

# Review and Update of the World Bank Safeguard Policies

## Comments on the Draft Environmental and Social Framework

**FINAL**

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# 1 Our Starting Point

1.1.1 The World Bank's (and International Finance Corporation's – WB and IFC) environmental and social safeguard policies are as the gold standard, and the most important benchmark, that we use in our public health and impact assessment work. Our experience has shown that many public and private sector clients hold this view, particularly, in low and middle-income countries. WB (and IFC) set the agenda for how development is designed, built, operated and decommissioned.

1.1.2 Human health and wellbeing (health) is a key explicit and implicit goal of the global sustainable development objectives of WB. Health is an important and is increasingly seen by governments internationally as an important social outcome; many positive social outcomes explicitly or implicitly have a health dimension.

1.1.3 The health status of individuals and communities is a result of a complex web of factors – environmental, social, economic, cultural, political, behavioural and individual. Adequately and appropriately assessing, monitoring and managing community health impacts to effectively safeguard and improve community health requires an understanding of the links between these factors and health and their explicit and effective inclusion in the environmental and social assessment guidance and practice. Health therefore needs to be fully and inclusively discussed in the revised World Bank's Environmental and Social Framework (WB ESF) starting with Environmental and Social Standard 1 and running through to ESS 10.

1.1.4 The comments included in this submission focus on the domain of community health, how it is included and articulated in the World Bank's Environmental and Social Framework components and how it aligns with the current international best practice and the World Health Organisation's position on Health Impact Assessment and the inclusion of health in other impact assessments.

1.1.5 We warmly acknowledge the positives already built into the current Draft.

1.1.6 We also salute the Banks for the open and inclusive manner in which it is developing the framework, are grateful for the opportunity to comment and want to support it formally

and informally in developing and enhancing the WB's efforts to better consider, assess, monitor and manage health impacts in its work.



## 2 Structure of Our Comments

- 2.1.1 The focus of our comments has been on public, environmental and community health, how it is included and articulated in the Bank's Environmental and Social Framework components ESS1 and ESS4 and how it aligns with what is widely thought of as the current international best practice and what we judge to be the World Health Organisation's position on Health Impact Assessment and the inclusion of health in other impact assessments. We have used our experience in Public Health and in conducting Health Impact Assessment and the Health Component of Environmental and Social Impact Assessments (i.e. Environmental, Social and Health Impact Assessments) to evidence their value.
- 2.1.2 Our comments build on and complement the comments and issues raised in the International Association for Impact Assessment (IAIA) London Expert Roundtable Summary Report, February 2015.
- 2.1.3 In making the comments that we do we have taken the position of trying to push the boundaries of what might be achievable in amending the ESF and ESSs. We also recognise that our comments are one of many and that there is the potential for conflict/contradiction between our suggested amendments and what others have suggested. Hence, whilst keeping within the existing structure of the Draft, our comments are in the spirit of providing a critical and aspirational community health/health equity lens, to how the current ESF and ESSs can be flexible, inclusive and fit for purpose for the first half of the twenty-first century.
- 2.1.4 We have used a tabular format to show the current version of a sentence or phrase and our suggested amendment and accompanying explanatory note as appropriate.

## 3 Overarching Comments

### 3.1 Working with other Country and Institutional Environmental, Social and Health Standard

- 3.1.1 Overall, we think there are more positives than negatives in using country and other institutional standards where these are well aligned with the Bank's ESF. It promotes a sense of inclusion and equity in that it can enable and empower the improvement of country and institutional standards to meet the bar of the Bank's Standards. However, this does mean that the Bank and its staff will need to be vigilant that in trying to use country and other institutional standards that the Bank's high standards are not watered down or diminished.
- 3.1.2 The due diligence assessment of whether a project complies with, for example ESS4 Community health and Safety requirements is usually undertaken by Bank and FI staff or practitioners without a strong public health background. Furthermore, research has pointed out that safeguard experts and government officials are often overburdened with the management of multiple simultaneous projects. This poses the risk of focusing the due diligence process on traditional more straightforward areas/issues and leaving community health issues to a secondary plane or being reduced to a checklist exercise instead of a meaningful and thoughtful appraisal of potential links between projects, determinants of health and health outcomes. This points towards the need for an increase in human resources and capacity building to ensure an effective implementation of the WB ESF, the compliance of projects with all relevant ESSs, and strengthening of Borrowers' systems, including specific capacity building towards ensuring the objectives and requirements of ESS4 are met and complied with. Hence the importance of Bank's internal procedures (and Bank staff capacity/competency and associated internal methods/tools including external peer review) to effectively translate policy requirements regarding Borrower Framework's in relation to public/environmental/community health in particular into explicit actions and requirements.
- 3.1.3 There is the risk that without a clear articulation within the Bank ESF of what is understood by community health and the assessment of community health impacts, with

accompanying guidance and best practice procedures that Borrowers' systems will continue to poorly consider and assess community health impacts. There are World Bank and World Health Organisation publications that can be used to better articulate what is meant by community health and its consideration in environmental and social frameworks.

### **3.2 More explicit inclusion and explicit prioritisation of Community Health**

3.2.1 The inclusion of community health issues in environmental and social assessments has historically been lacking, inappropriate or incomplete. The World Bank has acknowledged that in many instances the health dimensions of projects are not systematically taken into account in environmental assessments and produced guidance on health impact assessment (HIA). Other World Bank Group organisations such as the IFC have their own specific guidance on HIA. Though it can and has been argued that the IFC HIA Guide over-focuses on the environmental health aspects of community health and in its terminology also over-focuses on health risk. The World Bank should take the opportunity presented by the review of the framework to strengthen the inclusion of community health in environmental and social assessments.

### **3.3 Naming of ESSs**

3.3.1 We would like the WB to seriously consider renaming the following two Standards:

3.3.1.1 ESS1 Assessment and Management of Environmental, Social and Health Impacts (and to revise language accordingly in the ESS).

3.3.1.2 ESS4 Community Health, Safety and Well-being (and to revise language accordingly in the ESS).

### **3.4 Use of the term 'Risk'**

3.4.1 Risk and impacts are used throughout the document, with in one place, risk and outcomes being used (see Page 10).

3.4.2 It would be clearer and easier to understand if the Bank used risk only in relation to its classification of projects and used impacts when discussing environmental and social implications (instead of risks and impacts)

- 3.4.3 First, if the Bank does want to use risk both as a classification category (High Risk, Substantial Risk, Moderate Risk or Low Risk) and risk as the potential or probability for an impact to occur then it needs to make these two uses of the term risk clear and explicit.
- 3.4.4 Secondly the use of the two terms together focuses people on negative impacts and not on positive and negative impacts equally.
- 3.4.5 Thirdly, in areas such as health, there are quantitative approaches for assessing the probability of a given health outcome in relation to a given level of chemical exposure (via air, water, soil, ingestion and contact) which are described as (population) health risk assessments and occupational health risk assessments. This can and does lead to people reading the guidance to mean that a health risk assessment type framework should be used to assess community health impacts i.e. a narrow focus on those project aspects that can be quantified as a risk such emissions into the air, water and soil and the health conditions that could result from a chemical-type exposure due to a project.

### **3.5 ESS4: Community Health, Safety and Well-being**

- 3.5.1 ESS4 Community Health and Safety could be further developed and clarified – this is apparent by the relatively short length of the ESS4 section (5 pages excluding annexes on dams) when compared to other ESSs such as ESS3 (6 pages), ESS5 (11 pages), ESS6 (8 pages), and ESS7 (10 pages). This short length is in contrast with the importance of community health as a central feature of sustainable development and to the objectives of the Bank and the projects it funds.

