



ऑक्सफैम इंडिया

OXFAM

India



VASUDHA
FOUNDATION

Green ways for a good earth!

A Compendium of
Policies and
Practices of Some
of the Multilateral
and Southern
Banks

**Policy
Wayforward
for the
New
Development
Bank**

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Introduction

The year 2015 saw a few historical decisions taken at the Global level, which could put countries on not only a Sustainable Development Pathway but also help in addressing Climate Change on a “War Footing”.

The first of these is the adoption of the 2030 Agenda for Sustainable Development including the Sustainable Development Goals, in September 2015 by 173 countries and was followed very soon by the adoption of the Paris Agreement by Parties to the United Nations Framework Convention to Climate Change in December 2015. Significantly, the Paris Agreement also came into force in November 2016, with 140 countries ratifying it, representing close to 83 percent of the Global Greenhouse Gas Emissions.

In view of these international agreements, there would be a lot of pressure on countries and country grouping and alliances to put in place policies and programmes which would ensure effective implementation of the Paris Agreement and simultaneously put countries on a path to achieve their 2030 Sustainable Development Agenda.

In the backdrop of this, countries have already started to put in place policies, frameworks and programmes that could put them on track for not only meeting the Sustainable Development Goals but also those envisaged in the Paris Agreement to deal with Climate Change. The imperative, globally is to strive for “sustainable development”.

In the last meeting of the leaders of the BRICS countries, the 8th BRICS Summit, which was held in Goa, India, leaders of the BRICS countries took a pledge that they would work together to “Build Responsive, Inclusive and Collective Solutions” to address issues in developing countries. However, the question that is perhaps still unanswered is whether the BRICS countries are indeed geared up to meet the requirements of putting their respective countries on a “Sustainable Development Pathway” and importantly, and specifically is the BRICS Bank – the “New Development Bank”, is well placed to act as a crucial engine for sustainable development?

In this context, and perhaps partially in answer to the question posed regarding the New Development Bank, it has, in its first year of operations, funded/supported over USD 1.5 Billion worth (Deccan Chronicle, dated 26/02/2017) of infrastructure and energy projects within the BRICS Countries. Furthermore, it is interesting to see that most of the approved projects are in the realm of clean energy solutions, such as roof top solar, wind etc., or are in the realm of supporting renewable energy such as grid infrastructure support projects for renewable energy. What is also important

The New Development Bank is now poised to reach out to other countries outside the BRICS for funding projects and it will be interesting to see, if the current practice of supporting only clean energy solutions and clean energy infrastructure in local currencies still remain.

to note is that these projects have been supported in domestic currencies as opposed to the USD and this new practice is being seen as a country friendly approach. While the bank has defined certain kind of investments as eligible for NDB financing, in the absence of a clear definition of sustainable development, it is possible that some projects that come under the category of “clean coal” for instance, could end up being financed by the Bank. If the NDB is going to be something new, it will need to break away from the hitherto followed approach of supporting extraction oriented model of development, which were pursued in the past, but have also caused immense destruction and environmental impacts of which climate change is one manifestation. However, there are now alternate pathways available that are more resource efficient and climate friendly, and therefore less destructive and more sustainable.

Further, while the NDB has a social and environmental framework, experts feel that these principles are more aspirational rather than concrete safeguards that could allow the monitoring of environmental and social performance standards of projects. Experts are also of the opinion that there are sufficient clauses within the existing NDB framework that could give room for the host country to waive off certain standards for certain projects. Further and importantly, based on a reading of its current policies, it does not appear that the bank has put in place adequate mechanisms that could address any adverse impacts of projects on host or local communities.

In addition to the above, what is also of concern is that the policy formulation of the NDB has neither been transparent nor participatory. It seems to appear that the Bank did not have any public consultations with any set of stakeholders and particularly civil society groups while formulating its policies.

In this light, and in order to provide civil society inputs to the NDB's policies and its frameworks, Vasudha Foundation in partnership with Oxfam and ASUL, Brazil, had embarked on a project that has two components. The first component is a research component that would compile various policies of existing International Financial Institutions, and other Development Banks, in order to create a "A compendium of policies and practices of some of the Multilateral and Southern Banks". The recommendations emerging from this compendium would help in persuading the NDB to have in place, policies that would ensure not only transparency in governance, but also ensure that the NDB promotes sustainable development as its core business.

Some of the key themes that we believe that the Bank needs to have policies are as below: The analysis of policies of other Development Banks is also based on policies pertaining to the below thematic areas.

Transformational Investments and Social Infrastructure

The policies of the Development Finance Institutions which are focusing on the agenda of accelerating sustainable development, eradicating poverty and to tackle climate change are widely considered to be 'Transformational'. Infrastructure investments which are driven towards growth, poverty reduction, environmental and social sustainability, that cater to the social service infrastructure needs of communities, could also be termed transformational. These social infrastructure assets include schools, universities, hospitals, prisons, community housings and transportation facilities.

Approach to Civil Society Consultation

Civil society consultations play a vital role in widening the participation of community of citizens in the member country and not just the Governments. This further advances shared goals and interests of public who are non-state actors and are part of non-government organizations (NGOs), professional associations, foundations, independent research institutes, community-based organizations (CBOs), faith-based organizations, people's organizations, social movements, and labour unions.

Internal Ombudsman and Grievance Redressal Policies

Internal Ombudsman and Grievance Redressal Policies are impartial dispute resolution or recourse mechanisms available for the customers, employees and other stakeholders. These are processes that allow any individual to file complaints and seek resolution of their dispute or their grievances regarding the policies or operations of a project funded by the IFIs.

Socio-Environmental and Accountability Frameworks

In the process of project selection and implementation, safeguarding the rights of affected people and their concerns as well protecting the environment and preserving the social and cultural resources is essential. Development finance organizations have developed 'pro' socio-environment policies and frameworks, that try to evaluate the negative impacts of the projects supported by them and take necessary mitigative actions on addressing social equity and environmental sustainability.

Gender Framework

The framework majorly focuses on the approach of various policies towards gender. These institutions have implemented policies, which help in focusing on narrowing and/or removing the socially constructed differences between men and women and the need to challenge existing gender roles. In addition to these policies, try to reduce the gaps in the unequal social structures to develop a framework through which the projects implemented/selected by these organizations specifically address gender issues and power relations thereby securing gender equality.

Project Selection, Criteria and Transparency

The project selection criteria deal with the process of filtering projects and eventually finalizing them for implementation based on the vision and programmatic focus of the IFIs. This also includes the accountability structures and safeguards to ensure symmetric information flow to the stakeholders and public at large. This transparency is assessed in relation to the quality of disclosure standards, emphasizing fullness of disclosure, accessibility to information, timeliness of information and availability of recourse mechanism.

Snapshot of Policies of the Selected IFIs for the Six Focus Themes

In order to get a better understanding of the selected focus themes, it is helpful to look at the policies and practices across the IFIs chosen for writing this paper. The matrix below highlights these policies in each of the selected banks eventually helping in identifying the best practices across the focus themes.

The choice of the Banks in the Matrix below is based on the presence of the mentioned Banks in one or more BRICS countries.

2.1. Transformational Investments and Social Infrastructure

World Bank	African Development Bank	Asian Development Bank	Inter-American Development Bank	Latin American Development Bank (CAF)	BNDES
<p>Investments in key social sectors such as health, education and pensions</p> <p>Dedicated anti-poverty programs such as safety nets</p> <p>Ensuring Social Welfare through Human Development thematic network that build infrastructure programs around Education, Health, Nutrition and Population related themes</p> <p>Ensuring Social Protection through Human Development thematic network which helps in supporting Social Protection Units which provide safety nets, social insurance, labour markets, vulnerable groups and social risk management</p> <p>Ensuring Social Development through Sustainable Development Network</p>	<p>AfDB has two objectives—inclusive growth and the transition to green growth</p> <p>AfDB seeks to do this by: Supporting fragile states to strengthen their economies by reducing significant proportion of its poverty</p> <p>Strengthening agriculture, food security and improve the livelihoods of Africans who live in rural areas</p> <p>AfDB is itself transforming to support transformation as an African organization serving Africans, it is a motor for economic progress and integration</p>	<p>Pursuing Poverty Reduction and Inclusive Economic Growth by achieving Positive Economic Impacts, Respecting Diversity and Equal Opportunity, and Equitable and Fair Labour Practices</p> <p>Promoting Infrastructure Development especially focusing on Energy, Emissions, Transport, etc.</p>	<p>Pursues Policies which create Jobs and Engages the Community in Latin American and Caribbean regions</p> <p>In the sector priority of Infrastructure for Competitiveness and Social Welfare, the bank has made considerable progress providing access to basic services such as Water Sanitation and Electricity</p> <p>Projects focusing on strengthening coordination as well as on rebuilding local forces in disaster prone and hit areas</p> <p>Focus on Electricity projects to create new opportunities. Focus on building Institutions for Growth and Social Welfare.</p>	<p>Over 70 percent of CAF loans went to projects related to physical infrastructure and projects that promote connectivity and integration within the region (including energy, water, and public mobility)</p>	<p>Enable efforts reflecting on socio-environmental development and better living conditions</p> <p>BNDES' social fund supports projects in health, education, urban infrastructure, financial support for low income entrepreneurs and projects that reduce regional inequalities in Brazil, are part of social commitment</p>

Comment

All of the above IFIs are involved in investing in projects that are focused on poverty reduction and/or enhancing social infrastructure. Much of the operational strategies and programmatic frameworks are influenced by country specific strategies and policies thereby leading to different approaches in different regions. Sectoral approaches also alter based on the countries and regions, for instance AfDB focuses more in enhancing agriculture infrastructure to ensure poverty reduction and development. Therefore, all IFIs have a transformative focus on social development that varies from region to region and/or across countries.

