

IDA20 DRAFT DEPUTIES REPORT

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1. Raise Your Voice Saint Lucia Inc

Comment:

These intervention are critical and timely; however, we opine that debt forgiveness is key to economic recovery after COVID-19.

2. Bread for the World

Comment:

Summary

- 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.
- The IDA20 replenishment should make the case for an ambitious financing package of \$100 billion.

Healthy Diets

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.

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.

Smallholder Farmers

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.

Disadvantaged and Vulnerable Groups

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 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.**

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.

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.**

Results Measurement System

Bread for the World welcomes the continued inclusion of Tier 1 indicators:

- 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

as well as Tier 2 indicators:

- 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

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.

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.

Financing Framework

Finally, **IDA20 should receive an allocation of \$100 billion**, an ambitious financing package that reflects the ongoing COVID-19 pandemic and its effects and the need to prevent the loss of previous development gains.

In an era of rising global hunger and malnutrition, IDA is the largest source of concessional financing and grants for countries to access for their own development. As also noted in the IDA20 deputies' report, IDA made \$5.8 billion in new commitments for agriculture and social protection for the period FY2018-2020. It has projected commitments of more than \$20 billion for FY2021-2022. Also, IDA's nutrition portfolio has grown from \$10 million in FY2012 to \$665 million in FY2021.

A \$100 billion financing package would enable IDA20 to make policy commitments to help countries combat food insecurity and malnutrition due to food price increases, disruptions in food supply chains (caused by problems such as market closures and interruptions in trade, transport, and logistics services), health service disruptions, and income losses. Support will also focus on limiting longer-term drivers of food insecurity, including by (i) supporting policies and programs to accelerate the transition to more productive, resilient, and sustainable food systems; (ii) promoting farming systems that are more nature- and climate-smart and that produce a more diverse mix of foods, (iii) supporting resilient supply chains, (iv) reducing post-harvest food losses, (v) improving food safety and hygiene in food distribution channels, and (vi) forging better linkages among production and consumption centers.

3. Youth Initiative for The Promotion

Comment:

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.

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. Policy commitment under the Gender issue should be our target priority

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.

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

Support the general Integration and enabling infrastructure for renewable energy supporting Service delivery differential constraints bases on gender and disability. With the maintenance of transparency of public debt borrowing.

IDA to broaden it program that seek to enhance peace and mitigate the impact of conflict and violence and support humanitarian development peace focus on comprehensive dialogue and engagement with stakeholder and development partnering humanitarian security mediation, diplomacy domain, which is important innovation through engagement on fragility conflict violence.

Look into challenges confronting refugees, constrained in polices implementation of refugee, lack of budget, funding or resources, lack of institutional capacity, lack of Coordination between nation at the local gap in awareness of relevant policies by authorities, lack of access to asylum, justice system barrier resulting from administration requirement, unstable security situation and general lack of economic development, Job and infrastructure community. Support refugee to education and Health, effective access to labour market. Mitigate the shock cause by refugees inflow

and create social and economic development opportunities to refugees host communities and maintain Support on refugee implementation policy

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.

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.

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.

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.

4. SDG2 Advocacy Hub

Comment:

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.

Some overarching reflections:

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.

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.

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.

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.

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.

The Ceres2030 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.

Specific comments:

- 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.
- 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.

Comments on Policy Commitments:

Pg. 49 rec. 4 It would be strengthened by adding the highlighted.

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,

Pg. 56, rec. 3

Transitioning key systems for adaptation and mitigation: Support at least 50 countries (including at least 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.

Given the urgency of IDA countries to adapt to climate change, it would be better to have separate policy commitments for adaptation and mitigation. It is crucial that agriculture and food systems in all IDA countries are supported to adapt to changes already underway.

Pg. 70

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.

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.

Additional comments:

Page 26, Box 3.2—Food and Nutrition Security

- 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/60f58b511ad9b1c32cf264c/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
Supporting food and nutrition security will remain a priority in IDA20, with a focus on addressing drivers of food insecurity and strengthening food systems. IDA will continue engaging clients and development partners to address food security challenges, including through rapid country diagnostics and data-based monitoring instruments. As part of the policy package, IDA20 will help countries combat food insecurity and malnutrition due to food price increases, disruptions in food supply chains (due to market closures, interruptions in trade, transport and logistics services, etc.), health service disruptions and income losses. Support will also focus on longer-term drivers of food insecurity, including (i) repurposing of agricultural policies and support programs **to improve the livelihoods of smallholder farmers and farm workers** and accelerate the transition to more **inclusive**, productive, resilient and sustainable food systems, (ii) promoting farmingsystems that are more nature- and climate- smart and produce a more diverse and **nutritious** mix of foods, (iii) supporting resilient supply chains, (iv) reducing post-harvest food losses, (v) improving food safety and hygiene in food distribution channels, and (vi) better linking production and consumption centers. Furthermore, IDA will support investments in agricultural data collection, analysis and use for decision-making; research and development to develop and disseminate technologies and practices that are climate-smart and enable increasing the micronutrient content of foods and raw materials, and advocate for policy and regulatory reforms to improve the efficiency and integration of domestic food markets.

Page 29, para 53: Consider adding the Famine Action Mechanism (FAM) here as well—for a more comprehensive view of crises.

