

IDA20 DRAFT DEPUTIES' REPORT
Summary of Comments Received from the Public Consultation and Actions Taken
December 8, 2021

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INTRODUCTION

In February 2021, IDA Deputies and Borrower Representatives reached consensus on advancing IDA20 by one year, to allow IDA19 to support extraordinary efforts in tackling complex development challenges brought about by the COVID-19 pandemic and crisis. The First IDA20 Replenishment Meeting was held in April 2021 and was followed by additional meetings in June and October 2021.

Since the early replenishment was announced, various stakeholders expressed great interest. We are particularly grateful to all the organizations that proactively engaged in the process – providing inputs and advocating for a robust Policy and Financing Package. We are also thankful to hundreds of civil society organizations, think tanks, and foundations across the world that engaged with Bank management and staff to share their views and recommendations as the process progressed through various platforms, as follows: (i) **IDA Forums** held in April, June and October 2021 were conversation spaces to update CSOs and hear their views on the proposed strategic directions, special themes and cross-cutting issues; (ii) **Bilateral engagements** held at the request of single or multiple organizations to discuss specific topics of interest to participating organization(s); (iii) **Monthly CSO calls** discussed inter-alia the Replenishment process; (iv) the **Friends of IDA Newsletter** regularly updated external stakeholders on IDA broadly, including IDA20; (v) **IDA20 Thematic Papers** shared through the IDA [website](#) and CSOs informed through email to ensure they are abreast of the technical analyses informing special themes and cross-cutting issues.

This consultative process ended with the invitation for public comments on the **IDA20 draft Deputies’ Report**, ahead of the Fourth and last Meeting on December 14-15, 2021. The public comment period ran from November 13-26, 2021. We thank the more than 20 organizations – of which 17 are global institutions - that provided extensive feedback contained in this report. Management thoroughly reviewed all comments and provided responses to each. Several comments informed some changes made in the Deputies’ Report. Overall, we are grateful for the broad support to the IDA20 themes, the suggestions around some policy commitments, and all the views on improving the consultation process.

GENERAL/ OVERALL COMMENTS

Organization	Comments	Response/Action
Bread for the World	<ul style="list-style-type: none"> • IDA20 should include policy commitments to support IDA countries in contributing to healthy diets by improving the affordability and accessibility of nutritious foods. • IDA20 should include specific policy commitments, under the themes of Climate Change and Jobs and Economic Transformation in particular, to support smallholder farmers in building resilience to climate shocks, and in facilitating market access. This policy commitment should be accompanied by an additional Tier 2 Indicator: the number of smallholder farmers and/or micro, small, and medium enterprises (MSMEs) provided with agricultural services. • IDA20 should include at least one specific policy commitment related to ensuring agricultural, nutrition, and social protection support that prioritizes the access of people from disadvantaged and vulnerable groups, as appropriate in each context. • The thresholds for the use of Crisis Response Window Early Response Financing resources should be revised to include the impacts of acute malnutrition. • A Tier 1 indicator should be added for prevalence of global acute malnutrition among children younger than 5. 	<p>Thank you for your comments and your support for a \$100 billion financing package.</p> <p>IDA20 is indeed addressing this concern. The Jobs and Economic Transformation Policy Commitment (PC) #5 addresses agricultural productivity, value chains and food security in ways that are inclusive even for small holder farmers. This policy commitment complements the commitment under Climate Change to support climate smart agriculture, and to make this explicit, the language was included “including through the promotion of climate smart agriculture”. The Deputies’ Report will further expand on the importance of smallholder farmers as part of the solution to the multiple challenges that IDA countries face.</p>

Organization	Comments	Response/Action
	<ul style="list-style-type: none"> The IDA20 replenishment should make the case for an ambitious financing package of \$100 billion. 	
SDG2 Advocacy Hub	<p>Thank you for the opportunity to provide feedback on the IDA20 Draft Deputies Report. Our comments are largely related to food security, nutrition, and agriculture.</p> <p>Some overarching reflections:</p> <p>While these issues are covered in the report and there are some related policy commitments, there is a surprising and disappointing lack of urgency to the challenges that IDA countries are facing in this area. For 6 years in a row, food insecurity has been rising. COVID-19 has compounded an already worrying trend. Without urgent action, we are likely to see a dramatic reversal in hard fought gains against maternal and child malnutrition.</p> <p>Rising food insecurity, malnutrition and poverty amongst smallholder farmers and rural populations reflect a confluence of contributing factors, including climate change, conflict, and more recently rising food prices. Climate change is already impacting food production and agriculture. IDA countries and smallholder farmers are on the frontlines. The near famine conditions in Madagascar are the first example of a climate change-induced food crisis—46 percent of the population is food insecure. There are not enough resources to respond to current humanitarian crises let alone those yet to come because of faster than anticipated impacts of climate change.</p> <p>In addition, many low- and middle-income countries are facing multiple burdens of malnutrition, including rising rates of overweight and obesity. Health systems in those countries are ill equipped to deal with the rise in diet-related diseases.</p> <p>IDA 20 is an opportunity to get ahead of these challenges in ways that tackle several interrelated challenges—improving access to healthy diets, the health, productivity and livelihoods of smallholder farmers, and agricultural sustainability. Coming on the heels of the UN Food Systems Summit, COP26, and the Nutrition for Growth Summit, the IDA 20 Replenishment is an opportunity to support IDA countries in advancing equitable, sustainable, and resilient food systems transformation.</p> <p>The current draft does not adequately respond to the transformational approach called for at this year’s Summits and does not reflect the importance and transformative potential of agriculture for IDA countries and for the poorest people in those countries. In fact, sentences like this one on page 3, para 6: (T)his reflects the disproportionate challenges IDA countries face, including climate, conflict, an unfinished structural agenda, inequality, governance and institutional weaknesses, as well as stagnant agricultural productivity and slow job transitions out of agriculture, all of which hamper inclusive growth,” project the opposite. Even as important as it is to prepare countries and their workforces for economies of the future, in the eight years to 2030, agriculture will remain the largest share of GDP and the largest source of employment for the majority of people who live in extreme poverty.</p>	<p>Thank you for your comments. We agree that food security, nutrition and agriculture are important aspects of IDA’s work as also reflected in the IDA20 package.</p> <p>Food and nutrition security has been an area of focus for IDA over the past decades. The World Bank is one of the largest sources of development finance targeting food insecurity, and IDA provided \$5.8 billion in new commitments during FY18-20 for agriculture and social protection to address short-term and longer-term drivers of food insecurity. In FY21, new commitments increased to \$10.6 billion. IDA’s nutrition portfolio has grown significantly from \$10 million in FY12 to \$770 million in FY21.</p> <p>The IDA20 package includes several elements to step-up our support in these areas. Under the <i>Human Capital</i> Special Theme, for instance, there is a policy commitment on investing in children’s early years (including through maternal and nutrition services). The <i>Climate Change</i> Special Theme includes a Policy Commitment to support countries facing natural hazards or food crises to improve their crisis preparedness and response capacity. The JET Special Theme includes a Policy Commitment on agriculture productivity, value chains and food security.</p> <p>It is worth noting that the IDA20 Policy Commitments do not represent the totality of IDA’s work. A December 2020 paper on “Responding to the Emerging Food Security Crisis” captures in more detail IDA’s overall support in this space through a complementary blend of short and longer-term measures to comprehensively transform the food system for food and nutrition security.</p>

Organization	Comments	Response/Action
	<p>The Ceres 2030 report points to ten evidence-based agricultural interventions that could end hunger and double livelihoods and productivity among small-scale food producers by 2030 with an additional investment of \$33 billion per year. IDA is the largest source of financing for low-income countries and dwarfs other financing mechanisms. IDA 20 policy commitments and the Deputies Report sets and signals policy priorities for the World Bank Group and IDA countries. We urge the deputies to use this opportunity to outline a transformative agenda for smallholder agriculture and local and national food systems.</p> <p>Specific comments:</p> <ul style="list-style-type: none"> • GAFSP not mentioned—expanding IDA’s partnership with GAFSP could leverage its direct engagement of smallholder farmers and farmer organizations • Smallholder farmers are only mentioned once in the gender section. It is unconscionable that the very people who produce a large share of food for their communities and regions, are themselves food insecure. It is important that smallholder farmers are seen as part of the solution to the multiple challenges that IDA countries face <p>Food security, nutrition and agriculture are relevant to the each of the three dimensions of the Green, Resilient and Inclusive Framework—this does not come through in the current draft.</p>	<p>On smallholder farmers, we will add a reference to this in Box 3.2 on Food and Nutrition Security (as per suggested edits by SDG2 Advocacy Hub under the Crisis Preparedness section).</p> <p>The report will expand on both stunting and obesity in Box 3.2, as well as on IDA’s relationship with GASFP.</p>
Partnership for Transparency	<p>Thank you for this opportunity to comment on the draft IDA20 Deputies’ Report which outlines a strong IDA20 financing package. Our comments relate to the improved effectiveness of IDA-funded operations resulting from citizen engagement (paragraphs 36 and 62 of the draft report) and build on the comments and suggestions we provided at the IDA CSO roundtable on October 6, 2021.</p> <p>Commendably, recent IDAs have included strong and growing commitments for citizen and CSO engagement (see the attachment at the end of this note). Expanding such engagement is necessary to address the twin challenges of effective implementation of the \$90 billion IDA20 package (the most ambitious IDA package so far) and ensuring that the money is well spent. Many IDA countries, especially in fragile and conflict-affected conditions, suffer from weak governing capacity and therefore rely on CSOs and NGOs to deliver their programs and help with monitoring and oversight of resource use.</p>	<p>Thank you for your comments, and for recognizing IDA’s strong and growing commitments to citizen and CSO engagement across the IDA cycles. We acknowledge the critical role that CSOs play particularly in FCV countries. At the country-level, CSOs are an integral part of multi-stakeholder consultations that inform the formulation of Systematic Country Diagnostics and Country Partnership Frameworks. At the project-level, CSOs play a crucial role in enhancing citizen engagement in Bank operations, for example, through facilitating beneficiary feedback loops, implementing community-driven approaches, conducting third-party monitoring, and increasing transparency and accountability—overall, contributing to better results and higher development impact on the ground. Consulting with beneficiaries throughout the project cycle is embedded within the new Environmental and Social Framework.</p>
Care International	IDA20’s replenishment comes in the midst of an ongoing and devastating global pandemic, which has exacerbated inequalities and reversed development progress by decades. At the same	Thank you for your comments, and for highlighting the impact the pandemic has had on gender equality,

Organization	Comments	Response/Action
	<p>time the world is grappling with protracted crises, from conflicts and climate change. IDA20 couldn't come at a more crucial time and holds incredible potential to turn the tide.</p> <ul style="list-style-type: none"> ➤ For the woman who has lost her livelihood as a result of the pandemic, with no access to safety nets, and struggling to feed her children. ➤ For the front-line healthcare workers, exposed to unsafe conditions and still waiting for vaccines to arrive in their communities. ➤ For the subsistence farmer no longer able to feed their family because of prolonged drought. ➤ For those living in conflict, who are facing the pandemic whilst livelihoods and healthcare facilities have been destroyed and coping mechanisms exhausted. ➤ For those women locked in at home with their abusers, experiencing the Shadow Pandemic of Gender Based Violence (GBV), unable to access support or flee to safety. <p>At a time where current crises have unravelled decades of progress and maintaining the usual pathways of action will not do the job, IDA20 holds hope.</p> <p>CARE welcomes IDA20's early replenishment as an opportunity to meet the increased financial need as governments all over the world over respond to, and try to recover from, the COVID-19 pandemic. We especially welcome the ongoing and expanded emphasis on gender equality in recognition of the fact women and girls are disproportionately impacted by all crises - especially those experiencing intersecting forms of discrimination. COVID-19 has been nothing short of catastrophic for women and girls. The Deputies Report provides hope that the rights and needs of women and girls will not fall through the cracks of policy interventions or remain invisible in policy design and data collection.</p> <p>IDA20 should therefore centre gender equality across the board: integrating a gender lens throughout, collecting and using sex-age-disability-disaggregated data, and strengthening women's and girls' leadership, in decision-making processes and crisis responses.</p> <p>Advancing gender equality is essential to rebuilding more equitable economies and societies and is a win-win: prioritising women and girls' economic opportunities can support a strong pandemic recovery and stimulate global gross domestic product (GDP) growth by US\$5 trillion. The cost of not acting, however, could be a US\$1 trillion decrease in global GDP by 2030, and would truly set back COVID recovery plans, not to mention worsening the life opportunities of millions of women and girls.</p> <p>The World Bank's focus on "Building Back Better from Crisis: Toward a Green, Inclusive and Resilient Future" is critical, and hugely welcome. IDA20 can lead to ground-breaking results,</p>	<p>acknowledging IDA's role and your commitment to play your part in putting gender equality at the center.</p>

Organization	Comments	Response/Action
	<p>ensure real value for money, and help get us back on track to tackle poverty and inequality, and achieve the Sustainable Development Goals. The key to success is prioritising and targeting the poorest and most marginalised groups, including women and girls, across IDA20. CARE stands ready to play our part to help build a green, inclusive and more resilient future, with gender-equality at its heart.</p>	
Eurodad	<p>Eurodad is disappointed with the content of the report “Building Back Better from the Crisis: Toward a Green, Resilient and Inclusive Future”, which is due for endorsement in mid-December. The document is not reflective of a consultative approach to decision making as it does not engage with, or even acknowledge the concerns, raised by Civil Society Organisations (CSOs). Eurodad has intervened in the IDA20 process by highlighting concerns related to the Special and Cross Cutting themes of Jobs and Economic Transformation (JET), Human Development, Debt and Climate Change.</p> <p>Some of our main policy recommendations, outlined in the position paper, focused on the need to ensure that IDA resources do not lead to privatisation of public services; effectively contribute to the structural transformation of low-income countries’ economies in line with sustainable development objectives; stop using IDA resources to subsidise International Finance Corporation’s operations through the Private Sector Window (PSW); contribute to debt cancellation; and apply a do no harm principle to climate related projects. We demonstrated that these policy recommendations are based on their harmful impact on the public interest which will exacerbate the on-going impact of the pandemic. Instead, the draft report continues to push for a growth-focused agenda rooted in the promotion of private finance and private sector interests, which casts doubts on the effective use of IDA funds. The indication of a possible increase in the size of the PSW without mentioning necessary safeguards and problems with demonstrating development additionality, as discussed by the Independent Evaluation Group, is extremely concerning.</p> <p>Moreover, Eurodad is also disappointed with the WB’s engagement with civil society in the IDA20 process. Although there were two online IDA Forums (June and October), opportunities for substantive exchange of views were limited. We question the value of this extremely superficial consultation process. Assuming that this can still impact on the outcomes, particularly having in mind that the IDA pledging meeting will take place in less than 20 days, we ask for clarity on how CSO’s written comments would be used in the finalisation of the IDA process.</p>	<p>Thank you for your overall feedback concerning CSO engagement during the replenishment process. We acknowledge your observations and note that the Deputies’ Report has significantly benefitted from different inputs from a wide range of CSOs, culminating in this public consultation draft which will be finalized after review of all comments received.</p> <p>With respect to the PSW, as of today, only one project has been on IDA’s balance sheet for longer than three years. Therefore, it would be too early to assess supported projects’ development impact through a formal IEG evaluation. IDA PSW leads the blended finance field in terms of governance and transparency, as confirmed also by the earlier IEG report. Also note that two representatives from IDA join all IFC and MIGA’s decision meetings for PSW proposals and opine on the good use of IDA’s resources, with a focus on economic rationale for subsidy utilization and minimum concessionality. In addition, the ultimate authority for the allocation of IDA PSW resources resides with the IDA Board. In IDA20, additional information on ex-ante impact assessment will be made public on an individual project basis, in addition to the already disclosed information on subsidies provided.</p>
Global Poverty Solutions	<p>First a big thank you for offering an opportunity for input into the IDA 20 policy package.</p> <p>We would like to present a number of recommendations, all based on one fundamental question: <i>What does IDA have to offer in exchange for a 20% increase in its budget from IDA 19?</i></p>	<p>Noted with thanks. Given the scarcity of donor resources, we agree that the question of value for money is a central one. In that regard, IDA’s hybrid financial model offers unique value for money among Multilateral Development Banks as it allows for mobilizing more than three dollars in IDA commitment authority for every one dollar in Partner contributions. A key attribute to IDA’s value</p>

Organization	Comments	Response/Action
	<p>From a very practical point of view, the premise of all analysis must be that IDA is undergoing its 20th replenishment at the same time as donor countries are facing very challenging fiscal situations and future projections for official development assistance has become very uncertain.</p> <p>The question of value for money is therefore central. A very quick analysis of what a more generously funded IDA would have to offer yields very paradoxical conclusions: it would appear to be offering less than in previous years. This submission proposes to reverse this lack of ambition, especially in the area of human capital.</p>	<p>proposition is the country-driven model, which drives results by targeting those who need it the most and achieves greater results. To underpin this, the IDA20 policy package is the most ambitious to date with more ambitious policy actions, including under the new Human Capital Special Theme, additional results indicators and increased targets, and a stronger focus on outcomes. For instance, the IDA20 Results Measurement System (RMS) is the most ambitious in the history of IDA. The RMS targets have been stretched, aiming to deliver more and better outcomes for the world's poor. A total of 15 new indicators have been added to the IDA20 RMS, including on climate and biodiversity, on crisis preparedness, and on disability and inequality. Furthermore, an assessment of IDA's country-level actions embedded under the Policy Commitments since IDA16 shows that these actions have doubled every replenishment since IDA17. With IDA20, country-level actions are expected to increase fivefold while keeping the level of donor contribution relatively stable.</p>
Oxfam International	<p>Oxfam maintains its call on donors to fully replenish IDA during this 20th replenishment round, supporting the world's poorest countries to access maximum concessional financing in the coming three years. In response to the October 2021 draft IDA20 policy package, we note some important progress and submit the below comments for consideration. In addition to the below comments, we wish to submit our original position paper on IDA20 as a contribution to this consultation process, as it continues to be relevant and includes more detail on many of the themes and recommendations below.</p> <p>CONSULTATION WITH CIVIL SOCIETY</p> <p>While we recognize that the Bank has made an effort to have discussions with civil society at various points throughout the IDA20 replenishment period, we wish to register our concern and dismay that the formal consultation process was not opened until a few weeks before final approval of the policy and financing package. We ask that the Bank commit to more formal and transparent forms of engagement with civil society in future replenishments, with papers disclosed ahead of IDA Deputies meetings; consultations happening at least twotimes during the replenishment process; and with more opportunity, time, and space for thematic discussions with the Bank's IDA team and thematic leads.</p>	<p>We thank Oxfam for its support for a strong IDA20 replenishment, and for sharing its position paper on IDA20. We have provided more detailed comments on the specific themes and recommendations in the sections below.</p> <p>Thank you for your feedback concerning timely CSO engagement during the replenishment process. We acknowledge your suggestions and note that the draft Deputies' Report has significantly benefitted from different inputs made by CSOs.</p>
Sightsavers	<p>Thank you for the opportunity to comment on the draft IDA20 draft Deputies' report and for engaging with civil society on this replenishment through the IDA forum. We also thank the IDA Deputies and Executive Directors who have taken on feedback from civil society</p>	<p>Thank you for your feedback concerning timely CSO engagement during the replenishment process. We</p>

Organization	Comments	Response/Action
	<p>throughout the process. We would suggest that in future rounds of IDA negotiations the public is given the opportunity to submit formal written comments at an earlier point in the process when there is more time for them to be considered.</p>	<p>acknowledge your suggestions and note the benefits of public input to the draft Deputies' Report.</p>
UNICEF	<p>It is with great pleasure that UNICEF submits comments on the IDA20 Deputies Report “Building Back Better from the Crisis: Toward a Green, Resilient and Inclusive Future” which recognizes the critical challenges IDA countries face as they respond to the pandemic and work toward a progressive recovery. The compounding factors of climate-related risks and conflict, socio-economic impacts, and the limited capacity to innovate to close existing gaps, particularly due to the rising public debt, all emphasize the importance of a robust IDA-20 replenishment.</p> <p>As a long-time partner for IDA, UNICEF’s strongly supports the IDA20 Deputies Report and its overarching theme of ensuring a green, resilient and inclusive recovery given the alignment with UNICEF’s recent Call for Action and new Strategic Plan for 2022-2025. These three elements must go hand in hand to effectively address the gaps highlighted by COVID-19 and support IDA countries in their efforts to build back better. We welcome the report’s reinforced focus on effectively reaching the poorest and most vulnerable, including those living in fragile and conflict settings. We appreciate the emphasis on the importance of investments in human capital for children, women, and families.</p> <p>For your consideration, below please find UNICEF’s consolidated comments which highlight the key areas of support and suggestions. We thank IDA for the excellent partnership and stand ready to support the World Bank and governments in the next IDA20 cycle.</p>	<p>We thank UNICEF for its long-standing partnership with the Bank, and its support for the IDA20 Deputies' Report and overarching strategic direction of the replenishment. We have provided more detailed responses to the comments/suggestions made in specific sections of this matrix.</p>
Wemos	<p>Thank you for the invitation to review the IDA20 draft Deputies' Report and provide comments. We are among the Civil Society Organisations that had offered points for consideration in the run-up to the Annual meetings in October via this position paper. With reference to the latest changes in the IDA20 policy framework proposal we have a couple of positive remarks, concerns and suggestions.</p>	<p>Noted with thanks. We appreciate the positive feedback, issues of concern and suggestions made. Detailed responses to these are provided in the respective sections of this matrix.</p>
Save the Children – focus on ACT-A	<p>The COVID-19 pandemic has brought to the fore the lack of readiness and resilience of health systems globally, particularly in resource poor settings. The recent past has highlighted the fragmented nature of the system, affecting countries global health security capabilities, disrupting routine health care provision and the strides taken towards ensuring universal health coverage¹. It has been estimated, since the onset of the pandemic, for each COVID-19 related death, more than two women and children have lost their lives due to preventable reasons – as result to disruptions to health systems².</p>	<p>Thank you for your observations on the need to focus on the future in areas of human capital. We have provided more detailed comments in the respective subsection below.</p>

¹ [https://www.thelancet.com/article/S0140-6736\(20\)32228-5/fulltext](https://www.thelancet.com/article/S0140-6736(20)32228-5/fulltext)

² Global Financing Facility, Emerging data estimates that for each COVID-19 death, more than two women and children have lost their lives as a result of disruptions to health systems since the start of the pandemic (press release)

Organization	Comments	Response/Action
	<p>With increases in demand for healthcare, both COVID-19 related and other essential services, the demand has not been met the required resources to meet this demand. With a contraction in the global economy, national governments fiscal capacity to invest in health has been impacted, as has the appetite of donors to provide the necessary financing to build pandemic proof health systems.</p> <p>It is essential that the investments the financing for this pandemic, pays dividends far into the future and contribute to strengthening health systems. In addition, it is important global health institutions ensure they play a key role in supporting and pushing for health systems strengthening and pandemic preparedness gains through disease specific programmes such as ACT-A. By doing so the global community would ensure the limited resources that are made available ensure benefits that are sustainable in the long run.</p> <p>ACT- Accelerator</p> <p>ACT-A has been providing support for the provision of COVID-19 tools for countries, albeit in a silo'd nature, with specific global health institutions working on each of the ACT-A pillars. There are currently four pillars; Vaccines, Therapeutic, Diagnostics and the Health System and Response Connector (HSRC). To date, the majority of the funding has gone towards the vaccines pillar, albeit less than what is needed, and pillars such as the HSRC seemingly further deprioritised. This is the pillar the World Bank co-leads on. Furthermore, the shift in the ACT-A HSRC strategy, as per the strategic plan, begs the question whether the connector is providing as much support to health systems as the title suggests.</p>	<p>Thank you for noting the partnership between the World Bank and ACT-A in providing COVID-19 tools. For additional comments, particularly on the HSRC, please refer to the response to Save the Children's additional comments.</p>

IDA'S COMPARATIVE ADVANTAGE

Organization	Comments	Response/Action
ODI – A Global Affairs Think Tank	<ul style="list-style-type: none"> • Assessing private finance leverage: There is no doubt that the introduction of the PSW has leveraged private finance and this is an important argument for allocating to the PSW but the leverage impact should not be overestimated. On p. 16 a leverage ratio of 6.2 is claimed. However, this includes \$1bn of own account investment of IFC and MIGA (part of the WBG), this money is not new (it would have been invested by the IFC and MIGA anyway), it is not private finance mobilised and is not additional. It is potentially misleading therefore to include this \$1bn of IFC and MIGA investment as private finance mobilised to arrive at a leverage ratio of 6.2, which as presented implies that \$1 of PSW investment mobilised \$6.2 in private investment. This is not the case. \$0.6bn of PSW investment, co-invested with \$1bn IFC and MIGA own account resources, mobilised \$2bn in private investment resulting in a leverage ratio of 1.9. This is an important point to flag as it may influence the potential allocation to the PSW if its effect is overestimated. 	We thank you for your observations on PSW's overall mobilization. While it is correct that funding from other MDBs generally should not be counted towards the gross amount of mobilization induced by concessional financing, the case of PSW is unique. This is because PSW supports IFC's investments which would <i>not</i> otherwise go forward, either because of credit, liquidity, political or foreign exchange devaluation risks. Under IDA19, \$742 million in PSW resources have supported \$1.4 billion of IFC+MIGA investments/guarantees and \$3.7 billion of additional financing. Therefore, we can confidently say that every dollar of PSW mobilizes 5x in additional private financing and almost 7x the amount, if we also count IFC and MIGA's own investments/guarantees.
Youth Initiative for The Promotion of Good Leadership	IDA should continue to broaden and deepen partnership with a spectrum of Actor and Partner with international Organization multilateral and bilateral partner in mitigating climate change, Gender and development, fragility, conflict and violence and Job economic transformative as well as cross cutting issues of debt and Technology.	Thank you for your comment. IDA's work involves partnerships. IDA will continue to strengthen its partnerships with a broad range of development actors focusing on specific development priorities and considering country specific circumstances.

