



**IDA19**

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**Comments Received from the Public Posting  
of the IDA19 Draft Deputies' Report**

**November 2019**

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# 1. Bank Information Center



## BIC Comments on IDA19 Draft Deputies Report

The IDA Draft Deputies Report reflects important progress on the draft policy commitments and indicators that were made public earlier this year. We are pleased that the level of ambition has increased for some of the indicators that we flagged earlier in this process. However, we believe that for several indicators and policy commitments, more is needed, and there remain important gaps that should be addressed before the draft is finalized. Below are a few areas in which we see a need for further strengthening of the draft to ensure that IDA19 truly espouses the overarching theme of “Ten Years to 2030,” and the urgency with which that goal must be approached.

### *Disability*

For disability to truly be a cross-cutting issue, there must be specific policy commitments within each of the five special themes that address the specific impact of each theme on persons with disabilities. Unfortunately, disability is still missing from the Gender and Development as well as the Climate Change special themes. Unless persons with disabilities are explicitly referenced in the policy commitments or the policy commitments take a more comprehensive, inclusive approach to address the needs of persons with disabilities, they will continue to be overlooked and will not be able to benefit from and could be potentially harmed by Bank projects. This could be addressed in the draft agreement, by adding disability to existing commitments. For example, the Gender special theme includes a commitment to support at least 5 IDA countries to invest in gender-based violence (GBV) prevention and response, including “delivering safe, quality, inclusive health care and other services through health systems.” Adding “mental health” here would be an important way to make sure such systems were truly inclusive and address the needs of persons with disabilities and would serve to highlight what “other services through health systems” could actually mean.

Under the Climate Change special theme, the commitment to support 25 countries to reduce the risks of climate shocks by supporting Adaptive Social Protection programs should also explicitly mention persons with disabilities, in order to ensure this often marginalized community does not fall through the cracks. Both of these changes could be made through adjusting existing commitments, rather than creating new ones. We have suggested the following language (in bold) below be added accordingly:

### *Gender*

6. Support at least five IDA countries to invest in GBV prevention and response, delivering safe, quality, inclusive health and **mental health** care and other services through health systems, and five countries to implement GBV prevention and response protocols as part of safe and inclusive schools.

### *Climate*

4. Support at least 25 IDA countries to reduce the risks of climate shocks on poverty and human capital outcomes, **particularly for the most marginalized including persons with disabilities**, by supporting

programs that incorporate Adaptive Social Protection (ASP) into national systems or reduce climate threats to health.

### ***Citizen engagement***

We welcome the continued commitment of IDA to ensuring projects have beneficiary feedback indicators at design, and that the Tier 3 indicator measuring beneficiary feedback is disaggregated by FCS. However, after two IDA replenishment cycles, almost 100% of projects have achieved this target. We agree with the narrative under the Governance and Institutions heading about the need for citizen engagement in IDA projects to be both “broadened and deepened with concrete steps,” and therefore strongly urge the IDA19 RMS to focus on the *implementation* of project indicators, rather than continuing to only focus on the existence of indicators at design. The beneficiary feedback indicator should be edited to reflect a focus on implementation, and the target for projects implementing beneficiary feedback in implementation should be set to at least 75%.

### ***Climate***

We welcome the addition of a policy commitment to support IDA countries to implement their National Biodiversity Strategies and Action Plans. That said, we think more ambition and specificity is needed around this important theme. For example, the Tier 1 indicator, "Marine protected areas (% of protected areas)" is too vague, and possibly counterproductive, since marine protected areas could be increased by decreasing terrestrial protected areas. To make this more specific, one of the following changes should be made (in bold):

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

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

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## 2. Bretton Woods Project UK

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Firstly, in future it would be beneficial for IDA to hold this public consultation earlier in the replenishment process. It's my understanding from speaking to both IDA donor government representatives and World Bank staff that the policy proposals outlined in the 'draft' Deputies Report are more or less final, meaning that this consultation process will likely have little influence on the final outcome beyond perhaps small tweaks to specific policy commitments. Engagement with civil society stakeholders is an area where IDA should seek to improve in the future, by scheduling this earlier in the replenishment process, so that public consultation doesn't have the appearance of a box-ticking exercise (i.e. occurring when the proposed policy package is nearly fully baked).

Beyond this, and for reasons of space, I will limit my comments to two main 'asks' on the proposed climate change policy commitments outlined in the draft Deputies Report:

1. Page 46 of the Draft Deputies Report notes, 'IDA will actively engage at a policy level and foster development policy financing (DPF) operations to support climate-informed policies and reforms at the sectoral level, where appropriate. Prior actions which address climate policy issues will be embedded more into DPFs, and in cases where the country wishes to focus policy reforms solely on climate change, green growth or climate change DPFs can be developed, where all prior actions will address climate change. DPFs could, for example, include support for fossil fuel subsidy reforms, agriculture subsidy reforms, environmental tax reforms, water pricing, and priority policies in climate-related action plans, including NDCs.' However, in some cases World Bank DPFs support 'business as usual' extractivist forms of development (as DPFs in recent years in Guyana, Egypt, Mozambique, Indonesia & Peru demonstrate). Such support for fossil fuel development is inconsistent with efforts to keep global warming below 1.5°C, and flies in the face of the urgent need to shift to pro-poor, low-carbon development, as mandated by the Paris Climate Agreement. To address this issue, IDA19 should introduce an exclusion preventing DPFs from supporting the expansion of fossil fuels production in IDA countries, by adding coal, oil, and natural gas to the Excluded Expenditures of World Bank Development Policy Finance in IDA member countries. The following language should be added to all Development Policy Finance legal agreements: The Recipient undertakes that the proceeds of the Financing shall not be used to finance Excluded Expenditures ("Excluded Expenditure" means any expenditure: for goods or services intended for coal, oil, or natural gas power plants, exploration, extraction, and/or transport).

