

Comments from the Federal Ministry of Economic Cooperation and Development, Federal Republic of Germany, on the WBG Gender Strategy Draft 2024-2030

The German Federal Ministry for Economic Cooperation and Development (BMZ) would like to commend the World Bank Group and especially the World Bank's Gender Team on the ambition expressed in the WBG Gender Strategy 2024- 2030 to accelerate progress on gender equality. The BMZ welcomes the WBG's determination to accelerate gender equality, aiming for gender transformative impact and addressing social norms. We welcome the inclusive, non-binary understanding of gender and the consideration of intersecting discrimination. Our Ministry's Feminist Development Policy (launched March 2023) is based on similar ambitions. This joint basis offers opportunities for more cooperation on gender equality in the near future. BMZ shares the view of the WBG Gender Strategy Draft on 'acting collectively' and would like to add that, considering the current pushback against gender equality, now is the time to engage in a concerted way.

The BMZ fully supports the strengthening of strategic goals and outcomes and agrees with the focus on enabling services and the emphasis on women's leadership. Having in mind the gender dimension of global development challenges, we consider women and marginalized groups as agents of change and see diversity as a factor of progress.

We welcome that the 2030 Agenda and SDG 5 are prominently mentioned in the WBG Gender Strategy Draft. However, we would welcome more reference to the individual goals and corresponding targets. With the time horizon of this gender strategy until 2030, the WBG's contributions to the individual sub-goals of the 2030 Agenda could be more precisely elaborated to prove the excellent value of this strategy and to ensure greater commitment.

The shift to accountability for results appears to be a significant step forward. In our view, the operationalization and implementation of the WBG Gender Strategy will benefit from a stronger focus on development effectiveness and a more qualitative approach to monitoring its implementation, especially with regard to the long-term impact of gender transformative approaches. At this stage, it is important to lay the ground for baselines and indicators in order to measure progress in the years to come. Therefore, we would like to suggest agreeing on more common standards on qualitative monitoring systems, covering all aspects of gender equality, including legal and social norms, daily practice, behavior and attitude.

In line with this, the planning of operationalization and implementation of the WBG Gender Strategy needs to be clarified in various aspects: to what extent will the strategy lead to qualitative and quantitative changes in the project pipeline and in the frequent use of gender tags/flags? We recommend that the administration use the lessons learned and best practices from the previous strategy¹ to present a more concrete approach to implementing impactful projects. Here, BMZ would like to emphasize the importance of mainstreaming gender equality, which goes beyond the fields of work highlighted in the WBG Gender Strategy Draft, and ask for more links with other working fields and strategies, besides the six outcomes initially mentioned.

To a large extent, the WBG Gender Strategy Draft relies on future research and analysis to develop innovative approaches to operationalize and implement it. We would like to point to the fact that as of today many inequalities are well documented and known. Therefore, we would like to suggest creating a timeline with short, middle-term and long-term goals and a

¹ Mainstream gender equality into the day-to-day work of the WB and systematically integrate a gender mainstreaming approach, e.g. create a strategic link to the work in country offices, coordinate staff and create guidance and access to knowledge, monitor implementation, supporting country/project teams.

context-related estimation of feasibility. This could be done by a more regionally differentiated approach, or by focusing on barriers and veto players in thematic areas of international development.

Following the WBG Gender Strategy Draft's description, it is not entirely clear how gender tags/flags will be used to improve accountability and impact monitoring. It has been mentioned that gender impacts could be better presented and reviewed in implementation and completion reports, status reports, project monitoring reports, etc. However, the tags/flags are not further broken down in terms of their level of ambition and purpose. This system leaves it somewhat unclear what type of projects the WBG will be implementing and what gender gaps will be prioritized. Similarly, it remains unclear to some extent how the priorities of the strategy will be translated to the project level.

Based on the work already done with gender tags/flags, the BMZ recommends the WBG to adopt the OECD DAC Gender Equality Policy Marker. The existing marker systems are not fundamentally different, but do have major parallels. A switch to the OECD DAC Marker or a harmonization with it holds great potential for the impact and operationalization of the WBG Gender Strategy and would be fully in line with the "One WBG" and the "MDBs as a system" approach. The use of the OECD DAC Marker or its essence would lead to better international comparability, improved opportunities for cooperation and increased accountability. BMZ therefore clearly advocates for the use of the OECD DAC Marker or the essence thereof, as it is one of the most established worldwide. However, harmonization should be the minimum: Adding more qualitative aspects to the gender tags/flags system, including a gradation of more or less ambitious interventions, would strengthen accountability in terms of impact. BMZ stands ready to discuss further details on this matter at a technical level.

Regarding the intersection of gender with poverty, ethnicity, disability, and other characteristics, we would like to ask in which way the WBG takes into account strategies for children and youth and persons with disabilities, and to what extent does the WBG Gender Strategy Draft try to include the existing strategic approaches? We believe that the intersectional approach requires a clear commitment of the international development organizations to the human rights-based approach and continued support of the implementation of the respective international conventions.

BMZ appreciates that the thematic note on sexual orientation and gender identity (SOGI) further elaborates on the concept of gender equality on behalf of the sexual minorities by strategically referring to the three pillars of the WBG Gender Strategy Draft (GBV, economic opportunities, women as leaders). We fully endorse the intention to expand the strategy, where possible, to the LGBTIQ+ communities.

In our view, however, it is at the same time necessary to go beyond a mere inclusive strategy and pursue, as already indicated by the four working areas of the WB thematic note, new approaches specifically targeting the disadvantaged groups of sexual minorities. Therefore, we suggest following a context-specific approach and engage with country offices and civil society on the ground more intensely. We strongly support the view that more data and impact studies will be needed for better project design. Thus, we look forward to the next round of data collection by the EQOSOGI initiative, this time covering 62 countries.

We already indicated our support for "acting collectively". The WBG Gender Strategy Draft should further explain the different ways (and ultimately the WBG's views and priorities) of how best to engage with other national and international actors and civil society (including grass-root level). This could lead to a more intense international cooperation with state and non-state actors alike as well as with civil society regarding the implementation of strategies and action plans, as well as collective action throughout the project cycle. In the same way, we would welcome more information about partnerships with UN Women, 2X Global and

others, exceeding gender data and analysis and describing the various contributions of international actors and how they work together towards gender equality.