

World Bank Safeguards Review Team
World Bank
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**PAI Submission on World Bank Safeguard Policy Review, focusing on
Environmental and Social Policy 4: Community Health and Safety**

Dear World Bank Safeguards Team:

PAI applauds the World Bank's recent efforts to advance women's reproductive health. The Bank is leading the establishment of the Global Financing Facility for Reproductive, Maternal, Newborn, Child and Adolescent Health, which has the potential to be a new source of financing. The Bank also instituted the Reproductive Health Action Plan 2010-2015. While analysis shows that RHAP implementation needs to be strengthened, it is an important step in the right direction.¹

Given this progress, we are disappointed in the lack of attention to women's health, rights and gender issues in the update of the World Bank Safeguard Policies. Interview data suggests that World Bank-financed projects can have alarming impacts on women's health and rights including increasing sex work, sexually transmitted infections, sexual harassment, intra-household violence, loss of livelihoods, and food insecurity.² To mitigate against these impacts in the future, we encourage the World Bank to adopt a stand-alone Gender and SOGIE safeguard policy as outlined in the Model Gender and SOGIE Safeguard;³ and mainstream gender, women's rights, and SOGIE issues throughout all the safeguards.⁴

We also suggest the following specific line edits to bolster the World Bank's proposed Environmental and Social Policy 4: Community Health and Safety. Adopting these measures would require borrowers to explicitly address sexually transmitted infections, sexual violence and harassment in Bank-financed projects, thereby minimizing negative health and gender aspects of projects on the lives of women and girls in project-affected communities:

¹ IPPF. 2014. [The Scorecard Revisited: Monitoring and Evaluating Implementation of the World Bank's Reproductive Health Action Plan 2010-2015](#). IPPF.

² Bibler, S. & Lauterback, C. 2012. [Gender, IFIs and Food Insecurity Case Study: Zambia](#). Gender Action; Friends of the Earth & Gender Action. 2010. [Broken Promises: Gender Impacts of the World Bank-Financed West-African and Chad-Cameroon Pipelines](#); Gender Action & CEE Bankwatch Network. 2006. [Boom Time Blues: Big Oil's Gender Impacts in Azerbaijan, Georgia, and Sakhalin](#).

³ https://consultations.worldbank.org/Data/hub/files/gender_and_sogie_safeguard.pdf

⁴ <http://genderaction.org/Gender & SOGI Safeguard-What You Need to Know-GA BIC.pdf>

¶19. The Borrower will avoid or minimize the potential for community exposure to water-borne, water-based, water-related, and vector-borne diseases, and communicable diseases **[insert: including sexually transmitted infections]** that could result from project activities, taking into consideration differentiated exposure to and higher sensitivity of vulnerable groups. Where specific diseases are endemic in communities in the project area, the Borrower is encouraged to explore opportunities during the project life-cycle to improve environmental conditions that could help minimize their incidence.

¶20. The Borrower will take measures to avoid or minimize transmission of communicable diseases **[insert: including sexually transmitted infections]** that may be associated with the influx of temporary or permanent project labor.

¶27. The Borrower will make **[delete: reasonable]** inquiries to ensure that those providing security are not implicated in past abuses **[insert: , including sexual abuses and sexual harassment]**; will train them adequately (or determine that they are properly trained) in the use of force (and where applicable, firearms), and appropriate conduct toward workers and affected communities **[insert: during work and non-work]**; and require them to act within the applicable law **[insert: at all times]**.

¶30. The Borrower will **[delete: consider and, where appropriate,]** investigate all allegations of unlawful or abusive acts of security personnel, take action (or **[delete: urge; insert: require]** appropriate parties to take action) to prevent recurrence, and report unlawful and abusive acts to the relevant authorities **[delete: , when appropriate]**.

We appreciate your careful consideration of the above suggestions. Please let me know if you have any questions about our submission, and we welcome the opportunity to speak with you further regarding these suggestions.

Sincerely,

Suzanna Dennis
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