

August 31, 2011

Mr. Robert B. Zoellick
President
The World Bank
1818 H Street, NW
Washington, DC 20433

Dear Mr. Zoellick,

The World Bank announced in October 2010 a two-year process of revision to update and improve the ‘safeguard policies’ of the Bank. As we have heard little more in the intervening time period, the undersigned organizations would like to take this opportunity to share with you, respectfully, our views on the upcoming review process and its potential outcomes.

Key in our minds is the influence that the World Bank has not only on the actions of borrower countries, but on safeguard systems and processes throughout the world. The changes introduced in the review are likely to have major impacts for years to come on the environmental and social sustainability of Bank and Bank-supported operations, and on development lending more widely.

We welcome the Bank’s decision to review its safeguard framework, which is out of date, contains major gaps and inconsistencies in a number of critical areas, and does not reflect the significant evolution of relevant international law, policy, and practice in recent years. This review is overdue.

Bank management has assured civil society on a number of public occasions that the Bank will not dilute the current safeguards during the review, and we agree that there must be no weakening of safeguards during this process. However, given the shortcomings of the current safeguard framework, the Bank’s commitment merely not to dilute the current safeguards is necessary but certainly not sufficient for affected people or the environment. It is our view that there must be a clear statement from the Bank that the safeguards will be:

- **Strengthened.** The existing safeguard policies and procedures must be strengthened to provide, at a minimum: consistency with international laws, standards, and norms,¹ and with best international practice; and levels of protection and operational detail sufficient to prevent harm to affected people and the environment and to ensure the sustainability of Bank operations. For example, the Indigenous Peoples policy lags behind the rights recognized in multiple human rights instruments, including the 2007 UN Declaration on the Rights of Indigenous Peoples, which has been endorsed by the UN General Assembly. The Bank’s policy on Indigenous Peoples should remain a stand-alone policy and should be updated to reflect the provisions of the UN Declaration and other human rights standards pertaining to indigenous peoples, including a free, prior and informed consent requirement. Similarly, strengthening is needed on key issues in all of the safeguards.
- **Expanded.** Additional safeguard policies and procedures are needed to address key gaps in the current safeguard framework. This includes explicit, systematic attention to human rights, labor rights, gender equality and women’s rights, rights of people with disabilities, land rights, ecosystems and their values, and climate change mitigation and adaptation, among others.
- **Applied comprehensively.** It is essential that robust safeguards are applied to all forms of lending, including development policy lending, program for results lending, and in the use of country systems. Accordingly, these and all other relevant lending reforms should be included

¹ In particular, safeguards should recognize and ensure the implementation of borrowing governments’ obligations under international law, including the environmental and human rights treaties they have ratified or endorsed.

in the safeguard review. Moreover, policies that significantly impact application of the safeguard policies, but are not considered safeguard policies – for example, policies on project appraisal and project supervision – should also be evaluated publicly during the review.

- **Fully implemented.** Consistent with recent reports from the Bank’s Independent Evaluation Group, the Bank needs to strengthen its staff and management incentive structures to reward effective safeguard implementation and address long-standing weaknesses in monitoring and supervision, including the “culture of approval.” Strengthened arrangements are likewise needed to ensure improved implementation of safeguard policies by governments.
- **Clarified.** The results of this review must provide clarity regarding the mandatory nature of the requirements contained, and the actor to which the requirements pertain, highlighting the responsibilities of Bank staff and of borrower institutions or States. Further, in the case of country systems, the approach must be defined to include consideration of the roles and rights of local communities in these systems, including participation in ‘equivalency assessments.’
- **Designed for accountability.** The review of safeguards must result in strengthened public accountability of the Bank, including improved procedures for the provision of redress to affected communities and citizens with grievances relating to World Bank projects and programs and shortcomings in government implementation.
- **Grounded in experience.** The design of a revised safeguard system must learn lessons from past Inspection Panel investigations, CAO audits, IEG reports, sector reviews and policy implementation evaluation regarding measures necessary to improve due diligence, safeguard implementation and development effectiveness.

Given the many critical issues at stake in the upcoming review, it is essential that the review proceeds in an **appropriate timeframe** that recognizes the urgent need to strengthen and expand the Bank’s inadequate safeguard framework, yet also provides for **systematic and meaningful consultation** with southern and northern civil society, indigenous peoples, and the full range of stakeholders and rights holders who have an interest in the safeguard review.

