activities. This OP 4.12 is gender blind and not gender aware.

1.2.6.1. OP 4.12, Annex A - Involuntary Resettlement Instruments²⁰

This annex describes elements of the resettlement plan. Therefore, it is important to assess whether there are gender sensitive and responsive elements in the plan that address the situation and needs of displaced women.

Some examples:

- Socio-economic studies are conducted with involvement of potentially displaced people on several aspects. Looking at requirements under this provision:
 - Para 6.ii does not require a provision of gender disaggregated baseline information;
 - Para 6.a.iv does not include women in information about vulnerable groups; and
 - Para 6.a.iv does not include gender based relation on social and cultural characteristics of displaced communities.
- A package of compensation and other resettlement measures that will assist each category of eligible displaced persons and this package should be compatible with the cultural preferences of the displaced persons, and prepared in consultation with them (para 11).
 - If women are not eligible as displaced persons because of the missing gender disaggregated baseline information, that assistance will not be provided to them;
 - It is important to be keep in mind that not only cultural preference is important for displaced persons but also women's preference.
- Grievance procedures for third-party settlement of disputes arising from resettlement developed (para 17) are not gender sensitive and responsive.
- A process framework describes participatory processes of following activities do not consider gender issues and the situation of women, to wit:
 - Para 27.a does not require involvement of women in the project design (para 27.a); and
 - Para 27.b does not substantiate women among the potential affected communities to be involved in identifying any adverse impacts, assessing of the significance of impacts, and establishing of the criteria, and for eligibility for any mitigating or compensating measures necessary.

The Annex of OP 4.12 is also gender blind and not gender aware.

1.2.7. Forest Policy

OP 4.36 Forest²¹ is to be applied for project that affects the rights and welfare of people and their level of dependence upon or interaction with forests (para 3.b.).

²⁰ at:

<http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTOPMANUAL/0..contentMDK:20066696~menuPK:64701637~pagePK:64709096~piPK:64709108~theSitePK:502184,00.html>

²¹ at:

<http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTOPMANUAL/0..contentMDK:20064668~menuPK:64701637~pagePK:64709096~piPK:64709108~theSitePK:502184,00.html>

- There is no acknowledgement that women are also a part of the people, thus, women's rights and welfare are not considered.

A forest standard system must be developed with the meaningful participation of local people and communities; indigenous peoples; non-governmental organizations representing consumer, producer, and conservation interests; and other members of civil society, including the private sector (para 11).

- No specific measure is required to involve women in this activity.

In accordance with OP/BP 4.01, *Environmental Assessment*, the environmental assessment (EA) for an investment project addresses the potential impact of the project on forests and/or the rights and welfare of local communities (para 13).

- No specific measure is required to involve women in this activity.

For projects involving the management of forests proposed for Bank financing, the borrower furnishes the Bank with relevant information on the forest sector concerning the borrower's overall policy framework, national legislation, institutional capabilities, and the poverty, social, economic, or environmental issues related to forests. This information should include information on the country's national forest programs or other relevant country-driven processes. On the basis of this information and the project's EA, the borrower, as appropriate, incorporates measures in the project to strengthen the fiscal, legal, and institutional framework to meet the project's economic, environmental, and social objectives. These measures address, among other issues, the respective roles and legal rights of the government, the private sector, and local people. Preference is given to small-scale, community-level management approaches where they best harness the potential of forests to reduce poverty in a sustainable manner (para 14).

- Women are not differentiated from the local people and gender issue is not included among the issues for information related to forest that is provided to the Bank for its deliberations.
- Since this information is the basis of the Bank for providing measures to meet project's economic, environmental, and social objectives, women will be left out and excluded from those developed measures.

This OP 4.36 is gender blind and is not gender aware

1.2.8. Policy on Safety of Dams

OP 4.37 Safety of Dams²² provides requirements for dam's construction in its technical aspects.

BP 4.37 - Safety of Dams²³

Potential adverse impacts of the dams are addressed through OP/BP4.01 (Environmental Assessment) and not OP/BP4.37, and measures will be included in the Environmental Management Plan or Environmental and Social Management Framework, as applicable, in accordance with OP/BP4.01 (Environmental Assessment) (para 9).

²² at:

<http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTOPMANUAL/0..contentMDK:20064653~menuPK:64701637~pagePK:64709096~piPK:64709108~theSitePK:502184,00.html>

²³ at:

<http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTOPMANUAL/0..contentMDK:20064589~menuPK:4564187~pagePK:64709096~piPK:64709108~theSitePK:502184,00.html>

- Since a gender analysis is not required in environmental assessment, so significant and adverse impacts of the dams to women will not be identified and they will be left out from any mitigation measures.

