

<p style="text-align: center;">Comments on Updated Consultation Plan for the Preparation of Safeguard Policy Statement</p>

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The followings are our comments on Updated Consultation Plan for the Preparation of Safeguard Policy Statement (SPS);

1. **Comparative Matrix of OMs:** ADB should also provide a matrix comparing requirements in draft Operations Manual (OM) and existing OMs (Section F1-3 and other related OMs), so that stakeholders can understand whether the new draft OM is weaker than current OMs.
2. **Comment Period:** Proposed 30-day comment period is too short for stakeholders to provide appropriate comments on complicated documents. ADB should allocate minimum 90-day comment period for these documents
3. **Consultation:** Recognizing more than 100 organizations boycotted at previous consultations, proposed 1.5 day consultation for multi-stakeholders in Manila is inadequate. ADB should hold consultations in several places across the Asia and Pacific.
4. **Translation:** Language is the key to understand 2nd draft SPS, draft Operations Manual and comments-response matrix for people especially living in DMCs. ADB should translate these documents into at least 4 languages (Bahasa Indonesia, Mandarin, Russian and Vietnamese).
5. **Disclosure of R-paper:** ADB should post the R-paper of SPS available on the ADB web site at the same time as ADB Management submits the paper to the Board of Directors.