

ADB Safeguard Policy Review Update – Phase 2 Regional Consultation Summary: Policy Architecture Consultations

15-17 November 2021

Disclaimer: The views expressed in this document are the views of the author/s and do not necessarily reflect the views or policies of the Asian Development Bank, or its Board of Governors, or the governments they represent. ADB does not guarantee the accuracy of the data included in this document and accepts no responsibility for any consequence of their use. The countries listed in this document do not imply any view on ADB's part as to sovereignty or independent status or necessarily confirm to ADB's terminology.

I. BACKGROUND

1. The Asian Development Bank (ADB) is undertaking a comprehensive review and update of its 2009 Safeguard Policy Statement (SPS).¹ The update process has been initiated by ADB Management following a Corporate Evaluation of the SPS by ADB's Independent Evaluation Department (IED), completed in May 2020 (IED Report).² The update will build off the findings and recommendations of the IED report, which ADB Management endorsed. Overall, the policy update will seek to strengthen safeguard implementation effectiveness and efficiency, in ways that will enhance beneficial safeguards outcomes for the environment and affected people.

2. The revised safeguard policy is expected to be ready for ADB Board consideration in 2024, following a process of further reviews, policy development, and meaningful stakeholder engagement. As part of this process, ADB is undertaking a series of brief analytical studies, which will benchmark ADB's current SPS against the policies of selected multilateral financial institutions (MFIs) and also briefly consider implementation experience.³ The studies will inform the development of the new safeguard policy and will be provided for stakeholder review and consultations.⁴ Stakeholder engagement and consultation will have three main phases: Phase I - preliminary information and outreach on the overall approach for the policy update and stakeholder engagement plan (SEP); Phase II - consultation on the analytical studies; and Phase III - consultation on the draft policy paper. The objective of Phase II consultations, currently being conducted, is to obtain a better understanding of the views of stakeholders on safeguards implementation challenges and good practices, as well as recommended policy directions.

3. This document provides a summary of the consultations on the policy architecture study which (i) reviewed ADB's current safeguard architecture; and (ii) undertook a broad comparison of the architecture models of other multi-lateral financial institutions (MFIs). The study has been informed by internal discussions with ADB staff and management and provides recommendations for a revised safeguards policy architecture and scope.

II. PROCEEDINGS

4. The online regional consultations for policy architecture launched the Phase II consultations for the SPS update. These were conducted between 15-17 November 2021, with five sessions organized to allow participation across various time zones. These were targeted at ADB's developing member countries (DMCs), other ADB regional and non-regional member countries, as well as civil society organizations (CSOs) and non-governmental stakeholders.⁵ A total of 127 stakeholders participated in the five sessions, where each session ran for more than two hours, providing ample time for discussion. The main language used in all sessions is English and simultaneous interpretations were provided.⁶ Consultation materials were provided to the participants in advance, and these were translated into various languages.⁷

¹ ADB. 2009. [Safeguards Policy Statement](#). Manila.

² ADB. 2020. [Evaluation Document: Effectiveness of the 2009 Safeguard Policy Statement](#). Manila.

³ The studies are intended to complement the evaluation completed by IED in May 2020 and will not duplicate IED's work on the overall effectiveness of the SPS.

⁴ The update process is guided by a [Stakeholder Engagement Plan](#).

⁵ The five sessions were for: (i) DMCs in South, Central and West Asia; (ii) DMCs in East and Southeast Asia and the Pacific; (iii) CSOs and non-governmental stakeholders in South, Central and West Asia; (iv) CSOs in East and Southeast Asia and the Pacific; and (v) CSOs in North America and Europe.

⁶ Languages available for simultaneous interpretations were Hindi, Urdu, Russian, Bahasa Indonesia, Chinese, Khmer, Lao, and Vietnamese

⁷ The analytical study and presentations are available in English, Hindi, Russian, Chinese, and Bahasa Indonesia.

5. The agenda for five sessions followed a similar format, starting with a welcome message from Bruce Dunn, Director of the Safeguards Division (SDSS), Sustainable Development and Climate Change Department (SDCC). It was followed by presentations from Zehra Abbas, Principal Environment Specialist, SDSS, and Madhumita Gupta, Principal Social Development Specialist, SDSS on the preliminary findings of the Policy Architecture study. A moderated discussion followed the presentation to solicit feedback from the participants around some set questions as well as an open discussion on the policy update. The session ended with a brief event evaluation and a synthesis by Bruce Dunn.

