

# Finding a Solution to the Problems

Learning from the **Asian Development Bank (ADB)**  
Accountability Mechanism on the Negative Impacts of  
the PLTGU Jawa-1

**FINDING A SOLUTION TO THE PROBLEMS: LEARNING FROM THE ASIAN DEVELOPMENT BANK (ADB)  
ACCOUNTABILITY MECHANISM ON THE NEGATIVE IMPACTS OF THE PLTGU JAWA-1**

©The Indonesian Coalition for Monitoring Infrastructure Development, 2025

Authors: **Meiki Wemly Paendong, Siti Aminah Tardi, Putri Rodiyatul Mardiyah**

Editor and Proofreader: **Siti Aminah Tardi, Renata Arianingtyas**

Cover: **Adzan Bintang Aslama**

Photos: **Iqbal Kusumadirezza**

Translator: **Yenny Chusna Khustina**

Published by:

**The Indonesian Coalition for Monitoring Infrastructure Development (KPPH)**

supported by

**Just Finance International (JFI), 2025**

National Library of the Republic of Indonesia, Catalog Data in Publications (KDT)

**Finding a Solution to the Problems:**

**Learning from the Asian Development Bank (ADB)**

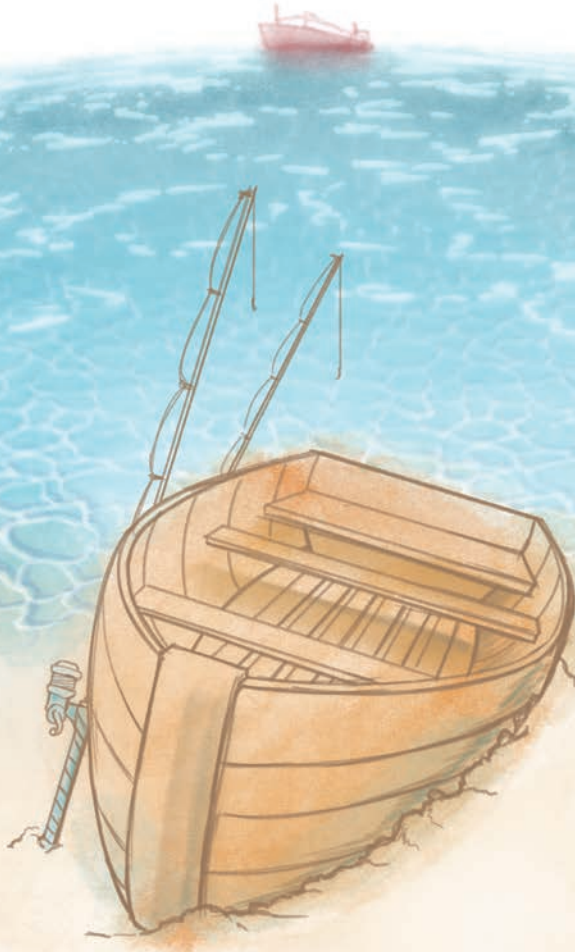
**Accountability Mechanism on the Negative Impacts of the PLTGU Jawa-1**

xii + 32 page, Desember 2025

Copyright is protected by law

# Finding a Solution to the Problems

Learning from the **Asian Development Bank (ADB)**  
Accountability Mechanism on the Negative Impacts of the PLTGU Jawa-1



**The Indonesian Coalition for Monitoring Infrastructure Development (KPPII)**  
Jakarta, 2025



# Preface

Over the past two decades, infrastructure developments in Indonesia, such as those in the energy sector, have become a national priority program aimed at driving economic growth. Priority projects are financed through, among other things, loans from Multilateral Development Banks (MDBs), including the Asian Development Bank (ADB). Despite the goals, various new issues have emerged, ranging from unequal benefits to environmental and social impacts faced by the communities around the project sites.

In this context, it is crucial to ensure that every development project financed by multilateral institutions is implemented in accordance with environmental and social safeguards, adhering to the principles of accountability, transparency, and protection of the rights of the impacted communities. Violations of bank policies and/or impacts on the communities and environment require justice and redress. Multilateral Development Banks have sets of complaint mechanisms available to the public. The Indonesian Coalition for Monitoring Infrastructure Development (KPPIL) monitors projects' compliance with banks' environmental and social safeguards mechanisms, and holds banks accountable for the impacts caused by the projects they finance. Among these, the Accountability Mechanism, established by institutions like the ADB, is a formal channel people can access when facing negative impacts caused by the ADB-funded projects.

This report aims to provide an overview and lessons learned on how the ADB's Accountability Mechanism can be used to respond and find solutions to the negative impacts caused by development projects financed through ADB loans. In this case, the report focuses on the Jawa-I Steam Gas Power Plant (PLTGU Jawa-I) Project.

This report summarizes the experiences of the communities impacted by the PLTGU Jawa-I Project in Muara Village, Cilamaya, Karawang Regency, West Java, in their efforts to seek accountability for the environmental and social damages caused by the project. The development has caused them losing their livelihoods as well as declining seawater

quality, decreasing groundwater discharge, and various disruptions to their daily life. Numerous complaints have been raised since the early stages of the project, but most have not been adequately responded by the state company nor the ADB.

After various fruitless diplomatic and advocacy efforts, fishers along with the KPPII decided to use the ADB Accountability Mechanism. The mechanism allows people to formally file their complaints as well as request dialogue-based resolutions or a review of the ADB's compliance with its safeguard policies. In May 2025, the initial mission by the Office of the Special Project Facilitator (OSPF) team was finally carried out, including direct meetings with affected communities in Karawang.

