Lessons Learned from Compliance Reviews at the Asian Development Bank (2004–2020)

Fuzhou Environmental Improvement Project in the People’s Republic of China

Lessons Learned from Compliance Reviews of the Asian Development Bank 2004–2020 is a series of publications prepared by the Office of the Compliance Review Panel. It examines compliance reviews for eight projects with Asian Development Bank assistance that were the subjects of complaints to the Compliance Review Panel in 2004–2020. The Fuzhou Environmental Improvement Project in the People’s Republic of China is the second in the series that was subject to compliance review under the 2003 Accountability Mechanism Policy. It emphasizes the importance of thorough investigation along with a fair, objective, and impartial review to ensure ADB’s development effectiveness.

About the Asian Development Bank

ADB is committed to achieving a prosperous, inclusive, resilient, and sustainable Asia and the Pacific, while sustaining its efforts to eradicate extreme poverty. Established in 1966, it is owned by 68 members —49 from the region. Its main instruments for helping its developing member countries are policy dialogue, loans, equity investments, guarantees, grants, and technical assistance.
Nantai Island Inland Creek Rehabilitation. Upstream reach of Yuejin River after the completion of the river rehabilitation work under component 1 of this project. 
LESSONS LEARNED FROM COMPLIANCE REVIEWS
OF THE ASIAN DEVELOPMENT BANK (2004–2020)

Fuzhou Environmental Improvement Project
in the People’s Republic of China
The Lessons Learned from Compliance Reviews of the Asian Development Bank (2004–2020) series endeavors to provide lessons and institutional knowledge for strengthening the development effectiveness of ADB. The lessons shared through this series provide opportunities for improved project design and implementation, and a strengthened compliance review function. Should discrepancies arise between this document, ADB operational policies, and the Accountability Mechanism Policies 2003 and 2012, the relevant ADB policies will prevail.

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Notes:
In this publication, “$” refers to United States dollars.
All photos are from ADB.

On the cover: Many steps, one process. The different processes involved in the compliance review of a project—from field visits, consultations, and discussions—all work toward a unified goal and comprise ADB’s Accountability Mechanism that is symbolized by the gear.
# TABLE OF CONTENTS

<table>
<thead>
<tr>
<th></th>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>KEY LESSONS</td>
<td>5</td>
</tr>
<tr>
<td>2</td>
<td>BACKGROUND</td>
<td>5</td>
</tr>
<tr>
<td>3</td>
<td>KEY COMPLIANCE REVIEW PROCESS</td>
<td>8</td>
</tr>
<tr>
<td></td>
<td>SUCCESSES AND CHALLENGES</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>LESSONS LEARNED</td>
<td>9</td>
</tr>
<tr>
<td></td>
<td>ABBREVIATIONS</td>
<td>12</td>
</tr>
<tr>
<td></td>
<td>ACKNOWLEDGMENTS</td>
<td>12</td>
</tr>
<tr>
<td></td>
<td>REFERENCES</td>
<td>12</td>
</tr>
</tbody>
</table>
The Fuzhou Environmental Improvement Project in the People’s Republic of China (Fuzhou Project) was a project with assistance from the Asian Development Bank (ADB) that went through compliance review under the 2003 Accountability Mechanism Policy (2003 AMP). The compliance review function of the 2003 AMP investigates alleged noncompliance by ADB with its operational policies and procedures that may have directly, materially, and adversely affected the complainants during the formulation, processing, or implementation of an ADB-assisted project.

This is the second in the Lessons Learned from Compliance Reviews series of publications prepared by the Office of the Compliance Review Panel (OCRP). The series examines completed compliance reviews for eight ADB-assisted projects that were the subject of complaints to the Compliance Review Panel over the period of 2004–2020.

The Lessons Learned from Compliance Reviews series explores the challenges, gaps, and good practices in each project as highlighted through the compliance review process. The insights presented in this report were gathered through a comprehensive review of documents, as well as by means of a survey and interviews of ADB project staff from headquarters and resident mission, former members of the Compliance Review Panel, and staff of the OCRP. Though the Lessons Learned series is prepared by the OCRP, it does not reflect OCRP’s opinion unless so specified in each report.