2.2. Approach to Civil Society Consultation

World Bank	African Development Bank	Asian Development Bank	Inter-American Development Bank	Latin American Development Bank (CAF)	BNDES
<p>By creating a Strategic Framework for Mainstreaming Citizen Engagement in World Bank Group Operations</p> <p>By having a dedicated Access to Information Policy (EXC4.01-POL.01)</p> <p>By creating CSO Policy forums meet in the Annual and Spring meetings with CSO dialogue sessions</p> <p>By creating CSO operational collaboration and institutional partnership</p>	<p>By ensuring CSO Involvement in Formulation of Bank Policy</p> <p>By ensuring CSO Involvement in the Formulation of Country-Level Policies, and Bank-Supported Projects Formulation and Implementation</p> <p>By ensuring CSO participation in the formulation of Country Strategy Papers</p>	<p>By creating a Policy on cooperation between ADB and NGOs working in areas like loan and technical assistance activities, programming and country-level work, and policy development</p> <p>By creating an NGO-Civil Society Centre and Inter-departmental network of NGOs/CSOs</p> <p>By drafting a sound Public Communication Policy (PCP) of ADB (PCP 2011: Disclosure and Exchange of Information)</p>	<p>By promoting collaboration with civil society through its initiative on Civil Society for Innovative Solutions</p> <p>By adding human capital to development by training CSOs in its program "Civil Society: Institutional Capacity"</p> <p>By advancing the common agendas of development and shared value with expert CSOs</p> <p>By creating a CSO network in each of the 26 countries known as Civil Society Consultative Groups (ConSoC)</p>	<p>There is no well-defined policy document available for defining CAF's strategy in citizen or CSO engagement</p> <p>However, there are several programmes and initiatives being undertaken to build capacity of governments and civil society leaders in participating in financial, economic, political and social decisions vis-à-vis policies</p>	<p>No dedicated policy or strategy for civil society engagement</p> <p>But there is a mention of civil society in the Governance practices with respect to public governance practices and the involvement of civil society as part of the advisory board to approve, examine and counsel in the bank operations</p> <p>Further, a mention of the role of civil society in guiding the sustainable purchase policy of the bank</p>

Comment

Active engagement of civil society in policy making and various programme aspects of the IFIs is to ensure better governance and inclusion of voice of non-state stakeholders. All the above institutions have some framework of CSO engagement but much needs to be done to integrate this inclusive approach on the implementation front.

2.3. Internal Ombudsman and Grievance Redressal Policies

World Bank	African Development Bank	Asian Development Bank	Inter-American Development Bank	Latin American Development Bank (CAF)	BNDES
<p>Internal Justice Service (IJS) covers issues like counselling, formal review of concerns, justice at workplace, etc.</p>	<p>Staff Recourse Mechanism part of the Independent Review mechanism (IRM) by the Enabling Resolution B/BD/2004/9-F/BD/2004/7</p>	<p>'Our People's Strategy': workforce and community strategy of ADB</p>	<p>Governed by Code of Ethics and Professional Conduct</p>	<p>CAF doesn't have a clear accountability mechanism defined in the public domain- both for the community and the employees</p>	<p>Ombudsman office is responsible for addressing internal and external concerns</p>

2.3. Internal Ombudsman and Grievance Redressal Policies

World Bank	African Development Bank	Asian Development Bank	Inter-American Development Bank	Latin American Development Bank (CAF)	BNDES
<p>IJS include mediation services (Staff Rule 9.01), ombudsman service (Staff Rule 9.02) and peer review services (Staff Rules 9.03)</p> <p>Ombudsman service includes Respectful Workplace Programme where the Respectful Workplace Advisors (RWAs) help the staff in handling workplace situations and provide counselling on escalating issues that cannot be settled informally</p> <p>External Grievance Redressal Grievance Redress Service (GRS): for individuals and communities in getting better redress for their complaints</p> <p>Office of the Compliance Advisor/Ombudsman (CAO) is independent recourse mechanism for projects supported by the International Finance Corporation (IFC) and Multilateral Investment Guarantee Agency (MIGA)-the private sector lending arms of the World Bank Group</p> <p>Compliance review has similar procedural cycle as the GRS</p>	<p>External Grievance Redressal IRM - comprehensive mechanism for grievance redressal for parties affected by AfDB projects</p> <p>This is undertaken through independent fact finding, mediation, conciliation, dialogue facilitation taking into consideration best customary practices for handling complaints</p> <p>Compliance Review and Mediation Unit (CRMU) shall monitor the implementation of agreements reached by parties in a problem-solving exercise</p> <p>The IRM Experts shall conduct compliance reviews with administrative and technical support from CRMU</p> <p>IRM shall carry out its advisory function in a transparent manner and ensure the disclosure of finalized Advisory Notes</p>	<p>Office of Anticorruption and Integrity looks in to employee grievance informally through its new Respectful Workforce Unit set up in 2016</p> <p>ADB also has an Ombudsperson's Unit</p> <p>Ombudsperson function: informal independent grievance procedure for staff members</p> <p>Ombudsperson may also give advice and make recommendations for the improvement of the overall working environment in ADB</p> <p>Eventually the Administrative Tribunal handles formal cases of employee grievance</p> <p>External Grievance Redressal Accountability Mechanism provides forum for external grievance redressal</p> <p>Governed by Accountability Mechanism Policy, 2012</p> <p>Has two separate offices: Office of the Special Project Facilitator (OSPF) and Office of the Compliance Review Panel (OCRP)</p>	<p>All mediation processes are conducted in accordance with the stipulations outlined in the respective staff rules</p> <p>Office of Ethics, HR Department, Office of Mediation and Office of Ombudsperson look after the internal grievance redressal</p> <p>Ombudsperson and Mediation Secretary provide independent and confidential resolution to employee grievance</p> <p>External Grievance Redressal Independent Consultation and Investigation Mechanism (MICI) of the IDB governs the grievance redressal</p> <p>MICI teams contains Roster of Experts with diverse expertise and nationalities for impartial and transparent redressal</p>	<p>CAF has no independent body to address complaints by populations adversely affected by its loans</p>	<p>However, there is no clearly spelled out policy or procedure for employee grievance handling</p> <p>External Grievance Redressal Ombudsman Office responsible for Grievance Redressal</p> <p>Functions as per Resolution DIR 2980/2016-BNDES</p> <p>Ombudsman's Office complies with the provisions of CMN Resolution 4433/2015, which provides that conclusive responses to the protesters should be sent within 10 business days</p>

Snapshot of Policies of the Selected IFIs for the Six Focus Themes

World Bank	African Development Bank	Asian Development Bank	Inter-American Development Bank	Latin American Development Bank (CAF)	BNDES
		SPF: First step of complaints registration and the ensuing cycle of fact finding, problem solving, implementation and M&E CRP: If complaints are not resolved through problem solving, compliance review can be requested by aggrieved parties			

Comment

All the above institutions have some form of external and internal grievance redressal mechanism in place varying from very structured compliance review to informal conflict management. This lays emphasis on the importance of evaluating the unforeseen impact of the Banks' operation both on its employees and the intended beneficiaries. The informal approach for conflict resolution forms the first choice of all these institutions as it involves lesser resources.

2.4. Social, Environmental and Other Accountability Frameworks

World Bank	African Development Bank	Asian Development Bank	Inter-American Development Bank	Latin American Development Bank (CAF)	BNDES
<p>There are policies on Environmental Assessment (OP/BP 4.02), Environment Action Plans (OP/BP 4.03), Natural Habitats (OP/BP 4.07), Water Resource Management (OP/BP 4.09), Indigenous Peoples (OP/BP 4.11), Physical Cultural Resources (OP/BP 4.12), Gender and Development (OP/BP 4.36), Forests (OP/BP 4.37) and Safety of Dams (OP/BP 4.76) New Environmental and Social Safeguards – (Will be in effect from 2018)</p> <p>Apart from this, the Bank has developed a variety of effective environmental and social assessment tools appropriate for upstream assessment, including Strategic Environmental and Social Assessment (SESA), Sectoral Environmental Assessment (SEA), Regional Environmental Assessment (REA), among others</p>	<p>There are Environment and Social Assessment Procedures (ESAP) for AfDB's Public Sector Operations:</p> <p>Formalise the use of Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP) and Environmental and Social Audits as instruments to enhance project benefits and (in order of priority) to prevent, minimise, mitigate, or compensate for adverse impacts throughout project life cycle</p> <p>Detailed ESA process and project cycle with steps and responsibilities for each organization</p>	<p>There are 3 operational policies on Environment, Involuntary Settlement and Indigenous peoples</p> <p>The safeguard policies require that, Impacts are identified and assessed early in the project cycle</p> <p>Plans to avoid, minimize, mitigate, or compensate for the potential adverse impacts are developed and implemented</p> <p>Affected people are informed and consulted during project preparation and implementation. These policies apply to all ADB-financed projects, including private sector operations, and to all project components.</p> <p>ADB also has processes for monitoring projects' compliance with its safeguard policies</p>	<p>According to the Environment Policy (OP-703) Preparation of Environmental Assessments (EA) and associated management plans and their implementation are the responsibility of the borrower</p> <p>The Bank will require compliance with specified standards for Environmental Impact Assessments (EIAs), Strategic Environmental Assessments (SEAs), Environmental and Social Management Plan (ESMP), and environmental analyses, as defined in this Policy and detailed in the Guidelines. Based on the categories of the risk and opportunities the above assessment is done. This gives in a check on the Transboundary Environmental and Social Impact analyses.</p>	<p>These are policies for Environmental and Social Assessment, Environmental and Social Management Plan (for CAF/GEF Projects) Natural Habitats and Forests Management, Involuntary Settlement, Socio-Economic Assessment in case of projects involving Indigenous People, Pest management, Physical and Cultural Resources Management Plan, And places for Safety of Dams</p>	<p>There are processes for ensuring accountability in line with current Brazilian legislation and public policies, in particular with the provisions set out in the National Environmental Policy and, abroad, with the laws applicable in each country; Detailed Frameworks and Instruments to blend and robust research of the Environment and Social Impacts done by the beneficiaries as well as by the Bank Preliminary and Cadastral research done about the beneficiary, enterprise and analysis of the Socio-environmental impacts and sectoral analysis</p>

Comment

All the selected IFIs have environmental safeguards at various levels (regional, country specific, etc.). This helps in undertaking the social as well as environmental impact analysis and/or assessment of the planned and ongoing projects. The IFIs through their policies and practices, acknowledge the importance of integrating social and environmental aspects in their operations, by enabling full disclosure of project information and statistics.

