

The Asian Development Bank's Indigenous Peoples' Policy and its Impact on Indigenous Peoples of Asia

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The Scope of the Policy

The Asian Development Bank (ADB)'s policy on indigenous peoples is triggered when negative impacts of an ADB-supported project are anticipated.¹ In such a situation, "adequate measures must be taken to mitigate the negative impact, or make certain that a compensation plan ensuring that project-affected people are as well off with the project as without it".² The policy applies to both public and private sector operations.³ It defines or identifies indigenous peoples in a broad manner and includes one or more of the following:

- Descent from pre-state population groups;
- Maintenance of cultural and other identities, institutions, etc. that are distinct from mainstream society;
- Self-identification, identification by others and desire to maintain its cultural identity;
- Distinct linguistic identity;
- Orientation towards traditional economic systems; and
- Attachment to traditional habitats and territories.⁴

In addition, a working definition is employed as an operational tool, which reads:

"Indigenous peoples should be regarded as those with a social or cultural identity distinct from the dominant or mainstream society, which makes them vulnerable to being disadvantaged in the process of development."⁵

The ambit or scope of the application of the Asian Development Bank (ADB)'s policy on indigenous peoples is clarified in the document itself, which states:

"The policy, together with practices addressing indigenous peoples, **applies in parallel with and does not replace or supercede other ADB policies and practices.** Each of the **elements of the policy** and practice addressing indigenous

¹ Asian Development Bank, *Policy on Indigenous Peoples*, pp., 2, 9.

² Ibid.

³ Ibid., p. 17.

⁴ Ibid, p. 6.

⁵ Ibid. Case-specific identification may also be addressed at the stage of *Initial Social Assessment*. See also, pp. 6, 7 and Appendix.

peoples **are considered within the context of national development policies and approaches**, and the fundamental relationship between ADB and governments remains the basis for country-specific operations (emphasis added).⁶

To rephrase the above, the policy itself advises us that in order to understand the full implications of ADB-funded projects upon indigenous peoples, we must look, in addition to the specific policy itself, into the following: (a) other relevant ADB policies; (b) relevant ADB practices; (c) development policies and approaches of the borrower government; and (d) the nature of the relationship between the ADB and the concerned borrower government.

Therefore, it appears that although the ADB's indigenous peoples' policy applies equally to all its member countries, the nature of its actual impact on the ground would *vary from country to country*. It would depend upon such factors as the bank's numerous policies and practices in addition to its *Indigenous Peoples* policy, the relevant policies and practices of the borrower governments and the dynamics of the ADB-borrower relationship. Case studies of field-level experiences related to ADB-funded projects in areas inhabited by indigenous peoples would provide added insights into the matter under study.

Basic Elements of the Policy

One of the salient elements of ADB's Indigenous Peoples' policy is to "avoid negatively impacting indigenous peoples" through ADB operations. Where that is not possible, the policy is to provide "adequate and appropriate compensation".⁷ When substantial negative impacts on indigenous peoples are anticipated, the first step is to conduct an *Initial Social Assessment* or "ISA", which is mandatory for all ADB projects.⁸ The policy recommends that an ISA be initiated in the early stages of a project.⁹ The ISA addresses the key social dimensions of the project, as well as the needs, demands and capacities of the people concerned.¹⁰ It also identifies the project beneficiaries and the people that are likely to be adversely affected by the concerned project.¹¹

If the ISA determines that indigenous peoples are likely to be adversely impacted, or that indigenous peoples suffer from disadvantage or are otherwise vulnerable in the project intervention process, an *Indigenous Peoples' Development Plan* must be prepared by the borrower government or other project sponsor, to address the relevant needs or disadvantage, as the case may be.¹² Where appropriate, the Indigenous Peoples Development

⁶ Ibid, p. 25. The same paragraph further provides the following (at p. 25): "The strategies and approaches employed by ADB in relation to indigenous peoples build on the existing strategic framework and operational experience. The policy addressing indigenous peoples complements and supports, and is complemented and supported by other ADB policies. Compliance with the policy on indigenous peoples does not obviate the requirement of compliance with other ADB policies".

⁷ Ibid.

⁸ Ibid., p. 18. See further, (i) *Guidelines for Incorporation of Social Dimensions in Bank Operations*, Asian Development Bank, Manila, October, 1993; (ii) *Handbook for Incorporation of Social Dimensions in Projects*, Asian Development Bank, Manila, May, 1994.