This series provides practical insights for development practitioners, safeguard specialists, nongovernment organizations, civil society organizations, government personnel, project beneficiaries, and ADB Management and staff seeking to learn more about project design, implementation, and the process of compliance review. It aims to contribute to capacity development on project management and good institutional governance.

SNAPSHOT

Project

Project Title: Fuzhou Environmental Improvement Project in the People’s Republic of China (Asian Development Bank Loan No. 2176-PRC)

Country of Implementation: People’s Republic of China

ADB Financing: Loan 2176: $55.80 million

Approval Date: 29 July 2005

Closing Date: 19 October 2012

Project Impact Categorization: A for Environment

Required Involuntary Resettlement

No impacts on Indigenous Peoples

Complaint

Date of Request for Compliance Review: 28 April 2009

Complaint Status: Closed. No determination of compliance or noncompliance made.

Link to the Complaint Documents: https://lnadbg4.adb.org/dir0035p.nsf/alldocs/BDAO-7XVBN97OpenDocument

a The Fuzhou Municipal Government provided financing to the Fuzhou Project equivalent to $87.24 million, and domestic bank financing was equivalent to $61.4 million.
1 KEY LESSONS

The compliance review of the Fuzhou Project generated several important lessons. The review also encountered various challenges and highlighted opportunities to improve project management and compliance review processes in the future. The following are the significant lessons learned:

Site visits are essential for an objective compliance review.

As part of the compliance review, a site visit is requested from the borrower to (i) ascertain and verify the identity of the complainants, (ii) understand the project harm to affected people and determine if there exists a link to ADB's noncompliance, and (iii) confirm the veracity of other details pertaining to the complaint. Such information leads to a fair and objective compliance review. Without a site visit, the compliance review remains incomplete. More information can be found in section 4.2.

Alternative methods of investigation must be explored if the site visit request is declined.

If a request for a site visit is declined, the Compliance Review Panel (CRP) should try its best to use alternative methods of investigation, such as meeting with ADB Management and staff at ADB headquarters and using communication technology for interviews with all stakeholders, including project staff in resident missions, as well as affected people to ensure (i) affected people's concerns are addressed, and (ii) ADB is compliant with its operational policies and procedures. More information can be found in section 4.3.

ADB staff must explain the objectives of ADB's Accountability Mechanism and the role of the Compliance Review Panel to the borrower to strengthen ADB's development effectiveness.

A key insight from CRP's compliance review in this project is that to ensure development effectiveness through maximum benefit of the project, an impartial review of ADB's compliance with its policies is essential. It is also important that grievances of the affected people, if any, are addressed in the most efficient and effective manner. To achieve this development effectiveness objective, the borrower must be introduced to ADB's AMP during the fact-finding stage of the project cycle. More information can be found in section 4.4.¹

2 BACKGROUND

Brief Project Description

The Fuzhou Project was an urban infrastructure initiative to improve the environmental quality and living conditions in the project areas by reducing water pollution and protecting water resources to contribute to the goal of environmental improvement and pollution control in the People's Republic of China (PRC, the borrower). The project was a key infrastructure project of the Fuzhou Municipal Government (the executing agency) and had four components:

(i) **Component A.** Yangli phase 2 sewer networks, which would expand the Yangli sewer networks serving the eastern part of Fuzhou;
(ii) **Component B.** Lianban sewer networks, which would entail construction of a Lianban sewer network on Nantai Island in the southern part of Fuzhou;
(iii) **Component C.** Nantai Island creek rehabilitation, which would rehabilitate 13 inland creeks for pollution control and flood protection on Nantai Island; and
(iv) **Component D.** Capacity building, which would provide training to the Fuzhou Municipal Government on project management, waste management, and private sector participation in municipal services.²

¹ The fact-finding stage refers to the ADB project team's consultation mission in the relevant country to finalize the project design and to obtain the government's commitment. Details of the project and commitments of ADB and the government are normally recorded in a fact-finding memorandum.
The project required involuntary resettlement in project implementation and was categorized A for environmental impact. Consequently, as provided in ADB’s safeguard policies, environmental impact assessments and resettlement plans were prepared. For this project, a resettlement plan was prepared in 2004 and updated in 2008.

