

**EIR: some unfinished business**

"We will take your concerns into account," "We will make sure that your points are addressed," "We are looking at this very carefully." World Bank staff had heard their boss James Wolfensohn attempt to placate civil society like this a thousand times, and did not expect him to ever change his tune. But it was not what they heard him say in September 2000 at the Bank's annual meeting in Prague.

To their astonishment, they heard Wolfensohn commit to "looking at the pros and cons" of financing projects in the oil, mining and gas sector. It was the beginning of

the three year Extractive Industries Review (EIR) process that could potentially lead to a major overhaul of the World Bank's lending practices.

For decades, communities have been struggling with the impacts of large scale mines, giant pipelines and major drilling operations. The vast majority of these projects have been carried out without appropriate consultation procedures, producing severe social and ecological disruption around the world. For indigenous peoples, the extractive industries have represented a major threat to their cultural and physical survival, while the effects of pollution and the consequent social burdens have been harsh, especially for women.

As if the local impacts aren't enough, oil projects also seriously affect the global climate, from which the poor will suffer first. The World Bank remains an important public financier of the extractive industries sector and has additionally helped to generate billions of dollars in private funding for the sector through its much sought-after "seal of approval".

For several decades now, people around the world have been voicing their dissent, making it clear that the Bank helps to finance misery and despair. Uprisings, mobilisations, direct meetings with decision-makers and the final confrontation in Prague 2000 led the World Bank to establish the EIR.

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**Is this an independent, far-reaching review I see before me? The World Bank's EIR stage fright**

Campaigners despairing of the age-old fanfare which comes with major World Bank projects (in which NGOs vainly attempt through reference to the real world to counter the claims of the WBG that dams and pipelines are key contributors to human welfare and environmental conservation) would do well to read Larry Lohmann's excellent piece 'Mekong Dams in the Drama of Development' (available at [www.thecornerhouse.org.uk/document/dramadev.html](http://www.thecornerhouse.org.uk/document/dramadev.html)).



The EIR tango - but who gets the soft landing?

"Demanding to know why the World Bank never learns from experience," says Lohmann, "is a little like asking the actor who plays Oedipus why he never seems to catch on

to the fact that the old man he meets at the crossroads in every performance is actually his father, and therefore just goes on

stabbing him night after night." His point is that World Bank projects are performances.

Bank staff know that the script they are reading from has Michael Jackson's grasp on reality, and they know that we know - but the show must go on. As long as the World Bank is writing and directing, even though we are paying the production's costs and giving the show its customary dreadful reviews, it will set the tenor of the performance. To appeal to reality to try and change the show is thus futile. As Lohmann puts it, "one might as well jump up on stage during an amateur performance of *The Tempest* to point out...that Prospero is really just an insurance salesman from Basingstoke dressed up in a wizard suit."

NGOs working on BP's infamous Baku-Tbilisi-Ceyhan (BTC) pipeline know exactly how far invoking reality will get you. We undertook an unprecedentedly detailed analysis of the project's Environmental Impact Assessment over several months, visiting the pipeline several times and wading laboriously through BP's 13,000 pages of documents, to come up with at least 173 violations of the

World Bank's own mandatory Safeguard Policies. The IFC wrote back a little over

a week later saying not a single one of our claims was valid. The UK's Department for International Development didn't even read the report.

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## EIR: some unfinished business

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The three year process has not been without problems. The EIR's terms of reference were biased, it did not have enough money, hired a few wrong people, carried out bad project visits and gave Banksters too much space to talk. From the outset, some NGOs and communities decided not to participate in the EIR consultation as they did not trust the Bank to respond to their concerns – similar consultations have been serious let-downs in the past. A number of other organisations held internal discussions on whether it made sense to continue with the EIR if the Bank continued to be in the driving seat.

When the EIR's eminent person, Professor Emil Salim, ultimately released the EIR report in December, civil society and local communities were pleased that some of their most urgent concerns had been reflected in the document. At the same time, however, many organisations agreed that the recommendations do not go far enough in adequately balancing the interests of those who profit from the extractive

industries and those who are left to deal with the social and environmental ruin these industries tend to leave in their wake.