## 4 Detailed Comments on the World Bank's ESF Overview, Vision, ESP, EES1, ESS1 Annexes 1 and 2, and ESS4

4.1.1 Table 4.1 presents detailed suggestions on amended wording including explanatory notes where appropriate on the following:

- 4.1.1.1 Overview of the World Bank's Environmental and Social Framework (ESF Overview).
- 4.1.1.2 A Vision for Sustainable Development (Vision).
- 4.1.1.3 World bank Environmental and Social Policy (ESP).
- 4.1.1.4 Environmental and Social Standard 1 (ESS1): Assessment and Management of Environmental and Social Risks and Impacts.
- 4.1.1.5 ESS1 Annex 1: Environmental and Social Assessment.
- 4.1.1.6 ESS1 Annex 2: Environmental and Social Commitment Plan.
- 4.1.1.7 Environmental and Social Standard 4 (ESS4): Community Health and Safety.

**Table 4.1 Detailed Comments on the World Bank’s ESF Overview, Vision, ESP, EES1, ESS1 Annexes 1 and 2, and ESS4**

Point & Page No are references to the World Bank’s (WB’s) Consultation Draft

PhD No	Point & Page No	Current Wording	Suggested Wording	Explanatory Note and/or Justification
<b>Overview of the World Bank’s Environmental and Social Framework</b>				
1	Point 7 (Page 2)	EES2–10 set out the obligations of the Borrower in identifying and addressing environmental and social risks and impacts that may require particular attention.	EES2–10 set out the obligations of the Borrower in identifying and addressing environmental and social risks and impacts that require particular consideration in all projects.	The wording of this sentence should be amended because as it currently reads it implies that community health is something that should not be given particular attention in all projects. We argue that ESS2, 3, 4, 5 (excluding involuntary resettlement), 6 and 10 apply to 100% of projects. In addition all the areas should be considered/given attention to at the beginning before they are set aside as not relevant.
2	Point 7 (Page 2)	These Standards establish objectives and requirements to avoid, minimize, and, where residual risks and impacts remain, to compensate for or offset such risks and impacts.	These Standards establish objectives and requirements to firstly, avoid, minimize, mitigate, compensate for and/or offset the adverse impacts, and secondly, to improve and enhance the beneficial impacts of a project.	The wording of this sentence should be amended to something like the following because as it currently reads it implies that enhancing the positive is not an important objective. There are often

PhD No	Point & Page No	Current Wording	Suggested Wording	Explanatory Note and/or Justification
				<p>important opportunities for enhancing and improving environmental, social and health benefits that does not necessarily increase the costs to the Borrower or the WB.</p> <p>The suggested phrase “...avoid, minimize or mitigate” is used on Page 8, Point 2, and 34 in the Bank’s Draft.</p> <p>The suggested wording, while perhaps a little cumbersome brings it in line with the Mitigation Hierarchy described in ESS1, Page 22.</p>
<b>WB’s A Vision for Sustainable Development</b>				
3	NA			We like the focus on equity and disadvantaged groups/minorities.
4	NA		There needs to be a general paragraph point on the importance of community health underpinning sustainable economic development.	

PhD No	Point & Page No	Current Wording	Suggested Wording	Explanatory Note and/or Justification
5	Point 5 (Page 5): Bullet points	Conserve or rehabilitate biodiversity and natural habitats.	Conserve, rehabilitate, improve and increase biodiversity and natural habitats.	It is important that there is consideration and effort made to improve and increase (or alternatively increase and enhance)
6	Point 5 (Page 5): Bullet points	Promote worker and community health and safety	<p>Protect, promote and enhance community health, safety and well-being;            and            Protect, promote and enhance worker health and safety and wellbeing.</p> <p><u>Less good alternative:</u>            Protect, promote and enhance community and worker health, safety and well-being)</p>	<p>The bullet point should be two separate bullet points because in practice community health gets subsumed under occupational health and safety rather than being seen as public or population health management.</p> <p>If this cannot be done then community should always be the first part and workers the second. Promote is a very soft word that is defined as encouraging and supporting, community health needs to be protected and enhanced/improved/increased not just promoted.</p> <p>The suggested phrase            "...community health, safety and</p>



PhD No	Point & Page No	Current Wording	Suggested Wording	Explanatory Note and/or Justification
				well-being...” is used on Pages 16 and 34 in the Bank’s Draft.
7	Point 6 (Page 6):	Where the Borrower’s environmental and social assessment has identified potential development opportunities associated with the project, the Bank will discuss with the Borrower the feasibility of including these opportunities in the project. Where appropriate, such opportunities may be utilized to promote further development.	Where the Borrower’s environmental and social assessment has identified potential environmental and social (including health) opportunities associated with the project, the Bank will discuss with the Borrower the technical and financial feasibility of including these opportunities in the project. Where appropriate and financially feasible, such opportunities will be utilized to promote further development.	<p>Whilst recognizing that the development opportunities identified in impact assessments may require additional loan funding and therefore may not be financially feasible (is this what is meant by feasible, if so it should be explicit) it is important to recognise that many opportunities may simply be about working in step with another Bank project or other national/international public, private or NGO project or programme.</p> <p>The suggested phrase “...technical and financial feasibility...” is used in a similar way on Page 12, Point 18 in the Bank’s Draft.</p>
8	Point 9 (Page 6):	“While this Framework will not by itself guarantee sustainable development, its proper implementation will ensure the	The proper implementation of this Framework will ensure the application of standards that provide a necessary	

PhD No	Point & Page No	Current Wording	Suggested Wording	Explanatory Note and/or Justification
		application of standards that provide a necessary foundation for that objective, and provide a leading example for activities outside the scope of Bank-supported projects.”	foundation for sustainable development and provide a leading example for activities outside the scope of Bank-supported projects.	
<b>WB’s Environmental and Social Policy</b>				
9	Point 2, 2 <sup>nd</sup> sentence (Page 8):	To this end, the Bank has defined specific Environmental and Social Standards (ESSs), which are designed to avoid, minimize or mitigate the adverse environmental and social risks and impacts of projects.	To this end, the Bank has defined specific Environmental and Social Standards (ESSs), which are designed to firstly, avoid, minimize, mitigate, compensate for and/or offset the adverse environmental and social impacts, and secondly, to improve and enhance the beneficial impacts of projects.	As previously stated in PhD (Comment) No. 2
10	Point 4 (a) (Page 9)	Environmental risks and impacts, including: (i) those identified in the World Bank Group Environmental, Health, and Safety Guidelines (EHSG); <sup>8</sup> (ii) those related to community safety (including dam safety and safe use of pesticides); (iii) those related to climate change and other transboundary or global impacts; (iv) any material threat to the protection,	Environmental impacts, including: (i) those identified in the World Bank Group Environmental, Health, and Safety Guidelines (EHSG); (ii) changes to community health, safety and well-being; (iii) changes to worker health, safety and well-being; (iv) those related to climate change and other transboundary or global impacts; (v) any	As stated above separation and moving up the list of community health, safety and well-being and worker health, safety and well-being.  The phrase “(including dam safety and safe use of pesticides)” should be removed,

