Understanding and Leveraging the World Bank's Environmental & Social Framework: A Toolkit for MENA CSOs

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I.   Introduction

This guide, in its third part, is designed to address a critical area for civil society organizations (CSOs) across the Arab region: *understanding and engaging with the World Bank's Environmental and Social Framework (ESF) and its Environmental and Social Standards (ESS)*. Building on the foundation laid in the previous toolkits, where the [first part](#) focused on navigating the World Bank's website and locating/understanding project-related documents, and the [second part](#) focused on explaining the WB's different lending instruments, this part provides a more in-depth look at how the Bank, through its ESF, ensures that projects financed through Investment Project Financing (IPF) align with sustainable development goals.

CSOs in the region often struggle to understand the complex policies that guide the World Bank's operations, particularly regarding its environmental and social standards. This difficulty arises from the technical language and procedural complexity of these frameworks. However, building a strong understanding of the World Bank's ESF is crucial for several reasons, especially for CSOs seeking to advocate for transparency, accountability, and community rights in development projects.

First, the ESSs place a clear responsibility on borrowers to identify, assess, and manage environmental and social risks throughout the entire project cycle—from planning and design to implementation, monitoring, and completion. This approach not only outlines how risks should be mitigated but also creates well-defined entry points where CSOs can engage. By participating at various stages, CSOs can ensure that environmental and social considerations are fully integrated into project design and implementation.

Second, the ESF emphasizes the important role of stakeholders, particularly affected communities, in the development process. It mandates consultations, public participation, and continuous information disclosure. This requirement reinforces the role of CSOs as key advocates for community interests, providing them with a formal avenue to ensure that local concerns and rights are recognized, prioritized, and integrated into project decisions.

By explaining the ESF and breaking down its key components, this guide seeks to empower CSOs to actively monitor compliance, raise concerns when standards are not being met, and advocate for development outcomes that prioritize both social well-being and environmental sustainability.

II.   Understanding the World Bank's ESF & ESSs

For projects funded through Investment Project Financing (IPF)[1], the World Bank applies the [Environmental and Social Framework (ESF)](#) to manage environmental and social risks. The ESF sets out the World Bank's commitment to sustainable development through: [the Environmental and Social Policy](#), which outlines the Bank's due diligence[2] responsibilities, and [ten Environmental and Social Standards (ESSs)](#), which set clear requirements for borrowers.

➔ *Breakdown of the Environmental and Social Standards*

Each ESS addresses specific environmental or social concerns, providing detailed guidelines for borrowers and setting clear expectations for compliance:

ESS1: Assessment and Management of Environmental and Social Risks and Impacts
ESS1 requires borrowers to identify, assess, manage, and monitor environmental and social risks associated with projects financed by the World Bank's IPF. The standard emphasizes the use of a mitigation hierarchy—prioritizing risk avoidance, followed by risk minimization, reduction, and finally, compensation or offsetting if adverse impacts remain. Borrowers are required to prepare an Environmental and Social Commitment Plan (ESCP) that outlines the actions needed to comply with the ESSs. This ESCP must be disclosed early in the project cycle. Continuous stakeholder engagement and information disclosure, as mandated under ESS10, are key components of ESS1 to ensure transparency and community involvement.

CSOs can review the project's Environmental and Social Review Summary to understand the assigned risk rating and identify key environmental and social risks and impacts. They can also monitor the implementation of essential documents such as the Environmental and Social Commitment Plan , the Environmental and Social Management Framework, and other relevant plans throughout the project lifecycle to ensure compliance with commitments outlined in these documents.

ESS2: Labor and Working Conditions
ESS2 aims to promote safety and health at work, ensure fair treatment and equal opportunities for all project workers, and protect vulnerable workers, including women, persons with disabilities, children of legal working age, migrant workers, and others. It also seeks to prevent the use of forced labor and child labor. Additionally, ESS2 requires that

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[1] [A Toolkit for MENA Activists: Understanding the World Bank's Different Lending Instruments (DPF, PfoR, IPF)](#)
[2] The World Bank's responsibility to ensure borrower compliance with the ESF, and oversee project implementation to verify alignment with Bank policies.

project workers be provided with accessible means to raise workplace concerns, ensuring that their rights and safety are prioritized throughout the project's lifecycle.

CSOs can monitor and report labor rights violations, including unsafe working conditions and discrimination. For example: If a construction project funded by the Bank employs workers in poor conditions, CSOs can advocate for fair wages, safe working environments, and protection against retaliation through engagement with grievance mechanisms.