It hasn't taken long for the oil, gas, and mining division, those responsible for the World Bank Group's lending in the extractive industries, to start attacking the EIR report. The recently leaked draft management response dismisses almost all of Professor Salim's recommendations. The spin emerging is that the report does not represent the consensus of all stakeholders, Bank code for "Let's not, after three years of consultations, upset the apple cart, folks." But the goal of the EIR was to make improvements to World Bank lending – it was not about reaching consensus between all stakeholders. The management's interest in consensus will end when the right to prior informed consent is demanded by affected people. □

- ▶ Regular updates on the EIR:  
[www.eireview.info](http://www.eireview.info)
- ▶ Bankwatch on the EIR:  
[www.bankwatch.org/issues/wb-imf/eir/meir.html](http://www.bankwatch.org/issues/wb-imf/eir/meir.html)

## Renewables 2004 – will the banks engage or switch off?

The beginning of June this year has already been marked in the calendars of a number of governments, businesses and NGO representatives working in the field of energy, and especially renewable energies.

The German government will host the International Conference for Renewable Energies, a follow-up initiative from the 2002 Johannesburg World Summit for Sustainable Development.

One key question for the conference will be how to increase financing in order to stimulate further growth in renewables. To date the development banks which operate in Europe have provided little support for this sector. In the EBRD, EIB and World Bank energy related portfolios, investment in renewables has accounted for 5-6 percent over the last ten years. The recently agreed IFC and EBRD loans for the BTC pipeline will help to produce a quantity of oil that will ultimately contribute 160 million tons of CO2 to the atmosphere every year - or 30 percent of annual CO2 emissions in the UK where the EBRD is based.

All of the banks should therefore be looking closely at one of the EIR's recommendations, namely the long overdue need for the World Bank to develop "... a robust portfolio for renewable energy, aggressively increasing investments in renewable energies by about 20 percent annually and thereby moving toward a

better balance between support for fossil fuel projects, currently 94 percent of the energy portfolio, and renewables projects, currently just six percent."

Changing the banks' policies in this area will not be easy. The development banks have been financing fossil fuel industries for decades now and large oil and gas

percent of the EBRD's energy portfolio. The key question now is how to ensure that renewables and energy efficiency become a central focus for development bank finance.

It will be up to NGOs and the renewables industries to work closely with progressive governments in order to influence the

banks' policies. The political message is clear, as espoused by the European Conference for Renewable Energy's conclusion last month: "Development banks and other international financial institutions, including the European Investment Bank, the World Bank and export credit agencies, should prioritise sustainable energy projects in their funding."

Now the country representatives on the respective bank boards should insist that the presidents of EBRD, EIB and World Bank - Messrs. Lemierre, Maystadt and Wolfensohn - not only mark early June in their cal-

endars for the trip to Bonn, but also that they come with new ambitious targets for investment in renewables and energy efficiency that will help to speed up the much-needed transition in the energy sector. □



"... and oil pipelines don't produce emissions..."

projects provide highly profitable returns. The likes of Shell, BP, ExxonMobil, moreover, do not want to see an end to the project parachutes with which the banks so often oblige them – development bank approval, backed up by public funds, guarantees a veil of legitimacy for big oil's dealings with the corrupt and/or totalitarian regimes that frequently control fossil fuel resources.

Some notable progress has been made by the banks, such as the EIB's 15 percent target for renewables lending, the EBRD's strategic renewable energy assessment of east European countries and its work on energy efficiency that accounts for 10

- ▶ European Renewable Energy Council:  
[www.erec-renewables.org](http://www.erec-renewables.org)
- ▶ Citizens United for Renewable Energy and Sustainability:  
[www.cures-network.org](http://www.cures-network.org)

## Romania's mining woes continue

What to do with an ailing mining sector that between 1990 and 2002 swallowed USD 6 519.7 million in direct subsidies and between 1998 and 2003 got through USD 81 million for mine closure and environmental rehabilitation? What to do about corruption among the highest managerial ranks in the state mining sector? And what to do with the 688 320 people employed in this sector?