IDA20 POLICY PACKAGE

Overall

Organization	Comments	Response/Action
Bank Information Center	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 increased detail is needed for several indicators and policy commitments. Therefore, we encourage IDA to address these critical gaps before the draft is finalized. Below are priority areas we would like to see strengthened to deliver on the overarching theme of IDA20, "Build Back Better," and work toward an ambitious, inclusive, and green recovery.	Thank you for sharing your comments. We have addressed them in the corresponding sections below.
Bread for the World	<p>Disadvantaged and Vulnerable Groups</p> <p>Bread welcomes the report's focus, particularly in Box 3.1, on inclusion of disadvantaged and vulnerable groups, especially the emphases on boosting agricultural productivity, developing value chains, and ensuring food security for individuals who are members of such groups. These</p>	Thank you. Inclusion is indeed a central theme in the IDA20 policy package, and we fully agree with the importance of supporting disadvantaged and vulnerable groups in interventions related to agriculture, nutrition, and social protection. This is a key objective of IDA's

Organization	Comments	Response/Action
	<p>include people living with extreme poverty, displaced people, people in other fragile contexts, members of minority ethnic groups, people with disabilities, and people at risk of discrimination based on age, race, religion, sexual orientation, and/or gender identity. We welcome the several policy commitments related to gender and disability inclusion. However, IDA20 should include at least one specific policy commitment related to ensuring support in the areas of agriculture, nutrition, and social protection that prioritizes access for people in marginalized groups, as appropriate to each context.</p>	<p>support and is also reflected in the policy commitments, which specify that IDA <i>inter alia</i> will support agriculture productivity, value chains and food security under the JET Special Theme; increase investments in climate adaptation and mitigation in food and agriculture transition systems under the Climate Change Special Theme; and support social protection for urban informal workers as well as expand adaptive social protection and build resilience to shocks under the Human Capital Special Theme. The Deputies' Report will specify that the commitments related to social protection will include a special focus on the poorest, most vulnerable, and underserved populations.</p>
<p>Youth Initiative for The Promotion of Good Leadership</p>	<p>IDA should be committed more on intervention on countries that are less developed on Climate change, conflict, natural disasters and food insecurity. Support to Poor and vulnerable people, food supplies to the vulnerable poorest household and informal business.</p>	<p>Thank you for your comment. The IDA20 policy package reaffirms the commitment of the international community to scaling up support to the poorest and the most vulnerable countries - helping them respond to the ongoing COVID-19 pandemic, and address key development challenges including, but not limited to, climate change, food insecurity, and conflict.</p>
<p>Global Coalition on Social Protection Floors</p>	<p>The Global Coalition for Social Protection Floors (GCSPF) reiterates the message and detailed proposals that were presented in an earlier document: IDA20 should support countries' efforts to implement social protection floors, rather than targeted social safety nets.</p>	<p>Thank you for your comment. We have addressed it in more detail in the respective section below.</p>
<p>Ad hoc Group on IDA20</p>	<p>Having analysed the Report from the Executive Directors of the International Development Association (IDA) to the Board of Governors, we regret to see that none our suggestions are reflected in the policy commitments nor in the results measurement system. While “progressive universalism” is mentioned in the narrative text of the report, the policy commitments and the results measurement system regarding social protection, which are the elements to which IDA will be held accountable, have remained unchanged.</p> <p>Additionally, the report provides no definition of the concept of “progressive universalism”, nor any explanation of how universal social protection can be reached other than through social protection floors.</p> <p>We therefore find that the World Bank (WB) is not truly committing to the effective realization of the human right to social protection, through the establishment of universal social protection floors.</p> <p>Social protection floors are a set of universal guarantees including access to essential health care and basic income security for children (providing access to nutrition, education, care and any other necessary goods and services, including for children with disabilities), persons in active</p>	<p>Thank you for sharing your comments.</p> <p>The World Bank is fully committed to universal social protection. Ensuring access to social assistance or social insurance or a combination thereof to those who need support, when they need that support, is central to the Bank's goals of ending poverty and boosting shared prosperity. The World Bank and IDA20 will continue to devote attention first to those at the bottom of the income distribution or otherwise marginalized – ensuring they have priority access where social protection is limited. Universality and targeting are not mutually exclusive, and that the latter can help ensure that the former is achieved in full. The journey toward universality will necessarily be progressive and realized over time. Countries have hard choices to make and the pace of scale up has to take into account the trade-offs that invariably emerge in terms of fiscal, institutional and delivery capacity. Since the</p>

Organization	Comments	Response/Action
	<p>age (in particular in cases of sickness, unemployment, maternity and disability) and older persons.</p> <p>In the International Labour Organization’s (ILO) recommendation 202 on national floors of social protection, SDG target 1.3 on social protection systems, and 5.4 on gender equality, all countries have agreed to implement social protection systems, including floors. After COVID-19 has stressed the importance of social protection and the urgency of achieving universal social protection, including floors, IDA-20 should adopt specific and bold commitments toward this end.</p>	<p>COVID-19 outbreak, the need for social protection has increased, and IDA has responded. Since spring 2020, IDA has provided \$5.3 billion in new Social Protection financing for COVID-response alone. Even more has been provided through restructuring of existing projects, supporting health projects as well as through development policy operations.</p> <p>Please also refer to our response to your specific comments under Human Capital.</p>
Leadership Collaborative to End Ultra-Poverty	<p>Two months ago and again earlier today, we wrote to all IDA Deputies, as members and allies of the NGO Collaborative (now called the Leadership Collaborative to End Ultra-Poverty). Our group supports and promotes economic inclusion to reach SDG 1 through a “big push” of coordinated interventions, such as cash or in-kind transfers, skills training, coaching, access to financial services and linkages to market. We are writing today in response to the recent draft of the IDA Executive Directors’ Report.</p> <p>We are encouraged to see an increase (from 30 to 35) in the number of economic inclusion projects that will have a component directed at women. We also welcome the World Bank’s commitment to progressive universalism, starting with interventions that target the poorest and most marginalised segments of society (paragraph 88). Similarly, we also note that in paragraph 123 that the Bank intends to reach “especially the poorest” in its planned economic inclusion initiatives for women.</p> <p>While we applaud the approach referenced in these two paragraphs, we are concerned that the intention will be lost if it is not explicitly included in the wording of the policy commitment.</p> <p><i>Therefore, we request that in the wording of the policy commitments on adaptive social protection (Human Capital No. 4) and economic inclusion (Gender and Development No. 2) the World Bank commit to using measurable approaches to ensure IDA does not inadvertently leave behind the most vulnerable and marginalised segments. This could be achieved through modest adaptations to the language, for example through the addition of the following underlined phrases:</i></p>	Thank you for sharing your comments. We have addressed the specific requests on policy commitments (Human Capital #4 and Gender and Development #2) in the corresponding sections below
Care International	<p>CARE recommends three game-changing priorities for IDA20, to truly ensure this early replenishment helps shift the dial for COVID-19 recovery, and paves the way for a green, resilient and inclusive future. IDA20 should incorporate these, both in its overall strategic priorities and in regard to resource allocation. The World Bank should:</p> <ol style="list-style-type: none"> Lead the way on gender-equitable recovery from COVID-19 by prioritising gender equality and progress for the most marginalised groups across the IDA portfolio. This will require the Bank to significantly increase its ambition to build 	Thank you for sharing your comments. We have addressed them in the corresponding sections below.

Organization	Comments	Response/Action
	<p>the care economy and address GBV. IDA20 can set the bar high for global action that ensures we Build Back Better, but it requires matching unprecedented need with unprecedented action. Ambitious action on unpaid care could be a game-changer when it comes to building the care economy, the corner stone for equitable opportunities for women and girls. And tackling GBV head on could end one of the biggest human rights violations faced by women and girls that prevents their full participation in public life.</p> <p>2. Integrate a focus on gender equality across COVID recovery, crisis preparedness and response. This includes integrating an intersectional, needs-based lens into all of IDA’s crisis preparedness and response work, rather than a “one size fits all approach”. To further counter the disproportionate impact of crises on women and girls, IDA should ensure that systematic gender analysis informs crisis action, preparedness and response efforts. This includes scaling up public financing for crisis preparedness and response, with a focus on gender equality.</p> <p>3. Strengthen women’s and girls’ leadership across IDA20: Women and girls and the organisations that represent them should be at the centre of all decision-making processes that will impact their lives, especially when it comes to COVID-19 response plans and processes to ‘build back better’. Priority should be placed on strengthening leadership from diverse groups of women, including those experiencing intersecting forms of discrimination. This includes providing funding for women-led and women’s rights organisations as agents of change, gender-related institutions, and implementation of gender national plans and policies in IDA countries.</p>	
Open Data Watch	<p>On behalf of Open Data Watch (ODW), I’d like to thank you for sharing this report and to send along our comments.</p> <p>As an organization working at the intersection of open data and official statistics, we appreciate the importance of sustainable funding for statistics and data to help policymakers address development challenges and leave no one behind. As shown by recent publications, such as PARIS21’s PRESS³, funding for statistics and data are not sufficient to support the implementation of Agenda2030, as described by the Cape Town Global Action Plan for Sustainable Development Data (CTGAP)⁴. This conclusion is also echoed by our work with Data2X on gender data financing⁵, which finds that contributions by government and external partners must double to build strong gender data systems by 2030.</p> <p>We were therefore heartened to see that support to statistical capacity building is part of the IDA20 Deputies’ Report. IDA plays a crucial role in supporting poor countries to build strong institutions and statistical capacity has an important part to play. We support the report’s three</p>	<p>Thank you for your feedback and for highlighting the important linkages between data and policy-making. Indeed, our 2021 World Development Report (<i>Data for Better Lives</i>) underscores, among other things, how governments can use data to improve programs, policies, and the targeting of scarce resources to marginalized people and areas; as well as how individuals, empowered by data, can make better decisions and hold governments accountable. The WDR also calls for creating more equitable access to the benefits of data between people and between countries. In line with the findings of the WDR, our support for statistical capacity building in IDA countries will address the need for more equitable access</p>

³ PARIS21. 2021. The Partner Report on Support to Statistics – PRESS 2021. <https://paris21.org/press2021>

⁴ United Nations Statistics Division. 2017. Cape Town Global Action Plan for Sustainable Development Data. <https://unstats.un.org/sdgs/hlg/cape-town-global-action-plan/>

⁵ Open Data Watch, Data2X. 2021. State of Gender Data Financing 2021. <https://opendatawatch.com/publications/state-of-gender-data-financing-2021/>

Organization	Comments	Response/Action
	<p>policy commitments on Jobs and Economic Transformation to support statistical systems, on Climate Change to improve climate data and information services, and on Governance and Institutions to improve debt transparency. We emphasize the importance, noted in parts of the report, of building strong core data systems that provide sex-disaggregated data and other disaggregations, including on age and disability status.</p> <p>We also call for support to build data systems that yield open data. Our most recent Open Data Inventory (ODIN) Report⁶ finds that while progress is being made on open data overall, this progress is not even and low-income countries in particular struggle with open data systems, which hinder data's impact through use in decision-making. Translating data into effective policymaking through data use is also an area of significant underinvestment so far and we recommend that data and policy linkages are emphasized in IDA's statistical capacity support.</p>	<p>to data as well as using data for more effective policy-making and enhancing accountability of governments,</p>
Sightsavers	<p>The IDA20 Deputies report rightly acknowledges that people with disabilities do not benefit equally from development progress and have been disproportionately impacted by COVID-19. As previously expressed, we are concerned that disability inclusion will be de-prioritised in IDA20 due to the decision to not include it as a cross-cutting issue or a Special Theme. While we still believe this is a risk, which the World Bank should be cognisant of as IDA20 is implemented, we welcome the strengthened language, the additional RMS indicator, and the clearer commitment to disability in this version of the draft Deputies report which go some way to addressing this concern. We also welcome the increased emphasis on Universal Health Coverage and Inclusive Health Systems within the Human Capital Special Theme.</p> <p>We have included below a number of suggestions where disability could be further strengthened to ensure that IDA20 is effectively promoting a green, resilient and inclusive recovery from COVID-19 and that it builds on the progress made through IDA19, the ESF and the World Bank's Global Disability Summit commitments.</p>	<p>Thank you for these suggestions and continued attention to the work towards equity for persons with disabilities. We think IDA should continue to play an important role in ensuring equal access to development benefits, in addressing constraints, as well as in enabling new opportunities for persons with disability.</p> <p>This is why, building on the foundation laid in IDA19, IDA20 will go deeper by adopting a standalone Policy Commitment, while – with the guiding principle of universal access to benefits from projects across sectors – scaling up support to disability inclusion across IDA's Special Themes and Cross-Cutting Issues. The new standalone Policy Commitment will address the needs of persons with disabilities by implementing the principles of universal access through projects across sectors. IDA20 will also help countries build further statistical capacity to enable the disaggregation of household surveys – a longstanding constraint that goes beyond disability inclusion (e.g. with important impact for closing gaps between women and men).</p> <p>These activities are additional to the foundational provisions for universal access to Bank-supported operations laid out in the World Bank's Environmental and Social Framework. They are also additional to the Ten Commitments on Disability Inclusive Development made at the 2018 Global Disability Summit, which help</p>

⁶ Open Data Watch. 2021. Open Data Inventory 2020/21 Annual Report. <https://odin.opendatawatch.com/Report/annualReport2020>

Organization	Comments	Response/Action
		safeguard against discrimination and move the agenda forward on agendas that are key for the inclusion of persons with disabilities.

Cross Cutting Issue: Crisis Preparedness

Organization	Comments	Response/Action
SDG2 Advocacy Hub	<p>Page 26, Box 3.2—Food and Nutrition Security</p> <ul style="list-style-type: none"> It is great to see this text box. However, it is unfortunate that it is placed in the crisis preparedness section, which suggests that it is just a humanitarian issue. In fact, investing in food and nutrition security and agriculture are also or can be foundational investments in building back better, strengthening resilience, greening the economy and unleashing economic growth, as recognized in the text. Paragraph 1: the data cited has been updated. The Standing Together for Nutrition Coalition’s modelling suggests that the pessimistic scenario is more likely: https://static1.squarespace.com/static/5fc228ec616251320838493c/t/60f58b511ad9bflc32cf264c/1626704722293/ST4N+Nature+Food+Press+Release+July+17+FINAL.pdf and the citation for footnote a should be the Nature article: https://www.nature.com/articles/s43016-021-00319-4 In paragraph 3: would be strengthened by adding the highlighted language in point (i).. And support programs to improve the livelihoods of smallholder farmers and farm workers and accelerate transition to more inclusive, productive.... Then in point (ii) add ...a more diverse and nutritious mix <p>Page 29, para 53: Consider adding the Famine Action Mechanism (FAM) here as well—for a more comprehensive view of crises.</p>	<p>Thank you. The report will include language of the role of food and nutrition security investments to build back better, including through strengthening resilience, greening the economy and galvanizing economic growth.</p> <p>Thank you. We will update the numbers and footnote in paragraph 1. The report will also include language to highlight that investments in food and nutrition security (including tackling both stunting and obesity) are critical for building back better, such as via rebuilding human capital and galvanizing economic growth.</p> <p>Thank you. The language suggestions are well noted.</p> <p>Thank you. While the paragraph might not do justice to the many partnerships that IDA is involved in, it is meant to illustrate examples of partnerships and is not intended to serve as a comprehensive list of such engagements or types of crises.</p>
Care International	<p>In the midst of a devastating global pandemic, with complex protracted crises caused by conflict and climate change affecting millions of people at the same time, IDA20’s focus on crisis preparedness couldn’t be more crucial. To ensure crisis preparedness is as effective as possible and lessens impacts for the most vulnerable, IDA should be integrating a focus on gender equality across its crisis preparedness and response policies. Crisis preparedness measures are only effective if they are inclusive and timely.</p>	<p>Thank you for the thoughtful suggestions. Crisis Preparedness is a cross-cutting issue which intersects with various IDA20 Special Themes. As noted in paragraph 56 of the draft Deputies’ Report, “<i>Under the Gender and Development Special Theme, IDA20 will help countries incorporate productive economic</i></p>

Organization	Comments	Response/Action
	<p>As the Deputies Report accurately states, women have faced higher job losses than men, had access to fewer safety nets to lessen the impact, and have taken on most of the unpaid care duties resulting from greater need amongst the sick, elderly, and children. This disproportionate impact on women and girls is true for all types of crises. Humanitarian crises increase the vulnerability of women and girls to GBV. Climate-change induced crises and food insecurity further affect them disproportionately: women and girls represent more than 70 percent of people facing chronic hunger.</p> <p>Specifically, IDA20 should:</p> <ol style="list-style-type: none"> 1. Integrate a focus on gender-equality across its crisis preparedness. This includes ensuring crisis preparedness measures are inclusive and timely, by integrating an intersectional, needs-based lens into all of IDA’s crisis preparedness and response work, rather than a “one size fits all approach”. IDA needs to be ready to quickly pivot and produce poverty assessments when necessary, to better respond to and prepare for emergencies, and should complement measures with the systematic use of rapid gender assessments. 2. To counter the gendered impacts of crises of all kinds, IDA should ensure that regular gender analysis informs crisis action, preparedness and response efforts. This includes scaling up public financing for crisis preparedness and response, with a focus on gender justice. It also requires collaborating with, and funding, women, youth and gender-focused organisations that are responding to crises, thereby enabling their equal and meaningful participation in prevention and response efforts. 3. On climate change and food and nutrition security specifically, IDA should invest in preventing climate-induced disasters and responding better to early warning signs. This includes increasing investment in gender-responsive early warning systems, disaster risk reduction, and community-based adaptations. Anticipatory action can both prevent climate-induced disasters, which often lead to increased food insecurity, and strengthen national and local actors’ capacity in these critical areas of intervention. 	<p><i>inclusion programs, which can support women in climate-affected sectors like agriculture, forestry, and fisheries to adapt with more resilient skills and knowledge for sustainable livelihoods. Relatedly, IDA20 will also work towards expanding women’s land rights through World Bank operations in post disaster reconstruction and recovery, supporting crisis preparedness where possible.”</i></p> <p>The Deputies’ Report will expand on IDA’s endeavor to close the gaps between women and men as part of IDA’s comparative advantages and its work under Crisis Preparedness. This will allow us to work out the implementation details through the course of the IDA20 cycle.</p>
Save the Children – Richard Watts	<p>We welcome the acknowledgement that the risks of crisis situations in IDA eligible countries in areas such as health, environment and economic spheres are increasing, and the decision to include crisis preparedness as a cross cutting issue within IDA20 is therefore important. In addition, it is good to see the commitment to support all IDA eligible countries with crisis preparedness, as well as an ambition to increase the resourcing of the Crisis Response Window (CRW). However, whilst in principle we welcome the development of the crisis toolkit to support government, we have concerns about the technical and resource capacities to develop the necessary assessments and analysis, which could impact eligibility to access IDA resources, such as the CRW. Therefore, it will be critical to assess the toolkit’s implementation through IDA20, and adapt based on challenges encountered by both the World Bank and governments, to ensure resources are disbursed in a timely fashion and used as effectively and efficiently as possible.</p>	<p>Thank you. Indeed, it is important that countries have the capacities to conduct crisis preparedness assessments. Regarding the forthcoming Crisis Preparedness Gap Analysis (CPGA), as is the case with any new diagnostic tool, IDA will adapt based on its experience and learn by doing. As for eligibility to access IDA resources such as the CRW, we wish to clarify that it is not proposed to link such access to whether or not a country has conducted a CPGA. The CPGA will be demand-based, and its purpose is to help identify key preparedness gaps, galvanize dialogue with clients, and inform country</p>

Organization	Comments	Response/Action
		programming. Eligibility for the CRW is based on criteria such as crisis severity, burden share, etc.

Cross Cutting Issue: Governance and Institutions

Organization	Comments	Response/Action
Partnership for Transparency	<p>We are encouraged to see that in a recent report to the Board (paragraph 70), World Bank Group Management states: “In response to IEG’s recommendations, the Bank and IFC have taken steps to build more impactful and efficient approaches to engaging with citizens and clients, including through enhanced diagnostics, training, systems, and digital platforms.”</p> <p>In contrast, IDA20 seems to take a step back from commitments included in prior IDA replenishments as it does not outline actions needed to expand the role of citizen and CSOs engagement in assuring IDA20’s effectiveness. To remedy this, in our view, two basic issues call for IDA deputies’ attention and actions.</p> <p>First, IDA has reported that citizen engagement (CE) activities are included in the design of almost all projects funded by IDA since 2016 (thanks to the strong commitments and targets in IDA17-19). The necessary next step is to comprehensively report on the extent of actual implementation of citizen/CSO engagement over the last 5-6 years, how the feedback collected is used, and outcomes achieved as a result. Strengthened monitoring of citizen engagement was recommended by the Independent Evaluation Group in 2017 and promised in IDA19. Such reporting is essential for transparency, accountability, learning, development effectiveness, and moving forward. This should be highlighted in the IDA deputies’ report.</p> <p>Second, we welcome the affirmation (paragraph 62 of the draft report) that “<i>IDA will seek to foster more inclusive governance by strengthening platforms for greater social accountability and citizen engagement.</i>” However, greater clarity is required as to how this will be done and the specific actions that will be taken to achieve this, as has been done in recent IDA replenishments (see attachment).</p> <p>To address these issues, we respectfully suggest that the commitment in para 62 of the report to foster “<i>greater social accountability and citizen engagement</i>” should be strengthened by adding the following specific actions:</p> <p>(a) IDA will review and share <i>how</i> citizen and CSO engagement commitments under the recent IDAs have been implemented, outcomes achieved, and lessons learned by the end of CY22; and,</p> <p>(b) building on the 2018 IEG evaluation and other recent developments (such as adoption of the Environment and Social Framework), the 2014 citizen/CSO engagement framework should be updated, no later than IDA20 mid-term review. This update would provide a basis for expanded citizen/CSO engagement in service delivery and strengthened feedback loops, as well as</p>	<p>IDA remains committed to strengthening platforms for greater social accountability and citizen engagement. Per the strategic framework on citizen/CSO engagement adopted in 2014, all investment Project Financing operations financed by the World Bank are required to meet the following three conditions: (i) project design must be citizen-oriented; (ii) projects’ results frameworks must include at least one beneficiary feedback indicator to monitor citizen engagement throughout project implementation; and (iii) projects must report on the beneficiary feedback indicator(s) by the third year of implementation.</p> <p>The Bank monitors and reports on these targets on a quarterly basis for projects approved since July 2015. Results are published in the Corporate Scorecard, at https://scorecard.worldbank.org/. There has been significant progress on this; for example, 99% of IPFs approved in FY20 had a citizen-oriented design compared to the baseline of 60 percent in FY14.</p> <p>Development Policy Financing (DPFs) operations have also included measures for enhancing citizen engagement, for example, through the adoption of national legislation on participatory budgeting or procurement monitoring. Citizen engagement is also facilitated through certain IDA Policy Commitments and the IDA RMS. For example, IDA19 committed to supporting at least 50 percent of IDA countries to establish and strengthen platforms for engaging with multiple stakeholders, including women as well as vulnerable groups, in policy making and implementation to enhance public participation, accountability and responsiveness. The IDA19 RMS tracks the percentage of projects with beneficiary feedback at design.</p>

Organization	Comments	Response/Action
	<p>strengthened roles for CSOs and citizens in monitoring and oversight of implementation of IDA20-funded operations. Such a review would include consideration of how engagement can be adequately financed.</p>	<p>Considering the present focus of IDA20 on building back better, there was a need to improve the specificity of the IDA19 Citizen Engagement commitment. Accordingly, for IDA20, the focus and ambition of the Citizen Engagement commitment will be sharpened and increased, respectively, through a new commitment to mainstream gender-responsive budgeting. Specifically, IDA20 will encourage greater citizen participation, accountability, and responsiveness by supporting institutional reforms that mainstream principles of gender equity and social inclusion into the management of public finance. Given the lessons learned from IDA19 about the challenges associated with measuring the broad concept of multi-stakeholder engagement, the proposed approach demonstrates selectivity for a more targeted response to the most pressing challenges of IDA countries.</p> <p>Even so, IDA is open to conducting a timely review of the IDA19 commitment on the impact of the multistakeholder platforms and other World Bank efforts to enhance CSO engagement and multistakeholder platforms.</p>
<p>ODI – A Global Affairs Think Tank</p>	<ul style="list-style-type: none"> • We agree that DRM will be important to IDA countries for generating additional fiscal space to fund crisis response and recovery, including investments in human capital and green infrastructure and encouraging sustainable economic transformation. <i>The extent to which countries can raise significant revenues, however, will likely be limited, at least initially, so IDA should initially focus on instruments that are more targeted and temporary, such as direct income taxes, solidarity or wealth taxes, or more permanent ways of expanding tax bases by removing wasteful tax expenditures that are poorly targeted towards those most vulnerable. This will be important to minimise the negative impact of increased taxes on economic recovery and to ensure that the burden of additional tax is distributed fairly.</i>⁷ • We welcome support for policy reforms that enhance progressivity to improve income and wealth redistribution and create inclusive economies. However, <i>the proposal should be more realistic about the capacity of tax systems in IDA countries to achieve income and wealth redistribution.</i> Many IDA countries have a relatively narrow tax base for direct taxes, and that evidence suggests their role in redistribution is likely to be limited in the 	<p>Thank you for your comment, and for highlighting the importance of DRM efforts that are equitable and fair. IDA intends to support tax measures that are progressive.</p> <p>We agree that in general the impact of the broader tax and spending policies is what matters overall. However, many IDA countries lack targeted spending mechanisms such as direct transfers. While these mechanisms are being established, there is a prevailing and urgent need to work</p>

⁷ [Using the tax system to support recovery from COVID-19 | Taxdev and Well-designed tax policy reforms are key to successful post-COVID fiscal consolidation in Africa | Taxdev](#)

Organization	Comments	Response/Action
	<p>short term.⁸ In addition, it is important to bear in mind the much stronger redistributive potential of social spending. A more realistic aim could be to raise revenues most efficiently and equitably, acknowledging that where revenue mobilisation is the priority, not all taxes need to be progressive, and some instruments can be efficient at raising revenues that can in turn finance equalising and pro-poor spending. In this sense, it is important to consider that what matters is the distributional and poverty impact of the system of taxes and spending as a whole.</p> <ul style="list-style-type: none"> • In line with this, Indicator 36 in the Results Measurement System (RMS) ‘Number of countries with increased tax fairness and progressivity’ should be replaced with an indicator aligned with SDG Indicator 10.4.2 ‘Redistributive impact of fiscal policy’, which has been championed by the World Bank.⁹ This indicator also has the advantage of being based on the Gini coefficient, thus directly connecting the effect of fiscal policy decisions to RMS Indicator 4. • <i>Support for countries to report and review the effectiveness of tax expenditures across tax instruments</i> should be mentioned explicitly. Reform in this area will be key for supporting the aim of creating simple, neutral, fair and transparent tax systems, as well as holding some potential for additional revenue mobilisation. • We welcome IDA support for the modernisation of administrative tax systems and strengthening tax compliance. <i>Investments in technology and digitalisation should also be accompanied by behaviour change management to ensure systems are used at their potential.</i> This includes strengthening procedures to harness technology more effectively, paying attention to the importance of the integrity of taxpayer data, for example, as well as a greater emphasis on taxpayer education and support tailored to the local context. 	<p>on the tax side in the interim and encourage reforms where clear options for greater progressivity are available.</p> <p>Ideally, we would like to have both measures. Both the tax as well as the spending side needs to contribute towards redistribution. Indicator #36 is measuring the redistributive effect of only the tax side, as we find that introducing progressive tax measures is critical and needs to be tracked separately as some information is lost in tracking the effect of the tax and spending impacts together.</p> <p>We agree that reforming tax expenditures is an important tool for progressive tax reform.</p> <p>We are actively incorporating behavioral tools in our tax projects for better tax compliance.</p>
Oxfam International	<p>DOMESTIC RESOURCE MOBILIZATION (DRM)</p> <p>In the past decade, taxation of wealth, high-net worth individuals and corporations has been in decline while the burden on households has increased by close to 30 percent. This trend has accelerated during the pandemic and will remain a core challenge through the IDA20 period. The World Bank and IDA20 commitments should be focused on reversing this trend. We are pleased to see equitable (fair and progressive) revenue policies mentioned, but</p>	<p>Noted with thanks. We take the opportunity to highlight that greater taxation of capital income is an important part of the World Bank’s strategy towards progressive tax reform. A progressive tax policy includes a number of different sources of capital taxation, which we believe are not restricted to the ones proposed in the revisions of the policy commitment. As such, we recommend keeping the</p>

