

SAFEGUARDS ISSUES CONCERNING
BUNG RIVER 4 HYDROPOWER PROJECT [P.13]

BANKWATCH

DECEMBER 2015



NGO FORUM TO ADB:
“START BANKING FOR NOT ON DEVELOPMENT”
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FORUM COMPLETES STRATEGY PLAN
FOR 2014 - 2020 [P.15]

NGO Forum
on ADB

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In a civil society meeting with ADB President Takehiko Nakao at the 48th Annual Governors Meeting, the 250-member strong NGO Forum on ADB urged the Bank to implement concrete policy tools and practices on safeguards and human rights in order to eradicate poverty and inequality in Asia. Forum added that ADB's open engagement with civil society organizations is indispensable in making the Bank more accountable and effective.

Forum executive director Rayyan Hassan noted that the 2009 Safeguard Policy Statement (SPS) clearly states that the higher standards of Safeguards should apply in any ADB-financed project. Hassan asked the ADB President to clarify whether the SPS would cover any joint project with AIIB in the future.

In response, President Nakao made an assurance that for co-financing projects; the ADB will apply its own standards. The ADB President pointed out that the AIIB interim secretary Jin Liqun has already expressed that safeguard policies are important for all projects and that AIIB would adhere to international standards of safeguard policies.

However, while President Nakao said the AIIB will make its own efforts on safeguards, he also emphasized the question of how they will be implemented as very important.

"It is crucial for the ADB to implement its safeguard policies on all projects including co-financing agreements with commercial, bilateral and multilateral agencies such as the newly-

created AIIB," Hassan said. "The stringent application of environmental and social safeguards with strong human rights dimension is one good way for the ADB to prove that it is indeed a bank for development."

Moreover, Hassan said the ADB-AIIB co-financing initiative would further underline the glaring gaps in ADB's delivery mechanism of its safeguards as revealed by the operational review conducted by its own Independent Evaluation Department (IED) in 2014.

He cited the following:

- (i)Lack of any disclosure and reporting gaps in ADB's financial intermediary (FI) private sector projects
- (ii)Glut increase in category B projects to avoid more stringent environmental and social assessments
- (iii)Poor quality at entry of information in regards to environment, resettlement and indigenous peoples issues pre-project approval
- (iv)lack of clear response on project monitoring by ADB on Safeguards with almost non-existent on site field visit by ADB safeguard staff.

In reaction, President Nakao acknowledged that IED's safeguards evaluation did raise many issues but at the same time, reiterated that safeguards are a hallmark of ADB and borrowing nations should consider them a contribution instead of a burden. Hassan further added, "unfortunately safeguard policies have been perceived by most development actors, especially public and private borrowers as 'obstacles' to the path of project implementation. ADB should ensure due diligence in design,



NGO FORUM TO ADB: “START BANKING FOR NOT ON DEVELOPMENT”



Rayyan Hassan, Forum executive director raises with President Takehiko Nakao the imperative to implement high safeguards and human rights standards in its operations and investments.

implementation and supervision of its safeguard measures for all projects per the recommendation of the IED; if it intends to be true to its original mandate of poverty alleviation in Asia.”

Forum also expressed serious concern on the shrinking civic space and restriction on civil society in countries where ADB operates such as Lao PDR, Uzbekistan and Azerbaijan. The group joined Human Rights Watch in appealing to the

Bank to urge the Azerbaijani government to end its crackdown on activists and independent groups.

President Nakao replied that ADB will continue to lend to the said countries because they are making efforts to adhere to standards, such as labor standards. He added that these countries are still developing and trying to reduce poverty. Citing the economy of Azerbaijan over that last 10 years, he said social indicators have become much better, including literacy and maternal mortality.

On civil society space, President Nakao said even developed countries have to make progress on working with CSOs. ADB is trying to address those issues according to him.

*****PRESS RELEASE DURING THE 48TH ANNUAL GOVERNORS MEETING**

NGO FORUM CALLS ON AIIB TO HAVE ROBUST SAFEGUARD STANDARDS

With 57 nations already on board the Asian Infrastructure Investment Bank (AIIB) as prospective founders, a 250-member strong civil society network made an appeal to the newly-formed bank to adopt robust safeguards in its principles, policies and operations.

