

October 25, 2021

President Jin Liqun
Asian Infrastructure Investment Bank

Dear President Jin,

On the eve of the AIIB 2021 annual meeting, we the undersigned civil society organizations (CSOs) are raising concerns about the Bank's inadequate handling of gender issues, including neglecting its critical intersection with the global climate crisis. While the worsening climate crisis threatens and affects all humanity, it does not do so uniformly. Existing gender inequalities, resulting from persistent gender discrimination, aggravate gender-differentiated climate change impacts. Marginalized gender groups, especially women and LGBTQ people, are disproportionately impacted. CSO case studies on AIIB operations highlight such harmful gender impacts, for example the Bangladesh Bhola gas power plant and the India Gujarat rural roads projects summarized in, "**Unmet Gender Promises: making IFI projects and policies deliver on gender-equal rights**".

With a significant proportion of women working in agriculture and with natural resources as their primary sources of livelihood and unpaid care work, and with women's primary role producing and processing food and providing water and fuel to households, it is essential that the Bank address how climate change negatively impacts women, and how climate mitigation and adaptation investments can become more gender-sensitive. Environmental degradation disproportionately impacts LGBTQ people because their marginalized position in society makes them more likely to be poor, lack housing, and experience food insecurity and violence.ⁱ

Our intersectional climate-gender demands on the AIIB are increasingly critical since the Bank has become an influential global International Financial Institution (IFI) with operations spanning developing countries around the globe. Given already severe climate change impacts and the urgent need to reduce greenhouse gas emissions, we underline the urgency for the Bank to exclude all direct and indirect support for any links in the coal, oil and gas value chains including fossil fuel-related infrastructure. They harm people of all genders in differing ways, particularly women and LGBTQ people.

During many meetings CSOs have held with senior Bank managers since the AIIB began operations in 2016 and through multiple CSO consultation submissions on the Bank's draft 2021 Environmental and Social Framework (ESF), we have urged the Bank to adopt a mandatory, robust, freestanding gender policy that considers environmental and climate issues. By ignoring these requests, the Bank has remained an outlier among IFIs, most of which have a gender policy and/or standard. The Inter-American Development Bank's mandatory 2020 Environmental and Social Policy Framework gender standard commendably applies to all genders although it needs to strengthen linkages to the climate crisis.

In contrast, the AIIB's updated 2021 ESF embraces some but not the most critical CSO demands required to ensure Bank operations prevent gender-related harms and promote gender equality benefits. The AIIB must improve upon its mostly non-mandatory ESF gender suggestions by adopting a mandatory, robust, freestanding gender policy. The Bank must systematically integrate gender dimensions into all activities including those addressing the environment and climate.

While the AIIB has tried to harmonize its approach on specific gender issues with other IFIs, these are mainly confined to the critical problems of gender-based violence and resettlement, because publicized World Bank scandals around these issues placed them squarely on all IFIs' radars. However, the recommendations below demonstrate the AIIB falls short on many other critical gender needs.

We call on the AIIB to implement the following specific recommendations:

- **Approve a freestanding mandatory robust gender policy** that “requires”, not merely “encourages”, clients to prevent harmful gender impacts and addresses the differentiated impacts and needs of all genders including women and LGBTQ people. The ESF fails to mention LGBTQ people at all despite their presence in project-affected areas where they are vulnerable to violence, discrimination, and exclusion.

- **Ensure all investments are implemented in a gender-responsive way** not only by avoiding reinforcing existing gendered exclusions and stereotypes (for example the gender-segregated division of labor and unequal access to employment) but contribute to reducing underlying inequality structures and power imbalances. In order to do so, project level **gender assessments and gender action plans must be mandatory and backed up by adequate human and financial resources and oversight.**

- **“Require”, not merely “encourage”, clients to incorporate gender issues into all environmental and social risk assessments** by identifying risks for all genders and enhancing monitoring, supervision and risk mitigation in projects which entail high gender risks.

- **Apply a gender-lens to all climate assessments**, recognizing that women and LGBTQ people who are most impacted by climate change must be prioritized in all mitigation and adaptation activities. While the updated ESF acknowledges that indigenous people and women play an essential role in “managing and protecting the environment, natural resources and biodiverse ecosystems” it does not “require” that operations address the disproportionate impact of climate change on women and LGBTQ people.

- **Require that clients obtain free, prior and informed consent (FPIC) or refusal from all project-affected people**, not just in indigenous territory but in all geographies, especially from highly vulnerable populations including women and LGBTQ people.

- **Ensure inclusion of women and LGBTQ people in consultations** through arranging secure meetings permitting views to be expressed freely without incurring possible reprisals against them. Document these consultations and publish results while respecting confidentiality.

