

IDA19 DRAFT DEPUTIES' REPORT

Summary of Comments Received from the Public Posting and Actions Taken

November 25, 2019

Source	Comments	Response/Action
Overall		
Save the Children	<p>We are entering the decade of delivery on the Sustainable Development Goals and the World Bank's Twin Goals, but we will fail the world's poorest and future generations unless we significantly step up efforts. Progress achieved to date has been insufficient: on current trends more than 4 million children will die under age five in the year 2030, hunger is on the rise again, and little progress has been achieved on increasing the number of children who complete primary school. Targets will not be reached unless we see accelerated action for the children furthest behind.</p> <p>However, there also has been progress, and the World Bank's International Development Association (IDA) has helped pave the way on some major breakthroughs: Through its convening power, resource and focus the Bank has made major contributions to bringing in concessional funding into Somalia, and raised ambition and resource on health, education and nutrition at a time of low ambition with its human capital project. Ongoing efforts to put equity into the human capital project are showing successes on data disaggregation for the human capital index. And thanks to its convening power the Bank put education – an SDG hugely off track – back on the agenda for urgent deliverables by getting leaders to commit to tackle 'learning poverty' as a priority.</p> <p>IDA19 is being set up at a critical juncture and presents a massive opportunity to shift the dial. IDA is the largest concessional resource for the poorest countries. IDA18's record replenishment has helped resource and tackle some of the most persistent development challenges. Its hybrid financing model contributes to sustainability and value for money. Some of IDA19's envisaged strategic priorities - such as the strong and continuous focus on Fragility, Conflict and Violence, the emphasis on tackling climate change and invest in environmental sustainability, the ongoing commitment to foster human capital, and an increased focus on inequalities - already indicate a possible path for success.</p> <p>Equity is the make-or-break issue to achieve the commitments of the Agenda 2030, hence the Bank's increased commitment to tackling gender inequity and inequalities through</p>	<p>Noted with thanks. We very much agree with the need to emphasize urgency, as well as the critical importance of human capital – as reflected in the Bank's Human Capital Project. The IDA19 package reflects the calls from Participants –informed by voices of those reflected herein – to enhance focus on those the most marginalized – and hence, for instance, the introduction of disability as a cross-cutting issue. See more detailed responses below</p>

	<p>disability is very welcome. But IDA19 needs to go further than that: Decision makers need to put their pledge to reach the furthest behind first at the centre of policy design and resource allocation, across all themes and strategies. A focus on equitably fostering human capital for instance is key to building generational change. Today's generation of children will dictate the development pathways of nations, and the failure to build their human capital can hold back the progress of nations. It is through children that poverty, deprivation and the seeds of conflict are transmitted and thus endure; or vice versa that wellbeing and wealth is achieved. Climate change is another major risk factor that can derail any development progress achieved. It is therefore very welcome to see the Bank's increasing emphasis on and resources for tackling climate change and supporting adaptation and resilience. At a time when economic projections predict slowed down growth, and environmental crises and ongoing conflicts are threatening successes achieved so far, a focus on the furthest behind children and strengthening their rights and protection is all the more important. It is building development opportunities for the most deprived and marginalised children, in the most difficult places, that IDA19 needs to focus on, to pave the way for success.</p>	
BIC	<p>The IDA Draft Deputies Report reflects important progress on the draft policy commitments and indicators that were made public earlier this year. We are pleased that the level of ambition has increased for some of the indicators that we flagged earlier in this process. However, we believe that for several indicators and policy commitments, more is needed, and there remain important gaps that should be addressed before the draft is finalized. Below are a few areas in which we see a need for further strengthening of the draft to ensure that IDA19 truly espouses the overarching theme of "Ten Years to 2030," and the urgency with which that goal must be approached.</p>	<p>Noted with thanks for keeping track of the development of policy commitments through the year. As the document is being finalized, we will continue to be guided by, among other things, the ambition to help poor countries achieve their development outcomes. More specific comments below in the RMS session.</p>
Bretton Woods Project	<p>Firstly, in future it would be beneficial for IDA to hold this public consultation earlier in the replenishment process. It's my understanding from speaking to both IDA donor government representatives and World Bank staff that the policy proposals outlined in the 'draft' Deputies Report are more or less final, meaning that this consultation process will likely have little influence on the final outcome beyond perhaps small tweaks to specific policy commitments. Engagement with civil society stakeholders is an area where IDA should seek to improve in the future, by scheduling this earlier in the replenishment process, so that public consultation doesn't have the appearance of a box-ticking exercise (i.e. occurring when the proposed policy package is nearly fully baked).</p>	<p>Noted with thanks. From early in the replenishment process, several stakeholders including CSOs contributed to the development of the policy proposals that form the Deputies Report. Presenting it to the public before its finalized enables all stakeholders to be fully aware how the many different views have been synthesized, and where further action could be required.</p>
SECTION II (Overarching theme and cross-cutting issues)		
Human Capital		
Save the Children	<p>Building human capital in the most difficult places: step up efforts on refugee education Building human capital is critical for development: it is the foundation for generational change: The values, skills and capabilities that we engender in today's generation of</p>	<p>Noted with thanks. IDA19 focuses on the countries with the lowest Human Capital Index (HCI). This is reflected in some of</p>

	<p>children will dictate the development pathways of nations. Failure to put in place the human capital foundations will have consequences for generations. IDA19 needs to increase focus on the most deprived and marginalised children within its human capital project; and prioritise building human capital in the most difficult places. The Bank’s initiative to tackle learning poverty is already very welcome. By leading the way on agreeing and financing education for the world’s refugee children, the World Bank can now make a major contribution to avoid losing the generation of more than 3.7 million refugee children that are currently not in school.</p>	<p>the IDA policy commitments. In addition, through our country dialogue in education, health and social protection we will continue to work with countries to support them in stepping up human capital investments while taking a “whole of government approach” aligning investments from different sectors and focusing on the most vulnerable as reflected in IDA’s country partnership frameworks.</p>
<p>Results Canada</p>	<p>IDA should maintain a continued commitment to the Human Capital Project It is good to see within the Deputies Report an acknowledgement of the widely accepted principle that prioritizing investments in human capital through health, nutrition and education interventions contributes to sustainable growth and poverty reduction. Over the past few years IDA and the World Bank Group’s investments in the Human Capital Project have been critical in the fight against extreme poverty and creating sustainable growth around the world. However, in IDA 19 there needs to be a recommitment to the Human Capital Project. In order to show a continued commitment to the Human Capital Project, IDA should outline how it plans on connecting the Human Capital Project to the thematic areas of the IDA 19 replenishment, and specifically how it plans to address issues regarding health, nutrition, education and early childhood development. Additionally the Bank should confirm this commitment by building on the African Human Capital Plan in particular, which committed to increasing World Bank financing for human capital projects in Africa by 50% from 2021-2023, as well as to increasing financing operations for human capital projects by 50% in IDA 19 overall. The success of the African Human Capital Plan is particularly important as we know that global poverty will be increasingly concentrated in the region.</p> <p>There needs to be more publicly available data on the indicators of the Human Capital Index The Human Capital Index is the best available option we have for measuring the impacts of the Human Capital Project, and it serves as a useful indicator of recipient country performance levels on the key areas of health, nutrition, education and early childhood development. This is why it was good to see improvements being made to the index, in particular the inclusion of new indicators such as stunting. However, there remains an issue of transparency, as the baseline data being established in the index is not publicly available. This data will be an important asset to country governments, civil society actors, researchers and others needing to build out a better understanding of the effectiveness of IDA programming. In the final Deputies Report it would be great to see a commitment that makes this essential data publicly available.</p>	<p>Noted with thanks. The Human Capital Project is connected to the IDA19 special themes with specific policy commitments to:</p> <ul style="list-style-type: none"> • improve public expenditures and sustainable aligning of domestic and external resources, and strengthen public finance management for human capital financing under the Governance and Institutions Special Theme; • improve skills and employability in Jobs and Economic Transformation theme; support increased access to quality reproductive and adolescent health care under the Gender and Development Special Theme; and • improve service delivery in selected Fragile and Conflict-affected States, while addressing the constraints faced by men and women, boys and girls, including those with disabilities. <p>Data on the Human Capital Index and its components for 157 countries, along with data sources, are available on the Human Capital Project website and the World Bank’s DataBank website.</p> <p>https://www.worldbank.org/en/publication/human-capital</p> <p>https://databank.worldbank.org/home</p>
<p>Oxfam</p>	<p>EDUCATION: Prohibit funding to for-profit schools through the Private Sector Window and support countries to increase education and health financing</p>	<p>Noted with thanks. As discussed in the World Development Report 2018 on Learning, education is a basic public good, and it is central to unlocking human capabilities. The World Bank</p>