This OP/BP 4.37 is gender blind and is not gender aware.

1.2.9. Policy of the Use of Country System

OP 4.00 Policy on Piloting the Use of Borrower Systems for Environmental and Social Safeguards (“Use of Country Systems”)²⁴ allows borrowers to apply their own country systems if the borrower's system is designed to achieve the objectives and adhere to the applicable operational principles set out in Table A1(para 2).

Assessing the Table A1²⁵ - Environmental and Social Safeguard Policies—Policy Objectives and Operational Principles, majority of the policy objectives and operational principles are gender blind and not gender aware.

1.2.9.1. Policy objectives and operational principles of Environmental Assessment

- Policy objectives: “To help ensure the environmental and social soundness and sustainability of investment projects and to support integration of environmental and social aspects of projects into the decision making process.”
 - These objectives do not consider gender aspects in Environmental Assessment and ensure participation of women in the decision-making process.
- Operational Principle 2: Assess potential impacts of the proposed project on physical, biological, socio-economic and physical cultural resources, including trans-boundary and global concerns, and potential impacts on human health and safety.
 - It is not a part of the principles to assess potential impacts on gender based relations and to women, on women’s health particularly their sexual and reproductive health and safety.
- Operational Principle 7: Involve stakeholders, including project-affected groups and local nongovernmental organizations, as early as possible, in the preparation process and ensure that their views and concerns are made known to decision makers and taken into account. Continue consultations throughout project implementation as necessary to address EA-related issues that affect them.
 - It is not a part of the principles to acknowledge the fact that women as right holders, stakeholders and project-affected people, and provide specific measures to involve them throughout the project;
 - It is not a part of the principles to ensure women’s views and concerns are made known to decision makers and taken into account.

²⁴ at:

<http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTOPMANUAL/0,contentMDK:20403230~menuPK:64701637~pagePK:64709096~piPK:64709108~theSitePK:502184,00.html>

²⁵ at:

<http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTOPMANUAL/0,contentMDK:20403235~menuPK:64701637~pagePK:64709096~piPK:64709108~theSitePK:502184,00.html>

- Operational Principle 8: Use independent expertise in the preparation of EA where appropriate. Use independent advisory panels during preparation and implementation of projects that are highly risky or contentious or that involve serious and multi-dimensional environmental and/or social concerns.
 - It is not a part of the principles to use gender expert in the preparation of EA;
 - It is not a part of the principles to make gender concerns considered as high-risk and serious problems.
- Operational Principle 9: Provide measures to link the environmental assessment process and findings with studies of economic, financial, institutional, social and technical analyses of a proposed project.
 - It is not a part of the principles to link the environmental assessment with a gender analysis and a study on women's situation.
- Operational Principle 11: Disclose draft EA in a timely manner, before appraisal formally begins, in an accessible place and in a form and language easily understandable to key stakeholders.
 - It is not a part of the principles to disclose EA in a women's friendly manner, in women's accessible place and in a form and language understood by women.

1.2.9.2. Policy Objectives and Operational Principles of Natural Habitat

- Operational Principle 2: Avoid significant conversion or degradation of critical natural habitats, including those habitats that are (a) legally protected, (b) officially proposed for protection, (c) identified by authoritative sources for their high conservation value, or (d) recognized as protected by traditional local communities.
 - It is not a part of the policy principles to recognize habitats as protected by women of local and indigenous communities.
- Operational Principle 5: Consult key stakeholders, including local non-governmental organizations and local communities, and involve such people in design, implementation, monitoring, and evaluation of projects, including mitigation planning.
 - It is not a part of the principles to acknowledge women as one of the key stakeholders and consult them;
 - It is not a part of the principles to ensure involvement of women in design, implementation, monitoring, and evaluation of projects, including mitigation planning.
- Operational Principle 6: Provide for the use of appropriate expertise for the design and implementation of mitigation and monitoring plans.
 - It is not a part of the principles to use gender expert for the design and implementation of mitigation and monitoring plans
- Operational Principle 7: Disclose draft mitigation plan in a timely manner, before appraisal formally begins, in an accessible place and in a form and language understandable to key stakeholders.

- It is not a part of the principles to disclose draft mitigation plan in a women's friendly manner, in women's accessible place and in a form and language understood by women.

