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Examination Report on Objection to Cirebon Coal-fired Power Plant Project – Unit 1, West Java, Indonesia

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Section 1. Purpose of this Report

JBIC's Examiners for Environmental Guidelines (hereinafter "the Examiners") issue this report on the basis of Paragraph 1, V. 5 of the "Summary of Procedures to Submit Objections concerning JBIC Guidelines for Confirmation of Environmental and Social Considerations" (hereinafter "the Summary"), which JBIC introduced in accordance with Japan Bank for International Cooperation Guidelines for Confirmation of Environmental and Social Considerations (April 2002). This report describes the results of the investigation on whether the environmental and social considerations over the Cirebon Coal-fired Power Plant Project Unit 1, West Java, Indonesia, were made in accordance with Japan Bank for International Cooperation Guidelines for Confirmation of Environmental and Social Considerations (April 2002). This report describes the results of the investigation on whether the environmental and social considerations over the Cirebon Coal-fired Power Plant Project Unit 1, West Java, Indonesia, were made in accordance with Japan Bank for International Cooperation Guidelines for Confirmation of Environmental and Social Considerations (hereinafter "JBIC Environmental Guidelines"), along with the progress of a dialogue between parties concerned.

Because the project is in a state where loans are completed and the operation of the power plant related to this project has also commenced, this objection concerns the compliance or non-compliance with the monitoring provisions of JBIC Environmental Guidelines. Therefore, the Examiners focused their investigation on whether JBIC's monitoring on the project has been conducted in line with JBIC Environmental Guidelines.

Section 2. Project Overview

The Cirebon Coal-fired Power Plant Project Unit 1, West Java (hereinafter "the Project"), involved co-financing by JBIC and private financial institutions to PT. Cirebon Electric Power, the proponent of the Project (invested in by Marubeni Corporation (32.5%), Korea Midland Power (27.5%), Samtan (20%), and Indika Energy (20%)) (hereinafter "the Project Proponent") for the construction and operation of a coal-fired power plant of 660MW capacity in Cirebon in West Java, Indonesia. The power plant commenced operation in July 2012.

Furthermore, JBIC is currently reviewing loans, as an internal consultation, for the Cirebon Coal-fired Power Plant Unit 2, which is positioned as an expansion project. However, it is to be noted that this report does not cover investigations for such Unit 2.

Section 3. Background and Outline of Objection

(1) Background of Objection

On November 10, 2016, local residents among others visited JBIC's Representative Office in Jakarta and submitted a letter of objection addressed to the Examiners concerning the Project (dated as November 8, 2016). Given that the loans for the Project have already been completed, the objection points out JBIC's non-compliance with the monitoring provisions of JBIC Environmental Guidelines on the basis of the Summary.

As a result of doubts about the content of the objection, the Examiners sent a letter stating their questions to the Requesters on December 15 of the same year. On January 26, 2017, the Examiners received a response from the Requesters to the questions. After examining the content of the response, the Examiners decided to proceed with the objection against the Project on January 31, 2017.

Following the decision to begin the procedures, the Examiners conducted investigations, including individual interviews with each party concerned, at the project site from March 8 to 9, 2017.

(2) Outline of Objection

The outline of the objection is as follows:

- (i) Name of country: Republic of Indonesia
- (ii) Project site: Cirebon, West Java
- (iii) Name of project: The Cirebon Coal-fired Power Plant Project Unit 1 in West Java (660 MW capacity; commencement of operation: July 2012; project cost: approx. USD850 million; Project Proponent: PT. Cirebon Electric Power (invested in by Marubeni Corporation (32.5%), Korea Midland Power (27.5%), Samtan (20%), and Indika Energy (20%)); signing date of the 30-year power purchase agreement with Perusahaan Listrik Negara: August 2007; signing date of loan agreement with JBIC and private financial institutions amounting approx. USD595 million: March 2010).
- (iv) Reported damage: broadly divided into two, which are (1) loss of livelihood and income opportunities ((i) destruction of biodiversity and damages on small-scale fishermen and shellfish harvesters; (ii) damages on salt-makers; (iii) damages on farmers) and (2) aggravating air pollution and damages on health.
- (v) Reported non-compliance to JBIC Environmental Guidelines: allegations by the Requesters can be broadly divided into six points, as follows:

(A) Part 1, 4 (4) Monitoring, Paragraph 2, 4, and 5, of JBIC Environmental Guidelines

"Even after NGOs pointed out and we, the community, also sent a letter to point out the problems related to the Unit 1 project, such as the negative impacts on our livelihoods, the air pollution, and the significant flaws in the process of Environmental Impact Assessment (EIA) and land acquisition, JBIC has just denied the facts we claimed, only relying on the information supplied by the project proponents. JBIC has ever failed to make sufficient effort to conduct its own investigations to appropriately confirm the facts we claimed, despite of our serious concerns and experiences. In fact, JBIC has never contacted us. As a result, JBIC has also ever failed to judge that there is a need for improvement in the local situation, and thus has ever failed to ask the project proponent to take appropriate action, or to consider taking its own actions in accordance with the loan agreement."

(B) Part 1, 4 (4) Monitoring, Paragraph 3

"We (The Requesters) have never known or realized that the project proponents carried out the investigation of the specific claims, including ours, the examination of countermeasures, and their incorporation into the project plans through transparent and accountable processes. The project proponents have never shown the community the clear evidence or proof that the Unit 1 project has not been causing any damages we are claiming. And JBIC has failed to confirm the fact that the project proponents had never taken such actions through transparent and accountable processes."

(C) Part 2, 1. (Compliance with Laws, Standards and Plans)

"In the Unit 1 Project, the emission concentration of NOx (829 mg/Nm³) is beyond the current standards of 2008 in Indonesia (750 mg/Nm³). Though the emission concentration used to comply with the old standards of 1995 (850 mg/Nm³), the project proponent and JBIC must consider the appropriate action on this important factor, as the community is greatly concerned about our health, especially our children's."

(D) Part 2, 1. (Involuntary Resettlement)

"There was no sufficient compensation or support for small-scale fishermen, shellfish harvesters, *lerasi* makers, salt-makers, and

farmers affected by the Unit 1 project. Only 2 boats provided among many small-scale fishermen were not sufficient. Some fishnets provided for fishermen were not the fundamental or effective solution because the amount of fish and *rebon* remains less than before the Unit 1 project. No remedy was considered at all for the loss of shellfish picking. No compensation and no effective support were provided by the project proponent for the affected tenant salt-makers. Due to the lack of sufficient compensation or support, our standard of living and income opportunities have not been restored yet."

(E) Part 2, 1. (Monitoring) Paragraph 1

"Even through our livelihood or income opportunities haven't been restored yet as described in the above section, the project proponent has failed to take appropriate measures, so far. One of the reasons for this failure is because the project proponent has failed to closely monitor the implementation situation and the effectiveness of the mitigation measures. Likewise, the project proponent has failed to appropriately monitor whether the air pollution control has been effective or not. In fact, the fly ash and coal dust has been found surrounding the Unit 1 project site."

(F) Part 2, 1. (Monitoring) Paragraph 4

"In the monitoring stage of the Unit 1 project, or even after we sent a letter to JBIC, we have never known or realized such forum for discussion and examination of countermeasures be established based on sufficient information disclosure and the participation of stakeholders."

<u>Section 4. Results of Preliminary Investigation (see Attachment for results under review)</u>

Attachment shows the results of the preliminary investigation specified in V.2 of the Summary. Following the results of the preliminary investigation, the Examiners made a decision to begin the objection procedures, but dismissed the objection concerning two items of the reasons for the objection (1 Compliance with Laws, Standards and Plans; and 2 Involuntary Resettlement) as they are not subject to the monitoring provisions of JBIC Environmental Guidelines, proceeding to conduct the investigation for four other items only.

As a result of the preliminary investigation, the above fact, 1 (Compliance

with Laws, Standards and Plans), was not acknowledged to have violated the NOx standards. The value of 829mg/Nm³, which has been claimed by the Requesters, is thought to have been converted from 754mg/Nm³ at the time of preparing the environmental impact assessment into the Indonesian measurement conditions (oxygen concentration of 3%, 25°C, and 1atm), but because the standard corresponding to the value is 850mg/Nm³, the power plant was designed to meet the standards at the time of environmental license approval. Additionally, given that it has been reported that NOx was measured to be 182.5mg/Nm³ (mean value for FY20161H) after the commencement of the project, it can be acknowledged that this value is below the current Indonesian standards (750mg/Nm³), as well as the EHS Guidelines of the World Bank Group (510mg/Nm³).