NGO Forum on ADB, in a formal letter to the AIIB, underscored the need for the bank to formulate and implement the highest standard of safeguards in view of the limits to the planet's growth and the impacts of huge infrastructure projects on vulnerable Asian communities. In doing so, Forum said the AIIB can become a standard-bearer of safeguard policies across all multilateral development banks (MDBs).

Forum, which is based in Manila, likewise recognized the role of the Chinese government in AIIB's establishment and its earlier pronouncements to set up high-standard, feasible safeguard policies.

The Asian-led coalition of NGOs has, for decades, spearheaded civil society campaign towards the creation and strengthening of environmental and social protection at the Asian Development Bank (ADB) and recently, has directly engaged the World Bank in the latter's safeguards review process. Forum's member organizations come from at least 19 countries that have signed the memorandum of understanding that establishes AIIB.

Forum asked AIIB, which is currently developing its core philosophy, operating platform and value system, to comply with international best practices and national, local or customary laws. The NGO coalition added that AIIB must ensure that its operations respect local traditions, culture and knowledge systems, especially of Indigenous Peoples (IPs) and cultural minorities. It also said the bank's projects and programs should not harm local environment, ecosystem and biodiversity, as well as thoroughly consider climate change impacts.

"In line with AIIB's modus operandi of lean, clean and green, we appeal to the bank and the leaders of China to carry the concerns and needs of Asia's most vulnerable groups and communities through the creation of superior safeguard policies," according to Rayyan Hassan, Forum executive director.

"Given that AIIB is founded on lessons learned from existing MDBs and private sector, the bank is on the right path towards institutionalizing socio-environmental shields that would minimize, if not outrightly contain, any collateral damage or rights-based violation caused by poorly-implemented development projects," Hassan stated.

At the same time, Hassan requested the inclusion and participation of civil society in AIIB's safeguard policy formulation saying "our civil society network can provide the bank with



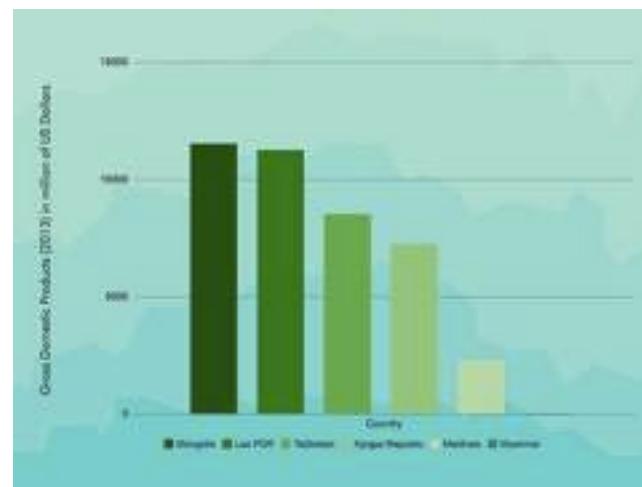
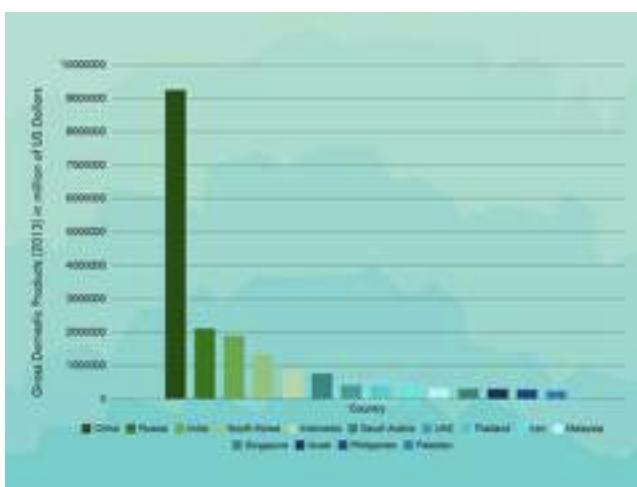
AIIB Headquarters. Beijing, China