⁸ [Using the tax system to support recovery from COVID-19 | Taxdev and Well-designed tax policy reforms are key to successful post-COVID fiscal consolidation in Africa | Taxdev](#)

⁹ The redistributive impact of fiscal policy indicator: A new global standard for assessing government effectiveness in tackling inequality within the SDG framework’, World Bank blog, June 11, 2020 <https://blogs.worldbank.org/opendata/redistributive-impact-fiscal-policy-indicator-new-global-standard- assessing-government>

Organization	Comments	Response/Action
	<p>the DRM commitment should specify the progressive revenue policies and be accompanied by a corresponding qualitative RMS indicator.</p> <ul style="list-style-type: none"> • Accordingly, we recommend revisions (in red) to the DRM policy commitment under the Governance and Institutions Special Theme: <p><i>Improving domestic resource mobilization:</i> Support 15 IDA countries to bolster their domestic resource mobilization capacity through equitable (fair and progressive) revenue policies (as verified using fiscal incidence analysis or other methods) <i>that increase taxation of multinational companies, capital gains, property and wealth</i> toward achieving <i>country-owned tax-GDP targets ratio of at least 15 percent</i> in the medium term.</p>	<p>commitment broad and as it is, noting again that a high taxation of capital income is a key pillar of a progressive tax system.</p>
<p>Save the Children – Richard Watts</p>	<p>IDA funding plays a substantial role in supporting domestic revenue mobilisation (DRM) efforts. In 2019 it provided over 50% of total ODA for DRM. With the current bleak prospects for increasing domestic public resources across IDA eligible countries up to 2025, the commitment for it to remain an important focus of IDA is welcome. However, the policy commitment should be strengthened. Firstly, given the vital importance DRM will play in financing the SDGs, the commitment to support just 15 countries throughout IDA20 appears too low, especially with the likely demand from governments for support in this area. In addition, whilst it is welcome the support for DRM will focus on fairness and progressivity of tax policies and guided by broader fiscal incidence analysis, this could be expanded to explore support for tax policies to directly influence development outcomes, such as health and environmental taxation.</p>	<p>Thank you for your comment and observation on the role of IDA in DRM. Based on our assessments, the current target is realistic especially considering the short time frame we have available under each IDA cycle.</p>
<p>UNICEF</p>	<p><i>Suggestion</i></p> <ul style="list-style-type: none"> • UNICEF suggests including an emphasis on budget transparency to complement the report’s focus on debt transparency. 	<p>We agree that budget transparency is an important issue. To this end, IDA is committed to fiscal transparency, a principle that is already well embedded in our global and country programs. This adequately complements the IDA20 focus on debt transparency. Please note that budget transparency reforms would require different processes, capacity improvements, and assistance from IDA than envisaged for debt transparency. As such, we suggest maintaining a narrowly focused commitment on debt transparency.</p>

Cross Cutting Issue: Debt

Organization	Comments	Response/Action
<p>Raise Your Voice Saint Lucia Inc.</p>	<p>These intervention are critical and timely, however we opine that debt forgiveness is key to economic recovery after COVID-19</p>	<p>Noted with thanks. IDA plays a key role in a global coalition to address debt vulnerabilities in IDA countries, by participating in the G20 Debt Service Suspension</p>

Organization	Comments	Response/Action
		Initiative (DSSI) and the Common Framework for debt treatment, in close collaboration with the IMF. The World Bank and IMF's role is critical in ensuring debt treatment is grounded in sound analytics, while also having an important role in providing sufficient concessional financing to participating countries during the debt treatment phase. As of end June 2021, three countries (Chad, Ethiopia and Zambia) have requested a Common Framework treatment.
ODI - A Global Affairs Think Tank	<ul style="list-style-type: none"> <li data-bbox="321 443 1335 865">• We welcome the IDA20 commitment to deepen support in the areas of debt sustainability, debt transparency and fiscal sustainability. Debt management is a complex yet crucial reform area with many countries struggling to build capacity in some basic areas such as debt recording and reporting. <i>Finding ways to incentivise reforms to reduce debt vulnerabilities remains crucial though, especially when there is little domestic appetite.</i> Although the Sustainable Development Finance Policy (introduced in IDA19) seeks to do this through potential set-asides of IDA allocations, incentives are limited given that IDA represents an increasingly small share of total net financial flows, particularly for market access countries. There is also a tension between the use of set-asides and the importance IDA has assigned to rapidly increasing commitments to the countries most affected by the Covid-19 crisis. Finally, although the World Bank has provided substantial technical assistance to countries to improve how debt management systems and processes look, more attention needs to be given to how these systems and processes function and impact the government's borrowing decisions and risk of debt distress.¹⁰ <li data-bbox="321 1182 1335 1385">• On the creditor side, we welcome IDA20 prioritising deepening engagement with creditors through the Program of Creditor Outreach (PCO). The success of the SDFP requires all creditors to adopt a similar approach. However, it is unclear whether the World Bank on its own is best placed to convene creditors and establish sustainable lending practices/guidelines when it is no longer a dominant creditor. Not only have previous efforts at coordination with non-Paris Club and private creditors produced little concrete results, recent experiences with China and private creditors in the G20 Debt Service Suspension 	<p data-bbox="1356 443 1980 1141">Thank you for your comment. The SDFP provides countries with important performance and policy actions that aim to alleviate the country's debt vulnerability in the medium to long term. The Policy's implication is therefore more than the size of IDA resources. In addition, SDFP compliance is one of the prerequisites for the implementation of G20 initiatives – DSSI and Common Framework. Public debt is a cross-cutting theme in IDA19 and IDA20. The main workstreams, comprising debt sustainability, debt transparency, debt management, and support on global debt initiatives are implemented through operational engagements, analytical work, and technical assistance. Debt vulnerabilities are therefore addressed in an integrated and comprehensive way. Diagnostic and analytical work aim at taking stock of current debt transparency, sustainability, and management practices and institutions and highlighting key trends and areas for improvement. Technical assistance and analytical tools are then provided to countries to assist in addressing those key challenges. IDA policy commitments and policy and performance actions under the SDFP are important in this context, and are complemented by a broader set of tools as mentioned above.</p> <p data-bbox="1356 1190 1980 1369">Thank you for acknowledging IDA20's focus on deepening engagement with creditors. We acknowledge that the evolving creditor landscape has made creditor coordination a challenge. To this end, the PCO under the SDFP builds on IDA's global platform and convening role to ensure that the Bank is working collectively with other</p>

¹⁰ [Africa's rising debt: how to avoid a new crisis | ODI: Think change](#)

Organization	Comments	Response/Action
	<p>Initiative and Common Framework for Debt Treatment highlight how fragile creditor coordination is. We, therefore, welcome Management’s commitment to clarify the strategic directions and overall goals of the PCO.</p>	<p>creditors (including traditional and non-traditional ones) on this matter to promote stronger collective action, greater debt transparency and closer coordination among borrowers and creditors to mitigate debt-related risks. PCO activities in FY21 have been focused on SDFP implementation updates, targeted outreach to development partners, and exploring avenues for further collaboration with multilateral development banks and bilateral partners. Going forward, activities under the PCO will be intensified to support implementation of the SDFP, advancing dialogue to facilitate sustainable financing and coordination and debt data sharing with traditional and nontraditional creditors.</p> <p>Updated information on the strategic direction and overall goals of the program of creditor outreach, including on country level activities, will be shared after further implementation of the program in the next SDFP Update to the Board in the third quarter of FY22.</p>
UNICEF	<p><i>Areas of Support</i></p> <ul style="list-style-type: none"> UNICEF supports the inclusion of “debt” as a cross-cutting issue for IDA20. Per UNICEF’s latest report, in many countries, debt payments outweigh government budgets for social expenditure, and even before the current crisis, one fifth of LMICs spent more on debt service than on education, health and social protection combined. <p><i>Suggestion</i></p> <ul style="list-style-type: none"> UNICEF suggests further emphasis on debt relief given the challenges many governments face due overlapping crises, and in some cases, the inability to qualify for HIPC. 	<p>Noted with thanks. IDA plays a key role in a global coalition to address debt vulnerabilities in IDA countries, by participating in the G20 Debt Service Suspension Initiative (DSSI) and the Common Framework for debt treatment, in close collaboration with the IMF. The World Bank and IMF’s role is critical in ensuring debt treatment is grounded in sound analytics, while also having an important role in providing sufficient concessional financing to participating countries during the debt treatment phase. As of end June 2021, three countries (Chad, Ethiopia and Zambia) have requested a Common Framework treatment.</p>

Cross Cutting Issue: Technology

Organization	Comments	Response/Action
ODI – A Global Affairs Think Tank	<ul style="list-style-type: none"> While we welcome the emphasis in the IDA deputies report on “connectivity”, and “foundational digital infrastructure”, a few more areas should be reflected in the report or given greater emphasis. These include the foundations of “foundational digital infrastructure”, in particular around <i>data governance</i>; the role of government, in particular, in developing the contributions and capabilities of digital government <i>institutions</i>, 	<p>We fully agree on the critical importance of going beyond <i>access</i> to connectivity and further address issues of <i>usage and digital adoption</i> in IDA20. IDA will adopt an ecosystem approach to digital transformation, focusing on both the foundational elements of the digital economy,</p>

Organization	Comments	Response/Action
	<p><i>strategies, and teams</i>; digital literacy, particularly amongst government policymakers, as well as the wider public; and finally, public procurement, particularly the capability of the government to develop the market for digital services, including adopting more appropriate financing models.</p>	<p>including digital infrastructure, digital platforms, digital literacy and skills (including amongst government policymakers), as well as digital applications across critical sectors, while ensuring protection of personal data and mitigating cybersecurity risks. IDA20's focus on <i>data privacy and governance</i> will significantly strengthen these efforts. The work around operationalization of the World Development Report 2021 and building reliable data ecosystems will tackle the issues of data infrastructure (including cloud, international and regional connectivity), data protection, data-sharing and pooling structures, digital transformation and adoption of digital by households and businesses.</p> <p>The Jobs and Economic Transformation (JET) policy commitment #6 is bringing out the inclusion, affordability, security (including cybersecurity and data governance) and usage dimensions to expand access, reflecting the ecosystem approach to digital transformation. JET policy commitment #3 is addressing the procurement and governance of quality infrastructure, and Governance policy commitment #3 is focusing on strengthening GovTech policies and regulations to enable digital government services and solutions.</p>

Special Theme: Human Capital

Organization	Comments	Response/Action
Bread for the World	<p>Healthy Diets</p> <p>Bread for the World welcomes the heightened visibility of agriculture, food security, and nutrition in the draft IDA20 deputies' report. These topics receive more attention throughout the themes, which include climate change, jobs and economic transformation, human capital, crisis preparedness, and gender.</p> <p>We welcome both the focus on maternal and child nutrition services within the human capital theme, and the focus on improving climate adaptation in agriculture and improving agricultural productivity. However, a critical link between the two is missing. IDA20 should include policy commitments to support IDA countries to contribute to healthy diets by improving the affordability and accessibility of nutritious foods. This is a critical aspect of addressing maternal and child malnutrition. It should be done by focusing on promoting diverse agricultural value chains and enhancing market access for both producers and consumers.</p>	<p>Thank you for the support of this critical agenda; we agree with the essential importance of affordability and access to nutritious food. IDA20 addresses this issue as part of its food security agenda as well as in several policy commitments, including on investing in children's early years (under Human Capital) and on boosting agriculture productivity, value chains and food security (under Jobs and Economic Transformation).</p>

Organization	Comments	Response/Action
SDG2 Advocacy Hub	<p>Pg. 49 rec. 4 It would be strengthened by adding the highlighted. <i>Expanding adaptive social protection and building resilience to shocks: To ensure inclusive and effective response against shocks and crises, support at least 20 IDA countries' resilience by building adaptive social protection systems that reach populations in rural and urban informal sectors, including the use of digital technologies,</i></p> <p>Pg. 45 Para 88—Informal work is also prevalent in rural areas and among small-scale producers and agricultural workers. Rural populations disproportionately lack access to social protection programs. Evidence points to the importance of access to social protection in reducing rural food insecurity and poverty (Ceres2030 and https://www.un.org/development/desa/dspd/2021/05/social-protection-in-rural-areas/)</p>	<p>Thank you for making this point: The language in the Deputies' Report will further underscore the importance of prioritizing support to poor and vulnerable populations, and to make explicit that informal workers are prevalent in both rural and urban areas.</p>
Global Coalition on Social Protection Floors Ad hoc Group on IDA20	<p>Para 88 The GCSPF acknowledges the mention of “broader goal of ensuring universal access” and welcomes the reference to ILO 202 and Convention 102 (footnote 83). We do challenge, however, the claim that the IDA approach of “progressive universalism” is in line with ILO202.</p> <p>“Progressive realization” is of course mentioned in ILO202, but it can be pursued in many different ways, such as gradually changing the age limits for child benefits or old age pensions. “Targeting” is nowhere mentioned in the ILO202, while it stresses the “universality of protection”, by referencing “all residents and children”.</p> <p>Furthermore, the report fails to give any reference to the concept of “progressive universalism”. Any use of such a concept should take the newly adopted definition of universal social protection as its starting point: “Universal social protection entails actions and measures to realize the human right to social security by progressively building and maintaining nationally appropriate social protection systems, so that everyone has access to comprehensive, adequate and sustainable protection over the life cycle, in line with ILO standards”.¹¹</p> <p>In line with the definition above, and from an empirical perspective, we challenge the claim that it is possible to “ensure that all those who need social protection can access it when they need it” through a targeted system rather than social protection floors. Poverty targeted safety nets reliant on proxy-means testing, social registries, and similar approaches, will inevitably exclude many people who need, and have the right to protection¹².</p> <p>Finally, references should be made to the International Labour Conference's (ILC) framework for action, just as other international norms are referred to in other parts of the Human Capital Theme - see for example Convention on the Rights of Persons with Disabilities (box 3.6),</p>	<p>Thank you for these important points. IDA fully supports universal access to social protection and works to ensure that all those who need support can access it when they need it. The Bank uses the concept of “progressive universalism” with a focus on reaching the poorest and most vulnerable first, as they are typically the most in need and the most under-covered group, before expanding the coverage further, considering the fiscal constraints in many countries, particularly IDA countries. Our flagship report “<i>Protecting All: Risk Sharing for a Diverse and Diversifying World of Work</i>” refers to ILO's 202 and discusses the rights and norms mentioned above.</p> <p>Indeed, ILO is a key partner, and we will reflect this in the Deputies' Report. Please also note that ILO and the World Bank co-chair the Universal Social Protection 2030 (USP 2030), reiterating our commitment to support countries to gradually move towards a vision of USP.</p> <p>The core objective of “Universal Health Coverage” is to ensure access to affordable quality health care services for all people. These elements are the driving force and embodied in the definition of UHC.</p>

¹¹ Record of proceedings, International Labour Conference – 109th Session, 2021 [wcms_804457.pdf \(ilo.org\)](#)

¹² S. Kidd, D. Athias ; Development Pathways / Act Church of Sweden (2020). [Hit and Miss: An assessment of targeting effectiveness in social protection.](#)

Organization	Comments	Response/Action
	<p>International Health Regulations (para 85) and Political Declaration on Universal Health Coverage (para 85).</p> <p>Suggestion: Insert the following in the first sentence in para 88: Building on the robust progress in IDA19, <u>and in line with the framework for action towards universal social protection systems adopted by the ILC¹³</u>, IDA20 will support further incorporating adaptive social protection into national systems to reduce the risks of a range of shocks and provide a platform for the delivery of a range of other services to hard-to-reach individuals and groups.</p> <p>Para 92</p> <p>We regret to see that the ILO is not explicitly mentioned along with other international institutions that IDA is partnering with. It is our view that this omission is indicative of the lack of integration by the WB of the ILO’s standards and principles, in developing social protection policies and programs. Indeed, ILO is a standard setting organisation on social protection, whose standards and guidance should guide IDA’s interventions.</p> <p>Additionally, the ILO and the WB already collaborate in both USP2030 and SPIAC-B, both fora supposed to foster better coordination and harmonization in the development of social protection policies and programs across the globe.</p> <p>Finally, the second phase of ILO Global Flagship Programme “Building Social Protection Floors for All”, is starting now and will operate in 50 countries, many of which IDA countries. There is a great potential to increase collaboration so that IDA20’s investments in social protection complement, and are coordinated with, the capacity building initiatives implemented in IDA countries through the Flagship Programme. Strengthening partnerships with all stakeholders is an important strategy in the ILO programme (see the strategy document and report of a recent meeting with development partners).</p> <p>Support for the suggestions above can be found in para 33: “At global, regional, and country levels, IDA partners with countries and institutions to respond to client needs in a coordinated and effective manner. This includes collaboration with multilateral, bilateral and domestic partners, including the International Monetary Fund (IMF) and other MDBs, the United Nations (UN) and its agencies, the European Commission, bilateral partners, Civil Society Organizations (CSOs), and the private sector.”</p> <p>Specific comments on policy commitments:</p> <p><u>Policy Commitment 1:</u> we welcome the emphasis put on HSS and UHC as overarching goals. However, we regret to see that no mention is made of the availability, accessibility, acceptability and quality of health services</p> <p><u>Policy commitments 3, 4 and 8:</u> we regret to see that no substantive changes have been made to the policy commitments regarding SP.</p>	

¹³ Record of proceedings, International Labour Conference – 109th Session, 2021 [wcms_804457.pdf \(ilo.org\)](#)

Organization	Comments	Response/Action
	<p><u>Policy commitment 6</u>: we reiterate our support to the universal view adopted in this policy commitment.</p>	
<p>Bank Information Center</p>	<p>Disability We commend IDA for better integrating inclusion and equity within the IDA20 Draft Deputies Report under the Human Capital Special Theme, specifically within points 85 and 86 on the COVID-19 vaccine rollout plans.</p> <p>However, we are concerned that the Human Capital Policy Commitments (PCs) still lack ambition on disability, and encourage IDA shareholders to better consider disability within the Human Capital Special Theme. Unless persons with disabilities are explicitly referenced in the PCs, taking 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. For instance, PC 2, which focuses on maternal and reproductive health, should also address access to these services for persons with disabilities. We suggest the following language (in bold) below be added accordingly:</p> <p><i>Human Capital</i> 2. Investing in women’s empowerment: Support women’s empowerment, through restoring and expanding access to quality, affordable, and inclusive sexual and reproductive, adolescent, and maternal health services, in at least 30 IDA countries, of which 15 countries with the lowest HCI.</p> <p>Further, we encourage IDA to significantly increase the number of countries it commits to supporting under PC 6. In the IDA20 Draft Deputies Report, IDA commits to supporting at least eighteen IDA countries to meet the needs of persons with disabilities by implementing the</p>	<p>Thank you for the support, suggestions, and continued attention to the work towards equity for persons with disabilities. IDA will continue to play an important role in ensuring equal access to development benefits, in addressing constraints, as well as in enabling new opportunities for persons with disabilities.</p> <p>Building on the foundation laid in IDA19, IDA20 will go deeper by adopting a standalone policy commitment that is specific to advancing disability inclusion. It is premised on the guiding principle of universal access to benefits from projects across sectors – scaling up support to disability inclusion across IDA’s Special Themes and Practice Groups. IDA20 will also help countries build further statistical capacity to enable the collection of disability data disaggregation using household surveys and other measurement tools – a longstanding constraint that goes beyond disability inclusion (e.g., with important impact for closing gaps between women and men).</p> <p>It is important to note that these activities are additional to the foundational provisions for universal access to Bank-supported operations laid out in the World Bank’s Environmental and Social Framework. They are also additional to the Ten Commitments on Disability Inclusive Development made at the 2018 Global Disability Summit, which help safeguard against discrimination and move the agenda forward on agendas that are key for the inclusion of persons with disabilities.</p> <p>The policy commitment on early years and maternal and reproductive health services targets all groups and this is also true for the commitment on investing in women’s empowerment. Explicit references to “inclusive” would therefore be redundant.</p> <p>The target for the policy commitment on expanding access to core services for persons with disabilities is ambitious</p>

Organization	Comments	Response/Action
	<p>principles of universal access through projects in education, health, social protection, water, urban, digital development and/or transport. However, IDA projects are already required to meet these standards under the Bank’s Environmental and Social Framework (ESF). At a minimum, IDA should significantly increase the number of countries it commits to supporting under this objective.</p> <p><i>Preventing SEA/H</i> Preventing Sexual Exploitation, Abuse, and Harassment (SEA/H), especially of children, is not sufficiently prioritized across themes, particularly the Fragility, Conflict, and Violence and Human Capital Special Themes. There is an inherent risk of SEA in all types of projects funded by IDA. Further, the global economic downturn caused by COVID-19, which is still at its height in many developing countries, has led to significant negative impacts for women and children, especially those out of school, including an increase in SEA. SEA is particularly acute in FCV contexts. However, there are no SEA commitments within the FCV theme, nor is SEA addressed within the Human Capital theme. We suggest the fragile and conflict-affected situation (FCS) sub-target within Human Capital (PC 3) is expanded to include SEA/H. We suggest the following language (in bold) below be added accordingly:</p> <p><i>Human Capital</i> 3. To address gaps exacerbated by the COVID-19 crisis requires a multi-sectoral approach and the engagement of a broad set of stakeholders. In at least 40 IDA countries, of which 10 are FCS, support access to core, quality, inclusive social services focused on: (i) social protection for urban informal workers, and/or (ii) students’ return to school and accelerated recovery of learning losses, with a special focus on addressing constraints faced by girls, and/or (iii) children’s immunizations, and/or (iv) preventing SEA/H, especially of children.</p> <p>We encourage IDA Deputies to recognize that preventing child SEA and protecting children enables them to complete their education and represents a significant investment in human capital. Please see the section below for more information about our recommendation to include language on stakeholder engagement under PC 3.</p>	<p>and realistic and has been determined on the basis of the currently known pipeline under these sectors. It is also important to note that the target sets a minimum level and in no way caps the number of countries that can meet the commitment to 18.</p> <p>Thank you for raising this concern, which we share. IDA recognizes the inherent risks you raise and has launched a program of measures to prevent sexual exploitation, abuse, and sexual harassment (SEA/SH) across all operations, including those corresponding to all IDA’s Special Themes. New sanctions measures, procurement regimes, and mandatory training help enforce the mitigation efforts. But the first line of prevention is encased in the Bank’s Environmental and Social Framework (ESF) policy, which mandates that every new project is screened for SEA/SH risks and include survivor-centric mitigation measures. In addition, projects that are already active in the portfolio but have been identified as higher risk are also screened and retrofitted to mitigate risk and take survivor-centric measures. Mitigation measures are extensive and based on project risk ratings, which account for whether a project is characterized as FCS. The mitigation measures further give special consideration to children and their safety. In addition to mitigation, some sectors are making advancement on prevention of SEA/SH. For example, the Education sector has safe schools as a pillar of its strategy, and violence prevention including SEA/SH is a key component.</p> <p>These risk-mitigating efforts are complemented by the broader work to prevent and respond to gender-based violence, which also addresses violence that goes beyond sexual exploitation, abuse, and sexual harassment – such as intimate partner violence, rape, and other forms of GBV, through targeted actions in operations. IDA commitments in IDA18 and IDA19 now help advance this work, which includes specific actions addressing the risks children face, such as operations helping school systems better to prevent and respond to gender-based violence. Beyond education, some other areas that receive significant IDA funding to prevent and respond to GBV</p>

Organization	Comments	Response/Action
	<p>Stakeholder Engagement</p> <p>We would like to see greater recognition of the integral role that engagement with all affected communities plays across the Special Themes and Cross-Cutting Issues. However, it's most critical that stakeholder engagement is sufficiently considered within the Human Capital Special Theme and the Crisis Preparedness Cross-Cutting Issue, which it currently is not. In fact, Objective 3 under the Human Capital Special Theme draft policy paper included the following statement, now omitted from the draft IDA20 Deputies Report: "Addressing the human capital gaps exacerbated by COVID-19 requires a multi-sectoral approach and the engagement of a broad set of stakeholders."</p> <p>Stakeholder engagement is essential to delivering on IDA20's human capital objectives, and this omission within the draft IDA20 Deputies Report is deeply concerning. Including our recommendation above on SEA/H, we suggest the following language (in bold) below be added to the Human Capital PC 3 accordingly:</p>	<p>include health, trade and competitiveness, transport, and social development.</p> <p>We agree that the stakeholder engagement process is crucial and integral to inclusive, effective and well-designed projects, and we have added language in the Deputies' Report to reflect this.</p>
<p>Leadership Collaborative to End Ultra-Poverty</p>	<p><i>Under 'Human Capital' No. 4: Expanding adaptive social protection and building resilience to shocks: To ensure inclusive and effective response against shocks and crises, especially among the poorest, support at least 20 IDA countries' resilience by building adaptive social protection systems, including the use of digital technologies.</i></p> <p>While we welcome the inclusion of targets, we are concerned that several of the numerical targets proposed by the World Bank undermine the ambition of the policy language.</p> <p>In our previous communication to IDA Deputies, we argued that the numerical targets for social safety net coverage should be reported for the first quintile of the population, i.e. those citizens most in need of safety net coverage, because, in 2018, between 25% and 63% of social assistance payments went to the upper three quintiles in Africa. This continues to be a concern.</p> <p>Not only are the numerical targets proposed by the Bank not disaggregated, they are now blurred by the inclusion of temporary benefits offered in response to the pandemic, which defeats the purpose of tracking the growing permanent floor of social protection. While the Bank's proposed minimum target of 75 million people may seem to exceed our requested minimum target of 44-54 million people covered by a safety net, the Bank's proposed minimum target of 75 million people includes people receiving temporary COVID benefits. Considering over 150 million people in IDA countries received COVID-19 benefits in the first year of the pandemic, we fear that if one discounts the temporary COVID benefit recipients in 2022 (or later) from the Bank's 75 million target, we could end up having fewer than 30 million people covered by safety nets, i.e., less than was targeted under IDA 19.</p>	<p>We fully agree with this suggestion. Please also see our response to SDG2 Advocacy Hub.</p> <p>Generally, IDA projects aim to focus resources on the poorest and most vulnerable. Coverage of the poorest quintile is tracked at country-level both in ASPIRE and the Africa Human Capital plan, based on the availability of household survey data.</p> <p>We agree on the importance of distinguishing between temporary vs. permanent coverage. This is also the reason why the RMS indicator on social safety net coverage will have a sub-indicator to allow the tracking of both permanent and temporary COVID-19 coverage.</p> <p>Regarding the commitment on human capital financing, the target of 8 countries among those IDA countries with the lowest Human Capital Index is based on a close review of the portfolio and taking into consideration country capacities to undertake complex policy reforms. We believe that the target set for this commitment is realistic while keeping ambition of IDA20 in mind.</p> <p>On the targets for large-scale learning assessments, we think the current target is realistic, yet ambitious. RMS indicators under Tier 2, these for the most part track direct</p>