	<p>a. <i>Committing to public, free, quality education for all</i></p> <p>The role of the World Bank in supporting IDA countries to improve their public education provision cannot be over emphasized. However, the Bank has also actively advised and funded governments to expand the role of the private sector in education provision, including public-private partnerships, and the International Finance Corporation (IFC) continues to invest in for-profit school chains. This is cause for alarm given the impact of market-oriented provision of education services, particularly through low fee and for-profit private schools, including reinforcement of inequalities by disproportionately excluding and marginalizing students from the lowest income households and girls. Oxfam recommends the addition of language in the narrative stating:</p> <ul style="list-style-type: none"> • <i>The World Bank commits to support countries to provide free and universal quality public education under IDA19. All primary and secondary education projects will support public provision of education.</i> • <i>All TA/ASA for education shall be oriented towards strengthening public education provision, including to address gender disparities and other forms of exclusion.</i> • <i>Due to serious concerns in commercial education, notably inequality and gender exclusion, the International Financial Corporation (IFC) will refrain from investing IDA funds in for-profit primary and secondary education providers through the Private Sector Window.</i> 	<p>Group is committed to removing barriers to access to quality education. As such, IDA is committed to promoting basic education. In October 2019, we launched a Learning Poverty Indicator with the goal of eliminating learning poverty. This requires working with countries to help them develop the right social contract to ensure mobilization of adequate resources in order to ensure at least minimal levels of education are received by all, specifically that every child will be able to read by the age of 10 years. This will call for a strong public sector. The reality on the ground is that IDA is mostly supporting strengthening of public education, but there are cases where there is a large private sector already providing education and some countries have chosen to give a large role for non-state providers including public-private partnerships. In those cases, we urge countries to develop regulation and oversight to ensure equitable access and minimum quality of service across public and private sectors.</p> <p>It may be helpful to recall that in nearly all cases, IDA financing for education is channeled through respective governments. Furthermore, Technical Assistance and advisory and analytic services are developed in accordance with the priorities of the IDA countries given IDA's country-led model.</p>
<p>RESULTS Korea</p>	<p>In April of this year, the World Bank launched what is probably the most ambitious action plan ever adopted by the international community, the Africa Human Capital Plan.[1] In it, the Bank notes that if Africa could increase its human capital, its GDP would be multiplied by 2.5! In this Plan, the Bank has put forward ground-breaking targets for Africa to be reached in four years in the areas of under-five mortality reduction, access to sanitation and stunting (low height per age) reduction.</p> <p>Needless to say, the Bank calculates that IDA resources dedicated to human capital will have to be increased by 50% for African countries. In fact, the targets of IDA 19 do not track the objectives of the Africa Human Capital Plan, and some of the targets of IDA 19 are way below the Africa Human Capital Plan: for instance, IDA 19 talks about providing 15-20 million people with improves access to sanitation whereas the African Human Capital Plan targets 7.9 % of the population, i.e. 60 million people. It is as though the right arm ignores what the left arm is doing at the World Bank</p> <p>The Africa Human Capital Plan needs to become one of the central transformative priorities of IDA. We need to insist that fulfilling on the Africa Human Capital Plan and</p>	<p>Noted with thanks. The Africa Human Capital Plan will be monitored on a regular basis (including annually) and reporting will be done alongside the reporting for IDA19. The IDA Results Measurement System (RMS) is an aggregated and representative monitoring system across all IDA countries. Indicators in the RMS are selected with a view to providing progress across all IDA countries. It is complemented by results from specific programs such as the Africa Human Capital Plan.</p>

	<p>its specific targets figure prominently in IDA 19. In addition, we need to ensure: - That a report is issued every year on how much IDA19 funding is dedicated to funding of human capital initiatives in Africa - That the Results Management System of IDA19 is aligned with the goals of the Africa Human Capital Plan (for instance, the current proposal is to measure number of children and mothers receiving health and nutrition treatment, but if we want to reduce child mortality and child stunting, we need to count separately the number of children; similarly, the current proposal calls for measuring the number of beneficiaries of social protection programs, while the African Human Capital Plan calls for measuring the number of beneficiaries from the lowest quintile, an important detail when most beneficiaries tend to be from quintiles other than the poorest one) - The goals of the Results Management System of IDA need to be aligned with the goals of the Africa Human Capital Plan.</p> <p>[1] http://pubdocs.worldbank.org/en/562231555089594602/HCP-Africa-Plan.pdf</p>	
<p>Jean-Francois Tardif (National Coordinator of Global Poverty Solutions, Canada)</p>	<p>As part of the Africa Human Capital Plan (AHCP), the World Bank has committed to increasing education and health investments on that continent by 50%, reducing under-five mortality by 40%, reducing open defecation by one third, and increasing social protection coverage for the poorest quintile by 50%. All of the foregoing is to be achieved within 4 years, which will make it the fastest advance in human development in history! It is therefore extremely hard to understand how the Africa Human Capital Plan is not even mentioned once in the IDA Deputies' Report. Just as importantly, the quantitative goals of the Plan are absent from the proposed IDA Results Management System. Should this silence be construed as the Deputies' intention to focus efforts elsewhere? Let's hope not, otherwise our organization would not be able to support a Canadian contribution to IDA, when Canadian aid is very limited and must be concentrated on human capital priorities.</p> <ul style="list-style-type: none"> • Recommendation 1: Mention the Africa Human Capital Plan by name, with its quantitative, time-bound goals, as a key commitment for IDA19. This is quite compatible with the rest of the current general orientations of IDA19. The mention should also come with an acknowledgement that the AHCP will require, for participating countries, nearly half of their IDA allocation. • Recommendation 2: The World Bank has, unfortunately, a tendency to make important commitments in the area of human development and not follow up publicly on them. For instance, the \$600 million promised at the Nutrition for Growth Summit in 2013, and \$1.7 B at the Milan Global Nutrition Summit of 2017, and \$2 billion at the 2017 G7 have not been tracked. Consequently, IDA should report on an annual basis on the funding allocated to the AHCP. • Recommendation 3: Adjusting the Results Management System (RMS) so it reflects the priorities of the AHCP. a)Under-Five Mortality and Stunting: These indicators are currently under Tier 1 (i.e. contextual indicators, not addressed by Bank 	<p>Noted with thanks. The Human Capital Project features prominently in the IDA Deputies Report. The emphasis in Africa is reflected by the fact that out of the 30 countries with the lowest Human Capital Index, 25 are in Africa. Many of the Human Capital Commitments are intended to emphasize support to the countries with the lowest Human Capital Index (HCI). However, since IDA countries are distributed among various regions in the world, the commitments and results encompass all regions, including Africa.</p> <p>The IDA Results Measurement System (RMS) is an aggregated and representative monitoring system across all IDA countries. Indicators in the RMS are selected with a view to providing progress across all IDA countries. It is complemented by results from specific programs such as the Africa Human Capital Plan.</p> <p>IDA does track financing to nutrition and other goals. However, while IDA makes efforts to support countries that need to increase financing to nutrition, this is done in the context of a country-led demand-driven model. IDA has continued to work consistently with countries focusing on those that need to pay greater attention to nutrition and ensuring that support from IDA complements support from other partners. IDA will track financing to the AHCP, while recognizing that this will be done in the context of the demand-driven country-based model.</p>