6. In his welcome message, Bruce Dunn narrated the history and purpose of the SPS and how it is related to ADB's other policies, strategies, and procedures. He reported on the detailed review of the SPS effectiveness conducted by the IED in May 2020 and presented its key findings and recommendations. He gave an overview of the ongoing SPS Review and Update Process, presented the timeline and the topics of the various analytical studies, and presented the approach for robust and inclusive stakeholder consultations that underpin the entire review process.

7. Zehra Abbas presented the objectives, methodology, and the result of the comparative analysis of the safeguards frameworks of selected MFIs. She elaborated that the safeguards frameworks of MFIs extend to cover thematic topics and cross-cutting elements such as gender, social protection, climate change, and broader social dimensions that may need to be considered by ADB in the policy update. Five criteria used for the comparative analysis were discussed in detail: (i) policy structure, (ii) scope and coverage of policies, (iii) safeguards implementation procedures, (iv) risk classification, and (v) compliance requirements. She also presented the preliminary findings for the first three criteria.

8. Madhumita Gupta continued the presentation by showing the comparative analysis findings for the remaining two criteria on risk classification and compliance requirements and presented the key takeaways of the comparative study. She explained that the Performance Standards (PS) model provides clarity and removes ambiguity in safeguards implementation through detailed and explicit requirements for both borrower and staff, and presented the proposed scope of the future policy, and next steps for policy roll-out. She added that the balance between front loaded safeguards due diligence requirements and compliance over time can only be achieved with the establishment of enhanced safeguard quality assurance systems.

III. KEY TAKEAWAYS AND DISCUSSION

9. In the discussion moderated by Felix Oku, Senior Social Development Specialist (Safeguards), SDSS, the participants were encouraged to share their perspectives and recommendations for improving ADB safeguard policy and implementation. A set of questions were shared with the participants to guide them to formulate their views or questions. These questions were: (i) What are your views on the merits of aligning with the PS model for safeguards?; (ii) Are there any important areas that you feel should be added to the scope of the new safeguards policy?; and (iii) How would you recommend that safeguards implementation outcomes be improved?

10. The discussion highlighted some important issues from participants: (i) use of Country Safeguards System (CSS) and alignment of SPS with national policies; (ii) environment, biodiversity, and climate change; (iii) consideration of human rights in safeguards; (iv) involuntary resettlement, displacement, and compensation; (v) advantages and disadvantages of moving to the PS Model; (vi) updating of ADB's Accountability Mechanism policy; (vii) implementation of safeguards for financial intermediary (FI) projects; (viii) Indigenous Peoples (IP) safeguards and project affected persons; (ix) gender; (x)

implementation challenges with the current SPS; and (xi) emerging issues and cross-cutting themes such as community and occupational health and safety, labor standards, and stakeholder engagement. Detailed feedback is found on Appendix 1.

11. A number of stakeholders asked if the use of CSS will be retained in the updated policy and asked ADB to reconsider conduct of CSS equivalency assessments when there is evidence of low capacity for safeguards implementation by borrowers. Participants put forth suggestions to include cultural sensitivity, awareness of regional socio-cultural diversity, unique legal systems, and advances in national laws in the design of the new safeguards policy.

12. On the possible shift to a PS model, participants offered a diversity of views. Some agreed that the PS model would bring more clarity and consistency, others raised concerns whether the PS model would address the challenges faced in implementing the current SPS. Stakeholders also sought clarification on how the balance between frontload requirements and compliance over time would be achieved. There were also discussions on how the PS model would address topics such as human rights in safeguards, safeguards for financial intermediary lending and information disclosure. Others saw the benefit for ADB to harmonize its policy with other MFIs but strongly recommended the conduct of capacity building prior to the implementation of the revised policy.

13. Some emerging issues that were highlighted included compliance of borrowers with the international human rights and climate change conventions; medical waste; displacement due to climate change; and animal welfare. Stakeholders also indicated that the safeguards policy update must be undertaken in the context of the new ADB Energy Policy and its alignment with international conventions.

14. Several queries were raised in relation to resettlement matters such as entitlements and compensation payments for people whose livelihoods were affected by projects, informal settlers, non-titled occupants, or landless people. There were also concerns raised about the timing of the payment of compensation.

