

ADB Safeguard Policy Review Update – Phase 2 Regional Consultation Summary: Land Acquisition, Restriction of Access, and Involuntary Resettlement Consultations

6-8 December 2021

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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 a 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. This document provides a summary of the consultations for the analytical study on Land Acquisition, Restriction of Access, and Involuntary Resettlement.

II. PROCEEDINGS

3. The online regional consultations for Land Acquisition, Restriction of Access, and Involuntary Resettlement were conducted on 6-8 December 2021. Five sessions were organized in different time zones to allow participation of ADB's developing member countries (DMCs), other ADB regional and non-regional members, as well as civil society organizations (CSOs) and non-governmental stakeholders.⁵ A total of 123 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

4. The agenda for five sessions followed a similar format, starting with a welcome message from Bruce Dunn, Director of the Safeguards Division (SDSS) of the Sustainable Development and Climate Change Department (SDCC). It was followed by a presentation from Irina Novikova, Senior Social Development Specialist (Safeguards), SDSS, on the Safeguard Requirement 2:

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 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.

Involuntary Resettlement (SR2) Safeguard and Review Process. Ralf Starkloff, ADB Social Safeguards Consultant, presented the study findings and key issues. A discussion, moderated by Reisha Jones, ADB Consultant, followed where participants were provided space to ask questions and give input for the policy update. The session ended with a brief event evaluation and a synthesis by Bruce Dunn. Azim Manji, Stakeholder Engagement Team Leader (Consultant), served as overall moderator in the five sessions.

5. In his welcome message, Bruce Dunn provided a background and introduced the purpose of the SPS and how it is linked with ADB's other policies, strategies, and procedures. He discussed the relevant findings from the review of the SPS effectiveness conducted by ADB's IED and presented the key findings and recommendations. He gave an overview of the ongoing SPS Review and Update Process by presenting the timeline and topics of various analytical studies and by presenting the approach for a strong, intuitive, and inclusive stakeholder consultation that underpins the entire review process. Finally, he emphasized the need for ADB to take a more integrated assessment approach while maintaining focus on protecting people who would be impacted by changes in land use access. He added that these contextual issues are important and should be considered in the screening, assessment, and implementation with respect to land acquisition and involuntary resettlement processes in ADB operations.

6. Irina Novikova gave an overview of the ADB's 2009 SPS and the provisions for involuntary resettlement (IR) safeguards including the objectives alongside the key requirements such as screening, categorization, preparation of the mitigation plan, restoration of livelihood through replacement and compensation for lost assets, and monitoring of resettlement outcomes, among others. She then addressed the key findings and recommendations of the IED evaluation study based on ADB's experience in applying the SPS. The IED report gave an impetus for the process of reviewing, revising, and strengthening the safeguard policy and its implementation. Finally, she cited key areas for improvement that include broader policy coverage and policy areas that need further elaboration such as social risk management, risk-based categorization for projects, the need for an integrated environmental and social impact assessment, and as well as policy areas which require improved guidance and implementation such as livelihood restoration, consultations, and assistance to vulnerable groups.

7. Ralf Starkloff, ADB Consultant, presented the key initial findings of the benchmarking study comparing ADB's IR policy provisions against the corresponding policy standards of selected MFIs – the European Bank for Reconstruction and Development (EBRD), the International Finance Corporation (IFC), the Inter-American Development Bank (IADB), and the World Bank. The draft analytical study identifies convergences and differences, as well as strengths and weaknesses, and highlighted many critical issues involving operational and conceptual challenges on involuntary resettlement. Some of the key issues for consideration relate to policy architecture and integration, scope of policy application, and strengthening of other provisions such as the link of land acquisition/land use restriction with the readiness of the technical design and further clarity on related provisions for valuation of lost assets, livelihood restoration, relocation of non-titled displaced persons, gender, and mitigation measures for host communities, among others.

III. KEY TAKEAWAYS AND DISCUSSION

8. In the moderated discussion, participants were encouraged to share views and recommendations for improving ADB safeguard policy and its implementation. A set of questions were posed to guide participants in formulating their views or questions, including: (i) What do you expect from the SPS update for the proposed standard on land acquisition?; (ii) What issues

need to be covered?; (iii) What changes would you like to see?; and (iv) What are your views on the following issues: a) The scope of the standard to cover both voluntary and involuntary land acquisition and land use restriction; b) The use of an integrated risk assessment and categorization; c) Matching land acquisition planning requirements with the readiness of the technical design; d) Addressing impacts on livelihoods & other losses not caused by land acquisition; and e) Monitoring compliance with requirements for the mitigation of land acquisition and land use restriction (LA/LUR).

