CEE Bankwatch Network

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To: Dr Yongping Zhai
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Asian Development Bank

Subject: ADB Draft Paper for Consultation, Energy Policy Supporting Low Carbon Transition in Asia and the Pacific, May 2021

June 30, 2021

Dear Dr. Zhai

Herewith, CEE Bankwatch Network provides comments to the ADB Energy Policy draft. We welcome ADB management efforts to align the policy with the Paris Agreement, including the commitment to stop financing new coal projects as well as accepting the need for a just transition and descendent role of fossil fuels within the sector. We appreciate the Draft proposing ADB to contribute to important developments as distributed energy production, role of prosumers, demand side management, district cooling and the challenge of decarbonising energy use beyond electricity (heating and industrial processes).

However, the draft policy will not be able achieve its principal goal to help ADB's developing member countries (DMC) establish truly sustainable and resilient energy systems, in line with Paris Agreement and Sustainable Development Goals (SDG). The options to finance projects in natural gas infrastructure, hydro power, incineration, and biomass are left opened. We will further go into details on this.

We are thankful for the number of opportunities to discuss Energy Policy-related issues with you and your team members prior to the publication of the policy draft. However, we would like to express our dissatisfaction with the actual consultation process since the draft was released. The policy consultation lacked well-arranged stakeholders' engagement and consultation process. We consider that there is clear need to conduct meaningful and proper public consultation meetings for the energy policy review in line best international standards.

We believe that the new Energy Policy needs to be clearly aligned with the Paris Agreement 1.5-degree goal, include phase-out of finances for fossil fuels while ensuring energy transformation that's in line with local communities and human rights approach needs.

The new draft Energy Policy sets four goals for energy transformation by 2030, including 1) support end-use energy efficiency via incentives and better policy, 2) to transform energy systems to low and zero-carbon, with digital technologies to help integrate renewable energy 3) to electrify the transport, industry, and space cooling and heating

sector 4) to encourage distributed renewable energy providers. Despite sounding progressive, ADB's Energy policy planed actions inconsistent with the achievement of the above-mentioned goals as well as with the major objective, which is to guide "ADB's energy sector operations to help DNCs develop sustainable and resilient energy system."

Fossil Fuel Free ADB?

The ADB draft Energy Policy does not commit the Bank to the complete phase-out of fossil fuels financing. We have to note that the Bank decided to exit from the direct coal financing and to stop financing the fossil gas upstream sector[1]. Unfortunately, it appears that the Bank still considers fossil gas as a 'transitional fuel' for electricity, heating, as well as industry sectors in its countries of operation.

The Bank still plans to finance fossil gas midstream and downstream, including generation and infrastructure under certain conditions. The ADB plans to "*finance natural gas projects, including gas transmission and distribution pipelines, liquified natural gas (LNG) terminals, storage facilities, gas-fired power plants, and natural gas for heating and cooking*".[2]

The ADB position is not aligned with the latest scientific evidence showing that fossil gas is a significant driver of global warming, not only because of the carbon dioxide released when gas is burned, but also due to the methane emissions that occur along the whole gas supply chain.

2018 IPCC special report on global warming of 1.5 ºC called for a radical transformation of the energy systems away from fossil fuels, if we are to prevent the worst consequences of climate change.[3] The latest International Energy Agency (IEA) roadmap to net zero by 2050 projects a significant decline in the demand of fossil gas in the period leading to 2050 if the climate targets are going to be met (55% in comparison to 2020).

The IEA in its' report from May this year dismissed the idea of fossil gas as a transition fuel. It has to be noted that the IEA was a strong proponent of gas before in its scenarios for energy sector. The IEA concluded that no new investments in fossil fuels extraction and many of the liquefied natural gas (LNG) liquefaction facilities, currently under construction or in the planning stage, are not needed.

Detailed screening criteria for Bank's lending to fossil gas infrastructure are yet unknown and it seems they are going to be defined after the energy policy adoption. According to the draft Energy policy, it is not clear if the Bank plans to have public consultations for their adoption or whether they will only be available to the Bank staff. Our recommendation is that detailed screening criteria for lending should be consulted on with the stakeholders and publicly available afterwards.