15. Stakeholders also suggested that there needs to be more discussion on human rights in the updated SPS. There were suggestions to incorporate guidance from the United Nations (UN) Guiding Principles on Business and Human Rights into safeguards, as well as the conduct of an overall human rights risk assessment.

16. On stakeholder engagement, the discussion revolved around including Indigenous Peoples in the consultation and the possibility of having these consultations conducted in-person. It was also emphasized for ADB to conduct gender-balanced consultations at the project-level. Discussion also focused on the 120-days disclosure requirement for Category A projects, some participants suggested a review of the requirement, while others felt it should be retained as is. Some participants also indicated the need for ADB to be more transparent about the future safeguards implementation systems- the Operations Manual section and Staff Instructions of the updated policy. Moreover, discussion also revolved around having robust standards that protect stakeholders against reprisals.

17. On financial intermediaries (FIs), participants asked ADB to elaborate on its experience with the application of safeguards in the lending modality. Some stakeholders shared their observation of ADB-financed FIs that were not compliant with environmental and social safeguards.

18. In response, ADB staff reiterated the findings of the IED report which recommended more practical approaches for the strengthening and use of CSS. In addition, participants were informed that ADB is preparing an analysis of its past work on CSS and a dedicated

consultation for CSS will be organized. ADB acknowledged the various perspectives on the PS model and concurred that harmonization of ADB's SPS with other MFIs would provide greater clarity, less transactions costs for borrowers, and increased collaboration across MFIs that includes alignment for capacity building.

19. On FIs, ADB acknowledged that it is an area that needs further discussion. ADB sees FIs as a very important modality because it provides opportunities to channel financing in a wider scope and fund a range of enterprises—from micro, small, to medium enterprises—as well as cover a wide range of sectors. There was concurrence that there are challenges in implementing safeguards for this modality. ADB will be doing a further study on FIs – how safeguards can be strengthened, responsibilities for implementation cascaded, and to ensure the quality and consistency of monitoring and performance reports of the FIs' environmental and social management systems. A dedicated consultation on FIs is also planned.

20. ADB indicated that the revised Safeguard Policy will classify in terms of both safeguards impacts and risk and proposes an integrated risk-based classification. This will help in assessing risks during project implementation and operation and will ensure appropriate allocation of resources. ADB also acknowledged concerns raised regarding human rights, climate change, involuntary resettlement and compensation, gender, and indigenous peoples. Participants were assured that these issues will all be taken into consideration and subjected to rigorous stakeholder engagement, country dialogues as well as focus group discussions which will determine how these issues will be addressed in the policy.

IV. EVALUATION AND WRAP UP

21. The moderated discussions were followed by quick evaluation sessions. In all five sessions, most of the participants gave a rating of 4 (effective) or 5 (highly effective), on a scale of 1 to 5, and only very few rated ADB lower than 3. Written comments to improve the consultations are documented in Menti.com.

22. The synthesis for each consultation included a summary of key points and questions raised by participants. It was followed by an overview of the next steps and a reminder to send ADB further suggestions and recommendations in writing.

Session recordings can be accessed here:

1. 15 November 2021: Government stakeholders in East Asia, Pacific, and Southeast Asia: <https://events.development.asia/node/47766>
2. 15 November 2021: Government stakeholders in South Asia, and Central and West Asia: <https://events.development.asia/node/47771>
3. 16 November 2021: CSOs and other non-Governmental stakeholders in South Asia, and Central and West Asia: <https://events.development.asia/node/47776>
4. 17 November 2021: CSOs and other non-Governmental stakeholders in East Asia, Pacific, and Southeast Asia: <https://events.development.asia/node/47781>
5. 17 November 2021: CSOs other non-Governmental stakeholders in North America and Europe: <https://events.development.asia/node/47786>

FEEDBACK FROM STAKEHOLDERS

Disclaimer: In view of transparency, the feedback was documented based on the manner of delivery or sharing of the stakeholders, though some feedback was edited for brevity and clarity. They are categorized by topic and reflect questions, comments, conclusions, and recommendations of stakeholders. All the feedback is discussed in the interactive session that is part of the consultations.

