

Written Submission on Asian Development Bank's (ADB) September 2023 Draft Environmental and Social Framework (ESF)

Submission from Diabetes Fiji, Inc.
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Suggested Feedback Form on ADB's Draft Environmental and Social Framework

This form is provided for you to prepare your feedback on draft ADB Environmental and Social Framework, including the 10 Environmental and Social Standards. Please select which section you wish to comment on and write your comments in the space provided. If you have questions, please email safeguardsupdate@adb.org.

Overview / General Comments

The Draft Environmental and Social Framework (ESF) is a critical document that outlines the principles, policies, and procedures for managing environmental and social risks and impacts associated with development projects. It serves as a guide for project developers, investors, governments, and other stakeholders to ensure that projects are designed, implemented, and monitored in a manner that minimizes harm to the environment and communities while maximizing social benefits.

Here are some general comments and considerations regarding a Draft Environmental and Social Framework:

Comprehensiveness: The framework should cover a wide range of environmental and social issues relevant to the project context. It should address potential impacts on biodiversity, air and water quality, land use, indigenous peoples, vulnerable populations, cultural heritage, and more.

Risk Assessment: The framework should include a robust process for identifying, assessing, and managing environmental and social risks associated with the project. This involves conducting thorough impact assessments and stakeholder consultations to understand potential consequences and develop mitigation measures.

Legal Compliance: Ensure that the framework aligns with relevant national and international laws, regulations, and standards pertaining to environmental protection, human rights, labor practices, and community engagement. Compliance with legal requirements is crucial for project legitimacy and accountability.

Stakeholder Engagement: Meaningful engagement with affected communities, indigenous peoples, NGOs, and other stakeholders is essential throughout the project lifecycle. The framework should outline mechanisms for consultation, participation, and grievance redressal to foster transparency, trust, and social license to operate.

Capacity Building: Consider incorporating provisions for capacity building and skills transfer to enhance the ability of local communities and institutions to participate in project decision-making, implementation, and monitoring. Empowering local stakeholders strengthens resilience and sustainability.

Monitoring and Evaluation: Establish clear indicators and protocols for monitoring project impacts on the environment and society. Regular evaluation helps track progress, identify emerging issues, and adapt strategies accordingly to ensure continuous improvement and accountability.

Adaptability and Flexibility: Recognize that each project context is unique, and the framework should allow for flexibility to accommodate varying environmental and social conditions, risks, and stakeholder priorities. Regular reviews and updates are necessary to reflect evolving standards and best practices.

Transparency and Reporting: Ensure transparency in all aspects of project planning, implementation, and outcomes. Regular reporting on environmental and social performance, including disclosure of relevant data and information, promotes accountability and enables stakeholders to assess project impacts.

Integration with Financial Decision-making: Integrate environmental and social considerations into financial decision-making processes to ensure that investments align with sustainability goals and avoid negative externalities. This requires collaboration between environmental, social, and financial experts.

Continuous Improvement: Treat the framework as a living document that evolves in response to lessons learned, feedback from stakeholders, and changing socio-environmental contexts. Encourage a culture of continuous improvement and innovation to enhance project effectiveness and sustainability over time.

Overall, the Draft Environmental and Social Framework serves as a crucial tool for promoting sustainable development by ensuring that projects are implemented in a socially inclusive and environmentally responsible manner. It represents a commitment to balancing economic growth with environmental protection and social equity, thereby contributing to long-term prosperity and well-being for present and future generations.

Draft Environmental and Social Policy – [View document](#)

The Draft Environmental Social Policy for the Asian Development Bank (ADB) outlines the institution's commitment to promoting sustainable development by integrating environmental and social considerations into its operations. The policy emphasizes the importance of safeguarding natural resources, mitigating environmental and social risks, and promoting inclusive and equitable development. Key components of the policy include requirements for environmental and social assessments, stakeholder engagement, monitoring and evaluation, and capacity building. Additionally, the policy emphasizes the importance of compliance with applicable laws and regulations, as well as international best practices. Overall, the Draft Environmental Social Policy aims to ensure that ADB-funded projects contribute to positive environmental and social outcomes while minimizing adverse impacts.

