

Amsterdam, 11 February 2020

Dear Board member of the AIIB,

We are writing with regard to the Asian Infrastructure Investment Bank's ongoing review of its Environmental and Social Framework.

As NGOs that have engaged with the AIIB, both at the policy and project level, extensively over the last few years, we have a strong interest in helping to ensure the review results in a high quality, effective framework of safeguards to protect the environment and human rights.

We would like to ask for your support on the Board to ensure that the public consultation around the ESF is as open and inclusive as possible. Therefore we are writing with the following requests:

- 1. Extension of consultation phase one:** Phase One of the review is forecast to end on February 28th. This is not sufficient time to engage in a meaningful way, especially given the European workshop on the ESF review will only take place on March 9th. As the early period of the review included Chinese New Year, and very little proactive outreach was carried out around the start of the review, it was already late by the time that NGOs discovered the review had begun. It takes time to prepare detailed inputs based on evidence and experience, together with our partners in the region, so we hope you can see the utility in lengthening the consultation period, as was done for the first ESF consultation. Therefore we request that you support our ask to the bank for an extension to at least the end of March 2020.
- 2. More clarity about the public consultation:** There is very little detail on the website about the review, including guidance for what can be submitted, as it is unclear how extensive the scope of the review will be. NGOs wish to input on all aspects of the review, from issues such as resettlement and financial intermediaries, to links with information disclosure and accountability. The text on the website does not specify if all areas of the ESF will be included in the review. In addition, there is no clear commitment to upload submissions to the AIIB website unedited, which is something NGOs have repeatedly asked for.
- 3. Ensure the consultations are more inclusive:** It is disappointing that submissions are limited to the English language. This automatically makes it much more difficult for regional input to the review, especially from those countries which are recipients of AIIB investments. The AIIB should be able, as other MDBs are, to translate the main regional languages to English. There will not be a massive volume of non-English language submissions, so it should not place an undue burden on the bank. Equally the drafts of the ESF must be available in the main regional languages. It is also good practice to ensure face to face consultations rather than simply via video-conferencing. Though we recognise the difficulties involved at the current time, we do encourage all efforts to be made to ensure this is facilitated. Information about consultations, together with a detailed schedule, should be publicly available at the beginning of the review to allow communities and NGOs time to prepare.

We appreciate your support to ensure this crucial consultation is effective and inclusive, to result in an improved Environmental and Social Framework for the AIIB.

Yours sincerely,

Anna van Ojik, Both ENDS
Annabel Perreras, Forum on ADB
Kate Geary, Recourse
Nora Sausmikat, Urgewald

Also on behalf of,

BIC US, United States
Christian Aid, UK
Global Responsibility (AG Globale Verantwortung), Austria
Inclusive Development International, International
Koordinierungsstelle der Österreichischen Bischofskonferenz für internationale Entwicklung und Mission (KOO), Austria
Les Amis de la Terre, France
VedvarendeEnergj, Denmark
Verein für sozial-ökologischen Wandel, Germany
Wildlife Conservation Society, United States