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CARIBBEAN DEVELOPMENT BANK



EVALUATION REPORT

**EVALUATION OF THE CARIBBEAN DEVELOPMENT BANK'S
ENVIRONMENTAL AND SOCIAL REVIEW PROCEDURES
WITH MANAGEMENT RESPONSE (ANNEX 1)**

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OFFICE OF INDEPENDENT EVALUATION

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Evaluation of the Caribbean Development Bank's Environmental and Social Review Procedures

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Office of Independent Evaluation
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The Evaluation of the Caribbean Development Bank's (CDB) Environmental and Social Review Procedures (ESRP) has been conducted by the Office of Independent Evaluation (OIE) at CDB with the support of the external consultancy firm, IOD Parc. The primary objective of this evaluation is to provide credible and reliable information on the CDB's ESRP performance during the 2014–22 period, enabling the drawing of lessons and recommendations to inform a revised iteration of the procedures.

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Field visits were conducted in four countries (Belize, Guyana, St Lucia, St Vincent and the Grenadines), providing an opportunity to examine how risks are managed and mitigated in practice. I extend my gratitude to the four Borrowing Member Countries that facilitated the field missions and supported the data collection process, as well as to all the individuals and organizations that participated in interviews and facilitated data collection.

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Executive Summary

Background

The current version of the Caribbean Development Bank's (CDB) Environmental and Social Review Procedures (ESRP) document was approved in 2014 and built on earlier experience in the application of the Bank's Environmental Review Guidelines (1994) and the Guidelines for the Social Analysis of Projects (2004). The ESRP outlines how CDB, within its mandate and operations, ensures that environmental and social risks are managed. The ESRP include eight environmental and social performance requirements (PRs) to:

1. Optimise decision-making with respect to environmental and social impacts, and risks to anticipate, avoid, mitigate, and/or compensate for adverse project impacts on the environment and affected people and communities.
2. Assist Borrowing Member Countries (BMCs) to build capacity and strengthen their institutions and governance systems to manage environmental and social risks effectively.
3. Provide staff, BMCs, and other development partners with a clear understanding of CDB's requirements, and procedures, accountabilities for managing environmental and social risks in its operations.

The Environmental Sustainability Unit (ESU) is responsible for updating and revising the ESRP, developing other policies/procedures, familiarising and training staff, and providing general guidance. The ESU and the Social Sector Division (SSD) are also involved in project work, coordinating project appraisal and supervision, and providing technical inputs.

Scope and Methodology

The main aim of the evaluation is to provide credible and reliable information on the CDB's ESRP performance during the 2014–22 period to enable lessons and recommendations to be drawn that may be used to inform a revised iteration of the procedures. The evaluation serves both accountability and learning purposes in determining how effectively the ESRP serve the intended purpose and identifying how the procedures can be updated and strengthened (if required). The evaluation sought to answer four overarching evaluation questions:

1. How well are CDB's ESRP suited to preventing, managing, and mitigating adverse environmental and social impacts?
2. How effectively have CDB's ESRP been applied?
3. What have been the results of CDB's ESRP?
4. How effectively have the ESU/SSD supported CDB's ESRP?

The evaluation used a mixed methods approach, drawing and triangulating findings from a review of 104 documents, 51 key informant interviews with 92 CDB staff and partners, and four country visits (Belize, Guyana, Saint Lucia, and Saint Vincent and the Grenadines). The approach included sampling 23 CDB projects approved after January 2014, including all Category A projects and 19 Category B projects in the sampled countries.

The evaluation team coded the data against a structured coding framework, which fed into internal analysis sessions and several validation workshops with the ESU/SSD. The evaluation team also constructed and validated a Theory of Change (ToC) with the ESU/SSD and carried out a comparative analysis of environmental and social procedures of five comparable International Financial Institutions (IFIs), including the World Bank, the Inter-American Development Bank (IDB), the Asian Development Bank (ADB), the African Development Bank (AfDB), and the International Fund for Agricultural Development (IFAD).

The evaluation faced limitations in assessing project benefits and risk mitigation results due to ongoing projects and limited data availability. Key informant interviews were relied upon as the primary source of evidence in many cases due to the unavailability of some documentation.

Conclusions

Looking across the whole evaluation, we can draw five main conclusions (the corresponding codes to evaluation questions are shown in brackets for reference):

1. Over the last ten years, there has been a clear evolution in the prominence and centrality of environmental and social review procedures in CDB's work. The importance of the ESRP has been brought into much sharper focus, and staff demonstrate increasing awareness of the procedures and why they matter. Even non-specialists are able to speak knowledgeably about the need for attention on environmental and social issues and how they should be considered. (EQ A)

This trend reflects greater awareness and importance of the environmental and social issues within the context of the national development objectives of each BMC and the international commitments to the Sustainable Development Goals (SDGs). BMCs also recognise that these issues and the standards are important; they may see the procedures as time-consuming and demanding but understand why they matter and have taken ownership of their application. Drivers for this process include the internal push by the ESU/SSD, the pressures and scrutiny from donors to the CDB, and from pressure groups within the BMCs that have pushed for greater attention to environmental and social issues. Another facet of this evolution has been a shift in thinking towards an increasingly holistic approach that goes beyond identifying and managing risks to considering the realisation of benefits, although this is a work in progress. (EQ A, B, and D)

2. Although the application of the ESRP in practice has evolved considerably, ESRP is expected to be reviewed and updated on an ongoing basis. Having considered practice in other multilateral development banks (MDBs), this evaluation provides an opportunity for CDB to consider some recommendations for updated tools and guidelines, for example, in areas such as sexual exploitation

and abuse (SEA) and climate change, where more detailed and specific guidance is required. Currently, BMCs tend to rely more heavily on the guidance of other MDBs, such as the World Bank and the IDB. Further guidance should be presented in a clear visual form for the more general categorisation, with accompanying, more detailed guidelines and easy-to-complete (possibly digitally) templates on specific scenarios. (EQ A and EQ B)

3. Compared to other MDBs, CDB holds a notable advantage as a smaller, more adaptable institution with deep regional expertise. The evaluation also noted that the application of the ESRP has significant costs for BMCs. Taken together, these points suggest that CDB could usefully offer a more tailored and flexible approach to applying the ESRP based on knowledge of the country context. In some instances, particularly in countries with stronger capacities like Belize and Jamaica, there may be opportunities to consider using country systems, following a thorough diagnostic assessment of their readiness. The feasibility of employing country systems should be assessed gradually, especially beginning with low risk projects and the circumstances of each situation (EQ A and EQ B)
4. The application of the ESRP during the project identification and appraisal stage was found to be comparatively stronger than in the project implementation, supervision, enforcement and monitoring of results. There are weaknesses in the capacity of CDB and its BMCs to monitor compliance with Environmental and Social Monitoring Plans (ESMP), and there is a need for stronger incentives for contractors to follow through on the requirements. (EQ B and EQ D)
5. The evaluation has considered what results are supported by the ESRP, given the intent of the ESRP to go beyond risk management and mitigation (“do no harm”) to help underpin positive benefits and impact (“do good”). This area turned out to be the least well evidenced. The projects in the sample had been initiated since 2014, but given the long lead times of CDB projects, few have been completed long enough for projection completion reports to be available. The evaluation concludes that the ESRP has strengthened the processes that underpin results, i.e., there have been tangible steps to manage and mitigate risks and to set out plans for delivering positive environmental and social results. This is an important condition for results to be realised, backed up by examples from the field visits of results starting to emerge. (EQ C and EQ D)

Recommendations

The evaluation makes five recommendations:

R1. When updating the ESRP, CDB should examine practices from other MDBs that may offer insights. Specifically, CDB should explore:

- The feasibility of implementing a separate climate change classification and whether it may be embedded within the screening processes.

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- Addressing adverse impacts on critical habitats and clarifying the acceptability of mitigation strategies, such as offsets on critical habitats.
- Considering consultation, information dissemination, and disclosure vis-à-vis stakeholders as performance requirements, drawing insights from the Basic Needs Trust Fund (BNTF) as a good internal practice.
- Providing more specific guidance for identifying risks and potential adverse impacts on differentiated and intersectional vulnerable populations, including Indigenous Peoples, in future iterations of the ESRP.

R2. Ensure adequate attention and positioning of risks related to SEA within CDB's protocols. This involves defining SEA, setting CDB's expectations of BMCs, providing guidance on risk assessment, and incorporating appropriate clauses (e.g., Sexual Misconduct clause) within loan agreement terms and conditions.

R3. Clarify the role of gender impact assessment tools (e.g., CDB's Gender Marker Analysis) within the ESRP process to strengthen the link between gender mainstreaming activities and the ESRP.

R4. Clarify CDB's approach to utilising the environmental and social frameworks of BMCs as follows:

- Define acceptable and expected practices of BMCs regarding framework utilisation.
- Communicate the cost implications of disregarding E&S risks.
- Consider adopting a progressive approach, prioritising the enhancement of BMCs' safeguards systems over project-by-project assessments. This can be implemented gradually, beginning with an assessment of BMCs' capacity and focusing on initially low risk projects.
- Explore accreditation for national institutions capable of overseeing environmental approvals.

R5. Develop a user-friendly communication package for the ESRP to address capacity-building needs and enhance understanding among stakeholders. Components may include briefs, flow diagrams, training materials and videos, and a centralised document management system (e.g., in a central SharePoint system to allow ease of access).

Acronyms

AADT	Annual Average Daily Traffic
AfDB	African Development Bank
ADB	Asian Development Bank
BMC	Borrowing Member Country
BNTF	Basic Needs Trust Fund
BZE	Belize
CCVA	Climate Change Vulnerability Assessment
CDB	Caribbean Development Bank
CDRRF	Community Disaster Risk Reduction Fund
CEO	Chief Executive Officer
CES	Country Engagement Strategy
CII	Conference of International Investigators
CLO	Community Liaison Officer
CSO	Civil Society Organisation
CSP	Country Strategy and Programme
CSS	Country Safeguards Systems
CTCS	Caribbean Technological Consultancy Services
DAIDB	Dominica Agricultural Industrial and Development Bank
DFI	Development Finance Institution
DFID	Department for International Development
DRM	Disaster Risk Management
DoE	Department of Environment
E&S	Environmental and Social
EIA	Environmental Impact Assessment
EIB	European Investment Bank
EMC	Environmental Monitoring Consultant
EMP	Environmental Monitoring Plan
ENMO	Ethics Network of Multilateral Organisations
EPA	Economic Partnership Agreement
EQ	Evaluation Question
ERP	Emergency Response Plan
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Monitoring Plan
ESPS	Energy Sector Policy and Strategy
ESRP	Environment and Social Review Procedures
ESS	Environmental and Social Standard
ESSM	Environmental and Social Screening Memorandum
ESU	Environmental Sustainability Unit
FIs	Financial Intermediaries
GBV	Gender-based Violence
GCF	Green Climate Fund

GE	Gender Equality
GEPOS	Gender Equality Policy and Operational Strategy
GESI	Gender Equality and Social Inclusion
GRM	Grievance Redress Mechanism
HIV	Human Immunodeficiency Virus
ICA	Integrity, Compliance and Accountability
IDB	Inter-American Development Bank
IFAD	International Fund for Agricultural Development
IFC	International Finance Corporation
IFI	International Financial Institution
IPDP	Indigenous Peoples Development Plan
JCD	John Compton Dam
KII	Key Informant Interview
LGBTQI+	Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex
LOC	Line of Credit
MDB	Multilateral Development Bank
MICI	Independent Consultation and Investigation Mechanism
NGO	Non-Governmental Organisations
OECS	Organisation of Eastern Caribbean States
OED	Operations Evaluation Department
OIE	Office of Independent Evaluation
PAPs	Project-affected people
PBL	Policy-based Loan
PC	Project Coordinator
PCR	Project Completion Report
PIB	Project Information Booklet
PMU	Project Management Unit
PR	Performance Requirement
QCBS	Quality-and Cost-Based Selection
RAC	Resilience Action Committee
RAP	Resettlement Action Plan
RFP	Request for Proposals
RRL	Rehabilitation and Reconstruction Loan
SDF	Special Development Fund
SDGs	Sustainable Development Goals
SEA	Sexual Exploitation and Abuse
SECAP	Social, Environmental and Climate Assessment Procedure
SEO	Socio-Environment Officer
SEP	Stakeholder Engagement Plans
SESA	Strategic Environmental and Social Assessment
SIDS	Small Island Developing States
SSD	Social Sector Division
SSU	Special Studies Unit
SVG	St. Vincent and the Grenadines
TA	Technical Assistance

ToC	Theory of Change
UKCIF	The United Kingdom Caribbean Infrastructure Partnership Fund
YPOS	Youth Policy and Operational Strategy

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1 Introduction

1.1 Background

The current version of the Caribbean Development Bank's (CDB) Environmental and Social Review Procedures (ESRP) was approved in 2014 and built on earlier experience in the application of CDB's Environmental Review Guidelines (1994) and the Guidelines for the Social Analysis of Projects (2004). The current version was the first time CDB had integrated environmental and social issues as part of an encompassing ESRP document.

The 2014 ESRP document reflects shifts in thinking and approaches by the development community in addressing issues of environmental and social sustainability and poverty reduction. These include the need for enhanced dialogue, participation and consultations with all stakeholders, systematic assessment of impacts and risks, more focus on analysing the social dimensions of development initiatives, and greater effort to harmonise policies and procedural requirements with the wider development community to improve development effectiveness. Additionally, the ESRP aim to support Borrowing Member Countries (BMCs) in addressing issues they have identified as priority concerns central to their efforts to reduce poverty and achieve their sustainable development objectives.

The 2014 ESRP document outlines how CDB, within its mandate and operations, ensures that environmental and social risks are managed. The document includes eight environment and social performance requirements (PRs) that reflect the principles, core policies, standards, and best practice approaches adopted and used by the multilateral financial and development community in treating sensitive environmental and social issues. The objectives of the PR are to:

1. Optimise decision-making with respect to environmental and social impacts and risks to anticipate, avoid, mitigate, and/or compensate for adverse project impacts on the environment and affected people and communities;
2. Assist BMCs to build capacity and strengthen their institutions and governance systems to effectively manage environmental and social risks;
3. Provide staff, BMCs and other development partners with a clear understanding of CDB's requirements, and procedures, accountabilities for managing environment and social risks in its operations.

The Environmental Sustainability Unit (ESU) of the Projects Department has the general responsibility to revise and update the ESRP, develop other environment and social operational policies/procedures, provide guidance in the familiarising and training of staff in their use, as well as providing general guidance on these issues. The ESU and social analysts from the Social Sector Division (SSD) are directly involved in project work as members of project teams. They are also responsible for coordinating project appraisal and supervision and for providing technical inputs in the appraisal and supervision of investment projects, and support to the wider operations area of the Bank.

The ESRP document has two components: (i) mainstreaming environmental and social considerations and (ii) the environmental and social review requirements specific to the Bank's investment lending operations. Central to these two components are the environmental and social PRs that guide the Bank's approach to managing and treating social and environmental issues in its operations.

CDB's environmentally focused PRs are very similar in scope to those of other MDBs, covering: (i) pollution prevention, control and management, (ii) toxic and hazardous substances control and management, and (iii) critical natural habitats, biodiversity and ecosystem services. These PRs are aligned with—and informed by—continuously evolving international agreements such as the Basel, Rotterdam and Stockholm Conventions and the Convention on Biological Diversity.¹ While climate change is not an explicit PR, the broader ESRP process does allow for (and in some instances requires) undertaking of climate change vulnerability and risk assessments at both country strategy and project levels.

CDB's socially focused PRs are also very similar in scope to other MDBs, covering (i) Physical Cultural Property; (ii) Directly Affected Communities; (iii) Vulnerable Groups; (iv) Land Acquisition and Resettlement; and (v) Community, Worker Health and Safety (note that this is cross-cutting). In the case of Land Acquisition and Resettlement, Indigenous Peoples are expressly mentioned (although there is no definition of who these populations are and how they may be considered country-by-country).

1.2 Evaluation Methodology

1.2.1 Evaluation Purpose

The evaluation is focused on utilisation, with the key aim of informing the iteration/update of the ESRP. The main aim of the evaluation is to provide credible and reliable information on CDB's ESRP performance during the 2014–22 period to enable lessons and recommendations to be drawn that may be used to inform a revised iteration of the procedures and more generally to improve the development effectiveness of the Bank's strategies and. Given that the procedures were revised and integrated for the first time in 2014, the scope of the evaluation focused on interventions that were approved after January 2014.

¹ <https://www.basel.int/>, <https://www.pic.int/>, <https://www.pops.int/>, <https://www.cbd.int/>

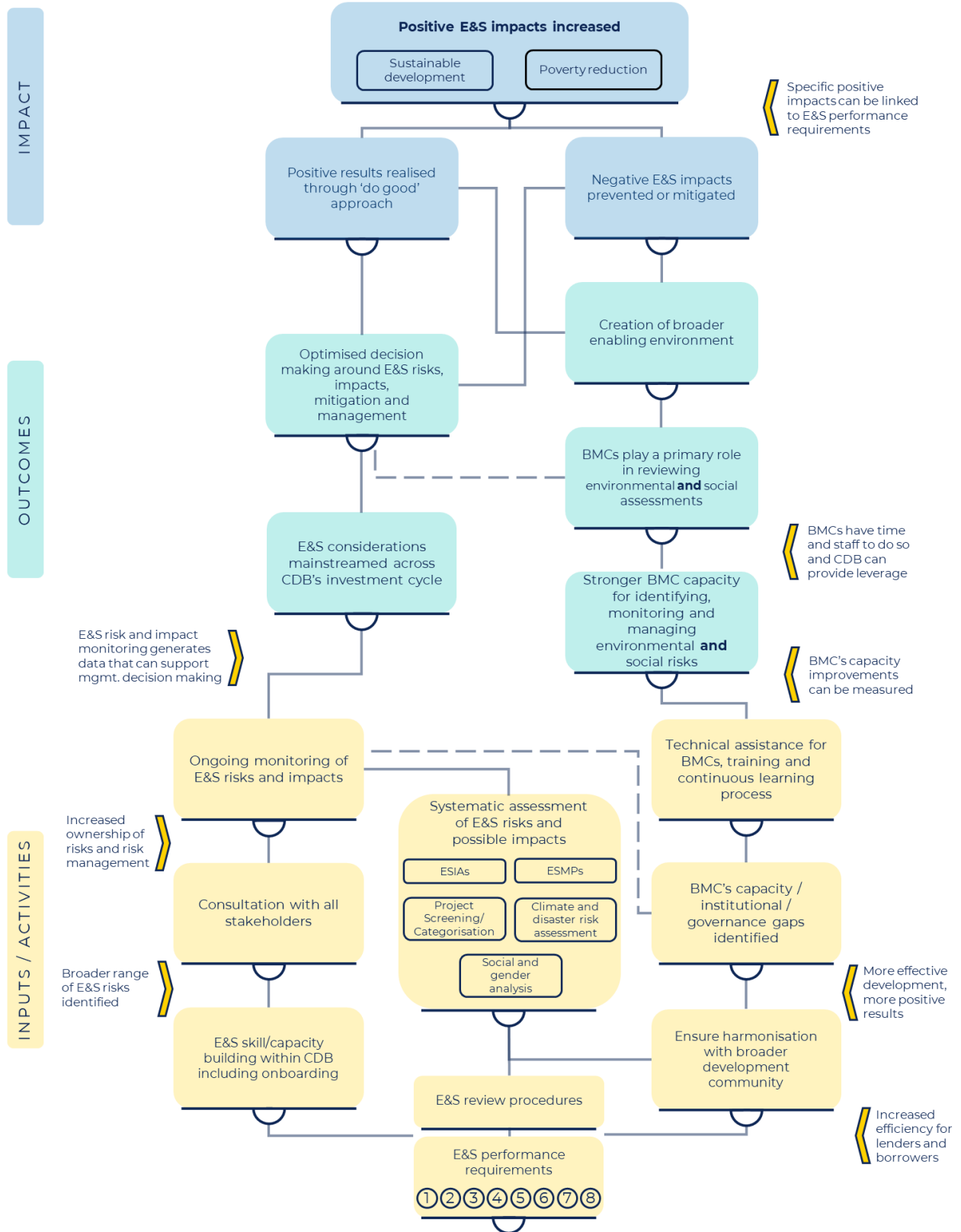
The evaluation serves both accountability and learning purposes, in determining how effectively the ESRP have served the intended purpose and identifying how the procedures can be updated and strengthened (if required). A key consideration is the ongoing work led by the ESU to update and revise the ESRP, taking account of changes in the context of CDB and recent developments in safeguards at other MDBs.

1.2.2 Evaluation Approach

The evaluation is theory-based, which includes reconstructing a Theory of Change (ToC) as a product from the evaluation and using it to interrogate the ESRP and apply the evaluation questions. This allowed a more in-depth study of the extent to which the results (and the sustainability of those results) were affected by critical assumptions in the causal pathways between applying the ESRP procedures and achieving the intended aims of: (i) identifying and managing risks, and (ii) enhancing benefits for citizens of BMCs. The ToC was developed during the inception phase and tested during the findings validation process with the ESU and the SSD. Please see Figure 1 below.

Multiple research methods were used to collect and triangulate qualitative and quantitative data from a range of sources to establish a robust evidence base to inform all aspects of the evaluation. Secondary sources included documents from sampled strategies, projects and programmes showing how ESRP has been applied in CDB country strategies, programme and project appraisal and supervision reports.

Figure 1: ESRP Theory of Change, developed by the evaluation team



1.2.3 Evaluation Questions

The overarching question for the evaluation is: How effective have the procedures been in preventing, managing, and mitigating the adverse environmental and social impacts and risks of CDB-financed operations and in building client capacity to manage environmental and social impacts and risks? Specifically, the evaluation — as per the Terms of Reference — addresses the key questions in Table 1 below:

Table 1: Evaluation Questions (EQs)

EQ	QUESTION
A	How well are the CDB's ESRP suited to preventing, managing and mitigating adverse environmental and social impacts?
	i. How has CDB's ESRP framework evolved over time, including in response to changes in the external context?
	i. How, if at all, have the relevance and adequacy of CDB's ESRP been affected by the evolution of CDB's portfolios?
	ii. What are the lessons and best practices that can be taken from other MDBs' ESRP (or equivalent), noting that these have evolved in recent years?
B	How effectively has CDB's ESRP been applied?
	ii. Are the responsibilities for implementing CDB's ESRP clear?
	iii. To what extent have CDB's organisational arrangements and processes facilitated the effective implementation of safeguards policies?
	iv. Were sufficient budgetary resources allocated to facilitate the application of CDB's ESRP?
	v. How effectively have CDB's ESRP been applied during project identification and preparation, appraisal and negotiation?
	vi. How effectively have CDB's ESRP been applied during project implementation, supervision and monitoring and project completion?
	vii. To what extent have CDB's ESRP appropriately mitigated and foreseen risks of environmental and social impacts and ESRP implementation?
	viii. To what extent do CDB's BMCs have the capacity to effectively support the implementation of the ESRP and fulfil their ESRP commitments?
	ix. Is there an appropriate balance and effort between environmental and social aspects?
	x. To what extent have the ESRP facilitated a focus on outcomes and how to achieve them?
C	What have been the results of CDB's ESRP?
	i. To what extent have CDB's ESRP helped prevent, manage and mitigate environmental and social project impacts?
	ii. To what extent have CDB's ESRP systems and operations helped strengthen BMCs' capacity to manage and mitigate social and environmental impacts?
D	How effectively has the ESU/SSD supported CDB's ESRP?
	i. To what extent have ESU/SSD operations and related management helped address concerns related to the application of CDB's ESRP?

