RECOURSE
Making finance accountable to people and planet

RECOURSE SUBMISSION TO ADB'S ENERGY POLICY REVIEW

COMMENTS ON WORKING PAPER: AUGUST 2021

Introduction

Recourse welcomes this opportunity to provide input to the August 2021 Working Paper as part of the Asian Development Bank's (ADB's) review of its draft revised Energy Policy. Recourse is a Netherlands-based civil society organisation, working for a world where people and planet are at the heart of development. We campaign to redirect international financial flows away from dirty, harmful investments, towards greener and more inclusive development, working with partners around the world to hold financial institutions accountable.

This submission is an update to our earlier submission to the review in June 2021, responding to the first draft policy document. We repeat our call for the revised Energy Policy to be fossil free and climate proof, and for ADB to play a leadership role in shifting the trajectory of development finance toward a more sustainable path, building on efforts to align with the Paris Agreement and its 1.5°C aspiration.

Please note that this submission focuses on Recourse's areas of expertise and is not comprehensive in terms of its coverage of issues and recommendations. It should be read in conjunction with other inputs, in particular those of civil society and indigenous peoples' organisations in Asia. We remain concerned about the consultation's lack of outreach in Asia and strongly encourage this to be rectified as a matter of urgency, including efforts to reach affected communities for their input and views.

Paris alignment and the 1.5°C goal

While including several references to the Paris Agreement, it is disappointing that the revised draft policy continues to exclude any mention of the 1.5°C goal. The FAQ, released by ADB in mid July, does not clarify this omission, but responds that this goal can only be achieved through international collaboration. However, this is not a valid reason for not spelling it out and making it clear to DMCs and others what the joint ambition should be; and as a multilateral bank, international collaboration should be at the heart of ADB's purpose. This is a big omission, indicating a reluctance for ADB's interventions to be monitored or measured and for the ADB to be held accountable for any of its commitments.

The urgency to strengthen the policy and commit to this goal has never been clearer. IPCC's latest report, dedicated specifically to the 1.5°C goal, warns that this threshold could already be breached within 20 years and calls for an immediate strengthened global response. A number of ADB shareholders have ramped up their commitments for a fossil fuel free future in recent years, including those determining their engagement in MDBs, most significantly the US new guidance on fossil fuels for MDBs, as well as the UK's new Export Finance Policy. Other MDBs have also strengthened their policies, for example the European Investment Bank (EIB) is moving towards a near full exclusion of fossil fuels.

According to ADB's draft Energy Policy, "in 2019, about 50% of global CO2 emissions from fossil fuel (coal, oil, and natural gas) combustion was from Asia and the Pacific". Furthermore, after a temporary decrease in CO2 emissions during the first year of the Covid pandemic, new research shows that power sector emissions in 2021 were even higher than in 2019, with a large part of the increase coming from Asia. In its 2020 review of the Energy Policy, ADB's Independent Evaluation Department (IED) found that ADB "is no longer adequately aligned with the global consensus on climate change". It is vital that ADB steps up its game on all levels, including the Energy Policy, to ensure it is at the front of climate ambition rather than lagging behind.

Ambitious timelines and targets should be part of this commitment. Significantly, the policy lacks explicit targets on what ADB aims to achieve in terms of GHG emission reductions, clean renewable energy support, and on energy access, to name a few. This must also include a clear timeframe for another review of the Energy Policy, to enable it to respond in an effective and timely manner to early lessons learned as well as future research and climate policy developments. As it currently stands, ADB promises the next review only in 2025, which is too far in the future given the urgent need to address climate change. This is despite ADB recognising in the draft Energy Policy the IED's recommendation that "guidance on energy sector operations [should] be updated more frequently" (para 34). ADB does commit to update guidance notes as relevant, however, as clarified in the FAQ, these updates will not be public and will thus lack in vital input from stakeholders.

In terms of clean renewable energy, it is worrying that ADB continues to count large hydropower within the parameters of "sustainable hydropower". The FAQ refers to internal staff guidance documents which will address "issues related to processing large hydropower proposals", but this is not included in the policy and is thus outside of public scrutiny. In the FAQ ADB also fails to rule out support for greenfield hydropower, instead taking a "selective" approach, arguing that it will "carefully assess the possible negative impacts". However, without access to the guidance it will be impossible to scrutinise whether these assessments are indeed sufficient to avoid and mitigate negative social and environmental impacts.