2. Page 47 of the Draft Deputies Report notes IDA19 will, 'Develop new resilience metrics designed to give increased incentives for more effective climate adaptation actions, including through enhanced disaster resilience of infrastructure developments, and pilot them in 20 IDA operations.' IDA should add additional language on the need to consult project-affected communities, including women and girls, as part of assessing the 'resilience' of IDA projects to be added to this policy commitment, and the World Bank should open up the pilot version of its resilience rating metrics to public consultation, so that CSOs and academic experts can provide feedback on the ranking's development. This is necessary in order to ensure that the Bank's resilience metrics are well aligned with enhancing the resilience of people on the ground,

in addition to meeting the needs of governments and private-sector investors. This is a potential gap in the metrics the Bank is devising, as it does not have a track record of assessing the systemic resilience of its projects on wider locations and systems. If this policy commitment is to deliver the desired benefits to IDA countries, a robust consultative process will be required.

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### 3. Global Poverty Solutions, Canada

**From:** Jean-Francois Tardif <tardifsanchez@gmail.com>

**Sent:** Tuesday, November 19, 2019 12:12 AM

**To:** Civil Society <civilsociety@worldbank.org>

**Subject:** Consultations on IDA 19 Deputies Report

Good Evening:

I was trying to provide feedback on the IDA 19 Deputies Report earlier this evening and playing with sentences to fit the maximum allowed number of words when the system told me, without warning that the deadline had passed at 11:30 pm.

Could you please include my feedback? (below). My name is Jean-Francois Tardif and I am the National Coordinator of an NGO in Canada, Global Poverty Solutions. I sent this feedback to the general email box of the World Bank half an hour ago, but, I found this account since, which seems more appropriate.

As part of the Africa Human Capital Plan (AHCP), the World Bank has committed to increasing education and health investments on that continent by 50%, reducing under-five mortality by 40%, reducing open defecation by one third, and increasing social protection coverage for the poorest quintile by 50%. All of the foregoing is to be achieved within 4 years, which will make it the fastest advance in human development in history! It is therefore extremely hard to understand how the Africa Human Capital Plan is not even mentioned once in the IDA Deputies' Report. Just as importantly, the quantitative goals of the Plan are absent from the proposed IDA Results Management System. Should this silence be construed as the Deputies' intention to focus efforts elsewhere? Let's hope not, otherwise our organization would not be able to support a Canadian contribution to IDA, when Canadian aid is very limited and must be concentrated on human capital priorities.

Recommendation 1: Mention the Africa Human Capital Plan by name, with its quantitative, time-bound goals, as a key commitment for IDA19. This is quite compatible with the rest of the current general orientations of IDA19. The mention should also come with an acknowledgement that the AHCP will require, for participating countries, nearly half of their IDA allocation.

Recommendation 2: The World Bank has, unfortunately, a tendency to make important commitments in the area of human development and not follow up publicly on them. For instance, the \$600 million promised at the Nutrition for Growth Summit in 2013, and \$1.7 B at the Milan Global Nutrition Summit of 2017, and \$2 billion at the 2017 G7 have not been tracked. Consequently, IDA should report on an annual basis on the funding allocated to the AHCP.

Recommendation 3: Adjusting the Results Management System (RMS) so it reflects the priorities of the AHCP. a) Under-Five Mortality and Stunting: These indicators are currently under Tier 1 (i.e. contextual indicators, not addressed by Bank programming); they should be moved to Tier 2 as they are direct operational indicators of success in the Africa Human Capital Plan; b) The Africa Human Capital Plan targets beneficiaries in the bottom quintile, not all beneficiaries like the RMS (beneficiaries tend not to be the poorest); and c) Women and Children who have received basic nutrition service should be tracked separately to assess potential impact on child stunting, a goal of AHCP .

Recommendation 4: Revisit the Results Management System's "Expected Range/Value for IDA 19" column to factor in the goals of Africa Human Capital Plan. The RMS appended to Deputies' Report talks about providing 15-20 million people (Expected Range) with improved access to sanitation. The African Human Capital Plan targets a decrease of the open defecation rate from 22.9 % of the population to 15% of the population. Applying these percentages to the 60% of the African population covered by the Human Capital Plan leads to a gain in access to sanitation at least three times higher than the one projected by the RMS. How can this lack of ambition in the RMS be explained? As the access to sanitation indicator shows, the goals of the RMS appear to not have taken into account those of the Africa Human Capital Plan. It would be advisable, as a good planning exercise to revisit other Tier 2 goals in light of the African Human Capital Plan: for instance if under-five mortality is to be reduced by 40% in Africa, it would be useful to calculate what the target should be for the number of deliveries attended by skilled personnel should be.