Summary of the Complaint

Seven households from the project’s affected area submitted a letter of complaint to the OCRP, dated 25 November 2008. The complaint was forwarded to the special project facilitator in accordance with the requirement at that time under the 2003 AMP requirement for a consultation phase. During this phase, five households reached agreements with the government on compensation. The two remaining requesting parties, who were unable to reach agreements, asked that the consultation phase of problem solving be terminated and, instead, requested a compliance review.

The complaint was registered by the OCRP on 5 June 2009. The main concerns were as follows:

(i) loss of housing,
(ii) loss of livelihood,
(iii) fear of homelessness, and
(iv) unfair compensation for resettlement for persons with and without legal property rights.

Compliance Review Process and Results

After a determination of eligibility on 24 June 2009 and clearance of the terms of reference of the compliance review by the Board Compliance Review Committee (BCRC) on 29 July 2009, the CRP proceeded with its compliance investigation that involved the following:

(i) a desk review of documents provided by
   (a) East Asia Department: Urban and Social Sectors Division
   (b) Office of the Special Project Facilitator (OSPF),
(ii) interviews with ADB Management and staff currently or previously involved in the project, and
(iii) telephone calls with the complainants (with assistance from a Manila-based interpreter).

During the conduct of the compliance review, the borrower proposed a change in project design that ADB eventually approved. This resulted in the rerouting of a section of the river, thereby avoiding the need to resettle the complainants.

Request for a Site Visit

As part of CRP’s compliance review stage, a site visit clearance is requested from the borrower to (i) ascertain and verify the identity of the complainants, (ii) understand the project harm to affected people and determine if there exists a tenable link to ADB’s noncompliance, and (iii) confirm the veracity of other details pertaining to the complaint. Unfortunately, the government did not provide clearance for the CRP’s site visit and explained that “After deliberation, we view the proposed site visit as no longer necessary given the fact that the project has been redesigned and a rerouting of a certain section of the river in the project area has taken place, and as a result, the project no longer involves the resettlement in discussion.”

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3 The Fuzhou Project used ADB’s 1995 Involuntary Resettlement Policy with the following explanation: “Involuntary resettlement should be an important consideration in project identification. The three important elements of involuntary resettlement are (i) compensation for lost assets and loss of livelihood and income, (ii) assistance for relocation including provision of relocation sites with appropriate facilities and services, and (iii) assistance for rehabilitation to achieve at least the same level of well-being with the project as without it. Some or all of these elements may be present in projects involving involuntary resettlement. For any project that requires relocating people, resettlement should be an integral part of project design and should be dealt with from the earliest stages of the project cycle…” Asian Development Bank. 1995. Involuntary Resettlement. para. 34. Manila.

4 The Fuzhou Project used the 2002 ADB Environmental Policy, with category A explained as follows: “Loans are classified into category A (with potentially significant environmental impacts); category B (with potentially less significant environmental impacts); category C (unlikely to have significant environmental impacts); and a new category, FI, (credit line for subprojects through a financial intermediary, or equity investment in a financial intermediary). A project’s environmental assessment category is determined by the category of its most environmentally sensitive component, including both direct and indirect impacts.” Asian Development Bank. 2002. Environment Policy of the Asian Development Bank. para 54. Manila.

5 Footnote 2, para. 10.

6 The Fuzhou Project followed the compliance review steps under the 2003 Accountability Mechanism Policy. The compliance review stage (also referred to as the investigation stage) is Steps 4 to 7 of the compliance review process in the updated 2012 Accountability Mechanism Policy.

The CRP maintained that since the complaint had been received prior to the change in the project design (rerouting of the river), a site visit was still needed to confirm or refute the claims regarding ADB’s noncompliance with its policies. Once again, the government declined the request for the site visit.

