



Review of the World Bank 2014 Environmental and Social Framework

**LONDON EXPERT ROUNDTABLE
SUMMARY REPORT**

February 2015

Introduction

On January 22, 2015, the International Association for Impact Assessment (IAIA) convened an expert focus group¹ to discuss the World Bank's (the Bank) draft document *Environmental and Social Framework: Setting Standards for Sustainable Development* (the Framework). The overall objective of the meeting was to provide an opportunity for IAIA members to meet directly with the World Bank staff who are leading the review and provide their input on several aspects of the Framework. The Bank is interested in hearing from experts in this field, as this input will help inform and shape the Bank's future policies, standards, and practices related to impact assessment and management. This report is a summary of the discussions during the workshop. It is organized according to the meeting agenda² and captures some but not all of the discussion. It reflects comments and opinions by experts at the workshop and does not represent the views or position of IAIA, nor those of the participants' organizations and institutions.

The proposed Framework sets out the Bank's commitment to sustainable development through a series of documents including a *Bank Policy* and *Environmental and Social Standards* (ESSs). The Policy lays out the requirements of the Bank, whereas the ESSs define the requirements of the Borrowers for projects that the Bank supports through Investment Project Financing. The proposed Framework is an update of the Bank's current Environmental and Social Safeguard Policies, which have not been updated for twenty years. Discussions of the workshop mainly focused on the proposed Policy and ESS1 (*Assessment and Management of Environmental and Social Risks and Impacts*).

Workshop participants were IAIA members located in the London region as well as Northern England. The focus group included experts from many fields of impact assessment including environmental, social, health and strategic. As the Bank had already consulted with government and civil society organizations in London, this meeting mainly included academics and consultants.

The intent of the meeting was not to come to consensus on any points of discussion; rather, participants were encouraged to openly provide their expert opinions on various components of the draft Framework. The Bank was particularly interested in ideas regarding implementation issues related to the proposed standards, to help with refining the framework and to help the Bank consider the necessary guidance materials that will accompany the Framework. As the draft Framework is a lengthy and comprehensive document, it was noted that the overall intent was to give as much feedback to the Bank as possible in the time provided, recognizing that the participants would likely be able to touch on only some of the issues raised. Participants were encouraged to provide their complete reviews and further considerations of the Framework in writing to the Bank directly.

¹ See Appendix I for participant list.

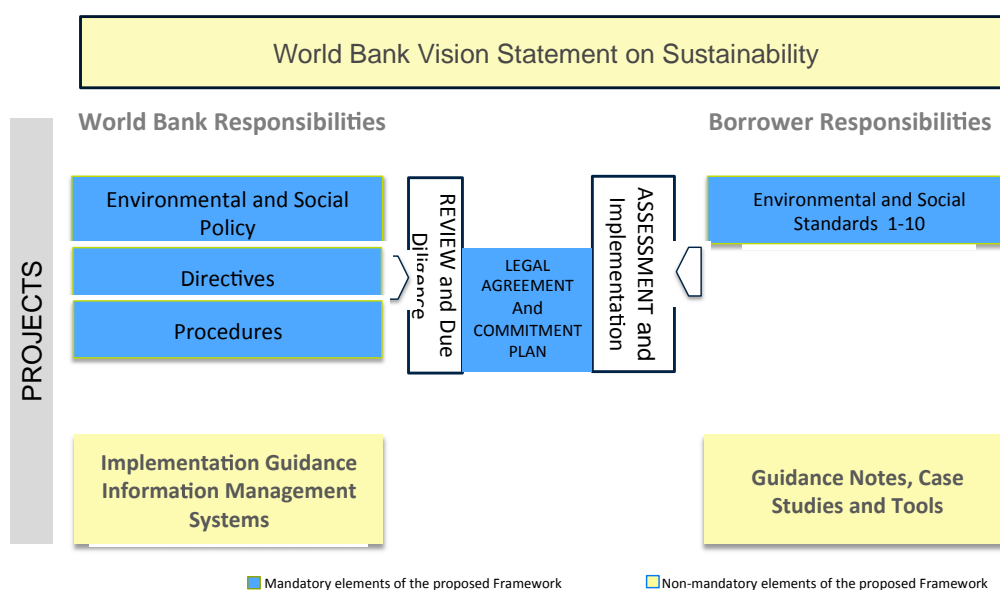
² See Appendix II for agenda.

