



BIC's Comments on the IDA21 Draft Replenishment Report November 2024

Over the last two years, the World Bank Group has undergone significant reforms aimed at becoming a “Better and Bigger Bank.” These priorities are reflected in the International Development Association’s (IDA) 21st replenishment (IDA21) Draft Replenishment Report, “Ending Poverty on a Living Planet: Delivering Impact with Urgency and Ambition.” Notably, IDA21 policy commitments are aligned with the Bank’s recently revised Corporate Scorecard for the first time. While the Bank’s initiative to increase consistency across its policies and operations is a step in the right direction, we are concerned that this change diminishes IDA’s additive value. For instance, several policy commitments from IDA’s last replenishment, IDA20, are not included in the IDA21 draft replenishment report. As the Bank aligns its operations around the Corporate Scorecard, IDA must not abandon priorities critical to fulfilling its mandate to “help countries invest in their futures, improve lives, and create safer, more prosperous communities.”

As the world faces compounding crises, including climate change, economic downturns, and the rise of authoritarianism and conflict, IDA plays an essential role in addressing our most critical development challenges and setting high standards across the field. The IDA21 policy package should show ambition and commitment to the highest environmental, social, accountability, and transparency standards, seeking to include marginalized groups in project benefits and enable project-affected communities to participate in the development process. An oversimplification of the IDA21 policy package by duplicating the Corporate Scorecard and increased emphasis on scale and speed without proportional accountability measures puts this impact at risk.

Specifically, we call on IDA to raise its ambition and address the following priorities in the IDA21 policy package:

- 1. Enable communities to seek accountability and remedy when harmed by IDA projects:** As part of the reform process, the Bank has placed a greater emphasis on decreasing project approval times and raising the speed of implementation. The [IDA21 policy framework](#) describes this strategy as “designed to deliver results with speed and at scale, offering greater flexibility to respond to client needs and navigate increasingly complex development challenges and opportunities.” IDA must be able to respond to urgent global challenges, including climate change and pandemics, but not at the expense of project-affected communities and the environment. Unfortunately, time and again, we have seen IDA investments cause social and environmental harm, leaving communities worse off and undermining IDA’s development mandate. Any expansion of IDA’s lending portfolio or decrease in approval times should be accompanied by more

stringent environmental and social due diligence, increased disclosure times of project documents, and a renewed commitment to respond to the findings of accountability mechanism processes and implement remedial action plans. Specifically, we call on IDA to include the following commitment in the final policy package:

- a. *New stakeholder engagement indicator:* Stakeholder engagement is critical to IDA's ability to meet both its development and climate goals and must be prioritized across all its focus areas. New and expanded climate investments are more likely to be effective if developed in partnership with communities. We welcome the inclusion of a new indicator measuring the quality of citizen and civic engagement as part of the Organizational Effectiveness and Efficiency Dashboard. We encourage the development — informed by meaningful consultations — of a robust methodology for this new indicator that takes into account the participation of marginalized groups and restrictions on civic space at the country level and in the project context.

2. Prioritize accountability, transparency, inclusivity, and ambition in climate

commitments: We welcome IDA's focus on climate under the Planet Focus Area in the IDA21 Draft Replenishment Report. However, IDA must commit to improving its accountability, transparency, inclusivity, and ambition in all climate finance in the IDA21 policy package, particularly around climate risks, physical infrastructure, and sustainable energy. We encourage IDA to include the following commitments for all lending instruments, including Development Policy Finance, in its finalized Replenishment Report:

- a. *Expand GHG outcomes commitment:* We welcome IDA's commitment under the Planet Focus Area to report annually on the net GHG emissions in its portfolio. However, to increase transparency and accountability of its climate finance, IDA should detail how it will monitor, report, and verify projects' climate-related impacts through indicators for GHG gross and net emissions/reductions. IDA should also provide full project-level transparency on baseline GHG analyses, areas of land and water with improved resilience, and carbon stocks, whether in soil, plants, or marine areas.
- b. *Increase ambition of adaptation commitments:* We welcome the climate adaptation policy commitments under the Planet Focus Area. IDA-recipient countries, and particularly the most marginalized groups in these countries, are at risk of enduring the worst impacts of climate change, and adaptation measures are critical to mitigate this harm. Therefore, we encourage IDA to show increased ambition and commitment to supporting all IDA countries on adaptation and resilience policies and/or climate preparedness interventions. IDA can achieve greater efficiency and effectiveness in this by prioritizing [ecosystem-based adaptation](#) since this can offer climate mitigation and biodiversity benefits as well, often at lower cost than built infrastructure.
- c. *Expand strategic approach on methane emissions:* Under the Planet Focus Area, we welcome IDA's strategic approach to accelerate methane emission reduction.

