

## Table 1: Comparison of E&S Safeguard Policies among the Development Partners

**Purpose:** IA review of PRIF partners safeguard policies and requirements across the preparation and implementation stages of an infrastructure project lifecycle is made and presented in Table 1. The purpose of this table is to illustrate the differences across PRIF partners safeguard policies and requirements. This is important for two reasons: first to gain an understanding of the depth of treatment and coverage for safeguards by individual PRIF development partner; and secondly it helps PRIF partners to understand their differences and how this may be addressed when considering (negotiating for) the Shared Approach for a future project.

**Summary:** The comparison indicates that the World Bank has the most comprehensive explicit policies and up-to-date frameworks<sup>1</sup>. While ADB also has well-established explicit policies, they are rather dated<sup>2</sup>, with many in the process of review and the current ESS and procedures are not as readily accessible with many referencing WB standards and procedures. JICA too has some explicit policies but like Australia, Japan has also endorsed the use of WB ESS to either address gaps in their own project systems or defer to more complex projects. The international environment policies for the donor partners ADFAT, EIB, EU, NZFMAT, and US are more implicit than the WB and ADB. In addition to the key ESS covered by WB, US, EU, EIB, Japan, New Zealand and Australia all also emphasize the importance of gender equality and vulnerable peoples. New Zealand has development policies regarding Gender-Based violence, which align with WB tools. Additional focal areas of particular relevance to the remote PICs is the EU and US policy focus on digital or cyber access issues which could help support better connectivity for PICs. The EU and US also both promote and protection of human rights, democracy, and the rule of law; EU stating Human rights and democracy are inextricably connected. Given the other PRIF partners often refer to WB procedures and standards, this study compares the policies against the WB's akin to considering it as a *benchmark*. Table 1 presents the comparison and highlighted alignments or outliers with the other PRIF development partners.

Table 1 PRIF Partner Key Environmental and Social Safeguard Policies comparison

World Bank (WB)	ADB	ADFAT	EIB	EU	JICA	NZMFAT	US
<a href="#">Environmental and Social Standard 1<sup>3</sup></a> <b>Assessment and Management of Risks and Impacts</b> using <a href="#">Environmental and Social Framework</a> ESF includes 10 ESS and refers to	<a href="#">Safeguard Policy Statement<sup>4</sup> (SPS)</a> Is over a decade old and currently being reviewed by ADB The SPS policies seek to avoid, minimize, or mitigate adverse	Environment Protection Principle 2: Assess and manage environmental risks and impacts <sup>5</sup>  Early identification of environmental and social risks and impacts during the planning stage of investments and their continued management through the life of investments.	1 –Environmental and Social Impacts and Risks  The EIB's environmental and social safeguard policies are based on the EU approach to environmental sustainability. The principles, practices and		Using a similar system to ADB it classifies projects into four categories- A B C D and FI-- based on the extent of environmental	New Zealand's engagement in the Pacific is guided by the principles of understanding, friendship, mutual benefit, collective impact and sustainability.	The Office of Environmental and Social Risk Management (ESRM) works to avoid adverse environmental and social impacts of projects

<sup>1</sup> <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>

<sup>2</sup> <https://www.adb.org/sites/default/files/institutional-document/32056/safeguard-policy-statement-june2009.pdf>

<sup>3</sup> <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>

<sup>4</sup> <https://www.adb.org/sites/default/files/institutional-document/32056/safeguard-policy-statement-june2009.pdf>

<sup>5</sup> <https://www.dfat.gov.au/sites/default/files/principle-2-assess-and-manage-environmental-risks-and-impacts.pdf>