Finally, the CRP tried to approach the government through ADB’s executive director representing the PRC by emphasizing that for a fair, objective, and transparent review, a site visit is important especially when CRP’s mandate is only to assess ADB’s compliance with its operational policies and procedures and not to assess government policy or actions. The government still did not allow the site visit explaining the following: “(i) the resettlement plan was in accordance with both PRC and ADB relevant policies; (ii) the rerouting of the river had made the compliance review request obsolete; (iii) a senior government official who visited the project site confirmed that the requesting parties no longer lived in the area; and finally (iv) previous project site visits by the OSPF should provide the CRP with sufficient information for its compliance review. In the PRC’s view, the proposed site visit was, therefore, no longer necessary.”

During subsequent meetings, the CRP further clarified that rerouting of the river did not obviate the CRP mandate to investigate alleged ADB noncompliance, especially when the rerouting of the river did not render the complainants’ claim invalid as the alleged actual or potential harm may still have been caused by ADB’s prior act or omission amounting to noncompliance. Nevertheless, the original decision to refuse the visit was not changed and hence, the CRP decided that it was unable to make a determination on ADB’s compliance in relation to the project. The complaint was closed on 19 October 2010 with the Board’s decision that supported “the recommendation that the Board reconsider the issue of site visits under the ongoing review of the Accountability Mechanism Policy.”

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Footnote 7, para. 24.
Footnote 7, para. 25.
### 3 KEY COMPLIANCE REVIEW PROCESS SUCCESSES AND CHALLENGES

The table summarizes significant successes, gaps, and challenges faced during the compliance review of the Fuzhou Project, as identified by the survey respondents. Each point is further discussed in section 4.

<table>
<thead>
<tr>
<th>Compliance Review Process Successes</th>
<th>Compliance Review Process Gaps and Challenges</th>
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</thead>
<tbody>
<tr>
<td>• Experience from the Fuzhou Project contributed to an AMP Update that took place in 2011–2012 (The 2012 AMP clarified the administrative role of the OCRP and elaborated on the need for site visits). More information can be found in sections 4.1 and 4.2.</td>
<td>• Lack of clarity on administrative roles of the head of OCRP and CRP Chair under the 2003 AMP. More information can be found in section 4.1.</td>
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<td>• ADB Management and staff coordinated very well with the CRP in trying to obtain government’s clearance for site visits. More information can be found in sections 2.2.2 and 4.2.</td>
<td>• Lack of information verification due to lack of a site visit. More information can be found in section 4.2.</td>
</tr>
<tr>
<td>• The absence of a site visit also prompted use of communication technology to consult with stakeholders. More information can be found in section 4.3.</td>
<td>• Lack of borrower’s understanding on the objectives of the AMP and the role of the CRP. More information can be found in section 4.4.</td>
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</tbody>
</table>


Sources: Based on the comprehensive analysis of ADB Compliance Review reports and harvesting of lessons learned through interviews and survey responses for the Lessons Learned in Compliance Review report for the Fuzhou Environmental Improvement Project in the People’s Republic of China.
4 LESSONS LEARNED

The compliance review process of ADB’s 2012 AMP follows steps which fall under the following categories: (i) eligibility determination, (ii) compliance review, (iii) Remedial Action Plan/Management Action Plan and (iv) monitoring. The Lessons Learned in Compliance Review series ordinarily identifies lessons at each stage of the compliance review process, and highlights their implications for ADB’s processes of project design and implementation, and their contribution to future compliance reviews. In this project, due to a lack of a site visit, the compliance review process ended prior to the compliance review investigation. As a result, this report only discusses a few lessons learned without putting them under any compliance review category or step.

Clearly defined administrative roles are essential for an efficient compliance review.

The roles of the CRP members and of the secretary of the CRP are set out in the 2003 AMP as follows: “ADB will establish CRP consisting of three members, one of whom will be the chair, and OCRP to provide secretariat support. OCRP will have two professional staff members, one of whom will also be the secretary of CRP, and three administrative staff/national officers.”

