



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

Submission from Oxfam Pilipinas Received on February 5, 2024

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Sent on: Monday, February 5, 2024 5:45:42 AM

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Submitted on Mon, 02/05/2024 - 13:45

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Overview/General Comments

Thank you very much for the comprehensive discussions this morning. Please allow me to share with you suggestions and inputs from our end, Oxfam Pilipinas. Some of which were already discussed earlier, but I'm including here for your reference as well.

Will add more for ESS9 in the coming days. Thank you very much!

Draft ESS 1: Assessment and Management of Environmental and Social Risks and Impacts

Scope 3. Paragraph 7 - It should be indicated specifically that upon review scope of the E&S may be determined by the ADB – should they found the determined scope by the client/borrower to not encompass all of the geographic and sectoral scopes of the undertaking.

Scope 4. Part D. Environmental and Social Assessment. Paragraph 26 - Provided that the internationally tapped experts have the local knowledge and understanding of local contexts and the subsequent socio-economic and geo-political factors in the area.

Scope 4. Part H. Monitoring, Adaptive Management, and Reporting - Sustainability Planning should be an integral part of the process, looking into how the further implementation of the project might have any other adverse effects beyond the financing of the project. Especially since other impacts can only be seen after a number of years from project implementation.

Scope 4. Part I. Stakeholder Engagement and Information Disclosure - Data on the personal information of affected persons should be open for deletion any time upon the request of the concerned party – in adherence to policies related to data privacy.

Engagement towards stakeholders should be more than and beyond the provision of sufficient information, but rather including them on the steps where ideas and buy in, as part of the collective ownership of the communities should be included.

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yes