RECOMMENDATIONS:

- The policy must explicitly spell out ADB's commitment to align all its activities with the Paris Agreement's 1.5°C goal.
- ADB should commit to reviewing the energy policy by 2023, to assess whether its implementation has achieved results in line with the 1.5°C goal of the Paris Agreement.
- Large hydropower should be removed from the list of "sustainable hydropower", In addition, ADB must publish the draft hydropower guidance note and open it for public consultation.

Coal financing

Recourse welcomes the ADB's exclusion of support for coal remaining in the updated draft. It is encouraging that the coal exclusion language is expanded beyond coal mining and coal-fired power generation, to also include "processing, storage, and transportation". To further strengthen the commitment, it should add language that more explicitly addresses infrastructure associated with coal, so that ADB does not indirectly subsidising continued coal use. The draft retains the commitment to not support cross border transmission lines linked to coal power, which is positive.

We reiterate that any loopholes that allow for potential support for coal must be closed. It is welcome that the policy now clarifies that funding through financial intermediaries (FIs) is covered by the policy. This is important, since FIs have undermined coal restrictions at other institutions, in particular the World Bank's private sector arm, the International Finance Corporation (IFC). In its review of the Energy Policy, IED argued that ADB in practice has not financed coal since 2013, but this assessment excluded financing through financial intermediaries (FIs). This loophole was acknowledged by Yongping Zhai, then Chief of the Energy Sector Group, who admitted that ADB may have financed coal through FIs, since 2013.[1] See further detail on FIs below. Another loophole is industrial emissions, also discussed further below.

More clarification is also required regarding how ADB will address current and legacy coal project investment, including clear timelines. While we welcome ADB's commitment to support a "just transition" the language is weak and fails to reference international commitments through, for example, ILO conventions and international rights-based standards, including free prior and informed consent of Indigenous Peoples and ethnic minorities. This must be addressed for ADB's commitment to be meaningful.

RECOMMENDATIONS:

- ADB's coal exclusion should encompass coal-related infrastructure. An example is this language from IFC's Interpretation Note on implementation of FI investments: "IFC will exclude coal related sub-projects including coal mining, coal transportation or coal-fired power plants, as well as infrastructure services exclusively dedicated to support any of these activities."
- Any loopholes for coal support must be closed, including for indirect finance, such as through FIs and policy lending, and industrial use of coal.
- The policy must clarify how ADB will address its current and legacy coal project investments.
- The language on a "just transition" must be strengthened and include references to international rights-based standards.

Fossil fuels for industrial use

GHG emissions derived from industrial use of fossil fuels is often neglected, despite accounting for over a fifth of direct of direct global GHG emissions in 2010. It is encouraging that ADB references the significance and specific context of industrial emissions in the revised draft and include a specific section on decarbonisation of industrial processes. However, there is no timeline for this commitment and there is also no clear direction for investments in fossil fuel reliant industrial processes, apart

[1] Personal notes, ADB North America Energy Policy Consultation, 9 June 2021

from a commitment to "support carbon capture, utilisation and storage for power plants and industries", but this is a costly and unproven technology (see below). Investments would be better directed to development of alternative more sustainable and renewable sources of fuel. It is also welcome that the language on ceasing coal support (para 74) does not explicitly exclude industrial use of coal, however by referring to coal power and heat, it de facto exclude many carbon intensive industrial processes using coal, such as cement and steel production. It is also concerning that language on industrial use of gas is now spelled out as one of the possible exclusions for gas investments.

RECOMMENDATION:

- ADB should strengthen its position on exclusion of coal to extend to industrial uses and commit to a timeline for phasing out all fossil fuels. This should include support for development of low-carbon alternatives that are not relying on unproven and costly technologies. For example, EIB commits to "intensify its continuing efforts to support accelerated investment in areas that require large volumes of long term and low cost capital – including … deployment of low carbon technologies by industry."

Natural gas

Despite growing evidence of the dangers of unabated support for gas, it continues to feature strongly in the draft policy, paving way for continued financing of gas projects with only limited exceptions. According to research by Oil Change International, ADB has financed at least $4.9 billion in fossil fuels since the Paris Agreement, nearly all of which is gas. Moreover, from 2016-20 ADB approved $11.1 million in technical assistance, supporting governments to build gas pipelines, power plants and LNG terminals across Asia.