Organization	Comments	Response/Action
	<p><i>We therefore propose that the target for the minimum number of people reached by safety nets be qualified and set at 44-54 million, <u>excluding temporary COVID-19 coverage, with a majority in the first quintile.</u></i></p> <p>Building from the numerical targets, there are two related concerns with the proposed indicators that could have a substantial impact on economic inclusion:</p> <ul style="list-style-type: none"> - In IDA 20, the World Bank is committing to 25-35 large scale educational outcome assessments, down from 30-40 in IDA 19. This reduced ambition is difficult to understand given the priority IDA 20 places on learning outcomes. Improving learning outcomes is key to ending extreme poverty, because parents are less likely to send children to school when learning outcomes are mediocre, which then perpetuates the cycle of economic exclusion, especially for girls. - More generally, in IDA 20, the World Bank is committing to assisting only eight countries among those with the lowest human capital scores, to develop human capital funding plans, down from a target of 10 in earlier drafts this year. This reduction of ambition is deeply concerning given low human capital investment is a systemic contributor to extremely poor households being kept from the economic mainstream. <p>Our request is:</p> <p><i>For IDA 20 to maintain the level of ambition expressed in IDA 19 for the number of large scale learning assessments and maintain the level of ambition of earlier drafts for the number of human capital funding plans for low-Human Capital Index countries.</i></p> <p>To build support for the upcoming IDA 20 replenishment, it will be important to demonstrate unwavering commitment to reaching the extremely poor. We cannot wait for the next replenishment to pave the way for the attainment of the SDG1. Our proposals reflect this sense of urgency.</p>	<p>results of IDA-financed lending operations. Because results are typically driven by operations approved in previous cycles, targets are built up from the existing and pipeline portfolio. These fluctuate based on the nature of individual country programs and demand from IDA clients. Country programs are not shaped to meet a corporate target, but rather customized by IDA and its clients to address the binding constraints to ending poverty, boosting shared prosperity, and achieving the SDGs. The IDA 20 RMS will also report on cumulative performance, offering a better sense of the longer-term trend.</p>
Care International	<p>CARE welcomes the strong and ongoing emphasis on human capital in IDA20, and its elevation into a special theme. The World Bank's Human Capital Project has helped turn the spotlight on and accelerated global action for health, education, and social protection, which in the context of COVID-19 unravelling development progress by decades, is ever more urgent. It is very positive to see such strong emphasis placed on addressing gaps exacerbated by the COVID-19 pandemic, and to accelerate action on social protection, quality education and COVID-19 vaccinations across 40 IDA countries. CARE encourages the World Bank to place deliberate emphasis on reaching the most vulnerable with these interventions, and to take a needs-based and holistic approach to ensure gaps are closed for women and girls across human capital areas.</p> <p>It is a welcome approach to take a dual focus on addressing immediate need, and investing in longer-term recovery with strategic foresight. CARE welcomes the deliberate emphasis being</p>	<p>Thank you. IDA is one of the largest sources of assistance for the world's 74 poorest countries. We fully agree to the need for focusing interventions on the poorest and most vulnerable, which is reflected across the policy package. We are also making explicit reference to this in the commitment on adaptive social protection.</p> <p>Women and girls are integral to IDA's efforts to protect and invest in Human Capital. For instance, the focus on girls for the education-related interventions is ensured in the commitment on core social services, whereby interventions on return to school and learning recovery</p>

Organization	Comments	Response/Action
	<p>placed on expanding social protection for the most marginalised groups, on the pathway to universal social protection, and to mobilise and strengthen public financing for human capital. We urge IDA to focus on gender equality throughout human capital measures, to ensure results meet the diverse needs of women and girls and help tackle inequalities to leave no one behind.</p> <p>IDA20 should integrate a focus on gender equality throughout the special theme on human capital. Specifically, IDA20 should:</p> <ol style="list-style-type: none"> 1. Address the gaps exacerbated by COVID-19 and support access to core, quality and inclusive social services with a deliberate focus placed on reaching the most vulnerable as a priority. This requires both integrating a focus on gender equality – in recognition that women and girls have been disproportionately impacted by the pandemic - and integrating an intersectional, needs-based lens into all of IDA’s human capital interventions. The World Bank should amend human capital policy commitment number 3 by adding: “with a focus on reaching women and girls and the most marginalised groups, as a priority”. This deliberate emphasis will help prevent COVID-19 rolling back progress on gender equality by a generation, and reverse some of its worst impacts that have exacerbated pre-existing inequalities. 2. The focus on adaptive social protection is very welcome, but it needs to go further. IDA should integrate a focus on gender equality and reaching the most marginalised groups as a priority in its social protection measures. Workers in the informal economy constitute 60% of the global workforce, typically lacking access to social protection, and women make up a disproportionate amount of informal workers. In order to prioritise the needs of diverse women and groups facing intersecting discrimination, the World Bank should amend IDA’s human capital policy commitment number 4 by adding: “especially among the poorest and most marginalised groups”. This will help ensure that IDA’s welcome commitment to progressive unilateralism is integrated across its social protection interventions. CARE further encourages IDA20 to integrate measures on strengthening informal safety nets, such as savings groups, as stepping stones on the pathway to universal social protection. 3. It is very encouraging to see a strong emphasis being placed on ensuring learning outcomes for girls, and the use of sex-disaggregated data for education interventions. IDA should go further by placing an emphasis on gender equality across the human capital strand of work. This includes collecting and using sex, age and disability disaggregated data and implementing impact assessments on gender equality across the human capital portfolio. 4. It is very welcome to see IDA’s explicit commitment to strengthening domestic public financing for human capital. This should be done with an explicit focus on progressive taxation. Regressive tax income, e.g. from Value-Added Tax, requires all citizens to 	<p>would have a special focus on addressing constraints faced by girls. Similarly, the commitment on addressing learning poverty will ensure sex disaggregated results in order to track performance, and if appropriate, design special interventions for girls.</p> <p>We fully agree with the importance of further improving gender data, including by improving sex-disaggregation. The Bank is working to strengthen data capacity of IDA countries to fill remaining gaps, and we remain committed to sex-disaggregating all Tier 2 indicators, where possible.</p> <p>IDA20 will support countries in reshaping their tax systems to promote greater fairness and progressivity, transparency, and streamlined taxpayer services, while reducing opportunities for corruption. This is covered in the policy commitment on improving domestic resource mobilization through equitable (fair and progressive) revenue policies.</p>

Organization	Comments	Response/Action
	<p>pay the same share irrespective of their wealth and over-proportionally charges the poorest households, thus increasing poverty and exacerbating inequalities. IDA should ensure that Domestic Resource Mobilisation does not exacerbate inequalities by adding “through progressive taxation” to its human capital policy commitment number 8, and help partner countries identify and prioritise progressive tax reforms and taxation measures more broadly.</p>	
<p>ODI – A Global Affairs Think Tank</p>	<ul style="list-style-type: none"> <li data-bbox="321 350 1335 472">• We welcome the inclusion of human capital as a special theme in IDA20, especially the commitments to support response to the Covid-19 pandemic and strengthening pandemic prevention and preparedness, recovering learning losses and expanding adaptive social protection. <li data-bbox="321 505 1335 626">• While the commitment to directing IDA investments in human capital is welcome, there seems to be a <i>lack of ambition on the plans for supporting countries to improve their public spending on human capital</i>, especially when compared to the plans for support to tax systems. <li data-bbox="321 659 1335 967">• In particular, <i>the equity of spending is not mentioned, in contrast with the focus on fair and progressive revenue policies</i>. The importance of this issue is highlighted by a recent review of 70 health-focused Public Expenditure Reviews across 61 countries which found that equity issues dominate all other health-sector policy challenges in developing countries.¹⁴ We have earlier highlighted the need to look at the overall distributional impact of taxes and spending, rather than just looking at the revenue side alone. The Human Capital Special Theme Policy Commitment should include policy or administrative reforms impacting the equity of resource allocation to ensure spending is focused on the poor. An additional SDG-aligned indicator on ‘Pro-poor public spending’ could also be added to the Results Monitoring System.¹⁵ <li data-bbox="321 1000 1335 1203">• The fact that countries will be able to access additional financing to finance vaccination programmes on top of their country allocation from the Regional Window (RW) and Scale-Up Window Shorter-Maturity Loans is welcome. However, to maximise the impact of this, consideration should be given as to whether (a) the RW resources can be provided on a grant, rather than credit basis regardless of a country’s PBA terms, to incentivise uptake, (b) whether a single country can apply for financing, rather than needing programmes with two or more, especially for financing vaccination programmes and (c) whether the co- 	<p>The policy commitment supporting the Human Capital financing work is ambitious and builds on the strong analytical work on financing – notably public expenditure reviews which often look closely at incidence analysis -- to focus on policy and administrative reforms to improve outcomes. This focus on policy actions is a higher level of ambition, building on the policy commitment in IDA19 that focused on analytical work.</p> <p>Your comment on equitable financing is welcome and important. This is implicit in the focus of the policy commitment, notably on results-orientation of human capital investments. Please also note that IDA20 includes a new policy commitment under the Gender Special Theme that focuses on supporting more inclusive fiscal policies and budget systems. This new policy commitment focuses specifically on promoting more equitable spending, including, where appropriate, by evaluating the equality-related aspects of policies through fiscal incidence analysis. In general, the proposed approach to address the inclusiveness and fairness of fiscal policies, in addition to the traditional focus on revenue adequacy and expenditure efficiency, through three distinct but complementary policy commitments demonstrate IDA’s comprehensive but targeted response to the complex institutional challenges facing IDA countries.</p>

¹⁴ Gaudin, S., & Yazbeck, A. (2021). Identifying Major Health-System Challenges in Developing Countries Using PERs: Equity is the Elephant in the Room. *Health Systems and Reform*, 7(2).

¹⁵ Indicator 1.b.1: Pro-poor public social spending. Proportion of government spending towards health and education and direct transfers which benefit directly the monetary poor (at national poverty lines). See ‘From Guess Work to Evidence, A new SDG indicator on pro-poor public spending’, 10th March 2020 <https://www.savethechildren.org.uk/blogs/2020/from-guess-work-to-evidence-a-new-sdg-indicator-on-pro-poor-public-spending>

Organization	Comments	Response/Action
	<p>financing ratio can be reduced to maximise the additionality of these funds on top of the country allocation.</p> <ul style="list-style-type: none"> It is also stated that these windows could provide ‘risk capital’ for regional and global procurement mechanisms. This is needed so that these mechanisms have access to resources to secure supplies even before individual countries take decisions to allocate resources to them. However, the governance and implementation arrangements for the use of these windows as risk capital is not set out. If this cannot be worked out before the finalisation of the IDA deputies report, the report should at least set out how these arrangements are to be worked out and approved by the Board. 	<p>Regarding financing for vaccines, the incentive is the additionality in resources from the Regional Window and the Scale-Up Window over and above country allocations. However, it is important to maintain the underlying performance-based allocation system as well as the consideration of the debt situation in countries. Countries at high risk of debt distress will be able to access the additional Regional Window on grant terms. Credit terms for other countries are highly concessional. Scale-Up Window financing provides a less expensive option to higher cost external loans for countries at low risk of debt distress. Co-financing ratios are established at levels that would enable access to the financing for more countries than would be possible if the ratios were to be reduced. The Regional Window provides financing for opportunities that enable countries address externalities across borders, and IDA20 will provide increased flexibility by enabling two countries (rather than three under IDA19) work together to address vaccination as a public good.</p> <p>Thank you for your feedback on the possible provision of risk capital for global and regional procurement mechanisms via the Regional and Scale-Up windows. Its inclusion was to note that IDA is open to exploring all possible financing options going forward. Currently, however, there are no risk capital proposals being considered for these windows. The relevant text in the Deputies’ Report will be edited to improve clarity.</p>
Oxfam International	<p>INEQUALITY AND PUBLIC SERVICES</p> <p>We recommend that the Bank finds more opportunities to reference, understand, and address the crisis of deepening inequality, through IDA. We urge the Bank and Deputies to consider making Inequality a theme for IDA21. For now, IDA20 must take every opportunity to support countries to reduce inequality and, by doing so, reduce poverty and mitigate the impact of future crises. We note the references to inequality in the Domestic Resource Mobilization and the Labor sections. However, a key equalizer is guaranteeing free, universal access to public social services. We note with enthusiasm the language around Universal Health Coverage and supporting countries on the path towards universal social protection. However, more can be done to reinforce the responsibility of governments in providing such services.</p>	<p>Thank you for your suggestion. Historically, the vast majority (over 90%) of the World Bank’s basic education projects between 2006 and 2019 have supported only public education provision, so the reductions in learning poverty implied by this commitment would naturally come from investments in public education provision. Still, given that “strengthening public education provision” is a much broader objective (and is the core work of education projects for IDA countries), we prefer this commitment to stay more focused on addressing learning poverty, which is aligned with SDG 4.1.1. In reference to the request for income-based disaggregation; while this is likely to be infeasible for most large-scale learning assessments (as</p>

Organization	Comments	Response/Action
	<ul style="list-style-type: none"> <li data-bbox="373 134 1310 224">• The policy commitment under the Human Capital Special Theme on Learning Poverty is one example where we propose specific revisions (suggested changes in red): <p data-bbox="432 253 1281 496"><i>Addressing learning poverty and improving learning outcomes:</i> To fill critical learning gaps and ensure improvements in learning outcomes, support at least 20 IDA countries, of which 10 are among those IDA countries with the lowest HCI, <i>to strengthen public education provision and</i> to reduce learning poverty by (i) measuring <i>and addressing gaps in</i> learning, with sex <i>and income-based</i> disaggregation, and (ii) implementing core elements of the literacy policy package (e.g., effective literacy instruction, structured lesson plans, adequate reading materials for all children).</p>	<p data-bbox="1360 134 1976 313">they do not collect information on income as part of background questionnaires, and at most collect proxies of household wealth or parents' education), we will capture any available disaggregation that aims to monitor distribution of performance by socioeconomic status (e.g., urban/rural).</p>
Results Canada	<p data-bbox="321 534 1335 894">We are encouraged to see an increase (from 30 to 35) in the number of economic inclusion projects that will have a component directed at women. We also welcome the World Bank's commitment to progressive universalism, starting with interventions that target the poorest segments of society (paragraph 88). Similarly, we also note that in paragraph 123 that you intend to reach "especially the poorest" in your planned economic inclusion initiatives for women. While we applaud the approach referenced in these two paragraphs, we are concerned that the intention will be lost if it is not explicitly included in the wording of the policy commitment. Therefore, we request that in the wording of the policy commitments on adaptive social protection (Human Capital No. 4) and economic inclusion (Gender and Development No. 2) the World Bank commit to using measurable approaches to ensure IDA does not inadvertently leave behind the most vulnerable segments. This could be achieved through modest adaptations to the language, for example through the addition of the following underlined wording:</p> <p data-bbox="321 927 1335 1049"><i>Under 'Human Capital' No. 4: "Expanding adaptive social protection and building resilience to shocks: To ensure inclusive and effective response against shocks and crises, <u>especially among the poorest</u>, support at least 20 IDA countries' resilience by building adaptive social protection systems, including the use of digital technologies"</i></p> <p data-bbox="321 1081 1335 1138">Additionally, the World Bank has adopted the globally accepted goal of reaching a COVID-19 coverage rate of 70%. This goal should be inserted into the Human Capital No. 1:</p> <p data-bbox="321 1170 1335 1292"><i>"Support all IDA countries to strengthen health security and advance inclusive health systems and universal health coverage, including (i) containing the COVID-19 pandemic, through vaccine rollout <u>to a coverage rate of 70%</u>, testing, treatment and care, and/or (ii) strengthening pandemic preparedness including prevention, detection and response."</i></p> <p data-bbox="321 1325 527 1349">Measuring Inputs</p> <p data-bbox="321 1382 1335 1438">There is an considerable delay in publishing results, which rarely allows for course correction. Measuring inputs is not ideal, but it can give an early warning of a requirement for course</p>	<p data-bbox="1360 534 1976 623">Thank you. For the commitment on adaptive social protection, we propose to modify the language to include 'especially among the poorest and the most vulnerable'.</p> <p data-bbox="1360 656 1976 867">The Bank is supportive of the global goal of reaching a COVID-19 vaccination coverage rate of 70%. IDA's support will complement efforts by each individual country and other development partners to attain the goal. Because this is a country-driven effort, it is not within IDA's authority to commit member countries to reach a specific country-level rate of vaccine coverage.</p> <p data-bbox="1360 932 1976 1289">Improvements to Human Capital are achieved through investments in multiple sectors. Therefore, while we are able to identify specific operations that contribute to this goal, our reporting tools are not calibrated to measure the exact amount that is invested in Human Capital. Rather than reporting on inputs, we report on the progress achieved in Human Capital development outcomes made through World Bank operations and other types of engagements with client countries. This is done through our corporate reporting of IDA Policy Commitments and through Human Capital indicators that are included in the IDA Results Measurement System.</p>

Organization	Comments	Response/Action
	<p>correction as little input always yields at most little results. The World Bank is already tracking human capital funding for other publications (for instance, see the Africa Human Capital Report Year 1 Progress Report, p.23, World Bank Document), so this should not be an onerous imposition, especially since the Directors' Draft does not include many requirements for the Mid-Term Review.</p> <p><i>We are therefore recommending that each year, and at the time of the Mid-Term review, the World Bank publish the amount of funding allocated to human capital and the number of development policy operations with a significant human capital focus.</i></p>	
Results Japan	<p>Human Capital Special Theme Policy Commitments</p> <ol style="list-style-type: none"> 1. Boosting COVID-19 vaccination rollout and strengthening pandemic preparedness: Support all IDA countries to strengthen health security and advance inclusive health systems and universal health coverage, including (i) containing the COVID-19 pandemic, through vaccine rollout, testing, treatment and care, and/or (ii) strengthening pandemic preparedness, including prevention, detection and response. 2. Investing in children's early years: To promote child development, restore and expand access to quality early years services, including maternal and nutrition services by integrating nutrition into UHC, in at least 30 IDA countries, of which 15 countries are among those IDA countries with the lowest Human Capital Index (HCI).a Particularly, school meal programs are launched in the world to cooperate with various sectors such as education, hygiene, nutrition, production, infrastructure, and businesses. The school meal program has been suspended due to COVID-19. In order to resume the school meal program, we will promote food independence by establishing a strong ecosystem, including procurement, production, processing, distribution, and consumption in the region. Specifically, (i) Ensure that good-diet for all children provided by agricultural products produced in their region. (ii) Enable producers to operate their farms stably to ensure demand from their region. (iii) Establish a new community through a good local circulation system from the production to the consumption in their region. (iv) Implement awareness-raising activities for children and their families to maintain health conditions for children, including health, hygiene, and nutrition. 3. Supporting core social service delivery systems: To address gaps exacerbated by the COVID-19 crisis, in at least 40 IDA countries, of which 10 are FCS, support access to core, quality, inclusive social services focused on: (i) social protection for urban informal workers, and/or (ii) students' return to school and accelerated recovery of learning losses, with a special focus on addressing constraints faced by girls, and/or (iii) children's immunizations. 	<p>Thank you for these comments, which include important elements consistent with our approach to nutrition-specific and nutrition-sensitive interventions. These elements are better suited for the report narrative so as to keep the policy commitments more focused.</p> <p>Regarding the commitment on addressing learning poverty, proposed measures related to COVID-19 health and hygiene protocols will be covered under the return-to-school measures in the commitment on core social services. Furthermore, while education projects in IDA countries may work on the proposed topics of school nutrition, the commitment should not lose its focus on reducing learning poverty, which is aligned with SDG 4.1.1.</p> <p>Regarding the commitment on pandemic preparedness, IDA support for the One Health approaches is channeled to eligible governments. Support to R&D through the private sector is beyond the scope of IDA20.</p>

Organization	Comments	Response/Action
	<p>4. Expanding adaptive social protection and building resilience to shocks: To ensure inclusive and effective response against shocks and crises, support at least 20 IDA countries' resilience by building adaptive social protection systems, including the use of digital technologies.</p> <p>5. Addressing learning poverty: To fill critical learning gaps and ensure improvements in learning outcomes, support at least 20 IDA countries, of which 10 are among those IDA countries with the lowest HCI, to reduce learning poverty by (i) measuring learning, with sex disaggregation and (ii) implementing core elements of the literacy policy package (e.g., effective literacy instruction, structured lesson plans, adequate reading materials for all children). Due to raising awareness of educational services safely, we reaffirm schools are important places to check and monitor the health conditions of children. IDA assists to develop the school operation manual under COVID-19, including the hygiene manual. In addition, IDA encourages each country to introduce regular health checkups and school lunch programs to maintain children's health conditions. IDA utilizes the dietitians to implement nutrition education to let children understand a balanced diet. IDA also introduces programs for raising awareness of health, hygiene, and nutrition among children, such as regular cleaning in school.</p> <p>6. Expanding access to core services for persons with disabilities: To promote inclusive societies, support at least 18 IDA countries to meet the needs of persons with disabilities by implementing the principles of non-discrimination, inclusion, and universal access as per the Environmental and Social Framework, through projects in education, health, social protection, water, urban, digital development and/or transport.</p> <p>7. Supporting prevention of and preparedness for future pandemics: To strengthen health security by improving pandemic preparedness and prevention at the nexus of human, animal, and ecosystem health, including zoonotic diseases and anti-microbial resistance, support at least 20 IDA countries to mainstream One Health approaches. Support private sector to promote R&D in coordination with governments and related partnerships.</p> <p>8. Leveraging adequate, efficient financing for human capital: To strengthen public finance for human capital investments, support IDA operations in at least 20 IDA countries, of which eight are among those IDA countries with the lowest HCI through policy or administrative reforms impacting (i) the availability of resources, and/or (ii) the efficiency of expenditure management and/or (iii) the results-orientation of human capital investments.</p>	
Save the Children – Richard Watts	Save the Children welcomes the creation of the human capital special theme within IDA20, and its promise to prioritise children and youth. It is encouraging to see the report recognises that children make up the most significant demographic in IDA eligible countries, and whose lives have been most impacted due to COVID-19 pandemic.	

Organization	Comments	Response/Action
	<p>Health</p> <p>Save the Children welcomed the frontloading of IDA19 resources and their channelling toward the response to COVID-19, particularly in investments in health systems and vaccine rollout and delivery. We also welcome the ambition to continue this focus within IDA20, given the significant challenge of vaccinating the world against COVID-19, the risks associated with other variants and the need for broader health systems strengthening across IDA countries. The World Bank’s commitment to support all IDA countries with COVID-19 vaccinations and pandemic preparedness is important. Whilst IDA can play a significant role, the Deputies’ report rightly highlights that the World Bank cannot act in a silo, and partnerships are key. Although the World Bank has looked to foster partnerships after initial challenges with its vaccine delivery, we feel that given the likely scale of financing through IDA20, the Deputies report could further detail its approach to ensuring its health funding is effective and efficient, and ensure investment is guided by its partnership model. A particular focus on increasing support for health systems strengthening under IDA20, including through the ACT-A Health Systems Connector Pillar, is critical.</p> <p>We also welcome the increased allocation to the Regional Window (RW), which will provide additional non-country allocable resources for pandemic response. There will need to be significant sensitisation of IDA governments towards optimal utilisation of the RW in this way, space for dialogue, and capacity support on project formulation. We suggest that the Deputies’ report acknowledges this and states that the World Bank will provide support as required.</p> <p>Education</p> <p>The COVID-19 pandemic continues to have a profound negative impact on child learning, particularly for those living in IDA eligible countries. A key reason for this has been the lack of infrastructure across many IDA countries for remote learning prior to the pandemic, and limited resources to invest during it. The significant financing gap to attain education related SDGs before the pandemic has now grown significantly, due to increased costs getting children safely back to school, as well as the necessary investments to recover lost ground in learning. Within this context, we welcome increased IDA funding to education, at a time when other donors have reduced their aid contributions to the sector. However, IDA20 needs to go further. Firstly, there needs to be increased direct investment in education under IDA20, as governments continue to struggle to find fiscal space to do so themselves. Alongside this, due to the decrease in learning outcomes across IDA countries, the commitment to focus on addressing learning poverty in at least 20 countries doesn’t go far enough. At the very least it should aim to match the commitment on children’s early years, which is at least 30 countries. In addition, we would like to see a specific commitment on the minimum number of countries where students will be supported within ‘Supporting core social service delivery systems’, and to increase the ambition beyond 10 countries that are fragile and conflict-affected states.</p> <p>Nutrition</p> <p>We welcome the recognition with the Deputies’ report that IDA is now one of the leading providers of international public finance to nutrition, and the important role the World Bank</p>	<p>Partnerships are indeed an important part of the response. With respect to the ACT-A collaboration, IDA will help countries tap into available resources to finance their country-led response by providing a platform for coordinating support. At the same time countries will be able to tap into resources from the ACT-A HSRC pillar and other sources to finance their priorities for COVID-19 response across the interventions for vaccination, prevention, treatment and support. The main challenge is to ensure that at country level, the countries tap into available resources from HSRC in response to the specific needs and gaps.</p> <p>There has been significant support for the increased allocation to the Regional Window for pandemic response. IDA country and practice teams stand ready to assist and advise IDA clients in accessing the Regional Window resources.</p> <p>Regarding your comment on education, the targets were obtained by reviewing the project portfolios to identify the number of countries that can be expected to have new projects approved during the IDA20 cycle; thus, these numbers are different for early childhood education and basic education projects that can measure and address learning poverty or address return-to-school and learning recovery challenges.</p> <p>On nutrition, the Human Capital Index (HCI) score has a nutrition related indicator as one of its core elements. The</p>