2.5. Gender Framework

World Bank	African Development Bank	Asian Development Bank	Inter-American Development Bank	Latin American Development Bank (CAF)	BNDES
<p>(OP/BP 4.20) is Gender and Development policy framework</p> <p>Gender mainstreaming approach is embedded across various policies of the Bank such as country level strategies, poverty reduction, development cooperation, etc.</p> <p>Five of the policies in the framework, contain direct, explicit instructions on how Bank staff are to integrate attention to gender issues (or to specific groups of women or men) in their work¹</p> <p>The other policies are also very relevant because they discuss Bank work, instruments, or cross-thematic topics through which the mainstreaming of gender issues is implemented</p>	<p>AfDB's Group's Strategy 2013–2022 recognises the need to reduce gender inequalities</p> <p>Priority areas for gender equality have been defined and agreed in broad consultations with African countries, and form the pillars of the Bank's Gender Strategy for 2014–2018</p> <p>The focus of this strategy is twofold: First, it seeks to strengthen gender mainstreaming in all of the Bank's country and regional operations and strategies. Second, it addresses the Bank's own internal transformation to make it a more supportive, gender-responsive institution.</p>	<p>Gender equity: one of the five drivers of change in ADB's Strategy 2020</p> <p>Gender equality and women's empowerment operational plan, 2013-2020 emphasis on participation of women & men in decision making, poverty reduction and gender inequality</p>	<p>Operational policy on gender equality and development</p> <p>This Policy identifies two lines of action: (i) proactive action, which actively promotes gender equality and the empowerment of women through all the Bank's development interventions; and (ii) preventive action, which introduces safeguards to prevent or mitigate adverse impacts on women or men due to gender resulting from the Bank's actions through its financial operations</p>	<p>Policies and procedures of CAF, aim to ensure that Project Environmental and Social Assessment (ESA) include Gender Analysis (GA)</p> <p>This analysis determines: (i) if socioeconomic benefits generated by the project are culturally adequate and generationally inclusive, both for women and men; (ii) if project generates different impacts and risks for women and men; (iii) an action plan comprising necessary measures to prevent, mitigate and/or compensate such impacts and risks</p>	<p>The Gender Equity and Valorisation of Diversity Policy</p> <p>Art. 1 reaffirms the permanent commitment of the BNDES System to contribute to the elimination of all forms of inequality and discrimination in its working environment and in the institutions that participate in its relationship chains</p> <p>Art. 2 For the BNDES System, valuing diversity encompasses the respect for the life and dignity of every human being, considering all of types of manifestation of differences, genders and sexual orientations, races and ethnicities, religions, cultures, political beliefs, among others</p>

Comment

The IFIs have gender equity ingrained in its various focus areas like poverty reduction, infrastructure development, etc. This shows the importance that these institutions lay on achieving gender equality and mainstreaming.

¹Those policies are: 1) OP/BP 4.20 on gender and development; 2) OP 2.30 on development cooperation and conflict; 3) OP/BP 4.10 on indigenous peoples; 4) OP/BP 4.12 on involuntary resettlement; and 5) OP/BP 4.36 on forest

2.6. Project Selection, Criteria and Transparency

World Bank	African Development Bank	Asian Development Bank	Inter-American Development Bank	Latin American Development Bank (CAF)	BNDES
<p>Project section based on six step criteria: Finalisation of country partnership framework- Identification of project through proposals submitted by borrowing country²</p> <p>Project appraisal undertaken to analyse project's business case for 'go or a no go'</p> <p>Board Approval undertaken to set the expectation of the project and the outcome it intends to achieve</p> <p>Programme implementation and M&E cycle begins once the project starts rolling</p> <p>All approved WB projects, then have to confer to the Project Procurement Policy (OPSVP5.05-POL.144)</p> <p>Access to information policy (EXC4.01-POL.01) allows the bank to disclose the information not classified under exception</p> <p>Overtime, the bank also discloses information that fall under exceptions.</p>	<p>Well defined project cycle in place covering the following steps: Project Identification: based on country strategy and agreed operational programme of the borrowing country. Implementation partners are agreed between AfDB and borrowing country</p> <p>Project Appraisal: AfDB Group examines project feasibility. Involvement of state and non-state stakeholders to assess social, economic, environmental impacts and feasibility</p> <p>Loan Negotiation allows to define the boundaries of the project vis-à-vis funds and outcomes, procurement methods during the project, project executing agencies, etc.</p> <p>Board approval – project's business case presented where final goals are set</p> <p>AfDB has Disclosure and Access to Information Policy (DAI). DAI was revised and approved by the Board on May 2, 2012 (Addition-access to information to broad range of stakeholders and limit the number of exemptions).</p>	<p>Stepwise criteria for project selection</p> <p>Country Partnership strategy (CPS): Development of CPS in consultation with country level stakeholders Project Identification / Preparation: Once the project is shortlisted for funding, a flagging exercise -called an initial poverty and social analysis-is conducted to identify those people who may be beneficially or adversely affected</p> <p>Project approval includes loan negotiation, board approval, loan signing and loan effectiveness. The project plan is approved that includes the project goals, outcomes, implementation plan, procurement plans, timelines, project partners, etc.</p> <p>Project then enters the implementation stage managed through periodic M&E</p> <p>Public Communications Policy, 2011 states out rules and guidelines for the sharing of information for the public</p> <p>ADB has an independent Appeals Panel to ensure the credibility of the appeals apart from having a Public Disclosure Committee</p>	<p>Project cycle includes: Preparation: IDB and the borrowing country develop country strategies. The results of these tasks are developed into a Project Profile (PP)³</p> <p>Eligibility Review Meeting (ERM): PP is evaluated at ERM – project's eligibility, operation, timelines, resource requirements, etc.</p> <p>Proposal for Operations Development (POD): specifies activities, resources, timetable necessary for M&E. Includes Development Effectiveness Matrix (DEM), M&E and Economic Rate of Return (ERR).</p> <p>Draft Loan Proposal (DLP) prepared for Operations Policy Committee (OPC) for approval. Once approved, project team proceeds to distribute the document for Board.</p> <p>Board Approval: Once approved, loan contract can be signed by the borrowing member country</p> <p>Transparency and accountability part of mandate (GA-232-38 and GN-2117-2) and the sectoral priorities of growth and social welfare (AB-2764)</p>	<p>CAF does not have formal conditions for project selection</p> <p>Instead, it undertakes a rigorous economic evaluation of projects to be financed and approves the loans quickly</p> <p>This enhances ownership of the development policy within borrowing countries, reflecting the priorities of developing countries</p>	<p>The BNDES finances projects based on criteria that prioritize development with social inclusion, creating jobs and income. The Bank's operations cover most economic activity sectors.</p> <p>Below is the process: Based on previous consultation with the borrowers. Department of Priorities (DEPRI) of Planning Division receives the request</p> <p>Operational Divisions analyse the request. Projects are classified in sections based on departments: Foreign Trade Division (AEX), the Infrastructure Division (AIE) and the Industrial Division (AI).</p> <p>Board presentation and project analysis happens for approval</p> <p>Once the approved the loan is disbursed</p> <p>Law on Access to Information No. 12,527 / 2011</p> <p>Citizen Information System (CIS) under the law mandates project's financial and operational disclosures</p>

²Identification is based on criteria like the relevance to the current economic situation of the country, region of project implementation, cost benefit component of the project, sector of relevance, etc.

³PP provides basic information on the project, including its justification and objectives, the technical aspects and its relevant sector background, the proposed environmental and social safeguards, a fiduciary evaluation, the projected funding amounts, and a preliminary agenda for the project's execution

Snapshot of Policies of the Selected IFIs for the Six Focus Themes

World Bank	African Development Bank	Asian Development Bank	Inter-American Development Bank	Latin American Development Bank (CAF)	BNDES
			New Access to information Policy in January 1, 2011 (OP-102). General principle- publicly disclose information unless one of the ten exceptions listed in policy is applicable.		

Comment

The project selection criteria are similar across the IFIs. The process starts with programmatic focus as per the country strategy and approval from the respective Board of Directors. The stages of the project life cycle are provided as public disclosure, for the external stakeholders.

Case Studies for Selected Objectives

This section highlights specific Banks and their policies and practices under each of the six selected focus themes in this paper. These specific cases would be useful in highlighting the various policies and practices examples that the New Development Bank (NDB) could consider while drafting its policy frameworks.

Focus Themes	Name of the Bank	Nature of the Bank
Transformational Investments and social Infrastructure	World Bank Group (WBG)	International Financial Institution (IFI)
Approach to civil society Consultation	Asian Development Bank (ADB)	International Financial Institution (IFI)
Internal Ombudsman and grievance redressal policies	African Development Bank (AfDB)	International Financial Institution (IFI)
Social- Environmental and accountability frameworks	World Bank Group (WB)	International Financial Institution (IFI)
Gender Framework	Inter-American Development Bank (IADB) and World Bank	International Financial Institution (IFI)
Project Selection, Criteria and Transparency	Asian Development Bank (ADB)	International Financial Institution (IFI)

Caveat: The narrative below does not indicate that Vasudha Foundation, Oxfam India or ASUL, Brazil endorse any of the specific policies of the IFIs vis-à-vis the others. Further we also acknowledge that a number of these institutions have certain policy components that are more robust. The aim is to have diversity in the study and the final recommendations have included policy components that are not necessarily covered in the policies examined.

3.1. Transformational Investments and Social Infrastructure – World Bank

3.1.1. The World Bank has a diverse set of policies which are transformational in nature and are driven by social agenda. The salient features of the key policy contributions, strategies and frameworks that attribute to such transformation are:

- Investments in key social sectors such as health, education and pensions
- Dedicated anti-poverty programs such as safety nets
- The application of analytical tools in the operations such as social assessments, poverty and social impact analysis and environment, forests and natural resource aspects on the same
- Sound social safeguards which are designed to mitigate the potentially harmful consequences of infrastructure projects

The key policies and guiding principles

Development Policy Financing (DPF) (OP 8.60)

The World Bank through its DPF supports a member country's program of policy and institutional actions that promote growth and sustainable poverty reduction. With the policies on DPF as guiding principle, varied strategies are devised to produce actionable outcomes. The policy enumerates the relevant analytic work drawn on Member Country's sectoral, economy wide and institutional policies (Para 8) in order to prepare the operation.