The World Bank plays a pivotal role in the management of Romania's mining sector. Most visibly, the bank's mine closure and social mitigation program has been active since 1999, with funds of USD 44 million available.

Once the World Bank mine closure loan was approved back in 1999, the Romanian ministry for Industry and Commerce set up the 'Central Group for Mine Closure'. Its mission has been to implement the ministry's strategy for restructuring the mining sector. Their job is roughly divided into two: mine closure and mine conservation. The preference appears to be for the latter, and Romania currently has more mines under conservation than mines being closed. This trend is likely to increase in the future - for obvious reasons.

Minvest Deva, a state-owned mining company has its headquarters in the town of Deva. From here it controls several mines, including rundown mine operations in the Apuseni Mountains, a resource rich corner deep in Transylvania. The Central Group for Mine Closure has a branch in Deva, and over a three year period spent USD 2 million conserving six mines.

At the national level the Romanian ministry for Industry and Commerce has meanwhile asked the International Bank for Reconstruction and Development for a USD 143.6 million loan for mine closure and environmental rehabilitation. Out of this total amount, USD 37.2 million is to be allocated for mine closure while USD 106.4 million will go on environmental rehabilitation at mines awaiting privatisation. This trend for conserving mines, officially termed 'a commercial basis approach of the mining activity', has now become the top priority in Romanian mining strat-

egy. A closed mine can't be sold, but the World Bank supported strategy is to conserve, superficially enhance and sell some of these monumental Ceausescu era mines to commercial mining buccaneers with little or no experience and few scruples.

Rosia Montana is situated in the Apuseni Mountains. A Minvest Deva owned gold mine is about to close here. However, this is exactly where Gabriel Resources, a junior Canadian mining company founded by a convicted drug dealer, now wishes to develop Europe's largest gold mining operation. The project's controversies are unfortunately now part of the fabric of the local community: the naked corruption which has been taking place; the vehement opposition from local property owners faced with an ongoing illegal resettlement program; the use of cyanide and the 800 hectare tailings pond that will contain hazardous and unstable tailings; and the consequent destruction of Romania's oldest archaeological settlement.

It goes without saying that the proportional increase in World Bank funded mine conservation goes hand in hand with increased private sector involvement. The underlying principle - if not the final outcome - is beautiful. The World Bank provides the Romanian government with loans to close and prepare Romania's mining sector for privatisation. The privatisation windfalls will make everyone happy, including the World Bank whose loans can thus be swiftly repaid.

During a recent meeting in Bucharest between Romania's Agency for Mineral Resources, NGOs and the World Bank, NGOs were presented with a new World Bank loan and mining related project. 'Hazard Risk Mitigation and Emergency Preparedness Project for the Tisza Basin' (HRMEPP) is a USD 196.66 million loan aimed at fixing ailing tailings ponds which are likely to burst at any moment.

While beneficial, the project nonetheless is situated within a vacuum of coherent policies, commitments and strategies. At the meeting NGOs repeatedly asked about Romania's general mining strategy, about how HRMEPP fits into it, what the expected results are and, most importantly, what verifiable indicators (i.e. specific

commitments, policies on the reduction of Acid Rock Drainage or the removal of cyanide from Romania's mining law) the World Bank intends to attach to this loan. Neither the authorities nor the World Bank's representative were willing to provide answers.



Blow me! The song remains the same for Romania's mines

The current transformations within Romania's mining sector and the World Bank Group's apparent refusal to accept the findings of the EIR are based on the same philosophy. Poverty reduction and sustainable development, the World Bank's mandate after all, have become but brand names with a monetary price tag. Those enduring the costs are neither the World Bank nor governments. □

By Stephanie Roth and Stefania Simion

► Rosia Montana campaign:  
[www.rosiamontana.org](http://www.rosiamontana.org)

## World Bank barking up the wrong tree in Georgia

heavals. In the Georgian forestry sector, anarchic wood cutting and illegal timber exporting to neighbouring countries has resulted in the degradation of the forests which cover 40 percent of the country.