Thank you for the opportunity to comment on the IDA Deputies' Report.

[Jean-Francois Tardif](#)

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## 4. International Development Research Centre, Canada

**From:** Federico Burone <FBurone@idrc.ca>

**Sent:** Tuesday, November 19, 2019 5:42 AM

**To:** Nancy Clifford <nclifford@worldbankgroup.org>

**Cc:** jlebel@idrc.ca; mgorman@idrc.ca; Genevieve Gagnon <ggagnon@idrc.ca>

**Subject:** IDA Deputies report on the IDA19 Replenishment - now available for public comment

Dear Nancy,

On behalf of Jean Lebel, the President of the International Development Research Centre (IDRC), I would like to thank you for sharing a link to the Deputies' Report on the 19<sup>th</sup> IDA Replenishment.

My compliments to the Deputies for the work they have done over the past year to assemble such a comprehensive package of ideas and approaches to address many of the complex development challenges faced by Low-Income Countries.

While we don't have specific comments on the Report, I did want to signal that for the past year and a half, IDRC has been in the process of developing our own 2020-2030 strategy. Like IDA, we are building on the strengths and lessons from our current strategy, while also taking on new directions in our future

strategy. Like you, we are thinking of global challenges like climate change, migration, inequality, fragility, violence and conflict, technological disruption and the future of work, gender equality. And like IDA, we are thinking about how we can take a comprehensive approach to addressing complex challenges. More specifically, given our niche, where can we support research in Low and Lower-Middle Income Countries in the Global South that both helps identify context-specific and policy-relevant solutions and innovations, and strengthens southern leadership and capacity. The themes, cross-cutting issues, country and regional approaches, and programmatic packages in IDA 19 resonated a lot with our thinking. They are useful food for thought as we conclude the development of our strategy and strike a path towards setting our own programmatic directions.

Perhaps in early Spring – once our strategy has been adopted, and IDA 19 is about to get underway – we can share the final strategy, and organize a phone call to discuss where our respective approaches have settled. Given the number of elements in common, perhaps at that time we can explore how to better connect our respective work plans.

All the best,

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## 5. International Rescue Committee

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The World Bank's financing for refugee responses has been some of the most consequential financing to hit the aid system in recent history, and the International Rescue Committee (IRC) fully supports the renewal of the IDA Window for Host Communities and Refugees (WHR). We are encouraged to see that the IDA Deputies Report reflects lessons learned, especially from the IDA18 Refugee Sub-Window (RSW), and calls for a number of critical adjustments to ensure the WHR meets the longer term needs of refugees and hosts. However, there remain a few areas where the World Bank could go even further to ensure WHR financing and programs have a positive impact on beneficiaries. The IRC welcomes the newly introduced systematic review of refugee policy and institutional environments in countries eligible for the WHR to identify and track progress against policy reform opportunities. This is a clear value-add, as demonstrated by refugee-specific financing that has supported policy reforms in Ethiopia, Jordan and elsewhere. Partnering with UNHCR on the methodology of the assessment is a good first step, and we encourage the World Bank to incorporate the views of beneficiaries and NGOs who work closely with refugee and host community populations as well. We urge the World Bank to ensure the review and

recommendations are made public, as transparency will encourage accountability for policy reform commitments. In addition, we are encouraged by the acknowledgement that the Bank will need to partner with other multilateral development banks, UN agencies and NGOs.

The World Bank's collaboration on Risk and Resilience Assessments, steering group in Cameroon, and coordination with UNHCR are all promising exercises. We agree with the IDA Deputies that the World Bank needs to provide more support to establish and strengthen multistakeholder platforms that include women and vulnerable groups—particularly refugees—in policy making and project implementation. Through IDA19, the World Bank should incorporate multistakeholder engagement in project cycle design and introduce a formal structure at the country level to support consultation, coordination and joint planning and analysis with development and humanitarian partners. The IDA19 framework should also expand its exceptional basis for direct financing to non-governmental actors to be an option in refugee contexts, where bank programs could benefit from the unique access, geography, knowledge and impartiality of NGO partners.

We are pleased that the World Bank will invest in reducing gaps in core data to support evidenced-based policy making. One of the World Bank's comparative advantages is its expertise in data collection and analysis; however, refugees are typically left out of the types of data collection that the World Bank supports, such as household surveys. IRC analysis of national SDG progress reports, which largely draw on household survey data, found that refugees are typically excluded; yet, refugees are critical to achieving the SDGs and the Bank's goals to reduce poverty and increase prosperity.