Environmental and Social Framework: Setting Standards for Sustainable Development

In 2012 the Bank launched a multi-phased process to review and update its environmental and social safeguard policies. On July 30, 2014, the Bank released a draft document—*Environmental and Social Framework - Setting Standards for Sustainable Development*—for consultation purposes.³ The Framework includes (Figure 1):

- A **Vision Statement**, which sets out the Bank’s aspirations regarding environmental and social sustainability.
- The **Environmental and Social Policy**, which sets out the requirements that the Bank must follow regarding projects it supports through Investment Project Financing.
- The **Environmental and Social Standards (ESSs)**, which set out the mandatory requirements that apply to the Borrower and projects, relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the Bank.
- The **Environmental and Social Procedures**, which set out requirements mandatory for both the Bank and the Borrower on how to implement the Policy and the Standards.
- Non-mandatory **guidance and information tools** to support Bank and Borrower implementation of the Policy and the Standards.

Figure 1. Environmental and Social Framework Structure



³ http://consultations.worldbank.org/Data/hub/files/consultation-template/review-and-update-world-bank-safeguard-policies/en/materials/first_draft_framework_july_30_2014.pdf

Presentation by World Bank

Mark King, Chief Officer for Environmental and Social Standards at the World Bank, set the context for the workshop by providing an overview of the Bank's approach to reviewing and updating their Safeguard Policies. He started off by noting that these policies are out of date, as they have been developed one by one over the past 20 years without any updating during this time, culminating in a series of standards that include a mix of values, policies and various guidelines. A goal of the current review process is to refine the Bank's policies into a coherent and systematic framework, providing clear requirements and definitions that will improve implementation and accountability.

Phase I of the Bank's safeguards review process took place in 2012/13, with consultations around the world that broadly identified key issues and areas for improvement with the existing policies. The draft Framework is a result of those consultations. Phase II of the review process, taking place in 2014/15, involves consultations in approximately forty countries on this proposed Framework, with a focus on the proposed policy and ESSs. In this Phase, the Bank is interested in exploring the implementation challenges associated with the Framework, as this will help them develop guidance materials on implementation of the policies.

Mr. King highlighted a number of specific components of the Bank's approach and Framework in his opening presentation:

- The Bank is trying to make the process simpler and more transparent for Borrowers, with clearly defined responsibilities and accountability for the Bank and for the Borrower.
- The existing approach and standards place too much emphasis on front-loading the assessment process. Taking this approach currently requires more information at the front end of the assessment process. From certain perspectives, this is seen as a positive aspect, thereby requiring more information from a proponent before a project is permitted to proceed. However, in some cases the requirements to have a lot of information about the potential impacts of a project are very difficult to determine with much certainty at the onset of a project and the impact assessment; therefore, some proponents do not see this front-loading approach as a positive aspect, resulting in some delays of project implementation. In order to address this situation, the Bank is looking to develop a more flexible and adaptive assessment process, including a risk management approach to some of the impact assessments.
- The Bank's proposed approach is both risk-based and outcomes-focused. This is a significant change in approach for the World Bank, and as such they see a need for capacity building within the Bank to support and implement the proposed Framework.
- Harmonization of the process with other approaches taken by other multilateral development banks (MDBs) is very important; therefore the Bank is trying to align or harmonize its policy and standards with other MDBs as well as other similar institutions such as the International Finance Corporation (IFC).