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/>)

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.”

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.

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”.

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.

5. Partnership for Transparency

Comment:

PTF Comments on Draft IDA20 Deputies' Report (November 2021)

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.

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.

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.”*

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.

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.

Second, we welcome the affirmation (paragraph 62 of the draft report) that *“IDA will seek to foster more inclusive governance by strengthening platforms for greater social accountability and citizen engagement.”* 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).

To address these issues, we respectfully suggest that the commitment in para 62 of the report to foster *“greater social accountability and citizen engagement”* should be strengthened by adding the following specific actions:

(a) IDA will review and share *how* citizen and CSO engagement commitments under the recent IDAs have been implemented, outcomes achieved, and lessons learned by the end of CY22; and,

(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 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.

Thank you.

Attachment: Policy commitments related to citizen/CSO engagement under IDA-16 to IDA-19

Citizen and CSO engagement relevant narrative in the IDA Replenishment Reports of the Executive Directors to the Board of Governors	Policy Commitments, Results Indicator in RMS and Achievement
<u>IDA16 (2010-2013)</u> . To enhance accountability and ownership, IDA will strengthen its contacts in recipient countries with parliaments and Civil Society Organizations (Page 14). The importance of Civil Society Organizations (CSOs) in the development process was recognized in the Accra Agenda for Action (Footnote 21).	Not applicable as IDA16 did not have policy commitments. No CE relevant indicator in any RMS Tier.
<u>IDA17 (2014-17)</u> . IDA will also increasingly support initiatives that enable greater openness in governments and closer interaction among citizens, the private sector and the state (para 29). Introduced use of beneficiary feedback in IDA-supported projects (para 47, Annex 1-Table 1-page 61). RMS- Tier 3 (Table 2c-page 79).	<i>Achievement:</i> 92 percent of projects include beneficiary feedback at the end of FY17 compared to 38 percent at the beginning of the IDA17 cycle.
<u>IDA18 (2017-20)</u> . Governance and Institutions added as a Special Theme for the first time (page 45-49). Participants welcomed the inclusion of policy commitments fostering demand-side governance including those on citizen engagement and open government. They noted that for interventions supported by IDA to be successful and sustained, governments must develop institutions that are capable, efficient, inclusive, and accountable to citizen needs. (Para 110, page 46). Policy commitments include: integrate citizen engagement and beneficiary feedback into service delivery operations; strengthen open, transparent and inclusive governance through Open Government Partnership (OGP) commitments (page x). Support projects in at least 10 IDA countries in the development and implementation of user feedback and/or enhanced GRMs for service delivery that ensure participation by women in these processes (page xi).	<i>Achievement:</i> 50 countries have been supported with enhanced GRM and/or multiple additional beneficiary feedback interventions. 95% (FY19) Projects using beneficiary feedback (%) (page 83).
<u>IDA-19 (2020-2023)</u> . <i>Governance is retained as a Special Theme (page ix and 55-61)</i> . Priorities include addressing the issue of “limited mechanisms for citizens to hold their government to account” (page x and Para 118). Citizen participation is achieved through multistakeholder platforms (SDG16.7) (Para 118). Drawing on lessons from the IEG report on the implementation of IDA18 Special Themes, the approach in IDA19 will aim to ensure that citizen engagement in IDA operations is broadened and deepened with concrete steps, including building capacity, strengthening monitoring and reporting, and regular outreach (Para 119). <i>Participants emphasized the importance of enhancing social accountability and citizen engagement</i> . Open, participatory, and responsive governance is critical for governments to provide more inclusive, effective, and equitable public policies and service delivery. Openness and transparency are fundamental ingredients to ensuring information is available and accessible to the public, thus facilitating the public’s informed participation in policy-making. IDA	The only policy commitment is for multi-stakeholder platforms. No mention CE/CSE specific commitment. RMS retains the Tier 3 Indicator - Projects using beneficiary feedback (%). <i>Achievement:</i> Not yet available

will help increase social accountability in IDA countries by supporting platforms that systematically involve a range of stakeholders, including women as well as vulnerable groups, in decision-making and implementation of public policies. (Para 126).	
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Comments and question may please be addressed to Vinay Bhargava, Chief Technical Adviser, PTF (vbhargava@ptfund.org)

6. Global Coalition on Social Protection Floors Ad hoc Group on IDA20

26 November, 2021

Prepared by the Global Coalition on Social Protection Floors ad hoc group on IDA20, whose members represent Act Church of Sweden, Action Contre la Faim - France (ACF - France), the International Trade Union Confederation (ITUC), Oxfam International, Save the Children, and the We Social Movements (WSM).

Comment:

Comments to IDA20 draft Deputies Report – Social Protection

I. General

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.

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.

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.

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.

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 age (in particular in cases of sickness, unemployment, maternity and disability) and older persons.

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.

II. Detailed comments on the narrative text

A. Human capital special theme

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.

“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”.

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”.¹

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 protection².

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), International Health Regulations (para 85) and Political Declaration on Universal Health Coverage (para 85).

Suggestion: Insert the following in the first sentence in para 88: Building on the robust progress in IDA19, and in line with the framework for action towards universal social protection systems adopted by the ILC³, 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.

Para 92

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.

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.

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](#)).