The World Bank should commit to helping host governments include refugees in their national and subnational development plans and reporting on SDG indicators (i.e. Voluntary National Reviews). The Joint Data Center with UNHCR should support these efforts. In addition to the WHR eligibility criteria already identified, the IRC proposes the following additional terms for WHR-funded projects:

1. A commitment by the government to include refugees in national development plans and in Voluntary National Reviews of progress towards the SDGs;
  2. Description of the proposed project objectives, including outcome-level objectives for both refugees and host communities, and indicators that are disaggregated by age, sex, and status; and
  3. A strategy for consultation, coordination and joint planning and analysis with other development and humanitarian partners (UN agencies, CSOs), and with beneficiaries
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## **6. Pathfinders for Peaceful, Just and Inclusive Societies, NYU-CIC**

### **Comments on the draft IDA19 Deputies' Report**

#### **From the secretariat of the Pathfinders for Peaceful, Just and Inclusive Societies, NYU-CIC**

The draft IDA19 Deputies' Report, indicates that IDA19 aims to accelerate progress toward the World Bank Group Twin Goals and the Sustainable Development Goals (SDGs). These comments focus specifically on SDG16 and the political leadership of a diverse set of countries that are working together to implement this goal.

The Pathfinders for Peaceful, Just and Inclusive Societies is a group of countries, international organizations, global partnerships, civil society, and the private sector, that work to accelerate the delivery of the SDG targets for peace, justice and inclusion (SDG16+). Pathfinders is hosted by the NYU Center on International Cooperation.

In July 2019, the Pathfinders adopted a joint statement on SDG16+ and presented the Justice for All report. Both documents can provide critical information on the international consensus that is emerging on how to accelerate progress on SDG16 and the agenda for action that the Pathfinders' Task Force on Justice has set that will help deliver the SDG targets that promise justice for all.

#### **Joint statement on SDG16+**

Thirty-seven governments agreed on a joint statement on SDG16+, that was presented in July 2019 at the High-Level Political Forum on Sustainable Development. Its key message was the need for accelerated action to:

- Significantly reduce all forms of violence everywhere, with the aim of halving global violence.
- Shift from a world where justice is only available to the privileged few, to one that protects human rights and provides justice for all.
- Transform institutions so that they can meet the aspirations of people and underpin the ambitions of the 2030 Agenda.
- Tackle inequality and exclusion so that all people have a stake in a fairer and more sustainable future.

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

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

The full text is available here:

[https://static.wixstatic.com/ugd/6c192f\\_9736e99ac2a14b168039311b7e0ff4d3.pdf](https://static.wixstatic.com/ugd/6c192f_9736e99ac2a14b168039311b7e0ff4d3.pdf)

## **Justice for All report**

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

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

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

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

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

## **Recommendations**

On behalf of the Pathfinders for Peaceful, Just and Inclusive Societies, we urge the drafters of the IDA19 Deputies' Report to use the data, costing and evidence of the Justice for All report to highlight the critical importance of providing justice for all for the creation of jobs and economic transformation, for the achievement of gender equality, for the prevention of fragility, violence and conflict and to improve governance and institutions. As such, IDA19 should include concrete measures to invest in people-centered justice systems that are focused on solving and preventing people's justice problems and enabling them to participate fully in their economy and society. We also urge the drafters to acknowledge the political leadership on SDG16+ and incorporate the key messages of the Joint Statement.

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## 7. OXFAM



### **Oxfam Comments on the 2<sup>nd</sup> IDA19 Proposed Policy Package November 2019**

Oxfam welcomes the latest draft of the IDA19 policy package following the IDA Deputies meeting in October 2019 in Washington DC. We have been developing inputs on the policy package for several months with [our original submission](#) made in May 2019 followed by [our comments](#) on the first publicly available draft of the policy commitments in the summer. After reviewing this latest draft, we commend the World Bank and its donors for the newly added commitments, particularly on biodiversity and women's land rights, and the increased ambition on various issues, including mainstreaming national climate action plans and renewable energy. As the IDA19 replenishment process is approaching its end, we urge the World Bank and its donors to pay attention to improving the following areas in the policy package:

1. EDUCATION: Prohibit funding to for-profit schools through the Private Sector Window and support countries to increase education and health financing
  - a. *Committing to public, free, quality education for all*

The role of the World Bank in supporting IDA countries to improve their public education provision cannot be over emphasized. However, the Bank has also actively advised and funded governments to expand the role of the private sector in education provision, including public-private partnerships, and the International Finance Corporation (IFC) continues to invest in for-profit school chains. This is cause for alarm given the impact of market-oriented provision of education services, particularly through low fee and for-profit private schools, including reinforcement of inequalities by disproportionately excluding and marginalizing students from the lowest income households and girls. Oxfam recommends the addition of language in the narrative stating:

- *The World Bank commits to support countries to provide free and universal quality public education under IDA19. All primary and secondary education projects will support public provision of education.*
- *All TA/ASA for education shall be oriented towards strengthening public education provision, including to address gender disparities and other forms of exclusion.*
- *Due to serious concerns in commercial education, notably inequality and gender exclusion, the International Financial Corporation (IFC) will refrain from investing IDA funds in for-profit primary and secondary education providers through the Private Sector Window.*

- b. *Increasing human capital financing*

The amendment of the IDA19 commitment in the Governance and Institutions special theme to focus on improving “*sustainability of human capital financing*” targeting education and health outcomes is an important addition. However, it remains an insufficient initiative without a parallel commitment to increase the resources available for public education and health in IDA countries. Oxfam recommends the following amendment of this commitment (underlined), to also be reflected in the corresponding RMS indicator:

- Support 15 IDA countries with the lowest Human Capital Index to sustainably increase human capital financing, including a focus on reaching universal health coverage and good learning outcomes for all, through: (i) improving the efficiency of public expenditures, and ii) more effectively aligning expenditures with domestic financing and external resources in a sustainable manner.
- Add a corresponding RMS indicator: percentage increase of national budget expenditure for education and health respectively

## 2. DOMESTIC RESOURCE MOBILIZATION: Measuring redistributive impacts

### a. *Measuring Equity in DRM programs*

The commitment to strengthen domestic resource mobilization (DRM) in IDA countries is welcomed. The emphasis on addressing “the equity impacts of taxes and spending” and on supporting countries “to collect not only more, but better tax revenues” is applauded. However, the success of DRM programs in IDA countries should be measured by indicators that reflect both aspects: “collecting more” (higher tax revenues) and “collecting better” (equitable tax systems). The proposed RMS indicator only captures the former and fails to measure any equity impacts. Oxfam recommends the following:

- The World Bank is the proposed custodian for the newly recommended SDG 10.4.2 indicator on the ‘*redistributive impact of fiscal policies*’<sup>1</sup> and will hence be responsible for ensuring systematic collection of data on redistributive impacts of taxes and transfers in all IDA countries. Thus, we propose including the tax component of SDG10.4.2 indicator into the RMS indicator for the DRM policy commitment: “number of IDA countries that improve redistributive impact of tax policies”
- **Amendment to last sentence of DRM narrative:** “This will be done through partnerships and regional and bilateral support, such as the Addis Tax Initiative (ATI) and through the Platform for Collaboration on Tax together with the IMF, the United Nations (UN) and the Organization for Economic Co-operation and Development (OECD).”

## 3. CLIMATE CHANGE: Measuring accessibility of energy generated

### a. *Disaggregating by grid-type*

We commend the World Bank’s commitment to support the generation, integration, and enabling infrastructure for at least of ten gigawatts (GW) of renewable energy in IDA countries. Oxfam recommends

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<sup>1</sup> recommended by UN IAEG in October 2019 for decision by UN Statistical Commission in March 2020

disaggregating the data on gigawatts produced by type of energy hence the following amendment of the RMS indicator:

- Generation capacity of sustainable renewable energy (GW)  
**This indicator should be disaggregated by on-grid, off-grid and distributed renewable energy**

*b. Ensuring accessibility of energy generated*

Secondly, whereas the commitment aims to “facilitate further penetration of renewable energy access in IDA countries,” the policy package is silent on clear targets for improving and measuring access to energy at a household level. The Jobs and Economic Transformation theme includes a tier 2 indicator for electricity access: “**People provided with new or improved electricity service (millions).**” **Oxfam recommends that:**

(ii) **A similar RMS indicator should be included in the Climate Change theme** and modified as follows:

- *People provided with new or improved affordable, reliable electricity service via renewable energy (million)*

***This indicator should be disaggregated by:***

- *New vs. improved electricity service; and*
- *Household income level*

(iii) **The RMS indicator on the Jobs and Economic Transformation theme, which has an impact on energy access, should be amended as follows:**

- *People provided with new or improved affordable, reliable electricity service (million)*

***The indicator should be disaggregated by:***

- *New vs. improved electricity service;*
  - *Technologies used; and*
  - *Household income level*
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## 8. Results Canada

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### Recommendation 1:

IDA should maintain a continued commitment to the Human Capital Project. It is good to see within the Deputies Report an acknowledgement of the widely accepted principle that prioritizing investments in human capital through health, nutrition and education interventions contributes to sustainable growth and poverty reduction. Over the past few years IDA and the World Bank Group's investments in the Human Capital Project have been critical in the fight against extreme poverty and creating sustainable growth around the world. However, in IDA 19 there needs to be a recommitment to the Human Capital Project. In order to show a continued commitment to the Human Capital Project, IDA should outline how it plans on connecting the Human Capital Project to the thematic areas of the IDA 19 replenishment, and specifically how it plans to address issues regarding health, nutrition, education and early childhood development. Additionally the Bank should confirm this commitment by building on the African Human Capital Plan in particular, which committed to increasing World Bank financing for human capital projects in Africa by 50% from 2021-2023, as well as to increasing financing operations for human capital projects by 50% in IDA 19 overall. The success of the African Human Capital Plan is particularly important as we know that global poverty will be increasingly concentrated in the region.

### Recommendation 2:

There needs to be more publicly available data on the indicators of the Human Capital Index. The Human Capital Index is the best available option we have for measuring the impacts of the Human Capital Project, and it serves as a useful indicator of recipient country performance levels on the key areas of health, nutrition, education and early childhood development. This is why it was good to see improvements being made to the index, in particular the inclusion of new indicators such as stunting. However, there remains an issue of transparency, as the baseline data being established in the index is not publicly available. This data will be an important asset to country governments, civil society actors, researchers and others needing to build out a better understanding of the effectiveness of IDA programming. In the final Deputies Report it would be great to see a commitment that makes this essential data publicly available.