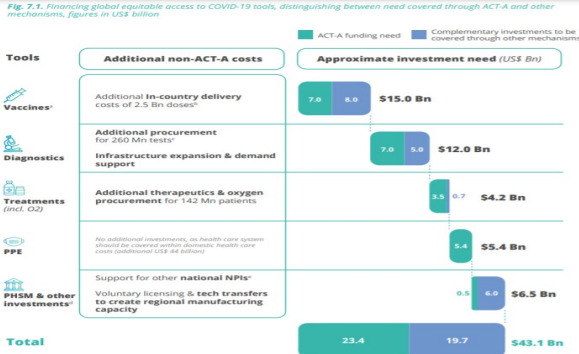
Organization	Comments	Response/Action
	<p>plays in supporting millions of children to thrive. In addition, we welcome the specific commitment on nutritional service within the human capital theme, as well as a recognition with the Crisis preparedness cross cutting issue of the vital role good nutrition can have in famine prevention. However, given the essential crosscutting benefits nutrition has in a child's development, we would like to see the commitment on Investing in children's early years guarantee that IDA20 will support at least 30 countries with nutrition and maternal services, and not including one or the other. In addition, whilst we welcome that 15 of the 30 countries will be focused on those with the lowest human capital, the focus of countries should not solely be decided by the overall index score, but based on specific nutritional needs, measured both nationally and sub-nationally. Lastly, we feel the RMS indicator solely on stunting is inadequate to understand acute malnutrition and agree with ICAN's past recommendation to also include an indicator on wasting.</p> <p>Leveraging adequate, efficient financing for human capital Whilst we welcome the commitment on 'Leveraging adequate, efficient financing for human capital', we feel it focuses too much on the amount, efficiency, and optimal use of public resources, and fails to mention equity. Progress towards the SDGs will require resources to get to the poorest and most vulnerable, and public finance has a clear comparative advantage over other forms of development finance in achieving this. Therefore, a key ambition under IDA20 should be to work with Government to not only look at the optimal and efficient use, but also to consider this alongside ensuring no one is left behind.</p>	<p>HCI is appropriate to the multi-sectoral early years policy commitment. On the ambition, this is based on realistic assessment of the pipeline with added ambition.</p> <p>The RMS is limited in the number of indicators it can include. Data on wasting is readily available to the public through the World Development Indicators. IDA country programs, in partnership with IDA clients, are fully focused on all aspects of nutritional needs.</p> <p>On financing for human capital, please refer to our response to ODI.</p>
Sightsavers	<p>Clearly defining inclusion We welcome the focus on 'inclusion' throughout the Deputies report and the recognition that this is central to COVID-19 recovery. However, we are concerned that without a clear definition it will be challenging to assess the extent to which these actions are inclusive. For example, Commitment 3 in the Climate Change Special Theme commits to developing 'inclusive climate policies' and Commitment 1 in the Human Capital Special Theme commits to 'advanc[ing] inclusive health systems.'</p> <p>We suggest adding a footnote which defines what inclusive/inclusion will mean in terms of meeting these commitments. This should, at a minimum, clarify that these systems and policies should reach and be accessible to "vulnerable and disadvantaged groups," as defined by the World Bank's <i>Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups</i>.</p> <p>Number of countries in Human Capital commitment 6 We welcome Policy Commitment 6 on expanding access to core services for people with disabilities and thank the Deputies for taking on feedback on strengthening the language of the commitment.</p> <p>We are concerned, however, that the level of ambition in the commitment is not sufficient considering the importance of disability inclusion for an inclusive recovery. As the report</p>	<p>Thank you for this comment. The World Bank defines inclusion as "the process of improving the ability, opportunity, and dignity of people, disadvantaged on the basis of their identity, to take part in society". The commitment under Climate Change identifies informal workers and children as particular target groups, however, even among those groups, some will be at greater risk of exclusion than others, such as persons with disabilities, sexual and gender minorities, and Indigenous Peoples and Ethnic Minorities. Additionally, the Environmental and Social Framework (ESF) commits Bank staff to work against discrimination toward any project-affected individuals and groups, and in particular identifies "age, gender, race, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation and gender identity, economic disadvantages or indigenous status, and/or dependence on unique natural resources" as common grounds for exclusion (see Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups).</p>

Organization	Comments	Response/Action
	<p>highlights, this commitment is in line with the Environmental and Social Framework. Given this and the importance of the area, we believe that the number of countries should be significantly increased.</p> <p>Human capital commitment 5</p> <p>We welcome that policy commitment 6 specifically includes education as one sector in relation to disability, we are concerned that policy commitment 5 does not explicitly reference disability.</p> <p>We suggest that policy commitment 5 should specifically reference disability. The World Bank has recognised that the gaps in education between different groups are significant and growing, including for children with disabilities. Commitment 5 should commit to disaggregate by disability in addition to sex and should also specifically measure learning gaps to ensure a focus on reducing inequalities.</p>	<p>Regarding the policy commitment on disability inclusion, the target of 18 has been determined on the basis of the currently known pipeline under these sectors.</p> <p>It would be extremely difficult to provide disability disaggregation for large-scale learning assessment results for two reasons: i) it would require an accurate diagnosis / description of disability and the extent to which this disability affects the student’s ability to take or perform well on a large-scale assessment; and ii) universal design principles would imply provision of necessary accommodations to students with disabilities, which would aim to neutralize or at least attenuate the disparity in performance that is due to the disability itself, thus, if done right, rendering disaggregation by disability not very informative. For these reasons, disaggregation by disability status is not done even in the most established large-scale assessments (e.g. PISA, PIRLS, TIMSS), even in developed country contexts. However, if such disaggregation becomes available in the future, we will be sure to capture this information.</p>
UNICEF	<p><i>Areas of Support</i></p> <ul style="list-style-type: none"> • UNICEF agrees that an inclusive recovery requires a renewed commitment and scale-up of investments in human capital, particularly for children, women and families. The report’s focus on child development, specifically the calls to enhance access to quality early years services and nutrition, is most welcomed. Additionally, UNICEF supports the report’s inclusion of the importance of vaccine equity and reducing learning poverty to ensure the safe return to school for all children. • UNICEF appreciates the report’s recognition of the need to enhance commitments to families and households who continue to be omitted of critical social protection programs, particularly informal workers in urban contexts and those living in FCV contexts • The report’s explicit reference and commitment to building “adaptive social protection systems” as a core strategy to ensure inclusive recovery is appreciated. 	<p>Thank you for the positive comments and specific suggestions. Policy Commitment #4 on adaptive social protection will be revised to prioritize the poorest and most vulnerable population, which often includes children.</p>

Organization	Comments	Response/Action
	<p>UNICEF is prepared to work with IDA to build and strengthen social protection and humanitarian cash transfers in fragile and emergency contexts.</p> <ul style="list-style-type: none"> • UNICEF supports the inclusion of MHPSS under the Human Capital Special Theme (in the context of the COVID-19 response and health system strengthening), in addition to the reference to psychosocial support included in the Gender and Development pillar (in relation to gender based-violence (GBV) prevention and response). <p><i>Suggestions</i></p> <ul style="list-style-type: none"> • UNICEF suggests strengthening the report’s focus on closing gaps of social protection coverage for children, and scaling up elements of inclusion, as a critical pillar for effective human capital development. <ul style="list-style-type: none"> ○ Specifically, UNICEF requests consideration of including language in support of countries moving toward universal coverage and child grants. Additional consideration to strengthening the narrative on the use of multipurpose cash response in areas with functioning markets would be welcomed. This would align with the emphasis on early childhood development and child development, as ensuring access to social protection improves access to services that meet children’s basic needs. • IDA has a critical role to play in helping to close the global vaccination divide, as such, UNICEF suggests a few clarifications and additions to the report: <ul style="list-style-type: none"> ○ Further consideration may be given to considering the costs and financing of vaccine delivery as a key part of IDA’s strategy. Given the risk of continued inequities in the rollout of COVID- 19 tools, UNICEF – together with partners, such as the World Bank – has undertaken costing analysis to better understand the costs of COVID-19 vaccine delivery under different scenarios which may be helpful in these efforts. ○ Efforts to reinforce countries’ cold chains to address bottlenecks may be further emphasized. ○ Suggest differentiating between country systems that can support the procurement and deployment of COVID-19 vaccines and those that require further assistance to address gaps. Further clarification is needed to differentiate between vaccine deployment interventions and prevention/treatment interventions. 	<p>On universal coverage: Please see above for response re: universal coverage.</p> <p>On vaccines: Given the uncertainties in the COVID-19 vaccines market, the World Bank will continue to work with partners, including UNICEF, to keep updating costs and financing of vaccine delivery to inform and update financing in countries.</p> <p>The Deputies’ Report provides the strategic priorities for IDA20. Details on strengthening country capacities including cold chains and other critical areas as well as specificities of country procurement systems (and gaps) and interventions for vaccine deployment, prevention, and treatment will be elaborated in the design and implementation of individual operations.</p> <p>On back to school learning approaches, this is covered under Policy Commitment #3 clause “students’ return to school</p>

Organization	Comments	Response/Action
	<ul style="list-style-type: none"> Given the significant impact of COVID-19 to education globally, UNICEF suggests further emphasizing accelerated/back to school learning approaches for all out of school children, not only focusing on girls, but using a gender sensitive approach. To recognize the multidimensional nutritional challenges IDA countries face, UNICEF notes references to famine may oversimplify the problem and suggests incorporating language such as “nutritional crises” as many countries may struggle with severe food insecurity but not reach the stage of official famine designation. Further, it is important to recognize that famine relates to both food insecurity and WASH, given the links to drought. UNICEF suggests that the commitment to expand access to persons with disabilities is strengthened to include a focus on data. Thus, strengthening the ability to implement principles with a better understanding of persons with disabilities. That is, making the disabled and their needs more ‘visible’ through data so that we know who they are, what their challenges are and where they live. Given the commitments related to “building adaptive social protection systems, including the use of digital technologies,” UNICEF suggests including reference to a focus on developing/operationalizing single/social registries which is the foundation for adaptiveness, as well as introducing or strengthening social protection/cash coordination bodies. 	<p>and accelerated recovery of learning losses.” We agree with emphasizing the gender-sensitive approach in identifying and addressing constraints to return-to-school and agree that it is important to identify any groups at the risk of exclusion.</p> <p>We will review the Deputies’ Report to see how to capture your point on famines.</p> <p>See response above for data on disability.</p> <p>We agree on the importance of developing integrated registries as one of key elements of adaptive social protection building blocks, as explained in the paper.</p>
Wemos	<p>It is good to see in the first (new) policy commitment under special theme Human Capital, that the terms ‘health security’, ‘UHC’ and especially ‘inclusive health systems’ have moved to the front of the sentence. These have now gotten the rightful status of being the objective of this policy commitment, then followed by emphasis on pandemic response and preparedness which is natural considering the multiple crises caused by the pandemic.</p>	<p>Thank you very much for the positive feedback.</p>
Save the Children – focus on ACT-A	<p>IDA priorities – as per the draft IDA20 Deputies' Report</p> <p>It is clear from the report that the bank is hoping that their work through the HSRC would enable the world to build back better, accelerate the vaccine rollout, and boost pandemic preparedness for future pandemics. Furthermore, as per the bank’s Human Capital Special Theme Policy Commitments, the bank is looking to support IDA countries to strengthen health security and advance inclusive health systems and universal health coverage.</p> <p>Although the bank is co-leading on the ACT-A HSRC, it is unclear if the connector is working towards the same objectives as the bank.</p> <p>Health System and Response Connector – Strategy vs Budget</p> <p>The narrative in the strategy highlights the objective of the connector is to ensure countries have the – necessary technical, operational, and financial resources, to translate new COVID-19 tools into national response interventions.</p>	<p>Thank you for the detailed comment on the strategy and budget of the ACT-A Health System and Response Connector. IDA’s support to vaccine rollout follows the country-based model to support countries, and operations funded by IDA help countries tap into available resources to finance their country-led response by providing a platform for coordinating support. Thus, while the HSRC may be structured vertically at the global level, countries will be able to tap into resources from the ACT-A HSRC pillar and other sources (including IDA) to finance their priorities for responding to the COVID-19 crisis across the interventions for vaccination, prevention, treatment and support. The main challenge is to ensure that at country</p>

Organization	Comments	Response/Action								
	<p data-bbox="321 134 1234 159">Below are some of the HSRC’s objectives and activities lifted from the strategic plan:</p> <p data-bbox="321 191 590 215">Table 1: HSRC activities</p> <table border="1" data-bbox="321 240 1339 1435"> <thead> <tr> <th data-bbox="321 240 573 272">Priorities</th> <th data-bbox="583 240 1339 272">Activities</th> </tr> </thead> <tbody> <tr> <td data-bbox="321 280 573 581">1. 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	<p data-bbox="583 133 1283 188">safe functioning of health systems and the safe use of COVID-19 tools</p> <p data-bbox="319 224 1339 373">The HSRC provides support to a vertical programme, limiting its role in health systems strengthening and pandemic preparedness at a time when this is essential. In addition, the extent to which the connector is providing vertical systems support is also unclear. A budget analysis has been carried out to assess the level of effort that has been assigned to each of the activities outlined in table 1.</p> <p data-bbox="319 409 695 435">Table 2: HSRC budget breakdown</p> <table border="1" data-bbox="323 457 1073 737"> <thead> <tr> <th></th> <th>Millions</th> <th>Percent</th> </tr> </thead> <tbody> <tr> <td>Tracking gaps</td> <td>204</td> <td>3%</td> </tr> <tr> <td>PPE</td> <td>5,011</td> <td>85%</td> </tr> <tr> <td>Essential health services support</td> <td>165</td> <td>3%</td> </tr> <tr> <td>Dx/Tx support</td> <td>220</td> <td>4%</td> </tr> <tr> <td>Running costs/ Management fees</td> <td>297</td> <td>5%</td> </tr> <tr> <td>Total</td> <td>5897</td> <td>100%</td> </tr> </tbody> </table> <p data-bbox="319 773 1339 954">Although this analysis has not been discussed as of yet with the HSRC PMO team, the bulk of the HSRC budget (85%) seems to be spent on procuring PEE to protect essential health workers. This is in contrast with the narrative in section 3.4 of the ACT-A strategy, which includes protecting the health force as part of its priorities but not explicitly in proportion to how its currently presented in the budget. Figure 7.1 in the revised ACT-A strategy also suggests that the HSRC is in fact a pillar focusing on procuring PPE – along with the majority of the budget.</p> <p data-bbox="319 987 873 1013">Figure 1: Figure 7.1 from the ACT-A strategic plan</p>  <p data-bbox="344 1016 919 1032">Fig. 7.1. Financing global equitable access to COVID-19 tools, distinguishing between need covered through ACT-A and other mechanisms, figures in US\$ billion.</p> <table border="1" data-bbox="344 1042 919 1367"> <thead> <tr> <th>Tools</th> <th>ACT-A funding need (US\$ Bn)</th> <th>Complementary investments to be covered through other mechanisms (US\$ Bn)</th> <th>Total (US\$ Bn)</th> </tr> </thead> <tbody> <tr> <td>Vaccines*</td> <td>7.0</td> <td>8.0</td> <td>15.0</td> </tr> <tr> <td>Diagnostics</td> <td>7.0</td> <td>5.0</td> <td>12.0</td> </tr> <tr> <td>Treatments (incl. O2)</td> <td>3.5</td> <td>0.7</td> <td>4.2</td> </tr> <tr> <td>PPE</td> <td>5.4</td> <td>0.0</td> <td>5.4</td> </tr> <tr> <td>PHSM & other investments</td> <td>0.5</td> <td>6.0</td> <td>6.5</td> </tr> <tr> <td>Total</td> <td>23.4</td> <td>19.7</td> <td>43.1</td> </tr> </tbody> </table> <p data-bbox="344 1386 919 1435">Notes: (a) No additional vaccine procurement costs included, as substantial risk mitigation budget already costed for this purpose as part of the COVAX facility. (b) WHO Strategy to Achieve Global COVID-19 Vaccination by mid-2022. (c) Procurement need beyond ACT-A to achieve 100 tests per 100,000 inhabitants per day in all 144 Diagnostics consortium countries. (d) Public health and social measures, based on IMF estimates of costs of non-pharmaceutical interventions (US\$ 4 Bn) and voluntary licensing and technology transfers to create regional manufacturing capacity (US\$ 1 Bn) for vaccines, raised to US\$ 2 Bn to include manufacturing scale-up for other tools. IMF (2021), & https://www.imf.org/en/Topics/health/health-services. (e) Non-pharmaceutical interventions.</p>		Millions	Percent	Tracking gaps	204	3%	PPE	5,011	85%	Essential health services support	165	3%	Dx/Tx support	220	4%	Running costs/ Management fees	297	5%	Total	5897	100%	Tools	ACT-A funding need (US\$ Bn)	Complementary investments to be covered through other mechanisms (US\$ Bn)	Total (US\$ Bn)	Vaccines*	7.0	8.0	15.0	Diagnostics	7.0	5.0	12.0	Treatments (incl. O2)	3.5	0.7	4.2	PPE	5.4	0.0	5.4	PHSM & other investments	0.5	6.0	6.5	Total	23.4	19.7	43.1	
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Organization	Comments	Response/Action
	<p>According to the strategy, in addition to providing PPE to protect 2.7 million health care workers, the HSRC also aims to:</p> <ul style="list-style-type: none"> - Strengthen national response mechanisms - Overcoming health systems bottlenecks and barriers - including gender barriers - Maintain other essential health services - Support integrated service delivery platforms <p>As an example, only 3% of the budget is attributed to tracking gaps to access the COVID-19 tools at country level, which is insufficient considering the global reach of this programme. In addition, this is in sharp contrast to the amount budgeted for running costs and management costs, which amount to 5% of the budget. We do recognise that a substantial amount of this is for the running, logistical, and procurement arrangements of the other COVID-19 tools – however the allocation further deprioritises the health systems focus of the HSRC.</p> <p>Clearly there is a great need for redistribution of these resources across all the functional areas to be able to fully deliver on each aspect of the connector's priorities, contribute to IDA commitments, and go beyond just procuring and providing commodities.</p> <p>Some questions to consider whilst finalising the IDA20 Deputies' Report</p> <ul style="list-style-type: none"> - It is unclear, with the limited budget associated with the priorities bulleted above, how they these objectives will be resourced, or if indeed these are a priority for the HSRC? - To what extent is this pillar another commodities pillar (PPE) in comparison to its health systems support role? <p>The sustainability of the investments has not been addressed – to which extent will the work of the HSRC contribute to pandemic proofing and strengthening health systems – and to what extent does this contribute to IDA’s policy commitments?</p>	
WHO	<p>Summary of comments provided by the WHO:</p> <p>Antimicrobial resistance and Non-communicable diseases</p> <p>We have suggestions to have the narrative align as closely with Human Capital PC#7 by adding the issue of growing antimicrobial resistance. We would like to see addition of systems to address microbial resistance; One Health approaches that include through the effective implementation of multisectoral national action plans on addressing antimicrobial resistance. On page 5 para 12, acknowledge that COVID-19 has also severely impacted the multisectoral response to addressing antimicrobial resistance. Further, in Box 3.2 supporting food and nutrition security in para (v) we suggest that on improving food safety and hygiene in food distribution channels, add including through addressing antimicrobial resistance in agriculture and animal food production. Also, IDA’s commitment to enhancing pandemic preparedness and</p>	<p>Thank you; the Deputies Report will include reference to antimicrobial resistance when discussing efforts to increase coordination to prevent and prepare for emerging infectious diseases.</p>

Organization	Comments	Response/Action
	<p>prevention should include approaches that address antimicrobial resistance. Please see attached pdf with specific reference points.</p> <p>Suggestion to include reference to people living with non-communicable diseases who are more susceptible to the risk of developing severe COVID-19 symptoms and are among the most affected by the pandemic, as well as to refer to tuberculosis alongside maternal and child mortality, and malaria when discussing global health challenges.</p> <p>Mental Health Under the theme Human Capital, in the section on COVID Response and health system strengthening (page 44) we suggest adding the text in bold: <i>“IDA support will also include mental health and psycho-social support to address the additional strain that the pandemic has placed on many individuals, households and communities.”</i></p>	<p>Reference to tuberculosis was included. On Tier 1 indicator on TB incidence, please note that this is already well-reported through other mechanisms.</p> <p>Thank you for the suggestion. Given that mental health is covered under the Human Capital Special Theme, a reference to IDA FCS will be included under the Human Capital Special Theme section of the Report, rather than including a reference to mental health when discussing FCV.</p>

Special Theme: Climate Change

Organization	Comments	Response/Action
Youth Initiative for The Promotion of Good Leadership	<p>The impact of COVID-19, climate crises with the compounding effect, include increased food insecurity and migration, widespread health and education disruption and job losses are occurring across Nation State, income capital, public borrowing weakening IDA countries economy performance and their capacity to service and repay public debt.</p> <p>Climate change impact undermine development and affect most vulnerable countries, economic damages, fragile and conflict affected situation, countries face high climate risk and IDA Countries need a rapidly changing Global economy that increase value green growth, green Job and green Sector countries need to work to address climate impact, strengthen their resilience to shocks and look new opportunity to thrive in post COVID.</p> <p>IDA must focus enhancing and conserving ecosystem service through nature-based solution driving low carbon, resilient transition bin key system and increasing access to renewable energy supporting biodiversity services bon Ocean and landscape management, disaster risk water and infrastructure.</p>	Noted with thanks.
SDG2 Advocacy Hub	<p>Pg. 56, rec. 3 <i>Transitioning key systems for adaptation and mitigation: Support at least 50 countries (including atleast 20 FCS) to develop inclusive climate policies and increase investment in climate adaptation and mitigation in at least one key transition system (i.e., agriculture, food, water, and land; cities; transportation; and/or manufacturing), including community-led climate investments in at least 15 countries.</i></p> <p>Given the urgency of IDA countries to adapt to climate change, it would be better to have</p>	Thank you for sharing your views. Transitioning these key systems is prioritized because these systems contribute the most to emissions and face significant adaptation challenges at the same time. For this reason, having separate policy commitments for adaptation and mitigation would count the same operations twice.

Organization	Comments	Response/Action
	<p>separate policy commitments for adaptation and mitigation. It is crucial that agriculture and foodsystems in all IDA countries are supported to adapt to changes already underway.</p> <p>Pg. 51 Para 99: “IDA will support the transition of agri-food sectors through robust policy and technology-informed interventions for crops, including through climate-smart agriculture technologies and practices, and livestock to build resilience and reduce emissions.”</p> <p>The way this sentence is written, it appears to focus solely on technology and not on agroecological and regenerative techniques/approaches—an emerging priority coming out of UNFSS and COP 26. It would also be good to reference supporting smallholder farmers and SMEs in adopting climate smart approaches.</p>	<p>Thank you for your comment. We agree with the importance to emphasize that “The WBG will step up support for climate-smart agriculture across the entire agriculture and food value chains, including the blue economy, via policy and technological interventions, using nature-based solutions where appropriate.”</p>
Bank Information Center	<p>We support the prioritization of nature-based solutions under the Climate Change Special Theme in the IDA20 Draft Deputies Report, recognizing the benefits these policies and projects have both in reducing GHG emissions and increasing resilience to climate impacts. However, we encourage IDA to better integrate forests, forest peoples, and local communities throughout its climate commitments, specifically those on nature-based solutions. When indigenous communities and forest peoples manage critical ecosystems, there is a lower rate of deforestation, and landscapes are more biodiverse, store more carbon, and benefit more people. We encourage IDA Deputies to raise the ambition of PC 6 and 7 under the Climate Change Special Theme to feature the critical role of indigenous and local communities as ecosystem stewards to implement and realize the full potential of nature-based solutions. We suggest the following language (in bold) below be added accordingly:</p> <p><i>Climate Change</i></p> <p>6. Enhancing biodiversity and ecosystem services: Implement nature-based solutions in coordination with indigenous communities, including landscape, seascape and watershed restoration and management or forest conservation, restoration and sustainable forest management, in at least 20 countries to support biodiversity and ecosystem services.</p> <p>7. Support at least 20 countries to engage local communities and other stakeholders in implementing integrated and sustainable management of freshwater, coastal and marine ecosystems, including addressing marine resource depletion and plastic pollution.</p>	<p>Thank you for highlighting the role played by indigenous and local communities in mitigating climate change impacts. IDA20 is fully aligned with the three principles of the WBG Climate Change Action Plan 2021-2025, which focus on people, nature, and partners. People must benefit from the transition to a low-carbon and resilient future. People are at the center of climate action and need support in managing the transition and the changes that come with climate-focused policies. A people-centered approach is essential for the political feasibility of climate action and to ensure that gains and losses from the transition to a low-carbon, resilient economy are shared equitably. This approach requires citizen engagement and participatory processes that consider diverse viewpoints, including gender. Natural capital is critical to address climate change. Conserving natural capital, including biodiversity and ecosystem services, can contribute significantly to both mitigation and adaptation.</p> <p>In line with the Joint Statement on Nature, People and Planet, where possible, countries will be supported to develop appropriate policies, investment frameworks and agreements that better value and enhance natural assets for the benefit of all people, including women, vulnerable and marginalized populations while supporting climate and nature goals. In addition, all investment projects will apply the ESF, which recognizes the importance of open and transparent engagement with stakeholders as an essential element of good international practice. Therefore, engagement with stakeholders, which include local</p>

Organization	Comments	Response/Action
		communities, is implicit and thus does not require explicit mentioning.
Oxfam International	<p>We welcome the strengthening of the language in the narrative that recognizes the need to integrate climate adaptation and mitigation into national planning and investments. However, to ensure greatest impact the World Bank must fully link its analytical work to its operations and country engagement by committing to incorporate Country Climate and Development Reports (CCDRs) and/or Nationally Determined Contributions (NDC)-based results indicators in the development of IDA Country Partnership Frameworks (CPFs), which guide the World Bank’s support and selection of projects for member countries over a three-five-year period. We also welcome the increase of support from 40 to 50 countries to develop, update and/or implement theirNDCs or Long-Term Strategies (LTSS); however, it is also critical that the Bank supports countries to integrate their NDCs or LTSS into national budgets and expenditure frameworks, and to facilitate a just transition away from fossil fuels.</p>	<p>Noted with thanks. The WBG will take a “whole of economy” approach that focuses on policies and plans to create the enabling environment for climate action. Beyond greening projects, the WBG will support the greening of entire economies, including embedding climate priorities in country macroeconomic frameworks that guide fiscal policy and major national investments and account for their climate benefits and risks; and integrating climate planning into national budgets and expenditure frameworks to provide adequate budgetary support for climate action, optimize the overall allocation of public resources, and unlock private financial flows.</p>
Save the Children – Richard Watts	<p>Climate changes poses the biggest threat to children alive today and in the future, so we welcome the commitment to increase financing of climate co-benefit to 35% of IDA20’s portfolio, which will hopefully lead to a significant monetary increase in climate finance if IDA20 receives adequate donor contributions. However, whilst the commitment to increase adaption to at least 50% is welcome, this should be a floor and not a ceiling. As the World Bank’s most concessional arm, IDA is well-placed to support adaptation where other forms of finance cannot, as an area that has been critically underfunded in climate financing overall and that many IDA eligible country government in COP26 were calling to be prioritised.</p> <p>We have concerns about the commitment to only track climate indicators for projects with more than 20% of climate co-benefits. This is because almost half of IDA’s climate marked projects in 2020 had less than 20% climate co-benefits, meaning there is a significant risk that much IDA climate financing will not be tracked though the RMS.</p> <p>In addition, whilst many of the climate policy commitments are welcome, it was disappointing to see there was no commitment on broadening IDA’s climate funding to more countries. In 2020 two-thirds of IDA’s climate funding went to just eleven of the fifty-nine IDA only countries. Many IDA eligible countries most at risk from climate change saw little or no funding. There is an urgent need to rectify this within IDA20.</p>	<p>Thank you for raising this concern. We would like to take the opportunity to clarify that, by design, there are some projects that do not have significant climate co-benefits, as is the case for financing school or vaccine supplies, for example. For this reason, it is not appropriate to track operations that have less than 20% climate co-benefits.</p>
UNICEF	<p><i>Suggestion</i></p> <ul style="list-style-type: none"> • Suggest including references to “environmental degradation” and linking its impacts to climate change throughout the section. 	<p>We will consider language on environmental degradation to emphasize that biodiversity and climate change are closely interlinked, with terrestrial and marine ecosystems serving as critically important carbon sinks, while climate change acts as a direct driver of land degradation, biodiversity, and ecosystem services loss. Recognizing this, IDA20 connects the climate and biodiversity agendas</p>

Organization	Comments	Response/Action
		and seeks to exploit synergies between them, to support a green, resilient, and inclusive development in IDA countries.

