

# **Land, Housing and Indigenous Peoples' Rights in the Draft World Bank Environmental & Social Framework**

## **ROUNDTABLE OUTCOME DOCUMENT**

**October 6, 2014  
Washington DC**



On October 6, 2014 in Washington DC, Inclusive Development International, Oxfam, Heinrich Boll Foundation and Forest Peoples Programme hosted a roundtable discussion with the World Bank on land, housing and indigenous peoples' rights in the first draft Environmental and Social Framework (ESF).

Civil society groups and indigenous peoples' organisations from around the world have expressed serious concerns about the potential impact of the draft ESF on the lives and livelihoods of affected peoples, if it were to be adopted in its current form. This included over 120 civil society organizations, social movements, indigenous peoples' organizations, professional associations and scholars issuing a statement strongly rejecting the failure to protect land rights and prevent impoverishment in the draft framework.<sup>1</sup> The statement argues that the draft framework represents a significant dilution of current policies, which will exacerbate the global land tenure insecurity crisis, undermine international human rights standards and force poor and vulnerable groups to shoulder the costs of development.

The roundtable brought together members of the World Bank Safeguards Review Team, Legal Department and social safeguards specialists along with approximately 75 experts, practitioners, academics, and civil society representatives from a wide range of countries, including Kenya, Ethiopia, Guatemala, Egypt, Mexico, Cambodia, Bangladesh, Germany, Sweden, UK, US, France and Canada.

The roundtable discussion examined what the draft ESF would mean in practice for land, housing, and indigenous peoples' rights vis-à-vis World Bank operations. The discussion was prompted by case study presentations on the adverse impacts of four Bank projects in Kenya, Cambodia, Laos and Guatemala.<sup>2</sup> Following the presentations, participants engaged in an open discussion on whether the draft ESF would effectively protect land rights and safeguard against these types of impacts.

It was acknowledged with appreciation that in a number of respects, the proposed ESF contains improvements on the current safeguard policies with respect to land, housing and indigenous peoples' rights. When Environmental and Social Standard (ESS) 5 on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement is triggered and effectively applied, it would prohibit forced evictions,<sup>3</sup> including of informal settlers, who are accorded important entitlements, upon resettlement including "arrangements to allow them to obtain adequate housing with security of tenure."<sup>4</sup> ESS5 also has a broader scope than the current policy with respect to restrictions on land use and access to natural resources. When ESS7 on Indigenous Peoples is triggered and effectively applied, it will respect the right of indigenous peoples' communities to give or withhold their free, prior and informed consent in certain circumstances, including when projects impact on their

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<sup>1</sup> See: <http://www.inclusivedevelopment.net/joint-statement-world-banks-draft-safeguards-fail-to-protect-land-rights-and-prevent-impoverishment-major-revisions-required/>

<sup>2</sup> The presentations are available at: <http://www.inclusivedevelopment.net/safeguarding-land-housing-and-indigenous-peoples-rights/>

<sup>3</sup> ESS7, para 27.

<sup>4</sup> ESS5, para 25. This does not include people who settle in the project area after the cut-off date for eligibility of entitlements (para 26).

land and natural resources or cause relocation.<sup>5</sup>

With due regard to these improvements, the case studies nonetheless surfaced many weaknesses in the proposed ESF that create a high level of risk that project-affected people and communities will suffer serious harms and violations of their land, housing and natural resource rights. The case studies also highlighted the various exemptions, exclusions and avenues available to avoid having to meet the ESS as laid out in the draft framework. Below is a summary of some of the main concerns that were raised by participants during the discussion. This summary is intended to provide a comprehensive overview of the civil society and independent expert comments shared during the roundtable, and does not necessarily reflect the full views of the convening organizations.

