



Preliminary Observations on the ADB's EAP by the Alliance for Climate Justice and Clean Energy (ACJCE)

We, the Alliance for Climate Justice and Clean Energy (ACJCE) are a coalition of Pakistani CSOs working on issues of climate and energy transition across Pakistan. In this note we submit our preliminary observations and concerns regarding ADB's draft 'Environment Action Plan 2024-2030: Towards a Nature Positive Asia and the Pacific' (hereinafter referred to as the EAP or the draft). We do so with a clarificatory comment on a foundational weakness in the present process: We were not invited as formal stakeholders to this process by the ADB despite being in conversation with the ADB on several of its climate action programs and other projects. We were only made aware of the draft accidentally through word of mouth by other non-Pakistani CSO's who forwarded the email thread to a member of the coalition on the eve of the consultative zoom meeting. Accordingly, we hope to be allowed to submit a more comprehensive and developed set of comments on the draft at a later date. We also note the absence of a consultative roadmap and guidelines that details how CSO inputs will be incorporated into a re-designing of the plan. These submissions are prompted by our commitment to environmental sustainability in the hope that ADB will provide such a roadmap and give due consideration to our inputs for a stronger action plan.

The draft EAP suffers from an inadequate contextualization of the climate challenge

The EAP aspires to serve as a strategic response to the triple planetary crises facing humanity: biodiversity loss, pollution and climate change. To avert that crisis, the EAP proposes two distinct but complementary approaches in broad terms: nature positive investment and mainstreaming environmental sustainability into sector operations. The importance of regional cooperation on several registers among member countries of Asia also figures in this approach. We feel that this characterization and approach to the climate question lacks attention to the historical context and factors that gave rise to the crisis in the first place. The role of extractive first world economies, colonization and neo-colonial practices, and the structural inequalities built into the global financial architecture (including multilateral development banks like ADB) are missing from this equation. Attention to these factors is necessary for a more informed account of the structural elements and exacerbatory factors making up the climate challenge. Such contextualization is significant for a meaningful strategization of how the EAP intends to operationalize the basic principles of climate action. This includes principles such as the 'polluter pays' and 'precautionary principle,' as well as the principle of 'common but differentiated responsibility' which lies at the heart of the Paris agreement. Any environmental action plan that is developed without adequate attention to these principles is bound to be weak and insufficient or worse counter-productive.

The draft EAP is missing important appendices and uses technical and opaque terminologies without clarifying their content and scope of application



The draft EAP – at least the one that has been shared with us in the afore-mentioned email thread – lacks the appendices to which the report refers. We made every effort to locate them online at the ADB’s website, however, they are nowhere to be found. In the absence of substantive details of the action plans supposedly provided in the absent appendixes, the document remains opaque and ambiguous on a number of fronts making it difficult to formulate meaningful inputs. We also note the use of technical terminologies and catch all umbrella terms like “nature-based solutions” or “innovative finance modalities” etc. These concepts are often unclear in terms of their precise referents and can be open to multiple interpretations.

The draft EAP suffers from an inadequate contextualization of the climate challenge

Early on the document rightly points out that a healthy environment is crucial for the survival of the planet and prosperity of people. It also delves into the reasons that have deteriorated environmental degradation in Asia which include: urbanization, intensification of agricultural practices, rising energy use, production, consumptions patterns and behaviors. Additionally, it bemoans the lack of capacity of developing member countries in tackling the climate crises. Without underplaying the importance of these factors, we find the diagnostic analysis to be short on several fronts. In particular, the diagnoses conveniently omits all mention of the advisory, technical, and financial roles of MDBs – and the ADB on particular – in bringing about the catastrophe that we see everywhere in Asia, particularly in South Asia and Pakistan. Is this omission knowing and strategic or is the ADB open to acknowledging and accounting for its own role in ecologically damaging interventions? Healthy environmental action plans must begin from a place of self accountability and a willingness to acknowledge historical errors and offset their impacts. It is probably because of this unfortunate omission that the draft document makes no mention of remedial measures aiming to address numerous failures in the ADB’s own legacy projects. This lack of acknowledgement runs through the entire document which conveys the impression that all the remedial measures proposed by EAP spring from faultless climate leadership and high minded aspirations and not because of the ADB’s own responsibility for some of the problems.

