

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

Submission from Union Aid Abroad - APHEDA
Received on January 24, 2024

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Feedback Form: ADB Draft Environmental and Social Framework

This form is provided for you to send feedback on draft ADB Environmental and Social Framework and 10 Environmental and Social Standards.

- Select which section you wish to comment on
- Write your comments in the space provided
- Enter your name, email address, and your affiliation
- Send to safeguardsupdate@adb.org

An email will be sent confirming you have successfully submitted your feedback.

If you have questions or if you are sending attachments in Word, pdf, Excel or other formats, please send them by [email](#).

Overview/General Comments

Click or tap here to enter text.

Draft Environmental and Social Policy

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

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Draft ESS 2: Labor and Working Conditions

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Draft ESS 3: Pollution Prevention and Resource Efficiency

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Draft ESS 4: Health, Safety, and Security

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Draft ESS 5: Land Acquisition and Land Use Restriction

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Draft ESS 6: Biodiversity and Sustainable Natural Resource Management

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Draft ESS 7: Indigenous Peoples

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Draft ESS 8: Cultural Heritage

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Draft ESS 9: Climate Change

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Click or tap here to enter text.

Draft ESS 10: Stakeholder Engagement and Information Disclosure

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Draft Prohibited Investment Activities List

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RE (viii)

While recognizing the welcome shift in adding asbestos containing material into the exclusion list, we are concerned the draft wording could be interpreted still as fibre unbonded only. Strongly recommend adding the wording ...'whether or not bonded' after existing wording. That is, recommend the statement to be revised to read Viii) production of, or trade in, or use of asbestos fibers, whether or not bonded.

RE (i) The wording would suggest the ADB supports child labour and forced labour that is not regarded by some as a harmful or exploitative form? For clarity suggest removing words 'exploitative and harmful forms of' from this exclusion statement.

Draft Requirements for Financing Modalities and Products

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About You

**required fields*

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I agree to have my comments disclosed on the ADB website?*

☒ YES

☐ NO

Save and submit to safeguardsupdate@adb.org