### **1. Development and benefit-sharing objectives of resettlement are gone**

- An objective of the current OP/BP 4.12 is for resettlement to be treated as a development opportunity and to structure the project so that those displaced can share in project benefits. Under ESS5, these are no longer objectives.
- Benefit-sharing is one of the most effective and sustainable methods for ensuring those displaced are not made worse off and instead become beneficiaries of Bank-assisted projects. For example, a share of the profits from a large hydropower dam could go to the people who invested their land and livelihoods to make the project possible. This would mean that ongoing dividends could be provided in a sustainable manner to affected people over the project's lifetime or for as long as benefits are being generated (whichever is longer). Benefit sharing is international best practice, which should be a requirement of ESS5 whenever it is possible to structure a project in such a manner.

### **2. Weak due diligence requirements: (a) No requirement to assess whether the displacement impacts are reasonable and proportionate to the development benefits of the project; and (b) over-reliance on E&S assessment by the Borrower**

- There is no requirement to demonstrate that the project is justified by taking into account both its intended development benefits as well as its displacement impacts. International human rights law standards require that evictions, including involuntary resettlement, are only undertaken for the promotion of the general welfare and are reasonable and proportionate to the benefits that will ensue. The ESF pre-supposes that the project development rationale justifies the displacement, regardless of its magnitude and impacts.
- The ESF should require that the Bank assess the benefits that will accrue to the general welfare and weigh this against the magnitude of displacement and the risk of harms to affected people. As a part of the Bank's due diligence, it should be asking: Is the risk proportional to the public good that the project will achieve? This requires a

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<sup>5</sup> ESS7, para 19.

cost-benefit analysis that includes a realistic assessment of whether the risks of harm due to displacement can and will be effectively mitigated. If risks are disproportionate to the public good, or if risks are unlikely to be effectively mitigated, then the project should not be approved. The political economy environment in the Borrower country, and the relevant track record of the government, must be taken into account in this analysis.

- Under the ESF, the Bank is only required to conduct E&S due diligence based on an E&S assessment provided by the Borrower.<sup>6</sup> It can at its discretion seek further information, but is not required to confirm the accuracy or rigor of the Borrower's own assessment by actively seeking a range of views from a variety of sources, including potentially affected people.
- Incentive structures and past experience would suggest that the Bank will usually not use its discretion in a manner that could instigate tensions with the Borrower, and thus would be unlikely to seek alternative and independent-third party views to verify the Borrower's assessment, unless it is compelled to do so by the ESF.

### **3. Weak and significantly diluted requirements for resettlement planning: Externalizing the costs of displacement**

- The current OP 4.12 requires: "As a condition of appraisal of projects involving resettlement, the borrower provides the Bank with the relevant draft resettlement instrument which conforms to this policy, and makes it available at a place accessible to displaced persons and local NGOs, in a form, manner, and language that are understandable to them."<sup>7</sup> This crucial requirement has been removed in favor of the 'deferred appraisal' approach, which is intended to make project approval easier, quicker and less costly. Under the draft, all that is required prior to project approval – even for high-risk projects causing large-scale displacement – is an Environmental and Social Commitment Plan (ESCP). According to an annex to the ESF, in some cases the ESCP will capture all relevant obligations of the Borrower, and in others, it may simply set out a timeline for resettlement and livelihood plans to be prepared after project approval.<sup>8</sup> It is therefore left to the discretion of the Bank in consultation with the Borrower when comprehensive resettlement plans and corresponding budgets are to be developed.
- ESS1 prohibits the Borrower from commencing activities that may cause harm such as evictions and resettlement until relevant plans have been completed as agreed in the ESCP to the satisfaction of the Bank.<sup>9</sup> However, after the project has been approved and funds are disbursed, the Bank loses the vast majority of its leverage to ensure displacement does not occur without a comprehensive resettlement plan in place. And affected people and NGO monitors would lose the critical opportunity to

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<sup>6</sup> Policy, para 29 -30.

<sup>7</sup> OP 4.12, para 22.

<sup>8</sup> ESS1 Annex 2, para 4.