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

¹ Record of proceedings, International Labour Conference – 109th Session, 2021 [wcms_804457.pdf \(ilo.org\)](#)

² S. Kidd, D. Athias ; Development Pathways / Act Church of Sweden (2020). [Hit and Miss: An assessment of targeting effectiveness in social protection](#).

³ Record of proceedings, International Labour Conference – 109th Session, 2021 [wcms_804457.pdf \(ilo.org\)](#)

United Nations (UN) and its agencies, the European Commission, bilateral partners, Civil Society Organizations (CSOs), and the private sector.”

B. Gender and Development special theme

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.

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 floors would be effectively supporting gender equality by challenging gender norms; including through the recognition, redistribution and reduction of unpaid care work.

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.

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.

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).

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.

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).

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.

III. Comments on Policy commitments and RMS

A. Human capital special theme

Policy Commitment 1: 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

Policy commitments 3, 4 and 8: we regret to see that no substantive changes have been made to the policy commitments regarding SP.

Policy commitment 6: we reiterate our support to the universal view adopted in this policy commitment.

RMS: we regret to see that the RMS does not mention universals social protection floors, contrary to the GCSPF's recommendations.

B. Gender and development special theme

Policy commitments 2 and 3: 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

RMS: we regret to see that the RMS does not mention childcare services, contrary to the GCSPF's recommendations.

7. Bank Information Center

Comment:

BIC's Comments on IDA20 Draft Deputies Report

November 2021

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.

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.

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:

Human Capital

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.

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 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.

Climate

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:

Climate Change

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.
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.

Preventing SEA/H

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:

Human Capital

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**.

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.

Stakeholder Engagement

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.”

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 the following language (in bold) below be added to the Human Capital PC 3 accordingly:

Human Capital

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**.

8. Leadership Collaborative to End Ultra-Poverty

Comment:

Friday, November 26, 2021

Dear IDA Resource Mobilization Team,

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.

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.

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 and marginalised segments. This could be achieved through modest adaptations to the language, for example through the addition of the following underlined phrases:

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.

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.

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.

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.

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.

We therefore propose that the target for the minimum number of people reached by safety nets be qualified and set at 44-54 million, excluding temporary COVID-19 coverage, with a majority in the first quintile.

Building from the numerical targets, there are two related concerns with the proposed indicators that could have a substantial impact on economic inclusion:

- 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.

Our request is:

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.

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.

Anne Hastings, Facilitator, Leadership Collaborative to End Ultra-Poverty, is available to provide any clarification required at ngocollaborative@gmail.com.

Yours truly,

Jackie Aldrette, Deputy Secretary General, AVSI
Foundation and Managing Director, AVSI-USA

Herve Bernard, Director, Social and Inclusion,
Humanity & Inclusion

David Diggs, Executive Director, Beyond Borders

Joshua Goldstein, Researcher & Consultant in
extreme poverty and disability inclusion

John Stevens, CEO, The BOMA Project	Chantal Buard, CEO, Impact Atlas
BRAC BRAC Institute of Governance and Development	Chris Law MP, SNP MP Dundee West, Spokesperson for International Development and Climate Justice and Chair of the All-Party Parliamentary Group on Extreme Poverty, UK Parliament
BRAC International, including: BRAC Afghanistan BRAC Liberia BRAC Myanmar BRAC Philippines BRAC Rwanda BRAC Sierra Leone BRAC South Sudan BRAC Tanzania BRAC Uganda	Jamie Drummond, Co-Founder, ONE Campaign Deborah Foy, Global Executive Director, Opportunity International Norwegian Refugee Council Joanne Carter, Executive Director, RESULTS Chris Dendys, Executive Director, Results Canada
BRAC UK	Aaron Oxley, Executive Director, RESULTS UK
BRAC USA	SunKyung Kim, National Director, Results Korea
Syed M. Hashemi, Professor, BRAC University	Nathalie Laidler-Kylander, CEO, Trickle Up
Concern WorldWide	Dianne Calvi, CEO, Village Enterprise
Maida Zafar, Financial Inclusion and International Development Consultant	Laurie Adams, CEO, Women for Women International
Carine Roenen, Executive Director, Fondasyon Kole Zepòl (Fonkoze)	Gertrude Kabwazi, Executive Director, Yamba Malawi
Yves Moury, President & CEO, Fundación Capital	
Jean-Francois Tardif, National Coordinator, Global Poverty Solutions Society	

9. Care International

Comment:

CARE International Submission to the Draft IDA20 Deputies' Report

This submission sets out CARE International's response to the [Draft of IDA20 Deputies' Report](#) on IDA20's strategic priorities, released on 13 November 2021.

It assesses the overall IDA20 policy direction and provides specific inputs on the cross-cutting issues of crisis preparedness, and special themes (1) Human Capital; (3) Fragility, Conflict and Violence; (4) Gender and Development; and (5) Jobs and Economic Transformation. As part of this review we have identified three game-changing priorities that could help shift the dial to "[Building Forward](#)" from COVID-19 through the early IDA20 replenishment, and ensure IDA20 provides the highest value for money and impact on the ground, including for those women and girls that are hardest to reach in IDA countries.

We trust that these inputs are helpful as you finalise the report, and inform the final meeting in Tokyo in December, and are happy to discuss specific points in more detail.