Section 5. Results of Fact-finding Investigation and Dialogue Promotion

- (1) Record of Interviews with JBIC's Operational Departments for Investigating Compliance with JBIC Environmental Guidelines
 - (i) Date of interview: November 25, 2016, and February 16, 2017
 - (ii) Detail of interviews: summarizing of assertions by the Requesters and JBIC on the causal relationship between non-compliance matters with JBIC Environmental Guidelines and the damages, and confirmation of the content of monitoring conducted by JBIC for the Project and the provisions of the Summary.

Additionally, during the above interviews, the Examiners confirmed the update of on-site inspections and interviews with NGOs by JBIC's Operational Departments, shown as below:

Date		On-site	Detail
		inspection/interview	
June 18	8-20,	Cirebon 1 on-site	Interviews with Project Proponent, West
2008		inspection	Java Environmental Management
			Agency, on-site inspection of project site
			(during ground leveling work), etc.
October	14,	Cirebon 1 on-site	Interviews with Project Proponent,
2009		inspection	residents, on-site inspection of project
			site (during construction), etc.
November	19,	Cirebon 1 on-site	Interview with Project Proponent, on-site
2014		inspection	inspection of Cirebon 1 operation, etc.

November 12,	Interview with NGO	Q&A session with FOE Japan (agent for
2015		objectors to Cirebon 1 project) and other
		Japanese NGOs
May 11-13,	Cirebon 1 & 2 on-site	Interviews with Project Proponent, West
2016	inspection	Java Environmental Management
		Agency, visit to surrounding communities,
		on-site inspection of Cirebon 1 operation
		and scheduled site for Cirebon 2 project
May 23, 2016	Interview with NGO	Q&A session with FOE Japan (agent for
		objectors to Cirebon 1 project) and FOE
		Indonesia
September 30,	Interview with NGO	Q&A session with FOE Japan (agent for
2016		objectors to Cirebon 1 project) and other
		Japanese NGOs
October 17-19,	Cirebon 1 & 2 on-site	Interview with Project Proponent, on-site
2016	inspection	inspections of Cirebon 1 and 2 project
		sites, visit to CSR activity sites, etc.

Note (i): "Cirebon 1" refers to the Cirebon Coal-fired Power Plant Unit 1; and "Cirebon 2" refers to Unit 2 of the same power plant.

Note (ii): Locations of the "on-site inspection" is Cirebon, the "interview with West Java Environmental Management Agency" in Bandung (capital city), West Java Province, and the "interview with NGO" in Tokyo.

(2) Investigation Results of Compliance with JBIC Environmental Guidelines

(i) Description of damages incurred:

The Requesters state their case as follows: "Since the company started the construction of the Unit 1 plant in 2007, households who had been living on shellfish picking in Desa Kanci Kulon have been totally gone and residents with other livelihoods have also been affected. We have experienced the sharp drop of fish, shrimp and *rebon* at the coastal area in Desa Kanci Kulon since the construction of the Unit 1 project, including a jetty, water intake and outlet facilities. Though spending long time to find fish, shrimp and *rebon*, we couldn't find much and were just exhausted after the construction of the Unit 1 plant. Thus, some of the small-scale fishermen have already quit fishing due to less catches. Likewise, many shellfish could not be found any more at the coastal area in Desa Kanci Kulon after the project. We were forced to give up or stop our shellfish picking. Some

salt-makers lost their salt pans or livelihood without any compensation or effective remedy from the Project Proponent."

According to the Annex of the objection letter (eight changes in living conditions before and after the project), the decline in catch of fish and harvest in farms is indeed indicated. Also, on page 4 of the Requesters' letter responding to Examiners' questions, it is indicated that the amount of fish catches of small-scale fishermen has significantly decreased. Although these data do not necessarily indicate long-term trend, it cannot be denied that some influence may have been brought to bear on the surrounding coastline and living environment of the Requesters after the Project's commencement. However, the specific details of the damages have not been proven based on the evidence obtained from the investigations currently conducted, even with the assertions and response from the Requesters. Moreover, the causal relationship of whether the damages on the Requesters were in fact caused by the Project has not been clarified by the current investigations.

