



Civil Society Guide to the World Bank's Environmental and Social Framework

What is the Environmental and Social Framework (ESF)?

The Environmental and Social Framework, or ESF, is a set of requirements that are meant to ensure that development projects financed by the World Bank do not harm people or the environment, or discriminate against marginalized groups. Country governments borrowing from the World Bank to finance development projects must adhere to the standards laid out in the ESF as a condition of financing. The ESF sets standards for the way that development projects financed by the World Bank should be conducted in a number of areas, including ensuring safe labor and working conditions, preserving natural habitats, and engaging with project stakeholders.

What has changed?

Beginning in 2012 the World Bank undertook a 5-year review process to update and streamline the environmental and social safeguard policies that have been put in place over several decades, initially as a response to civil society and community demands in cases where Bank funded projects caused harm. This review process included global consultations with civil society.

The new Framework differs from the previous Safeguard policies in both **structure** and **content**.

In terms of **content**, the new Framework covers several issue areas that were not in the old Safeguard policies, and in particular expands coverage of social issues that had not been directly addressed or included in the previous Safeguard policies. A new standard was added in the ESF on Labor and Working Conditions, and a standard was added on Stakeholder Engagement and Information Disclosure. Language on gender was expanded across the new Framework, and consideration of disadvantaged and vulnerable groups was added in a new Directive for Bank staff. Civil society broadly welcomed the inclusion of social issues where there had previously been gaps in the coverage of the Safeguard policies, but have expressed concerns about whether the Bank is sufficiently investing in the rapid scale-up of capacity and expertise required on both the Bank and borrower sides to effectively cover these new issues.

The **structure** of the Framework differs in that there has been a significant shift in responsibility for implementing the 10 Environmental and Social Standards (ESSs) from the Bank to borrowing governments. The Bank's role shifts to one of

conducting due diligence before agreeing to finance a particular project, and supervision, monitoring, and evaluation during the project design and implementation. Civil society continues to voice serious concerns that shifting responsibilities for implementation of the ESF to borrowers will lead to a weakening of the social and environmental protections that prevent harm in Bank-financed projects. Civil society are also concerned about greater flexibility in language and requirements in the new Framework.

When does the ESF apply?

Eventually, all projects financed through the World Bank's main lending instrument, [Investment Project Financing](#), will be required to adhere to the ESF. However, for projects that were already in the process of being prepared when the ESF became effective on October 1, 2018, the World Bank's previous set of Environmental and Social Safeguard policies still apply.

What are the major components of the new framework?

- **Environmental and Social Policy (ESP)** - Overarching policy statement that lays out World Bank due diligence requirements.
- **World Bank Directive on Addressing Risks and Impacts on Disadvantaged and Vulnerable Individuals or Groups** - provides direction for World Bank staff on identification and mitigation of increased risks to groups and individuals who might be more likely to be adversely affected by project impacts or more limited than others in their ability to take advantage of project benefits due to their particular circumstances (such as age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or indigenous status, and/or dependence on unique natural resources, etc.).
- **Environmental and Social Standards (ESSs)** - 10 individual standards covering different topic areas that must be applied by the borrower in each project.
- **Guidance Notes** - Non-binding guidance for borrowing governments on the implementation of the ESSs.

- **Good Practice Notes** - Non-binding guidance for World Bank staff on issues that might come up in the implementation of the ESF. Good Practice Notes on Addressing Gender Based Violence Assessing and Managing the Risks and Impacts of the Use of Security Personnel, Non-Discrimination and Disability, and Third Party Monitoring have been developed, and new Notes may be added if the Bank sees a need.

Why is the ESF important for civil society?

When the World Bank becomes involved in financing or co-financing a development project, the borrowing government agrees to implement the project according to specific environmental and social standards. For projects financed under the World Bank's main lending instrument, the standards that must be applied are the Environmental and Social Framework.