⁹ Ibid, p. 18.

¹⁰ Ibid.

¹¹ Ibid, pp. 18, 19.

¹² Ibid., pp. 19, 20.

Plan is expected to redesign a project in order to decrease or mitigate negative impacts, or to provide adequate compensation, in addition to mitigating harm or damage.¹³ The policy recognizes that consultation with indigenous peoples' groups is "key to developing an effective, accurate, and responsive indigenous peoples development plan". Consequently, it appears to consider consultation with affected peoples as mandatory.¹⁴ The elaborate provisions on the Indigenous Peoples Development Plan include suggestions to consider the wishes of the affected indigenous peoples and their social and cultural patterns; capacity building of the concerned communities, organizations and institutions; and the use of specialists to help formulate such plans.¹⁵

Positive & Negative Features of the Policy and its Application

As is the case with various other instruments dealing with indigenous peoples' issues, the ADB policy on indigenous peoples contains positive features or strengths, as well as weaknesses and gaps that could be regarded as the policy's "negative" features.

Weaknesses & Negative Features

One of the most serious gaps or weaknesses in the policy is the general treatment of the policy at par with other policies of the bank, since the policy "applies in parallel with and does not replace or supercede other ADB policies and practices".¹⁶ Therefore, theoretically, if there is a contradiction between the bank's *Indigenous Peoples policy* and another ADB policy or practice, the former (the *Indigenous Peoples policy*) will not necessarily prevail, and this can work to the detriment of indigenous peoples.

This was the case, for example, with the ADB's forestry sector support to the Government of Bangladesh, in which the provisions of the bank's Forestry policy prevailed over its *Indigenous Peoples policy*.¹⁷

In addition, the bank's other relevant policies and practices must be considered "within the context of national development policies and approaches", since "the fundamental relationship between ADB and governments remains the basis for country-specific operations".¹⁸ In other words, despite provisions in the ADB's *Indigenous Peoples policy* respecting indigenous peoples' rights, needs and concerns, if national development policies and approaches of the borrower country run counter to these, the latter could well defeat, or water down, the impact of the positive aspects of the policy. In fact, this is quite a common occurrence across Asia.

For instance, indigenous peoples on the ground rejected a number of forestry sector legal reforms in Bangladesh because these denied the people's land and resource rights. The

¹³ Ibid., p. 19.

¹⁴ Ibid., p. 28 (Appendix).

¹⁵ Ibid.

¹⁶ Ibid., p. 25.

¹⁷ Philip Gain, *Background and Context to the Forest (Amendment) Act, 2000 and the (draft) Social Forestry Rules, 2000*, Society for Environment and Human Development (SEHD), Dhaka, Bangladesh, May, 2001, and Raja Devasish Roy & Philip Gain, "Indigenous Peoples and Forests in Bangladesh" in Minority Rights Group (ed.), *Forests and Indigenous Peoples of Asia*, Report 98/4, London, 1999, pp. 21-22.

¹⁸ Ibid.

reforms were facilitated by ADB technical assistance (“TA”) grants, which are provided in relation to past, ongoing and future loans. Many of the provisions of the national forestry policy of Bangladesh were in conflict with the positive aspects of the bank’s *Indigenous Peoples policy*.¹⁹ Similarly, another ADB-funded social forestry project in Bangladesh, which also affected indigenous peoples, was deemed to have paid little heed to the rights of women.²⁰

These examples from Bangladesh illustrate how the differing nature and level of protection provided by the ADB’s *Indigenous Peoples policy* and other policies and practices of the bank can lead to minimal protection of indigenous peoples’ rights. Such protection could even verge towards a *lowest common denominator* situation, rather than strongly and unequivocally upholding the rights of indigenous peoples.

In contrast, the *Indigenous Peoples* policies of some non-lending donor institutions, such as the Government of Denmark and the European Commission, provide a far higher status to the rights of indigenous peoples.²¹ Of course, one should bear in mind that the Danish government and the European Commission are non-profit institutions. The ADB, although an inter-governmental agency, is managed as a profit-making corporation. Its major decision-making processes are dominated by the strong corporate shareholdings of the different national governments in Asia and other continents.