	programming); they should be moved to Tier 2 as they are direct operational indicators of success in the Africa Human Capital Plan; b) The Africa Human Capital Plan targets beneficiaries in the bottom quintile, not all beneficiaries like the RMS (beneficiaries tend not to be the poorest); and c) Women and Children who have received basic nutrition service should be tracked separately to assess potential impact on child stunting, a goal of AHCP .	As noted above the IDA RMS covers all IDA countries and is therefore not tailored to report on progress in one region such as Africa, specifically. However, monitoring of the AHCP will complement monitoring of the IDA RMS.
Disability		
BIC	For disability to truly be a cross-cutting issue, there must be specific policy commitments within each of the five special themes that address the specific impact of each theme on persons with disabilities. Unfortunately, disability is still missing from the Gender and Development as well as the Climate Change special themes. Unless persons with disabilities are explicitly referenced in the policy commitments or the policy commitments take a more comprehensive, inclusive approach to address the needs of persons with disabilities, they will continue to be overlooked and will not be able to benefit from and could be potentially harmed by Bank projects. This could be addressed in the draft agreement, by adding disability to existing commitments. For example, the Gender special theme includes a commitment to support at least 5 IDA countries to invest in gender-based violence (GBV) prevention and response, including “delivering safe, quality, inclusive health care and other services through health systems.” Adding “mental health” here would be an important way to make sure such systems were truly inclusive and address the needs of persons with disabilities and would serve to highlight what “other services through health systems” could actually mean.	<p>Noted with thanks. We recognize the importance of this agenda, which is why IDA19 does more than ever to expand equitable opportunities for people with disabilities, as they are often disproportionately affected by poverty, natural disasters, conflict and violence. Policy commitments are important ways to demonstrate how IDA is pushing the envelope in priority areas where IDA has the mandate and capacity for impact. In no way do the IDA Policy Commitments reflect the scope of what IDA does in development.</p> <p>We also agree on the importance of providing mental health services to survivors of gender-based violence, but singling it out in the commitment language risks diminishing its scope. This commitment to launch more systemic initiatives (for instance through national health systems) to prevent and respond to gender-based violence will help provide access to several co-located and essential services for survivors of gender-based violence, such as psychosocial support, health care, socioeconomic opportunities, sheltering options, and legal support</p>
Debt		
TCX	Although the report stresses the importance of debt sustainability and resilience, it largely ignores currency risk and its contributions to explosive debt growth in case of sharp depreciations. We propose that the report should reflect the discussions on currency risk which have had occurred on various levels within and outside of IDA as they are of relevance for IDA 19 and future rounds. A significant number of IDA Deputies support exploring a pilot program of IDA loans denominated in local currencies, because increasing the share of external financing denominated in domestic currency will strengthen resilience AND also is an important step towards more debt and risk transparency.	Noted with thanks. We agree that currency risks are one of the risks facing IDA countries. However, it needs to be seen in the broader context of the macroeconomic risks.. As noted in the Deputies’ Report, IDA Participants support a 2-stage approach to develop solutions that would benefit IDA countries in accessing local currency financing. Recognizing the complexity and challenges in developing new local currency solution products, IDA plans an in-depth analysis of the topic by June, 2020, with the aim of developing and discussing a proposal at IDA19 MTR.
TCX	Capacity building efforts in debt management are very important. We propose to add specificity by highlighting the need to build currency risk stress-testing and management	Noted with thanks. We recognize the critical importance of capacity strengthening efforts in debt management for IDA

	capacities in national debt management offices/treasuries as well as training its officials about the use of standard hedging instruments and their legal and contractual framework	countries. This is why capacity building is a critical component of the World Bank-IMF Multipronged Approach for addressing emerging debt vulnerabilities.
SECTION III (Special Themes and Policy Commitments)		
JET		
Sight-Savers (UK)	<p>We welcome JET policy commitments 7 and 8, and the inclusion of disability disaggregated data in commitment 12. We recommend the JET theme should:</p> <ul style="list-style-type: none"> • Ensure disability inclusion is embedded into analytical tools including the SCDs and CPSDs which the report recognizes will underpin the theme; • Ensure inclusion, gender and disability are considered in initiatives in Pillar 1 as well as Pillar 2; <p>Adapt commitment 1 by adding ‘inclusive’ to economic transformation’ and a footnote that explains this includes people with disabilities, women and other marginalized groups</p>	<p>Noted with thanks. WBG is strengthening our analytical base to address disability inclusion and is increasingly integrating disability inclusion into its core diagnostics.</p> <p>IDA is mainstreaming inclusion, including gender, youth, and disability, as part of the JET theme. And while this is considered broadly across both pillars of JET, from the practical perspective of monitoring analytics and operations, and because Pillar 1 interventions tend to take place at the macro and sectoral level, policy commitments on inclusion show up mainly in Pillar 2. This PC is about sector-level interventions to support private sector-led transformation. While IDA will support inclusion broadly (including disability), bringing disability inclusion into the policy commitment is not practical and likely a category error</p>
Gender and Development		
Sight-Savers (UK)	<p>We are concerned that women and girls with disabilities are not included in Gender and development commitments. The Report recognizes that women and girls with disabilities experience disproportionate barriers (Para.57), and that the theme should strengthen the resilience of women and girls with disabilities who are often the most marginalized. As drafted, policy commitments do not reflect the importance of this issue. Without explicit reference to women and girls with disabilities within policy commitments there is significant risk they will be excluded in IDA19 implementation.</p>	<p>Thank you for your comment. IDA will make every effort to include people with disabilities in IDA operations. Explicit reference to disability were made in policy commitments that do not exclude men and boys living with disabilities, such as in the Governance and JET Special themes.</p>
BIC	<p>PC6. Support at least five IDA countries to invest in GBV prevention and response, delivering safe, quality, inclusive health and mental health care and other services through health systems, and five countries to implement GBV prevention and response protocols as part of safe and inclusive schools.</p>	<p>Thank you. We agree on the importance of providing mental health services to survivors of gender-based violence, but singling it out in the commitment language risks diminishing its scope. This commitment to launch more systemic initiatives (for instance through national health systems) to prevent and respond to gender-based violence will help provide access to several co-located and essential services for survivors of gender-based violence, such as psychosocial support, clinical health care, socioeconomic opportunities, sheltering options, and legal support</p>