- ii. To what extent have ESU/SSD operations and related management fostered learning and improvement in the implementation of the CDB's ESRP?

1.2.4 Data Collection

The evaluation drew from multiple evidence streams, including an in-depth review of documents from Headquarters and country level, i.e., policies, strategies, etc. (see Appendix 1 for details), a series of 51 interviews and consultations with CDB staff and partners (see Appendix 2 for details), and site visits to four sample countries. See Figure 2 below for details.

Figure 2: Data Collection Summary



The evaluation team sampled four countries, Belize, Guyana, Saint Lucia, and Saint Vincent and the Grenadines, based on the following criteria:

- Countries with four or more Category A and B projects.
- Countries with a range of population sizes.
- Countries with particular projects of interest, e.g., the Port Modernisation Project in SVG, which included a Resettlement Action Plan (RAP).
- Countries with particular environmental or social issues/risks, e.g., marine reserves in Belize or the relatively diverse populations and Indigenous Peoples in Guyana and Saint Lucia.

Country visits were conducted in all four of the sampled countries, including site visits to a range of Category A and B projects. Additional document review was also carried out for these four countries. The projects sampled included all Category A projects across CDB's portfolio and all Category B projects in the four sample countries (see Table 2 below for details).

Table 2: CDB Projects Sampled in the Evaluation

Country	E&S Category	Project
Belize	A	Seventh Power Project (Caye Caulker Submarine)
		Philip Goldson Highway and Remate Bypass Upgrading Project
	B	Enhancing Sugarcane Farmer's Resilience to Natural Hazard Events
		Second Road Safety Project
		Sixth Road (Coastal Highway Upgrading) Project
		Belize Enhancement Sector Reform Programme II
		Third Water–Ambergris Caye
Guyana	B	Hospitality And Tourism Training Institute Project
		Sea and River Defences Project
		Linden To Mabura Hill Road Upgrade
		Skills Development and Employability Project
Grenada	A	Integrated Solid Waste Management Project
Montserrat	A	Montserrat Port Development Project (UKCIF)
Saint Lucia	B	Millennium Highway and West Coast Road Reconstruction Project
		Seventh Water (John Compton Dam Rehabilitation) Project
		Eighth Water (Dennery North Water Supply)
		Saint Lucia Education Quality Improvement Project
St. Vincent and the Grenadines	A	Port Modernisation Project
		St. Vincent Electricity Services Ltd. Utility Battery Storage and Grid-Connected Solar Photovoltaic Project
	B	School Improvement Project–Phase I
		Energy Efficiency Measures and Solar Photovoltaic
		Geothermal Drilling Project (IDB)
		Sandy Bay Sea Defences Resilience Project

1.2.5 Data Analysis

The overall analytical approach to drawing and synthesising conclusions was qualitative. This was appropriate given the relatively rapid nature of the exercise and anticipated limitations in the sectoral performance data available. The documents reviewed and the interview and site visit notes were coded against the evaluation questions and cross-cutting issues in MAXQDA, a qualitative analysis tool, which allowed for the evidence to be triangulated across sources. Appendix 5 provides details of the coding framework and a visualisation of the evidence coded against this.

The team also conducted a review of the project documentation for the projects listed. Using a checklist approach to check whether documentation, Table 2 shows that the ESRP process, Gender Action Plans and climate change vulnerability assessments (CCVAs)/climate risk vulnerability assessments (CRVAs) had been implemented and documented. A further review was also carried out on ten recent (post-2013) Country Engagement Strategy (CES)/Country Strategy Papers (CSPs), including environmental and social analysis, objectives and opportunities as well as Climate Disaster Risk Screening, Gender Marker Analysis and Social Vulnerability Matrices.

In addition, the evaluation team carried out a comparative analysis of environmental and social procedures of five comparable IFIs, including the World Bank, the Inter-American Development Bank (IDB), the Asian Development Bank (ADB), the African Development Bank (AfDB), and the International Fund for Agricultural Development (IFAD).² These IFIs were selected based on the opportunity to learn from their current and evolving practices on environmental and social procedures, which can, in turn, help to feed in lessons and best practices to inform recommendations. The evaluation team included the following aspects of the procedures in the analysis:

- Enumeration of Environmental and Social Safeguards.
- Review Procedures.
- Project Screening and Classification.
- Types of Impacts to be Identified.
- Mitigation Hierarchy.
- Stakeholder Consultation and Participation.
- Grievance Redress.
- Borrower/IFI Institutional and Implementation Arrangements.
- Use of Borrower E&S Framework.
- Documentation Requirements.
- Monitoring and Reporting.
- Emergency Preparedness and Response.
- Disclosure Requirements.

² Environmental and Social Safeguards Analysis Report (2021), GCF, <https://www.greenclimate.fund/sites/default/files/event/mm-background-document-scoping-gcf-ess.pdf>; Safeguard Policy Statement (2009), ADB, <https://www.adb.org/documents/safeguard-policy-statement>; African Development Bank Group's Integrated Safeguards System (2013), AfDB, <https://www.afdb.org/en/documents/integrated-safeguards-system-april-2023#:~:text=In%202013%2C%20the%20African%20Development,policies%2C%20as%20well%20as%20cross%20D>; FAO's new Framework for Environmental and Social Management (2022), FAO, <https://www.fao.org/policy-support/tools-and-publications/resources-details/en/c/1026868/>; Revised Environmental and Social Policy (2021), GCF, <https://www.greenclimate.fund/document/revised-environmental-and-social-policy>; Environmental and Social Policy Framework (2021), IDB, <https://www.iadb.org/en/mpas>; Social, Environmental and Climate Assessment Procedures (2021), IFAD, <https://www.ifad.org/en/-/social-environmental-and-climate-assessment-procedures>; World Bank Environmental and Social Framework (2017), World Bank, <https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf>

The evaluation team then carried out an internal analysis session to cross-check data and findings before holding a findings validation workshop with the ESU/SSD and the OIE to validate findings and conclusions and co-create a set of recommendations.

1.2.6 Limitations

The main limitation relates to assessing project benefits and the results of risk mitigation.

- Although the procedures have been in place for nearly a decade, many of the projects are ongoing. Consequently, it was too early to see the full intended results in the majority of the projects sampled. The evaluation team nevertheless used site visits and interviews to assess the likelihood that benefits and risks had materialised (or will in the future). This evaluation involved asking whether the conditions for results were being met, even if results had yet to be actually achieved. In some cases, the projects reviewed were well enough advanced in implementation that risks would not, in all likelihood, materialise.
- A second limitation is data. Environmental and Social Impact Assessments (ESIAs), Environmental and Social Monitoring Plans (ESMPs), project completion and supervision reports were unavailable for a number of projects, or the coverage and detail available were only partial in a number of cases (details of the documents provided for the sampled projects are included in Appendix 3). This data shortage meant that the key informant interviews were used as a primary source of evidence to provide an up-to-date picture of the application of the ESRP. The data collected on whether the ESRP had contributed to a greater focus on outcomes were also relatively limited. However, the section concerning Evaluation Question C and results to some extent addresses this in addition to the sub-question in Evaluation Question B.

1.3 Report Overview

The following sections map out the evaluation findings against each of the four evaluation questions and further sub-questions, as well as for the two cross-cutting issues covered: gender and climate.

Section 2.1 illustrates findings regarding the suitability of the ESRP to manage and mitigate environmental and social impacts, including the evolution of the ESRP, as well as the evidence from the comparative analysis of other IFIs.

Section 2.2 presents the findings on the application of the ESRP, including the responsibilities, organisational arrangement and process and resources for implementation. Results are also presented for the management of environmental and social risks during the project cycle, including screening and categorisation of projects, assessing risks and developing and implementing plans for mitigation and delivering intended benefits before the evaluation findings on CDB's technical assistance and capacity development for BMCs and other partners. The analysis covers not just the application of the ESRP but also the development and

mainstreaming of environmental and social safeguards and principles across a country/institution more broadly.

Section 2.3 examines the results of the application of CDB's ESRP, including environmental and social impacts as well as improved capacity and influence.

Section 2.4 presents the review of how effectively ESU/SSU specialists support the implementation of environmental and social procedures across the Bank.

Section 2.5 maps out the findings related to the cross-cutting issues addressed in the evaluation, gender and climate.

Section 3 presents the evaluation conclusions and section 4 sets out the evaluation recommendations.

2 Evaluation Findings

2.1 EQA: How well is CDB's ESRP suited to preventing, managing, and mitigating adverse environmental and social impacts?

The evidence collected for this evaluation, which includes documentary analysis and key informant interviews (both in CDB and in-country), is that CDB's ESRP is fit for purpose. There is also widespread recognition that the application of the ESRP has been strengthened over time through both increasing sensitisation and training of CDB staff and country officials and enlarged staffing with CDB environmental and social specialists. Stakeholders also believe that the treatment of environmental and social considerations has become increasingly holistic since the introduction of the ESRP in 2014. CDB staff confirm that they recognise the central importance of the procedures and that there is a good understanding of them, even though there has been a learning curve, particularly around the social aspects of the ESRP. While internally, there are views that CDB staff broadly place more emphasis on environmental aspects of the ESRP, at the same time, there is evidence around the increased focus, particularly on gender issues in the past three years, driven in large part by the development and operationalisation of the Gender Equality Policy and Operational Strategy (GEPOS), as well as gender mainstreaming procedures (this is strongly supported by the interests of Canada as a donor member of the Bank). In subsequent sections of the findings, examples emphasise the social aspects based on the field missions.

In most situations, BMC implementing partners expressed a positive view of CDB's procedures as being fit for purpose. In the case of the Belize power projects, stakeholders noted that the requirements can be "quite demanding, but we understand the need for them". Several BMC representatives noted that in any case they were applying similar standards to those required by CDB through their own national systems, typically driven by the need to get approval from their environment departments for major infrastructure projects. For instance, Belize and Guyana view their environmental standards as being on par with those of the ESRP, thanks to the oversight of their respective Departments of Environment (DoE). Conversely, SVG boasts robust social standards, which are overseen by the social safeguard team within the country's Ministry of Finance. It should be noted that this was based on the perceptions of BMC stakeholders interviewed and thus reflects just one perspective (albeit an important one). The ESRP states that the ESIA process must satisfy BMC national legislative requirements at a minimum but should aim for international best practice such as those of the World Bank Group Environment Health and Safety Guidelines, the European Commission-Joint Research Centre, and ISO1400 as well as the international core labour standards of the International Labour Organization.

Some of the evidence points to areas where ESRP could be improved, in the view of the evaluation team, based on analysis informed by documentary review and key informant interviews. For example, in the case of the Belize roads projects, while they did refer to the ESRP for certain specifics, such as the ESMPs for contractors and the grievance mechanisms, the ESRP documentation was otherwise outdated or lacking in guidance that could be used to address specific gaps in Belize and Guyana. It is worth noting that key

informants stated that their own environmental standards are higher and/or it is more useful to refer to the IFC principles or DoE requirements, including for developing ESMPs, although this view is not shared by CDB officials: “We could not refer the contractor to the documentary sources; rather, they would look to draw on our own experience for guidance”. Based on the evidence collected here, greater reference to national and international frameworks is needed in the ESRP document itself, based on mapping exercises as a prelude to applying the ESRP in BMCs. International standards can be more explicitly referenced to give a specific reference point to BMCs and contractors.

All the sampled CESs prepared after 2014, when the ESRP was approved, contained an adequate level of environmental and social analysis,³ had environmental and social “pillars”, and identified potential opportunities for support in these sectors. Climate and disaster risk screening and social vulnerability matrices were included in 8 out of 10 and 7 out of 10 sampled CESs, respectively. Broadly speaking, this suggests that the ESRP has been effectively mainstreamed, thereby increasing its relevance.

2.1.1 How has CDB’s ESRP framework evolved over time, including in response to changes in the external context?

The ESRP builds on older versions of CDB’s environmental and social safeguards policies and the experience gained in their application, notably the Environmental Review Guidelines (1994) and the Guidelines for the Social Analysis of Projects (2004), which prior to the ESRP served as the primary guidance documents for assessing the environmental and social dimension of its operations. The 2014 revision of the safeguards policy was motivated by two principal factors. The first was to align with the evolution in thinking and approaches by the broader development community in addressing issues of environmental and social sustainability and poverty reduction, including the need for enhanced dialogue, participation and consultations with all stakeholders, systematic assessment of impacts and risks, a greater focus on the analysis of the social dimensions of development initiatives, and greater effort to harmonise policies and procedural requirements with the wider development community to improve development effectiveness. The second was to provide more effective support to BMCs to address issues they identify as priority concerns that are central to their efforts to reduce poverty and to achieve their sustainable development objectives, including strengthening their capacity to undertake environmental and social screening and to design and implement judicious risk mitigation measures in development initiatives.

The ESRP should be seen as complemented by the GEPOS and the Disaster Risk Management (DRM) policy. The responsiveness of the ESRP, together with the complementary policies to various challenges that have grown in importance in recent years (notably those related to climate change, DRM, gender, and labour), has generally been good since CDB has effectively responded to these challenges.

³ Two CESs contained climate rather than environmental analyses.

2.1.2 How, if at all, have the relevance and adequacy of CDB's ESRP been affected by the evolution of CDB's portfolios?

Regarding the evolution of CDB's portfolio of investment loans and policy-based loans (PBLs) over the period 2014–22, few clear trends can be discerned. However, one notable feature is the rapid rise in the value of new approvals in the transport and communications sector. From just over USD200 million (mn) in new approvals in this sector in 2014, the value of new approvals had climbed rapidly to well over USD600 mn by 2021. As a result, the aspects of the ESRP that relate specifically to transport and communications projects, such as roads and port projects, would have increased in relevance. These would include mitigation issues related to drainage, dredging, involuntary resettlement, and climate vulnerability.

Conversely, the value of approvals of new public sector management projects appears to have stagnated, if not declined, over the evaluation period, going from over USD200 mn in 2015 to barely USD100 mn in 2021. This decline suggests that aspects of the ESRP relating to these projects, such as strengthening client capacity, have seen a decline in weighting relative to other aspects of the ESRP. These inferences are based on the reasonable assumption that lower approved amounts typically mean lower administrative budgets for project preparation and supervision. Concerning the future, referring to the priorities set out in the Strategy Update, CDB's focus is evolving to address the challenges the region faces following the COVID-19 pandemic, for example, making up for the educational losses incurred during the pandemic. The ESRP and particularly the social elements of the procedures are likely to be highly relevant in this work. The update should provide treatment of social issues such as the greater exclusion and inequality that have emerged as a result of the pandemic (loss of income due to dependence on tourism, rising inflation, tightening financial conditions) and of the measures that could be taken to address them with CDB support (ensuring that emerging vulnerable groups are benefiting from interventions).

In general, PBLs are used for budgetary support to help stimulate economic growth and solve development challenges, including social elements. The ESRP approach CDB uses concerning PBLs requires the Bank to determine whether specific policies supported by a PBL are likely to have significant poverty and social or environmental effects. If potential adverse effects are identified, an assessment is undertaken that details the BMC's capacity to manage such effects and, if gaps are identified, how they will be addressed. On this basis, it can be inferred that the ESRP applies partially to PBLs. In addition, PBLs sometimes make provision for technical assistance (TA) for specific gaps, and they are usually targeted at policy reforms, with disbursements made based on actual policy reforms achieved. However, there is an issue related to PBL tranches that merits attention. In the case of one-tranche PBLs, CDB may have little leverage over BMCs to incentivise the application of environmental and social safeguards, whereas they are better able to exercise such leverage with multi-tranche PBLs.

2.1.3 What are the lessons and best practices that can be taken from other MDBs' ESRP (or equivalent), noting that these have evolved in recent years?

The environmental and social safeguards policies of other IFIs reviewed for this evaluation (the World Bank, the IDB, the ADB, the AfDB, and the IFAD) are broadly similar to CDB's ESRP. However, there are a few significant differences. First, several IFIs' environmental and social safeguards policies explicitly treat the following aspects as core safeguards:

- Gender, including gender-based violence (GBV) and sexual exploitation and abuse (SEA).
- Indigenous Peoples.
- Projects that the CDB finances through financial intermediaries (FIs).
- Stakeholder participation and consultations.

In contrast, CDB's ESRP does not treat these aspects as discrete core safeguards, although Indigenous Peoples are explicitly referenced under a core safeguard concerning vulnerable populations. The section on consultation and participation in the ESRP document provides in-depth guidance on the factors that make for "meaningful public participation". Moreover, although there is mention of which groups should be considered (e.g., the elderly, disabled, and Indigenous Peoples) within the PR "Vulnerable Groups", the list is incomplete (for example, it does not include people living with HIV or members of the LGBTQI+ community), and the PR does not address intersectionality and the challenges and processes for identifying and involving these groups. It is also indicated that an Indigenous Peoples Development Plan (IPDP) "may be required", but there is no further guidance on what the IPDP would look like. CDB management may wish to consider treating these aspects as core safeguards, thereby considering Gender Equality and Social Inclusion (GESI) in a more nuanced and effective way (identifying with precision vulnerable groups and understanding their specific needs and particular perspectives in order to formulate appropriate and tailored support strategies). In SVG, one of the schools constructed with CDB financing did not consider students who were wheelchair users, thereby eliminating access to classrooms and the cafeteria for these students in the initial design. At another school, safety measures were taken into account, but not the effect of these measures, which was to eliminate access to the girls' basketball team, an important social and physical activity for girls and the school.

Second, the ESRP currently provides detailed, precise guidance on classifying projects' environmental and social risks and impacts (see Appendix 2 of the ESRP). However, the guidance could be even more detailed and nuanced, making more explicit reference to (and requiring a separate classification for) projects' climate-related risks. A good practice in this area appears in IFAD's environmental and social safeguards policy. For example, the ESRP currently indicatively suggests that projects involving the construction or rehabilitation of dams would be classified as Category A (although this was not the case for the John Compton Dam Rehabilitation Project in Saint Lucia, which was classified as Category B). In contrast, IFAD's safeguards policy only requires dams above a certain threshold on height and reservoir capacity to be classified as Category A while allowing projects involving dams below the threshold to be classified as Category B.

IFAD's policy does not, however, consider other factors, such as location, which may affect risk and may be worth factoring into the decision on classification.

Third, several IFIs' safeguards policies explicitly reference a mitigation hierarchy for environmental and social impacts/risks. In the case of the ESRP, while the mitigation hierarchy emerges clearly, it is not explicitly referred to as such. CDB management may wish to consider whether the next iteration of the ESRP could usefully make such an explicit reference to the mitigation hierarchy.

Fourth, several IFIs' safeguards policies offer detailed guidance on the conditions under which BMCs' environmental and social frameworks can be used in lieu of their own safeguards policies to manage environmental and social risks and impacts. The ADB's environmental and social safeguards policy offers a good-practice example of such guidance, including details regarding the necessary assessments of country frameworks before approval is given, in which joint approaches with other IFIs are preferred. CDB management may wish to consider whether the next iteration of the ESRP should make similarly explicit reference to the conditions under which country frameworks may be used in conjunction with the ESRP. It should be clear, of course, that even where the CDB ascertains that a BMC's E&S framework is suitable for use, this will not relieve the CDB of the due diligence obligations established in the ESRP.

Fifth, several IFIs' safeguards policies explicitly reference emergency preparedness and response mechanisms in projects to cover events such as pandemics, natural disasters, and the adverse effects of climate change. CDB management may wish to consider whether the next iteration of the ESRP should explicitly reference emergency preparedness and response mechanisms in projects.

Finally, one rule in IDB's environmental and social safeguards policy states that offsets are not an acceptable mitigation strategy for critical habitats. In effect, this prevents situations where project-related activities damage or destroy critical habitats from occurring, even if an offset is proposed. This rule is widely considered to constitute best practice, and CDB management may wish to consider whether the next iteration of the ESRP should embody such a rule.

2.2 EQB: How effectively have the CDB's ESRP been applied?

2.2.1 Are the responsibilities for implementing CDB's ESRP clear?

There is a wider understanding of the ESRP across CDB that goes beyond basic awareness of environmental and social issues, with the majority of interviewees appreciating the need to apply ESRP in their work. CDB project supervisors now routinely consider social and environmental factors in their work, something that was not always the case prior to 2014 and the development of the integrated ESRP. This shift in understanding has resulted from continuous work on the part of ESU/SSD to mainstream social and environmental factors across the CDB's work. As a result of their continued efforts and expanding team, the ESU/SSD's social and environmental expertise is well regarded, both internally and externally. In addition, CDB staff have

developed strong relationships and communication with BMCs, which is a crucial factor in partners trusting CDB and taking on responsibility for implementing the ESRP.

Responsibilities for applying the various elements of the ESRP process are identified as part of the appraisal process and are generally very well documented in project designs. In general, this had led to responsibilities for ESRP application being clear internally for CDB staff. This clarity seems to translate into an on-the-ground understanding of responsibilities amongst project implementation teams:

“Responsibilities are always relatively clear: part of the appraisal process is to identify and confirm who will do what throughout the project cycle” (Interview, External Stakeholder Guyana)

Contractors carry considerable responsibility for the implementation of ESMPs, and feasibility studies, ESIA and monitoring are generally conducted by supervision consultants. ESMP requirements are cascaded into bid and contract documents. However, contractors have less incentive than the CDB or BMCs to ensure that post-appraisal monitoring is carried out, given that there are fewer immediate benefits for contractors and that they have less accountability to beneficiaries. Therefore, the adequate implementation and documentation of ESMPs require suitable incentives for the contractors, either through contracts or increased supervision. This is currently an area of weakness. In the view of the evaluation team, taking account of the evidence collected, it would be useful for contractors to understand better at an early stage what their responsibilities are in applying the ESRP. This awareness would help to ensure that their human and financial resourcing proposals are adequate to cover application throughout the project.