Strengths & Positive Features

Despite the weaknesses and gaps of the ADB *Indigenous Peoples policy*, as mentioned above, a number of other provisions are respectful of the rights of indigenous peoples. These positive provisions have the potential to secure the rights and interests of indigenous peoples, at least in the limited circumstance where the bank and the loanee government are in agreement. The policy states the following:

“ .. initiatives should be compatible in substance and structure with the affected peoples’ culture and social and economic institutions, and commensurate with the needs, aspirations, and demands of affected peoples. Initiatives should be conceived, planned and implemented, to the maximum extent possible, with the informed consent of affected communities, and include respect for indigenous peoples’ dignity, human rights and cultural uniqueness”.²²

Another positive feature of the policy is the acknowledgment of the disadvantaged situation of indigenous peoples. It also refers to international instruments on indigenous peoples’ rights

¹⁹ Raja Devasish Roy and Sadeka Halim, “A Critique to the Forest (Amendment) Act of 2000 and (Draft) Social Forestry Rules of 2000”, published by Society for Environment and Human Development (SEHD), Dhaka, Bangladesh, May, 2001. Philip Gain, *Background and Context to the Forest (Amendment) Act, 2000 and the (draft) Social Forestry Rules, 2000*, Society for Environment and Human Development (SEHD), Dhaka, Bangladesh, May, 2001.

²⁰ Sadeka Halim, “Social Forestry in Bangladesh and the Role of Women” in *Discourse: A Journal of Policy Studies*, Vol. 3, Number 2, Winter, 1999, Institute for Development Policy Analysis and Advocacy, Proshika, Dhaka, pp. 58-79.

²¹ See, respectively, (i) *Danish Strategy for Indigenous Peoples* and (ii) Working Document of the [European] Commission of May, 1998.

²² Asian Development Bank, *Policy on Indigenous Peoples*, p., 17.

and recommends involving and strengthening indigenous peoples' institutions in the Indigenous Peoples Development Plan.²³

Difficulties, however, lie in the process of implementation. The ADB does not provide parallel mechanisms to ensure that the previously mentioned positive provisions are regarded as mandatory. A similar situation prevails in the case of the *World Bank Indigenous Peoples' policy*, which bears striking similarities with the ADB's. Recent reforms to the World Bank's *Indigenous Peoples policy* – the replacement of OD 4.20 by OP 4.10/BP 4.10 – include many desirable provisions that respect indigenous peoples' rights. However, these appear to be merely recommendatory, rather than mandatory.²⁴

Well-researched and objective findings on the positive impacts of ADB-funded development program on indigenous peoples are hard to find. The scarce literature that show ADB interventions in indigenous peoples' areas in a positive light appear to have been initiated or facilitated by the bank itself. In Bangladesh, for example, ADB-funded projects are generally regarded as harmful rather than beneficial to indigenous peoples.²⁵ Nevertheless, the possibility of positive and creative use of the policy to safeguard indigenous peoples' rights and interests should not be ruled out.

Case Study: A Potentially Positive ADB Project Intervention for Indigenous People; The Chittagong Hill Tracts Rural Development Project in Bangladesh

A *potentially* positive example of ADB intervention, with support from the indigenous people of the area concerned, is the *Chittagong Hill Tracts Rural Development Project* in Bangladesh.²⁶ The project was initiated with the consent of the Chittagong Hill Tracts Regional Council, the premier indigenous-majority semi-autonomous institution of the Chittagong Hill Tracts region. The project includes the indigenous chairperson of this council as the *ex-officio* chairperson of the project's *Regional Coordination Committee*, with three indigenous district council chairpersons and the three traditional paramount chiefs as members.²⁷ The project's primary focus is to reduce "absolute poverty" in the Chittagong Hill Tracts region and to provide a confidence-building environment to underpin the Chittagong Hill Tracts Peace Accord of 1997. The project also includes a *Community Development* component with programs on *Legal Literacy, Training and Gender*.²⁸ The loan agreement between the bank and

²³ Ibid., pp. 13-15.

²⁴ See, for example, statement of representative of Indigenous Peoples' Organizations participating at the Round Table meeting on the World Bank's Indigenous Peoples' Policy in *Washington, DC, USA on 17 October, 2002*.

²⁵ See, e.g., (i) Philip Gain, *The Last Forests of Bangladesh*, Society for Environment and Human Development, Dhaka, February, 1998 (esp. pp. 151-174) and (ii) Suhas Chakma, "ADB Programs in Bangladesh: Identifying the Critical Issues", in *Indigenous Perspectives: A Journal of the Tebtebba Foundation, Vol. III, Number 1*, Baguio City, Philippines, 2000, pp. 140-150.