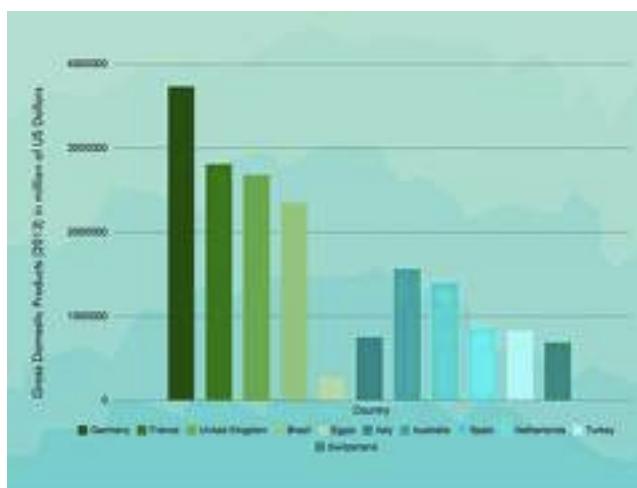
information regarding potential risks on the ground across the region."

Forum has asked AIIB to ensure public transparency and public participation in decision-making process, in particular follow the principle of "free prior informed consent or objection." Likewise, it also said the AIIB including its private sector operations should comply with the bank's own safeguards, international conventions and national laws.

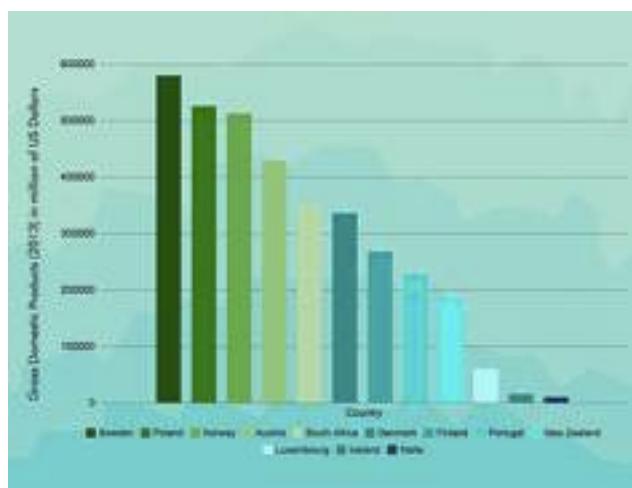
The civil society network urged the bank to ensure the right to equality and non-discrimination to the following: IPs, ethnic and cultural minorities, women, children, persons with disabilities, and sexual orientation and gender identification expression (SOGIE).

AIIB, as of April, has identified 57 prospective founding members, namely Australia, Austria, Azerbaijan, Bangladesh, Brazil, Brunei, Cambodia, China, Denmark, Egypt, Finland, France, Georgia, Germany, Iceland, India, Indonesia, Iran, Israel, Italy, Jordan, Kazakhstan, Kuwait, Kyrgyz Republic, Laos, Luxembourg, Malaysia, Maldives, Malta, Mongolia, Myanmar, Nepal, Netherlands, New





Zealand, Norway, Oman, Pakistan, Philippines, Poland, Portugal, Qatar, Russia, Saudi Arabia, Singapore, South Africa, South Korea, Spain, Sri



Lanka, Sweden, Switzerland, Tajikistan, Thailand, Turkey, United Arab Emirates, United Kingdom, Uzbekistan and Vietnam.

GROUPS DEMAND SAFEGUARD NORMS FROM CHINA-LED AIIB

Amid the recent decision of the Asian Development Bank (ADB) to collaborate with the Asian Infrastructure Investment Bank (AIIB), groups expressed the need for the China-led institution to adopt safeguard standards.

Safeguard policies, which are part of the governance structure of multilateral development banks (MDBs) like ADB, are necessary to ensure that projects funded by these institutions are socially and environmentally responsible.

"We appeal to the bank [AIIB] and the leaders of China to carry the concerns and needs of Asia's most vulnerable groups and communities through the creation of superior safeguard policies," said Rayyan Hassan, executive director of the civil-society network NGO Forum on ADB.

The NGO coalition added that the AIIB must ensure that its operations respect local traditions, culture and knowledge systems.

These include those involving indigenous peoples, ethnic and cultural minorities, women, children, persons with disabilities, and sexual-orientation and gender-identification expression.

The forum also said the bank's projects and programs should not harm local environment, ecosystem and biodiversity,

as well as thoroughly consider climate-change impacts.

"Given that the AIIB is founded on lessons learned from existing MDBs and private sector, the bank is on the right path toward institutionalizing socio-environmental shields that would minimize, if not outrightly contain, any collateral damage or rights-based violation caused by poorly implemented development projects," Hassan stated.

