

Unmet Gender Promises:

Making IFI policies and projects deliver on gender equal rights



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Authors: Elaine Zuckerman and Thanh Mai Bercher, Gender Action
Researcher: Thanh Mai Bercher
Editor: Dr Ellen Lammers
Contributing Editors: Christian Donaldson, Oxfam; Kate Geary and Petra Kjell, Recourse

Co-Sponsoring Organizations:
Gender Action, NGO Forum on ADB, Oxfam, Recourse



Cover photo: Betty Abah
Women fishers at Badagry, Nigeria lose livelihoods from the World Bank-financed West Africa Gas Pipelines

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List of Acronyms and Abbreviations

ADB: Asian Development Bank
AfDB: African Development Bank
AIIB: Asian Infrastructure Investment Bank
BOAD: West African Development Bank
CDB: Caribbean Development Bank
CEDAW: Convention on the Elimination of all Forms of Discrimination Against Women
CSO: civil society organization
CSP: Country Strategy Policy
EBRD: European Bank for Reconstruction and Development
EIB: European Investment Bank
ESF: Environmental and Social Framework
ESP: Environmental and Social Policy
ESS: Environmental and Social Standards
FI: Financial Intermediary
FPIC: Free, Prior, and Informed Consent
GE: gender equality
GERs: gender equal rights
GM: gender mainstreaming
GP: gender policy
IDB: Inter-American Development Bank
IFC: International Finance Corporation
IFI: International Financial Institution
LGBTQ+: lesbian, gay, bisexual, transgender, queer, and more (*the + signifies inclusion of intersex, asexual, pansexual, and additional identities within the LGBTQ+ community*)
M&E: monitoring and evaluation
NDB: New Development Bank
OP: Operational Policy
PPP: Public-private partnership
RBA: rights-based approach
SGBV: sexual and gender-based violence
SGM(s): sexual and gender minorities
SOGI: sexual orientation and gender identity (*used by IFIs such as the IDB and World Bank*)
TA: technical assistance
WB: World Bank

Executive Summary

This report demonstrates that projects funded by International Financial Institutions (IFIs) often undermine the livelihoods and health of women, men, and sexual minorities (SGMs). One major reason is that the IFIs' decades-long paradigm, starkly exposed by today's COVID-19 pandemic, has imposed austere public social spending cutbacks and privatization of services and infrastructure, which have ultimately benefited corporations more than poor women and men whose lives IFIs claim to improve. This result is all the more unacceptable given that IFIs are the world's largest taxpayer-supported public development funders. We therefore call for an IFI paradigm shift to sustainably support public goods that genuinely improve the lives of poor women, men, and sexual and gender minorities (SGMs).

This call results from analyzing the gender policies and gender-sensitivity of IFI Environmental and Social Frameworks (ESFs) and examining case applications of these policies. Based on our analysis, the report presses IFIs to improve their gender policies and the gender-sensitivity of their ESFs, and to mandate robustly implementing them throughout operations.

Methodology:

The analysis in this report covers a total of twelve IFIs: the two major global World Bank Group facilities (the World Bank and International Finance Corporation (IFC)), two newer China-headquartered emerging global IFIs (the Asian Infrastructure Investment Bank (AIIB) and New Development Bank (NDB)) and another eight significant regional development banks. Gender Action developed two sets of ecofeminist rights-based indicators to analyze and score IFI gender policies and the gender-sensitivity of their ESFs as Strong, Adequate, or Weak. The gender policy analysis included 12 policy documents covering 10 IFIs, scored by 10 indicators. The ESF analysis covering 12 IFI frameworks, was scored by 11 indicators. The reason for including fewer IFIs in the gender policy analysis is that the two newer IFIs, the AIIB and NDB, completely lack gender policies although CSOs have pressured both IFIs to adopt them.

Insights from scoring gender policies and ESFs include:

- **On gender policies:** The Asian Development Bank (ADB), African Development Bank (AfDB) and Inter-American Development Bank (IDB) have relatively stronger gender policies than do other IFIs. They commendably emphasize gender equal rights and women's empowerment complementarily. The IDB and European Investment Bank (EIB) also laudably score strongly for mandating implementation of their gender policies.
- **On gender-sensitivity of ESFs:** A majority of IFIs received Weak ESF gender-sensitivity scores. The strongest ESF gender-sensitivity score was for Resettlement & Compensation, with half of ESFs scoring strongly on this indicator. Almost no ESFs received Strong scores for mandating projects to address gender issues or requiring projects to address gender dimensions together with environment, climate, consultation, consent, monitoring & evaluation, class, caste, and SGM issues.
- **On both gender policies and ESFs:** Not one policy received a Strong score for inclusion of and preventing discrimination against SGMs.

Insights on policy violations from case studies:

Another key insight that emerged from this report's analysis is that while robust IFI gender policies and gender-sensitive ESFs are essential prerequisites for IFI investments that benefit and do not harm men, women, and SGMs, their existence alone is insufficient. Strong policies and frameworks are only effective if they are implemented.

To assess IFI policy implementation, we juxtaposed outcomes of typical fieldwork-based cases

conducted by CLEAN (Coastal Livelihood and Environmental Action Network), Gender Action, Joy for Children, and Recourse with our policy analysis findings. The cases demonstrate that while many IFIs tout adherence to their gender policies and ESFs, too often IFI investments harmfully impact people on the ground because IFIs breach their own policies. The cases spotlight recurring gender policy and ESF violations, such as:

- **Women farmers' livelihoods suffered from loss of land, livestock, water, and/or fisheries**, as witnessed in the AIIB-financed Bhola Integrated Power Plant project in Bangladesh and the AfDB-West African Development Bank (BOAD) co-financed Sendou Power Plant project in Senegal. Women fought against the construction of these greenhouse gas emitting projects to no avail. Both these projects, as well as the World Bank-financed Lagos Metropolitan Development and Governance project in Nigeria, forcibly evicted residents causing large losses in women's earnings.
- **Health deterioration resulted from pollution** in both the Bhola and Sendou power plant projects, triggering respiratory diseases and expanding women's unpaid care work for sickened household members. In a rare accountability victory, a community complaint to the AfDB accountability mechanism forced the Sendou power plant to cease operations in 2019 as it was established that the AfDB had breached its gender and environmental safeguard policies.
- **Lack of transparent information and sham consultations** harmfully affected women and men in the Bhola, Lagos, and Sendou projects as well as in the IFC-AIIB co-financed Myanmar Myingyan Gas Power Plant project. In all these projects, IFIs failed to adhere to ESF information disclosure and gender-sensitive consultation commitments. Vital project information was either not disclosed or translated unintelligibly into local languages, while superficial consultations ignored gender-specific needs and concerns.
- **Sexual and gender-based violence (SGBV) recurred in IFI projects** which held sham consultations and conducted forced resettlement, such as the Lagos project that flouted the World Bank Involuntary Resettlement policy requirement to consult and compensate all displaced individuals. Instead, Lagos' Badia East slum was bulldozed in 2013 without warning. Some newly homeless women and girls were raped; having lost their businesses, others turned to sex work to survive. To this day, most evicted Badia East residents remain homeless. In the IDB-financed Haiti Caracol Industrial Park project, which also forcibly evicted residents, women suffered SGBV as the IDB flouted its gender policy commitment to preventing it. The World Bank-financed Second Road Sector Development Programme in Uganda has become synonymous with combating SGBV. After male construction workers abducted, raped, and impregnated some 30 schoolgirls who had to drop out of school, community members filed a complaint to the World Bank accountability mechanism. This, coupled with harmful publicity, pushed the World Bank to cancel financing part of the project, and launch a GBV Task Force.
- **Gender unequal labor practices** were exemplified in the AIIB-financed India Gujarat Rural Roads project where men much less qualified than women received higher level jobs with better pay.
- **Lack of gender-sensitive outputs** was also evident in the Gujarat project where women and children who use project roads to walk to school and markets became accident victims on project roads built without sidewalks.

Recommendations:

Considering the findings of both the gender policy and ESF scoring analysis and the cases showing IFI policy violations in practice, the report highlights the following recommendations:

- **All ESFs must address interrelated project gender, environment, and climate impacts.** ESFs hardly acknowledge or address women's primary roles protecting the environment and managing natural resources and biodiverse ecosystems. Our cases demonstrate that adverse climate and ecological

effects especially undermine women's livelihoods and health. Some ESFs consider gender-sensitive environmental assessments during resettlement, but rarely for environmental and climate issues.

- **ESFs must ensure full information disclosure and inclusive consultation in all projects.** Most ESFs scored Weak on gender-sensitive information disclosure and Adequate on promising gender-sensitive consultations, but in practice consultations are often held too late for affected people to consent to or refuse projects. The right to refuse could end the forced resettlement scourge described in this report's cases.
- **ESFs must strengthen the gender dimensions of their resettlement and compensation mechanisms.** Although ESF resettlement and compensation commitments are somewhat gender-sensitive, they neither target women- and girl-headed households nor require gender-equal compensation.
- **IFI policies must ensure that gender equal rights (GERs) complement their women's economic empowerment agenda.** Too many IFIs neglect GERs.
- **Gender policies and ESFs must ensure prevention of all forms of SGBV.** Only a few ESFs do so today. Cases repeatedly demonstrate SGBV's detrimental impacts especially on women and girls.
- **Gender policies must recognize and reward unpaid and underpaid care work.** Some policies recognize women's unpaid care work and promote technologies to alleviate it, but none promote monetizing and remunerating its economic contributions and distributing it across genders.
- **Financial Intermediary (FI) subprojects must adhere to IFI gender policies and ESFs.** Opaque FI subprojects compose increasing proportions of IFI portfolios. Because of opaqueness, there is a high risk that FI subprojects will fail to adhere to gender policy and ESF requirements and have harmful gender impacts.
- **Gender policies and ESFs must rule out discrimination of sexual and gender minorities (SGMs).** Only a handful of IFIs have begun protecting SGMs. All must expand policies and staff training to counter project discrimination against LGBTQ+ people and ensure they benefit from projects.
- **Gender policies and ESFs must collect gender-disaggregated monitoring and evaluation (M&E) data.** Half of IFI gender policies and no ESFs scored Strong for requiring baseline and subsequent M&E gender-disaggregated project data collection. Without this data, IFIs cannot identify and apply lessons to strengthen GERs and prevent harm. IFIs must disclose said data publicly.
- **All IFIs must ensure coherence between gender policies and ESFs.** While the IDB has the strongest IFI gender policy, other IDB policies scored Weak on gender sensitivity. The reverse applies to the EBRD.
- **Gender policies must commit ample core funding for GERs.** Only a third of policies scored Strong for doing so. All IFIs must allocate sustainable core funding to robustly promote gender goals institutionally and in all project phases, and avoid reliance on restricted, temporary, non-core funding.

The findings of this report emphasize that, while policy implementation is key, policies must first be robust. Since we are aware that several IFIs are currently updating their ESFs, we hope that the findings and recommendations of this report will be reflected in the improved ESFs. Inspired by our findings we call equally on IFIs that have gender policies to strengthen them, and on the AIIB and NDB, which currently lack gender policies, to create and implement robust mandatory gender policies.

Finally, we conclude that strong implemented gender policies will only be effective if IFI operational conditions increase rather than decrease public spending and reverse decades of privatization of services and infrastructure which makes them unaffordable to poor women, men and SGMs during and after the COVID19 pandemic.

1. Introduction

The world's largest public development funders are the taxpayer-supported International Financial Institutions (IFIs)¹. Their missions range from eradicating poverty to sharing prosperity to spurring sustainable economic development, social progress and sound investments. However, their projects in sectors such as the extractive industry (coal, oil and gas) and mega-infrastructure projects such as gas pipelines or hydropower dams, often harm the livelihoods, health and wellbeing of women, men, and sexual minorities.

Key mechanisms underpinning IFI investment decisions include gender policies and Environmental and Social Frameworks (ESFs)², which are the focus of the report. The report analyzes and scores 12 gender policy documents as well as the gender strengths and weaknesses of 12 ESFs, covering a total of 12 different IFIs. Robust IFI gender policies and gender-sensitive ESFs are essential prerequisites for IFI investments that benefit and do not harm men, women, and sexual minorities. However, their existence alone is insufficient, because even strong policies and frameworks are only effective if they are implemented, as this report's case studies demonstrate.

The main audience for this report are IFI officials and their government members. We hope that our analysis will trigger traditional IFIs to improve their performance on gender equality, and that new IFIs will be encouraged to adopt first-ever gender policies. This report should also interest "IFI-watchers", that is, CSOs and citizen groups who hold the public IFIs accountable for their investment impacts on people and the environment.

Today's COVID-19 pandemic spotlights disastrous health and environmental effects wrought by decades of IFI "neoliberal" austerity policies, which have instigated public spending cutbacks while pushing for the privatization of health, education, industrial, agricultural and other services and enterprises. This has benefited the corporate sector more than the destitute (Dennis and Zuckerman, 2006). In 2017, then World Bank President Jim Yong Kim said, "official aid money should be used to turn the billions of dollars provided by western countries [to the World Bank] into trillions of dollars of investment from the private sector" (Elliot, 2017). Kim's statement reflects at least two major forms of IFI investment involving private sector actors. First, IFI public-private partnerships (PPPs) that facilitate investments across sectors including in transport, water supply, health and education, with corporations providing services for fees playing a key role. Poor women, men, and sexual and gender minorities (SGMs) who cannot afford to pay get squeezed out. Second, Financial Intermediary (FI) investments, which direct public funds to intermediary financiers such as commercial banks and equity funds. The latter in turn lend to corporations, which execute infrastructure and extractive industry subprojects that are renowned for their destructive track record.

The gender policies and ESFs this report discusses are supposed to apply to all IFI funding including direct project financing, many of which are PPPs, as well as to FI investments. Both IFI PPP and FI investments lack transparency and accountability, undermining the rights and wellbeing of communities, contributing to contemporary inequalities and compromising attainment of key IFI mission goals such as sharing prosperity. Taxpayer-supported IFIs need to ensure the provision of high-quality

¹ International Financial Institutions (IFIs) are also known as Development Finance Institutions (DFIs) or Multilateral Development Banks (MDBs), where multilateral signifies their multiple-government ownership. This report uses the term IFIs.

² In this report, ESFs and Environmental and Social Safeguards (ESSs) are collectively referred to as ESFs.

public services for all, today during the COVID-19 era and post-COVID. While this report’s analysis does not delve into analyzing PPP financing and touches on FIs, our case studies illustrate them.

This report underlines that when people are displaced and/or lose public health services through IFI projects, women carry the burden of caring for household and community members (Lauterbach, 2012). One IFI emergency COVID-19 response is to increase funds for care services to facilitate women’s return to work. This sounds great. However, given that the bulk of IFI COVID-response funds are new loans rather than grants, and because some IFIs are not canceling countries’ existing IFI debt during this pandemic, they are essentially racking up borrower’s sovereign debt. Without canceling existing debt and only providing COVID-19 response grants to already deeply-indebted countries, IFI debt repayments will inevitably eat into social service spending, including national health budgets.

The main purpose of this report is to evaluate IFI gender policies and the gender sensitivity of ESFs to ensure all IFIs have and implement strong policies and frameworks to ensure their investments avoid harm and benefit the lives of women, men and SGMs. At the same time, the report challenges the wider neoliberal service and infrastructure development paradigm embraced by IFIs, in which their gender policies and ESFs are embedded. It needs to be challenged because case study examples in this report illustrate that IFI investments which ought to be guided by gender policies and ESFs continue to have harmful gender impacts.

2. Methodology

Our report contains two separate analytical sections: the gender policy analysis (section 3), and the Environmental and Social Framework (ESF) analysis (section 4). The gender policy analysis includes 12 documents covering 10 IFIs, scored by 10 indicators. The ESF analysis includes 12 documents from 12 IFIs, scored by 11 indicators. The two analyses have independent sets of selection processes, indicators, and scoring criteria, which are laid out in the sections below. One reason for including fewer IFIs in the gender policy analysis is that the AIIB and NDB have no gender policies (see more details in 2.2).

Our selection of IFIs includes the two major global World Bank Group facilities (the World Bank and International Finance Corporation), two newer China-headquartered emerging global IFIs (the Asian Infrastructure Investment Bank and New Development Bank) and eight other significant regional development banks listed in Table 1 below:

Table 1: IFIs analyzed in this paper

IFI	Gender Policy	ESF
African Development Bank (AfDB)	√	√
Asian Development Bank (ADB)	√	√
Asian Infrastructure Investment Bank (AIIB)		√
West African Development Bank (BOAD)	√	√
Caribbean Development Bank (CDB)	√	√
European Bank for Reconstruction and Development (EBRD)	√	√
European Investment Bank (EIB)	√	√
Inter-American Development Bank (IDB)	√	√
IDB Invest (formerly IIC)	√	√
International Finance Corporation (IFC)	√	√
New Development Bank (NDB)		√
World Bank	√	√

We recognize that a desk-based analysis and scoring of IFI policy documents runs the risk of comparing divergent IFI policy content and approaches. Therefore, while we analyze and score each of the individual IFI policies by uniform indicators, we confine our conclusions to IFI policy patterns and trends. In the final reckoning, it must be acknowledged that policies are only as good as their implementation, so assessing outcomes for women, men, and sexual minorities is an essential step for IFIs to determine whether their policies are inclusive and practices benefit and do not harm impacted community members. This is illustrated in the fieldwork-based case studies that have been included in the paper (see also section 2.5).

Before turning to a description of the selection and scoring methodology used, one methodological caveat on IFI information needs to be mentioned upfront. This report analyzes public IFI information. Civil society organizations (CSOs) have fought for decades to get IFIs to publicly disclose previously confidential policy and project information. The report's policy scoring - Strong, Adequate, or Weak – thus depends on transparent IFI information disclosure. Finally, aware that several IFIs are currently updating their ESFs, we hope that the findings and recommendations of this report will be reflected in their new versions.

2.1 Analysis Indicators and Scoring Criteria

Gender Action developed two sets of ecofeminist rights-based indicators to analyze and score IFI gender policies and Environmental and Social Frameworks as Strong, Adequate, or Weak. We created a detailed matrix of the separate scoring criteria for each indicator, with definitions and requirements for each score, and referenced them during the analyses. The full criteria are presented in Annex 1 (Gender Policy Indicator Scoring Criteria), Annex 2 (Gender equal Rights, an expansion of the rights referenced in Annex 1), and Annex 4 (ESF Indicator Scoring Criteria).

Points were gathered and compiled into tables (presented in Annex 3 for gender policies and Annex 5 for ESFs), and documents received scores based on how many points match the indicator criteria (for Strong, Adequate and Weak).

For the Gender Policy analysis, the 10 indicators include:

1. Goals
2. Priorities
3. Mandate
4. Mechanisms to Engender Operations
5. Staffing
6. Level of Gender Funding
7. Quality of Monitoring and Evaluation Mechanisms
8. Sexual and Gender Minorities (SGMs)
9. Sexual and Gender-Based Violence (SGBV)
10. Unpaid Care Work

For the Environmental and Social Safeguards analysis, the 11 indicators include:

1. Gender Mandate/Safeguard
2. Gender in Environmental & Social Risk Assessments
3. Gender Discrimination & Rights
4. Gender in Environment & Climate
5. Gender & Information Disclosure
6. Gender in Consultations & Consent (*FPIC a priori*)
7. Gender in Resettlement & Compensation
8. Gender Monitoring & Evaluation
9. Sexual and Gender-based Violence & Harassment
10. Sexual and Gender-Minority (SGM) Targeting
11. Gendered Labor

In the analyses in sections 3 and 4, each indicator has its own section that contains: a definition for the indicator, an explanation of the indicator's relevance, the scores assigned to each IFI for that indicator, and recommendations on how gender policies (section 3) and ESFs' gender sensitivity (section 4) should be strengthened.

Additionally, some indicators feature Case Examples, which highlight IFI project gender policy and ESF implementation issues (see section 2.5).

2.2 Selecting Gender Policies

We selected 12 gender policies, strategies, action plans, and operational plans (collectively referred to as 'gender policies') belonging to the following ten IFIs: ADB, AfDB, BOAD, CDB, EBRD, EIB, IDB and IDB Invest, World Bank and IFC (see also Table 1). It must be noted that the same World Bank Group's gender policy applies to both its public and private arms (World Bank and IFC), and similarly the IDB Group's gender policy applies to both IDB and IDB Invest.

In four cases, two documents per IFI were selected for review because we felt that the 'gender policy' on its own did not entirely represent the gender mechanisms in place used by IFI staff. Three IFIs have gender policies adopted ten or more years ago, which have been supplemented and/or enhanced by a gender operational plan, strategy, or action plan. While these documents do not necessarily replace the said gender policies, they updated guidance to staff, sometimes with a lesser mandate than do 'policies'. Additionally, many of the newer gender documents address gaps in the original gender policies. Therefore, we thought it was important to consider both the vintage and newer gender documents.

Two of the world's newest IFIs, the AIIB and NDB, completely lack gender policies. CSOs have pressured both IFIs, which began operating in 2016, to create and implement robust gender policies. Gender Action has met with senior AIIB managers annually to make the case for a gender policy. So far this has been to no avail, as reflected in the AIIB principal social specialist, Michaela Bergman's, statement to journalists in 2018: "You don't have to have a gender policy to look at gender. Within the environmental and social framework, there's enough requirement to look at differentiated impacts" (BIC Europe/NGO Forum/Gender Action N39). On the contrary, this report demonstrates that the AIIB's ESF references to gender tend to be weak. Together with BRICS Feminist Watch, Gender Action has also met several times with senior NDB managers to urge them to adopt a gender policy, again without success so far.

2.3 Selecting Environmental and Social Frameworks

Selecting 12 IFI Environmental and Social Frameworks (including both ESFs and Environmental and Social Safeguards (ESSs), was straightforward since we chose only each IFI's most recently approved ESF.

2.4 Ranking the IFI Gender Policies and ESFs

We succumbed to colleagues' requests to try to rank IFI gender policies' and the gender sensitivity of their ESFs. Cognizant that doing so is an imperfect exercise, we took the plunge to present rankings to

give an idea of which IFI policies provide stronger gender guidance to staff and borrowers than do others.

To rank the gender policies, we provided one point per indicator and tallied final scores out of ten points (presented in Table 2 below). In order to rank the IFIs included, it was necessary to combine the scores for IFIs having one or two gender documents in the analysis. Therefore, the IFIs with two documents were scored out of 20, while the IFIs with one document were scored out of 10.

Rankings are based on the percentage of Strong scores each IFI received. For example, between both of its documents, IDB received 18 Strong scores, 1 Adequate score, and only 1 Weak score. Overall, the IDB scored 90% Strong, 5% Adequate, and 5% Weak; compared to the other IFIs, it was the strongest in the Gender Policy analysis. Full rankings are presented below Table 2.

Ranking the ESFs, we followed the same procedure as for the gender policies, only that it was more straightforward as all IFIs have only one ESF document included in the analysis.

2.5 Case Example Selection

Our initial report focus was to strictly analyze and score the quality of IFI gender policies and the gender sensitivity of ESFs. As we proceeded, we decided to include a few existing project examples to demonstrate how IFI policies and ESFs were being implemented. Since a handful of recently updated ESFs just began implementation, the cases also reflect current impacts of projects subject to previous ESFs. We included cases because development effectiveness, after all, depends not only on sound IFI policies but also on these policies being rigorously implemented. The opposite is equally true: good policy implementation does not mean much if the policies themselves are weak. Gaps in IFI gender policies and ESF gender insensitivities will leave development on the ground gender-blind or insufficiently gender-sensitive.