<sup>9</sup> ESS1, para 36.

evaluate and comment on draft resettlement plans and budgets before the Board votes on the project. History shows that the Bank is reluctant to suspend disbursements for an already approved project to compel compliance with E&S safeguard requirements. This is realistically the only legal remedy available to the Bank post-approval for non-compliance by the Borrower with the ESCP. It is foreseeable that without comprehensive pre-approval planning, the consequence will be an increase in problematic projects causing serious harms, ultimately resulting in significant unexpected delays, suspensions and increased costs for the Bank.

- Unlike the current OP 4.12, which states that “the full costs of resettlement activities necessary to achieve the objectives of the project are included in the total costs of the project,”<sup>10</sup> the ESF treats the costs of resettlement as ancillary to the costs of the project. In fact, due to the deferred appraisal approach, the full cost of the project may not even be known when the project is approved because there is no requirement for a comprehensive resettlement plan (with baseline socio-economic studies, inventories of losses and an economic analysis of the cost of asset replacement and livelihood restoration) during the project appraisal stage. Without this knowledge, the Bank has no way to assure itself that the Borrower is willing and able to provide the full resources necessary to cover the costs of resettlement. The result of this is certain to be cost externalization, in which cost burdens are shifted on to the families being displaced.
- The ESF must require resettlement and livelihood support plans to be prepared and budgeted *prior* to project approval and included in the total project budget, and Bank social scientists and economists must assess those plans and budgets as a key determinant of whether or not to support the project. Furthermore, the ESF should outline the enforcement actions and sanctions available to the Bank during the life of the project to affect the behavior of the Borrower in cases of non-compliance. The high-stakes option of disrupting disbursement is, by itself, insufficient to provide Bank staff with the leverage needed to affect real change to the manner in which problematic projects are being implemented and where sustained non-compliance has been identified.
- Resettlement plans are also likely to be less comprehensive, since crucial requirements for what needs to be included in these plans - clearly set out in the current OP/BP 4.12 - are not described in the ESF. The Bank claims that these details will be included in forthcoming procedures or directives, however at the time of the event, the Bank had not clarified when drafts of these documents will be finalized and publicly released, whether drafts will be subject to public consultations, and whether final procedures and directives will be binding on the Bank and Borrowers.

#### **4. Downstream impacts are not covered by ESS5**

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<sup>10</sup> OP 4.12, para 20.

- ESS5, like OP4.12, would not cover people suffering downstream displacement impacts, because its scope is limited to impacts of land acquisition and restrictions on land use.<sup>11</sup>
- This means that people who are physically or economically displaced due to downstream impacts will not be accorded the protections required by ESS5 to ensure they are not made worse-off. For example, fishing villages that lose their livelihoods because of the adverse impacts to the river eco-system that diminish fish resources caused by hydropower dam constructed upstream would not be covered.
- Downstream impacts would need to be caught in the general E&S Assessment (ESS1) and the vague mitigation hierarchy, which has a *compensation* standard, rather than a *restoration* standard.<sup>12</sup> Despite the fact that the experience of economic displacement due to a Bank-financed project is the same whether it be due to land acquisition or downstream impacts, the level of protection under the Framework is highly differentiated. This is likely to result in countless people who are economically displaced being impoverished by Bank-financed hydropower and other projects, as we have seen in the case of the Nam Theun 2 dam in Laos.

## **5. Mitigation hierarchy loopholes: compensate “where technically and financially feasible”**

- As currently worded, the mitigation hierarchy appears to only require compensation for “residual impacts” where it is “technically and financially feasible.”<sup>13</sup> Footnote 22 states:

*Financial feasibility is based on relevant financial considerations, including relative magnitude of the incremental cost of adopting such measures and actions compared to the project’s investment, operating, and maintenance costs, and on whether this incremental cost could make the project nonviable for the Borrower.*

- The implication appears to be that if the cost of compensating or otherwise offsetting remaining adverse impacts, which are not addressed through other mitigation measures, would make the project nonviable for the Borrower, it does not need to compensate affected people for these harms.
- The high costs of addressing the adverse impacts of large-scale displacement may make a project non-viable; but non-viability should mean the project does not proceed, and not that the Borrower need not compensate affected families in order to make the project “viable”. The language of paragraph 25 of ESS1 and footnote 22 must be clarified to reflect this.

