

26 October 2011

The World Bank
1818 H Street, NW
Washington, DC 20433
Via email

Re: Draft Operational Policy 9.00 Program for Results Financing

To the World Bank Executive Board:

We, the undersigned organizations, representing over 200 civil society representatives from 51 countries, are gravely concerned and alarmed by the World Bank's draft Operational Policy 9.00 Program for Results (P4R) Financing. We are therefore writing to urge you to reject P4R.

P4R is a new form of financing which could undercut decades of efforts to establish strong social and environmental standards and accountability mechanisms at the World Bank. Under the laudable rubric of providing governments with more flexible financing for health, education and other programs, P4R actually would allow the Bank to fund potentially harmful projects and activities **that specifically would be exempt from complying with most World Bank safeguard policies, including those related to Indigenous Peoples, involuntary resettlement, natural habitats and dam safety, as well as other important policies, including those related to transparency, project supervision and monitoring.**

The draft policy acknowledges that P4R loans could be used to fund activities with significant adverse environmental and community impacts, and even some with irreversible impacts, without application of the safeguard policies. As a result, a P4R loan could, for example, be given to a government for a forest-related program that ultimately results in land-grabbing and Indigenous Peoples rights violations. However, under P4R, World Bank Indigenous Peoples policies would not apply to this loan, nor would normal disclosure standards. And although the draft indicates that the Bank's accountability mechanism could be used for P4R lending, without clear standards at the project level, it is impossible to hold borrowers accountable for complying with those safeguards.

Finally, we note with concern that the P4R draft policy is the latest development in an alarming trend at the World Bank, in which the institution has created numerous forms of financing to which safeguard and accountability standards are very difficult to apply, if not completely exempt. The de facto result is that, today, the environmental and social standards that the Bank has carefully crafted over twenty years apply to an increasingly smaller proportion of Bank lending. P4R will exacerbate this problem by encouraging clients to seek P4R lending as a way of avoiding compliance with and accountability for environmental and social safeguards.

With its sweeping exemptions, the proposed P4R represents the most radical development in this worrying trend towards the dilution of social and environmental safeguards. **For this reason, we urge the Bank Board to reject P4R, and, rather, to make a strong commitment to applying robust safeguards to all types of financing at the World Bank Group.**

Sincerely,

International

ActionAid
Asian Indigenous Women's Network
BankTrack
Basic South Initiative
GAIA - Global Alliance for Incinerator Alternatives
International Trade Union Confederation
International-Lawyers.org
NGO Forum on ADB
Nord-Sud XXI
Tebtebba (Indigenous Peoples' International Centre for Policy Research and Education)
Third World Network

Asia

Focus on the Global South
Jubilee South - Asia/Pacific Movement on Debt and Development

Europe

Friends of the Earth Europe

Argentina

M'Biguá, Ciudadanía y Justicia Ambiental

Austria

Global Responsibility
KOO- Koordinierungsstelle der Österr. Bischofskonferenz f. internationale Entwicklung und Mission

Bangladesh

Bangladesh Krishok Federation
Equity and Justice Working Group Bangladesh (EquityBD)
Unnayan Onneshan
VOICE

Belgium

11.11.11

CNCD-11.11.11

Confédération des Syndicats Chrétiens

Eurodad

LDC Watch

Netwerk Vlaanderen

Bolivia

CEADESC

Brazil

Instituto Terramar

Cambodia

Cambodian Rural Development Team

Community Economic Development (CED)

Cameroon

ADEBAGO (Association pour le Développement des Bagyeli de l'Océan)

Alternatives Durables pour le Développement (ADD)

APED (Appui pour la Protection de l'Environnement et le Développement)

ASBAK (Association des Baka de l'Est Cameroun)

ASTRADHE (Association pour la Traduction, l'Alphabétisation et le Développement Holistique de l'Etre Humain)

Buma'a Kpode

CABURO (Capacity Building and Human Rights Organisation)

CENDEP

Centre for Environment and Development

Centre For Nature Conservation And Development (C.N.C.D-Cameroon)

Centre pour l'Education, la Formation et l'Appui aux Initiatives de Développement au Cameroun (CEFAID)

Cercle d'Appui au Développement Rural (CADER)

CRADIF (Centre Régional d'Appui et de Développement des Initiatives Féminines)

GRIPE (Groupe International pour la Protection de l'Environnement, l'Autopromotion et le Développement)

ONED

PERAD (Organisation pour la Protection de l'Environnement, la Recherche et l'Appui au Développement en Afrique)

ROCAME (Réseau des ONG de Campo Ma'an et Environs)

ROLD (Réseau des organisations Locales du Dja)

Canada

Council of Canadians

Friends of the Earth Canada

Global Association for People and the Environment

London & District Labour Council, Environment Committee

Central African Republic

MEFP

Chile

CODEFF

Colombia

COECO Ceiba-Amigos de la Tierra Costa Rica

Proceso de Comunidades Negras

Red Latinoamericana de Recicladores

REPEM

Cyprus

Friends of the Earth Cyprus

Democratic Republic of Congo

Dignité Pygmée - DIPY

Djibouti

Horn Youth Development Association (HYDA)