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		conservation, maintenance and rehabilitation of natural habitats and biodiversity; and (v) those related to the use of living natural resources, such as fisheries and forests; and	material threat to the protection, conservation, maintenance, rehabilitation, improvement and increase of natural habitats and biodiversity; and (vi) those related to the use of living natural resources, such as fisheries and forests; and	as they are very specific health issues that are not relevant for all projects. Given that dams has its own specific Annex. While it may have been understandable to highlight these issues in the past it is better if there is more guidance provided separately where the issue of dam safety and safe use of pesticides can be better discussed.
11	Point 4 (b) (Page 9)	Social risks and impacts, including: (i) threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence; (ii) risks that project impacts fall disproportionately on disadvantaged or vulnerable groups; <sup>9</sup> (iii) any prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits, particularly in the case of disadvantaged or vulnerable groups; (iv) negative economic and social impacts relating to the involuntary taking of land or restriction on access to natural	Social impacts, including: (i) the distribution of beneficial and adverse impacts; (ii) changes to the health, safety and well-being of project-affected communities; (iii) changes to the health, safety and well-being of workers (iii) threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence; (iii) impacts falling disproportionately on disadvantaged or vulnerable groups; (iv) any prejudice or discrimination toward individuals or groups in providing access to development resources and project	The low priority of community health is shown by the fact that it is mentioned as the second half of point six in a list of seven impacts along with the discussion of community health with worker health contributes to a common misunderstanding (not necessarily for WB staff but from our experience in other MFIs (that use a similar due diligence process but outsource it to independent third party IA practitioners) as well as public and private sector organisations that "health" within

PhD No	Point & Page No	Current Wording	Suggested Wording	Explanatory Note and/or Justification
		resources; (v) risks or impacts associated with land and natural resource tenure and use, including (as relevant) potential project impacts on local land use patterns and tenurial arrangements, land access and availability, food security and land values, and any corresponding risks related to conflict or contestation over land and natural resources; (vi) impacts on the health, safety and well-being of workers and project-affected communities; and (vii) risks to cultural heritage.	benefits, particularly in the case of disadvantaged or vulnerable groups; (v) involuntary taking of land or restriction on access to natural resources; (vi) changes in land and natural resource tenure and use, land use patterns and tenurial arrangements, land access and availability, food security and land values, and conflict or contestation over land and natural resources; and (ix) damage to cultural heritage.	the due diligence assessment and environmental and social assessment is mostly (or firstly and foremost) about occupational health and safety, emergency health care services, and local health services. The focus on risk also contributes to a focus on health as mostly made up of air quality, noise and transport assessments and impacts of chemical spills.
12	Point 6 (Page 10)			What is meant by a “risk and outcomes approach” and how this links to impacts and impact assessment?
<b>ESS1: Assessment and Management of Environmental and Social Risk and Impacts</b>				
13	NA		ESS1: Assessment and Management of Environmental, Social and Health Impacts  The implications of this would be far	We think the incorporation of health and the focus simply on impacts is a better articulation of the aim and objectives of this ESS.

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			reaching as everywhere environmental and social is used it would be changed to environmental, social and health.	
14	ESS1, Point 3, Page 21	Borrowers will apply ESS10, which outlines the requirements regarding stakeholder engagement, to all projects.	Borrowers will consider all the ESSs, in all projects and sub-projects and will apply those that are relevant.	<p>It is unclear why ESS10 Information Disclosure and Stakeholder Engagement is the only deserving of a mention. It also starts separating out that ESS1 and 10 as applying to all projects while the others implicitly do not (in explicit statements in the Draft). We consider that ESS1-6 and 10 apply to almost all projects in some way.</p> <p>See Bank Draft Point 29, Page 28 where for sub-projects the Drafts specifically mentions ESS1-8 and 10 in a manner similar to the above.</p>
15	ESS1, Point 6, Page 21	ESS1 applies to all projects supported by the Bank through Investment Project Financing. Borrowers will structure projects so that they meet the	Either: ESS1-10 applies to all projects supported by the Bank...	The problem with saying that ESS1 applies to all projects is that it immediately implies that the other ESSs don’t apply to all

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		requirements of the ESSs in a manner and timeframe acceptable to the Bank, as set out in the ESCP.	<p>Alternatively, the following should be added to Point 6.</p> <p>The other ESSs provide guidance on how to consider and assess key environmental and social impacts. Therefore when applying ESS1 the other ESSs must also be considered and taken into account in all projects.</p>	<p>projects. Reviewing them, even conservatively, ESS 2, 3, 5 (excluding resettlement), 6 and 10 would apply to all projects. We would say for a public sector project ESS4 would apply even if there were no communities living nearby because most public sector projects are for the benefit of citizens of a country in some way and there may be distance community impacts.</p>
16	ESS1, Point 12, Page 23	ESS1 also applies to all Associated Facilities. Associated Facilities will meet the requirements of the ESSs as set out in paragraph 30, to the extent that the Borrower has control and influence over such Associated Facilities.	<p>Either: ESS1-10 applies to all Associated Facilities...</p> <p>Alternatively, the following should be added to Point 12.</p> <p>The other ESSs provide guidance on how to consider and assess key environmental and social impacts. Therefore when applying ESS1 the other ESSs must also be considered and taken into account in all projects.</p>	See note above.
17	ESS1,	ESSs 1-10 apply to technical assistance		This statement we agree with but

PhD No	Point & Page No	Current Wording	Suggested Wording	Explanatory Note and/or Justification
	Point 13, Page 23	supported by the Bank through Investment Project Financing, whether provided through a stand-alone project or as part of a project.		<p>in the context of Bank Draft Points 6 and 12 looks odd. Why ESS1 in Investment Project Financing and Associated Facilities and ESSs1-10 for technical assistance.</p> <p>Better to have consistency across all three cases see PhD Suggested Wording and Comment No 14 and 15.</p>
18	ESS1, Point 17, Page 24	The project will comply with the applicable requirements of the Environmental Health and Safety Guidelines (EHSG).	<p>This Point should be moved up in the bank Draft to Point 3 or 4 so that this can be mentioned when the ESSs as a group are mentioned.</p> <p>For example it would allow ‘...consider ESSs and EGSGs...’ or as in the current ESS1 Annex1 “...relevant requirements of ESS-1-10, EHSG and GIIP...”</p>	<p>This is the first time in the whole Draft that Health has the same importance as Environment and Social.</p> <p>It also sits oddly as for the EHSG health is a mandatory issue that should be considered and managed unlike the implication in the document up to this point.</p> <p>Most of the community health issues are focused on safety issues linked to project related activities and by-products.</p>

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				<b>This Point emphasises our point that this ESS1 should be renamed to Assessment and Management of Environmental, Social and Health Impacts.</b>
19	ESS1, Point 21, Page 25	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 during each stage of the project cycle. The assessment will be commensurate and proportional with the potential risks and impacts of the project and the project classification assigned by the Bank, and will assess, in an integrated way, all relevant direct, indirect and cumulative environmental and social risks and impacts during each stage of the project cycle, including those specifically identified in ESSs2–10.	The Borrower will carry out an environmental and social assessment of the project to assess the environmental and social impacts of the project during each stage of the project cycle; <b>in particular those identified in the ESSs and EHSsGs</b> . The assessment will be commensurate and proportional with the potential impacts of the project and the project classification assigned by the Bank, and will assess, in an integrated way, all relevant direct, indirect and cumulative environmental and social impacts during each stage of the project cycle.	The phrase “including those specifically identified in ESSs2-10” should be higher up and would have more force if ‘including’ was changed to ‘in particular’. The use of hyphens would also make the phrase and the pint it makes stand out. Also including EHSsG which is discussed in previous Bank Draft Points and is relevant here as well.  We have taken the liberty in our suggested wording to remove the term risk but this could be added back in while still keeping our core point.
20	ESS1,	The Borrower, in consultation with the	The Borrower, in consultation with the	The Bank should consider



