

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

Submission from Fibre Cement Products Manufacturers
Association

Received on January 30, 2024

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Director,
Sri Lanka Resident Mission,
Asian Development Bank,
23, Independence Avenue,
Colombo.7.

2024.01.30

Subject: **Addressing Concerns Regarding Chrysotile Fiber in ADB Safety Policy Statement**

Dear Sir /Madam,

On behalf of the Fibre Cement Products Manufacturers Association (FCPMA), we commend the Asian Development Bank (ADB) for the significant progress made in revising its Safety Policy Statement (SPS). As a founding member of ADB, Sri Lanka has benefitted greatly from its support, receiving over \$11.2 billion in public sector loans, grants, and technical assistance to date.

While we applaud the commitment to investment and the inclusion of national legal frameworks in the SPS consultation documents, we have concerns about a proposed restriction on Chrysotile fiber in the ADB **Prohibited Investment Activities List**. We believe this inclusion lacks evidence in light of scientific advancements and a differentiated approach towards this specific fiber.

Our primary concern is the lack of distinction between Chrysotile and other asbestos types in the restrictions. Recent scientific research highlights the clear differences between Chrysotile's serpentine structure and the amphibole structure of other, more harmful, asbestos fibers, both in their chemical properties and health risks. Notably, the International Labour Organization (ILO) Convention 162 specifically advocates for the safe and controlled use of serpentine asbestos like Chrysotile, while calling for the discontinuation of specific amphibole types.