2.2.2 To what extent have CDB’s organisational arrangements and processes facilitated the effective implementation of safeguards policies?

CDB’s internal capacity has grown, with the ESU/SSD now acting as an integrated unit. It was noted that environmental and social analysts are now working in a more coordinated way in CDB. Previous to the ESRP, there was a perception of environmental and social aspects as separate workstreams, whereas internal and external stakeholders now view ESU/SSD as working in a more integrated and complementary manner.

A separate issue is that the environmental and social analysts are stretched — in the sense of having to cover many projects with relatively few staff — which can impact timeliness. There were delays in some cases, where analysts were unable to conduct country visits or where there were lengthy administrative processes. CDB response times were seen as slower than other agencies, including in communications and letters of no-objection. BMCs also put this down to having to apply the ESRP for every project, perhaps reflecting the need to engage more frequently with BMCs to better enable understanding of ESRP application. However, the evaluation team notes that there are obstacles to implementing a more streamlined process, including the country’s capacity and willingness to take ownership of E&S risks. Therefore, some BMC stakeholders were critical of the turnaround time from CDB, with interviewees putting this partly down to a lack of in-country staff and bureaucracy in the implementation of the ESRP.

Furthermore, there is a heavy reliance on specialists to conduct ESRP-related tasks in projects in CDB. For example, the instinct of project officers was to say that it was the responsibility of the E&S specialist rather

than a task they may be able to undertake themselves, e.g., ongoing tasks related to monitoring ESMPs. In addition, project officers cover multiple projects and are selective about where time is spent.

However, in all of the countries sampled, E&S specialists are not always available in the region to implement the ESMP.⁴ For example, an environmental specialist was unavailable for the eighth consolidated line of credit for the Dominica Agricultural Industrial and Development Bank (DAIDB), the Sixth Power Project in Belize suffered from lack of capacity to implement the environmental safeguards due to the lack of an environmental specialist, and there were also issues in finding a reliable environmental specialist in Guyana for one of the sites in the Skills Development and Employability Project. Gaps were also reported in social safeguarding expertise across the sample countries. It was also noted that there is little support (human and financial resources) to oversee adherence to ESRP from sub-loans/sub-borrowers.

There is evidence that the lack of specialists available to contract to implement the ESMP was recognised and acted upon in several countries (e.g., the Seventh Power Project in Belize included an environmental specialist to address the capacity gap in the aforementioned Sixth Power Project). Furthermore, CDB has prepared a request for expressions of interest to develop an E&S specialist/consultant roster across the region.

2.2.3 Were sufficient budgetary resources allocated to facilitate CDB's ESRP application?

The “hard” financial resources for implementing the ESRP, including the ESMP, were found to be adequate, provided that the financial costs for implementation were figured into project proposals by contractors at an early stage. However, this does not always happen, and training for contractors would be useful from the pre-bidding stage onwards to mitigate this risk. For example, such training is not yet provided in Guyana, and contractors have not fully allowed for implementation costs.

Such training was also viewed as an opportunity for direct engagement with contractors, preventing any misunderstandings. Project launch workshops were emphasised as crucial moments for offering additional, project-tailored instruction about the ESRP's environmental and social safeguards, as well as their impact on project resourcing and execution. It was also highlighted that certain engagement aspects, especially concerning social safeguards and mitigation, might incur higher costs than initially foreseen. Hence, project launch workshops and training could support in estimating the resources needed to effectively implement the social aspects of these safeguards.

A related but separate issue is that the available resource is also concentrated more on the initial screening and appraisal stages than on monitoring and follow-up. Contractors tended to include the majority of resources in the assessment/appraisal phase, with relatively less allocated for monitoring and follow-up on the ESRP. The evaluation team considers that this may reflect the financial incentive for contractors to ensure timely approval of projects, i.e., it is in their interest to have projects approved and begin implementation as fast as possible.

⁴ This finding is also noted in the ‘Evaluation of CDB's work through development finance institutions and other financial intermediaries (2012–19)’.

2.2.4 How effectively has CDB's ESRP been applied during project identification and preparation, appraisal and negotiation?

A thorough preparation and appraisal process with a strong gender review component

During the project preparation and appraisal stages, the Environmental and Social Screening Memorandum (ESSM) is prepared by the ESU and the SSD to determine the project category. A feasibility study and/or an ESIA is conducted by BMCs, after which the ESU and SSD draft the Terms of Reference, which are finalised by BMCs for environmental and social assessment instruments (as applicable), including the ESIA and ESMP, Environmental and Social Management Systems, Environmental and Social Management Frameworks, and Climate Risk and Vulnerability Assessments. The ESU and SSD review and provide a letter of no objection for assessment reports; the gender focal points will also review the ESIA, develop a gender analysis based on the ESIA, and determine the project's Gender Marker score from this. The ESU and SSD prepare summaries of the environmental and social assessment reports for inclusion in the project appraisal document. Depending on the Gender Marker score, a Gender Action Plan will also be developed to ensure gender-responsiveness in design and implementation. This means, in theory, projects will be working to combat discriminatory practices, reverse gender-based discrimination or inequalities and ensure equal opportunities for men and women to participate and benefit in project identification. The gender analysis determines if the project is at risk of overlooking existing gender inequalities (and thus reinforcing them); this could include areas such as access to productive resources, goods, services, markets, decent employment and decision-making. The Gender Action Plan will suggest ways of considering the specific needs and priorities of women and girls, specific to the country context and its gender-related risks (i.e., if a country has higher rates of GBV) and propose mitigation actions accordingly.

A high degree of focus on project preparation

Initial screening undertaken by E&S officers is against the eight PRs, which informs the project risk categorisation and the nature of the environmental and social assessment to be undertaken during the project feasibility studies. The level of effort is commensurate with the identified risks and impacts. Both Executing Agency staff interviewed, and CDB staff perceive that there is a high level of focus and effort placed on the ESRP during the feasibility, appraisal and negotiation stages of a project. As noted in the capacity section below, BMCs are increasingly aware and appreciative of the importance of the ESRP and, in most cases, recognise how their own regulations and policies are aligned with it. Across the BMCs interviewed, as well as some CDB staff, that while the ESRP processes at the “front end” of project development are thorough, they can also be overwhelming. As the quotation below highlights, internal and external stakeholders found that the breadth of the ESRP requires strong communications to ensure that the various elements are implemented:

“There’s so much to remember — you need a checklist for everything. We do so much screening of so many different elements. In order for that to be maintained we need reminders, alerting, broader education, and cross-training within the CDB team. We need to have an awareness of everyone else’s role so that if countries or partners ask us questions, we can refer them to the correct specialist”. (Interview, CDB)

BMCs have requested further guidance on the ESRP, including the requirements at various project cycle stages. For example, BMCs asked that the ESRP be visually straightforward to follow for the more general categorisation, more detailed guidelines and easy-to-complete (possibly digitally) templates on the specifics.

The evaluation team notes that the ESU/SSD are planning on implementing training sessions following the update of the ESRP, which, together with accompanying, visually engaging, and easy-to-follow guidance notes, would help clarify the process. See Section 4, recommendation 5 for further details.

A slow start to activity implementation

Interviewees in BMCs understood the reasons for frontloading the ESRP process, but the time and effort taken have still produced some frustration as BMCs, particularly those with riskier projects that require more attention to the ESRP process, want to advance with the main project activities and investments as quickly as possible.

A focus on ESIA

ESIAs draw on an analysis of secondary data (country gender assessment, a climate-relevant policy and legal documents, reports, poverty assessments, census reports, and labour force surveys, among others). The process also includes site visits and consultations with stakeholders (this varies from project to project – some will convene stakeholders in a validation workshop). The evaluation team found that, in some cases, more could be done to clarify and map out potential requirements for the ESIA stage. An example of a project with a Category A rating that has successfully applied the ESIA is the oft-cited SVG Port Modernisation Project. The project design was informed by an ESIA and Climate Risk Vulnerability Assessment undertaken by consultants retained by the SVG government prior to the appraisal, in which potential social and environmental impacts and corresponding mitigation measures were identified. The economic displacement, including livelihood loss, was of particular concern and importance due to the need to relocate vendors in the cargo port construction area. The resettlement of households and fisherfolk was being finalised during this evaluation. Information collected from those affected groups of people determined the degree of the negative impact different individuals, families and groups would feel from the project (i.e., if they were losing a business versus if they were losing a shelter) and outlined the constraints and opportunities for addressing these risks.

It was found in the evaluation of Cluster Country Strategy and Programme Evaluation of OECS and Overseas Development Territories Borrowers (2010–18) that ESIA were often not completed in time to inform initial decision-making.

Community engagement

The importance of community engagement is widely recognised as important for access to local knowledge, relationship building, buy-in, effective targeting, and early sight on grievances, as well as a mechanism to engage with different groups of women and men (i.e., students, teachers, fisherfolk, small business owners, Indigenous Peoples, and those who are unhoused, etc.), all of which are essential for the identification, understanding and management of project’s environmental and social impact. The ESRP (page 9) states that:

“CDB requires the borrower to provide evidence to demonstrate that there has been ‘meaningful consultation and participation’ of affected persons for projects requiring comprehensive environment and social impact studies and that there be full disclosure of the

findings of these studies”. Meaningful consultation and participation require a satisfactory stakeholder analysis and provide for full and diverse participation; timely disclosure of information; respect of culture and knowledge practices of vulnerable groups and communities; and gender-inclusive and responsive consultation and participation”.

The evaluation found that stakeholder participation varies from project to project, and the degree of participation also varies across different stages of the project cycle. Some projects prioritise participation in analysis and planning, while others focus on disclosure and dissemination of information. All projects reviewed have grievance mechanisms. However, contractors on the projects reviewed gave reporting to project-affected people (PAPs) relatively less priority.

In SVG, the Port Modernisation Project prioritised public consultation; these were held extensively with PAPs and a range of other key stakeholders, including the business community, government ministries and agencies, Non-Governmental Organisations (NGOs) and Civil Society Organisations (CSO) (18 consultations in total have been held). Separate meetings were convened for women, men and youth, using differential participatory techniques to hear the voices of vendors in the populations to be relocated. A Project Information Booklet (PIB) was prepared by the Resettlement Action Plan (RAP) consultant and shared with PAPs and other key stakeholders. The PIB provides information on the project, including SVG’s government’s policy on compensation, assistance with relocation and resettlement, and the proposed four-phase construction programme. In addition to wide stakeholder consultation, facilitated by the Community Liaison Officer and supported by CDB staff during country missions, two strategic consultancies were undertaken (financed by the CDB and DFID) to specifically design the RAP and the Socio-economic and Livelihood Enhancement Study, respectively, using a participatory methodology involving PAPs and other key stakeholders.

In Guyana, the preparation of the Sea and River Defences Project ESIA did entail the conduct of public consultations in all of the project communities, and the concerns of residents are reflected in the draft ESMP. Beneficiary communities have access to relevant documentation that may affect them in order to remain informed about implementation.

The Northern Highway Project in Belize is classified as Category “B” under the Bank’s ESRP. Significant social risks are not anticipated, and tremendous positive social impacts are expected for beneficiaries (all categories of road users along the Northern Highway) during and after project implementation. In addition to triggering the Worker/Community Health and Safety Safeguard, the project triggers the Safeguard for Vulnerable Groups, including Indigenous Peoples, emphasising the need for culturally appropriate messaging and information transfer to differentially affected populations.

Meaningful stakeholder consultation is a critical feature of project preparation and appraisal and should be continued during implementation; the Community Liaison Officers (CLOs) play vital roles in making consultation meaningful, timely and relevant, and some do this more effectively than others. BNTF is CDB’s main poverty reduction programme, providing grant financing to reduce the incidence of poverty in low-income vulnerable communities primarily by improving access to new and upgraded basic social infrastructure and training. Its focus on community development prioritises community participation in risk identification and mitigation monitoring and in encouraging meaningful participation of community leaders, women’s groups, and households. Lessons from BNTF’s processes and tools could be adopted and adapted in the stakeholder engagement process of the ESRP to encourage the active participation and leadership of diverse community members in projects that affect their well-being.

Requirements related to stakeholder engagement are not part of a dedicated standard, but there is a recognition that ongoing stakeholder engagement and information disclosure are critical parts of the ESRP process. The ESRP encourages BMCs to engage early and throughout the project cycle.

2.2.5 How effectively have CDB's ESRP been applied during project implementation, supervision and monitoring and project completion?

The environmental and social performance of projects is meant to be monitored on an ongoing basis to assess the level of compliance with the standards outlined in the ESRP and with the mitigation measures/activities agreed upon at approval or during supervision activities.⁵ The extent and mode of this monitoring concerning environmental and social performance would vary in proportion to the risks and mitigation actions of each project. Monitoring, supervision and evaluation or project completion are multi-faceted. Implementation of the ESMPs includes environmental monitoring during construction. The EMP will gather the information to determine the effectiveness of the remedial activity. For example, in the Grenada Integrated Solid Waste Management Project, the ESMP included a multitude of monitoring aspects — groundwater, surface water, drainage control, leachate control, etc. — and included a schedule and regime. The contractors are monitored for their compliance with the ESMP and their timeliness in implementing any of the plans they are responsible for (i.e., DRM Plan, Waste Management Plan, GRM, etc.). This may happen weekly, monthly or every few months.

Depending on the project, there are different human resource arrangements for conducting monitoring. In some cases, supervision consultants are responsible for supervising the works and will monitor contractors' performance and report the findings in their periodic progress reports. In other cases, such as the Belize Seventh Power Project, an Environmental Monitoring Consultant (EMC) will be appointed to implement the EMP in collaboration with the Project Management Unit (PMU) (which has overall responsibility for monitoring ESMP implementation, as provided in the loan and, and for submitting supervision reports periodically on their implementation performance as part of routine reporting requirements). In the case of Belize, other entities, such as the DoE, do spot-checks, sometimes unannounced.

The supervision process includes the following: supervision consultants and contractors provide technical supervision reports to the Project Coordinator (PC). The PC monitors the completion of activities of the management plan based on these technical reports and submits quarterly or semi-annual reports to the Bank. Evidence from the field shows there did not appear to be a standard reporting process. As an example, one project in SVG cited quarterly reports, while another said,

“We don't have any reporting requirements for the CDB [...]. I might just call the PC and flag any issues worth discussing”. (Interview, SVG).⁶

⁵ The agreed actions to mitigate risks against the ESRP standards are set out in the ESMP document, which forms the main basis for ensuring compliance, risk management and achievement of results during implementation.

⁶ Please note that the evaluation team have not had access to the supervision monitoring reports. If CDB can provide these, we can update the finding based on review of these documents.

While borrowers are required to monitor and report to the Bank on their compliance with the ESRP requirements, CDB also monitors the BMC's compliance through site visits or through independent monitoring arrangements to ensure environmental, social and gender compliance. CDB site visits decreased drastically due to pandemic restrictions. However, monitoring and supervision continued virtually and to a degree more frequently in some countries, according to CDB staff. Other countries claimed that:

“There is a shift after the project is approved; CDB drops off, and there isn't as consistent monitoring or feedback on reports, and little follow-up on the ESMP (oversight to ensure the ESMP is being fulfilled, including awareness-building with contractors”. (Interview, SVG).

This view was shared by CDB staff:

“The follow-through may be a bit of a gap once the responsibility falls to the Project Management Unit. We rely on the reporting and periodic supervision missions, but there are significant capacity constraints, and the reporting may not be as good/consistent as we would like, nor do the missions happen as regularly”. (Interview, CDB)⁷

This limitation adds to the risk of incomplete ESMPs, as noted by another staff member:

“We ensure that contractors have various ESMPs in place, and this is always the case. But often when we visit and ask for the records of activities undertaken to deliver the ESMP, it transpires that (even though plans were in place), the ESMPs weren't always executed in full”. (Interview, CDB)

The ESRP states, “Supervision and Performance reports shall include a section on the status of implementation of any ESMP, including those measures required to avoid, minimise or mitigate environmental and social risks and/or impacts”. The evaluation team had no access to supervision reports, and the two Project Completion Reports (PCRs), which were shared, did not have distinct sections on the ESMP (please see Appendix 3 for the list of documents). Given those gaps, it is difficult to ascertain whether PCRs assess the project's contribution to outcomes achieved, including those outcomes associated with the ESMP.

The analysis of the documents shows that there is little evidence of monitoring the mitigation measures of social risks or the grievance mechanisms. This finding may be influenced by the limited number of available documents. Evidence gathered from interviews and field visits indicates that supervision reports normally contain a chapter that deals with ESMP issues and includes insight into any incidents. However, there are challenges in monitoring and follow-up of social risks, something that came up consistently in various countries. As one interviewee in Belize noted:

“[T]he monitoring on the social side is quite weak. External review mechanisms do not seem to be in place, specifically for the social risks. It is difficult because of the workload (covering about 50 different projects) and because social issues tend to get forgotten if there is no representative there. Social issues are very complex; we have policies that have indicators covering issues such as crime, gender, and so on. These indicators, if better understood, could

⁷ Please note that the evaluation team have not had access to the supervision monitoring reports and the majority of ESMPs for the projects sampled. If CDB can provide these, we can update the finding based on review of these documents.

be used within the projects. It is important to go beyond a box-ticking approach to the social issues, getting into sufficient depth”. (Interview, Belize)

2.2.6 To what extent have CDB’s ESRP appropriately mitigated and foreseen risks of environmental and social impacts and ESRP implementation?

The evaluation team does not have sufficient documentation to ascertain the extent to which CDB’s ESRP has appropriately mitigated and foreseen environmental and social impact risks based on the projects selected for the ESRP evaluation. ESSMs appear to be a vital tool for establishing foreseen risks, and ESIA’s and ESMPs are the mechanisms for which the risks are identified and analysed further and appropriately mitigated. Based on the documentation, a handful of examples shed some light on the adequacy of risk coverage.

The recent *CDB Evaluation of the Energy Sector Policy and Strategy* (2022) found that environmental and social assessments were not carried out in a systematic manner for energy projects, despite all project teams having environmental and social staff to ensure the execution of environmental and social plans. The evaluation states that “these are often carried out at late stages, which means that environmental and social issues are partially or not always properly considered within projects”. Gender mainstreaming remains a challenge at both the project and strategic levels. A lack of awareness, as well as weak capacity and accountability, lead to limited gender analyses at both the project and strategy levels, which undermines the effective integration of gender perspectives in the ESPS and its projects (page 43).

The first phase of the Port Modernisation Project in SVG was to resettle those individuals affected by the new port. The Resilience Action Plan identified 110 females and 124 males who needed to be relocated to ensure access to sites to commence the cargo port and terminal construction. The Resilience Action Plan was prepared through a series of stakeholder consultations with the affected persons and commercial entities, as well as with the Resettlement Action Committee (RAC) established by the SVG government. Relocation sites were identified, ESIA’s were undertaken for those sites, land acquisition processes were completed, and individuals, families and businesses were relocated with only one grievance. Compensation packages were calculated against a number of factors. Fisherfolk were also compensated for early removal, storage, and vessel improvement allowance, and help was provided for them to move to another beach. Businesses were compensated for loss (even though the businesses were informal), and vulnerability allowances were distributed to those in the area who were homeless. According to the CLO and some of the residents, a cursory review revealed that residents feel positive about their new houses and are comfortable there. However, they lack transport, which is now an important factor in getting into town as they are now fairly far away. Lack of transport (few bus operators want to go to the residents’ new location) means that those residents may not have many livelihood options (although a Socio-economic and Livelihood Enhancement Study was conducted, and there is a Livelihood Restoration Assistance plan).

Some examples require clarification to fully understand how the risk was mitigated in a way that brought about positive project outcomes. For example, the Sandy Bay Sea Defences Resilience Project in SVG identified unequal hiring practices in construction-related activities (with preference given to men), with the Country Gender Assessment indicating that employment of women in the sector is constrained by a “lack of awareness” (unspecified) and lack of encouragement of women to apply. The proposed measure was to

“close this information gap by sensitising both the contractor and communities, in particular women, to pursue employment opportunities. The PC will be supported by CDB staff during implementation to target three critical stakeholder levels — contractors, workers and community members in order to increase women’s employment opportunities”.

It is unclear how this will decrease the “risk” of construction continuing to be a male-dominated sector, nor is it clear what is meant by “targeting three critical stakeholder levels” to increase women’s employment opportunities. To the evaluation team’s knowledge, no monitoring has been done to determine an increase in women’s employment opportunities. A similar example of disproportionate employment opportunities was cited with the SVG’s electricity authority, VINLEC:

“VINLEC, the Project Implementation Team and PC to actively identify a strategic approach to increase employment opportunities of vulnerable groups including women, youth and Persons with Disabilities during project implementation. During the construction stage, there will be employment opportunities in areas including *inter alia*, site clearing, and foundation excavation. The Project would require workers at the different stages, and contractors will be encouraged to utilise both skilled and unskilled labour from the community”.

The Sandy Bay Sea Defence Project in SVG identified a buffer area to be developed to provide space for recreational and economic activities to continue (and even expand) and has also identified the protection of the community’s cemetery as important for religious celebrations and the spiritual connection of the indigenous Garifuna population. Works have not yet begun to demonstrate whether these mitigation strategies have been successfully implemented.

2.2.7 To what extent do CDB’s BMCs have the capacity to effectively support implementation of the ESRP and fulfil their ESRP commitments?

Overall, the evaluation found that BMCs do have the capacity to effectively implement their ESRP commitments, particularly with support (which varies, according to need) from CDB. What could be defined as ESRP’s core guiding principles (proportionality, outcomes orientation, transparency, “do better”, stakeholder engagement, gender equality (GE)) are not mysterious or controversial (although support for GE through national gender machineries and institutional frameworks is still poorly resourced according to CDB’s 2020–2024 Gender Equality Action Plan, and although there is less resistance to GE, this has taken years of sensitisation and support such as training). These core principles, as well as some of the PRs, are already aligned with BMC policy and practice, as well as with other organisations’ safeguard policies that the BMCs may utilise. According to CDB staff, two or three BMCs still need some nudging to remind them that the ESRP is aligned with the global frameworks that BMCs are already signatories to and that have been ratified and translated into national laws, and/or national legislation and regulations concerning environment and social well-being (as an example, the government of Belize has made significant strides in improving environmental sustainability, including updating its legislation and regulations concerning assessment of environmental risks, drafting legislation and regulations concerning marine pollution prevention and developing a land use policy and a land use planning framework).