The project cases featured are funded by the IFIs included in this analysis. We selected nine examples from past fieldwork-based case studies (by CLEAN Bangladesh, Gender Action, Joy for Children Uganda, and Recourse) by responding to two screening questions: First, do the case studies analyze IFI projects' gender-differentiated impacts? Second, were the case study projects implemented following dates of the policies that this report analyzes? Positive responses to both these questions qualified case examples for inclusion in this report.

3. Gender Policies - Analysis & Scores

The IFI gender policies analyzed and scored include: ADB (2019), AfDB (2001), AfDB (2014-2018), BOAD (2012), CDB (2008), EBRD (2009), EBRD (2015), EIB (2016), EIB (2018), IDB (2010), IDB (2017), World Bank (2015). The full titles of these documents – which include gender policies, strategies, action and operational plans - are provided in Table 2 and in the References.

This section first presents aggregate IFI Gender Policy scores based on assessment against the ten indicators (listed in section 2.1 and elaborated in Annex 1), followed by detailed indicator-by-indicator Gender Policy analyses. These analyses and scores are depicted in tables and graphs, followed by recommendations.

3.1 Aggregate Gender Policy Indicator Analysis & Scores

Table 2 summarizes whether each IFI Gender Policy scored Strong, Adequate, or Weak by indicator. The detailed assessment behind this summary can be found in Annex 3. The bottom three rows of Table 2 express the scores' strengths per IFI in percentage terms. The *primary* score received by each IFI Gender Policy is color-coded to match the highlighted categories of Strong, Adequate, and Weak.³

³ See Methodology chapter, section 2.4: For ranking purposes, the scores of IFIs with multiple documents were consolidated into one score, while the four IFIs with only one document were scored on that document alone.

Table 2: Gender Policy Indicator Scores

IFIs / Gender Policy Indicators	ADB	AfDB		BOAD	CDB	EBRD		EIB		IDB		WB
		Gender Policy (2001)	Gender Strategy: Investing in Gender Equality for Africa's Transformation (2014-2018)			Policy of the West African Development Bank in Terms of Gender (2012)	Gender Equality Policy and Operational Strategy (2008)	Gender Action Plan (2009)	Strategy for the Promotion of Gender Equality 2016-2020 (2015)	Strategy on Gender Equality and Women's Economic Empowerment (2016)	Gender Action Plan (2018)	
1. Goals	STRONG	ADEQUATE	STRONG	ADEQUATE	ADEQUATE	WEAK	ADEQUATE	STRONG	ADEQUATE	STRONG	STRONG	ADEQUATE
2. Priorities	STRONG	STRONG	STRONG	STRONG	ADEQUATE	WEAK	ADEQUATE	STRONG	STRONG	STRONG	STRONG	STRONG
3. Mandate	WEAK	ADEQUATE	WEAK	ADEQUATE	ADEQUATE	ADEQUATE	STRONG	STRONG	ADEQUATE	STRONG	STRONG	WEAK
4. Mechanisms to Engender Operations	STRONG	STRONG	STRONG	STRONG	STRONG	ADEQUATE	ADEQUATE	ADEQUATE	WEAK	STRONG	STRONG	ADEQUATE
5. Staffing	ADEQUATE	WEAK	STRONG	ADEQUATE	STRONG	ADEQUATE	ADEQUATE	WEAK	WEAK	STRONG	STRONG	WEAK
6. Level of Gender Funding	ADEQUATE	ADEQUATE	ADEQUATE	STRONG	STRONG	WEAK	WEAK	WEAK	WEAK	STRONG	STRONG	STRONG
7. Quality of Monitoring & Evaluation Mechanisms	ADEQUATE	ADEQUATE	STRONG	ADEQUATE	STRONG	WEAK	ADEQUATE	WEAK	ADEQUATE	STRONG	STRONG	ADEQUATE
8. Sexual and Gender Minorities	ADEQUATE	WEAK	WEAK	WEAK	WEAK	WEAK	ADEQUATE	WEAK	WEAK	ADEQUATE	WEAK	WEAK
9. SGBV	STRONG	WEAK	STRONG	WEAK	WEAK	WEAK	WEAK	WEAK	ADEQUATE	STRONG	STRONG	STRONG
10. Unpaid Care Work	STRONG	STRONG	ADEQUATE	ADEQUATE	WEAK	WEAK	WEAK	STRONG	STRONG	STRONG	STRONG	ADEQUATE
Scores (10):	5 S 4 A 1 W	3 S 4 A 3 W	6 S 2 A 2 W	3 S 5 A 2 W	4 S 3 A 3 W	0 S 3 A 7 W	1 S 6 A 3 W	4 S 1 A 5 W	2 S 4 A 4 W	9 S 1 A 0 W	9 S 0 A 1 W	3 S 4 A 3 W
Combined Scores: (20)	N/A	9 S 6 A 5 W		N/A	N/A	1 S 9 A 10 W		6 S 5 A 9 W		18 S 1 A 1 W		N/A
Strong, by percentage:	50%	45%		30%	40%	5%		30%		90%		30%
Adequate, by percentage:	40%	30%		50%	30%	45%		25%		5%		40%
Weak, by percentage:	10%	25%		20%	30%	50%		45%		5%		30%

Rankings

The IFI rankings below are based on the percentages of Strong, Adequate and Weak scores that their gender policies received, as summarized at the bottom of Table 2 (and elaborated in Annex 3):

1. IDB (90% Strong, 5% Adequate, 5% Weak)
2. ADB (50% Strong, 40% Adequate, 10% Weak)
3. AfDB (45% Strong, 30% Adequate, 25% Weak)
4. CDB (40% Strong, 30% Adequate, 30% Weak)
5. BOAD (30% Strong, 50% Adequate, 20% Weak)
6. World Bank (30% Strong, 40% Adequate, 30% Weak)
7. EIB (30% Strong, 25% Adequate, 45% Weak)
8. EBRD (5% Strong, 45% Adequate, 50% Weak)

The IDB retains its long-term status of having the strongest IFI gender policies (Bibler and Zuckerman, 2013). While both BOAD and EIB received 30% Strong scores, the BOAD was ranked higher than EIB since it received 50% Adequate scores (and 20% Weak), while EIB only received 25% Adequate scores (and 45% Weak).

The aggregate Gender Policy scores presented above are further dissected in Table 2-A and presented pictorially in Graphs 1 and 2. Table 2-A presents the scores received per each indicator across the eight IFIs. This is relevant in depicting the distribution of the scoring and provides a sense of where the IFIs succeeded in their approaches to gender-sensitivity. The bottom two lines tally the combined strength of individual indicators across IFIs numerically and in percentage terms.

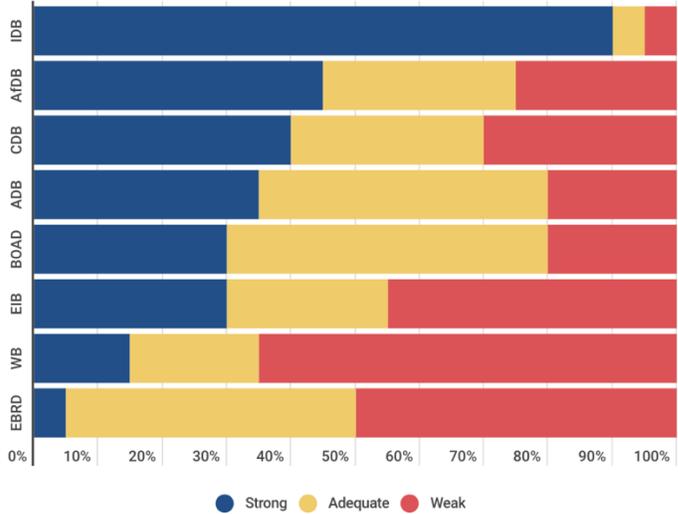
Table 2-A: Gender Policy Indicator Scorecard Across IFIs

Gender Policy Indicator	Strong	Adequate	Weak
Goals	5	6	1
Priorities	9	2	1
Mandate	4	5	3
Mechanisms to Engender	7	4	1
Staffing	4	4	4
Level of Funding	5	3	4
Monitoring & Evaluation	4	6	2
Sexual and Gender Minorities	0	3	9
Sexual & Gender-Based Violence	5	1	6

Unpaid Care Work	6	3	3
Total (120):	49	37	34
Percentage of Total:	40.83%	30.83%	28.33%

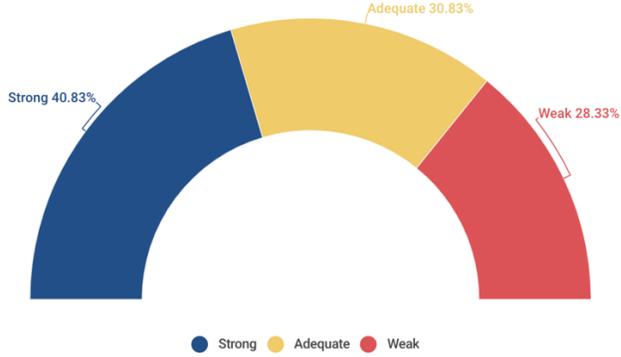
Graph 1 displays the score distribution and overall gender-sensitivity of each IFI's gender policy. The IFIs arrangement on the graph reflect their rankings, with the highest ranking IFI at the top and lowest ranking IFI at the bottom. Only one IFI (IDB) received a majority Strong scores, while the rest received less than 50% Strong scores. The score distribution generally reflects the overall performance presented in Table 2-A above. A number of IFIs received roughly equal Adequate and Weak scores.

Graph 1: Aggregate IFI Gender Policy Indicator Scores



Graph 2 below combines the indicator scores from Table 2, presented in Table 2-A, to display the aggregate IFI gender policy scores by degree of strength. Overall, 40.83% of the IFIs' gender policies scored Strong, 30.83% scored Adequate, and 28.33% scored Weak. It is visible that while the most prevalent score is Strong, the policies were not overwhelmingly strong. The gender policies are overall stronger than the ESFs, which will be analyzed in section 4, a finding that is discussed further in section 5 (Conclusions and Recommendations).

Graph 2: IFI Gender Policy Aggregate Scores on Gender-sensitivity



3.2 Individual Gender Policy Indicator Analyses & Scores

Having presented aggregate IFI Gender Policy scores, next we delve into analyzing each policy's gender performance indicator by indicator.

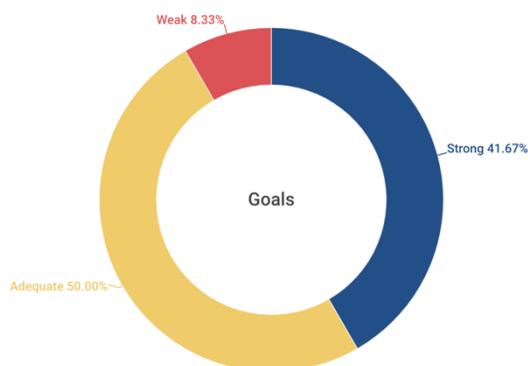
Indicator 1: Goals

Definition: The *Goals* indicator measures the extent to which IFI gender policies promote gender equal rights (GERs) within broader human, social, and economic rights (see rights list in Annex 2). Strong policies require that IFI projects promote GERs complementarily with gender-equal economic empowerment. Several IFI gender policies and many IFI projects solely or mainly promote women's economic empowerment with no or little attention to GERs.

Relevance: Goals shape IFIs commitment to gender equality and gender equal rights across operations⁴. They usually reflect IFI gender mainstreaming approaches⁵.

Scoring: Graph 3 displays combined IFI gender policy scores in percentage terms for the *Goals* indicator, demonstrating a nearly equal distribution between Strong and Adequate scores. Five policies scored strongly (ADB 2019, AfDB 2014-2018, EIB 2016, IDB 2010, IDB 2017); six adequately (AfDB 2001, BOAD 2012, CDB 2008, EBRD 2015, EIB 2018, World Bank 2015); one weakly (EBRD 2009) (see Table 2, 2-A and Annex 3).

Graph 3: Gender Policy – Goals



Recommendations:

All gender policies should:

- Require that goals apply a gender equal rights (GERs) framework to all project contents and risk assessments (see *ESFs – Gender in Environmental & Social Risk Assessments*) in addition to promoting gender-equal economic empowerment.
- Recognize GERs explicitly within human, social, and economic rights. These GERs should extend to all marginalized identities, including sexual and gender minorities (SGMs), indigenous people, individuals with disabilities, and more.

⁴ IFIs use 'operations' as an umbrella term covering project and non-project investments. The latter include FI and development policy loans (formerly called structural adjustment loans).

⁵ While several IFIs continue to use the term 'mainstreaming', this has become a controversial strategy. See Zuckerman 2018 for an elaboration on this critique.

- Address cross-cutting goals that extend beyond ‘traditional gender issues’ such as health and education. A broad range of gender-related issues can include but is not limited to climate change, resource management, land rights, wealth creation opportunities, and access to decision-making processes in project worksites, offices and within homes.

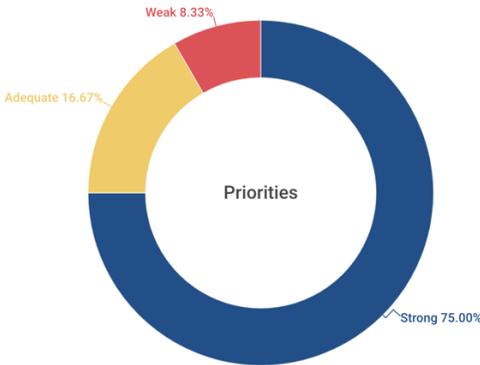
Indicator 2: Priorities

Definition: The *Priorities* indicator scores the extent to which IFI gender policies prioritize in-depth and transformational gender, climate change, class, caste, race, age and other intersectional impacts.

Relevance: Priorities reflect IFI commitments to gender sensitivity in their missions and goals, and throughout operations and institutionally.

Scoring: Graph 4 displays the combined IFI gender policy scores in percentage terms for the *Priorities* indicator. Nine policies scored strongly (ADB 2019, AfDB 2001, AfDB 2014-2018, BOAD 2012, EIB 2016, EIB 2010, IDB 2010, IDB 2017, World Bank 2015); two adequately (CDB 2008, EBRD 2015); one weakly (EBRD 2009) (see Table 2, 2-A and Annex 3). This is the highest-scoring indicator in the gender policy analysis.

Graph 4: Gender Policy – Priorities



Recommendations:

All gender policies should:

- Prioritize key gender issues, such as women’s economic empowerment, social protections, and SGBV.
- Cross-cut gender issues with global priorities such as climate change, resource access, infrastructure, food security, and rural development.
- Promote gender equality and GERs across all investment sectors and project types.

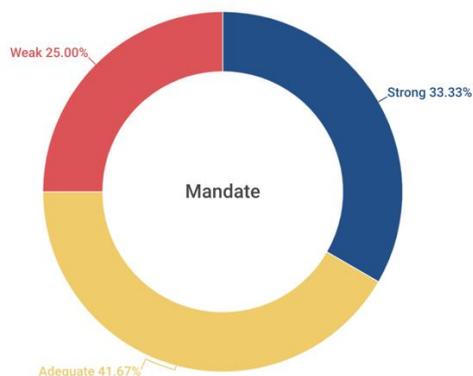
Indicator 3: Mandate

Definition: The *Mandate* indicator scores the extent to which gender policies promote mandatory or voluntary approaches to achieving gender equality. Policies are scored on the extent to which they incorporate some form of a mandatory gender safeguard to prevent harm, as well as promote benefits, for women and SGMs.

Relevance: A gender policy mandate critically influences how positively or negatively impactful the policy may be. Policies that are not mandated may be received as suggestions and not be rigorously implemented by IFI staff.

Scoring: Graph 5 displays the combined IFI gender policy scores in percentage terms for the indicator *Gender Mandate*. Four policies scored strongly (EBRD 2015; EIB 2016, IDB 2010, IDB 2017); five adequately (AfDB 2001, AfDB 2014-2018, BOAD 2012, CDB 2008, EBRD 2009); three weakly (ADB 2019, AfDB 2014-2018, World Bank 2015) (see Table 2, 2-A and Annex 3).

Graph 5: Gender Policy – Mandate



Recommendations:

All gender policies should:

- Include a mandatory, freestanding gender safeguard. The safeguard should aim to prevent harm to women, men, and sexual and gender minorities. If gender-based harm occurs, the gender safeguard must be subject to project grievance and IFI accountability mechanisms, complaints, and redress processes.
- Include mandatory do-good measures to ensure all genders benefit from operations as well as mandatory do-no-harm safeguards.

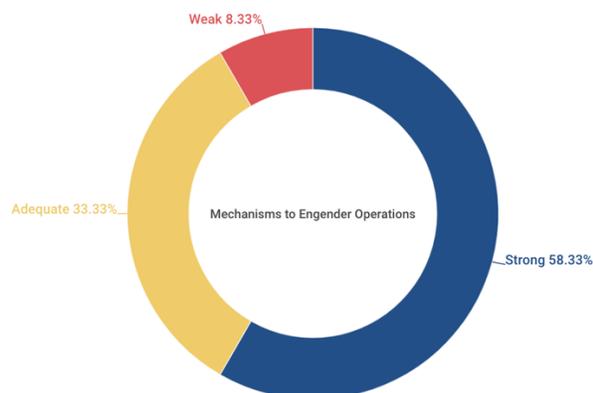
Indicator 4: Mechanisms to Engender Operations

Definition: The *Mechanisms to Engender Operations* indicator scores the tools that gender policies prescribe to effectively carry out goals, priorities and mandates, especially to integrate gender considerations consistently in operations, country and sector strategies, and other key IFI activities. For example, the ADB’s Gender Tip Sheets have been used extensively by project staff across sectors (ADB 2013).

Relevance: Mechanisms that engender operations suggest practical tools for operations staff to implement project goals, priorities, and mandates.

Scoring: Graph 6 displays the combined IFI gender policy scores for the indicator *Mechanisms to Engender Operations*. Seven policies scored strongly (ADB 2019, AfDB 2001, AfDB 2014-2018, BOAD 2012, CDB 2008, IDB 2010, IDB 2017); four adequately (EBRD 2009, EBRD 2015, EIB 2016, World Bank 2015); one weakly (EIB 2018). (see Table 2, 2-A and Annex 3).

Graph 6: Gender Policy – Mechanisms to Engender Operations



Recommendations:

All gender policies should:

- Ensure projects include mechanisms to fully identify and address gender issues in all project cycle stages and all IFI activities. Doing so demonstrates a clear commitment to integrating gender equality across operations.
- Require that operations provide specific tools or protocols to incorporate gender equality consistently into all results tracking.

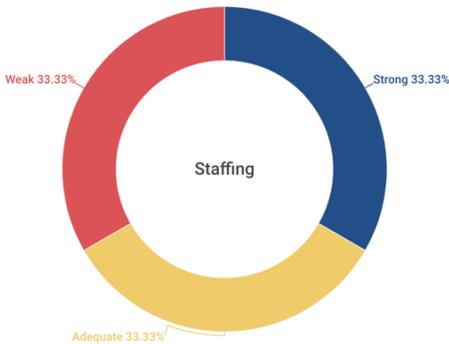
Indicator 5: Staffing

Definition: The *Staffing* indicator analyzes whether gender policies include mandatory robust staff gender training and career incentives, such as evaluating staff attention to gender issues in performance reviews. Strong policies include effective staff training on intersectionally addressing gender issues in operations and other IFI activities. This intersectionality includes climate change and social disparities such as class, caste, race, age, and marginalized gender identity issues.

Relevance: Strong IFI staff practices promoting gender equality can engender operations to reach ultimate development goals such as reducing poverty and harmful climate impacts.

Graph 7 displays the combined IFI gender policy scores for the *Staffing* indicator. Four policies scored strongly (AfDB 2014-2018, CDB 2008, IDB 2010, IDB 2017); four adequately (ADB 2019, BOAD 2012, EBRD 2009, EBRD 2015); four weakly (AfDB 2001, EIB 2016, EIB 2018, World Bank 2015) (see Table 2, 2-A and Annex 3).

Graph 7: Gender Policy – Staffing



Recommendations:

All gender policies should:

- Require that staff orientation and subsequent training focuses on how to integrate gender equal rights institutionally and in all operations and other IFI activities.
- Include staff incentives that reward staff for promoting gender equal rights intersectionally throughout operations and other IFI activities.

Indicator 6: Level of Gender Funding

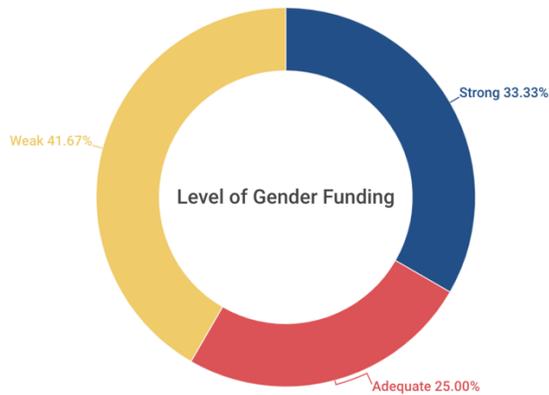
Definition: The *Gender Funding*⁶ indicator analyzes how much gender policies promise adequate, reliable resources for gender work. Strong gender policies allocate ample sustainable core funding rather than depend on short-term trust funds which are often restricted by donors for specific activities. Strong policies also reference additional funding and integrate gender funding intersectionally with other issues such as climate change, the environment, and infrastructure.

Relevance: Funding reflects commitments to meeting policy goals and priorities and integrating strong mechanisms to achieve gender equality.

Scoring: Graph 8 displays the combined IFI gender policy scores for the indicator *Level of Gender Funding*. Four policies scored strongly (BOAD 2012, CDB 2008, IDB 2017, World Bank 2015); three adequately (ADB 2019, AfDB 2001, AfDB 2014-2018); five weakly (EBRD 2009, EBRD 2015, EIB 2016, EIB 2018, IDB 2010) (see Table 2, 2-A and Annex 3).

Graph 8: Gender Policy – Funding

⁶ This analysis only evaluates funding discussed in gender policies, but Gender Action recognizes the possibility that IFIs may fund gender equality priorities through other mechanisms.



Recommendations:

All gender policies should:

- Allocate sustainable core funding to ensure gender equality institutionally and in all phases of all operations. Gender funding should not be reliant on temporary non-core donor funding.
- Specify gender-related funding sources.
- Ensure adequate and secure funding for IFI gender units and institution-wide gender specialist staff.

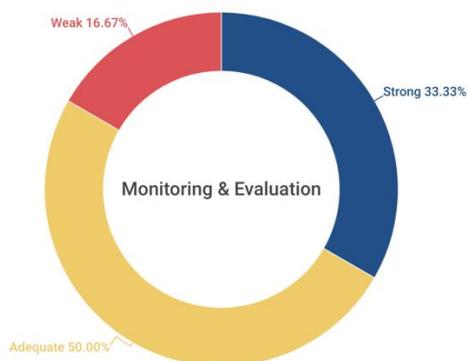
Indicator 7: Quality of Monitoring and Evaluation

Definition: The *Quality of Monitoring & Evaluation* indicator analyzes how much gender policies require projects to collect high-quality baseline and subsequent M&E gender-disaggregated data, including through interviewing project-affected women, men and SGMs. Strong policies require robust gender-based M&E for all key project components throughout the project cycle, and transparent publication and submission of M&E gender data and M&E reports to IFI managers, Boards, and the public.

