



30 January 2024

**Mr. Marvin Taylor-Dormond**

Managing Director, Complaints-resolution, Evaluation and Integrity Unit  
Asian Infrastructure Investment Bank

**Cc: Mr. Shamas-ur-Rehman Toor**

Senior Project-affected People's Mechanism (PPM) Specialist and Head PPM Secretariat  
Asian Infrastructure Investment Bank

**Re: Stakeholder Engagement Plan for the Project-affected People's Mechanism Review of the Asian Infrastructure Investment Bank**

Dear MD Taylor-Dormond,

Thank you for the opportunity to comment on the Stakeholder Engagement Plan for the PPM Review and for the meeting with civil society last Friday. Unfortunately, with such short notice, very few civil society organizations were able to attend the call. As a result, we held an internal call to discuss our concerns with groups in the region and internationally and wanted to share our key concerns with you through this correspondence:

1. We welcome your assurance that the report of the External Reviewer will be publicly disclosed in April 2024, and that the report will not be subject to edits from Bank Management prior to its release.
2. We urge you to extend the comment period for the first draft of the PPM policy to the good practice norm of 90 days. We feel that holding the comment period in December and January would impact the ability of CSOs to comment and engage effectively in advocacy given holidays, Christmas and Chinese New Year. We propose a practical solution for this: to extend the comment period to start in the last two weeks in November and conclude in the first two weeks in February.
3. We would prefer for CSO submissions to be posted in their entirety on the AIIB's website. If this is not possible, then we would appreciate the stakeholder engagement consultant being responsible for making and posting summaries of our submissions on the AIIB's website.
4. We also reiterate the need to disclose the Approach Paper with adequate time for public comments.
5. We also seek your assurance that General Counsel will not circumvent, influence or affect the independence of this review. To this end we seek your clarification on their role throughout the review process.

We look forward to your response to our requests and again want to thank you for your constructive responses to our engagement with the PPM review.

With best wishes,

Accountability Counsel, International

Bangladesh Working Group on External Debt (BWGED), Bangladesh

CLEAN (Coastal Livelihood and Environmental Action Network), Bangladesh

Growthwatch, India

Indian Social Action Forum (INSAF), India

NGO Forum on ADB, Regional

Recourse, The Netherlands

Urgewald, Germany