

Joint Comments from Accountability Counsel, Bank Information Center, Center for International Environmental Law, and International Accountability Project on the World Bank Group Strategy for Fragility Conflict and Violence 2020-2025 Concept Note

July, 2019

Thank you for the opportunity to comment on the *Concept Note* for the World Bank Group's Strategy for Fragility, Conflict and Violence.

As civil society organizations who support communities affected by development finance, we welcome the development of a World Bank Group (WBG or Group) strategy for Fragility, Conflict, and Violence (FCV). As the WBG increases its lending in FCV countries and contexts, it is critical that the WBG recognizes the distinct challenges and additional risks associated with supporting development interventions in FCV contexts, and includes specific plans to ensure the safety of development stakeholders, meaningful participation of civil society in the identification, design and implementation of projects, and protection of people and the environment.

As it develops its *Strategy* for Fragility, Conflict, and Violence, the WBG must take extra efforts to seek and incorporate views and inputs from communities who are most at risk in FCV situations, or are more heavily represented in FCV contexts, including refugees, persons with disabilities, ethnic minorities, women, and youth. The WBG's *Strategy* on FCV should be informed by Independent Evaluation Group reports, previous WBG research on FCV, and learnings from civil society and academia.

Definition and Application of FCV *Strategy*

We appreciate the *Concept Note*'s acknowledgement of the need for clarity on how FCV is understood and defined, and its commitment to establishing a typology that will account for the differentiated nuances across FCV contexts. As noted, the current Harmonized List of Fragile Situations includes a limited but wide spectrum of FCV contexts that are varied in nature, scope and intensity. We recommend that the draft *Strategy* provide explicit guidance on the differing types of FCV contexts and procedures for how the WBG will address each respectively, including for FCV contexts beyond those identified within the Harmonized List.

As a whole, the WBG is invested in numerous contexts that are prone to and affected by fragility, conflict and violence, including on a subnational level. The draft *Strategy* should provide clarity on:

- What methodology the WBG will use to identify and define FCV contexts, and the role of the current Harmonized List of Fragile Situations in this process;
- How the draft *Strategy* will be applied across the Group's activities and operations; and
- How the definition and application of this draft *Strategy* will adapt to rapidly shifting situations.

Strong Environmental and Social Standards

In FCV contexts, it is critical that the WBG take proactive measures to ensure it does not exacerbate existing tensions and instability, and that risks are properly identified and mitigated through its Environmental and Social Framework, Performance Standards and due diligence processes such that projects do no harm. Flexibility in project design and management should not come at the expense of proper due diligence, adherence to strong environmental and social safeguards, inclusion of all project stakeholders, and strong monitoring, evaluation, and reporting. The draft *Strategy* should outline any supplementary measures required to ensure the full implementation of the WBG's Environmental and Social Framework, Performance Standards and due diligence processes to address the additional challenges of FCV contexts.

Stakeholder Engagement

For FCV contexts in particular, meaningful stakeholder engagement becomes more complicated but also more critical to ensuring that development does not harm, and fulfills the visions and priorities of civil society and communities. The draft *Strategy* should explicitly prioritize and promote the rights of civil society and communities to access information and participate in the identification, design and implementation of projects. Civil society and communities possess legitimacy and local expertise that can contribute to determining key development priorities, bettering the design of potential projects, and anticipating and mitigating adverse impacts. In seeking to strengthen and renew the social contract between citizens and the state, the WBG should ensure that civil society and communities have the opportunity to meaningfully shape development decisions, and to monitor and hold their governments to account.

Where state institutions are weaker and information is less accessible, citizens and civil society may step in to fill roles that might otherwise be filled by the state. Exclusion of critical voices and restrictions on civic space have been recognized among the drivers of fragility.¹ As the Group develops its strategy around FCV, particularly with a focus on pivoting toward prevention, it is critical to identify areas where the WBG can use its leverage and position to support open civic space.

The draft *Strategy* should provide for the WBG to proactively assess and understand the space for civil society to operate and the enabling environment for meaningful participation and consultation, before engaging in an FCV context. Efforts to establish baseline data and information about FCV contexts, including through Risk and Resilience Assessments and through the Systematic Country Diagnostic process, should include assessments of the environment for civic space in terms of institutions, capacity, implementation and legislative restrictions. Strategies and plans for consultations and stakeholder engagement in FCV (particularly Stakeholder Engagement Plans at the project level) will need to take into account these specific contexts. The FCV *Strategy* should also include specific examples of enhanced stakeholder engagement tools and triggers for how and when these tools should be used at the country and project levels.

Currently, the *Concept Note* explicitly focuses on stimulating private sector investment in FCV contexts. Given the vital importance of strong civil society participation and the additional

¹ Fragility Study Group, Policy Brief: *Closing Space and Fragility* (October 2016), available at <https://www.usip.org/sites/default/files/Fragility-Report-Policy-Brief-Closing-Space-and-Fragility.pdf>

obstacles encountered in FCV contexts, the draft *Strategy* should prioritize and address the WBG's role in building and facilitating a safe and open space for meaningful civic engagement in development processes.

Differentiated Focus on Vulnerable Groups

It is imperative that the *Strategy* not only considers the high risk of violence toward vulnerable groups, but also the differentiated impact of violence and conflict on particular groups. However, the focus cannot just be on gender and youth. For example, violence and conflict are a major cause of disability but persons with disabilities are also at a high risk of violence, both interpersonal and conflict-related. The impact of violence and conflict can look different for persons with disabilities, children, women, religious and ethnic minorities, human rights defenders and LGBTI people, among others. The *Strategy* must flesh this out and identify ways to prevent and mitigate the impact of conflict and violence on each group. Gender Based Violence and sexual exploitation risks in particular can look different across FCV contexts, and the *Strategy* should describe how these risks are addressed in the differing FCV contexts. Supports and response to conflict and violence must be holistic. For example, health services should not just focus on physical health, but also on mental health, sexual and reproductive health and address the impact of violence and trauma on psychosocial well-being.

Additionally, disaggregation of data around how FCV affects different groups including women and youth (who are mentioned in the *Concept Note*) but also persons with disabilities, LGBTI individuals, refugees, ethnic minorities, and others is critical.

Climate

Climate change is recognized as an underlying cause of fragility and conflict, whether through extended drought, disaster-induced displacement and migration, or other climate-related impacts on livelihoods, such as shifting crop ranges. With this in mind, climate considerations need to be mainstreamed, both in FCV responses and in planning programs to prevent, reduce, and mitigate FCV. Adaptation to water stress must be addressed, through approaches such as water conservation and recycling. Preventive measures such as the Great Green Wall are an example of the latter.

In many cases, nature-based solutions offer lower-cost solutions that can achieve both adaptation and mitigation goals, such as mangrove conservation and restoration for coastal areas under threat from storms and rising seas. The foregoing is consistent with the WBG's own work (e.g. *Convenient Solutions to an Inconvenient Truth*) and integrating climate with FCV can also contribute to the achievement of the WBG's climate goals.