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[1] *"ADB will not finance... any natural gas field exploration, drilling or extraction activities"*, para. 86, ADB draft Paper for Consultation , Energy Policy Supporting Low Carbon Transition in Asia and the Pacific, May 2021

[2] Para 87 , ADB draft Paper for Consultation , Energy Policy Supporting Low Carbon Transition in Asia and the Pacific, May 2021

[3] **IPCC, Global Warming of 1.5C**

According to the draft Energy policy, the basic criterion for comparison with the renewables will be the project costs [4], considering the *"social cost of carbon"* (SCC).[5]

The ADB proposed baseline SCC is $36.8 (2016 dollars) per tCO_2, with 2% annual increase rate. The baseline value chosen by the ADB is significantly lower than the current average estimates (ca. $50 per tCO_2) – or even than the current values adopted by oil and gas majors (BP, Shell – $40, Exxon – $80).[6] Because the ADB proposed such a low baseline for SCC, renewables investments will likely appear more costly for the Bank than the investment into fossil gas, thus leaving the countries of operation with the possibility of renewables lock-out to the fossil gas technologies.[7]

The Bank's draft Energy Policy completely fails to address methane emissions that occur along the supply chain of fossil gas, from extraction to distribution. Over a 20-year period, the greenhouse gas methane is 84-87 times more potent than carbon dioxide. Methane emissions are especially relevant in the context of LNG fossil gas trading, which is important for the Banks countries of operation.

It is necessary to provide a clear investment signal to its countries of operation concerning the fossil gas phase-out timeline. Yet, the Bank has failed to provide any commitment to the phase-out from lending to gas.

DCMs carbon free future?

The draft Energy policy gives ADB a mandate to continue fossil fuels investment in DCMs. E.g. over the last decade, the Bank heavily invested in the development of gas infrastructure. Since December 2015, it spent more than 4.7 billion USD on natural gas related infrastructure, including pipelines, gas power plants and district heating renovations.[8] Unfortunately, the Bank continues to portray gas as a bridge fuel and including it in its draft Energy policy will likely lock out renewables development.

Uzbekistan, Mongolia and China belong to the ADB countries that have recent experience with ADB financing for gas-based district heating. In Uzbekistan, the ADB has not only provided more than USD 1.4 billion for new combined cycle gas turbines (CCGT), but in its advisory function is also supporting the Uzbek government with the rehabilitation of its gas-based district heating networks.

According to the ADB's independent evaluation of its energy policy for 2009-2019, Uzbekistan was the second-largest borrower, with three sovereign projects related to the installation of new CCGT groups at Talimarjan (total project cost of USD 1.1 billion) and Takhiatash (total project cost of USD 300 million) power plants. The ADB's investments in renewables are quite insignificant in comparison to its investments in gas projects and count only for 12% whereas 71% are put in the gas sector. [9]

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[4] "*i.e. natural gas power would be compared to renewables plus storage to provide the same level of service*", para 87 (ii)
[5] Maria Pastukhova, The Asian Development Bank's new energy policy: A work in progress (2021), available at; https://energytransition.org/2021/06/the-asian-development-banks-new-energy-policy-a-work-in-progress/
[6] Ibid
[7] Ibid.
[8] ADB, *Sector-wide evaluation - ADB Energy Policy and Program, 2009-2019,* August 2020.
[9] ADB, *Sector-wide evaluation - ADB Energy Policy and Program, 2009-2019,* August 2020.

In Mongolia, the ADB is trying to address the lack of sufficient heating supply for around 60% of the population that are not connected to the district heating system as well as heavy air pollution. Since 2014, the ADB has been providing technical assistance to the Mongolian government to support greater energy efficiency and improved air quality. This technical assistance has mainly gone towards ensuring the construction of a new coal-fired combined heat and power plant (project name: CHP5) through a public-private partnership (PPP) scheme. It also included up to USD 150 million allocated to the project's private sponsor. The technical assistance implementation report for the project (April 2020) recognised the project as less than successful, as CHP5 had not been constructed due to numerous changes within the Mongolian government. In the same evaluation report, the ADB recognises that *"both electricity and heat supply in the [clean energy sector] is still in a critical condition"*. To address this issue, the ADB has proposed a 125 MW large scale battery energy storage system along with the mobilisation of an additional 350 MW of renewable energy for electricity supply. In order to solve the heating problem, however, it states that the switch to a fuel cleaner than coal is imperative. The ADB is thus supporting the government with the preparation of "*[a] methane development master plan to explore switching to a cleaner fuel for heating and power generation*".[10]

