

November 20, 2014

Dr. Jim Yong Kim
President
The World Bank
1818 H St. NW
Washington, D.C. 20433

Dear Dr. Kim,

We write today in order to comment on the World Bank's Proposed Environmental and Social Framework, dated July 30th.

We welcome the inclusion of provisions related to child protection in the safeguard draft. We particularly appreciate the requirement in ESS 1, and the associated annex 1, that social assessments examine the risks that project impacts will disproportionately affect disadvantaged or vulnerable groups, including children. However we believe it is very important to clarify whether impact assessments will be required to look at the unique impacts of projects on children separately from other vulnerable groups or whether a general assessment of how projects impact all vulnerable groups would suffice. We must also take this opportunity to express our very serious concerns about several structural weaknesses with the draft in terms of accountability for compliance with the safeguards, the presence of a number of loopholes allowing borrowers to avoid some safeguard requirements, and a lack of detail in terms of how the safeguards will be implemented.

Because the ways in which children may be affected directly, and indirectly, by development projects vary greatly from the ways in which other vulnerable groups may be affected it is critical that impact assessments be required to look at the unique impacts of projects on children so that any potential negative impacts on children can be prevented or mitigated. Even short periods of deprivation can have long-term effects on children that can severely damage their growing minds and bodies, and can lead to further entrenching the cycle of poverty in their communities. As the World Bank itself has stated, "the economic costs of allowing child and youth deprivation can be enormous."

In addition, ESS 4 (on Community Health and Safety) and ESS 5 (on Involuntary Resettlement) both contain references to the need to pay particular attention to "vulnerable" groups. Vulnerable is not specifically defined in either of these policies, and thus additional clarity is needed regarding whether the same definition of vulnerable groups, incorporating age related vulnerability, from ESS 1 will apply to these policies. Furthermore, as with ESS 1, it is important that these policies ensure that borrowers address the unique needs of children who may be resettled, i.e. access to quality education, as well as the unique health and safety needs of children, i.e. increased risks of sexual exploitation, rather than address all groups deemed "vulnerable" as a single entity.

There is also a need to strengthen ESS 2 (on labor). This provision should prohibit the use of child labor by contractors, and subcontractors, address the risks of child labor in the primary supply chain, and require that the minimum age for work be set in line with ILO conventions, even where these may not be reflected in national law.

Finally, we would like to commend the Bank for the inclusion of several references to the need to engage all stakeholders, regardless of age, in ESS 10 (stakeholder engagement). In particular the requirements that the borrower identify differing interests among stakeholders based on age and consider how vulnerable groups (including minors) might be differentially affected by the project in ESS10 are welcome. The fact that ESS 10 requires that the stakeholder engagement plan describe how barriers to participation, including those based upon age, will be removed is a significant step forward toward ensuring that children are included in consultations about matters that will impact their lives.

Thank you for your time and attention. We are happy to discuss this further or answer any questions you may have at your convenience.

Sincerely,

Endorsing Organizations

Child Helpline International

World Childhood Foundation, International

CRIN - Child Rights International Network, International

Children's Human Rights Centre of Albania (CRCA)

Information Center for Children's Rights in Albania (IRCCRA)

Save the Children Australia

Childhood Brazil

Instituto Promundo, Brazil

National Network for Children, Bulgaria

Cambodian Center for the Protection of Children's Rights (CCPCR)

Cambodian Human Rights and Development Association (ADHOC)

Khemara, Cambodia

Vulnerable Children Assistance Organization (VCAO), Cambodia

Cercle International pour la Défense des Droits de l'Homme, la Paix et l'Environnement en sigle (CIDDDHOPE), Democratic Republic of Congo

International Institute for Child Protection, Gambia

Uzbek-German Forum for Human Rights, Germany

Kelompok Kerja Sosial Perkotaan (KSSP Foundation) – Center for Education and Child Rights Information, Indonesia

Semai Jiwa Aminin Foundation (SEJIWA), Indonesia

Aid Children with Disability Association (ACDA), Laos

Citizens for Justice (CFJ), Malawi

Society for the Protection of the Rights of the Child, Pakistan

Instituto de Formacion de Adolescentes y Niños Trabajadores (INFANT), Perú

Psychosocial Support and Children's Rights Resource Center (PSTCRRC), Philippines

Life Haven, Inc., Philippines

Psychosocial Support and Children's Rights Resource Center (PSTCRRC), Philippines

Enda Tiers Monde, Dakar, Senegal

Mouvement Africain des Enfants et Jeunes Travailleurs (Panafrikan), Senegal

Terre Des Hommes, Switzerland

Defence for Children International, Switzerland

Oak Foundation, Switzerland
Children's Dignity Forum, Tanzania
C-Sema, Tanzania
The Foundation for Human Health Society (HUHESO), Tanzania
Shivyawata, Tanzania
Kiwohede, Tanzania
Shalom Centre, Tanzania
ECPAT International, Thailand
Joy for Children, Uganda
National Council for Children in Uganda
Uganda Child Rights NGO Network
Uganda Children Centre
Generosity International Lifecare Development Coalition, Uganda
Child to Child, United Kingdom
Keeping Children Safe, United Kingdom
Day Associates, United Kingdom
Home-Start Worldwide, United Kingdom
Bank Information Center, United States
Cotton Campaign, United States
International Initiative to End Child Labor (IIECL), United States
Sisters of St. Francis of Philadelphia, United States
International Social Service – United States of America Branch, Inc.
International Labor Rights Forum, United States
SOS Children's Villages International, United States
Humanitarian Services for Children of Vietnam (HSCV), Vietnam
Democracy School, Yemen