Draft ESS 1: Assessment and Management of Environmental and Social Risks and Impacts – [View document](#)

A Draft Assessment and Management of Environmental and Social Risks and Impacts outlines a structured approach to identify, evaluate, and mitigate potential adverse effects on the environment and society resulting from a project, policy, or activity. It typically includes methodologies for assessing various factors such as biodiversity, water resources, air quality, community well-being, and cultural heritage. The document aims to provide guidelines for decision-makers to minimize negative impacts and promote sustainable development by integrating environmental and social considerations into planning, implementation, and monitoring processes.



<https://www.adb.org/who-we-are/about/safeguard-policy-review>



Draft ESS 2: Labor and Working Conditions – [View document](#)

A comprehensive Labor and Working Conditions policy for the Asian Development Bank (ADB) typically encompasses several key areas. These may include:

1. **Non-Discrimination:** Ensuring equal opportunities for all employees regardless of race, gender, ethnicity, religion, disability, or other protected characteristics.
2. **Health and Safety:** Implementing measures to provide a safe and healthy work environment, including protocols for occupational health and safety, emergency response procedures, and ergonomic considerations.
3. **Work-Life Balance:** Supporting initiatives that promote a healthy balance between work responsibilities and personal life, such as flexible work arrangements, parental leave policies, and employee assistance programs.
4. **Fair Compensation:** Establishing transparent and equitable systems for determining wages, salaries, and benefits, with consideration for factors such as job responsibilities, qualifications, and market conditions.
5. **Labor Rights:** Upholding fundamental labor rights as defined by international conventions, including the right to collective bargaining, freedom of association, and protection against forced labor and child labor.
6. **Training and Development:** Providing opportunities for employee training, skill development, and career advancement to enhance job satisfaction and performance.
7. **Social Dialogue:** Promoting open communication and constructive engagement between management and employees, including mechanisms for feedback, grievance resolution, and employee representation.
8. **Compliance and Monitoring:** Establishing mechanisms to monitor compliance with labor laws, regulations, and internal policies, as well as conducting regular assessments to identify areas for improvement.

By implementing and adhering to a robust Labor and Working Conditions policy, the Asian Development Bank can foster a supportive and inclusive workplace environment that enables employees to thrive professionally and personally while upholding the organization's values and commitments to social responsibility.

Draft ESS 3: Pollution Prevention and Resource Efficiency – [View document](#)

The Pollution Prevention and Resource Efficiency initiative by the Asian Development Bank (ADB) aims to address environmental challenges in the Pacific by promoting sustainable practices and technologies. This initiative focuses on reducing pollution at its source, thereby minimizing adverse impacts on ecosystems and human health. It also emphasizes the efficient use of resources to minimize waste generation and maximize resource productivity. Through partnerships with governments, businesses, and communities, the ADB works to implement policies, programs, and projects that promote pollution prevention and resource efficiency across various sectors such as industry, agriculture, and transportation. The ultimate goal is to support sustainable development in the region while safeguarding the environment for future generations.

Draft ESS 4: Health, Safety, and Security – [View document](#)

The Asian Development Bank (ADB) has prioritized Health, Safety, and Security (HSS) measures to ensure the well-being of its staff and stakeholders across its operations, including in the Pacific region. This comprehensive approach encompasses policies, guidelines, and training programs aimed at preventing accidents, promoting health, and mitigating security risks.



In the Pacific region, the implementation of HSS measures involves tailored strategies considering the unique geographical, socio-economic, and cultural contexts of each country. This includes assessing and addressing specific health challenges, such as infectious diseases or limited access to healthcare facilities, as well as identifying and mitigating security risks, such as natural disasters or civil unrest.