Relevance: Without collecting high-quality gender-disaggregated baseline and subsequent M&E data, IFIs cannot measure progress made toward achieving gender equality goals.

Scoring: Graph 9 displays the combined IFI gender policy scores for the indicator *Monitoring & Evaluation*. Four policies scored strongly (AfDB 2014-2018, CDB 2008, IDB 2010, IDB 2017); six adequately (ADB 2019, AfDB 2001, BOAD 2012, EBRD 2015, EIB 2015, World Bank 2015); two weakly (EBRD 2009, EIB 2016) (see Table 2, 2-A and Annex 3).

Graph 9: Gender Policy – Monitoring & Evaluation



Recommendations:

All gender policies should:

- Require project collection of high-quality gender-disaggregated baseline and subsequent project data based on robust gender indicators and monitoring frameworks.
- Require rigorous gender data evaluation in project supervision reports and gender policy implementation reviews, which recommend lessons to improve projects based on gender performance findings.
- Disseminate M&E gender data and reports to IFI managers, Boards, and the public.

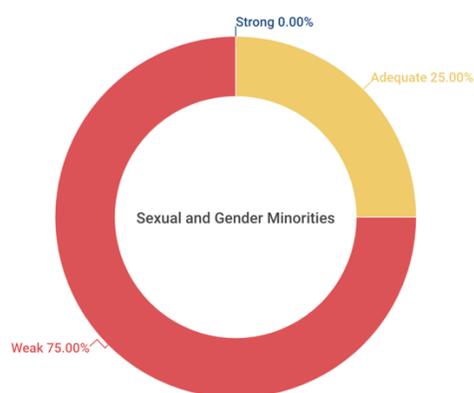
Indicator 8: Sexual and Gender Minorities

Definition: The *Sexual and Gender Minorities* indicator analyzes whether gender policies ensure non-discrimination of LGBTQ+ people as well as their inclusion as beneficiaries. Strong policies outline and provide safeguarding protections from potential project harm for all LGBTQ+ people. Additionally, LGBTQ+ people should benefit from program areas that may have traditionally only targeted women and girls. Within this analysis, various terms are used to refer to the LGBTQ+ population, including sexual and gender minorities (SGMs), and Sexual Orientation and Gender Identity (SOGI) groups.

Relevance: Unfortunately, SGMs are widely left out of gender-focused programs and initiatives. Burdens of global persecution, exclusionary and punishing legislation, and public stigma have long constrained the safety and ability of LGBTQ+ people to access and benefit from potential resources. Conscious IFI efforts to include SGMs in all gender equality efforts will contribute to dismantling these gender disparities.

Scoring: Graph 10 displays the combined IFI gender policy scores for the indicator *Sexual and Gender Minorities*. No policies scored strongly; three adequately (ADB 2019, EBRD 2015, IDB 2010); nine weakly (AfDB 2001, AfDB 2014-2018, BOAD 2012, CDB 2008, EBRD 2009, EIB 2016, EIB 2018, IDB 2017, World Bank 2015) (see Table 2, 2-A and Annex 3).

Graph 10: Gender Policy – Sexual and Gender Minorities



Recommendations:

All gender policies should:

- Define and recognize sexual and gender minorities (SGMs) as potentially vulnerable project-affected groups. Gender policies' focus should be inclusive of globally recognized definitions for SGM groups including lesbian, gay, bisexual, transgender, and intersex, among others.

- Grant SGMs explicit do-no-harm protection alongside women and girls.
- Target SGMs explicitly along with other genders for project benefits and programs that aim to dismantle gender barriers and disparities.
- Address possible harassment, discrimination, abuse, exploitation, and sexual and gender-based violence affecting SGMs in projects, as well as in institutional guidance and grievance and redress mechanisms.

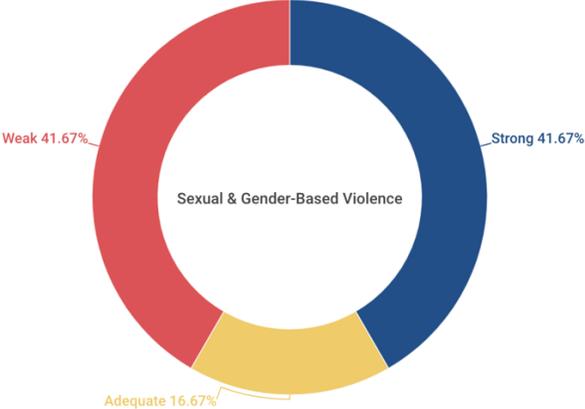
Indicator 9: Sexual and Gender-Based Violence

Definition: The *SGBV* indicator scores how well gender policies require measures to, at a minimum, avoid and prevent SGBV. Strong policies include a clear and extensive definition of the many forms of SGBV and commit to responding to SGBV, including assistance to those who report SGBV, whether they are project-affected individuals, IFI or project staff, or third-party contractors. Strong policies furthermore require that SGBV be considered as a risk during project identification, design and implementation.

Relevance: Explicit attention to SGBV is needed to prevent or mitigate it, and to ensure that survivors of such violence are supported through providing access to healing processes and reparations.

Scoring: Graph 11 displays the combined IFI gender policy scores for the indicator *Sexual and Gender-Based Violence (SGBV)*. Five policies scored strongly (ADB 2019, AfDB 2014-2018, IDB 2010, IDB 2017, World Bank 2015); two adequately (BOAD 2012, EIB 2018); five weakly (AfDB 2001, CDB 2008, EBRD 2009, EBRD 2015, EIB 2016) (see Table 2, 2-A and Annex 3).

Graph 11: Gender Policy – Sexual & Gender-Based Violence



Case 1: SGBV – the IDB in Haiti

Recommendations:

All gender policies should:

- Recognize SGBV as a serious risk to project-affected individuals, IFI and project staff, and third-party contractors.
- Include a clear and extensive definition of the many forms of SGBV, including but not limited to sexual harassment, any form of sexual coercion, sexual assault, sex trafficking, sexual exploitation, sexual abuse, and violence against women and SGMs on the basis of gender identity or sexual orientation.
- Require SGBV risk awareness and mitigation measures in project identification, design, consultations, implementation, all other project activities and within IFIs institutionally.
- Prevent working conditions that may result in SGBV. This requires project protocols that provide guidance on logistical methods to prevent and deter SGBV, such as adequate lighting outdoors at night, sex-separate secure sleeping quarters, and well-lit sex-separate sanitation facilities.
- Address the risks of SGBV by staff and contracted outside workers in project-affected communities through training on SGBV and harassment prevention.

The Caracol Industrial Park (PIC) project in Haiti funded by the Inter-American Development Bank (IDB) flouted critical aspects of the IDB's 2010 Operational Policy on Gender Equality, particularly commitments to addressing and offsetting SGBV.

In accordance with the Policy's priority to invest in preventing SGBV, PIC project documents advised a non-discrimination policy with zero tolerance for sexual harassment, as well as a gender-sensitive complaints policy. They promoted the installation of adequate lighting in public areas (a known SGBV risk deterrent). However, a case study of the project by Gender Action as well as the 2018 IDB accountability mechanism report exposed numerous SGBV-related issues, demonstrating that the policy was breached.

Farmers who were forcibly displaced to acquire land for the project did not receive promised new housing. Consequently, they had to live in insecure informal settlements, which increased the risk of SGBV against women. The project failed to provide gender-separate sanitation facilities and its complaint mechanism was not gender-sensitive. Female employees lacked mechanisms to report sexual harassment and SGBV to predominantly male managers.

Because of the clear disconnect between IDB's 2010 policy and PIC project implementation, the displaced farmers filed a complaint to the IDB accountability mechanism in 2017 (MICI 2018). Five years later, as a result of a rare successful IFI complaint settlement, the farmers were offered alternative land, job training, and factory jobs, with SGBV prevention and services for women survivors.

The information about this case is based on the 2013 report by Gender Action, 'Caracol Industrial Park: Social and Gender Impacts of Year One of Haiti's newest IFI-funded Industrial Park' (Gender Action 2013).

- Ensure the existence of avenues for justice for victims and survivors of all forms of SGBV including through enforcing project grievance and IFI accountability mechanisms. All project staff and affected peoples should be informed of reporting processes, confidentiality rights, grievance filing procedures, expected redress timelines, and rights for discontinuity of the process.⁷

⁷ Discontinuity of process refers to the right of those filing grievances to withdraw claims from proceedings, ideally without repercussions.

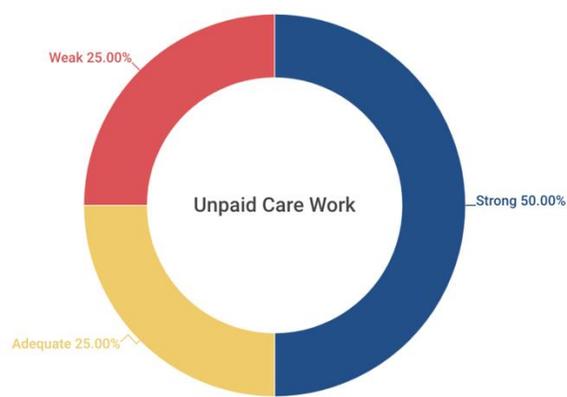
Indicator 10: Unpaid Care Work

Definition: The *Unpaid Care Work* indicator analyzes the extent to which gender policies require that projects implement measures that recognize, value, compensate, and distribute unpaid care work among genders. Unpaid care work includes childcare, elder care, household labor such as fetching water or firewood, and community and other activities that are classified outside of economically compensated work.

Relevance: Unpaid care work, especially household labor, is known to contribute to ‘time poverty’ and often considered to be drudgery. Women across the globe are tied to hours of labor that are both necessary and unrecognized. These unvalued and unpaid activities contribute mightily to economies. When IFI projects attempt to provide economic opportunities to women, they must recognize that participation may depend on simultaneous project provision of childcare, water, and other basic needs.

Scoring: Graph 12 displays the combined IFI gender policy scores for the indicator *Unpaid Care Work*. Of the 12 IFI gender policies, six scored strongly (ADB 2019, AfDB 2001, EIB 2016, EIB 2018, IDB 2010, IDB 2017); three adequately (AfDB 2014-2018, BOAD 2012, World Bank 2015); and three weakly (CDB 2008, EBRD 2009, EBRD 2015) (see Table 2, 2-A and Annex 3).

Graph 12: Gender Policy – Unpaid Care Work



Recommendations:

All gender policies should:

- Facilitate women’s participation in project-related activities, including consultations, jobs, and trainings, by providing childcare and transportation services.
- Invest in technologies to reduce women’s unpaid drudgery such as harvesting and transporting firewood and fetching water from remote locations.
- Provide gender role training to spread unpaid labor among genders until unpaid labor becomes paid.
- Promote remuneration for vital unpaid care work.

4. Environmental and Social Frameworks - Analysis & Scores

IFI ESFs analyzed and scored: ADB (2009), AfDB (2014), AIIB (2016), BOAD (2015), CDB (2014), EBRD (2019), EIB (2018), IDB (2006), IIC (2018), IFC (2012), NDB (2016), World Bank (2018). The full titles of these documents are provided in Table 3 and in the References.

Environmental and Social Safeguards (ESSs) and Frameworks (ESFs) (generically called ESFs in this report) provide specific environmental and social safeguards that intend to prevent and offset harm to project-affected areas, communities, and individuals. ESFs should address issues of harassment, discrimination, violence, resettlement, displacement, and environmental impacts and resource depletion. Similar to gender policies, adherence to and impact of these safeguards are dependent on project-level actions. This report's and other Gender Action and other CSO case studies demonstrate that there remain widespread incidences of harm.

To analyze and score the extent to which the above 12 IFI ESFs provide the mandated protection of gender equal rights and gender equality, Gender Action developed eleven ESF indicators on gender sensitivity (see 2.1 for the list of indicators and Annex 4 for their scoring criteria). As the Methodology section explained, we first summarize aggregate IFI scores based on scoring each of their ESFs against the indicators (4.1), followed by detailed indicator-by-indicator ESF analyses (4.2). These analyses and scores are depicted in tables and graphs, followed by recommendations. Gender Action and other citizen organizations' case studies present examples of IFI-funded project implementation gender impacts that demonstrate the extent of IFI adherence to ESF requirements and relate to our ESF gender indicators. The inclusion of these cases links IFI policies to project actions and impacts, which often result in forms of harm that said policies aim to mitigate. In a number of cases, the relevant policy was supposed to protect project-affected individuals from documented harm.

4.1 Aggregate ESF Indicator Analysis & Scores

Table 3 presents the outcomes of the scoring exercise of the 12 ESF documents against Gender Action's 11 gender sensitivity indicators for ESFs. See Annex 4 for the scoring each indicator's criteria, and Annex 5 for scoring exercise details. The bottom three rows of Table 3 express the scores' strengths in percentage terms. The *primary* score received by each IFI's ESF is color-coded to match the highlighted categories of Strong, Adequate, and Weak.

Table 3: Environmental & Social Framework (ESF) Gender-sensitivity Indicator Scores

IFI:	ADB	AfDB	AIIB	BOAD	CDB	EBRD	EIB	IDB	IDB Invest	IFC	NDB	WB
ESF Documents/ Gender Indicators	<u>Safeguard Policy Statement</u> (2009) ⁱ	<u>Integrated Safeguards System; Policy Statement and Operational Safeguards</u> (2014) ⁱⁱ	<u>Environmental and Social Framework</u> (2016) ⁱⁱⁱ	<u>Environmental and Social Management in the Financing of Projects</u> (2015) ^{iv}	<u>Environmental and Social Review Procedures</u> (2014) ^v	<u>Environmental and Social Policy</u> (2019) ^{vi}	<u>Environmental and Social Standards</u> (2018) ^{vii}	<u>Environment and Safeguards Compliance Policy</u> (2006) ^{viii}	<u>Environmental and Social Sustainability Policy</u> (2013) ^{ix}	<u>Performance Standards</u> (2012) ^x	<u>Environmental and Social Framework</u> (2016) ^{xi}	<u>Environmental and Social Framework</u> (2018) ^{xii}
Gender Mandate/ Safeguard	ADEQUATE	ADEQUATE	ADEQUATE	WEAK	WEAK	ADEQUATE	ADEQUATE	ADEQUATE	WEAK	WEAK	WEAK	WEAK
Gender in Environmental & Social Risk Assessments	WEAK	ADEQUATE	ADEQUATE	ADEQUATE	ADEQUATE	STRONG	WEAK	WEAK	WEAK	WEAK	WEAK	STRONG
Gender Discrimination & Rights	WEAK	ADEQUATE	WEAK	WEAK	ADEQUATE	STRONG	ADEQUATE	WEAK	ADEQUATE	ADEQUATE	WEAK	WEAK
Gender in Environment & Climate	ADEQUATE	WEAK	WEAK	WEAK	WEAK	ADEQUATE	WEAK	WEAK	WEAK	ADEQUATE	WEAK	WEAK
Gender & Information Disclosure	WEAK	WEAK	STRONG	ADEQUATE	WEAK	STRONG	ADEQUATE	WEAK	WEAK	ADEQUATE	WEAK	WEAK
Gendered Consultations & Consent (<i>FPIC a priori</i>)	ADEQUATE	ADEQUATE	ADEQUATE	ADEQUATE	ADEQUATE	ADEQUATE	ADEQUATE	WEAK	ADEQUATE	WEAK	ADEQUATE	ADEQUATE
Gender in Resettlement & Compensation	ADEQUATE	STRONG	ADEQUATE	STRONG	WEAK	STRONG	STRONG	ADEQUATE	WEAK	STRONG	STRONG	ADEQUATE
Gender Monitoring & Evaluation (M&E)	ADEQUATE	ADEQUATE	ADEQUATE	ADEQUATE	ADEQUATE	ADEQUATE	WEAK	WEAK	WEAK	WEAK	WEAK	WEAK
SGBV & Harassment	WEAK	ADEQUATE	WEAK	WEAK	ADEQUATE	STRONG	STRONG	WEAK	WEAK	ADEQUATE	WEAK	WEAK
Sexual & Gender Minority (SGM) Targeting	WEAK	WEAK	WEAK	WEAK	WEAK	ADEQUATE	ADEQUATE	WEAK	WEAK	WEAK	WEAK	WEAK
Gendered Labor	WEAK	WEAK	WEAK	WEAK	ADEQUATE	STRONG	WEAK	WEAK	ADEQUATE	WEAK	WEAK	ADEQUATE
Score:	0 S 5 A 6 W	1 S 6 A 4 W	1 S 5 A 5 W	1 S 4 A 6 W	0 S 6 A 5 W	6 S 5 A 0 W	2 S 5 A 4 W	0 S 2 A 9 W	0 S 3 A 8 W	1 S 4 A 6 W	1 S 1 A 9 W	1 S 3 A 7 W
IFI ESF Strong, by percentage:	0%	9%	9%	9%	0%	54%	18%	0%	0%	9%	9%	9%
IFI ESF Adequate, by percentage:	45%	54%	45%	36%	45%	45%	45%	18%	27%	36%	9%	27%
IFI ESF Weak, by percentage:	54%	36%	45%	54%	54%	0%	36%	81%	72%	54%	81%	63%

Rankings

The ranking of IFIs below is based on the percentages of Strong, Adequate and Weak scores that their ESFs received, as was depicted in Table 3:

1.	EBRD	(54% Strong, 45% Adequate, 0% Weak)
2.	EIB	(18% Strong, 45% Adequate, 36% Weak)
3.	AfDB	(9% Strong, 54% Adequate, 36% Weak)
4.	AIIB	(9% Strong, 45% Adequate, 45% Weak)
5.	BOAD	(9% Strong, 36% Adequate, 54% Weak)
	IFC	(9% Strong, 36% Adequate, 54% Weak)
6.	World Bank	(9% Strong, 27% Adequate, 63% Weak)
7.	NDB	(9% Strong, 9% Adequate, 81% Weak)
8.	CDB	(0% Strong, 55% Adequate, 45% Weak)
9.	ADB	(0% Strong, 45% Adequate, 55% Weak)
10.	IIC	(0% Strong, 27% Adequate, 72% Weak)
11.	IDB	(0% Strong, 18% Adequate, 81% Weak)

The only IFI with majority ESF gender-sensitivity Strong scores, the EBRD, was ranked first, followed by the EIB which had the 2nd highest Strong scores but at a significantly lower level than EBRD.

Table 3-A aggregates the 12 IFIs' scores per indicator. Methodologically, there are a total of 132 points, generated from the 12 IFIs that each received one score per the 11 indicators. Summarizing all IFIs' ESF gender sensitivity scores, Table 3-A demonstrates that of the 132 scores, 69 scores (52.27%) signify Weak, 49 (37.12%) Adequate and 14 (10.61%) Strong gender scores. These scores are pictorially presented in Graphs 13 and 14 further below. Table 3-A also demonstrates that the Gender in Resettlement & Compensation received the most Strong scores (6 out of 14); Gender Consultations & Consent received 0 Strong but 10 out of 14 Adequate scores. Scores on the remaining nine ESF gender indicators were predominantly Weak.

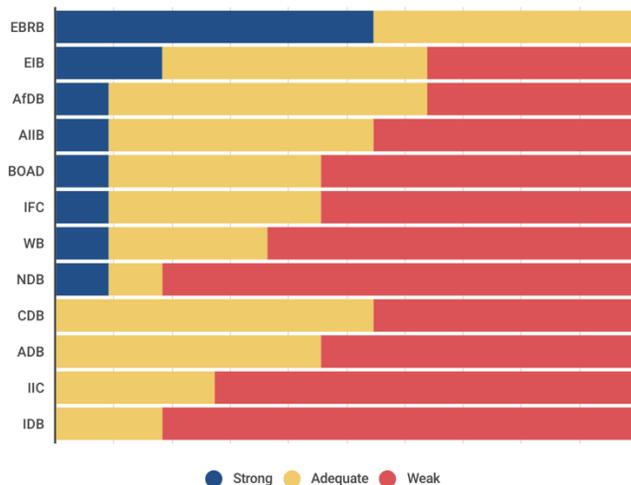
Table 3-A: ESF Gender-sensitivity Indicator Scorecard Across IFIs

ESF Indicator	Strong	Adequate	Weak
Gender Mandate/ Safeguard	0	6	6
Gender in Environmental & Social Risk Assessments	2	4	7
Gender Discrimination & Rights	1	5	6
Gender in Environment & Climate	0	3	9
Gender & Information Disclosure	2	3	7
Gendered Consultations & Consent	0	10	2
Gender in Resettlement & Compensation	6	4	2
Gender Monitoring & Evaluation (M&E)	0	6	6
SGBV & Harassment	2	3	7
Sexual & Gender Minority (SGM) Targeting	0	3	9
Gendered Labor	1	3	8
Total (132):	14	49	69
Final Percentage:	10.61%	37.12%	52.27%

Graph 13 displays the gender-sensitivity score distribution of each IFI, making

it instantly clear that the gender-sensitivity of IFI ESF leaves a lot to be desired. Only one IFI (EBRD) received a majority of Strong scores (which is only a weak majority garnered on 6 out of 11 indicators), while four IFIs did not receive a single Strong score. Furthermore, although one expects newer and forthcoming updated ESFs would achieve higher gender rankings than do current ESFs (dating from 2009-2019), the record to date is mixed. While the 2019 EBRD ESF is relatively gender-sensitive, the 2018 World Bank ESF is relatively gender-insensitive, demonstrating that newness is not necessarily a determination of gender-sensitivity.

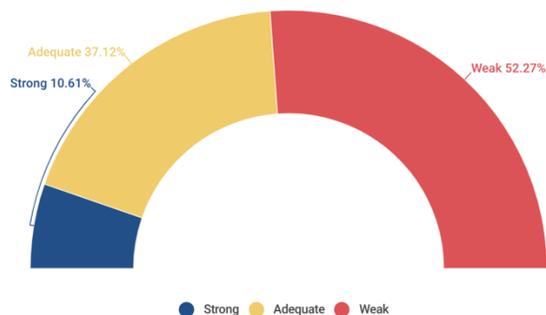
Graph 13: Aggregate IFI ESF Gender-sensitivity Indicator Scores



Graph 14 summarizes the overall gender scores of all 12 IFIs' ESFs, depicting that only 10.61% of the ESFs scored Strong, 37.12% scored Adequate, and 52.27% scored Weak. Comparing Graph 13 to Graph 1

(Gender Policy Aggregate Scores), it is clear that the ESFs are much weaker than the IFIs' Gender Policy scores.

Graph 14: IFI ESF Aggregate Scores on Gender sensitivity



4.2 Individual ESF Indicator Analyses & Scores

Having presented aggregate IFI ESF gender-sensitivity scores, next we delve into analyzing each ESF's gender performance indicator by indicator.