Knowing the requirements that internationally-financed projects are contractually obligated to meet gives civil society and communities a handhold for accountability in the development process. If the requirements are not being met, civil society and communities can report violations to the World Bank or file a complaint. Specific requirements in the new ESF guarantee civil society, communities, and the general public access to project information and provide openings to give input to project teams about projects in which they have an interest.

The 10 Environmental and Social Standards

01 Assessment and Management of Environmental and Social Risks and Impacts

ESS1 requires that borrowers identify and manage environmental and social risks associated with a project, including through conducting an environmental and social assessment during the project preparation stage. Establishes a mitigation hierarchy which instructs borrowers first to anticipate and avoid risks and impacts; then to minimize or reduce risks and impacts to acceptable levels; then once risks and impacts have been minimized or reduced, mitigate; and finally, where significant residual impacts remain, compensate for or offset them. Instructs borrowers to ensure that project negative impacts do not fall disproportionately on those who might be disadvantaged or vulnerable, and to ensure that all groups have access to project benefits.

02 Labor and Working Conditions

ESS2 requires that borrowers ensure safe labor and working conditions in Bank-financed projects. Prohibits the use of forced or child labor in Bank-financed projects. Borrowers must provide a grievance mechanism for project workers, including sub-contracted workers.

03 Resource Efficiency and Pollution Prevention and Management

ESS3 requires borrowers to promote the sustainable use of resources, including energy, water, and raw materials, while avoiding or minimizing adverse impacts on human health and the environment caused by pollution from project activities, project-related emissions of short and long-lived climate


pollutants, generation of hazardous and non-hazardous waste, and risks and impacts associated with pesticide use. Requires borrowers to estimate gross GHG emissions, where feasible, and to apply World Bank Group's Environmental Health and Safety Guidelines and other Good International Industry Practice.

04 Community Health and Safety

ESS4 requires borrowers to anticipate or avoid adverse impacts on the health and safety of project-affected communities, promote quality, safety, and climate change considerations in infrastructure design and construction, including dams, avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials, and have in place effective measures to address emergency events, and ensure that safeguarding of personnel and property avoids or minimizes risks to the project-affected communities. Requires Borrowers to address water-related, communicable and non-communicable diseases that can result from project activities.

05 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

ESS5 defines the types of involuntary displacement (including economic displacement) that can result from development projects. Defines who borrowers must consider as impacted people by involuntary resettlement (including those who do not have formal claim to the land that they use or live on). Lays out a process for developing a Resettlement Action Plan for mitigating adverse impacts in projects where there are potential involuntary resettlement impacts.



Biodiversity Conservation and Sustainable Management of Living Natural Resources

ESS6 requires Borrowers to protect and conserve biodiversity and habitats, apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity, and support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities. It includes requirements for legally protected, designated or regionally/internationally recognized areas of high biodiversity value. It also includes provisions to prevent invasive alien species and requirements on animal husbandry and large-scale commercial farming. Primary suppliers of natural resource commodities are also required to meet sustainability requirements.



Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities


ESS7 requires that borrowers conduct a Vulnerable Groups Framework for projects that could have an impact on indigenous peoples (and Sub-Saharan African Historically Underserved Traditional Local Communities). Projects that impact these groups can only proceed if free, prior, and informed consent (FPIC) is sought and received from these communities prior to the project commencing, and must be maintained through continuing provision of current project information and dialogue throughout the term of the project.



Cultural Heritage

ESS8 requires Borrowers to protect cultural heritage from the adverse impacts of project activities and support its preservation, address cultural heritage

as an integral aspect of sustainable development, promote meaningful consultation with stakeholders regarding cultural heritage, and promote the equitable sharing of benefits from the use of cultural heritage.



Financial Intermediaries

ESS9 governs Financial Intermediaries (FIs), which are banks or other institutions that have their own lending/financing portfolio to finance development projects. ESS9 requires that when the World Bank provides funds to an FI, the FI must have in place environmental and social systems, and create an Environmental and Social Management System (ESMS). Requires that FIs engage with stakeholders, and disclose a summary of its ESMS.