PhD No	Point & Page No	Current Wording	Suggested Wording	Explanatory Note and/or Justification
	Point 21, Footnote 16, Page 25	Bank, will identify and use appropriate methods and tools, including scoping, environmental and social analyses, investigations, audits, surveys and studies, to identify and assess the potential environmental and social risks and impacts associated with the proposed project. These methods and tools will reflect the nature and scale of the project, and will include, as appropriate, a combination (or elements of) the following: environmental impact assessment (EIA); environmental audit; hazard or risk assessment; social and conflict analysis; environmental and social management plan (ESMP); environmental and social management framework (ESMF); regional or sectoral EIA; strategic environmental and social assessment (SESA). Specific features of a project may require the Borrower to utilize specialized methods and tools for assessment, for example a Cultural Heritage Management Plan. Where the project is likely to have sectoral or regional impacts, a sectoral or regional EIA will be required.	Bank, will identify and use appropriate methods and tools, including scoping, environmental and social analyses, investigations, audits, surveys and studies, to identify and assess the potential environmental and social impacts associated with the proposed project. These methods and tools will reflect the nature and scale of the project, and will include, as appropriate, a combination (or elements of) the following: <b>environmental, social and health impact assessment/s;</b> <b>environmental, social and health management plan/s;</b> <b>environmental and social or environmental, social and health management framework/s;</b> environmental audit, social and conflict analyses, strategic environmental and social assessment/s. Specific features of a project may require the Borrower to utilize specialized methods and tools for assessment, for example a Cultural Heritage Management Plan. Where the project is likely to have sectoral or	changing its current terminology or adding in the use of the term ESHIA (Environmental, Social and Health Impact Assessment) ESHMP (Environmental, Social and Health Management Plan) as it is a designation in use by many actors (especially private sector ones) and explicitly highlights the importance of considering community health.  See examples: <a href="http://bit.ly/1aGHJl6">http://bit.ly/1aGHJl6</a> <a href="http://bit.ly/1ECt19M">http://bit.ly/1ECt19M</a> <a href="http://bit.ly/1wAdlxp">http://bit.ly/1wAdlxp</a>

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			regional impacts, a sectoral or regional <b>environmental, social and health impact assessment/s will be required.</b>	
21	ESS1, Point 25, Page 26	The environmental and social assessment will apply a mitigation hierarchy, which will favor the avoidance of impacts over minimization or reduction of impacts to acceptable levels, and where residual impacts remain, will compensate for/offset them, whenever technically and financially feasible.	The environmental and social assessment will apply a mitigation hierarchy, which will favor the avoidance of impacts over minimization or reduction of impacts to acceptable levels, and where residual impacts remain, will compensate for and/or offset them, whenever <b>socially, culturally,</b> technically and financially feasible.	There can social and cultural reasons why some mitigation measures cannot be implemented and it is worth saying so up-front. The easiest example is for example mitigation measures affecting Indigenous Peoples.
22	ESS1, Point 26 (a), Page 27	Environmental risks and impacts, including: (i) those defined by the EHSG; (ii) those related to community safety (including dam safety and safe use of pesticides); (iii) those related to climate change and other transboundary or global impacts; (iv) any material threat to the protection, conservation, maintenance and rehabilitation of natural habitats and biodiversity; and (v) those related to the use of living natural resources, such as fisheries and forests;	Environmental impacts, including: (i) those identified in the World Bank Group Environmental, Health, and Safety Guidelines (EHSG); (ii) changes to community health, safety and well-being; (iii) changes to worker health, safety and well-being; (iv) those related to climate change and other transboundary or global impacts; (v) any material threat to the protection, conservation, maintenance, rehabilitation, improvement and	See PhD Suggested Wording and Comment No 5 and 10 and accompanying notes (Separation and moving up the list of community health, safety and well-being and worker health, safety and well-being).  Bank Draft Point 4a, Point 5 and Point 26a (and ESS1:Annex1 Point 17E(a)) should be aligned.

PhD No	Point & Page No	Current Wording	Suggested Wording	Explanatory Note and/or Justification
			increase of natural habitats and biodiversity; and (vi) those related to the use of living natural resources, such as fisheries and forests; and	
23	ESS1, Point 26 (b), Page 27	Social risks and impacts, including: (i) threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence; (ii) risks that project impacts fall disproportionately on disadvantaged or vulnerable groups; (iii) any prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits, particularly in the case of disadvantaged or vulnerable groups; (iv) negative economic and social impacts relating to the involuntary taking of land or restriction on access to natural resources; (v) risks or impacts associated with land and natural resource tenure and use, including (as relevant) potential project impacts on local land use patterns and tenurial arrangements, land access	Social impacts, including: (i) the distribution of beneficial and adverse impacts; (ii) changes to the health, safety and well-being of affected communities; (iii) changes to the health, safety and well-being of workers (iii) threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence; (iii) impacts falling disproportionately on disadvantaged or vulnerable groups; (iv) any prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits, particularly in the case of disadvantaged or vulnerable groups; (v) involuntary taking of land or restriction on access to natural resources; (vi) changes in land and natural resource tenure and use, land	See PhD Suggested Wording and Comment No 11 and accompanying notes (separation and moving up the list of community health, safety and well-being and worker health, safety and well-being).  Bank Draft Point 4b and Point 26b (and ESS1:Annex1 Point 17E(b)) should be aligned. Point 26 unlike Point 4 does not discuss worker health, safety and well-being.

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		and availability, food security and land values, and any corresponding risks related to conflict or contestation over land and natural resources; (vi) impacts on the health, safety and well-being of workers and project- affected communities; and (vii) risks to cultural heritage.	use patterns and tenurial arrangements, land access and availability, food security and land values, and conflict or contestation over land and natural resources; and (ix) damage to cultural heritage.	
24	ESS1, Point 26, Footnote 23, Page 27	Disadvantaged or vulnerable refers to those who, by virtue of, for example, their age, gender, ethnicity, religion, physical or mental disability, social or civic status, sexual orientation, gender identity, economic disadvantages or indigenous status, and/or dependence on unique natural resources may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project’s benefits. Such a person/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. Considerations relating to age include	Disadvantaged, vulnerable or <b>sensitive</b> refers to those who, by virtue of, for example, their age, gender, <b>indigenous status or ethnicity, religious spiritual or other beliefs, physical or mental impairment, health status,</b> social or civic status, sexual orientation, gender identity, economic disadvantages and/or dependence on unique natural resources may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project’s benefits. Such a person/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as	Consider including sensitive as an additional term alongside disadvantaged and vulnerable. It is used in environmental impact assessment and has a similar meaning to the other two.  The definition should be expanded to include existing health status “those who, by virtue of, for example” ... health status ...”may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project’s benefits.”

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		<p>the elderly and minors, including in circumstances where they may be separated from their family, the community or other individuals upon which they depend.</p>	<p>such may require specific measures and/or assistance to do so.  <b>Considerations relating to the elderly, children and those with impairments include circumstances where they may be separated from their family, the community or other individuals upon which they depend.</b></p>	<p>Impairment: an injury, illness, or congenital condition that causes or is likely to cause a loss or difference of physiological or psychological function.</p> <p>Disability: the loss or limitation of opportunities to take part in society on an equal level with others due to social and environmental barriers.</p> <p>A person has an impairment, how they are treated and how their social and natural environment are structured creates their disability.                      See <a href="http://bit.ly/1DG9zao">http://bit.ly/1DG9zao</a></p>
25	ESS1, Point 29, Page 28	<p>Where subprojects are classified as High Risk, the environmental and social assessment will be consistent with ESSs 1 to 8 and ESS10.</p>	<p>This sentence should be deleted and instead see PhD No 13 suggested wording amendment to Bank Draft Point 3, Page 21:</p> <p>Borrowers will consider all the ESSs, in all projects and sub-projects and will apply those that are relevant.</p>	<p>This implies that sub-projects that are not high risk do not need to be consistent with ESSs 1-8 and 10.</p> <p>It is also unclear what consistent means in relation to the assessment.</p>