FCV		
Sight Savers (UK)	We are pleased the FCV theme recognizes people with disabilities face increased risk in fragile and conflict settings. We welcome recommendations to scale up human development investment and the need to focus on addressing differential constraints and the inclusion of disability in policy commitment 3.	Noted with thanks.
Save the Children	Prioritise children’s rights and protection in action on Fragility, Conflict and Violence. It is encouraging to see a strong and continuous focus on Fragility, Conflict and Violence in IDA19; the emphasis on tackling gender-based violence is particularly very welcome. The Bank should build on this by placing greater emphasis on children, and ensuring their rights and their protection in the most difficult places. For the overall FCV theme this means increasing focus on protecting children in fragile and conflict affected states; for activities on gender-based violence it requires increasing the focus on girls. More than 420 million children are currently living in conflict zones, and the number of grave violations of rights - including killing, sexual violence and recruitment as soldiers – committed against children has increased by 174%. Often they will carry the effects of trauma into adulthood, limiting their ability to bring generational change. Girls are at particular risk – child marriage for instance is one major factor of early school leaving, increases the risk of violence, and limits a society’s ability to grow the economy. The Bank should therefore strengthen the focus on children in its action on FCV and GBV, and work with others, using its global leadership and convening power to secure action.	Noted with thanks. We agree on the importance of highlighting the needs of children, especially in FCV settings. We use the term ‘men, women, boys and girls’ consciously throughout the document to acknowledge the special circumstances and needs of children. FCV policy commitment 3 highlights the need to consider the different constraints faced by boys and girls in improvements to social service delivery. Children are also highlighted when the report discusses forced displacement, the human capital index and child marriage in the context of the Sahel Women’s Economic and Demographic Dividend (SWEDD) project. (See box 6, paragraph 86, footnote 95, and paragraph 117.) There are also several RMS indicators covering children and these are disaggregated by FCS.
International Rescue Committee (IRC)	The World Bank’s financing for refugee responses has been some of the most consequential financing to hit the aid system in recent history, and the International Rescue Committee (IRC) fully supports the renewal of the IDA Window for Host Communities and Refugees (WHR). We are encouraged to see that the IDA Deputies Report reflects lessons learned, especially from the IDA18 Refugee Sub-Window (RSW), and calls for a number of critical adjustments to ensure the WHR meets the longer term needs of refugees and hosts. However, there remain a few areas where the World Bank could go even further to ensure WHR financing and programs have a positive impact on beneficiaries. The IRC welcomes the newly introduced systematic review of refugee policy and institutional environments in countries eligible for the WHR to identify and track progress against policy reform opportunities. This is a clear value-add, as demonstrated by refugee-specific financing that has supported policy reforms in Ethiopia, Jordan and elsewhere. Partnering with UNHCR on the methodology of the assessment is a good first step, and we encourage the World Bank to incorporate the views of beneficiaries and NGOs who work closely with refugee and host community populations as well. We urge the World Bank to ensure the review and recommendations are made public, as transparency will encourage accountability for policy reform commitments. In addition, we are encouraged by the acknowledgement that the Bank will need to partner with other multilateral development banks, UN agencies and NGOs.	Noted with thanks. We will be happy to consult on the methodology of the refugee policy and institutional assessment with relevant stakeholders, including civil society organizations. We take note of your interest and will be sure to be in touch. Beyond the methodology, when it comes to the actual review, we expect that the findings of the review will be made public. The review will also be discussed as part of the IDA19 Mid Term Review.

International Rescue Committee (IRC)	<p>The World Bank’s collaboration on Risk and Resilience Assessments, steering group in Cameroon, and coordination with UNHCR are all promising exercises. We agree with the IDA Deputies that the World Bank needs to provide more support to establish and strengthen multistakeholder platforms that include women and vulnerable groups—particularly refugees—in policy making and project implementation. Through IDA19, the World Bank should incorporate multistakeholder engagement in project cycle design and introduce a formal structure at the country level to support consultation, coordination and joint planning and analysis with development and humanitarian partners.</p> <p>The IDA19 framework should also expand its exceptional basis for direct financing to non-governmental actors to be an option in refugee contexts, where bank programs could benefit from the unique access, geography, knowledge and impartiality of NGO partners.</p>	<p>Noted with thanks. Please note that the term ‘vulnerable groups’ is sufficiently broad to cover refugees and host communities, where relevant. These multi-stakeholder platforms are country driven and IDA cannot guarantee the composition of each platform, but IDA will support countries to improve these platforms in order to enhance participation, accountability, and responsiveness.</p> <p>Noted with thanks. Please also note that the comparative advantage of the Refugee Sub-Window (RSW) which will soon be renamed as the Window for Host Communities and Refugees (WHR) is its engagement with governments. Also, the RSW/WHR does not operate in countries where the government does not have in place an adequate protection framework, which is a key criterion for the RSW/WHR.</p>
International Rescue Committee (IRC)	<p>The World Bank should commit to helping host governments include refugees in their national and subnational development plans and reporting on SDG indicators (i.e. Voluntary National Reviews). The Joint Data Center with UNHCR should support these efforts. In addition to the WHR eligibility criteria already identified, the IRC proposes the following additional terms for WHR-funded projects:</p> <ol style="list-style-type: none"> 1. A commitment by the government to include refugees in national development plans and in Voluntary National Reviews of progress towards the SDGs; 2. Description of the proposed project objectives, including outcome-level objectives for both refugees and host communities, and indicators that are disaggregated by age, sex, and status; and 3. A strategy for consultation, coordination and joint planning and analysis with other development and humanitarian partners (UN agencies, CSOs), and with beneficiaries 	<p>Noted with thanks. Eligibility to the RSW requires the adoption by the Government of a strategy or policy document outlining their approach to managing the refugee situation in a manner that is consistent with the objectives of the WHR. This may include the inclusion of refugees into government strategies (including National Development Plans), and we would also continue supporting the government with policy and institutional reforms and prioritization. We are committed to support through the JDC those countries that are including refugees in Voluntary National Reviews of progress toward the SDGs.</p> <p>Results frameworks for RSW projects already have indicators disaggregated by sex and status. For any further disaggregation, we will follow a good targeting practice developed for other Bank projects.</p>
International Rescue Committee (IRC)	<p>We are pleased that the World Bank will invest in reducing gaps in core data to support evidenced-based policy making. One of the World Bank’s comparative advantages is its expertise in data collection and analysis; however, refugees are typically left out of the types of data collection that the World Bank supports, such as household surveys. IRC analysis of national SDG progress reports, which largely draw on household survey data, found that refugees are typically excluded; yet, refugees are critical to achieving the SDGs and the Bank’s goals to reduce poverty and increase prosperity.</p>	<p>Noted with thanks. As part of the implementation of WHR, there may be scope in future for the WHR to finance statistical capacity building and related projects, where there is client demand and where the project meets other WHR criteria.</p>
Climate Change		

Sight-Savers (UK)	<p>We recommend replicating the narrative on disability and FCV (Para.107 & 112) in the Climate Change theme (Para.96) which currently fails to connect the importance of an inclusive approach to building resilience.</p>	<p>Noted with thanks. IDA19 is committed to supporting climate change related investments in policies and programs that promote inclusive low-carbon development and adaptation and resilience building. This entails ensuring focus on the most vulnerable people, including people with disabilities.</p>
Tearfund, CAFOD, Bretton Woods Project	<p>We were pleased to note that the revised climate change policy commitments, under the pillar ‘Facilitate Economic Transformation through Low-Carbon and Resilient Transition’, now include a number of more explicit references to energy access, relative to earlier drafts.</p> <p>The IDA19 climate change policy commitments in their current form constitute a missed opportunity to focus more explicitly on acute energy access deficits in IDA member countries and to move to more impact-focused investments. Including more robust RMS indicators to track energy access gains in ‘high-impact countries’ (HICs), and via off-grid sources, is crucial to target investments and increase transparency around the Bank’s work to improve people’s access to energy and reduce poverty.</p>	<p>Thank you. IDA19 policy commitments are focused on investments to promote the generation, integration and enabling infrastructure for renewable energy in IDA countries, which will lead to increased energy access and thus contribute to SDG7.</p> <p>The World Bank has a long track record of supporting energy service delivery through our investments across the grid value chain and in off-grid; with a focus on tailoring our approach to suit every client country’s unique circumstances. Over the last five years (FY2015-19), the World Bank directly contributed to providing new electricity connections for more than 52 million people. The World Bank is working with client Governments in creating a momentum for private sector participation in mini-grids and off-grid, largely fueled by renewable energy, by helping to put in place enabling policies, demonstrating viable business models, and providing various financial incentives to build a market in peri-urban and rural areas. The World Bank has led the development of a methodology for (i) multi-tier framework for energy access beyond binary measures and are implementing comprehensive surveys to assess the quality of energy service with respect to reliability, legality, and affordability (ii) regulatory indicators for energy access to measure enabling environment for grid, mini-grids, and off-grid supply solutions.</p>
Bretton Woods Project	<p>Page 46 of the Draft Deputies Report notes, ‘IDA will actively engage at a policy level and foster development policy financing (DPF) operations to support climate-informed policies and reforms at the sectoral level, where appropriate. Prior actions which address climate policy issues will be embedded more into DPFs, and in cases where the country wishes to focus policy reforms solely on climate change, green growth or climate change DPFs can be developed, where all prior actions will address climate change. DPFs could, for example, include support for fossil fuel subsidy reforms, agriculture subsidy reforms, environmental tax reforms, water pricing, and priority policies in climate-related action plans, including NDCs.’ However, in some cases World Bank DPFs support ‘business as usual’ extractivist forms of development (as DPFs in recent years in Guyana, Egypt, Mozambique, Indonesia & Peru demonstrate). Such support for fossil fuel development is inconsistent with efforts to keep global warming below 1.5°C, and flies in the face of the</p>	<p>Noted with thanks. IDA19 is committed to helping countries accelerate the transition to clean energy and a low-carbon economy by ensuring that they have access to the latest policy, financial and technological innovations and helping them implement the approaches that best suit their needs. DPF is an important instrument for helping countries strengthen their policy and institutional frameworks to achieve their climate and development goals. It provides general, non-earmarked budget support and disburses against policy and institutional reforms designed to achieve development objectives agreed with the country..</p>