- The proposed Framework places emphasis on paying close attention to “marginalized people,” and specifically on how these groups could be considered and included in the environmental and social assessment (ESA) process.
- The Bank is proposing to use the Borrower’s country ESA systems as much as possible. This approach could create opportunities for institutional capacity building and may go as far as potentially improving national or regional assessment approaches.

After the consultation period is concluded in February, the Bank will analyze the feedback from the consultations and revise the draft Framework accordingly. That version will be presented to the Bank’s Board Committee in mid-2015. The Bank will then proceed as directed by the Board Committee.

Opening Remarks

Each expert was asked to provide one positive comment on the framework, as well as an area for improvement or further consideration. A summary of responses to this question is provided here, in no particular order of importance.

Positive Aspects

- Participants were all very pleased to see the Bank updating the Safeguard Policies, and noted the positive consultative process underway to consult broadly, as well as holding focus-group workshops aimed at specific areas of concern. The approach taken by the Bank has opened up the debate and discussion of the current safeguard policies, which is a good step for improving the current standards.
- The comprehensive nature of the proposed Framework was seen as a positive aspect.
- The harmonization of the World Bank policies and standards with those of other MDBs, such as IFC, is very welcomed and noted as necessary. This attempt to have a common approach will simplify the assessments and process, particularly for consultants working on impact assessments. It was noted that there is no reference to the Equator Principles and the IFC Performance Standards specifically. The Bank noted that the proposed standards are also intended to align with these IFC Standards. As such, it was suggested that this be explicitly noted in the Framework. The Bank will need to develop some clear guidance or diagnostics for how this harmonization with other standards will occur.
- Many experts like the proposed risk-based approach to projects, as well as the adaptive management approach. The risk-ranking definition and determination of projects is a critical step, so it is very important to ensure these are clear.
- The use of local (the Borrower’s country) regulatory frameworks and impact assessment systems, including local expertise in conducting assessments, is preferred when possible. There was support for the approach whereby Borrowers will be more responsible for implementing the new policies and standards. However, the challenge in doing so is the difficulty in ensuring quality assessments; this will require training and

capacity building for those Borrower countries that need it. Furthermore, to be effective and ensure that the standards are upheld, the Bank will need to have both monitoring and enforcement mechanisms in place to ensure compliance. For example, the Bank needs to consider how it will monitor compliance with the commitments and what measures it will take should a Borrower not respect the requirements and commitments of the ESSs.

- Participants welcomed the emphasis on indigenous and vulnerable peoples in the proposed Framework.

Areas for improvement or further consideration

- One expert noted that the Framework Vision is not clear in its objective, and the Bank was encouraged to revisit this. Specifically, the definition of “sustainable development” can mean different things to different people, and as stated in the proposed standard it is too vague; this could leave it open to suit the interpretation of any Borrower. The Bank needs to be clear on the definition of sustainable development as part of its vision statement.
- The Bank was also encouraged to consider being more aspirational in the vision and objectives of the Framework. As many look to the World Bank for setting the “gold standard” of standards, there exists a real opportunity to uphold this view by striving for the best standards and policies.
- The Bank should clarify some of the language that introduces flexibility on many of the requirements in the front end of the Framework. To improve the clarity around the flexibility offered by the ESSs, it was recommended that the Bank include an upfront paragraph explaining that there will be instances where discretion will be applied. For example, the term “where feasible” currently appear many times in the standards; it is repetitive and in some cases reads as if the Standards are not applicable to all projects. It is not stated clearly that ESS1 applies in all cases. The Bank should try to emphasize that such flexible language is intended to strengthen the Bank’s ability to manage projects and impacts across, and potentially beyond, the lifecycle of a project. The Bank needs to strike a balance between flexible wording in the framework to allow proportionate assessment, whilst not introducing so much flexibility as to introduce uncertainty over what should and should not be assessed.
- There was a lot of discussion on the recognition of the continuing need for capacity building, both within the Bank and in the Borrower countries, in order to deliver on the commitments of the Framework, and particularly the ESSs. As an example, it was noted that when the Bank is evaluating the capacity of a Borrower, this assessment should consider experience and reality on the ground (i.e., comparing what is written in legislation and what implementation and enforcement are like in reality).
- As the Bank finances government projects, there is an opportunity to link strategic environmental assessments (SEAs; including institution-centered SEAs) with project ESAs (Environmental and Social Impact Assessments or Environmental, Social and Health Impact Assessments). The Bank could consider bringing SEA into the front end of the financing process for larger, longer-term projects. If the Bank were to do this, there

would be a need to develop guidance on how to link the SEA of a region or country with those of project ESAs.