Special Theme: Fragility, Conflict and Violence

Organization	Comments	Response/Action
Youth Initiative for The Promotion of Good Leadership	<p>IDA to broaden its program that seeks to enhance peace and mitigate the impact of conflict and violence and support humanitarian development. Focus on comprehensive dialogue and engagement with stakeholders and development partnering humanitarian security mediation, diplomacy domain, which is important innovation through engagement on fragility conflict violence.</p> <p>Look into challenges confronting refugees, constrained in policies implementation of refugee, lack of budget, funding or resources, lack of institutional capacity, lack of coordination between nations at the local level, gap in awareness of relevant policies by authorities, lack of access to asylum, justice system barrier resulting from administration requirements, unstable security situation and general lack of economic development, job and infrastructure community. Support refugee education and health, effective access to labor market. Mitigate the shock caused by refugees inflow and create social and economic development opportunities for refugees host communities and maintain support on refugee implementation policy.</p>	Thank you for noting all these issues, including challenges faced by refugees. They are all very important and part of IDA's engagement within its mandate. The FCV Strategy clearly outlines the road ahead in these areas. IDA20 will continue to strengthen support on several of these challenges.
SDG2 Advocacy Hub	<p>Pg. 60 para 114. “Participants supported IDA20 simultaneous focus on addressing drivers of FCV and COVID-19 crisis response and recovery priorities. Achieving green, resilient, and inclusive development outcomes in IDA FCS will continue to require a differentiated and tailored approach. The IDA20 Special Theme of FCV is fully aligned with the FCV Strategy and includes a deliberate focus on (a) rebuilding human capital, including education, supporting vaccine deployment, and investing in shock responsive social services; (b) strengthening core governance functions and institutions for service delivery and enhanced capacity to prepare for and respond to crises; (c) creating jobs and economic opportunities for economic recovery and building social cohesion; (d) helping address tensions related to natural resources and environmental impacts in the face of climate change and food insecurity; and (e) closing gender gaps as a critical element of FCV prevention, focusing on women's empowerment and agency, and ensuring inclusion of vulnerable and marginalized people and communities (including people with disabilities) in our efforts to recover from crisis and address FCV challenges”.</p> <p>This paragraph should also mention the importance of supporting agricultural production and smallholder farmers as a means of preventing conflict, rebuilding livelihoods after a crisis, and ensuring the food security and nutrition of populations affected by conflict or crisis. Missing one harvest due to a crisis is very challenging for smallholders as they lose their investment and income. Missing multiple harvests because of lack of resources and support can be a devastating setback, making it difficult to ever recover.</p>	<p>The different ‘buckets’ outlined in the said paragraph are aligned with the FCV Strategy. Agriculture and support to smallholder farmers is indeed important and as appropriate in each context could fall under broader points c (economic opportunities), d (natural resource/food security), and e (vulnerable communities).</p> <p>The Report will include a reference to agriculture where suggested.</p>

Organization	Comments	Response/Action
Care International	<p>Even before COVID, we knew that women and girls were among the most adversely impacted during conflict due to underlying gender inequalities and discriminatory social norms. But in many fragile and conflict affected states (FCS), like Syria, years of conflict have decimated the health system, and recent spikes in COVID-19 cases are affecting the ability of women and adolescent girls to access sexual and reproductive health services, including maternal health, sometimes with deadly consequences. CARE has also documented that in some FCS like South Sudan, women have lower rates of vaccination, have less access to health information and vaccine delivery services, and greater levels of vaccine hesitancy than men.</p> <p>It is therefore welcome to see IDA20's commitment to address uneven vaccine rollout, accelerate its vaccine distribution, strengthen pandemic preparedness, and build the resilience of health systems. However, in order to address gender gaps exacerbated by COVID-19 and to reach the most vulnerable first, FCS should be prioritised above other IDA countries (p.49, Rec.5, the target is at least 40 IDA countries, and of them, only 10 would be FCS).</p> <p>Another critical area for investment to build resilient and inclusive health systems is in frontline health workers, 70% of whom are women. They must be fairly paid, well trained and adequately supported so they are able to do their jobs effectively and safely, and these costs need to be built into vaccine delivery plans and budgets. This will also further the goal of centering women's rights, needs and voices at the heart of our COVID response, which we know is critical to its success.</p> <p>Specifically, IDA 20 should:</p> <ol style="list-style-type: none"> 1. Address the funding delivery gap and increase funding for vaccine delivery as a priority. The World Bank is currently funding \$1.2 billion in vaccine <i>delivery</i>—10% of the total funding allocated for COVID-19 recovery. If that trend applies to the rest of the \$20 billion commitment, World Bank funding will cover at most \$4 billion, falling far behind what is needed as part of the \$9 billion that ACT-A estimates as the lowest possible investment to vaccinate 70% of the world's population. IDA should include a commitment to last mile delivery of vaccines (or 'tarmac to arm' delivery), in Para.86, and increase focus and funding on vaccine delivery. 2. Include investment in frontline health workers in the cost of vaccine delivery in order to build resilient and inclusive health systems that can withstand future pandemics. Paragraph 93.1 (p.49) should add a section iii that refers to the health workforce - especially the 70% of frontline health workers who are women--as drivers of economic growth and pandemic preparedness/health systems strengthening when they are fairly paid, well trained and adequately protected. Only a quarter of vaccine agreements (15 of 60 agreements) detail provisions to pay health workers. 3. Elevate women's and girls' leadership to a standalone recommendation: The UN Secretary-General has repeatedly called for women and girls and the organisations that 	<p>We agree that it is important to pay attention to vaccination gaps across and within countries, especially the need to reach the most vulnerable groups including in IDA FCS. Overall, many IDA countries are still at very low levels of COVID-19 vaccination. IDA's support to health system strengthening, vaccine rollout, and pandemic preparedness will therefore continue to be a major priority in IDA20. IDA's support will be demand driven and target <i>all</i> IDA countries, including IDA FCS. The sub-target of supporting 10 IDA FCS relates to the policy commitment on supporting core social service delivery systems. We believe this is an ambitious and realistic target for IDA20.</p> <p>While IDA financing is accessed through a demand-driven process, Bank management has placed emphasis on delivery of support to countries' response to the COVID-19 vaccination effort. In addition to financing the response to COVID-19 through country allocations, IDA20 will provide access to the Regional Window and Scale-Up Window to support COVID-19 vaccinations.</p> <p>IDA20 is supporting both acquisition and deployment of vaccines with the latter encompassing support to strengthening all key areas of health systems to deliver on this effort. Human resources are a central feature of the response and details of support will be outlined in individual country operations based on their needs.</p> <p>Please see Special Theme Gender and Development.</p>

Organization	Comments	Response/Action
	<p>represent them to be at the centre of all decision-making processes that will impact their lives, especially when it comes to COVID-19 response plans and process to ‘build back better’. This should be made explicit in a standalone recommendation on p.49.</p>	
<p>Save the Children – Richard Watts</p>	<p>We welcome the commitment to maintain the funding level of the Window for host communities and Refugees. This window is a vital source of international public financing to support in refugee situations. Under IDA19 all resources within WHR are expected to be utilised. Therefore, with emerging crisis situations now and likely throughout IDA20 there needs to be continual assessment of the WHR, and an increase in its allocation if needed. In addition, the crisis in Afghanistan shows that other countries are likely to become eligible for support through WHR under IDA20. Therefore, there is an essential need to work with governments in these countries to understand and maximise the use of WHR resources, as well as alter its arrangements if needed.</p>	<p>Thank you. The utilization of the Window for Host communities and Refugees is being continually assessed. IDA is working with countries neighboring Afghanistan to strengthen preparedness for potential refugee inflows.</p>
<p>UNICEF</p>	<p><i>Areas of Support</i></p> <ul style="list-style-type: none"> • UNICEF welcomes continued urgency and increased prioritization of FCV settings for IDA given the recognition that poverty is increasingly concentrated in FCV settings, and that violent conflict continues to be a key impediment to sustainable development, with additional pressures resulting from the COVID-19 pandemic. • UNICEF appreciates how the FCV Special Theme strongly captures the issue of climate change, one of the greatest long-term threats to children. UNICEF recent analysis (Child Climate Risk Index) shows that out of the 33 countries where children are most vulnerable to climate change, 29 are classified as fragile or extremely fragile (per OECD States of Fragility). Therefore, the intersection of climate, conflict and COVID-19 is critical for formulating investments in prevention and resilient development. <p><i>Suggestions</i></p> <ul style="list-style-type: none"> • UNICEF suggests explicitly addressing strengthening ‘horizontal social cohesion’ or including how leveraging social services delivery can also strengthen the relationships between and within groups. UNICEF experience shows the importance of the intersection of vertical and horizontal dimensions for strengthened overall social capital, as also well captured in the <i>Pathways for Peace</i> report. • Further, UNICEF would appreciate deepening the analysis and references to be more inclusive when discussing youth and children. UNICEF proposes using the phrase ‘young people’ – as this is inclusive of both adolescents and youth demographic categories (10-24) as defined by the United Nations. • While UNICEF appreciates explicit and deliberate focus on gender equality and inclusion and empowerment of women in the report, we recommend the emphasis on empowerment and inclusion of young people be as explicit as the focus on gender – 	<p>Thank you. FCV continues to be a priority area for IDA.</p> <p>Even though the WB/IDA may use a slightly different language, this is very important and is part of what we do. These issues are for example analyzed in our Risk and Resilience Assessments and then incorporated in Country Partnership Frameworks and programming as appropriate.</p> <p>The Deputies Report will include references to youth and children where suggested.</p> <p>The World Bank recently published “A Development Approach to Conflict-Induced Internal Displacement,” which outlines its overall principles and agenda for</p>

Organization	Comments	Response/Action
	<p>including strengthening the age dimensions of investments in human capital in FCV settings to transform their systems of exclusion around young people, while simultaneously investing in reducing intergenerational trust deficit, ensuring meaningful participation in decision making of young women and men, boys and girls.</p> <ul style="list-style-type: none"> • Regarding the FCV policy commitments related to leveraging outcomes for both host and refugee communities, suggest deepening the strategy for the situations of internal displacement. Focusing on internally displaced persons would link directly to the strategy of working on sub-national conflict/violence that is cited in other priorities. • UNICEF proposes including mental health and psychosocial support (MHPSS) under the Fragility, Conflict and Violence Special Theme and endorses the following line that the Dutch Government suggests adding to paragraph 114 (page 60): <i>“114. Participants supported IDA20 simultaneous focus on addressing drivers of FCV and COVID-19 crisis response and recovery priorities...”</i> [add:] <i>IDA support will also include attention to the burden of poor mental health and psychosocial needs on people, communities, and institutions in IDA FCS.</i> 	<p>strengthening the institution’s engagement on IDPs in alignment with the report and recommendations from the UN High Level Panel on Internal Displacement.</p> <p>The Deputies Report will include a reference on mental health under the Human Capital Special Theme.</p>

Special Theme: Gender and Development

Organization	Comments	Response/Action
<p>Youth Initiative for The Promotion of Good Leadership</p>	<p>Policy commitment under the Gender issue should be our target priority.</p> <p>Women empowerment and access to quality reproductive adolescent and primary Health care, creating employment opportunity for women in infrastructure and improving women land right. And maintaining commitment on wide approaches to prevent and respond to GBV in health and education system.</p> <p>Support to prevent sexual exploitation and abuse and sexual harassment and Support to reducing climate threat to health and sustainable development, human development and infrastructure and biodiversity</p>	<p>Thank you for your comments. These priority areas are covered by policy commitments under the Gender Special Theme and/or as part of broader IDA20 directions.</p>
<p>Global Coalition on Social Protection Floors Ad hoc Group on IDA20</p>	<p>Para 119 Adaptive social protection, based on the principle of targeting, as currently implemented by the WB, cannot help push forward a transformative change to gender inequalities. These programs are unfortunately too often too small, only temporary and conditioned to targeting criteria that creates unnecessary exclusions. Narrowly targeted ASP that is reliant on proxy-means testing and similar approaches, excludes many women who need, and have the right to, protection.</p> <p>In what the WB see as a “progressive” vision of universality, it attempts to create super-efficient adaptive systems in lieu of social protection floors. However, gender integrated social protection</p>	<p>Thank you for your comments. The Policy Commitments represent only a small part of what the World Bank is supporting in IDA countries. The Bank supports policies that counter discriminatory gender practices and barriers as part of its work (including through analytical work and development policy lending). While universal access to services is the long-term goal, the language in the Policy Commitments reflects the ambition for the 3-year cycle.</p>

Organization	Comments	Response/Action
	<p>floors would be effectively supporting gender equality by challenging gender norms; including through the recognition, redistribution and reduction of unpaid care work.</p> <p>Adaptive social protection programs, as currently implemented by the WB, disregard the administrative costs of these systems and the numerous pitfalls of narrow targeting methods. Like all systems based on poverty targeting, they can further divert time and resources away from the realization of the human right to social protection and gender equality.</p> <p>Para 120 We regret to see that the WB’s approach in IDA20, by endorsing the WB’s Gender Strategy, only considers gender equality through the lens of access to the labor market and economic empowerment, disregarding the need for a shift in unequal gender norms, transformative of gender inequalities. Indeed, the four pillars of the strategy fail to address the need, not only for a reduction and redistribution of unpaid care work hampering women’s equal access to employment and economic empowerment, but also for a recognition of care work as a crucial tool for human development.</p> <p>In that sense, universal social protection floors, can foster a shift in unequal gender norms by recognizing the value of unpaid care work, while reducing and redistributing it between men and women, and women and States (notably through universal health care).</p> <p>Para 123 The GCSPF welcomes the emphasis put on childcare services as a means to challenge the gender and economic inequalities through women’s access to the labor market. Childcare and social care services, as well as social protection floors, are indeed key tools to help recognize, reduce and redistribute care work, from poor households, and specifically poor women, to the State, and hence favor their participation to the labor force.</p> <p>However, we regret that the “Gender and development special theme” does not mention universality of these services. While the policy commitment related to child care mentions “quality” and “affordability” of the services, it also specifies that these will be intended for “low-income parents”. While low-income parents are obviously the ones most in need of these services, the ways in which the World Bank will determine which parents’ incomes are low enough to benefit from the service is artificial in countries where most of the population is poor (see above our comments regarding the targeting approach).</p> <p>In addition, the approach of the WB regarding childcare is solely based on the need for women to access the labor market. It disregards the ways in which childcare can help challenge gender norms by recognizing the value of, and the right to care in our societies. Children benefiting from care services have a right to quality and affordable services as a mean to foster their human development, while these same services can help reduce and redistribute unpaid care work. Additionally, care workers, a majority of whom are women, would benefit from better working conditions aligned with the recognition of the value of care services.</p>	<p>Please note that the ILO term ‘social protection floor’ is defined as “nationally defined sets of basic social security guarantees that should provide access to essential health care and to basic income security for all those in need over the life cycle.” For the World Bank, the term universal social protection means the same – social protection for all those in need. Universal Social Protection is at the core of the World Bank’s upcoming social protection strategy, recognizing that the progressive realization of Universal Social Protection (USP) is critical for effectively reducing poverty and boosting shared prosperity, and that countries across the globe are increasingly adopting this vision.</p> <p>Gender and social norms are indeed critical for transformation across many gaps and World Bank operations are being informed by research and evidence of what works to influence norms and achieve greater impact in narrowing gender gaps. This includes evidence from behavioral and social sciences.</p> <p>Under the new Gender Policy Commitment #3 on expanding childcare, IDA20 will encourage investments to expand access to quality, affordable childcare. The COVID-19 pandemic has laid bare the deep inadequacies in the current system of childcare provision, including the burden of unpaid care work, uneven access to childcare, poor quality, the need for public finance, poor terms of employment for the workforce, and the overall vulnerability of the sector.</p> <p>The World Bank’s new paper on childcare “Better Jobs and Brighter Futures: Investing in Childcare to Build Human Capital” lays out the Bank’s strategy on childcare which takes a holistic approach to childcare, considering the benefits for children, families, women, businesses and economies (it does not focus solely on women’s labor force participation); it includes content on the need to invest in the quality of childcare, to expand access for all families, the benefits for child development and need to support the childcare workforce. The emphasis on reaching low-income families is consistent with IDA’s overall approach to prioritize the most vulnerable families, but, in practice, country-level policy dialogue</p>

Organization	Comments	Response/Action
	<p>Specific comments on policy commitments:</p> <p><u>Policy commitments 2 and 3</u>: we regret to see that no substantive changes have been made to the previous version, however we welcome the increase of 3à to 35 IDA countries in PC2</p>	<p>and efforts will focus on a broad expansion of childcare. Evidence from multiple low-income countries suggests that childcare availability improves the employment of women with young children, and is a critical tool for human development, including creating opportunities for girls to continue their education in contexts of early childbearing. In addition, the childcare sector creates jobs directly and indirectly in other sectors that provide inputs to the childcare sector and through increased earnings. Quality childcare also improves early and later learning outcomes.</p>
<p>Leadership Collaborative to End Ultra-Poverty</p>	<p><i>Under ‘Gender and Development’ No. 2: Scaling productive economic inclusion: Incorporate specific productive economic inclusion components (e.g., producer cooperatives/associations, digital finance/savings and service delivery, entrepreneurship support, social care services, regulatory frameworks, and/or links to market support) for women, especially the poorest, in at least 35 IDA social protection/jobs, agriculture, urban, and/or community development projects.</i></p>	<p>Thank you for the proposed addition. It is important to note that economic inclusion programs seek to restore livelihoods and integrate individuals and households into basic economic activities and community development processes. These programs target the poorest by design. Therefore, explicit reference in the policy commitment text would be redundant.</p>
<p>Care International</p>	<p>The continuation of the special theme on gender and development is very welcome and urgently needed. COVID-19 has reversed progress on gender equality by a generation, adding another 36 years to closing the gender gap to a shocking 135.6 years. IDA20 has a unique opportunity to prevent this set-back, and shift the dial on gender equality, but only with ground-breaking ambition.</p> <p>It is because of structural inequalities, such as inequality in unpaid care, that women and girls are disproportionately impacted by crises and held back from fully realising their opportunities and rights. The Deputies Report accurately assesses this and IDA’s new focus on child-care is therefore hugely welcome. IDA20’s recognition of the shadow pandemic of GBV, and commitment to increase action on tackling GBV, is also crucial. But in both areas ambition falls below what is needed. The World Bank has shown great leadership in the response to COVID-19, and with IDA20 has a unique ability to set the bar higher for global action on green, resilient and inclusive recovery. CARE urges the World Bank to significantly step-up ambition in the gender and development theme, integrate a focus on gender equality across the whole IDA portfolio, and make it IDA’s flagship contribution to gender-equitable recovery from COVID-19.</p> <p>Specifically, IDA20 should:</p> <ol style="list-style-type: none"> 1. Match ambition with unprecedented need, by integrating a focus on gender equality across the entire IDA20 portfolio, and significantly raise ambition in the gender and development special theme. This includes conducting regular gender analyses to inform IDA’s policies and programming, implementing ex-ante economic impact 	<p>Thank you for your comments. The Policy Commitments represent only a small part of what the World Bank is supporting in IDA countries. Supporting policies that counter discriminatory gender practices and barriers is part of World Bank work (including through analytical work and development policy lending) overall, with a focus on gender equality across the whole IDA portfolio.</p> <p>Policy Commitment #3 is new, and the target of 15 IDA countries was reached after extensive review of the pipeline by relevant Global Practices considering only what can be achieved in the three-year IDA cycle. It is expected that this focus will support a larger pipeline for the future.</p> <p>Regarding the reference to targeting 80 million jobs, the new WBG paper “Brighter Jobs and Better Futures: Investing in Childcare to Build Human Capital” indeed highlights the potential for substantial job creation in the childcare sector and the need for the jobs to be decent. Highlighting one outcome related to childcare only (job creation, for example, as opposed to number of children enrolled in childcare or number of women able to enter</p>

Organization	Comments	Response/Action
	<p>assessments on gender equality, and gradually expanding collection and use of sex-age-disability disaggregated data, with a view of using this disaggregated data across the entire IDA20 portfolio.</p> <p>2. Increase ambition on building the care economy by expanding measures on childcare beyond the envisaged 15 IDA countries, and by expanding ambition to gradually contribute to building the care economy in line with the 5Rs (Recognition, Reduction, Redistribution, Representation and Reward for care work). As a first step towards this goal, IDA should include a commitment to create 80 million decent care jobs. The is one of the commitments given in the UN Action Coalitions Global Acceleration Plan at the Paris Generation Equality Forum, and has further been identified as a key priority towards building the care economy by women-led, youth and Civil Society organisations. We urge the World Bank to amend the gender and development policy commitment number 3 by increasing the number of IDA countries that are supported on childcare, and adding “and increasing investment in the care economy, with a view to create 80 million decent care jobs”.</p> <p>3. Given the scale of need across countries, IDA should increase the number of countries that receive support to strengthen implementation of GBV prevention, risk mitigation and response, far beyond the envisaged 10 IDA countries. Beyond supporting GBV response services, IDA should further direct more funding and support towards primary prevention interventions that address the underlying norms, attitudes, and behaviours that lead to GBV. IDA should consider increasing investments that scale up promising primary prevention approaches, such as CARE Rwanda’s Indashyikirwa, which have proven to be effective in reducing intimate partner violence by engaging community members and couples in dialogue and activism to reject violence against women and girls and to build skills for healthy, equal relationships.</p> <p>4. Strengthening and investing in women’s leadership and meaningful participation in decision making, from national to global levels. CARE welcomes IDA’s recognition of women as agents of change, including in crisis and towards a green transition. The World Bank should strengthen this priority by adding a standalone commitment to strengthening women’s leadership and prioritisation of gender equality. Priority should be placed on strengthening leadership from diverse groups of women, including those experiencing intersecting forms of discrimination. This includes: funding women-led and women’s rights organisations as agents of change, financially supporting gender-related institutions, as well as encouraging the development and implementation of gender equality national action plans and policies in IDA countries.</p>	<p>the workforce) risks undermining the message on the holistic benefits of childcare investments for children, families, women, businesses and economies.</p> <p>In addition to supporting 10 IDA countries to strengthen national policy frameworks for GBV prevention and response, we will support at least 15 IDA countries, including those in fragile and conflict situations, to strengthen GBV related services in health systems and implement GBV prevention and response protocols as part of safe and inclusive education institutions, which includes a focus on primary prevention of GBV through schools but often reaching out to the whole community as well. The World Bank is seeing more operations implementing activities to promote healthy relationships, women’s rights and/or equality between men and women through engaging men and boys and women and girls, in multiple prevention programs and it is an area the Bank looks to explore further. In addition, the World Bank helps mitigate the risk of SEA/SH in all World Bank financed IPFs, those financed by IDA and IBRD.</p> <p>Women’s leadership and meaningful participation in decision making is critical. IDA20 will build capacity of national and local governments to work in partnership with communities while building the leadership potential of women and youth, through supporting mechanisms such as community-driven development that promote local leadership and meaningful citizen and community participation in all levels of climate decision making (Para 100). The World Bank will continue to focus on this through the GRID agenda where women are recognized as agents of change.</p>
Oxfam International	<p>CARE WORK</p> <p>We are pleased to see policy commitments that recognize the link between gender equality and unpaid care work; and that seek to close gender gaps via gender responsive budgeting at the</p>	<p>Thank you for your suggestion. The policy commitment does not specify sectors as the intention is to work across</p>

Organization	Comments	Response/Action
	<p>national level. However, in order to address the challenges of unpaid care work more broadly, integrating an intentional view to reducing the time and intensity of labor spent on care work in care infrastructure (access to water, sanitation, energy and transport) and that go beyond investments in care-related service such as childcare will be important.</p> <ul style="list-style-type: none"> • Concretely, we propose the following addition (in red) to the childcare commitment under the Gender and Development Special Theme: <p><i>Expanding childcare:</i> Support at least 15 IDA countries to expand access to quality, affordable childcare, especially for low-income parents <i>and at least 15 IDA countries to integrate care work considerations into care infrastructure such as access to water, sanitation, energy and transport projects.</i></p>	<p>all sectors and take a whole-of-government approach to childcare investments, including care infrastructure within the various sectors highlighted in the comment (water, sanitation, energy, transport, etc.).</p>
Results Canada	<p><i>Under ‘Gender and Development’ No. 2: Scaling productive economic inclusion: Incorporate specific productive economic inclusion components (e.g., producer cooperatives/associations, digital finance/savings and service delivery, entrepreneurship support, social care services, regulatory frameworks, and/or links to market support) for women, especially the poorest, in at least 35 IDA social protection/jobs, agriculture, urban, and/or community development projects.</i></p>	<p>Please refer to response to Leadership Collaborative to End Ultra-Poverty above.</p>
Sightsavers	<p>Gender and Development</p> <p>As with previous replenishments, we are concerned that the Gender and Development Special Theme does not reflect the multiple and intersecting inequalities that some women experience, such as women with disabilities.</p> <p>The Special Theme would be strengthened if this was explicitly recognised. The recent data collected on disability through the ‘<i>Women, Business and the Law</i>’ report could be used to measure progress on disability and gender as part of this Special Theme.</p>	<p>Thank you for your comments. IDA20 will further scale up support to disability inclusion across Practice Groups and Special Themes. A new stand-alone policy commitment in the Human Capital Special Theme paper addresses the needs of persons with disabilities by implementing the principles of universal access through projects across multiple sectors beyond the physical aspects of accessibility.</p>
UNICEF	<p><i>Suggestions</i></p> <ul style="list-style-type: none"> • UNICEF suggests including references to the need for sex and age disaggregated data as well as recognizing the need for both women and girls’ empowerment. • To strengthen paragraph 118, the report may also note that several services for women and girls were suspended during the pandemic which impacted their overall health, such as maternal health and sexual/reproductive health care services. Further, the pandemic reversed gains made toward protecting girls and adolescent girls from harmful practices such as child marriage and female genital mutilation. 	<p>It is important to further improve gender data, including by improving frequency, quality, and sex-disaggregation. The World Bank supports strengthening data capacity of IDA countries to fill remaining gaps and remains committed to sex-disaggregating all Tier 2 indicators, where possible.</p> <p>Para 122 seeks to showcase how operations in different sectors (e.g., health, education, transport, etc.) have invested in GBV prevention and response activities. The Zambia operation provided as an example focuses on training community volunteers and health workers, but</p>