Program-for-Results Financing (PfRF) (OPCS5.04-POL.01)

aims to promote sustainable development and improve the efficiency and effectiveness of expenditures by financing specific development programs; by adequately addressing the environmental and social impacts; and by strengthening the program systems, institutional capacity and disbursing funds on the basis of achievements of key results. The PfRE bank policy resonates a sound policy on detailed Environment and Social systems assessment of the particular country, sector or program circumstances which ensures minimizing, mitigating or avoiding adverse impacts and promotes informed decision making related to program's environmental and social impacts. This avails special attention to the concerns of Indigenous people and workers' rights, natural hazards, natural resources, restoration of livelihood and living standards as well as on land acquisition and displacement factors (Para 8).

Other Policies

The bank has other policies such as Poverty Reduction policy (OP 1.00) which focuses dedicatedly on the bank's mission of sustainable poverty reduction which includes detailed poverty assessments and employment guarantee programs, pension programs, social protection programs and social infrastructure investments on health, education, transport, housing, water and energy access initiatives. The other policies guiding Investment Project Financing considers the assessment of and reduction of environmental and social risks relating to the operations. Further, the bank has operational and bank policies (OP and BP) in place for Environmental Assessment (OP/BP 4.02), Environment Action Plans (OP/BP 4.03), Natural Habitats (OP/BP 4.07), Water Resource Management (OP/BP 4.09), Indigenous Peoples (OP/BP 4.11), Physical Cultural Resources (OP/BP 4.12), Gender and Development (OP/BP 4.36), Forests (OP/BP 4.37) and Safety of Dams (OP/BP 4.76).

The World Bank has dedicated "Social Development Department" as part of the World Bank Group who use various tools for social analysis such as Social Analysis of Investment Lending – Examining the impacts of bank supported operations on special groups, Poverty and Social Impact Analysis (PSIA)- An Analytic tool to find the distributional impacts of operations especially keeping the poor and vulnerable in focus, Country Social Analysis – A macro level analysis of a country's political and social context and Country Gender Assessment- Approach used to improve operations' understanding of the role gender issues play in a country's development context at all phases of the project life cycle.

3.1.2. Implementation Gaps in the Social Infrastructure and Transformational Investment Lending Policies of World Bank

According to Bank Information Centre's⁴ analysis of the policy gaps - the traditional infrastructure investments on development projects follow the safeguard policies to manage environmental and social risks associated with the specific projects. The most important aspect of the infrastructure investments is that the safeguards can be monitored by the civil society organizations. However, in the Development Policy and Program-for-results financing, the coverage of these safeguards is still ambiguous and very difficult to be monitored by the civil society. The non-infrastructure lending practices of the bank, in spite of using robust assessment tools, are quite behind in the process of implementing the full and systematic consideration of the application of safeguards that cover the extent of bank activities. The debate on the Bank's safeguards, as opposed to the Borrower country's national safeguards and local laws, has been an ongoing one. The country strategy, that encourages the reliance on the local laws for the implementation of the Bank's development projects provides greater country ownership of the project. Yet, there is a need for the bank to devise a common minimum standard which can assess the socio-environmental as well human rights implications of the projects and investments for building social infrastructure and the development policy financing with a common ground.

Thus, World Bank in its social infrastructure investments and in lending practices, should involve the vision of transformation not just as an aspirational one but as a binding commitment. The World Bank being one of the foremost Multilateral Financial Institutions must pioneer in its effort to build mechanisms that would enable transitioning of sound policies statements to leverage safe and sound implementation.

3.2. Approach to Civil Society Consultation- Asian Development Bank (ADB)

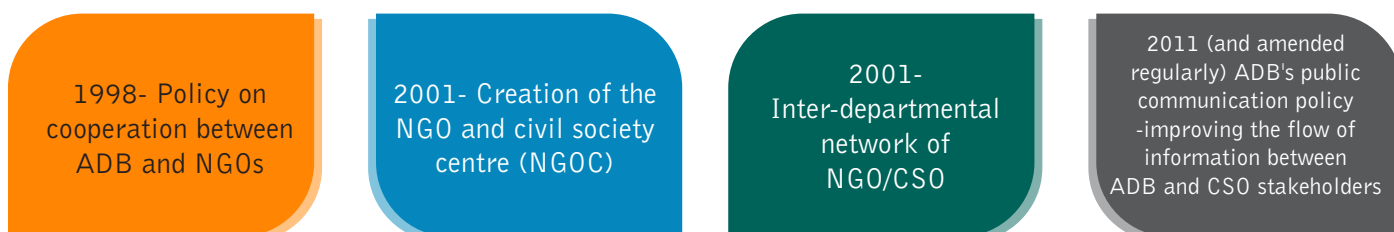
3.2.1. The ADB recognizes the significance of the role played by the civil society in the social, economic and democratic development of Asia and Pacific region. The ADB considers CSOs roles to:

- Provide information and perspectives from the field and local communities
- Function as sources of exemplary practices and specific experience
- Disseminate ADB information
- Act as a bridge in ADB's relationship with member governments and civil society
- Help manage the flow of information used in the formulation of ADB strategies
- Provide technical assistance and related services in the preparation of country strategies, national poverty strategies, as well as project identification, design, monitoring, and evaluation
- In the case of pilot projects, implement ADB-assisted development interventions, and in particular, poverty reduction projects and social initiatives

I) Policy on Cooperation between ADB and NGOs

The core policy of ADB for NGO cooperation, identifies three broad areas of association with NGOs including cooperation in loan and Technical Assistance (TA) activities, programming and country-level work, and policy development. This policy considers cooperation as a dynamic process that involves building a relationship between NGOs, ADB and the governments at country level for institutional development and capacity building and in turn would help in ADB's poverty reduction strategies.

The ADB has long interacted with Civil Society Organizations (CSOs) in the following ways:



⁴<http://www.bankinformationcenter.org/our-work/safeguards/>

II) NGO-Civil Society Centre and Inter-departmental Network of NGOs/CSOs

In view of ADB's engagement with the CSOs, the NGO-Civil Society Centre (NGOC) was launched in the year 2001. It works closely with an institution wide CSO cooperation network to support the CSO participation in the bank's activities. The NGOC is a part of the ADB's Public Management, Governance, and Participation Division of the Regional and Sustainable Development Department (RSDD). The NGOC since its inception had conducted several CSO consultations and has released Civil Society Briefs in all the countries where the ADB projects are operational. The major functions of NGOC is to act as a platform for knowledge sharing of CSOs (policy experiences, current issues of interest for ABD, etc.) and to act as a liaison between CSOs and ADB, among others.

III) Public Communication Policy (PCP) of ADB (PCP 2011: Disclosure and Exchange of Information)

ADB follows a proactive disclosure of information and knowledge through the websites as well as other means. It provides people the right to access information and provide it in a time bound manner. Also, country ownership is respected and thus certain documents will be disclosed after considering the views of developing country members with regard to content as well as timing of disclosure (para i, ii, iii). The bank policy also follows the principle of limited exceptions. This flow of information helps in strengthening partnerships with NGOs and CSOs through transparency.

IV) Other Practices followed by ADB in Engaging with CSOs in Policy Development are,

- By undertaking stakeholder analysis to determine which groups or individuals will best contribute to the review process
- By conferring with internal and external groups that possess specialized knowledge or have a particular interest in the policy or strategy being developed or reviewed
- By creating a website dedicated to the review process that widely publicizes details relating to the methodology and way forward for the policy review and subsequent consultations
- By making at least two drafts of the proposed policy or strategy available for public comment during the course of the review, and allow stakeholders sufficient time to comment on the drafts
- By organizing several face-to-face consultations relating to the draft policy or strategy at the country or sub regional level in a geographically diverse set of member countries
- By carrying-out website, electronic, and postal consultations in parallel with face-to-face consultations
- By posting stakeholder comments on the website dedicated to the review process, with an explanation for the comments being considered (e.g., by preparing a comments matrix)
- By promptly posting any changes to the review process on the dedicated review website (e.g., details relating to workshop arrangements, extensions of the review process)

3.2.2. Issues with the Civil Society Engagement of ADB

Despite the existence of relatively strong policies and norms on civil society participation, there are certain inherent limitations when it comes to the actual implementation of the policies. The depth of the access as well as the range of CSOs within ADB are somewhat limited. The identification of the civil society and the political opportunities provided to them within ADB to influence their policy and project decisions are considered to be shallow predominantly. As per a recent study (Uhlin, 2016) there have been some concerns on the categorization of 'useful' civil society groups or NGOs, that it limits to those who are being less critical or relatively uninformed. It had been observed that though there was access to ADB's NGO Forums, the inclusion of NGOs and their suggestions in policy advocacy and review had been limited to the listed useful CSOs. Additionally, it has been observed that even though such policies provide space and opportunity, they are lacking in political purpose as are poorly institutionalized; limited to staff and resource availability. The dependency on country systems to identify and suggest NGOs are also limiting the depth of the engagement at times as the inherent biases between the State and certain civil society groups or NGOs are a popular phenomenon in South Asia⁵.

⁵Book on "Civil Society and Regional Governance, The Asian Development Bank and Associations of Southeast Asian Nations" by Anders Uhlin published by Lexington Books. 2016

<https://books.google.co.in/books?id=84c1DQAAQBAJ&pg=PA74&ots=KPNlL22dc&dq=Issues%20with%20ADB's%20civil%20society%20engagement&pg=PA72#v=onepage&q=Issues%20with%20ADB's%20civil%20society%20engagement&f=false>

3.3. Internal Ombudsman and Grievance Redressal Policies – African Development Bank (AfDB)

3.3.1. The Ombudsman Unit of AfDB is an internal, independent, confidential and informal assistance mechanism available for all the staff on grievances and complaints related to work place problems and issues of human resources. The unit reports directly to the President. The Unit uses mediation and conciliation means or any other appropriate means to settle disputes neutrally between staffs or between staff and the management. The ombudsman has no formal decision making power and can only advice and make recommendations to the President and affected managers or staff.