Several CESs also made provisions for the capacity-building of countries’ national frameworks. For example, SVG’s 2022–26 CES results framework includes integrating environmental and social safeguards into

national policies as TA. It also states that “develop environmental and social review procedures to facilitate the integration of safeguards in national policies” and “training in the development of safeguards related documentation” will take place. The Belize 2016–2020 CES included TA interventions to address environmental safeguard system requirements through improved compliance monitoring, enforcement and reporting systems. However, the eight other CES’ reviewed did not provide for capacity-building related to environmental and social safeguards, which is not unusual.

The evaluation noted several factors that affect the capacity of BMCs to fulfil their ESRP commitments effectively. These include:

- Varying levels of expertise (as mentioned below, some countries have more environmental expertise while others appear to be more focused on the social aspects of the ESIA and ESMPs).
- The number of people available to ensure the ESRP commitments, particularly monitoring of ESMPs, are duly fulfilled (particularly smaller islands with stretched human resources, a perennial challenge in the region; this results in national authorities having to lean heavily on consultants or CDB for technical support; the case is somewhat different in SVG as two safeguard specialists within the Ministry of Finance will review every project and safeguard-related activity and make recommendations).
- The investment of time and resources made in the design and planning stage versus the monitoring stage.
- The differing levels of capacity and prioritisation amongst supervision consultants (while the evaluation fully recognises that supervision consultants are considered based on their ability to meet the criteria stipulated for a project’s ESMP, the evaluation field visits showed varying levels of attention and interest to different components of the ESMP).

Unsurprisingly, projects are more focused and have fewer capacity challenges when they include an environmental safeguards specialist or a gender and social inclusion specialist as part of their project team. Including a CLO also provides important support for stakeholder engagement, particularly when combined with a social and gender specialist and an environmental officer (although some teams see this as a duplication of roles). However, not all projects or BMCs have the resources to implement the required conditionalities; in some cases, they rely on TA resources from CDB.

Some of the capacity challenges may relate to the balance between environmental and social safeguards. While the latter has been a growing area of practice over the past decade, with clear support from, there are still barriers to focusing on some of the social aspects, especially as they relate to GE, such as the low supply of gender and social inclusion consultants in the region, as well as requirements from national legislation. Such legislation may only require, for example, an Environmental Impact Assessment (EIA). In contrast, CDB’s ESRP requires an ESIA, posing a challenge between respecting sovereign laws and continuing to advocate for the added value of the additional “s” for social. This is one example of a time when CDB would need to assist countries in building up national capacity (government, consultants, local expertise) to “undertake ESIA and build up sufficient in-country expertise and a ‘market’ for undertaking ESIA”. (Interview, CDB).

Contractors and those workers that a contractor hires vary in capacity. While CDB officers maintain that contractors must meet environmental and social requirements before being hired, other CDB officers and

project or executing agency personnel admit this is not always the case. For example, interviewees have noted:

“We’ll get a blank look from them when an ESRP is discussed” (Interviewee, CDB)

“They will only pay attention to those aspects that are in ‘red alert’” (Interview, SVG)

“They don’t believe that sexual misconduct has anything to do with their project so they simply won’t pay attention to it (Interview, SVG).

An interviewee in Guyana noted:

“The clearest gap is with contractors. A cultural shift is still underway, so there is sometimes little understanding as to why ESRP and safeguards are required, or how to apply them. Contractors often see the measures as a burden, especially if mitigation activities will slow down the project timeline”. (Interview, Guyana).

According to interviewees in Guyana and SVG, contractors are not consistently provided with any training on ESRP requirements, although responsibilities for managing environmental issues, including environmental monitoring, and reporting, are included in project appraisal documents. For example, from the Sea and River Defences Resilience Project in Guyana,

“The engineering consultants responsible for supervising the works will monitor the contractors’ environmental performance and report the findings in their periodic progress reports for submission to the Bank.⁸ It is expected that the EPA will periodically monitor the contractor’s compliance with the ESMP. The Socio-Environment Officer (SEO) will be responsible for community liaison and environmental monitoring of the Project on behalf of Work Services Group. SEO will report to PC on matters relevant to the Project”.

BMCs view contractors as generally diligent in implementing mechanisms around operational health and safety.

The 2021 DFI Evaluation found that the inclusion of conditions to strengthen and monitor social and environmental safeguards in the loan agreement is not always followed up in practice:

“DFIs interviewed have reported that they often lack capacity to: (i) oversee sub-borrower adherence to agreed guidelines, and/or (ii) procure expert technical support services locally – where that capacity does not exist within the DFI itself. The evaluators found that neither the Grenada nor the Saint Lucia DFIs have specific technical support staff to oversee adherence by sub-borrowers despite having had approved Environmental and Social Screening Policies in place for more than five years”.

The same evaluation also found that there were not enough CDB staff to provide support to capacity-strengthening, including persons for follow-up and supervision to assess DAIDB’s adherence to recommended practices on mainstreaming environment risk assessment into its credit review process.

⁸ Please note that the evaluation team did not have access to these reports.

2.2.8 Is there an appropriate balance and effort between environmental and social aspects?

CDB treats the environmental and social aspects of the ESRP with equal importance, providing support from both SSD and ESU to every Bank project to screen for risks and strategies for each of the PRs (which are an equal mix of the environmental and social aspects). Initial screening by the SSD/ESU on the eight PRs informs the project risk categorisation and the nature of the environmental and social assessment to be undertaken during the project feasibility studies and will inform an ESMP and associated sub-plans for environmental and social risk mitigation. ESRP requirements are cascaded into the bid and contract documents, and contractors are required to indicate methods for addressing the E&S requirements, including costs. Prequalification requires contractors to demonstrate that they meet both the environmental and social criteria.

The balance between environmental and social aspects may be skewed to one or the other in different countries (and indeed down to the individual tasked with implementing or managing the ESIA and ESMP). For example, Belize counts on stronger technical (including legal) expertise, including consultants, concerning the environment and has made significant strides to improve environmental sustainability, including, among other things, updating its legislation and regulations concerning assessment of environmental risks), whereas CDB had to facilitate training on GE, social engagement and human trafficking, “and we still had challenges getting this information relayed to the contractor...a social or gender expert gets involved with the EIA but they are not highly trained” (interview, Belize). Conversely, in SVG, there is a two-person (both female) team within the Ministry of Finance that deals exclusively with social and environmental safeguards (one person for each), and whose mandate it is to review all projects for potential risks (not only those related to CDB loans), and provide feedback and follow-up on ESIA and ESMPs projects with a significant PR 7 component (Land Acquisition and Resettlement). For example, in the Port Modernisation Project in SVG, the necessary efforts have been made to ensure that this crucial social component has been undertaken in a carefully considered way with high participation of those affected populations (although the driver to ensure that the project has done its due diligence on this PR is equally driven by avoiding any bad press than it is for sustained livelihood improvement of affected persons).

Regarding GESI issues (the concern of PRs 5–8), the “seeds” still need to grow uniformly across the region. Moreover, applying gender analyses and Gender Action Plans to projects, as well as the communication and training by the CDB’s gender focal points and others in the SSD around GE, have all contributed to the elevation of the importance and investment in GE within BMCs. According to one SVG official:

“[The] CDB is known for its focus on gender equality ... we know that it is something we cannot leave out and we understand its importance” (Interview, Ministry of Finance, SVG).

For example, at the time of writing, a GESI expert had recently joined the Port Modernisation Project team in SVG to support the Community Liaison Officer (CLO). Part of the expert’s work will be to develop a Maritime Administration Policy on the GESI issue (the precise details of what this will entail were not disclosed during the evaluation).

While the importance of GE continues to make a mark, as noted in the overall findings around gender in the ESRP, recognising and addressing the complexity and diversity of social issues (labour, community health, indigenous rights, gender-based violence) and further defining vulnerable populations (ethnicity, disability,

people affected by HIV, LGBTQI+ populations) still requires a deeper level of effort by BMCs and particularly engineering firms in order to analyse risks and provide the relevant expertise to support ESMPs. As one SVG official noted:

“The support from CDB is greatly appreciated, but we also need to grow [this expertise] in-house” (Interview, Ministry of Urban Development, SVG).

Finally, PR8 is one which, according to site visits, is done well, particularly by construction firms. Of note is the willingness and investment of one school construction project in SVG to continually find safety solutions that were unforeseen at the ESIA stage (which emphasises the need to understand the nuanced and diverse populations within affected populations, as well as the ability to adapt and bring a level of flexibility to project construction). Girls from the school in question continued to evade safety barriers so that they could continue to use their netball court to practice for an upcoming tournament (the school they have been placed at during construction does not have a netball court). The project is seeking solutions to provide an alternative practice area for the girls to keep the construction area safe, as barriers and signage alone are not working.

2.3 EQC: What have been the results of CDB’s ESRP?

Before considering the results that have been delivered as a consequence of the ESRP’s application, it is essential first to assess the extent to which the ESRP is fulfilling its core function, namely the prevention, management and mitigation of environmental and social risks and negative impacts.

2.3.1 To what extent have CDB’s ESRP helped prevent, manage and mitigate environmental and social project impacts?

A central benefit identified by most stakeholders was the systematic, detailed risk analysis process that the ESRP afforded. There were mixed views as to how *proportionate* the ESRP requirements were. Some stakeholders felt that the ESRP was disproportionate in relation to the projects implemented (e.g., covering too broad a number of areas), while others felt that the procedures did not go far enough (e.g., in terms of disability access or compensation for more peripheral actors). Regardless of stakeholders’ views around proportionality, the ESRP was almost universally viewed as thorough and capable of identifying risks and possible negative impacts that would not otherwise have been identified. For example, in Belize, the ESRP process resulted in the development of wildlife corridors as an additional component of the coastal roads project. The *Evaluation of Energy Sector Policy and Strategy Evaluation* (2022) found that in Grenada, a stakeholder conference during the ESIA process uncovered a previously ‘missed’ environmental risk within a geothermal project, which in turn triggered project design revisions.⁹

In some instances, ESRP processes were seen to strengthen *existing* national requirements and processes. For example, in Guyana, the ESRP required consultations with local communities during the development of a

⁹ The evaluation did not state what the identified environmental risk was.

skills project. While these local community consultations were already a national requirement within Guyana, the ESRP's clearer structure and direction were seen to add value to the process. To paraphrase one interviewee: "we were consulting with local populations anyway, but the ESRP helped us to be more systematic, and we learned a lot from the people in the region". Similarly, during the port redevelopment project in Saint Vincent and the Grenadines, the ESRP strengthened the government's existing approach to community resettlement, with CDB including resources (i.e., consultants, including a GESI consultant) to deepen the government's efforts. There are also several examples of CDB engaging CLOs in projects.

Considering again the ESRP's function of preventing, managing and mitigating risk, CDB staff often made the point that there have been no significant negative environmental or social impacts across CDB projects since the ESRP's adoption. Of course, it could be that no adverse outcomes would have arisen even if the ESRP was not in place and that CDB's broader design processes were already sufficiently robust to prevent detrimental effects. While the absence of evidence here prevents a definitive conclusion, CDB staff generally felt that the ESRP *had* improved risk management and *had* helped to identify and mitigate potential difficulties.

2.3.2 To what extent have CDB's ESRP systems and operations helped strengthen BMCs' capacity to manage and mitigate social and environmental impacts?

Across all reviewed countries and projects, there was consistent evidence that the application of the ESRP had resulted in more robust implementation of safeguards. Simply by virtue of having to adhere to the ESRP, countries and projects necessarily had to systematically assess risk, establish necessary safeguards, and then monitor the implementation of those safeguards. Stakeholders within BMCs generally felt that participating in that process had inherently improved national capacity – and certainly knowledge – around environmental and social risk management. As noted above, even countries with safeguarding processes in place still benefited from the ESRP, which was sometimes seen as providing a stronger, more systematic framework than existing national procedures.

Many interviewees — both within CDB and BMCs — pointed out that regionally available capacity for environmental assessment and safeguarding is considerably more developed than for social safeguarding. There is a reasonably broad pool of companies and individual consultants based in the Caribbean that can support the environmental aspects of the ESRP process, but the equivalent resource base for social aspects is not as strong. This disparity also seemed to be reflected by BMCs' government-level capacities: governments generally had dedicated institutional resources that were well experienced at commissioning, overseeing, and even directly undertaking the requisite environmental assessments and checks. However, examples of equivalent government-level resources for *social* analysis and safeguarding were not as evident across BMCs.

While there was consistent evidence of robust safeguard implementation and strengthened *government* capacity, it was not clear that the ESRP has substantially influenced the day-to-day practice of service providers, the private sector or other non-government actors. For example, construction contractors interviewed during the evaluation were clear that they were only adhering to ESRP-related requirements because they were contractually obliged to. Those contractors are not applying — and will not apply — the

same processes or safeguards in other (i.e., non-CDB-supported) projects. Unless there is a financial or regulatory incentive, they will only deliver what they are contractually or legally required to do and no more.

2.3.3 How have the ESRP contributed to environmental and social outcomes?

The primary motivation for the ESRP is not delivering environmental and social results per se. Rather, the ESRP is a mechanism for preventing, managing and mitigating environmental and social risks and negative impacts. At the same time, the ESRP's application *can* plausibly deliver positive environmental and social results, and there is evidence that such positive results can be attributed to the ESRP.

Against that background, it is vital to distinguish between any given project's *overall* social and environmental results (which may have been delivered regardless of the ESRP) and results that were delivered *as a direct consequence* of the ESRP's application. For example, a forestry project may have delivered improved biodiversity by establishing a conservation zone, but that result was *not* due to the application of the ESRP. Rather, it was the core rationale for delivering the project in the first place. However, the same project may also have delivered new income streams for communities in the conservation zone, with this result only arising because the ESRP and its associated consultation processes identified a lack of income streams as a key project risk. So, in this example, the former environmental result (improved biodiversity) was *not* a consequence of the ESRP, but the latter socio-economic result (income streams for communities) *was* attributable to the ESRP.

With that distinction in mind, a number of results *attributable* to the ESRP were identified during the evaluation (i.e., these results would *not* have been delivered without the ESRP and its processes):

- New income generation opportunities for businesses displaced by the Saint Lucia Millennium Highway and West Coast Road Reconstruction Project were established, including: (i) the construction of a food court for vendors; (ii) social studies conducted for education projects in Guyana led to plans to construct a nursery to allow mothers to participate in the projects; and (iii) the SVG Port Modernisation Project compensated for the loss of business, provided vulnerability allowance, and gave local communities opportunities to input into construction of new housing.
- Wildlife protection measures were implemented in multiple projects. For example, nesting ospreys were protected in the Seventh Power Project in Belize, a seawall constructed in Dominica was revised to allow for crab migration, the Ambergris Caye Project in Belize reduced pollution in a barrier reef with ongoing monitoring of sewage, pollution and water quality designed into process, and protection was established for a dove sanctuary in the Grenada Solid Waste Management Project.
- The government of SVG has developed and adopted a gender maritime policy arising as a direct result of the government's experience with the ESRP. It has also set up a steering committee to facilitate stakeholder engagement for a bus terminal project following successful port resettlements.
- Environmental measures, including flood resilience, improved waste management, and dust suppression, were applied in numerous construction projects across multiple countries. For example, in the Lively Farm Road Construction in SVG, community input led to the re-routing of road drainage as villagers knew the water flows, revegetation took place in the SVG geothermal project, a diesel

generator was decommissioned and removed as part of the Seventh Power Project in Belize and a solar plant was included as part of the reverse osmosis plant in San Pedro in Belize.

While the above examples illustrate the type of discrete environmental and social results that the ESRP can help deliver, many stakeholders felt that the clearest, most positive results arose through the *process* of applying the ESRP. The ESRP was seen as providing a clear structure for analysing potential risks and problems and – crucially – for defining risk mitigation measures, including tangible, budgeted actions. As noted above, this systematic approach *does* identify issues that would not otherwise have been identified, *does* support the formulation of tangible responses to those issues, and builds capacity, awareness, and appreciation for the importance of safeguards. One interviewee concluded that:

“The main ESRP ‘result’ is not necessarily a product, it’s the strength of the process. If we just get it right from the start, even if there are then uphill battles, there is usually a gradual realisation around the importance of E&S considerations in project design and delivery. And that realisation is definitely linked to ESRP”. (Interview, External Stakeholder Guyana)

2.4 EQD: How effectively has the ESU/SSD supported CDB’s ESRP?

2.4.1 To what extent have ESU/SSD operations and related management helped address concerns related to the application of CDB’s ESRP?

In terms of responsibilities, staff from the ESU and SSD are assigned to screen for environmental and social risks and monitor environmental and social safeguards. Environmental officers lead the implementation of the ESSM with inputs from social analysts. ESU/SSD staff also participate in weekly supervision meetings, virtual supervision meetings and country visits. Although it was noted that the environmental and social specialists are now working in a more integrated way, interviewees still highlighted that it can be challenging to integrate the environmental and social components of the ESRP, given that it is often separate specialists working on these elements.

As mentioned in section 2.2, despite the human resources for ESRP having grown with the expansion of the ESU and SSD, project officers and social/environmental analysts remain stretched, given the size of the units and the demands on the team. Specialists were not always available to implement or supervise the ESRP. This has led to issues such as in Guyana, where tensions arose due to a lack of country visits, which the BMC felt slowed progress and reduced CDB’s contextual understanding in applying the ESRP. The issue was quickly rectified when ESU/SSD personnel visited the sites. There is also an inherent tension in applying the ESRP. While BMCs tended to understand the need for the ESRP, the emphasis often remained on approving projects quickly, which can make it difficult to ensure compliance with the entire ESRP. Therefore, the ESU/SSD and CDB project officers must contend with this and ensure that the value of the process and the potential outcomes are fully understood.

Several interviewees raised a question about a potential conflict of interest vis-à-vis the ESU/SSD role. The environmental and social analysts both contribute to project development and the appraisal of safeguards. Consequently, they must “wear two hats”, contributing to project design while preserving their autonomy to effectively challenge the project team regarding social or environmental risks. Nevertheless, the majority of interviewees believed that the analysts effectively manage this dual role, with no instances reported of problems occurring as a result. However, several interviewees floated the idea of establishing a dedicated ESRP/safeguards unit, as exists in the World Bank, which could potentially raise the ESRP’s profile (particularly within BMCs). Others made the case that increased internal awareness/sensitisation sessions, and capacity-building be required as part of HR onboarding for new CDB staff.

2.4.2 To what extent have ESU/SSD operations and related management fostered learning and improvement in implementing CDB’s ESRP?

Although training and materials are available for CDB staff and BMCs, including access to courses from other MDBs, there was a strong consensus that further training and guidance are required for full application in development practice. This is partly due to the evolving practice, as well as the need for updates and familiarisation due to staff turnover, changes in standards, and changes in governments. Areas specifically identified as needing additional training and guidance encompassed environmental and social risk analysis, understanding which elements of the ESRP process are mandatory (and under which circumstances), and sector-specific applications (such as transport infrastructure or the private sector), ensuring they are proportionate to the project's scope. It should be noted, however, that ESU/SSD expertise is well regarded and where training has been provided, it has benefited both CDB staff and BMCs/contractors.

2.5 Cross-Cutting Issues

2.5.1 Gender

Gender equality is a strategic pillar of CDB. The Bank and its officers recognise GE actions as essential not only as a driver of sustainable development but also for protecting vulnerable groups and achieving social safeguard objectives. GE has been a cross-cutting issue over the last two CDB strategic plans. The previous (2016–2019) and current (2020–2024) Strategic Plans define proactive action (promoting GE in all the Bank’s development interventions) and supporting the ESRP in preventative action (safeguards to prevent or mitigate the adverse impacts resulting from the Bank’s interventions). A 2018 Evaluation of the GEPOS revealed both constructive practices and ongoing challenges associated with the Bank’s efforts towards mainstreaming gender-responsive actions, including those related to social impact analysis and mitigation strategies. The ESRP relies on the GEPOS to identify and analyse gender inequalities that limit the abilities of PAPs to participate in and benefit from project-driven opportunities, as well as to resist, cope with, and recover from the adverse impacts that projects may generate.

There is no standalone standard on GE in the ESRP. However, its critical role is mentioned throughout the ESRP document. It states that GEPOS plays a role in committing to the reduction of gender inequality by

“[S]creening and assessing gender impacts in all [Bank] operations, and to ensure that findings from these assessments are incorporated in the design of all its interventions such that they reduce any gender specific and disproportionate adverse gender impact and promote improved gender equality”. (5.07, ESRP).

Gender is also acknowledged in the brief section around consultation and participation, and is mentioned in the following PRs: **Directly Affected Communities** (“Adversely affected groups should be engaged, in an inclusive and gender-responsive manner, about project impacts, and have a voice in determining mitigation measures and project benefits”); **Vulnerable Groups** (“Where such groups may be present, specific measures should be taken to:... involve them in culturally appropriate gender-inclusive and responsive ways in assessing impacts and proposing mitigation measures”); **Land Acquisition and Resettlement** (“Provisions should be made for culturally appropriate consultations (including gender), participation and grievance dispute redress mechanisms”); and **Community Worker Health and Safety** (“ESIA should also give attention to specific risks for women’s health and safety, hazardous materials, traffic and road safety including safety from sexual and gender-based violence” and “Employment practices should be, at a minimum, consistent with the laws of the country including, but not limited to, the principle of non-discrimination on the grounds of sex, as well as measures to prevent harassment, intimidation, and/or exploitation, especially in regard to women”).

The GEPOS recognises the importance of intersectionality and how gender inequalities can intersect with other inequalities such as socio-economic, ethnic, racial, disability and others, creating barriers to accessing project benefits. The ESRP has the potential to shed light on this through its PR on Vulnerable Groups. Of these, Indigenous Peoples have a slightly more descriptive section (albeit a small one, which does not include practical guidance) than others (children, elderly, and people with disabilities). LGBTQI+ populations are not recognised in the ESRP and are not identified as a vulnerable group.

GBV is cited in the ESRP in the social and environmental categorisation process as grounds for non-finance or for Category A allocation (“Likely to intensify discriminatory practices particularly against women, including gender-based violence”), as well as part of the Community Worker Health and Safety PR (“ESIA should also give attention to specific risks for women’s health and safety, hazardous materials, traffic and road safety, including safety from sexual and gender-based violence”). The 2019 GEPOS includes eliminating GBV for all (a leading indicator of gender inequality, particularly in times of hardship and crisis, with persisting threats that affect women and girls disproportionately) as one of its five action pillars. Further to this, its action pillar around equitable access to infrastructure services for all exemplifies this by stating the integration of gender-related safeguards such as a code of conduct for workers or sensitisation on GBV and sexual exploitation, abuse and harassment into infrastructure projects. Moreover, under action Pillar 5 (resilience for all), exemplary actions include increasing preventative and curative measures to combat any form of violence after disasters (particularly for persons in shelters).