For questions and further inputs please get in touch with Mareen Buschmann, Global Advocacy Lead on Women's Economic Justice, on buschmann@careinternational.org.

I. Overall recommendations for IDA 20

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 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.

- 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.

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.

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.

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.

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.

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, 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.

II. CARE's three priorities for IDA 20 and the IDA20 Deputies Report

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:

1. **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 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.
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.
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.

III. Recommendations on Cross-Cutting Issues and Special Themes

I. Cross-cutting issue: Crisis Preparedness

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.

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](#).

Specifically, IDA20 should:

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.

II. Special Theme 1: Human Capital

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.

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 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.

IDA20 should integrate a focus on gender equality throughout the special theme on human capital. Specifically, IDA20 should:

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 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.

III. Special Theme 4: Fragility, Conflict and Violence

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.

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).

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.

Specifically, IDA 20 should:

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 *delivery*—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 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.

IV. Special Theme 4: Gender and Development

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.

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.

Specifically, IDA20 should:

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 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.
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**. This 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”.
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.
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.

V. Special Theme 5: Jobs and Economic Transformation

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 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.

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.

Specifically, IDA20 should:

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 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.

END

10. Eurodad

Comment:

Eurodad's Comment on Executive Director's Draft on IDA20

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.

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.

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.

11. Global Poverty Solutions

Comment:

GPS submission on the IDA 20 Policy Package – November 26, 2021

Introduction

First a big thank you for offering an opportunity for input into the IDA 20 policy package.

We would like to present a number of recommendations, all based on one fundamental question: *What does IDA have to offer in exchange for a 20% increase in its budget from IDA 19?*

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.

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.

Recommendations for Tier 2 Targets of the Result Measurement System.

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.

- 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.

The access to water minimum target should be what was achieved under IDA 18 + 25%, i.e. 40 million people.

- 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.

The range of large scale learning assessments should be 30-45.

- 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.**
- 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 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 “expand 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.

The access to nutrition target should be set at 210-225 Million.

- 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.

The social safety net coverage target should be set at 75 million, excluding temporary coverage related to the pandemic.

There are other incongruities related to targets, in respect of IDA 19 this time, which are explained in the Annex to this document.

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.

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.

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.

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.

It is not eliminating malnutrition, but it is at least about making sure more children have access to nutrition services.

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.

ANNEX

A few anomalies in the IDA19 Mid-Term Review

In Annex 2 of IDA19: IMPLEMENTATION STATUS AND PROPOSED REALLOCATIONS, there are several instances where the minimum (and even sometimes the maximum) of the expected range for FY 21-FY22, is inferior to the FY21 results, which is illogical.

For Beneficiaries of SSNs, the range for FY21-FY22 is 30-50 million and the FY21 results is 125 million

For Children Immunized, the range for FY21-FY22 is 30-75 million and the FY21 results is 35 million

For Deliveries with skilled attendant, the range for FY21-FY22 is 8-20 million and the FY21 result is 11 million

For People with improved urban conditions, the range for FY21-FY22 is 10-12 million and the FY21 result is 11 million

A correction or an explanation would be useful.

12. ODI – A Global Affairs Think Tank

Comment:

IDA20 Replenishment, Building Back Better from the Crisis; Toward a Green, Resilient and Inclusive Future ¹

Volumes and terms of IDA assistance in IDA20

- *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.*²
- *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.*³ 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 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.⁴ 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.
- *IDA resources should increasingly be spent via development policy loans and deployed flexibly. Using Development Policy Financing (DPFs) (or instruments akin to budget support) means funding is channelled*

¹ These comments were offered by researchers across ODI – a global affairs think-tank – Annalisa Prizzon, Hazel Granger, Laura Abramovsky, Cathal Long, Tom Hart, Shakira Mustapha and Samantha Attridge. The comments here reflect their views only.

² [How IDA can support recovery from the Covid-19 crisis | ODI: Think change.](#)

³ [Multilateral finance in the face of global crisis | ODI: Think change](#)

⁴ [Multilateral finance in the face of global crisis | ODI: Think change](#)

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.⁵ The share of IDA projects approved as DPFs fell again in 2021 though.⁶

- *The crisis is not yet over and greater support should be allocated to the Crisis Response Window (CRW).* 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 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.⁷
- *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.⁸ 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.⁹
- *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.¹⁰
- *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.¹¹

⁵ [How IDA can support recovery from the Covid-19 crisis | ODI: Think change](#)

⁶ [How the allocation of IDA20 should shift to ease the recovery from the Covid-19 crisis in lower-income countries | ODI: Think change](#)

⁷ [How the allocation of IDA20 should shift to ease the recovery from the Covid-19 crisis in lower-income countries | ODI: Think change](#)

⁸ [How IDA can support recovery from the Covid-19 crisis | ODI: Think change](#)

⁹ [Exit from aid: an analysis of country experiences | ODI: Think change](#)

¹⁰ [What MDBs \(and their shareholders\) can do for vaccine equity | ODI: Think change](#)

¹¹ [What MDBs \(and their shareholders\) can do for vaccine equity | ODI: Think change](#)

- *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 rates are still low, globally, and the need to harden terms to expand lending volumes.*¹² 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.