There are various analytic and methodological limitations in the draft EAP

The Environment Action Plan draws its strength from an integrated approach to addressing planetary crises. It emphasizes nature-positive investments, pollution prevention activities, and the mainstreaming of environmental sustainability into national and transnational policies, which are expected to help avert the climate crisis. The theory of change presented by the ADB reiterates the importance of nature-positive investments and suggests a paradigmatic shift in the legal and cognitive frameworks of the state. However, the plan does not clarify the methodological principles undergirding this approach. For starters, the concept of climate justice is entirely absent from the equation. The plan fails to detail how the Bank intends to address issues of equity in its Country Partnership Strategies. It also fails to clarify how the latter strategies will extend to sub-provincial and district levels and whether divestments from climate negative infrastructures will accompany investments in climate positive projects. It is unclear if this can even be called a transition plan, as



there is no mention of phasing out harmful projects and practices. The plan seems to address environmental sustainability and climate change as disconnected notions, without explaining their impact on society and stakeholders. There is also a failure to disclose the methods and analytic assumption and related climate risk analysis underpinning the EAP. Additionally, implementation plans appear to be taken for granted. Developing Member Countries (DMCs) require a wide range of technical and financial assistance—not in the form of debt—to advance climate-friendly initiatives, yet the plan does not provide any plans or commitments on this front.

Moreover, the plan is definitionally weak and ambiguous. While such ambiguity may serve a constructive purpose for the ADB, it is disastrous for us. For instance, the unsubstantiated inclusion of hydropower in the definition of renewable energy (RE) is particularly problematic and demands immediate reconsideration. Additionally, if the ADB is genuinely interested in restoring coastal ecosystems, including mangroves, under the nature-based solutions framework, it must acknowledge a critical factor: coastal ecosystems thrive on the balance of freshwater and salinity brought by rivers. Without the decommissioning of mega dams, there is no hope for the true restoration of these coastal ecosystems.

Addressing policy gaps, weak consultative practices, and historical accountability in ADB's EAP

Given ADB's extensive involvement in harmful policy frameworks an examination of the latter frameworks must underpin all future efforts. While key topical areas for the Country Partnership Strategy (CPS) can be highlighted, the real impact will hinge on ADB's methodology in preparing the CPS. It is vital that ADB includes communities affected by past operations, learns from previous failures that harmed vulnerable groups, and involves CSOs in shaping its climate agenda. These actions are essential for course correction, not only for future projects but also in addressing historical shortcomings. Moreover, it remains unclear whether ADB intends to review existing projects for alignment with planetary crisis mitigation goals. If not, there must be clarity on how future projects will be managed. Addressing these past issues is crucial; without doing so, ADB's relationship with both people and the environment remains in doubt.

Concrete commitments to phasing out fossil fuels is missing

In Paragraph 45, while we appreciate ADB's support in remedying legacy pollution at contaminated manufacturing and disposal sites, we must emphasize that the plan lacks concrete targets. For instance, there is no reference as to how countries will be enabled to achieve their NDC targets. The mere focus on pollution prevention and control is not optimum. These measures are insufficient as they fail to address the root cause: the continued reliance on fossil fuels in the energy and industrial sectors. Pollution prevention technologies are inadequate in mitigating the severe crises these projects inflict on communities, such as contaminated aquifers, degraded soils unfit for cultivation, and a host of respiratory and other health issues. We strongly urge ADB to unequivocally commit to phasing out fossil fuels and to assist countries in transitioning to renewable energy sources. We also



urge ADB to withdraw from Projects like Turkmenistan Afghanistan Pakistan and India (TAPI) gas pipelines immediately so that the transition to REs can take place.

