



3 December 2025

**Re: Urging Board to Object GWTE Circular Economy Project**

CC:

**Ms. Annika Seiler**, Principal Energy Specialist, Sectors Group, ADB

**Mr. Priyantha Wijayatunga**, Senior Director, Energy Sector Office, ADB

**Mr. David Morgado**, Senior Specialist, Energy Sector Office, ADB

**Mr. Bruce Dunn**, Director, Office of Safeguards, ADB

**Mr. Winfried Wicklein**, Regional Director, South East Asia Dept, ADB

**Ms. Haidy Ear Dupuy**, Unit Head, NGO and Civil Society Center, ADB

**Mr. Bernard Woods**, Principal Director, Department of Communications and Knowledge Management (DOCK), ADB

We are the Global Alliance for Incinerator Alternatives (GAIA) Asia Pacific and the NGO Forum on ADB, representing over 2,000 civil society organizations in the Asia Pacific region, advocating for shifts in development finance toward environmentally and socially just and sustainable development in the Asia Pacific region.

We are writing to raise grave concerns about the USD92 million project for 12 Waste-to-Energy facilities in Thailand, financed by the [Asian Development Bank](#) (GWTE Circular Economy Project, project number 58132-001) and the [Asia Infrastructure Investment Bank](#) (Gulf Industrial Waste to Energy Project, project number P000868).

As members of the Board, we urge you to express objections to this GWTE Circular Economy Project on the following grounds:

1. **Under categorization of safeguards, the risk should not have been under the non-objection approval process.** This is the first time that ADB will be voting on a WTE incineration project – and not just for one WTE plant, but 12 WTE plants all in one process. WTE incineration is globally known to emit [hazardous pollutants in each phase of the incineration process](#). This includes [persistent organic pollutants \(POPs\)](#), including dioxins and furans, considered ‘silent killers’ due to their toxic, bioaccumulative, and

long-persistent nature, because they can cause cancers, damage the nervous system, cause reproductive disorders, endocrine and immune system disruption, and developmental problems in children. POPs are regulated for eventual phase-out by the Stockholm Convention on POPs, signed by 152 countries worldwide. Recent biomonitoring data and results in European WTE incinerators in [Slovakia](#), the [Netherlands](#), and [Spain](#) – often described as safe and modern – have revealed high levels of dioxins and furans in eggs and nearby vegetation. WTE incineration processes also produce high quantities of heavy metals, nitric oxide, sulfur oxides and dioxides, particulate matter, lead, PFAS, volatile organic compounds, and [microplastics](#).

2. **Non-compliance with project disclosure requirements. The project has no project data sheet (PDS)**, which is a requirement in the ADB's Access to Information Policy. Only the Social Compliance Audit Reports were disclosed on the ADB website dated 27 October 2025, and [Environment and Social Impact Assessments dated 3 December 2025 \(only uploaded today\)](#). ADB also only informed stakeholders through a news blast on November 18, 2025. The period and approach of disclosure is a breach of its own disclosure policy, preventing civil society organizations and communities from responding, acting, and raising the risks to inform decision-makers on these projects.
3. **WTE incineration projects are climate-intensive.** WTE incineration releases a large amount of greenhouse gases, especially carbon dioxide, from the combustion of fossil-based plastics in the waste stream. In the UK, for example, incinerators released nearly 11 million tonnes of CO2 in 2017, with about half from plastics. There are no baseline assessments of carbon emissions and methodologies for assessing the carbon-reduction claims. There is no unified lifecycle assessment from the extraction of waste feedstock. The European Union has excluded WTE incineration from its [sustainable finance taxonomy](#), saying it does significant harm to the circular economy and waste prevention, reuse, and recycling, which are considered to have a greater contribution to climate change mitigation and energy savings.
4. **Poor exercise of due diligence** in endorsing the project to the Board. Thailand-based civil society groups say that these 12 WTE plants are all owned by Gulf Development Public Company Limited, a company that has a history of Strategic Lawsuit Against Public Participation (SLAPP) suits and other malpractices aimed at draining defendants' financial and emotional resources through expensive, protracted litigation.
  - a. **Five of the proposed 12 WTE plants in Me Preme, Phrao Fa, Green Care Prao Power, and Mee Kwan, included in ADB's financing, are under scrutiny by the [National Human Rights Commission \(NHRC\) of Thailand](#).** Local residents in February 2024 filed complaints due to a lack of public participation and stakeholder participation in the public hearings for the permit application being blocked. Seven industrial waste-to-energy power plants in three eastern regions, each with an installed capacity of 9.9 megawatts, do not comply with the EIA requirements for power plants of 10 megawatts or more. Small power plants must prepare a Code of Practice (CoP) report in accordance with the Energy Regulatory Commission (ERC) regulations on the criteria for preparing a Code of Practice report and reporting the results of compliance with the Code of Practice for electricity generation operations, B.E. 2565 (ERC regulations on the criteria for preparing a CoP report) which requires companies to engage in meaningful consultation with communities. Further, the NHRC considered that public hearings are a procedural right

used as a tool to advance substantive rights protection. The exclusion of petitioners and dissenting individuals from attending the meeting, the restriction of their right to express their opinions, and the presence of behavior that intimidated attendees from expressing their opinions constitute a lack of genuine public participation. These waste power plants are situated near residential and economic activities, which many communities strongly oppose due to health and livelihood impacts.

b. **Weak country-level safeguards in Thailand were used to categorize this project.** Thailand does not yet have a strong law on waste separation, which means WTE plants will receive poorly segregated waste, leading to a severe impact on communities living around these waste power plants. It also does not yet have a Pollutant Release and Transfer Register (PRTR) law, a publicly accessible database that tracks chemicals and pollutants to ensure transparency and accessibility of pollution info for citizens and effective monitoring of dioxins. This co-financed project with ADB as the lead co-financier, according to AIIB's website, has been assessed under ADB's Safeguard Policy Statement (SPS). As permitted under AIIB's Environmental and Social Policy (ESP), ADB's SPS will apply to the Project in lieu of AIIB's ESP to ensure a harmonized approach. It is incumbent on ADB to exercise the highest due diligence on this project for 12 WTE plants.

On these grounds, **we urge members of the Board to use its authority to exercise oversight on this project. WTE plants are high-risk projects that require meaningful participation, the use of best alternative technologies analysis, and alignment with standards in international laws set forth in the Basel, Rotterdam, and Stockholm conventions, the Aarhus Convention, the Paris Agreement, and international human rights law.** Approving this project through the non-objection approval process sets a dangerous precedent in ADB and undermines the Bank's ability to meet its climate ambitions.

Sincerely,



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NGO Forum on ADB