

ADB Funded Coastal Climate Resilient Infrastructure Improvement Project (CCRIP), complies neither with its own policy nor of Bangladesh

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Bangladesh is one of the most vulnerable countries in the world from anthropogenic climate change aspects. The country placed on top of the several vulnerability indexes. And the people of the country are not totally responsible for this destructive climate change. In response of the devastating impacts of Climate Change, Bangladesh Climate Change Strategy and Action Plan (BCCSAP) endorsed by the government in 2009 as a supra-policy and the document said that all related sector policies will be revised to make coherence with BCCSAP. BCCSAP clearly states that all climate-related activities shall be taken and implemented according to the defined actions listed in this document. The document also assured that Bangladesh shall not take any loan to implement climate adaptation and mitigation projects.

So far ADB is funding for some 32 projects on climate change in Bangladesh. Most of the projects are simply renamed or repackaged and added the term 'Climate Change' with the project, nothing more. One example is 'Khulna Water Supply Project' which has been changed to 'Climate Resilient Water Supply in Khulna City', same thing happened in '2nd Crop Diversity Project', 'Small Scale Irrigation Project' and 'coastal town infrastructure project'. One of the long term climate related project is Coastal Climate Resilient Infrastructure Improvement Project (CCRIP) which is to implement from 2013-2018. This 151 million USD project is funded under PPCR and ADF. It is also co-financed by International Fund for Agricultural Development (IFAD) and German Development Bank (KFW).

ADB provided PPTA to develop the project and now providing a total of 50 million USD for project implementation. 10 million of the fund will come as grant from PPCR of CIF and 20 million loans from ADF and other 20 million loans from PPCR. The people of Bangladesh are paying a lot due to climate crisis. And now they are trapped by the loan burden. But the point is the loan is a clear violation of Article 53 of BCCSAP, so it is illegal and unethical. ADB can say that it is our government's responsibility to ensure coherence with the policy, but ADB is also responsible to respect national legal arrangements.

There are three sub projects which are going to implement under the CCRI Project. One of those are 5.4 kilometre long Dhalirkanda to Bashtala Bazaar Upazila Road construction. According to BCCSAP, this project is not related with climate change management rather a typical development project like other transport and infrastructure projects. So it should not be funded from PPCR or any other climate finance. Each and every project can be made 'Climate Resilient' by changing approach and techniques. That doesn't mean that it is needed to finance from climate funds.

After signing an agreement between Bangladesh Government and ADB to implement this project in last September 2012, we conducted a survey in the project site to identify people's perspective on the project. We are sharing some key points on the sub project:

- a) According to Public Communication Policy (PCP), ADB is liable to disclose all details on the project before implementation. But it is found that only 3.7 percent of

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local people know about the road, nobody of them know who is funding, what is the mode of fund etc. Even the higher local government representatives like Upazila Chairman and Vice Chairmen don't know from where the fund is coming.

- b) ADB has been saying that it is concerned about Climate Induced Migration or climate refugees in Asia especially Bangladesh. Contrarily 125 people will be displaced due to this very small climate resilience sub-project under CCRIP. Where will they go? 58.4 percent of the people said that they will resettle in nearby cities which are already overloaded by migrants and these people will be addition in huge number of climate refugees in future. So, it is an important question that how the project is climate resilient or how it reduces the climate hazards?
- c) Only 6.2 percent can remember some university students conducted a quick survey and asked some questions on importance of the road and the people said that a road will be very effective as they didn't know from where the fund is coming and what the purpose of this fund is. So, it is clear that local people are not clearly informed about the sub-project which is a violation of "Free Prior and Informed Consent (FPIC)".
- d) None of the local people knows about ADB's Accountability Mechanism (AM), PCP or Safeguard Policy Statement (SPS). They don't know even the Resettlement Plan (RP) of the sub-project. So, they are totally in dark about the submission of compliances to inform their disagreement about project activities. How the project will ensure peoples participation, it is a big question.

So, on behalf of the civil society and community people, our demands are:

- a) Cancel all loans in climate change sector and stop repackaging or renaming typical development project;
- b) Undertake projects according to BCCSAP and don't push mitigation avoiding adaptation and
- c) Ensure Free and Prior Informed Concern (FPIC) of the people before implementing any project.

All MDB's are responsible to respect the country's policy and legal systems. The last but not the least, people have legal right to know the detail of all projects of MDBs.