



IDA13

**Comments Received from NGOs
on Draft IDA13 Report**

**International Development Association
January 2002**

Subject	Comments (transcribed directly from original)	Source/Date
User Fees	We ask that the replenishment agreement specify that countries imposing user fees for basic social services be given the lowest score for "Equity of Public Sector Use" and "Building Human Resources" in the IDA Country Policy and Institutional Assessment.	Blaise Salmon RESULTS, Canada 11/28/01
Institutional Accountability and Safeguards	<p><u>Strengthen Institutional Accountability for Policy Compliance.</u></p> <p>IDA Deputies have taken a commendable and welcome step forward in strengthening IDA’s institutional accountability by stressing “that IDA Management should ensure that IDA-financed projects are in full compliance with safeguard, fiduciary and other policies before presentation to IDA’s Executive Directors” (para. 10). By moving certification of policy compliance “upstream,” IDA management should be able to reduce the number of policy-level conflicts over its lending operations.</p> <p>Further, the Deputies stressed that “Management should assign internal responsibility for monitoring and implementation of these undertakings and reinforce accountability for policy compliance. Deputies asked management to report on implementation of this directive at the IDA13 mid-term review” (para. 87).</p> <p>However, the Action Plan at Annex 2 does not explicitly repeat the Deputies mandate of certifying policy compliance prior to Board action, nor does it contain a product or target date for implementing these critical accountability measures (see box “Strengthening Accountabilities”, p. 56). Without specific reporting requirements, it will be difficult to assess progress on this critical step forward.</p> <p>Recommendation: We recommend that the IDA Deputies include specific language on certification of policy compliance prior to Board presentation in the “Recommendations/Actions” section of the Action Plan. We also recommend that the IDA Deputies mandate that a section quantifying policy compliance measures be included as part of ESSD’s Annual Report on the Environment.</p>	Bruce Jenkins Bank Information Center, United States 11/29/01

<p>Information Disclosure and Transparency (continued)</p>	<p>The AFL-CIO and the ICFTU (which has affiliates in close to seventy PRSP countries) have worked to build the capacity of trade unions in poor countries to participate in the PRSP process. Yet it is very difficult for trade unions to trust the PRSP process when other IDA strategies and loans, especially structural adjustment loans, are simultaneously being prepared for their country in relative secrecy. The lack of access to adjustment lending documents before (and sometimes even after) Board approval, along with the failure to consult on the content of these loans, seriously compromises the quality of the PRSP process itself and the long-term relationship between the Bank and civil society in developing countries. IDA deputies should require IDA to work towards release of all loan and strategy documents in draft form, and towards the routine solicitation of public comment and consultation on these documents. IDA13 may start with pilot learning programs, but it should also set a timeline for implementation of a much more comprehensive disclosure and consultations policy.</p>	<p>Peter Bakvis International Confederation of Free Trade Unions (ICTFU), Washington Office 12/17/01</p>
<p>Monitoring and Evaluation</p>	<p><u>Civil Society Participation in Monitoring and Evaluation.</u></p> <p>The “Deputies encouraged IDA to broaden participation of borrowers and development partners in monitoring and evaluation of IDA’s assistance programs. Deputies recommended that Management determine the best way, depending on country circumstances, to ensure on-going feedback and engage partners in monitoring and evaluating the performance and development outcomes of IDA country programs” (para. 93).</p> <p>This critical accountability step in improving quality and ownership of monitoring and evaluation functions, however, is not included in the Action Plan.</p> <p>Recommendation We recommend that the IDA Deputies clarify that civil society groups will be considered “development partners” and have integral roles to play in the context of monitoring and evaluation (M&E). Further, we request that the IDA Deputies specifically include this important step in their Action Plan.</p>	<p>Bruce Jenkins Bank Information Center, United States 11/29/01</p>

