

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

Submission from the Committee of Emergency Situation and Civil  
Defence

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#### **Draft Environmental and Social Policy**

The use of borrower's E&S systems and a common approach with co-financiers raises concerns about the consistency and effectiveness of these systems. It is crucial to ensure that the borrower's systems and the agreed-upon common approach meet rigorous environmental and social standards to effectively manage project risks and impacts. There should be clear criteria and guidelines for evaluating the adequacy and robustness of these systems. In addition, it requires thorough evaluation and verification. Adequate time will be needed to assess the capacity, expertise, and resources of the borrower's systems, as well as to establish clear criteria and guidelines for their evaluation. Ongoing monitoring and evaluation of these systems throughout the project lifecycle will also add to the implementation timeline.

#### **Draft ESS 7: Indigenous Peoples**

It is critical to consider the potential disadvantages or problems associated with an exclusive focus on indigenous peoples in the context of development projects: 1. Prioritizing the rights and interests of indigenous peoples without taking into account the wider local community may lead to the exclusion of other groups that also have historical ties to the project area. 2. Although Indigenous peoples often have distinct cultural identities and historical ties to the land, focusing primarily on their representation may result in the underrepresentation or marginalization of other members of the local community who have important knowledge and perspectives on the project area. 3. An exclusive focus on indigenous peoples may result in an inequitable distribution of project benefits. If benefits accrue primarily to indigenous peoples, this could exacerbate existing socio-economic disparities and create tensions between different local population groups. 4. Ignoring the perspectives and contributions of non-Indigenous communities can result in missed opportunities for collaboration, sharing local knowledge and co-creating sustainable development solutions.

#### **Draft ESS 9: Climate Change**

Lowering the threshold for monitoring and reporting greenhouse gas emissions from 100,000 tons to 20,000 tons of carbon dioxide equivalent per year may create an additional administrative burden for project proponents, especially for smaller-scale projects. Accurately measuring and reporting emissions may require more resources and expertise, potentially impacting the feasibility of certain projects. Lowering the reporting threshold increases the number of projects that need to track and report their emissions.

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