

## Comments on the Draft Safeguard Policy Statements

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(Note: The views expressed in this document are those of the author and do not necessarily reflect the views or policies of the MOEJ.)

1. It seems that the draft is intended to be revised in a rational and practical way. Such revision leads to the impression that the draft may weaken the safeguard standards. If there is no intention to weaken the current safeguard standards, it should be clearly mentioned in the draft as a key policy.

2. Harmonizing with safeguard policy of other MFIs (para 31) is important, but it may also lead to weaken the current ADB policy. It should be carefully considered so that each element of harmonization does not harm the concept of “no intention to weaken the policy”.

3. In Japan, JICA and JBIC have been updating their environmental guidelines. From the view point of harmonization, it might be useful to reflect the current discussion into the SPU of ADB if the schedule is allowed.

4. It is not clear in which case the Framework Approach is applied and how (para52-54). More explanation should be added because this approach may also weaken the policy when it is inadequately applied. The role of ADB in this approach could be clarified.

5. Use of CSS (para 30, Appendix 3): I agree with the concept that CSSs should be used as much as possible, but it is not clear whether or not CSSs are well developed and implemented in many countries in the Asian Region. I suggest that ADB show independent analysis on each CSS if ADB intends to encourage the use of CSS. Otherwise, it may be difficult for borrowers/clients to judge if they can use it.

6. Information Disclosure and Consultation in Attachment A (Environment): The procedure and the timing for consultation could be clarified.

7. ADB's Environmental Assessment Guidelines developed in 2003 should properly be referred in the Draft. In addition, the Guidelines could also be updated to reflect current situation and development of methodologies for assessments. For example, the assessment on climate change/GHG emissions could be included in the Guidelines.

8. Global impacts:

(1) Para 5 of Attachment A says "The assessment will also consider ... global impacts, such as on climate." This sentence could be revised as "... such as on climate change by assessing the GHG emissions." because the original text might be read as if the assessment of direct impacts on climate by the project would be required.

(2) The assessment of GHG emissions at the project level is important, but the introduction of the concept of "low carbon" into the planning of the project is more important. MOEJ is planning to develop guidance for "low-carbon projects" and I suggest that ADB also consider developing it.

9. Monitoring and reporting (para 49, etc.): I agree with the concept of the update trying to strengthen the function of monitoring. It could be more clearly mentioned that the corrective measures should be considered and applied based on the analysis of the monitoring results.

10. It is not clear why an independent paragraph is given to Project Loans (para 51), while other types of projects/programs are mentioned in Attachment.

11. Appendices and Attachments include important and essential information. The structure of the new Policy could be reconsidered; e.g. Attachment A-C could be integrated into the main text.

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