1.2.9.3. Policy Objectives and Operational Principles of Pest Management

- Policy objectives: To minimize and manage the environmental and health risks associated with pesticide use and promote and support safe, effective, and environmentally sound pest management.
 - It is not a part of the objectives to minimize and manage women's health in particular reproductive health risks associated with pesticide use.
- Operational Principles 1: Promote use of demand driven, ecologically based biological or environmental pest management practices (Integrated Pest Management [IPM] in agricultural projects and Integrated Vector Management [IVM] in public health projects) and reduce reliance on synthetic chemical pesticides. Include assessment of pest management issues, impacts and risks in the EA process.
 - It is not a part of the principles to include assessment of pest management issues, impacts and risks to women in the EA process.
- Operational Principles 5: Disclose draft mitigation plan in a timely manner, before appraisal formally begins, in an accessible place and in a form and language that are understandable to key stakeholders.
 - It is not a part of the principles to disclose draft mitigation plan in a women's friendly manner, in women's accessible place and in a form and language understood by women

1.2.9.4. Policy Objectives and Operational Principles of Involuntary Resettlement

- Policy objective: To avoid or minimize involuntary resettlement and, where this is not feasible, to assist displaced persons in improving or at least restoring their livelihoods and standards of living in real terms relative to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.
 - It is not a part of the objectives to specifically assist displaced women including women as the head of the household and single women to improve their lives and livelihoods at involuntary displacement activities.
- Operational Principles 2: Through census and socio-economic surveys of the affected population, identify, assess, and address the potential economic and social impacts of the project that are caused by involuntary taking of land (e.g., relocation or loss of shelter, loss of assets or access to assets, loss of income sources or means of livelihood, whether or not the affected person must move to another location) or involuntary restriction of access to legally designated parks and protected areas.
 - It is not a part of the principles to identify, assess and address the potential gender based impacts and impacts to women and their rights, including women as the head of the household, caused by the involuntary resettlement.

- Operational Principles 5: Inform displaced persons of their rights, consult them on options, and provide them with technically and economically feasible resettlement alternatives and needed assistance, including (a) prompt compensation at full replacement cost for loss of assets attributable to the project; (b) if there is relocation, assistance during relocation, and residential housing, or housing sites, or agricultural sites of equivalent productive potential, as required; (c) transitional support and development assistance, such as land preparation, credit facilities, training or job opportunities as required, in addition to compensation measures; (d) cash compensation for land when the impact of land acquisition on livelihoods is minor; and (e) provision of civic infrastructure and community services as required.
 - It is not a part of the principles to specifically inform displaced women about their rights at resettlement activities, and consult them on options;
 - It is not a part of the principles to specifically provide women, including women as the head of the household, with women’s friendly economically feasible resettlement alternatives and needed assistance.

- Operational Principles 7: For those without formal legal rights to lands or claims to such land that could be recognized under the laws of the country, provide resettlement assistance in lieu of compensation for land to help improve or at least restore their livelihoods.
 - It is not a part of the principles to pay attention to women without legal rights or claims to lands although many facts show that women usually do not own legal rights to land;
 - It is not a part of the principles to specifically provide resettlement assistance to displaced women, single women and women as the head of the household in lieu of compensation for land to help improve or at least restore their livelihoods.

- Operational Principles 8. Disclose draft resettlement plans, including documentation of the consultation process, in a timely manner, before appraisal formally begins, in an accessible place and in a form and language that are understandable to key stakeholders.
 - It is not a part of the principles to disclose draft resettlement plan in a women’s friendly manner, in women’s accessible place and in a form and language understood by women.

- Operational Principles 12: Assess whether the objectives of the resettlement instrument have been achieved, upon completion of the project, taking account of the baseline conditions and the results of resettlement monitoring.
 - It is not a part of the principles that gender disaggregated baseline condition is used to assess achievements of the resettlement instrument.

1.2.9.5. Policy Objectives and Operational Principles of Indigenous Peoples

- Policy Objectives: To design and implement projects in a way that fosters full respect for Indigenous Peoples’ dignity, human rights, and cultural uniqueness and so that they: (a) receive culturally compatible social and economic benefits; and (b) do not suffer adverse effects during the development process.
 - It is not a part of the objectives to respect indigenous women’s dignity and rights in designing and implementing projects;