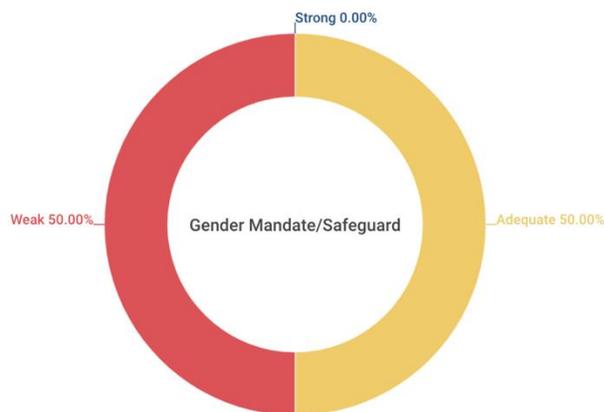
Indicator 1: Gender Mandate/Safeguard

Definition: The *Gender Mandate/Safeguard* indicator scores the extent to which ESFs include specific gender mandates and safeguards.

Relevance: Strong policies mandate a do no harm safeguard to prevent gender discrimination and other forms of harm. Safeguards can also facilitate aggrieved project-affected people taking complaints to project grievance and/or IFI accountability mechanisms.

Scoring: Graph 15 displays the combined ESF scores for the indicator *Gender Mandate/Safeguard*. The graph demonstrates that the scores are evenly Adequate and Weak, with no IFI scoring Strong. Six IFIs scored adequately (ADB, AfDB, AIIB, EBRD, EIB, IDB) and the other six weakly (BOAD, CDB, IIC, IFC, NDB, World Bank) (see Table 3, 3-A and Annex 5).

Graph 15: ESFs - Gender Mandate/Safeguard



Recommendations:

All ESFs should:

- Include a mandatory, stand-alone do no harm gender safeguard. While some ESFs currently incorporate gender issues into general safeguards, none do so strongly. A mandatory freestanding gender safeguard would provide powerful incentive for achieving gender equality.
- Incorporate gender issues systematically and intersectionally, such as within environmental and social risk assessments and environmental resource and climate change protection measures. In current ESFs, mentioning gender roles is common only in ESF introductions and/or within strings of vulnerable groups (usually in parentheses).

Case 2: Gender Mandate / Safeguard – the AIIB in Bangladesh

The Asian Infrastructure Investment Bank (AIIB) financed the Bhola Integrated Power Plant (Bhola IPP), also called Bhola II, which is meant to boost gas and diesel power generation in Bangladesh to promote economic development. In 2018, CLEAN (Coastal Livelihood and Environmental Action Network) conducted a study of the livelihood impacts of this mega project on local communities in Bhola. The report documents numerous detrimental impacts on project-affected people, especially women. Field findings reported mass losses of water, land, livestock, and thus livelihoods. Project construction and pollution runoff impacted sanitation and caused adverse health effects for women and children, ultimately worsening their quality of life (Mehedi et al., 2019).

It is relevant to note that the AIIB does not yet have a gender policy. However, Bhola II breached the AIIB's 2016 ESF gender and environmental safeguard protections, which scored 'Adequate' in our analysis. While the ESF does not score Strong for its gender mandate, it does encourage clients to identify and mitigate harmful gender-specific impacts. Key areas of gender-sensitive protection listed in the ESF include livelihood(s), resource access, and health - all of which were impacted by this project.

Bhola II's construction was enabled by land grabbing, which reduced the land and resources available for women farmers without a follow-up livelihood restoration program. Women lost more than 50% productivity of marketed fruits, vegetables and livestock, and home garden produce. Very little land remained available for cattle grazing, a task primarily handled by women, and their number of cows and goats was reduced to nearly none. Women reported that they have to pay extra money to purchase feed for their cattle.

Beyond the loss of livelihoods, the environment is no longer safe for project-affected communities in the area surrounding Bhola II. The power plant dumps garbage and sand into local canals, polluting the only local source of drinking water. Women now must carry water daily from 2-3 kilometers away, to fulfill their farming and household needs, compounding their existing labor burden (tending to livestock and growing food). Some families who cannot make the trip consume the polluted local water. Combined with the lack of proper sanitation facilities, women find themselves utilizing dirty water sources, which is triggering an increase in adverse health effects.

The information in this box is based on the 2018 report 'Bhola Integrated Power Plant (Bhola IPP) and its Impact on Local Communities: Voices from the Ground' (Mehedi et al., 2019)

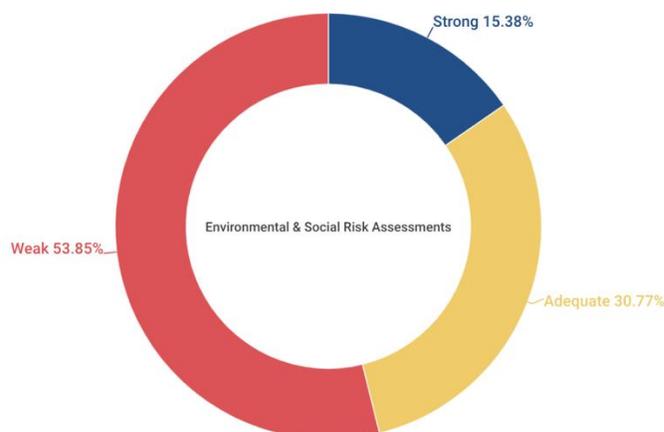
Indicator 2: Gender in Environmental & Social Risk Assessments

Definition: The *Environmental & Social Risk Assessments* indicator analyzes how much the ESF incorporates gender issues into environmental and social risk assessments for individual projects. Strong policies require that gender be included intersectionally in these assessments, to strengthen understanding and address interrelated project gender, environmental and social harms.

Relevance: Risk assessments are critical to avoid and mitigate harm. Integrating gender into environmental and social risk assessments enhances the likelihood of differentially protecting women, men and SGMs from environmental, climate and social harms.

Scoring: Graph 16 displays the combined ESF scores for the indicator *Gender in Environmental & Social Risk Assessments*. Two IFIs scored strongly (EBRD, World Bank); four adequately (AfDB, AIIB, BOAD, CDB); six weakly (ADB, EIB, IDB, IIC, IFC, NDB) (see Table 3, 3-A and Annex 5).

Graph 16: ESFs - Gender in Environmental & Social Risk Assessments



Recommendations:

All ESFs should:

- Require all operations to systematically integrate gender issues into all environmental and social risk assessments.
- Specify that all operations conduct field-based gender assessments including women-only consultations.
- Require in-depth operation follow-up assessments and detailed plans to avoid gender risks.

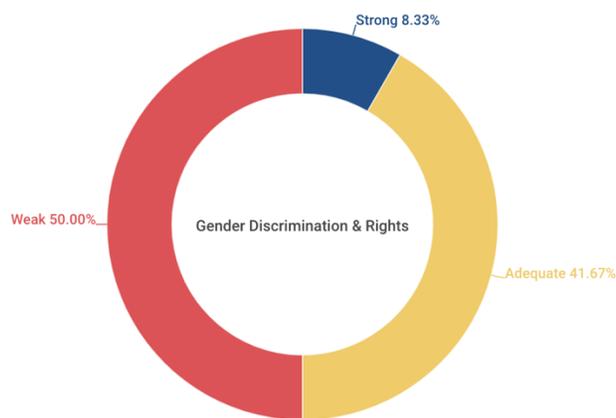
Indicator 3: Gender Discrimination & Rights

Definition: The *Discrimination & Rights* indicator scores how much ESFs require operations to protect against gender discrimination and promote gender equal rights.

Relevance: Specific protection against discrimination is not always guaranteed, especially for women and SGMs.

Scoring: Graph 17 displays the IFI aggregate ESF scores for the indicator *Gender Discrimination & Rights*. One IFI scored strongly (EBRD); five adequately (AfDB, CDB, EIB, IIC, IFC); six weakly (ADB, AIIB, BOAD, IDB, NDB, World Bank) (see Table 3, 3-A and Annex 5).

Graph 17: ESFs - Gender Discrimination & Rights



Recommendations:

All ESFs should:

- Define and require explicit protection against gender discrimination and promote gender equal rights in all operations. This should extend to protection against all forms of harassment, exploitation, and abuse for project staff and project-affected people. This definition should apply to all ESF protective mechanisms, and explicitly include SGMs.
- Require that all project staff attend mandatory training on preventing harassment and discrimination and ensuring gender equal rights. Such training is a prerequisite for staff to implement these protections.

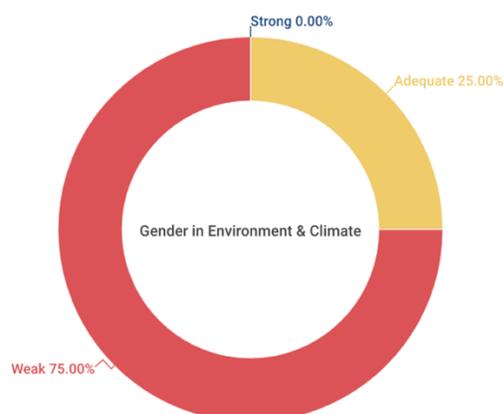
Indicator 4: Gender in Environment & Climate

Definition: The *Environment & Climate* indicator analyzes how well ESFs address gender roles in handling water, land, and biodiversity in project-affected areas. It also considers women’s agency in managing the climate crisis and climate change impacts on women’s livelihoods and health. Strong ESFs recognize and promote women’s key roles in addressing climate and environment-related measures.

Relevance: Women play primary roles in managing natural resources and ecosystems and are often negatively impacted by IFI project disruptions to these resources and ecosystems. It is therefore critical that ESFs require that projects address the nexus of gender roles, the environment and the climate crisis.

Scoring: Graph 18 displays aggregate ESF scores for the indicator *Gender in Environment & Climate*. No IFI scored Strong on this indicator despite women’s predominant role in managing natural resources in IFI borrower countries. A strong majority of IFIs, nine out of 12 (75%) scored Weak (AfDB, AIIB, BOAD, CDB, EIB, IDB, IIC, NDB, World Bank), and only three (25%) scored Adequate (ADB, EBRD, IFC) (see Table 3, 3-A and Annex 5).

Graph 18: ESFs - Gender in Environment & Climate



Recommendations:

All ESFs should:

- Require gender-sensitive environmental and climate change impact assessments providing gender context for preserving natural resources and preventing climate disasters in project-affected areas. Currently, some ESFs conduct gender-sensitive environmental assessments in relation to potential displacement and resettlement processes, but hardly do so for broader environmental and climate issues.
- Require the inclusion of women, who are primary natural resource managers, in project consultations and environmental assessments.

Case 3: Gender in Environment & Climate – the AfDB and BOAD in Senegal

The African Development Bank (AfDB) and West African Development Bank (BOAD) jointly financed the Sendou Power Plant project in Senegal. This project had deleterious effects on people, particularly women, and ecosystems, as was documented in a field-study report by Gender Action, WoMin African Alliance and Lumière Synergie pour le Développement (Randriamaro, 2019). A disregard for community consultations and environmental considerations adversely affected the health of local community members, diminished their livelihoods, and increased women’s care burdens.

Both the AfDB’s 2014 ESF and BOAD’s 2012 ESF fail to require that project social and environmental risk assessments address gender dimensions. Such a requirement would oblige projects to include gender-specific indicators, consultations, and other mechanisms among risk-factors addressed prior to project implementation. Both IFIs blatantly disregarded the environmental and social including gender risks triggered observable harm to women and other community members.

For over a decade, women fishers in Bargny, Senegal, fought against the construction of the Sendou coal power station – to no avail. Fish processing is a main source of livelihood and employment for women. When the plant began operating in 2018, its cooling system soon destroyed most of the local fish processing site. By 2019, more than 1,000 women fishers had already suffered up to a 50% reduction in earnings. Coal particle emissions from the Sendou plant furthermore triggered an increase in respiratory diseases, asthma, chronic allergic conjunctivitis, rhinitis, and tuberculosis in the local population. Caring for the newly sick expanded women’s unpaid care work.

These adverse livelihood and health effects demonstrate how climate and ecological effects impact women who, according to the dominant gender division of labor, carry primary responsibility for putting food on tables and caring for household and community members and ecosystems. Had the project incorporated gender issues

in the environmental risk assessments, it could have prevented harmful intersectional gender, climate, and environmental outcomes.

Thanks to a community complaint that was taken to the AfDB accountability mechanism in 2016, the Sendou coal plant ceased operations in July 2019. The plant may be converted to gas, preferred by the community for causing less pollution than coal. The complaint also had triggered technical improvements to the plant to reduce thermal pollution in the area's seawater and increased resolution of disputes over land rights. Although the situation for the fisherwomen is not yet fully resolved, they are accessing the fish processing grounds (Both Ends, 2020).

The information in this box is based on the 2019 report by Gender Action, WoMin African Alliance and Lumière Synergie pour le Développement, 'Women Stand their Ground against BIG Coal: the AfDB Sendou plant impacts on women in a time of climate crisis' (Randriamaro, 2019).

Indicator 5: Gender & Information Disclosure

Definition: The *Information Disclosure* indicator analyzes the extent to which IFIs and borrowers disclose full available project information to all project-affected people including women, men and SGMs during scoping prior to project design. Often this requires employing effective mechanisms to reach the illiterate and unconnected, who are more often women than men.

Relevance: Disclosing full information during scoping prior to project design is critical to permit project-affected women, men and SGMs to consent or refuse projects which negatively affect their lives, and to access accountability mechanisms should harm occur. IFIs must ensure provision of full information not only for conventional projects but also for opaque Financial Intermediary subprojects which CSO case studies and IFI accountability mechanisms demonstrate have destroyed communities and the environment because FIs have lacked environmental and social expertise and requirements (Geary, 2015; Recourse, SOMO, & IDI, 2018).

Scoring: Graph 19 displays the combined ESF scores for the indicator *Gender & Information Disclosure*. Two IFIs scored strongly (AIIB, EBRD); three adequately (BOAD, EIB, IFC); seven weakly (ADB, AfDB, CDB, IDB, IIC, NDB, World Bank) (see Table 3, 3-A and Annex 5).

Graph 19: ESFs - Gender & Information Disclosure



Recommendations:
All ESFs should:

- Require that all known project information be disclosed prior to project design in a manner that is accessible to all project-affected women, men and SGMs. This includes overcoming illiteracy, lack of access to media, cultural and other barriers.
- Double efforts to research and release full project information for Financial Intermediary-financed projects to all project-affected women, men and SGMs.

Case 4: Gender & Information Disclosure – the AIIB in Bangladesh

Case 2 discussed the livelihood impacts of the AIIB-funded Bhola Integrated Power Plant (Bhola IPP) in Bangladesh. This same mega-project violated the AIIB's ESF by failing to disclose information relevant to project-affected communities in an accessible and gender-inclusive manner. Additionally, the project failed to convey relevant environmental and social risks to the community. Due to little notification, project-affected individuals were unaware of consultations led by the project team. These were the findings of a study by BIC Europe (now Recourse), CLEAN and NGO Forum on ADB (BIC Europe et al., 2019).

Our report scored the AIIB's 2016 ESF 'Strong' on the Gender Information & Disclosure Indicator because it requires that clients ensure relevant information about environmental and social risks is made available to project-affected people. This includes a requirement that projects provide forums for meaningful public consultations, which should be gender-inclusive, accessible, responsive, and tailored to the needs of vulnerable groups. However, the Bhola IPP project failed to adhere to these ESF requirements.

Bhola project documents, which promise to apply the AIIB ESF, claim that multiple community consultations took place. However, a field research team found that only a few people had heard of the consultations or attended them, and those who participated did not feel they could openly share their concerns due to fear arising from local power dynamics. There were no reported efforts to make these sessions gender-sensitive, which would include providing childcare, female facilitators, and women-only spaces.

Accessing project information online was also reportedly very difficult. Many local people are illiterate or lack Internet access, while those who searched online found project documentation with so many Bengali language errors that it was nearly unreadable. Some information was so unclear that some local groups believed that the project was the second phase of an existing power plant, rather than a new project altogether. Project staff have admitted that the Bengali documents need to be re-translated.

That project information was inaccessible to affected people as a whole signifies that few efforts were made to include women who are categorically less literate and less likely to have Internet access than their male peers. Lacking access to project information and/or consultations, people misunderstood the project and were unable to share their concerns.

The information in this box is based on the 2019 report 'Dangerous Distractions Why the Asian Infrastructure Investment Bank must help turn the tide on fossil fuels in Bangladesh' (BIC Europe et al., 2019).

Indicator 6: Gender in Consultations & Consent (FPIC a priori)

Definition: The *Consultations & Consent* indicator analyzes how much ESFs require consultations prior to project design after full information disclosure as the basis for Free Prior and Informed Consent (FPIC) or refusal from all project-affected women, men and SGMs.

Relevance: FPIC traditionally requires consent from indigenous communities prior to project actions that affect their land and resource rights. Gender Action, however, believes IFIs must gender-sensitively apply informed consent (FPIC) to all project-affected people who should have a say in whether and how projects move forward, after receiving all available information about the project and being given the opportunity to participate in accessible consultations. Opaque Financial Intermediaries deny affected

women, men and SGMs the opportunity to knowledgeably consent to or deny projects impacting their lives.

Scoring: Graph 20 displays the combined IFI ESF scores for the indicator *Gender Consultations & Consent*. No IFI scored strongly; nine adequately (ADB, AfDB, BOAD, CDB, EBRD, EIB, IIC, NDB, World Bank); two weakly (IDB, IFC) (see Table 3, 3-A and Annex 5).

Graph 20: ESFs - Gender Consultations & Consent



Recommendations:

All ESFs should:

- Require gender-sensitive and women-only consultations prior to project design and in subsequent project stages with project-affected women, men and SGMs who have received all known project information.
- Require informed consent or refusal to proceed with all projects from all project-affected individuals, regardless of gender, as current ESF consent requirements are limited to indigenous people and/or resettlement processes.
- Require projects to outline mechanisms that ensure consultations are gender-inclusive and gender-sensitive. Approaches should include sex- or gender-specific consultations, as well as consultations at times convenient to women’s schedules such as during school hours so that mothers can attend. Project staff can identify women’s time obligations and availability prior to consultations.
- Ensure projects provide and advertise free, on-site childcare during consultation sessions.
- Require that project staff maintain a detailed log of gender-disaggregated participation data and gender-specific concerns of project-affected people.

Case 5: Gender Consultations & Consent – the IFC and AIIB in Myanmar

The International Finance Corporation (IFC) and Asian Infrastructure Investment Bank (AIIB) in 2016 co-financed Myingyan Gas Power Plant project in Myanmar. The project failed to live up to project claims that there would be gender-focused consultations with project-affected communities.

This report scores IFC’s 2012 ESF ‘Weak’ on the Consultations & Consent Indicator because it fails to require informed consent prior to project design and suggests, but does not require, gender-sensitive consultations during resettlement processes but not otherwise. Meanwhile, discord exists between project documents, which claim gender-sensitive consultations took place, and field study findings, which claim otherwise.

Project documents state that project staff held consultations with ‘stakeholders’ as well as daily discussions with village leaders and community members. The project’s ESF-required Environmental and Social Impact Assessment (ESIA) states that consultations targeted women as well as other vulnerable and marginalized members of local communities. However, there is no documentation available to show that this was the case (BIC Europe, now Recourse, 2018).

Community members presented a number of demands to the CSO field study team, which project staff should have discussed and addressed with affected people prior to project implementation. This included a number of land and environmental resource issues that would require informed consent, such as project construction intruding onto local farming areas. Additional concerns voiced by community members included lack of gender-sensitive access to consultations, and the fact that project information was not disclosed in the local language nor were community members informed of their right to access the IFC accountability mechanism. These failings mean that the concerns of project-affected women were ignored and that the harmful gendered impacts are unlikely to be remedied.

Similar issues were reported about the expansion by Shwe Taung Cement (STC) company of the cement plant and associated coal mine in Myanmar. Significant project funding comes directly from the IFC, the World Bank’s private sector arm, and indirectly from the AIIB (which invests in the IFC Emerging Asia Fund, another STC investor). The project has failed to incorporate gender-inclusive consultations and consent processes, sidelining community needs and concerns (BIC Europe, now Recourse, 2018).

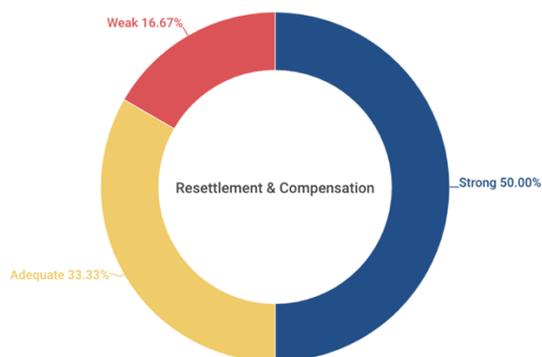
Indicator 7: Gender in Resettlement & Compensation

Definition: The *Resettlement & Compensation* indicator assesses how much ESFs include gender-sensitive resettlement and compensation measures for project-affected women, men and SGMs following their consent to resettlement and compensation terms. Strong protective measures provide generous compensation to displaced and resettled individuals who agree to it, ensuring new housing, land and other amenities that are equal to or better than conditions pre-resettlement.

Relevance: Resettlement causes inevitable cultural, social, and economic disruptions, especially to women’s lives. Incorporating gendered participation in decisions about the resettlement and compensation process ensures that women and SGMs are not overlooked in design, planning and implementation stages.

Scoring: Graph 21 displays the combined ESF scores for the indicator *Resettlement & Compensation*. Six IFIs scored strongly (AfDB, BOAD, EBRD, EIB, IFC, NDB); four adequately (ADB, AIIB, IDB, World Bank); two weakly (CDB, IIC). This is the indicator that receives the highest number of strong scores of all ESF gender-sensitivity indicators. (See Table 3, 3-A and Annex 5).

Graph 21: ESFs - Gender in Resettlement & Compensation



Recommendations:

All ESFs should:

- Require that all displacement, resettlement, and compensation processes address gender issues including intra-household roles, for example by considering all individuals rather than just one 'head of household,' which is often a man, to ensure female- and girl-child households are not overlooked.
- Ensure compensation benefits are dispersed gender-equally.
- Require that projects treat women, men and SGMs equally in resettlement hearings, with communities and tribal councils, where local gender roles inhibit participation of women and SGMs.
- Require projects to convene gender-separate discussions.
- Require that projects recognize women's land rights based on usage, especially in areas where women may not own property. Gender-inclusive pre-resettlement consultations should identify women's land rights and usage in both indigenous and non-indigenous areas, including collective land use, and provide gender-equal compensation.

Case 6: Gender in Resettlement & Compensation – the World Bank in Nigeria

The World Bank's 2006 Lagos Metropolitan Development and Governance Project promised to upgrade nine slums in Lagos, Nigeria. Ongoing construction, however, has forcibly displaced and destroyed communities and harmfully impacted women and girls (Zuckerman & Abah, 2016). While the project was approved prior to the World Bank's ESF discussed in this report, the forcibly displaced residents remain homeless today.

Despite the World Bank's Involuntary Resettlement policy commitment to consult with all displaced individuals and compensate them appropriately, Badia East slum was bulldozed in 2013 without warning. Slum residents were evicted and left homeless, triggering tragic gender and other socioeconomic impacts.

One of the evictees, Bimbo Oshobe, described at World Bank headquarters how the forced eviction separated her from her spouse and children for years. Her children were sent to live in other communities after falling sick from sleeping outside. They dropped out of school because of loss of income to pay school fees. Oshobo's soft drink business had also been bulldozed, obliterating her source of livelihood.