The ADB continues to invest in gas both to produce electricity and for heating, but it has invested comparatively less in energy efficiency. The combined amount of financing for district heating and energy efficiency projects from 2009 to 2019 amounts to USD 6.1 billion, of which 42% went into investments in China. During the same period, financing for the 'energy efficiency' and 'sector development and reform' sub sectors, both of which include district heating projects, was concentrated in only a few early mentioned countries.[11]

According to the Sector-wide Evaluation of the ADB Energy Policy and Program 2009–2019, prepared by the ADB's evaluation team,[12] the 2009 policy did not address numerous issues that are highlighted under the ADB 2030 strategy. These include the promotion of energy efficiency in buildings, smart grids and electric vehicles, and access to heating and cooling systems that use renewable energy.[13] Therefore, the ADB should stop funding gas-based district heating systems and start following other MDBs that are choosing more efficient and innovative technologies that can address heating and cooling problems.[14]

It is important that, as a public bank, the ADB fully phases out fossil fuels and focuses its attention on renewable energy and energy efficiency solutions in order not to lock out investments into renewables and avoid creation of stranded assets. It should stop investments in gas both for electricity and the district heating sector, and rather prioritise innovative clean solutions that can be used in district or individual heating systems. In

[10] ADB, *Mongolia: Preparing the Energy Efficiency and Urban Environment Improvement Project*, TCP validation Report, September 2020. https://www.adb.org/sites/default/files/project-documents/46343/46343-002-tcr-en.pdf
[11] The ADB approved USD 42.5 billion for sovereign (USD 32.1 billion) and non-sovereign (USD 10.4 billion) projects in the energy sector during the period from 2009 to 2019. Electricity transmission and distribution (39 per cent of the total) was the dominant subsector, followed by conventional energy generation. Low-carbon technologies, including renewable energy and hydropower projects, accounted for USD 9 billion (21 per cent) of the portfolio.
ADB, *Sector-wide evaluation - ADB Energy Policy and Program, 2009-2019,* August 2020.
[12] Ibid.
[13] ADB, Strategy 2030: Achieving a Prosperous, Inclusive, Resilient, and Sustainable Asia and the Pacific
[14] Kira Taylor, '"Gas is over": EU bank chief signals phase-out of fossil fuel finance', *Climate Home News*, 21 January 2021.

2021, the ADB should announce the phase-out of coal and gas for all energy operations, including district heating, and assist DMCs to define zero-emissions targets.

The Bank should support governments in assessing and mapping available renewable resources, including solar, geothermal, and low-grade excess heat. It should further support improvements to the policy and regulatory framework such as third-party access, the energy efficiency of buildings, transparency of heat network pricing and the competition of heat production. Finally, it should provide countries with multiple options for integrating the heat and power sectors so that the system's costs and benefits become more comprehensible. This will support the development of the market based on a scientifically sound analysis of how to improve energy efficiency of district heating.

If the ADB greenlights fossil gas projects now, it will undermine any efforts to decarbonise the heating sector of Central Asia by 2050. Financing new gas infrastructure now instead of renewables will result in a delayed switch to renewable energy. Furthermore, because of the long lifetime of fossil gas infrastructure(e.g. power plants' lifetime may range from 30 to 50 years), these projects are likely to become stranded assets well before their lifetimes are over.

Alternatives to fossil gas district and individual heating – Does the Asian Development Bank (ADB) strive to be an innovation champion?

At the draft Energy Policy, the ADB acknowledges that '*Heating infrastructure is essential in most Central and East Asian DMCs. ADB, therefore, supports the construction, expansion, efficiency improvement, and rehabilitation of old district heating networks. Waste-to-energy plants can contribute to improved waste collection and sorting and is one supply-side option for centralized heat production*' and gives preference to '*district heating through centralized heat production—often in combined heat and power plants or using waste heat, heat pumps, geothermal and natural gas, and through district or city-wide insulated distribution networks—is more efficient and cleaner than decentralized heating in buildings by smaller coal-based boilers*.' The current approach by the ADB continues to consider gas as the transition fuel.