<p>Monitoring and Evaluation (continued)</p>	<p><u>Monitoring Outcomes in Program-Based Lending</u></p> <p>By its own admission, the Bank's success in the area of SWAPs or program lending has been minimal, even catastrophic at times (see the health programs in Uganda and Zambia).</p> <p>As program-based lending is taking a larger and larger share of IDA, it is imperative that all IDA loans for social sector programs include real-time outcome monitoring and reporting. Executive Directors and the public must know whether enrollments have increased or decreased, whether immunization rates have increased or decreased etc..., before the end of the program, so adjustments can be made.</p> <p>Such real-time monitoring of outcomes (not necessarily an easy task, but not overwhelming either) is usually not factored in World Bank loans. It must be made compulsory for the poorest countries, which IDA serves.</p>	<p>Jean-Francois Tardif Results Canada, Canada 12/04/01</p>
<p>Globalization and Trade</p>	<p>Concerning the IDA 13 Report we think that an improvement could be in 2 main directions:</p> <p>1. It have to be more focused on 2 issues: a) Decreasing of the gap between rich and poor; b) Increasing of the participation of the poorest countries in the globalization process.</p> <p>2. More pragmatcal measures are needed for developing the synergy between the main international economic organizations (WB, IMF, WTO, UNIDO, OECD, etc) in implementation of a set of priorities for poor countries:</p> <ul style="list-style-type: none"> - Increase of their export (including development of their skills and infrastructure to support export, increase the level of export market diversification, etc.); - Elimination tariff and nontariff barriers; - Technology change; - Fostering greater integration with global economy etc. 	<p>Vladimir Pavlov Foundation for Entrepreneurship Development, Bulgaria 11/30/01</p>

<p>Poverty Reduction Strategy Paper (PRSP)</p>	<p>Catholic Relief Services commends the IDA Deputies for releasing the draft report for the IDA-13 replenishment and appreciates the opportunity to comment on the report with the US Department of Treasury and with the World Bank. Due to time constraints, we will limit our comments below to issues related to the Poverty Reduction Strategy.</p> <p><u>Civil society participation.</u> Although the document acknowledges the importance of participatory process (para. 29), it fails to recognize broad public participation in establishing the goals and directions for national development as a key aim of the PRSP (para. 24) or as critical element for achieving country ownership (para. 26), not simply as a device for securing greater government accountability. We therefore urge that these sections of the report and the “country ownership” section of the action matrix (p. 51) be amended to recognize the central role of civil society participation.</p> <p>Furthermore, we urge the IDA Deputies to call upon the World Bank to take steps to increase accountability to civil society input to PRSPs, for example, by including civil society comment on the PRSP process and content as an annex to all PRSPs, and by encouraging borrowing governments to adopt mechanisms for presenting feedback on civil society recommendations.</p> <p><u>Relation between PRSPs and IDA lending.</u> We appreciate the recognition that the PRSP should serve as the basis for IDA’s assistance to borrowing countries (para. 25). However, we believe this section should be strengthened by insisting that all loans and grants extended by IDA should be directly derived from the PRSP, and should include an explicit rationale for how they will fulfill the goals and be measured by the indicators set out in the PRSP. We also urge that the Deputies stipulate clearly that no conditions should be attached to IDA loans or grants that are not essential for achieving the goal of poverty reduction. We urge that language to this effect be added to both the text and to the action matrix.</p> <p>Furthermore, ensuring greater consistency between loans or grants and the PRSP cannot be achieved unless loans are subject to the same standards of transparency and disclosure as the PRSP. Therefore, we support the recommendations made in the past that all IDA loan negotiations and documents be subjected to democratic and transparent processes.</p> <p><u>Social and environmental impact assessments.</u> We believe that adopting ex-ante social and environmental impact assessments of policy-based lending as a standard procedure is</p>	<p>Kathleen Selvaggio Catholic Relief Services, United States 11/30/01</p>
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<p>PRSP (continued)</p>	<p>an another essential means of achieving consistency between lending instruments and the PRSPs. Therefore, we urge the Deputies to adopt and strengthen the language in brackets in para. 50, and to reflect this language in the action matrix. As we have urged in the past, these impact assessments should propose policy options that would minimize negative social and environmental impacts, with explanations of the trade-offs, and should include methodologies for incorporating analysis by affected people.</p> <p><u>Donor collaboration in support of PRSP.</u> We appreciate the recognition in the report that PRSPs should serve as a mechanism for increasing donor coordination and collaboration (para. 30). However, we believe that it will be difficult to achieve this level of collaboration as long as World Bank and IMF staff carry out the assessment of the PRSP and the boards reserve the power to “endorse” the PRSP. Therefore, we urge the Deputies to call upon the World Bank management to explore means of broadening the set of donors, including United Nations agencies and bilateral agency, in the assessments of PRSPs and in decisions whether or not to support PRSPs through finance.</p>	
<p>Environmentally Sustainable Development</p>	<p>Environmental Defense, Friends of the Earth, the Bank Information Center, Oxfam America, Natural Resources Defense Council, and the Center for International Environmental Law welcome the opportunity to comment on the draft IDA Deputies’ Report for the 13th Replenishment, Supporting Poverty Reduction Strategies. We commend the IDA Deputies for the language they have developed regarding the environmental implications of IDA programs and projects. However, we feel that certain positions within the report must be strengthened to ensure that environmentally sustainable development is promoted throughout IDA operations.</p> <p><u>Environmental and Social Assessments for Programmatic Lending.</u></p> <p>Programmatic lending accounts for an increasing percentage of IDA resources and often has far-reaching impacts on the natural environment and marginalized groups within borrowing countries. Civil society has repeatedly called for a formal examination of the environmental and social implications of non-project lending, in light of well-documented evidence of the need for such processes. The language regarding ex ante environmental and social diagnostics for non-emergency adjustment lending represents a significant step forward and we urge donors to support this position (para. 50).</p>	<p>Shannon Lawrence Environmental Defense, United States 11/30/01</p>