Inclusivity and Stakeholder Engagement

While the EAP boasts of drawing upon over five decades of environmental, social, and related expertise of the bank, it is crucial that the bank also reflects on its failures to which it has been made well aware by affectees through a number of ways. For the preparation of this document, the EAP also claims to have consulted with the external stakeholders without specifying who they were. The document could be more explicit about how CSOs and other stakeholders will be involved in all the subsequent steps including the country specific diagnostic reports, decision-making processes, monitoring, and the implementation of specific projects. This is especially true when it comes to the integration of climate affected communities and indigenous peoples in the broader process. Without their involvement, there will be and cannot be any ownership for the plan.

The EAP recognizes the importance of consultation with the local and indigenous communities in decision-making processes. However, we have observed these consultations are limited to hand-picked CSO. Case in reference is this very document The EAP. As earlier noted, were it not for the courtesy of our colleagues abroad we would not even have heard about this document. We want ADB to make its consultative process more robust and open to all. Ideally, these kind of documents should also be translated in local languages in accordance with the best standards of consultations.

In our experience, the voices of the local communities even if heard are seldom incorporated and given deference to in the decisions. When it was busy in developing/enacting its Environment Policy (2002), ADB was implementing phase-III of Chashma Right Bank Canal (CRBC). The local communities were raising serious concerns against the canal design and structure. Their major concern was that the canal structure will obstruct the flow of hill-torrents and induce flooding. The ADB was holding meetings with the concerned community representatives but didn't pay any heed to their concerns. Eventually the communities' concerns proved true in 2022 when the excessive water in hill-torrents caused severe flooding and washed away the structures of ADB-funded canal.

In the light of this experience, recognition of participation of the indigenous communities in EAP appears to be quite dubious to us. The EAP document doesn't bring any clarity whether the participation of local/indigenous communities will be meaningful or just continue to be token/symbolic.

The EAP needs to prioritize grant based climate finance

While we agree with the ADB that there is a need for innovative finance to tackle the nature and biodiversity losses, however, they cannot be green bonds or blue bonds as mentioned by ADB in the draft. They will merely add to a country's debt burden. Pakistan is no stranger to the high rhetoric of



the necessity of including climate perspectives into the public finance management from IMF and WB. However, what it needs is concrete funds and action i.e. the provision of non debt based instruments and grants to meet the challenge of the climate head-on and not more debt breaking the back of its economy and poor beyond redemption. The case of IMF is a classic example where under the pretext of climate compliance it only pushed austerity measures during days when the flood was already wreaking havoc over 1/5th of Pakistan. It is high time that ADB take the lead and realize that debt and climate emergency cannot walk hand in hand. For the climate to become better, it is essential that debt is restructured. We propose ADB to consider other innovative financial forms to achieve the target set forth in the document such as community based grant programs and some specific equitable arrangements under debt for nature swaps.

Strengthening Pakistan's environmental legal framework for midstream and downstream interventions

For downstream interventions, there is a pressing need to reform Pakistan's existing environmental legal framework, which has proven inadequate in addressing environmental challenges. Currently, projects often reach completion before receiving approval from Environmental Impact Assessments (EIA), with the approval process falling victim to regulatory capture by corporate giants. To address this, environmental protection bodies must be made independent, capable, resourceful, responsive, and powerful. Furthermore, Pakistan still operates under the outdated Land Acquisition Act, which neither provides sufficient compensation nor mandates resettlement and rehabilitation. Transforming this act into a more people-friendly law is urgently needed. The purpose is not to be exhaustive here. When the stage comes and hopefully ADB invites us to express our experience around it we will be more exhaustive and comprehensive.