	<p>urgent need to shift to pro-poor, low-carbon development, as mandated by the Paris Climate Agreement. To address this issue, IDA19 should introduce an exclusion preventing DPFs from supporting the expansion of fossil fuels production in IDA countries, by adding coal, oil, and natural gas to the Excluded Expenditures of World Bank Development Policy Finance in IDA member countries. The following language should be added to all Development Policy Finance legal agreements: The Recipient undertakes that the proceeds of the Financing shall not be used to finance Excluded Expenditures (“Excluded Expenditure” means any expenditure: for goods or services intended for coal, oil, or natural gas power plants, exploration, extraction, and/or transport).</p> <p>Page 47 of the Draft Deputies Report notes IDA19 will, ‘Develop new resilience metrics designed to give increased incentives for more effective climate adaptation actions, including through enhanced disaster resilience of infrastructure developments, and pilot them in 20 IDA operations.’ IDA should add additional language on the need to consult project-affected communities, including women and girls, as part of assessing the ‘resilience’ of IDA projects to be added to this policy commitment, and the World Bank should open up the pilot version of its resilience rating metrics to public consultation, so that CSOs and academic experts can provide feedback on the ranking’s development. This is necessary in order to ensure that the Bank’s resilience metrics are well aligned with enhancing the resilience of people on the ground, in addition to meeting the needs of governments and private-sector investors. This is a potential gap in the metrics the Bank is devising, as it does not have a track record of assessing the systemic resilience of its projects on wider locations and systems. If this policy commitment is to deliver the desired benefits to IDA countries, a robust consultative process will be required.</p>	<p>Further, the WBG has not financed new coal-fired power plants since 2010. We acknowledge that the transition to a new low-carbon economy can impact local communities and we support countries to ensure a just transition. As announced in December 2017, the WBG will no longer finance upstream oil and gas after 2019, with special consideration only in exceptional circumstances. We have adapted our work in energy to keep pace with our client countries’ evolving needs and unique circumstances, with the primary goal of helping countries achieve universal access to affordable, reliable, modern, and sustainable energy.</p> <p>Regarding page 47: Feedback from CSOs and academic experts is very important to us. For instance, as part of our ESF policy, we do consult with project affected communities with stakeholder engagement throughout a project lifecycle. Additionally, the resilience rating metric considers both the resilience of the project and the impact on the resilience of beneficiaries (broadly defined to include communities, regions, countries) which will ensure that the needs of project-affected communities are accounted.</p> <p>While the methodology will be piloted through FY20, it is expected to evolve based on experiences gained from its application, as well as offering opportunities to collect sector-specific feedback.</p>
BIC	<p>PC4. Support at least 25 IDA countries to reduce the risks of climate shocks on poverty and human capital outcomes, particularly for the most marginalized including persons with disabilities, by supporting programs that incorporate Adaptive Social Protection (ASP) into national systems or reduce climate threats to health.</p>	<p>Noted with thanks. IDA19 is committed to supporting climate change-related investments in policies and programs that promote inclusive low-carbon development and adaptation and resilience building. The referred policy commitment targets support to the most vulnerable people, which includes persons with disabilities.</p>
BIC	<p>We welcome the addition of a policy commitment to support IDA countries to implement their National Biodiversity Strategies and Action Plans. That said, we think more ambition and specificity is needed around this important theme. For example, the Tier 1 indicator, "Marine protected areas (% of protected areas)" is too vague, and possibly counterproductive, since marine protected areas could be increased by decreasing terrestrial protected areas. To make this more specific, one of the following changes should be made (in bold):</p>	<p>Thank you. The indicator has been corrected as “Marine protected areas (% of territorial waters)”, which is in accordance with the World Development Indicators.</p>

1. Marine protected/**Marine managed areas** (% of **exclusive economic zone with sustainable management**). This would ensure it is related to the marine area the nation controls.
2. Marine protected/**terrestrial protected areas** (% of **terrestrial and marine territory under effective protection**).

In addition, the numbers in some of the climate change commitments could still be more ambitious. For example, the target for support for both NBSAPs and NDCs—15 countries each—seems based on what is already in the pipeline, rather than stretching at all. We would recommend this number be increased to at least 20. Similarly, we welcome the increase of the percentage of IDA’s climate co-benefits share of total commitments was increased from 28% to 30%, but since the target of 28% has already been achieved, we think this number should be higher to reflect the urgency of the climate crisis, and the target set to at least 45%.

IDA19’s commitment to support implementation and/or updating of NBSAPs covering terrestrial and marine biodiversity, or similar national action plans, is ambitious. We would also like to point out that the Bank’s efforts on biodiversity go well beyond traditional conservation to include ecosystem services and nature-based solutions and more explicit support for the design and implementation of NBSAPs. Through our work, IDA19 will support efforts to increase resilience of IDA investments, ecosystems and communities to climate-related shocks and stressors, including in coastal areas.

The revised target of *at least 30 percent* of climate co-benefits over FY21-23, as is proposed for IDA19, would represent a significant increase, from the FY17-19 levels of 27%. IDA19 is committed to doing more in FCV countries and will continue to increase its focus on building Human Capital and Maximizing Finance for Development (MFD). IDA climate co-benefits in FCV countries are much lower than the overall IDA co-benefits level. This is mostly because a large share of lending in FCV countries is dominated by Human Development, and Equitable Growth, Finance and Institutions Practice Groups. Although co-benefits for these sectors have been increasing, these sectors on average achieve lower co-benefits than Sustainable Development and Infrastructure sectors.