Domestic resource mobilisation (DRM)

- 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. *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.¹³
- We welcome support for policy reforms that enhance progressivity to improve income and wealth redistribution and create inclusive economies. However, *the proposal should be more realistic about the capacity of tax systems in IDA countries to achieve income and wealth redistribution*. 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 short term.¹⁴ 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.
- 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.¹⁵ 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.
- *Support for countries to report and review the effectiveness of tax expenditures across tax instruments* 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. *Investments in technology and digitalisation should also be accompanied by behaviour change management to ensure systems are used at their potential*. 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.

¹² [How IDA can support recovery from the Covid-19 crisis | ODI: Think change](#)

¹³ [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](#)

¹⁴ [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](#)

¹⁵ 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>

Human capital

- 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.
- While the commitment to directing IDA investments in human capital is welcome, there seems to be *a lack of ambition on the plans for supporting countries to improve their public spending on human capital*, especially when compared to the plans for support to tax systems.
- In particular, *the equity of spending is not mentioned, in contrast with the focus on fair and progressive revenue policies*. 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.¹⁶ 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.¹⁷
- 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-financing ratio can be reduced to maximise the additionality of these funds on top of the country allocation.
- 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.

Digitalisation

- 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 *data governance*; the role of government, in particular, in developing the contributions and capabilities of digital government *institutions, strategies, and teams*; 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.

Debt

¹⁶ 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).

¹⁷ 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>

- 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](#). *Finding ways to incentivise reforms to reduce debt vulnerabilities remains crucial though, especially when there is little domestic appetite.* 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.¹⁸
- 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 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.

Private sector window (PSW)

- **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.
- **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.¹⁹ 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.
- **Need for strategic and coordinated investment:** p. 69. The lack of investible opportunities is a major constraint countries to the mobilisation agenda in IDA-LICs and fragile and conflict-affected situations (FCS), so it is right that there should be enhanced focus on upstream work of IFC to boost the investment pipeline. It will be important and necessary for the IFC to move away from opportunistic investment to investment that is strategic and coordinated with the WBG and countries themselves to achieve transformational change. Private commercial finance will not flow freely to these countries where the local investment climate is challenging, markets are not functioning and where the risk-adjusted rate of return is uncompetitive. IFC and MIGA investment can only ever tip the balance, subsidising private finance will not work if the country fundamentals are not right, underpinning the need for better coordination and strategic intent within the WBG in this area. This requires significant upfront investment and technical assistance (funded through grants) and it takes time.

¹⁸ [Africa's rising debt: how to avoid a new crisis | ODI: Think change](#)

¹⁹ [DFI health investments as a Covid-19 response: the need for more risk-taking and innovation | ODI: Think change](#)

Further, not all work upstream will cross the finish line (i.e. political risk, changes in government resulting in changes in regulatory and policy environment, macro instability etc) so there is a need to be prepared for losses and acknowledge these risks and costs upfront.

- **‘Fund of funds’ approach.** On p. 69, we welcome the ‘fund of funds’ approach in the blended finance facility to mobilise investment in MSME incubators and accelerators. There is much need for high-risk capital to fund early-stage investment where there is a shortage of high- risk capital. Fund of fund approaches can be very catalytic as they not only mobilise private investment in the fund of funds itself, but the approach mobilises private investment into the funds it invests in and mobilises more equity and debt investment at the project level.
- **Financing instruments:** On p. 147, the PSW is deployed through several instruments including the use of senior loans. Our research²⁰ 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 risk²¹, 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.
- **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.

²⁰ [Development finance institutions: the need for bold action to invest better; Blended finance in the poorest countries: the need for a better approach](#)

²¹ 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.

13. Open Data Watch

Comment:

Dear IDA Deputies and Borrower Representatives:

On behalf of Open Data Watch (ODW), I'd like to thank you for sharing this report and to send along our comments.

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 PRESS¹, 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)². This conclusion is also echoed by our work with Data2X on gender data financing³, which finds that contributions by government and external partners must double to build strong gender data systems by 2030.

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 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.

We also call for support to build data systems that yield open data. Our most recent Open Data Inventory (ODIN) Report⁴ 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.

Thank you again for this report and for your continued support to low-income countries.

Best regards,

Lorenz



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¹ PARIS21. 2021. The Partner Report on Support to Statistics – PRESS 2021. <https://paris21.org/press2021>

² 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/>

³ Open Data Watch, Data2X. 2021. State of Gender Data Financing 2021. <https://opendatawatch.com/publications/state-of-gender-data-financing-2021/>

⁴ Open Data Watch. 2021. Open Data Inventory 2020/21 Annual Report. <https://odin.opendatawatch.com/Report/annualReport2020>

14. Oxfam International

Comment:

Oxfam Comments on the World Bank's Draft IDA20 commitments open for consultation

November 2021

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.

VACCINES

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.**

INEQUALITY AND PUBLIC SERVICES

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.

- **The policy commitment under the Human Capital Special Theme on Learning Poverty is one example where we propose specific revisions (suggested changes in red):**

Addressing learning poverty and improving learning outcomes: To fill critical learning gaps and ensure improvements in learning outcomes, support at least 20IDA countries, of which 10 are among those IDA countries with the lowest HCI, *to strengthen public education provision and* to reduce learning poverty by (i) measuring *and addressing gaps in* learning, with sex *and income-based* 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).