- We call on the Bank to engage in public consultations to determine the key parameters of a two-year review process, including the scope of the review and the schedule of draft papers, consultations, and decision points. Based on these consultations, the Bank should produce a paper that clearly describes the process to be followed during the review, including at least two full periods of public review and consultation.

Historically, among international development and finance institutions, the World Bank has led the way on the development of strong safeguard policies. Yet in the last decade, there have also been attempts to water-down safeguards, or to limit their applicability. Thus, we view the upcoming safeguard review as a crucial test for the Bank. Our networks expect the Bank to pass this test by adopting highly protective safeguards that raise the bar for the international community and challenge other finance and development institutions to strengthen their own standards.

Finally, we would like to request a meeting with you in the near future to discuss these issues. Many of our organizations have worked constructively with the Bank on safeguards issues in the past, and we look forward to working with you now to achieve a successful safeguards review.

Sincerely,

Signatories as of August 31, 2011:

<i>Organization</i>	<i>Country</i>
ActionAid International	International
Earthrights International	International
Oxfam International	International
International Trade Union Confederation	International
Witness	International
Women Organizing for Change in Agriculture and Natural Resource Management (WOCAN)	International
Africa Freedom of Information Centre	International - Africa
African Rivers Network	International - Africa
Association des Femmes Africaines pour la Recherche et le Développement (AFARD)	International - Africa
Civil Society Coalition on the AfDB	International - Africa
Asia Indigenous Peoples Pact (AIPP)	International - Asia
NGO Forum on AsDB	International - Asia
Global Network Latin America	International-Latin America
IndyACT - The League of Independent Activists	International-MENA/Europe
Centro de Derechos Humanos y Ambiente (CEDHA)	Argentina
Oxfam Australia	Australia
ECA Watch Austria	Austria
Global responsibility – Austrian platform for development and humanitarian aid	Austria
Koordinierungsstelle der Österr. Bischofskonferenz f. internationale Entwicklung und Mission (KOO)	Austria
Oil Workers' Rights	Azerbaijan
Initiative for Right View	Bangladesh
Jagrata Juba Shangha (JJS)	Bangladesh
Solidarity Workshop	Bangladesh
Voices for Interactive Choice & Empowerment	Bangladesh
World Assembly of Inhabitants (WAI)	Bangladesh
11.11.11- Coalition of the Flemish North-South Movement	Belgium
CNCD-11.11.11	Belgium
European Network on Debt and Development (Eurodad)	Belgium
FERN	Belgium
Asociación Prodefensa de la Naturaleza (PRODENA)	Bolivia
Central de Comunidades Nativas de Selva Central (CECONSEC)	Bolivia
Centro de Estudios Aplicados a los Derechos Económicos Sociales y Culturales (CEADESC)	Bolivia
Confederación de Pueblos Indígenas de Bolivia (CIDOB)	Bolivia
Liga de Defensa del Medio Ambiente (LIDEMA)	Bolivia
Puentes Entre Culturas	Bolivia
Amigos da Terra-Amazônia Brasileira	Brazil

Ecologia e Ação (ECO A)	Brazil
Instituto de Estudos Socioeconômicos (INESC)	Brazil
Rede Brasil sobre Instituições Financeiras Multilaterais	Brazil
Rede Pantanal	Brazil
Arakan Oil Watch	Burma exile groups
Karen Environmental and Social Action Network (KESAN)	Burma exile groups
Housing Rights Task Force	Cambodia
League of the Boeung Kak Lake Women Struggle for the Housing Rights	Cambodia
Shelter for the Poor	Cambodia
Center for Environment and Development	Cameroon
Réseau de Lutte contre la Faim (RELUFA)	Cameroon
Campaigns Against the Cruelty to Animals (CATCA)	Canada
Humane Society of Canada	Canada
Maison de L'Enfant et de la Femme Pygmee (MEFP)	Central African Republic
Asociacion Interamericana para la Defensa del Ambiente (AIDA)	Chile
ECOFONDO	Colombia
Fundación Caminos de Identidad (FUCAI)	Colombia
Instituto Latinoamericano para una Sociedad y un Derecho Alternativos (ILSA)	Colombia
Proceso Agenda Común para la Gobernabilidad en Territorios Ancestrales	Colombia
Eastern Caribbean Coalition for Environmental Awareness (ECCEA)	Commonwealth of Dominica
Forum National sur Dette et la Pauvrete (FNDP)	Cote d'Ivoire
Centre National d'Appui au Developpement et a la Participation Populaire (CENADEP)	DR Congo
Conseil Régional des ONG de Développement (CRONGD) – Kasai Oriental	DR Congo
Dynamique des Groupes des Peuples Autochtones (DGPA)	DR Congo
Groupe d'Action pour Sauver l'Homme et son Environnement (GASHE)	DR Congo
Groupes d'Appui aux Exploitants des Ressources Naturelles (GAERN)	DR Congo
Le Groupement International des Volontaires Africains au Congo (GIVAC)	DR Congo
Maendeleo-Kindu Maniema	DR Congo
Organisation d'Accompagnement et d'Appui aux Pygmees (OSAPY)	DR Congo
Reseau des Communicateurs de l'Environnement (RCEN)	DR Congo
Reseau pour la Conservation et la Rehabilitation des Ecosystemes Forestiers (Reseau CREF)	DR Congo
Reseau Ressources Naturelles (RRN)	DR Congo
Coordinadora de las Organizaciones Indígenas de la Cuenca Amazónica (COICA)	Ecuador
ECOLEX	Ecuador