The experience of using this accountability mechanism demonstrates that there is a formal channel for people to access justice for project impacts, yet at the same time also reveals structural challenges in its implementation. The bureaucratic, non-legally binding processes that rely on the goodwill of the involved parties pose serious obstacles to the restoration of community rights. As of the time this report was written, the accountability mechanism process is still ongoing and faces various challenges. However, this experience is important as a collective learning process in advocating for the rights of the impacted communities, while also serving as a reminder that financing large-scale projects must go hand-in-hand with a strong oversight and accountability system for the people and their living spaces.

We extend our gratitude to all parties who have provided support, input, and assistance during the preparation of this report. We hope this report will be beneficial and serve as a constructive contribution to strengthening development accountability mechanisms in Indonesia.

On behalf of the Indonesian Coalition for Monitoring Infrastructure Development (KPPII)

**Siti Aminah Tardi**

# Table of Contents

<b>Preface</b>	<b>v</b>
<b>Table of Contents</b>	<b>vii</b>
<b>Glossary and Abbreviations</b>	<b>ix</b>
<b>List of Photos, Figures, and Charts</b>	<b>xii</b>
<b>I. LOANED POWER</b>	<b>I</b>
1.1 The PLTGU Jawa-I Profile	I
1.2 The ADB financing for PLTGU Jawa-I	4
<b>2. DEVELOPMENT IMPACTS: DAMAGING NATURAL SERVICE QUALITY AND FUNCTIONS</b>	<b>7</b>
2.1 Reducing natural services for local economic source	7
2.2 Fishers' Damaged Fishing Gears	8
2.3 Loss of Safety at Sea	9
2.4 Narrowing Rice Field Irrigation Channels	9
2.5 Noise Levels	10
2.6 Cracked Buildings	10
2.7 Decreasing Groundwater Discharge	10
2.8 Debt Traps and Migration	10
<b>3. THE ADB'S ACCOUNTABILITY MECHANISM</b>	<b>11</b>
3.1 Impacted Community's Initial Efforts	11
3.2 Understanding the ADB Accountability Mechanism	14
3.3 Runtutan Penggunaan Mekanisme di Kasus PLTGU Jawa I	19
<b>4. LESSONS LEARNED</b>	<b>25</b>
<b>Referensi</b>	<b>27</b>

<b>APPENDIX</b>	<b>28</b>
<b>Appendix 1:</b> Petition: PT JSP’s PLTGU Jawa-I Neglects Fishers. The ADB Must Conduct an Independent Reassessment	<b>28</b>
<b>Attachment 2:</b> Letter of Statement and Demand to the ADB: Neglecting the Fate and the Future of Muara Village’s Fishers	<b>29</b>
<b>KPPII Profile</b>	<b>32</b>

## Glossary and Abbreviations

- ADB** Asian Development Bank  
A multilateral financial institution (Multilateral Development Bank) established in 1966 and headquartered in Manila, the Philippines. Its primary objective is to reduce poverty and improve prosperity in the Asia-Pacific region through financial support, grants, and technical assistance.
- BCRC** Board Compliance Review Committee  
A committee under the ADB Board of Directors whose primary functions are to oversee and decide matters related to the compliance review process—i.e., the review of ADB projects' compliance with its safeguard policies (Safeguard Policy Statement, SPS 2009)..
- CRO** Complaint Receiving Officer  
An independent official at the ADB who serves as the entry point for all formal complaints from communities impacted by the ADB projects. CRO is responsible for receiving, recording, and verifying the completeness of the complaints, and then forwarding them to the appropriate unit.t.
- CRP** Compliance Review Panel  
An independent body within the ADB's accountability system responsible for investigating whether the ADB has complied with its policies, procedures, and socio-environmental standards (safeguards) in the implementation of its financed projects.
- IPP** Independent Power Producer  
A non-government company that builds, owns, and operates power plants to sell electricity to other parties.
- JBIC** Japan Bank for International Cooperation  
A Japanese government financial institution mandated to support international economic development, strengthen Japan's economic relations with other countries, and ensure global economic stability

- JSP** Jawa Satu Power  
A special purpose company established to design, build, own, and operate the PLTGU Jawa-I project .
- KPPII** *Koalisi Pemantau Pembangunan Infrastruktur Indonesia*  
(The Indonesian Coalition for Monitoring Infrastructure Development), Sometimes referred to as the Indonesian Coalition for Monitoring Infrastructure (abbreviated as KPPI or KPPII in some documents)— a network/coalition of civil society organizations (CSOs) as well as environmental, legal aid, and human rights advocacy organizations that monitor the social, environmental, and human rights impacts of infrastructure development (including large-scale projects) in Indonesia.
- KUD** Koperasi Unit Desa  
A community-based economic organizations in rural areas whose members are villagers, engaged in various business sectors, such as agriculture, trade, savings and loans, and other services.
- LNG** Liquefied Natural Gas  
Natural gas that has been cooled down to a liquid state for easy storage and long-distance transportation.
- MUFG** Mitsubishi UFJ Financial Group  
One of the world's largest financial and banking groups, from Japan..
- NEXI** Nippon Export and Investment Insurance  
A Japanese government-owned export insurance agency that provides guarantees and protection against risks in exports, investments, and international projects involving Japanese companies..
- OCRP** Office of the Compliance Review Panel  
The administrative secretariat that supports the works of the Compliance Review Panel (CRP) at the ADB..
- OSPF** Office of the Special Project Facilitator  
An independent office at the ADB responsible for handling complaints from project-impacted communities through non-judicial and non-adversarial problem-solving mechanismsl.

