

## **USG Position on the World Bank Safeguards Approach Paper (September 2012)**

The U.S. government (USG) believes the Bank's safeguard policies are an essential tool for avoiding or mitigating environmental and social risks in Bank-financed projects, and are widely viewed as international best practice. The USG sees the World Bank safeguards review as an opportunity for the Bank to continue its leadership in protecting the environment and project-affected peoples from adverse impacts of Bank-financed projects and programs.

The safeguards have served the World Bank well. At the same time, the 2010 Independent Evaluation Group report on safeguards identified areas for potential improvement, and the approach paper itself identifies issues covered by the International Finance Corporation Performance Standards and emerging areas as meriting consideration. In this context, the USG supports the stated objective of the safeguards review and update, namely "to strengthen the effectiveness of the safeguard policies in order to enhance the development effectiveness of Bank operations," and believes that the Bank has identified important outcomes: a renewed partnership with borrowers, better approaches to addressing environmental and social risks of the next decade; increased effectiveness, efficiency and timeliness; policy harmonization; and alignment with the evolving nature of the Bank's business. In considering these outcomes, the USG would like to highlight the importance it attaches to management's commitment that there will be no dilution of Bank standards.

The USG also believes it will be important for the Bank to be able to articulate how its proposed integrated framework results in greater integration of social and environmental issues, better development outcomes, and improved environmental and social sustainability. This will further allay concerns about potential "weakening" of the safeguards.

The safeguard review is occurring in the context of the Bank's broader Investment Lending (IL) reform. While that process is being handled on a separate track, the USG underscores the importance of sound approaches in IL reform to key issues impacting safeguards effectiveness, such as implementation support, appraisal, and risk assessment.

The USG supports public disclosure of the approach paper and its use as the basis for consultations. It also welcomes the wide-ranging consultation process described in the paper.