Stakeholder Engagement and Information Disclosure

ESS10 requires that borrowers identify all stakeholders of a project, including those who stand to benefit or are at risk of facing negative impacts as a result of the project, with particular attention to vulnerable and disadvantaged groups. Requires borrowers to publicly disclose information about project risks and benefits in a language and manner understandable and accessible to project stakeholders. Instructs borrowers to develop a plan (laid out and made public in the Stakeholder Engagement Plan) to ensure that all stakeholders are informed and consulted on project risks and impacts throughout the project life cycle, and to establish an independent, accessible grievance mechanism and process for stakeholders to submit project-related complaints.

Why is ESS10 particularly useful for civil society and communities?

While all of the environmental and social standards are important for safeguarding people and the environment in World Bank financed projects, ESS10 can be an opportunity for concerned groups to raise a range of issues and is therefore a key policy to be aware of and understand. Stakeholder engagement policies can present entry points that enable communities and civil society organizations to engage in the development process. ESS10 is meant to ensure the engagement of all stakeholders in each phase of the project from inception through implementation and monitoring, and ending with the closure and decommissioning of the project. Throughout the project cycle, the borrower must report periodically on the implementation of all the policies governing the project, including the implementation of ESS10. ESS10's requirements provide entry points for stakeholders to be engaged. These entry points can be summed up in three main categories: access to information, venues to provide input and receive feedback, and finally grievance redress. ESS10 requires that the borrower provide details on how each of these three categories will be satisfied in ways that fit the nature and scale of the project and also the characteristics of the stakeholders.

Who are stakeholders?

The World Bank divides project stakeholders into two main groups. Depending on the nature and scale of the project, these groups can be local, regional, or national. The two groups are:

1. Those who are directly affected, either positively or negatively, by the project, and/or their representatives. The borrower has the responsibility to verify that representatives truly represent and communicate with the affected communities they represent.
2. Those who are interested in the project. These groups can be government agencies, private sector entities, academia or non-governmental organizations (NGOs) who are concerned about the specific sector or issue the project focuses on or potential impacts of the project.

How and when are stakeholders identified?

Very early on in the project cycle, before the World Bank approves the project, the borrower must list and analyze each of the stakeholder groups, identify how each is affected, concerned about, or interested in the project, and the main characteristics of each group. Special attention should be given to the vulnerable and disadvantaged groups such as the elderly, women, children, minorities, indigenous populations, people with disabilities, LGBTQ, etc. In developing the list of stakeholders, and the analysis that accompanies it, the borrower can consult and discuss with different entities who are knowledgeable of the local and sector context, and also with representatives of the identified stakeholders. In high risk projects, the borrower can seek the help of an independent specialist to develop the entire analysis or parts of it.

Can anyone be engaged?

Anyone interested or who believes s/he might be impacted by the project can participate at any time, even if they have not been identified as stakeholders in the initial identification.

Where can I find details on each of the entry points for engagement in a specific project?

The borrower should develop a detailed plan to engage each of the identified stakeholder groups. This plan is called the Stakeholder Engagement Plan (SEP). Besides the identification and analysis of the stakeholders, the SEP should provide details on what, how and when the borrower will communicate with each of these groups. The borrower is obliged to discuss the draft SEP with the stakeholders and get their input on the proposed engagement plans. The plan should be submitted to the World Bank before the Bank approves the loan, and disclosed on the World Bank's website.¹ As project circumstances and

¹ Depending on the nature and the scale of the risks and impacts of the projects, the elements of a SEP may be included as part of the Environmental and Social Commitment Plan (ESCP), which lays out all the activities and actions the borrower will implement to comply with all the 10 ESF standards

stakeholders' concerns change during the project cycle, the SEP is updated to reflect such changes.

The SEP should be made available to all stakeholders in a format and language that is understandable to, and through channels that are appropriate for, all stakeholder groups. The borrower should inform the stakeholders about the publication of the SEP and venues to access it including through Bank and government agency websites, social and formal media, radio, posters, etc.

