

To Mr. Han Bin,

We are Greenwatershed, writing on behalf of Chinese NGOs working on green finance. Recently we noticed that certain standards in the first draft of World Bank's Social and Environment Safeguards are weakened compared with the existing safeguards, with no regard to the growing public appeal to the social responsibility of banks, although World Bank President Kim has promised that the proposed Environmental and Social Framework would not lead to any weakening of existing protections. Therefore, we are writing to you to express our concerns on this issue, and request you to return this draft to the management team of the Bank, and leave more time for the Bank to address the many concerns and feedbacks from people across sectors. Please kindly find our opinions as follows:

1. In light of President Kim's promise, the World Bank must guarantee this safeguard review will not weaken or eliminate environmental and social safeguards;
2. Aim at high levels of protection of the environment and people's livelihoods based on the application of international laws, especially those ratified by China.
3. To lower the safeguards standard of ex-ante project approval goes against the national environmental laws of China concerning EIAs and green credit policies.
4. It is strongly recommended to maintain the requirement for the bank to conduct its own due diligence and not to shift responsibilities to clients' self-reporting.
5. To be reliable, the safeguards policies should be based on specified rules, mandatory, contractually and legally binding.
6. For many ethnic minorities, the loss of traditional agriculture and fishery resources is in effect a loss of culture, which could result in social chaos, psychological trauma and increasing health risks. The IP policy should offer no opt-out option for the current binding policies concerning ethnic minorities in place.

We sincerely hope you could consider our suggestions above.

Green Watershed

Greenovation Hub

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