ESS3: Resource Efficiency and Pollution Prevention and Management

ESS3 aims to improve resource efficiency and manage pollution throughout a project's lifecycle. It promotes sustainable use of resources like energy, water, and raw materials, emphasizes responsible waste management, pollution reduction, and minimizing risks associated with pesticide use.

CSOs can monitor the project's resource consumption and waste management practices and push for the adoption of cleaner technologies and pollution reduction strategies. Example: CSOs can raise concerns if a project discharges untreated waste into water sources and advocate for the installation of proper waste treatment facilities.

ESS4: Community Health and Safety

ESS4 focuses on managing health, safety, and security risks posed to communities by project activities and infrastructure. It covers aspects like infrastructure design, road safety, hazardous materials, diseases, and emergency preparedness.

CSOs can ensure that community health and safety plans are in place and implemented effectively and monitor risks particularly for vulnerable groups. Example: If a road project increases the risk of traffic accidents, CSOs can advocate for road safety measures such as pedestrian walkways, speed limits, and proper signage.

ESS5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement

ESS5 addresses the impacts of project-related land acquisition and restrictions on land use, which can lead to physical displacement (such as relocation or loss of residential land) and economic displacement (loss of income or livelihood due to loss of access to land or assets). The objectives of ESS5 are to avoid involuntary resettlement wherever possible, minimize displacement by considering alternative project designs, and prevent forced evictions. When displacement is unavoidable, ESS5 aims to mitigate negative social and economic impacts by providing timely compensation at replacement cost and supporting displaced persons in restoring or improving their livelihoods and living standards.

CSOs can assist displaced persons in securing fair compensation and adequate resettlement support as well as monitor the resettlement process and ensure compliance with agreed plans. **Example: CSOs can intervene if resettled families are not compensated at replacement cost, advocating for their rights through public campaigns.**

ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
ESS6 focuses on protecting biodiversity and managing natural resources sustainably. It emphasizes conservation of critical habitats (such as forests), sustainable resource use, and involvement of local communities (such as including Indigenous Peoples whose livelihoods depend on these resources.)

CSOs can monitor the project's impact on biodiversity and sensitive ecosystems and advocate for alternative project designs that avoid damage to natural habitats. *Example: If a project threatens a protected forest, CSOs can campaign for independent biodiversity assessments and conservation plans.*

ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
ESS7 recognizes the rights, cultures, and identities of Indigenous Peoples and underserved traditional communities. It requires meaningful consultation, equitable project benefits, and protection of cultural heritage.

CSOs can ensure that Indigenous Peoples' voices are heard and monitor whether project benefits are delivered equitably and cultural practices respected. *Example: CSOs can facilitate consultations with Indigenous people to ensure their land rights are protected.*

ESS8: Cultural Heritage
ESS8 safeguards both tangible and intangible cultural heritage from project-related risks and promotes the preservation of cultural resources.

CSOs can help identify cultural heritage sites at risk and work to ensure that they are protected. *Example: If a development project threatens a historic site, CSOs can work with experts and communities to demand project redesign or protective measures.*

<u>**ESS9: Financial Intermediaries**</u>

ESS9 outlines how Financial Intermediaries (FIs)[3] must assess and manage environmental and social risks related to their subprojects, promoting sound governance and sustainable outcomes.

CSOs can monitor the activities of FIs to ensure they uphold environmental and social standards and demand transparency and disclosure of FI-funded subprojects.

<u>**ESS10: Stakeholder Engagement and Information Disclosure**</u>

ESS10 emphasizes transparent and meaningful engagement with stakeholders throughout the project lifecycle. It requires stakeholder identification, consultations, feedback mechanisms, and timely information disclosure.

CSOs can advocate by demanding timely, accessible, and understandable disclosure of project information in local languages. Example: CSOs can intervene if affected communities are excluded from consultations, advocating for multilingual materials, accessible formats, and continuous dialogue mechanisms.

The World Bank Group's Environmental and Social Framework (ESF) is a critical mechanism designed to ensure that development projects not only achieve their development objectives but also protect the environment and the well-being of affected communities. ***However, the effectiveness of the ESF hinges on its proper implementation. This is where civil society organizations (CSOs) come in—they have a key role in monitoring compliance and advocating for the rigorous implementation of the ESF.*** To be effective in this role, CSOs must be well-versed in the provisions of the ESF and understand the various entry points for engagement and oversight throughout the project lifecycle.