ADB's draft policy states that it will cease support for "any natural gas exploration and drilling activities" and "be selective in its support for midstream and downstream natural gas." The relevant paragraph has been remodelled to start with examples of what gas projects ADB will continue to fund in more detail. This includes investments in natural gas infrastructure, such as "gas T&D pipelines, liquefied natural gas terminals, and storage facilities", as well as natural gas-based end-use facilities, with a commitment for these to assessed against a "set of screening criteria consistent with the Paris Agreement", but without specifying if these are the criteria currently developed in a joint MDB initiative are or how they will be developed, by who and by when. It is important to note that the MDB criteria to date have not been opened up for public consultation.

In addition to these "screening criteria", the draft policy allows gas support building on "evidence" of emissions reduction and that projects can demonstrate pollution displacement. However, both use other fossil fuels - coal and oil - as comparators rather than renewable energy. Three more specific conditions are listed, referencing, for example, a "comparable scale" against which to measure services of gas vs low-carbon or zero-carbon technology, however, the policy does not define what this scale is and how it will be used.

The draft provides no further detailed information to fully understand how the case for gas will be measured, and instead refers to guidance notes to be issued to staff. In the FAQ ADB confirms that the gas guidance note will be 'internal' and developed separately to the Energy Policy, since the Board will approve the criteria and they "are thus subject to change". This argument seems counterintuitive, justifying more not less reason for public scrutiny.

To explain the continued focus on gas, in the FAQ ADB argues that the feedback on gas was "divided" and that gas GHG emissions are in any case "substantially lower than coal". However, this ignores scientific evidence, including that gas, rather than coal, has been driving the global increase in CO2 emissions since 2013, according to analysis by Carbon Brief. IISD concludes that in most countries and cases the majority of gas consumption is associated with uses that already have cost-competitive clean alternatives. According to the International Energy Agency's latest analysis "there is no need for investments in new fossil fuel supply". IEA does not only call for no more investments in coal, but also "no new oil and natural gas", in order for the world to achieve the Paris Agreement's ambition to limit the long-term increase in average global temperateness to 1.5°C.

It also ignores ADB's own analysis in the revised draft, which, for example, states that "natural gas has historically been seen as an important alternative to reduce emissions from coal and balance variable renewable generation, *but emerging technology options have increased the alternatives available to achieve these same results*" (our emphasis); mentions the problem of GHG emissions linked to gas; and notes the "large capital investments" required for liquefied natural gas terminals and gas T&D (para 29).

In the FAQ ADB acknowledges that indirect GHG emission of production and transmission "are responsible for a significant share of global methane emissions" (this language is modified and weakened in the revised draft, referring to a "meaningful share"). Regardless of this, ADB will not require assessments of methane leakage, instead committing to revisiting this issue "at a later stage" when the new policy gets reviewed – however, the review is not scheduled until 2025, too late given the urgent need to address climate change by rapidly phasing out fossil fuels.

Listening to the evidence, other IFIs are increasingly taking a stricter approach to gas. According to analysis by the Fossil Free ADB coalition, they seek to exclude gas through different elements:

> "(a) a stronger climate test that requires showing alternatives to gas are not *viable* rather than just more expensive (e.g. UK and FMO, the Dutch development bank)
> (b) strict emissions standards (e.g. EIB has a power generation standard for all projects of less than 250 grammes of CO2 per kilowatt-hour), and/or
> (c) a shadow cost of carbon aligned with the upper end of the High-Level Commission on Carbon Prices (e.g. EIB currently employs a shadow cost of carbon of €80, set to rise rapidly)."

This continued support for gas is disappointing and a lost opportunity for ADB to become a climate leader. Instead it sets itself out to be a laggard, in contrast to, for example, EIB, which has committed to end support for unabated fossil fuels, including gas, already by end of 2021.

RECOMMENDATIONS:

- ADB should commit to phasing out oil and gas with a clear timeline, in line with MDB best practice, such as recent commitments by EIB. The phase out should extend to midstream and downstream gas financing and support, as well as associated facilities. Gas should also be excluded as an option for reengineering existing coal-fired power plants.

- ADB must publish its gas guidance note as part of the energy policy review. It is not possible for stakeholders to assess the policy meaningfully if key details are missing on how it will be applied, including considerations and standards for selecting projects and assurances that mechanisms will be in place to avert reprisals against affected communities.