World Bank (WB)	ADB	ADFAT	EIB	EU	JICA	NZMFAT	US
<p>WB Environmental and Social Policy for Investment Project Financing Bank Directive Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups Environmental and Social Procedure World Bank Access to Information Policy</p> <p><b>Requires</b></p> <p>A. Use of borrower’s environmental and social framework (ie country’s systems)</p> <p>B. Environmental and social assessment</p> <p>C. Project monitoring and reporting</p> <p>E. Stakeholder engagement and information disclosure</p>	<p>environmental and social impacts, including protecting the rights of those likely to be affected or marginalized by the development process. Broadly it classifies projects into four categories- A B C D and FI-- based on the extent of environmental and social impacts, taking into account the project’s characteristics, scale, and site conditions</p>	<p>Environmental and Social Safeguard Policy (safeguard policy)<sup>6</sup></p> <p>Environment Protection Policy<sup>7</sup> supports the efforts of development partners to harmonize their safeguards</p> <p>Work effectively with partners; Promote improved environmental and social outcomes. Explicitly states WB ESS (or IFC) be applied for large or complex projects</p>	<p>standards are highlighted in the Declaration on the European Principles for the Environment (EPE).<sup>8</sup> The Bank operates within the framework of the EPE, which conforms to the environmental principles and the practices of the EC Treaty and all standards of EU environmental legislation.</p>		<p>and social impacts, taking into account the project’s characteristics, scale, and site conditions</p>	<p>Effective development is values driven, partnership focused, adaptive, outcomes-focused, and evidence-based.</p> <p>Environmental and Social Impacts Guideline 2015 ESIA<sup>9</sup></p>	<p>supported by USAID. Works to mitigate harm and make projects more time- and cost-effective</p> <p><a href="#">Social Vision, Strategies &amp; Policies</a><sup>10</sup></p>

World Bank	ADB	ADFAT	EIB	EU	JICA	NZMFAT	US
<p><a href="#">Environmental and Social Standard 2 Labor and Working Conditions</a></p>	<p>Labor and Working Conditions (LWC)</p> <p><a href="#">Safeguard Policy Statement</a></p>	<p>Explicitly states WB ESS be applied for large or complex projects</p>	<p>Labor Rights (ESS 8)</p> <p>The Bank applies stringent</p>	<p><b>Sustainable Growth and jobs-</b> Employment, decent work, and investment are at</p>	<p>Environmental management entails the maintenance of a healthy balance between human</p>	<p>Well developed policy on preventing Sexual Exploitation</p>	<p>Human rights and democracy</p> <p>Improving social aspects of an intervention and</p>

<sup>6</sup> <https://www.dfat.gov.au/sites/default/files/environmental-and-social-safeguard-operational-procedures.docx>

<sup>7</sup> <https://www.dfat.gov.au/sites/default/files/environment-protection-policy-aid-program.pdf>

<sup>8</sup> <https://www.eib.org/en/publications/european-principles-for-the-environment>

<sup>9</sup> <https://www.mfat.govt.nz/assets/Aid-Prog-docs/Tools-and-guides/Environment-Guideline.pdf>

<sup>10</sup> <https://www.usaid.gov/environmental-procedures/laws-regulations-policies/social-vision-strategies-policies>

<p><b><u>Environmental and Social Framework Requirements</u></b>  A. Working conditions and management of worker relationships  B. Protecting the work force  C. Grievance mechanism  D. Occupational Health and Safety (OHS)  E. Contracted Workers  F. Community Workers  G. Primary supply workers</p>	<p><b><u>Social Protection Strategy (2001)</u></b>   Lack of clarity due to no consolidated standard LWC provisions scattered over multiple documents —CLS Handbook, Handbook on Poverty and Analysis, etc.</p>		<p>requirements with regard to dam projects’ justification and design, the EIA process, the social and environmental safeguards, the preparation of mitigating measures, and the management capacities of the project promoter. It recommends that promoters of large dam projects are guided by:  • the recommendations of the 2000 WCD Report “Dams and Development – A New Framework for Decision-Making” and  • the findings of the 2003 Camdessus Report on “Financing Water for All” on the financing of large dams;</p>	<p>the core of sustainable growth.</p>	<p>economic and social systems and the environment to ensure the realization of sustainable development in a society</p>	<p>Abuse and Harassment (PSEAH) which outlines the expectations and requirements to manage the risk of sexual exploitation, abuse, and harassment in external assistance projects/ programs.</p>	<p>strengthening social safeguards policies.   US Department of State <a href="#">Policy Issues</a>  Including Economic Anti-corruption and Transparency   Prosperity and Trade Policy   Global Health   Global Women’s Issues   Human Rights and Democracy   Human Trafficking   Refugee and Humanitarian Assistance   Treaties and International Agreements   <a href="#">Social Vision, Strategies &amp; Policies</a>  Human Rights  Health and Safety</p>
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World Bank	ADB	ADFAT	EIB	EU	JICA	NZMFAT	US
<p><a href="#">Environmental and Social Standard 3</a>   <b>Resource Efficiency and Pollution</b></p>	<p><a href="#">Safeguard Policy Statement</a>   <b>Resource Efficiency and Pollution</b></p>	<p>Climate change action   Explicitly states WB ESS be applied for large</p>	<p>Resource Efficiency and Pollution Prevention (ESS 3) and Climate Change (ESS 5)  EIB projects are assessed for their expected impacts in terms of greenhouse gas</p>	<p><b>Climate, environment, and energy-</b> encompassing biodiversity, climate change, water, and food systems.</p>	<p>Due attention to climate change   Environmental management entails the maintenance of a healthy balance</p>	<p>Includes impacts of climate change, natural disasters and external shocks as well as promoting the protection and</p>	<p>Improving the environmental aspects of interventions and environmental safeguards policies</p>