As a result, in 1998-1999, the State Department of Forest Management (SDFM) and the Food and Agriculture Organisation of the United Nations (FAO) carried out technical work detailing the aspects of a future project to redevelop the forestry sector. Other financial aid to the sector was provided by the Interna-

Since gaining independence from the Soviet Union, Georgia has suffered political, economic and social up-

tional Development Agency (IDA) of the World Bank through the Project Preparatory Facility (PPF) during 2000-2001. The PPF disbursed USD 0.99 million.

The current World Bank project, the Forests Development Project (FDP), was approved by the Georgian government in 2002 and is intended to be implemented throughout 2002-2009. The credit provided by the IDA amounts to USD 15.7 million. The Georgian FDP has two main objectives "... to establish sound forest management systems that maximise the contribution of Georgia's forests to economic development and rural poverty reduction on an environmentally sustainable basis."

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**World Bank barking up the wrong tree in Georgia**

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Although it favours commercial harvesting in Georgia, within the remit of the FDP there has been no study carried out to assess whether such harvesting will indeed contribute to the economic growth of the country. Within this commercial harvesting focus, and carrying a USD 1.98 million budget, there is an emphasis on building "main forest roads and light roads" for access to firewood which is described as a means of "environmental forest harvesting".



"Getting this out of the country should be no problem"

However, Georgian forests do have a protective function against floods and soil erosion which ought to make reforestation a top priority. This would re-enhance the forests to a state in which suitable use of them could significantly contribute to economic growth. An increase in domestic wood processing resulting in local employment, the promotion of eco-

tourism and a decrease in illegal logging would all be major boons.

The poverty reduction goal of the World Bank financed FDP is also currently failing to materialise. The project's implementation has been rather slow and there are a number of shortcomings. For example, it is difficult to conceive of how Georgian forests can be seen to have improved without an initial assessment of their condition to compare against. Also, to date, no overall economic valuation of Georgian forests has been ascertained.

The inconsistency of the actions taken thus far alongside the real neglected needs of the Georgian forestry sector indicate the pressing need for a National Forest Policy (NFP). This should be the responsibility of the Georgian parliament and currently only a very brief statement from the government exists: "Main Principles of Government Policy for Georgia's Forest Sector Development in 2002-2010" was written in 2002. The lack of such a key strategy document, to guide and inform the FDP, is resulting in total chaos for the project's implementation. The project should be halted until a thorough NFP is elaborated and adopted.

It's equally puzzling to note that the World Bank welcomed the creation and approval of the Forest Sector Rationalisation and Institutional Development Plan - part of the project's first component - before the more urgent NFP was tackled. When the NFP comes into being, there is a possibility that the Forest Sector Rationalisation and Institutional Development Plan may be rendered useless if it turns out to be non-compliant with the principles set out in the NFP.

Thus, several lingering doubts remain about whether the project can or will deliver on its intended aims given both the way its implementation priorities have been set and the way it is currently proceeding. Yet another wasted credit looms, this time with a price tag of USD 15.7 million. Should the government and Georgia's beleaguered taxpayers have to pick up the tab as usual? □

**EBRD returns to Sakhalin**

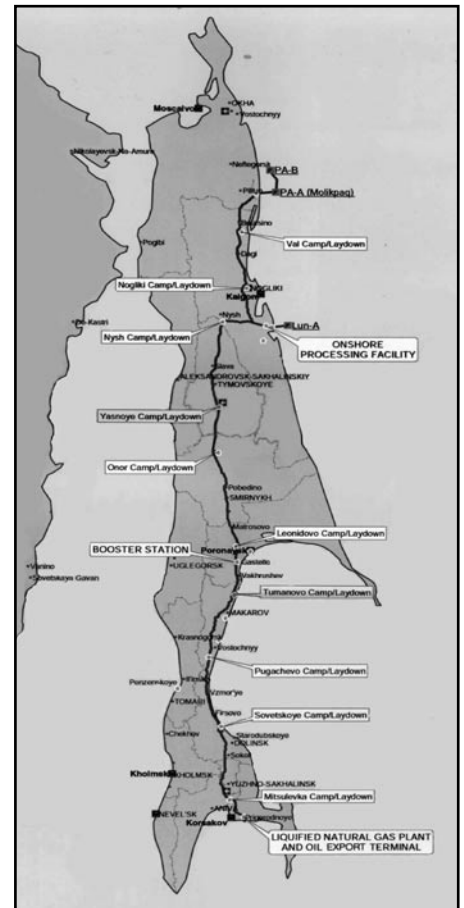
In 1998 the European Bank for Reconstruction and Development (EBRD) provided an important USD 116 million loan for phase 1 of the Sakhalin II oil and gas project located offshore of the Russia's Sakhalin island. The bank justified the loan by arguing that the project would bring economic development to the Sakhalin island and introduce environmentally sensitive oil production techniques to the Russian Federation. Were such claims borne out?