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			<p>Point 29 by removing the discussion of HIGH Risk and particular ESSs would then state:</p> <p>If the project involves the preparation of subprojects, the Borrower will carry out appropriate environmental and social assessment of each subproject in accordance with national law. Borrowers will ensure that subprojects are structured to meet national regulatory requirements relating to environmental and social risks and impacts. Where deemed necessary by the Bank, the Borrower will prepare a separate sub-project environmental and social management framework, to assist the Borrower in developing and implementing the subprojects.</p>	<p>This better links with previous Bank Draft Points as discussed previously, see PhD Suggested Wording and Comment Nos 14, 15 and 16.</p> <p>“Where deemed necessary by the Bank, the Borrower will prepare an environmental and social management framework, to assist the Borrower in developing and implementing the subprojects.”</p> <p>Is the above referring to a separate sub-project ESMF? If yes, then this needs to be explicit as in the suggested wording if not then the phrase “Where deemed necessary by the Bank” should be removed.</p>
26	ESS1, Points 35 and 36, Page 29	“...avoid, minimize, reduce or otherwise mitigate...”	“...avoid, minimize, reduce, mitigate, compensate for and/or offset...”	To align with previous wording in the Bank Draft and the full set of Mitigation Hierarchy of options to address adverse impacts.

PhD No	Point & Page No	Current Wording	Suggested Wording	Explanatory Note and/or Justification
<b>ESS1: Annex 1 Environmental and Social Assessment</b>				
27	NA	NA	A broad definition of health should be included in the Annex, that is consistent with the WHO focus on both the environmental and social determinants of health and well-being.	
28	ESS1, Annex 1, Point 5 (a), Page 2	Environmental and social impact assessment (ESIA) is an instrument...	Environmental and social impact assessment (ESIA) or Environmental, social and health impact assessment (ESHIA)...	We believe it important to use both forms to emphasise both that the Bank is aware of current global practice and that it values ESHIAs, ESHAs, ESHMPs and ESHMFs.
29	ESS1, Annex 1, Point 5 (b), Page 2	Environmental and social audit is an instrument...	Environmental, social and health audit...	We believe it important to use both forms to emphasise both that the Bank is aware of current global practice and that it values ESHIAs, ESHAs, ESHMPs and ESHMFs.
30	ESS1, Annex 1, Point 5 (c), Page 2	Hazard or Risk Assessment Hazard or risk assessment is an instrument for identifying, analyzing, and controlling hazards associated with the presence of dangerous materials and conditions at a project site. The Bank requires a hazard or risk assessment for projects involving certain inflammable,	This whole point should be removed and replaces with something along the following lines:  Health impact assessment is a combination of procedures, methods and tools that systematically judges the potential, and sometimes unintended,	We believe it is now not appropriate to focus only on hazard or risk assessment. The assessment of community health impacts needs to be within the framework of health impact assessment with health risk or hazard assessment as one part of

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		<p>explosive, reactive, and toxic materials when they are present in quantities above a specified threshold level. For certain projects, the environmental and social assessment may consist of the hazard or risk assessment alone; in other cases, the hazard or risk assessment forms part of the environmental and social assessment.</p>	<p>effects of a policy, plan, programme or project on the health of a population and the distribution of those effects within the population. HIA identifies appropriate actions to manage those effects.</p> <p>Health risk or hazard assessment is an established term for methodologies that aim to provide a quantitative assessment of the adverse health impacts of population exposure to single or multiple hazards, and in particular environmental and occupational exposure to chemical pollutants released or transferred into the air, water and soil and their direct physical health impacts. HIA includes health risk assessment as one of its component parts.</p>	<p>that assessment.</p> <p>We also believe it is inappropriate to use the phrase “...For certain projects, the environmental and social assessment may consist of the hazard or risk assessment alone...”.</p> <p>See <a href="http://bit.ly/1wABWaz">http://bit.ly/1wABWaz</a></p>
31	ESS1, Annex 1, Point 5 (e), Page 2	Environmental and social management plan (ESMP) is an instrument...	Environmental and social management plan (ESMP) or Environmental, social and health management plan (ESHMP) is an instrument...	We believe it important to use both forms to emphasise both that the Bank is aware of current global practice and that it values



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				ESHAs, ESHAs, ESHMPs and ESHMFs.
32	ESS1, Annex 1, Point 5 (f), Page 2	Environmental and social management framework (ESMF) is an instrument...	Environmental and social management framework (ESMF) or Environmental, social and health management framework (ESHMF) is an instrument...	We do not think there is established use of this suggested term currently, though it is we believe there implicitly, but we believe for consistency that it is important to explicit state this variant.
33	ESS1, Annex 1, Point 5 (i), Page 3	Strategic Environmental and Social Assessment (SESA) is a systematic examination...	Strategic Environmental and Social Assessment (SESA) or Strategic Environmental, Social and Health Assessment (SESHA) is a systematic examination...	We do not think there is established use of this suggested term currently, though it is we believe there implicitly, but we believe for consistency that it is important to explicit state this variant.
34	ESS1, Annex 1, Point 6, Page 3	Specific features of a project may require the Borrower to utilize specialized methods and tools for assessment, such as a Resettlement Plan, Livelihood Restoration Plan, Indigenous Peoples Plan, Biodiversity Action Plan, Cultural Heritage Management Plan, and other plans as agreed with the	Specific features of a project may require the Borrower to utilize specialized methods and tools for assessment, such as a Resettlement Plan, Livelihood Restoration Plan, Indigenous Peoples Plan, <b>Health Management Plan</b> , Biodiversity Action Plan, Cultural Heritage	Important to explicitly mention community health and a health management plan as a specific example.

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		Bank.	Management Plan, and other plans as agreed with the Bank.	
35	ESS1, Annex 1, Point 7(f), Page 4	Identify measures to reduce risks and impacts in accordance with the mitigation hierarchy set out in ESS1, para 25. Where complex or multiple measures and actions are needed to control risks, including those that are the subject of ESS 5 or ESS7, stand-alone plans may be required to ensure the project meets the ESSs.	Identify measures to reduce impacts in accordance with the mitigation hierarchy set out in ESS1, para 25. Where complex or multiple measures and actions are needed to control impact, including those that are the subject of ESS4, ESS5 or ESS7, stand-alone plans may be required to ensure the project meets the ESSs.	Include mention of ESS4
36	ESS1, Annex 1, Point 7(g), Page 4	Where adverse impacts are anticipated to fall disproportionately on disadvantaged or vulnerable individuals or groups, measures and actions should be identified and adopted to prevent such disproportionate impacts. These measures and actions will take into account any group which, by virtue of (for example) age, gender, ethnicity, religion, physical or mental disability, social or civic status, sexual orientation, gender identity, economic disadvantages or indigenous status, and/or dependence on unique natural resources...	Disadvantaged, vulnerable or <b>sensitive</b> refers to those who, by virtue of, for example, their age, gender, <b>indigenous status or ethnicity, religious spiritual or other beliefs, physical or mental impairment, health status, social or civic status, sexual orientation, gender identity, economic disadvantages and/or dependence on unique natural resources</b>	See PhD Suggested Wording and Comment No 23