<p>Environmentally Sustainable Development (continued)</p>	<p>Nevertheless, to ensure that environmental considerations are truly mainstreamed throughout IDA operations, we feel that the IDA Deputies must strengthen their position on environmental assessments for programmatic lending. We recommend the following:</p> <ul style="list-style-type: none"> -- Clarification of the term “diagnostics.” Specifically, will environmental and social diagnostics include baseline studies that examine the direct and indirect relationships between programmatic lending, the environment, and marginalized groups? What distinguishes “diagnostics” from “fuller assessments”? Will fuller assessments be conducted through an open and participatory process and present mitigating policy options? -- Strengthening of language. We urge IDA Deputies to request that the Bank includes these diagnostics and assessments as part of the revised adjustment lending policy and to require that in cases where adjustment lending or other programmatic lending has significant social or environmental impacts that fuller assessments be conducted. -- Incorporation into Objectives and Action Matrix. The recommendations for environmental and social diagnostics and assessments for programmatic lending should be included in the recommendations/actions matrix with a product and a target date. <p><u>Extractive Industries, Natural Resources, and the World Commission on Dams (WCD)</u></p> <p>Bank lending for extractive industries and large hydropower projects tends to be some of the institution’s most environmentally and socially risky investment. We enthusiastically support the IDA Deputies’ references to the environmental and social complexities of projects in the extractive industries and other natural resource sectors, including dams (para.52). However, to ensure that projects in these sectors comply with safeguards and deliver sustainable development benefits to local people, IDA Deputies should assert the following:</p> <ul style="list-style-type: none"> -- Strengthening of language. Selection criteria should assess poverty reduction benefits rather than simply financial benefits. Additionally, IDA project compliance with all environmental and social safeguard policies should be emphasized. We urge IDA Deputies to recommend a moratorium on the financing of extractive industries projects in certain zones, such as ecologically sensitive areas, indigenous peoples’ lands, and areas of armed conflict. Groups such as Friends of the Earth, the World Wildlife Fund, and 	
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	<p>Conservation International have identified certain socially and environmentally critical areas that might be used as a reference.</p> <p>-- Incorporation into Objectives and Action Matrix. The recommendations concerning extractive industries, natural resources sector, and dams should be included in the recommendations/actions matrix with a product and a target date. Specifically, concrete actions regarding identification of selection criteria and the strategic priorities of the WCD must be outlined.</p> <p><u>Economic and Sector Work (ESW): Social and Environmental Areas</u></p> <p>As the Deputies point out, Economic and Sector Work (ESW) should be an area of strategic comparative advantage for IDA. The report stresses the importance of two sets of core diagnostics, including social and environmental analysis, and argues for increased budget support for diagnostic ESW (paras. 64-66). However, based on the</p> <p>current state of ESW in IDA, OED's Review of IDA 10-12 notes that environmental analyses for most IDA countries are more than five years old so we recommend the following addition:</p> <p>-- Explicit emphasis on up-to-date ESW. We ask that IDA Deputies emphasize the importance of up-to-date ESW in core social and environmental areas. The availability of current ESW is essential for the design of responsible emergency lending programs where fuller social and environmental assessments might not be possible given inherent time constraints.</p>	
<p>SOE</p>	<p>All SOE from project start to date</p>	<p>District Upland Development and Conservation Project, Laos 12/01/01</p>

