

19 February 2020

Mark Dennis Y.C. Joven

Member of the Board of Directors
Asian Infrastructure Investment Bank (AIIB)

Cc:

Dr. Joachim von Amsberg

Vice – President – Policy and Strategy

DG Hamid Sharif

Complaints - Resolution, Evaluation and Integrity Unit (CEIU)

Re: Request to Extend the Deadline for the Phase 1 ESF Consultation

Dear Dir. Joven,

This letter strongly urges your office to delay the phase 1 of the Environmental and Social Framework (ESF) review consultation as articulated on the AIIB website January 2020. As CSOs who have extensively participated in the bank's consultation process in the past, we have not yet received a formal response in terms of the approach for this review from the ESF drafting team and AIIB Management.

Considering that there is a relatively small volume of projects approved and implemented since 2016, we expected the AIIB to describe its theoretical approach and methodology on how it will conduct this critical review of its ESF vis - a vis complementing its 3 year project portfolio. Several critical questions remain: Given that the AIIB has approved over 60 projects, will the bank evaluate the extent to which they all adhered to ESF requirements? Will the AIIB evaluate its ESF delivery in relation to its time bound information disclosure requirements pertaining to the projects? Will the bank conduct (or have conducted) any internal evaluations on operational delivery of its ESF to gather lessons learnt since 2016? Without having a clear sense on how the AIIB is approaching the scope of this ESF review it seems that the process for soliciting inputs is being too rushed.

It also needs to be noted that the consultation notice on the AIIB website was released mid - January with inputs being requested as near as 28 February 2020, which is extremely short notice for garnering informed, constructive and useful inputs to the ESF review. We have been actively monitoring AIIB standalone and co-financed projects extensively on the ground over the last 3 years and providing detailed inputs on ground realities on these projects will require more time for analysis and review of field data and researched material.

It needs to be mentioned that on the 9th of March 2020, there is a scheduled ESF workshop to be organized by the German government with the AIIB Eurozone and Wider Europe government shareholders. Thus the 28 February input deadline would disallow for the important outcomes of this workshop to be integrated into the Phase One consultation.

Considering the above mentioned concerns we urge the bank to provide us it's theoretical and methodological approach towards this ESF review and extend the Phase 1 deadline until the **end of March 2020**. We look forward to your utmost cooperation in this regard and are waiting to hear back from you at your earliest convenience.

Thank you.

Sincerely,



Rayyan Hassan
Executive Director
NGO Forum on ADB

Endorsed by the following organizations:

Accountability Counsel, USA

Aksi!, Indonesia

Armenian Women for Health and Healthy Environment /AWHHE/, Armenia

Bangladesh Working Group on External Debt (BWGED), Bangladesh

BothENDS, The Netherlands

Centre for Environmental Justice, Sri Lanka

Centre for Human Rights and Development, Mongolia

Coastal Livelihood and Environmental Action Network (CLEAN), Bangladesh

Community Empowerment and Social Justice Network (CEMSOJ), Nepal

Friends of the Earth US, USA

Green Advocates International, Liberia

Inclusive Development International, USA

Initiative for Right View, Bangladesh

International Accountability Project, USA/Global

International Center For Not- For- Profit Law, Tajikistan

MiningWatch Canada, Canada

NGO Forum Cambodia, Cambodia

OXFAM, Hong Kong

Progressive Plantation Workers Union (PPWU), India

Recourse, The Netherlands/Global

Safety and Rights Society, Bangladesh

VedvarendeEnergi, Denmark

WomanHealth Philippines, Philippines

Youth For Environment Education And Development Foundation (YFEED Foundation),

Nepal

Youth Group on Protection of Environment, Tajikistan