The compliance review process brought to light the consequences of the AMP’s lack of clarity on the respective roles of the CRP chair and the OCRP secretary. It was not clear whether the OCRP secretary or the CRP chair was to serve as the administrative head of the OCRP. According to one survey respondent, this confusion led to a less efficient and less effective compliance review process.

The subsequent 2012 AMP addressed this ambiguity by providing a clearer description of OCRP reporting lines as follows: “The OCRP staff will support the CRP. The OCRP will be headed by the CRP chair and will have one international staff member and two administrative or national staff members. The international staff member of the OCRP will report to the CRP chair.”

Site visits are essential to complete a compliance review.

Without a site visit, the CRP was not able to form an adequate understanding of the situation on the ground. Consequently, the CRP found itself in a situation where it was unable to ascertain whether ADB complied with its operational policies and procedures; establish if ADB’s noncompliance, if any, caused direct and material harm to the complainants or affected persons; and provide recommendations to ADB or provide remedies to the complainants. The lack of a site visit resulted in an incomplete compliance review because:

(i) The CRP was unable to conduct meaningful consultation with the complainants.

As the complainants were based in the PRC, the CRP was forced to communicate with them via teleconference call (the only available technology at the time) from ADB headquarters in Manila, with assistance from a Manila-based interpreter. However, as a survey respondent reflected: “face-to-face meetings with the complainants/affected persons in a secure and free environment are very important.” Face-to-face discussions would have facilitated a comprehensive and objective understanding of the complainants’ concerns.

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11 Eligibility determination is steps 1–3 of the compliance review process under the 2012 AMP including: requesting management’s response, determining eligibility, and Board authorization of compliance review.

12 Compliance review (fact-finding) is steps 4–7 of the compliance review process under the 2012 AMP including: conducting compliance review, Compliance Review Panel’s draft report, Compliance Review Panel’s final report, and Board consideration of the Compliance Review Panel Report.

13 Remedial Action Plan is steps 8–9 of the compliance review process under the 2012 AMP including: management’s remedial actions and Board’s decision.

14 This Fuzhou Project followed the compliance review steps under the 2003 AMP that did not include monitoring as one of the steps, but included it as a separate stage. In comparison, the 2012 AMP provides 10 compliance review steps that already include monitoring.


16 Footnote 15, para. 117.

17 Footnote 7, para. 27.
(ii) The CRP was unable to verify the facts on the ground.
Without a site visit, CRP’s information was based on desk review of documents, interviews with ADB Management and staff, telecommunication with complainants, and a few photographs of the site received from the OSPF. A site visit could have provided the CRP with an opportunity to gather information and verify facts through meetings with a broader group of stakeholders.

(iii) ADB was unable to respond to the complainants’ claims.
Without a site visit, the East Asia Department, the department in charge of the project at ADB, was unable to provide the CRP with information from the field to respond to the complainant’s claims of noncompliance.

The absence of a site visit led to the CRP’s recommendation to the ADB Board of Directors to review the 2003 AMP provision on site visits. As a result, the 2012 AMP provided the ADB operations teams with a wider role, envisaging a cooperative approach with the CRP to facilitate site visits and to improve communication between ADB, the CRP, and the borrowing country. The 2012 AMP states: “if a site visit is declined, Management will discuss with the borrowing country the reasons for not accepting the requested visit. In consultation with the Board Compliance Review Committee (BCRC) and the borrowing country, Management will convey the reasons to the Board through an information paper.”

Given the importance of site visits for effective compliance review, this is an area that could be further strengthened in the next AMP update by exploring means of seeking commitment from the borrower in the project documents to allow site visits in case the Accountability Mechanism is triggered.

Alternative methods of investigation must be explored if a site visit request is declined.

The Fuzhou Project highlighted the need to employ alternative methods of investigation such as (i) holding interviews with ADB Management and staff at ADB headquarters, and (ii) use of communication technology to communicate with all stakeholders, including project staff in resident missions as well as affected people. Such modes of communication had already been tested once in this project through telephonic conversation with the complainants when the site visit request was declined (although this was not considered enough to verify its findings on the ground).