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37	ESS1, Annex 1, Points 12 and 13, Page 5	<p>Where subprojects are classified as High Risk, the environmental and social assessment will be consistent with ESSs 1 to 8 and ESS10, including this Annex.</p> <p>Where a subproject is classified as High Risk, the environmental and social assessment will be consistent with ESSs 1 to 8 and ESS10, including this Annex.</p>	Remove this sentence from the Point as not needed and conflicts with the direction of the rest of the guidance that ESSs should be considered for all projects and sub-projects.	See PhD Suggested Wording and Comment No 25
38	ESS1, Annex 1, Point 17 (D), Page 7	Based on current information, assesses the scope of the area to be studied and describes relevant physical, biological, and socioeconomic conditions, including any changes anticipated before the project commences.	Based on current information, assesses the scope of the area to be studied and describes relevant physical, biological, <b>community health (including but not limited to healthcare and medical services)</b> and socioeconomic conditions, including any changes anticipated before the project commences.	Making community health a more explicit issue that should be considered in baseline data collection.
39	ESS1, Annex 1, Point 17 (Ea), Page 7	Environmental risks and impacts, including: (i) those defined by the EHS;G; (ii) those related to community health and safety, including those issues specifically identified in ESS4 (including dam safety and safe use of pesticides); (iii) those related to climate change and	Environmental impacts, including: (i) those identified in the World Bank Group Environmental, Health, and Safety Guidelines (EHS;G); (ii) changes to community health, safety and well-being; (iii) changes to worker health, safety and well-being; (iv) those related to climate change and other	<p>See PhD Suggested Wording and Comment Nos 10 and 22.</p> <p>Bank Draft Point 4a, Point 5 and Point 26a (and ESS1:Annex1 Point 17E(a)) should be aligned.</p>

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		other transboundary or global impacts; (iv) any material threat to the protection, conservation, maintenance and rehabilitation of natural habitats and biodiversity; and	transboundary or global impacts; (v) any material threat to the protection, conservation, maintenance, rehabilitation, improvement and increase of natural habitats and biodiversity; and (vi) those related to the use of living natural resources, such as fisheries and forests;	
40	ESS1, Annex 1, Point 17 (Eb), Page 7	Social risks and impacts, including: (i) threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence; (ii) risks that project impacts fall disproportionately on disadvantaged or vulnerable groups; (iii) any prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits, particularly in the case of disadvantaged or vulnerable groups ; (iv) negative economic and social impacts relating to the involuntary taking of land or restriction on access to natural resources, including as set out in ESS5 (including physical displacement and	Social impacts, including: (i) the distribution of beneficial and adverse impacts; (ii) changes to the health, safety and well-being of affected communities; (iii) changes to the health, safety and well-being of workers (iii) threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence; (iii) impacts falling disproportionately on disadvantaged or vulnerable groups; (iv) any prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits, particularly in the case of disadvantaged or vulnerable groups; (v) involuntary taking of land or restriction on access to natural	See PhD Suggested Wording and Comment Suggested Wording and Comment Nos 11 and 23.  Bank Draft Point 4b and Point 26b (and ESS1:Annex1 Point 17E(b)) should be aligned.

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		economic displacement); (v) risks or impacts associated with land and natural resource tenure and use, including (as relevant) potential project impacts on local land use patterns and tenurial arrangements, land access and availability, food security and land values, and any corresponding risks related to conflict or contestation over land and natural resources; (vi) impacts on the health, safety and well-being of workers and project-affected communities; and (vii) risks to cultural heritage	resources; (vi) changes in land and natural resource tenure and use, land use patterns and tenurial arrangements, land access and availability, food security and land values, and conflict or contestation over land and natural resources; and (ix) damage to cultural heritage.	
41	ESS1, Annex 1, Point 20 (D), Page 13	Community health, safety and security as it relates to the project or activities, including summary of incidents and grievances	Should be above the Occupational health and safety point (this is 6 <sup>th</sup> bullet point, community health should be 6 <sup>th</sup> with occupational health being the 7 <sup>th</sup> bullet)	Nice to see a reference to community health that is separate from occupational health. We believe it is important to prioritise community health and safety and move it up above occupational health and safety.
<b>ESS1: ANNEX 2: ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN</b>				
42	ESS1, Annex 2,	...the ESCP will refer to other plans, either plans that already exist or plans to	...the ESCP will refer to other plans, either plans that already exist or plans	Important to explicitly mention community health and a health

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	Point 4, Page 1	be prepared (e.g. an ESMP, a resettlement plan, a hazardous waste plan) which set out detailed project requirements...	to be prepared (e.g. an ESMP, <b>a health management plan</b> , a resettlement plan, a hazardous waste plan) which set out detailed project requirements...	management plan as a specific example.
43	Annex 2, Point 1.1, Page 4	Establish a Project-level environmental, social, health and safety (ESHS) department/ organization/unit, including specifically qualified person(s) responsible for occupational health and safety, environmental and social performance, and consultation.	Establish a Project-level environmental, social, health and safety (ESHS) department/ organization/unit, including specifically qualified person(s) responsible for community health, safety and well-being; occupational health safety and well-being; environmental and social performance; and consultation.	Important to explicitly mention community health given the mention of occupational health and safety.  Use of health, safety and well-being in line with other parts of the bank Draft where this phrasing has been used.
44	Annex 2, Point 1.3, Page 5	Develop timeline for finalization of individual management plans identified in the ESMP...	Develop timeline for finalization of individual management plans identified in the Environmental and Social Management Plan or Environmental, Social and Health Management Plan...	See PhD Suggested Wording and Comment Nos 31, 32 and 33.
45	Annex 2, Point 1.3, Page 5	The following plans will be prepared [what follows are examples of possible plans]: - OHS plan - Contractor management plan - Work camp management plan - Emergency preparedness and response	The following plans will be prepared [what follows are examples of possible plans]: - Health management plan (Community HMP) - Occupational Health and Safety (OHS) plan	

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		plan - Erosion control plan - Site rehabilitation plan - Remediation plan for existing activities/site - Air and water quality management plans - Waste and hazardous materials management plan - Explosives management plan - Noise and vibration management plan - Biodiversity survey plan	- Contractor management plan - Work camp management plan - Emergency preparedness and response plan - Erosion control plan - Site rehabilitation plan - Remediation plan for existing activities/site - Air and water quality management plans - Waste and hazardous materials management plan - Explosives management plan - Noise and vibration management plan - Biodiversity survey plan	
46	Annex 2, Point 4.1-4.5, Page 15-17	Develop Emergency Response Plan based on the Risk Hazard Assessment dated [ ]. Review and update plan based on operational experience. See 10.2 below for consultation.  Train workers as to how they interact with local communities, and enforce requirements so as to minimize disruption on local communities created by workers.	Develop and implement program to work with local authorities to build institutional and infrastructure capacity to deal with issues arising from influx of workers and others. Key issues relate to the prevention and management of the following main health outcomes: Communicable Disease Non-Communicable Disease Physical Injury Nutritional Disorders	We would like to do more thinking on this but as a start point it is important to focus on broader health aspects under the following headings:  Communicable Disease Non-Communicable Disease Physical Injury Nutritional Disorders Mental Health and Well-being

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		<p>Develop and implement noise and vibration management plan to avoid disturbance of local communities. The plan will require limited afterhours and weekend traffic and other activities whose noise and vibration could affect communities.</p> <p>Develop and implement a road safety management plan to address the impacts on local communities of moving construction equipment and the transport of workers to the site.</p> <p>Develop and implement program to work with local authorities to build institutional and infrastructure capacity to deal with issues (housing, disease, health care, etc.) arising from influx of workers and others.</p>	<p>Mental Health and Well-being</p> <p>The above is likely to link into developing and improving the delivery of public and private services e.g. housing, utilities, health and social care services, local food production and food outlets. These are described as the social determinants of health and wellbeing.</p> <p>Train workers as to how they interact with local communities, and enforce requirements and provide a range recreational and leisure opportunities for workers so as to minimize disruption on local communities created by workers.</p> <p>Develop and implement noise and vibration management plan to avoid disturbance of local communities. The plan will require limited afterhours and weekend traffic and other activities whose noise and vibration could affect communities.</p>	<p>Health and Social Care Services</p> <p>The environmental and social determinants of health and well-being.</p>