The Russian Federation signed a Production Sharing Agreement (PSA) with Sakhalin Energy Investment Company Ltd. in 1994 regarding the development of the Lunskoye and Piltun-Astokhskoye oil and gas fields. The Bermuda-based Sakhalin Energy was formed by three key players: Royal Dutch/Shell, Mitsui Co. and Mitsubishi Corp. At the time of signing the PSA, Shell was busy appeasing Nigerian farmers enraged about missing oil revenues and inadequate compensation for environmental degradation. Mitsui and Mitsubishi, meanwhile, were the objects of an international boycott following their investment ties with the military regime in Burma.

Such cases do not register for long in the world of high finance. The promise of huge revenue flows coming from Sakhalin oil and gas had attracted the attention of the international financial institutions. In 1997 the EBRD voted to provide funding (the aforementioned USD 116 million) for the construction of the 'Molikpaq' oil platform in the Sea of Okhotsk. It was not alone: the Overseas Investment Corporation and the Export-Import Bank of Japan (JEXIM) – US and Japanese export credit agencies – decided to contribute equal tranches.

The EBRD's support was granted even though the project's environmental impact assessment (EIA) violated international EIA standards. As the PSA overrides Russian legislation, the environmental standards were also left by the wayside. The EIA skated over weak prevention and mitigation measures in case of oil spills, its seismic testing was unsatisfactory and it permitted the discharge of untreated production and drilling waste into the sea. What's more, the EIA for the Sakhalin project did not consider the cumulative impact on the marine and coastal areas.

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## Is this an independent, far-reaching review I see before me? The World Bank's EIR stage fright

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So the search has long been on for alternatives: other ways to tell the story, amend the script, create a new performance on a different stage.

One of the main methods has been to bring in new protagonists. We have taken the campaign into the law courts: cases are pending in the European Court of Justice, the European Court of Human Rights and the Georgian civil courts. We have taken the show to new venues: by forcing the release of the legal framework of the BTC project, the Host Government Agreements, we have initiated discussion amongst a wide range of lawyers and NGOs, not specifically interested in BTC, about the implications of this kind of corporate colonialism in the developing world.

But there is nothing so effective in changing a performance as getting the bad guys to mess up their lines. In that, we are helped no end by BP's hubris and arrogance: the latest revelations about alleged procurement fraud and cover-up of 15,000 leaking joints along the pipeline come from former BP employees with integrity, angered at how ineptly their paymasters work and how flagrantly they have gone back on their promises.

And that is where the Extractive Industries Review comes in. Reading Emil Salim's recommendations that the World Bank gets out of oil and gas in four years, that it stick to the laws and policies it is supposed to stick to and that the free prior and informed consent of affected people is essential, is

like watching Iago grab the pillow from Othello's hands and then proceed to give him the number for relationship counselling. It breaks the suspension of disbelief. It forces the bank to acknowledge the ludicrous artifice and palpable untruth of what they say and do.

What is notable about the EIR is that it makes clear that the WBG does not operate in the service even of the free market ideology its critics often accuse it of. Its policies, the Review notes, "did nothing to ensure the creation of competition, efficiency gains, development of a domestic private sector or environmentally and socially sound development strategies for the extractive sectors." The bank's main function is political; most of all, the bank implements policies and projects that are politically desired, particularly by the US, and massively subsidises sectors and corporations that are politically important, particularly to the US.