The 2019 GEPOS provides a solid base for incorporating GE elements throughout the ESRP. GEPOS’ Guiding Principles “promote the inclusion of GE in all spheres of the Bank’s corporate and operational domains, reaching for synergies between the gender planning processes and the broader organisational architecture” and are a good touchstone for a future iteration of the ESRP. Particularly relevant to the social and gender aspects of the ESRP is the second principle around intersectionality, participatory and inclusive

perspectives and approaches, which “recognise that social groupings (including women, men, boys, girls, persons with abilities, ethnicity, persons with varied sexual orientation and the elderly) are not homogenous; and ensures a comprehensive understanding of the multiple factors that determine social and economic outcomes”.

While the ESRP, in conjunction with the GEPOS, creates a framework in which borrowers can assess gender equality-related risks, both are missing a precise framework, action plan, strategy and/or an explicit definition of SEA that ensures that it will be adequately addressed in all of CDB’s operations. While the PR on Community Worker Health and Safety states that “the ESIA should also give attention to specific risks for women’s health and safety, hazardous materials, traffic and road safety including safety from sexual and gender-based violence”, there is no guidance or indication of support within the ESRP for the continuous advancement of international standards to prevent SEA, both internally and in the Bank’s operations and finance areas. The ESRP itself does not specify any requirements to identify and address gender-based violence or sexual exploitation or to put in place specific measures to prevent and address these risks.

Currently, CDB is in the process of developing a revised Code of Conduct that is expected to incorporate SEA. The Office of Integrity, Compliance and Accountability (ICA) does not use a single document for prevention training and investigation. They tackle it from multiple angles, which ICA can do because they have both an ethics function (which handles sexual harassment) and an accountability function (which handles SEA) in the same ICA office. They use multiple sources, including CDB policies, procedures, code, case reports, investigative best practices, and manuals from other IFI bodies, of which ICA is a member like the Conference of International Investigators (CII), Ethics Network of Multilateral Organisations (ENMO) and partner organisations like the World Bank, the IDB and the United Nations. They also leverage relationships with other offices. For instance, they have twice used senior World Bank staff to undertake annual SEA training sessions for all staff in 2018 and 2021.

There is no code of conduct for borrowers to identify and address the potential for SEA and sexual harassment in projects, although screening for GBV risks is apparently part of the early screening (ESSM) undertaken by social analysts and in environmental and social impact assessments (of the three ESSMs reviewed, only one included GBV). The 2019 GEPOS, however, has included reinforcement around the need to safeguard against GBV (although not around sexual exploitation and abuse). GBV and SEA are not included in the glossary of terms of the ESRP. Concerning sexual misconduct, one potential gap in current policies relates to the conduct of staff working for companies contracted by CDB and among executing agencies. In principle, these organisations should have dedicated sexual misconduct policies. However, without its own SEA policy, the Bank’s capacity to respond to such issues is constrained. Although revisions of available reports suggested that contractors should have such policies, there was no indication of measures to guarantee their implementation.

CDB is well-known regionally for its prioritisation of GE and for the strong technical officers within the SSD dedicated to identifying, analysing and supporting GE. CDB’s gender officers have built internal capacity through training, coaching, and accompaniment. Moreover, project officers, particularly engineers, are confident in understanding and explaining why the ESRP and mainstreaming gender and social issues are important. The ESRP includes an environmental screening process, during which gender and social sector specialists assess projects through a specific lens to ensure that the ESIA incorporates relevant information from social and gender analyses. This includes baseline data on gender conditions pertinent to project

decision-making, an examination of social and gender impacts and risks, and identification of opportunities to enhance environmental and gender benefits.

The Environmental Management Capacity of the Borrower Assessment included in the ESRP is supposed to be conducted during project appraisal and ostensibly focuses on evaluating the environmental management capabilities. However, the assessment's scope also extends to evaluating social management capacities, as indicated by its content. For example, it asks, “How are social issues of relevance, such as poverty and gender equality and access in special components such as student loans and mortgage schemes assessed?” Despite having the potential to be a concrete tool to assess BMC capacity, the evaluation did not obtain any evidence that these capacity assessments were carried out.

Although the CDB possesses a robust and expanding mandate and technical capacity concerning GE, the capability for GE within BMCs is uneven. This inconsistency is further pronounced among contractors and supervisory consultants responsible for executing projects. While some countries have highly skilled ministerial staff to deal with the social and gender equality aspects of CDB projects, the perennial issue of understaffing means that not all projects get the same attention. This, of course, poses potential problems for applying GE in the different relevant elements of the ESRP. In particular, there are varying levels of focus on SEA and GBV, with one project manager citing that “because there are no foreign workers, we do not need to worry about sexual exploitation or abuse or violence” (Interview, SVG), and other project staff member claiming “this isn’t an issue we need to deal with because it doesn’t happen here” (Interview, project staff, SVG). However, in projects where this has received greater attention (like the Belize Sixth Road Project), interviewees noted the improved practice that the focus has generated.

2.5.2 Climate Change

While the ESRP does not include a dedicated statement on climate change, *analysis* of climate risk is part of the broader ESRP process and is well factored in through exercises such as climate risk screening and Climate Risk and Vulnerability Assessments. Moreover, there was a general consensus among interviewees (both within CDB and within BMCs) that climate change was adequately addressed and appropriately emphasised through ESRP-related processes and, indeed, through CDB’s broader project development processes.

Additionally, several interviewees noted that – independent of any CDB requirements – most BMCs now routinely demand some form of climate analysis (often rigorous) during the development of any projects of national significance. This broader trend provides another “line of defence” against climate-related risks for and, indeed, other investors.

CDB and the ESRP’s approach to climate change is generally in line with the practice of other MDBs in that “climate change” is not usually a standalone PR. A notable exception here is IFAD, which categorises projects according to climate risk, undertaking a relatively detailed analysis to support those categorisations.

3 Conclusions

This evaluation has considered the suitability and relevance of the ESRP, how they have been applied and what results they have achieved in the period since the current version was introduced in 2014. It has also considered how well the application of the procedures has been supported by CDB's environmental and social specialists.

Looking across the whole evaluation, we may draw five main conclusions (with the evaluation questions to which they relate shown in brackets):

1. **Significant evolution in practice (EQ A and B).** Over the last ten years, there has been a clear evolution in the prominence and centrality of the environmental and social review procedures in CDB's work. The importance of the ESRP has been brought into much sharper focus, and staff demonstrate increasing awareness of the procedures and why they matter. Even non-specialists are able to speak knowledgeably about the need for attention on environmental and social issues and how they should be considered.

This trend reflects greater global awareness and importance of the environmental and social issues within the context of BMCs' development priorities and the international commitments to the SDGs. BMCs also recognise that these issues and the standards are important – they may see the procedures as time-consuming and demanding, but they have nonetheless taken ownership of them and understand why they matter. One of the drivers pushing for greater attention to environmental and social issues has been the pressures and scrutiny from donors to CDB on the one hand and from pressure groups within the BMCs on the other. Another facet of this evolution has been a shift in thinking towards an increasingly holistic approach which goes beyond the identification and management of risks to consider the realisation of benefits, although this is a work in progress.

2. **Guidelines need to be updated (EQA and EQB).** While the application of the ESRP in practice has evolved considerably, CDB's guidelines and tools have not kept pace with these changes and now need attention to bring them up to date. Having considered practice in other MDBs, this evaluation has identified several areas (e.g., SEA, climate change) with gaps and a need for more detail and specificity in the guidance. Currently, BMCs tend to rely more heavily on the guidance of other MDBs, such as the World Bank and the IDB. Further guidance should be visually straightforward to follow for the more general categorisation, and more detailed guidelines and easy-to-fill (possibly digitally) templates on specific scenarios. The recommendations below start with specific suggestions on areas that could usefully be updated.
3. **A tailored approach would be useful and play to CDB's comparative advantage (EQA and EQB).** Compared with the other MDBs, CDB has a significant comparative advantage in being a smaller-sized, agile bank with strong regional knowledge. The evaluation also noted that a rigid application of the ESRP has significant costs for the BMCs. Taken together, these points suggest that CDB could usefully offer a more tailored and flexible approach to applying the ESRP based on knowledge of the country context. In some countries with more robust capacity (e.g., Belize,

Jamaica), this also offers the possibility of using country systems, informed by a diagnostic of those systems to assess their readiness. It is noted that the process of mapping country legislation is important and can be useful leverage on BMCs.

4. **Post-appraisal stage implementation gap (EQ B and EQ D):** The application of the ESRP during the project identification and appraisal stage was found to be comparatively stronger than in the project implementation, supervision, enforcement and monitoring of results. There are weaknesses in the capacity of the CDB and its BMCs to monitor compliance with ESMPs, and there is a need for stronger incentives for contractors to follow through on the requirements.
5. **Results are weakly evidenced (EQ C and EQ D):** The evaluation has considered what results are supported by the ESRP, given the intent of the ESRP to go beyond risk management and mitigation (“do no harm”) to help underpin positive benefits and impact (“do good”). This area turned out to be the least well evidenced. The projects in the sample had been initiated since 2014, but given the long lead times of CDB projects, few have been completed long enough for projection completion reports to be available. The evaluation concludes that the ESRP has strengthened the processes that underpin results (i.e., there have been tangible steps to manage and mitigate risks and set out plans to deliver positive environmental and social results). This is an important condition for results to be realised; it is backed up by examples from the field visits of results starting to emerge.

4 Recommendations

The evaluation makes five recommendations:

R1. In updating the ESRP, CDB should consider the following specific aspects of the practice of the other MDBs, which may provide opportunities for CDB to learn and update its own approach. This process of learning should take account of the Caribbean regional context and what will work locally rather than apply learning uncritically from practice in other regions.

- Learning from IFAD's approach, consider having a separate classification for **climate change**. This classification could be embedded as another step during the initial screening undertaken for all potential investments.
- Learning from other MDBs, consider having a separate performance requirement for **financial intermediaries**, depending on whether FIs already have some sort of environmental/social screening in their own procedures.
- Learning from IDB, consider how adverse impacts on **critical habitats** are addressed. In particular, clarify whether providing an offset to mitigate adverse impacts on critical habitats is an acceptable mitigation strategy or not.
- Learning from the World Bank, consider whether to treat **consultation and information dissemination and disclosure with stakeholders** as a core safeguard in order for it to get more priority and attention. There may be scope to look at BNTF as a good example of how CDB is already doing this.
- Learning from IDB, consider more specific guidance to identify risks and potential adverse impacts of a project on **differentiated and intersectional vulnerable populations** (i.e., Indigenous Peoples). In particular, more specific guidance on Indigenous Peoples should be included in the next iteration of the ESRP, based on lessons learned from CDB projects that dealt with Indigenous Peoples.

R2. Ensure that consideration of the risks around **sexual exploitation and abuse (SEA)** is positioned correctly and given due attention. This may include clear definitions of SEA and CDB's expectations of borrowers around SEA (if they required borrowers to have their own code of conduct); guidance on risk assessment of SEA; loan agreement terms and conditions, e.g., Sexual Misconduct clause, reporting and contractual requirements of borrowers.

R3. Consider clarifying the role that different **gender impact assessments (e.g., CDB's Gender Marker Analysis)** have in the overall ESRP process so that there is a clearer link between the activities of gender mainstreaming and the ESRP.

R4. CDB's approach to using the **environmental and social frameworks of BMCs** should be clarified as follows:

- Make explicit reference in CDB's procedures to what is currently acceptable and expected in terms of using the BMC's framework. Doing so would crystallise current practice. CDB should also be clear with BMCs on the costs of not addressing E&S risks.
- In the medium term, as capacity enhances, CDB should consider a more radical approach that focuses on the quality of the BMC's safeguards systems rather than making a project-by-project assessment.

R5. Design a comprehensive, user-friendly, publicly available, well-designed **ESRP communication package**, which would raise BMCs' awareness and start the process of responding to their requests for more capacity-strengthening. The communication package could include:

- Two-page brief of the ESRP including core guiding principles (proportionality, outcome orientation, transparency, "do better"); very brief explanations of key elements – what are the performance requirements that relate to environmental issues (protection of biodiversity, etc.) and social risks (worker protection, vulnerable communities); brief explanations of the cross-cutting themes plus stakeholder engagement and information disclosure.
- The revised ESRP.
- Flow diagram of the overall procedures/all of the steps, including links with other policies like Gender Equality Policy and Operational Strategy (GEPOS) and Youth Policy and Operational Strategy (YPOS).
- Revised tools and formats, with a user-friendly digital format and ensuring (for example) that both environmental and social aspects are equally well covered.
- Examples of Category A, B and C projects to help identify project categories and their criteria.
- Self-assessment capacity tool to determine the readiness of BMCs to carry out ESRP.
- Link to some simple training videos.
- Adaptation for different audiences where helpful for the CDRRF *Effective Community Engagement across the Project Management Lifestyle* as guidance for community engagement and meaningful public consultation.
- Rubric for quality of reports (ESIA, ESMP, supervision reports) for more systematic monitoring of project commitments around ESMP activities.
- Compilation of positive and negative experiences as case studies ("learning cases").
- Centralised ESRP document management in a central SharePoint system to allow ease of access.

ANNEX 1: Management response to the conclusions and recommendations of the Evaluation of the Environmental and Social Review Procedures

1. **BACKGROUND**

1.01 The Caribbean Development Bank's (CDB) Environmental and Social Review Procedures (ESRP) was prepared in 2014, evolving from prior frameworks including the Environmental Review Guidelines (1994) and the Guidelines for Social Analysis of Projects (2004). This marked the integration of environmental and social concerns into a comprehensive ESRP document for the first time. The 2014 version reflects shifts in development community paradigms, emphasising enhanced stakeholder dialogue, systematic impact assessments, and alignment with global development standards to bolster effectiveness in poverty reduction and sustainable development endeavors of Borrowing Member Countries (BMCs).

1.02 Outlined within the 2014 ESRP document are eight Performance Requirements (PRs) aimed at managing environmental and social risks in CDB operations. These PRs, aligned with international standards, seek to optimise decision-making, build client countries capacity, and ensure clarity in CDB's environmental and social risk management procedures. The Environmental Sustainability Unit (ESU) oversees ESRP revisions, operational policies, and staff training, with direct involvement in project teams and coordination of project appraisal and supervision alongside social analysts from the Social Sector Division (SSD).

1.03 The ESRP comprises two main components: mainstreaming environmental and social considerations and specific review requirements for the Bank's investment lending operations. These components are guided by PRs covering pollution prevention, critical habitats, cultural property, and community health and safety, land acquisition and resettlement, emphasising considerations for vulnerable groups and indigenous peoples, among others. While not explicitly outlined, climate change vulnerability assessments are integrated into the ESRP process, reflecting CDB's commitment to addressing emerging challenges in environmental and social sustainability.

1.04 The ESRP undergoes continuous review and updates, requiring approval by the Bank's Senior Management Group and notification to the Board of Directors. The implementation of the ESRP will form the foundation for assessing the Bank's environmental and social performance, with periodic independent reviews conducted at least every five years. The Evaluation is attached in Appendix 1.

2. SCOPE AND METHODOLOGY

2.01 The main aim of the evaluation is to provide credible and reliable information on CDB's ESRP performance during the 2014–2022 period to enable lessons and recommendations to be drawn that may be used to inform a revised iteration of the procedures. The evaluation serves both accountability and learning purposes in determining how effectively the ESRP serves the intended purpose and identifying how the procedures can be updated and strengthened (if required). The evaluation sought to answer four overarching evaluation questions:

- (a) How well is CDB's ESRP suited to preventing, managing, and mitigating adverse environmental and social impacts?
- (b) How effectively have CDB's ESRP been applied?
- (c) What have been the results of CDB's ESRP?
- (d) How effectively have the ESU/SSD supported CDB's ESRP?

2.02 The evaluation used a mixed methods approach, drawing and triangulating findings from a review of 104 documents, 51 key informant interviews with 92 CDB staff and partners, and four country visits (Belize, Guyana, Saint Lucia, and Saint Vincent and the Grenadines). The approach included sampling 23 CDB projects approved after January 2014, including all Category A projects and 19 Category B projects in the sampled countries.

3. INTRODUCTORY COMMENTS

3.01 The review of the CDB's ESRP reveals several main findings. Firstly, there has been a notable progression over the past decade toward recognising the significance of environmental and social considerations in CDB's operations. Staff awareness and understanding of the ESRP have increased, driven by both internal initiatives and external pressures from donors and advocacy groups. This evolution encompasses a shift towards a more holistic approach that aims not only to manage risks but also to realise positive benefits, although this remains a work in progress. Secondly, while the application of the ESRP has advanced significantly, ongoing updates and improvements are necessary. The evaluation suggests the need for clearer and more detailed guidance, particularly in areas such as sexual exploitation and abuse (SEA) and climate change. Additionally, CDB's regional expertise positions it to offer a more tailored and flexible approach to ESRP implementation, considering the varying capacities and contexts of client countries. Furthermore, there is room for improvement in monitoring compliance during project implementation and supervision, along with incentivising contractors to adhere to environmental and social requirements. Lastly, while the ESRP aims to foster positive impacts beyond risk mitigation, evidence of such outcomes is limited due to the relatively recent initiation of projects and the lengthy project timelines. Nonetheless, there are indications of progress, signaling the importance of continued efforts to achieve tangible environmental and social results.

3.02 Management supports the independent ESRP Evaluation, acknowledging its valuable insights. It recognises the necessity of aligning with evolving perspectives within the development community regarding environmental and social sustainability and poverty reduction.

4. MANAGEMENT RESPONSE

4.01 Management is of the view that the Evaluation represents a fair assessment of the ESRP. Management accepts most of these recommendations or otherwise suggests alternative ways by which the required improvements can be made.

4.02 Specific comments relative to each recommendation in the Evaluation are set out below:

Recommendations	Management Comments / Responses (Accepted/ Accepted but Modified/Rejected)	Commitments / Actions	Responsibility Centre	Target Completion Date (Y/M/D)
<p>Recommendation 1. When updating ESRP, CDB should examine practices from other multilateral development banks that may offer insights. Specifically, CDB should explore:</p> <p>1a. The feasibility of implementing a separate climate change classification and whether it may be embedded within the screening processes.</p>	<p>Modified</p> <p>CDB is fully committed to assisting member countries in achieving disaster risk reduction and climate change resiliency objectives. This commitment is demonstrated through focused efforts on capacity enhancement, facilitating access to climate financing, and mitigating physical, environmental, social, and economic losses, particularly among vulnerable populations. The heightened vulnerability of member countries to climate change impacts and natural hazards underscores the urgency and importance of these initiatives.</p> <p>Management acknowledges the recommendation to explore the feasibility of integrating a separate climate change classification into screening processes. However, the Bank already applies a climate risk assessment rating to projects during the climate change screening process. Various project-specific factors are used by CDB to determine the appropriate risk classification, none, low, moderate, and high. Given the existing screening process to inform whether more in-depth climate vulnerability and risk assessment is required, the rationale for introducing a distinct classification specifically for climate change is unnecessary as it would not add value to the current process. CDB uses the World Bank Climate and Disaster Risk Screening Tool. However, the Bank will continue to explore practices from other MBDs that can help strengthen its climate and disaster risk screening and assessment approach.</p>	<p>No action required</p>	<p>ESU and SSD</p>	<p>N/A</p>
<p>1b. Addressing adverse impacts on critical habitats and clarifying the acceptability of mitigation strategies, such as offsets on critical habitats.</p>	<p>Accepted</p> <p>The recommendation to address adverse impacts on critical habitats and clarifying the acceptability of mitigation strategies, such as offsets on critical habitats, aligns with good practice and the ESRP. CDB's commitment to preserving</p>	<p>In the updated ESRP, the PR for Natural Habitats and</p>	<p>ESU</p>	<p>Q1 2025</p>

Recommendations	Management Comments / Responses (Accepted/ Accepted but Modified/Rejected)	Commitments / Actions	Responsibility Centre	Target Completion Date (Y/M/D)
	<p>biodiversity, conserving natural resources, and advocating for the sustainable utilisation of ecosystem services, and mitigating adverse effects on critical habitats is detailed in ESRP PRs for Natural Habitats and Biodiversity Conservation.</p> <p>However, management acknowledges that the concept of offsets is not explicitly addressed in the Bank's ESRP, despite CDB requesting clients to follow the mitigation hierarchy. In the updated ESRP, the PR for biodiversity will be further elaborated to encompass the viability of mitigation measures, including offsets for critical habitats.</p>	<p>Biodiversity Conservation will be elaborated to encompass the viability of mitigation measures, including offsets for critical habitats.</p>		
<p>1c. Considering consultation, information dissemination, and disclosure vis-à-vis stakeholders as performance requirements, drawing insights from the Basic Needs Trust Fund as a good internal practice.</p>	<p>Accepted</p> <p>The recommendation to consider consultation, information dissemination, and disclosure vis-à-vis stakeholders as a PR. Meaningful stakeholder engagement helps to identify needs and concerns, builds support and credibility, enhances project design, mitigates risks, ensures compliance and acceptance, and promotes transparency and accountability.</p> <p>Management accepts that though stakeholder engagement is currently integrated into the ESRP, it will be elaborated to be more strategic and impactful.</p>	<p>Stakeholder Engagement and Information disclosure will be included as a performance requirement within the updated ESRP.</p>	<p>ESU and SSD</p>	<p>Q1 2025</p>
<p>1d. Providing more specific guidance for identifying risks and potential adverse impacts on differentiated and intersectional vulnerable populations, including Indigenous Peoples, in future iterations of the ESRP.</p>	<p>Accepted but modified</p> <p>Management appreciates the recommendation to enhance guidance for identifying risks and potential adverse impacts on vulnerable populations, including Indigenous Peoples, in future versions of the ESRP.</p> <p>Presently, considerations for Indigenous Peoples are integrated into ESRP Vulnerable Groups Performance Requirement, offering brief guidance on their identification and the development of Indigenous Peoples Development Plans (IPDPs). However, practical application has highlighted</p>	<p>CDB will retain the existing PR for Vulnerable Groups. This PR will however be enhanced to include more specific guidance for identification for indigenous peoples, development of IPDPs, FPIC and GRMs.</p>	<p>SSD</p>	<p>Q1 2025</p>