Thus far, the ADB has accumulated successful experiences with renewables-based district heating projects in China, including solar, geothermal, and combined gas and wind. In the city of Qingdao,[15] the existing coal-based district heating system was replaced by a low-temperature district energy distribution network with a smart energy management system supplied through a diversified combination of natural gas, solar thermal, geothermal, and waste heat from industrial plants.

In 2012 under its Clean Energy Program,[16] the ADB financed the 'Shanxi Energy Efficiency and Environment Improvement Project',[17] which replaced 232 small, old coal-fired boilers with five large, new coal-fired boilers in four counties in China. In total, four coal-fired boilers and one gas-fired boiler were installed. Although the ADB's promotion of a project that replaced coal boilers should be welcomed, its support for the substitution of coal

[15] **ADB, Webpage: China, People's Republic of Qingdao Smart Low-Carbon District Energy Project,**
[16] Asia Regional Integration Center, Webpage: Regional Public Goods - ADB Clean Energy Program.
[17] ADB, Webpage: China, People's Republic of: Shanxi Energy Efficiency and Environment Improvement Project ,

with gas is problematic solution. In 2020, the Bank approved the Low-Carbon District Heating Project in Hohhot, Inner Mongolia Autonomous Region[18] China with a hybrid heating system using boilers powered by natural gas and wind.

The Review of the ADB Clean Energy Program notes that from 2008 to 2018, '*[a]ll district heating projects were implemented in [China] due to the country's high demand for space heating. Interventions done in this sphere can be characterized by the use of low-carbon, low-emission, and energy-efficient district heating systems*'. Total expenditures were up to USD 1.1 billion.[19] The goal of these projects has been to reduce the dependency on coal as well as to increase energy efficiency. The Bank carefully researched the potential of solar district heating in China and concluded that it would have immense potential if the country's policies were to promote solar heating by easing the regulatory framework (land and technical regulations and financial incentives).[20] In general, to facilitate a switch in district heating towards more energy efficiency and renewables, governments such as China should establish clean heat targets, ensure low grade excess heat access as a structural energy efficiency measure, improve access to the network for third parties and increase the transparency of pricing (including for air pollutants, carbon emissions, etc.).[21]

Even though the ADB has significant knowledge and several positive experiences in this area, as well as information about positive experiences in countries such as Denmark,[22] it has neither significantly changed its approach within its own countries of operation nor in the new draft policy.

Unfortunately, the Sector-wide Evaluation of the ADB Energy Policy and Program 2009–2019 and the later draft policy does not assess the importance of a fundamental change of the heating and cooling sector from a decarbonisation perspective. Although it recognises that '*while natural gas is considered a cleaner fuel, it still contributes significantly to greenhouse gas emissions*', it does not recommend the ADB to fully phase out fossil fuels, but calls for the establishment of selection criteria for gas projects, which include that the projects must substitute coal, increase energy security through fuel and source diversification and provide system flexibility that expands the system's ability to absorb renewable energy. These are prerequisites for projects to contribute to direct poverty alleviation and local air quality improvement. [23]

Europe's experience with district heating shows that fourth and fifth-generation district heating systems do not need coal or gas.[24] The advantage of these systems is that they do not need to be designed as a single large-scale district heating system. Another

[18] ADB, Webpage : China, People's Republic of: Low-Carbon District Heating Project in Hohhot in Inner Mongolia Autonomous Region,
[19] ADB, *Review of the ADB Clean Energy Program*, Page 23, March 2020.
[20] ADB, *Solar District Heating in the People's Republic of China: Status and Development Potential*, July 2019.
[21] ADB, District Heating Business models and policy solutions: financing utilization of low grade industrial excess heat in the people's republic of China, December 2020.
[22] ADB, *Solar District Heating in the People's Republic of China: Status and Development Potential*, July 2019.
[23] ADB, *Sector-wide evaluation - ADB Energy Policy and Program, 2009-2019,* August 2020.
[24] Fourth and fifth-generation district heating operate on lower temperatures (and thus higher efficiency), incorporate seasonal storage and allow for the use of various sources of low potential waste heat (sewage water system, computer centers, etc. In Europe, such clean heating and cooling solutions are increasingly being implemented. These innovative solutions are based on a decentralised system that integrates multiple renewable sources into the grid, operates at low temperatures, includes heat/cooling storage for peak times, and relies on a highly efficient pipeline network and on a high degree of energy efficiency on the end users' side (insulated buildings, heat metering, temperature control, etc.). In some cases, these systems use gas or biomass, but only as a backup option for peak times in winter when the heat demand is very high. However, the modular nature of such systems allows for gas to be replaced with other sources during future peak seasons.

considerable advantage is that they can be used for both heating and cooling. In places where the construction of a district heating system is not justified (because of low population density, mild winters, long and complex construction processes, etc.), the focus should be on alternatives to a district heating system and meeting needs for individual heating and cooling. The sustainable cooling goals turn out to be especially important challenges in Asian countries.