The proposed target to support national climate-related action plans, including NDCs, has been revised from supporting 10 to 15 IDA countries. It is ambitious because it commits to systematically supporting *at least 15 IDA* countries over three years, which presents a 50% increase compared to IDA18, where the NDC-related commitment targeted 10 IDA countries. The support is systematic, and will consist of providing in-depth, sustained efforts in capacity building, identifying and addressing key policy bottlenecks and economic constraints to implement national climate action plans, such as NDCs. It will translate these plans and NDCs into policies, supporting NDC updates to make

		them more ‘investment ready’, and integrating identified NDC actions into budget and planning processes.
Governance		
Sight-Savers (UK)	We welcome the inclusion of disability in Governance and Institutions policy commitment 12. Supporting institutions to build capacity on disaggregating by disability will be crucial to embed disability. We also recommend adapting commitment 4 to recognize the need to strengthen infrastructure governance to support inclusive infrastructure and the embedding of the principles of universal design, and adapting commitment 10 to include people with disabilities, in addition to women - without an explicit reference, and instead mentioning vulnerable groups, there is a risk that people with disabilities will be excluded and any specific needs not considered.	Noted with thanks. We agree on the importance of addressing the challenges facing people with disabilities, which is why IDA19 will do more than ever to expand equitable opportunities for people with disabilities, including under the 6 relevant policy commitments (two under the Governance and Institutions Special Theme.) Please note that the term “vulnerable groups” in PC10 is sufficiently broad to cover people with disabilities, where relevant. These multi-stakeholder platforms are country driven and IDA cannot guarantee the composition of each platform, but will support countries to improve these platforms in order to enhance participation, accountability, and responsiveness. ,
Pathfinders for Peaceful, Just and Inclusive Societies – Task Force for Justice	<p>The draft IDA19 Deputies’ Report, indicates that IDA19 aims to accelerate progress toward the World Bank Group Twin Goals and the Sustainable Development Goals (SDGs). These comments focus specifically on SDG16 and the political leadership of a diverse set of countries that are working together to implement this goal.</p> <p>The Pathfinders for Peaceful, Just and Inclusive Societies is a group of countries, international organizations, global partnerships, civil society, and the private sector, that work to accelerate the delivery of the SDG targets for peace, justice and inclusion (SDG16+). Pathfinders is hosted by the NYU Center on International Cooperation.</p> <p>In July 2019, the Pathfinders adopted a joint statement on SDG16+ and presented the Justice for All report. Both documents can provide critical information on the international consensus that is emerging on how to accelerate progress on SDG16 and the agenda for action that the Pathfinders’ Task Force on Justice has set that will help deliver the SDG targets that promise justice for all.</p> <p>Joint statement on SDG16+ Thirty-seven governments agreed on a joint statement on SDG16+, that was presented in July 2019 at the High-Level Political Forum on Sustainable Development. Its key message was the need for accelerated action to:</p> <ul style="list-style-type: none"> - Significantly reduce all forms of violence everywhere, with the aim of halving global violence. - Shift from a world where justice is only available to the privileged few, to one that protects human rights and provides justice for all. 	Noted with thanks. We agree on the importance of SDG16, including in relation to strengthening justice and the rule of law, especially in FCV settings but also more broadly . We have several references to justice and the rule of law in the draft report, including in the supporting discussion of Governance and Institutions policy commitment #11 and FCV policy commitment #1. We have also added a footnote at paragraph 121 to cite the Justice for All Report.

- Transform institutions so that they can meet the aspirations of people and underpin the ambitions of the 2030 Agenda.
- Tackle inequality and exclusion so that all people have a stake in a fairer and more sustainable future.

This call to action brings together Afghanistan, Argentina, Australia, Belgium, Brazil, Canada, Central African Republic, Colombia, Czech Republic, Democratic Republic of Congo, Estonia, France, Georgia, Germany, Ghana, Guatemala, Indonesia, Ireland, Jordan, Liberia, Liechtenstein, Mexico, Mongolia, The Netherlands, Norway, Qatar, Republic of Korea, Rwanda, Sierra Leone, Somalia, Sri Lanka, Sweden, Switzerland, Timor-Leste, Tunisia, United Kingdom, and Uruguay.

The call to action was prepared under the leadership of the Permanent Mission of Argentina and was discussed by Permanent Representatives to the UN at meetings hosted by Argentina, Switzerland, Norway, and the Republic of Korea.

The full text is available here:

https://static.wixstatic.com/ugd/6c192f_9736e99ac2a14b168039311b7e0ff4d3.pdf

Justice for All report

The Justice for All report states that to deliver justice for all by 2030 in a world where billions of people are not yet able to obtain justice, we must resolve justice problems, prevent injustices from occurring, and use justice systems to create opportunities for people to participate fully in their societies and economies.

In order to realize the ambitions of the SDGs, we must:

- Place justice at the heart of sustainable development
- Put people at the center of justice systems
- Move from justice for the few to justice for all

The report was presented by the Task Force on Justice, which was co-chaired by H.E. Germán Garavano, Minister of Justice and Human Rights of Argentina; H.E. Sigrid Kaag, Minister for Foreign Trade and Development Cooperation of the Netherlands; and H.E. Dr. Priscilla Schwartz, Attorney-General and Minister of Justice of Sierra Leone, together with Hina Jilani, an advocate of the Supreme Court of Pakistan and a member of The Elders. Members of the Task Force comprised a distinguished group of justice leaders and experts from around the world.

The full text is available here: <https://www.justice.sdg16.plus/report>

Recommendations

	<p>On behalf of the Pathfinders for Peaceful, Just and Inclusive Societies, we urge the drafters of the IDA19 Deputies' Report to use the data, costing and evidence of the Justice for All report to highlight the critical importance of providing justice for all for the creation of jobs and economic transformation, for the achievement of gender equality, for the prevention of fragility, violence and conflict and to improve governance and institutions. As such, IDA19 should include concrete measures to invest in people-centered justice systems that are focused on solving and preventing people's justice problems and enabling them to participate fully in their economy and society. We also urge the drafters to acknowledge the political leadership on SDG16+ and incorporate the key messages of the Joint Statement.</p>	
Results Measurement System (RMS)		
<p>Sight-Savers (UK)</p>	<p>We welcome the inclusion of an indicator on disability in the RMS, this is a crucial step-forward for ensuring disability is cross-cutting. Universal access is vital, however it is not sufficient to measure progress across all themes. We recommend adding further disability specific indicators and disaggregating some indicators across tiers:</p> <ul style="list-style-type: none"> • Tier 1: Add a column for disaggregation by disability and disaggregate a number of indicators. Focus on indicators which will be disaggregated by sex and are being collected for the SDGs. We suggest adding an indicator on the number of IDA countries integrating the Washington Group Questions or Model Disability Survey into national censuses or surveys. This would be easily measured and measure progress in IDA countries. • Tier 2: Number of IDA countries provided with statistical support by the WBG for the collection of data on disability; Disaggregate Indicator 6 – Beneficiaries in IDA countries of job-focused interventions (million) by disability in order to mirror the commitment made in the JET policy commitment. • Tier 3: Percentage of IDA-supported projects with disability inclusive beneficiary feedback indicator at design; Percentage of IDA-supported projects reporting disability inclusion in project objectives. 	<p>Noted with thanks. The disability dimension of IDA projects will be addressed and reported through the Environmental and Social Management System and various project documents. Under the approach all new IDA-financed investment projects will be screened for their impact on, and risk to, people with disability, and, if any, to avoiding, managing or mitigating this risk, including by enabling the disabled to share in project benefits. Progress on this work will be provided at the IDA19 MTR. Disaggregation by disability status will require significant work including building capacity and system of client countries.</p>
<p>Tearfund, CAFOD, Bretton Woods Project</p>	<p>As noted on pp. 47-48 of the Draft Deputies' Report, IDA19 will seek to increase battery storage and renewable energy generation and integration. However, we are concerned that the Draft Deputies' Report lacks sufficient indicators to account for and track the extent to which off-grid and mini-grid sources contribute to this IDA commitment; this is important, as the commitment's sole targets are on additional generation and battery storage capacity, which in itself does not translate into new or improved energy access. The only RMS indicator related to energy access included in the Draft Deputies' Report is, 'People provided with new or improved electricity service (million)' (see Table A1.2.b, p. 98). It is crucial for making progress on SDG7 to move towards more impact-focused indicators that track levels of service received by end users - in terms of reliability,</p>	<p>Noted with thanks. In addition to the indicator mentioned, there are a few other energy-related indicators on energy in the IDA19 RMS ("proportion of population with access to electricity" in Tier 1; "Generation capacity of renewable energy (GW)" and "Projected energy or fuel savings (MWh and MJ)" in Tier 2).</p> <p>As a tool to summarize and report on highlights of IDA's large and diverse portfolio (over 1000 active projects for US\$ 124 billion), we need to balance comprehensiveness and level of</p>