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Apart from safeguard policies, the AIIB's overall governance structure is of utmost concern to countries like the Philippines.

While the Philippines has signed a memorandum of understanding to join discussions to establish the AIIB, the country's commitment to join the AIIB remains contingent on the MDB's governance structure.

Earlier, National Treasurer Roberto B. Tan said the governance structure of the AIIB must be responsive to the needs of poorer members of the MDB.

One of these needs is for a transparent procurement process, according to National Economic and Development Authority Deputy Director General for Programming Rolando G. Tungpalan.

Tungpalan told the BusinessMirror that when the country obtains official development assistance loans from the ADB, their procurement process will be followed, which often subscribes to international competitive bidding.

Under cofinancing arrangements between the ADB and other MDBs, like the Agence Française de Développement, or the French Development Agency, and the European Investment Bank, the bigger lender's procurement rules will be followed. ADB President Takehiko Nakao and AIIB Multilateral Interim Secretariat Secretary-General Liqun Jin agreed to cofinance infrastructure

projects on the sidelines of the ADB's 48th Annual Meeting in Baku, Azerbaijan.

Nakao and Jin agreed that both MDBs can play a critical role in closing the infrastructure gap in the region. These infrastructure projects can support sustainable development and poverty reduction, and the importance of safeguard policies on environmental and social impacts of projects.

"The ADB will cooperate and cofinance with the AIIB on infrastructure financing across Asia by using our long experience and expertise in the region," Nakao said.

In May last year, ADB East Asia Department Director General Ayumi Konishi said the infrastructure needs of Asia are expected to double to around \$800 billion a year in the 2011-to-2020 period, from around \$400 billion a year in the preceding decade.

But, Konishi said, multilateral institutions, like the ADB, the World Bank and International Finance Corp., and other existing organizations could only provide, at the most, \$50 billion a year. This leaves around \$750 billion worth of infrastructure projects unfunded in this decade.

The AIIB was proposed by China's President Xi Jinping in a visit in Southeast Asia in October 2013.

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FAST FACTS

ADB FUNDED PROJECTS IN TAJIKISTAN



Tajikistan had its independence on September 9, 1991



But it already has 76 ADB funded projects



That's like 3 project(loans, grants or technical assistance) a year, since its independence

75 of the loans are considered SOVEREIGN which means that the loans are extended to the government or guaranteed by the government.

HOW MUCH LOAN DOES A COUNTRY NEED WHEN THEIR POPULATIONS IS JUST 8.6 M WITH A LAND AREA OF 143,100 km²?

FORUM CLOSELY MONITORS SPS EVALUATION OF ADB

Forum finds itself once again at the forefront of civil society engagement on Safeguards with the ADB, four years after a successful campaign to strengthen the said policy. An omnibus policy encompassing environment, involuntary resettlement, and Indigenous People policies, the 2009 Safeguard Policy Statement² protects the people and environment from any harm caused by ADB operations. It officially took effect in January 2010.

SPS INTERNAL EVALUATION³

In the first half of 2013, the Bank's Independent Evaluation Department or IED commenced an internal evaluation process of the SPS. ADB expects to end it by September 2014, in time for the mid-term review of the Asian Development Fund XI⁴ in the last quarter of the year.

The first phase is an operational assessment of its Country Safeguards System and Financial Intermediary investment in selected client countries.⁵ Based on ADB's original timeline, this process should have been completed in December 2013, with the release of an Approach Paper. Bank insiders said the Approach Paper will most likely be released by April 2014. This means that the

process has been delayed by four months.

The second phase of this internal evaluation will be a full-policy review of the SPS. Both are being undertaken by IED under the supervision of the Development Effectiveness Committee (DEC).

Historically, Forum Network members and partners have spearheaded efforts of civil society actors in the creation of these safeguard policies. They have led the fight to enhance policy provisions as well as preserve these provisions in both letter and spirit. In the last Safeguards Policy Update that lasted from 2005 to 2009, Forum has successfully pushed for the following: (i) the elaboration of requirements for meaningful consultation; (ii) the provision for the improvement of lives and livelihoods for involuntary-displaced people, (iii) a more detailed description for processes and requirements in regard to CSS; (iv) safeguard requirements for other financing modalities including FI; and (v) the improvement of gender language. However, some of the Network's concerns particularly those related to the language of the involuntary resettlement policy has remained a point of contention.⁶

After the SPS became effective in 2010, more borrowers have complained about the long process and strict safeguards requirements for a project or program loan.