- It is not a part of the objectives to ensure indigenous women to receive culturally compatible social and economic benefits;
 - It is not a part of the objectives to ensure indigenous women do not suffer adverse effects and violation of their rights during the development process
- Operational Principles 2: Undertake free, prior and informed consultation with affected Indigenous Peoples to ascertain their broad community support for projects affecting them and to solicit their participation: (a) in designing, implementing, and monitoring measures to avoid adverse impacts, or, when avoidance is not feasible, to minimize, mitigate, or compensate for such effects; and (b) in tailoring benefits in a culturally appropriate manner.
 - It is not a part of the principles to respect and uphold the rights of indigenous women to decision-making and decisions in all activities related to the project preparation, design and implementation.
 - Operational Principles 3: Undertake social assessment or use similar methods to assess potential project impacts, both positive and adverse, on Indigenous Peoples. Give full consideration to options preferred by the affected Indigenous Peoples in the provision of benefits and design of mitigation measures. Identify social and economic benefits for Indigenous Peoples that are culturally appropriate, and gender and inter-generationally inclusive and develop measures to avoid, minimize and/or mitigate adverse impacts on Indigenous Peoples.
 - It is not part of the principles to undertake gender analysis on project impacts and risks;
 - It is not a part of the principles to identify social and economic benefits for indigenous women based on gender analysis;
 - It is not a part of the principles to develop measures to avoid, minimize and/or mitigate adverse gendered impacts on Indigenous women.
 - Operational Principles 4: Where restriction of access of Indigenous Peoples to parks and protected areas is not avoidable, ensure that the affected Indigenous Peoples' communities participate in the design, implementation, monitoring and evaluation of management plans for such parks and protected areas and share equitably in benefits from the parks and protected areas.
 - It is not a part of the principles to ensure indigenous women participate in the design, implementation, monitoring and evaluation of management plans parks and protected areas;
 - It is not a part of the principles that indigenous women are shared equitably benefits from the parks and protected areas.
 - Operational Principles 6: Do not undertake commercial development of cultural resources or knowledge of Indigenous Peoples without obtaining their prior agreement to such development.
 - It is not a part of the principles to consider knowledge and experience of indigenous women in undertaking commercial development and to consider women's consent in agreeing sharing of the common indigenous people's knowledge to outside for commercial development
 - Operational Principles 7: Prepare an Indigenous Peoples Plan that is based on the social assessment and draws on indigenous knowledge, in consultation with the affected Indigenous Peoples' communities and using qualified professionals.

Normally, this plan would include a framework for continued consultation with the affected communities during project implementation; specify measures to ensure that Indigenous Peoples receive culturally appropriate benefits, and identify measures to avoid, minimize, mitigate or compensate for any adverse effects; and include grievance procedures, monitoring and evaluation arrangements, and the budget for implementing the planned measures.

- It is not a part of the principles to prepare Indigenous Peoples Plan that is also based on gender analysis, draws on indigenous women's knowledge and experiences, and in consultations with indigenous women;
 - It is not a part of the principles to use gender expert and professional in preparing Indigenous Peoples Plan.
- Operational Principles 8: Disclose the draft Indigenous Peoples Plan, including documentation of the consultation process, in a timely manner before appraisal formally begins, in an accessible place and in a form and language that are understandable to key stakeholders.
 - It is not a part of the principles to disclose draft Indigenous Peoples Plan in indigenous women's friendly manner, in indigenous women's accessible place and in a form and language understood by indigenous women.
 - Operational Principles 9: Monitor implementation of the Indigenous Peoples Plan, using experienced social scientists.
 - It is not a part of the principles to use gender expert to monitor implementation of the Indigenous Peoples Plan.

1.2.9.6. Policy Objectives and Operational Principles of Forests

- Operational Principles 1: Screen as early as possible for potential impacts on forest health and quality and on the rights and welfare of the people who depend on them. As appropriate, evaluate the prospects for new markets and marketing arrangements.
 - It is not a part of the principles to screen the potential impacts to rights and welfare of women who depend on forests.
- Operational Principles 8: Support commercial harvesting by small-scale landholders, local communities or entities under joint forest management where monitoring with the meaningful participation of local communities demonstrates that these operations achieve a standard of forest management consistent with internationally recognized standards of responsible forest use or that they are adhering to an approved time-bound plan to meet these standards.
 - It is not a part of the principles to involve meaningful participation of women of the local communities in monitoring joint forest management.
- Operational Principles 9: Use forest certification systems that require: (a) compliance with relevant laws; (b) recognition of, and respect for, legal or customary land tenure and use rights as well as the rights of Indigenous Peoples and workers; (c) measures to enhance sound community relations; (d) conservation of biological diversity and ecological functions; (e) measures to maintain or enhance environmentally sound multiple benefits from the forest; (f) prevention or minimization of environmental impacts; (g) effective forest management planning; (h) active monitoring and assessment of relevant forest management areas; and (i)

independent, cost effective, third-party assessment of forest management performance against measurable performance standards defined at the national level and compatible with internationally accepted principles and criteria of sustainable forest management through decision making procedures that are fair, transparent, independent, designed to avoid conflict of interest and involve the meaningful participation of key stakeholders, including the private sector, Indigenous Peoples, and local communities.