A survey respondent also emphasized that since there is a growing range of technological choices available, the CRP should continue to use all available means of reaching out, communicating and consulting with the project stakeholders, especially when the request for a site visit is declined to ensure that affected people’s concerns are heard, understood, and eventually addressed; and ADB’s compliance with its operational policies and procedures is ascertained. A compliance review is not complete without meaningful, secure, and free consultation with affected people, particularly the complainants, however, by investing time and resources to incorporate technology in the compliance review, implementation of the Accountability Mechanism becomes possible even during times when travel is not feasible, for whatever reason.

In this project, one of the government’s reasons for declining the site visit request was that the alleged harm was rendered obsolete due to the changed project scope. The need for project scope change in the first place, together with the complainants’ claim that their situation worsened due to such changed scope (realignment of the river) warranted the CRP’s further inquiry to find out if ADB was noncompliant with its operational policies and procedures at the project design stage and whether such noncompliance continued. Further investigation would have been justified also because the
complainants alleged that despite the changed project scope, the safety and accessibility conditions forced them to relocate to a faraway area from the project site. Such circumstances, if proved right, would have resulted in further harm in the absence of income or compensation.

Exhausting all means of communication and investigation is important because closing an eligible complaint without addressing the concerns of affected people defeats the objective of development effectiveness of ADB’s projects. However, it is also important to note that at times, alternative methods of investigation, in the absence of a site visit, may not be adequate for a successful compliance review.

**ADB staff must explain the objectives of ADB’s Accountability Mechanism and the role of the Compliance Review Panel to the borrower to strengthen ADB’s development effectiveness.**

To secure effective achievement of its development objectives, ADB has put in place robust policies to deliver essential safeguards together with an independent and impartial accountability mechanism. A key insight from the CRP’s compliance review in this project is that to ensure maximum benefit of the project, especially when a complaint is filed against ADB’s compliance with its policies, a detailed review of such compliance is crucial. For an effective compliance review, it is important that the borrower completely understands (i) the objectives of the Accountability Mechanism Policy; (ii) that the accountability mechanism does not provide a mandate to interfere with the borrower’s sovereignty, but is merely to ensure compliance by ADB with its operational policies and procedures; and (iii) that the affected people must feel confident in raising their grievances under the Accountability Mechanism Policy, and such grievances are addressed in the most efficient and effective manner.

Hence, during the fact-finding mission, ADB Management and staff should explain to the borrower, including all relevant execution and implementation partners, the objectives of ADB’s Accountability Mechanism and the role of the CRP. Such discussions should be recorded in fact-finding commitment documents like the Memorandum of Understanding or the Aide Memoire. Subsequently, the project team may try to seek the borrower’s commitment to comply with the Accountability Mechanism Policy within final legal agreements. This process of explanation and documentation can assist in setting expectations and laying the groundwork for future compliance reviews. It also helps the project implementation partners to understand the independent and impartial role of ADB’s Accountability Mechanism.

ADB’s Accountability Mechanism is designed to further enhance the effectiveness of ADB’s development initiatives and continuously improve the quality of its projects by being responsive to the concerns of project-affected people, and fair to all project stakeholders. The borrower’s commitment to the objectives of the AMP is indispensable to continued advancement of inclusive and sustainable development in the region.

22 “A compliance review will not investigate the borrowing country, the executing agency, or the private sector client. The conduct of these other parties will be considered only to the extent that they are directly relevant to an assessment of ADB’s compliance with its operational policies and procedures. The compliance review will not provide judicial-type remedies, such as injunctions or monetary damages.” ADB. 2012. Accountability Mechanism Policy. Manila. para. 130.

23 ADB’s fact-finding takes place during the early stages of the project cycle.

ABBREVIATIONS

ADB  – Asian Development Bank
AMP  – Accountability Mechanism Policy
BCRC – Board Compliance Review Committee
CRP  – Compliance Review Panel
OCRP – Office of the Compliance Review Panel
OSPF – Office of the Special Projects Facilitator
PRC  – People’s Republic of China

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REFERENCES


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