Key Interactions of the Ombudsman Unit



I) Independent Review Mechanism of the African Development Bank

The Independent Review Mechanism (IRM) was established by the AfDB in 2004 to address complaints made by any group of two or more people who have been harmed, or who are likely to be harmed, by a project funded by the AfDB Group. The IRM was designed to make sure that the AfDB follows its own policies and procedures during the design and implementation of its projects. Complaints may relate to the social and environmental impacts of projects in sectors ranging from transportation, hydropower, agriculture or infrastructure.

Overall Strategic Considerations

- Consider the benefits of a complaint, as well as limitations of the IRM, and set appropriate expectations.
- Consider whether another strategy might be more effective or efficient. Using the IRM is most effective when combined with other strategies, including: engaging with the media; seeking campaign support from other organisations; government advocacy; or other tactics.
- Understand the time and resources required to complete the IRM process, which might take several years.
- Consider whether beginning an IRM complaint process could place the affected group at risk of retribution or intimidation.
- Consider the need for confidentiality and develop a strategy in advance about how to address risks.

Functions of IRM

The IRM has three functions:

- Compliance review focuses on non-compliance with the Bank's operational policies and procedures (the ISS) in the design, implementation or supervision of a project.
- Problem-solving is used to resolve the issues raised in a complaint by encouraging the parties involved (complainants, AfDB Management, project company or any other parties) to reach agreement on a solution.
- Through its advisory functions, the IRM provides opinions on systemic issues related to the social and environmental impacts of Bank projects and performs spot check reviews to assess the compliance of specific high-risk projects with AfDB policies

Process of IRM

Program Solving

- Director conducts eligibility assessment - both parties interested in the process or not
- Initiation of dialogue and fact finding between the involved parties including the Bank
- Results of assessment presented to President and Board of Directors - highlights the issues and whether the issue is eligible for compliance review
- President and Board either accepts or rejects the problem solving

Compliance Review

- Once compliance is approved, IRM Roster of Experts conduct an investigation to evaluate any violation of AfDB policies during projects design, implementation and supervision
- Investigation report submitted to President and Board with analysis and recommendations
- 90 days for preparing response and plan of action for recommendation implementation to the Bank Management
- Presentation of action plan jointly by the CRMU and Bank Management
- President or the Board might accept and reject the findings and recommendations
 - Decision is published on the website

3.3.2. Gaps in the Implementation of the IRM and Grievance Redressal Mechanism of African Development Bank

The grievance redressal mechanism and the IRM mechanisms are ineffective because these mechanisms are not independent or autonomous in nature.

The report 'The Glass Half Full?' which reviews the state of accountability in Development Finance mentions on AfDB's IRM process's lessons learnt that "the Boards shall review the IRM every four (4) years, or as otherwise decided by the Boards. The IRM became operational in 2006, and since then there have been two reviews, one in 2009 and one in 2014. As a practical matter the reviews allow for public consultation, although to date, consultations have been ad hoc and procedures are not formalized in the IRM Rules. In the most recent review, initially, only the consultant's report was disclosed for CSO comment. CSOs had to request the disclosure of the draft rules and additional time for comment, which was granted. In terms of capturing lessons learned from its cases, the Expert Panel advised the Bank Group to prevent policy violations in the future"⁶.

The IRM is often criticized as a mere fact finding exercise, as they do not guarantee any results to the complainant or to the affected communities who file for the appeal or prevention of such harms in the AfDB's future support. The process is a weaker one in the sense that it cannot mandate the company who is involved in the implementation of the project to participate as it is a voluntary problem solving mechanism and the process terminates once the company is not willing to engage in the mechanism. The attributions of 'guilt' or 'blame' are not considered and there is no guarantee for a detailed investigation process⁷.

3.4. Socio-Environmental and Accountability Frameworks – World Bank Group

3.4.1. The New Environmental and Social Framework (ESF)

On August 4, 2016, the World Bank's Board of Executive Directors approved a new Environmental and Social Framework (ESF). The new ESF is the result of lengthy consultations that began in 2012 and were held with nearly 8,000 stakeholders, including governments, development experts and civil society groups, in 63 countries.

⁶Brochure of Human Rights and Grievance Mechanism Programme, "The Glass Half Full?, The State of Accountability in Development Finance" by The Centre for Research on Multinational Corporations (SOMO) published in January 2016. <http://grievancemechanisms.org/attachments/glass-half-full/view>

⁷Brief overview of the work of the AfDB's Independent Review Mechanism by The Centre for Research on Multinational Corporations (SOMO) and Accountability Counsel (<https://www.somo.nl/independent-review-mechanism-african-development-bank-2/>).

Case Studies for Selected Objectives

In the ESF, ten Environmental and Social Standards (ESSs) have been proposed for IPF. They cover a number of issues, from inputs provided by the shareholders, stakeholders, and WB staff during the review and update process. ESSs establish the borrower's responsibilities under the OP 10.00 (Investment Project Financing), of providing protection for people and environment for WB supported projects to provide adequate protection for people and the environment.

WB through the new ESF, has proposed extensive and ambitious changes to the application of safeguards, specifically concerning timing and responsibilities. Below are the three main changes that the WB has proposed in the new ESF:

- More attention is being focused on the efforts in designing project implementation, monitoring and compliance. This is a shift from the earlier practice of ex-ante assessment for gaining approvals.
- More attention to country ownership of the projects, wherever possible, to enable better attention to application of socio-environmental safeguards.
- a new stress on "flexibility", which would enable changes to be made to safeguard application as projects develop over time.⁸

In the policy document of the ESF, the WB management has laid stress on capacity building internally and for external stakeholders for its implementation. Keeping this in mind a phase wise implementation of ESF has been envisaged. A preparation phase of at least 15 months, a launch phase of approximately 6 months, an embedding phase of approximately 2 years, and a new steady operational state thereafter. It is also envisaged that the safeguard policies would run in parallel to the ESF for approximately seven years after the launch of the ESF, until all projects approved under the safeguard policies had closed⁹.

3.4.2. Socio-Environmental Assessment Practices before ESF

Operational Polices and Bank Procedures for environmental assessment of WB financed projects were introduced in 1989 as Operational Directive (OD) 4.01 in 1991. The Bank adopted an involuntary resettlement policy as an Operational Manual Statement in 1980, which was revised as OD 4.30 in 1990. Other environmental and social policies were added over time to address individual environmental and social risks.

WB listed ten policies as safeguard policies and called them as 'do no harm'. Through this it started a process of conversion for these policies. The safeguard policies (see table below) consist of six environmental, two social, and two legal policies.⁹

World Bank Environmental and Social Safeguards and their Policy Objectives

OP/BP	Safeguards	Policy Objective
4.01 (Environmental)	Environmental Assessment (1999)	Help ensure the environmental and social soundness and sustainability of investment projects. Support integration of environmental and social aspects of projects in the decision-making process.
4.04 (Environmental)	Natural Habitats (2001)	Promote environmentally sustainable development by supporting the protection, conservation, maintenance, and rehabilitation of natural habitats and their functions
4.09 (Environmental)	Pest Management (1998)	Minimize and manage the environmental and health risks associated with pesticide use and promote and support safe, effective, and environmentally sound pest management
4.10 (Social)	Indigenous Peoples (2005)	Design and implement projects in a way that foster full respect for indigenous peoples' dignity, human rights, and cultural uniqueness and so that they (1) receive culturally compatible social and economic benefits, and (2) do not suffer adverse effects during the development process

⁸Excerpt from a report titled Analysis of Proposed Changes to the World Bank's Safeguard Policies by Netherlands Commission of Environment Assessment, 2015 (http://api.commissiener.nl/docs/os/i71/i7144/su01-59_analysis_proposed_changes_to_wb_safeguard_policies.pdf)

⁹Implementation: https://consultations.worldbank.org/Data/hub/files/consultation-template/review-and-update-world-bank-safeguard-policies/en/materials/board_paper_for_es_framework_third_draft_for_disclosure_august_4_2016.pdf

Case Studies for Selected Objectives

OP/BP	Safeguards	Policy Objective
4.11 (Environmental)	Physical Cultural Resources (2006)	Assist in preserving PCR and in avoiding their destruction or damage. PCR includes resources of archaeological, paleontological, historical, architectural, religious (including graveyards and burial sites), aesthetic, or other cultural significance)
4.12 (Social)	Involuntary Resettlement (2001)	Avoid or minimize involuntary resettlement and, where this is not feasible, assist displaced persons in improving or at least restoring their livelihoods and standards of living in real terms relative to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher
4.36 (Environmental)	Forests (2002)	Realize the potential of forests to reduce poverty in a sustainable manner, integrate forests effectively into sustainable economic development, and protect the vital local and global environmental services and values of forests
4.37 (Environmental)	Safety of Dams (2001)	Ensure quality and safety in the design and construction of new dams and the rehabilitation of existing dams, and in carrying out activities that may be affected by an existing dam
7.50 (Legal)	International Waterways (2001)	Ensure that the international aspects of a project on an international waterway are dealt with at the earliest possible opportunity and that riparian are notified of the proposed project and its details
7.60 (Legal)	Disputed Areas (2001)	Ensure that other claimants to the disputed area have no objection to the project, or that the special circumstances of the case warrant the Bank's support of the project notwithstanding any objection or lack of approval by the other claimants

Source: Safeguard policies for World Bank reconstruction projects (GFDRR)

The process of policy conversion continued till 2006, where different set of stakeholders were consulted in parts. The policy conversion was also dependent on the staff involved in the process and turned into long procedures. For instance, the Indigenous Peoples Policy took seven years for conversion. However, the Policy revision process proved to be so cumbersome and time-consuming that there was great reluctance to revise and improve the policies even when this would be beneficial¹⁰.