It should be emphasized that the IED web page has not updated its timeline despite the delays in the process.

CONCERNs AND ISSUES

Forum is closely following the SPS evaluation process (and subsequent reviews) to ensure that the SPS remains a reliable tool of protection for peoples and ecosystems unwittingly displaced, disrupted or destroyed by the Bank's development agenda. Forum advocates against any dilution of the SPS and urges the Bank to resist caving in to pressure from its public and private clients to water down the policy.

After the SPS became effective in 2010, more borrowers have complained about the long process and strict safeguards requirements for a project or program loan. Hence, there is both increased pressure from these clients for less stringent safeguards requirements. The ADB is also threatened by the possibility of these clients getting loans from other banks with no safeguard conditionalities at all. Furthermore, ADB financing in the form of project loan and technical assistance grants are increasing in many countries. A weaker SPS increases the vulnerability of communities and marginalized groups to social, economic and environmental problems, especially in the face of escalating climate-induced disasters.

Process-wise, an issue that has repeatedly surfaced pertains to how transparent and inclusive of external stakeholders, particularly civil society and affected communities, this internal evaluation is. Compared to the last Safeguards review process, which went on for more than five years, this process has less transparency and inclusivity.

Likewise, Forum recognizes that IED's role as of the

SPS evaluation/review is in compliance with SPS Paragraph 82. This was a last-minute addition of the ADB to the SPS document prior to its final approval. This precluded Forum members from intervening on or questioning the appointment of IED.

Under the policy, IED is mandated to conduct the 3-year operational review and the 5-year full-policy review upon the effective date of the SPS, which was January 2010. As indicated in the IED approach paper⁷, however, the evaluation will be delivered 4 years and not 5 years after the 2009 approval of the SPS. This is because ADF donors have requested the finalization of the evaluation before the ADF XI mid-term review in late 2014.

It should be emphasized that the IED webpage has not updated its timeline despite the delays in the process. Similarly, there is no significant information about the SPS operational review on the webpage of the Safeguards Policy. While it is an internal process, Forum believes that civil society and other stakeholders deserve transparent and up-to-date information on this operational review. In this regard, Forum has lobbied and sent official correspondence to ADB Board members, top Management officials, and IED to involve civil society in the internal SPS evaluation. ADB's reaction is limited to getting case studies on its CSS and FI implementation from Forum or other CSOs. Similarly, Forum has urged the Bank to undertake a full-scale policy review and meaningful stakeholders' consultation to further strengthen the policy language and provisions of the current SPS.

¹ <http://www.adb.org/sites/default/files/pub/2009/Safeguard-Policy-Statement-June2009.pdf>

² <http://www.adb.org/sites/default/files/EAP-TES-Safeguards.pdf>

³ ADB's largest and oldest fund, the ADF offers loans at very low interest rates as well as grants to ADB's poorest member countries.

⁴ The CSS evaluation covers five client countries: Pakistan, Indonesia, India, Mongolia and Vietnam. For the FI evaluation, six countries are involved: People's Republic of China, India, the Philippines, Kazakhstan, Sri Lanka, and Pakistan

⁵ http://www.forum-adb.org/docs/Comments-SafeguardsRPaper_July14.pdf

⁶ <http://www.adb.org/sites/default/files/EAP-TES-Safeguards.pdf>

SAFEGUARDS ISSUES CONCERNING BUNG RIVER 4 HYDROPOWER PROJECT



The ADB's \$196 million-loan project for the development of the Bung River 4 Hydropower Project in Vietnam will cause huge environmental impacts. It will also lead to the resettlement of minority groups who will face irreplaceable loss of their livelihood. These were the survey findings of a Vietnamese monitoring group, which undertook field visits in a number of project sites.

PROJECT BACKGROUND

The Song Bung 4 Project is for construction and commissioning of 156-MW hydropower and associated facilities. Since it is highly sensitive, it has been categorized as "A" impacts on environment, resettlement and Indigenous People. The project will require the resettlement of more than 200 households belonging to the Co Tu ethnic minority. These are people who currently depend on the forest and its resources for their livelihood.