²⁶ This project was initiated through ADB Loan No. 1771-BAN (SF). The project commenced in May, 2004 and is scheduled for completion in March, 2008. See, e.g., *Project Proforma of the Ministry of Chittagong Hill Tracts Affairs, Government of Bangladesh, March, 2004* and SMEC International Pty Ltd, *Chittagong Hill Tracts Rural Development Project: Second Consultant Report to the CHT Regional Coordination Committee*, 13 July, 2005.

²⁷ *Project Proforma of the Ministry of Chittagong Hill Tracts Affairs, Government of Bangladesh, March, 2004*, p. 67 (Annexe 20).

²⁸ SMEC International Pty Ltd, *Chittagong Hill Tracts Rural Development Project: Second Consultant Report to the CHT Regional Coordination Committee*, 13 July, 2005, pp. 7-14.

the Government of Bangladesh refers to the monitoring and implementation of an *Indigenous Peoples Development Plan* by the project-monitoring unit.²⁹

The involvement of representative institutions of indigenous peoples in decision-making and project implementation is no doubt a desirable development, if that has happened with the prior, informed consent of the peoples concerned. However, the potentially positive impact of the project is at risk of being diluted, or even undone, by certain features of the project that have been included without the knowledge and consent of the peoples concerned. In particular, the inclusion into the project of micro-credit disbursement by local NGOs was apparently done at the behest of the bank's president rather than by the wishes of the indigenous peoples of the region.³⁰ At a recent meeting of the *Regional Coordination Committee*, serious concerns were raised by the chairperson and other indigenous members regarding the proposed loan disbursement, which is in violation of regional laws, practices and interests of local indigenous people.³¹

Monitoring, Evaluation and Policy Review: Weaknesses and Opportunities

An important factor in ensuring the implementation of the positive features of the ADB *Indigenous Peoples policy* is effective monitoring. This, in turn, is dependent on the bank's *internal* mechanisms and processes of monitoring and evaluation, as well as on the external processes of monitoring and evaluation by indigenous peoples, governments, NGOs.

With regards internal monitoring, the bank's most important agencies are the *Office of Environment and Social Development (OESD)*, the *Programmes Department* (in relation to country programming), the resident missions in the countries, and the *Operations Evaluation Office*, the last-named being involved predominantly in "post-evaluation" functions.³² However, it appears that these agencies do not have much influence on the bank's operations in indigenous people-inhabited areas, except in limited circumstances such as the project in the Chittagong Hill Tracts region in Bangladesh.

In the case of the *Office of Environment and Social Development*, individual employees may have the required attitude and respect for indigenous peoples' rights, aspirations and perspectives. However, their views seem to run counter to those of other weightier departments and agencies within the bank. The situation is best illustrated by a comment made informally by a World Bank employee. He lamented, "What can we, a dozen or so sociologists and anthropologists, do in the wake of contrary views of our more influential

²⁹ Agreement on Loan No. 1771 BAN (SF) on the *Chittagong Hill Tracts Rural Development Project* between the People's Republic of Bangladesh and the Asian Development Bank, dated, 18 December, 2000 (esp. Schedule 6, paragraph 30).

³⁰ *Report and Recommendation of the President to the Board of Directors on a Proposed Loan to the People's Republic of Bangladesh for the Chittagong Hill Tracts Rural Development Project (RRP: BAN 32467)*, Asian Development Bank, October, 2000, p. 16 (paragraphs 46, 47).

³¹ 5th meeting of Regional Coordination Committee of the Chittagong Hill Tracts Rural Development Project, held in Rangamati, Chittagong Hill Tracts, Bangladesh on 4 July, 2005, attended by the writer (in his capacity as a member of the committee by virtue of being one of the chiefs of the region). The local NGO, Taungya, withdrew its application to be included among the local NGOs to help implement the project when it realized that it would have to also engage in a micro credit operation by investing its own funds (in addition to subsidies from the government); interview with Amlan Chakma, Executive Director, Taungya, Rangamati, Bangladesh, 25 October, 2005.

