



Asian Development Bank

19 December 2025

Global Alliance for Incinerator Alternatives (GAIA) Asia Pacific

Attention: **Ms. Mayang Azurin**

Re: **ADB's response to GAIA's email to ADB on 3 December 2025 regarding
THA: GWTE Circular Economy Project (Project Number: 58132-001)**

Dear Ms. Mayang Azurin,

Thank you for your email sent to members of the ADB Board, Management and staff on 3 December 2025, setting out your concerns regarding the THA: GWTE Circular Economy Project (Project Number: 58132-001). This letter responds to the issues raised.

GAIA Concern: Under categorization of safeguards, the risk should not have been under the non-objection approval process.

ADB Response: The THA GWTE Circular Economy Project meets ADB's criteria for Board approval via the no-objection procedure. Comprehensive environmental assessments were completed, including Code of Practice (CoP) reports to meet Energy Regulatory Commission (ERC) requirements, Initial Environmental Examinations (IEE) to meet the Industrial Estate Authority of Thailand (IEAT) requirements, and Environmental and Social Impact Assessments (ESIAs) to meet lenders requirements, all in line with Thai regulations and lender requirements including ADB's. Although WTE plants under 10 MW are exempt from full Environmental Impact Assessments in Thailand, the projects have undergone Code of Practice and Initial Environmental Examination and the reports were completed for each project, in line with ERC and IEAT requirements, fulfilling all necessary reporting and approval steps.

Strict fuel management at the projects ensures only non-hazardous, processed industrial waste is used, minimizing emissions of hazardous substances. Advanced air pollution control systems and continuous emissions monitoring are in place, with modeling confirming compliance with Thai, World Bank, and EU air quality standards for stack emissions (including, total suspended particulates (TSP), SO₂, NO_x, HCl, CO, Hg, Cd, Cr⁶⁺, As, Ni, dioxins and furans) and ambient air quality (including, TSP, PM₁₀, PM_{2.5}, SO₂, NO₂, HCl, Hg, Cd, Pb, Cr⁶⁺, As, Ni, dioxins and furans). The project's design ensures contribution to degraded airsheds will be below 5% of relevant pollutant standards. Waste management plans will be established for ash handling, storage, and disposal, with procedures in place to ensure legal compliance and environmental safety.

GAIA Concern: Non-compliance with project disclosure requirements. The project has no project data sheet (PDS).

ADB Response: PDS has been disclosed on 18 December 2025. Affected communities have been able to access environmental and social information related to the projects in English and

Thai on the project websites ([Get Green Power](#), [Suntech Innovation Power](#)) since 20 November 2025.

Following the principles of ADB's Access to Information Policy, disclosure of the Project Data Sheet is made no later than 30 calendar days before consideration by the Board or the President, unless, in ADB's determination, a policy exception would be applicable. Following the precedent of many of ADB's private sector projects, and especially with publicly-listed clients or project sponsors, ADB will disclose a limited Project Data Sheet upon project signing to minimize the sensitivity of commercially sensitive and confidential information to financial markets. The project was signed on 11 December 2025.

GAIA Concern: WTE incineration projects are climate-intensive.

ADB Response: The project supports Thailand's Alternative Energy Development Plan 2018-2037 which sets a target capacity of 75 MW renewable energy generation from industrial waste by 2037, and the draft Alternative Energy Development Plan 2024-2037 which increases this target to 249 MW by 2037. The operation also supports the implementation of Thailand's Zero Industrial Waste to Landfill policy, which promotes diversion of industrial waste from landfills through recycling, resource recovery, and energy generation.

ADB's estimation of the avoided greenhouse gas emissions is based on Intergovernmental Panel on Climate Change (IPCC) guidelines for emissions from landfill and waste incineration. By avoiding greenhouse gas emissions from landfilling and displacing grid electricity, the project is estimated to reduce greenhouse gas emissions. By diverting up to 0.62 million tons of industrial waste annually from landfills, the project will contribute meaningfully to the Long-Term Low Greenhouse Gas Emission Development Strategy's objective of mitigating emissions from the waste sector.

GAIA Concern: Poor exercise of due diligence in endorsing the project to the Board.

ADB Response: The ADB conducted integrity due diligence on the twelve Special Purpose Vehicles (Borrowers); their owners (Get Green Power Company Ltd. and Suntech Innovation Power Company Ltd.); the Sponsor, Gulf Development Public Company Limited (Gulf); their shareholders, boards of directors and key management; and significant contracting entities (SCEs). The review identified integrity and reputational risks associated with certain SCEs, along with relevant mitigating factors. Overall, ADB considers these risks acceptable.

GAIA Concern: Five of the proposed plants are under scrutiny by the National Human Rights Commission of Thailand.

ADB Response: Regarding the National Human Rights Commission (NHRC) investigation into public hearing processes at several plants, some communities alleged exclusion and use of security forces. ADB reviewed these claims during due diligence, including discussions with community representatives and review of records. The review found that information was appropriately shared, relevant groups were represented, and no evidence of improper use of security forces was identified. Where disruptions occurred, additional hearings were held to ensure broader participation. Engagement remains ongoing, with continued consultations and grievance mechanisms in place. Each subproject has an environmental monitoring committee and a stakeholder engagement plan to ensure ongoing dialogue, accountability, and transparency with affected communities. ADB will continue to monitor the project during implementation.

The waste-to-energy plants under this project – with installed capacity of 9.9 MW – are exempt from full Environmental Impact Assessments under Thai law, but Code of Practice and Initial Environmental Examination reports were completed for each project, in line with ERC and IEAT requirements. Extensive information disclosure and public consultation processes were implemented in line with regulatory and corporate requirements.

GAIA Concern: Weak country-level safeguards in Thailand were used to categorize this project.

ADB Response: Thailand’s regulations clearly separate municipal solid waste from industrial waste, and these waste-to-energy projects are designed to use only solid recovered fuel (SRF) made from non-hazardous, well-defined industrial waste streams. Strict upstream controls require industrial waste generators to classify, document, and obtain approval for waste removal, with penalties for non-compliance. The SRF manufacturing process ensures only targeted, non-hazardous materials are present, and the combustion system is specifically designed to handle this fuel, minimizing environmental and community impacts.

Only non-hazardous SRF—comprising materials like paper, wood chips, cloth, rubber, leather, and plastics—will be accepted, with hazardous or volatile wastes strictly excluded. The project mandates quarterly fuel quality inspections, including testing for heavy metals, to confirm compliance with environmental standards and ensure the SRF remains non-hazardous.

ADB is committed to openness and transparency and will continue to engage with all stakeholders about its projects, programs and policies.

Best regards,

Asian Development Bank

By:

Name:

Position:



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Director

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