### Recommendation 3:

IDA needs to ensure that its transition policy is coordinated with other major multilateral donors. As more countries see sustained levels of economic growth that makes them ineligible for IDA support there is an increasing need for IDA to ensure that this transition does not impact the sustainability of country growth. While a commitment to ensuring that countries have access to the financing they need through the transition process is welcome, there is still an overall coordination gap between IDA and other major multilateral donors. This is particularly important given the fact that various multilaterals use the same economic criteria to decide when a country is ready to transition, meaning that governments are facing a decrease in funding levels from a variety of sources. IDA 19 must mitigate the risks of simultaneous transition through comprehensive, cross-mechanism planning. This includes working closely with the

Global Fund to Fight AIDS, Tuberculosis and Malaria, The Gavi, Vaccine Alliance and the Global Financing Facility to ensure transition policies are coherent and complementary.

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## 9. Results Korea

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Republic of Korea

In April of this year, the World Bank launched what is probably the most ambitious action plan ever adopted by the international community, the Africa Human Capital Plan.[1] In it, the Bank notes that if Africa could increase its human capital, its GDP would be multiplied by 2.5!| In this Plan, the Bank has put forward ground-breaking targets for Africa to be reached in four years in the areas of under-five mortality reduction, access to sanitation and stunting (low height per age) reduction.

Needless to say, the Bank calculates that IDA resources dedicated to human capital will have to be increased by 50% for African countries. In fact, the targets of IDA 19 do not track the objectives of the Africa Human Capital Plan, and some of the targets of IDA 19 are way below the Africa Human Capital Plan: for instance, IDA 19 talks about providing 15-20 million people with improves access to sanitation whereas the African Human Capital Plan targets 7.9 % of the population, i.e. 60 million people! It is as though the right arm ignores what the left arm is doing at the World Bann!

The Africa Human Capital Plan needs to become one of the central transformative priorities of IDA. We need to insist that fulfilling on the Africa Human Capital Plan and its specific targets figure prominently in IDA 19. In addition, we need to ensure: - That a report is issued every year on how much IDA19 funding is dedicated to funding of human capital initiatives in Africa - That the Results Management System of IDA19 is aligned with the goals of the Africa Human Capital Plan (for instance, the current proposal is to measure number of children and mothers receiving health and nutrition treatment, but if we want to reduce child mortality and child stunting, we need to count separately the number of children; similarly, the current proposal calls for measuring the number of beneficiaries of social protection programs, while the African Human Capital Plan calls for measuring the number of beneficiaries from the lowest quintile, an important detail when most beneficiaries tend to be from quintiles other than the poorest one) - The goals of the Results Management System of IDA need to be aligned with the goals of the Africa Human Capital Plan.

[1] <http://pubdocs.worldbank.org/en/562231555089594602/HCP-Africa-Plan.pdf>

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## 10. Save the Children UK

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Save the Children

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Thanks very much for the opportunity to provide feedback to the Draft IDA19 deputies report. We'll share our full submission with Aki Nishio's office directly.

This submission sets out Save the Children's response to Draft of IDA19 Deputies' Report on IDA 19's strategic priorities.

Save the Children recommends three game-changing priorities for IDA19.

1. Focus on equity as the number one priority across the IDA19 portfolio Agenda 2030 and the Twin Goals will not be achieved unless we see accelerated action for the furthest behind. IDA19 needs to make equity its number one priority for all its themes, to drive convergence in development outcomes between the poorest groups and their more advantaged peers. In regards to policy design this means reducing inequalities in outcomes across all IDA themes, placing emphasis on tackling persistent discrimination linked to gender and disability (which is a very welcome focus), and disaggregating data by groups. Equitable resource allocation requires prioritising resources to the most deprived and marginalised groups, and those regions where need is highest. The key indicator of success for IDA19 should be that: (1) it is increasingly tackling inequity in national budget allocations, and (2) generating outcomes to drive convergence in line with the pledge to Leave No One Behind.

2. Building human capital in the most difficult places: step up efforts on refugee education Building human capital is critical for development: it is the foundation for generational change: The values, skills and capabilities that we engender in today's generation of children will dictate the development pathways of nations. Failure to put in place the human capital foundations will have consequences for generations. IDA19 needs to increase focus on the most deprived and marginalised children within its human capital project; and prioritise building human capital in the most difficult places. The Bank's initiative to tackle learning poverty is already very welcome. By leading the way on agreeing and financing education for the world's refugee children, the World Bank can now make a major contribution to avoid losing the generation of more than 3.7 million refugee children that are currently not in school.

3. Prioritise children's rights and protection in action on Fragility, Conflict and Violence It is encouraging to see a strong and continuous focus on Fragility, Conflict and Violence in IDA19; the emphasis on tackling gender-based violence is particularly very welcome. The Bank should build on this by placing greater emphasis on children, and ensuring their rights and their protection in the most difficult places. For the overall FCV theme this means increasing focus on protecting children in fragile and conflict affected states; for activities on gender-based violence it requires increasing the focus on girls. More than 420 million children are currently living in conflict zones, and the number of grave violations of rights - including killing, sexual violence and recruitment as soldiers – committed against children has increased by 174%. Often they will carry the effects of trauma into adulthood, limiting their ability to bring generational change. Girls are at particular risk – child marriage for instance is one major factor of early school leaving, increases

the risk of violence, and limits a society's ability to grow the economy. The Bank should therefore strengthen the focus on children in its action on FCV and GBV, and work with others, using its global leadership and convening power to secure action.