³² Asian Development Bank, *Policy on Indigenous Peoples*, p., 24.

economist colleagues, whose numbers run into the hundreds, and whose primary concerns have little to do with the welfare of indigenous peoples or other such groups..."³³

In any future revision of ADB's *Indigenous Peoples' policy*, the findings of the ADB *Operations Evaluation Office*, if obtained in an accurate and objective manner, would be of great assistance. In the case of the World Bank, the bank ignored or missed a similar opportunity to disseminate and utilize the findings of its corresponding agency, the Operations Evaluation Department, during appropriate stages of its *Indigenous Peoples' Policy* revision process.³⁴ Therefore, a crucial factor in determining proper implementation, monitoring and evaluation, and consequent revision, is the question of how participatory the bank's approach is in involving indigenous peoples in the relevant processes.

Opportunities can always be created to open the necessary space for indigenous perspectives, if the bank's high-level decision-makers can muster the will to do so. The ADB has formally consulted indigenous peoples and other "stakeholders" in the process of policy-formulation,³⁵ and policy-review in certain cases.³⁶ However, these processes are generally inadequate in terms of time and opportunity given to indigenous peoples and other *stakeholders* to provide their inputs.³⁷ Only a few of these processes were sufficiently inclusive or transparent.³⁸ Unless such trends are corrected, indigenous peoples will remain substantively deprived of their rights in ADB-financed projects and interventions in their areas.

The example of the World Bank's consultation process for its recently reformed *Indigenous Peoples* policy was one of inadequate consultation and sensitivity.³⁹ The experience suggests that indigenous peoples need to strengthen their lobbying efforts, if they are to influence reforms in policy and practice of multilateral development banks in the right direction. It would do well to remember that, ultimately, institutions such as the Asian Development Bank and the World Bank are primarily oriented towards profit. Their perspective of economic growth through a "poverty reduction" is insufficiently receptive of indigenous perspectives on rights and development.

³³ This comment was made in the presence of this writer, some years ago in an international meeting related to indigenous peoples' rights by a World Bank official, whose identity it would not be rights to divulge without his consent.

³⁴ *Statement of Indigenous Participants at the Consultation on the World Bank's Draft Policy on Indigenous Peoples* (OP/BP 4.10), Dhaka, Bangladesh, 14 November, 2001, attended by this writer.

³⁵ For example, the ADB held one formal consultation with indigenous peoples' representatives regarding its (then draft) *Indigenous Peoples* policy in Punta Baluarte, Philippines in 1995 (which was also attended by this writer).

³⁶ For example, the *Regional Workshop on Review of the Asian Development Bank's Forestry Policy* held in Manila, Philippines, on 14-15 February, 2002 (attended by this writer).

³⁷ For example, in the case of the draft *Indigenous Peoples' policy* meeting held in Punta Baluarte, Philippines, 1995.

³⁸ For example, in the *Forestry policy* held in Manila on 14-15 February, 2002, this writer was perhaps among only one or two participants who criticized the draft policy, with the overwhelming majority of participants remaining either silent or making non-critical remarks about the draft. This writer concluded, therefore, that this was substantively an orchestrated meeting that consciously excluded critical voices. This is also the opinion of Chris Lang in "ADB's Draft Forest Policy: The Politics of Participation", published in *WRM Bulletin* 74, September, 2003.

³⁹ See, for example, the statement of representative of Indigenous Peoples' Organizations participating at the Round Table meeting on the World Bank's *Indigenous Peoples' Policy* held in *Washington, DC, USA* on 17 October, 2002 (attended by this writer).

Despite such limitations, indigenous peoples can strengthen their networking and organizational skills and help steer policy reforms in their hoped-for direction through advocacy, lobbying and policy dialogue. With this as a backdrop, a number of observations are made below, which can facilitate indigenous peoples' efforts to change the relevant policies and practices of the ADB. This change is necessary in order to bring the policies and practice of the ADB in conformity with existing and emerging international standards on the rights of indigenous peoples.

Conclusion: Ways Forward

- *Reform the Existing Policy*

There is much room to improve upon the contents of the policy itself. The current policy accounts for the rights of indigenous peoples, without an unequivocal commitment to honor and respect these rights. More importantly, the policy does not provide adequate mechanisms to respect and adhere to such rights. The basic rights of indigenous peoples, including their right to self-determination, their rights over their lands and territories, and their right to prior and informed consent⁴⁰ concerning development interventions in their areas are now part of customary international law. These need to be unequivocally acknowledged as part of mandatory guidelines in any policy revision.