1. Policy architecture

- Is ADB leaning to shift to the Performance Standard (PS) model. It also looks like safeguards compliance is being pushed to the client or to the borrower's rather than to the international financial institutions (IFIs) themselves. In the context of at least a million people having been affected by either economic or physical displacement (by multilateral financial institutions (MFIs) projects) over those four and a half years, the transfer of responsibility to the client will make things worse.
- In terms of the PS model, insights were shared on the way the standards evolved. Views on the human rights trends in the Asia Pacific Region were shared, which puts emphasis on women's rights, freedom of expression and freedom of association.
- Without addressing existing implementation challenges of the existing 2009 Safeguard Policy Statement (SPS) policy architecture, how can ADB ensure that a new PS model will be able to overcome the current implementation challenges in delivering the SPS?
- Why is the ADB spending so much effort transitioning to Performance Standards instead of allocating its financial and human resources to overcome the current implementation challenges?
- How will the ADB maintain the information disclosure period of 120 days to Category A (high risk, complex risks) under its proposed integrated categorization?
- What are the merits of aligning with the PS model? The content of the performance standards is critical, not the model itself.
- Further elaboration on the assertion that one of the advantages of shifting to PS model would be “reducing the transaction costs for co-financed projects” was sought.
- The overall advantage of moving towards the PS model was asked. The ADB will be moving from a position of strength to a position of weakness, particularly since the Independent Evaluation Department (IED) study also found out that ADB is doing a satisfactory job at project appraisal stage but needs more attention at the project implementation stage. By moving into the PS model, it seems that ADB is putting more compliance pressure at the implementation stage.
- What is the modular approach?
- It will be very helpful for all projects to be aligned with the PS model. A performance-based model will bring greater clarity and consistency. Under the current SPS and the three safeguard requirements, there is a lack of consistency and clarity on the interpretation of the requirements. It has become a continuous problem when some of the requirements are interpreted differently from project to project.

- How can ADB ensure under the new architecture, that the client will carry out a full and comprehensive assessment of reprisal risks and take measures accordingly? What is the rationale for choosing the five multilateral development banks (MDBs) in comparing their current architecture with ADB? Were there specific projects/ cases that were evaluated to substantiate that the performance model is the right model for the ADB to adopt right now?
- Observation was shared that ADB was looked at as a leader in certain thematic areas. How will the SPS review be an opportunity to establish ADB as a thought leader and not a follower?

2. Balancing frontloaded requirements and compliance over time

- Findings in monitoring International Finance Corporation (IFC) projects showing that communities are adversely affected when environmental and social impact assessments (ESIA) are not completed before project approval were shared. In some cases, the ESIA is completed after the negative impacts/ adverse effects on communities have already taken place. What are the considerations that ADB is looking into if compliance is going to be achieved over time?
- Paragraph 20 of SPS review and update mentioned “an approach to compliance where performance standards can be achieved over an agreed period of time.” Observations—citing some projects as examples—and questions were shared: How is reasonable time decided? What are the indicators in setting a reasonable timeframe? How does ADB intend to cover violations of human rights during an emergency situation like the coronavirus disease (COVID-19) pandemic?
- There were apprehensions over the whole idea of seeking compliance over time, citing Tata Mundra Coal Power Plant experience in India. Considering the transition to PS model for non-sovereign borrowers, clarity on the following was sought: Where is the precautionary principle [in compliance over time]? How can ADB get into voluntary disclosure mode? What are the obligations of the ADB, and what are the oversight mechanisms? How will ADB ensure comprehensive environmental and social risk assessments prior to project approval?
- Finding the balance between the front load requirement and compliance over time was asked. In succeeding presentations, ADB should show how it intends to operationalize that (finding the balance).
- Clarification was sought on how the balance between front load requirements and compliance over time will be operationalized in the different phases of the project cycle while ensuring that the current safeguards are not diluted.

3. Harmonization with other multilateral financial institutions

- To ensure harmonization and accountability regarding safeguards, is there a possibility for the preparation of joint training and capacity building programs among ADB, World Bank, and Asian Infrastructure Investment Bank (AIIB)?
- Harmonization will be helpful to implementing agencies especially if the ADB and the World Bank will have the same set of standards for all the externally financed projects.