9. The discussion elicited highly important topics from participants like: (i) differentiated roles and responsibilities of borrowers and the ADB and the need for capacity-building; (ii) involuntary resettlement, livelihood restoration and compensation issues; (iii) stakeholder engagement, grievance redress, and accountability mechanisms; (iv) public disclosure and transparency; (v) effectivity date of the updated SPS; (vi) risk assessment and categorization; (vii) alignment of ADB's safeguards requirements with national laws and regulations; (viii) scope of policy application; (ix) strengthening of other provisions; (x) impacts not directly related to land acquisition, restriction of access, and involuntary resettlement; (xi) third-party monitoring; (xii) suggestions on nomenclature and definitions; and (xiii) safeguard policy gap between ADB and other MFIs.

10. Some of the participants observed that there is inadequate capacity within the project implementing units to carry out involuntary resettlement and land acquisition measures. Although ADB provides technical assistance, it is seen as short-term, ad hoc, or limited to the project's area of influence. It was suggested to place more emphasis on institutional strengthening.

11. On involuntary resettlement, livelihood restoration, and compensation, the specific issues raised include: (i) restoring and enhancing the livelihoods of all displaced persons relative to pre-project levels, and improving the standards of living of the displaced poor and other vulnerable groups; (ii) managing threats of violence and intimidation during land acquisition especially in conflict-affected countries; (iii) use of ADB project funds instead of government funds to finance mitigation (e.g., compensation or livelihood restoration program for affected persons (APs)); (iv) monitoring effectiveness of restoration/rehabilitation programs; (v) "top-ups" or additional support to displaced persons (e.g., livelihood or poverty allowances); and (vi) ensuring safeguards compliance for projects financed by multiple donors.

12. On stakeholder engagement, participants suggested measures to achieve better results from consultation, such as conducting a more in-depth analysis of affected people and their vulnerabilities at a very early stage of project preparation; seeking the help of communication specialists who will reach out to local stakeholders to facilitate their involvement in the resettlement process; and including CSO engagement to support the preparation of resettlement plans and monitor their implementation for both category A and B projects.

13. Procedural issues were raised on risk assessment and categorization. These include (i) providing clarity in the definition of Category A in resettlement; (ii) reviewing the current threshold of 200 affected people for Category A projects; (iii) identifying the various triggers to categorize IR impacts; and (iv) ensuring that there is no mis-categorization or under-categorization of resettlement impacts.

14. Stakeholders asked how ADB addresses resettlement issues when its policy differs from existing national laws and regulations. For example, participants asked for further clarity on the valuation process for determining replacement cost as the national valuation requirements may differ substantially from the replacement cost standard. The participants also discussed the

potential for engaging third-party monitors to assist in monitoring compliance with ADB safeguard systems. Additional suggestions included targeted engagement with civil society groups and ensuring timely monitoring to mitigate potential challenges.

15. In response, ADB staff acknowledged that the lack of continuity in client's capacity and staffing in the field may create problems in the implementation of projects. It was also pointed out that the designation of adequate project staff and making sure that they can effectively carry out their roles and responsibilities are primarily the responsibility of the implementing agencies. While ADB's preparatory and supervision teams flag capacity issues at the screening or scoping stage, capacity building support, through technical assistance projects, can be provided only upon the request of the borrower. In addition, it was indicated that the updated policy will further clarify the roles and responsibilities of borrowers and clients.

16. ADB is also working towards providing more clarity in the new safeguard policy on valuation, replacement cost, risk assessment and categorization. The requirements and guidance for strengthening ADB's and Client's processes related to due diligence, assessment and implementation of land acquisition, restriction of access, and involuntary resettlement in projects will have greater clarity. In cases where DMCs face budgetary constraints to finance land acquisition and resettlement costs, the updated policy and guidelines may include additional clarifications on the use of ADB funds to augment government resources used for involuntary land acquisition mitigation measures. On the issue of measures aimed to bridge the gaps between ADB's and national mitigation requirements, ADB's experience in many countries indicates that this concern can be resolved by looking into government policies and decrees, either at the national or agency level, that may allow for formalizing such gap-stopping measures to be implemented. This issue will be reviewed further and will entail continuing discussions to determine suitable approaches.

17. In terms of monitoring, participants were informed that ADB is in the process of developing an integrated safeguards management system which will enable capturing and reporting on safeguards data across its portfolio and to manage project safeguard issues more effectively. Moreover, provisions on circumstances for the need of external and third-party monitoring and verification will be further clarified in the new safeguard policy.

