

Dear Study Group on Environmental Guidelines for JBIC,

I would like to give comments on Japan's NGO recommendation on unifying JBIC Environmental Guidelines. In principle, you strongly urge an independent assessment on environmental, social and human rights impacts of every infrastructure projects that JBIC may approve. Your recommendations are so comprehensive. Well done!

However, regarding your strategy to play around the "independence" of the assessments, I hesitate to fully agree with your proposal:

1. "good practices of the World Bank": in article 3, you state  
Make use of those standards and good practices of the World Bank/IFC OECD/DAC etc. that are internationally recognized.

I understand that international pressure could be helpful in promoting the national banks like JBIC to adopt a better standard on human rights and environment. But under the international campaign against the bad practices of World Bank, it sounds that you support the legitimacy and current practices of WB. I suggest you to avoid making use of "World Bank" in your strategy. Another way to improve is to elaborate the term "Good practices" (what are the "good practices" meant?).

2. "environmental and social experts": in article 14, you state  
a. Should be conducted by environmental and social experts

Experts are not all independent. They can be biased or even corrupted. Moreover, who will decide which experts can conduct the assessment? Hence, I suggest to set up a mechanism on expert selection process, which should be publicly consulted, recognized and made open.

In addition to these two main points, I would like to mention some other minor points:

1. English: I am not sure if which version, Japanese or English, of this recommendation is more important. Would you mind carrying out spelling and grammar check in the English version?
2. Category A projects: in article 8, this term was mentioned without explanation,

prior to the explanation in article 9. Would you move the explanation to the top or article 8?

3. Environmental Office: (in article 11) Do you mean the Environmental Office in Japan, or within JBIC?

4. Resettlement: in article 18, you mention: Resettlement should be monitored. I just wonder who will monitor resettlement. JBIC alone, or an independent body?

5. "unforeseen environmental impacts": (in article 27) I just wonder if JBIC has that ability to predict and consider "unforeseen environmental impacts". should it be "unforeseen" or "unforeseeable"??

Sometimes my wording may sound a little bit offensive. Please forgive me if any. I also welcome your feedback. Good Luck!

Cheers,

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