<p>Labor Issues</p>	<p>Dear IDA Deputies,</p> <p>We are writing to submit our comments on the draft IDA13 deputies' report released late last week. We would like to commend the IDA deputies for releasing the report in draft form and allowing a brief period for public comment before your next, and final, deputies' meeting. This public release shows a serious commitment to the principles of transparency and participation and is deeply appreciated.</p> <p>While the draft report makes some progress on environmental issues, gender, user fees on health and education, the PRSP process, and the review and monitoring of IDA projects, we believe further improvements in IDA policies can and should be made in a number of key areas. IDA plays a central role in the economic and social development of the world's poorest countries, and the IDA replenishment provides an important opportunity to dramatically improve the quality of this assistance. We are particularly concerned with IDA's policies on workers' rights, private sector development, debt cancellation, and transparency and participation. We hope these comments will be taken into consideration for discussion at the final IDA deputies' meeting.</p> <p>We sincerely appreciate this opportunity to provide our views on future directions for World Bank lending to the poorest countries. We hope these comments will aid you in concluding the final IDA13 replenishment agreement. We look forward to working with the Bank to ensure it promotes respect for workers' rights, encourages sound private sector policies, provides deeper and broader debt relief, and ensures greater transparency and public participation in its programs.</p> <p><u>Workers' Rights.</u></p> <p>There is no separate section devoted exclusively to labor issues in the draft IDA13 report (there was a full paragraph just on labor issues in the IDA12 agreement). The draft report recognizes the need to implement core labor standards as part of a larger effort to improve the functioning of labor markets in IDA borrowing countries in paragraph 32. The deputies specifically emphasize eliminating harmful child labor, making labor markets more equitable and inclusive, and strengthening cooperation between the ILO and IDA in paragraph 40. Finally, in paragraph 65, deputies urge that results of social, structural and sectoral analyses be reflected in the CAS, and that these analyses be informed in part by an analysis of the labor market and labor standards.</p>	<p>Thea Lee American Federation of Labor and Congress of Industrial Organizations (AFL-CIO), United States 12/04/01</p> <p>Peter Bakvis International Confederation of Free Trade Unions (ICTFU), Washington Office 12/17/01</p>
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<p>Labor Issues (continued)</p>	<p>Unfortunately, unlike the IDA12 replenishment report, this report does not recommend new, concrete steps IDA should take to fully operationalize support for the core labor standards. This report mentions increased ILO cooperation in the same general terms as it was discussed in IDA12, with no assessment of IDA's progress on this mandate to date and no outline of the new steps that need to be taken. The deputies should recommend improved cooperation in field operations and country strategy preparation, and they should specifically mention ILO cooperation in filling governments' analytical gaps in the PRSP process (para. 63). The child labor language also repeats an IDA12 mandate without offering any new guidance.</p> <p>Similarly, the recommendation that an analysis of core labor standards inform the CAS basically restates the IDA12 mandate, with no critical assessment of progress to date. Deputies should recommend that the CAS labor analysis be reformed and expanded to proactively assess the potential impacts of any new policy recommendations on workers' abilities to exercise their core rights, as well as on the level and quality of employment, social dialogue, and economic security. In addition, labor needs to be specifically mentioned in the deputies' discussion in paragraph 26 on the need to analyze the social impacts of policy reforms in the PRSP.</p> <p>While these steps would be a significant improvement, ultimately all lending and strategy documents need to be subject to an ex ante assessment of the impact recommended policies may have on workers and on labor rights, leading to the mitigation of negative impacts and the formulation of alternative policy measures. This assessment should be backed up by enforceable safeguard policies for workers' rights that allow affected workers to complain to the Bank when a project violates their rights. Rather than simply repeating the steps already taken on workers' rights in IDA12 three years ago, we believe IDA13 can help push the Bank to more actively and routinely support core workers' rights in borrowing countries.</p>	
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<p>Private Sector Development</p>	<p>We are pleased that the draft report's section on private sector development includes a recognition of the importance of a transparent regulatory framework that enhances access by the poor to basic services, helps workers benefit from productivity growth, and improves environmental quality (para. 45). The deputies' request that IDA maintain a public record on efforts to eliminate user fees for basic education, and the deputies' strong support for the Bank's stated opposition to user fees on health care and education (para. 35), are also very welcome. We are concerned, however, that the private sector development strategy now being developed by the Bank does not adequately address these fundamental issues, and that more specific guidance on the social and labor aspects of private sector development is therefore required in the IDA13 report.</p> <p>Specifically, deputies should ensure that any private sector development strategy, especially one that contemplates the privatization of basic services and infrastructure, contains strong safeguards for workers' rights, social dialogue, employment levels and quality, and universal access to basic services. The IDA12 replenishment agreement specifically directed IDA to give more attention to the social and employment effects of privatization. In IDA13, deputies need to assess IDA's progress in fulfilling this previous mandate and recommend further steps for ensuring that privatization is fully supportive of a pro-poor, pro-worker, sustainable development strategy.</p>	<p>Thea Lee American Federation of Labor and Congress of Industrial Organizations (AFL-CIO), United States 12/04/01</p> <p>Peter Bakvis International Confederation of Free Trade Unions (ICTFU), Washington Office 12/17/01</p>
<p>Debt Cancellation</p>	<p>In the draft report, deputies appropriately note the risk that current levels of HIPC debt relief, combined with new lending to HIPC countries, may not lead to long-term debt sustainability for beneficiary countries (para. 83). Unfortunately, no strong new measures are recommended to alleviate poor country debt. The AFL-CIO supported the HIPC debt relief initiative, but we believe that much more can be done to dramatically reduce the debt burdens of impoverished countries. Along with allies in the religious, development, and environmental movements, we have called on the World Bank to cancel 100% of the debts owed to it by impoverished countries, using its own resources. The G-7 has already committed to cancel 100% of the bilateral debts of these countries, and we believe the same generosity is needed for multilateral debt.</p>	<p>Thea Lee American Federation of Labor and Congress of Industrial Organizations (AFL-CIO), United States 12/04/01</p>