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## 11. Sight Savers

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We welcome the recognition that investing in people with disabilities is central to IDA and how all investment operations will screen risks and opportunities for people with disabilities, in line with the ESF and WBG's ten commitments on disability.

JET - We welcome JET policy commitments 7 and 8, and the inclusion of disability disaggregated data in commitment 12. We recommend the JET theme should: ensure disability inclusion is embedded into analytical tools including the SCDs and CPSDs which the report recognises will underpin the theme; ensure inclusion, gender and disability are considered in initiatives in Pillar 1 as well as Pillar 2; adapt commitment 1 by adding 'inclusive' to economic transformation' and a footnote that explains this includes people with disabilities, women and other marginalised groups.

Gender and Development - We are concerned that women and girls with disabilities are not included in Gender and development commitments. The Report recognises that women and girls with disabilities experience disproportionate barriers (Para.57), and that the theme should strengthen the resilience of women and girls with disabilities who are often the most marginalised. As drafted, policy commitments do not reflect the importance of this issue. Without explicit reference to women and girls with disabilities within policy commitments there is significant risk they will be excluded in IDA19 implementation.

FCV - We are pleased the FCV theme recognises people with disabilities face increased risk in fragile and conflict settings. We welcome recommendations to scale up human development investment and the need to focus on addressing differential constraints and the inclusion of disability in policy commitment 3.

Climate change - We recommend replicating the narrative on disability and FCV (Para.107 & 112) in the Climate Change theme (Para.96) which currently fails to connect the importance of an inclusive approach to building resilience. Governance and Institutions - We welcome the inclusion of disability in Governance and Institutions policy commitment 12. Supporting institutions to build capacity on disaggregating by disability will be crucial to embed disability. We also recommend adapting commitment 4 to recognise the need to strengthen infrastructure governance to support inclusive infrastructure and the embedding of the principles of universal design, and adapting commitment 10 to include people with disabilities, in addition to women - without an explicit reference, and instead mentioning vulnerable groups, there is a risk that people with disabilities will be excluded and any specific needs not considered.

RMS - We welcome the inclusion of an indicator on disability in the RMS, this is a crucial step-forward for ensuring disability is cross-cutting. Universal access is vital, however it is not sufficient to measure progress across all themes. We recommend adding further disability specific indicators and disaggregating some indicators across tiers:

Tier 1: Add a column for disaggregation by disability and disaggregate a number of indicators. Focus on indicators which will be disaggregated by sex and are being collected for the SDGs. We suggest adding an indicator on the number of IDA countries integrating the Washington Group Questions or Model Disability Survey into national censuses or surveys. This would be easily measured and measure progress in IDA countries.

Tier 2: Number of IDA countries provided with statistical support by the WBG for the collection of data on disability; Disaggregate Indicator 6 – Beneficiaries in IDA countries of job-focused interventions (million) by disability in order to mirror the commitment made in the JET policy commitment.

Tier 3: Percentage of IDA-supported projects with disability inclusive beneficiary feedback indicator at design; Percentage of IDA-supported projects reporting disability inclusion in project objectives.

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## 12. TCX Investment Management Company

**From:** Harald Hirschhofer <h.hirschhofer@tcxfund.com>

**Sent:** Monday, November 18, 2019 6:10 AM

**To:** Federica Dal Bono <fdalbono@worldbank.org>

**Cc:** Ruurd Brouwer <r.brouwer@tcxfund.com>; Isabelle Lessedjina <i.lessedjina@tcxfund.com>

**Subject:** TCX comments to IDA 19 Deputies Report

Dear Federica,

**I tried to submit today the TCX comments on the IDA 19 Deputies report, but the website was down.** I will continue to try, but would appreciate if you could meanwhile receive our comments via this email. Today is the last day of submission.

TCX would like to make the following 4 points:

- Although the report stresses the importance of debt sustainability and resilience, it largely ignores currency risk and its contributions to explosive debt growth in case of sharp depreciations. We propose that the report should reflect the discussions on currency risk which have had occurred on various levels within and outside of IDA as they are of relevance for IDA 19 and future rounds. A significant number of IDA Deputies support exploring a pilot program of IDA loans denominated in local currencies, because increasing the share of external financing denominated in domestic currency will strengthen resilience AND also is an important step towards more debt and risk transparency.

