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Suzanna Dennis, Gender Action
Comments on the International Finance Corporation's Draft
Policy and Performance Standards on Social & Environmental Sustainability

Women constitute 70% of the world's poor. It has clearly been shown that greater gender equity in poverty eradication efforts will be reflected in reduced poverty and faster economic growth. To discount and not integrate gender into development efforts significantly hinders the level of long term, sustainable success that a country can have on poverty.

The International Finance Corporation's (IFC) Draft Policy and Performance Standards on Social & Environmental Sustainability (PPS) are alarmingly weak and lacking in gender considerations. The only mention of gender is in Performance Standard 1, which recognizes that the client's social and environmental impact assessment (S&EA) must identify vulnerable groups (including women) who may be disproportionately impacted by the project. In order to ensure that IFC financed projects do not reinforce the feminization of poverty, the proposed Performance Standards (PSs) must recognize the rights of women defined by international law and ensure women participate in the formulation, implementation and monitoring of such projects.

Below are some key areas that must be engendered, focusing on Performance Standard 1. While some of these suggestions may seem obvious, experience has shown that when gender is not made explicit it is usually neglected.

Engendering Impact Assessments

Overall the provisions for impacts assessments are very weak and tend to rely on the client, which is a conflict of interest. Specifically regarding gender issues:

- The PPS must clearly state that it is the responsibility of the IFC to ensure that the human rights of women and other vulnerable groups are respected and protected.
- The IFC must identify vulnerable groups such as women, as opposed to leaving that responsibility to the client in the PS on Social and Environmental Review (S&ER)
- PS1 must mandate that a gender expert provide input into the IFC's S&ER as well as the client's S&EA and require measures to reverse or mitigate negative gendered impacts.
- PS1 must require that the S&E Management Program work with the gender expert to define and monitor desirable outcomes that promote women's rights and gender equality.
- The PPS lacks mechanisms for women and men who are affected by IFC financed projects to hold the client accountable. Every time the PPS says, "the client will...." the next sentence must articulate who will ensure that the client's responsibility will be fulfilled, and what the IFC will do should the client neglect to carry out their responsibility.

Engendering & Strengthening Community Engagement

Overall, the Community Engagement section of PS1 is weak and neglects to refer to women specifically. Since projects affect men and women differently, both women and men from project-affected communities have a right to be involved in the design, implementation and monitoring of projects that affect them.

- The Community Engagement section of PS1 must include binding measures to ensure that the community consultations include women specifically where men tend to predominate
- The PPS must ensure that affected men and women can influence the shape of a project at all stages and the IFC directly responds to their perspectives at all project stages.
- The PPS must clearly state that if affected women and men find a project unacceptable, the IFC will withdraw its financing.
- The stipulation for the grievance mechanism is disturbingly weak, particularly because it is a conflict of interest for the client to establish and administer its own system. PS1 must strengthen its grievance mechanism through making it transparent, accountable, binding and accessible to women and men. For example, affected women should feel safe submitting a complaint.

Mitigation & Reversal of Gender Impacts

Women and men experience the impacts of development projects and resettlement differently.

- Performance Standard 5: Land Acquisition and Involuntary Resettlement must ensure the protection of the rights of women and men, particularly when it comes to issues of livelihood impacts, land titles, property rights, and compensation systems, as well as issues of participation, consultation, and decision-making.
- The policy must clearly state that resettlement plans must be designed to mitigate and reverse the differential impacts of displacement on women, children, the elderly, those with medical conditions or disabilities, and other vulnerable groups.
- The PPS must articulate measures to mitigate or reverse the potential gendered 'externalities' of all projects deemed to have a disproportionate impact on women and other vulnerable groups. For example, large infrastructure projects tend to rely on a male migrant labor force, which can increase the demand for impoverished female and child sex workers, violate their rights and cause death and disease through spreading HIV/AIDS.
- The PPS must ensure that, if used, private and government security forces are trained to be gender sensitive, and that special measures are taken to ensure the personal security of women and children.