- PLTGU** **Pembangkit Listrik Tenaga Gas Uap**  
A type of power plant that combines two energy generation systems (gas turbine and steam turbine) into a single unit called a combined cycle power plant
- PSOD** *Private Sector Operation Department*  
A department at the ADB responsible for financing and supporting private sector projects in the ADB member countries without government guarantees.
- PUPUK** **Perkumpulan untuk Peningkatan Usaha Kecil**  
(The Association for the Improvement of Small Businesses), An Indonesian civil society organization (CSO) focusing on community economic empowerment, particularly strengthening small, micro, and cooperative businesses through mentoring, training, and developing sustainable business networks.
- RUEN** **Rencana Umum Energi Nasional**  
(The National Energy Master Plan), A national-level energy planning document containing policies, strategies, and targets for energy management and utilization in Indonesia.
- RUPTL** **Rencana Usaha Penyediaan Tenaga Listrik**  
(The Electricity Supply Business Plan) An official planning document for the national electricity sector outlining the construction and development plans of the electricity supply system.
- SPF** *Special Project Facilitator*  
An independent official at the ADB responsible for leading and implementing the problem-solving function within the ADB Accountability Mechanism framework.

## List of Photos, Figures, and Charts

<b>Photo 1 : Jawa-I FSRU Vessel</b>	<b>3</b>
<b>Photo 2: Dwindling Fish Catches</b>	<b>7</b>
<b>Photo 3: Inspecting Nets</b>	<b>8</b>
<b>Photo 4: Frequently Damaged Light Buoy</b>	<b>9</b>
<b>Photo 5: Fishers Fishing Next to the FSRU</b>	<b>11</b>
<b>Photo 6: The PLTGU Jawa-I at Night</b>	<b>25</b>
<b>Photo Appendix a</b>	<b>30</b>
<b>Photo Appendix b</b>	<b>30</b>
<b>Figure 1: PLTGU Jawa-I Components</b>	<b>2</b>
<b>Figure 2: Summary of the PLTGU Jawa- I Loan from the ADB</b>	<b>4</b>
<b>Figure 3: Petition</b>	<b>28</b>
<b>Figure 4: The Restricted Zone</b>	<b>31</b>
<b>Chart 1: Fishers Advocacy Timeline</b>	<b>12</b>
<b>Chart 2: The ADB Accountability Mechanism</b>	<b>15</b>
<b>Chart 3: The Procedure and Steps to File a Complain</b>	<b>16</b>

# I. LOANED POWER

## I.1 The PLTGU Jawa-I Profile

Demand for electricity in Indonesia grows approximately 6–7% annually, particularly in the Java and Bali regions, which are the country’s centers of industrial and economic activities. To increase the national installed power capacity, the Government of Indonesia (GOI) launched the 35,000-Megawatt Power Plant Development Acceleration Program (35,000 MW Program).

The Program was launched by President Joko Widodo in May 2015 and is one of the national strategic projects in the energy sector. The primary objectives of the program are to meet the growing national electricity demand, increase the ratio of installed power capacity, reduce dependence on oil-based fuels, promote the use of more efficient primary energy sources such as gas, coal, and renewable energy, and attract private investment through Independent Power Producer (IPP) and public-private partnership (PPP) schemes.

This program is established based on the 2015–2024 PLN Electricity Supply Business Plan (RUPTL), which outlines projections for electricity demand and power plant construction sites<sup>1</sup>, the National Energy Master Plan (RUEN)<sup>2</sup>, and Presidential Regulation No. 4 of 2016 on the Acceleration of Power Infrastructure Development<sup>3</sup>. Of the total 35,000 MW,

---

<sup>1</sup> Indonesia (2015). Rencana Usaha Penyediaan Tenaga Listrik (RUPTL) PT PLN (PERSERO) 2015–2024. Accessed from [gatrik.esdm.go.id/assets/uploads/download\\_index/files/87b45-ruptl-pln-2015-2024.pdf](http://gatrik.esdm.go.id/assets/uploads/download_index/files/87b45-ruptl-pln-2015-2024.pdf)

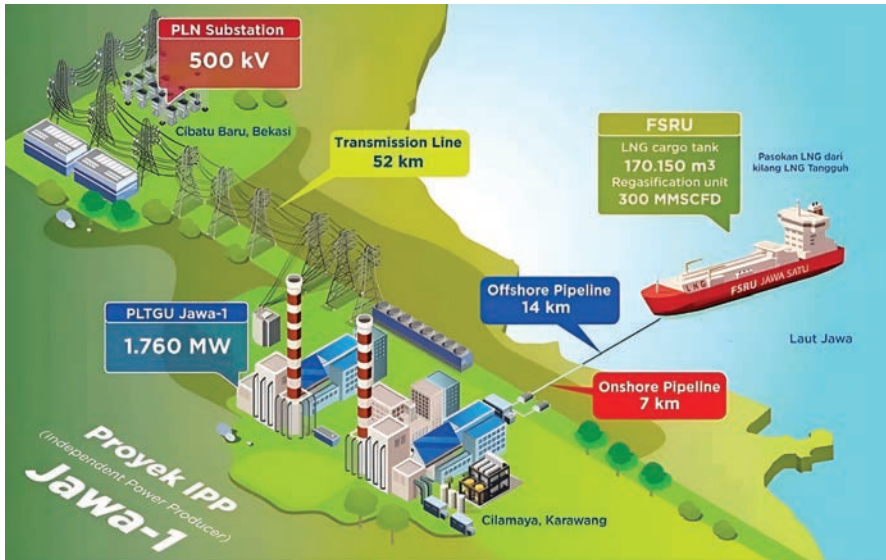
<sup>2</sup> Indonesia (2017). Peraturan Presiden Republik Indonesia Nomor 22 Tahun 2017 Tentang Rencana Umum Energi Nasional. Accessed from [esdm.go.id/assets/media/content/content-rencana-umum-energi-nasional-ruen.pdf](http://esdm.go.id/assets/media/content/content-rencana-umum-energi-nasional-ruen.pdf)