<p><b>Prevention and Management</b></p> <p><a href="#">Environmental and Social Framework Requirements</a></p> <p>Resource efficiency</p> <p>A. Energy use</p> <p>B. Water use</p> <p>C. Raw material use</p> <p>Pollution prevention and management</p> <p>A. Management of air pollution</p> <p>B. Management of hazardous and nonhazardous wastes</p> <p>C. Management of chemicals and hazardous materials</p> <p>D. Management of pesticides</p>	<p><b>Prevention and Management Requirements</b></p> <p>1. Pollution Prevention, Resource Conservation, and Energy Efficiency</p> <p>2. Wastes</p> <p>3. Hazardous Materials – chain of custody, consideration of limitations of transboundary movement under applicable international conventions</p> <p>4. Pesticides Use and Management</p> <p>5. GHG Emissions</p> <p>Water use and water balance</p>	<p>or complex projects</p>	<p>emissions; the scope for improvements in energy efficiency and the need for measures to adapt to climate change are also reviewed.</p> <p>Guided by recognised international practices including the Extractive Industries Review (EIR) and</p> <p>All projects financed by EIB should comply with the requirements of relevant multilateral environmental agreements (MEA) to which the host country – and/or the EU in the case of a EU Member State – is a party, including the Montreal Protocol (on ozone depleting substances), the UN Convention on Climate Change and the Kyoto Protocol (on greenhouse gas emissions) and the Aarhus Convention (on environmental information).</p>		<p>between human economic and social systems and the environment to ensure the realization of sustainable development in a society potential co-benefits to climate change approach</p>	<p>enhancement of ecosystems.</p> <p>Climate Change Policy<sup>11</sup></p>	<p>US Department of State</p> <p><a href="#">Policy Issues</a></p> <p>Including Climate and Environment</p> <p>Climate Crisis</p> <p>Energy</p> <p>The Ocean and Polar Affairs</p> <p>Treaties and International Agreements</p>
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World Bank	ADB	ADFAT	EIB	EU	JICA	NZMFAT	US
<p><a href="#">Environmental and Social Standard 4</a></p> <p><b>Community Health and Safety</b></p> <p><a href="#">Environmental and Social Framework</a></p>	<p><b>Community and occupational health and safety</b></p> <p><a href="#">Social Protection Strategy (2001)</a><sup>12</sup></p>	<p>Health and safety.</p> <p>Explicitly states WB ESS be applied for large or complex projects</p> <p>Has additional policy focus on</p>	<p>Health, Safety, and Security (ESS 9)</p>	<p>ACP-EU agreement seeks ...peace and security<sup>14</sup></p>	<p>Environmental management entails the maintenance of a healthy balance between human economic and social systems and the environment to ensure</p>	<p>Implicit policies</p>	<p>Health and Safety</p> <p><a href="#">Social Vision, Strategies &amp; Policies</a></p> <p>US Department of State</p>

<sup>11</sup> <https://environment.govt.nz/publications/statement-of-intent-2008-2011/operating-intentions/climate-change/>

<sup>12</sup> <https://www.adb.org/documents/social-protection-strategy>

<sup>14</sup> [https://international-partnerships.ec.europa.eu/policies/european-development-policy/ACP-EU-partnership\\_en](https://international-partnerships.ec.europa.eu/policies/european-development-policy/ACP-EU-partnership_en)