We encourage IDA to expand this commitment to include all GHG emissions, including carbon emissions. Internal combustion engine vehicles are the largest source of urban air pollution in IDA countries and the largest growing source of carbon emissions. IDA should support transportation infrastructure and services that reduce air pollution and carbon emissions, which means shifting investment towards low-carbon public transport systems.

- 3. Enhance natural capital in land use:** IDA21 is the first replenishment following the adoption of the [Kunming-Montreal Global Biodiversity Framework](#). We welcome several of IDA's strategic approaches under the Planet Focus Area, including:
- a. Advance the sustainable management and conservation of forest landscapes for development, climate, and biodiversity, with special attention to conservation and restoration of peatlands, wetlands, and mangroves;
 - b. Track investments that finance nature and support implementation of the Kunming-Montreal Global Biodiversity Framework and;
 - c. Protect biodiversity and ecosystem services through support for integrated landscape management programs tackling resource exploitation, rural poverty, community rights, and land management, including channeling finance to local communities.

However, the IDA21 policy package should show increased ambition and focus on areas of high carbon stock (HCS) and high conservation value (HCV) to help IDA countries better address the twin climate and biodiversity crises. IDA should commit to disaggregating results for HCS and HCV areas when reporting on areas with improved management. This data would add significance to the measurement of IDA countries supported in implementing their National Biodiversity Strategies and Action Plans (NBSAPs) and would also be helpful when assessing other areas impacting land use, such as farms and rangelands.

- 4. Apply the 'Recipe' for Food Systems Transformation.** We welcome the commitment to support 45 countries to design and implement agriculture sector reforms including agriculture production and technology transfer, and investment programs aimed at increasing food and nutrition security and sustainability of food systems. However, we suggest that the Bank follow the recommendation of its own [Recipe for a Livable Planet](#) and [Detox Development](#) reports by shifting more support to smallholders and to regenerative and agroecological farming, and away from industrial monocultures. This approach would better strengthen the resilience of food systems and support the repurposing of agricultural subsidies.
- 5. Seek stronger commitments on disability during IDA21:** While we are pleased that the new Corporate Scorecard disaggregates 23% of all indicators by disability inclusion, which is referenced in the IDA21 Draft Replenishment Report, we encourage IDA to show greater ambition in its final IDA21 policy commitments. The IDA21 policy commitments should consider disability inclusion more holistically, including in the

People, Planet, and Infrastructure focus areas. Adverse climate impacts are likely to fall heaviest on the poorest and most marginalized groups, particularly [persons with disabilities](#). Avoiding these impacts requires urgently implementing mitigation measures and adaptation strategies to avert a worst-case scenario. Yet, persons with disabilities continue to be one of the least likely groups to be considered and included in discussions about mitigation and adaptation. Since climate is a key priority during the IDA21 replenishment, the Bank must address this gap. Additionally, IDA21 should build upon outcome 8 in the Corporate Scorecard on sustainable transport and support investments in fully accessible transport systems.

- 6. Show greater ambition around preventing Gender-Based Violence (GBV), particularly in FCV contexts:** The IDA21 Replenishment Report only references preventing GBV in the context of its institutional commitment to mainstream the World Bank’s [Gender Strategy 2024-2030](#) and under the strategic approach for the Gender Equality Lens. Notably, there are no country-level commitments to prevent GBV, particularly in fragility, conflict, and violence (FCV) contexts, despite extensive discussion on GBV, including in FCV contexts, in the [June 2024 IDA21 ‘Lenses’ Paper](#). We are very concerned that IDA removed these references from the Draft Replenishment Paper. Achieving gender equality continues to [stagnate and regress](#) in nearly 40% of countries and, according to the Bank’s own [projections](#), by 2030, nearly 60% of the world’s extreme poor will live in countries affected by FCV. The Bank also [reports](#) that FCV increases the risk of GBV and prevents them from accessing social services. During the 20th replenishment, IDA acknowledged these trends and committed to supporting at least 10 IDA countries to strengthen national policy frameworks for prevention and response to GBV. During the last replenishment, IDA also committed to supporting GBV-related services in health systems and implementing GBV prevention and response protocols in at least 15 IDA countries, of which five are in fragile and conflict-affected situations. We call on IDA to build upon IDA20 and integrate country-level GBV commitments into its IDA21 Replenishment Report. While we welcome IDA’s commitment to mainstream the Gender Strategy, an institutional commitment to prevent GBV does not go far enough, as risk for GBV is highly context and culture-specific.
- 7. Protecting children from Sexual Exploitation, Abuse, and Harassment (SEA/H) should be a higher priority:** Preventing child SEA/H and protecting children provides significant development benefits and contributes to meeting the goals of outcome areas 2 and 3 in the Corporate Scorecard on supporting children with better education and healthier lives. We encourage IDA to include the following commitments in its final Replenishment Report:

