

## **Comments by The Netherlands' Task Force on Women's Rights and Gender Equality on the WBG Concept Note Gender Strategy (15 July 2015)**

- We warmly welcome this Concept Note and the World Bank Group (WBG) proposal it contains to develop a new gender strategy. We agree that such a new strategy is due considering developments in the world and the WBG since 2001, when the previous WB strategy on gender was adopted.
- We support the approach proposed in the Concept Note, and specifically:
  - o A more strategic approach ('strategic mainstreaming') to integrate gender equality in operations on the ground (par. 32): country driven, identifying key areas for proposed engagement on the basis of gender assessments, shift to the achievement of impact,
  - o The crucial role attributed to enhancing women's voice and agency, and the need for change in social norms, laws and services across a range of issues,
  - o The increased focus on 1) more and better jobs and 2) greater ownership of, control over and access to key productive assets, as issues where the WBG has a clear comparative advantage.
- We assume that the new gender strategy leads to the reconfirmation of gender equality as a strategic priority for the World Bank Group.
- We welcome that the new gender strategy will cover both the World Bank and IFC, and welcome that opportunities for innovative multi-stakeholder partnerships with governments, the private sector and civil society are explored.
- We also suggest some points for further elaboration or adaptation:
- Although the Concept Note recognizes gender equality as a core development objective in its own right, it would be good to explicitly integrate in the strategy that women's rights are human rights, based on international frameworks.
- At the same time it is good to recognize that structural changes in unequal gender relations generally require changes in power relationships between men and women, even if more equal gender relations in the end are no zero sum game, with men and boys also benefiting from relaxation of too strict gender norms and rules. Also there are many win-win situations, especially in the economic domain, where there is a business case for greater gender equality
- 8. We welcome the practical approach mentioned in paragraph 8. Indeed it is time to move from theory to concrete steps in the field. There is a lot of opportunity to learn from best practices on integration of gender in regular policies.
- 11. Access to finance is a domain where great potential exists to achieve gender equality. We assume it will form part of the gender strategy, building on the many years of experience of e.g. IFC. Tracking the capacities of financial intermediaries to work in a gender-equitable way would be part of the strategy. We recommend inclusion of analyses of the enabling environment for women for access to finance at national levels; for example regulations to set-up a business or bank account. Too often women need their husband's consent or even legal approval to start-up a business. On the other hand women may have less access to land and other assets in local contexts to be able to get microfinance.
- 17. From this paragraph we understand that it is still a challenge for the WBG to move from gender informed action to gender integration in operations. The WBG is not alone in this endeavor: many donors including the Netherlands are working on more practical and result based approaches. The question is how to go from gender assessment and analysis at national levels to action and results based frameworks. May we suggest involving international and local gender experts in all project operations in order to come-up with practical solutions. Also we would like to insist on the collective learning and knowledge sharing process this requires. We would like to point out that there still is a danger to overlook gender in sectors like climate change, water and energy. Women are not only victims of climate change but key change agents to make adaptation strategies work. In the energy sector more attention should be paid to the increasing development gap that means to have access to energy and know how to use it. Women/men who do not have access to energy can not benefit equally from e.g. credit facilities that work with mobile phones.

