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GENERAL COMMENTS

1. I found it difficult to comment on the standards without some indication of the monitoring process and sanctions/penalties if they are not followed after funding has been provided. I consider the metrics and process for monitoring to be crucial otherwise the standards are relatively meaningless. Related to this is the measuring of the "doing good" effect which is often outside of the standards. This was a critical issue in evaluation of PPIs with which I have been involved, both in design and implementation.
2. For me it would also have been helpful to have had some idea of the weighting of the different elements when making a decision on the viability of a project e.g. return on capital v doing good v standard compliance (or even doing better than the standard).
3. The use of internationally agreed standards is what I expected but they are often the result of compromises and I hope that "best practice" or better is what you will aim for.
4. I consider that membership of the expert committee will be critical to achieving effective governance.
5. Details of the time frame for standard application and compliance would also be useful in evaluating their value. Also how the standards will apply after the period of funding terminates.
6. I suggest that details of application of standards to contributory projects funded by other players needs to be specified.
7. A process for dealing with unanticipated consequences which violate the standards should be considered. This may already be part of your risk management documentation.
8. I suggest that the way in which local stakeholders/communities will be involved in the process (e.g. selection, monitoring standard compliance, measurement of "success") from project submission to completion needs to be specified.
9. The IFC standards are much more detailed. I am not clear why this detail has been lost. I am concerned that the project proposers will not take the time to read the detail in the IFC (and other standards/best practice referred to) and will make decisions on the basis of insufficient information and thus delay the whole accreditation process (as I assume the reviewers will be using the detail in the IFC and other documents).
10. In my assessment much of the content of these standards is descriptive rather than action orientated.
11. IFC 1 has not been specifically referenced, presumably because it will be addressed in the overall Fund Policy document.

INTRODUCTION

1 In order to evaluate the standards it would have been helpful to have had a clearer idea of the overall risk management and due diligence approaches to be used by the fund assessment process. From a review of documents related to your funds you are obviously skilled in this area. However, as companies have different approaches to these aspects of fund management it would have been useful to have had more details of your specific approach. I was not quite clear from the power-point presentation if you were using due diligence in its more limited business sense or the wider meaning of taking reasonable action to keep property safe.

2 It would have been useful to have had examples of how the standards interface with the "proactive" stance mentioned in bullet 2 page 1.

STANDARDS INTRODUCTION

1 I was disappointed in the approach to climate change. Without sight of the overall Policy Framework "under which this will be managed" it is difficult to comment in detail. However, I found the footnote wording rather weak: "support", "sensitive to", "do not contribute to increasing". I would have hoped for a more pro-active stance on reducing climate change impacts (rather than preventing increasing) from the start point baseline. I recognize that there are specific climate change related funds but consider that land degradation is often so closely linked to climate change factors that the issue should have been incorporated into the standards, maybe 8, or as a separate standard. See also my comments of standard 8.

STANDARD 1

I found the wording weak "consider", "identify", "take into account", "may propose". There appears to be no requirement to prevent biodiversity loss or even to provide counterbalancing measures (a process which inherently has significant problems) which I find strange for a fund directed at prevention of land degradation. Sustainable can have different meanings for ecologists and investors so the use in this context should be clarified.

STANDARD 2

I think that "Ensure" is a good strong term. Documentation is also good (e.g. digital archiving of cultural heritage - oral, photographic, etc.) if there are proper procedures and financing. This is especially the case if sites or access to sites are affected. MIASU has been involved in a number of projects on archiving cultural heritage and now recognizes that it needs careful and skilled management.

2 Sometimes there are competing cultural heritage issues if the project encompasses a wide area. This is not addressed in the standard.

3 I think that Point 3 at the end of the standard is not clear. How will "certain" be applied. What are the criteria for deciding which will be included (why not all?)

STANDARD 3

I think this corresponds to IFC PS # 4 not 5.

I am not clear why climate change is mentioned here and once it is mentioned it is not really followed up.

I suggest that the use of "good international industry practice" needs to be clarified rather than just a loose reference to the World Bank EHS.

I would like a definition of "vulnerable" and the use of "relevant" in the last sentence is not clear to me.

STANDARD 4

I think a clarification of how "vulnerable groups" as used in this standard would be helpful. For instance British Law (Safeguarding Vulnerable People Act 2006) has a specific definition of "vulnerable people" which may not be relevant to this standard.

The standard requires an assessment but does not specify mitigating action on the basis of the findings of the assessment, apart from consent being given. The idea of consent also needs clarification - would this be a majority in favor (maybe the less vulnerable in the community).

The issue of potential competing interests of different indigenous or vulnerable groups needs to be addressed in the standard.

STANDARD 5

I suggest a reference to the ILO definition of "fundamental" would be useful.

I think the use of "sound" worker/management relationships is problematic, although I recognize that this is used in the IFC standard. Management theory has many ideas, often conflicting, on what sound management entails. Managers often have a different view from workers and this can differ from other stakeholders.

I am also concerned that this standard allows child labor (again I recognize that this is also included in the IFC standard).

I suggest replacing "objectives" in the final sentence with "requirements" and "promote" in the final bullets with "demonstrate" and "avoid" with "prevent".

STANDARD 6

I was initially surprised that "involuntary resettlement" is allowed at all but on reviewing the IFC standard I see that this is in situations where the affected people do not have "legal" rights to occupy the land (my simplistic interpretation of the IFC contents). This is an one example of where the use of condensed language in these standards loses the complexity of the issue (see my general point 9).

I recognize that government often plays a central role, but also (from my experience in China), this may not follow "best practice". The fund may need to consider whether certain countries, which do not follow best practice on involuntary resettlement, ought to be excluded from the projects.

The standard does not recognize the "land held in common" issue.

If forced relocation is allowed the standard seems to go against the principle of "informed consent" in standard 4.

"Goals" is not strong enough.

My experience of resettlement programmes in China is that monetary compensation is

insufficient and that much more attention needs to be made to the social consequences of relocation: psychological, social bonds, animal bonds, loss of livelihood, loss of attachment to the land and natural connectivity etc..

The calculation of compensation is complex as new land maybe of completely different quality.

STANDARD 7

There seems to be an overlap with Standard 6.

As mentioned in my comments on Standard 6 the issue of involuntary resettlement is directly related to instances where the individual is not protected by law. It is therefore not clear how Standard 6 operates in the light of Standard 7.

Top of page 12: the requirement to be non-discriminatory, gender sensitive, marital status may go against standard 4 where indigenous groups may not have these values.

Para 3 page 12. There needs to be some detail on how access to justice will be achieved, especially if the judiciary are corrupt in the relevant country. Also the standard needs to make clear who will pay for the legal process.

I am not clear why the last paragraph is included. I suggest that this is more appropriately positioned in the introduction or the policy document.

STANDARD 8

I would suggest that climate change mitigation or improvement, as well as GHG, is included in this standard. The aim should be for carbon neutral, or better, projects.

The focus seems to be more on efficiency than sustainability. I would suggest that this is adjusted. Possibly sustainable could be used in the title of the standard to emphasize this focus.