Recommendations	Management Comments / Responses (Accepted/ Accepted but Modified/Rejected)	Commitments / Actions	Responsibility Centre	Target Completion Date (Y/M/D)
	the need for elaboration and specific guidance on aspects such as Free, Prior, and Informed Consent (FPIC), Grievance Redress Mechanism (GRM), and expertise requirements for IPDP preparation.			
Recommendation 2: Ensure adequate attention and positioning of risks related to sexual exploitation and abuse (SEA) within CDB's protocols. This involves defining SEA, setting CDB's expectations of BMCs, providing guidance on risk assessment, and incorporating appropriate clauses (e.g., Sexual Misconduct clause) within loan agreement terms and conditions.	<p>Accepted but modified.</p> <p>Management recognises the current coverage of Sexual Exploitation and Abuse (SEA) within certain areas of CDB, such as the Office of Integrity, Compliance, and Accountability (ICA), which aligns its definition with the UN Glossary on Sexual Exploitation and Abuse 2017.</p> <p>While acknowledging existing efforts, it is understood that the SEA risks need to be addressed comprehensively. This will involve revising the ESRP and developing accompanying guidance as necessary. Areas currently covering SEA will be expanded, enabling a thorough approach to prevention and response. Furthermore, gender-related risks, beyond SEA, will be incorporated into the updated ESRP.</p> <p>As the General provisions of loan agreements refer to compliance with the ESRP, there will be no change to the loan agreement and conditions. The change is therefore required within the ESRP.</p>	CDB will: Revise the ESRP to include a definition of SEA and integrate SEA considerations into performance standards.	SSD	Q1 2025
Recommendation 3: Clarify the role of gender impact assessment tools (e.g., CDB's Gender Marker Analysis) within the ESRP process to strengthen the link between gender mainstreaming activities and the ESRP.	<p>Accepted but modified</p> <p>The Gender Marker Tool is a quality-at-entry tool assessing the contribution of a project towards enhancing gender equality and is not design to assess risks. Gender Mainstreaming is not risk mitigation and goes beyond do no harm which would be a deepening of gender inequality. Gender mainstreaming aims at reducing gender inequality. In this sense only doing no harm would not result in a project being gender mainstreamed.</p>	Enhance the specificity of gender-related risks in the ESRP performance standards, and processes, as outlined in response to recommendation 2 above.	SSD	Q1 2025

Recommendations	Management Comments / Responses (Accepted/ Accepted but Modified/Rejected)	Commitments / Actions	Responsibility Centre	Target Completion Date (Y/M/D)
	It is, however, agreed as outlined in response to recommendation 2 above that gender-related risks need to be made more specific in the ESRP, performance standards.			
Recommendation 4:. Clarify CDB's approach to utilising the environmental and social frameworks of BMCs as follows: 4a. Define acceptable and expected practices of BMCs regarding framework utilisation.	Modified Management is aware that ESRP already supports the use of BMC's environmental and social systems in the preparation and implementation of capital/investment projects if these systems/frameworks address the risks and impacts of the project, and are materially consistent with the ESRP in achieving the project objectives. It is important to note that any decision by CDB to use all or parts of a BMC's environmental and social system/framework will not relieve CDB of any of its due diligence obligations established in the ESRP. This is the approach currently undertaken by Multilateral Development Banks (MDBs). Calculating cost implications would not be practical however, some general statements about 'disregarding' environmental and social risks could be included in the updated ESRP.	CDB will elaborate on the use of national systems in the updated ESRP consistent with the approaches of other MDBs.	ESU	Q1 2025
4b. Communicate the cost implications of disregarding environmental and social risks.		No action required.	N/A	N/A
4c. Consider adopting a progressive approach, prioritising the enhancement of BMCs' safeguards systems over project-by-project assessments. This can be implemented gradually, beginning with an assessment of BMCs' capacity, and focusing on initially low risk projects.	There is a consensus among MDBs to consider seeking a common approach to using country systems in the longer term. CDB is currently working with the World Bank and the Inter-American Development Bank on a pilot project to consider the readiness of country systems. The intention being to identify and address any material gaps in the short to medium term that will enable the long- term consideration of country systems for low-risk projects.	CDB will continue working with other MDBs on potential common approaches to use of country systems.	ESU/SSD	Q1 2025
4d. Explore accreditation for national institutions capable of overseeing environmental approvals.	Rejected CDB does not have a system to accredit national institutions. Accreditation is costly and ambitious, and not part of the ESRP.	No action required.	N/A	N/A

Recommendations	Management Comments / Responses (Accepted/ Accepted but Modified/Rejected)	Commitments / Actions	Responsibility Centre	Target Completion Date (Y/M/D)
<p>Recommendation 5: Develop a user-friendly communication package for the ESRP to address capacity-building needs and enhance understanding among stakeholders. Components may include briefs, flow diagrams, training materials and videos, and a centralised document management system (e.g., in a central SharePoint system to allow ease of access).</p>	<p>Accepted. Management is of the view that the recommendation to develop a user-friendly communication package for the ESRP is important. Simplifying the clients responsibilities could improve understanding for CDB's internal and external clients. Clear communication of the ESRP's requirements is essential for enabling compliance with environmental, social, and standards throughout project cycles. Understanding roles and responsibilities under the policy helps stakeholders adhere to its guidelines, reducing the risk of non-compliance and negative impacts on the environment and local communities. Establishing a centralised document management system, such as SharePoint, facilitates easy access to the ESRP and related materials, promoting transparency and accountability.</p>	<p>ESU and SSD will collaborate with the Bank's Corporate Communications Unit (CCU) and engage consultants as required to develop appropriate communication material aimed at enhancing capacity-building and fostering a deeper understanding of the ESRP among CDB's internal and external clients.</p>	<p>SSD/ESU/CCU</p>	<p>Q3 2025</p>

APPENDIX 1 DOCUMENT LIST

Document group	Document name
CDB HQ	ESPS Evaluation Final Report
	FINAL CDRRF Evaluation Report
	Final Report DFI Evaluation
	Synthesis report Managing for Sustainability
	BD88 20 Framework Paper Social Protection for Building Resilience
	Barbados CSPE redacted
	OECS Cluster Evaluation Volume I Evaluation Report
	Volume I TA Evaluation Report Public Sector (redacted)
	OIE Brief Gender Equality Policy and Operational Strategy
	BD20 20&Corr.1 Gender Equality Action Plan 2020 2024
	BD23 12 Add 2 Climate Resilience Strategy Board Version
	CDB Strategic Plan 2022 2024
	Environmental and Social Review Procedures
	GEPSOS 2019 FINAL
	Jamaica CSP 2017 2021
	St. Kitts and Nevis CSP 2017 2021
	Strategic Plan 2020 24
Externals	Background document: Scoping Green Climate Finance Environmental and Social Safeguards
	ADB safeguard policy statement June 2009
	AfDB's Integrated Safeguards System Policy Statement and Operations
	FESM 19 Sept 2022 to OED
	GCF Revised Environmental and Social Policy 2021
	IDB Environmental and Social Policy Framework 2021
	IFAD Social, Environmental and Climate Assessment Procedures 20
	IFAD Social, Environmental and Climate Assessment Procedures 20
	OED All staff meeting 19 Sep 2022
	World Bank Environmental and Social Framework
PBLs	BD51 08 Add 2 Saint Lucia Revision PBL
	BD58 16 Eight Water (Dennery North Water Supply Redevelopment
	Combined Second Growth PBL Grenada
	Philip Goldson Highway Upgrading Project Belize
	Second Growth PBL Grenada
Belize	ESSM Coastal Highway
	ESSM BZE 7th Power (Caye Caulker)
	BD 162 16 Eighth Consolidated LOC BZE
	BD121 18 Sixth Road (Coastal Highway Upgrading) Project Bel
	BD19 18 Add.1 Notification of Approval Belize Water
	BD26 15 ESEPII Belize
	BD51 14&Corr.1 Seventh Consolidated LOC Belize

Document group	Document name
	PCR 21 SFR OR BZE Road Safety Project FINAL
	Belize Coastal Road I ESIA Main Draft
	Seventh Power Project Belize ESIA
	Belize CES 2022 26 Board Final
	Belize Road Safety Project Add Loan
	Belize Water
	Covid 19 Emergency Response Support Belize Final
	Fifth Road Project Belize
	Second Road Safety Project Belize
	Seventh Power Project (Caye Caulker Submarine) Belize
	Sugarcane Farmers Resilience Belize
	Country Strategy Belize 2016 2020
Grenada	Grenada Solid Waste Management Project HydroPlan Final EIA Repo
	Solid Waste Management Grenada
	Grenada Country Engagement Strategy 2022 26 Final
	Grenada CES 2014 2018
	Grenada Education Enhancement Project ESIA Marmount School
	Grenada Education Enhancement Project ESMP Marlmooount School
	Grenada Solid Waste Management Project HydroPlan Final EIA Repo
Guyana	Beterverwagting PIC Draft ESMP
	ESMF HTI PROJECT FINAL CDB revised and updated 10th Oct
	ESSM Framework for Hospitality Institute Guyana FINAL 8 October
	Final Draft GSDEP Bartica ESMP
	Final Draft GSDEP Lot A North West ESMP
	GSDEP ESMP (FINAL) May 2019 Fellowship
	GSDEP ESMP (FINAL) May 2019 Hopetown
	LMHR Project ENVIRONMENT SOCIAL Screening Memo March 2020 Revised
	Nov 07, 2022 Linden to Mabura Hill ESIA Rev E
	Sea Defence ESIA
	BD159 16 Skills Development and Employability Project
	BD102 20 Hospitality and Tourism Training Institute Project Guy
	BD84 13 Sea and River Defences Resilience Project Guyana
	BD 110 20 Appraisal Linden Mabura Hill Road Upgrade Guyana
	Guyana 2017 2021
Montserrat	ESSM and ESPRC MSR Portrev 2017
	Montserrat Port Development Project Environmental and Social Impact Assessment
	BD 155 17 Add 1 Waiver Request Mont Port Project BOARD
	BD 155 17 Add 2 Notification of Approval by BOD Waiver Request Mont
	BD155 17 Montserrat Port Dev BOARD
Saint Lucia	St. Lucia CES 2020 2023
	St. Lucia CSP 2013 16

Document group	Document name
	BD6 20 Millennium Highway and West Coast Road Saint Lucia
	BD 57 15 Add 1 Seventh Water JCD Saint Lucia FINAL
	BD 119 16 St. Lucia EQuIP
	BD57 15 7thWaterJohnComptonDam
	BD58 16 Add.2notificationofBODapproval8thwaterstlucia
	BD58 16 8th Water Dennergy NEW
Saint Vincent and the Grenadines	SVG Country Engagement Strategy 2022 26
	BD47 17&Corr.1EnergyEfficiency Measures Solar PV Plant SVG
	Energy Efficiency Measures Solar PV Plant SVG
	PCR SVG Geothermal Drilling Project (part 2) signed
	Final Sandy Bay ESIA Baseline Assessment Report 25 Sep 2019
	Port Modernisation Project SVG Final ESIA
	BD 20 16 Add 1 Disaster Risk Reduction SVG
	BD3 22 Safety Nets for Vulnerable Populations Affected by Corona Virus
	BD20 16 Natural Disaster Management Corr.1
	BD50 14 RRL December2013 Trough Event SVG
	BD64 16&Corr1GeothermalDrillingProjectSt.Vincent
	BD64 16Add3 St.Vincent Geothermal Project Add Grant Notification
	BD75 16 SVG geothermal DFID
	BD105 19 Port Modernisation Project St Vincent and the Grenadines
	BD108 20&Corr.1 School Improvement Project St Vincent
	BD122 18Add1NotificationBODSandyBaySeaDefencesSt.Vincent
	BD122 20&Corr.1VINLECSolarPVPPProjectSt.Vincent
	BD130 18 Road Management and Rural Road Improvement EU SVG

APPENDIX 2 INTERVIEW LIST

INCEPTION INTERVIEWS			
HQ/Country	Key informant	Organisation	Position
HQ	Daniel Best	CDB	Director of Projects
	Diana Wilson Patrick	CDB	General Counsel
	Elbert Ellis; Anthony George	CDB	Operations Officer-Social Analyst
	Valerie Isaac; Hopeton Peterson; Paul Saunders	CDB	ESU unit
	Farmala Jacobs	CDB	Gender Specialist
	Ian Durant	CDB	Director of Economics Department
	Malcolm Buamah	CDB	Chief Risk Officer
	O'Reilly Lewis	CDB	Head of Economic Infrastructure Division
DATA COLLECTION INTERVIEWS			
Belize	Alexander Augustine	CDB	Project officer – Caye Caulker Seventh Power Project
	Christopher Straughan	CDB	Supervising officer for Seventh Power Project
	Nigel Blair	CDB	Project officer for Belize road projects
	Erwin Flores	Belize Water Services	Project engineer/manager
	Evondale Moody and team	Belize Ministry of Infrastructure; Development and Housing	Project Engineering Coordinator
	Cynthia Williams; Dylan Williams	Belize Womens / Gender Unit; Family support services	Supervisor and Human Development Coordinator
	Kevin Petzold; Kadie Usher	Belize Electricity Limited power projects	Project Coordinator; Health and Environmental Specialist
	Dr Victoriana Pascual	Ministry of Agriculture; Food Security and Enterprise	Acting Chief Agriculture Officer
	Ingrid Acosta; Dionne Barker; Dian Maheia	Ministry of Education; Culture; Science and Technology	Project Coordinator; Engineer; Chief Executive Officer
	Osmond Martinez; Karlene McSweeney	Belize Ministry of Economic Development	Chief Executive/CDB Director for Belize; Senior Economist

	Cel Icho	Department of Environment	Representing the Chief Environmental Officer (Anthony Mai)
	Zane Castillo; Cristina Seawell	CDB	Belize Road Safety Unit– Project Manager; Finance Specialist
	Karlene McSweeney	Belize Ministry of Economic Development	Senior Economist
Guyana	Paul Saunders	CDB	Environment Officer
	Theron Siebs; Alfred King; Saddam Hussain; Ritesh Tularam; O’Neill	Guyana Ministry of Education	Project Coordinator; Permanent Secretary; Chief Education Officer; Deputy Chief Education Officer
	Vladimir Persaud; Jermaine Braithwaite; Shirley; Nigel Erskine; Heidi Gillette	Public Works Team	Permanent Secretary, Ministry of Public Works; Project Coordinator, Sea and River Defence Project; Safeguards Officer, Linden Road Project; Project Manager, Linden Road Project; Assistant Project Manager, Linden Road Project
	Jermaine Braithwaite; Dennis Ramasingh	Ministry of Public Works	Sea and River Defences Project Team
	Theron Siebs, O’Neill; John Ayeni; Foreman	Skills Development and Employability	Ministry of Education; Supervisory Team Leader, Vitab Engineering; Team Leader (Kallco Guyana Inc)
	Theron Siebs, O’Neill; Prof Clement Sankat; Jainarine Sookpaul	Hospitality and Tourism Training Institute	Ministry of Education; Guyana Tech Training College; GuySuCo Training Centre
	Shirley, Heidi Gillette; Stuart Hughes; Ashanta Osborne	Linden to Mabura Hill Road Project	Ministry of Public Works; Mott MacDonald; Alya Construction
	Tarachand Balgobin; Dorinda Shako	Ministry of Finance	Director; Economic and Financial Analyst
	Paul Murphy	CDB	Education Specialist, SSD
	Zayid Alleyne	CDB	Operations Officer
Haiti	Stephen Lawrence; Daniel Altine	CDB	Country Representative; Operations Officer
HQ	Toussant Boyce	CDB	Office for Integrity Compliance and Accountability

Saint Lucia	Rachael Skeete	CDB	Implementation Officer
	Amanda Nantis Jones		Project Infrastructure Officer. Gordon Walker Memorial Methodist School
	Marie-Grace Auguste; Mr Kodra; Edith Emmanuel	EQuIP Project Management Team	EQuIP Project Officer; Education DPS; Ministry of Education PC
	Maeir Sifflet	Department of Sustainable Development	Development Control Authority
	Maurice Norville; Zilta George-Leslie	WASCO Project Team	PC; Officer in Charge
	Nicholas Johnny; Dahna Deterville	MHWCRR project PMU staff	PC; Project Officer
	Andrea Gill	CDB	Seventh Water (John Compton Dam), Eighth Water, and Millenium Highway and West Coast Road
	Paul Murphy	EQuIP Project	Team Leader
	Julian McBarnette	CDB	Environmental Officer
Saint Vincent and the Grenadines	Giselle; Shimeque; Elseworth; Herman	Economic planning unit	Geothermal project officers
	Cecil Harris	Sandy Bay Project	Project Manager National Disaster Management Project
	Lance Peters; Sheri Roberts; Yvette Pompey	VINLEC	Deputy Director Energy Unit; Project Officer; Permanent Secretary
	Daniel Campbell	Public Sector Investment Unit	Supervisor
	Samson	BNTF Team	
	Nancy Laatunen	Port Modernisation Project	Social and Gender Consultant
	Dr Vaughn Lewis	VINLEC	CEO
	Nancy Laatunen		Social and Gender Expert
	Dianna Ralph; Nayasha Hamilton	Social Safeguards Team	Social Safeguards Project Officer; Environmental Resource Analyst

APPENDIX 3 DOCUMENT CHECKLIST MATRIX FOR SAMPLED PROJECTS

Country	Project	Project Category	Approval Date	Project Appraisal	ESIA	ESMP	ESSM	ESRP Checklist	CCVA/ CRVA	Gender Action Plan
Belize	Seventh Power Project (Caye Caulker Submarine)	A	2019	Y	Y		Y		Y	
	Philip Goldson Highway and Remate Bypass Upgrading Project	B	2020	Y	Y				Y	Y
	Enhancing Sugarcane Farmer's Resilience to Natural Hazard Events	B	2020	Y						
	Second Road Safety Project	B	2018	Y						Y
	Sixth Road (Coastal Highway Upgrading) Project	B	2018	Y	Y		Y		Y	Y
	Belize Enhancement Sector Reform Programme II	B	2015	Y	Summary analysis in project document					Y
	Third Water–Ambergris Caye	B	2018	Y	Summary analysis in project document				Y	Y
Grenada	Integrated Solid Waste Management Project	A	2014	Y	EIA					Y
Guyana	Hospitality And Tourism Training Institute Project	B	2020	Y	Summary analysis in	Y	Y		Y	Y

Country	Project	Project Category	Approval Date	Project Appraisal	ESIA	ESMP	ESSM	ESRP Checklist	CCVA/ CRVA	Gender Action Plan
					project document					
	Sea and River Defences Project	B	2013	Y	Y				Y	
	Linden To Mabura Hill Road Upgrade	B	2020	Y	Y		Y		Y	Y
	Skills Development and Employability Project	B	2017	Y	Summary analysis in project document	Y				Y
Montserrat	Montserrat Port Development Project (UKCIF)	A	2017	Y	Y		Y			
Saint Lucia	Millennium Highway and West Coast Road Reconstruction Project	B	2020	Y	Summary analysis in project document				Y	Y
	Seventh Water (John Compton Dam Rehabilitation) Project	B	2015	Y						
	Eighth Water (Dennery North Water Supply)	B	2016	Y	Summary analysis in project document					Y
	Education Quality Improvement Project	B	2016	Y	Summary analysis in project document					Y
Saint Vincent and the Grenadines	Port Modernisation Project	A	2019	Y	Y	Y			Y	Y

Country	Project	Project Category	Approval Date	Project Appraisal	ESIA	ESMP	ESSM	ESRP Checklist	CCVA/ CRVA	Gender Action Plan
the Grenadines	SVG Electricity Services Ltd. Utility Battery Storage and Grid-Connected Solar Photovoltaic Project	B	2020	Y	Summary analysis in project document				Y	
	School Improvement Project-Phase I	B	2020	Y						Y
	Energy Efficiency Measures and Solar Photovoltaic	B	2017	Y					Y	
	Geothermal Drilling Project (IDB)	B	2016	Y	Summary in project document					Y
	Sandy Bay Sea Defences Resilience Project	B	2019	Y	Y					

APPENDIX 4 IFI PERFORMANCE REQUIREMENT COMPARISON MATRIX

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
Enumeration of Environmental and Social Safeguards/ Review Procedures	<p>ESRP # 1: Pollution Prevention, Control and Management</p> <p>ESRP # 2: Toxic and Hazardous Substances Control and Management</p> <p>ESRP # 3: Physical Cultural Property</p> <p>ESRP # 4: Natural Habitats and Biodiversity Conservation</p> <p>ESRP # 5: Directly Affected Communities</p> <p>ESRP # 6: Vulnerable Groups</p> <p>ESRP # 7: Land Acquisition and Resettlement</p> <p>ESRP # 8: Community,</p>	<p>Environmental and Social Standard (ESS) # 1: Assessment and Management of Environmental and Social Risks and Impacts</p> <p>ESS # 2: Labour and Working Conditions</p> <p>ESS # 3: Resource Efficiency and Pollution Prevention and Management</p> <p>ESS # 4: Community Health and Safety</p> <p>ESS # 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</p> <p>ESS # 6: Biodiversity Conservation and Sustainable Management of</p>	<p>Environmental and Social Performance Standard (ESPS) #1: Assessment and Management of Environmental and Social Risks and Impacts</p> <p>ESPS # 2: Labour and Working Conditions</p> <p>ESPS # 3: Resource Efficiency and Pollution Prevention</p> <p>ESPS # 4: Community Health, Safety, and Security</p> <p>ESPS # 5: Land Acquisition and Involuntary Resettlement</p> <p>ESPS # 6: Biodiversity Conservation and Sustainable Management of</p>	<p>Safeguard requirements 1: environment (defined broadly to cover environmental safeguard requirements pertaining to biodiversity conservation and sustainable management of natural resources, pollution prevention and abatement, occupational and community health and safety, and conservation of physical cultural resources)</p> <p>Safeguard requirements 2: involuntary resettlement</p> <p>Safeguard requirements 3: Indigenous Peoples</p>	<p>Operational Safeguard (OS) 1: Environmental and social assessment to determine a project's environmental and social category and the resulting environmental and social assessment requirements.</p> <p>OS 2: Involuntary resettlement land acquisition, population displacement and compensation.</p> <p>O S 3: Biodiversity and ecosystem services, which aims to conserve biological diversity and promote the sustainable use of natural resources.</p> <p>OS 4: Pollution prevention and control, hazardous materials and resource efficiency, which covers the</p>	<p>Social, Environmental and Climate Assessment Procedure (SECAP) # 1: Biodiversity</p> <p>SECAP # 2: Resource efficiency and pollution</p> <p>SECAP # 3: Cultural heritage</p> <p>SECAP # 4: Indigenous Peoples</p> <p>SECAP # 5: Labour and working conditions</p> <p>SECAP # 6: Community health and safety</p> <p>SECAP # 7: Physical and economic resettlement</p> <p>SECAP # 8: Financial intermediaries and direct investments</p> <p>SECAP # 9: Climate change</p>