- The strategy should integrate the important role that safeguards and Corporate Social Responsibility instruments could play in aligning public and private engagement towards lasting poverty reduction and shared security and prosperity. 19. We would like to suggest that the WBG includes a gender focus in the IFC Sustainable Performance Standards and that each operation should include a gender focus in environmental and social risks and impacts assessments and Environmental and Social Mitigation Strategies (ESMS). Since WBG clients are encouraged to apply the ESMS developed under Performance Standard 1 to all their project activities, regardless of financing source, this approach would allow integrating gender further in all WBG operations. As is rightfully mentioned under PS1 Gender is a crosscutting topic such as climate change, human rights, and water, and should be addressed across the multiple Performance Standards. Practical tools and case studies can be developed to do this, the Netherlands wants to be part of this learning and knowledge-sharing road. Specific attention should go to Free Prior Informed Consultation process to make sure the voice of women is heard. The assumption is often that in practicing the FPIC principle women's voices are heard however research indicates that where gender blind texts and assessments and customary law is practiced male voices tend to be unwillingly favored. It is recommended to see how women can be proactively encouraged to participate in decision-making process for example by not only applying a quorum of presence but to reserve seats for active voting as well.
- 24, 25. At country level, the selection of key sectors of engagement should not preclude that all sectoral strategies and projects, i.e. including in non-key sectors, are screened on their gender potential and risks. Likewise, it is important that support to key macro-economic policies is gender-responsive. Gender risk analysis should be a standard requirement at the level of CPFs, sectoral strategies and activities.
- 26. The shift to the achievement of impact should have consequences for the WBG gender targets. Substantial targets for impact on gender equality should be added to the current procedural targets (rates of 'gender-integrated-ness' of activities, projects, programmes or CFSS). Meanwhile, it is observed that the rate of fully gender integrated operations (in 3 dimensions) has stagnated or even gone down in various regions since FY 2013 (Annex 2). This is a worrisome trend that deserves an analysis and specific actions to counter this trend.
- 29/38. May we also suggest including a paragraph on sexual and reproductive human rights (SRHR). You rightfully refer to endowments as a cultural bottleneck for young women to participate in socio economic life, however many girls are denied the right to determine at what age they want to marry and have sex due to customary laws encouraging teenage pregnancies that are not only dangerous from a health perspective but hinder young women in going to school, finish a degree and access work opportunities. To promote jobs for women, female entrepreneurship and opportunities for women asks not only for a thorough country-level and local context analyzes but also for a private public sector strategy to discuss action and address these underlying bottlenecks. Indeed the other issue that needs to be address is domestic burden sharing. Here gender also means including men in domestic tasks and making sure reliable and safe day care facilities are available. Reducing time spend on domestic care has proven to be a good indicator on improving the enabling environment to work for women.
- 30. We support that the strategy builds on the WDR 2012 framework and findings. However, the framework in Figure 2 needs further development into a more actionable Theory of Change that would clarify the objectives, underlying analysis, assumptions and risks, and would substantiate how interventions are expected to lead to expected outcomes. It would be helpful to clarify under what conditions more and better work and better access to assets can be expected to have lasting impact on more equitable gender relations on the ground.
- 34. We agree with more and better jobs for women. From this angle it would be recommended to integrate a gender perspective in the Health and Safety policies recommended in the Voluntary Standards like the IFC Sustainable Performance Standards for due diligence of businesses and investments as well as integration in codes of conducts, grievance mechanisms, collective bargaining systems etc. This boils down to practical questions as where are toilets built, is there enough light to feel safe for women to go there, are women allowed to have enough breaks to attend their personal hygiene, are sanitary napkins made available (the Netherlands has experience with improving labor conditions for women in textile factories in Bangladesh). Businesses need to be made aware of the economic benefit these small investments can make by reducing absenteeism from work of women due to menstruation and personal hygiene.
- Specific attention is warranted for the impact of regional integration processes on the position of women traders. E.g. in Africa the larger part of cross-border trade is handled by women traders.

Without specific attention to their needs, increased regional integration might damage their position.

- More generally, the transition from informal to more formal economies that generally accompanies economic development, implies risks for women who are constrained to working in the informal sector. An analysis and theory of change how to counter these risks for women and e.g. their access to decent jobs and assets are warranted.
- Specific opportunities present themselves in the current trend of certification in global value chains. Where the emphasis of sustainability standards (Fair Trade, Utz Certified, etc.) used to be on ecological sustainability standards, now the approach is broadening to also include social sustainability. Yet, the position of women in global value chains is as yet often insufficiently visible, and much is to be gained here. After all, the majority of poor women work in agriculture, and many also work on commodities that are internationally traded.
- The strategy could include more explicitly the role that civil society, and specifically (grassroots) women's organizations and women's funds, could play in interventions and partnerships, with their deep knowledge of what levers of change are crucial and feasible in a given context. Addressing the multiple constraints women face requires cooperation between public sector, private sector and civil society organizations working with women.
- Monitoring and evaluation of impact on gender equality generally cannot rely solely on quantitative indicators. We suggest that qualitative studies are included in the M&E systems, to tease out the narratives of what works when and why.
- In the paragraphs on operationalizing the approach proposals could be added how leadership, incentives and accountability arrangements could encourage WBG staff across the countries and GP's to work on transformative change in gender equality. Increasing the number of in-house gender experts, also with specific knowledge of sectors and regions, will be a condition to realize the ambitious goals we hope the WBG sets.