<sup>3</sup> Indonesia (2016). Peraturan Presiden (Perpres) Nomor 4 Tahun 2016 tentang Percepatan Pembangunan Infrastruktur Ketenagalistrikan. Accessed from PERPRES No. 4 Tahun 2016

approximately 25,000 MW are planned to be developed by private sector (IPP) and 10,000 MW by State-Owned Enterprise (PLN). The power plant projects are distributed across Indonesia, with a primary focus on Java–Bali ( $\pm 55\%$ ) and Sumatra ( $\pm 20\%$ ). One of the program’s key projects is the PLTGU Jawa-1 (1,760 MW), developed under the IPP scheme, utilizing Combined Cycle Gas Turbine (CCGT) technology.

The PLTGU Jawa-1 project is the first in Indonesia to integrate a power plant with a floating storage and regasification unit (FSRU). This means that liquefied natural gas (LNG) is converted into gas on-site. Increasing the use of natural gas will help the government achieve the target of 23% electricity generation from renewable energy sources. This measure is claimed to support the energy transition agenda from solid fossil fuels (coal) to cleaner fossil fuels, which are in accordance with the RUEN’s targets and the Paris Agreement commitment (Indonesia’s NDCs) to reduce carbon emissions

Figure 1: PLTGU Jawa-1 Components



Source: Project Highlights – Jawa Satu Power

The PLTGU Jawa-1 project consists of a Combined Cycle Gas Turbine (CCGT) Power Plant, an FSRU for LNG, a 500kV power transmission

line, a substation, and an offshore pipeline. Gas from the FSRU is channeled to the power plant via a ±21-km-long offshore pipeline.

Located in Cilamaya Village, Karawang Regency, West Java, the construction of the PLTGU Jawa-I began on 6th December 2018 on a 36.7 ha site, and was completed on 12th December 2021. The construction of the power plant and gas pipeline took place on lands previously used as rice fields farmed by the local community. In addition, the construction of the offshore gas pipeline and gasification unit were built in fishing areas.

Photo 1 : Jawa-I FSRU Vessel



Photo by: Iqbal Kusumadirezza

The total value of the PLTGU Jawa-I is approximately IDR 26 trillion (USD 1.8 billion). The financing was obtained through loans from the Asian Development Bank (ADB), Japan Bank for International Cooperation (JBIC), Nippon Export and Investment Insurance Co Ltd (NEXI), and several private commercial banks, including Mizuho Bank Ltd, MUFG Bank Ltd, Oversea-Chinese Banking Corporation Ltd, Crédit Agricole Corporate and Investment Bank, and Société Générale. 51112-001: Jawa-I Liquefied Natural Gas-to-Power Project | Asian Development Bank.

## I.2 The ADB financing for PLTGU Jawa-1

As of 31st December 2024, the ADB had provided 842 public sector loans, grants, and technical assistance worth USD 48.2 billion to Indonesia. Active loans covered 23 projects worth USD 5.88 billion. The bank provided loans for projects related to water services, marine debris reduction, energy, and finance. In the energy sector, it supports the transition toward cleaner energy sources through financing projects such as the PLTGU Jawa1.

Figure 2: Summary of the PLTGU Jawa- 1 Loan from the ADB

PROJECT AT A GLANCE			
<b>1. Basic Data</b>		Project Number: 51112-001	
<b>Project Name</b>	Jawa-1 Liquefied Natural Gas-to-Power Project	<b>Department /Division</b>	PSOD/PSIF2
<b>Country</b>	Indonesia		
<b>Borrower</b>	PT. Jawa Satu Power		
<b>2. Sector</b>		<b>Financing (\$ million)</b>	
✓ Energy	Conventional energy generation		250.00
		<b>Total</b>	<b>250.00</b>
<b>3. Strategic Agenda</b>		<b>Climate Change Information</b>	
Inclusive economic growth (IEG)	Subcomponents Pillar 2: Access to economic opportunities, including jobs, made more inclusive	CO <sub>2</sub> reduction (tons per annum)	1,770,000
		Climate Change Impact on the Project	Low
<b>4. Drivers of Change</b>		<b>Gender Equity and Mainstreaming</b>	
Partnerships (PAR)	Components Commercial cofinancing Official cofinancing Private Sector	Some gender elements (SGE)	✓
Private sector development (PSD)	Promotion of private sector investment		
<b>5. Poverty and SDG Targeting</b>		<b>Location Impact</b>	
Geographic Targeting	No	Rural	High
Household Targeting	No	Urban	Medium
SDG Targeting	Yes		
SDG Goals	SDG7		
<b>6. Nonsovereign Operation Risk Rating</b>			
<b>Obligor Name</b>		<b>Final Project Rating</b>	<b>Facility Risk Rating</b>
PT. Jawa Satu Power			
<b>7. Safeguard Categorization</b> Environment: A Involuntary Resettlement: B Indigenous Peoples: C			
<b>8. Financing</b>			
<b>Modality and Sources</b>		<b>Amount (\$ million)</b>	
<b>ADB</b>		250.00	
Nonsovereign LIBOR Based Loan (Regular Loan): Ordinary capital resources		250.00	
<b>Cofinancing</b>		<b>150.00</b>	
Leading Asia's Private Infrastructure Fund (LEAP) (Full ADB Administration)		150.00	
Others		0.00	
<b>Others*</b>		<b>1,012.90</b>	
<b>Total</b>		<b>1,412.90</b>	