- Health in general, and health impact assessment in particular, should be emphasized more in the Framework, and should be integrated into ESS1. Capacity building of expertise within the Bank on health impact assessment will be necessary.
- In developing guidance documents, the Bank should focus on the scoping approach to developing Terms of Reference (ToR) for ESAs, as the ToR sets out the rest of the process, ultimately affecting the efficiency and effectiveness of the review process.
- With consideration to capacity building within Borrower countries, the Bank should also consider the governance capacity (decision-making) of a government and how the Bank can support and strengthen this critical aspect of the project.
- Having common terminology going forward will help ensure clarity around the policy and ESSs.
- Providing information on how the proposed Framework links up with other Bank activities will be helpful to see the bigger picture.
- The Framework places emphasis on the mitigation of the potential negative impacts of projects. Many experts would like to see the Bank be more aspirational in their approach, focusing both on mitigation of negative impacts and enhancement of positive impacts, and in addition, in relation to mitigation, encouraging Borrowers to be more creative and wide-ranging in the kinds and types of mitigation approaches developed and implemented.
- The framework should ensure transparency and legitimacy of decision-making, and this is particularly critical in taking decisions on screening of the risk level of a project. The Bank needs to clearly articulate how they will determine the risk level, and be clear about the communication of this evaluation. Once the risk-determination is made on a project, it would be helpful to have illustrations that show the next steps in the process (e.g., once a project is determined to be 'high' risk, then what are the next steps in the evaluation process?).
- Data requirements for impact assessments and risk management are critical. Data availability is a significant issue in conducting assessments, and it is often weak, unreliable, or not verified. The Bank should aspire to establish data standardization, and then to make all data (where possible, taking account of commercially, socially or politically sensitive information) associated with Bank projects freely available and publicly accessible.
- Some experts would like to see how the ESSs can be extended beyond the project into post-project phases such as decommissioning/post-decommissioning, as well as a discussion of the extent they may create legacy issues beyond the life of the project. e.g., social and economic changes, chemical contamination.

- The Bank should be more explicit on the issue of climate change mitigation and adaptation and provide more guidance on this issue regarding expectations of the Bank in including climate change into ESAs.
- The Framework states that the ESAs should be integrated. Experts supported this approach and further encouraged the Bank to ensure that assessments are required to identify and examine greater integration and synergies between different types of those impacts that tend to be weakly represented in decision making (e.g., linkages between impacts on biodiversity and social impacts).
- Overall, there was encouragement for the Bank to develop clear guidance around the application of the framework.

Guidance on Scoping

The ESS1 should be detailed in its approach to the scoping of assessments, as this sets the stage for the rest of the assessment process. The group was asked to provide initial ideas on good scoping practices when the Bank is considering the ToR for an ESA. Guidance and best practices on scoping exist; however, it is recommended that the Bank develop scoping guidance for the new ESSs.

During this part of the workshop, experts were asked to describe some of the more important features and considerations in the scoping process. The experts divided into two groups to discuss and came up with a number of considerations.