## **6. Land titling and national or regional planning for natural resources or land use**

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<sup>11</sup> ESS5, para 5(b)).

<sup>12</sup> ESS1, para 25.

<sup>13</sup> Ibid.

## are excluded from ESS5

- These new exclusions<sup>14</sup> are a major dilution of the current policy, and, if maintained, will foreseeably result in the forced displacement of many poor urban households and rural and communities without the safeguards contained in ESS5. These exclusions are antithetical to the Bank's development or poverty eradication mission and seek only to absolve the Bank from its responsibility to do no harm with respect to projects with potentially wide-ranging and complex effects on land rights and tenure arrangements.
- As currently phrased, the exclusion of 'regulation or planning of natural resources or land use ...to promote sustainability' is an extraordinarily wide exemption from the safeguards provided in ESS5 and could incorporate any conservation-related projects or any interventions to alter land use arrangements for ill-defined 'sustainability' reasons. This exemption could technically have been applied to the Kenya Natural Resource Management Project, despite widespread impacts tied directly to access to and control over land.
- Excluding land titling (or regularization) activities means that households deemed not to have ownership rights under a Bank-financed land sector project that are then threatened with forced eviction will not have any protections under the ESF. This predicament is common for urban poor communities living on land claimed by the State, and the well-documented result is the exacerbation of urban homelessness and poverty as well as increased squatting in unsafe locations (eg. Cambodia Land Management and Administration Project).
- The Bank should only agree to support land sector programs that include the development and adoption of a resettlement policy that meets the requirements of ESS5. This is a critical element of ensuring that land sector programs are designed to reduce poverty and promote shared prosperity. It is consistently the poorest households that are made vulnerable to eviction under such programs and need the protections of the resettlement policy.

## 7. The scope of ESS5 is drastically reduced

- The current OP 4.12 contains an important clause that is essential to protecting project-affected people who are displaced in order to achieve the objectives of Bank-financed projects. OP 4.12 states:

*This policy applies to all components of the project that result in involuntary resettlement, regardless of the source of financing. It also applies to other activities resulting in involuntary resettlement, that in the judgment of the Bank, are (a) directly and significantly related to the Bank-assisted project, (b) necessary to achieve its objectives as set forth in the project documents; and (c) carried out, or planned to be carried out, contemporaneously with the project.*<sup>15</sup>

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<sup>14</sup> ESS5, para. 7, (d) & (e).

<sup>15</sup> OP 4.12, para 4.

- This critical paragraph, which is instrumental in ensuring that the Bank does not contribute to forced displacement and impoverishment impacts, has been omitted from ESS5. Instead, ESS5 is explicitly limited to displacement due to land acquisition and restrictions on land use. ESS5 should apply to any activity that the Bank contributes to, directly or indirectly, which results in physical or economic displacement. At minimum, the language in OP 4.12 para 4 must be maintained to ensure no dilution.