IV. EVALUATION AND WRAP UP

18. The moderated discussions were followed by quick evaluation sessions. In all three sessions, most participants gave a rating of 4 (effective) or 5 (highly effective), in 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.

19. 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. 06 December 2021: CSOs and other non-Governmental stakeholders in South Asia, and Central and West Asia
<https://events.development.asia/node/50556>
2. 07 December 2021: Government stakeholders in East Asia, Pacific, and Southeast Asia

<https://events.development.asia/node/50561>

3. 07 December 2021: Government session in South Asia, and Central and West Asia
<https://events.development.asia/node/50566>
4. 08 December 2021: CSOs and other non-Governmental stakeholders in East Asia, Pacific, and Southeast Asia
<https://events.development.asia/node/50571>
5. 08 December 2021: CSOs and other non-Governmental stakeholders in North America and Europe:
<https://events.development.asia/node/50576>

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. Scope of application

- Customary land owned by indigenous peoples (IPs) is not well clarified in the involuntary resettlement (IR) impact assessment. How will this be integrated in the 2009 Safeguard Policy Statement (SPS) update?
- Will the new safeguard policy affect the preparation of the resettlement plan for the ongoing railway project in the Philippines?
- Particularly on customary land, more guidance is needed on land scoping, land framework and land management plan. Guidance for contractors at specific stages of the project cycle is also needed.
- There is a need to ensure that land acquisition is truly voluntary and being implemented without threats of violence and coercion. Voluntary means of land acquisition, when done properly, is a good way of avoiding conflict, and a prerequisite to make this happen is a prior informed process of stakeholder participation.
- Not in favor of expanding IR policy to cover social impacts not related to involuntary land acquisition. IR policy should be limited to livelihood impacts only. It is extremely difficult to verify other losses not caused by land acquisition.

2. Risk assessment and categorization

- It would be good to see the clear statement/definition about Category A in resettlement. For instance, category A states 200 affected peoples (APs) physically displaced or loss of more than 10% productive assets. But how about affected households who have partial impact on residential households (who are losing residential land partially) but have existing land plots remaining. In this case, should they be included in the group of 200 APs?
- Please provide more details on the removal of numerical threshold of 200 APs. Is it just removal or substitution with some other threshold? A complete removal of any type of threshold may lead to a risk of under-categorization (also deliberate one). Category A for IR projects requires external monitoring, while for Category B projects, the involvement of external monitor is optional. Therefore, for many governments, simple removal of a threshold may become an excellent opportunity to get rid of external monitoring. This may lead to degradation of the quality of entitlements delivery, as internal monitoring (not being independent by its nature) cannot be a complete substitute for an external monitor. Therefore, unless ADB considers extending the requirement of obligatory external monitoring also to Category B for IR projects, there is a potential risk of corruption, harassment, etc.

- Categorization of projects/subprojects is quite vague because the types are only using A, B, and C categories. Is it possible to explore more on these issues, for instance, A+, A, A-, B+, B, B-, C+, C, C-? Is category B (positive impact) the same value as category B (negative impact)?
- There is a need to review various triggers to categorize IR impacts. In such a case where IR impact is small, but the environmental impact is category A, will this trigger require external monitoring?
- A land scoping study at feasibility stage would identify risks and unknowns and give the government and ADB something to move forward with. In the Pacific, having time and resources for social mapping and landowner identification studies during early stages would be a huge improvement.
- Guidance was sought on how to assess and approach issues concerning indirect impacts of land acquisition, particularly on their specific project that has been confronted with various issues.

3. Alignment of ADB's safeguards requirements with local laws and regulations

- How does ADB address resettlement issues when its policy differs from existing national laws and regulations?
- In the case of informal settlers, there are certain provisions in the domestic law that require displaced persons to submit proof of ownership to qualify for entitlements and/or monetary support from the government.
- There is a gap between ADB policy requirements and government policies at the local level. There is a need to do more consultations across all land administrators.
- There are instances when there are gaps between ADB policy and local regulations in terms of replacement costs in the context of land acquisition. What specific principles and/or procedures are being set up in the new policy for determining viable replacement cost?
- How does ADB deal with a situation wherein the actual practice of land acquisition varies greatly from what is written in the local legal regulations, as in the case of farmland sales in the People's Republic of China (PRC)? The experience and perspective are quite different, and it would be ideal to go deeper into the topic, perhaps in another session, where more evidence from the ground on these areas can be provided.