Key components of ADB's HSS implementation in the Pacific may include:

- Risk Assessment: Conducting thorough risk assessments to identify potential health, safety, and security hazards in project areas and offices.
- Policy Development: Developing and enforcing robust HSS policies and guidelines that comply with international standards and local regulations.
- Capacity Building: Providing training and capacity-building programs to ADB staff, project partners, and local communities to enhance their awareness and skills in health, safety, and security management.
- Collaboration: Collaborating with government agencies, non-governmental organizations, and other stakeholders to leverage resources and expertise in addressing HSS challenges.
- Emergency Preparedness and Response: Establishing protocols and procedures for emergency preparedness and response, including evacuation plans, medical assistance, and crisis management.
- Monitoring and Evaluation: Regularly monitoring and evaluating the effectiveness of HSS measures to identify areas for improvement and ensure continuous adaptation to changing circumstances.

By prioritizing Health, Safety, and Security across its operations and tailoring strategies to the Pacific region's specific needs, the Asian Development Bank aims to create a safe and secure environment for its staff, partners, and beneficiaries while promoting sustainable development and poverty reduction in the region.

Draft ESS 5: Land Acquisition and Land Use Restriction – [View document](#)

The Asian Development Bank (ADB) often supports land acquisition and land use restriction projects in the Pacific region to facilitate development initiatives. These projects typically involve acquiring land for infrastructure development, conservation, or community use, while also implementing restrictions to ensure sustainable land management and protection of natural resources.

The process usually begins with thorough consultation with local communities, governments, and stakeholders to identify suitable lands for acquisition and establish appropriate land use restrictions. ADB provides technical assistance and funding to support this process, ensuring that it aligns with national development priorities and international best practices.

Once lands are acquired, ADB helps implement land use restrictions through legal frameworks, zoning regulations, and community agreements. These restrictions may include conservation easements, protected area designations, or regulations on land development to safeguard environmental integrity, cultural heritage, and community livelihoods.

Implementation in the Pacific often involves capacity building efforts to empower local authorities and communities to enforce land use restrictions effectively. This includes training programs, awareness campaigns, and institutional support to ensure long-term sustainability and compliance with project objectives.

Overall, ADB's involvement in land acquisition and land use restriction projects in the Pacific aims to promote inclusive and sustainable development while safeguarding the region's natural and cultural heritage.

Draft ESS 6: Biodiversity and Sustainable Natural Resource Management – [View document](#)

The Draft Biodiversity and Sustainable Natural Resource Management for the Pacific is a comprehensive framework aimed at addressing the conservation and management of biodiversity and natural resources in the Pacific region. It outlines strategies and actions to safeguard the unique ecosystems, species, and cultural heritage of the Pacific islands while promoting sustainable development. The draft emphasizes the importance of collaboration among governments, communities, and stakeholders to achieve conservation goals and ensure the long-term viability of Pacific ecosystems. Key components include habitat preservation, sustainable resource utilization, biodiversity monitoring, capacity building, and community engagement. The draft seeks to balance conservation efforts with the socio-economic needs of Pacific island nations, recognizing the interconnectedness of environmental health and human well-being in the region.

Draft ESS 7: Indigenous Peoples – [View document](#)

The Draft Policy Indigenous Peoples for the Pacific seeks to address the rights, needs, and aspirations of indigenous communities across Pacific nations. It emphasizes the recognition and protection of indigenous rights, including land rights, cultural heritage, and self-determination. The policy aims to foster meaningful engagement and collaboration with indigenous peoples in decision-making processes, ensuring their voices are heard and respected. Additionally, it outlines strategies for promoting indigenous-led development initiatives, enhancing access to essential services, and addressing socio-economic disparities. Overall, the policy endeavors to empower indigenous communities and promote their well-being, while acknowledging their unique cultural identities and contributions to the region.

Draft ESS 8: Cultural Heritage – [View document](#)

The Draft Policy on Cultural Heritage for the Pacific aims to safeguard and promote the diverse cultural heritage of the Pacific region. It recognizes the importance of preserving tangible and intangible cultural assets, including traditional knowledge, languages, artifacts, and sacred sites. The policy emphasizes community engagement, collaboration with indigenous groups, and the integration of cultural heritage into sustainable development strategies. It also addresses the challenges of climate change, globalization, and cultural appropriation, proposing measures for their mitigation. Overall, the policy seeks to foster a sense of identity, pride, and resilience among Pacific communities while promoting cultural exchange and understanding on a global scale.