4. Risk screening and integrated risk classification

- Screening and categorization in energy infrastructure projects is one of the most important bottlenecks to steer due diligence and accountability. Robust screening would ensure avoiding all the environmental and social harms occurring after or during project implementation.
- How will ADB ensure that risk assessments are done diligently so situations such as the Tata Mundra case can be prevented from repeating? When will the technical guidance notes be released? What is the rationale for opting for non-binding notes versus a binding technical guidance note? Can the proposed integrated risk classification system avoid under-categorization of projects?
- Apprehension about under-categorization as captured by the IED report was expressed. Will the proposed SPS and integrated assessment be able to minimize or prevent under-categorization?

5. Consistency with national legal requirements

- Will ADB consider the harmonization of national legislations with the ADB safeguard policy?
- A clarification was made on whether the SPS update can harmonize the discrepancy between national legislation and SPS, citing as an example the SPS requirement for compensation to be done prior to the commencement of a project.
- There was an emphasis on cultural sensitivity and awareness of the socio-cultural diversity in the region, respect of historical background, and individual legal systems in each member country. There are also sensitive topics such as human rights, climate change, labor and working conditions, and the supply chain risks.
- Will the country safeguard system be highlighted in the safeguard policy review?
- What are the advantages for communities in ADB's push for the use of the country safeguard system, considering that the current approach of undertaking an equivalency assessment has not worked and that studies revealed the capacity of borrower countries is low?
- Will the ADB retain the country safeguard systems after spending over \$40 million on technical assistance strengthening it?

6. Environment and climate change

- How does the ADB plan to ensure compliance of a country-borrower with international human rights and environmental legislation?
- Medical wastes (both solid wastes and liquid wastes) from laboratories, hospitals, and health centers seemed to be excluded in the assessment.
- In the new policy, will ADB keep its commitments to international conventions, particularly in the context of the new ADB Energy Policy? How will ADB implement these conventions in countries that have not ratified or adopted those conventions?

- There was interest in waste to energy (WTE) assimilation and nuclear energy, which were not present or updated in Appendix V of the current SPS.
- ADB's new energy policy provision on WTE says it will comply with international conventions. The participant highlighted that dangerous byproducts of waste incineration are mercury and persistent organic pollutants. They are banned under Stockholm Convention¹, the Basel Convention², and mercury is prohibited under the Minamata Convention.³ The Inter-American Development Bank (IDB) has already included this provision into their framework but none for ADB.
- There was a suggestion to include all fossil fuel and nuclear financing in the prohibition list.
- On climate change and involuntary resettlement, the vulnerability of affected people increases multiple fold from the impact brought by climate change. What are the mechanisms that will be in place in the updated policy to protect the vulnerable population?
- Intensive livestock farming is directly linked to a myriad of environmental safeguards issues including climate change, biodiversity loss, public health risk, and food security threats. There is a clear urgency to revisit the financial flow in this industry.
- The new SPS should recognize the vital interconnections among animal welfare, climate, and biodiversity.

7. Financial intermediaries

- What was ADB's experience with financial intermediaries on the application of the SPS? What are the lessons learned, what difficulties and positive things were encountered?
- Financial intermediaries (FIs) are not compliant with environmental and social safeguard systems, and such is not covered by the policy architecture. ADB seemed to have no leverage to make the FI compliant on the labor issue complained about in the past.
- Why are the FIs eligible for ADB financing when they do not have environmental and social management systems or any experience dealing with environmental and social issues?

8. Gender

- Social and gender risks should be assessed separately, especially in urban projects. Categorization likewise should be in terms of social and gender impacts (citing the Nenskra hydropower project)
- How is the proposed safeguard policy going to play a part in the ADB Strategy 2030 particularly with gender equality issues? Why is there no analytical study on gender or gender-based violence (GBV) or sexual exploitation and abuse and harassment

¹ UN Environment Programme. 2004. [Stockholm Convention on Persistent Organic Pollutants](#).

² UN Environment Programme. 1989. [Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal](#).

³ UN Environment Programme. 2017. [Minamata Convention on Mercury](#).

(SEAH) nor scheduled consultation as part of this safeguard review and update process?

- There was interest to see harmonized gender mainstreaming in the updated SPS between ADB's Gender and Development Policy and Gender Action Plans that goes beyond GBV and SEAH. Equal payments for equal wages were cited as an example.