	<p>affordability and sustainability, particularly in HICs identified by World Bank ESMAP, where energy access rates are lowest.</p> <p>We recommend that the draft RMS indicator be revised from: “People provided with new or improved electricity service (million)’ to the following: “People [in HICs] provided with an affordable, reliable and sustainable electricity service (million)” We also advocate that additional RMS indicators are added for IDA19: “People [in HICs] provided with affordable, reliable and sustainable clean cooking solutions (million)” “Amount of investment in distributed renewable solutions (including off-grid and mini-grid)” We feel these indicators are necessary to more clearly demonstrate IDA19’s impact on meeting SDG7. Affordability and reliability of electricity services are vital to improve energy access of the poorest and in order to reach energy for all goals in the next ten years.</p>	<p>granularity with the need for aggregation and selectivity to keep the RMS manageable.</p> <p>We agree that other dimensions beyond access (affordability, reliability, sustainability) are critical and IDA is increasingly focusing on those aspects at each country and project level. However, progress and data availability vary significantly across countries and it is not possible to report on these dimensions at the aggregate level in the RMS. A suggestion for clean cooking solutions indicator is noted and will be reviewed for the future RMS.</p>
<p>Save the Children</p>	<p>Focus on equity as the number one priority across the IDA19 portfolio Agenda 2030 and the Twin Goals will not be achieved unless we see accelerated action for the furthest behind. IDA19 needs to make equity its number one priority for all its themes, to drive convergence in development outcomes between the poorest groups and their more advantaged peers. In regards to policy design this means reducing inequalities in outcomes across all IDA themes, placing emphasis on tackling persistent discrimination linked to gender and disability (which is a very welcome focus), and disaggregating data by groups. Equitable resource allocation requires prioritising resources to the most deprived and marginalised groups, and those regions where need is highest. The key indicator of success for IDA19 should be that: (1) it is increasingly tackling inequity in national budget allocations, and (2) generating outcomes to drive convergence in line with the pledge to Leave No One Behind.</p>	<p>Noted with thanks. There are several IDA19 Policy Commitments that focus on countries with the lowest Human Capital Index (HCI) or FCS, including one aimed to strengthen national budget allocations devoted to reducing inequalities in human capital investments which is a key driver of enhancing equity and ensuring that no one is left behind. This will be monitored and reported as part of IDA19 Policy Commitment updates. Several RMS indicators focus on equity related to basic services and infrastructure which are critical to the welfare of the poor and vulnerable population. Also, there is a strengthened focus on outcomes beyond access to the extent possible (e.g., <u>focus on learning along with access to schooling</u>).</p>
<p>Oxfam</p>	<p><i>Increasing human capital financing</i></p> <p>The amendment of the IDA19 commitment in the Governance and Institutions special theme to focus on improving “<i>sustainability of human capital financing</i>” targeting education and health outcomes is an important addition. However, it remains an insufficient initiative without a parallel commitment to increase the resources available for public education and health in IDA countries. Oxfam recommends the following amendment of this commitment (underlined), to also be reflected in the corresponding RMS indicator:</p> <ul style="list-style-type: none"> • <i>Support 15 IDA countries with the lowest Human Capital Index to <u>sustainably increase</u> human capital financing, including a focus on reaching universal health coverage and good learning outcomes for all, through: (i) improving the efficiency of public expenditures, and ii) more effectively aligning expenditures with domestic financing and external resources in a sustainable manner.</i> 	<p>Noted with thanks. This is an important issue that has been addressed through a proposed IDA19 Policy Commitment “Support 15 IDA countries with the lowest HCI to improve sustainability of human capital financing, including a focus on reaching universal health coverage and good learning outcomes for all, through: (i) improving the efficiency of public expenditures, and (ii) more effectively aligning expenditures with domestic financing and external resources in a sustainable manner.” This will not be specifically included as an RMS indicator, however, will be monitored and reported on as per IDA19 Policy Commitment updates.</p>

	<ul style="list-style-type: none"> • Add a corresponding RMS indicator: <i>percentage increase of national budget expenditure for education and health respectively</i> <p>Measuring Equity in DRM programs</p> <p>The commitment to strengthen domestic resource mobilization (DRM) in IDA countries is welcomed. The emphasis on addressing “the equity impacts of taxes and spending” and on supporting countries “to collect not only more, but better tax revenues” is applauded. However, the success of DRM programs in IDA countries should be measured by indicators that reflect both aspects: “collecting more” (higher tax revenues) and “collecting better” (equitable tax systems). The proposed RMS indicator only captures the former and fails to measure any equity impacts. Oxfam recommends the following:</p> <ul style="list-style-type: none"> • The World Bank is the proposed custodian for the newly recommended SDG 10.4.2 indicator on the <i>'redistributive impact of fiscal policies'</i>¹ and will hence be responsible for ensuring systematic collection of data on redistributive impacts of taxes and transfers in all IDA countries. Thus, we propose including the tax component of SDG10.4.2 indicator into the RMS indicator for the DRM policy commitment: <i>“number of IDA countries that improve redistributive impact of tax policies”</i> <p><u>CLIMATE CHANGE: Measuring accessibility of energy generated</u></p> <p><i>a. Disaggregating by grid-type</i></p> <p>We commend the World Bank’s commitment to support the generation, integration, and enabling infrastructure for at least of ten gigawatts (GW) of renewable energy in IDA countries. Oxfam recommends disaggregating the data on gigawatts produced by type of energy hence the following amendment of the RMS indicator:</p> <ul style="list-style-type: none"> • Generation capacity of <u>sustainable</u> renewable energy (GW) <i>This indicator should be disaggregated by on-grid, off-grid and distributed renewable energy</i> <p><i>b. Ensuring accessibility of energy generated</i></p> <p>Secondly, whereas the commitment aims to “facilitate further penetration of renewable energy access in IDA countries,” the policy package is silent on clear targets for improving and measuring access to energy at a household level. The Jobs and Economic</p>	<p>Noted with thanks. The new SDG 10.4.2 indicator is still being reviewed and will be included in the 2020 Comprehensive Review in March. Once ratified by the UN Statistical Commission, it will be considered for inclusion in the IDA RMS in the future.</p> <p>As a tool to summarize and report on highlights of IDA’s large and diverse portfolio (over 1000 active projects for US\$ 124 billion), we need to balance comprehensiveness and level of granularity with the need for aggregation and selectivity to keep the RMS manageable.</p> <p>We recognize that other dimensions beyond access (affordability, reliability, sustainability) are critical and IDA is increasingly</p>
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¹ recommended by UN IAEG in October 2019 for decision by UN Statistical Commission in March 2020