- It is not a part of the principles to involve meaningful participation of local and indigenous women in monitoring the use of forest certification system.
- Operational Principles 10: Disclose any time-bound action plans in a timely manner, before appraisal formally begins, in an accessible place and in a form and language that are understandable to key stakeholders.
 - It is not a part of the principles to disclose any time-bound action plan in a local and indigenous women's friendly manner, in local and indigenous women's accessible place and in a form and language understood by local and indigenous women.

1.2.9.7. Policy Objectives and Operational Principles of Physical Cultural Resources

- Policy Objective: To assist in preserving physical cultural resources and avoiding their destruction or damage. PCR includes resources of archaeological, paleontological, historical, architectural, religious (including graveyards and burial sites), aesthetic, or other cultural significance.
 - It is not a part of the objectives to consider PCR that is significant for women and their lives.
- Operational Principles 1: Use an environmental assessment (EA) or equivalent process to identify PCR and prevent or minimize or compensate for adverse impacts and enhance positive impacts on PCR through site selection and design.
 - It is not a part of the principles to include a gender analysis to identify PCR.
 - It is not a part of the principles to look the adverse impacts of losing PCR to women.
- Operational Principles 2: As part of the EA, as appropriate, conduct field-based surveys, using qualified specialists.
 - It is not a part of the principles to include gender analysis in the EA.
 - It is not a part of the principles to conduct gender sensitive field-based research and to use gender expert.
- Operational Principles 3: Consult concerned government authorities, relevant non-governmental organizations, relevant experts and local people in documenting the presence and significance of PCR, assessing the nature and extent of potential impacts on these resources, and designing and implementing mitigation plans.
 - It is not a part of the principles to consult with local and indigenous women in documenting the significant of PCR to them.
- Operational Principles 5: Disclose draft mitigation plans as part of the EA or equivalent process, in a timely manner, before appraisal formally begins, in an accessible place and in a form and language that are understandable to key stakeholders.

- It is not a part of the principles to disclose draft mitigation plan in a women's friendly manner, in women's accessible place and in a form and language understood by women.

2. Conclusion:

Gender based social construction creates disparities and inequality between men and women in the family, community and society. This is an existing situation in the global South, and most of these countries are shareholders, members, borrowers and recipients of WB development financing. The situation is worsening because measures to protect women and their rights from impacts and risks of that development financing are not specifically considered, required and provided. In an effort to respond to the gender-based problems faced by women, WB developed a Gender and Development Policy. This policy aims to remove gender disparities and inequality through gender mainstreaming. However, this non enforceable gender policy is not enough to help women out from the disparities and inequality. Without requiring protection to women from impacts and risks of development financing, their situation is just perpetuated. Thus, women, particularly poor rural and urban women, are left out and excluded from the development initiatives/efforts, and a phenomenon of feminization of poverty is increasing.

In summary, an assessment of eight WB Safeguard policies under review resulted in the following findings:

1. OP 4.01 - Environmental Assessment (EA) is gender blind as it does not consider women as a right holder and a stakeholder, and does not require gender impacts and risks assessment of the changing environment or landscape of livelihoods to women in regard to sexual and reproductive health and safety; or gender dimensions in the social aspects; no specific measures are required in the EA to promote women's equal participation decision making and to address a gap that disadvantage women. It fails to recognize gender as an essential determinant of social outcomes.
2. OP 4.04 - Natural Habitats is gender blind and does not have gender awareness because a gender analysis is not required in determining project's substantial benefits. Gender considerations are also not required in the mitigation measures within the project.
3. OP 4.09 - Pest Management is gender blind and does not have gender awareness because it neither requires gender analysis nor covers project impacts and risks to women's sexual and reproductive health.
4. OP 4.10 - Indigenous Peoples considers assurance of project's benefits for indigenous women, but does not have requirements for gender analysis on impacts and risks to indigenous women from proposed activities supported by WB nor gender-disaggregated baseline information is required on demographic, social, cultural, and political characteristics of the affected Indigenous Peoples' communities, the land and territories. Moreover, consultations to indigenous women are not required and indigenous women cultural preference, which is based

on their identity and uniqueness, are not considered in the deliberations of resettlement of Indigenous Peoples;

