**Feedback on Guidance for ESS10 Stakeholder Engagement and Information Disclosure**

1. Though the guidance does cover the required areas, there are gaps which need to be addressed to ensure that in reality, the rights of the various stakeholders are upheld.
2. The guidance seems monotonous, and does not reflect the circumstances of the countries and stakeholders in mind. Although the section on Information Disclosure and Meaningful Consultation attempts to ensure that there is genuine communication, the following questions arise:-
   1. Would the different stakeholder groups have the appropriate knowledge, background and circumstances to genuinely expect equitable treatment?
   2. What measures would there be to measure and manage the conflict of demands?
3. A particular concern is the following clause:-

***GN22.1.*** *The aim of consultations is to inform the Borrower’s decisions, where appropriate.* ***Not all stakeholder groups can agree on impacts and mitigation, so the goal of the engagement is not always to achieve consensus, but to hear from stakeholder groups and to take their comments and concerns into account in making project decisions.*** *Security and accessibility are expected to be considered when designing a consultation program, especially in fragile and conflict situations*

This seems to provide a simple basis for Borrowers to be able to manipulate the circumstances to their advantage. What would be the ranking and priority of stakeholder demands? How do we ensure that this process is transparent and free of corruption? What would be the check and balance mechanism in place?

1. The grievance mechanism at its best, sounds vague and likewise, puts the onus on the borrowers. What are the types of legal assistance that could be provided to the stakeholders, especially those from restricted backgrounds of limited resources and knowledge?
2. Though this is purely a guide and is not mandatory, the World Bank could play a more crucial role to achieve sustainability and transparency. Policies and guidelines look good on paper, but is more important is the actual application to develop a culture to foster a transparent process. The overall guide would probably be sufficient for the initial feasibility study and approval of the project, but what happens afterwards? Where are the KPI’s and monitoring systems? What happens if the Borrower does not comply with the expectations?
3. In its attempt to be seen as flexible and to deviate from the “one size fits all” concept, the guide refers to country level legislation and codes. Has there been a comparison of the laws of the country with the international best practices? How do we ensure that once again, it is fairly distributed amongst the borrowers and how best can these laws protect the rights of the stakeholders?
4. To conclude, I would strongly urge the World Bank to revamp its policies in such a manner that we move past the need to have long-winded, lengthy guidelines and codes and focus more on realistic practices that positively impacts world sustainability. Good governance does not promote voice and accountability, as is apparent with many of the concepts of the World Governance Indicators and even with the comparison with E-Government and E-Participation Indexes. Until we truly embrace this gap, good governance, transparent proceedings and equitable rights would only remain a dream.