**18 May 2021**

*Submitted via email*

**To: World Bank Group Executive Directors**

**Civil society statement on World Bank Group (WBG) failing to follow its own consultation guidelines on new Climate Change Action Plan**

The undersigned civil society organisations write to express our concern that the World Bank Group has failed to follow its own consultation guidelines in the case of its new Climate Change Action Plan (CCAP) for 2021-25.

Per the Bank’s [guidelines](https://pubdocs.worldbank.org/en/248301574182372360/World-Bank-consultations-guidelines.pdf), published in June 2019, “Any new policy development process, including proposed new policies...include [sic] consultation with stakeholders.”

While not a policy per se, given the high profile afforded the forthcoming CCAP during the recent virtual World Bank Spring Meetings, where it was heralded by WBG President David Malpass in a string of public events and statements as an important new flagship strategy of the Bank – with the President [noting](https://www.worldbank.org/en/news/statement/2021/04/02/world-bank-group-president-statement-on-climate-change-action-plan?cid=ECR_TT_worldbank_EN_EXT) in a statement on the CCAP that, “Our collective responses to climate change, poverty and inequality are defining choices of our age” – it is difficult to accept that the CCAP doesn’t fit the criteria of a ‘policy development process.’

Given the already severe impacts of climate change, and the urgent need to reduce greenhouse gas emissions, civil society organisations have also noted the potential importance of the CCAP, including in an [open letter](https://www.brettonwoodsproject.org/wp-content/uploads/2021/03/Open-letter-to-World-Bank-President-David-Malpass-and-World-Bank-leadership_FINAL_153.pdf) sent in March, in which they called on the Bank to adopt a whole-of-institution commitment to end all types of support for fossil fuels, and support member countries' just transition efforts.

One of the initial motivations for writing the open letter in March was precisely *the lack of a clear explanation from the World Bank about whether there would be an open and transparent consultation on the CCAP.* In the covering email for this open letter and in numerous other instances in recent months, civil society organisations have made clear that they would welcome an opportunity to comment on the full draft of the CCAP.

Unfortunately, the [comment period](https://blogs.worldbank.org/voices/join-conversation-our-new-climate-change-action-plan) for the CCAP announced by Bank management on 4 May, and closing today, falls short of our expectations, and does not conform to the Bank’s published consultation guidelines in numerous respects, including (*inter alia*):

* There was no notification period prior to the announcement of the comment period, and the comment window is not listed on the World Bank [consultations page](https://consultations.worldbank.org/search?search=&f%5b0%5d=language%3Aen);
* There is no indication that a consultation plan was discussed and approved by the World Bank’s executive board prior to the comment period being announced, as per the Bank’s recommended good practice;
* There is no explanation of how comments received by the Bank will be used.

Most importantly, in a highly unusual step, the Bank has offered civil society the opportunity to comment on a slide deck (i.e. PowerPoint presentation) of the CCAP, rather than a draft version of the CCAP. This is problematic, not least because it is our understanding that the slides were already discussed by the World Bank’s Board on 1 April, as alluded to in President Malpass’s [public statement](https://www.worldbank.org/en/news/statement/2021/04/02/world-bank-group-president-statement-on-climate-change-action-plan?cid=ECR_TT_worldbank_EN_EXT) on the CCAP dated 2 April. Discussions between civil society and World Bank executive directors during the Spring Meetings made clear that the Board had already endorsed the slides, and that further discussions between the Bank and shareholders on final details of the CCAP were ongoing. **This raises the possibility that the Bank has invited comments on a slide-deck that is already out-of-date, and may lack key details that will be included in the final version of the CCAP.** The information provided in the blog post where the comment period was announced is insufficient for civil society to make an accurate assessment of this, and fails to align with the Bank’s consultation guidelines, which state that, ‘Stakeholders need access to all relevant information in advance.’

The timing of the comment window is also much shorter than required by the Bank’s guidelines, which note, “The minimum requirement for the duration of a consultation on a new policy and a national strategy is normally 8-12 weeks on average. For smaller programs and reports, the consultation period is normally not shorter than 4 weeks.” The short timing of the comment period minimises the possibility of civil society actively engaging in the process in a more propositional way - in light of the imperfect nature of the information provided.

Overall, it is clear that the CCAP comment period cannot be considered a proper consultation, according to the Bank’s own guidelines. In failing to ensure an open and transparent consultative process, World Bank management is demonstrating a lack of willingness to engage with civil society in good faith on the CCAP’s development. In the context of shrinking civic space, we would hope the Bank would be setting a strong example for engaging civil society rather than excluding it from such processes.

We call on the World Bank’s executive directors to ensure that the World Bank follows its own guidance on consultation processes going forward, to avoid the appearance of such comment periods constituting ‘box ticking’ exercises that have little bearing on policy development processes.

**As an immediate first step, we call on the Bank’s executive directors to ensure a proper public consultation on a full draft of the CCAP.**

**The undersigned:**

350 Denmark Denmark

350.org Global

AbibiNsroma Foundation Ghana

ACCESS Coalition Kenya

Arab Watch Coalition MENA

Bank Information Center USA

Beog Neere Burkina Faso

Big Shift Global Global

Both ENDS Netherlands

Bretton Woods Project UK

Centre for Citizens Conserving (CECIC) Uganda

Christian Aid UK

Convention de la Société Civile Ivoirienne (CSCI) Côte d'Ivoire

EKOenergy ecolabel Global

Eurodad Europe

Friends of the Earth U.S. USA

Fundación Ambiente y Recursos Naturales (FARN) Argentina

Fund Our Future South Africa

Gender Action USA

Glasgow Greener Practice Group Scotland

Global Rights Nigeria

Greenpeace Global

Heinrich Boell Stiftung Washington, DC USA

Interamerican Association for Environmental Defense (AIDA) Latin America

Jamaa Resource Initiatives Kenya

Leadership Conference of Women Religious USA

Mom Loves Taiwan Association Taiwan

Oil Change International Global

Oxfam Global

Recourse Netherlands

SUHODE Foundation Tanzania

Uganda Coalition for Sustainable Development Uganda

Urgewald Germany

Weald Action Group UK

WeDontHaveTime.Org Global