Group 1

- While the process of scoping an assessment starts early in the project cycle, it should be considered an iterative process that should be revisited throughout the entire life of a project.
- The scoping process is not just about what to scope “in” but also what to scope “out” of a project assessment, in order to have an assessment that is focused on what matters. The level of knowledge and information about a project and the surrounding areas/communities often influences the scope.
- In the scoping phase, the proponent needs to clearly explain the rationale for decisions of scoping an issue “in” or “out.” Related to this, as issues are scoped out at the outset, it may be necessary to identify ‘triggers’ that will bring an issue back into the scope later in the process.
- The scoping process could be a team effort, allowing for different perspectives. This could be accomplished through the use of workshops as a tool to scope a project; good facilitated workshops can greatly assist in making decisions that are thought out and considered. Having experienced personnel involved in scoping can make a significant difference in the outcome. The Bank may consider developing accreditation for its review staff, as well as providing expertise to those Borrowers who are working on ESAs for the first time.
- The scoping process should be considered a dialogue between the Bank and the Borrower. Furthermore, it is important to include external stakeholders in the scoping process both because their engagement can influence the scope of an assessment, and also because the assessments are often complex with many potential interacting components.
- A number of tools can be used in scoping, to help with determining knowledge gaps as well as the different levels of uncertainty associated with potential issues to scope in or out of an assessment. Tools include flow charts, checklists and use of a “red flag” system for identifying key issues. In defining the scope, the use of checklists is good, but these should include open-ended questions that prompt the evaluators to think about and justify their decisions.

- During the scoping phase, issues should be categorized according to risk or level of uncertainty related to knowledge about the issue.
- The Bank may consider the level of information and detail required by the scope of a project based upon the risk determination of the project. For example, for high-risk or moderate-risk projects, the scope of assessment may necessitate a greater level of detailed information in the ESA.
- The use of previous experience and knowledge can be extremely important when it comes to scoping. The Bank, once it has completed a number of assessments, could create case studies—including risk rating evaluations, ESAs, and other assessments and evaluations across the project lifecycle—for use as reference material for future projects.

Group 2

- The risk determination of a project should be linked with the scoping phase, as it should directly influence the level of scoping detail. For example, for lower risk projects, a more basic scoping process may be acceptable, in comparison with higher risk projects where a more complex and thorough approach to scoping should be required.
- The group outlined some of the basic considerations in scoping: time frames, baseline information and information requirements, key challenges, and the scoping summary.
- For the time frame of the scoping phase, the group suggested that this phase would vary from project to project and would be determined by many factors.
- In collecting the baseline information, the Borrower should consider:
 - Information requirements of the Bank (the Borrower must ensure that the scope covers all requirements in ESS1 and all other ESSs that are relevant to the project; this could be assisted by having a scoping checklist directly linked to the ESSs).
 - Availability of information, and the reliability of that information.
 - Conducting a gap analysis (what information are you missing?).
 - Local capacity and resource available for the scoping phase.
- The scoping summary should focus on the most important issues related to a project, inclusive of environment, social, and health, and should clearly articulate and justify why issues are included and excluded.
- Stakeholder engagement at the scoping stage is critical; scoping should not be just a desktop exercise and should involve engagement with locally affected communities.
- As noted by Group 1, it is important to document the decisions taken in the scoping exercise and to justify the scoping at the end of the process. The justification is strengthened if a team rather than an individual takes responsibility for the final scoping decisions.

Social Impact Assessment and Management Aspects

The Bank has proposed a detailed list of those considerations that could be taken into account in the social impact assessment in ESS1. The roundtable discussion started with observations of the draft text related to what is included in “social risks.”

When assessing the social aspects of a project, there is need to strive to achieve a balance of presenting both the negative and positive aspects of a project. While it is important to clearly identify and articulate the social risks of a project, the evaluation should also discuss the social benefits throughout the project cycle. However, in doing so lies the challenge to the Borrower/project proponent of not raising community expectations for jobs and economic benefits beyond what is realistic. Creating false expectations may result in the creation of a wish list of social and economic expectations that a proponent cannot, nor should not, be expected to deliver. In identifying the social benefits of a project, the assessors need to be careful to not present them in such a way that they are perceived more as public relations or selling the project. To avoid these pitfalls, and to achieve a balance of presenting positive and negative impacts and risks, one expert suggested having a consistent approach in addressing both; i.e., creating standards for assessing the positive impacts in the same manner as the negative ones.