## **8. The ‘alternative approach’ to ESS7 would set aside critical safeguards for indigenous peoples**

- The so-called ‘alternative approach’ proposal is a startling inclusion into any system of environmental and social safeguards, and allows a Borrower government to request that an entire Standard, ESS7 on Indigenous Peoples, can be set aside if compliance with the Standard is claimed to be against national constitutional law or that it would in some way exacerbate ethnic tensions. There is no convincing development justification for this proposal, and it appears to be a political compromise by the Bank in response to pressure from some Borrower countries.
- The proposal removes from affected indigenous peoples ALL of the safeguards specifically developed to shield indigenous peoples from the worst possible outcomes of imposed development. The Bank has safeguards for indigenous peoples because of a real and lived history of dispossession, impoverishment and rights violations occurring as a direct result of ill-thought out development interventions that have alienated peoples from the lands, territories and resources on which their economic, social and cultural survival depends.
- In the absence of ESS7, the alternative approach calls for other ESSs to be applied to projects impacting on indigenous peoples. However these are simply ill-suited and inadequate to provide protection from the particular social and environmental harms experienced by indigenous peoples. In particular, the special collective attachment to land of indigenous communities is not adequately recognized, respected and protected under ESS5. Critically, ESS5 presumes the exercise of compulsory land acquisition and does not require a process of FPIC prior to resettlement or restrictions on land use. Nor does it require culturally appropriate consultation for other activities that affect indigenous peoples. The ‘alternative approach’ therefore undermines hard-won rights established in international law.
- The relocation-related provisions of ESS7 are also suspended in cases “where indigenous peoples individually hold legal title, or where the relevant national law recognizes customary rights for individuals” (ESS7, paragraph 25, footnote 14). This again removes the specific protections of ESS7 from indigenous peoples based on actions of the government, and with no input or active involvement of the affected indigenous peoples. Many countries with indigenous peoples have no recognition of collective tenure and instead impose individual tenure arrangements on these people



as the *only form of tenure recognition available*. This cannot be a justifiable basis on which to exclude such peoples from ESS7 protections under paragraph 25 of the standard.

## **9. Only “high risk” subprojects trigger the standards**

- In another major dilution, under the ESF, subprojects classified as having a “substantial” or lower E&S risk only need to comply with national regulations, including on land expropriation and resettlement. In most Borrower country jurisdictions the legal framework on land acquisition and resettlement are very weak and often incomplete. This sub-projects loophole applies to both real and financial sector investments.<sup>16</sup> This is one of the most dangerous dilutions in the ESF.
- It is the Borrower’s responsibility – both in the case of governments and financial intermediaries, such as commercial banks and private equity funds - to classify the project.<sup>17</sup> The Bank can at its discretion require that all high-risk subprojects be first approved by the Bank, but the classification itself is made by the Borrower.
- The Framework incentivizes the Bank and Borrower to design projects so that they are implemented through subprojects wherever possible, and to classify subprojects as having a ‘substantial’ rather than a ‘high’ risk, in order to reduce the costs and attention required in terms of E&S management.

## **10. Failure to address inherent dangers of high-risk financial intermediary (FI) projects**

- The World Bank should not be in the business of financing high (and substantial) risk FI projects and subprojects. These should be prohibited under the Framework. The experience of the IFC (eg. Ficosha in Honduras, Dragon Capital in Cambodia/Laos, Santa Rita in Guatemala) shows that FI environmental and social management systems are not effective at identifying and addressing risk. The proposed Framework’s point of departure for safeguards around FI investments is the same as the IFC’s: it relies on delegated responsibility for E&S assessment, management and monitoring. The Framework does not require significant oversight or intervention from social safeguard specialists at the World Bank. So why would the results for the World Bank be any different to the unsatisfactory performance of the IFC?
- The main development rationale for FI investments is to improve access to credit for SMEs. These are not, and should not, be high social and environmental risk investments.

## **11. Inadequate safeguards on land tenure**

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<sup>16</sup> ESS1, para 29; ESS9, para 14.

<sup>17</sup> Policy, para 34 and 36(a).