Renewable Energy Development – Is it as sustainable as claimed?

According to the draft policy '*ADB will support a transition to cleaner power systems by supporting accelerated deployment of renewable energy including sustainable hydropower, 25 solar PV installations and concentrated solar facilities for power, solar energy from collectors to heat, and on-shore and off-shore wind power*'.[25] It's interesting that according to the document '*sustainability of hydropower can be assessed with the Hydropower Sustainability Tools governed by a multistakeholder body, the Hydropower Sustainability Assessment Council*'.[26]

It should be mentioned that Hydropower Sustainability Assessment Council (HSAC) has been created by the industry to dilute the World Dam Commission's recommendations.[27] The IHA Sustainability represents '*a not-for-profit sub-division of the International Hydropower Association*'[28] and '*manages and publishes the Hydropower Sustainability Tools under a mandate from the Hydropower Sustainability Assessment Council (HSAC) and its Governance Committee (HSGC)*'. Both, the IHA and the IHA sustainability council constitute of a self-selected group of industry representatives, government agencies, financiers, and large non-governmental organizations (NGOs), while civil society organizations from the Global South and dam-affected people are excluded. In November 2020, IHA announced the '*Consultation on a groundbreaking global sustainability standard for hydropower*', which is supposed to be adopted at World Hydropower Congress in September 2021. However, except for its name, there have been no 'groundbreaking' actions; no multistakeholder consultations, a clear language barrier, no advertisements and etc.).[29]

Therefore, the IHA sustainability standard does not work, as it did not withstand public and independent public scrutiny. The measures proposed by World Commission on Dams (2001) have been rarely implemented, despite their influence on international and national environmental legislation. For hydropower planning to become sustainable, governments and industry must prioritize transparency by inviting civil society organizations to the table to discuss the implementation of the Hydropower Sustainability standard in the context of each particular country and its energy matrix, while providing proof that it is environmentally, socially, and financially desirable and competes with different other types of renewable energy.

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[25] Para79, ADB, *Energy Policy Supporting Low Carbon Transition in Asia and the Pacific Draft Paper for Consultation ,May 2021*,
[26] IBID
[27] Greenwashing Dams, A critique of the Hydropower Sustainability Assessment Protocol (HSAP) , 2013, International Rivers
[28] IHA Sustainability
[29] Consultation on a groundbreaking global sustainability standard for hydropower

The ADB's draft Energy Policy defines support to "*large hydro power plants (including pumped storage) with seasonal storage reservoirs with multipurpose benefits*[30]*"* and projects promised to be chose '*highly selective*', based on best practices, including '*robust strategic environmental and social assessment*', locations and design alternatives and so on. However, the Greenfield hydropower already brought mass-scale destruction of communities and rivers across Asia. Water ecosystems, especially in Asia, are increasingly scarce and fragile, with ever-increasing human competition for exploiting their diverse resources. Therefore, it is important to ensure that the ADB would not finance the greenfield projects, while the motion to support '*DMCs in rehabilitating or replacing electrical, mechanical, and electro-mechanical equipment in these facilities*[31]*'* is welcomed because of the number of ageing hydropower plants in the regions.

Gender and Community Participation in ADB draft Energy Policy

We welcome the ADB's efforts to integrate a gender equality approach in its Energy Policy draft as well as its emphasis on the vitality of community participation in the development of off-grid systems. The draft policy rightly points out that '*Women are disproportionally affected by lack of access to clean and modern* energy *services*'. Hence, '*The services prioritized in ADB-supported interventions should consider their potential to empower women, such as through opportunities for earning and for the education of women and girls*'. [32] However, it should be stressed that poorly planned projects also have serious impacts on women's health, care burden as well as finances. Therefore, we also welcome the ADB's pledge that '*ADB's project designs should take into account women's participation and will act to prevent their exclusion from crucial decision-making related to project activities by the implementing agencies and project beneficiaries, such as by village and township authorities and community-based organizations. The ADB will promote energy-based livelihood and employment for women in project installation, maintenance, and operation, as well as encourage female entrepreneurs as private sector partners for the project activities*'.[33] The ADB should continue monitoring the application of existing gender tools and review them particularly in relation to the energy sector.