The projects are screened by prioritizing them based on risks:

- Category A (high risk- likely to have significant adverse environmental impacts that are sensitive, diverse, or unprecedented)
- Category B (modest risk- potential adverse environmental impacts on human populations or environmentally important areas- including wetlands, forests, grasslands, and other natural habitats- are less adverse than those of Category A projects)
- Category C (likely to have minimal or no adverse environmental impacts), or Financial Intermediary (FI) operation (involves investment of Bank funds through a financial intermediary, in sub-projects that may result in adverse environmental impacts)

The various assessments, implementation plans, monitoring and evaluation frameworks, etc. have to be disclosed to the relevant stakeholders depending on the category of the project. For example, for a Category A project all the documents are to be submitted to the Regional Safeguards Coordinator while Category C projects are to be put on Bank's Infoshop and the relevant country websites.

3.4.3. Implementation Gaps of Socio-Environmental Policies of WB¹¹

In a report by Independent Evaluation Group (IEG, 2010) it was presented that the WB does not consider environmental and social performance a significant dimension of a project's development outcome.

¹⁰Safeguards and Sustainability Policies in a Changing World An Independent Evaluation of World Bank Group Experience (http://ieg.worldbankgroup.org/Data/reports/safeguards_eval.pdf#page=82)

¹¹The implementation gaps have been derived from the assessment done for the WBG policies by IEG in 2010. The criticism and suggestions from the IEG, 2010 report have been acknowledged by the Board of Executive Directors of the WBG. These suggestions have been taken into consideration in the new ESF framework revision (as referred to in the statement of Bank's Board of Executive Directors).

Further, internal evaluations have revealed that the social and environmental risks of a project, program, or policy operation are frequently miscategorized. Often, high-risk activity for the WB is not categorized in the same way as is done in its investment financing wings¹².

Having an umbrella policy for Environmental Assessment provided a broad scope for engaging with interested parties (clients, borrowers, etc.) in its socio-environment policies. However, it also led to the focus being narrowed to the policies that are listed than the whole gamut of issues that were a spin off, of the WB funded projects. For instance Involuntary Resettlement Policy and Indigenous Peoples Policy restricted the focus to other issues, like gender impact of WB funded projects.

The IEG report also raised concerns on asymmetry in project monitoring and evaluation frameworks that are subject to country level reporting. The supervision and monitoring frameworks are not constant and clear across projects. The report further indicated that performance indicator based data is not generally collected routinely or used, since these indicators are not well specified. For instance Category A project by far have the most extensive framework for monitoring and evaluation, but the disclosure of information of this category of projects is subject to a many exceptions for information disclosure. Supervision and monitoring receive far less attention, especially in category-B projects, affecting implementation quality and leading to highly uneven results.

3.5. Gender Framework

3.5.1. World Bank

The World Bank Group has an approved operational policy (BP 4.20) on gender and development based on analytical work and consultations conducted by the Bank or by other organizations (for example, governmental, international, or academic institutions).

The policy seeks to focus in the areas which typically include,

The different socioeconomic roles of females and males, including their participation in both market and household economies

- Male-female disparities in access to, control over, and use of assets and productive resources
- Male-female disparities in human development indicators
- The relative participation of females and males in development decision making
- Laws, institutional frameworks, norms, and other societal practices that lead (implicitly or explicitly) to gender discrimination and/or gender inequality

The policy formulates a review of the country context, including the country's policies, priorities, legal and regulatory framework, and institutional arrangements for implementing its gender and development goals.

The results of the gender assessment are incorporated in the country dialogue and reflected in the Country Partnership Framework (CPF). The task teams appraise the following aspects and, as appropriate, ensure that the project design addresses the gender specific issues.

3.5.2. Inter-American Development Bank

The Inter-American Development Bank's Operational Policy on Gender Equality in Development seeks to strengthen the Bank's response to the goals and commitments of its member countries in Latin America and the Caribbean to promote gender equality and the empowerment of women. In order to achieve this objective, the Policy on Gender Equality integrates a gender perspective that seeks equal conditions and opportunities for women and men to reach their social, economic, political, and cultural potential.

¹²ibid 10

3.5.2.1. Four Main Elements in the Policy

Gender Mainstreaming: The Policy seeks to ensure that a gender perspective is applied systematically across development interventions.

Direct Investment: While the IDB has made development loans to governments and private sector clients for many years, the Policy on Gender Equality seeks to specifically support borrowing member countries in identifying financial operations whose primary objectives are to address strategic gender issues, such as maternal health or gender based violence.

Gender Safeguards: This provision introduces gender safeguards to the Bank's Environmental and Social Safeguards in order to prevent or mitigate adverse impacts on women or men or the risk of exclusion due to gender resulting from the IDB's actions through its financial operations.

Monitoring Indicators: The Policy on Gender Equality sets out specific institutional indicators for ensuring effective implementation of the Policy and the evaluation of its results.

The policy calls for proactive attention to gender issues across development sectors and throughout the design, implementation, monitoring and evaluation of IDB-financed operations. Latin America and the Caribbean have made significant advances in gender equality, achieving gender parity in education and increased female labor force participation. It is in this context of both positive advances and persistent challenges that the IDB approves its gender policy, positioning itself to be a stronger partner for the region in this area of work.

3.5.2.2. Gender Action Plan 2011-2013 and Gender Policy Implementation Guidelines

In order to translate the policy into action, the IDB prepared the internal, bank-wide Gender Action Plan for Operations 2011-2013 (GAP) that contains specific actions to effectively jumpstart the implementation and monitoring of the policy.

The IDB also counts with the Implementation Guidelines for the Operational Policy on Gender Equality in Development and several technical notes which seek to facilitate the implementation of the Gender Policy by providing IDB staff with guidance on how to integrate the promotion of gender equality into IDB interventions and corporate results. They offer criteria and basic tools for systematically assessing the potential contribution of Bank interventions towards gender equality, incorporating specific actions to strengthen this contribution, and monitoring results.

3.5.3. Implementation Gaps of Gender policies of MDBs

The major shortcomings of the Gender Policies of MDBs are that there are inadequate monitoring indicators for the Policy, and the existing one could be stronger and limited ways in which one could identify potential adverse gender impacts and include prevention or mitigation measures in financing operations (number and percentage). The policy also seems like it brings an excessive focus on "countries that have identified gender equality as a priority", which can in practice soften the strong language and hamper gender mainstreaming efforts. Specifically, according to an analysis done by the Boll Foundation, WB's Gender Policy does not apply equally to all types of programmes/loans¹³.

3.6. Project Selection, Criteria and Transparency

3.6.1. Project Selection and Criteria

The various stages from country programming to project completion and evaluation are known collectively as ADB's project cycle. ADB provides financing for projects that will effectively contribute to the economic and social development of the country concerned and have the strongest poverty reduction impact in conformity with the country and ADB strategies¹⁴.

¹³World Bank – Gender Policy vs. P4R - https://us.boell.org/sites/default/files/downloads/Alexander_4-6-11_P4R_Critique-FINAL.pdf

¹⁴ADB website



ADB Project Cycle
Source: ADB website

I) Country Partnership Strategy

Country Partnership Strategy (CPS) are developed between the member countries and ADB stating out the medium-term and long-term strategies and operational plans. These CPS are in line with the country's development plan and poverty reduction goals.

A CPS is developed in close consultation with the government and other country stakeholders including civil society, nongovernment organizations, private sector, as well as the country's other development partners. CPS are a public documents and is circulated to ADB's Board of Directors for endorsement, in discussion with the countries. If country does not consent to early disclosure, the CPS will be posted upon its endorsement.

The CPS will be implemented through the country operations business plan which details the three-year rolling pipelines and the resources needed to support them.

II) Preparation

Project Preparation: ADB often provides grants called project/program preparatory technical assistance (PPTA) to help the borrowing country to identify feasible projects.

In the early stages of the PPTA, an analysis called the initial poverty and social analysis, is undertaken to identify the stakeholders being impacted by the project (beneficially or adversely). A technical assistance report is prepared as a recommendation for ADB to finance a technical assistance project.

Due Diligence: A fact-finding mission in consultation with the government and other stakeholders is done. This mission assesses the project's technical, financial, economic, environmental, marketing, and management aspects and potential social impact. Detailed project risks and sensitivity analyses are carried out to assess viability of the proposed project. Loan terms and conditions for loan effectiveness are discussed to improve sector performance and address key policy issues.

III) Approval

Loan Negotiation: The draft loan agreement and draft project proposal is submitted to all parties involved including the Government for review. Feedback is collected, and the Government is then called for negotiation with ADB.

Board Approval: After negotiations with the government, the loan proposal is submitted to ADB's Board of Directors for approval. This report is known as the Report and Recommendation of the President (RRP). It is posted on the web at the same time it is circulated to the Board for approval, subject to country's consent. If country consent is not given, the RRP is posted on the web once consent is achieved.

Loan Signing: After Board approval, the document is sent to the borrowing country's Government for cabinet authorization. Following the authorization from the cabinet, the loan agreement is signed by ADB's President and the Representative of the Government. The loan agreement is posted on ADB's website upon its signing. Representative of the Government. The loan agreement is posted on ADB's website upon its signing.

Loan Effectiveness: The loan takes effect once certain conditions are met. This is also known as loan effectiveness. Generally, the conditions are limited to the legal requirements such as legal opinion, cross-effectiveness of cofinancing, and execution of subsidiary loan agreements. The requirements and deadline for loan effectiveness are mentioned in the loan agreement.

IV) Implementation

ADB-assisted projects are implemented by the executing agency according to the agreed timelines and procedures. A project administration manual sets out the project's implementation agreements and details. The processes like recruiting consultants, preparing essential tender documents, etc., are encouraged to be completed prior to loan negotiation—except signing of contracts—to minimize any start-up delays in project implementation. ADB promotes advance procurement action—recognizing that preparing tender documents, and establishing a project implementing unit with key staff are important part of the project readiness activities.

V) Completion and Evaluation

A project completion report or technical assistance completion report is prepared, after the project is completed. These reports are prepared within 12-24 months of the completion of the project. The evaluation for the project covers the entire results chain of inputs, outputs, outcomes, and impacts.