BTC is the epitome of this. It will never pass the criteria set by the EIR, it brings no benefits to affected people, it has produced the first dynastic transfer of power in the post-Soviet states and encouraged corruption, military build-up and corporate colonialism. It serves only American political interests, and nakedly so, however thick BP's layers of greenwash.

Giving the audience what it wants is a standard for our times. The majority in the cheap seats have made their feelings clear via the EIR. Let's see where the show goes from here. □

By Anders Lustgarten

► BTC campaign:  
[www.baku.org.uk](http://www.baku.org.uk)  
► Bankwatch BTC campaign:  
[www.bankwatch.org/issues/oilclima/baku-ceyhan/mbaku.html](http://www.bankwatch.org/issues/oilclima/baku-ceyhan/mbaku.html)

## EBRD returns to Sakhalin

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Since extraction began, vital herring and saffron cod populations have declined and critically endangered Pacific gray whales, seasonal visitors to Sakhalin waters, have been losing weight. Subsistence fishing, an integral part of life for the majority of Sakhalin families, has been jeopardized. There are very real prospects that this project's sharp development practices will negatively affect the world fishing industry - in 1999 East Sakhalin supplied 45 percent of the pink salmon and 38 percent of the seaweed harvest at the Russian Far East market.

Phase 2 of the Sakhalin II project has been planned because of the area's extremely harsh climate - the frozen winter sea prevents standard oil tanker transportation for six months of the year.

To allow operations to continue all year round, Sakhalin Energy decided that 800 kilometre long parallel pipelines are necessary for transferring the oil and gas from Aniva Bay in the north to the ice free ports in the south of the island.

The pipelines are to be buried in a trench roughly 1 metre deep and are set to cross 126 kilometres of swamps, 110 kilometres of mountainous areas and more than 1 000 rivers. In addition to this, the promoters plan to install another offshore oil and gas platform at the Piltun-Astokhscoe field and a gas platform at the Lunskeye field. To complete the harmonious picture, a liquefied natural gas plant as well as oil and liquified gas export terminals are to be built in the village of Prigorodnoye.

Local people and environmentalists have been alarmed by the news that the EBRD is again considering funding for the project. Having seen the impacts of phase one, they are sceptical about the EBRD's ability to deliver on its promises of economic, social and environmental benefits. Such scepticism is especially warranted when the oil and gas pipelines are due to traverse a seismically volatile island, and one which hosts rich spawning grounds for salmon. Put simply the whole ecosystem will be put under great risk unless the EBRD is able to use its influence to prevent Sakhalin Energy from cutting corners, as it currently seems hell bent on doing, for a second time. □

► Sakhalin II campaign at SEW website:  
[www.sakhalin.environment.ru/en](http://www.sakhalin.environment.ru/en)  
► Pacific Environment on Sakhalin II:  
[www.pacificenvironment.org/russia/sakhalin.htm](http://www.pacificenvironment.org/russia/sakhalin.htm)  
► ECA Watch on Sakhalin II:  
[http://www.eca-watch.org/problems/russia/sakh2\\_index.html](http://www.eca-watch.org/problems/russia/sakh2_index.html)



Mining and oil investments: star attractions at this year's Flat Earth summit



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## EIB gets away with it - again

As the conclusions of the Extractive Industries Review were being finalised recently, the European Investment Bank was doing its level best to demonstrate how out of touch with the concerns of affected communities and indigenous peoples it can be.

On January 27, the bank's board of directors approved a EUR 56 million loan for the Sepon Copper project, a copper mine development in Laos being run by Australian mining company Oxiana Limited. Concerted international NGO pressure about the project late last year appeared to affect the EIB, as the funding decision scheduled for December was postponed. As with all the projects which come up for EIB board consideration – more than 300 of them are assessed at a mere ten board meetings throughout the year – Sepon got the all clear.