Organization	Comments	Response/Action
	<ul style="list-style-type: none"> <li data-bbox="384 134 1335 224">• To strengthen paragraph 120, UNICEF suggests reference the importance of agency for adolescent girls and the need to invest in skills for adolescent girls early on to shift from learning to earning and enable women to access meaningful work. <li data-bbox="384 256 1335 345">• In paragraph 122, suggest including support for the clinical management of rape and psychosocial support for survivors of GBV, as well as strengthening GBV training for community volunteers to through improved data collection. <li data-bbox="384 378 1335 565">• Further emphasis on family friendly policies that extend beyond child care would enable gender equality, including the promotion of incorporating these policies within government and the private sector (see Brief on family friendly policy for workers in informal economy Family-Friendly Policies for Workers in the Informal Economy and the ICC-UNICEF Joint call UNICEF ICC Joint Call to Action) <li data-bbox="384 597 1335 776">• To recognize the security threats LGBTI people face in some countries, UNICEF suggests expanding on the report’s mention of the “struggle for recognition and equality” to include the threats to execution (in 11 countries) and imprisonment (71 countries) LGBTI face. Given these risks, UNICEF recommends IDA consider including a commitment with regards to protecting the security of LGBTI individuals in addition to efforts to learn and study the issue. 	<p data-bbox="1356 134 1978 345">there are other health operations that support the clinical management of rape and psychosocial support for survivors of GBV, and the Bank will continue to provide such support under IDA20. The World Bank supports government efforts to implement WHO recommendations on responding to adult and child survivors of sexual violence.</p>

Special Theme: Jobs and Economic Transformation

Organization	Comments	Response/Action
Bread for the World	<p data-bbox="317 940 569 964">Smallholder Farmers</p> <p data-bbox="317 972 1335 1305">Similarly, Bread welcomes the focus on micro, small, and medium enterprises (MSMEs), including within the Private Sector Window. MSMEs are crucial stakeholders in efforts to strengthen nutritious, productive, and equitable food systems in IDA countries. However, it is not clear in the draft report whether smallholder farmers are included in this group. Smallholder farmers, 43 percent of whom are women, produce one-third of the world’s food and up to 80 percent of the food supply in Asia and sub-Saharan Africa. IDA20 should include specific policy commitments, especially under the Climate Change and Jobs and Economic Transformation themes, to support smallholder farmers in building resilience to climate shocks and in facilitating market access. This policy commitment should be accompanied by a Tier 2 Indicator on the number of smallholder farmers and/or MSMEs provided with agricultural services.</p>	<p data-bbox="1356 972 1978 1208">The Jobs and Economic Transformation (JET) Policy Commitment #5 refers to improving agricultural productivity and strengthening agri-business value chains in ‘ways that are inclusive’. This is intended to address constraints for key groups that might otherwise be at risk of exclusion, for which small holder farmers would be a relevant group and so the project can address constraints they may face.</p> <p data-bbox="1356 1240 1978 1419">The JET Policy Commitment #5 language has also been previously revised to include “including through the promotion of climate smart agriculture” to make explicit the complementarity with the commitments under the Climate Change special theme and to ensure this work is supporting resiliency.</p>

Organization	Comments	Response/Action
		<p>The existing Tier 2 Indicator (“farmers adopting improved agricultural technologies”) should suffice and an additional Tier 2 indicator may not be needed as it may significantly overlap with the existing one. There is also a sense that this policy commitment is getting quite long - the essence is still to “Improve agricultural productivity, agri-business value chains and food security”. Adopting improved agricultural technologies by farmers would be one of key drivers to improve agricultural productivity, agribusiness value chains (for instance by making famers reliable suppliers for the value chains) and food security (for instance by producing more and better foods and generating more income).</p>
<p>Youth Initiative for The Promotion of Good Leadership</p>	<p>Commit to sustainable business growth and job creation on agricultural sector which remain the key drive sector with effort to expand modernization in agricultural value chain.</p>	<p>The JET PC5 language has been previously revised to include “including through the promotion of climate smart agriculture” to make explicit the complementarity with the commitments under the Climate Change special theme and to ensure this work is supporting resiliency and sustainability.</p>
<p>SDG2 Advocacy Hub</p>	<p>Pg. 70</p> <p><i>Boosting agriculture productivity, value chains and food security: Improve agricultural productivity of smallholder farmers or small-scale food producers, including through the promotion of climate-smart agriculture, and strengthen sustainable agri-business value chains, including SMEs, with high potential for growth and better jobs addressing modernization and food and nutrition security in 15 IDA countries, including five FCS, in ways that are inclusive, expanding training for agricultural workers to access better jobs, and encouraging private sector opportunities.</i></p> <p><i>Boosting institutional capacity to improve data for policy decision-making: Support 34 IDA countries including those with ongoing statistical operations (i) to strengthen institutions and build capacity to reduce gaps in the availability of core data for evidence-based policy making, including disaggregation by sex, geography (urban-rural), age, ethnicity, disability and other socio-economic variable where appropriate; and (ii) to increase resilience of statistical systems, including through investments in digital technology and high-frequency monitoring capabilities.</i></p>	<p>The JET PC5 refers to ‘inclusive’ to capture the need to identify and address specific constraints and opportunities facing key groups at risk of not benefitting fully from IDA engagements. Smallholder farmers and SMEs – as well as women – will be included in this way.</p> <p>We recommend that the JET PC8 remain as currently articulated. Sex and disability are included to link them to their inclusion as special themes in IDA. It is also noted that some socio-economic variables can be sensitive (e.g., ethnicity can be considered politically charged in some countries and would not be recommended to be asked). Variables such as age, geography and others are often included in household surveys and population censuses, with the strata varying a bit based on country contexts, but the intention of the policy commitment is to focus on the priority special themes for IDA20.</p>
<p>Care International</p>	<p>CARE welcomes IDA’s explicit focus on creating jobs and fostering economic transformation, particularly in light of COVID-19’s impact on the formal and informal economy. To ensure</p>	<p>IDA20 is committed to expanding ‘better jobs’ which is aligned with the ILO’s decent work framework. The aim is to have more productive and higher paying jobs, but also</p>

Organization	Comments	Response/Action
	<p>IDA's jobs agenda is equitable and inclusive, the Bank should place explicit focus on gender equality and integrate a focus on decent work across the JET special theme.</p> <p>Within measures to strengthen financial inclusion, entrepreneurship opportunities and women's economic empowerment, deliberate emphasis should be placed on designing evidence-driven and needs-based programmes and products to meet the needs of diverse women and marginalised groups. Further, against the backdrop of the worsening climate crisis, IDA should explicitly foster job creation opportunities presented by the transition to a green global economy and the changing world of work. Emphasis should be placed on inclusion and strengthening gender equalities, rather than high-growth sectors, even if often both criteria overlap.</p> <p>Specifically, IDA20 should:</p> <ol style="list-style-type: none"> 1. Expand its focus on decent work across the JET theme. For instance, the focus on strengthening 'sustainable agri-business value chains with high potential for growth and better jobs addressing modernization and food and nutrition security' is welcomed but any such jobs must be decent jobs in line with the ILO's decent work framework. We also recommend measures to ensure that barriers to women's participation in these new jobs are removed, to ensure existing inequalities are not exacerbated and gender wage and labour market participation gaps are not further entrenched or worsened. 2. IDA should integrate a focus on gender equality throughout its job interventions. The focus on removing barriers in sectors where women and youth disproportionately work is welcome. In CARE's experience many of these sectors where women and youth work have also been disproportionately affected by job losses and disruption during the COVID crisis, during which women have been 1.8 times more likely than men to lose their jobs. These are also the sectors most at risk of job losses and displacement driven by automation and informalisation as well as the transition to a green economy. Targeted interventions are needed to address these risks to women's jobs, and to generate decent work opportunities for women and enable equitable workforce participation. 3. It is welcome to see focus placed on 'cybersecurity and related issues'. CARE recommends that explicit reference is made to addressing online abuse, including gender-based violence and harassment. Ratification and implementation of the ILO's Violence and Harassment Convention C190 could help reduce the risk by preventing, protecting and responding effectively to incidents of abuse, which disproportionately affect women and minorities. 4. References to interventions being informed by data is very welcome. IDA should go further by using sex-age-disability disaggregated data across the JET theme, and specifically design programmes and interventions on financial inclusion and entrepreneurship by using sex-age-disability disaggregated data and systematically 	<p>jobs that provide safe working conditions, provide for the voice of workers, are inclusive of marginalized groups. As many of the intended beneficiaries of these projects will be the poor in IDA countries, i.e., small holder farmers or workers in the informal sector, some elements of the ILO framework that are better suited for formal wage employment may be only possible in the longer term.</p> <p>The commitment to gender equality and addressing that women have been disproportionately hit by the COVID-19 crisis is why JET PC4 distinguishes the criteria for both sectors with high potential and those where women and youth disproportionately work. The two may indeed overlap; the intention here is to allow for both criteria independently such that sectors where women work could be a focus, even if they are not as high potential for growth.</p> <p>We acknowledge the importance of addressing online abuse, including GBV. The Deputies Report recognizes the importance of addressing gender-based abuse and violence, and will include language on the role of digital platforms in expanding potential channels for such abuse and harassment.</p> <p>Many policy commitments refer to 'inclusion' to allow for relevant groups to be identified based on the policy commitment and projects. Gender and disability are already highlighted under IDA20 and JET PC4 already is explicit about paying attention to job opportunities for young people.</p>

Organization	Comments	Response/Action
	involving women from diverse backgrounds in the design, implementation and evaluation of policies, programmes, funding. This includes supporting the design of demand driven digital technologies and products on financial inclusion.	

Results Measurement System

Organization	Comments	Response/Action
Bread for the World	<p>Bread for the World welcomes the continued inclusion of Tier 1 indicators:</p> <ol style="list-style-type: none"> 3. Countries with growth concentrated in the bottom 40 percent 4. Gini index 21. Prevalence of stunting among children younger than 5 39. Prevalence of undernourishment <p>as well as Tier 2 indicators:</p> <ol style="list-style-type: none"> 7. Farmers adopting improved agricultural technology 8. Areas provided with new/improved irrigation or drainage services 14. Beneficiaries of social safety net programs 15. People who have received essential health, nutrition, and population services 17. Women and children who have received basic nutrition services 28. Countries integrating adaptive social protection into national systems with IDA support <p>It is imperative to track each of these indicators so as to monitor progress on the inclusion of disadvantaged and vulnerable groups, access to nutrition services, and the success of agriculture and food security investments.</p> <p>The continued inclusion of the Tier 1 indicator on stunting is very important. About a quarter of all children worldwide, and more than half of all children in the lowest-resource contexts, are affected by stunting. Stunting carries devastating lifelong consequences for individuals and can suppress the economic growth of entire nations. However, a Tier 1 indicator on prevalence of acute malnutrition among children younger than 5 should be added as an additional data point. In addition to being consistent with both the Sustainable Development Goals and the World Health Assembly global nutrition targets, an indicator on acute malnutrition would provide a fuller picture of IDA countries' progress on nutrition and food security.</p>	<p>Thank you for your support for many of the indicators in the proposed RMS, and your additional suggestions. We fully agree that there are many dimensions of hunger and nutrition that all deserve attention. But we are limited in the number of indicators that we can include in the RMS and recognize that it does not fully capture the impact of a development institution as complex as IDA. The RMS is a summary of sentinel indicators that capture essential elements for achieving the ultimate desired change.</p> <p>Prevalence of malnutrition and other relevant indicators remain publicly available and up to date through the World Development Indicators. At the country level, IDA country programs commonly target reductions in malnutrition as a key high-level outcome to which they contribute. IDA will continue to help countries tackle this challenge through these customized programs, and track progress using all the relevant indicators for each particular setting.</p>
Global Coalition on Social Protection Floors Ad hoc Group on IDA20	<p><i>A. Human capital special theme</i></p> <p><u>RMS</u>: we regret to see that the RMS does not mention universals social protection floors, contrary to the GCSPF's recommendations.</p> <p><i>B. Gender and development special theme</i></p>	<p>Thank you for your feedback and your advocacy on this important topic. The RMS is a summary of sentinel indicators that capture essential elements for achieving the ultimate desired change. These indicators are not necessarily outcome indicators, but progress in these indicators entails a higher likelihood of achieving the desired high-level outcomes, based on available evidence. Given limits in the number of indicators it can contain, the</p>

Organization	Comments	Response/Action
	<p><u>RMS</u>: we regret to see that the RMS does not mention childcare services, contrary to the GCSPF's recommendations.</p>	<p>RMS, by itself, cannot capture the full breadth and depth of IDA's contributions to our client countries.</p> <p>Individual customized IDA country programs will continue to tackle the challenge of developing social protection programs, reflecting ILO principles, and providing childcare services in cooperation with IDA country clients.</p>
Global Poverty Solutions	<p>Beyond the well-meaning policy commitments, the Results Measurement System (RMS) offers a panorama of what specifically can be achieved by entrusting donor funds to IDA. In the area of human capital, a key area considering it is one of the five special themes of IDA, there are seven indicators. The recently published targets of the WB seem to indicate that for five of them, a large majority, we will be getting less than we would expect, for the money.</p> <p>a) The first observation is one that is simply inexplicable: the access to water target is ½ lower than what was actually achieved in IDA18, whereas IDA 20 has nearly 25% more funding at its disposal.</p> <p><i>The access to water minimum target should be what was achieved under IDA 18 + 25%, i.e. 40 million people.</i></p> <p>b) The second problematic target is that of the number of large scale learning assessments. The World Bank is committing to 25-35 large scale educational outcome assessments, down from 30-40 in IDA 19. If one prorates the actual and planned assessments for the first two years of IDA 19, one gets a range of 30-45 over three years. Improving learning outcomes is key to ending extreme poverty, because parents are less likely to send children, especially girls, to school when they are not convinced that attending school leads to tangible benefits. This drop in the target is inexplicable because learning outcomes are now a policy priority in IDA 20, and should drive the target upward.</p> <p><i>The range of large scale learning assessments should be 30-45.</i></p> <p>c) The third scaled down target relates to access to sanitation: the target proposed by the World Bank is 1/3 less than what was achieved under IDA 18. Why do less with more money? In order to reach the targets of the Africa Human Capital Plan alone, 51 million more people need to find an alternative to open defecation. Moving linearly on the sanitation scale, 51 million more people should have access to improved sanitation during IDA 20.</p> <p>d) The fourth area where IDA 20 will be under-delivering, unless there is an amendment to the target, is nutrition services. IDA 18 managed to offer nutrition services to 132</p>	<p>Thank you for your feedback and your careful analysis of RMS Tier 2 expected ranges over recent IDA cycles. Improving human capital in IDA countries is central to the work of IDA20, and is a point of emphasis in the IDA policy and results package.</p> <p>The RMS is a summary of sentinel indicators that capture essential elements for achieving the ultimate desired change. These indicators are not necessarily outcome indicators, but progress in these indicators entails a higher likelihood of achieving the desired high-level outcomes, based on available evidence.</p> <p>Because IDA's business model is built on the well-evidenced belief that the most effective way to achieve development outcomes is through a country-led development program, IDA's portfolio is demand-driven and country-owned. We work hand-in-hand with client countries to identify a pathway to high-level outcomes, analyze constraints and opportunities to accelerate along that path, strengthen institutions to amplify impact beyond direct investments, and make pivotal or demonstration investments to crowd in public and private resources. This process can take years and decades, and is customized to the needs of a client and a particular moment in time. Indeed, more and more IDA support is focused on the indirect pathways to high-level outcomes—primarily through strengthening institutions—which is difficult to capture in Tier 2 indicators because IDA is one of many partners contributing to a client's outcomes.</p> <p>The unique outcomes to which IDA contributes cannot simply be added up across countries. As such, the RMS can only track those things that are quantifiable,</p>

Organization	Comments	Response/Action
	<p>million people. With a budget nearly 25% higher, IDA 20 should be reaching close to 170 million people. Yet, the current target is set at 140-150 million people receiving nutrition services. This is despite the fact that there is a food security crisis and more importantly, the fact that to “<u>expand</u> access to quality early years services, including maternal and nutrition services in at least 30 countries” is a new policy priority under IDA 20. How can nutrition expansion become a policy priority of a \$90 billion program without additional people being reached? We are calling for nutrition targets at least 50% higher than what is being proposed. This will allow IDA to partially prevent child stunting and address wasting in 30 countries.</p> <p><i>The access to nutrition target should be set at 210-225 Million.</i></p> <p>e) Finally, the social safety net coverage target is equally unambitious. Under IDA 18, 59 million people gained access to a social safety net. Pro-rated to factor in the additional funding expected for IDA 20, 75 million should gain access to a social safety net. Under the current, the target is set at 75 million, but includes temporary coverage related to the pandemic, which makes the target meaningful.</p> <p><i>The social safety net coverage target should be set at 75 million, excluding temporary coverage related to the pandemic.</i></p> <p>There are other incongruities related to targets, in respect of IDA 19 this time, which are explained in the Annex to this document.</p> <p>Conclusion For the general public – and the taxpayer -- , having human capital as a special theme means that they can count on more initiatives being implemented in this area. The RMS tells us this will not be the case.</p> <p>Yet the RMS does not monitor difficult-to-achieve transformative societal change; it just tracks whether actions are at least being taken as a first step on the path to change.</p> <p>For instance, the RMS is not about eliminating poverty, just making sure a small portion of the population, the most vulnerable, is covered by a safety net.</p> <p>It is not about making all children know how to read, write and count perfectly, but about conducting the assessments that will let us know what populations are having the hardest time acquiring these foundational skills.</p> <p>It is not eliminating malnutrition, but it is at least about making sure more children have access to nutrition services.</p>	<p>aggregatable, and common across the portfolio. These tend to be lower-level outcomes, sometimes the first step on the pathway to change. An adapted approach to country engagement, being rolled out this fiscal year, should better equip IDA to report its contribution to high-level outcomes over time.</p> <p>RMS expected ranges in Tier 2 are constructed from the bottom up, an aggregation of expected results in active and pipeline operations. The sum of these targets fluctuates naturally over time as demand rises and falls on certain topics, and the portfolio is more or less mature during a particular window of tracking. It is important to consider a longer trend in expected ranges, and reflect on IDA’s broader impact on high-level outcomes, including through strengthening institutions, beyond what can be aggregated across countries.</p>

Organization	Comments	Response/Action
	<p>There is no reason, with increased funding, for the IDA 20 RMS to be so unambitious. All stakeholders need to be reassured that the Bank will not be scaling down its basic interventions.</p>	
Results Canada	<p>The quantitative targets for IDA 20 have been released less than 2 weeks ago, but they appear to be the most problematic aspect of the current Deputies' Draft. Put bluntly, they seem to indicate that despite an increase in funding, IDA will be delivering scaled-down results, at least in the area of human capital. <u>This problem is pervasive as it affects 6 human capital indicators out of 9</u>, and undermines what should be the pre-eminence of human capital as a special theme of IDA 20:</p> <ul style="list-style-type: none"> - The Access to Sanitation target and the Access to Water target in IDA 20 are not only lower than what was planned for IDA 19, they are 1/3 to 1/2 lower than what was actually achieved in IDA18. This is difficult to comprehend, considering that access to sanitation is a quantitative priority in the Africa Human Capital Plan, and that the pandemic has shown us the importance of hygiene and of stopping pathogen contamination! - The World Bank is committing to assisting 8 countries among the ones with the lowest human capital scores develop human capital funding plans, down from a target of 10 in earlier drafts. Why this reduction of ambition? We realize that many countries with low human capital indices will hopefully have plans by the end of IDA 19, but why not try to reach nearly all of these countries? Low human capital is in large measure what keeps extremely poor households in a cycle of destitution. - In the current draft, the World Bank is committing to 25-35 large scale educational outcome assessments, down from 30-40 in IDA 19. This drop is difficult to understand because learning outcomes are now a policy priority in IDA 20. Improving learning outcomes is key to ending extreme poverty, because parents are less likely to send children to school when learning outcomes are mediocre, which then perpetuates the cycle of economic exclusion, especially for girls. If you prorated the actual assessments achieved during the first two years of IDA 19, you would get a range of 30-45 over three years. The number of large scale assessments should be <u>increasing</u> as the initial countries re-test their children to determine whether there is progress, especially in light of biggest disruption of education in history. - The Nutrition target is nearly the same as under IDA 19, despite an increase in the IDA budget, demographic growth, a food security crisis and more importantly, the fact that to “<u>expand</u> access to quality early years services, including maternal and nutrition services” is a policy priority under IDA 20. How can nutrition expansion become a policy priority of a \$90 billion program without additional people being reached? We are calling for nutrition targets at least 50% higher than what is being proposed. - The current draft RMS will track safety net coverage, disaggregating temporary coverage due to COVID-19 from the total, but its minimal target of 75 million will not disaggregate the 	<p>Thank you for your feedback and your careful analysis of RMS Tier 2 expected ranges over recent IDA cycles. Improving human capital in IDA countries is central to the work of IDA20, and is a point of emphasis in the IDA policy and results package.</p> <p>The RMS is a summary of sentinel indicators that capture essential elements for achieving the ultimate desired change. These indicators are not necessarily outcome indicators, but progress in these indicators entails a higher likelihood of achieving the desired high-level outcomes, based on available evidence.</p> <p>Because IDA's business model is built on the well-evidenced belief that the most effective way to achieve development outcomes is through a country-led development program, IDA's portfolio is demand-driven and country-owned. We work hand-in-hand with client countries to identify a pathway to high-level outcomes, analyze constraints and opportunities to accelerate along that path, strengthen institutions to amplify impact beyond direct investments, and make pivotal or demonstration investments to crowd in public and private resources. This process can take years and decades, and is customized to the needs of a client and a particular moment in time. Indeed, more and more IDA support is focused on the indirect pathways to high-level outcomes—primarily through strengthening institutions—which is difficult to capture in Tier 2 indicators because IDA is one of many partners contributing to a client's outcomes.</p> <p>The unique outcomes to which IDA contributes cannot simply be added up across countries. As such, the RMS can only track those things that are quantifiable, aggregatable, and common across the portfolio. These tend to be lower-level outcomes, sometimes the first step on the pathway to change. An adapted approach to country engagement, being rolled out this fiscal year, should better</p>

Organization	Comments	Response/Action
	<p>coverage due to temporary benefits so we are likely to end up with fewer than the 59 million non-temporary benefits achieved in IDA 18, which is unacceptable, especially with a new policy priority focusing on “building adaptive social protection systems.” <u>The target should cover non-temporary safety nets exclusively.</u></p> <p><i>We are requesting that at a minimum, that no human capital target be lower than either what was achieved in IDA 18 or lower than what is projected to be achieved in IDA 19 (pro-rated over three years). Further, human capital targets which support IDA 20 policy commitments (addressing learning poverty, early year nutrition, social protection) should see an increase, in comparison to previous years, otherwise the policy commitment is purely rhetorical. This covers directly the last 3 targets mentioned above (large scale learning assessments, access to basic nutrition services and social safety net coverage).</i></p> <p>Wasting as an additional Tier 1 indicator</p> <p>We welcome the presence of the “Prevalence of Undernourishment” as a Tier 1 indicator under Crisis Preparedness. <i>We would recommend the addition of the prevalence of wasting as complementary indicator of vulnerability for IDA countries, and of their risk of incurring a crisis-level social disruption, that will allow countries to know when upstream resilience-building are necessary.</i></p>	<p>equip IDA to report its contribution to high-level outcomes over time.</p> <p>RMS expected ranges in Tier 2 are constructed from the bottom up, an aggregation of expected results in active and pipeline operations. The sum of these targets fluctuates naturally over time as demand rises and falls on certain topics, and the portfolio is more or less mature during a particular window of tracking. It is important to consider a longer trend in expected ranges, and reflect on IDA’s broader impact on high-level outcomes, including through strengthening institutions, beyond what can be aggregated across countries.</p>
Sightsavers	<p>We strongly welcome the retention of the indicator on Universal Access and on the inclusion of an indicator on the collection of disability data. As previously highlighted, this will be critical in ensuring that the World Bank is contributing to a crucial area of disability inclusion and improve the availability of data for future IDA rounds.</p> <p>The Deputies report recognises the importance of disaggregation for the GRID agenda and has increased the amount of disaggregation as a result. However, we are concerned that despite this there is no disaggregation by disability of indicators in the RMS. IDA20 should take steps to disaggregate indicators by disability, particularly in Tier 2 where this could be built into programme design to ensure that data is available. There are also Tier 1 indicators where disaggregated data is increasingly available, and these should be disaggregated in IDA20.</p> <p>IDA20 should also strengthen the tracking and measurement of disability across World Bank supported programmes and funding. IDA20 could introduce a disability flag or marker, as already exists for gender. This is increasingly good practice amongst donors and would complement the indicator on Universal Access. The introduction of the OECD DAC disability marker has meant that OECD DAC donors are increasingly measuring the extent to which their funding is inclusive, and multilaterals such as UN Women and the ILO are also introducing their own markers which work within their internal systems.</p>	<p>Thank you for your comments and constructive suggestions. We fully agree that disability inclusion is a crucial area; IDA is working closely with client countries on the topic including by building capacity to disaggregate data by disability status, using the Washington Group question sets in data collection. But because few IDA countries currently have the capacity to track disability status, the RMS cannot report this in an aggregate way.</p> <p>IDA is exploring options to track its support for accessible services, and a separate flag or tag could be one option.</p>