CARE WORK

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 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.**

- **Concretely, we propose the following addition (in red) to the childcare commitment under the Gender and Development Special Theme:**

Expanding childcare: Support at least 15 IDA countries to expand access to quality, affordable childcare, especially for low-income parents *and at least 15 IDA countries to integrate care work considerations into care infrastructure such as access to water, sanitation, energy and transport projects.*

CLIMATE CHANGE

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 their NDCs 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.**

PRIVATE SECTOR WINDOW

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.**

DOMESTIC RESOURCE MOBILIZATION (DRM)

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 the DRM commitment should specify the progressive revenue policies and be accompanied by a corresponding qualitative RMS indicator.**

- **Accordingly, we recommend revisions (in red) to the DRM policy commitment under the Governance and Institutions Special Theme:**

Improving domestic resource mobilization: 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) *that increase taxation of multinational companies, capital gains, property and wealth* toward achieving *country-owned tax-GDP targets* ratio of at least 15 percent in the medium term.

BALANCE SHEET OPTIMIZATION

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.**

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 concessionalism as a key added value of IDA.

CONSULTATION WITH CIVIL SOCIETY

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 two times during the replenishment process; and with more opportunity, time, and space for thematic discussions with the Bank's IDA team and thematic leads.

For further questions on comments, please email nadia.daar@oxfam.org

15. Results Canada

Comment:

RECOMMENDATIONS FOR THE IDA 20 POLICY PACKAGE

Thank you for offering an opportunity to provide feedback on the IDA 20 policy package.

D) Quantitative Targets of the Results Measurement System: Less Results for More Money?

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. This problem is pervasive as it affects 6 human capital indicators out of 9, and undermines what should be the pre-eminence of human capital as a special theme of IDA 20:

- 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 increasing 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 “expand 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 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.” The target should cover non-temporary safety nets exclusively.

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).

II) Making Slight Amendments to Existing Policy Commitments

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:

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”

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.

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:

“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 to a coverage rate of 70%, testing, treatment and care, and/or (ii) strengthening pandemic preparedness including prevention, detection and response.”

III) Use of Regional and Private Sector Windows to Fight COVID-19

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.*

IV) Wasting as an additional Tier 1 indicator

We welcome the presence of the “Prevalence of Undernourishment” as a Tier 1 indicator under Crisis Preparedness. *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.*

V) Measuring Inputs

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 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. *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.*

In closing, let us reiterate our thanks for the opportunity to provide our input into this important replenishment. The amounts at stake are high for taxpayers as are the challenges for implementing countries, so ensuring measurable value-for-money is imperative.

Yours truly,

Chris Dendys, Executive Director



16. Results Japan

Comment:

Human Capital Special Theme Policy Commitments

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).[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.
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.
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.](#)
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.
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.](#)
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.

17. Save the Children – Nida Yusuf

Comment:

Save the Children's feedback on the draft IDA20 Deputies' Report – specifically on the World Bank's role as co-lead of the ACT-A Health Systems Connector Pillar.

24th October 2021

Background

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 a result to disruptions to health systems².

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.

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.

ACT- Accelerator

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.

IDA priorities – as per the draft IDA20 Deputies' Report

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.

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.

Health System and Response Connector – Strategy vs Budget

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)

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. Below are some of the HSRC’s objectives and activities lifted from the strategic plan:

Table 1: HSRC activities

Priorities	Activities
1. Support coordinated country planning, financing and tracking against delivery targets	<ul style="list-style-type: none"> • Gain clear understanding of needs and current capacity to meet that demand • Support countries in developing national deployment strategies for COVID-19 tools • Support countries in closing financing gaps, notably by raising awareness on available financing mechanisms and alignment opportunities with other multilateral and bilateral investments in COVID-19 response • Measure "real-time" availability and absorption of tools in countries
2. Support coordinated technical, operational and financial support to countries to ensure translation of tools into effective health interventions	<ul style="list-style-type: none"> • Work with COVAX to address surge staffing and other infrastructure needs (e.g., need to set up ultra cold chain infrastructure) to support effective vaccine deployment, through training and operational support • Work with the Dx pillar to ensure that the expansion of community-based testing programs and other testing approaches are tightly linked to the development and execution of coherent public health interventions, through training, operational support and technical assistance • Work with the Tx and Dx pillars to support countries in delivering more effective “test & treat” strategies, and to optimize clinical care pathways, through technical assistance and operational support
3. Ensure health systems and workforce protection and capacity strengthening	<ul style="list-style-type: none"> • Address cross-cutting bottlenecks to the deployment of tools. This includes health system organization, surge response and vaccination workforce requirements, systems monitoring, basic health infrastructure, political engagement and intra-government coordination as well as working with communities and civil society to tackle demand-side and utilization barriers such as fear and stigma • Minimize knock-on effect of COVID-19 on other essential health services, including reduced access to health facilities; reduced ability to pay for services; reduced staffing available to provide care; disrupted supply chain systems and lack essential medical supplies; and lowered service capacity at health care facilities, displacement of funding • Ensure that health and community care workers are supported to apply appropriate IPC practices, including through access to the necessary personal protective equipment and training, to ensure the safe functioning of health systems and the safe use of COVID-19 tools

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.