East Badia's displaced people were pressured by the government – the borrower of the World Bank funds - into signing 'compensation' forms without lighting or proper review time and in a room too dark room to read the fine print. Later they learned the signed forms prohibited them from seeking additional compensation. Households received a minuscule lump sum that could hardly cover a month or two of rent elsewhere. Some evictees suffered from malnutrition, and some evicted women and girls, as young as eight years, were raped. Out of desperation, others turned to sex work to survive. These impacts violate numerous aspects of the World Bank's former safeguards policy and current ESF, which specifically promise compensation that could have benefited Badia East community members such as skills training, access to credit, and support for job

opportunities.

A 2019 Guardian article described how six years after the forced evictions, Badia East's residents were still awaiting the promised resettlement (Salau, 2019).

The World Bank's 2018 ESF scored 'Adequate' on the Resettlement and Compensation Indicator. The ESF requires projects to provide compensation benefits for displaced women, including skills training, access to credit, and job opportunities. It suggests that women's preferences for alternative compensation mechanisms, such as land replacement or alternative access to natural resources, should be explored.

Information for this case is based on the article 'When the World Bank Bulldozed Her Community, She Fought Back' (Zuckerman & Abah, 2016).

Case 7: Gender in Resettlement & Compensation – the World Bank and AIIB in Pakistan

The 2016 Tarbela 5 Hydropower Extension project in Pakistan is jointly funded by the World Bank and the Asian Infrastructure Investment Bank (AIIB). The project demonstrated weak gender and other social design, consultation, implementation, and compensation experiences (BIC Europe, 2017).

The Tarbela 5 project intends to provide low cost, clean, renewable energy, with potentially beneficial gender impacts. An increase in daytime energy available can have numerous benefits for women (e.g. for unpaid household labor, childcare and paid work) (Haves, 2012). However, project documents do not mention improving energy access for the poorest people, let alone on a gender-disaggregated basis.

The Tarbela 5 Extension project is a recent project. The surrounding landscape and community, however, have suffered extreme harms that have not yet been righted. In the 1970s and 1990s, tens of thousands of people were displaced by two previous mega hydropower projects, the Tarbela and Gazi Brarotha projects. Tarbela alone submerged 120 villages. Many project-affected individuals were not given promised alternative land, and almost half of those resettled were sent to provinces that were 'alien to local culture and custom.' There were clashes between newly resettled individuals and their host communities, leading some to return home only to find that their villages no longer existed. Forced relocation compounds women's unpaid care burden in myriad mental and physical ways, including responsibility for packing household belongings, finding new schools and health services, helping household members adjust to often barren environments, and more. These burdens are multiplied for pregnant women. Ultimately, the iterations of resettlement were harmful to project-affected individuals of all genders. Many thousands of families who remain impoverished are still seeking fair compensation and redress for their losses.

The World Bank and AIIB have committed to addressing "social legacy issues" from the previous projects as part of the new Tarbela 5 project,⁸ however, project documents are not clear on the budget or processes to resolve outstanding claims, hear from the affected communities, and address their concerns. Women interviewed in the affected areas in 2017 noted that Tarbela 5 project authorities have not taken measures to accommodate women's meaningful participation in public hearings, responsive to their cultural and other barriers.

If these practices continue in the Tarbela 5 Extension Project, their detrimental effects would violate the AIIB's 2016 ESF, which was scored 'Adequate' for the Resettlement and Compensation Indicator. The ESF commits to taking gender into account in safe resettlement practices, based on a census of persons to be displaced and their assets. The ESF requires that the process must improve or restore the livelihoods of all project displaced persons. Equally, if practices continue, this would violate the World Bank's 2018 ESF, which also scored Adequate on the Resettlement and Compensation Indicator, as it states that in cases where national law fails to recognize

⁸https://www.aiib.org/en/projects/approved/2016/_download/pakistan-tarbela-5/approved_project_summary_tarbela_5_hydropower_extension.pdf

women’s property rights, ‘measures should be considered to provide women as much protection as possible.’

Given the lack of access, mobility and voice of women in the affected areas, AIIB’s commitments to inclusion are welcome. However, it remains to be seen whether project authorities, who previously ignored their needs and concerns, will act in a sufficiently better way during Tarbela 5 implementation. Particular efforts must be made to ensure the voices and concerns of women and girls are heard and addressed by the project developers.

Information for this case is based on the BIC Europe (now Recourse) 2017 report ‘The Asian Infrastructure Investment Bank and the Tarbela 5 hydropower extension project, Pakistan: Learning the hard lessons from the past?’

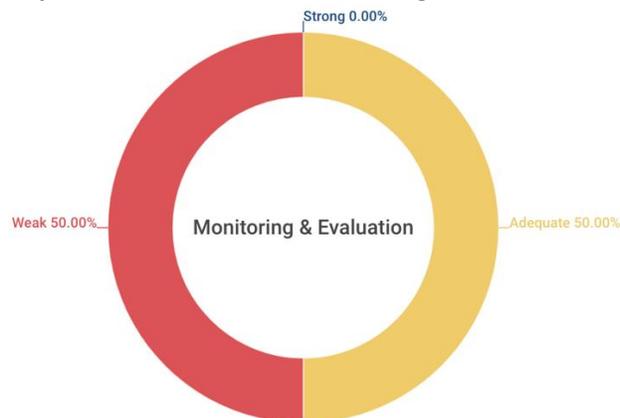
Indicator 8: Gender Monitoring & Evaluation

Definition: The *Monitoring & Evaluation* indicator assesses the extent to which ESFs require the collection and monitoring of baseline and subsequent gender-disaggregated data throughout the project cycle.

Relevance: Monitoring and evaluation is critical to ensuring and refining implementation of project gender equality commitments and avoiding gender discrimination and harmful gender impacts.

Scoring: Graph 22 displays the combined ESF scores for the indicator *Gender Monitoring & Evaluation*. No IFI scored strongly; six adequately (ADB, AfDB, AIIB, BOAD, CDB, EBRD); six weakly (EIB, IDB, IIC, IFC, NDB, World Bank) (see Table 3, 3-A and Annex 5).

Graph 22: ESFs - Gender Monitoring & Evaluation



Recommendations:

All ESFs should:

- Require collection of gender-disaggregated baseline and subsequent monitoring and evaluation data for all components at all project cycle stages.
- Require that projects standardize the collection of gender-disaggregated data which respond to project gender indicators. These data should be incorporated into transparently published project progress reports.

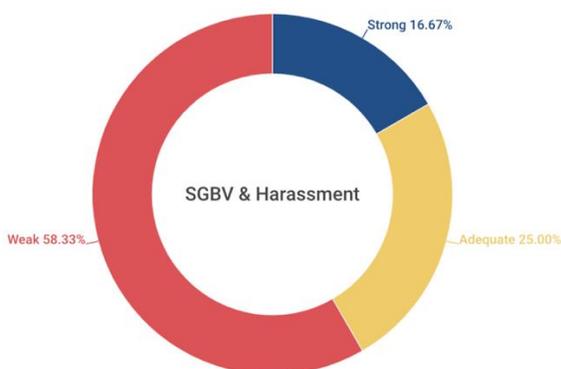
Indicator 9: Sexual and Gender-Based Violence & Harassment

Definition: The *Sexual and Gender-Based Violence (SGBV) & Harassment* indicator analyzes how much ESFs require measures to prevent SGBV, as well as sexual and non-sexual forms of harassment against project-affected women, men, and SGMs. Strong ESFs facilitate victim reporting and incorporate grievance and accountability processes as well as prevention training for project staff.

Relevance: SGBV and sexual harassment are widely underreported globally. It is critical that IFI operations take preemptive measures to prevent and mitigate harm, while also creating environments that are supportive and hospitable to victims who come forward and are in need of support.

Scoring: Graph 23 displays the combined ESF scores for the indicator *SGBV and Harassment*. Two IFIs scored strongly (EBRD, EIB); three adequately (AfDB, CDB, IFC); seven weakly (ADB, AIIB, BOAD, IDB, IIC, NDB, World Bank) (see Table 3, 3-A and Annex 5). Those scoring weakly, over half of the IFIs reviewed, fail to require any training or protection against SGBV and harassment.

Graph 23: ESFs - SGBV & Harassment



Recommendations:

All ESFs should:

- Define SGBV and harassment clearly and require prevention and mitigation measures for all forms. A complete definition should include but not be limited to sexual and non-sexual forms of harassment, exploitation, abuse, assault, coercion, trafficking, and intimidation.
- Require that project staff receive training on SGBV and harassment, with a specific emphasis on rights, reporting, and confidentiality procedures.
- Require projects to establish grievance mechanisms for SGBV and harassment victims.

Case 8: Sexual and Gender-based Violence – the World Bank in Uganda

The World Bank-financed 'Uganda: Second Road Sector Development Programme' (USRSDP), launched in 2013, has become synonymous with combating SGBV in IFI projects. Community members living near the road construction learned that male workers contracted to build the road sexually violated schoolgirls as they traveled to and from secondary school (Joy of Children, 2020). Over 30 girls dropped out of school because they became pregnant. Community members filed a complaint with the World Bank accountability mechanism, the Inspection Panel. Confirmation of the shockingly and deeply harmful impacts on the girls and the community so stunned the World Bank that it canceled financing the road segment; launched a Gender-Based Violence Task Force that recommended how to prevent sexual exploitation and abuse in Bank projects (World Bank, 2017); and financed the Supporting Children's Opportunities through Protection and Empowerment (SCOPE) project to reduce rates of GBV by encouraging Ugandans to report cases of child abuse. The notorious USRSDP has become a do-no-harm example for all IFIs. The World Bank GBV Task Force recommendations now guide most

IFIs on how to avoid SGBV in projects, however imperfectly they are implemented (see Case 9).

Indicator 10: Sexual & Gender Minority Targeting

Definition: The *SGM Targeting* indicator analyzes how much ESFs incorporate specific language promoting protection for SGMs, which IFIs variously identify as the LGBTQ+ population and Sexual Orientation and Gender Identity (SOGI) groups. In recent years, a few IFIs have initiated policies to counter the exclusion of, discrimination against and criminalization of SGMs.

Relevance: SGMs have long been neglected within global gender equality efforts and initiatives. Incorporating specific language and protection for LGBTQ+ people will facilitate decreasing their exclusion and increasing their opportunities to benefit from IFI operations.

The World Bank ESF gets special mention here because immediately following its approval, the President released a directive that bears strongly on gender issues, especially on protecting LGBTQ+ people (see Box 1).

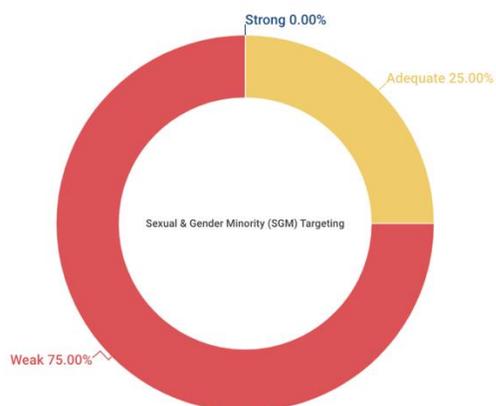
Box 1: World Bank ESF Directive⁹

The World Bank Directive on ‘Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups’ (August 2016) mandates that project staff apply due diligence on behalf of disadvantaged and vulnerable groups. It explicitly aims to ensure projects do not adversely affect individuals and groups based on their sexual orientation and gender identity (SOGI). It directs project staff to assess project risks and impacts and engage with stakeholders to prevent discrimination against individuals and groups based on SOGI. The Directive links to Environmental and Social Standard 1 (ESS1). This World Bank ESF standard, “Assessment and Management of Environmental and Social Risks and Impacts” includes the explicit obligation of “non-discrimination”. Although the Directive links to the ESF, it was *not included* in the original ESF. Nevertheless, requiring project inclusivity of LGBTQ+ people and other vulnerable groups, it represents an important ESF addition.

Scoring: Graph 24 depicts the combined ESF scores for the indicator *Sexual & Gender Minority (SGM) Targeting*. No IFI scored strongly; three adequately (EBRD, EIB, World Bank); nine weakly (ADB, AfDB, AIIB, BOAD, CDB, IDB, IIC, IFC, NDB) (see Table 3, 3-A and Annex 5). This is the weakest indicator in the analysis. The World Bank, one of the three ESFs to receive an Adequate score, is commended for creating a specific Directive related to its ESF that addresses SGMs (see Box 1).

Graph 24: ESFs - Sexual & Gender Minority Targeting

⁹ All ESF components and Directives are listed in this report’s endnotes. Only a World Bank ESF Directive (see Box 1) bears directly on gender issues.



Recommendations:

All ESFs should:

- Define gender identities to include SGMs and explicitly identify the vulnerabilities of SGMs as they do for women and other marginalized groups.
- Integrate SGMs into all gender equality, gender equal rights, and vulnerable groups’ frameworks.
- Ensure all discrimination and harassment policies, grievance and accountability mechanisms, and staff training on GERs to include SGMs.
- Require that projects gender-equally address issues that may arise among or between staff and project-affected individuals due to their sexual orientation and gender identity.

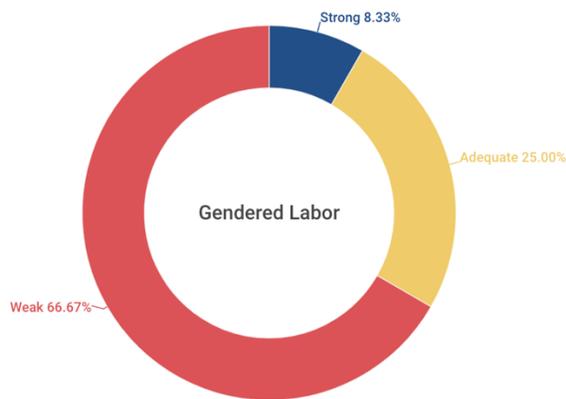
Indicator 11: Gendered Labor

Definition: The *Gendered Labor* indicator analyzes the extent to which ESFs promote measures to eliminate gender-unequal labor conditions (hiring practices, salaries, contracts, occupational health and safety, and protection from harassment and discrimination) and require gender-sensitive labor training (on GERs, GE working conditions, etc. for women and SGMs) for project staff and contractors.

Relevance: Gender dimensions of labor rights and practices in workplaces are often excluded from workplace protections, whether intentional or not. IFI projects must ensure women, men and SGMs have equal access to hiring, contractual and reporting practices.

Scoring: Graph 25 depicts the combined ESF scores for the indicator *Gendered Labor*. One IFI scored strongly (EBRD); three scored adequately (CDB, IIC, World Bank); eight scored weakly (ADB, AfDB, AIIB, BOAD, EIB, IDB (Public), IFC, NDB) (see Table 3, 3-A and Annex 5).

Graph 25: ESFs - Gendered Labor



Recommendations:

All ESFs should:

- Require projects to advertise gender-equal opportunity hiring practices, salary negotiation procedures, contract renewals, and other employment-related procedures.
- Ensure worksite labor protections reduce risks of sexual-related injury, harassment, exploitation, abuse and assault, especially of women and SGMs. Ensure projects provide staff with clear information and training on gender-equal labor protection policies and grievance procedures.
- Ensure project occupational health and safety protocols include workplace accommodations for women and SGMs.
- Require projects hiring laborers to provide separate gender-specific safe sanitation and sleeping facilities to protect all genders from potential harm.

Case 9: Gendered Labor – the AIIB in India

The 2017 AIIB-financed Rural Roads Project in Gujarat, India violated numerous local labor laws and put female workers in danger. Field findings report gender unequal hiring practices, unsafe working conditions, and negative project outcomes for women.

The AIIB's 2016 ESF scored 'Weak' on the Gendered Labor Indicator. It lacks explicit labor protections for women and SGMs, and additionally fails to address unequal labor, occupational health and safety practices. These gaps are reflected in the poor conditions of workers on the project, which affected women disproportionately.

Entire families migrated from remote villages to the worksites, as in customary in India. They expected safe living facilities, promised them by project recruiters. However, no safe living facilities were provided. They slept in open fields, increasing the risk of SGBV against women. Some women workers stated that they experienced sexual harassment and SGBV. The project provided no childcare facilities or private spaces for families to leave their children during the workday, posing risks to young children, especially girls' health and safety. All project workers suffered from poor conditions, working in intense dust and heat with no protective gear, and no access to toilets.

Field interviews with workers revealed that women with higher levels of education and work experience were hired for shorter-term and lower-paid positions than men with less experience. It was also found that no women registered with local welfare boards, leaving them even less protected.

The project outcomes also negatively impacted local populations, especially women. Without consulting project-affected men and women in a timely way, road design and construction failed to account for gender-differentiated use. The roads lack sidewalks used mainly by women and children who have been victims of

accidents on roads that are unable to safely accommodate both pedestrians and cars. Since men are the primary vehicle owners and drivers, the increased risk primarily affects pedestrian women and children.

Information for this case is based on the reports 'AIIB's Road to Inequality: A Gender Case Study from Gujarat' (Darooka and Dand, 2018) and 'Roadblocks: Unmet Gender Promises in AIIB's Gujarat Rural Roads Project' (Bercher et al, 2019).

5. Conclusions and Recommendations

This report analyzed and scored 12 gender policy documents as well as the gender-sensitivity of 12 Environmental and Social Frameworks, covering a total of 12 IFIs. The conclusions and recommendations presented in this section draw patterns from the above analysis, then recommend improvements for these policies and their implementation to avoid harmful, and instead generate beneficial, impacts on the lives of women, men and SGMs.

We are aware that several IFIs are currently updating their ESFs. The ADB, AIIB, IDB and IDB Invest aim to approve new ESFs by the end of 2020. Possibly other IFIs are undertaking a similar process. We hope that the findings and recommendations of this report will be taken on board by IFIs in their proposed policy changes.

To start, a few salient gender policy and ESF gender-sensitivity scoring patterns that emerged from our analyses merit highlighting for lessons upfront. Firstly, on gender policies: The ADB, AfDB and IDB have relatively stronger gender policies than do other IFIs. They commendably emphasize gender equal rights and women's empowerment complementarily. The IDB and EIB also laudably score strongly for mandating implementation of their gender policies.

Secondly, on the gender-sensitivity of ESFs: A majority of IFIs received Weak ESF gender-sensitivity scores. The strongest ESF gender-sensitivity scores were for *Resettlement & Compensation*, with half of ESFs scoring strongly on this indicator. Almost no ESFs received Strong scores for mandating projects to address gender issues, or requiring projects to intersectionally address gender dimensions together with environment and climate, consultation, consent, monitoring and evaluation, class, caste and SGM issues. Thirdly, applying to both gender policies and ESFs: Not one policy received a Strong score for inclusion of and preventing discrimination against sexual and gender minorities.

A key lesson that emerged from our analysis, regardless of individual IFI scoring outcomes, is that while robust IFI gender policies and gender-sensitive ESFs are essential prerequisites for IFI investments that benefit and do not harm men, women, and sexual minorities, their existence alone is insufficient. Strong policies and frameworks are only effective if they are implemented. The case studies demonstrate that while most IFIs over years continue touting adherence to gender policies and ESFs, their investments impacting people on the ground breach these policies. **We therefore strongly call on all IFIs to not only put in place robust mandatory gender policies and gender-sensitive ESFs, but to ensure that all their operations rigorously implement them.**

We will now highlight conclusions on patterns that emerged from the individual indicator assessments for gender policies and ESFs. The conclusions and recommendations below are not presented in a priority order.

IFI gender policies and ESFs must require gender equal rights mandates

Too few gender policies and no ESFs scored Strong on the *Mandate* indicator which assesses the extent to which IFIs mandate that operations promote gender equal rights to prevent harm and promote benefits for women, men and SGMs.

Recommendation: All gender policies and ESFs must be robust and mandatorily require that projects prevent harm to and benefit women, men, and SGMs. They should also facilitate the process for

affected individuals and communities to file complaints and seek redress from project grievance and IFI accountability mechanisms.

IFI policies must include do-no-harm safeguards

It has often taken exposing an IFI-induced earthquake to successfully propel IFIs to undertake good practices to prevent further calamities. World Bank measures to prevent SGBV in investments and to establish a complaint mechanism for project-harmed people were both reactions to publicized calamities which destroyed people's lives. It took exposure of the Uganda road project scandal to motivate the World Bank to design and enforce measures to prevent SGBV (see Case 8). The World Bank Narmada dam project disaster in India pushed the Bank to launch the Inspection Panel to which women, men and SGMs who feel harmed by Bank investments can file complaints to seek redress.¹⁰

Recommendations: IFI policies must contain and apply do-no-harm safeguards to both direct investments and Financial Intermediary (FI) projects to avoid destroying the lives of women, men and SGMs. As the case studies demonstrated, IFIs must have strong policy safeguards but it is equally important that they be rigorously implemented.

IFIs must ensure coherence between gender policies and ESFs

Incoherence within and between gender policies and ESFs includes can undermine intended IFI gender equality outcomes. The analysis noted such incoherence in at least two areas. First, within gender policies, a noticeable scoring gap exists between the *Priorities* and *Mandate* indicators. A number of policies that scored Strong on *Priorities* failed to mandate implementing said priorities, scoring either Adequate or Weak, while no ESFs scored Strong on the mandate indicator. Secondly, incoherence between gender policies and ESFs is reflected in IDB policies. While the IDB scored strongest of all IFIs on its gender policy - for it is the only IFI to have a freestanding gender safeguard policy - all other IDB ESF safeguards scored weakly on gender sensitivity. Conversely, EBRD's gender policy scored weakly yet its ESF gender sensitivity scored strongest among IFIs.

Recommendations: All IFIs need strong mutually-supporting gender policies and gender-sensitive ESFs, which are implemented consistently.

Financial Intermediaries (FIs) should adhere to IFI gender policies and ESFs

Projects financed through FIs compose increasingly large proportions of IFI portfolios (e.g. over half of IFC investments and over 40% of EIB and EBRD's portfolios). Our analysis reveals that neither IFI gender policies nor ESFs address the gender impacts of opaque FI subprojects. The risks of harmful gender impacts are multiplied in the case of FI investments since ESF standards are not rigorously applied to FI subprojects. They usually lack transparency, reducing accountability and access to remedy should gender harms occur."

Recommendations: All IFIs should require FI subprojects to adhere to gender policies and ESFs. This includes disclosing all relevant information on FI-financed subprojects (specifically identifying potential gender, other social and environmental impacts) to permit affected women, men and SGMs to accept or refuse subprojects prior to approval, and/or seek remedy if harm occurs after granting consent.

¹⁰ The World Bank approved the Narmada Sardar Sardover dam project in 1985. Sustained non-violent protests by women activists against the dam's destruction of people's homes and livelihoods led the Indian government to save the World Bank's face by cancelling the remaining \$170 million Bank loan in 1993. Narmada played a key role in the World Bank establishing the Inspection Panel in 1993. For further details see Example 1 of A Guide to Women's Rights and Environmental Justice Advocacy on International Financial Institutions (Zuckerman 2018).

ESFs should address gender-specific aspects of environment and climate impacts

The analysis showed that no ESF scored Strong for addressing the intersection of gender, the environment, and climate. Nine out of 12 ESFs scored weakly and three scored adequately. ESFs hardly acknowledge or address women's primary roles in protecting the environment, managing natural resources (including water and land) and biodiversity ecosystems. They fail to address interrelated climate change, livelihood and health impacts in project-affected areas. Yet the case studies demonstrated adverse climate and ecological effects that especially impacted women's livelihood and health. While some ESFs conduct gender-sensitive environmental assessments in relation to potential displacement and resettlement processes, they rarely do so for broader environmental and climate issues.

