



21 January 2008

Ms. Ursula Schäfer-Preuss  
Vice President Knowledge Management and Sustainable Development  
Asian Development Bank  
6 ADB Avenue, Mandaluyong City 1550  
Metro Manila,  
Philippines

**Re: Call for a Suspension in Consultations on draft Safeguard Policy Update**

Dear Ms. Schäfer-Preuss,

We are writing to share our concerns regarding the ADB's Safeguard Policy Update (SPU). A number of organizations, including the Bank Information Center (BIC), have been closely following the safeguard review since it was first announced in August 2005. Representatives of BIC had the opportunity to meet with you in October 2007 just before the draft SPS was released. All of our organizations fully support the ADB's stated goal of strengthening its policy framework to "promote the sustainability of project outcomes by protecting the environment and people from potential adverse impacts of projects."

We strongly believe, however, that the current draft policy statement will not lead the ADB towards this goal. We therefore recommend that the ADB halt the current round of consultations, process the extensive input provided to date, and resume consultations on the basis of a strengthened draft.

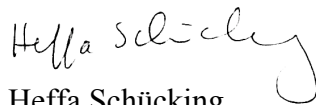
The October 2007 Consultation Draft of the Safeguard Policy Statement (SPS) contains many fundamental weaknesses, does not upwardly harmonize with policies of other IFIs and its requirements do not meet many relevant international law and best practice standards. The draft replaces the ADB's detailed and currently mandatory environmental safeguards with one page of mandatory general "policy principles" which in many instances are much weaker than existing requirements and subject to wide interpretation. There are also numerous gaps between the policy principles and corresponding implementation requirements for borrowers and clients. Furthermore, the proposal to aggressively move to a country systems approach to safeguards far surpasses the more cautious approach being pursued by the World Bank.

We therefore believe that the October 2007 Consultation Draft of the Safeguard Policy Statement (SPS) forms an inadequate basis for stakeholder engagement and that continuing consultations on this flawed draft would be an inappropriate use of limited time and resources.

A number of nongovernmental organizations have offered extensive analyses of the October draft, available at <http://www.bicusa.org/en/Article.2851.aspx>. Given the extensive input provided to the ADB already, we propose that the ADB suspend the current round of consultations, produce a strengthened draft, and then devote its limited consultation budget to consultations on the basis of a strengthened draft.

We look forward to discussing this issue with you and would be grateful for a telephone appointment as soon as possible.

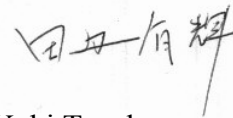
Sincerely



Heffa Schücking  
Executive Director  
Urgewald



Chad Dobson  
Executive Director BIC



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Program Coordinator  
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