Sociedad Ecuatoriana de Derecho Forestal y Ambiental (SEDEFA)	Ecuador
The Pachamama Alliance	Ecuador
Appropriate Development, Architecture and Planning Technologies (ADAPT)	Egypt
Arab Digital Expression Foundation	Egypt
Association of Human Communication	Egypt
Coptic Evangelical Organization for Social Services (CEOSS)	Egypt
Egyptian Center for Social and Economic Rights	Egypt
Egyptian Democratic Academy	Egypt
Egyptian Health Association	Egypt
Egyptian Initiative for Personal Rights (EIPR)	Egypt
Egyptian NGOs Federation for Children's Rights	Egypt
Egyptian Organization for Collective Rights	Egypt
Energy Consumers Organization (ECO)	Egypt
Forum of Dialogue and Participation for Development (FDPD)	Egypt
General Association for Internal Migration (IMADA)	Egypt
Habi Center for Environmental Rights	Egypt
Kenouz Sinai Association for Economic Development and Environmental Protection	Egypt
National Front for Fighting Disability	Egypt
Spirit of Youth for Environmental Services, Manchiyet Nasser	Egypt
Brainforest	Gabon
Conservation Justice	Gabon
Worldview	Gambia
Urgewald	Germany
Third World Network-Africa	Ghana
Volta Basin Development Foundation	Ghana
Association des Jeunes Filles pour la Promotion de l'Espace Francophone	Guinea
Association Guinéenne pour la Transparence	Guinea
Animals Asia Foundation	Hong Kong
Water Initiatives, Odisha	India
Bharat Jan Vigyan Jatha	India
Citizens Concern for Dams and Development	India
Forum for Indigenous Perspectives & Action	India
Intercultural Resources	India
Kalpavriksh	India
Khan Kaneej Aur Adhikar	India
Machimar Adhikar Sangharsh Sangathan	India
Manthan Adhyayan Kendra	India
Nadi Ghati Morcha	India
North East Peoples Alliance	India
Odisha Chas Parivesh Surekhsa Parishad	India
Urban Research Centre	India

AMAN - The Indigenous Peoples Alliance of the Archipelago	Indonesia
debtWATCH	Indonesia
HuMA Foundation	Indonesia
Indonesian Center for Environmental Law	Indonesia
Institute for Essential Services Reform	Indonesia
SAWIT WATCH	Indonesia
Campagna per la Riforma della Banca Mondiale (CRBM)	Italy
Japan Center for a Sustainable Environment and Society (JACSES)	Japan
Active Youth	Kazakhstan
Jamaa Resource Initiatives	Kenya
Maasai Community Outdoor Educators	Kenya
Balkan Investigative Reporting Network	Kosovo
DokuFest	Kosovo
Forum for Civic Initiative	Kosovo
Institute for Advanced Studies	Kosovo
International Crisis Group - Kosovo	Kosovo
Internews Kosova	Kosovo
Kosovar Institute for Policy Research and Development	Kosovo
Kosovo 2.0	Kosovo
Prishtina Institute for Political Studies	Kosovo
Youth Initiative for Human Rights	Kosovo
Injaz Lebanon	Lebanon
Lebanese Physical Handicapped Union	Lebanon
Middle East Advocacy and Research Center	Lebanon
Shu'on Janoubia	Lebanon
The Lebanese Organization for Studies and Training	Lebanon
Sustainable Development Institute	Liberia
Institute for Research and the Promotion of Alternatives in Development (IRPAD)	Mali
Mer Bleu	Mauritania
Nouadhibou Youth Convergence	Mauritania
Centro Mexicano de Derecho Ambiental, A.C. (CEMDA)	Mexico
FUNDAR, Centro de Análisis e Investigación	Mexico
Proyecto de Derechos Económicos, Sociales y Culturales (PRO-DESC)	Mexico
Project on Organizing, Development, Education, and Research (PODER)	Mexico
Red-MOCAF	Mexico
SAKBE Comunicación y Defensa A.C.	Mexico
Association Forum des Contributions	Morocco
Both ENDS	Netherlands
Cross Cultural Bridges	Netherlands
Cordaid	Netherlands
Greenpeace International	Netherlands
Africa Network for Environment and Economic Justice	Nigeria