IDA20 FINANCING FRAMEWORK

Concessional IDA Financing

Organization	Comments	Response/Action
Bread for the World	<p>Crisis Response Window Bread for the World welcomes the increased allocation to the Crisis Response Window (CRW) as well as the doubling of Early Response Financing (ERF) to \$1 billion. The latter can be used to respond earlier to slower-onset crises such as food insecurity. With increasing global hunger rates due to conflict, climate change, economic downturns, and the impacts of COVID-19, the CRW will be critical to preventing large-scale food crises, perhaps including famine.</p> <p>However, acute malnutrition—also known as wasting—is missing from the eligibility criteria. Wasting is a life-threatening condition. At any given time, 45 million children suffer from acute malnutrition, including nearly 14 million with severe cases. Children with acute malnutrition are nine times as likely to die as well-nourished children in the same communities. Acute malnutrition is a hunger crisis. The thresholds set for the use of CRW ERF resources should be revised to account for the severity of acute malnutrition levels.</p>	<p>Thank you. Although not addressed in isolation, malnutrition is a key element of the Famine Early Warning Systems Network (FEWS NET) Integrated Phase Classification (IPC) food insecurity classifications used as the basis for CRW ERF <i>trigger-based</i> activation. FEWS NET IPC classification is based on a convergence of available data and evidence, including indicators related to food consumption, livelihoods, malnutrition and mortality. As such, CRW ERF eligibility criteria do account for malnutrition where it contributes to high and increasing food insecurity. Meanwhile, food insecurity conditions that are more chronic in nature would be more appropriately addressed through core IDA programming.</p> <p>Where a country is not covered by FEWSNET or does not meet the ERF trigger thresholds, the CRW ERF <i>local activation</i> process provides a further opportunity to account for acute malnutrition or other contributors to food insecurity.</p>
ODI – A Global Affairs Think Tank	<ul style="list-style-type: none"> <i>We welcome the IDA20 replenishment being brought forward by a year: it recognises the sheer scale and breadth of the challenges IDA countries are facing as a result of the Covid-19 crisis. Contributing IDA members stepped up their efforts to avoid IDA grants and credits to avoid a fall of grants and credits in 2022 when they would have been most needed to support the recovery from the Covid-19 crisis in lower-income countries. We argued for an earlier replenishment in January 2021.</i>¹⁶ <i>Donor contributions should be as ambitious as their own fiscal stimulus packages. IDA is not the only multilateral development finance institution but it is the largest one for lower-income countries and it will play a key role in financing their social development and economic recovery. While IDA more than doubled its operations in 2020 compared to 2019, IDA is part of a multilateral response to the Covid-19 crisis that has overall been underwhelming and timid when juxtaposed with the fiscal responses of G20 countries and an ambitious “build back better” in global development agendas.</i>¹⁷ All in all bilateral donors spent only \$8.4 billion more in 2020. On the multilateral front, the IMF increased its net lending by \$44 billion, similar to the rise in operations of all the global and regional MDBs 	<p>We would like to thank ODI for its very useful inputs to the IDA20 replenishment process, as well as the fruitful collaboration on other key analytical programs, such as the recent seminar on the global aid architecture.</p> <p>We agree. As noted in Section 1 of the Report, overall financing needs for IDA countries are currently estimated at around \$739 billion over the IDA20 period. We hope that this replenishment will help partially fill this gap.</p>

¹⁶ [How IDA can support recovery from the Covid-19 crisis | ODI: Think change.](#)

¹⁷ [Multilateral finance in the face of global crisis | ODI: Think change](#)

Organization	Comments	Response/Action
	<p>combined. But just less than \$100 billion in international public finance in 2020 to tackle the immediate consequences in low and middle-income countries is a drop in the ocean compared to the unprecedented \$13.7 trillion fiscal packages in G20 countries.¹⁸ The preliminary version of the IDA deputies report recognises the unprecedented financing needs measured and expressed by IDA countries, at about \$739 billion over the replenishment period.</p> <ul style="list-style-type: none"> <li data-bbox="321 349 1335 527">• <i>IDA resources should increasingly be spent via development policy loans and deployed flexibly.</i> Using Development Policy Financing (DPFs) (or instruments akin to budget support) means funding is channelled directly through governments. Financing through national budgets is estimated to have a greater local economic impact, and would therefore likely have higher short-term fiscal multipliers.¹⁹ The share of IDA projects approved as DPFs fell again in 2021 though.²⁰ <li data-bbox="321 1084 1335 1294">• <i>The crisis is not yet over and greater support should be allocated to the Crisis Response Window (CRW).</i> The focus of the IDA20 replenishment is already on long-term development and economic recovery. The slow pace of vaccine distribution and uptake in lower-income countries and the waves of Covid-19 infections across Europe and North America still signal how much the global economy and lower-income countries are still too in the midst of the Covid-19 crisis. IDA also plays a role helping countries affected by a crisis return to their pre- shock levels of economic activity. We would therefore encourage 	<p>Although the share of IDA resources that were committed through DPFs fell moderately in FY21 compared to other instruments (IPFs and PforRs), the share and amounts remain well above the historical average. It is also important to note that the significant increase of IDA commitments in FY20 and FY21 is related to the World Bank response to the COVID-19 emergency, where IPFs played a key role to support the immediate health response, including vaccine acquisition and deployment. In effect, from April 2020 to June 2021, the WBG has committed over \$50 billion of IDA resources on grant and highly concessional terms through all its instruments. It is also worth noting that, after controlling for differences in GDP, IDA countries received substantially more in COVID-19-related DPF operations as did their IBRD counterparts. In effect, during the COVID-19 pandemic, the emergency-related DPF commitment to IDA countries was 3.3 times the IBRD average after controlling for economic size. This said, it is important to highlight that, with the exception of countries where financing goes through Third Party Implementers, all of the Bank financing (DPFs, IPFs, PforRs) goes through the national budget.</p> <p>The bulk of IDA’s COVID-19 response has been through Performance-based Allocations (PBA). This is consistent with the general design of the CRW as a ‘last resort’ buffer for crises. Under IDA19, the generalized COVID-19 crisis led shareholders to provide an extraordinary level of frontloaded resources through PBA, of which almost half</p>

¹⁸ [Multilateral finance in the face of global crisis | ODI: Think change](#)

¹⁹ [How IDA can support recovery from the Covid-19 crisis | ODI: Think change](#)

²⁰ [How the allocation of IDA20 should shift to ease the recovery from the Covid-19 crisis in lower-income countries | ODI: Think change](#)

Organization	Comments	Response/Action
	<p>IDA deputies to expand the volume of the CRW significantly. Criteria for eligibility and allocation should also better reflect the economic, social and health impact of future crises. This would include expected impact on GDP per capita, worsening of trade balances, foregone public revenues as a result of the crisis and reflect the source of economic growth affected by the crisis and the impact on jobs, for example.²¹</p> <ul style="list-style-type: none"> • <i>Greater volumes should be allocated to countries at moderate risk of debt distress as a result of the shift away from grants (the entire allocation as credits at 50-year maturity). We argued for a greater share of loans for countries at moderate risk of debt distress to increase the country allocation significantly.</i> ²² However, the allocation formula has not been amended to reflect this. Countries at moderate risk of debt distress will increase their country allocation as much as other categories but now entirely in the form of loans. Hardening of terms and conditions in countries at moderate risk of debt distress should be associated with greater volumes with a correction in the formula to reflect it. From the IDA deputies report, it is not clear whether the lengthening of the maturity and the grace period will mean the same overall grant element/level of concessionality for countries at moderate risk of debt distress. An entire country allocation in the form of loans might also mean fewer incentives to borrow for certain projects, especially in the social sectors.²³ 	<p>had been dedicated to the COVID-19 response. This is higher than what the CRW could have provided on its own</p> <p>As is the case for all other windows, Management will continue to closely monitor resource utilization and stand ready to redirect resources at the MTR to areas with high demand, so as to effectively use IDA resources. In IDA20, the size of the CRW will reflect the need to support countries which are hit by shocks, including food crises, while ensuring a progressive transition from COVID-19 crisis response. On CRW eligibility criteria, current criteria do consider various aspects of economic, social and health impacts. While we appreciate the more detailed suggestions, we also try to strike a balance between the volume of information required to assess eligibility versus facilitating quick processing of CRW cases.</p> <p>The IDA Balance Sheet Optimization measures provide countries with additional financing for the level of donor contribution provided than what would have been available in a “normal” replenishment period. The grant element of the financing terms that IDA-only Yellow-light countries will face would be kept largely unchanged with only marginal reduction (from 77 percent to 73 percent). However, the BSO measures will allow for IDA-only Yellow countries (at moderate risk of debt distress) to see an increase of about 6-11 percent in their county allocation at mid-high and high scenario, compared to the original IDA19 in nominal term (but small decrease in real per capita terms as discussed in the Official Financial Flows paper), and thus compensating for the small reduction in concessionality. Furthermore, such countries will also be eligible to access additional unearmarked concessional financing in the form of Scale Up Window –Shorter Maturity Loans (SUW-SMLs). As highlighted in the report, SUW-SMLs will be directed towards projects</p>

²¹ [How the allocation of IDA20 should shift to ease the recovery from the Covid-19 crisis in lower-income countries | ODI: Think change](#)

²² [How IDA can support recovery from the Covid-19 crisis | ODI: Think change](#)

²³ [Exit from aid: an analysis of country experiences | ODI: Think change](#)

Organization	Comments	Response/Action
	<ul style="list-style-type: none"> <li data-bbox="321 321 1335 678">• <i>We welcome the expansion of the Regional Window. It should be a sizeable component of IDA20 given the pressure for the procurement and financing of Global Public Goods (it was less than 10% of resources in IDA19). However, the uptake of GPGs would require a review of the country-based lending model and grant, rather than loan financing, of global and regional public goods in the long term. The low uptake of vaccine facilities has once again shown that the country-based lending model of MDBs does not generate the right incentives for the financing and procurement of GPGs. Future reforms will need to deal with the long- standing tension between the multilateral development banks – and among them IDA – being the best-placed institution to finance global public goods, and their current country- based financing and resource allocation model. Shareholders should give a clearer mandate and provide resources for the provision and grant financing of GPGs, including vaccine procurement.²⁴</i> <li data-bbox="321 938 1335 1206">• <i>We welcome the role of the IDA in supporting the procurement of vaccines joined up with COVAX and other institutions. There should be greater incentives for countries to access vaccines, including at grant financing terms, in the Regional Window (RW) (more below). Despite the challenges in securing and financing vaccines, uptake of the MDB facilities for vaccine procurement and distribution has been low so far in lower-income countries. Many factors are behind this low uptake, including the need to use them at the expense of the country allocation (resources for vaccine procurement are now on top of the country allocation) and the fact that governments may also have been reluctant to finance additional vaccine coverage from borrowing.²⁵</i> <li data-bbox="321 1247 1335 1304">• <i>The offer of short maturity loans (SMLs) goes towards the direction we advocated for, for a greater volume of resources available at the expense of concessionality given interest</i> 	<p data-bbox="1356 134 1965 191">aligned with the IDA20 overarching theme of building back greener, more resilient, and more inclusive.</p> <p data-bbox="1356 326 1976 837">We recognize the need for appropriate incentives to encourage investments in regional and global public goods. Since vaccination is a country-driven decision, IDA financing for vaccine response will continue to be embedded into country allocations. IDA20 will provide more incentives for countries to implement vaccination programs by supplementing country allocations used for vaccine financing with access to the enhanced Regional Window and the use of SMLs in the SUW to provide top-up for vaccine financing. The Regional Window, which incentivizes countries to come together to address shared challenges, is part of the World Bank financing toolkit to support this effort. Since IDA18, the Regional Window can also extend financing support to regional organizations to help lead or coordinate investments in regional and global public goods. This is a topic we are closely following and where we are open to future innovations.</p> <p data-bbox="1356 943 1976 1149">In IDA20, financing support for COVID-19 vaccines, therapeutics and diagnostics (VTD) will be channeled primarily through country allocations (PBA) and supplemented with access to the Regional Window. The Regional Window provides a tested and well-suited framework to incentivize additional investments in financing for such programs.</p> <p data-bbox="1356 1247 1976 1328">Thank you for recognizing the important role SMLs could play in providing countries with additional concessional financing to meet their recovery and development needs.</p>

²⁴ [What MDBs \(and their shareholders\) can do for vaccine equity | ODI: Think change](#)

²⁵ [What MDBs \(and their shareholders\) can do for vaccine equity | ODI: Think change](#)

Organization	Comments	Response/Action
	<p><i>rates are still low, globally, and the need to harden terms to expand lending volumes.</i>²⁶ We welcome the explicit reference of its assessment in the IDA Mid-Term Review. We would also welcome greater clarity about the projects to be funded via SMLs (both in the country allocation or the Scale-Up Window, at the moment, only generic in the latter). Projects funded should focus only on short-term interventions that can potentially generate returns in the short- to medium-term to avoid putting pressure on fiscal spending in the next 6 to 9 years when loan amortisation is expected to start.</p>	<p>SMLs offered through the regular performance-based allocation system (PBA-SMLs) will provide eligible countries with increased country allocations. All operations financed through Investment Project Financing (IPF), Development Policy Financing (DPF), or Program-for-Results Financing (PforR) will be eligible for PBA-SMLs. As discussed in Box 3.1. in the Ask Paper, clients indicated considerable interest for SMLs across all lending instruments to finance operations that are expected to generate returns in the short- to medium-term. SMLs offered through the SUW (SUW-SMLs) will help eligible countries to meet heightened external financing needs in the aftermath of COVID-19. SUW-SMLs are provided in addition to country allocations and will enable countries to further scale-up investments in the short and medium-term. SUW-SMLs are expected to target operations that are aligned with one or more of the four pillars of the World Bank Group’s COVID-19 response framework. Examples include operations in support of vaccine delivery, social protection operations, and priority policy reforms.</p>
Oxfam International	<p>VACCINES</p> <p>We are very pleased to see the draft package includes access to the Regional Window for additional financing for vaccine programming above countries’ existing IDA allocations. This is crucial in order to ensure countries do not displace urgent development needs with crucial vaccine programming, but rather that they have adequate financing to do both. We encourage the Bank to ensure the size of the Regional Window is scaled up substantially to ensure adequate resources available for vaccine programming regardless of the replenishment scenario that materializes.</p>	<p>We thank Oxfam for this comment. We confirm that additional financing for COVID-19 vaccines, therapeutics and diagnostics (VTD) will be available through the IDA Regional Window in each of the IDA20 Financing Scenarios, with the High Scenario offering the most support.</p>
Results Canada	<p>Use of Regional and Private Sector Windows to Fight COVID-19</p> <p>We are pleased to see that the Regional Window will serve to “provide additional resources to IDA countries for COVID-19 vaccine purchases and delivery of vaccination programs.” We note that the Private Sector Window has served to address supply gaps in health systems. We recommend that the Private Sector Window should also be used to supplement the Regional Window in funding initiatives associated with vaccination delivery capacity.</p>	<p>Thank you for this comment. We agree that all relevant pieces of IDA’s financing toolkit should be leveraged to support efforts to fight COVID-19 as prioritized by IDA countries. The Regional Window is central to the IDA financing architecture and has already been leveraged to support the strengthening of regional health systems in the past (e.g., in the case of the West Africa Ebola epidemic) and will be further leveraged in IDA20 to channel additional financing for COVID-19 vaccines, therapeutics</p>

²⁶ *How IDA can support recovery from the Covid-19 crisis | ODI: Think change*

Organization	Comments	Response/Action
		<p>and diagnostics (VTD). The Private Sector Window may also be used to support private investments in relevant VTD efforts, such as for de-risking IFC's investments in support of vaccine manufacturing and/or distribution, as well as support of private clinics and healthcare facilities in PSW eligible countries.</p>
Wemos	<p>Positive remarks We are glad to see that the Regional Window now got explicit prompts on ‘financing for rollout of COVID-19 vaccination programs’ as additional to country IDA allocations. We appreciate this as it partly responds to what we have been stressing: that any additional resource needs for Covid-19 response should not crowd out or distort other priorities in national or regional development plans.</p> <p>Coupled with the intention to increase resources for this window, which we hope will be a significant one, we express the hope that it stimulates IDA countries to tread the path inter-governmental collaboration in access to vaccination for all, including in efforts to expand local/regional manufacturing capacity. This is something we emphasise in our advocacy with CSOs in the global South and North.</p> <p>Concerns and suggestions</p> <p>The finance via the Regional Window for rollout of COVID-19 vaccination programs should be based on grants, not loans. COVID-19 response is an extra burden piling up on the development challenges, in health and other areas, that lower income countries were already facing.</p> <p>⇒ Our suggestion for IDA20: it should be debt-free additional resources to be channeled through the Regional Window, at least when it comes to COVID-19 vaccination rollout, to not crowd out or distort other priorities in development.</p>	<p>We thank Wemos for this comment. The equitable and inclusive rollout of COVID-19 vaccinations and accompanying strengthening of health systems and pandemic preparedness will be a critical priority in IDA20.</p> <p>We confirm that additional financing through the IDA Regional Window will be available in each of the IDA20 Financing Scenarios, with the High Scenario offering the most support.</p> <p>An immediate global priority is to support the acquisition and rollout of COVID-19 vaccinations, and ensure continuity of prevention, testing, treatment and care for COVID-19 patients, as well as strengthening essential health services, enhancing pandemic preparedness, and supporting countries to achieve universal health coverage.</p> <p>We share the concerns about the higher debt burdens that may arise from countries’ additional investments necessary to respond to the crisis. This point connects to the World Bank’s efforts to ensure debt sustainability in lower-income countries. This includes the IDA grant financing framework, where IDA-only countries at high risk of debt distress or already in distress received financing on 100% grant terms (for their regular country allocations and/or when leveraging financing from the Regional Window). Other countries with more favorable debt outlooks have more limited access to grants but do borrow on highly-concessional terms.</p> <p>This model ensures that concessionality and grants are targeted to where they are most needed, and – thanks to the</p>

Organization	Comments	Response/Action
		reflows from countries in sustainable debt situations (coupled with market borrowings) – this allows IDA to offer a multiplication effect of over 3x on donor contributions (i.e., \$1 in donor contribution currently translates to more than \$3 in financial resources available to IDA countries).

Non-Concessional IDA Financing

Organization	Comments	Response/Action
ODI – A Global Affairs Think Tank	<p>PSW</p> <ul style="list-style-type: none"> • Investment in healthcare: The focus of the IFC to ramp up its investment in healthcare is certainly welcomed, especially through the global health program. DFI investment in the health sector is low overall. It is also largely directed towards infrastructure and pharmaceuticals in upper-middle-income and lower-middle-income countries.²⁷ A shift away from infrastructure to catalysing health markets is necessary, especially strengthening health supply chains. This will require higher-risk taking and more innovative structuring. Use of the PSW will enable this. 	<p>Thank you, we agree on the importance of private sector investments in healthcare. The PSW supports IFC’s investments in health in difficult environments. An example is support extended towards IFC’s Africa Medical Equipment Facility, in which IFC is partnering with other financial institutions in Africa and medical equipment manufacturers worldwide to help small and medium-sized healthcare providers in East and West Africa secure local currency loans to purchase or lease needed medical equipment. As another example, in Uganda, support from IFC and the PSW is ensuring that the country’s second largest healthcare provider remains operational to the public, including low-income population.</p>
Oxfam International	<p>PRIVATE SECTOR WINDOW</p> <p>We are distressed to see the draft policy package propose an increase in the size of the Private Sector Window (PSW). The recent Independent Evaluation Group report indicates there is still a lack of evidence on the development effectiveness of PSW and cites challenges getting money out the door, and in financial additionality. Given the limited resources and massive public financing needs right now, instead of increasing the size of the PSW, it should be significantly scaled back—or closed—in IDA20. This funding should instead go to top up country allocations for vaccines, and to make them grant based for all countries, or to other urgent public sector priorities. We would argue that there is little justification to divert aid resources to the private sector at this time of crisis and that the Bank and its donors should be maximizing public sector investments through IDA20.</p>	<p>Thank you for sharing your concerns over the PSW. The objective of the IEG report was to provide some evaluative insights from PSW early implementation in IDA18. As such it excluded any data analysis from IDA19 which would have allowed for a more favorable assessment of PSW utilization, in terms of portfolio and pipeline – we expect full utilization of the \$1.7 bn PSW allocation by IDA19-end. Also, the scope of the IEG assessment excluded the analysis of development outcomes. PSW-supported projects’ development effectiveness will be evaluated once the portfolio is mature enough. The private</p>

²⁷ DFI health investments as a Covid-19 response: the need for more risk-taking and innovation | ODI: Think change

Organization	Comments	Response/Action
		<p>sector is the main source of jobs in IDA countries and lies at the center of sustainable development. The PSW, through IFC investments and MIGA guarantees committed to date, is creating an estimated 800,000 to 1 million jobs in IDA PSW eligible countries. In the most challenging markets though, there are heightened risks and unpredictability that prevent private sector investments from happening at the necessary scale, particularly in the wake of the economic impact of COVID-19. The PSW helps catalyze high impact investments in the poorest and most fragile countries. In IDA19, for example, PSW has supported lending to Micro and Small enterprises and those at the bottom of the pyramid across Africa, food manufacturing and distribution in Yemen, and wind power generation in Djibouti. These projects would not have gone forward without IDA PSW's support. For every dollar of PSW resources in IFC and MIGA supported projects, there are five dollars directed to private sector investments. For the effective use of IDA resources, management continues to closely monitor utilization of the PSW, as well as other facilities, and reallocates resources at the mid-term review, to the greatest areas of need in consultation with IDA's shareholders.</p>
Wemos	<p>We advocated a discontinuation of the IDA Private Sector Window (PSW) in health, considering the general lack of evidence regarding its effectiveness and because of counterproductive results of its use in the health sector thus far (see page 7 of hyperlinked paper).</p> <p>We are concerned about the fact that the draft IDA20 report instead proposes an increase for the IDA-PSW with special emphasis on business in healthcare through the IFC Global Health Platform and Scaling Health in Africa initiative.</p> <p>⇒ Our suggestion for IDA20: stop diverting IDA resources to the commercial sector in health service delivery and financing and concentrate on strengthening the public sector and public resources for health to ensure equitable access to essential health services.</p>	<p>Thank you for raising these concerns. Please see response above, on a similar question.</p>

Lending Terms

Organization	Comments	Response/Action
<p>Oxfam International</p>	<p>BALANCE SHEET OPTIMIZATION</p> <p>We recognize the pressure on IDA’s balance sheet with donors wanting resources to extend further. However, we are concerned by the proposed changes to IDA20’s financing framework, in particular the proposal to substitute grants with highly concessional loans, and, more worryingly, to provide a portion of many IDA countries’ allocations as short- term maturity loans. This move will harden the terms of IDA at a time when countries need the best terms possible and during the deepest economic recession in nearly a century. As civil society, a key reason we champion IDA is because it is so concessional, and we think the Bank is treading on a slippery slope here. We ask that these terms be revised or reserved for only those countries in stronger financial positions. To this end, we call on IDA Deputies to provide a strong and robust replenishment to avoid such trade-offs.</p> <p>We also ask for the IDA20 language in this section to be explicit about the direction the Bank intends to go in; that this aims to be a temporary measure, and that while financing terms are open to revision, the aim will be to maximize IDA’s concessionality as a key added value of IDA.</p>	<p>Thank you for highlighting your concern. Paragraph 154 of the Deputies Report notes the temporary nature of SMLs.</p> <p>The balance sheet optimization measures are aimed to further stretch the reach of every dollar of donor contribution for the benefit of IDA countries at this critical time, while continuing to ensure the strength of IDA’s triple-A rating and long-term financing sustainability. While we understand the concerns around the substitution of grant financing with 50 -year credits for IDA-only Yellow-light countries (at moderate risk of debt distress), we would like to highlight that this change would keep the grant element of IDA’s package of financing for these countries largely unchanged with only a marginal reduction (from 77% to 73%). These countries (IDA-only Yellow-light) would also see a six percent nominal increase in volumes relative to the original IDA19 levels (based on the mid-high scenario), thus compensating for the small reduction in concessionality. Similarly, the introduction of concessional shorter-term maturity loans (SMLs) to be offered during IDA20 (in line with the availability of related temporary capital headroom) allows eligible countries greater opportunity to scale up their unearmarked concessional programming towards building back better. (Also note that SMLs will not be offered to countries in high risk of debt distress (IDA-only Red-light countries) which would still receive 100% of their financing as grants.) As highlighted in the draft Deputies Report, the introduction of these new financing terms is not expected to lead to changes in the external risk of debt distress classification of eligible IDA countries.</p>

ANNEXES

Windows

Organization	Comments	Response/Action
<p>ODI – A Global Affairs Think Tank</p>	<p>PSW</p> <ul style="list-style-type: none"> <p>Financing instruments: On p. 147, the PSW is deployed through several instruments including the use of senior loans. Our research²⁸ argues that there is a much greater need for the use of high-risk capital, especially in IDA-LICs and FCS. Our work finds that the vast majority of DFI investment is funded from their own balance sheet resources and takes the form of ‘vanilla’ senior debt lending to corporates or projects. This type of DFI investment generally finances investment that is bankable commercially but which cannot be financed affordably due to gaps in capital markets. This type of DFI investment also provides reassurance to private investors in these underdeveloped markets. In many markets, however, especially IDA-LICs and FCS, investment is not yet commercially viable so DFIs can also provide risk capital to shift the risk-return profile of an investment to help it become commercially bankable. Most provide risk capital of some form, but this does not constitute the majority of DFI investment as their balance sheets and business don’t allow this. This is the value of the PSW: it arguably enables DFIs to provide high-risk capital across the bottom and middle risk levels in the capital structure of investment from equity at the bottom of the capital stack which carries the most risk²⁹, through to mezzanine finance in the middle (e.g. preferred equity, convertible grants and loans, subordinated debt), with senior debt at the top of the capital stack which carries the least risk. Senior debt is unlikely to meet these risk mitigation needs of private investors in many of these markets, so greater emphasis should be placed on concessional PSW resources being used to mainly deploy high-risk capital.</p> <p>Development impact/eligibility: on pp. 78;146. There is a high-level mention of disclosure of systematic impact but, to date, it has actually been very difficult to ascertain the development impact of the PSW, especially its distributional impact and effects on poverty reduction, let alone the ‘systematic’ impacts (e.g. spillover/market creation/transformational impacts). The eligibility criteria in the implementation arrangements do not emphasise development impact or systematic impact. Given that this is a highly concessional resource with unique properties to fight poverty, more attention could be placed on development impact and on requiring the PSW to explicitly target poverty reduction. It should be required to demonstrate impact and the expectations/impact objectives should be set out at the start. There seems to be a lot of focus on the PSW’s effectiveness in underwriting the risks of IFC’s and MIGA’s investments that it can’t take alone on their balance sheets rather than on its development impact.</p> 	<p>Thank you. We agree on the continued need for PSW resources to support IFC’s own-account investment in IDA-LIC and FCS, and in turn the investments of other financial institutions and private sector partners.</p> <p>IDA PSW resources enable IFC and MIGA to support investments expected to have high development impact which would otherwise not happen due to high risks, such as credit, liquidity, currency and political risks. The AIIM and IMPACT scores of PSW-supported projects is higher than the average scores of IFC and MIGA’s respective portfolios overall. While we collect information on the aggregate AIIM and IMPACT scores of all PSW projects, so far these are ex-ante estimates only, as PSW portfolio is still too young to perform a formal impact evaluation. As of December 6, 2021, only one project has been on IDA books for more than 3 years. We expect a preliminary evaluation of PSW-supported projects (with longer than</p>

²⁸ *Development finance institutions: the need for bold action to invest better; Blended finance in the poorest countries: the need for a better approach*

²⁹ Risk is related to the cash flow priority associated with each form of capital. Senior debt has the highest priority in terms of repayment from project cash flows whereas common equity the least.

Organization	Comments	Response/Action
		three-years on IDA's balance sheet) to be presented at Mid-Term Review.