- **Require gender-sensitive resettlement, livelihood restoration and other “compensation” measures**, especially for women and LGBTQ people, to avoid perpetuating or deepening pervasive gender-unequal patriarchal property, land ownership and use after providing them FPIC.

-**Expand the Bank’s gender budget to support dedicated gender-expert staff** to better address gender discrimination and support gender-responsive investments. Having two Bank social specialists working part-time on gender and other social issues is insufficient. Without full-time dedicated gender experts, complemented by a strong implemented gender policy, the AIIB lacks the foundations for operations to uphold gender justice and prevent harm. CSO case studies on AIIB operations highlight harmful gender impacts, for example the Bangladesh Bhola gas power plant and the India Gujarat rural roads projects summarized in "**Unmet Gender Promises: making IFI projects and policies deliver on gender-equal rights**", reflect inadequate gender funding, staffing and absent gender policy or standard.

- **Train all project staff and contractors** to promote gender-equal rights and prevent gender discrimination, sexual and gender based violence (SGBV) and harassment not only against women and girls, but also LGBTQ people.

-**Ensure project grievance redress mechanisms are sensitive to complaints made by LGBTQ project-affected people** who are not acknowledged in the updated ESF.

- Require systematic collection of gender-disaggregated baseline and subsequent monitoring & evaluation (M&E) data in all project activities and annual reports. The ESF requires that Environmental and Social Assessments include gender-disaggregated project data but "at an [undefined] appropriate level of intensity" and without specifically requiring gender-disaggregated baseline and subsequent M&E data collection. Also, overall annual report operational data, including on meeting the 50% climate finance target, must present gender disaggregated data.

- Guarantee gender-equal labor protections for women, men and LGBTQ people and ensure gender-equal hiring practices, and occupational health and safety protocols, which the ESF fails to do.

-Ensure the AIIB lives up to its international commitments including Sustainable Development Goals (SDGs) 5 - gender equality; 7 – access to energy; and 13 - climate action; and the Paris Agreement, to ensure all operations address gender-differentiated climate change impacts and energy access.

We the undersigned look forward to receiving positive responses to our recommendations,

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Accountability Counsel USA/Global
African Women's Network for Community Management of Forests (REFACOF) Cameroon
Armenian Forests Environmental NGO Armenia
Aube Nouvelle pour la Femme et le Développement (ANFD) Democratic Republic of the Congo
Bank Information Center USA/Global
Bangladesh Working Group on External Debt (BWGED) Bangladesh
Bretton Woods Project UK
CEE Bankwatch Network Europe
CEE-HOPE Nigeria
Center for International Environmental Law (CIEL) USA/Global
CLEAN (Coastal Livelihood and Environmental Action Network) Bangladesh
Crude Accountability USA
DAWN (Development Alternatives with Women for a New Era) Global
debtWATCH Indonesia
EcoLur Armenia
Forest Peoples Programme UK/Global
Foundation Earth USA/Global
Foundation for Environmental Rights, Advocacy & Development (FENRAD) Nigeria
Friends of the Earth US
Fundeps (Foundation for the Development of Sustainable Policies) Argentina
Gender Action USA/Global
Germanwatch Germany
Global Responsibility - Austrian Platform for Development and Humanitarian Aid Austria
Green Advocates International Liberia
Green Armenia Environmental Educational NGO Armenia
Health of Mother Earth Foundation (HOMEF) Nigeria
Inclusive Development International USA/Global
Initiative for Right View (IRV) Bangladesh
Latinoamérica Sustentable Latin America
Lumière Synergie pour le Développement (LSD) Senegal
Jamaa Resource Initiatives Kenya
Nemolchi.uz Uzbekistan
NGO Forum on ADB Asia/Global

Oil Workers' Rights Protection Organization Public Union Azerbaijan
Oyu Tolgoi Watch NGO (OT) Mongolia
Oxfam Global
Reality of Aid Philippines
Reality of Aid - Asia Pacific
Recourse Europe/Global
Rivers without Boundaries Coalition Mongolia
Turkmen Initiative for Human Rights Turkmenistan
Urgewald Europe/Global
Uzbek Forum for Human Rights Uzbekistan
VIVAT International Global
Women's Environment and Development Organization (WEDO) USA/Global

CC: Mses and Messrs Alexander, Bergman, Limitovskiy, Quan Zheng, Pandian;
Galan, Jones, Rechico, Sobrino, Sverdrup, Thompson and von Muller

ⁱ See "Violence on The Basis of Sexual Orientation and Gender Identity Against Non Heteronormative Women in Asia". International Gay and Lesbian Human Rights Commission Summary Report. February 2010. https://outrightinternational.org/sites/default/files/386-1_0.pdf