Norwegian Forum for Environment and Development	Norway
Rainforest Foundation Norway	Norway
Asociación Civil Labor	Peru
Asociación Nacional de Centros (ANC)	Peru
Asociación Pro Derechos Humanos (APRODEH)	Peru
Central Ashaninka del Rio Ene (CARE)	Peru
Centro Amazónico de Antropología y Aplicación Práctica (CAAAP)	Peru
Centro para la Sostenibilidad Ambiental Universidad Peruana Cayetano Heredia	Peru
Coordinadora Nacional de Derechos Humanos	Peru
Derechos, Ambiente y Recursos Naturales (DAR)	Peru
Grupo Propuesta Ciudadana	Peru
Programa Laboral de Desarrollo (PLADES)	Peru
Red Muqui	Peru
Alyansa Tigil Mina (ATM)	Philippines
Community Organizers Multiversity	Philippines
Philippine Indigenous Peoples Links (PIPLinks)	Philippines
Actions pour l'Environnement et la Solidarite Internationale (AESI)	Republic of Congo
Cercle d'Appui a la Gestion Durable des Forets (CAGDF)	Republic of Congo
Forum pour la Gouvernance et les Droits de l'Homme (FGDH)	Republic of Congo
Observatoire Congolais des Droits de l'Homme (OCDH)	Republic of Congo
Russian Association of Indigenous Peoples of the North	Russia
Lumière Synergie pour le Développement	Senegal
Pambazuka	Senegal
Union pour la Solidarité et l'Entraide	Senegal
EcoDoc Africa	South Africa
Institute for Democracy in Africa (Idasa)	South Africa
Center for Environmental Justice	Sri Lanka
Diakonia	Sweden
Bureau of Human Rights and Rule of Law	Tajikistan
Alternative Asean Network on Burma	Thailand
Community Organization for People's Action	Thailand
Human Settlement Foundation	Thailand
Leaders and Organizers of Community Organization in Asia (LOCOA)	Thailand
Groupe d'Action et de Recherche en Environnement et Développement	Togo
Jeunes Volontaires pour l'Environnement	Togo
Association for Development and Local Democracy	Tunisia
Higher Education Union, Bizerte	Tunisia
Research Labor Center	Tunisia
Tunisian Association for Numerical Freedom (ATLN)	Tunisia
The Initiative to Keep Hasankeyf Alive	Turkey
National Association of Professional Environmentalists	Uganda
Born Free Foundation	UK
Catholic Overseas Development Agency (CAFOD)	UK

Christian Aid	UK
Forest Peoples Programme	UK
Global Witness	UK
Jubilee Scotland	UK
Rainforest Foundation UK	UK
Bretton Woods Project	UK
National Ecological Centre of Ukraine	Ukraine
Accountability Counsel	USA
Amazon Watch	USA
American Jewish World Service	USA
Bank Information Center	USA
Born Free USA	USA
Center for International Environmental Law	USA
Cetacean Society International	USA
Conservation International	USA
Crude Accountability	USA
Cultural Survival	USA
Environmental Defense Fund	USA
Environmental Investigation Agency	USA
Friends of the Earth US	USA
Gender Action	USA
Government Accountability Project	USA
Humane Society International	USA
International Accountability Project	USA
International Rivers	USA
Natural Resources Defense Council	USA
NatureServe	USA
Oil Change International	USA
Pacific Environment	USA
Rainforest Action Network	USA
Rainforest Foundation US	USA
Sierra Club	USA
The Nature Conservancy	USA
Ulu Foundation	USA
Women's Environment & Development Organization (WEDO)	USA
World Wildlife Fund	USA
Center for Sustainable Development in Mountainous Areas	Vietnam
Department of Ecology/Institute for Tropical Biology	Vietnam
Rural Development Services Center	Vietnam
Democracy School	Yemen
Yemen Observatory for Human Rights	Yemen
Citizens for a Better Environment	Zambia