- (ii) Compliance with JBIC Environmental Guidelines (monitoring provisions)
 - (A) Part 1, 4 (4) Monitoring, Paragraph 2, 4, and 5, of JBIC Environmental Guidelines

JBIC, as the one responsible for requesting monitoring results from the Project Proponent, as well as opinions from stakeholders, including affected residents, as needed, has made additional confirmation with the Project Proponent and conducted local investigation concerning the opinions and claims informed by NGO, the Requesters' agent. Upon the local investigations, JBIC had meetings with West Java Environmental Management Agency and confirmed with them the Project's adequacy in terms of the environmental and social considerations at the monitoring stage of the Project.

Therefore, violation of the monitoring provisions has not been acknowledged.

(B) Part 1, 4. (4) Monitoring, Paragraph 3

After prompting the Project Proponent to respond appropriately, JBIC has confirmed the following facts: the Project Proponent has been conducting monitoring of air and water pollution management, flooding at heavy rainfall, and implementation of social considerations, and submitted the results to West Java

Environmental Management Agency; the Project Proponent has responded to claims from affected residents (including request and opinions), conducted investigations of impact on livelihood of fishermen, salt-makers, and farmers and health conditions of residents, in cooperation with third party organizations, such as Cirebon Prefecture and a university, and appropriately updated the affected residents with the investigation results; the Project Proponent has been running activities that prompt the affected residents to participate in measures to recover livelihoods by introduction to CSR programs, such as work training and self-supporting programs. JBIC has confirmed through interviews with West Java Province's environmental authorities that the Project Proponent has periodically reported the implementation and details of dialogues with the affected residents for such social considerations, and that the authorities have evaluated the reported content to be appropriate.

From the above, it can be acknowledged that JBIC has confirmed that specific careful inspections of claimed items, consideration of countermeasures, and their appropriate incorporation to the project plan have been done through transparent and accountable processes. Therefore, violation of the monitoring provisions has not been acknowledged.

(C) Part 2, 1. (Monitoring) Paragraph 1

First of all, the occurrence of unpredictable situations has not been confirmed after the project commencement. As a result of the investigations, JBIC confirms the following facts: the Project Proponent has provided compensation for the recovery of livelihoods through dialogues with affected residents who need to be considered as fishermen, salt-makers, and farmers, among others, from the environmental impact assessment stage of the Project; other than providing monetary compensation, the Project Proponent has provided self-support, such as vocational training, and established and repaired infrastructures, including water supply facilities; the Project Proponent has presented the monitoring results and measures for recovering livelihoods through regular dialogues with the community of affected residents. Regarding the social consideration activities including the livelihood recovery measures, the Project Proponent publishes an annual report and posts the report on their website.

JBIC has also confirmed that the Project Proponent conducts monitoring of air pollutants (NOx, SOx, PM, etc.), and that the results sufficiently satisfy the current standards and are sufficiently lower than the EHS Guidelines of the World Bank Group. JBIC has confirmed that the Project Proponent conducts regular health checkups for the affected residents, and that they have not found effects on the examined residents caused by the gas emissions and other pollutants from the Project.

From the above, it can be acknowledged that JBIC is fully aware of the implementation and effectiveness of planned mitigation measures, and has confirmed that the Project Proponent has conducted appropriate measures. Therefore, violation of the monitoring provisions has not been acknowledged.

(D) Part 2, 1. (Monitoring) Paragraph 4

JBIC, in addition to confirming the facts mentioned above in (B), has also confirmed the following facts: the Project Proponent presents the various monitoring results regarding the Project's impact on the air and water environment, as well as various ways to manage the impact to the affected residents through regular dialogues; and that the Project Proponent has offered self-support, such as vocational training, and established and repaired infrastructures, such as water supply facilities, and tried to have communications through dialogues and discussions on requests and opinions from the affected residents.

From the above, it can be acknowledged that JBIC has confirmed that opportunities for discussing and examining countermeasures have been provided for stakeholders involved in the Project based on adequate information disclosure, and procedures for solving issues have been taken. Therefore, violation of the monitoring provisions regarding this point has not been acknowledged.

(E) Summary

As shown above, it has been acknowledged that JBIC conducts the monitoring in line with JBIC Environmental Guidelines, while non-compliance with the monitoring provisions has not been acknowledged. Based on JBIC Environmental Guidelines, JBIC in principle confirms the results of monitoring through the Project Proponent, who is the borrower, and JBIC has been appropriately confirming the results. Although there have been indications from third parties, JBIC has confirmed the situation every time, while informing such indications to the Project Proponent, the borrower, and encouraged them to continue the discussions and dialogues with residents.