Draft ESS 9: Climate Change – [View document](#)
Overview:

The Draft Policy on Climate Change Adaptation and Mitigation in the Pacific addresses the unique challenges faced by Pacific Island nations in combating climate change. It aims to provide a comprehensive framework for both adaptation and mitigation strategies tailored to the specific needs and vulnerabilities of the region.

Key Points:

1. **Vulnerability Assessment:** The policy emphasizes the importance of conducting thorough vulnerability assessments to understand the specific impacts of climate change on Pacific Island nations, taking into account factors such as sea-level rise, extreme weather events, and ocean acidification.
2. **Adaptation Measures:** It outlines strategies for building resilience and adaptive capacity within communities, including the development of early warning systems, coastal protection measures, sustainable land-use planning, and the promotion of climate-resilient agriculture and infrastructure.
3. **Mitigation Efforts:** The policy acknowledges the responsibility of Pacific Island nations to contribute to global efforts to reduce greenhouse gas emissions. It encourages the adoption of renewable energy sources, sustainable transportation systems, and the preservation of carbon sinks such as forests and mangroves.
4. **Capacity Building and Collaboration:** The policy underscores the importance of enhancing local capacities for climate change adaptation and mitigation through education, training, and technology transfer. It also promotes collaboration between governments, civil society organizations, the private sector, and international partners to leverage resources and expertise.
5. **Monitoring and Evaluation:** To ensure effective implementation, the policy proposes the establishment of monitoring and evaluation mechanisms to track progress, assess the effectiveness of interventions, and adjust strategies as needed based on emerging climate trends and evolving scientific knowledge.

Conclusion:

The Draft Policy on Climate Change Adaptation and Mitigation in the Pacific represents a proactive and collaborative approach to addressing the urgent challenges posed by climate change in the region. By prioritizing both adaptation and mitigation measures tailored to local contexts, it aims to safeguard the livelihoods and well-being of Pacific Island communities while contributing to global efforts to combat climate change.

Draft ESS 10: Stakeholder Engagement and Information Disclosure – [View document](#)

The Draft Policy on Stakeholder Engagement and Information Disclosure for the Pacific is a document aimed at establishing guidelines and procedures for engaging with stakeholders and disclosing information in the Pacific region. It emphasizes transparency, inclusivity, and accountability in decision-making processes related to policies, projects, and initiatives that impact the Pacific community. The policy outlines mechanisms for involving a diverse range of stakeholders, including local communities, indigenous groups, government agencies, NGOs, and businesses, in decision-making processes. It also highlights the importance of providing accessible and timely information to stakeholders to ensure their meaningful participation and informed decision-making. The draft policy seeks to promote sustainable development, environmental conservation, and social equity in the Pacific region through collaborative and transparent governance practices.

Draft Prohibited Investment Activities List – [View document](#)

The Draft Policy Draft Prohibited Investment Activities List for the Pacific outlines a set of regulations aimed at restricting certain investment activities within the Pacific region. The policy aims to safeguard environmental integrity, cultural heritage, and community well-being by prohibiting investments that may pose significant risks or harm to these aspects. It identifies specific industries or practices deemed incompatible with sustainable development goals, such as fossil fuel extraction, deforestation, and activities that exploit indigenous communities or their resources. The policy seeks to promote responsible and ethical investment practices while fostering economic growth that aligns with the region's values and long-term sustainability objectives.

Draft Requirements for Financing Modalities and Products – [View document](#)

The Draft Policy Requirements for Financing Modalities and Products for the Pacific outlines the essential criteria and guidelines for financial mechanisms and products tailored to the unique needs of Pacific Island nations. It addresses issues such as accessibility, sustainability, risk management, and alignment with regional development priorities. The policy aims to foster financial inclusion, support economic development, and enhance resilience to environmental and economic challenges in the Pacific region. It emphasizes collaboration among stakeholders, innovation in financial services, and adherence to ethical and transparent practices.

Other Comments
Names and designation of participant/s:

No.	Name and Position	Organization
1	Mr. Marawa- Executive Officer	Diabetes Fiji Inc.