

## **Comments on the World Bank's Draft Policy Paper on Program-for-Results Financing**

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Comment 1:

**The World Bank should redraft the Policy Paper on Program-for-Results, and should provide an additional public consultation period.**

Rationale:

As described in the following comments, the draft OP 9.00 does not fully address fundamental concerns of stakeholders.

Comment 2:

**Criteria of environment and social systems assessment should cover key requirements of existing safeguard policies.**

Rationale:

Para. 8 of the draft OP 9.00 does not fully cover the key requirements of existing safeguard policies, while OP 9.00 proposes to eliminate existing safeguard policies in Program-for-Results operations.

Comment 3:

**Exclusion of “activities that could cause significant and irreversible adverse impacts” (recognized as Category A projects) should be clearly mentioned in the OP 9.00. Detailed procedures to eliminate such high risk projects should be also included in the OP 9.00.**

Rationale:

Para. 47 of the draft Policy Paper states “Program-for-Results will not support activities that could cause significant and irreversible adverse impacts on the environment or affected people.” However, there is no such requirement in the draft OP 9.00. Moreover, it is unclear how the World Bank eliminates such high risk activities in the Program-for-Results operations.

Comment 4:

**Applicability, scope and procedures of compliance review by the Inspection Panel should be clearly stated in the OP 9.00.**

Rationale:

It is unclear how the Inspection Panel investigates the Bank's compliance in Program-for-Results operations.