

March 10, 2014

Dr. Sanjay Pradhan  
Vice President, Change, Knowledge and Learning  
World Bank Group  
1818 H Street NW  
Washington, DC 20433

Dear Dr. Pradhan:

The new World Bank Group Strategy recognizes that inclusion and citizen engagement are central to the development process. To make this recognition a reality, we believe that civil society organizations and communities should have a voice in all stages of the development process, including upstream decision-making, when the Bank is making choices about how to engage in each borrowing country.

As we understand, the World Bank's future programming for each country will be determined through a two-part process. First, a "systematic country diagnostic" (SCD) will identify the most critical constraints and opportunities for poverty alleviation in each country. Based on this analysis, the Bank and borrowing government will then negotiate a "country partnership framework" (CPF) that will select a few transformative investments where the Bank can engage. It is our hope that this approach will be successful in identifying investments that have positive development outcomes, while avoiding activities that carry adverse impacts.

The World Bank has already indicated that public consultations will play a role in the development of the new SCD/CPF policy, as well as in each country's SCD/CPF. As you know, the effectiveness of consultations often lies in the details of their design. With this in mind, we recommend the following:

1. **Ensure that consultations on the new policy are inclusive of stakeholders in developing countries.** While designing the new directive, it is extremely important that the Bank consult with those who would be directly affected by the new CPF framework, including civil society in developing countries. Accordingly, we request further details on how the Bank plans to notify stakeholders in developing countries of the SCD/CPF consultations and seek their input.
2. **Ensure minimum standards for public input for each SCD.** We request that there be minimum standards to ensure public input for each SCD, as this diagnostic will set the framing of the CPF. This would include informing the public before an SCD takes place, providing details of the process before consultation begins, and providing a means for citizens to submit written input directly to the Bank during each SCD. It should also include specific outreach, including to indigenous peoples, women, persons with disabilities, ethnic minorities, sexual minorities, and others who face discrimination or marginalization, to ensure that consultations are sufficiently broad-based and that important perspectives are not left absent from

the analysis. While citizens should have an opportunity to provide input, we recognize the Bank would retain the final decision of what is included in the SCD.

3. **Ensure that the SCD explicitly includes a risk assessment of human rights, environmental, corruption, and governance conditions.** To be of value, the SCD should provide the World Bank with a frank assessment of the country context in which it will operate. So far, we have heard no indication that risk assessment will be part of the SCD. As you know, the manifestation of the above noted risks often acts as a serious constraint to poverty alleviation. It is critical therefore that these risks are assessed during the SCD rather than later in the process. Numerous tools, such as Strategic Environmental and Social Assessments, currently exist to support this type of assessment.
4. **Adopt a CPF consultation process that is more robust than the one currently used for Country Assistance Strategies.** The Bank has indicated that CPF consultations will be modeled on the current approach used for Country Assistance Strategies (CAS). In our experience, the quality of CAS consultations is often poor. We request that there be minimum standards to ensure meaningful public input into each CPF. This includes, but is not limited to:
  - Informing the public before a CPF consultation takes place.
  - Sharing relevant materials in local languages prior to the consultations.
  - Ensuring that consultations are open to the public and not by invitation only.
  - Proactively reaching out to marginalized sections of society to ensure culturally appropriate opportunities for input and consultation are provided to them.
  - Providing a means for citizens to submit written input.
  - Publishing a record of what stakeholder input is received and how it is taken into account.
  - Encouraging borrower governments to authorize the disclosure of final CPF drafts at the same time they are sent to the Board for approval.
5. **Disclose the interim SCD Guidelines and other key documents prior to the consultation.** We understand that the World Bank will hold consultations on the new CPF approach in March or April, but there is no clear commitment to consult on the SCD. Because these two processes are closely linked, we request that the scope of the upcoming consultations cover both the SCD and the CPF. As part of this, we ask the Bank to disclose its interim SCD guidelines prior to the consultation.

We thank you for taking the time to consider these points and look forward to engaging in more depth on these issues once the Bank has released drafts for public consultation.

Sincerely,

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