- *Process of Review and Reform*

Although the ADB did consult a limited number of indigenous peoples' representatives prior to the adoption of its current *Indigenous Peoples* policy, such consultations were regarded by indigenous peoples as inadequate.⁴¹ The process of reforming the bank's Forestry policy, for example, was seriously flawed by being insufficiently open, transparent or inclusive.⁴² Similarly to be avoided is the manner in which the World Bank held formal consultations with indigenous peoples' representatives, including legal experts, between 2002-2005.⁴³ The modalities for a future review process of the ADB *Indigenous Peoples* policy need to be agreed upon, together with indigenous peoples. Such consultations need to be preceded by an in-depth evaluation of the diverse impacts of ADB-funded projects on indigenous peoples.

- *Monitoring and Evaluation of Project Impact upon Indigenous Peoples*

⁴⁰ In its new policy on indigenous peoples (OP 4.10), the World Bank mentioned the requirement of Prior Informed *Consultation*, which has been rejected by indigenous peoples since it falls short of the principle of Prior Informed *Consent*.

⁴¹ This writer was among the participants at a formal consultation on the policy held at Punta Baluarte, Philippines, in 1995. Many of the participants at the meeting felt that the process of consultations was not participatory enough and therefore advised the Bank's representatives to hold further formal consultations with indigenous peoples' representatives, which advice does not seem to have been accepted or acted upon by the bank.

⁴² See for example, Chris Lang in "ADB's Draft Forest Policy: The Politics of Participation", published in WRM Bulletin 74, September, 2003.

⁴³ See, e.g., the letter written by representatives of indigenous peoples to the Vice Chairman of the World Bank, on 24 March, 2004 expressing concern over the process of consultations.

The experience of the European Commission (EC) in having some of its projects evaluated by indigenous experts, and the findings shared among indigenous peoples and EC project staff and policy-level officials, can provide ideas for similar evaluation exercises of ADB-funded projects. Indigenous peoples have demanded that the World Bank involve local, national and regional indigenous organizations in actively tracking and monitoring its operations throughout the whole project cycle.⁴⁴ Such needs are equally relevant in the case of the ADB.

- *Influencing Policy Reforms by ADB-Member Country Governments*

Since the ADB's *Indigenous Peoples* policy is affected by the relevant policies of the borrower governments, the positive impact of the bank's policy would be watered down or countered in the absence of adequate acknowledgement of indigenous peoples' rights in national laws and policies. Some have advocated that the ADB engage the concerned national governments to initiate policy reforms in their countries and to effectively implement the bank's *Policy on Indigenous Peoples*.⁴⁵ It is important in this respect to encourage ADB member governments to not only consult indigenous peoples, but to institutionalize appropriate methods of consultation.⁴⁶

- *Information and Data*

Dissemination of data and information (in appropriate form) is crucial to ensuring that the necessary implementation and reform process is in accordance with the rights of indigenous peoples. This can also promote transparency and accountability.⁴⁷

- *Including Indigenous Peoples in Bank-Member Country Negotiations*

The ADB policy clearly declares that "the fundamental relationship between the ADB and governments remains the basis for country-specific operations".⁴⁸ Indigenous peoples are, however, often unaware of the contractual relationship between the bank and borrower governments. This problem needs to be corrected through indigenous participation, both in the deliberations of the bank and in policy dialogues with the concerned government.⁴⁹

⁴⁴ Statement of representative of Indigenous Peoples' Organizations participating at a *Round Table* meeting on the World Bank's Indigenous Peoples' Policy held in Washington, DC, USA on 17 October, 2002.

⁴⁵ Suhas Chakma, "ADB Programs in Bangladesh: Identifying the Critical Issues", in *Indigenous Perspectives: A Journal of the Tebtebba Foundation, Vol. III, Number 1*, Baguio City, Philippines, 2000, pp. 140-173, at p. 149.

⁴⁶ Raja Devasish Roy, "Perspectives of Indigenous Peoples on the Review of the Asian Development Bank's Forest Policy", paper presented at the *Regional Workshop on Review of the Asian Development Bank's Forestry Policy* held in Manila, Philippines, on 14-15 February, 2002.

⁴⁷ *Ibid.* See also, Suhas Chakma, *op. cit.*, p. 148.

⁴⁸ Asian Development Bank, *Policy on Indigenous Peoples*, p. 25.

⁴⁹ Statement of representative of Indigenous Peoples' Organizations participating at a *Round Table* meeting on the World Bank's Indigenous Peoples' Policy held in Washington, DC, USA on 17 October, 2002.

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