World Bank	ADB	ADFAT	EIB	EU	JICA	NZMFAT	US
<p><b>Requirements</b> A. Community Health and Safety B. Security personnel</p> <p><b>Gaps -</b> While SEAH comes under ESS 7, due to the extent of impacts projects can cause on small island communities it is recommend greater incorporation of Sexual Exploitation Abuse and Harassment (SEAH) into community health and safety</p>	<p><a href="#">Review findings</a><sup>13</sup> High-level principles and requirements, quite generic, lack details in many areas. • Sexual Exploitation Abuse and Harassment (SEAH): Worker-to-Worker SEAH risks • Silent on Linkages to LWCs • Doesn't specify at which stage(s) of the project cycle Borrower/Client requirements should be in place. • Silent on expertise and level of Risk Assessment and Management Planning required to be undertaken for both generic and sector specific. • Silent on OHS risks associated with operations, decommissioning, transport of goods and services. • Silent on Worker Responsibilities towards management of OHS risks at the worksite. • Silent on the implementation of the OHS provisions</p>	<p>Children, vulnerable and disadvantaged groups gender equality, disability-inclusive development, humanitarian assistance, child protection, sexual exploitation abuse, and sexual harassment</p>			<p>the realization of sustainable development</p>		<p><a href="#">Policy Issues</a>  Including Global Health  Global Women's Issues  Human Rights and Democracy</p>

<sup>13</sup> [ADB Safeguard Policy Review and Update: Community and Occupational Health and Safety https://events.development.asia/learning-events/community-and-occupational-health-and-safety](https://events.development.asia/learning-events/community-and-occupational-health-and-safety)

World Bank	ADB	ADFAT	EIB	EU	JICA	NZMFAT	US
	throughout project cycle • Does not provide linkage to prevention of pollution risks to human health and environment						

World Bank	ADB	ADFAT	EIB	EU	JICA	NZMFAT	US
<a href="#">Environmental and Social Standard 5</a>  <b>Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement</b>  <a href="#">Environmental and Social Framework</a>	<a href="#">Involuntary Resettlement</a> <sup>15</sup>  <a href="#">Involuntary Resettlement Policy (1995)</a> <sup>16</sup>	Displacement and resettlement. Explicitly states WB ESS be applied for large or complex projects	Involuntary Resettlement (ESS 6)	Implicit Policies	Promotes the use of WBG ESF particularly Resettlement Action Plan (RAP) to include WBG (ESS) 5	Implicit Policies  Inclusion promoting human rights and equitable participation in the benefits of development and addressing exclusion and inequality created across all social dimensions of identity. Sustained benefits centered on the development/nurturing of more accountable institutions <sup>17</sup> .	Human Rights Involuntary Resettlement Regulation 216 <a href="#">Social Vision, Strategies &amp; Policies</a>  US Department of State <a href="#">Policy Issues</a>  Including Economic Anti-corruption and Transparency  Prosperity and Trade Policy  Global Health  Global Women's Issues  Human Rights and Democracy  Human Trafficking

<sup>15</sup> <https://www.adb.org/who-we-are/safeguards/involuntary-resettlement>

<sup>16</sup> <https://www.adb.org/documents/policy-involuntary-resettlement>

<sup>17</sup> [ICESD Development Principles Overview \(mfat.govt.nz\)](#)

World Bank	ADB	ADFAT	EIB	EU	JICA	NZMFAT	US
							Refugee and Humanitarian Assistance  Treaties and International Agreements