Based on The Proposed Loan and Administration of Loan for PT Jawa Satu Power (Jawa-1 Liquefied Natural Gas-to-Power Project, Indonesia) document, the total loan for this project is stated as USD 250,000,000. The document also outlines proposed co-financing loan of up to USD

150,000,000 to be provided by the Leading Asia's Private Infrastructure Fund (LEAP).

The ADB categorizes the project's impacts in accordance with its Safeguard Policy Statement (SPS) as follows:

1. Category A for environmental impacts (high);
2. Category B for resettlement (moderate); and
3. Category C for indigenous peoples (low)

The document acknowledges that the PLTGU Jawa-I Project will have various environmental impacts, including: (1) potential impacts on mangroves and bird habitats, which will be mitigated by protecting and restoring remaining coastal vegetation to prevent extinction; (2) the 52-kilometer transmission line will traverse rice fields, waterways, roads, and villages. The design, placement, and height of transmission towers as much as possible will minimize noise, electromagnetic fields, health and safety risks, and other environmental impacts; (3) air pollutants in the form of nitrogen dioxide (NO<sub>2</sub>); (4) seawater will be used for all water requirements, including closed-loop cooling. Wastewater will be treated on-site, and discharge will comply with IFC and Indonesia's seawater guidelines; (5) the dredging volume for the jetty and pipeline will be 45,981 m<sup>3</sup>, lower than the initially proposed 80,000 m<sup>3</sup>. The dredged material must be disposed of on the seabed adjacent to the work area. Impacts on fishers and other potential risks are taken into account as part of the ESIA; and (6) noise levels around the project site will exceed the criteria.

Regarding land requirements, the project required land acquisition for the power plant, onshore pipeline, jetty, pump house, transmission line tower footings, and substation. The lands were generally acquired through voluntary sale negotiations (willing buyer–willing seller), while the land for the power plant was obtained from Pertamina Gas (Pertagas) through land ownership transfer. Indonesia, as the borrower, had prepared a resettlement plan for land acquisition as well as a livelihood restoration program for impacted landowners.

The SPS for indigenous peoples belongs to category C, as no recognized indigenous peoples were identified at the project site. The locals are generally of Sundanese ethnicity, a mix of Sundanese and Javanese, or a

mix of Sundanese and Betawi, who are not considered to have collective attachment to the land and its natural resources.

On the other hand, the PLTGU Jawa-I project had already begun in 2018. However, it was only in March 2019 did the JSP start preparing an impact management plan recognized by the ADB, and the plan was implemented as of October 2023. One of the components was resettlement plan for addressing livelihood recovery aspect.

The implementation of the livelihood recovery program was assigned to a third party, i.e., the Association for the Improvement of Small Businesses (PUPUK), an organization focusing on small business establishment. They were specifically contracted by the power company to address the impacted communities' social and economic losses. However, challenges arose as the community rejected the business model proposed by the organization. Only a small minority agreed and insisted on continuing. Eventually, this led to internal conflict among the beneficiaries implementing the program.

## 2. DEVELOPMENT IMPACTS: DAMAGING NATURAL SERVICE QUALITY AND FUNCTIONS

### 2.1 Reducing natural services for local economic source

Photo 2: Dwindling Fish Catches



Photo by: Iqbal Kusumadirezza

In the area where the PLTGU Jawa-I operates, locals have various livelihoods. These include rice farmers, various types of fishers (line, pond, net, offshore, etc.), and satay stick makers. Some have multiple jobs, such as farming and making satay stick. The operation of the PLTGU Jawa-I has caused a decline in their income and impacted their livelihoods.

For locals who previously worked as farmers and satay stick makers, after their farmlands were transferred to the Jawa Satu Power (JSP) company, they now rely solely on making satay sticks. As for other farmers, the narrowing of the irrigation channels has caused flooding in their rice fields for months, leading to crop failures and causing them financial losses.

For fishers, the construction of the PLTGU Jawa-I has caused:

- Siltation of the estuary. The pipelines have obstructed water and mud from the river flowing into the sea as well as increased sedimentation, shallowing the estuary. The siltation has also hindered river boats. This situation is exacerbated by construction materials (stones) that spilled over from ships and were not handled by the JSP. During low tide, fishing boats are unable to reach the sea, forcing them go out only during high tide.
- Damage to the marine ecosystem. Activities during the project construction and routine cleaning of seawater intake pipelines have caused the seawater to become increasingly turbid that eventually led to declining fish populations. Fishers are forced to fish farther out to sea. Previously, their daily income was around IDR 300,000, but today it's only IDR 100,000, and often they are unable to catch any fish at all.
- Increased operational costs. The dwindling fish population has forced fishers to fish farther, even to other areas, increasing their operational costs for fuel and other supplies

These situations have led to the impoverishment among the fishers.