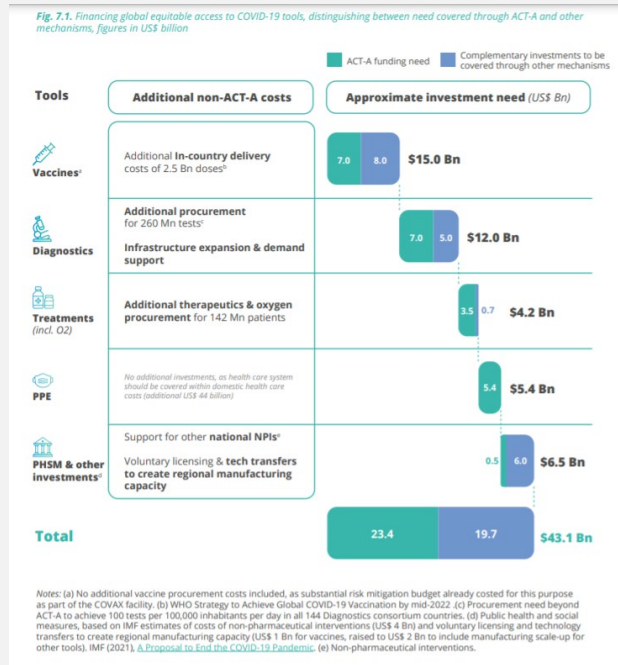
Table 2: HSRC budget breakdown

	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%

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.

Figure 1: Figure 7.1 from the ACT-A strategic plan



According to the strategy, in addition to providing PPE to protect 2.7 million health care workers, the HSRC also aims to:

- Strengthen national response mechanisms
- Overcoming health systems bottlenecks and barriers - including gender barriers
- Maintain other essential health services
- Support integrated service delivery platforms

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.

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.

Some questions to consider whilst finalising the IDA20 Deputies' Report

- 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?

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?

Annex 1: HSRC Budget (ACT-A Strategic Plan)

Health System & Response Connector	
Strategic Priority 1 - Closely track overall gap to access vaccines, tests, treatments & PPE	Millions
Country readiness planning, demand generation and financing	102
Implementation monitoring and tracking against delivery targets	61
Real-time country needs and gaps analysis	41
Other	
Enabling costs - including ACT-A hub running costs	15
	219
Priority 4 - Treat 120 m people & protect 2.7 m HCWs, with scaled delivery of existing & new treatments, incl. O2, and access to PPE	
Procurement to close the gap to global targets: PPE to protect essential frontline health workers	3,379
Procurement to expand coverage & mitigate risks: PPE to protect additional frontline health workers	1,352
	4,731
Strategic Priority 5 - Fully integrate Pillar delivery with COVID-19 national responses (through revamped Health Systems & Response Connector), managing vulnerabilities, financing, risks & health systems interface	
Procurement to close the gap to global targets	
Protecting the health work force	200
Bottlenecks management and TA for interdependency with essential health services	118
Working with the Therapeutics and Diagnostics Pillars to support countries in delivering more effective "test & treat" strategies, and to optimise clinical care to save more lives	86
Working with the Diagnostics Pillar to help countries use tests to implement effective public health measures	71
Procurement to expand coverage & mitigate risks	
Protecting the health work force	80
Bottlenecks management and TA for interdependency with essential health services	47
Working with the Therapeutics and Diagnostics Pillars to support countries in delivering more effective "test & treat" strategies, and to optimise clinical care to save more lives	34
Working with the Diagnostics Pillar to help countries use tests to implement effective public health measures	29
Agency technical assistance & delivery support	
Management cost associated with procurement of Therapeutics, Diagnostics and PPE	282
	947
Total	5,897

18. Save the Children – Richard Watts

Comment:

Save the Children’s comments on the draft public IDA20 Deputies’ report

Save the Children welcomes the opportunity to provide feedback on the Draft IDA20 Deputies’ report. This submission sets out Save the Children’s comments framed around a selection of the special themes and cross cutting issues in the draft.

Human capital special theme

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.

Health

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.

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.

Education

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.

Nutrition

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 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.

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.

Climate change special theme

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.

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.

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.

Fragility, Conflict and Violence special theme

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.

Crisis preparedness cross cutting issue

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.

Governance and intuitions cross cutting issue

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.

19. Sightsavers

Comment:

Sightsavers' comments on the draft IDA Deputies report

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 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.

Comments and suggested changes

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.

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.

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.'

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 *Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups*.

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.

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 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**.

Human capital commitment 5

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.

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.

Gender and Development

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.

The Special Theme would be strengthened if this was explicitly recognised. The recent data collected on disability through the *‘Women, Business and the Law’* report could be used to measure progress on disability and gender as part of this Special Theme.

Results Measurement System

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.

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.

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.

For more information about any of the comments provided please contact Hannah Loryman, Head of Policy, hloryman@sightsavers.org

20. Unicef

Comment:

25 November 2021

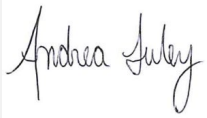
Dear colleagues,

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.

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.

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.

Sincerely,



Andrea Suley Senior Advisor
UNICEF Public Partnership Division Washington DC

IDA SPECIAL THEME: FRAGILITY, CONFLICT AND VIOLENCE

Areas of Support

- 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.