Recommendations: All ESFs should require gender-sensitive environmental and climate change impact risk assessments in project-affected areas. They must identify and safeguard women's specific roles protecting the environment, managing natural resources and biodiversity ecosystems in a manner that supports women's livelihoods and health.

ESFs must strengthen gender in resettlement & compensation mechanisms

While ESF resettlement and compensation issues were more gender-sensitive than were other indicators, they miss key gender dimensions including targeting women and girl-child headed households and disbursing compensation gender-equally.

Recommendations: ESFs must require that all displacement, resettlement, and compensation processes address gendered intra-household roles, for example by considering all individuals rather than just one 'head of household,' which is often a man, and ensuring female, including girl-child, headed households are not overlooked and ensure compensation benefits are disbursed gender-equally.

Gender policies and ESFs must collect gender-disaggregated Monitoring & Evaluation (M&E) data

One-third of the IFI gender policies and no ESFs scored Strong for requiring collection of baseline and subsequent M&E gender-disaggregated data for all key components throughout the project cycle. Without these data it is impossible to identify, analyze and apply lessons to strengthen gender achievements and prevent setbacks.

Recommendations: All gender policies and ESFs should require baseline and subsequent M&E gender-disaggregated data collection throughout the project cycle. Meaningful data from interviews with project-affected women, men and SGMs must be included. Project supervision reports and gender policy implementation reviews should reflect these data as the basis for recommending lessons to improve projects. IFIs must share gender-disaggregated M&E data with the public.

Gender policies and ESFs must ensure prevention of all forms of SGBV

Too few gender policies and ESFs require projects to define SGBV and to protect against all forms of SGBV. The case studies demonstrated that this has had detrimental impacts on women, men and SGMs in project areas.

Recommendations: All gender policies and ESFs should define SGBV clearly and require prevention and mitigation measures for all forms, including but not limited to sexual and non-sexual forms of harassment, exploitation, abuse, assault, coercion, trafficking, and intimidation. Policies should require that project staff receive training on harassment and SGBV, with a specific emphasis on rights, reporting, and confidentiality procedures to protect women, men and LGBTQ+ persons. Policies should ensure that workers in projects are trained on harassment and assault, including SGBV deterrence measures, and that mechanisms are in place for justice for victims and survivors of all forms of SGBV.

Gender policies and ESFs must rule out discrimination of SGMs

A handful of IFIs have begun considering discrimination against LGBTQ+ people and providing safeguards to protect them from potential project harm. However, most IFI gender policies, ESFs and operations fail to explicitly do so.

Recommendations: All IFI gender policies and ESFs must explicitly become inclusive of LGBTQ+ people. They must expand anti-discrimination and harassment policies, grievance and accountability mechanisms and staff training to counter discrimination against SGMs. They must also ensure SGMs benefit from projects.

ESFs must ensure full information disclosure and inclusive consultation in cases of resettlement

Summarizing these deeply interconnected indicators together, most ESFs scored Weak on gender-sensitive information disclosure, Adequate on gender-sensitive consultation, and half scored Strong, four Adequate and two Weak on resettlement and compensation. ESFs promise to publicize information and convene gender-inclusive consultations, but they do so too late for affected people to consent to or refuse projects.

Recommendations: ESFs must require that all operations, including FI subprojects, provide full available information and consult with project-affected women, men and SGMs prior to project design. This is the basis for obtaining their consent or refusal to facilitate preventing harmful impacts from project activities, including resettlement. The right to refuse could end the forced resettlement scourge described in this report's cases.

Gender Policies must recognize and reward unpaid care work

Some gender policies recognize unpaid and underpaid care work performed mostly by women, and a few policies promote technologies to alleviate household work. Almost none however promote monetizing care work's massive economic contributions, require remunerating it, or promote measures to distribute it among genders.

Recommendations: IFI gender policies, ESFs and all operations must recognize, make visible, value, and fairly reward unpaid care work, as well as promote distributing care work across genders.

Gender Policies should promote gender equal rights

Gender policy scores on promoting gender equal rights and complementarily empowering women in all IFI operations split equally into five Strong, six Adequate and one Weak.

Recommendations: All gender policies should promote incentives and training for all staff to complementarily integrate and implement gender equal rights and women's empowerment throughout operations.

Gender Policies must commit core funding for gender equality and rights work

One-third of gender policies scored Strong for committing core funding to gender work and referencing additional funding. While this analysis could only evaluate funding which gender policies discussed, we recognize the possibility that IFIs may fund gender priorities through mechanisms external to gender policies and/or may allocate funding after gender policy publication.

Recommendations: All IFIs should allocate sustainable core funding to ensure gender equal rights and other gender goals are promoted institutionally and in all phases of all operations, and resources are available for gender units and gender specialist staff institutionally. IFIs should avoid reliance on restricted, temporary, non-core donor funding for gender work.

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Annexes

Annex 1: Gender Policy Indicator Scoring Criteria

Indicator	Weak	Adequate	Strong
Goals (<i>human rights and/or economic: see Table II</i>)	<ul style="list-style-type: none"> - Only espouses an economic view of gendered issues - Lacks gender-equal rights perspective 	<ul style="list-style-type: none"> - Mentions a gender-equal rights perspective, but does not center it or follow-through 	<ul style="list-style-type: none"> - Upholds a robust gender-equal rights perspective in all efforts - Centers a broad range of gendered issues
Priorities (<i>extent to which policies focus on transformational, in-depth social impacts</i>)	<ul style="list-style-type: none"> - Focuses solely on private sector empowerment 	<ul style="list-style-type: none"> - Orients priorities around traditional “women’s” areas of health, education and agricultural development 	<ul style="list-style-type: none"> - Prioritizes key gender issues (e.g. SGBV) - Crosscuts gender with global priorities such as combating climate change, class inequalities and patriarchy - Emphasizes public and private sector gender-equal leadership
Mandate (<i>extent to which the policy is mandatory or voluntary</i>)	<ul style="list-style-type: none"> - Voluntary or no mandate - Certain types of lending exempt 	<ul style="list-style-type: none"> - Mandatory without a do-no-harm safeguard - Voluntary with solid compliance mechanisms 	<ul style="list-style-type: none"> - Incorporates a mandatory gender safeguard to prevent harm and facilitate taking complaints to Independent Accountability Mechanisms
Mechanisms to Engender Operations (<i>tools to effectively carry out goals and priorities</i>)	<ul style="list-style-type: none"> - Prioritizes gender dialogue with partners without having a gender policy - Provides little detail on implementation strategies - Emphasizes private sector interventions; does not address public or community partners 	<ul style="list-style-type: none"> - Pilots gender programs - Sets strong goals but lacks tools for implementation 	<ul style="list-style-type: none"> - Policy mainstreams gender considerations consistently in operations, country, and public sector strategies, etc. - Develops strong gender macroeconomic policy frameworks - Details implementing strategy
Staffing (<i>training and awareness, incentives in gender policies</i>)	<ul style="list-style-type: none"> - Provides voluntary trainings/workshops or none at all 	<ul style="list-style-type: none"> - Commits to building up gender specialists/ staff - Provides mandatory trainings 	<ul style="list-style-type: none"> - Includes incentives for staff to mainstream gender (e.g. gender in annual performance reviews)
Level of Gender Funding (<i>resources provided for gender work and the reliability of their sources</i>)	<ul style="list-style-type: none"> - Under-resourced - Reliant on temporary non-core donor funding 	<ul style="list-style-type: none"> - Provides funding sources from other departments - Does not specify or commit to sourcing additional funding necessary for gender 	<ul style="list-style-type: none"> - Allocates ample core funding - References additional funding sources - Integrates gender funding with other issue areas, such as environmental and social issue funding

		initiatives mentioned	
Quality of Monitoring and Evaluation Mechanisms <i>(extent to which the policy requires baseline gender-disaggregated data, subsequent M&E, and other indicators)</i>	<ul style="list-style-type: none"> - Produces progress reports not made publicly available - Conducts no M&E - Collects gender-disaggregated data on countries but not Bank operations -Fails to collect gender-disaggregated data at all 	<ul style="list-style-type: none"> - Schedules M&E reports - Incorporates gender considerations into existing frameworks 	<ul style="list-style-type: none"> - Requires M&E in all project phases - Collects and applies baseline and M&E gender-disaggregated data - Transparently shares M&E gender data
Sexual and Gender Minorities <i>(extent to which LGBTQ+ people are included as beneficiaries and protected from harm)</i>	<ul style="list-style-type: none"> - Not mentioned 	<ul style="list-style-type: none"> - Acknowledges LGBTQ+ people -Contains few to no initiatives, programs, or operational initiatives to protect and promote LGBTQ+ rights 	<ul style="list-style-type: none"> - LGBTQ+ people are provided safeguarded protections from potential project harm - Sexual and gender minorities are benefited within program areas
Sexual and Gender-Based Violence <i>(extent to which projects avoid and prevent SGBV)</i>	<ul style="list-style-type: none"> - No mention of guidelines, funding, or initiatives for SGBV - Mentions SGBV only as an economic barrier 	<ul style="list-style-type: none"> - Promotes campaigns, counseling, advisory services, or dialogue with partners - Commits to addressing SGBV only in fragile states - Includes internal safeguarding mechanisms against sexual harassment 	<ul style="list-style-type: none"> - Considers risk in project design - Supports response, protection, and prevention mechanisms - Promotes legal reforms - Requires compensation and services for survivors
Unpaid Care Work <i>(extent to which it is recognized, valued and distributed among genders)</i>	<ul style="list-style-type: none"> - Not mentioned - Invests in road projects and technology to save women’s productive time 	<ul style="list-style-type: none"> - Promotes household labor division in frameworks - Identifies care work as a priority investment area 	<ul style="list-style-type: none"> - Invests in paying for unpaid care economy activities - Funds child- and elder-care -Does not privatize basic services such as health which increases women’s unpaid household care burden

Annex 2: Gender-equal Rights (GERs)

This evaluation of the extent to which gender policies (and their implementation) uphold, undermine, or violate gender-equal human rights, reflected in the Annex 1 indicators, covers the broad spectrum of rights listed below. This Rights list was developed by Zo Randriamaro and expanded by Elaine Zuckerman.

- Right to full information before and throughout the project cycle[EL1]
- Right to free, prior and informed consent on whether to accept or reject projects that affect rights and livelihoods
- Right to participation throughout the project cycle
- Right of access to land
- Right of access to water
- Right to food
- Right to health
- Right to a healthy environment
- Right to life
- Right to work
- Right to the enjoyment of just and favorable work conditions
- Right to an adequate standard of living
- Right to adequate compensation
- Right to freedom from sexual and gender-based violence (SGBV)
- Right to fair payment for unpaid care activities which should be shared across genders

Annex 3: Comparative Analysis & Ranking: 12 IFI gender policies assessed against 10 indicators

Due to page size limitations, the table is broken into four parts:

Part I contains the first six policies (ADB 2019, AfDB 2001, AfDB 2014-2018, BOAD 2012, CDB 2008, EBRD 2009) and the first five indicators.

Part II continues these six policies with the final five indicators.

Part III contains the last six policies (EBRD 2015, EIB 2016, EIB 2018, IDB 2010, IDB 2017, World Bank 2015) and the first five indicators.

Part IV continues the last six policies with the final five indicators.

[Annex 3] Part I

IFI	ADB	AfDB	AfDB	BOAD	CDB	EBRD
Policies (1-6) / Indicators (1-5)	Operational Plan for Priority 2: Accelerating Progress in Gender Equality, 2019-20204 (2019)	Gender Policy (2001)	Gender Strategy: Investing in Gender Equality for Africa’s Transformation (2014-2018)	Policy of the West African Development Bank in Terms of Gender (2012)	Gender Equality Policy and Operational Strategy (2008)	Gender Action Plan (2009)
Goals	<u>Strong</u> - Upholds a robust gender equal rights perspective - Centers a broad range of gendered issues - Commits to eliminating gender biases and inequalities	<u>Adequate</u> - Promotes GM in all projects, programs, and policies to foster human/ economic development - Supports efforts to attain GE	<u>Strong</u> - Promotes both GE through GER and economic empowerment - Creates equal opportunities for wealth creation and promotes equal access to resources	<u>Adequate</u> - Commits to GM for economic development and social equality - Acknowledges but only partially centers GER	<u>Adequate</u> - Uplifts GER but primarily frames empowerment as economic - Focuses primarily on GM and staff roles, targeting only a narrow range of gendered issues	<u>Weak</u> - Promotes GE by increasing women’s economic participation in the private sector - Lacks GER approach
Priorities	<u>Strong</u> - Includes detailed priority pillars, with gender achievement indicators - Prioritizes cross-cutting, intersectional gender issues, including resilience-building for vulnerable people - Emphasizes gender leadership across sectors and improvement in quality of life, skills, and access through gender equity	<u>Strong</u> - Applies cross-cutting gender issues - Prioritizes GE in the areas of education, governance, health, poverty, agriculture, and rural development	<u>Strong</u> - Reduces gender inequalities - Strengthens women’s legal and property rights, and economic empowerment - Enhances internal/ external GE knowledge and capacity	<u>Strong</u> - Prioritizes key, traditional gender issues (agriculture, energy, etc.) - Applies cross- cutting global priorities, such as climate change, class inequality, and patriarchy	<u>Adequate</u> - Prioritizes internal changes such as staff training, without addressing in-depth operational gender issues	<u>Weak</u> - Focuses solely on private sector - Builds internal GM and economic empowerment capacity - Develops GE monitoring and assessment tools

Mandate	<u>Weak</u> - Voluntary	<u>Adequate</u> - Mandatory - Lacks safeguard and complaints mechanism	<u>Weak</u> - Voluntary - Lacks safeguard and mechanisms to ensure compliance - Internal evaluations report limited compliance	<u>Adequate</u> - Mandatory - Lacks safeguards and complaint mechanisms	<u>Adequate</u> - Mandatory; applies to all Bank activities - Lacks safeguard and complaint mechanisms	<u>Adequate</u> - Voluntary - Calls for the formal integration of gender into existing (unofficial) environmental and social safeguards
Mechanisms to Engender Operations	<u>Strong</u> - Consistently mainstreams gender operations across country and public sector strategies - Details implementation strategy, including multifaceted approaches across sectors and themes - Includes tracking and monitoring for gender results, and suggestions for addressing gender issues in project design	<u>Strong</u> - Promotes gender macro-economic policy framework - Incorporates GE into operations manual, country policies, and institutional assessments - Requires that country departments create gender plans of action	<u>Strong</u> - Establishes GM compliance mechanisms and strengthens M&E in all project phases - Prioritizes regional/country GE assessments, operational procedures, and GM guidelines - Scales-up GE internal/external capacity-building	<u>Strong</u> - Integrates GE considerations in macroeconomic activities and sectoral strategies - Includes implementation strategy with specific gender responsibilities for member countries and organizational units	<u>Strong</u> - Requires policies, loans, projects, and strategies to undergo a gender analysis - Includes detailed implementation and accountability strategies - Sensitizes all staff to GE dimensions	<u>Adequate</u> - Establishes a Gender Steering Committee to develop policy - Reviews existing GE components in bank projects - Pilots country gender programs - Creates gender tools and training for project implementation
Staffing	<u>Adequate</u> - Commits to supporting skill-upgrading for female staff and employees - Creates a dedicated gender team, as well as female quotas/targets for leadership positions - Provides leadership training for women; yet fails to require gender	<u>Weak</u> - Provides voluntary training, materials, and guides - Lacks staff incentives	<u>Strong</u> - Recruits local/regional GE staff and national GE consultants - Mandatory GE training - Creates a “network of” gender champions - Provides GE technical assistance - Offers staff incentives	<u>Adequate</u> - Develops voluntary GE reference guides, training programs, and materials - Lacks staff incentives for GM	<u>Strong</u> - Outlines GE responsibilities for all levels of staff - Commits to hiring more GE specialists and consultants - Proposes integrating GE as a core competency in job descriptions and annual assessments	<u>Adequate</u> - Includes mandatory training for staff and Board - Creates a one-year GE specialist position - Fails to include incentives, but proposes a GE awareness assessment

	training for all staff					
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[Annex 3] Part II

IFI	ADB	AfDB	AfDB	BOAD	CDB	EBRD
Policies (1 – 6) / Indicators (6 – 10)	Operational Plan for Priority 2: Accelerating Progress in Gender Equality, 2019-20204 (2019)	Gender Policy (2001)	Bank Group Gender Strategy: Investing in Gender Equality for Africa’s Transformation (2014-2018)	Policy of the West African Development Bank in Terms of Gender (2012)	Gender Equality Policy and Operational Strategy (2008)	Gender Action Plan (2009)
Funding	<u>Adequate</u> - Integrates a variety of funding sources to support gender mainstreaming - Commits to seeking additional funding sources - Fails to specify ample core funding for gender units and gender work	<u>Adequate</u> - Mainstreams gender issues into projects via core funding - Funds neither additional GE initiatives nor staff	<u>Adequate</u> - Allocates funding from gender units, implementing units and dept. budgets - Relies on outside regional funds to grow and leverage more resources	<u>Strong</u> - Allocates core funding for GE initiatives - Training, research, and workshops for GM will be considered in future budgets	<u>Strong</u> - Prioritizes mobilizing core funding to meet GE budget - Grants resources for gender pilot projects and capacity building	<u>Weak</u> - Allocates a small percentage of funding to gender-related projects - Funding from EBRD, Shareholder Special Fund and donors
Monitoring & Evaluation	<u>Adequate</u> - Includes strong mechanisms but fails to explicitly require collection of sex-disaggregated baseline data	<u>Adequate</u> - Implements yearly progress reports - Creates GE indicators for mainstreaming - Collects gender-disaggregated data when possible	<u>Strong</u> Incorporates: - A gender strategy results framework - Scheduled action plans, budgets and midterm strategy reviews - Sex-disaggregated indicators in Results Monitoring Framework	<u>Adequate</u> - Schedules yearly M&E reports that provide GE information on project/Bank beneficiaries - Commits to developing a project evaluation system to measure and mitigate environmental and gender impacts	<u>Strong</u> - Includes strong monitoring framework - Prioritizes integrating gender analysis and data collection in all project phases - Develops capacity to collect and analyze sex- disaggregated data	<u>Weak</u> - Commits to monitoring the impact of existing GE activities - Proposes developing diagnostic tools and collecting relevant data - Lacks requirement for sex-disaggregated data collection
Sexual and Gender	<u>Adequate</u>	<u>Weak</u>	<u>Weak</u>	<u>Weak</u>	<u>Weak</u>	<u>Weak</u>

Minorities	<ul style="list-style-type: none"> - Discusses the importance of intersectionality including sexual orientation and gender identity - Lacks specific protection for SGMs 	<ul style="list-style-type: none"> - Fails to mention LGBTQ+ people, or sexual and gender minorities 	<ul style="list-style-type: none"> - Fails to mention LGBTQ+ people, or sexual and gender minorities 	<ul style="list-style-type: none"> - Fails to mention LGBTQ+ people, or sexual and gender minorities 	<ul style="list-style-type: none"> - Fails to mention LGBTQ+ people, or sexual and gender minorities 	<ul style="list-style-type: none"> - Fails to mention LGBTQ+ people, or sexual and gender minorities
Sexual & Gender-based Violence	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Addresses gender roles in SGBV and states the importance of including men and boys in anti-SGBV work through education, skills training, and public campaigns - Includes SGBV risk in project design, including trafficking and exploitation - Promotes law and policy reforms, and institutional capacity building to address SGBV - Commits to investing in women’s personal security and safety measures, education, and health in relation to SGBV 	<p><u>Weak</u></p> <ul style="list-style-type: none"> - Reflects CEDAW, which names SGBV as a critical area of concern - Lacks guidelines, initiatives, and funding for SGBV 	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Promotes justice sector reforms to protect/advance women’s rights and reduce SGBV - Designs road project safeguards to reduce SGBV 	<p><u>Weak</u></p> <ul style="list-style-type: none"> - Defines SGBV as an issue facing women - Lacks guidelines, initiatives, and funding for SGBV 	<p><u>Weak</u></p> <ul style="list-style-type: none"> - Cites the need to improve responses to gendered rights violations - Lacks guidelines, initiatives, and funding for SGBV 	<p><u>Weak</u></p> <ul style="list-style-type: none"> - Lacks guidelines, initiatives, and funding for SGBV
Care Work	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Acknowledges that childcare is an accessibility issue for mothers attending consultations 	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Division of household labor considered in Gender Analytical Framework - Prioritizes establishing 	<p><u>Adequate</u></p> <ul style="list-style-type: none"> - Prioritizes infrastructure that reduces time spent on household labor - Lacks indicators or 	<p><u>Adequate</u></p> <ul style="list-style-type: none"> - Acknowledges uneven distribution of household labor due to gender roles - Commits to 	<p><u>Weak</u></p> <ul style="list-style-type: none"> - Lacks commitment to address unpaid care work 	<p><u>Weak</u></p> <ul style="list-style-type: none"> - Lacks commitment and implementation plans

	<ul style="list-style-type: none"> - Commits to investments and initiatives that reduce the time poverty burden and household labor disparities, including campaigning for men's role in 'domestic work' - Requires that social protection operations address early childhood development and unpaid care work 	child-care and preschools	<ul style="list-style-type: none"> support for unpaid care work - Reviews internal policies to uplift GE family-friendly policies 	supporting initiatives aimed at reducing this burden		
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[Annex 3] Part III

IFI	EBRD	EIB	EIB	IDB	IDB	World Bank
Policies (7 – 12) / Indicators 1-5	Strategy for the Promotion of Gender Equality 2016-2020 (2015)	The EIB Group Strategy on Gender Equality and Women's Economic Empowerment (2016)	EIB Group Gender Action Plan (2018)	Operational Policy on Gender Equality and Development (2010)	Gender Action Plan for Operations, 2017-2019 (2017)	Gender Strategy (FY 2016-2023) (2015)
Goals	<u>Adequate</u> <ul style="list-style-type: none"> - Promotes GER primarily in regard to equal economic access, resources, and decision-making - Lacks focus on additional critical GE issues 	<u>Strong</u> <ul style="list-style-type: none"> - Frames GM as a cross-cutting issue in all activities - Protects women's human rights - Embeds GE in its business model 	<u>Adequate</u> <ul style="list-style-type: none"> - As an Action Plan, builds on the bank's Strategy of embedding GE in business models - Aims to embed GE in relevant operations 	<u>Strong</u> <ul style="list-style-type: none"> - Promotes men and women reaching their social, economic, political, and cultural potential - Maintains a robust GER approach 	<u>Strong</u> <ul style="list-style-type: none"> - Supports implementation of the Gender Strategy, which has strong goals - Focuses on GER, addressing GE issues such as reproductive rights 	<u>Adequate</u> <ul style="list-style-type: none"> - Focuses on GE as a sound economic policy - Acknowledges GE reproductive and land ownership rights - Lacks GER in other areas
Priorities	<u>Adequate</u> <ul style="list-style-type: none"> - Focuses solely on traditional women's 	<u>Strong</u> <ul style="list-style-type: none"> - Promotes GE in all project phases 	<u>Strong</u> <ul style="list-style-type: none"> - Adds institutional development on 	<u>Strong</u> <ul style="list-style-type: none"> - Invests directly in in-depth GE areas 	<u>Strong</u> <ul style="list-style-type: none"> - Expands quantity and quality of GE 	<u>Strong</u> <ul style="list-style-type: none"> - Focuses on women's social protections and