The Project's objective is to help meet Viet Nam's increasing power demand in an environmentally sustainable and socially-inclusive manner. The scope includes the construction of Song Bung 4 hydropower project in compliance with ADB's Safeguards requirements, especially the restoration

and improvement of livelihoods of project-affected people.

SURVEY FINDINGS

The Project Management Board (PMB) along with government department representatives from Nam Giang district in Quang Nam province, the communities directly affected by the hydropower development, ADB Resident Mission representatives and civil society groups came together last June 20 to discuss the implementation of Bank's Safeguards Policies in the

hydropower project. The said meeting was organized by the Vietnam Rivers Network (VRN), in cooperation with Quang Nam Union of Science and Technology Associations (QNAUSTA).

The meeting was organized to discuss the findings of eight representatives from Vietnam River Network member organizations, which surveyed the Bung River 4 Hydropower Project sites in Parum B, Pa-dhy and va Thon Hai villages in Nam Giang district, Quang Nam Province. The field visit took place on May 3-5.

The monitoring group completed an independent analysis of the implementation of Safeguards Policies (environment, involuntary resettlement and Indigenous People) at the project level. It revealed several shortcomings in the policy implementation.

RESETTLEMENT AND COMPENSATION ISSUES

The compensation process does not factor in inflation rates. It ignores valuable and important property assets like trees, fences, and other items.

Controversial issues such as moving graves and wooden houses have not been addressed. In some cases, action has been taken in an ad hoc manner. In many cases, land rights certificates were not provided. New settlements do not have roads and other infrastructure, which was available before.

The fundamental livelihood of minority groups has shifted from the multi-plot “slash and burn” agriculture to single-plot sedimentary farming system. It has posed negative impacts on the traditional lifestyle of minority groups. These affected persons may not be able to adjust themselves with these new conditions.

Since certain communities were resettled to a new area, there is now a strong competition for resources among various groups such as in the case of Pa-rum B village. There are many people who do not yet have access to clean water due to resettlement to new area.

IMPACTS ON THE CO TU ETHNIC MINORITY

There is a change of role and status of Co Tu women in agriculture because the available farming lands have been reduced in size (approx five to ten times). This will affect their usual livelihood and traditional farming system.

The PMB has a complaint settlement process involving the Commune People's Committee (CPC) ~ Management and Implementation Council of Resettlement – District People's Committee (DPC) ~ Provincial People's Committee (PPC) ~ District People's Court ~ Provincial People's Court. This process may be difficult to access for ethnic minority people. It is very expensive and lengthy process as well. This process does not meet the Safeguards requirements for “accessible to the IP at no cost, and no retribution” grievance redress mechanism. In fact, more than half of the Co Tu people are poor. Many are illiterate and isolated from district and province capitals.

DISCUSSIONS WITH GOVERNMENT AND ADB

Representatives from the Nam Giang DPC, the Bung River Board of Management, Department of Industry and Commerce in Quang Nam province also shared their opinions. However, the Board of

Management acknowledged the limitations of the resettlement process and expressed the hope that this would be improved. The Board of Management will consult with the PPC about the availability of building timber for the villagers of Parum B. They will also consider whether it is possible to provide recreation facilities for people living in the administration area, where the land is not suitable for a sports facility. The Board also agreed to moving graves in the wetlands in the coming days.

The ADB representative, who is an energy expert, welcomed the VRN initiative. The representative had the opportunity to participate in an open discussion over the project regarding challenges and concerns of affected people and other interested parties.

The comprehensive discussion tackled/recognized the restrictions, risks and challenges of the project. Participants hope that it will lead to some positive outcomes for the communities directly affected by Bung River 4. They also hope that in the future, there will be a joint planning process for hydropower projects, which will be prepared by project executors together with affected people.

Any development project needs to exercise good practices that will strengthen the protection of local communities and environment. Project executors need to ensure that all stakeholders participate in a dialogue around development issues in Vietnam. In order to have meaningful informed participation, information should be disclosed in appropriate manner and in the local language. Affected people are entitled to income restoration, livelihood improvement strategies, as well as Gender and Development strategy with clear timeline for measurable outcomes. This is in reference to the Safeguards provision that states: “to enhance or at least restore the livelihood of



Co Tu Minority conducting their rituals

affected people in real terms relative to pre-project level”.