- Secure access to land underpins successful development. In addition to its social function, it is both the safety net for poor households and a foundation from which poor households can increase their economic potential.
- As seen in the Guatemala Land Administration Program, World Bank projects can have extremely adverse impacts on land tenure, which are not covered by the involuntary resettlement standards. Yet, the only safeguards that exist in the draft Framework are a sentence in the list of issues to be taken into account by Borrowers in conducting their social assessments<sup>18</sup> and a number of further protections for Indigenous Peoples. This level of protection is not commensurate to the importance of land to people’s lives and livelihoods or to the potential for adverse impacts of Bank-financed projects on people’s secure access to land.
- Standards on land tenure should include, inter alia:
  - Binding safeguards to ensure that land transactions that occur in connection with Bank-financed projects, including agriculture projects, are truly voluntary (“voluntary land transaction” are explicitly excluded from ESS5 and this issue is only addressed through a non-binding footnote<sup>19</sup>);
  - Protections for project affected communities who are either indigenous or non-indigenous but practice a customary or collective tenure system;
  - Safeguards against instigating land conflict and/or weakening of tenure status in both urban and rural areas; and
  - Safeguards against increased land consolidation and inequality in land holdings, including through projects that encourage land speculation, prioritize individual freehold above other forms of tenure, and empower or incentivize the State to claim land used by others.
  - Measures to ensure that Bank-supported land projects are strengthening, securing and prioritizing the tenure rights of vulnerable and marginalized people so that they enjoy, at minimum, legal protection against forced eviction and illegitimate use by others of land and natural resources that they depend upon for their housing and/or livelihoods.
- Despite commitments that the review of the safeguard would be informed by the Voluntary Guidelines on Tenure, endorsed by the UN Committee on Food Security, one of the basic tenets of the Guidelines is not meaningfully incorporated in the ESF: It fails to meaningfully ensure respect for the multiple tenure forms affected by Bank-financed projects, including through measures that increase tenure security.

## **12. Lack of clarity with respect to countries with a majority indigenous population and customary land tenure**

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<sup>18</sup> ESS1, para 26(b)(v): Borrower takes into account: “risks or impacts associated with land and natural resource tenure and use, including (as relevant) potential project impacts on local land use patterns and tenurial arrangements, land access and availability, food security and land values, and any corresponding risks related to conflict or contestation over land and natural resources.”

<sup>19</sup> ESS5, para 5(a) and footnote 11.

- ESS7 on Indigenous Peoples envisions the identification of a distinct social and cultural group, rather than a majority indigenous population.<sup>20</sup> What does this mean for projects in countries in Africa and the Pacific, such as Papua New Guinea, where the majority of the population is indigenous and practices a customary collective form of tenure? In these countries customary forms of tenure govern a majority of the landmass, with individual clans having a collective attachment to distinct territories.
- ESS7 may not be triggered in these circumstances; indeed, currently there is uneven and inconsistent application of OP 4.10 in such contexts. In cases in which the indigenous peoples' policy is not applied, there are no robust safeguards to protect the customary land tenure systems of these populations. As a result these land tenure systems are vulnerable to being dismantled by World Bank land administration and other projects that promote individualized land tenure to facilitate integration of land into global finance systems. Indigenous clans are vulnerable to dispossession from their collective territory as a result.
- Either the scope of ESS7 should be broadened to encompass circumstances in which the majority of the population in a country practices a customary form of tenure, or this important issue should be addressed in a separate set of standards on land tenure, to ensure no harm is done to these populations.

### **13. Open-ended compliance and abdication of Bank responsibility**

- Unlike the current safeguard policies, which spell out clear rules that are immediately binding on both the Bank and the Borrower, under the draft Framework, the Bank must only “ require the Borrower to structure projects so that they meet the requirements of the ESSs in a manner and timeframe acceptable to the Bank.” This formulation makes it very difficult to hold the Bank accountable to its own safeguard policies. It provides Bank staff with unfettered discretion to decide what constitutes compliance on the part of Borrowers. The institutional incentives and accountability structures at the Bank are skewed towards maintaining good relationships with Borrowers and pushing loans out the door, which indicates that this new discretion will not be used to ensure better social and environmental outcomes.