World Bank	ADB	ADFAT	EIB	EU	JICA	NZMFAT	US
<p><a href="#">Environmental and Social Standard 6<sup>18</sup></a></p> <p><b>Biodiversity Conservation and Sustainable Management of Living Natural Resources</b></p> <p><a href="#">Environmental and Social Framework</a></p> <p>The environmental and social assessment as set out in ESS1 will consider direct, indirect and cumulative project-related impacts on habitats and the biodiversity they support</p> <p>Environmental and Social Procedure, setting out Management approved mandatory environmental and social</p>	<p><a href="#">Environment Safeguards</a></p> <p><a href="#">Safeguard Policy Statement</a></p> <p>Biodiversity Assessment</p> <p>Main requirements:</p> <ul style="list-style-type: none"> <li>Assess significance of project impacts on biodiversity and natural resources.</li> <li>Identify measures to:               <ol style="list-style-type: none"> <li>avoid, minimize, or mitigate adverse impacts and, as a last resort, propose compensatory measures/biodiversity offsets, to...</li> <li>achieve no net loss or a net gain of the affected biodiversity.</li> </ol> </li> <li>Identify Modified, Natural, Critical Habitat and Legally Protected Areas and apply policy as appropriate (see next slide)</li> <li>Invasive Alien Species</li> <li>Sustainable management of renewable natural resources</li> </ul> <p>Biodiversity Action Planning (BAPs): Not a direct SPS requirement and so the</p>	<p>Environmental protection.</p> <p>Explicitly states WB ESS be applied for large or complex projects</p>	<p>sustainable development</p> <p>Biodiversity &amp; Ecosystems (ESS 4)</p>	<p><b>Climate, environment, and energy-</b> encompassing biodiversity, climate change, water, and food systems.</p>	<p>Sustainability... with due attention to the environment</p> <p>Environmental management entails the maintenance of a healthy balance between human economic and social systems and the environment to ensure the realization of sustainable development</p>	<p>Implicit Policies</p>	<p>Improving the environmental aspects of interventions and environmental safeguards policies</p> <p><a href="#">Foreign Assistance Act 1961<sup>22</sup></a></p> <p>FAA 117 Environment and Natural Resources</p> <p>FAA 118 Tropical Forests</p> <p>FAA 119 Endangered Species</p> <p>US Department of State <a href="#">Policy Issues<sup>23</sup></a></p> <p>Including Climate and Environment Climate Crisis Energy The Ocean and Polar Affairs Treaties and International Agreements</p>

<sup>18</sup> <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>

<sup>22</sup> <https://www.usaid.gov/environmental-procedures/laws-regulations-policies/faa>

<sup>23</sup> <https://www.state.gov/policy-issues/>

procedures <sup>19</sup>	development of BAPs is variable and requirements for offsetting are limited <sup>20</sup> ADB has significant gaps in SPS compared to WB <sup>21</sup>						
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World Bank	ADB	ADFAT	EIB	EU	JICA	NZMFAT	US
<p><a href="#">Environmental and Social Standard 7</a></p> <p><b>Indigenous Peoples /</b> *(Sub-Saharan African Historically Underserved Traditional Local Communities.)</p> <p><a href="#">Environmental and Social Framework</a></p>	<p><a href="#">Indigenous Peoples Safeguard Policy Statement</a></p> <p><a href="#">Indigenous peoples planning documents</a></p> <p><a href="#">Policy on Indigenous Peoples (1998)</a></p> <p><a href="#">ADB current approach<sup>24</sup></a></p> <p>Requires social groups to also be 'vulnerable'. ADB the policy refers only to IP based on identification criteria; some scope of IP safeguard to include other vulnerable groups.</p>	<p><b>Indigenous peoples.</b></p> <p>Explicitly states WB ESS be applied for large or complex projects</p>	<p>Inclusive development</p> <p>7- Indigenous Peoples, Gender, and Vulnerable</p>	<p>Human Development -- Health, education, and a decent standard of living are considered to be the key elements to ensuring human development</p> <p>Youth – youth participation is central to the EU's values and policies.</p> <p>Gender Equality-- Achieving gender equality and empowering women and girls is vital to building fair, inclusive, prosperous, and peaceful societies everywhere.</p>	<p>Promotes the use of WBG ESF Indigenous People Plan (IPP) to include use of WBG ESS 7</p> <p>Reducing disparities and socially vulnerable sections, inclusion of socially vulnerable local residents</p>	<p>Inclusion promoting human rights and equitable participation in the benefits of development and addressing exclusion and inequality created across all social dimensions of identity</p>	<p>Committed to development that is inclusive of disadvantaged groups and to human rights</p> <p><a href="#">Social Vision, Strategies &amp; Policies</a></p> <p>Human Rights Involuntary Resettlement Regulation 216</p> <p><a href="#">USAID Strategy on Democracy Human Rights and Governance 2013</a></p> <p>US Department of State <a href="#">Policy Issues</a></p> <p>Including Economic Anti-corruption and Transparency Prosperity and Trade Policy Global Health Global Women's Issues Human Rights and Democracy Human Trafficking Refugee and Humanitarian Assistance</p> <p>Treaties and International Agreements</p>
World Bank	ADB	ADFAT	EIB	EU	JICA	NZMFAT	US