(iii) Causal Relationship between Compliance with JBIC Environmental Guidelines and Damages

Since the non-compliance with JBIC Environmental Guidelines has not been acknowledged, the causal relationship between compliance with JBIC Environmental Guidelines and damages will not be an issue.

(iv) Final Results

As provided above, JBIC's non-compliance with JBIC Environmental Guidelines has not been acknowledged following the results of the investigation.

Despite unclear causal relationship between the Project and the damages on the Requesters under current information obtained by the investigation, the Examiners believe that appropriate considerations should continue to be made to ensure sound living environment for the Requesters. The Examiners expect the monitoring and promotion of discussions and dialogues between parties concerned to be conducted continuously to ensure such living environment of the Requesters.

Section 6. Status of Agreement on Dialogue Promotion and Record of Dialogue Between Parties Concerned

- (1) Dialogue between WALHI and Marubeni Corporation
 - Date of dialogue: May 18, 2016
 - A dialogue was conducted between Wahana Lingkungan Hidup Indonesia ("WALHI"), an NGO acting as the agent of the Requesters, and Marubeni Corporation, which invests in the Project Proponent.
 - Content of agreement in case the agreement is reached between parties concerned: disagreed

- (2) Interview Conducted by Examiners with Requesters
 - Although the Requesters conducted a dialogue(s) with the Project Proponent through their agent, WALHI, they themselves have not had any dialogue directly with the Project Proponent. The Examiners suggested promoting dialogues between the parties concerned, but since the Requesters requested that the Examiners prioritize the local investigation, the Examiners did not intermediate between them and instead conducted individual interviews with each party as shown below.
- (A) Individual interview with Project Proponent
 - Date of interview: March 8, 2017
 - · Place of interview: West Java Province, Indonesia
 - Detail of interview: The Project Proponent described to the Examiners their environmental conservation and CSR activities. The Examiners conducted field confirmation of the plants inside the power plant facility area, nearby coasts, and other areas, and inspection of CSR activity sites. The Examiners then encouraged the Project Proponent to have direct dialogues with the Requesters.
- (B) Individual interview with Requesters
 - Date of interview: March 9, 2017
 - Place of interview: West Java Province, Indonesia
 - Detail of interview: After having heard directly from the Requesters descriptions of the damages claimed in the objection letter, the Examiners introduced them to the CSR activities the Project Proponent provides and suggested them to consider having direct dialogues with the Project Proponent. Following the interview, the Examiners, as requested by the Requesters, inspected the former salt pans which had been owned by surrounding residents who are engaged in farming nearby the Project's power plant facility area. The Examiners then encouraged the Requesters again to have direct dialogues with the Project Proponent.

Section 7. List of Materials that served as Basis for Judgment of Examiners

- Objection Regarding the Cirebon Coal-fired Power Plant Project in West Java, Indonesia, dated November 8, 2016
- ANNEX of "Objection Regarding the Cirebon Coal-fired Power Plant Project in West Java, Indonesia", dated November 8, 2016
- Report on Local Investigation of the Cirebon Coal-fired Power Plant Project (May 20, 2016)

- SEMI-ANNUAL ENVIRONMENTAL MONITORING REPORT-FOR PERIOD FROM 1 DECEMBER 2015 TO 31 MAY 2016
- SEMI-ANNUAL ENVIRONMENTAL MONITORING REPORT FOR PERIOD FROM 1 DECEMBER 2012 TO 31 MAY 2013
- Cirebon Electric Power, Living and Livelihood / Flood Countermeasure (period: December 1, 2015 – May 31, 2016)
- Urgent Request from Indonesia Civil Societies to Japanese Government /Companies to stop financial coal projects in Indonesia dated November 12, 2015.
- REPORT TO RESPOND ON RAPEL (NGO) CONCERNS FOR THE OPERATION OF CIREBON POWER PLANT UNIT 1 AND UNIT 2
- LABORATORIUM KIMIA ANALITIK dated November 23, 2016
- PLTU CIREBON 1X 660MW PELAKSANAAN PENGELOLAAN DAN PEMANTAUAN LINGKUNGAN dated April 12, 2016
- Inquiries with respect to Cirebon Coal-fired Power Plant Project in West Java, Indonesia (Acceptance No. 1601) dated December 14, 2016
- Answers to the Inquiries regarding the Objection Paper on the Cirebon Coal-fired Power Plant Project in West Java, Indonesia dated January 23, 2017
- Community Empowerment Program 2014
- ANALISIS DAMPAK LINGKUNGAN HIDUP (ANDAL) RENCANA PEMBANGUNAN DAN OPERASI PEMBANGKIT LISTRIK TENAGA UAP (PLTU) CIREBON STAGE 1 KAPASITAS 1 X 660 MW DESA KANCHI KULON KECAMATAN ASTANAJAPURA KABUPATEN CIREBON JAWA BARAT (April, 2008)