	<p>issues</p> <ul style="list-style-type: none"> - Prioritizes increased access to financial support, skill opportunities, and social services 	<ul style="list-style-type: none"> - Invests in broad GE issues, such as employment opportunities, social infrastructure, and the care economy 	<p>gender to existing EIB pillars</p> <ul style="list-style-type: none"> - Updates GE content for capacity-building 	<p>(prevention of SGBV, social security reform, etc.) and GM</p> <ul style="list-style-type: none"> - Prioritizes measures to avoid gender exclusion 	<p>operations</p> <ul style="list-style-type: none"> - Prioritizes actions promoting SGBV reform, female leadership, health, and capital development 	<p>leadership in SGBV response and service delivery</p> <ul style="list-style-type: none"> - Removes barriers to women's employment and asset ownership
Mandate	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Safeguard ensures GE assessments and impact mitigation in the 2014 ESP - Lacks mandate 	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Voluntary - Ensures GE in due diligence - Incorporates GE considerations into Environmental and Social Principles and Standards 	<p><u>Adequate</u></p> <ul style="list-style-type: none"> - Voluntary - Contains accountability mechanisms within the ESP 	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Mandatory - Incorporates enforceable gender safeguards 	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Mandatory - Environmental and Social Safeguards Unit systematically applies gender safeguards 	<p><u>Weak</u></p> <ul style="list-style-type: none"> - Voluntary - Expands requirements for gender inclusion in operations
Mechanisms	<p><u>Adequate</u></p> <ul style="list-style-type: none"> - Builds GE capacity through country policy dialogue, partnerships, and best practices sharing - Mainstreams GE into operations by 2020 	<p><u>Adequate</u></p> <ul style="list-style-type: none"> - Disseminates good practices - Sets strong M&E, data collection, training goals, and commits to creating a phased Action Plan, but lacks tools, plan, and designated staff to implement them- 	<p><u>Weak</u></p> <ul style="list-style-type: none"> - Provides an in-depth and detailed list of activities under consideration, but does not provide tools or work plans - Sets goals for data collection, management, and results monitoring - Lacks tools for implementation 	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Requires staff to use GM in all interventions - Creates gender safeguards to assess and mitigate adverse gender impacts - Develops implementation guidelines - Establishes periodic action plans and a results framework 	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Incorporates GE issues in each Country Strategy - Outlines detailed steps for policy dialogue, GM, partnerships, and project design and execution - Offers tools and training on gender for staff and operations 	<p><u>Adequate</u></p> <ul style="list-style-type: none"> - Develops GE frameworks, best practices, partnerships, and capacity-building - States that the Country Management Units will oversee GE operations - Emphasizes working with public and private sectors
Staffing	<p><u>Adequate</u></p> <ul style="list-style-type: none"> - Places Gender Champions in management - Lacks staff incentives - Includes voluntary GE training - Provides child-care 	<p><u>Weak</u></p> <ul style="list-style-type: none"> - Includes voluntary analytical tools, guidance, and trainings for GE - Lacks dedicated gender staff and staff incentives 	<p><u>Weak</u></p> <ul style="list-style-type: none"> - Provides voluntary tools and resources for GM - Delivers capacity-building program for staff and senior management - Lacks incentives 	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Develops voluntary GE sector notes - Includes gender in annual staff evaluations 	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Proposes GE performance reviews, awards, and incentives - Develops sector-specific guidelines that include mitigation measures, GE TAs, grievance redress 	<p><u>Weak</u></p> <ul style="list-style-type: none"> - Offers voluntary tools and training - Lacks clear language on gender training, staff requirements, and incentives

					mechanisms, etc.	
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[Annex 3] Part IV

IFI	EBRD	EIB	EIB	IDB	IDB	World Bank
Policies (7 – 12) / Indicators 6-10	Strategy for the Promotion of Gender Equality 2016-2020 (2015)	Strategy on Gender Equality and Women’s Economic Empowerment (2016)	Gender Action Plan (2018)	Operational Policy on Gender Equality and Development (2010)	Gender Action Plan for Operations, 2017-2019 (2017)	Gender Strategy (FY 2016-2023) (2015)
Funding	<u>Weak</u> - Pursues funding through relevant partnerships (climate, etc.) - Extends donor outreach - Relies on bilateral donor funding	<u>Weak</u> - Fails to mention gender funding sources	<u>Weak</u> - Explores the possibility of developing core funding and talking to private investors	<u>Strong</u> - Proposes direct investments in high impact GE areas - Allocates core funding	<u>Strong</u> - GM and investments to be financed through Bank capital, grants, administrative budgets, trust funds, etc.	<u>Strong</u> - Core funding committed
Monitoring & Evaluation	<u>Adequate</u> - Commits to quantifying gender commitments - Develops gender Performance Monitoring Framework - Lacks a requirement for sex-disaggregated data collection	<u>Weak</u> - M&E only lightly mentioned by calling for the development of a system for sex-disaggregated data collection, results measurement, and monitoring - Lacks tools or frameworks to support these efforts	<u>Adequate</u> - Commits to developing an ambitious system for ongoing sex-disaggregated data collection, results measurement and monitoring - Measures policy success through a planned 2021 strategy	<u>Strong</u> - Indicators measure GM in all project phases - Uses a Development Effectiveness Matrix to determine impact - Requires annual reports, as well as 3-year reports for the Board of Executive Directors	<u>Strong</u> - Contains specific mechanisms, indicators and compliance goals for project design, execution, and monitoring - Disaggregates indicators by sex	<u>Adequate</u> - Collects sex-disaggregated data - Creates partnerships for GE data - Focuses on data collection to monitor countries but not Bank operations

			evaluation and long-term GE measurements	- Collects sex-disaggregated data on project beneficiaries		
Sexual Minorities	<u>Adequate</u> - Addresses sexual orientation as a vulnerability - Commits to collecting data exploring sexual orientation and gender - Lacks guidelines, initiatives, and funding	<u>Weak</u> - Mentions that sexual orientation can exacerbate gender-based vulnerability and exclusion - Lacks guidelines, initiatives, and funding	<u>Weak</u> - Fails to mention LGBTQ+ people, or sexual and gender minorities	<u>Adequate</u> - Commits to analyzing the operational impacts of exclusion based on sexual orientation	<u>Weak</u> - Fails to mention LGBTQ+ people, or sexual and gender minorities	<u>Weak</u> - References a staff resource guide concerning “sexual and gender minority women”
Sexual & Gender-based Violence	<u>Weak</u> - Encourages policy dialogue on SGBV - Lacks guidelines, initiatives, and funding for SGBV	<u>Weak</u> - Acknowledges SGBV as an issue - Lacks guidelines, initiatives, and funding for SGBV	<u>Adequate</u> - Prioritizes recognizing and addressing SGBV as a negative gendered result of projects - Revises due diligence frameworks to mitigate potential SGBV risks	<u>Strong</u> - Prioritizes direct investment to prevent SGBV - Supports measures like surveillance systems when SGBV risk is identified in projects	<u>Strong</u> - Strengthens justice system responses to SGBV - Expands services for survivors - Coordinates SGBV prevention/ response - Promotes female leadership in security and justice sectors	<u>Strong</u> - Supports SGBV response interventions, and integrates SGBV components across sectors - Creates SGBV staff resources
Care Work	<u>Weak</u> - Lacks commitment and implementation plans	<u>Strong</u> - Invests in projects related to care economy enterprises - Supports social infrastructure that benefits women participating in care work	<u>Strong</u> - Prioritizes investing in the care economy - Outlines steps to begin supporting care infrastructure	<u>Strong</u> - Names unequal distribution of care labor as a priority investment area - Commits to providing resources, where appropriate, so that men and women may participate equally in projects	<u>Strong</u> - Acknowledges household disparities - Supports care services and policies that professionalize and redistribute care work	<u>Adequate</u> - Scales up the supply of care centers for young children - Lacks additional commitment to investment in care work

Annex 4: Environmental and Social Framework (ESF) Indicator Scoring Criteria

Indicator	Weak	Adequate	Strong
Gender Mandate/Safeguard <i>(contains a 'do no harm' gender safeguard)</i>	- No mention	- Mentions do no harm gender safeguards and/or principles, includes/specifies gender as a focus within social safeguards	- Mandates a do no harm gender safeguard which prevents discrimination and facilitates taking complaints to project grievance and/or IFI international accountability mechanisms
Gender in Environmental and Social Risk Assessments <i>(extent to which ESF incorporates gendered issues into environmental and social project risk assessments)</i>	- No mention	- Suggests gendered risk assessments, or incorporates gender into a few (not all) risk assessments - Requires gender assessments/analyses for projects categorized as high-risk	- Requires that gender be incorporated into all risk assessments
Gender Discrimination & Rights <i>(extent to which ESF requires protection against gender discrimination and promotes GERS in all operations through mechanisms, policies, and staff training)</i>	- No mention	Promotes or includes statements on gender non-discrimination and GERS; offers voluntary training for project staff on gender non-discrimination GERS	- Requires that all operations protect against gender discrimination and promote GERS - Requires training for all project staff on gender non-discrimination and GERS
Gender in Environment and Climate <i>(extent to which ESF addresses gender roles in handling water, land, and biodiversity in project-affected areas; relates the climate crisis to women's livelihoods and health)</i>	- No mention	- Mentions but does not require targeting women with environmental and climate protection measures	- Requires environmental, climate and biodiversity protection mechanisms, especially for women who play primary roles managing natural resources and ecosystems in project-affected areas
Gender & Information Disclosure <i>(extent to which ESF requires borrowers, project staff and contractors to gender-sensitively disclose full information, prior to project design, to all project-affected people)</i>	- No mention	- Discloses partial project information to reach affected women, men, and SGMs - Fails to use effective mechanisms to reach the illiterate and unconnected who are more often women than men - Discloses information only after project design	- Discloses all known project information by requiring effective, gender-sensitive mechanisms to reach affected women, men, and SGMs prior to project design - Addresses the need to incorporate specific mechanisms to reach illiterate, unconnected, and vulnerable individuals
Gendered Consultations and Consent (FPIC a priori) <i>(extent to which ESF requires Free Prior and Informed Consent (FPIC), which traditionally requires consent from indigenous communities prior to project actions that affect their land and resource rights, gender-sensitively applies to all project-affected)</i>	- No mention	- Suggests information be shared with women, men, and SGMs and mentions FPIC	- Requires separate gender-sensitive consultations with project-affected women, men, and SGMs after providing them with all known project information prior to project design and approval - Explicit, informed consent is required

<i>people)</i>			
Gender in Resettlement & Compensation <i>(extent to which ESF includes gender-equal resettlement and compensation measures based on project-affected women, men and SGMs consenting to resettlement and compensation terms, and provides guidance on land rights)</i>	- No mention	- Acknowledges women’s and men’s differential losses from resettlement and proposes compensation	- Requires seeking gendered voices on consent to resettle or not; if so, provides full compensation ensuring new housing and land that is equal to or better than pre-settlement - Addresses cultural, social and economic disruption to women’s lives - Grants compensation to women who may not be recognized landowners in their region, whether due to local, national, tribal, or customary law
Gender Monitoring and Evaluation (M&E) <i>(extent to which ESF requires baseline and regular collection of gender-disaggregated data on all key project components)</i>	- No mention	Suggests collecting project baseline and subsequent gender-disaggregated monitoring data	Requires collecting project baseline and subsequent gender-disaggregated monitoring and evaluation data
SGBV & Harassment <i>(extent to which ESF requires measures to prevent SGBV, as well as sexual and non-sexual forms of harassment against project-affected people; facilitates victim reporting; incorporates grievance and accountability processes and training for project staff)</i>	- No mention of SGBV or harassment, or solely defines SGBV and harassment without any safeguards against it	- Defines SGBV and harassment - Suggests prevention of SGBV and harassment training for staff and/or contractors	- Requires project measures to prevent SGBV and harassment including staff and contractor training - Includes victim reporting, grievance and accountability processes
Sexual & Gender Minorities (SGM) <i>(extent to which ESF incorporates specific language promoting protection for SGMs / LGBTQ+ people)</i>	- No mention	- Mentions LGBTQ+ as a vulnerable population - Acknowledges that SGMs need specific project protection and benefits	- Requires protective practices and targets benefits for SGMs
Gendered Labor <i>(extent to which ESF defines protection for women and SGMs in relation to unequal and inequitable labor conditions (salaries, contracts, harassment, discrimination, and safety); provides gender-sensitive labor training for project staff and contractors (GERs, GE working conditions, awareness, etc.)</i>	- No mention of GE labor condition protections	- Provides definitions, or acknowledges GE labor protections	- Requires strong GE standards for staff and contractors in their recruitment/ hiring/ management/ treatment/ payment of workers - Prevents gender inequality among project hires (salaries, gendered hiring discrimination, SGBV, etc.)

Annex 5: Comparative Analysis & Ranking: 12 Environmental & Social Frameworks assessed against 11 indicators

Due to page size limitations, the table is broken into four parts:

Part I contains the first six ESFs (ADB 2009, AfDB 2014, AIIB 2016, BOAD 2015, CDB 2014, EBRD 2019) and the first six indicators.

Part II continues these six ESFs with the final five indicators.

Part III contains the last six ESFs (EIB 2018, IDB (Public) 2006, IIC (IDB Invest) 2013, IFC 2012, NDB 2016, World Bank 2018) and the first six indicators.

Part IV continues the last six ESFs with the final five indicators.

[Annex 5] Part I

IFI	ADB	AfDB	AIIB	BOAD	CDB	EBRD
ESF Documents (1-6)/ Gender sensitivity Indicators (1-6)	Safeguard Policy Statement (2009)	AfDB's Integrated Safeguards System; Policy Statement and Operational Safeguards (2014)	Environmental and Social Framework (2016)	Environmental and Social Management in the Financing of Projects (2015)	Environmental and Social Review Procedures (2014)	Environmental and Social Policy (2019)
Gender Mandate/ Safeguard	<u>Adequate</u> - Requires gender issues be addressed in the three SPS safeguard priority areas (environment, involuntary resettlement, and indigenous peoples) - Lacks a do no harm gender safeguard	<u>Adequate</u> - Incorporates gender sections into the five Operational Safeguards - Lacks a do no harm gender safeguard	<u>Adequate</u> - Encourages clients to identify gender-specific impacts and develop mitigation measures to reduce them - Lacks a do no harm gender safeguard	<u>Weak</u> [see Footnote 2] - Directs all projects to the Bank's gender mainstreaming policy - Lacks a do no harm gender safeguard	<u>Weak</u> - Lacks a do no harm gender safeguard	<u>Adequate</u> - Suggests clients identify potential disproportionate adverse gender impacts and develop mitigation measures to reduce them - Lacks a do no harm gender safeguard
Gender in Environmental & Social Risk Assessments	<u>Weak</u> - Fails to require that gender be incorporated into environmental and social risk assessments	<u>Adequate</u> - States that the Bank will carry out a gender assessment for every project as the basis for project design - Fails to require that	<u>Adequate</u> - Encourages but does not require clients to incorporate gender into all risk assessments	<u>Adequate</u> - Suggests gendered risk assessments for some project categories - Fails to require that gender be incorporated into environmental and	<u>Adequate</u> - Fails to require that gender be incorporated into environmental and social risk assessments - Requires gender analyses that include	<u>Strong</u> - Incorporates gender into all risk assessments - States that clients will conduct additional risk assessments when there are worker gender

		gender be incorporated into environmental and social risk assessments		social risk assessments	collection of gender-disaggregated data in projects pre-screened to be high-risk	and health issues
Gender Discrimination & Rights	<u>Weak</u> - Lacks protective mechanisms against gendered discrimination - Fails to require training for project staff on GERS and non-discrimination	<u>Adequate</u> - Includes a non-discrimination policy that requires clients to take special measures in relation to women, such as preventing social exclusion and employment inequalities towards those with family responsibilities - Fails to require that all operations promote GERS - Lacks training for staff on discrimination and GERS	<u>Weak</u> - Suggests measures to ensure that discrimination is mitigated “to the extent possible” for vulnerable groups yet fails to specify gender - Lacks protection against gender discrimination and GERS training for project staff	<u>Weak</u> - Lacks protective mechanisms against gendered discrimination - Fails to require training for project staff on GERS and non-discrimination	<u>Adequate</u> - Ensures that employment practices require non-discrimination on the grounds of sex, as well as measures to prevent harassment, intimidation, and/or exploitation, especially in regard to women - Lacks staff training on gender non-discrimination and GERS	<u>Strong</u> - States that decisions cannot be made on the basis of sexual orientation or gender identity - Requires protection from harassment, exploitation, abuse, and gendered violence - Requires project staff training on ES safeguards
Gender in Environment & Climate	<u>Adequate</u> - Requires gender-sensitive environmental assessments and protective mechanisms when project adversely impacts biodiversity and natural resources - Fails to require targeting women with environmental and climate-related protection measures	<u>Weak</u> - Fails to address gender in relation to environmental protection, climate or biodiversity	<u>Weak</u> - Fails to address gender in relation to environmental protection, climate or biodiversity	<u>Weak</u> - Fails to address gender in relation to environmental protection, climate or biodiversity	<u>Weak</u> - Fails to address gender in relation to environmental protection, climate or biodiversity	<u>Adequate</u> - States that gender and climate change risks shall be considered throughout the assessment process - Fails to require targeting women with environmental and climate-related protection measures

Gender & Information Disclosure	<u>Weak</u> - Fails to require disclosure of all known project information prior to project design in ways that take into account illiteracy and access to media which usually disadvantages women more than men	<u>Weak</u> - Fails to require disclosure of all known project information prior to project design in ways that take into account illiteracy and access to media which usually disadvantages women more than men	<u>Strong</u> - Requires that clients ensure relevant information about environmental and social risks be made available to project-affected people - States that process should be gender-inclusive, accessible, responsive and tailored to the needs of vulnerable groups	<u>Adequate</u> - Requires informing women and other vulnerable people of project details related to resettlement - Fails to specify information disclosure prior to project design - States that projects must make intentional efforts to include vulnerable and rural groups – including women – who are often unreachable	<u>Weak</u> - Requires timely disclosure of relevant “information in a form that can be easily understood and accessed by affected people,” but lacks gender-specific provisions	<u>Strong</u> - Requires that information be disclosed in an accessible manner prior to project design with regard to gender, language, literacy, and other vulnerability factors
Gendered Consultations & Consent <i>(FPIC¹¹ a priori)</i>	<u>Adequate</u> - Details a Resettlement Action Plan that includes consultations during which the client “will pay particular attention to the concerns of indigenous women and youth” - Requires that all consultations are “gender inclusive and responsive” - Fails to specify that	<u>Adequate</u> - Suggests that information be shared with women through active consultation processes that address barriers to participation - Fails to require consultation prior to project design	<u>Adequate</u> - Requires that projects provide forums for meaningful public consultations, which are ‘gender inclusive, accessible, responsive,’ and tailored to ensure the participation of women - Fails to require that informed consent be obtained from all affected women, men	<u>Adequate</u> - Requires FPIC but only for indigenous people - Includes gender-specific consultations at project preparation and implementation stages	<u>Adequate</u> - Requires that borrower conducts meaningful consultations that are “gender inclusive and responsive” - Highlights the interests of both women and men in resettlement consultations in selecting compensation options, development packages and mitigation	<u>Adequate</u> - Provides consultation and outreach plan, which must be tailored to gender needs - Includes specific characteristics for engaging vulnerable groups, including women - Fails to require consultations prior to project design

¹¹FPIC stands for “Free, Prior and Informed Consent. FPIC is a specific right that pertains to indigenous peoples and is recognized in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). It allows them to give or withhold consent to a project that may affect them or their territories.” Food and Agriculture Organization (FAO) of the United Nations, 2020. <http://www.fao.org/indigenous-peoples/our-pillars/fpic/en/>. Gender Action believes that everyone affected by development projects has the right to receive full information about and accept or refuse projects a priori i.e. when projects are identified prior to design and approval.

	consultations take place prior to project design		and SGMs; stipulates FPIC as a requirement only for indigenous people		measures - Fails to require projects obtain explicit consent let alone by gender	
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[Annex 5] Part II