## 2.2 Fishers' Damaged Fishing Gears

Photo 3: Inspecting Nets



Foto: Iqbal Kusumadirezza

The installation of gas pipelines connecting the FSRU to the PLTGU includes numerous protrusions from bolts and pipe joints. Offshore pipelines in fishing grounds often cause fishers' nets to become entangled and torn. Damage to their fishing gears affects their incomes, as repairing torn nets required both time and cost

### 2.3 Loss of Safety at Sea

Fishing boats are prone to struck the offshore pipelines, forcing the fishers to be constantly alert. They said, "can't relax" and "can't sleep", when they returned from fishing, especially before dawn, reflecting that they lost their sense of safety at sea. There is also another case where a fishing boat capsized and sank, but there was no party taking responsibility, exacerbating their loss of safety. This is not only about ensuring human safety, but also about the safety of boats, as damaged or sinking boat impacts fishers' livelihood.

Photo 4: Frequently Damaged Light Buoy



Photo by: Iqbal Kusumadirezza

### 2.4 Narrowing Rice Field Irrigation Channels

The project's negative impacts are also experienced by rice farmers. The construction of an access road from the power plant site to the jetty has made the rice field irrigation channels narrower. Consequently, the channels' water capacity decreases, causing rainwater to quickly floods their rice fields. The floodwater also takes a long time to recede. Farmers

ultimately suffer losses due to failed harvest as their crops either fail to grow or rot when submerged. Dust sticking to the rice flowers also contributes to crop failure.

## **2.5 Noise Levels**

Locals living very close to the PLTGU Jawa-I can no longer enjoy the quiet ambiance and comfort they once had. The noise from the power plant causes anxiety, particularly for vulnerable groups such as children and the elderly. Sound described as “explosion” and other noises occur at night. This affects their sleep quality and exacerbates the conditions of those who are ill.

## **2.6 Cracked Buildings**

The construction of the PLTGU Jawa-I caused cracks in locals’ houses. However, not all affected locals got repairs. Even if they did, the repairs were deemed to be careless and unsatisfactory. Consequently, locals repaired their cracked houses themselves.

## **2.7 Decreasing Groundwater Discharge**

Since the construction of the PLTGU Jawa-I, groundwater discharge has been decreasing. Locals’ water pumps can no longer draw shallow groundwater up. This issue has been widely experienced by most locals who depend on groundwater for their daily needs. They claimed that they had complained to the company, but it was denied. JSP company rejected the notion that the decreasing groundwater discharge was caused by the PLTGU Jawa-I.

## **2.8 Debt Traps and Migratio**

Due to their declining income, fishers have become trapped in debt through loan sharks known as Bank Emok. Locals admit that this situation has driven women in the village to work as migrant workers.

# 3. THE ADB'S ACCOUNTABILITY MECHANISM

## 3.1 Impacted Community's Initial Efforts

Photo 5: Fishers Fishing Next to the FSRU



Photo by: Iqbal Kusumadirezza

In the process of pursuing accountability for environmental and social restoration, the voices of project-impacted locals are often overlooked or ignored. Locals and supporting environmental organizations have undertaken several actions, including direct dialogue with the project representatives, collecting data and impact evidences, and advocacy through various channels. These efforts aim to seek constructive solutions and avoid unnecessary conflict escalation.

One of the available approaches for their advocacy is to demand accountability from the ADB as the financing institution of the PLTGU Jawa-I. The bank must be held accountable for the projects it finances and ensure they comply with the provisions of its SPS. This effort was made

in April 2023, i.e., when the KPPII representatives visited the ADB headquarter in Manila to present field findings regarding the impacts of the PLTGU Jawa-1 after monitoring the project for over a year. The impacts of the project were communicated directly to the ADB shareholders and the Private Sector Operations Department (PSOD). The PSOD is part of the bank's internal institutional structure responsible for facilitating financing for private sector and state-owned enterprise projects. The KPPII requested that the PSOD visit the project site to verify the findings.

The ADB, through the PSOD, agreed to conduct an environmental and social review mission. Field visits took place from 29th to 31st May 2023. The PSOD team visited the impacted villages and directly engaged in dialogue with the local communities, including women's groups, farmers who had lost their livelihoods, fishers, and even local elementary school teachers.

Chart 1: Fishers Advocacy Timeline



Following the PSOD team's visit in August 2023, fishers from Muara and Cilamaya Girang villages submitted a petition to the ADB. The petition

raised several crucial issues, among others: the lack of fishers' participation in public consultations and the installation of the undersea gas pipelines that disrupted their fishing grounds, causing accidents, damaging nets, and reducing their income. The deterioration of seawater quality was also stated as a serious threat. They demanded that the ADB conduct an independent reassessment of the negative environmental and social impacts of the PLTGU Jawa-I (see Appendix I).

However, by mid-2024, their requests had not been addressed. Meanwhile, the JSP company launched a livelihood restoration program through a third party, PUPUK. The proposed business programs included compost production and mushroom farming, which later shifted to goat fattening and freshwater fish farming. The fishers rejected the programs as they were considered burdensome and incompatible with their potential as traditional marine fishers for generations.