- We welcome that the report reconfirms IDA's commitment to the principle of additionality (para 176). This is important to avoid duplicating efforts, reducing possibilities to fully exploit economies of scale in existing instruments, and crowding out markets. Good progress was made in formulating a waterfall approach to assess additionality. Moreover, in this context, for completeness sake, the report should mention that TCX is already offering long-term (20y+) currency risk hedging solutions at market/risk reflective prices in almost all IDA currencies and expressed interest of working with IDA to deliver financing denominated in local currencies.
- We propose more flexibility to support programmatic interventions by IDA (Para 141 and summary): Some INSTRUMENTS which are built on GLOBAL risk diversification are very likely to have MORE than 20 percent of total investments outside of IDA PSW eligible countries. However, a cooperation with such program and the participation in a global risk pool would make financial and economic sense for IDA. We thus suggest to foresee the possibility creating a carve-out for such type of programmatic investments.
- Capacity building efforts in debt management are very important. We propose to add specificity by highlighting the need to build currency risk stress-testing and management capacities in national debt management offices/treasuries as well as training its officials about the use of standard hedging instruments and their legal and contractual framework.

Thank you for giving us the opportunity to comment on this well written report.

Harald

**Harald Hirschhofer**

Senior Advisor - TCX Investment Management Company

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### 13. Tearfund, CAFOD and Bretton Woods Project

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Tearfund, CAFOD and Bretton Woods Project

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United Kingdom

We are writing with respect to the climate policy commitments for IDA19. We were pleased to note that the revised climate change policy commitments, under the pillar 'Facilitate Economic Transformation through Low-Carbon and Resilient Transition', now include a number of more explicit references to energy access, relative to earlier drafts.

As noted on pp. 47-48 of the Draft Deputies' Report, IDA19 will seek to increase battery storage and renewable energy generation and integration. However, we are concerned that the Draft Deputies' Report lacks sufficient indicators to account for and track the extent to which off-grid and mini-grid sources contribute to this IDA commitment; this is important, as the commitment's sole targets are on additional generation and battery storage capacity, which in itself does not translate into new or improved energy access. The only RMS indicator related to energy access included in the Draft Deputies' Report is, 'People provided with new or improved electricity service (million)' (see Table A1.2.b, p. 98). It is crucial for making progress on SDG7 to move towards more impact-focussed indicators that track levels of service received by end users - in terms of reliability, affordability and sustainability, particularly in 'high-impact countries' (HICs) identified by World Bank ESMAP, where energy access rates are lowest.

We recommend that the draft RMS indicator be revised from: "People provided with new or improved electricity service (million)" to the following: "People [in HICs] provided with an affordable, reliable and sustainable electricity service (million)" We also advocate that additional RMS indicators are added for IDA19: "People [in HICs] provided with affordable, reliable and sustainable clean cooking solutions (million)" "Amount of investment in distributed renewable solutions (including off-grid and mini-grid)" We feel these indicators are necessary to more clearly demonstrate IDA19's impact on meeting SDG7. Affordability and reliability of electricity services are vital to improve energy access of the poorest and in order to reach energy for all goals in the next ten years.

The poorest 40 per cent of households, or over 400 million people, residing in access-deficit countries - the majority of which are IDA members - cannot afford an electricity connection, as it costs more than one month's income. Moreover, households in one out of three access-deficit countries do not have a reliable electricity supply, as they face more than one weekly disruption that lasts over four minutes on average (Tracking SDG7: The Energy Progress Report, 2019, World Bank Group).

It is essential to measure the amount of investment going to distributed renewable energy investments sources (i.e. off-grid and mini-grid projects), as these solutions are most likely to deliver energy access for "last mile" groups in remote areas, according to research co-produced by the World Bank. There is also an urgent need for this finance: Only 3 per cent of total global finance commitments for residential electricity supported lower tiers of electricity access, associated with basic energy connections, which are often achieved through off-grid solutions (Energizing Finance, Understanding the Landscape, SEforALL, 2019).

The IDA19 climate change policy commitments in their current form constitute a missed opportunity to focus more explicitly on acute energy access deficits in IDA member countries and to move to more impact-focussed investments. Including more robust RMS indicators to track energy access gains in HICs, and via off-grid sources, is crucial to target investments and increase transparency around the Bank's work to improve people's access to energy and reduce poverty.

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## 14. The ONE Campaign

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The ONE Campaign

Civil Society Organization/Advocacy

United States

### **The ONE Campaign Comments on the IDA19 Deputies' Report.**

Thank you for the opportunity to comment on the draft IDA 19 Deputies' Report. We welcome the progress that has been achieved during the replenishment consultations. IDA19's ambitious policy package must be matched by an equally ambitious financing framework to achieve transformational change, thus we call on all participants to support a robust replenishment.

Our comments focus on the Private Sector Window (PSW). While important improvements have been made to the PSW, including support for enhanced transparency and an independent evaluation by the mid-term review, we strongly recommend:

- The inclusion of governments, civil society and beneficiary communities (instead of only private firms) in the development of projects – i.e. decision making around project selection, subsidy design and targeting – to maximize development outcomes;
- A transparent process to calculate the level and recipients of PSW subsidies using competitive approaches or open offers. This should be underpinned by the open contracting data standard to ensure fairer deals; and
- If the full PSW allocation is not exhausted (meeting transparency and impact criteria) then the remaining money should be made available to governments after a certain amount of time.

Best wishes for a successful final replenishment meeting.

No – Subscribe to Friends of IDA newsletter

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