<sup>19</sup> Consideration of alternatives and ensuring proper analysis is conducted and the mitigation hierarchy is followed

<sup>20</sup> [ADB Safeguard Policy Review and Update: Biodiversity and Sustainable Natural Resource Management https://events.development.asia/node/45421](#)

<sup>21</sup> [ADB Safeguard Policy Review and Update: Biodiversity and Sustainable Natural Resource Management](#)

<sup>24</sup> ADB SPS Indigenous Peoples review findings regional presentation <https://events.development.asia/learning-events/indigenous-peoples>



<p><a href="#">Environmental and Social Standard 8</a></p> <p><b>Cultural Heritage</b></p> <p><a href="#">Environmental and Social Framework</a></p> <p><b>Including</b></p> <p>B. Stakeholder consultation and identification of cultural heritage</p> <p>C. Legally protected cultural heritage areas</p> <p>D. Provisions for specific types of cultural heritage</p> <p>E. Commercial use of cultural heritage</p>	<p><b>Cultural Heritage Safeguard Policy Statement</b></p> <p>Identify measures to conserve and avoid damage or destruction of physical cultural resources (PCR), Highlights the importance of consultation, both with local communities and relevant national or local regulatory agencies.</p> <p><a href="#">ADB Policy review gaps</a><sup>25</sup></p> <p>Lack of definition on categories for tangible cultural heritage.</p> <p>No explicit reference to Indigenous people’s cultural heritage in SPS IP safeguards.</p> <p>Intangible cultural heritage is only addressed with respect to its commercial use, with insufficient guidance.</p> <p>Lack of requirements to use consultation as a means of identifying cultural heritage.</p> <p>Does not explicitly address user access to cultural heritage sites</p>	<p>Explicitly states WB ESS be applied for large or complex projects</p>	<p>Cultural Heritage ESS 10</p> <p>inclusive development</p> <p>7- Indigenous Peoples, Gender, and Vulnerable</p>	<p>Implicit and relies on EIB</p>	<p>Reducing disparities and socially vulnerable sections, inclusion of socially vulnerable local residents</p> <p>Environmental management entails the maintenance of a healthy balance between human economic and social systems and the environment to ensure the realization of sustainable development</p>	<p>Implicit Policies</p>	<p>Although the State Department has engaged for many years in cultural heritage and property issues, it does not appear to have it integrated into broader foreign policy framework<sup>26</sup></p> <p>The <a href="#">USAID Strategy on Democracy Human Rights and Governance 2013</a> and <a href="#">Joint Strategic Plan FY 2022-2026</a> are both silent on cultural heritage</p>
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World Bank	ADB	ADFAT	EIB	EU	JICA	NZMFAT	US
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<sup>25</sup> <https://events.development.asia/materials/20220110/adb-safeguard-policy-review-and-update-cultural-heritage>

<sup>26</sup> [Schwartz L. US Diplomatic Engagement and Cultural Heritage Protection. American Diplomacy 2018 https://americandiplomacy.web.unc.edu/2018/11/u-s-diplomatic-engagement-and-cultural-heritage-protection/](https://americandiplomacy.web.unc.edu/2018/11/u-s-diplomatic-engagement-and-cultural-heritage-protection/)



<p><a href="#">World Bank Access to Information Policy</a>, commitment to transparency, accountability and good governance</p>				<p><b>Gender Equality-</b> - Achieving gender equality and empowering women and girls is vital to building fair, inclusive, prosperous, and peaceful societies everywhere.</p>	<p>Reducing disparities and socially vulnerable sections, inclusion of socially vulnerable local residents</p>	<p>Values-based and transparent approach to engagement<sup>32</sup></p>	<p>US Department of State <a href="#">Policy Issues</a><sup>35</sup> Including Economic Anti-corruption and Transparency Combating Drugs and Crime Cyber Issues Global Women's Issues</p>
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\*Not directly relevant to the PRIF SA due to the geography of the region not including African nations.

<sup>32</sup> <https://www.mfat.govt.nz/assets/Aid-Prog-docs/Policy/Policy-Statement-New-Zealands-International-Cooperation-for-Effective-Sustainable-Development-ICESD.pdf>

<sup>35</sup> <https://www.state.gov/policy-issues/>