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
	<p>Worker Health and Safety</p> <p>No specific ESRP on gender, but gender is treated in a cross-cutting fashion.</p> <p>No specific ESRP on consultation with project-affected and other interested parties, but ESRP document emphasises the need for such consultation.</p> <p>No specific ESRP on Indigenous Peoples, but they are explicitly considered under ESRP # 6 on vulnerable groups.</p> <p>No specific ESRP on FIs, but FIs are covered elsewhere in the ESRP document.</p>	<p>Living Natural Resources</p> <p>ESS # 7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</p> <p>ESS # 8: Cultural Heritage</p> <p>ESS # 9: Financial Intermediaries (FIs)</p> <p>ESS # 10: Stakeholder Engagement and Information Disclosure</p> <p>No specific ESS on gender, but gender receives cross-cutting treatment</p>	<p>Living Natural Resources</p> <p>ESPS # 7: Indigenous Peoples</p> <p>ESPS # 8: Cultural Heritage</p> <p>ESPS # 9: Gender Equality</p> <p>ESPS # 10: Stakeholder Engagement and Information Disclosure</p> <p>No specific ESPS on FIs, but FIs are covered elsewhere in the document.</p>	<p>Safeguard requirements 4: special requirements for different finance modalities (programme lending, multi-tranche financing facilities, emergency assistance loans, existing facilities, FI lending, and general corporate finance)</p>	<p>range of key impacts of pollution, waste, and hazardous materials for which there are agreed international conventions, as well as comprehensive industry-specific and regional standards, including greenhouse gas accounting.</p> <p>OS 5: Labour conditions, health and safety – This safeguard establishes the Bank's requirements for its borrowers or clients concerning workers' conditions, rights and protection from abuse or exploitation.</p> <p>No specific OS on consultation with project-affected and other interested parties, but the safeguards policy document emphasises the need for such consultation.</p> <p>No specific OS on gender, but gender</p>	

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
					receives cross-cutting treatment. No specific OS on FI financing, but this is covered elsewhere in the policy document.	
Project Screening and Classification	<p>CDB uses the following classification:</p> <p>Category “A” projects: those with the potential for significant, diverse, unique, irreversible, or otherwise adverse environmental or social impacts and/or risks. Comprehensive formal environmental and/or social analysis is required using specialised and independent technical expertise.</p> <p>Category “B” projects: those with the potential for limited</p>	<p>The Bank classifies all projects (including projects involving FIs) into one of four categories: High risk, substantial risk, moderate risk or low risk, depending, inter alia, on the type, location, sensitivity, and scale of the project; the nature and magnitude of the potential environmental and social risks and impacts; and the capacity and commitment of the borrower (including any other entity responsible for the implementation of the project) to manage the environmental and</p>	<p>The following impact classifications apply:</p> <p>Category A: Operations that can potentially cause significant adverse environmental or social impacts or have profound implications affecting natural resources.</p> <p>Category B: Operations that have the potential to cause mostly local and short-term negative environmental or social impacts and for which effective mitigation measures are known and readily available.</p>	<p>Projects are assigned to one of the following four categories:</p> <p>(i) Category A. A proposed project is classified as Category A if it is likely to have significant adverse environmental impacts that are irreversible, diverse, or unprecedented. These impacts may affect an area larger than the sites or facilities subject to physical works. An EIA is required.</p> <p>(ii) Category B. A proposed project is classified as Category B if its potential adverse environmental</p>	<p>Projects are classified for environmental and social impacts as follows:</p> <p>Category 1: Bank operations likely to cause significant environmental and social impacts. Any project requiring a full RAP under the provisions of the Bank’s policy on involuntary resettlement is also deemed to be Category 1. Category 1 programme-based operations or regional and sector loans require a strategic environmental and social assessment (SESA), and Category 1 investment projects require an ESIA, both leading to the</p>	<p>The following risk classification is used for projects:</p> <p>High Risk: This classification takes into account whether the potential risks and impacts associated with a project have most or all of the following characteristics: (i) Result in sensitive, irreversible or unprecedented significant risks and impacts (for example, resulting in loss of major natural habitat or conversion of wetlands); (ii) Result in risks and impacts that are significant in magnitude and/or spatial extent (large geographical area or size of the population likely to be affected); (iii) Have significant risks and impacts that affect an area much broader than the sites or facilities subject to physical interventions; (iv) Result in significant adverse cumulative or transboundary impacts; (e) High probability of serious adverse effects to</p>

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
	<p>adverse environmental or social impacts and/or readily identified risks. They may be site-specific or require mitigation and management measures that are readily known and easily addressed. The environment or social assessment may be limited, requiring that specific issues be addressed based on CDB's PR.</p> <p>Category "C" projects: those having little or no potential for adverse environmental or social impacts. Environmental and social appraisal is generally not required beyond the requirements necessary to</p>	<p>social risks and impacts in a manner consistent with the ESSs.</p>	<p>Category C: Operations that can cause minimal or no adverse environmental or social impacts.</p> <p>FI operations: Operations for which the financing structure involves the provision of funds through FIs or through delivery mechanisms involving intermediation whereby the FI undertakes the task of subproject appraisal and monitoring.</p> <p>In addition to the impact classification, the IDB will assign a risk classification using an Environmental and Social Risk Rating (ESRR) based on a four-level risk rating: low, moderate, substantial, or</p>	<p>impacts are less adverse than those of Category A projects. These impacts are site-specific, few if any of them are irreversible, and in most cases, mitigation measures can be designed more readily than for Category A projects. An initial environmental examination is required.</p> <p>(iii) Category C. A proposed project is classified as Category C if it likely has minimal or no adverse environmental impacts. No environmental assessment is required, although environmental implications need to be reviewed.</p> <p>(iv) Category FI. A proposed project is</p>	<p>preparation of an ESMP. For a project requiring a full RAP, the ESIA includes, and—if there are no other issues requiring assessment—may be limited to, the social assessment needed to prepare the FRAP.</p> <p>Category 2: Bank operations likely to cause less adverse environmental and social impacts than Category 1. Likely impacts are few in number, site-specific, largely reversible, and readily minimised by applying appropriate management and mitigation measures or incorporating internationally recognised design criteria and standards.</p> <p>Category 3: Bank operations with negligible adverse environmental and social risks.</p>	<p>human health and/or the environment (e.g., due to accidents, toxic waste disposal); (vi) Risks and potential impacts are not readily remedied by preventative actions or mitigation measures; (vii) The area affected is of high value and sensitivity, for example, sensitive and valuable ecosystems and habitats (legally protected and internationally recognised areas of high biodiversity value), lands or rights of Indigenous Peoples and other vulnerable minorities, intensive or complex involuntary resettlement or land acquisition, or impacts on cultural heritage; (viii) There are significant concerns that the project's adverse social impacts and associated mitigation measures may give rise to significant social conflict, harm, significant risks or impacts on human security; (i) There is a history of unrest in the project area or significant concerns regarding the activities of security forces; (xx) The project is being developed in a legal or regulatory environment where there is significant uncertainty</p>

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
	<p>categorise the project.</p> <p>Category “FI”: typically, the financing structure is usually through a line of credit provided by CDB to a financial intermediary responsible for appraisal, disbursing and monitoring resources provided for sub-projects to multiple small and medium-sized private sector borrowers.</p>		<p>high. Key factors considered in the ESRR are cause (direct environmental and social impacts), contribution (indirect environmental and social impacts), and additional areas of risk that may be relevant to the delivery of environmental and social mitigation measures and outcomes.</p>	<p>classified as Category FI if it involves investment of ADB funds to or through an FI.</p>	<p>Category 4: Bank operations involving lending to financial intermediaries that on-lend or invest in sub-projects that may produce adverse environmental and social impacts. Financial intermediaries include banks, insurance, reinsurance and leasing companies, microfinance providers, private equity funds and investment funds that use the Bank’s funds to lend or provide equity finance to their clients. Financial intermediaries also include private or public sector companies that receive corporate loans or loans for investment plans from the Bank that are used to finance a set of sub-projects.</p> <p>Projects are also classified for climate</p>	<p>or conflict regarding the jurisdiction of competing agencies, legislation or regulations do not adequately address the risks and impacts of complex projects, changes to applicable legislation are being made, or enforcement is weak; (xxi) There are significant concerns related to the capacity, commitment and track record of project stakeholders in relation to engagement, or there are several external factors that could have a significant impact on the project’s environmental or social performance, or outcomes. Additionally, a project is classified as high risk when it finances one or more of the following activities: (i) New construction, rehabilitation or upgrade of large/major dams or reservoirs (more than 15-metre-high wall, more than 500-metre long crest, and/or with a reservoir exceeding 3 million m³) or incoming flood of more than 2,000 m³; (ii) New construction or upgrade of large-scale irrigation schemes (above 999 hectares per scheme); (iii) New construction, or upgrade of rural roads (annual average</p>

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
					<p>change risk, as follows:</p> <p>Category 1: Projects may be very vulnerable to climate change and require a detailed evaluation of climate change risks and adaptation measures. Comprehensive, practical risk management and adaptation measures should be integrated into the project design and implementation plans.</p> <p>Category 2: Projects may be vulnerable to climate change and require a review of climate change risks and adaptation measures. Practical risk management and adaptation options should be integrated into the project design and implementation plans.</p>	<p>daily traffic [AADT] above 1,000); (iv) Surface water abstraction: significant extraction/diversion or containment of surface water, leaving the river flow less than 5 per cent above the environmental flow when downstream user requirements are taken into account; (v) Ground water abstraction: withdrawal of groundwater in areas already experiencing soil subsidence due to over-abstraction and/or increasing groundwater depth (e.g., observed in existing wells) and/or withdrawal of groundwater close to the recharge rate (considering all abstraction needs from the groundwater unit); (vi) Large-scale aquaculture or mariculture of at least 50 hectares on one site; (vii) Economic or physical displacement (e.g., land, potable water and water for other uses), or physical resettlement of more than 100 households or businesses, and/or significant loss of assets or access to resources (i.e., over 15 reduction in a farmer's or community's assets); (viii) Conversion and</p>

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
					<p>Category 3: Projects are not vulnerable to climate change. Voluntary consideration of low-cost risk management and adaptation measures is recommended, but no further action is required.</p>	<p>loss of physical cultural resources.</p> <p>Substantial risk: A project should be classified as Substantial Risk when it is not as complex as a high risk project, and its environmental and social scale is not in such a sensitive area but may pose significant risks and impacts if not adequately managed. These potential risks and impacts have most or all of the following characteristics: (i) They are mostly temporary, predictable or reversible, and the nature of the project makes it possible to entirely avoid or reverse them; (ii) There are concerns that the project's adverse social impacts and associated mitigation measures may give rise to a limited degree of social conflict, harm or impacts on human security; (iii) The geographical area and size of the population likely to be affected are medium to large; (iv) There is some potential for cumulative or transboundary impacts, but they would be less severe and more readily avoided or mitigated than in a high risk project; (v) There is medium to low probability of serious</p>

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
						<p>adverse effects to human health or the environment (e.g., due to accidents, toxic waste disposal), and there are known and reliable mechanisms to prevent or minimise such incidents; (vi) The project's effects on areas of high value or sensitivity are expected to be lower than for high risk projects; (vii) Mitigation or compensation measures may be designed more easily and be more reliable than those of high risk projects; (viii) The project is being developed in a legal or regulatory environment where there is uncertainty or conflict regarding the jurisdictions of competing agencies, legislation or regulations do not adequately address the risks and impacts of complex projects, changes to applicable legislation are being made, or enforcement is weak; (i) The past experience of the borrower/recipient/partner and implementing agencies in developing complex projects is limited, and their track records regarding environmental and social issues suggest that some concerns can be addressed through implementation</p>

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
						<p>support; (xx) There are concerns about capacity and experience in managing stakeholder engagement, but these can be readily addressed through implementation support.</p> <p>Additionally, a project may be classified as Substantial Risk when it finances one or more of the following activities: (i) New construction, rehabilitation or upgrade of medium dams/reservoirs (between 10–14-metre-high wall and/or with a reservoir of 100,000 to 3 million m³); (ii) New construction or upgrade of medium-scale irrigation schemes (between 300–999 hectares per scheme); (iii) New construction or upgrade of rural roads (AADT between 400–1,000); (iv) Development of a large-scale agro-processing facility; (v) Aquaculture or mariculture of 25 to 49 hectares on one site; (vi) Construction or operation causing an increase in traffic on rural roads; (g) Economic or physical displacement (e.g., land, potable water, water for other uses), or physical resettlement of 20–100 households or businesses, or a 10 to 15 per cent reduction in</p>

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
						<p>a farmer' or community's assets.</p> <p>The project category will be upgraded to high risk if the environmental and social screening exercise shows significant risks and impacts.</p> <p>Moderate risk: A project should be classified as moderate risk when potential adverse risks and impacts on human populations or the environment are not likely to be significant. This may be because the project is not complex or large, does not involve activities with high potential for harming people or the environment, and is located away from environmentally or socially sensitive areas. The potential risks and impacts are: (i) Predictable and expected to be temporary or reversible; (ii) Low in magnitude; (iii) Site-specific, without the likelihood of impacts beyond the project life cycle; (iv) Low probability of serious adverse effects to human health or the environment (e.g., they do not involve the use or disposal of toxic materials, or routine safety precautions are expected to be sufficient to</p>

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
						<p>prevent accidents); (v) The project's risks and impacts can be easily mitigated in a predictable manner. Additionally, a project is classified as Moderate Risk when it finances one or more of the following activities: (i) Small dam or reservoir construction (5 to 9-metre-high wall, and/or with a reservoir below 100,000 m³); (ii) Construction of small-scale irrigation schemes rehabilitation/development (below 300 hectares per scheme); (iii) New construction, rehabilitation or upgrade of rural roads (AADT below 400); and/or (v) Aquaculture or mariculture of less than 25 hectares on one site.</p> <p>Low Risk: projects that have negligible or no environmental or social implications. Examples include: (i) Technical assistance grants for agricultural research and training; (ii) Research; (iii) Extensions; (iv) Health; (v) Nutrition; (vi) Education; and (vii) Capacity- and institution building; (viii) Risks and potential impacts are not readily remedied by</p>

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
						<p>preventative actions or mitigation measures; (xix) The area affected is of high value and sensitivity, for example, sensitive and valuable ecosystems and habitats (legally protected and internationally recognised areas of high biodiversity value), lands or rights of Indigenous Peoples and other vulnerable minorities, intensive or complex involuntary resettlement or land acquisition, or impacts on cultural heritage; (xx) There are significant concerns that the project's adverse social impacts and associated mitigation measures may give rise to significant social conflict, harm, significant risks or impacts on human security; (xxi) There is a history of unrest in the project area or significant concerns regarding the activities of security forces; (xxii) The project is being developed in a legal or regulatory environment where there is significant uncertainty or conflict regarding the jurisdiction of competing agencies, legislation or regulations do not adequately address the risks and impacts</p>

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
						<p>of complex projects, changes to applicable legislation are being made, or enforcement is weak; (xxiii) There are significant concerns related to the capacity, commitment and track record of project stakeholders in relation to engagement, or there are several external factors that could have a significant impact on the project's environmental or social performance, or outcomes. Additionally, projects are classified for climate risk, as follows:</p> <p>High Risk: The outcome of the project will be jeopardised by climate change, with the potential for severe impacts of significant irreversibility. Climate-related risks and impacts will likely result in financial, environmental or social underperformance or failure. Adaptation measures are likely to be ineffective, extremely costly, socially unacceptable or may increase risk and reduce resilience. Adaptation limits may be reached, or loss and damage may occur.</p>

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
						<p>Substantial risk: There is the potential for widespread impacts from climate change. Climate change may undermine outcomes, and adaptation measures may not be readily available. Financial, environmental and social underperformance or failure cannot be excluded. However, risk-management activities will likely increase the resilience and adaptive capacity of households, infrastructure, communities and ecosystems.</p> <p>Moderate risk: Impact from climate change may occur but will be limited, transient or manageable. Financial, environmental and social underperformance or failure is unlikely. The system has the capacity to manage volatility, shocks, stressors or changing climate trends.</p> <p>Low risk: No negative impact from climate change is expected based on the best available data. Financial, environmental and social underperformance or failure appears very unlikely.</p>
Types of Impacts to be Identified	The environmental	All relevant direct (caused by the	All relevant direct, indirect, and	At an early stage of project	Environmental and social assessment	All relevant direct, indirect, cumulative, and induced

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	and social assessment shall consider all potential direct, indirect, transboundary, and cumulative impacts and risks that could result from the proposed project.	project and occurring contemporaneously in the location of the project), indirect (caused by the project but is later in time or farther removed in distance than a direct impact but is still reasonably foreseeable), and cumulative (incremental impact of the project when added to impacts from other relevant past, present and reasonably foreseeable developments as well as unplanned but predictable activities enabled by the project that may occur later or at a different location) environmental and social risks and impacts throughout the project life cycle are assessed in an integrated way.	cumulative environmental and social risks and impacts of the project will be identified, including the issues identified in ESPSs 2 through 10 and those likely to be affected by such risks and impacts.	preparation, the borrower/client will identify potential direct, indirect, cumulative and induced environmental and social impacts.	includes the project's area of influence (both upstream and downstream), a comprehensive scoping of the project's components, consideration of alternatives, and assessment of cumulative impacts (i.e., impacts on areas and resources that result from the proposed project in addition to impacts from other existing or planned developments, including from any associated facilities, regardless of which entity undertakes those actions. Cumulative impacts can result from individually minor but collectively significant actions that take place over a period of time), where relevant.	environmental and social impacts must be identified.

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Mitigation Hierarchy	No explicit reference to a mitigation hierarchy, but reference is made to the need to assess possible measures to avoid, minimise, or mitigate environmental and social risks and/or impacts of the proposed project.	The following mitigation hierarchy is applied: (i) Anticipate and avoid risks and impacts; (ii) Where avoidance is not possible, minimise or reduce risks and impacts to acceptable levels; (iii) Once risks and impacts have been minimised or reduced, mitigate; and (iv) Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.	The mitigation hierarchy to address identified risks and impacts will favour the avoidance of impacts over minimisation and, where residual impacts remain, compensate/offset wherever technically and financially feasible.	No explicit reference to a mitigation hierarchy, but the policy is to minimise, mitigate, and/or compensate for adverse project impacts on the environment and affected people when avoidance is not possible.	In line with any relevant requirements in the Bank's OSs, the assessment considers real alternatives to the project's location and/or design to avoid adverse impacts. It applies the mitigation hierarchy: if avoidance is not possible, reduce and minimise potential adverse impacts; if reduction or minimisation is not sufficient, mitigate and/or restore; and as a last resort, compensate for and offset.	Guiding principles and requirements are provided to avoid, minimise, reduce or mitigate the adverse impacts of IFAD-supported projects. However, no explicit reference is made to a mitigation hierarchy.
Stakeholder Consultation and Participation	CDB requires the borrower to provide evidence to demonstrate that there has been "meaningful consultation and participation" of affected persons for projects requiring	The borrower is required to undertake consultations with project-affected and other interested parties. Consultations must be meaningful, in that they should: (i) Begin early in the	The borrower will engage with stakeholders throughout the project life cycle. It will commence such engagement as early as possible in the project development process and in a	ADB is committed to working with borrowers/clients to put meaningful consultation processes into practice. For policy application, meaningful consultation is a process that: (i)	Meaningful consultation and participation in the context of safeguards are vital. In line with multilateral financial institutions' best practice, the Integrated Safeguards System (ISS) sets out clear	Consultation is mandatory and inclusive, ensuring non-discrimination and aims to provide opportunities for disadvantaged and vulnerable groups or individuals to participate in and benefit from projects on an equal basis with others. Consultation through a combination of appropriate tools and approaches, leading

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
	comprehensive environment and social impact studies and that there will be full disclosure of the findings of these studies. “Meaningful consultation and participation” requires that this was preceded by satisfactory stakeholder analysis and provided for: (i) engagement and participation of stakeholders (including representative bodies and civil organisations) in the project preparation stage and is carried out throughout the project cycle; (ii) timely disclosure of relevant and adequate information in a form that can be easily understood and accessed by affected people;	project planning process to gather initial views on the project proposal and inform project design; (ii) Encourage stakeholder feedback, particularly as a way of informing project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts; (iii) Continue on an ongoing basis, as risks and impacts arise; (iv) Be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally	timeframe that enables meaningful consultations with stakeholders on project design and development. The nature, scope, and frequency of stakeholder engagement will be proportionate to the nature and scale of the project, its development and implementation timeline, and its potential risks and impacts. Such consultations will provide stakeholders with timely, relevant, understandable, and accessible information and will consult with them in a culturally appropriate manner, free of manipulation, interference, coercion, discrimination, and intimidation.	begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle; (ii) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people; (iii) is undertaken in an atmosphere free of intimidation or coercion; (iv) is gender-inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and (v) enables the incorporation of all relevant views of affected people and other stakeholders into decision-making, such as project design, mitigation measures, the	requirements for greater public consultation among and participation by communities and local stakeholders likely to be affected by the Bank’s operations. Consultation must meet the requirements of being “free, prior and informed” and of achieving broad community support, especially in high risk projects or projects affecting vulnerable groups. In particular, the ISS makes it clear how consultations should be integrated into specific steps in the assessment process, such as developing draft Terms of Reference for an environmental and social assessment, draft reports of SESAs or ESAs, and draft ESMPs for Category 1 projects.	to consent, should be initiated as early as possible during design. The results should be documented and reflected in the SECAP review note. Free, prior and informed consent must be sought when project activities affect communities' land access and use rights.