	<p>Transformation theme includes a tier 2 indicator for electricity access: “People provided with new or improved electricity service (millions).” Oxfam recommends that:</p> <p>(i) A similar RMS indicator should be included in the Climate Change theme and modified as follows:</p> <ul style="list-style-type: none"> • <i>People provided with new or improved <u>affordable, reliable</u> electricity service <u>via renewable energy</u> (million)</i> <p><i>This indicator should be disaggregated by:</i></p> <ul style="list-style-type: none"> • <i>New vs. improved electricity service; and</i> • <i>Household income level</i> <p>(ii) The RMS indicator on the Jobs and Economic Transformation theme, which has an impact on energy access, should be amended as follows:</p> <ul style="list-style-type: none"> • <i>People provided with new or improved <u>affordable, reliable</u> electricity service (million)</i> <p><i>The indicator should be disaggregated by:</i></p> <ul style="list-style-type: none"> • <i>New vs. improved electricity service;</i> • <i>Technologies used; and</i> • <i>Household income level</i> 	<p>focusing on those aspects at each country and project level. However, progress and data availability vary significantly across countries and it is not possible to report on these dimensions at the aggregate level in the RMS. A suggestion for clean cooking solutions indicator is noted and will be reassessed for consideration in future RMS.</p>
<p>Jean-Francois Tardif (National Coordinator of Global Poverty Solutions, Canada)</p>	<ul style="list-style-type: none"> • Adjust the Results Management System (RMS) so it reflects the priorities of the Africa Human Capital Plan (AHCP). a) Under-Five Mortality and Stunting: These indicators are currently under Tier 1 (i.e. contextual indicators, not addressed by Bank programming); they should be moved to Tier 2 as they are direct operational indicators of success in the Africa Human Capital Plan; b) The Africa Human Capital Plan targets beneficiaries in the bottom quintile, not all beneficiaries like the RMS (beneficiaries tend not to be the poorest); and c) Women and Children who have received basic nutrition service should be tracked separately to assess potential impact on child stunting, a goal of AHCP . • Revisit the Results Management System’s “Expected Range/Value for IDA 19” column to factor in the goals of Africa Human Capital Plan. The RMS appended to Deputies’ Report talks about providing 15-20 million people (Expected Range) with improved access to sanitation. The African Human Capital Plan targets a decrease of the open defecation rate from 22.9 % of the population to 15% of the population. Applying these percentages to the 60% of the African population covered by the Human Capital Plan leads to a gain in access to sanitation at least three times higher than the one projected by the RMS. How can this lack of ambition in the RMS be explained? As the access to sanitation 	<p>Noted with thanks. While African countries constitute the majority of IDA countries, we do not include any regional specific targets/priorities in the RMS such as the those under Africa Human Capital Plan. Those are best left as Regional updates and other Regional-specific progress monitoring and reporting. As a tool to summarize and report on highlights of IDA’s large and diverse portfolio (over 1000 active projects for US\$ 124 billion), we need to balance comprehensiveness and level of granularity with the need for aggregation and selectivity to keep the RMS manageable.</p> <p>There are several IDA19 Policy Commitment that focus on countries with the lowest Human Capital Index (HCI) or FCS, including one aimed to strengthen national budget allocations devoted to reducing inequalities in human capital investments which is a key driver of enhancing equity and ensuring that no one is left behind. This will be monitored and reported as part of IDA19 Policy Commitment updates.</p>

	<p>indicator shows, the goals of the RMS appear to not have taken into account those of the Africa Human Capital Plan. It would be advisable, as a good planning exercise to revisit other Tier 2 goals in light of the African Human Capital Plan: for instance if under-five mortality is to be reduced by 40% in Africa, it would be useful to calculate what the target should be for the number of deliveries attended by skilled personnel should be.</p>	
BIC	<p>We welcome the continued commitment of IDA to ensuring projects have beneficiary feedback indicators at design, and that the Tier 3 indicator measuring beneficiary feedback is disaggregated by FCS. However, after two IDA replenishment cycles, almost 100% of projects have achieved this target. We agree with the narrative under the Governance and Institutions heading about the need for citizen engagement in IDA projects to be both “broadened and deepened with concrete steps,” and therefore strongly urge the IDA19 RMS to focus on the implementation of project indicators, rather than continuing to only focus on the existence of indicators at design. The beneficiary feedback indicator should be edited to reflect a focus on implementation, and the target for projects implementing beneficiary feedback in implementation should be set to at least 75%.</p>	<p>We agree on the need to focus increasingly on beneficiary feedback during implementation and encourage broader and deeper engagements with beneficiaries and civil society. At the same time we will need to continue paying attention to new projects at the design stage, especially as the portfolio rapidly expands. Implementation of beneficiary feedback will be monitored at the project level through the Implementation Status and Results reports and through monitoring under the Environment and Social Framework.</p>
<p>SECTION IV, V</p> <p>PSW</p>		
The ONE Campaign	<p>While important improvements have been made to the PSW, including support for enhanced transparency and an independent evaluation by the mid-term review, we strongly recommend:</p> <ul style="list-style-type: none"> • The inclusion of governments, civil society and beneficiary communities (instead of only private firms) in the development of projects – i.e. decision making around project selection, subsidy design and targeting – to maximize development outcomes; • A transparent process to calculate the level and recipients of PSW subsidies using competitive approaches or open offers. This should be underpinned by the open contracting data standard to ensure fairer deals; and • If the full PSW allocation is not exhausted (meeting transparency and impact criteria) then the remaining money should be made available to governments after a certain amount of time. 	<p>Noted with thanks. IFC has established new “upstream units” to focus on identifying private-sector led solutions to key development challenges in collaboration with the World Bank, government, private sector clients, and other stakeholders. Currently, all IFC and MIGA projects continue to have (i) an Article III government notification (for IFC) and Host Country Approval (for MIGA) requirement, and (ii) a 30 to 60-day project disclosure requirement which provides opportunity for project-affected parties / beneficiary communities, civil society and indeed any external party to engage.</p> <p>Rigorous governance standards are applied to the use of PSW resources. This includes alignment to country strategy and compliance with Blended Finance Principles. IFC also uses benchmarks to ensure there is no windfall to IFC, co-lenders or private sponsors. In addition, some PSW projects are originated through competitive bidding such as Scaling solar, other through due diligence of a range of financial institutions, sector -based approaches and also market based opportunities.</p> <p>IDA reallocates resources across windows according to experience / demand, and indeed in IDA18, a reallocation was</p>

		made from PSW to IDA country allocations which support programming with IDA's client governments.
TCX	We propose more flexibility to support programmatic interventions by IDA (Para 141 and summary): Some INSTRUMENTS which are built on GLOBAL risk diversification are very likely to have <u>MORE</u> than 20 percent of total investments outside of IDA PSW eligible countries. However, a cooperation with such program and the participation in a global risk pool would make financial and economic sense for IDA. We thus suggest to foresee the possibility creating a carve-out for such type of programmatic investments.	Thank you for your comment. The limit of 20 percent outside PSW countries has been imposed to maintain focus on IDA only and IDA FCS, as requested by IDA Participants.
Graduation		
Results Canada	IDA needs to ensure that its transition policy is coordinated with other major multilateral donors As more countries see sustained levels of economic growth that makes them ineligible for IDA support there is an increasing need for IDA to ensure that this transition does not impact the sustainability of country growth. While a commitment to ensuring that countries have access to the financing they need through the transition process is welcome, there is still an overall coordination gap between IDA and other major multilateral donors. This is particularly important given the fact that various multilaterals use the same economic criteria to decide when a country is ready to transition, meaning that governments are facing a decrease in funding levels from a variety of sources. IDA 19 must mitigate the risks of simultaneous transition through comprehensive, cross-mechanism planning. This includes working closely with the Global Fund to Fight AIDS, Tuberculosis and Malaria, The Gavi, Vaccine Alliance and the Global Financing Facility to ensure transition policies are coherent and complementary.	Noted with thanks. IDA is conducting continuous dialogue on graduation policy issues with other multilateral donors. That dialogues aims to help achieve (i) convergence in graduation policies with other multilateral development banks, so that graduation from concessional windows of these institutions involves only gradual rather than abrupt changes in terms and amounts of financing available to the client countries, and (ii) common understanding with grant-providing multilateral donors that their graduation policies should not use graduation from IDA as a reference point but rather be based on analysis of all factors relevant to their mission and to the impact on the client countries' development outcomes of their assistance or withdrawal thereof. We will continue this dialogue during the IDA19 replenishment period.
Contributions and IBRD transfers		
TCX	We welcome that the report reconfirms IDA's commitment to the principle of additionality (para 176). This is important to avoid duplicating efforts, reducing possibilities to fully exploit economies of scale in existing instruments, and crowding out markets. Good progress was made in formulating a waterfall approach to assess additionality. Moreover, in this context, for completeness sake, the report should mention that TCX is already offering long-term (20y+) currency risk hedging solutions at market/risk reflective prices in almost all IDA currencies and expressed interest of working with IDA to deliver financing denominated in local currencies.	Noted with thanks. It is impossible for this report to include references to all the good work being done by organizations and partners around the world.