Energy access

It is welcome that the revised draft identifies energy access as a theme in its own right: this is an improvement. Access to energy continues to be a challenge for communities around the world. Globally, almost 800 million people lack electricity and 2.8 billion clean cooking, according to a 2020 report by Sustainable Energy for All, figures that are likely to increase due to the impacts of the Covid-19 pandemic.

We welcome the draft's continued emphasis on Sustainable Development Goal (SDG) 7 on universal access to affordable, reliable, sustainable, and modern energy, including efforts to reach the "last-mile" households. However, it is crucial that access to energy is not addressed at the expense of the climate by supporting fossil fuels, including through indirect finance and support for fossil fuels linked infrastructure, such as transmission and distribution systems. Sustainable Energy for All's 2020 review of 27 countries in Africa and Asia found that much of the increase in commitments to fund universal energy access was for fossil fuel technologies "which will lock those [countries] into decades of carbon emissions", as well as risk becoming stranded assets.

RECOMMENDATIONS:

- Energy access for all should be achieved through investments in clean, renewable energy solutions, both utility scale and distributed renewable energy. Given the rapidly growing climate crisis, ADB's public money for energy access should not fund fossil fuels, locking countries into decades of carbon emissions, dependence on imports of coal and other fossil fuels, as well as stranded asset risks.

Energy access targets: Overall, language on specific targets is still lacking in the revised draft. In the FAQ, ADB refers to the Country Partnership Strategies as the main vehicle for ADB to work with DMCs to "prepare, revise, and update their electrification and rural energy plans", as well as implementation: "In this context, ADB pursues coherent, prioritized, and time-bound targets and implementation strategies for energy access. This includes identifying appropriate targets for the last-mile connections, women, minorities, and vulnerable groups based on the DMC's specific circumstances." While this is positive, ADB should set out sector wide targets for energy access, indicating ambition as well as both transparency and accountability, that can also guide the Country Partnership Strategies. Equally, ADB must be clear on the metrics it uses to meet such targets – prioritising additional household connections over kilowatts generated, for example. ADB should be driving change, sending clear signals to DMCs on the desired trajectory. For example, the African Development Bank has a target of 75 million new off-grid connections for rural households and small businesses by 2025.

RECOMMENDATIONS:

- ADB must specify clear targets and timelines for its contribution to achieving energy access for all, including sub-targets for gender and vulnerable groups. ADB should communicate and report on these targets in an open and transparent manner.
- ADB must accelerate electrification rates in all high energy access deficit countries by providing significantly more finance directly to new household energy connection. Metrics measuring energy access must both count meaningful connections and provide disaggregated data on which communities were reached. ADB should commit to match or exceed the AfDB's new connections pledge and to avoid double counting.

Inclusivity and stakeholder engagement: Lack of access to energy is undermining gender equality. Sustainable Energy for All concludes that a lack of energy access "disproportionally affects women and girls in the form of health, productivity, unpaid labour, and employment burdens." It is therefore welcome that the revised draft more clearly identifies gender linkages, both related to energy access and more broadly. We particularly welcome the introduction of a specific section on promoting gender equality (para 57), including requirements for gender analysis, collection of sex-disaggregated data and gender mainstreaming. However, it is missing further specific guidance, which was promised in the FAQ, and as a result in places gender language is used in a tokenistic rather than constructive and committal manner.

In a new section, ADB commits to promoting "inclusiveness in energy access activities" (para 56), however, the language only requires the ADB to "factor in" and "consider" the needs of, for example, women and vulnerable groups, rather than engaging and consulting. The new section only refers to directly involving communities when it comes to the execution of projects, which would be too late to ensure all views and eventualities are covered. The earlier draft policy called for "the voices of vulnerable groups, minorities, and refugees" to be heard in "transparent, impartial, and socially sensitive multi-criteria analysis". However, in the revised draft it is clarified that all such requirements fall under the DMCs, and are thus not a requirement from ADB. Without compulsory wording and clear guidance it is unlikely that these commitments will be met in a sufficient manner.

<u>RECOMMENDATIONS:</u>

- ADB should develop the guidance on gender equality in its energy sector operations, referred to in the FAQ, in an open and transparent manner.
- ADB should require energy access options analysis, with clear guidelines, to ensure the needs of vulnerable groups and 'last-mile' communities are prioritised.
- Community consultation and participation should be compulsory when determining prioritisation of end-uses of grid systems and for organising the system.