<p>Debt Cancellation (Continued)</p>	<p>While increased IDA grants may help slow poor countries' accumulation of multilateral debts in the future, they will not help countries out from under their existing debt burdens. The extreme human need in the developing world, along with the scarcity of public resources and large amounts of multilateral debt, demand broader and deeper multilateral debt relief. The international financial institutions have the resources to cancel this debt; we hope the IDA deputies will have the political will to help make it happen.</p>	<p>Peter Bakvis International Confederation of Free Trade Unions (ICTFU), Washington Office 12/17/01</p>
<p>Projects in Africa</p>	<p>We need the procurement notices for projects in Africa. How do we get them?</p>	<p>Maha Mansour, tcb, Egypt, 12/12/01</p>
<p>Project in Pakistan</p>	<p>Hi Dear, I hope that you are well in these current difficult circumstances. I am Nazim Wafa, Chirstian, Student and from Pakistan.</p> <p>Dear I found your org from world bank's site, Which helps needy and poor people around the world. Yeah its true that God really blessed you and He is Blessing you.</p> <p>I want to tell you that my father and some other villagers have founded a society "Village Watch Society". this society is specially designed to serve the poor villagers as you know about our country. We have made our office and a women clothing center where women train to prepare clothes (free of cost training). We provided them 6 machines for this purpose and one teacher. Now we want to make a Health Clinic in village where there is no any kind of first aid whatever. In this village women are in serious condition because of giving birth to children. there is no hospital and like this. we need you support to this bless work for poor people. the voice of these people is not being heard by anyone. But they trust in God that He will provide for them. Dear if God let your heart towards these people contact me and ask any kind of question you want to ask. I will tell you every thing what I know. Dear I believe that Charity never goes fail, I trust that.</p> <p>Our society has a bank account, to with draw money from this account at least three society's recognized persons sing at the same time.</p> <p>i.g., "Allied Bank of Pakistan Ltd., 59-thd Mall,Lahore, (Village Watch Society, 3748-4)"</p> <p>now take care and God bless you and your mission.Amen Yours Truely Nazim Wafa</p>	<p>Nazim Wafa Village Watch Society, Fateh Pur Hathar, P/O Dost Pura Via khudian Khas, Tehsil & Dist Kasur, Pakistan.</p> <p>12/22/01</p>