At the diplomatic level, the KPPII continued their efforts to communicate the violations of the ADB's SPS to the ADB's Board of Directors, specifically to the representatives from the United States and Europe. The online meeting produced tangible outcomes. On 4th November 2023, the PSOD requested input from the KPPII regarding the draft Terms of Reference (ToR) for six aspects of the independent reassessment of environmental and social impacts previously proposed by the KPPII. Later on, the KPPII submitted their recommendations for improvements, including defining the impacted areas, expanding the environmental scope, broadening the definition of impacted parties, and refining the methodology for reassessing livelihood impacts. The PSOD confirmed that the proposed recommendations had been processed, and additionally requested the KPPII to nominate independent experts necessary for field visits.

In January 2024, the PSOD announced that they would send an updated terms of reference to an independent expert. The KPPII subsequently recommended an expert in March 2024. The following day, the PSOD sent an invitation to the recommended expert to discuss the scope of the reassessment. However, the communication was discontinued afterward.

After receiving no further communication from the PSOD, the KPPII requested an update in May 2024. However, the PSOD responded that the update would be provided after they finish their negotiations with the independent expert. Following the last communication in November 2024, the independent expert recommended by the KPPII stated that they had completed the registration process as a consultant, while their national counterpart withdrew. However, since then, there was no further communication from the PSOD to either the expert nor the KPPII. This raises concerns about the commitment of the ADB PSOD in conducting independent and credible reassessment processes.

A second letter of statements and demands from the fishers of Muara Village was sent in June 2024. The letter reaffirmed that the ADB had not addressed their previous request for an independent reassessment. They urged that the reassessment to be conducted in July or August 2024 by an independent expert unaffiliated with the Government of Indonesia nor the JSP company. In the letter, they also reiterated their rejection of the livelihood restoration program initiated by the JSP and PUPUK, deeming it burdensome and irrelevant to their profession. (Appendix 2).

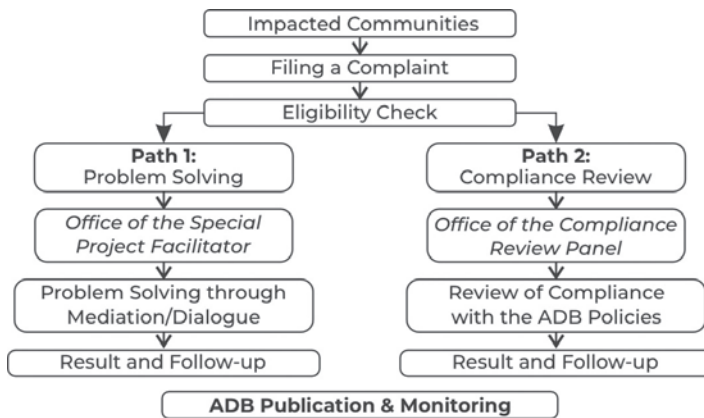
Due to the lack of clarity from the ADB's PSOD, the fishers, with their supporting organizations, decided to use the ADB's accountability mechanism in April 2025.

### **3.2 Understanding the ADB Accountability Mechanism**

The ADB Accountability Mechanism is an independent forum provided for individuals and communities impacted by the ADB-financed projects. Its purpose is to give them an opportunity to raise concerns, seek solutions, and request compliance reviews for alleged violations of the ADB operational policies that may have caused direct and material harm. This mechanism serves as a last resort when problems cannot be prevented or resolved at the project and operational levels.

The flowchart above illustrates the complain process under the ADB Accountability Mechanism, which offers two main pathways for project-impacted communities to file their complaints. The mechanism is designed to ensure that the implementation of the ADB-assisted projects aligns with the bank's established social, environmental, and safeguard policies.

Chart 2: The ADB Accountability Mechanism



The process begins with the impacted community filing a complaint to the Complaint Receiving Officer (CRO). This officer serves as the official entry point for all complaints directed to the bank. The complaint is then screened for eligibility—whether it meets the administrative and substantive criteria set out in the Accountability Mechanism Policy.

If the complaint is deemed eligible, it can proceed through one of two pathways:

1. **The Problem-Solving Function**, led by the Special Project Facilitator (SPF). The SPF works in a non-judicial and non-adversarial manner, meaning it does not assign blame, but rather helps the disputing parties reach a mutually acceptable solution.

The Main Functions of the SPF:

- a. **Facilitating problem-solving.** The SPF helps identify and facilitate practical pathways to resolve problems faced by communities impacted by the ADB-assisted projects. The focus is restorative and collaborative rather than fault-finding.
- b. **Bridging communication.** The SPF acts as an intermediary between the impacted community, the project implementer (borrower or executing agency), and the relevant ADB unit. It also helps overcome communication barriers and rebuild trust among the parties.
- c. **Encouraging joint solutions.** The SPF helps the parties in agreeing on

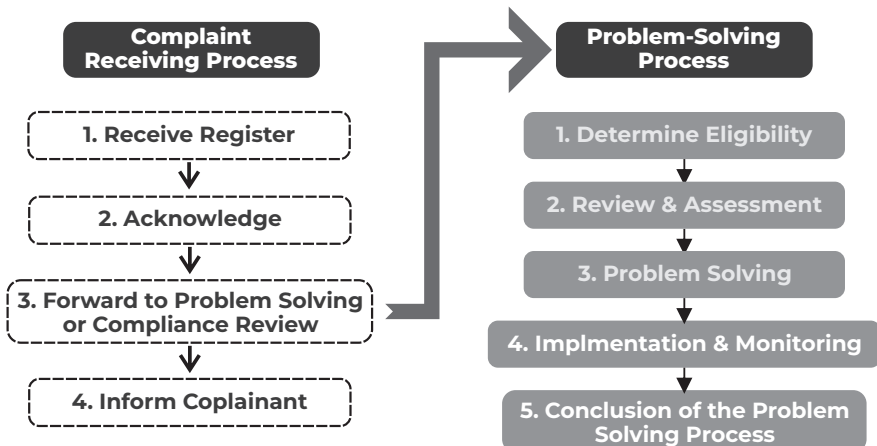
an action plan or a mutually acceptable solution through dialogue, mediation, negotiation, etc.

