

*Via electronic email*

**Dr. Joachim von Amsberg**

Vice - President, Policy and Strategy  
Asian Infrastructure Investment Bank (AIIB)  
B9 Financial Street Xicheng District  
Beijing 10033  
People's Republic of China

24 June 2019

**Re: CSOs' request for a meaningful dialogue in the Annual Meeting**

Dear Mr. von Amsberg,

It was good meeting you and having interesting discussions in Berlin, Germany.

In our meeting we discussed several concerns about the Environmental and Social Framework (ESF), its link to the Policy on Public Information (PPI) and the problems we face in monitoring a number of AIIB-funded projects. The challenges we encounter in dealing with these projects also depend on whether the said project is co-financed with another multilateral development bank, a standalone project, or if it involves financial intermediation.

Although we value having this discussion with you, as European civil society groups, we are of the strong belief that our meeting in Berlin, a similar one in London or elsewhere are not a proper substitute for a genuine and meaningful dialogue on these topics at the Annual Meeting. It is striking to note that CSOs from regional member states are encountering hurdles to meaningful interaction with AIIB Senior- or Mid-level Management.

In view of the foregoing and on behalf of the 20 signatories from civil society organizations, **we would like to request a meeting with you in Luxembourg on the following topics:**

**1. Implementation and review of the ESF**

The ESF provides that, "Based on the experience gained from the application of the ESP and ESSs to individual projects *during the first three years of the Bank's operation*, the Bank will, at the end of this period, *conduct a review of the overall ESF* (para. 4, ESF) [Emphasis added]." We would like the AIIB to disclose an Approach Paper similar to the practices of other multilateral development banks (MDBs) in carrying out an evaluation or review process for a critical policy document. This Approach Paper would determine the timeline, methodology and scope of the review process. Given its importance to ensuring a genuinely open and consultative process, we would also request the Bank to consider CSO inputs as early as possible in the drafting of this Approach Paper and ensure a meaningful consultation process thereafter.

## 2. Policy gaps arising from significant concerns about AIIB-funded projects

CSOs have consistently requested more in-depth meetings with Project Team Leaders during the Annual Meeting. It is of vital importance that, like other multilateral financial institutions, the AIIB make Project Team Leaders available to meet with affected people and NGOs. While we have not received any favorable responses to these meeting requests (except on the issue of FI lending), we would like to bring to your attention and discuss with you the ESF policy gaps based on our experiences in monitoring a number of AIIB-funded projects<sup>1</sup>. We hope that the AIIB will act urgently to help to resolve these project concerns and issues on land acquisition, lack of meaningful consultation, poor quality of information disclosure, faulty grievance redress mechanisms, environmental harm and labour violations, to name a few. As the Vice-President for Policy and Strategy, we equally hope that you can ensure that these lessons be learned and fed into the ESF review, and that the AIIB ensure the robust implementation of the ESF.

## 3. Timely and accessible information on projects for affected communities and civil society

We would like to highlight this cross-cutting issue of the lack of timely and accessible information, in particular relating to the time-bound disclosure of information relating to social and environmental impacts of projects on affected communities. The lack of, or slow response to project queries and the low quality of project documents being disclosed also pose significant risks in ensuring that likely adverse harm will be avoided, if not mitigated. We would also like to discuss with you our concern about the rushed technical amendments to the ESF with respect to information disclosure, which were undertaken without public notice or consultation, and the likely ramifications of their implementation.

We know that a broader meeting between Management, mainly the President and civil society has been scheduled. However, we would like to have a focused meeting on the issues listed above with you as the Vice-President in charge of Policy and Strategy and project leads/specialists would make such a meeting very productive.

Having known our organizations already from your tenure as Vice-President at the World Bank, you know that our main objective is to get the voices of affected communities heard and to help the AIIB to achieve better results in fighting poverty and fulfilling its mandate.

Looking forward to your reply.

Sincerely,



**Knud Voecking**  
(Urgewald)

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<sup>1</sup> Indicatively, we would like the following to raise ESF policy gaps and project concerns on the following: i) Myingyan Power Plant Project; ii) Emerging Asia Fund - Shwe Taung cement plant; iii) National Investment and Infrastructure Fund; iv) India Infrastructure Fund; v) Tarbela 5 Hydropower Extension Project; vi) Bhola IPP; vii) National Slum Upgrading Project; viii) Beijing Air Quality Improvement and Coal Replacement Project; ix) Gujarat Rural Roads Project; x) Colombo Urban Regeneration Project; and Nenskra Hydropower Project.

Co-signatories:

NGO Forum on ADB

BIC Europe

IDI - Inclusive Development International

Centre for Financial Accountability India

CLEAN (Coastal Livelihood and Environmental Action Network)

Both ENDS

Bretton Woods Project

Bangladesh Working Group on External Debt (BWGED)

International Accountability Project (IAP)

Sri Lanka Nature Group (SLNG)

Pakistan Fisherfolk Forum

OT Watch, Mongolia

SustainableEnergy (VedvarendeEnergi, Denmark)

Verein für sozial-ökologischen Wandel

Bank Information Center

Gender Action

Arbeitsgemeinschaft Globale Verantwortung, Austria

Ulu Foundation

Crude Accountability