Public vs private sector: Language from the earlier draft policy recognising the importance of "strong public sector support" has now disappeared, which is a grave omission. Instead, language on private sector initiatives, market-based approaches and PPPs features even more strongly, including a dedicated section on increasing private sector participation (para 45-47). The draft also commits to support "increased competition and private sector participation in DMCs' energy markets", building on the perception that private sector participation generally leads to increased efficiency on all levels, including being more responsive to "customer needs". This is in line with ADB's commitment to increase private sector lending to a third of its portfolio by 2025, but it is a risky strategy for energy access in particular. While private sector and market-based approaches can have a role to play in certain circumstances, there must be clear requirements to secure affordability and reach of low-income and vulnerable communities lacking electricity and clean cooking access, particularly important to women.

RECOMMENDATION:

- Financing mechanisms should focus on affordability and reach for those most vulnerable, rather than a bias for private sector and market-based options. This is where a strong role for public finance and the public sector is required, and ADB must retain that focus.

Financial intermediaries

It is very welcome that ADB recognises that the draft energy policy must apply across all instruments, including direct and indirect financing – which responds to one of Recourse's key demands from phase one of the consultation: "This proposed policy applies to all of ADB's sovereign and non-sovereign operations, including project loans, sector loans, policy-based loans, results-based loans, financial intermediary loans, equity participation, and technical assistance."

However, there are concerns specific to financial intermediary (FI) finance that the draft does not adequately address. As noted in our first submission, while investing in FIs can help to mobilise funds and attract private capital for economic development, this form of third-party or 'hands-off' lending also comes with significant risks - in particular around clients' adherence to E&S safeguards. In recent years, IFC - over 50 per cent of whose investment portfolio is to FIs - has been forced to acknowledge these risks and has taken some steps to address them. Following critical findings from both IFC's own watchdog, and from civil society groups, IFC has reduced high-risk lending through FIs, no longer provides general-purpose loans, and has developed a 'Green Equity Approach' to help to transform not only its own lending but that of its FI equity clients, to phase out coal to zero by 2030.

Transparency: The draft states that it will enhance transparency in FI investing (para 88): ADB "will provide direct financing to companies, banks, financial intermediaries, and projects that increase clean energy and energy efficiency in the region … Through these activities, ADB will promote sustainability, integrity and transparency".

However, transparency remains a fundamental problem for the ADB's FI lending. Of ADB's $6 billion in FI loans, guarantees and equity investments to 86 clients from 2009 to the present, only one investment provides information about where the money actually ends up.[2] At a minimum, the name, sector and location of higher risk (Category A and B) subprojects financed through intermediaries should be disclosed, to enable accurate tracking of the climate impact of ADB's FI portfolio. As documented in our first submission to this consultation, Recourse examined all 86 of ADB's FI investments and nearly every single one had vital social and environmental information withheld. This is unacceptable and lagging behind current good practice[3]; and also makes it impossible for civil society to be able to track and monitor the implementation of any climate commitments ADB may

[2] This is ADB's 2018 investment in Creador, a private equity fund. ADB discloses information about every sub project financed through Creador; see: https://www.adb.org/projects/52067-001/main#project-activities

[3] For examples of good practice on transparency at other DFIs, see https://www.re-course.org/wp-content/uploads/2021/03/Submission-to-European-Investment-Bank-review-of-its-Transparency-Policy.pdf

make. In relation to the energy policy, the concern is that money invested through FIs could end up supporting fossil fuels by the back door.

On a positive note, ADB itself has demonstrated in practice that such disclosure is possible: it's investment in Creador private equity fund in 2018 is a model of good practice, disclosing not only the name of sub-investments on ADB's website, but also a summary of the investment purpose and risk categorisation.

RECOMMENDATION:

- ADB must publish the name, sector and location of all high and medium risk projects it supports through FIs, to enable public tracking and assessment of ADB's fossil fuel commitments. Without transparency reforms, there is no way for the general public to know if FI money, which is ultimately public funds, is going to coal and other fossil fuels.

Support for fossil fuels: As documented in our first submission, this transparency is key since in our research we found several FI investments in ADB's portfolio that raised red flags – possibly indicating exposure to fossil fuels.

So while it is promising that the draft promises a focus on using FIs to support energy access and renewable energy (para 107): "Results-based lending and financial intermediation lending can be appropriate modalities for investment programs that increase energy access, reduce emissions, or increase the share of renewable energy", the risk of FI investments ending up supporting fossil fuels is not sufficiently addressed in this latest draft and must be more emphatically spelled out.