PhD No	Point & Page No	Current Wording	Suggested Wording	Explanatory Note and/or Justification
			<p>Develop and implement a road safety management plan to address the impacts on local communities of moving construction equipment and the transport of workers to the site.</p> <p>Develop Emergency Response Plan based on the Risk Hazard Assessment dated [ ]. Review and update plan based on operational experience. See 10.2 below for consultation.</p>	
<b>ESS4: COMMUNITY HEALTH AND SAFETY</b>				
47	ESS4, Point 1, Page 46	ESS4 recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration or intensification of impacts due to project activities.	ESS4 recognizes that project activities, <b>workers</b> , equipment, and infrastructure can generate both beneficial and adverse community health impacts. In addition, communities that are already subjected to <b>social and environmental health burdens</b> , <b>and</b> the impacts from climate change, may also experience an intensification and acceleration of impacts due to the project.	
48	ESS4,	ESS4 addresses the health, safety, and	ESS4 addresses the <b>health, safety,</b>	

PhD No	Point & Page No	Current Wording	Suggested Wording	Explanatory Note and/or Justification
	Point 2, Page 46	security risks and impacts on project-affected communities and the corresponding responsibility of Borrowers to avoid or minimize such risks and impacts, with particular attention to vulnerable groups.	<b>security and well-being</b> impacts on affected communities and the corresponding responsibility of Borrowers to avoid, minimize, <b>mitigate and/or compensate for</b> such impacts, with particular attention to indigenous peoples, <b>disadvantaged, vulnerable and sensitive</b> groups. <b>This includes both communities near a project and distant communities who are affected by transport, waste and worker movements generated by a project.</b>	
49	NA	NA – New Point	New Point (Point 4):  Provide definitions for Health, Health Equity and Inequalities.  <u>Health</u> Health is a state of complete physical, social and mental wellbeing and not simply the absence of disease or infirmity. World Health Organization. (1948). Preamble to the Constitution of the	

PhD No	Point & Page No	Current Wording	Suggested Wording	Explanatory Note and/or Justification
			<p>World Health Organization as adopted by the International Health Conference. New York, 19-22 June 1946, and entered into force on 7 April 1948.</p> <p><u>Health Inequalities</u>            Health inequalities can be defined as differences in health status or in the distribution of health determinants between different population groups.  <a href="http://bit.ly/1DrauJe">http://bit.ly/1DrauJe</a></p> <p><u>Equity</u>            Equity is the absence of avoidable or remediable differences among groups of people, whether those groups are defined socially, economically, demographically, or geographically. Health inequities therefore involve more than inequality with respect to health determinants, access to the resources needed to improve and maintain health or health outcomes. They also entail a failure to avoid or overcome inequalities that infringe on fairness and human rights norms.</p>	

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			<p><a href="http://bit.ly/1EDaSso">http://bit.ly/1EDaSso</a></p> <p><u>Determinants of health</u>                      Many factors combine together to affect the health of individuals and communities. Whether people are healthy or not, is determined by their circumstances and environment. To a large extent, factors such as where we live, the state of our environment, genetics, our income and education level, and our relationships with friends and family all have considerable impacts on health, whereas the more commonly considered factors such as access and use of health care services often have less of an impact.</p> <p><a href="http://bit.ly/1vP5v7D">http://bit.ly/1vP5v7D</a></p>	
50	ESS4, Objective 1, Page 46	To anticipate and avoid adverse impacts on the health and safety of the affected communities during the project life-cycle from both routine and non-routine circumstances.	To anticipate, avoid, minimize, mitigate and/or compensate for adverse impacts as well as enhance and maximise the beneficial impacts on the health, safety and well-being of affected communities during the project life-cycle from both routine and non-routine circumstances.	

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51	ESS4, Objective 2, Page 46	To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the affected communities.	To ensure that the safeguarding of workers and property is carried out in a manner that avoids, minimizes and mitigates impacts to affected communities.	
52	ESS4, Point 5, Page 46	This ESS addresses potential risks and impacts to affected communities from project activities. Occupational health and safety requirements for workers are set out in ESS2, and environmental standards to avoid or minimize impacts on human health and the environment due to ongoing or pre- existing pollution are set out in ESS3	This ESS addresses potential impacts to affected communities from project activities, workers, equipment and infrastructure. Occupational health and safety requirements for project workers are set out in ESS2, and environmental standards to avoid, minimize and mitigate impacts on human health and the environment due to ongoing or pre-existing pollution are set out in ESS3	
53	ESS4, Point 6, Page 46	The Borrower will evaluate the risks and impacts to the health and safety of the affected communities during the project life-cycle and will establish preventive and control measures consistent with applicable international conventions and protocols, national legal requirements and in their absence, GIIP, such as, in the first instance, the EHSGs or other internationally recognized sources. The Borrower will identify risks and impacts	The Borrower will <b>assess the beneficial and adverse impacts</b> to the health, safety and well-being of affected communities during the project life-cycle. For adverse impacts, the project will establish preventive and control measures consistent with applicable international conventions and protocols, national legal requirements and in their absence, GIIP, such as, in the first instance, the EHSGs	Important to focus on both the positives and negatives.

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		and propose mitigation measures in accordance with the mitigation hierarchy.	or other internationally recognized sources. The Borrower will identify adverse impacts and propose mitigation measures in accordance with the mitigation hierarchy. <b>The Borrower will wherever possible seek to promote health equity and maximise the beneficial health impacts of a project.</b>	
54	ESS4, Requirements,	ESS4 Requirements are divided into two sections: A) Community Health and Safety and B) Security Personnel. Section A is further divided into infrastructure design and safety; product and services safety; traffic and road safety; impacts on the environment; community exposure to disease; hazardous materials management and safety; emergency preparedness and response; These topics could be complemented by additional ones.		World Bank (1997) Environmental Sourcebook Update No 18 Health Aspects of Environmental Assessment where it is clearly stated that many EAs do not adequately include health issues and suggest communicable diseases, non-communicable diseases, injuries and malnutrition (though it does not mention mental health and wellbeing)
55	ESS4, Requirements, A		Improving ESS4 Requirements The ESS4 section on “Requirement” could be further developed and include a section on “Assessment of Risks and	

PhD No	Point & Page No	Current Wording	Suggested Wording	Explanatory Note and/or Justification
			<p>Impacts” (same as ESS6, page 68). This section would further clarify how an environmental and social assessment would be considered in compliance with ESS4. Important features would include:</p> <p>Through the environmental and social assessment, the Borrower will identify the impacts on the health of affected communities, in line with good international practice.</p> <p>The assessment undertaken by the Borrower will include consideration of impacts on community health from changes to the environmental and social determinants of health due to a project.</p> <p>The extent of the assessment will be sufficient to characterize the impacts, based on their likelihood and their significance and severity, and reflect the concerns of potentially affected communities and, where relevant, other stakeholders e.g. local and national public and environmental health officials</p>	

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			<p>and experts.</p> <p>The Borrower’s assessment will include baseline conditions to a degree that is proportional and specific to the anticipated impacts. In planning and undertaking community health related baseline and impact assessments, the Borrower will refer to the EHSGs and other relevant GIIP, utilizing desktop and field-based approaches as required.</p> <p>Where further investigations are needed on the significance of potential impacts, the Borrower will carry out additional studies and/or monitoring before undertaking any project-related activities that could cause adverse impacts to communities.</p> <p>Where applicable, the assessment will consider the specificities of community health impacts on indigenous peoples, and other disadvantages, vulnerable and sensitive groups.</p> <p>Where the assessment has identified</p>	