### **14. Weak supervision and monitoring and evaluation requirements**

- The IEG report identified the lack of adequate supervision and monitoring and evaluation as a long-standing problem. However, rather than strengthening Bank supervision arrangements and increasing independent and community monitoring and evaluation of safeguards, as recommended by IEG, the draft Framework relies much more heavily on Borrowers' monitoring reports and evaluations as the basis of Bank supervision. Under the ESF, the Bank's monitoring and supervision role may be limited to reviewing annual reports provided by the Borrower.<sup>21</sup>

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<sup>20</sup> ESS7, para 6.

<sup>21</sup> Policy, para 46; OP 10.00 para 21; BP 10.00, para 40; and ESS1, para 51.

- The draft Framework fails to incorporate the IEG’s important recommendation that the Bank “include performance indicators on environmental and social outcomes in project results frameworks and ensure systematic collection of data to monitor and evaluation safeguards performance.” If the Bank is going to continue to finance displacement, then it has a responsibility to ensure accurate baseline data collection prior to displacement and a transparent accounting at project completion that no displaced people were left worse off than without the Bank project. The monitoring and evaluation provisions in the ESP, ESS1 and ESS5 fail to ensure this, and represent a dilution of the current provisions in OP/BP 4.12, which are themselves inadequate.
- The Bank claims that the ESF would lead to better E&S outcomes. Yet, there are very weak requirements for evaluating outcomes. The Policy states only that: “A project will not be considered complete until the measures and actions set out in the legal agreement (including the ESCP) have been implemented.”<sup>22</sup> This requires an evaluation of outputs – the *completion of measures and actions* - rather than outcomes: whether ESS *objectives have been achieved*. The Bank is obliged only to verify that the measures and actions in the ESCP have been executed.

#### **15. Reduced accountability through Inspection Panel**

- The clear separation of obligations in the ESF, which places the responsibilities for meeting the standards squarely on the Borrower, and the vague due diligence, monitoring and supervision requirements of the Bank that allow for open ended compliance, mean that there are fewer sharp hooks against which the Inspection Panel can assess compliance. This could result in reduced accountability of the Bank through the Inspection Panel process and diminish access to effective remedies for project-affected people.

#### **Annexes**

1. Participants List
2. Presentations

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<sup>22</sup> Policy, para 46.

## Annex 1 Participant List

1	Josh Lichtenstein	BIC	Campaign Director
2	Chris Kidd	FPP	Project Officer
3	Joshua Klemm	BIC	Safeguards campaign coordinator
4	jocelyn medallo	ciel	senior attorney
5	Gretchen Gordon	Bank on Human Rights	coordinator
6	David Pred	IDI	Managing Director
7	Natalie Bugalski	IDI	Legal Director
			Sr Environmental Advisor -
8	Leslie Johnston	USAID	MDBs
9	Brian Keane	USAID	Agency Advisor on Indigenous Peoples
		International Accountability	
10	John Mwebe	Project	Policy Coordinator
11	Rachel Bayly	US Treasury	International economist
12	Emily Goldman	Human Rights Watch	Development Policy Intern
13	Upasana Khatri	EarthRights International	Bertha Foundation Legal Fellow
14	Scott Adams	CAO	Specialist Dispute Resolution
15	Nicolas Mombrial	Oxfam International	Head of office
16	Jessica Rosien	Oxfam Australia	Advocacy Coordinator
17	Chloe Christman	Oxfam America	Advisor, Land Rights and Markets
18	Jodi vittori	Global witness	Policy adviser
19	Birgit Kuba	World Bank Inspection Panel	Junior Professional Officer
20	Caleb Stevens	World Resources Institute	Property Rights Specialist
21	Nezir Sinani	Bank Information Center	Climate Change Consultant
22	Luiz Vieira	Bretton Woods Project	Coordinator
23	Hanna Miller	NYU global justice clinic	Student attorney
24	Rosie Keegel	Open Society Foundations	Program Associate
		WBG Office of Executive	
		Director for Denmark, Estonia,	
	Paul Sverre Siljan	Finland, Iceland, Latvia,	
25	Tharaldsen	Lithuania, Norway, and Sweden	Senior Advisor
26	Cecile Pot	World Bank	Advisor for the French ED
27	Jerry Fowler	OSF	Sr Policy Analyst
28	Chris Jochnick	Oxfam America	Director, Private Sector Department
	archana		
29	palaniappan	oxfam	policy and advocacy advisor
30	Anicca Jansen	USAID	retired
31	Dolores Koenig	American University	Professor of Anthropology
32	Martin Kipping	WBG	Advisor to the German ED
		International Consortium of	
33	Sasha Chavkin	Investigative Journalists	Reporter
		Open Society Foundations -	
34	Maria Aghajanyan	Armenia	Senior Program Coordinator
35	Lauren Foiles	Bank on Human Rights Coalition	Human Rights and Development Finance Intern
36	Cristiane	CIEL	Intern
	Barbara Rose		
37	Johnston	Center for Political Ecology	Senior Research Fellow
38	Ladd Connell	Conservation International	Director, Multilateral Relations
39	Imali Bandara	Wellspring Advisors	Program Assistant, International Human Rights