For example, it is concerning that the new draft proposes a role for ADB in support for trade in oil: "ADB may, however, continue providing guarantees and loans to partner banks in DMCs that support the international trade and supply chains, which may involve trading in oil to support the immediate flows required to keep economies running in a few countries where there is little private sector support for such import risk."

ADB should take a precautionary approach and assume such support will not feature in MDBs' approach to aligning with the Paris Agreement – waiting for this to happen is no excuse to continue until it does: "This support may be extended until coordination between multilateral development banks produces a shared approach to trade and supply chain financing in line with the Paris Agreement."

RECOMMENDATIONS:

- ADB must include robust exclusions for fossil fuels – including coal, oil and gas – that apply to both its direct and indirect lending; and includes associated facilities and infrastructure such as transmission lines, roads, and ports. As ADB emphasises increasing support for the private sector and as it switches its support from coal to gas, the risks from FI investments leaking to fossil fuels will only grow, so action is needed to address this in ADB's new Energy Policy.

Energy access through intermediaries: A positive use of FI lending can be the bundling and promotion of smaller, hard to finance projects; so it is encouraging to see ADB's focus on this progressive use of intermediated finance (para 108): *"ADB will use financial intermediation as an approach to supporting dispersed subprojects.* Financial intermediation loans can be used for rural electrification, clean cooking, island energy supply, demand-side energy efficiency programs, and other programs that are not amenable to project loans or other investment modalities. ADB will apply the financial intermediation modality partnering with national banks and specialized financial institutions." Choosing the right financial partners, with experience in meeting the needs and priorities of vulnerable and marginalised communities, and who comply with ADB's development mandate, will be key to this intention's success.

<u>RECOMMENDATION:</u>

- ADB's selection of FI clients should be prioritised towards institutions that have substantial local ownership and are equipped to make investments that are in line with ADB's development objectives and approach.

Untested technologies

The revised policy continues to a large extent relies on unproven and 'emerging' technologies, as viable options to address climate change – a dangerous strategy, that also risks displacing investments urgently needed in the shift away from fossil fuels to renewable energy. For example, according to the draft policy ADB "will support carbon capture, utilisation and storage investments for power plants and industries." However, a growing body of evidence questions support for Carbon Capture Utilisation and Storage (CCUS) or 'blue hydrogen' or any hydrogen produced using fossil fuels. For example, a 2021 report by the Tyndall Centre for Climate Change Research demonstrates that carbon capture and storage perpetuates the use of fossil fuels. Resources are far better targeted at sustainable renewable energy solutions.

RECOMMENDATION:

- ADB's fossil fuel exclusions should extend to fossil fuel projects utilising carbon capture and storage given these rely on unproven and expensive technologies, which can divert public finance away from a just transition to renewable energy.

Energy Policy consultation

The draft rightly refers to the importance "meaningful consultation" about energy projects, to empower communities, paying particular attention to those disadvantaged and vulnerable. It is therefore particularly concerning that the Energy Policy consultation has not adhered to any of these principles, undermining the trust in ADB's stakeholder engagement on all levels – from local to international – including on how ADB interprets "meaningful consultation" in practice. There have been some improvements to the consultation process in the past couple of months, including publication of a basic timeline, the summary of comments from stakeholders and the FAQ. However, much remains outstanding and the process continues to fall far behind best practice. Significantly, outreach about the consultation has been minimal and there is no information about upcoming or held consultation meetings, which makes it impossible for stakeholders to be informed and plan their engagement, nor are translated versions available. This is particularly concerning, as affected communities and local civil society are unlikely to be reached and therefore unable to contribute with vital input. There is also not a dedicated email for submissions, just a comment box which does not allow for in text links or separate attachments.

RECOMMENDATIONS:

- ADB must ensure that information about the Energy Policy review is easily accessible on its website and comprehensive, including translations into relevant languages.
- Future reviews, including on the Energy Policy (no later than 2023) and on guidance notes, should be public, with clear processes and timelines that are communicated widely to relevant stakeholders in relevant languages in a timely manner.
- ADB should organise dedicated consultations to collect input from impacted communities and civil society organisations based in the region with translation available and clear public information on how to participate. At a minimum, accessible and participatory online civil society input sessions should be scheduled for groups within Central, South and South East Asia as well as the Pacific.
- To ensure full participation for civil society groups that may risk reprisals for giving input, submissions via a digitally encrypted platform should be enabled on ADB's website.