What does the Stakeholder Engagement Plan (SEP) cover?

Meaningful engagement means that the parties involved have enough information to contribute informed views and receive feedback on the views they provide, and also have access to functional accountability mechanisms to report concerns or problems.

The SEP includes details on the type of information that should be shared with each of the identified groups, as well as the timing, format, language, and dissemination venue for that information. It also includes the different venues designed for each of those groups to provide input and receive feedback, such as through in person consultation meetings or online surveys.

The plan for engagement with each of the identified groups is unique to fit the specific characteristics, interests and concerns for each group. Special efforts should be made to engage with vulnerable and disadvantaged groups. For example, information shared with affected communities should be in their local language and in less technical terms; innovative ways should be designed to communicate with communities with low literacy level; sign language and braille should be used as needed; and locations for in person engagement/consultation should be accessible to accommodate persons with disabilities. Engagement should also be free of coercion and intimidation and that is why special arrangements should be made to engage with groups who might be at risk or intimidated for cultural or political reasons such as women, children, elders, LGBTQ,

with a clear time frame. This ESCP should be submitted to the Bank, and disclosed, before the Bank approves the loan, and is included in the official legal loan agreement between the Bank and the borrower.

indigenous, or other minorities. The detailed plans for engagement with each of these groups should be included in the SEP.

What project information should be available?

Before the Bank approves a project, the borrower should share information about the project, the potential risks, the measures to be taken to avoid or minimize the risks, including mitigation and compensation plans for risks that cannot be avoided. The borrower should also consult with the communities on these measures and plans. In addition, the borrower should share and discuss the draft SEP with affected communities. The input received from stakeholders and the feedback from the borrower should be reflected in the documents submitted to the Bank before the Bank approves the project. These documents should be made available to the communities to verify that they truly reflect the issues raised in the engagement process.

Depending on the nature and scale of the risks associated with the project, more formal points of engagement/consultations should be organized with affected communities throughout the project life cycle to provide updates and receive feedback on risk mitigation plans. High risk projects require more frequent and intensive consultation. Low and medium risk projects require at least two formal rounds of consultation, one during project preparation and another during project implementation. Consultations should also be arranged whenever new risks are identified.

In addition to details on how, when, and where consultations will take place, the SEP also details what information needs to be disseminated before each of these consultations, as well as the means of dissemination and means to announce the availability of the information. The SEP also includes details on how consultations will be documented.

Engagement should not be limited to formal consultations; it is a continuous process. Throughout the project's life cycle, the borrower should continue to share updates on the project and on the implementation of the risk mitigation and compensation plans. The borrower should set appropriate systems to make these updates available on a continuous basis and to receive and respond to requests for more information. The SEP will also include information about other channels

of communication and engagement that allow the stakeholders to stay engaged, provide their inputs, and receive feedback.

How can stakeholders raise concerns about a project?

The borrower should set in place a mechanism to receive and address complaints for each project. The SEP should identify the entity in charge of receiving complaints and detail a clear system and timeline to look into the complaints. The different ways to file a complaint should be clearly described in the SEP, along with how project stakeholders will be informed about the grievance mechanism. The SEP should also clarify the measures that should be taken to protect complainants from retaliation. Special measures should also be identified to facilitate access to the grievance mechanism by vulnerable and disadvantaged groups.

What if the grievance mechanism does not resolve a complaint?

The project grievance mechanism is not a substitute for the Bank's other accountability mechanisms. Community members who believe they are harmed by a project can still approach the World Bank's management or the Bank's independent Inspection Panel to look into their concerns.

FOR FURTHER INFORMATION ON THE ISSUES RAISED IN THIS REPORT, PLEASE CONTACT BANK INFORMATION CENTER AT:

1023 15th St. NW, 10th Floor
Washington, DC 20005

Tel.: (202) 737-7752

Email: info@bankinformationcenter.org