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[3] Institutions such as commercial banks, national development banks, microfinance institutions, or investment funds that receive World Bank financing to invest in or lend to subprojects. For example, the World Bank may provide funding to a commercial bank, which then lends to businesses or projects. FIs are required to assess, manage, and monitor environmental and social risks in line with the Bank's standards and ensure that their subprojects comply with applicable safeguards.

III.   Entry Points for Engagement through ESS10

Effective engagement with stakeholders is essential for ensuring that development processes benefit the communities and address their concerns. The World Bank's ESS10, mandates this engagement throughout the project lifecycle.

Who is considered a Stakeholder?
Stakeholders are categorized into:
1. Directly Affected Parties: Those directly impacted by the project, including their representatives.
2. Interested Parties: Groups like government agencies, businesses, academic institutions, or NGOs concerned with the project's focus.
Stakeholders should be identified early in the project cycle. Special attention is given to vulnerable groups, such as the elderly, women, children, minorities, indigenous populations, people with disabilities, and LGBTQ+ individuals.

Stakeholder Engagement Plan (SEP)
The borrower must develop a Stakeholder Engagement Plan (SEP) that outlines how stakeholders will be informed and consulted. The SEP must include:
- Details on the type of information shared, the format, and dissemination methods.
- Channels for stakeholders to provide input and receive feedback.
- Procedures for updating the SEP as needed.
The SEP should be accessible in appropriate formats and languages and communicated through various channels.

Consultations and Information Sharing
Before World Bank approval, the borrower must share information about the project's risks, mitigation measures, and compensation plans with affected communities. Formal consultations should be held throughout the project, with frequency based on the project's risk level. The SEP should detail how consultations will be conducted, documented, and updated.

Grievance Mechanism
A grievance mechanism must be established to address complaints. The SEP should specify how to file grievances, the process for handling them, and measures to protect complainants from retaliation. If the project-level mechanism fails to resolve issues, stakeholders can escalate their concerns to the World Bank's management or the independent Inspection Panel.

For more information about ESS10 please refer to this document.

IV.   Accountability

Now that we've discussed the 10 Environmental and Social Standards (ESSs), it's essential to know what options are available if the World Bank fails in its due diligence or if any of the ESSs are violated. Individuals or communities impacted by projects funded by the World Bank have three main avenues to raise their concerns or grievances about potential negative impacts:

  - **Who Can File a Complaint?** Groups of two or more individuals or authorized representatives from the project's country who feel their rights or interests have been or may be harmed due to violations of the Bank's policies.

1. **Project-Level Grievance Redress Mechanism (GRM):** The GRM is a local process where people impacted by a project can file complaints directly with the project implementer. If the issue is not resolved or if there is a lack of trust in the process, the GRM should offer the complainants the option to seek assistance from an independent and credible body to address their concerns.

2. **Grievance Redress Service (GRS):** The GRS allows individuals and communities to submit complaints directly to the World Bank's management if they believe a project funded by the Bank has caused or could cause harm. For information on how to file a complaint, you can refer to [this link](#).

3. **Inspection Panel:** This is the World Bank's independent accountability mechanism. Affected people or communities can request an inspection to investigate whether the World Bank has failed to comply with its own policies and procedures, which may have led to harm. The Inspection Panel operates as a non-judicial, independent body that evaluates the Bank's adherence to its environmental and social standards and the Environmental and Social Framework. Complaints through this mechanism can result in either dispute resolution (if all parties agree) or a compliance review to determine if the World Bank followed its policies correctly. Download the complaint [form here](#) and for more information, visit this [website](#).

V.   Conclusion

A thorough understanding of the World Bank's Environmental and Social Framework (ESF) is essential for civil society organizations aiming to influence development outcomes. The ESF, through its ten Environmental and Social Standards (ESSs), establishes concrete requirements that, when enforced, can help safeguard communities, protect the environment, and ensure inclusive, sustainable development.

This guide highlights not only the importance of each ESS but also the strategic opportunities CSOs have to influence project outcomes. By actively engaging in reviewing project documentation, participating in consultations, monitoring the implementation of social and environmental commitments, and utilizing grievance mechanisms, CSOs can ensure that the rights and interests of affected communities are central to the development process.

Sustained CSO engagement has been shown to make a measurable difference—whether by ensuring fair compensation for displaced communities, advocating for labor protections, or preventing harm to sensitive ecosystems. We hope this toolkit equips you with the practical knowledge and strategies necessary to leverage the ESF effectively, ensuring that development initiatives truly reflect the needs and rights of the communities they intend to serve.

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