The front end of the Framework discusses the Bank’s desire to have “integrated” assessments. In redrafting the policies, the Bank should ensure that social should be assessed in same manner as environment, thus moving the Bank closer to its goal of integrated assessments. Experts noted that there is a need to mainstream the assessment of social impacts into the practices of the Bank, and furthermore, that the Bank should better integrate community health impacts into ESAs. However, integration needs to be approached in a cautious and reflective manner, as it may also lead to weaker assessment aspects becoming hidden.

The Bank should consider adopting the World Health Organization’s definition of health, which is broader and more aspirational than the biophysical one that is often used. This focuses on both the environmental (air, water and soil pollution) as well as the social determinants of health impacts and risks (i.e., how employment, social capital and community cohesion, faith and culture, education can all be affected by a project and in turn lead to community health and wellbeing impacts). Building on this point of the definition of health and the assessment of human health impacts, it was suggested that the assessment of health impacts and risks on workers should go beyond on-site and immediate off-site health and safety to include consideration of potential wider off-site health issues. This includes the potential, e.g., of increased alcoholism and drug use in a nearby community. It also includes the potential impacts on distant communities, e.g., through migrant workers going home to remote communities and generating the potential for the transmission of diseases to those distant communities that would otherwise not be directly affected by a project.

Related to the desire to move toward integrated assessment, experts encouraged the Bank to think of ESA as a “system” that is iterative. With the proposed use of an adaptive management approach, there would be a call for monitoring, evaluation and adjustments, as necessary, to ensure the achievement of the desired sustainable development outcomes.

The Non-Discrimination Principle

The proposed Framework includes the principle of non-discrimination to prevent disproportionate impacts of the project in situations where disadvantaged and vulnerable groups are more likely to be adversely affected by a project's impacts, less able to take advantage of project benefits, and/or excluded from or unable to participate fully in the mainstream consultation process. The Framework provides a lengthy list of characteristics that may be used in defining "disadvantaged and vulnerable groups," such as age, gender, ethnicity, religion, physical or mental disability, social or civic status, sexual orientation, gender identity, economic disadvantages or indigenous status. The focus group discussed the definition as well as the issues associated broadly with the implementation of this principle.

The group noted that the principle itself is good, and having a policy related to it is positive. However, the challenge is in its implementation (i.e., putting it into practice on the ground.) First and foremost, in many cases a significant challenge exists in the identification of potentially disadvantaged and vulnerable groups in many cases. At a high strategic level, the Borrower may be able to do some of this identification through the country diagnostic for characteristics such as age and gender. However, a real challenge lies where the defining characteristic is not evident, such as with sexual orientation.

Second, related to this challenge is the possibility of making the groups or individuals even more vulnerable through such a process of identification. In other words, the association of a particular characteristic with a group make these groups even more vulnerable and at risk to further discrimination and/or harm.

Workshop participants discussed the issue of how to define "proportional impacts" as proposed in this principle. As drafted, the assessment must not only identify the groups potentially negatively affected, but it must also be able to quantify those impacts. It is not clear how this could be conducted.

In conclusion, if the Bank is to keep this part of the ESSs, experts encouraged the Bank to clarify the definition and description of the term "disadvantaged and vulnerable groups," as well as developing guidance on how to apply the principle in practice. Whatever approach is adopted, it should be flexible and able to adapt to different situations. If the Bank decides not to keep this principle in the ESSs, the group suggested that the Bank look to addressing this important consideration through other avenues as part of the broader project management cycle (e.g., deal with it as part of the grievance process or project audits).

Use of the Borrower's Environment and Social Framework

Under the proposed framework, the Bank will review the Borrower's environmental and social framework to determine its equivalency to the Bank's own framework. Depending upon this evaluation, the Bank may permit the use of all or part of the Borrower's framework, providing such use will enable the proponent to achieve objectives consistent with the ESSs. The expert focus group was asked for advice on how the Bank could approach the analysis of a Borrower's Framework.