***PHOTO RETRIEVED FROM

- * <http://www.trungsonhp.vn/images/home/images/DSC06142.JPG>
- * http://static.vovworld.vn/w450/Uploaded/truongiang/2015_04_03/tung%20tung.jpg

FORUM COMPLETES STRATEGY PLAN FOR 2014 - 2020

NGO Forum on ADB is set to implement its “Roadmap to Strategic Campaigning 2014-2020: Towards lasting and systemic change.”

The next six years will see Forum striving to effect systemic change within ADB, and by extension its clients so that they respond with greater accountability to the developmental needs and local contexts of Asian communities. Forum is committed to further advancing the rights and intervening in behalf of affected people, whose vulnerabilities have been increased by ADB’s skewed development agenda. A focal point for Working Groups and Member Organizations is strengthening the voice and capacity of the poor, women, ethnic groups and marginalized sectors.

PLANNING PROCESS

Forum began strategizing on its framework, campaign plan and organizational design in December 2012 by way of a preparatory meeting in Bangkok, Thailand. After the country and regional meetings were conducted the process culminated in November 2013 through an implementation workshop in Silang, Cavite, Philippines.

The International Committee (IC) / Board of Trustees and the executive director guided the long term strategy planning process. A strategy team, comprised of a lead strategist, the IC convener and Secretariat staff, oversaw the conduct and completion of the year long planning.



The end-result of this intensive, participatory and dynamic process is the “Roadmap,” which effectively supersedes the Long Term Strategy Plan of 2006.

COUNTRY CONSULTATIONS

Strategy meetings were held in Armenia, Bangladesh, India, Indonesia, Mongolia, the Philippines, and Sri Lanka. A sub-national consultation took place in Northeast India. There was a reporting of country situationer on Cambodia, Myanmar and Nepal in the 2013 Forum Annual Meeting.

Country Working Groups took cognizance of national perspectives in planning campaign activities concerning ADB-related issues. Members strategized on how to achieve network expansion and reactivation, increased public pressure on the Bank, and sustainability of campaigns in their respective countries.

REGIONAL CONSULTATIONS

Strategy planning occurred in the regions of Central Asia and Caucasus (Bishkek, Kyrgyzstan), Southeast Asia (Bangkok, Thailand) and South Asia (Dhaka, Bangladesh). A sub-regional grouping meeting for Mekong participated in by delegates from Cambodia, Vietnam and INGOs based in the region was also held in Bangkok.

Regional Working Groups prioritized key thematic areas, including transboundary linkages, where

synchronicity and complementarity in advocacies can be established. This enabled them to develop a five-year consolidated plan of action and intervention.

SIX-YEAR STRATEGY PLAN

The “Roadmap” guides Forum in operationalizing ongoing and future regional thematic campaigns. It provides a mechanism for monitoring and managing the impact/s of its advocacy work. Similarly, it serves to further Forum’s learning vis-à-vis the impact results of its actions.

Forum is building on and adding value to advocacies in Central Asia, Southeast Asia and South Asia on five working themes: water, energy, climate change, urbanization and human rights. Safeguards (environment, involuntary resettlement, Indigenous Peoples) and gender have identified as cross-cutting issues.

It is expected that by 2020, the voice and agency of the people of Asia, especially the poor and marginalized, has been raised at a sustainable capacity to engage the ADB towards more lasting and systemic change. This is because Forum has effectively pushed the ADB and its borrowers to become truly accountable, transparent, open and ready in their constructive dialogues with civil society and other stakeholders.

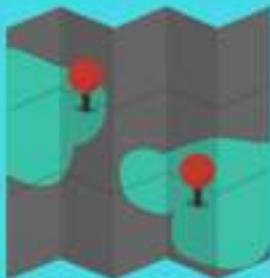
FAST FACTS

ADB FUNDED PROJECTS IN ARMENIA

There are 42 ADB funded projects in Armenia



ADB has been in Armenia since 2006, its first project was the Preparing the Rural Roads Rehabilitation Project



Of the 42 projects, 20 are approved, 5 are active and 3 were proposed.



36 OF THE PROJECTS ARE SOVEREIGN, LOANS EXTENDED TO THE GOVERNMENT OR GUARANTEED BY THE GOVERNMENT.



Holding ADB accountable since 1992

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