Urgent overhaul is needed for ADB's safeguard policies in non-operational departments

The EAP notes the importance of non-operational departments in the success of the EAP. We could not agree more with that. We want to press upon the Bank that the overhaul of ADB's non-operational departments, particularly the Safeguards Office, is long overdue. We have repeatedly observed that ADB's safeguard policies fail to ensure meaningful consultation during the project design phase, timely provision of project-related information to affected communities, and adequately address the gaps in environmental and social impact assessments. The recent revisions to these policies have also granted more flexibility to borrowers and clients in implementing environmental and social safeguards, which could lead to reduced accountability, inconsistent application of standards, and higher risks of environmental degradation and social harm.

Furthermore, the grievance mechanism also needs to be strengthened and retrospectively applied. Currently, affected communities have around two years after project closure to file grievances. For large projects, especially in the energy sector, this timeframe is too short, as many issues may take



longer to surface. The success of the Environment Action Plan (EAP) is heavily dependent on how ADB revises and strengthens its safeguard policies.

Prioritizing energy transition in the EAP framework

Figure 5 of the EAP highlights three interconnected, mutually supportive pillars and sub-areas, all of which are undeniably significant. However, in terms of priority, we place energy transition at the top. Unfortunately, this critical area receives the least attention in the document. There is an urgent need to revive the energy transition mechanism in Pakistan, prioritizing the early retirement of the most polluting plants or those in the pipeline, and replacing them with cleaner energy projects.

Ensuring genuine benefits and commitment in environmental projects

We want to emphasize that the benefits from nature-based projects must directly reach communities and avoid causing harm to either people or the environment. The discourse is silent on these fronts. We also want to emphasize that the priority and focus should be to preserve existing mangroves along Sindh's coast. Newly planted mangroves do not match the effectiveness or

Despite ADB's commitments to biodiversity conservation and other environmental initiatives, there is concern about the continuation of fossil fuel-based projects, which exacerbate the climate crisis. Without a robust plan to phase out fossil fuels, including gas, across all sectors—mining, transportation, and import—there is a risk that other efforts will merely serve as greenwashing. A genuine Environmental Action Plan must include a firm commitment to halting fossil fuel projects to ensure meaningful environmental progress.

The draft EAP doesn't recognize social/environmental injustices

The current global/regional/national/local crisis of environmental degradation and climate change is the result of an economic model that has evolved after European Industrial Revolution in 1750s. Extraction and combustion of fossil fuel was major force behind the industrial revolution, making excessive exploitation of natural resources and economic growth possible. If it created new economic opportunities on the one hand, the industrial revolution caused new forms of dispossession and impoverishment in the world. Along the Industrial Revolution, there came colonization of the land, resources and peoples of African, American and Asian countries by the European colonialists. The industrial growth and colonization not only caused environmental crisis but also created some new forms of and reinforced existing social inequalities at the local/regional and global levels.

The twin crisis of environmental degradation and climate change has disproportionately impacted the rich/powerful and the poor/weak. It resulted in unequal distribution of benefits and burdens. Despite having contributed less to environmental degradation and climate change, vulnerable communities often bear the brunt of their negative impacts. The remedies being devised to address the root causes of environmental degradation and climate change must take the broad range of social and environmental injustices into account.



The ADB's Environmental Action Plan doesn't recognize the unequal distribution of benefits and burdens resulting from environmental degradation and climate change. Without this recognition, the EAP is most likely to further enhance the social inequalities and environmental/climate injustices.

The draft EAP does not appear to recognize the significance of indigenous knowledge:

The EAP recognizes the importance of technical/scientific knowledge for addressing the crisis of environmental degradation and climate change but it ignores the knowledge of the indigenous communities depending upon different ecosystems for their lives and livelihoods. We believe that indigenous communities are facing some of the most severe climate impacts. Indigenous communities' identities are deeply interwoven with the land, water and other locally available natural resources. The ADB's EAP must respect and support their diverse ways of being and knowing. Our realization is that only the convergence of scientific and indigenous knowledge can provide viable solutions to the crisis of environmental degradation and climate change. To address the environmental and climate crisis, we demand the ADB to recognize the significance of indigenous knowledge and meaningful collaborations with the indigenous communities in its EAP.