As per the information mentioned in ADB resources, ADB engages with stakeholders at all stages of its project cycle with essential communications and information-sharing aspects integrated into ADB-supported projects.

3.6.2. Transparency

I) Public Communications Policy (PCP) 2011

ADB promotes information disclosure through its Public Communications Policy (PCP) 2011. The PCP has been designed to keep stakeholders updated of ADB activities. The policy promotes greater transparency and accountability by enabling ADB's stakeholders to better participate in decision-making that affects them.

The current version of the policy reflects the views of its staff on their experiences with the policy and suggestions made by NGOs during consultations. The ADB also recognizes the need to communicate more widely and effectively by translating its documents into the languages used in its developing member countries¹⁵.

II) Accountability Mechanisms

In 2003, after an extensive review, the ADB introduced the Accountability Mechanism Policy to enhance its development effectiveness and project quality, be responsive to the concerns of project-affected people and fair to all stakeholders, to reflect the highest professional and technical standards in its staffing and operations, be as independent and transparent as possible, and be cost-effective efficient and complementary to the other supervision, audit control, quality control, and evaluation systems at the ADB. This policy was further revised in 2012. ADB's Accountability Mechanism Policy 2012 requires the Office of the Compliance Review Panel, Office of the Special Project Facilitator, Independent Evaluation Department, and Sustainable Development and Climate Change Department to produce a learning report every 3 years.

The Accountability Mechanisms of ADB are intrinsically connected with grievance redressal and compliance review.

¹⁵Articulating a vision for a progressive BRICS development bank (an ICRIER-Oxfam report, 2014), (http://icrier.org/pdf/report_brics_bank.pdf)

3.6.3. Implementation Gaps for Project Selection, Criteria and Transparency of ADB

In theory, the Accountability Mechanism is the ADB's mechanism to hold the Bank accountable to its policies. However, the mechanism's process is very lengthy, and currently only affected persons can file a complaint. In most cases, affected communities are more interested in redress than proving policy compliance. Therefore, the mechanism has only limited usefulness for external stakeholders monitoring policy compliance.

ADB project selection criteria require technical assistance to be provided by the ADB staff to the country level stakeholders. In addition, since ADB staff does not have the necessary expertise, it is outsourced to consultants in developed countries. Technical Assistance should not merely include consultancy services and technical support for the execution of projects, but should also consist of activities that augment the level of knowledge, technical skills, and productive capacities of people in developing countries.

Recommendations

The previously mentioned analysis indicates that there are indeed a number of policy areas, where the NDB could perhaps learn from the practices and experiences of a few Development Finance Institutions, while it puts in place policies and procedures for its effective functioning in the times to come. Having said that, this is not to suggest that the policy standards that have been set by existing International Financial Institutions are adequate or are implemented faultlessly. This is only to try and provide examples of standards that are sought to be followed by several existing and well established institutions that could be emulated to start with, and could even be exceeded with the NDB setting its own benchmarks for others to follow in times to come.

Some of the key recommendations based on the analysis of the policies of the Development Finance Institutions that were looked at for preparing this paper are given below:

4.1. Transformational Investments and Social Infrastructure Policies

4.1.1. Focus on Integrating Financial Services with Transformation (Development Effectiveness)

The WBG has two core goals, i.e., to reduce poverty and to promote shared prosperity. For achieving these two goals, WBG invests in projects that promote gender equality and inclusion; supporting environmental sustainability; bolstering crisis response capability; and confronting the problems of fragility everywhere. Policies like the Development Policy Financing (DPF) and Program-for-Results Financing (PFRF), are aimed at financing projects that enhance social infrastructure and bring about transformative change.

The NDB could try to learn from the WBG policies and focus on integrating a development approach in financing its programmes rather than just a project based approach. This would help the borrowing country or region, benefit from the knowledge resources too, rather than just the financial services of the NDB. Like the WBG, NDB can begin by integrating both the knowledge and financial services that would help in designing evidence-based solutions throughout the development cycle. This would aid in making NDB's investments, as transformative investments.

4.1.2 Ensuring Proper Safeguards

The monitoring and evaluation practices for policies like DPF and PFRF is weaker than the investment policies of WB. The monitoring framework rely heavily on self reporting by the client, leaving asymmetries in data (BIC, 2013). This ambiguity poses a challenge for the civil societies to monitor the projects. Therefore, the NDB could learn by designing and implementing clear monitoring and assessment tools to ensure the development nature of bank lendings. Additionally, these tools could at least have a certain minimum monitoring standards to align with the both the borrowing country's and NDB's goals.

4.1.3. Focus on Aligning the Policies with Global Practices

NDB has the advantage of being formed in the current dynamic times, when the focus is on issues such as sustainability and addressing climate change. The other IFIs have to strive to align their goals and policies to global issues like Sustainable Development Goals (SDGs), as well as effective implementation of the Paris Agreement, etc. Therefore, the NDB would benefit from aligning its policies from the onset to ensure the effectiveness of its development aid. Thus, there is ample opportunity for the NDB to showcase itself as a "Leader of Development Finance Institutions" in facilitating and helping to fund developing countries to embark on a pathway that ensures compliance of the SDGs as well as the Paris Agreement on Climate Change, which endeavours to bring down the greenhouse gas emissions globally to "net zero levels" by the second half of this century.

4.1.4. The NDB could create a niche for itself, in supporting the “Sustainable Energy 4 All Initiative” of the UN Secretary General in ensuring “energy access to all by 2030”. This would be in tune with its overall goals of promoting sustainable development, while ensuring overall growth and development in all countries and of course the goal and objective of reducing poverty in developing countries. In our view, the NDB needs to fill the existing gap to support, in particular, decentralized options and models, smart grids and hybrid options that can serve as demonstration projects to prove the viability of renewable energy systems, especially for the poor and the marginalised sections of the society.

These options should also include appropriate and locally available sources of energy such as biogas, mini- and micro-hydel projects, etc. It also must be recognized that there are opportunities for having large programmes for providing basic electricity needs to the poorest of the poor by means of renewable energy systems, which will also generate employment opportunities. And these could be provided within a very short period of time and thus improve the living conditions of the poor without waiting for centralized power generation systems. Further, this will also lead to countries pursuing their development goals on an alternative and more sustainable pathway that would also mitigate the risk of sinking money into assets that could be in danger of getting stranded without realizing their full productive value.

4.2. Approach to Civil Society Consultation

4.2.1. Developing Robust Civil Society Engagement Framework

ADB policies for civil society engagement encompasses CSO consultations even when designing policies and country strategies. NDB could perhaps develop a framework similar to ADB and involve the CSOs in policy discourse. NDB could learn from the ADB and develop open procedures and decision making processes for direct participation of individuals, communities and civil society organizations potentially affected by NDB-financed activities. Additionally, it would be useful for NDB to have an inclusive network of CSOs, unlike ADB. ADB has its select group of CSOs, which are specifically picked by the borrowing countries. This inclusive network could be suggested by NDB or include the minimum selection criteria for having the type of CSOs in the NDB network.

CSOs should be engaged constructively so as to ensure that they do not become a closed group of some CSOs engaging with the NDB in most cases. Careful involvement of diverse and heterogeneous group of CSOs would be imperative, to ensure inclusive involvement of the CSO movement and its representation as a whole.

4.2.2. Enabling South – South CSO Engagement

It would also be useful for the NDB to consider developing an enabling space for the south – south CSO engagement. Currently the southern CSOs require an international fora and/or engagements to interact with each other. Additionally the capacity of these CSOs could be build with the help of the NDB thereby enabling them to engage more constructively with each other and the NDB. In terms of this knowledge exchange, indigenous knowledge of the BRICS countries and/or the project countries ought to be incorporated to ensure proper delivery of the projects/programmes.

4.3. Internal Ombudsman and Grievance Redressal Policies

4.3.1. Establishing a Thorough Independent Review System

AfDB has well defined grievance redressal mechanism both for internal and external issues (on the policy level). The NDB could consider having a similar mechanism in place, keeping in mind the implementation gaps of the AfDB. This would not only help in adopting corrective measures for projects that might negatively affect certain communities, but would also help in streamlining the processes like the project selection criteria, monitoring and evaluation framework, etc.

Also, it had been observed that AfDB's grievance redressal policy has been limited to fact finding mostly, rather than fully implementing the recommendations. NDB could ensure that all grievances are addressed as per the defined procedures and proper monitoring of the process is undertaken within the system. This could be achieved by building capacity of NDB's staff vis-à-vis the handling of grievance redressal.

4.3.2. Involvement of All Relevant Stakeholders

AfDB has its group of experts that help in advising towards conflict resolution. NDB could also consider including such group of experts since they are independent, without any vested interests. In addition to this, in policy, AfDB's process also involves engaging with all levels of stakeholders that might be important. This could include engaging constructively with the companies, partners that are being assessed. For instance, in AfDB the IRM office cannot mandate the company, against whom the redressal mechanism has been initiated, to participate in the review process. Free, prior and informed consent (FPIC) is a practice that is part of the consultation process in some of the IFIs including the WB. The NDB could consider including this as part of their consultation process with the communities. This could be an additional level of consultation that could be considered by the NDB.

In addition, NDB could strive to define and build capacity of the staff members to increase the level of stakeholder participation during the process, elaborate on the requirements for meaningful consultation, drawing on IFIs policies and practices, including that these draft documents and other information are provided in local languages and in a format understandable by the affected communities, and that processes and timelines for consultation are transparent and mutually agreed with affected communities, transcripts of consultation proceedings and comments received are disclosed, etc.

4.4. Socio-Environmental and Accountability Framework

4.4.1. Need for Socio – Economic Safeguards

The World Bank also has a whole set of policies that include environmental and social safeguards while designing and implementing projects that the NDB could do well to emulate for itself. While NDB too has a draft Environmental and Social Framework that is meant for specific projects, NDB could consider having monitoring, prevention and mitigation tools for NDB financed projects, as are there in the investment finance vertical of WB. The WB lacks clearly defined monitoring indicators for issues like gender. Further, the NDB has also maintained flexibility to waive off certain policies for projects based on the country systems. However, the NDB would also need to ensure that this flexibility does not lead to adverse negative, or reduced positive, impacts of the NDB funded projects. Additionally, having country specific monitoring indicators would allow gathering of pointed data that would help in ensuring evidence based corrective measures, including looking at all socio-environmental indicators, would serve the NDB well. In order to carry forward the 'Green Bank' mandate of the NDB, it would be helpful for the Bank to consider having periodic assessments of its projects and/or investments vis-à-vis progress in furthering the achievement of global priorities like the SDGs, Paris Agreement, etc.