9. Human rights

- There was a clarification on whether children's rights were included within the social protection category. Joining Forces Asia (a non-government organization) is working on submitting an advocacy brief for this consultation session using the child rights lens.
- On the SPS human rights gap, there is a risk in parking good human rights language in a vision statement without specifically spelling out the implications. That can only generate cynicism and a sense that human rights is used for window dressing.
- There is an increasing trend to incorporate guidance from the United Nations (UN) Guiding Principles on Business and Human Rights into safeguards. This should be prominently discussed in terms of the policy architecture.
- ADB has to do an overall human rights risk assessment. It does not mean an adjudication of the human rights performance of a country, but at the least, conduct an assessment of what the project could mean regarding economic, social, and political rights of the affected people.

10. Implementation Issues

- The ADB due diligence should stay strong and unless all the safeguards are met, the project should not move forward. That is a major principle of European Investment Bank's (EIB), and European Bank for Reconstruction and Development's (EBRD) safeguard policies that are based on the European Union's (EU) environmental principles, including conventions like the Bern Convention on wildlife.⁴ The Kvesheti-Kobi Road project was cited as an example.
- There is a need for consultants to have clear instructions in the new safeguard policy statement to further safeguard implementation and integration.
- There was a clarification on whether the technical guidance note (from the new energy policy) is legally binding or not, and whether it will be made public.
- Non-binding guidance notes and documents are rarely followed. The difficulty of persons with disabilities to meaningfully participate in consultations was cited as an example.
- There was a clarification on whether there would be provisions that would enable emergency lending in a post disaster situation (recovery from COVID-19 pandemic) while ensuring that safeguards are strictly being complied with.

⁴ Council of Europe. 1982. [Bern Convention: Convention on the Conservation of European Wildlife and Natural Habitats](#).

11. Indigenous peoples

- Project-specific: a proposed road rehabilitation project (categorized as C) cuts across an Indigenous Peoples (IP) community (categorized as B). The sub-project was subsequently dropped. What can be the justification for this IP categorization?
- The ongoing intensive consultations was appreciated, but wondered why the indigenous peoples were not present in the discussion. It should be ensured that IPs' voices are also heard, and their inputs are also considered so that they would know about these safeguards and they will be empowered to use them.
- Free, Prior, and Informed Consent (FPIC) needs to be applied not just to indigenous peoples but also to all project-affected peoples. All project-affected people should have the right to receive all information about a project under consideration and be able to make a decision, have the right to consent to or to refuse a project that is going to affect their lives. ADB should become the first MFI to have a much broader FPIC approach to all project affected peoples.

12. Involuntary resettlement, displacement, and compensation

- There should be compensation for those people who are impacted by a project through economic displacement due to a disruption of business operations (example is road closure) which led to bankruptcy.
- What are the requirements to provide land to illegal settlers/landless?
- There was a clarification on whether the commitment to restore the livelihood of affected people will be retained in the new policy architecture. There was a real commitment in the policy language of the 2009 SPS towards protecting those who are living on de facto public lands without any titles because they are going to be the most vulnerable.
- There were observations on non-compliance against the standards committed at the appraisal level (right of way clearing). Implementing departments do not know the policies of the donor or financing partner.
- In most countries, the law requires that compensation should be paid before people are displaced.

13. Stakeholder engagement

- Will the presentation slides be shared publicly following the meeting?
- There was an absence of a translation facility in Bangla or Bengali language.
- Will the Operations manual and staff instructions be released in the public domain for open consultation once the SPS has been updated?
- Women representatives especially from public services union should be involved in project-level consultations.
- The current trends on reprisals and stakeholder engagement in the region were referred as very discouraging, including the ADB performance around accountability

mechanisms and in terms of dealing with retaliation and complaints. Strongly suggested a robust standard in the area.

14. Accountability mechanism

- A clarification was made if ADB will also be reviewing its accountability mechanism in view of the review of this SPS.

15. Others

- Will the updated policy apply only to new projects?
- How can current documents pertaining to core labor standards, such as ADB's 2001 Social Protection Strategy, Social Protection Operational Plan 2014-2020, be migrated into the new social safeguard policy?
- Will there be clear provisions in the new SPS for associated facilities that would extend beyond the environmental aspects?
- Technical assistance in co-financing projects has led to safeguards implications but it looks like it was also not covered by the policy architecture study.
- Additional thematic themes that can be considered in the SPS review were provided. These are (1) grievance redress mechanisms (GRM) requirements for workers, (2) strengthening community health and safety requirements, and (3) strengthening occupational health and safety.