The EAP doesn't elaborate 'sustainable agriculture'

The ADB vaguely mentions initiatives for 'sustainable agriculture' but doesn't explain what it means by it. Existing agriculture practices involve monocropping as well as extensive irrigation and extraordinary use of chemical fertilizers and pesticides. On one hand these agriculture practices have been releasing chemical toxins into the environment and causing biodiversity losses while on the other, they are becoming increasingly unaffordable particularly for the small farmers. Does 'sustainable agriculture' mean ending these environmentally toxic and economically burdensome practices?

Lack of clarity and inclusivity in ADB's approach to nature based solutions

The EAP emphasizes the importance of nature-based solutions, highlighting ADB's interest in ecosystem restoration. However, the document lacks clarity on how ADB defines these solutions and does not adequately address the risks associated with such projects.

- A. Defining Nature-Based Solutions: The document fails to provide a clear definition of nature-based solutions, which is crucial for ensuring that the actions taken under this pillar are effective. Without a solid understanding of what constitutes a nature-based solution, and without assessing the implications of those definitions, the expected outcomes may not be achieved. For example, the document mentions coastal restoration projects but overlooks the necessity of decommissioning dams to ensure the flow of freshwater to deltas. Unfortunately, the complicity of ADB in these projects cannot be ignored.



- B. Land and Ecosystem Restoration: Land plays a central role in ecosystem restoration initiatives, yet the EAP does not adequately address this aspect. While the focus on coastal belts is important, it is equally critical to recognize the various categories of land—such as rangelands, grazing lands, and common lands—that are vital for the indigenous life of local communities. These lands need protection, recognition, and the stewardship of the communities that rely on them. The displacement of local communities due to corporate agriculture or large-scale utility projects has already caused significant harm, and without careful consideration, the EAP could exacerbate this issue.
- C. Restoration of Unique Ecosystems: The document should also consider the restoration of unique ecosystems, such as the Dhands in District Badin, which once provided livelihoods to thousands of families. These ecosystems, formed at the intersection of freshwater and seawater, have disappeared and should be a priority for restoration under nature-based solutions.

The draft EAP lacks adequate focus on Human Rights and Social Justice

There is limited discussion on human rights and social justice, particularly in relation to environmental governance. CSOs are often concerned with ensuring that development projects do not lead to the displacement of communities, loss of livelihoods, or other negative social impacts. Impact: The absence of a strong human rights framework could undermine the plan's ability to achieve truly sustainable and equitable development outcomes.

The draft EAP does not provide a reliable framework for integrating the principles of Transparency and Accountability

The document does not clearly outline how CSOs and other stakeholders will access information or participate in the monitoring and evaluation processes. Transparency is critical for CSOs to effectively hold ADB and other stakeholders accountable.

The Impact: Without clear mechanisms for transparency and accountability, there is a risk that the plan's implementation could lack the necessary oversight to prevent environmental and social harm.

The draft EAP lacks any discussion on the role of Community-Led Solutions and Local Knowledge

While the document recognizes the value of local knowledge, it does not sufficiently emphasize community-led solutions or the role of CSOs in implementing these solutions. There is a risk that top-down approaches could dominate, potentially marginalizing community-based initiatives.



The Impact: Failure to fully integrate community-led solutions could result in less effective and sustainable outcomes, as local communities may not fully buy into or support externally driven projects.

The following member organizations of the Alliance for Climate Justice and Clean Energy (ACJCE) have endorsed these comments:

S#	Organization Names	Logos
1	Indus Consortium for Humanitarian, Environmental And Development Initiatives	
2	Alternative Law Collective	
3	The Knowledge Forum	
4	Policy Research Institute for Equitable Development (PRIED)	
6	Lok Sujag	