 - a. *New policy commitment on preventing child SEA/H:* The IDA21 Replenishment Report doesn’t include any commitments around preventing child SEA/H. However, there is an inherent risk of child SEA/H in all IDA-funded projects. Like GBV, child SEA/H is particularly acute in FCV contexts, which is also an IDA21 Lens. As an industry leader, the Bank should use IDA21 as an opportunity to

contribute to systemic reform and address the root causes of child SEA/H. The IDA21 policy package should include a specific policy commitment that addresses the need to prevent child SEA/H. This commitment should consider the unique SEA/H risks children face, especially marginalized children, such as those who have a disability and/or are LGBTQI+. Within this commitment, there should be an IDA21 indicator that measures the countries supported in strengthening their child SEA/H prevention measures.

- b. *Expand Institutional Policy Commitment on Gender Equality:* We welcome IDA's commitment to address sexual and reproductive health (SRH) in 35 countries. Within this commitment, we encourage IDA to strengthen the GBV [service provision](#) for SEA/H victims, including children, which continues to be a gap in project implementation.
- c. *Expand Institutional Policy Commitment on Digital Transformation:* We welcome IDA's commitment to supporting 50 countries to increase access to inclusive, affordable, safe, and sustainable broadband connectivity and/or digital platforms. Within this commitment, we encourage IDA to acknowledge the [alarming global rise in online child SEA/H](#) and include a focus on preventing online child SEA/H and improving IDA-member countries' response.

8. Include child protection elements in social protection system strengthening commitments: IDA projects pose unique risks to children, and many of the poorest children live in [Sub-Saharan Africa and FCV countries](#), a large share of which are IDA client countries. IDA may exacerbate project harms or the exclusion of children from project benefits by not disaggregating data by age or considering child-specific risks and needs. IDA should integrate a commitment to support crisis-ready social service delivery under Policy Commitment 8 on continuity of services. We also encourage IDA to expand Policy Commitment 15, which focuses on children and adolescents, and commit to disaggregating beneficiaries' data by age and specifically [integrate child protection elements into social protection commitments](#). We call on IDA to use its role as a leader in development finance to help protect some of the world's most marginalized children.

9. Go beyond the gender binary and address SO/GI/SC (sexual orientation, gender identity, and sex characteristics): We are pleased that in line with the Corporate Scorecard, the IDA21 Draft Replenishment Report commits to disaggregating results indicators by sex, as relevant. However, in the IDA21 policy commitments, we encourage IDA to expand its definition of gender beyond the binary, in line with the World Bank's Gender Strategy, and include references to gender and sexual minorities. The IDA21 policy package should go beyond addressing the rights of women to also promote the inclusion of LGBTQI+ individuals throughout the lifecycle of IDA projects. We also encourage IDA to show increased ambition and broaden the scope of gender to also include men and boys and issues faced specifically by them.

We appreciate IDA's renewed commitment to outcomes and ambition towards achieving meaningful progress. However, while strong IDA21 policy commitments are critical, it is equally important that IDA build strong mechanisms for monitoring and implementation throughout the project cycle to prevent harm and promote equitable access to project benefits. We have seen repeated examples of projects that meet environmental and social standards at the approval stage but harm communities and the environment during implementation. Without sufficient monitoring and evaluation throughout the project cycle, IDA cannot address problems as they arise or adequately measure the success of a project. We are pleased that the World Bank has committed to reporting the disaggregated data from the IDA Scorecard and providing this information in an easily accessible and searchable format. However, we call on IDA to build upon this progress and also disaggregate and differentiate project impacts on marginalized groups, for example, children and persons with disabilities, and to conduct and report on regular contextual risk assessments. Finally, the IDA21 policy commitments must be clear that IDA retains ultimate responsibility for conducting due diligence and supervising compliance with the environmental and social standards, and providing avenues for remedy in case of harm resulting from noncompliance.

In the current political environment, IDA21 must demonstrate to its donor and recipient countries that it provides additional value that addresses the specific needs of the world's poorest countries and the most marginalized groups within those countries. IDA21 should build on IDA20 to include specific, actionable policy commitments, as detailed above, that prioritize supporting all countries to adapt to climate change, the inclusion of marginalized groups, and accountability and transparency for IDA-funded projects. Such commitments would maximize IDA's value to the citizens of borrowing countries and help fulfill countries' unique development goals.