In starting this work, the Bank staff need to understand what makes a good ESA/SEA system and in what contexts. Workshop participants noted that some guidance exists for good impact assessments and that they would be able to provide the guidance to the Bank. The Bank could look to international principles for what constitutes a good ESA/SEA system, and if those principles exist do not meet the needs of the Bank in specific contexts, then the Bank staff could consider asking IAIA to support the Bank in developing them.

As a first step in evaluating a country's system, the Bank should conduct a gap analysis to look at various aspects such as:

- Does the Borrower's framework line up with the requirements of the ESSs?
- Will the framework deliver on the ESS requirements?
- Does a country have the capability and capacity to achieve the outcomes (e.g., enforcement of mitigation measures)?

This analysis cannot be just a paper exercise, and not just a comparison of legal and regulatory frameworks. There should be a step that includes verifying the gap analysis on the ground, particularly when confirming capacity and capabilities.

The Bank could consider developing a system of "scoring" a Borrower's system and the country's competence and capacity. This could create the opportunity for the Bank to identify weaknesses and then strengthen the country's system through some capacity building program.

In some cases, the Bank could take into consideration any prior projects in a country that may have set precedents for new projects in the country; as a minimum, the Bank should try to use lessons learned from previous experiences. To assist in this, the Bank should look to developing programmatic follow-up programs that will enable adaptive management to be effectively integrated into assessments and project cycles.

On the point of ensuring capability and competence, it was noted that the Bank should develop and implement a quality assurance program, to ensure that those conducting the assessments and those reviewing them (within the Bank) are qualified. One recommendation was to look at the Institute of Environmental Management and Assessment's (IEMA) EIA Quality Mark program⁴ as an example.

⁴ The EIA Quality Mark provides registrants a benchmark for their EIA activities and allows them to demonstrate their commitment to effective practice. See <http://www.iema.net/eia-quality-mark> for details of this program.

Experts discussed briefly who might be best positioned to conduct the assessment of the Borrower's framework. One option is to have the Borrower demonstrate that the country's environmental and social framework will be sufficient and meet the objectives of the Bank's framework. If such an approach is taken, experts discussed the need for the Bank to provide guidance on how to conduct the review. This review would need to be evaluated by the Bank, which could include interviews to ground-truth what the government/Borrower provides in its evaluation.

As a final note on this subject, participants noted that the comparison of frameworks should take place after the concept phase of the project, but before the scoping stage. This timing would allow the Bank to link the evaluation of a Borrower's framework with the Bank's risk determination of the project.

Achievement of the Stated Goal of Sustainable Development

To conclude, the workshop participants were asked to review a statement in the Framework that relates to the objective of sustainable development and to comment on this statement. In addition, participants were invited to make concluding remarks. A few of those are noted here.

Framework statement

While this Framework will not by itself guarantee sustainable development, its proper implementation will ensure the application of standards that provide a necessary foundation for that objective, and provide a leading example for activities outside the scope of Bank-supported projects.

Several participants agreed that it is dangerous for the Bank to attest that implementation of the Framework will guarantee sustainable development. More broadly on this point, participants cautioned against using language that says the Bank "will ensure" anything, as this is very problematic. The participants recognized that the above statement does not directly say that the Framework will guarantee anything, but saying it "will not by itself guarantee" suggests a statement of certainty towards this goal. Participants cautioned against using language that would make promises of *achieving* sustainable development for a country through any individual project. They suggested using language along the lines of "the Framework will implement measures that contribute to a country's efforts to transition towards sustainable development."

One participant suggested that the Bank use language such as "green growth" and look for opportunities for positive change through this process and framework, not just for reducing negative impacts. If possible, the Bank should take its focus away from just projects and their impacts in order to address capacity building, sustainability over the life of the project, and the potential for creating positive legacy opportunities as well.