4. Involuntary resettlement, livelihood restoration and compensation issues

- While the ADB SPS calls for multiple resettlement plans, in the case of specific projects such as Cambodia Railway Project, the ADB has had a history of not choosing the resettlement plan model which best suited the needs of the displaced communities. It was the least cost option which was later selected. How can the new SPS ensure that the resettlement plans with the highest benefits and provisions of safeguarding will be selected?

- How is ADB implementing the two principles in the mitigation hierarchy namely, (i) avoiding IR, wherever possible; and (ii) minimizing IR by exploring project and design alternatives. While the Independent Evaluation Department (IED) study discussed a few project examples in Uzbekistan and Papua New Guinea, it provided limited insights regarding the issues. Any data on how ADB has exactly implemented its mitigation hierarchy across its investments?
- How is ADB managing issues concerning threats of violence and intimidation in land acquisition, especially in conflict-affected countries with no rule of law? These events cause grave impacts to livelihoods, and such events usually happen when a project is approved even without proper consultation and planning. How about escrow account provision? Is it possible to deposit the compensation payment in an account if it is getting delayed as a result of appeals by landowners?
- Can developing member countries (DMCs) use ADB project funds to finance compensation or livelihood restoration programs for affected persons instead of using the government budget?
- Restoration/rehabilitation programs (on-farm, off-farm and non-farm) did not work so well. For instance, resettlement locations are very far from the jobs of the affected households, thus requiring longer time for travel. One-time cash payment to the recipient is not enough and unsustainable.
- Is there an analytical study or a comprehensive report that looks at the long-term impacts of different land acquisition projects particularly on informal settlements in highly urbanized cities? This long-standing issue in the Philippines has greatly impacted the government's capacity in providing basic services such as water provision and waste management, among many others.
- On IR, there was a suggestion to look at other options, such as providing livelihood allowances, poverty allowances, etc. and possibly tapping project grants to deliver them (i.e., top-ups from the ADB funds).
- How can land acquisition disputes between the Ips and the developers be resolved to avoid unwanted clashes?
- A big issue in the Pacific is financing of compensation, whereby the compensation budget is not factored into the government budget cycle which means a delay to projects. It is unsure how and if the policy can grapple with this operational issue as it creates quite a bit of tension.
- Guidance was asked on how to assess and approach issues concerning indirect impacts of land acquisition, particularly on their specific project that has been confronted with various issues. A project in Yerevan, Armenia was cited where people were adversely affected by vibration issues emanating from construction activities in the project areas. While the implementers have already tried to address the problem through mitigation activities, the same problem persisted. The government had issues paying the required compensation because they insisted that the concern is not covered by the safeguard policy which explicitly states that only impacts directly resulting from land acquisition will be duly compensated. ADB was asked for some guidance on how this concern can be fully addressed.

5. Differentiated roles and responsibilities of borrowers and ADB and the need for capacity-building

- Based on a study, a significant number of ADB operations had issues with involuntary resettlement. A more stringent due diligence work should be made in terms of looking at country situations, and not merely rely on client reports as baseline data.
- Findings from a survey were shared, specifically on the review of some 2,000 projects with resettlement components. The study allegedly showed that close to a million people have been resettled under ADB projects. The required due diligence work needs to be done by ADB, instead of merely relying on the self-assessment report prepared by the clients.
- There are some issues concerning the institutional setup and the inadequate capacity of implementing units to carry out involuntary resettlement and land acquisition measures. There was a suggestion to include stricter monitoring measures on this in the updated policy.
- Mentoring and exchange program in the knowledge sharing and capacity building activities of ADB can be considered. The exchange program can be done by providing opportunities for staff belonging to different organizations to swap and interact with counterparts from different countries. This arrangement is deemed as a good approach to promote sharing of knowledge, experiences and lessons learned in various country contexts. On technical assistance projects (TA), concerns were raised on the “ad hoc” nature of such assistance projects and there was suggestion that the ultimate goal should be institutional strengthening and not just capacity building, since this only offers short-term solutions.
- Having clearer guidelines on vulnerable groups and mitigation approaches was suggested, as well as having more capacity building for ministries and project implementation units (PIU) in these areas.
- How will safeguards be implemented with projects that are co-financed by multiple donors?
- There was a query on how to incorporate the World Bank policy with the ADB policy since gap has been identified.

6. Impacts not directly related to land acquisition, restriction of access and involuntary resettlement

- If the social risks (adverse impacts) which do not originate from IR should be covered and mitigated by environmental safeguards, how should they be assessed at what project stage, and by which tools? How should these activities be synchronized with mitigation measures implemented by the social safeguard team?
- A certain scenario was cited wherein the road traffic was diverted to the new roads built under a project. As a result, businesses located on the old roads suffered losses. While the idea of covering livelihood impacts not caused by land acquisition is supported, this can add further costs for Land Acquisition and Resettlement Plan (LARP) implementation, which may render the project to be economically unjustified.