Suggestions

- 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 *Pathways for Peace* 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 – 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**.
- 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): *“114. Participants supported IDA20 simultaneous focus on addressing drivers of FCV and COVID-19 crisis response and recovery priorities...”* **[add:] IDA support will also include attention to the burden of poor mental health and psychosocial needs on people, communities, and institutions in IDA FCS.**

IDA SPECIAL THEME: HUMAN CAPITAL

Areas of Support

- 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. UNICEF is prepared to work with IDA to build and strengthen social protection and humanitarian cash transfers in fragile and emergency contexts.
- 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).

Suggestions

- 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.
 - 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:**
 - **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.
- 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.

IDA SPECIAL THEME: GENDER AND DEVELOPMENT

Suggestions

- 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.
- 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.
- 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.
- **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](#))
- **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.

IDA SPECIAL THEME: CLIMATE CHANGE

Suggestion

- Suggest including references to “environmental degradation” and linking its impacts to climate change throughout the section.

IDA CROSS CUTTING ISSUES: DEBT

Areas of Support

- 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.

Suggestion

- 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.

IDA CROSS CUTTING ISSUES: GOVERNANCE AND INSTITUTIONS

Suggestion

- UNICEF suggests including an emphasis on budget transparency to complement the report’s focus on debt transparency.

21. Wemos

Comment:

Comments to the Draft IDA20 Deputies’ report from a health equity viewpoint

IDA20 Public commentary window

Wemos, 26 November 2021

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.

positive remarks

1. 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.
2. 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.

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.

CONCERNS and suggestions

1. 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.

- ⇒ 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.
2. 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).

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.

- ⇒ 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.

22. WHO

Comment:

Dear All,

In addition to the video that Dr Tedros contributed to the advocacy for IDA 20 launching last march (<https://we.tl/t-sSWcOw6Rvy>), we are pleased to add contributions from some of our Health technical units – including Universal Health Coverage and its components at national level, Mental Health and AMR -, who perused the draft-IDA20-deputies-report-for-public-comment.pdf (worldbank.org) (<https://thedocs.worldbank.org/en/doc/a379b54b77db699b48d4dfa02ce504b8-0410012021/original/draft-IDA20-deputies-report-for-public-comment.pdf>) - and reflected some comments – as below and attached.

[Comments to Executive Summary](#)

[Comments to Main Text](#)

Health is an investment in human capital, which can be considered in a more holistic and sustainable manner. Apart from the two major actions (namely, to contain COVID-19 pandemic and to strengthen pandemic preparedness as proposed at paragraph xii.a), resilient health systems strengthening based on primary health care are crucial and need to be sustainably financed at all levels, so as to contribute to the green, resilient and inclusive development. It was well highlighted in the G20 Joint Finance and Health Ministers Communiqué (29 October 2021) to promote a healthy and sustainable recovery through the strengthening of national health systems, making them more inclusive and resilient, ensuring universal access to health care services, including sexual and reproductive health, in line with SDGs, and focusing on primary health care to achieve quality health care at all levels and achieve Universal Health Coverage (UHC).

More coordination and collaboration need to be made to promote alignment of global health-related replenishment and financing strategies and their measurement. It is well noted in the document the challenges such as fragmentation of aid flows and proliferation of donor entities, enhanced donor coordination at both global and national levels is critical to optimize their comparative advantages and complementarities. Considering the possible extension of WHO GPW13 (to 2025), more alignment and complementarities between IDA20 and WHO GPW13 can be further explored, in terms

of joint programmes, M&E indicators sharing with reference to SDGs, in area of Human Capital, Climate Change, Gender and Development etc.

WHO stresses the importance for more attention to Mental Health and Psychosocial Support (MHPSS), including in peace building. In particular, WHO strongly support the suggested text in **yellow**

* “114. Participants supported IDA20 simultaneous focus on addressing drivers of FCV and COVID-19 crisis response and recovery priorities. [...]”

[add:] IDA support will also include attention to the burden of poor mental health and psychosocial needs on people, communities, and institutions in IDA FCS.

The AMR inputs are detailed below:

Executive Summary:

PDF page 11 - Included reference to AMR as a growing risk in point (viii) – strengthening approaches to crisis preparedness for deeper resilience. (Thought good to have AMR reference in Exe Summary as AMR is a flagship programme in GPW13.)

Summary Conclusion & recommendations:

PDF page 13 – HUMAN CAPITAL section.- inserted references in points (a), (c),

PDF Page 14 – points (g) – health security

Main Sections:

PDF page 25 – included reference – in point (7) - Pandemic has triggered a health crisis – thought useful to note impact on AMR efforts..

PDF page 27 – included reference in point (12) – impact of pandemic on progress in health outcomes.

PDF page 48 – Box on food security – included reference to AMR

PDF page 52 – included reference in point (56) – made reference to AMR in the “One Health approach”

PDF page 66 – included reference in point (85) – aligned with strengthening health systems

PDF page 67 – included reference in point (87) – included AMR - aligned with global health security and One Health approach.

Thanks

Amin

M. Amin Kébé – PMP ©

Portfolio Manager

International Financial Institutions (IFIs)

External Relations and Governance

WHO – Geneva