As noted a few times in the meeting, the focus of the framework should be on the design and implementation of a management system rather than solely on the assessment of project impacts. Related to this was a discussion of the concept of promoting "integrated" assessment, as recognized as a goal at the beginning of the Framework. As a concept, the idea of integrated assessments is laudable and aspirational, but it will be more difficult to

implement on the ground, especially in situations where the Bank becomes involved in projects later in the project cycle (i.e., a project is underway when Bank financing is provided and policies must then be followed). For these cases, the Bank should look at the range of tools or vehicles that could be used for managing potential impacts; this is where an adaptive management approach could become very helpful.

On a different point, some experts noted that they liked the wide definition of the “alternatives” that is proposed in the framework. The Bank is encouraged to think a bit more about its expectations in terms of assessment of alternatives and the extent to which they would be interpreted and implemented by Borrowers.

ESAs are often viewed as a cost to a project, both in terms of delays of development and financial implications. It was suggested that, in order to build support for the ESA process, the Bank should consider including more language at the front end of the framework that demonstrates the value of these assessments, and the ESSs in particular.

One expert noted that no attention is given to “corridor effects” in the standards. There was also a suggestion that more emphasis should be placed on including potential trans-boundary effects associated with certain projects.

One participant observed that the vision statement and the overall goal of the Bank’s Framework are not well defined. The vision statement wanders, leaving much scope for interpretation. The Bank is advised to reconsider the opening vision statement and objectives, with a view to provide clarity and to perhaps be more aspirational.

One participant noticed, and the Bank confirmed, that the proposed Framework and ESSs would apply only to projects that the Bank supports through Investment Project Financing, and that other parts of the Bank relating to technical cooperation and advisory services will continue to use the old Safeguard Policies. A caution was raised about having multiple standards, and the Bank was encouraged to have one set of ESSs for all Bank projects and operations, as this would help prevent confusion among stakeholders.

The workshop experts viewed the Bank’s review process as very valuable and positive. Experts were encouraged to see that the draft Framework, including the ESSs, is still a work in progress, and that the Bank is open to amendments and ideas to improve it. The opportunity to meet with Bank staff was welcomed, and participants were encouraged by the effort to hear and understand various perspectives.

Next Steps for the World Bank

Beyond the governance steps associated with the approval of the next version of the proposed framework, the Bank will be considering a number of next steps in its implementation of the environmental and social assessment framework, including:

1. Developing of an accreditation system for Bank staff, to ensure that staff have the knowledge and training to complete the reviews competently.
2. Conducting training programs for Bank staff on impact assessment.
3. Conducting training programs for the Borrowers on impact assessment.
4. Developing a system for conducting an assessment of the Borrower's ES framework; involved in this will be a detailed methodology of how to benchmark country frameworks against the Bank's new ESSs.
5. Conducting a few pilot evaluations of country frameworks against the Bank's proposed framework.

Appendix I – Participant List

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Appendix I – Workshop Agenda

- 9:00 – 9:05 Welcome (*Rob Evans, Arcadis*)
- 9:05 Meeting Overview and Introductions (*Jill Baker, IAIA*)
- 9:05 – 9:35 Opening Comments & Presentation of the Proposed World Bank Framework (*Mark King, World Bank*)
- 9:35 – 10:30 World Bank Framework and the Bank Policy
- 10:30 – 10:45 Break
- 10:45 – 11:30 Design of Environmental and Social Assessment to achieve the objectives of the Framework
- 11:30 – 12:15 Social Assessment & Management Aspects of ESS1
- 12:15 – 13:00 Lunch
- 13:00 – 14:00 Social Assessment & Management Aspects of ESS1 (continued)
- 14:00 – 15:00 Use of the Borrower’s ES framework under the proposed ESS1
- 15:00 – 15:45 Break
- 15:00 – 15:30 Final Question re: achievement of sustainable development goals
- 15:30 – 16:00 Wrap-up, Next Steps and Closing Remarks (*Mark King and Jill Baker*)

Report prepared by Jill Baker.