Furthermore, the ADB considers that 'community participation is vital' when 'bringing electricity service to a community'. However, community and public participation in the decision-making process should be promoted in any energy project and/or program. This approach is essential against the backdrop of the growing risks of existing backlashes against human rights and environmental defenders exercising their right to protest or oppose renewable energy projects, including cases in which companies respond with threats or violence.[34]

[30] Para 80, ADB draft Paper for Consultation , Energy Policy Supporting Low Carbon Transition in Asia and the Pacific, May 2021
[31] IBID
[32] Para 61, ADB draft Paper for Consultation , Energy Policy Supporting Low Carbon Transition in Asia and the Pacific, May 2021
[33] IBID
[34] Evidence shows that there is an urgent need to raise the bar on human rights in the renewable energy sector. Abuse allegations include killings, threats, and intimidation; land grabs; dangerous working conditions and poverty wages; and harm to indigenous peoples' lives and livelihoods. Allegations have been made in every region and across each of the five sub-sectors of renewable energy development: wind, solar, bioenergy, geothermal, and hydropower, Fast & Fair Renewable Energy Investments, 2019, Business and Human Rights Resource Center,

It is essential that ADB Energy Policy stresses human rights protection and ensures public participation in decision-making regarding both concrete projects and energy sector reforms. Accordingly, the Energy Policy should lead 'not just to zero-emission, also zero human rights abuses' during the energy transformation.[35] This can be reached only through well structured public participation process and the inclusion of affected communities in decision-making.

The policy should be based on the respect of human rights and not tolerate any human rights violations by its borrowers. It should require meaningful consultation processes with communities and workers, human rights due diligence processes, benefit-sharing schemes, respect of fundamental labour and indigenous peoples' rights. It should ensure local communities' rights, including land rights and free, prior, and informed consent over the project's lifespan, and effective access to grievance mechanisms at the project level.

Privatisation

The draft Energy Policy largely addresses private sector participation and prioritizes increased opportunities due to the DCMs energy reforms and plans to catalyze private sector involvement through 'private investments in energy efficiency and renewable energy projects in the region through direct financing to companies, banks financial intermediaries, and projects. To achieve this, ADB will use various tools, including loans and equity, credit enhancements, and risk mitigation instruments, such as in favour of foreign and local commercial banks lending to energy projects that contribute to sustainable, affordable, and secure energy supply in DMCs'.[36] However, the policy does neither recognize nor stress that funds should be provided to local community initiatives, energy cooperatives, or municipalities, etc. The narrow focus on private sector participation and the speed of privatization eclipses the enormous variety of types of ownership , which need to be promoted in order to achieve sustainability.

We would like to ask the ADB to

- Ensure transparent and meaningful public participation processes for the ADB's Energy Policy review in line with best international standards and practices that allow stakeholder's views to be heard, addressed and integrated in the final policy document.
- Stop all direct and indirect financing of fossil projects and prioritise sustainable decarbonisation and energy savings.
- Demand decarbonisation plans as a condition of investing in or lending to companies, which themselves or through entities they control currently rely on fossil fuels for their operations.
- Define specific financial instruments that would allow local communities, municipalities, public owned institutions, etc. to access finances for renewables development.
- Stop funding any new Greenfield hydropower plants.
- Support an environmentally and socially responsible decommissioning of fossil fuel power plants, including the development of just transition plans for affected regions.

[35] Stop burning our rights! What Goverments and Corporations must do to protect humanity from the climate crisis, 2021,
[36] Para 108, ADB draft energy policy

- Synchronise the efforts of MDBs, including the ADB, towards carbon neutrality in their countries of operation by incentivising the development of renewables and energy savings.
- Integrate human rights language in its Energy Policy and ensure further strengthening and policy coherence with other relevant policies, including the safeguard statement.