- What types of livelihood impacts fall within the category of those “not directly caused by land acquisition”? Clarity was sought if such impacts would also extend to climate-induced resettlement that was perpetuated by the existence of the project in the area.
- On addressing livelihood issues not caused by land acquisition, the hydropower and waterway projects of ADB were cited, and how these can pose major risks to communities and the environment was asked.

7. Stakeholder consultation and grievance redress mechanism

- Measures were proposed to help achieve better results of consultation. First, conduct a more in-depth analysis of people and their vulnerabilities at a very early stage of project preparation. Second is to solicit the help of communication specialists who will reach out to local stakeholders. These measures may help to facilitate the resettlement process.
- Holding focused group discussions (FGD) was recommended during the consultations and including civil society organization (CSO) engagement as part of the requirements for resettlement plan preparation and implementation was suggested, especially for category A and B projects.
- There was a suggestion to shift the focus from grievance redress mechanism (GRM) to a more holistic stakeholder engagement that needs to be continued throughout the project.
- A hydropower project in Nepal was cited that had environmental and social impacts particularly on the marginalized IPs in the project areas who depend entirely on the rivers for their livelihood. Since these ecosystems are interlinked, there has also been considerable impacts on agriculture, fishing, fuel wood and fodder collection. The project also had issues related to the failure of the technical design of the project to adequately measure the inundation zone, which is now impacting on another vulnerable community that was not essentially identified by the socio-economic survey. The said community did not receive any compensation related to the project and now, they are also facing risks to their livelihoods. With the new policy currently underway, how can that affect other active projects of ADB which were implemented following the 2009 safeguard policy?
- In terms of disclosure, a more careful discretion and respect for people’s privacy is needed to keep the communities (i.e., beneficiary households receiving IR compensation) safe and protected.

8. Third-party monitoring

- Monitoring compliance with agreed resettlement plans is not an issue, but disclosure of reports is important.
- An ADB project in Cambodia had issues on resettlement and livelihood impacts. The problems faced by the project resonated the IED recommendations particularly on weaknesses in terms of livelihood restoration and improvement. While ADB eventually took some corrective measures by carrying out livelihood training programs, resettlement audit, and providing compensation to affected households, the delay resulted to people having to take out personal loans or sell portions of the lands where they were relocated

just to survive. The timeliness of the livelihood support as being a very crucial component of the safeguards policy should be considered.

- What is the selection process in hiring third-party monitoring specialists? ADB should engage civil society groups in the region to identify groups who could provide adequate support for monitoring and documentation.
- On engaging third-party monitors who will assess and verify involuntary resettlement and land acquisition activities, over-reliance on consultants is not the best option. Such arrangements could lead to a lack of transparency, coherence, and institutional memory that is very crucial to implementing safeguard policies.

9. Strengthening of other provisions (e.g., valuation for land compensation)

- Are there any clear guidelines in the revised policy on mechanism of valuation for land compensation to meet the principle of fair market value for land? If not, then there must be clear expression regarding acceptability of country's legal or executive system on this matter.
- ADB needs to provide mentoring as part of an exchange program among ADB's DMCs, so they learn from other countries' experiences. There should be a focus on institutional strengthening.
- For individuals who are displaced by natural events such as tidal surges, what are the resettlement plans for such people? Are there resettlement policies covering individuals who are displaced by such events?
- Will the new policy have provisions and/or guidance for other groups of affected people with undocumented rights to land and resources, such as those with customary tenure, communal tenure, people with lack of legal documentation for land, and land in conflict?
- The application of addressing impacts of land and livelihood loss, including monitoring compliance seems relatively straightforward in relation to projects that are directly financed by the ADB. There is an upcoming session on financial intermediaries (FI) and would be interested on how these standards are applied stringently and in a binding manner for projects supported via FI modality.

10. Suggestions on nomenclature

- Revision was proposed to the clause from the SPS which states that "LARP has to be approved by the government." The term government may be misconstrued to mean "cabinet of ministers" which may prolong the approval process. Revise the clause to "responsible government agency" to facilitate prompt approval process.
- There is much confusion about the "inventory of losses" and "detailed measurement survey." The policy is also not very clear in terms of their differences and at what scenarios can they be applied. Replace these terms with more straightforward terms (as applicable) in the new policy.

- A separate standard for resettlement in the new policy was suggested (i.e. bearing the same title) and not just mentioning it within the overall framework of land acquisition and land restrictions.