

NO	Comment	Response
1	If JBIC requires borrowers to meet the world bank safeguard policy, both JBIC and borrower understanding regarding WB policy needs to be strengthened. It is suggested that JBIC environmental and social policy is used, to avoid the difference interpretation regarding WB policy .	We endeavor to ensure smooth operations concerning application of the World Bank Safeguard Policy. Besides, needless to say, in the cases that differences arise in interpretation, it is ultimately required to be solved through coordination between the borrower and JBIC, but we have no intention to reflect it to the provisions.
2	What is meant by "environmental permit certificate"? In Indonesia, the environmental permit for the project is obtained as EIA endorsed by the appropriate authority.	This indicates environmental permission for the applicable project by the authorities. We think that the forms of permission would be varied depending on the legal systems in place in different countries. For example, Indonesia's "EIA endorsed by the appropriate authority" is also applicable to the permission.
3	What is the difference between basic resettlement plans and resettlement plans?	Since the World Bank's OPs are used as reference points or benchmarks in the current JBIC Guidelines for confirmation of Environmental and Social considerations (hereinafter referred as to "Guidelines"), there is basically no difference between the two. The World Bank Safeguard Policy OP4.12 Annex A is clearly stated in the clause regarding Involuntary Resettlement of the draft of the revised Guidelines, because an inclusion of the details stipulated therein is deemed desirable. As a result, it has been more clarified in the draft of the revised Guidelines compared with the current Guidelines.
4	Indigenous peoples are identified and	In principle, it is thought that it is desirable

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	<p>measured on resettlement plans, so there is no need to submit Indigenous peoples plans.</p>	<p>to make resettlement plans separately from indigenous peoples plans, in order to take special considerations for indigenous peoples into account. However, we flexibly handle this matter after due consideration of the systems and cultural characteristics of the area in question. Besides, effects on indigenous peoples can occur without involuntary resettlement, and in those cases we understand that indigenous peoples plans are to be made individually.</p>
5	<p>It is suggested that the term of "critical natural habitat" and "critical forest" are specified as "protected natural habitat" and "protected forest"</p>	<p>We recognized strong needs against clarification of the provision relating to conservations of area which is important for ecosystems, biodiversity and so on in the discussion of the public consultation meetins held in Japan. As a result, the item on "Ecosystem and Biota" was added based on the World Bank Safeguard policy. Therefore, we think that it had better to fit the wordings in the World Bank Safeguard Policy with the wordings in the Guidelines as much as possible, in order to avoid any confusion over interpretation. Under the recognition, the terms "critical natural habitat" and "critical forest" were specified.</p>
6	<p>As our experiences, there is no such certification by forest certification system for the project involving commercial harvest.</p>	<p>The forest certification system is the system that independent third party agencies evaluate and certify wooden products in light of certain criteria. And it is said that it contributes to protect forests by putting a certification label on the products from forests which are appropriately managed.</p>

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		<p>The main ones in forest certification are the FSC (Forest Stewardship Council) and PEFC (Programme for the Endorsement of Forest Certification schemes). In the draft of the revised Guidelines, we are encouraging the use of forests in possession of the certification label in the project of forestry sector, as a means of avoiding illegal deforestation.</p>
7	<p>The JBIC guideline is already enough to cover the resettlement issue.</p>	<p>In the current Guidelines there are provisions regarding involuntary resettlement, and confirmations are carried out in actual environmental reviews, while using the World Bank Safeguard Policy etc as reference points or benchmarks . However, since involuntary resettlement is an extremely serious issue, the necessity is recognized of more clear stipulation in the guidelines through discussion in consultation meetings. In the draft of the revised Guidelines, the contents of the applicable articles are being expanded based on the details of the World Bank Safeguard Policy.</p>