IFI	ADB	AfDB	AIIB	BOAD	CDB	EBRD
ESF documents (1-6)/ Gender sensitivity Indicators (7-11)	Safeguard Policy Statement (2009)	AfDB’s Integrated Safeguards System; Policy Statement and Operational Safeguards (2014)	Environmental and Social Framework (2016)	Environmental and Social Management in the Financing of Projects (2015)	Environmental and Social Review Procedures (2014)	Environmental and Social Policy (2019)
Gender in Resettlement & Compensation	<p><u>Adequate</u></p> <ul style="list-style-type: none"> - Requires compensation at full replacement cost and tries to improve standards of living to at least minimum standards for “displaced poor and other vulnerable groups, including women” - Ensures that displaced persons without titles or legal rights to land are eligible for compensation, but fails to connect this issue to predominantly women’s lack of legal land rights - Lacks requirement for gendered consent on resettlement 	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Requires a resettlement plan survey with gender-disaggregated data and compensation at full replacement cost - Registers land and assets in the name of both spouses; also registers single-headed households regardless of gender - States that processes should include public hearings and allow alternative resettlement proposals with efforts to include women throughout 	<p><u>Adequate</u></p> <ul style="list-style-type: none"> - States that consultation processes should take “gender into account regarding land ownership and customary rights to natural resources” when considering customary/ communal/ collective forms of land tenure - Requires that project conducts a census of persons to be displaced including their assets/ tenure, taking gender into account - States that resettlement process must improve or restore livelihoods of all project displaced persons, yet 	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Requires that women, including landless women, are represented and thus able to express concerns throughout resettlement planning and implementation - Includes mechanisms for women to communicate concerns to project authorities - States that social and economic compensation benefits should be gender-inclusive 	<p><u>Weak</u></p> <ul style="list-style-type: none"> - Suggests that projects ‘pay particular attention to the interests of both men and women in resettlement’ - Fails to address the issue of land rights in regions where women are not legally recognized landowners 	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Requires gender assessments, surveys, and monitoring within resettlement processes - Outlines mechanisms for women to participate in resettlement processes - Requires clients to analyze women’s land ownership and co-ownership to determine compensation - Allows women and men to request alternatives to land and/or cash compensation - Requires consent from all project-affected individuals

			fails to specify gender-sensitivity in these instances			
Gender Monitoring & Evaluation (M&E)	<u>Adequate</u> - Lacks requirement for gender-disaggregated baseline and subsequent M&E data collection - Requires gender-disaggregated data only for economic and socio-cultural conditions of displaced persons in resettlement social impact assessments	<u>Adequate</u> - Lacks requirement for gender-disaggregated baseline and subsequent M&E data collection - Suggests but does not require applying gender performance indicators to evaluate projects	<u>Adequate</u> - Encourages but does not require gender-disaggregated data collection and analysis to promote women’s socio-economic empowerment “where relevant” - Lacks gender-specific mechanisms for M&E	<u>Adequate</u> - Lacks requirement for non-resettlement gender-disaggregated baseline data - Promotes gender-disaggregated data monitoring within resettlement planning only	<u>Adequate</u> - Requires that resources be allocated to conduct analyses (such as gender analyses) that includes the collection of gender-disaggregated data in projects pre-screened to be high-risk - Fails to require gender-disaggregated baseline data, lacks gender-specific M&E guidance	<u>Adequate</u> - Fails to require gender-disaggregated baseline data for project activities except resettlement - Requires client to conduct socio-economic surveys that identify gender issues and collect gender-disaggregated baseline data, during resettlement
SGBV & Harassment	<u>Weak</u> - Fails to require protection against SGBV and harassment - Lacks grievance and accountability processes for SGBV and harassment victims, as well as SGBV and harassment training for project staff	<u>Adequate</u> - Requires that client must take special measures to address harassment, intimidation, and/or exploitation of women - States that revised sector-specific guidance notes will include staff training on safeguards but lacks mention of SGBV and harassment - Lacks grievance and accountability mechanisms for SGBV and harassment	<u>Weak</u> - Commits to review ‘all allegations of unlawful and abusive acts of project security workers,’ yet fails to specify SGBV or gender-related harassment - Creates a project grievance mechanism to register social complaints but similarly fails to specify SGBV and gendered harassment	<u>Weak</u> - Fails to require protection against SGBV and harassment - Lacks grievance and accountability processes for project-affected people, as well as SGBV and harassment training for project staff	<u>Adequate</u> - Requires that borrowers implement measures to prevent harassment, intimidation, and/or exploitation, especially in regard to women in employment - States that occupational health and safety screenings should give attention to specific risks for women’s safety, including safety from sexual and gender-based violence - Lacks victim reporting, grievance, and	<u>Strong</u> - Requires that clients develop mitigation and prevention measures to reduce sexual harassment, exploitation and abuse, gender-based violence, bullying, and intimidation - Acknowledges the risk of SGBV from outside workers on local communities - Guarantees confidential reporting processes and support mechanisms for those reporting abuse

					accountability processes	
Sexual & Gender Minority (SGM) Targeting	<u>Weak</u> - Fails to mention SGMs - Lacks protective mechanisms for SGMs	<u>Weak</u> - Fails to mention SGMs - Lacks protective mechanisms for SGMs	<u>Weak</u> - Fails to mention SGMs - Lacks protective mechanisms for SGMs	<u>Weak</u> - Fails to mention SGMs - Lacks protective mechanisms for SGMs	<u>Weak</u> - Fails to mention SGMs - Lacks protective mechanisms for SGMs	<u>Adequate</u> - Defines vulnerability as being affected by gender, gender identity and sexual orientation - States that employment decisions cannot be made on the basis of sexual orientation or gender identity - Lacks additional protective mechanisms for SGMs
Gendered Labor	<u>Weak</u> - Lacks labor protection for women and SGMs - Fails to mention gender in relation to hiring practices, occupational health, and safety protocols	<u>Weak</u> - Lacks labor protection for women and SGMs - Fails to mention gender in relation to hiring practices, occupational health, and safety protocols	<u>Weak</u> - Lacks labor protection for women and SGMs - Fails to mention gender in relation to hiring practices, occupational health, and safety protocols	<u>Weak</u> - Lacks labor protection for women and SGMs - Fails to mention gender in relation to hiring practices, occupational health, and safety protocols	<u>Adequate</u> - Fails to require gender-specific protections for hiring practices and contractors - Includes gender-specific risks such as women's safety from sexual and gender-based violence in impact assessment screening for occupational health and safety	<u>Strong</u> - Includes explicit labor protections for women - Requires intrahousehold analysis to assess labor divisions in the home - Specifies gender hiring standards for contractors - Requires reducing potential health and injury risks, especially for women identified by risk assessments

[Annex 5] Part III

IFI	EIB	IDB (Public)	IIC (IDB Invest)	IFC	NDB	WB
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ESF documents (7-12) / Gender sensitivity Indicators (1-6)	<u>Environmental and Social Standards</u> (2018)	<u>Environment and Safeguards Compliance Policy</u> (2006)	<u>Environmental and Social Sustainability Policy</u> (2013)	<u>Performance Standards</u> (2012)	<u>Environmental and Social Framework</u> (2016)	<u>Environmental and Social Framework</u> (2018)
Gender Mandate/ Safeguard	<u>Adequate</u> - Includes a Standard on the Rights and Interests of Vulnerable People that focuses primarily on women - Fails to mention gender within additional social standards	<u>Adequate [see Endnote]</u> - Contains a mandatory gender safeguard within the ESCP (see Annex X) - Fails to address gender issues within the other ESCP environmental and social safeguards	<u>Weak [see Endnote]</u> - Adheres to the IDB ESCP including its gender safeguard policy - Fails to address gender within the remaining ESCP safeguards to which ESSP adheres	<u>Weak</u> - Lacks direct mention of and protection for women and SGM ¹² - Fails to include a do no harm gender safeguard	<u>Weak</u> - Lacks a do no harm gender safeguard	<u>Weak</u> - Lacks a do no harm gender safeguard
Gender in Environmental & Social Risk Assessments	<u>Weak</u> - Fails to specifically require gender be incorporated into risk assessments	<u>Weak</u> - Fails to specifically require gender be incorporated into risk assessments	<u>Weak</u> - Fails to specifically require gender be incorporated into risk assessments	<u>Weak</u> - Fails to incorporate gender into environmental and social risk assessment processes	<u>Weak</u> - Fails to require that gender be incorporated into risk assessments	<u>Weak</u> - Fails to require that gender be incorporated into risk assessments - Overlooks women and SGMs within the social risk assessments' definition of a 'vulnerable group'
Gender Discrimination & Rights¹³	<u>Adequate</u> - States that people are entitled to an adequate standard of living without gender discrimination - Provides voluntary staff training on gendered harassment and discrimination - Fails to require all operations promote	<u>Weak</u> - States the importance of reducing segregation and discrimination only in labor markets and solely for indigenous women (not all women and SGMs) - Lacks clear definitions, protective mechanisms, and staff training on discrimination and GERS	<u>Adequate</u> - Commits to "good international practice" that upholds human rights including gender equality in all projects - Lacks protective mechanisms and staff training on gender discrimination and GERS	<u>Adequate</u> - Prohibits discrimination on the basis of sex or gender yet fails to provide compliance mechanisms and guidance - Lacks protective mechanisms and staff training on discrimination and GERS	<u>Weak</u> - Lacks clear definitions, protective mechanisms, and staff training on discrimination and GERS	<u>Weak</u> - Fails to mention gender within proposed discrimination and equal opportunity procedures - Lacks protective mechanisms and staff training on discrimination and GERS

¹² Gender Action's summary 2017 Gender Analysis of the International Finance Corporation (IFC) Environmental and Social Performance Standards concluded that overall, the IFC 'hardly addresses women's rights and gender justice issues' and overlook SGMs entirely.

¹³

	GERs					
Gender in Environment & Climate	<u>Weak</u> - Mentions the need for environmental protection for human health and sustainable biodiversity practices but fails to address intersecting gender issues and incorporate specific protection for women	<u>Weak</u> - Fails to address gender in relation to environmental protection, climate or biodiversity	<u>Weak</u> - Fails to address gender in relation to environmental protection, climate or biodiversity	<u>Adequate</u> - References gender in relation to the environment, yet only for land resettlement and compensation review - Fails to otherwise provide targeted gendered environmental protection in project-affected areas	<u>Weak</u> - Fails to address gender in relation to environmental protection, climate or biodiversity	<u>Weak</u> - Fails to address gender in relation to environmental protection, climate or biodiversity
Gender & Information Disclosure¹⁴	<u>Adequate</u> - States that information disclosure and dissemination must take into account literacy, gender relations, and access to media, which are particularly relevant to women in rural regions - Fails to require disclosure prior to project design	<u>Weak</u> - Fails to require disclosure of all known project information prior to project design in ways that take into account illiteracy and access to media which usually disadvantages women more than men	<u>Weak</u> - Fails to require disclosure of all known project information prior to project design in ways that take into account illiteracy and access to media which usually disadvantages women more than men	<u>Adequate</u> - States that women should be informed and consulted during planning, implementation, monitoring, and evaluation of resettlement compensation - Fails to incorporate gender requirements into other project disclosure processes	<u>Weak</u> - Fails to require disclosure of all known project information prior to project design in ways that take into account illiteracy and access to media which usually disadvantages women more than men	<u>Weak</u> - Fails to require disclosure of all known project information prior to project design in ways that take into account illiteracy and access to media which usually disadvantages women more than men
Gendered Consultations & Consent (FPIC a priori)	<u>Adequate</u> - Acknowledges the benefits of gender-separate consultations	<u>Weak</u> - Fails to incorporate gender-sensitive consultations	<u>Adequate</u> - Broadly requires 'the avoidance of gender-based exclusion in	<u>Weak</u> - Requires gender-sensitive consultations only for resettlement	<u>Adequate</u> - States that consultations must be gender-inclusive and	<u>Adequate</u> - Mentions FPIC only in relation to indigenous peoples; fails to require

¹⁴ No IFI Financial Intermediary loans disclose project information to affected people making it impossible for those affected to consent or refuse projects and/or requests design improvements.

	<p>and the importance of not limiting consultations to heads of communities/ households, which can often exclude women</p> <ul style="list-style-type: none"> - States that consultation should take into account and be, 'responsive to the needs, rights and interests of both women and men' - Fails to require project consent from women, men and SGMs prior to project design 	<ul style="list-style-type: none"> - Fails to require project consent from women, men and SGMs prior to project design 	<p>public consultations for all IIC-financed projects</p> <ul style="list-style-type: none"> - Fails to require project consent from women, men and SGMs prior to project design 	<p>processes</p> <ul style="list-style-type: none"> - Fails to require project consent from women, men and SGMs prior to project design 	<p>responsive</p> <ul style="list-style-type: none"> - Requires meaningful consultation but Fails to require consultations prior to project design 	<p>FPIC by genders</p> <ul style="list-style-type: none"> - Includes a specific community engagement process for indigenous people, with a requirement to be gender-inclusive - Requires that consultation processes ensure women's perspectives are included in all aspects of resettlement planning and implementation
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[Annex 5] Part IV

IFI	EIB	IDB (Public)	IIC (IDB Invest)	IFC	NDB	WB
ESF documents (7-12) / Gender sensitivity Indicators (7-11)	Environmental and Social Standards (2018)	Environment and Safeguards Compliance Policy (2006)	Environmental and Social Sustainability Policy (2013)	Performance Standards (2012)	Environmental and Social Framework (2016)	Environmental and Social Framework (2018)
Gender in Resettlement & Compensation	<p>Strong</p> <ul style="list-style-type: none"> - Requires that gender dynamics be 'duly observed and taken into account' throughout resettlement assessment processes - Requires that compensation measures be implemented without gender discrimination - Specifies that clients 	<p>Adequate</p> <ul style="list-style-type: none"> - Includes guidance on gender-specific data collection and analysis for resettlement - Requires a detailed analysis of socio-economic factors, including gender, to determine risks and design measures to minimize them within the compensation 	<p>Weak</p> <ul style="list-style-type: none"> - Lacks mechanisms to address gender roles within resettlement and compensation processes 	<p>Strong</p> <ul style="list-style-type: none"> - Stipulates that the resettlement consultation process should ensure that 'women's perspectives are obtained, and their interests factored into all aspects of resettlement planning and implementation' - Recognizes women's land ownership in cases 	<p>Strong</p> <ul style="list-style-type: none"> - Requires a gender-sensitive social impact assessment during resettlement planning processes - Requires that clients improve the standard of living for displaced women to national minimum standards - Specifies that clients must pay particular 	<p>Adequate</p> <ul style="list-style-type: none"> - States that in cases where national law fails to recognize women's property rights, 'measures should be considered to provide women as much protection as possible' - Includes compensation benefits for women (skills training, access to credit, and job

	must ensure equal treatment of women and men in regard to land rights, assets, and relocation assistance, even when not recognized in formal law	process - States that community consultations will take into account 'characteristics' of the population, but fails to require gender-sensitivity		where national law does not	attention to women, including those without legal land titles - Establishes a culturally appropriate and gender-inclusive grievance mechanism for resettlement processes	opportunities) - Suggests that women's preferences for compensation mechanisms (such as land replacement or alternative access to natural resources) should be explored
Gender Monitoring & Evaluation (M&E)	<u>Weak</u> - Lacks requirement for gender-disaggregated baseline and subsequent M&E data collection - Requires monitoring women's protection during resettlement processes only	<u>Weak</u> - Lacks requirement for gender-disaggregated baseline and subsequent M&E data collection	<u>Weak</u> - Lacks requirement for gender-disaggregated baseline and subsequent M&E data collection	<u>Weak</u> - Lacks requirement for gender-disaggregated baseline and subsequent M&E data collection	<u>Weak</u> - Lacks requirement for gender-disaggregated baseline and subsequent M&E data collection	<u>Weak</u> - Lacks requirement for gender-disaggregated baseline and subsequent M&E data collection
SGBV & Harassment	<u>Strong</u> - States that policies and a complaints mechanism shall be put in place to deal with sexual harassment - States that specialized staff "will especially endeavour to protect women and girls from sexual violence and harassment" - Requires implementation of gendered-harassment protection training and	<u>Weak</u> - Fails to require protection against SGBV and harassment - Lacks grievance and accountability processes for project-affected people, as well as SGBV and harassment training for project staff	<u>Weak</u> - Fails to require protection against SGBV and harassment - Lacks grievance and accountability processes for project-affected people, as well as SGBV and harassment training for project staff	<u>Adequate</u> - Requires that clients take measures to prevent and address harassment, intimidation, and exploitation such as hazardous physical, psychological, or sexual abuse in project workplaces - Lacks additional protection for SGBV, such as grievance and accountability processes and training for project	<u>Weak</u> - Fails to require protection against SGBV and harassment - Lacks grievance and accountability processes for project-affected people, as well as SGBV and harassment training for project staff	<u>Weak</u> - Fails to require protection against SGBV and harassment - Lacks grievance and accountability processes for project-affected people, as well as SGBV and harassment training for project staff ¹⁵

¹⁵Complementing the ESF the WB provides a Sexual Orientation and Gender Identity (SOGI) Good Practice Note (GPN) to help Bank staff support borrower implementation of ESFs. The thorough SOGI GPN recognizes the LGBTQI+ spectrum multiple areas where additional protection(s) are needed for transgender people; and protection against SGBV and harassment of SGMs.

	awareness programs for project workers			staff		
Sexual & Gender Minority (SGM) Targeting	<u>Adequate</u> - Includes a Non-Discrimination and Equal Opportunity Policy, which states the EIB cannot make employment decisions on the basis of sexual orientation or gender identity - Lacks additional protective mechanisms for SGMs	<u>Weak</u> - Fails to mention SGMs - Lacks protective mechanisms for SGMs	<u>Weak</u> - Fails to mention SGMs - Lacks protective mechanisms for SGMs	<u>Weak</u> - Fails to mention SGMs - Lacks protective mechanisms for SGMs	<u>Weak</u> - Fails to mention SGMs - Lacks protective mechanisms for SGMs	<u>Weak</u> - Fails to mention SGMs; lacks protective mechanisms for SGMs ¹⁶
Gendered Labor	<u>Weak</u> - Lacks labor protection for women and SGMs - Fails to mention gender in relation to hiring practices, occupational health, and safety protocols	<u>Weak</u> - Lacks labor protection for women and SGMs - Fails to mention gender in relation to hiring practices, occupational health, and safety protocols	<u>Adequate</u> - States that clients are required 'to avoid gender-based exclusion in the workplace' yet leaves this to the project level - Lacks specific gender-sensitive requirements for hiring practices, occupational health, and safety protocols	<u>Weak</u> - Lacks labor protection for women and SGMs - Fails to mention gender in relation to hiring practices, occupational health, and safety protocols	<u>Weak</u> - Lacks labor protection for women and SGMs - Fails to mention gender in relation to hiring practices, occupational health, and safety protocols	<u>Adequate</u> - States that Borrowers must 'provide appropriate measures of protection and assistance' for women project workers - Fails to mention gender in relation to hiring practices, occupational health, and safety protocols

¹⁶The World Bank SOGI Good Practice Note also incorporates guidance on preventing harm to SGMs.

Endnotes

ⁱ **ADB:** ADB's safeguard policy framework consists of three operational policies on the environment, indigenous peoples, and involuntary resettlement. These are accompanied by Operations Manual sections on Environmental Considerations in ADB Operations; Involuntary Resettlement; and Indigenous Peoples. The ADB is evaluating the effectiveness of the current SPS with plans to update it soon.

ⁱⁱ **AfDB:** AfDB has a set of Operational Safeguards (OSs) that are integrated into the Integrated Safeguard System (ISS). The Operational Safeguards are: OS 1 Environmental and Social Assessment; OS 2 Involuntary Resettlement: Land Acquisition, Population Displacement, and Compensation; OS 3: Biodiversity and Ecosystem Services; OS 4 Pollution Prevention, Control, Greenhouse Gases, Hazardous Materials, and Resource Efficiency; OS 5: Labor Conditions, Health and Safety. These are accompanied by the Integrated Environmental and Social Impact Assessment Guidance Notes (IESIA), which provide technical guidance for the Bank and its borrowers on specific methodological approaches of standards and actions relevant to meeting the requirements of the OSs. The AfDB is evaluating the effectiveness of the current ISS with plans to update it soon.

ⁱⁱⁱ **AIIB:** AIIB's Environmental and Social Policy contains three Environmental and Social Standards (ESSs), an Environmental and Social Exclusion List, Directive: Environmental and Social Procedures, and Guidance and Information Tools. The three ESSs are: ESS 1: Environmental and Social Assessment and Management; ESS 2: Involuntary Resettlement; ESS 3: Indigenous Peoples. The Bank will not knowingly finance a Project that involves activities or items specified in the Environmental and Social Exclusion List. The Directive on Environmental and Social Procedures includes mandatory procedures for implementation of the ESP and ESSs. The guidance and information tools contain non-mandatory guidance and information tools designed to explain or facilitate implementation of the Environmental and Social Framework. The AIIB is evaluating the effectiveness of the current ESF with plans to update it soon.

^{iv} **BOAD:** BOAD requires that projects submitted for funding complete the environmental and social impact assessment (ESIA). The client or promoter must establish and maintain an Environmental and Social Management System (ESMS). The ESMS contains: (i) Policy Statement; (ii) identification of risks and impacts; (iii) management program; (iv) organizational capacity and skills; (v) preparation and response to emergency situations; (vi) stakeholder engagement; and (vii) monitoring and evaluation.

^v **CDB:** CDB's Environmental and Social Review Procedures (ESRP) outlines how CDB, within its mandate and operations, ensure that environment and social risks are managed. The ESRP is divided into two components: (i) mainstreaming environmental and social considerations; and (ii) the environmental and social review requirements specific to the Bank's investment lending operations. The ESRP contains eight performance requirements (PRs), which are: (a) Pollution Prevention, Control and Management; (b) Toxic and Hazardous Substances Control and Management; (c) Physical Cultural Property; (d) Natural Habitats and Biodiversity Conservation; (e) Directly Affected Communities; (f) Vulnerable Groups; (g) Land Acquisition and Resettlement; (h) Community, Worker Health and Safety.

^{vi} **EBRD:** EBRD has adopted a comprehensive set of specific ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet. The Performance Requirements are as follows: PR 1 Assessment and Management of Environmental and Social Risks and Impacts; PR 2 Labour and Working Conditions; PR 3 Resource Efficiency and Pollution Prevention and Control; PR 4 Health, Safety and Security; PR 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement; PR 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources; PR 7 Indigenous Peoples; PR 8 Cultural Heritage; PR 9 Financial Intermediaries; PR 10 Information Disclosure and Stakeholder Engagement.

^{vii} **EIB:** The EIB Environmental and Social Standards provide an operational translation of the policies and principles contained in the 2009 EIB Statement of Environmental and Social Principles and Standards. They are grouped across the following ten thematic areas: Assessment and management of environmental and social impacts and risks; pollution prevention and abatement; biodiversity and ecosystems; climate-related standards; cultural heritage; involuntary resettlement; rights and interests of vulnerable groups; labor standards; occupational and public health, safety and security; and stakeholder engagement.

^{viii} **IDB (Public):** The IDB Policy Directives for environmental mainstreaming are defined in relation to the Bank's country strategies and programming processes; the design and execution of operations; and the Bank's corporate social responsibility. The following Policy Directives are structured under two major categories: A) environmental mainstreaming; and B) environmental safeguards. The directives are: A.1. Mainstreaming Environment in Country Programming and Strategies; A.2. Supporting Environmental and Natural Resources Management Operations; A.3. Mainstreaming Environment Across Sectors; A.4. Supporting Regional Initiatives and International Agreements; A.5. Tracking Environmental Sustainability Indicators; A.6. Assessing Environmental Risks and Opportunities; A.7. Promoting Corporate Environmental Responsibility; B.1. Bank Policies; B.2. Country Laws and Regulations; B.3. Screening and Classification; B.4. Other Risk Factors; B.5. Environmental Assessment Requirements; B.6. Consultations; B.7. Supervision and Compliance; B.8. Transboundary Impacts; B.9. Natural Habitats and Cultural Sites; B.10. Hazardous Materials; B.11. Pollution Prevention and Abatement; B.12. Project Under Construction; B.13. Non-investment lending and flexible lending instruments; B.14. Multiple Phase and Repeat Loans; B.15. Co-financing Operations; B.16. In-country Systems; B.17. Procurement. The IDB is designing a new Environmental and Social Policy Framework, which will include a new gender standard.

^{ix} **IIC (IDB Invest):** IIC's Environmental and Social Sustainability Policy (the Sustainability Policy) is organized into the following categories: IIC's Commitments; IIC's Roles and Responsibilities during Environmental and Social Appraisal and Supervision; Collaboration with Partners; Governance; Reference and Supporting Documents. Supporting Documents include: Disaster Risk Management Policy; Operational Policy on Indigenous People's Policy; Involuntary Resettlement Policy; and four sector-specific guidance documents on construction and the environment. IDB Invest is evaluating the effectiveness of the current ESSP with plans to update it soon.

^x **IFC:** IFC's Sustainability Framework includes eight Performance Standards (PS). The Performance Standards are: Risk Management; Labor; Resource Efficiency; Community; Land Resettlement; Biodiversity; Indigenous People; Cultural Heritage. The IFC is evaluating the effectiveness of the current Performance Standards with plans to update them soon.

^{xi} **NDB:** NDB's Framework sets out the core principles that govern the operations of NDB on environment and social management. It includes two parts: (i) Part 1 which provides an overarching policy for addressing environment and social management in operations, and (ii) Part 2 Environmental and Social Standards (ESS) which set forth the key mandatory requirements with respect to Environment, Involuntary Resettlement, and Indigenous Peoples.

^{xii} **WB:** World Bank's ESF consists of: the World Bank's Vision for Sustainable Development; the World Bank's Environmental and Social Policy for Investment Project Financing (IPF), which sets out the requirements that apply to the Bank; the 10 Environmental and Social Standards (ESS), which set out the requirements that apply to Borrowers; Bank Directive: Environmental and Social Directive for Investment Project Financing; Bank Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups. The 10 ESSs are: ESS1 Assessment and Management of Environmental and Social Risks and Impacts; ESS2 Labor and Working Conditions; ESS3 Resource Efficiency and Pollution Prevention and Management; ESS4: Community Health and Safety; ESS5: Land

Acquisition, Restrictions on Land Use and Involuntary Resettlement; ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources; ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities; ESS8: Cultural Heritage; ESS9: Financial Intermediaries; ESS10: Stakeholder Engagement and Information Disclosure.