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Results of Examination

1. Formality requirements of the request

All items are written in Japanese, English or the official language of the country in vhich the Requester resides.

There are items the descriptions of which are insufficient.

(Items the descriptions of which are insufficient:_

2. Requirements to commence the procedures

(1) Requirements regarding the Requester

The request has been submitted by two or more residents in the country in which the	1
project is implemented.	
The request does not satisfy the above requirement.	
The fact that the request has been submitted by the Requester cannot be confirmed.	

(2) Project with respect to which the objections are submitted

As a result of identifying the project based on the request, it has been confirmed that	1
it is a project for which JBIC provides funding.	
As a result of identifying the project based on the request, it has been confirmed that	

it is not a project for which JBIC provides funding.

The project cannot be identified based on the request.

Note: One project out of two mentioned on page 2 of the objections (Acceptance No.1601) as shown below is not subject to the Procedure, because the request was submitted before the time when a loan agreement for the project is executed.

[Irrelevant project]

• The Cirebon Coal-fired Power Plant Project - Unit 2 with a capacity of 1,000 megawatt

⁽³⁾ Period

The request was submitted during the period between the time when a loan	
agreement was executed and the time when drawdown was completed.	
The request was submitted on or before the time when a loan agreement was	
executed and, therefore, it is appropriate to transfer the request to the Operational	
Department for examination.	
The request was submitted after the completion of disbursement and JBIC's	✓
non-compliance with the Guidelines concerning JBIC's monitoring was pointed out.	
The request was submitted after the completion of disbursement but JBIC's	
non-compliance with the Guidelines concerning JBIC's monitoring was not pointed	
out.	

(4) Substantial damage actually incurred by the Requester or substantial damage likely to be incurred by the Requester in the future as a result of JBIC's non-compliance with the Guidelines with regard to the project which JBIC provides funding

Substantial damage actually incurred or substantial damage likely to be incurred in
the future is described.Image actually incurred or substantial damage likely to be incurred in

the future is not described.

(5) Relevant provisions of the Guidelines considered by the Requester to have been violated by JBIC and the facts constituting JBIC's non-compliance alleged by the Requester

Provisions not complied with and the facts of non-compliance are fairly and reasonably described.

Provisions not complied with and the facts of non-compliance are not fairly and reasonably described.

Note: Two provisions out of six mentioned on pages 7-9 of the objections (Acceptance No.1601) as shown below are not subject to the Procedure, because they are irrelevant to the monitoring provisions of the Guidelines.

[Irrelevant provisions of the Guidelines]

• page 8: (Compliance with Laws, Standards and Plans) Para 1.

- page 8: (Involuntary Resettlement) Para 2.
- (6) Causal nexus between JBIC's non-compliance with the Guidelines and the substantial damage

Description of causal nexus is fairly reasonable.	1
Description of causal nexus is not considered to be fairly reasonable.	

(7) Facts concerning the Requester's consultation with the Project Proponent

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Note: The Agent of the Requesters had dialogues with the Project Proponent.

(8) Facts concerning the Requester's consultation with JBIC

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Note: The Agent of the Requesters had communication with JBIC.

(9) Prevention of abuse

There is no concern that the request was submitted for abusive purposes.	
There is a concern that the request was submitted for abusive purposes and,	
therefore, it is inappropriate to commence the procedures.	
There is a serious false description in the request.	

(Describe the reasons why the request is considered to have been submitted for abusive purposes or the matters that are considered to be false.)

[THE END]