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
	(iii) respect of the culture and knowledge practices of vulnerable groups and communities; (iv) undertaking in an atmosphere free of external manipulation, coercion and intimidation; (v) gender-inclusive and responsive; (vi) facilitating expression and incorporating the views of the affected people and other stakeholders in project design decision-making; and (vii) sharing of development benefits and opportunities.	appropriate format, in relevant local language(s) and is understandable to stakeholders; (v) Consider and responds to feedback; (vi) Support active and inclusive engagement with project-affected parties; (vii) Be free of external manipulation, interference, coercion, discrimination, and intimidation; and (viii) Be documented and disclosed by the borrower.	Stakeholder engagement will involve the following steps: (i) stakeholder identification and analysis, (ii) planning how the engagement with stakeholders will take place, (iii) disclosure of information, (iv) consultation with stakeholders, (v) addressing and responding to grievances, and (vi) reporting to stakeholders.	sharing of development benefits and opportunities, and implementation issues. ADB will require borrowers/clients to engage with communities, groups, or people affected by proposed projects and with civil society through information disclosure, consultation, and informed participation in a manner commensurate with the risks to and impacts on affected communities.		
Grievance Redress	The borrower shall identify a grievance mechanism that provides people affected by projects supported by the	The borrower is required to establish a grievance mechanism that is expected to address concerns promptly and effectively, in a	The IDB requires its borrowers to implement an effective grievance mechanism to receive and assist with resolving any concerns and	ADB requires that the borrower/client establish and maintain a GRM to receive and facilitate the resolution of	The Bank ensures that clients establish credible and independent local grievance and redress mechanisms to help resolve affected people's grievances	IFAD requires that all borrowers/recipients/partners adopt an easily accessible grievance mechanism at the project level in order to receive and resolve concerns and complaints of people who may be adversely affected or

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
	<p>Bank with an accessible, transparent, fair and effective process for receiving, evaluating and addressing complaints about environmental or social harms caused by any such project/programme throughout the project cycle. The need for and the design of the mechanism should be scaled to the level of potential risks and adverse impacts identified in the project design. The mechanism should be adequately resourced, easily accessible, culturally appropriate and transparent. The mechanism should consider the availability of</p>	<p>transparent manner that is culturally appropriate and readily accessible to all project-affected parties, at no cost and without retribution. The mechanism, process or procedure will not prevent access to judicial or administrative remedies, including the World Bank Inspection Panel (now known as the accountability mechanism). The borrower will inform the project-affected parties about the grievance process during its community engagement activities and will make a record documenting the responses to all grievances received publicly available.</p> <p>A separate mechanism is required to address</p>	<p>grievances of stakeholders that may arise in connection with the project's environmental and social performance.</p> <p>The mechanism will not tolerate retaliation, such as threats, intimidation, harassment, or violence, against those who voice their opinion or opposition to the IDB-financed project or to the borrower.</p> <p>The presence of the project grievance mechanism will not prevent recourse to appropriate local grievance mechanisms or directly to the IDB, which will respond within a reasonable timeframe. In</p>	<p>affected peoples' concerns and grievances about the borrower's/client's social and environmental performance at the project level. The GRM should be scaled to the risks and impacts of the project. It should address affected people's concerns and complaints promptly, using an understandable and transparent process that is gender-responsive, culturally appropriate, and readily accessible to all segments of the affected people.</p> <p>A separate mechanism is required to address project workers' grievances that functions on the same terms as the project grievance mechanism.</p>	<p>and concerns regarding the environmental and social impacts of the project.</p> <p>In addition, the Bank has an Independent Review Mechanism (IRM) whose mandate is to provide people who are, or are likely to be, adversely affected by a project financed by the Bank Group as a result of a violation of the Bank Group's policies and procedures with an avenue to request the Bank to comply with its own policies and procedures. The requestors first seek to resolve their complaints with bank management, but if, in their opinion, Bank Management has not adequately handled their complaints, they may submit their requests to IRM. The IRM comprises two separate but related phases: (i) a</p>	<p>potentially harmed by IFAD-supported projects that fail to meet the SECAP Standards and related policies.</p> <p>Furthermore, IFAD requires borrowers/ recipients/ partners to inform project-affected people about the existence and functioning of this mechanism in any easily understandable form and language and to integrate it into the overall community engagement strategy. The grievance redress mechanism should incorporate existing formal and informal grievance mechanisms, strengthened or supplemented as needed for each specific project and in proportion to the expected risks and impacts of the project. Project-affected people may use the grievance mechanism without retribution or reprisal, and the grievance mechanism should not impede access to other judicial or administrative remedies available under national law or through existing arbitration procedures or other accountability mechanisms.</p> <p>A separate mechanism is required to address project workers' grievances that functions on the same terms as</p>

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	<p>judicial recourse that may be pre-existing at the national, local, regional, sub-regional or institutional level or be project specific. Use of the mechanism will not prevent complaints from being filed directly with CDB.</p> <p>A separate mechanism is required to address project workers' grievances that functions on the same terms as the project grievance mechanism.</p>	<p>project workers' grievances that functions on the same terms as the project grievance mechanism.</p>	<p>addition, the IDB's Independent Consultation and Investigation Mechanism (ICIM) provides a mechanism and process to address allegations of harm by projects due to noncompliance by the IDB with one or more of its operational policies, including the ESPF.</p> <p>A separate mechanism is required to address project workers' grievances that functions on the same terms as the project grievance mechanism.</p>	<p>In May 2003, the ADB adopted a new accountability mechanism whereby people adversely affected by ADB-financed projects can express their grievances, seek solutions, and report alleged violations of ADB's operational policies and procedures, including safeguard policies. The accountability mechanism replaced ADB's Inspection Function (1995). Complaints can be submitted directly, even without recourse to the project's GRM.</p>	<p>grievance or problem-solving phase, led by the Compliance, Review and Mediation Unit reporting directly to the Bank President, to assist project-affected people in finding solutions to their problems; and (ii) a compliance review phase, led by a three-member panel drawn from the IRM roster of experts.</p>	<p>the project grievance mechanism.</p>
Borrower/IFI Institutional and Implementation Arrangements	<p>The borrower is responsible for the effective implementation of projects financed by CDB. However,</p>	<p>No explicit discussion.</p>	<p>No explicit discussion.</p>	<p>The borrower/client is responsible for assessing projects and their environmental and social impacts,</p>	<p>During project implementation, the borrower or client is responsible for implementing the ESMP and reports to the Bank on key</p>	<p>All assessments and studies required at the project design stage are primarily the responsibility of the borrower/recipient/partner, including any additional assessments or studies deemed</p>

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	CDB may choose to attach specific environmental and social clauses or conditions to the loan contract to ensure that specific environmental and social requirements are adhered to during project implementation and operations to minimise risks to the interests and negative impacts on the reputation of the Bank.			preparing safeguard plans, and engaging with affected communities through information disclosure, consultation, and informed participation, following all policy principles and safeguard requirements. The borrower/client will submit all required information to ADB for review, including assessment reports, safeguard plans/frameworks, and monitoring reports. To ensure that contractors appropriately implement the agreed measures, the borrower/client will include the safeguard requirements in bidding documents and	management or monitoring tasks set out in the ESMP. For all projects, the Bank coordinates with relevant national authorities to ensure that the implementation of environmental and social mitigation measures contained in the ESMP, the RAP, and other relevant loan covenants is duly and jointly monitored and reported during project supervision missions. Through its Compliance and Safeguards function, the Bank may conduct compliance audits or appoint an independent monitoring team to the project if there is a serious risk of noncompliance with Bank policies and procedures or in other cases that the Bank deems appropriate.	necessary during project implementation. Assessments and studies must be carried out by independent experts selected by the borrower/recipient/partner as per national legislation. IFAD will support this process to ensure that both SECAP requirements and those of borrowers/ recipients/ partners are met in ways that enhance the borrowers / recipients / partners' capacity development in areas of assessed need.

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				civil works contracts.		
Use of Borrower E&S Framework	No explicit reference to the possibility of using the Borrower's E&S Framework.	<p>When a project is proposed for Bank support, the borrower and the Bank will consider whether to use all, or part, of the Borrower's E&S Framework in the assessment, development and implementation of a project. Such use may be proposed, provided this is likely to address the risks and impacts of the project and enable the project to achieve objectives materially consistent with the ESSs.</p> <p>The Bank reviews the Borrower's E&S Framework. If the assessment identifies gaps, the borrower will work with the Bank to identify measures</p>	<p>The IDB may consider the use of the borrower's environmental and social framework relevant to the project, provided this is likely to address the risks and impacts of the project and will enable the project to achieve objectives and outcomes equivalent to those achieved with the application of the ESPF (functional equivalence). The IDB will review the borrower's environmental and social framework to assess whether it is functionally equivalent to the ESPF. It will work with the borrower to identify and agree on measures and actions to address any gaps</p>	<p>Application of Country Safeguards Systems (CSS) in ADB-financed projects is not automatic or mandatory. ADB may consider the application of a borrower's CSS to identify and manage the social and environmental risks associated with ADB-financed projects at the national, subnational, sector, or agency level provided that: (i) the CSS is equivalent to ADB's (equivalence assessment), that is, the CSS is designed to achieve the objectives and adhere to the policy scope, triggers, and applicable</p>	No specific reference to the conditions under which a borrower's environmental and social framework can be used, but the Bank intends that the environmental and social assessment process will support and strengthen existing country systems for environmental, climate, and social risk management, including those specifically related to OSs 2–5, such as systems and institutions covering resettlement, biodiversity protection, pollution control, and labour standards. To achieve this objective, the borrower or client should conduct the assessment and the preparation of an ESMP in a manner that complies with	No explicit reference to the possibility of using the borrower's environmental and social framework.

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
		and actions to address such gaps.	that are found to strengthen the aforementioned framework. ESPS requirements will apply in all areas where the framework is not deemed functionally equivalent.	<p>principles set out in this SPS; and (ii) the borrower has the acceptable implementation practice, track record, and capacity (acceptability assessment), and commitment to implement the applicable laws, regulations, rules, and procedures in the country, specific sector, or agency concerned.</p> <p>ADB is responsible for assessing and determining the equivalence of the CSS and the adequacy of the borrower's implementation practice and capacity. ADB coordinates closely with other possible development partners when preparing the equivalence and</p>	existing country systems for assessing and managing environmental risk, as well as with the AfDB's requirements. The Bank considers this experience in developing its assistance to RMCs for assessing and strengthening the capacity of country systems.	

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				<p>acceptability assessments.</p> <p>CSS will not be applied to highly complex and sensitive projects. These types of projects will be considered under ADB's standard project-processing requirements.</p>		
Documentation Requirements	<p>The findings of the screening and categorisation process are recorded in an ESSM.</p> <p>Appraisal reports must integrate the findings and recommendations of the environmental and social assessment process in the overall project design, costing, cost-benefit analyses, project management and implementation arrangements.</p>	<p>The borrower will carry out an environmental and social assessment of the project to assess the environmental and social risks and impacts of the project throughout the project life cycle. The assessment will be proportionate to the potential risks and impacts of the project and will assess, in an integrated way, all relevant direct, indirect and cumulative environmental and social risks and</p>	<p>The IDB's project-related documentation and agreements will include provisions to address its environmental and social standards, as outlined in the ESPF, and project-specific requirements resulting from its due diligence as documented in the ESAP. These provisions and requirements ensure compliance with all applicable ESPs. Legal documents will also include, as applicable and in</p>	<p>Preparation of an environmental management plan (EMP) is required, which includes the proposed mitigation measures, environmental monitoring and reporting requirements, related institutional or organisational arrangements, capacity development and training measures, implementation schedule, cost estimates, and performance indicators.</p>	<p>The borrower or client prepares a full RAP for (i) any project that involves 200 or more persons (as defined by the involuntary resettlement policy) or (ii) any project that is likely to have adverse effects on vulnerable groups. For any project in which the number of people to be displaced is fewer than 200 people and land acquisition and potential displacement and disruption of livelihoods are less significant, the borrower or client</p>	<p>At the concept stage, required documents include a preliminary SECAP Review Note with a screening checklist, proposed risk categorisation and required management plans (e.g., ESCMF), a draft stakeholder engagement plan, and draft TORs for management plans (e.g., ESCMF).</p> <p>At the design stage, required documents include a Project Design Report (PDR) and Project Implementation Manual (PIM) containing targeting strategy, social, environmental, and climate measures as well as risk mitigation measures, a SECAP Review Note with final risk categories, the grievance redress mechanism, and</p>

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
		<p>impacts throughout the project life cycle, including those specifically identified in ESSs 2–10. As appropriate, the assessment will embody elements or a combination of an ESIA); environmental audit; hazard or risk assessment; social and conflict analysis; ESMP; ESMF; regional or sectoral EIA; and an SESA.</p> <p>The Bank will agree on an Environmental and Social Commitment Plan (ESCP) with the borrower. The ESCP will set out the material measures and actions required for the project to meet the ESSs over a specified timeframe. The ESCP will form part of the legal</p>	<p>accordance with Bank policies, procedures and regulations, rights and/or remedies that the IDB would exercise if the borrower fails to implement the environmental and/or social provisions consistent with the requirements of the project-financing agreement(s).</p> <p>Projects involving physical or economic displacement require a RAP, and projects affecting Indigenous Peoples require an Indigenous Peoples Plan (IPP).</p>	<p>Disclose a draft environmental assessment (including the EMP) in a timely manner, before project appraisal, in an accessible place and in a form and language(s) understandable to affected people and other stakeholders. Disclose the final environmental assessment and its updates, if any, to affected people and other stakeholders.</p> <p>Where involuntary resettlement is involved, prepare a resettlement plan elaborating on displaced persons' entitlements, the income and livelihood restoration strategy, institutional arrangements,</p>	<p>prepares an Abbreviated Resettlement Action Plan (ARAP).</p>	<p>Management plans (ESIA, ESCMF, ESCMP, stakeholder, and other relevant plans) along with disclosure of studies as necessary.</p> <p>At the project review stage, required documents include a Revised PDR, PIM, and management plans as needed.</p> <p>Following loan negotiation and Executive Board approval, respectively, revised and final documentation (see above) are required.</p> <p>During implementation monitoring, required documents include supervision reports, supervision of the implementation of management plans and modification as required, review of other planning documents (e.g., Gender Action Plan, capacity-building plans, E&S audit reports, consent agreements), and documentation of complaints and how these have been addressed.</p> <p>Finally, following project completion, required documentation includes a Project Completion Report</p>

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		<p>agreement. The legal agreement will include, as necessary, the borrower's obligations to support the ESCP's implementation.</p> <p>Projects involving physical or economic displacement require an RAP, and projects affecting Indigenous Peoples require an IPP.</p>		<p>monitoring and reporting framework, budget, and time-bound implementation schedule. Disclose a draft resettlement plan, including documentation of the consultation process in a timely manner, before project appraisal, in an accessible place and a form and language(s) understandable to affected persons and other stakeholders. Disclose the final resettlement plan and its updates to affected persons and other stakeholders.</p> <p>Where the project affects indigenous people, prepare an IPP based on the social impact assessment with the assistance of qualified and</p>		(PCR) and possibly ex-post studies.

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				<p>experienced experts and that draws on indigenous knowledge and participation by the affected indigenous communities. The IPP includes a framework for continued consultation with the affected Indigenous Peoples communities during project implementation; specifies measures to ensure that Indigenous Peoples receive culturally appropriate benefits; identifies measures to avoid, minimise, mitigate, or compensate for any adverse project impacts; and includes culturally appropriate grievance procedures,</p>		

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
				<p>monitoring and evaluation arrangements, and a budget and time-bound actions for implementing the planned measures. Disclose a draft IPP, including documentation of the consultation process and the results of the social impact assessment in a timely manner, before project appraisal, in an accessible place and in a form and language(s) understandable to affected Indigenous Peoples communities and other stakeholders. The final IPP and its updates will also be disclosed to the affected Indigenous Peoples communities and other stakeholders.</p>		

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
				<p>Upon completion, draft equivalence and acceptability assessments (including gap-filling measures, if any) at the national, subnational, sector, or agency level will be documented and disclosed on ADB's website for public comment. Upon completion, final equivalence and acceptability assessment reports will be disclosed on ADB's website.</p> <p>No further documentation requirements are specified.</p>		
Monitoring and Reporting	Both the borrower and CDB will carry out performance monitoring and share the results with each other. The primary objective of supervision and	The borrower will monitor the environmental and social performance of the project in accordance with the legal agreement (including the ESCP). The extent and mode of	The borrower will establish procedures to monitor and measure the effectiveness of the environmental and social management programme, as	Both the borrower/client and ADB have their own separate monitoring responsibilities. The extent of monitoring activities, including their	The Bank monitors implementation through quarterly reports by borrowers and clients and during its own supervision missions, using the proportionality and adaptive	Project monitoring is the responsibility of the borrower/recipient/partner, complemented by IFAD's supervision and implementation support. Monitoring normally includes tracking: (i) implementation and performance of social, environmental and climate

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	performance monitoring is to identify, predicted and unanticipated changes to the physical or social environment, brought about by the project, to assess compliance with approved project design, the effectiveness of agreed mitigation measures and the overall project management execution arrangements and conditions of the loan agreement, as well as the monitoring and reporting requirements for each project are included in the project supervision and reporting plan and are included as a condition of the loan agreement. The borrower is	monitoring will be agreed upon with the Bank and will be proportionate to the nature of the project, the project's environmental and social risks and impacts, and compliance requirements. The borrower will ensure that adequate institutional arrangements, systems, resources and personnel are in place to carry out monitoring. Based on the monitoring results, the borrower will identify any necessary corrective and preventative actions and incorporate these in an amended ESCP or the relevant management tool in a manner acceptable to the Bank.	well as compliance with any related legal and/or contractual obligations and regulatory requirements. Where other government agencies or third parties are responsible for managing specific risks and impacts and associated mitigation measures, the borrower will establish and monitor such measures. Where appropriate, borrowers will consider involving representatives from project-affected people and other stakeholders to participate in monitoring activities. The borrower's monitoring programme should be overseen by the appropriate level	scope and periodicity, will be commensurate with the project's risks and impacts. Borrowers/clients must implement safeguard measures and relevant safeguard plans, as provided in the legal agreements, and submit periodic monitoring reports on their implementation performance. ADB will require borrowers/clients to: (i) establish and maintain procedures to monitor the progress of implementation of safeguard plans, (ii) verify the compliance with safeguard measures and their progress toward intended outcomes, (iii) document and disclose monitoring results	management principles to differentiate projects based on the nature and category of the risks. For projects presenting high environmental and social risks, the Bank may, at its own discretion, perform compliance audits. The Bank's Compliance and Safeguards Division ³ monitors the environmental and social performance of the Bank's projects in consultation with borrowers and/or clients. For complex projects or when conflicts with host communities arise, the Bank makes use of independent third parties—independent environmental and social advisers, consultants, monitors and auditors—to monitor compliance. The Bank ensures that the reports of these monitoring exercises are publicly	adaptation or mitigation measures (including adaptive management processes) included in the ESCMP; (ii) plans such as the RAP or IPPs; (iii) bidding documents; and (iv) relevant clauses of the financing agreement.

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	responsible for implementation of the ESMP and is required to report and advise CDB on its key management and monitoring requirements, related loan conditions and of any environmental and social information, such as complaints or litigation pertaining to the project, even if these are not specific to the use of the CDB's resources. Supervision and Performance reports shall include a section on the implementation status of any ESMP, including those measures required to avoid, minimise or mitigate environmental		<p>in the project's organisational structure. The borrower will retain external experts to verify its monitoring information for projects with significant impacts. The extent of monitoring should be commensurate with the project's environmental and social risks and impacts and with compliance requirements.</p> <p>In addition to recording information to track performance and establishing relevant operational controls, the borrower should use dynamic mechanisms, such as internal inspections and audits, where relevant, to verify compliance and</p>	<p>and identify necessary corrective and preventative actions in the periodic monitoring reports, (iv) follow up on these actions to ensure progress toward the desired outcomes, (v) retain qualified and experienced external experts or qualified NGOs to verify monitoring information for projects with significant impacts and risks, (vi) use independent advisory panels to monitor project implementation for highly complex and sensitive projects, and (vii) submit periodic monitoring reports on safeguard measures as agreed with ADB. 58. ADB reviews project</p>	available to all parties in line with the Bank's Disclosure and Access to Information policy.	

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
	and social risks and/or impacts.		progress toward the desired outcomes.	performance against borrowers'/clients' commitments as agreed in the legal documents. The extent of ADB's monitoring and supervision activities will be commensurate with the project's risks and impacts.		
Emergency Preparedness and Response	No explicit reference to emergency preparedness and response.	Referenced under certain individual ESSs rather than at the overall project level.	Where the project involves specific activities, aspects, and facilities that are likely to generate impacts, the ESMS will establish and maintain an emergency preparedness and response system so that the borrower, in collaboration with appropriate and relevant third parties and relevant government agencies and authorities, will be prepared to respond to	No explicit reference to emergency preparedness and response.		No explicit reference to emergency preparedness and response.

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
			accidental and emergency situations associated with the project in a manner appropriate to prevent and mitigate any harm to people and/or the environment.			
Disclosure Requirements	The CDB's Information Disclosure Policy is based on providing disclosure, with access to the broadest external audience possible, to provide the opportunity to increase public exposure and broaden stakeholder understanding of the CDB's activities. This principle also applies to the environment and social assessment process. Environment and social documentation			See above under documentation requirements.	The Bank's revised policy on Disclosure and Access to Information is based on the principle of maximum disclosure, enhanced access to information, and limited exceptions. The Bank applies these principles to the environmental and social assessment process, ensuring progressive disclosure of documents at key stages during the project cycle and making documents available to the public on request, through the Integrated Safeguards Tracking System (ISTS).	IFAD's Policy on the Disclosure of Documents, approved in 2010, adopted the principle of "presumption of full disclosure". Sharing draft and final ESIA's and other relevant documents with project stakeholders and interested parties is subject to this principle. It is mandatory to disclose these documents, when available, in a timely manner within DRM, on IFAD's website and in an accessible place in the project-affected area, in a form and language understandable to project-affected parties and other stakeholders. Sharing these documents not only keeps all parties informed but ensures their meaningful input into project design and risk mitigation. This disclosure should consider any specific information needs of the community (e.g., related to

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
	<p>may be made available at key stages of the ESIA process in the project cycle. For Category “A” projects, the Borrower is required to release the cleared draft report of the findings of the EIA or ESIA process, as well as provide a non-technical executive summary to the public. Sufficient notice of the release of the documents and the location where they can be accessed must be given prior to formal public consultations on the draft report's findings. A record of comments and concerns raised in the public consultations process is</p>					<p>culture, disability, literacy, mobility or gender). For documents to be prepared and disclosed after Executive Board approval, the details and timing of delivery, and disclosure of the documentation will be set out in the financing agreement.</p>

Aspect of Environmental and Social Procedures	CDB	WB	IDB	ADB	AfDB	IFAD
	required to be kept as part of the official project records. The final EIA or ESIA report submitted to the Bank must include a summary of the issues and concerns raised in the consultation process and provide information on how these are addressed in project design.					

APPENDIX 5 MAXQDA DATA ANALYSIS