	Carla Garcia		
40	Zendejas	CIEL	Director, People, Land & Resources Program
41	Diana Parker	University of Maryland Housing and Land Rights Network	Doctoral student
42	Rabie Wahba		Program officer
43	Kebadu Belachew	KASK Foundation	Founder
44	Julia Gallu	CAO	Dispute Resolution Specialist
45	Dahlia Rockowitz	American Jewish World Service	Policy Associate
46	Moataz El Shehawy	On behalf of BIC	Interpreter, English - Arabic
47	Amanda Monaco		
48	Ameyali Ramos	United Nations University Solidarity Movement for a New Ethiopia	Research Fellow
49	Obang Metho		Executive Director
50	Sosina Berhanu	SMNE	Director Of Research
51	Michael M. Cernea Katherine	Brookings Institution	Senior Fellow
52	McDonnell Mohamed Abd	EarthRights International Egyptian Center for Civil and Legislative Reform	attorney/Bertha Fellow
53	Elazim		Executive Director
54	Serge Selwan	WB Inspection Panel Secretariat	
55	Rayyan Hassan	NGO Forum on ADB	Executive Director
56	Sosina Asfaw	SMNE/Independent	Researcher
57	Juan Carballo	FUNDEPS	Executive Director
58	Laurie Puzio	Independent Consultant	
59	Patience Fielding	Rights and Resources Initiative	Manager
60	Ian Ramsey-North	Rights and Resources Initiative	Coalition Coordination and Development Associate
61	Sarah Armstrong	Indian Law Resource Center	Legal Intern
62	Jenny Springer	RRI	Director, Global Programs
63	Amy Stilwell	World Bank Group	Senior Communications Officer
64	Alexandra Bezeredi	World Bank	Safeguards Advisor, Africa
65	Charles Di Leva	World Bank	Chief Counsel
66	Afshan Khawaja	World Bank	Lead Social Development Specialist
67	Jocelyn Medallo	CIEL	Senior Attorney
68	Jon Lindsay	World Bank	Lead Counsel
69	Caitlin Daniel	Accountability Counsel	Staff Attorney
70	Janis Alcorn	RRI	Director Country & Regional Programs
71	Patience Fielding	Rights abd Resources Inititaive	Manager, Tenure Facility
72	Jorge Munoz	World Bank	Practice Manager
73	Mark King	World Bank	Chief Officer
74	Sasanka Thilakasiri	Oxfam International	
75	Kate Geary	Oxfam International	
76	Rachel Grant	DFID	Policy Advisor
77	Helen Tugendhat	Forest Peoples Programme	Policy Advisor
78	Bruce Shoemaker	Independent Researcher	
79	Thoun Ratha	Equitable Cambodia	Senior Researcher
80	Fernando Galeana	Cornell University Maryknoll Office for Global Concerns	PhD Candidate
81	Chloe Schwabe		Faith, Economy, Ecology Program Director