4.4.2. Participatory Approach towards Assessing Socio-Environmental Policies

It is essential that these environmental and social assessments require a participatory approach so that the affected communities are able to provide inputs in the process, and play an active role in identifying potential impacts and its significance. Additionally, NDB should identify the staffing and resources necessary for social and environmentally sustainable operations, including dedicated environmental and social specialists and environmental and social compliance officers. This could translate into developing country level approaches for NDB financed projects to strengthen their national environmental and social systems. Since NDB is adopting this a country driver approach, it could also take into consideration the need to develop a policy/an approach to strengthen national socio- environmental systems (for instance through technical cooperation).

4.4.3. Full Disclosure of Project Documents

WB has a well-defined Access to Information Policy where the project documents are disclosed to the public based on project categorisation. NDB could benefit from having clear guideline for the countries to have most of the project related documents (including those related to socio-environmental risk and impact assessments conducted throughout the project cycle) and data available to the stakeholders, especially the affected communities. NDB could also consider, having these documents translated in local languages to ensure their availability to the communities.

4.5. Gender Framework

4.5.1. Minimum Standards for Implementation of Common Guidelines

Both the WB and IDB have policies that are working towards gender mainstreaming. However, it can be observed that their institutional policies undergo a change based on the borrowing countries and their country specific gender policies. By having minimum standards that the borrowing country could adhere to, NDB could provide a uniform approach (to some extent) towards implementation and monitoring. This would also help in developing monitoring indicators vis-à-vis gender, which are not as clearly defined in IDB or WB. A good way forward could be to have a gender policy or rather a gender equality policy that could guide the gender mainstreaming aspects in NDB financed projects.

4.6. Project Selection Criteria

4.6.1. Managing Country Level Subjectivity

ADB has a formal process for project selection and has a stepwise project cycle in place. Generally, the projects are based on the country strategies and programmatic focus and the project selection criteria undergoes change based on the local policies. This might lead to varying safeguards in terms of issues like environment impact assessments, disclosure of information etc. It would therefore be useful for the NDB to define those aspects of project selection (certain minimum standards), that would be static and might remain non-negotiable. These aspects could be based on global good practices to ensure some uniformity in programme implementation.

For instance, the NDB could consider being strict on the aspect of keeping away from financing or investing in fossil fuel like some other IFIs are already doing.

During the compliance review of the grievance redressal, sometimes the compliance suggestions are not taken forward and hence the process limits itself to fact finding. Some incentive mechanism to enable the compliance officer to push for the corrective measures could be considered by the NDB. This could be done in the form of a grievance redressal fund, etc. This might help in practically implementing the corrective measures. Additionally, NDB's mandate/DNA is to fund "sustainable infrastructure" and it considers itself as green. Therefore, this is an additional opportunity to develop coherent guidelines for project selection that will enable the NDB to fulfill its mission.

4.6.2. Conformity to Sustainable Development Goals and Paris Agreement

In continuation to what has been said in point 4.1.3, it still needs to be stressed that one of the project selection criteria for infrastructure projects, particularly energy infrastructure projects is its conformity to meeting the goals envisaged in both the Sustainable Development Goals as well as the Paris Agreement of ensuring a "Net Zero Emissions" by the second half of the century. This would ensure that the Bank would be in a position to achieve its mandate of supporting "sustainable infrastructure".

Conclusion

To conclude, it is very obvious from the above analysis that the NDB needs to put in place policies and policy frameworks for a number of issue areas, and also strengthen some of the existing policies such as the “Environment and Social Safeguards Framework and the Interim Information Disclosure Policy”. The biggest learning for the NDB could be to learn from the implementation gaps and challenges that other IFIs face and strive to exceed them in the implementation standards that it sets for itself.

Further, the research also brings out the fact that the NDB has a huge opportunity to showcase itself as a leader on issues such as “Transformational Investments and Social Infrastructure”.

We do hope that in coming days, some of the key recommendations, get translated into concrete policy framework for the NDB.

References

- World Bank Operational/Bank Policies for Investment Policy Financing– OP 10.00/BP 10.00
- World Bank Operational/Bank policies for Development Policy Financing- OP 8.60/BP 8.60
- World Bank Country Engagement Strategies – Catalogue number - OPCS 5.01-DIR.01
- World Bank Environment and Social Safeguard Policies (OP/BP 4.00, 4.01, 4.02, 4.04, 4.10,4.11, 4.36,4.37)
- World Bank Policy for Program-for-results financing- OPCS5.04-POL.01
- Poverty and Social Impact Analysis of Reforms: Lessons and Examples from Implementation: Series of case studies illustrating PSIA in agriculture, energy, utilities, social sectors, taxation, and macro-economic modeling. <http://go.worldbank.org/OHA9QNIDK0>
- Hall, A. "Social Policies in the World Bank: Paradigms and Challenges." *Global Social Policy* 7.2 (2007): 151-75. Web.
- "Social Development and Infrastructure: Working in Partnership for Sustainable Development." *Social Development and Infrastructure: Working in Partnership for Sustainable Development (English) | The World Bank*. N.p., 01 July 2010. Web. last accessed: 02 Mar.2017
- Asian Development Bank Publication, "Civil Society Organization: Source Book, A staff guide to cooperation with Civil Society Organizations | Asian Development Bank, 2008, Philippines.
- Asian Development Bank Publication, "ADB -Government- NGO Cooperation, A Framework for Action, 2003-2005", May 2003
- Asian Development Bank Publication, "Public Communications Policy 2011: Disclosure and Exchange of Information", 2011, Philippines
- On AfDB Ombudsman Unit from <https://www.afdb.org/en/about-us/organisational-structure/chief-operating-officer/ombudsman-unit/> Web. last accessed: 02 Mar.2017
- BNDES Socioenvironmental Policy, http://www.bndes.gov.br/SiteBNDES/bndes/bndes_en/Institucional/Social_and_Environmental_Responsibility/socioenvironmental_policy/ Web. last accessed: 02 Mar.2017
- World Bank Policies on Gender and Development http://siteresources.worldbank.org/INTGENDER/Resources/GAD_PolicyFramework.pdf. Web. last accessed: 02 Mar.2017
- Inter-American Development Bank policies on Gender Equality in Development -<http://www.iadb.org/en/topics/gender-indigenous-peoples-and-african-descendants/operational-policy-on-gender-equality-in-development,2980.html>. Web. last accessed: 02 Mar.2017
- Inter-American Development Bank policies on Gender Mainstreaming Tool -<http://www.iadb.org/en/topics/gender-indigenous-peoples-and-african-descendants/gender-mainstreaming-tools,9558.html>. Web. last accessed: 02 Mar.2017
- Inter-American Development Bank policies on Gender Equality -<http://www.iadb.org/en/topics/gender-indigenous-peoples-and-african-descendants/gender-equality/gender,1926.html>. Web. last accessed: 02 Mar.2017
- "The Independent Review Mechanism of the African Development Bank." Stichting Onderzoek Multinationale Ondernemingen (SOMO)/Accountability Counsel, Feb. 2017. Web. 2 Mar. 2017. <https://www.somo.nl/independent-review-mechanism-african-development-bank-2/>.
- CAF. 2012. Programa de Gestión Ambiental y Social para Instituciones Financieras. CAF- banco de desarrollo de América Latina. Caracas, Venezuela: 27 pp. See: <http://lacer.lacea.org/handle/123456789/60202>;
<http://scioteca.caf.com/bitstream/handle/123456789/907/caf%20programa%20de%20gestion%20ambiental%20y%20social%20para%20instituciones%20financieras.pdf?sequence=1&isAllowed=y>
- ENVIRONMENTAL AND SOCIAL SAFEGUARDS FOR CAF/GEF PROJECTS MANUAL – Version 1 (May 2015) https://www.caf.com/media/2759391/d0-7_s_e_safeguards_manual_to_caf-gef_projects_may_2015_28.pdf.
- <http://webiva-downton.s3.amazonaws.com/877/0c/0/7222/2/emerging-sustainability-frameworks-BNDES.pdf>
- https://www.elaw.org/system/files/bndes.trans_eng_.pdf
- BNDES Ombudsman Office: <https://goo.gl/nZJdjw>
- http://icrier.org/pdf/report_brics_bank.pdf
- <https://www.caf.com/en/currently/news/2005/05/venezuela-governance-and-leadership-in-action/?parent=30681>
- <https://www.caf.com/en/currently/news/2016/02/the-active-role-of-citizens-and-their-impact-on-the-state/?parent=30681>http://siteresources.worldbank.org/INTGENDER/Resources/GAD_PolicyFramework.pdf
- Investing in gender equality for africa's transformation: https://www.afdb.org/fileadmin/uploads/afdb/Documents/Policy-Documents/2014-2018_-_Bank_Group_Gender_Strategy.pdf
- Gender Equality and Women's Empowerment Operational Plan, 2013–2020: <https://www.adb.org/sites/default/files/institutional-document/33881/files/gender-operational-plan.pdf>
- Operational policy on gender equality in development: <http://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=35428399>
- Review and update of the world bank's safeguard policies (https://consultations.worldbank.org/Data/hub/files/consultation-template/review-and-update-world-bank-safeguard-policies/en/materials/board_paper_for_es_framework_third_draft_for_disclosure_august_4_2016.pdf)
- Netherlands Commission of Environment Assessment, 2015 (http://api.commissiener.nl/docs/os/i71/i7144/su01-59_analysis_proposed_changes_to_wb_safeguard_policies.pdf)
- Environmental and Social Assessment, Bank Information Centre (<http://www.bankinformationcenter.org/our-work/safeguards/environmental-and-social-assessment/>)

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