5. OP 4.11 - Physical Cultural Resources is gender blind and not gender aware because it does not even stipulate a provision to involve women and gender experts in consultations in developing a Term of Reference of EA for impacts of projects on these resources.
6. OP 4.12 - Involuntary Resettlement includes women in the vulnerable groups among those displaced but indicates itself as gender blind and not gender aware. It is not sufficient to mention women as one of the vulnerable groups without providing specific requirements for measures to assist them in dealing with difficult situation triggered by involuntary resettlement activities. This is because the policy does not require an assessment of impacts of resettlement activities to women and their rights nor considers components of women's specific needs; no gender disaggregated baseline data is required for the census and this would trigger women for being left out from receiving compensation and other assistances, and also hinder their involvement in consultations and decision-makings. Moreover, there is no gender sensitive and responsive grievance mechanism is developed for women; nor provision to consider female-headed households.
7. OP 4.36 - Forest is gender blind and is not gender aware because it does not have provisions to include women in meaningful participation in developing a forest standard system; gender potential impacts and risks are not specifically required. Women are not differentiated from the local people, and gender issues and women's rights are not included among the issues for information related to forest that are provided to the Bank for its deliberations and for providing measures to meet project's economic, environmental, and social objectives. Hence, women will be left out from those developed measures.
8. BP 4.37 - Safety of Dams is gender blind and is not gender aware. The dams' potential adverse impacts are assessed through OP/BP4.01 (Environmental Assessment) that does not require gender analysis and considerations to women's rights. Hence, significant and adverse impacts of the dams to women won't be identified and they will be left out from any mitigation measures.
9. OP 4.00 - Policy on Piloting the Use of Borrower Systems for Environmental and Social Safeguards ("Use of Country Systems") adheres to the applicable operational principles set out in Table A1- Environmental and Social Safeguard Policies—Policy Objectives and Operational Principles. Majority of the policy objectives and operational principles are gender blind and not gender aware.

WB current Safeguard Policies under review are mostly gender blind and do not indicate as having gender awareness. Those eight safeguard policies fail to recognize gender as an influencing factor in projects, program and policy; fail to apply gender analysis into projects, programs and policies; fail to recognize that women and men have different needs and power; and fail to provide space for gender equality. This gender blindness of the safeguard policies lead to no requirement to protect women from potential negative impacts associated with Bank lending operations.

3. Recommendations for gender considerations in WB Safeguard Policies Review

WB Safeguard Policies Review is an opportunity to fix this problem of insufficient gender awareness. Based on this assessment, the ongoing WB safeguard policies review should lead to new and better safeguard policies, that are gender aware and gender sensitive, and include exclusive principles to protect women and their rights from its financing operations.

The safeguard policies should also provide requirements of gender considerations, as follows:

As principles of the policy framework:

- Adhere to international agreements, conventions and declarations particularly CEDAW (Convention on Elimination of Discriminations against Women), UN-Covenant on Civil-Political Rights, UN Covenant on Economic, Social and Cultural Rights, UN Declaration on Rights of Indigenous Peoples
- Protection to women their rights and commitment for preventing women from impacts and risks of WB operations;
- Inclusion of gender awareness attitude by acknowledging different experiences of women and men in facing impacts and risks of WB operations; and also acknowledging specific needs of women;
- Differentiation of women and men from people or community in order to be more clear and details about impacts and risks, mitigation measures and assistance tailored to the specific needs, identities and uniqueness of women;
- Acknowledgment to women as one of the rights holder and stakeholders in the community, as an essential determinant of social outcomes;
- Acknowledgement of gender dimensions in the social aspects; and
- Acknowledgment of women as heads of households and women's differential status, experiences, and needs within male-headed households

As policy requirements:

- Gender impacts and risks assessment of the changing environment or landscape of livelihoods to women in regard to health, including sexual and reproductive health and safety;
- Specific measures to involve women in any decision making in regard to environmental assessment, mitigations, resettlement and other development plans;
- Gender disaggregated baseline data and information on demographic, economic, social, cultural, and political status;
- Specific and culturally-appropriate measures to assist displaced local and indigenous women in dealing with difficult situation triggered by involuntary resettlement activities;
- Gender sensitive and responsive grievance mechanism;
- Specific measures to consider female-headed households.

end.