PhD No	Point & Page No	Current Wording	Suggested Wording	Explanatory Note and/or Justification
			<p>potential impacts to community health, the Borrower will manage these impacts in accordance with the mitigation hierarchy and GIIP.</p> <p>The Borrower will also adopt a precautionary approach and apply adaptive management practices in which the implementation of mitigation and management measures are responsive to changing conditions and the results of project monitoring.</p>	
56	ESS4, Point 18, Page 48	<p>Because the project’s direct impacts on the environment may result in adverse health and safety risks to and impacts on affected communities, the Borrower will identify those potential risks and impacts and, where appropriate and feasible, consider how these may be exacerbated by climate change. Adverse impacts will be avoided, but if they are unavoidable, the Borrower will implement appropriate mitigation measures.</p>	<p>Because the project’s direct impacts on the environment may result in adverse health, safety and well-being impacts on affected communities, the Borrower will identify those potential impacts and, where appropriate and feasible, consider how these may be exacerbated by <b>social and environmental health burdens and</b> climate change. Adverse impacts will be avoided, but if they are unavoidable, the Borrower will implement appropriate minimization, mitigation and compensation measures. <b>The Borrower will wherever</b></p>	

PhD No	Point & Page No	Current Wording	Suggested Wording	Explanatory Note and/or Justification
			<p><b>possible seek to promote health equity and maximise the beneficial health impacts arising from the a project’s impact on the environment.</b></p>	
57	ESS4, Point 19, Page 48	<p>The Borrower will avoid or minimize the potential for community exposure to water-borne, water-based, water-related, and vector-borne diseases, and communicable diseases that could result from project activities, taking into consideration differentiated exposure to and higher sensitivity of vulnerable groups. Where specific diseases are endemic in communities in the project area, the Borrower is encouraged to explore opportunities during the project life-cycle to improve environmental conditions that could help minimize their incidence.</p>	<p>The Borrower will avoid, minimize, mitigate and/or compensate for the potential for community exposure to <b>communicable diseases</b> (water-borne, water-based, water-related, and vector-borne), non-communicable diseases, physical injury and disability, nutritional disorders and mental health disorders that could result from project activities <b>and worker influx</b>. The assessment should take into consideration the differentiated exposure to and higher sensitivity of <b>indigenous peoples and other disadvantaged and vulnerable groups. Where specific communicable diseases, non-communicable diseases, physical injury and disability, nutritional disorders and mental health</b></p>	

PhD No	Point & Page No	Current Wording	Suggested Wording	Explanatory Note and/or Justification
			<b>disorders</b> are endemic in communities in the project area, the Borrower is encouraged to explore opportunities during the project life-cycle to improve environmental and social conditions that could help minimize their incidence.	
58	ESS4, Point 20, Page 48	The Borrower will take measures to avoid or minimize transmission of communicable diseases that may be associated with the influx of temporary or permanent project labor.	The above suggested wording of Point 19 would enable this Point to be removed.	IT is important to have a holistic view of the potential health and well-being impacts.
59	ESS4, Point 21, Page 49	The Borrower will avoid or minimize the potential for community exposure to hazardous materials and substances that may be released by the project. Where there is a potential for the public (including workers and their families) to be exposed to hazards, particularly those that may be life- threatening, the Borrower will exercise special care to avoid or minimize their exposure by modifying, substituting, or eliminating the condition or material causing the potential hazards.	Should it be avoid, minimize and/or mitigate? For example See Point 22 below Point 21, Page 48.	The issue here is how realistic and minimal is minimization.
60	ESS4, Point 23,	Borrowers engaged in projects having the potential to generate emergency events5	Borrowers engaged in projects having the potential to generate emergency	

PhD No	Point & Page No	Current Wording	Suggested Wording	Explanatory Note and/or Justification
	Page 49	will conduct a Risk Hazard Assessment (RHA), as part of the environmental and social assessment undertaken pursuant to ESS1. Based on the results of the RHA, a Borrower will prepare an Emergency Response Plan (ERP) in coordination with the relevant local authorities and the affected community.	events will conduct a Risk Hazard Assessment (RHA) or Health Risk Assessment (HRA), as <b>part of the health impact assessment component</b> of the environmental and social assessment undertaken pursuant to ESS1. Based on the results of the RHA or HRA, a Borrower will prepare an Emergency Response Plan (ERP) in coordination with the relevant local authorities and the affected community.	
61	NA	NA – New Point	Similar to ESS6, Point 9, Page 67  The Borrower will ensure that competent community health/ public health expertise is used to conduct the environmental and social assessment, to assist in the development of a mitigation hierarchy that complies with this ESS, and to verify the implementation of mitigation measures. Where appropriate, the Borrower will develop a Community Health Action Plan.	
62	NA	NA – New Point	Linked to above new point:	

PhD No	Point & Page No	Current Wording	Suggested Wording	Explanatory Note and/or Justification
			<p>Adequately considering, assessing and managing community health impacts to effectively safeguard and improve community health requires an understanding of the links between these factors and health and their explicit and effective inclusion (as appropriate) in the environmental and social assessment. This is best achieved by professionals with community health, public health and health impact assessment expertise.</p>	



# 5 Appendix A: Authors' Biographies





## **Salim Vohra**

Dr Salim Vohra has 22 years of experience in public health medicine in various settings and over 12 years of experience of undertaking health impact assessment (HIA).

He has led HIAs in a range of sectors – economic, energy, health services, housing, transport, regeneration and waste at project and policy levels - either as stand-alone HIAs or ones that were part of environmental and social assessments and strategic environmental assessments/sustainability appraisals. His recent HIAs include High Speed 2, Thames Tideway Tunnel, A6-Manchester Airport Relief Road, gas refining project in Qatar, tight gas fracking project in Ukraine and an oilfield redevelopment in Iraq.

He was lead author for three guides: a Health Scotland HIA guide of greenspace and an international guide on HIA and an occupational health risk assessment guide for the International Council on Mining and Metals.

He led a review for the English Department of Health on how HIA is carried out by government departments '*Putting Health in the Policy Picture*'.

He led the wellbeing stream for the Scottish Governments '*Environmental Determinants of Public Health*' (EDPHiS) research project and was a leading member of the health work package for the European Commission research project '*Improving the Implementation of Environmental Impact Assessment*' (IMP3).

He has worked with the World Health Organization on capacity building and incorporating HIA into environmental assessments.

His educational background is in medicine (MBChB), environmental epidemiology (MSc) and public health policy (PhD). He is an Honorary Fellow of Staffordshire University and Conjoint Lecturer at the University of South Wales for his expertise in HIA. He is also co-Chair of the Health (HIA) Section of the International Association for Impact Assessment and an Editorial Board member for Environmental Impact Assessment Review. He is an Associate of the Faculty of Public Health and member of the Transport and Health Study Group.

## **Filipe Silva**

Filipe is a specialist in public health who has recently moved into the field of health impact assessment, he has a focus on the quantification of health impacts particularly air pollution.

He has undertaken several internships/exchange programs/humanitarian assistance missions abroad in Indonesia, Guiné-Bissau and São Tomé e Príncipe.

He has a Bachelor and Masters in Medicine from the University of Oporto, Portugal and an MSc in Public Health from the London School of Hygiene and Tropical Medicine, University of London.

He is a clinically registered with the Portuguese Medical Association and is a member of the Portuguese Impact Assessment Association and the International Association for Impact Assessment.



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