An enduring puzzle in this project's history is how the EIB did in fact get invited to participate in the first place. Oxiana initially requested financing from the International Finance Corporation, but decided to withdraw its request. Did the company balk at the terms of the IFC's environmental and social requirements, significantly higher than those of the EIB's, and decide to go for a much more convenient finance option?

The EIR asserts that projects like Sepon do not

alleviate poverty and should not be eligible for public support. In countries like Laos, where there is very weak governance and where the administration has a dismal human rights record, extractive industry projects often mean more harm than good for the population. With this in mind, the EIB's involvement becomes yet more troubling.



"From my point of view, it's always been project approval first, impact assessment second"

One concession from the EIB following its approval for Sepon was the unusual posting on its website of a Topical Project Brief. Appearing the day after Lord Hutton's inquiry report in the UK, it purports to provide "up to date details on the soundness of the project in economic, financial, technical, social and environmental terms." Yet this intended cure-all leaves many of the project's alarming aspects still very much up in the air.

Even at first glance, it's clear that much of the material has come via Oxiana and needs to be well verified. The claim that there is no danger of illegal logging is just one example – this can be challenged by the World Bank's report on forestry in Laos, showing clearly that the authorities have no capacity whatsoever to monitor the sector. NGOs are preparing a detailed response to the EIB brief and will continue to question the legitimacy of EU money being invested in such dubious projects. The EIB's procedures for approving projects require urgent review. □

## Key independent EIR recommendations to the World Bank

### Governance

- Strengthen governance first so that countries are able to withstand the risks of major extractive developments. Develop explicit governance criteria, transparently and in a participatory manner, which should be met before investments for the extractives industry.

### Pro-Poor Policies

- Help client countries assess the advantages and disadvantages of the oil, gas, and mining sectors compared with other development options and undertake a comprehensive options assessment before a project is supported.
- Provide an equitable share of the revenues to local communities.
- Ensure that poverty reduction plans are in place prior to project start
- Support projects with voluntary resettlement and resettled groups must be substantially better off
- Ensure that public health services associated with projects are available to all in the vicinity  
Require health impact assessments to be conducted during project preparation

### Human Rights and Indigenous Peoples

- Develop system-wide policy integrating human rights into the Safeguard Policies and establish a human rights unit
- IFC/MIGA should assess human rights records of sponsor companies prior to involvement  
Endorse and comply with all four core labor standards
- Ensure that borrowers and clients engage in consent processes with indigenous peoples and local communities directly affected by oil, gas, and mining projects, to obtain their free prior and informed consent
- All agreements with indigenous people and affected communities should be covenanted in project agreements/contracts
- No support for extractive industries in areas of conflict or at high risk of conflict
- Ensure that local grievance mechanism is in place for all extractive industry projects

### Environment

- Increase support of renewable energy lending by 20% annually
- Ban the use of riverine tailings and suspend all support for projects with submarine tailings pending outcome of independent studies
- Develop tailings criteria and should revise its cyanide guidelines to be more consistent with UN, EU guidelines and minimize support for mines using toxins, like cyanide, and promote safer substitutes
- Clarify ban on financing of extractive industry in protected areas as defined by UN, Natural Habitats Policy, or as designated by national or local governments
- Use safe, modern and well run vessels to carry oil or hazardous cargoes
- Establish clear guidelines on mine closures and condition financing on the set-aside of sufficient closure funds, which should be ring-fenced even after the World Bank Group's exit
- Emergency response plans should be in place at project outset and conform to best practices

### Disclosure and Transparency

- Disclosure of (revenue) payments on company and government level
- Vigorously pursue revenue transparency at country and company level
- Disclosure of : project contracts and agreements, like IPAs, HGAs, PSAs, PPAs; monitoring documents, economic, financial, environmental and social assessments.
- Produce and disclose a net benefit analysis for all projects
- Establish an information ombudsman to oversee application of the disclosure policy and decisions about confidentiality

### Institutional and Procedural Changes

- Phase-out support for oil by 2008, and formalize its moratorium on lending for coal projects immediately.
- Require comprehensive Environmental and Social Impact Assessments, including health impacts, for all policy lending affecting the extractive industry sectors in countries with significant EI or anticipated growth in EI sectors . □