El Salvador

Unidad Ecologica Salvadoreña- UNES

CESTA - Friends of the Earth El Salvador

France

ATTAC

Friends of the Earth- France

Gabon

Brainforest

Germany

ARA

Urgewald

Ghana

Volta Basin Development Foundation

India

Bharatiya Krishak Samaj

Environmental Society

Jyothi Welfare Society

mines minerals & PEOPLE

River Basin Friends
Saathi
Save Western Ghats Movement

Indonesia

IESR
KRuHA – Indonesia
Sawit Watch
Yayasan Palung

Italy

CRBM
SONIA

Japan

Japan Center for a Sustainable Environment and Society (JACSES)

Kenya

Jamaa Resource Initiatives

Korea

KFEM/Friends of the Earth Korea

Kosovo

Balkan Investigative Reporting Network

Liberia

Sustainable Development Institute

Mali

IRPAD/Afrique

Mauratania

Mer Bleue

Mexico

ALAMES
Alianza Mexicana por la Autodeterminación de los Pueblos (AMAP)
Centro de Estudios de la Región Cuicateca
Comisión de Derechos Humanos y Laborales del Valle de Tehuacán
Comité 1968 por las Libertades Democráticas
Comité de derechos humanos "Asís"
Derechos Humanos de la Universidad Autónoma de la Ciudad de México
Dialogos Interactivos, A.C
Frente Autentico del Trabajo
Friends of the Earth –Mexico

FUNDAR, Centro de Análisis e Investigación
Grupo Tacuba, A. C.
Guerreros Verdes A.C.
Instituto Intercultural Nõño, A.C.
Kolectivo El Rebelde
Marea Azul AC.
Red de Defensores Comunitarios por los Derechos Humanos
Red Mexicana de Acción Frente al Libre Comercio
Red Mexicana de Acción frente al Libre Comercio (RMALC)
Red Mexicana de Afectados por la Minería REMA
Red Nacional Género y Economía
Secretariado Social Mexicano,a.c.
Unión Popular Valle Gómez

Mongolia

Centre for Human Rights and Development
Civil Society Open Forum

Nepal

All Nepal Women Association
ANPFA
Campaign for Climate Justice, Nepal (CCJN)
Federation of Community Forestry Users, Nepal (FECOFUN)
Human Rights Alliance
Jagaran Nepal
Rural Reconstruction Nepal (RRN)
South Asia Alliance for Poverty Eradication (SAAPE)
Water and Energy Users' Federation-Nepal (WAFED)

Nigeria

Labour, Health and Human Rights Development Centre
Citizens Centre for Integrated Development and Social Rights

Norway

Rainforest Foundation Norway
SLUG - Norwegian Coalition for Debt Cancellation

Pakistan

Pakistan Fisherfolk Forum
Pakistan Kissan Rabita Committee

Peru

Derecho Ambiente y Recursos Naturales DAR

Philippines

Freedom from Debt Coalition

IBON Foundation/ Peoples Movement on Climate Change
Institute for Climate and Sustainable Cities (iCSC)
Jubilee South Asia Pacific Movement on Debt and Development
Migrant Forum in Asia
SANLAKAS Youth

Portugal

Euronatura - Centro para o Direito Ambiental e Desenvolvimento Sustentado

Russia

Friends of the Siberian Forests

Senegal

Lumiere Synergie pour le Developpement

South Africa

350.org

Centre for Civil Society Climate Justice Project, University of KwaZulu-Natal, Durban

Earthlife Africa Jhb

groundWork/Friends of the Earth South Africa

Rosa Luxemburg Foundation

South Durban Community Environmental Alliance

South Sudan

African Foundation

Spain

Amigos de la Tierra

Ecologistas en Acción

Sri Lanka

Swarna Hansa Foundation

Switzerland

Berne Declaration

Timor-Leste

La'o Hamutuk (The Timor-Leste Institute for Development Monitoring and Analysis)

Togo

Jeunes Volontaires pour l'Environnement

Uganda

African Rivers Network

National Association of Professional Environmentalists (NAPE)

Uganda Coalition for Sustainable Development

United Kingdom

Chinadialogue
ClientEarth
Forest Peoples Programme
Friends of the Earth - England, Wales and Northern Ireland
Friends of the Earth Scotland
Global Witness
Nuneaton Friends of the Earth
UK Without Incineration Network
University of Sussex
World Development Movement
WWF-UK

United States

Accountability Counsel
Alliance for Global Justice
Bank Information Center
Bridges Across Borders Cambodia
Center for International Environmental Law
Corporate Accountability International
Daughters of Charity
Dominican Sisters of Hope
Earth Day Network
Earthworks
East Timor and Indonesia Action Network (ETAN)
Eco-Cycle
Faith Action Network of Washington
Friends of the Earth - US
Gender Action
Government Accountability Project
Greenpeace
Haitian-American Grassroots Coalition (HAGC)
Holy Spirit Missionary Sisters, USA, JPIC
Horn Youth Development Association
Institute for Agriculture and Trade Policy
International Accountability Project
International Forum on Globalization
International Rivers
Jubilee Oregon
Maryknoll Office for GLocal Concerns
Mercy Investment Services, Inc.
Missionary Oblates
New Rules for Global Finance
New York Climate Action Group
Oil Change International

Pacific Environment
Quaker Earthcare Witness
Rainforest Action Network
School Sisters of Notre Dame - Shalom North America Coordinating Committee
Sierra Club
Sustainable Energy and Economy Network
Tri-State Coalition for Responsible Investment
'Ulu Foundation
Ursuline Sisters of Tildonk

cc:

Caroline Anstey
Managing Director

Joachim von Amsberg
Vice President, OPCS

Rachel Kyte
Vice President, SDN