- d. Monitoring follow-ups. The SPF monitors and reports on the implementation of agreements reached during the facilitation process.
2. **The Compliance Review Function**, managed by the Compliance Review Panel (CRP). The CRP investigates and assesses whether the ADB has violated its own operational policies and procedures that have caused or are likely to cause harm to project-impacted communities. The panel operates independently from the ADB Management, with members serving a single non-renewable five-year term. It reports directly to the ADB Board of Directors, except for certain activities where reports are submitted to the Board Compliance Review Committee (BCRC).

Unlike the Special Project Facilitator (SPF), which focuses on collaborative problem-solving, the CRP conducts in-depth reviews of the ADB's institutional compliance, prepares review reports, and provides recommended corrective actions to the ADB Board of Directors. Through this process, the CRP ensures that the implementation of the ADB projects remains consistent with the principles of accountability, transparency, and the protection of the impacted communities' rights.

The Procedure and Steps to File a Complain

### Complaint Receiving Process and Link to Problem Solving Process



The complaint process begins with the Complaint Receiving Officer (CRO). The process is as follows::

1. **File a Complaint:** Complaints can be filed in any language and through various means (email, fax, letter, etc.) by a group of two or more individuals, or by their authorized representative such as a civil society organization. The complaint must detail the direct and material harm caused by the ADB project, as well as how the ADB allegedly failed to comply with its policies and procedures. The CRO will register the complaint on the Accountability Mechanism website within two days of receipt.
2. **Acknowledgement of Complaint Receipt:** Within two days of receiving the complaint, the CRO will confirm receipt and send the complainant an information package on the Accountability Mechanism. The CRO will also inform the complainant that they may change their choice, i.e., the problem-solving or the compliance review function.
3. **Determining Eligibility:** The SPF or the CRP will determine the eligibility of the complaint. For the problem-solving function, the SPF will determine eligibility within 15 working days. As for the compliance review function, the CRP will confirm the complaint mandate within 5 days of receiving the complaint from the CRO.
4. **Management Response (for Compliance Review):** If the complaint is eligible for compliance review, the CRP will forward it to the Management and request a response within 21 days. The Management must provide evidence of ADB's compliance with its policies or indicate its intention to take remedial action in case of non-compliance.
5. **The CRP's Draft Report (for Compliance Review):** Upon the completion of the compliance review, the CRP will issue a draft report of its findings to the complainant, the borrower, and the Management for comments and feedbacks within 45 days.
6. **The CRP's Final Report (for Compliance Review):** The CRP will consider the feedbacks and issue a final report, which will be submitted to the Executive Director within 7 days after consideration by the Board of Directors.
7. **Board Decision (for Compliance Review):** The Board of Directors will consider the CRP's final report.

8. **The Management's Remedial Action (for Compliance Review):** If the CRP's report concludes that a non-compliance caused harm, the Management will propose remedial action.
9. **The Board's Decision (for Compliance Review):** The Board will make a decision regarding the proposed remedial actions.
10. **Monitoring and Conclusions (for Compliance Review):** The CRP will monitor the implementation of the remedial actions and prepare an annual monitoring report

A complaint may be waived if:

- i. it is not related to the ADB's actions nor negligence;
- ii. the complainant has not attempted to resolve the issue with the relevant operations department;
- iii. the issue has already been considered by the SPF (unless there is new available evidence);
- iv. two years have passed since the closing date of the project loan or grant;
- v. it is frivolous, malicious, or intended for competitive advantage; or
- vi. it concerns a decision made by the ADB, the borrower, or other parties that does not constitute a violation of the ADB's operational policies. Specifically for compliance review, a complaint will also be waived if it does not involve non-compliance by the ADB with its operational policies.

#### Rights of the Impacted Communities and Their Supporting Organizations

- **Right to File a Complaint:** Individuals impacted by a project have the right to voice their concerns and seek solutions to their problems, as well as to request a compliance review of alleged non-compliance committed by the ADB.
- **Direct Access:** Complainants have direct access to either the problem-solving or the compliance review function without being required to go through either function first.
- **Confidentiality:** Identitas pengadu dan informasi sensitif dijaga kerahasiaannya oleh CRO, OSPF, atau OCRP, terutama jika diminta oleh pengadu. Informasi yang diserahkan secara rahasia tidak akan dirilis kepada pihak lain tanpa persetujuan pihak yang menyerahkan.
- **Participation:** The identity of the complainant and sensitive information are kept confidential by the CRO, OSPF, or OCRP, especially

upon request by the complainant. Confidentially submitted information will not be disclosed to any other party without the consent of the submitting party.

- Supporting Organizations: Non-Governmental Civil Society Organizations can provide support and assist complainants in submitting their complaints to the CRP for investigation.

### **3.3 Chronology of Using the Accountability Mechanism in the PLTGU Jawa-I Case**

The fishers' decision to use the ADB accountability mechanism stemmed from the lack of effort and good faith from the ADB's PSOD. For more than a year, they had been communicating their requests for an independent reassessment, yet the process did not move forward, no progress, and even no communication about the causes and obstacles. This situation exacerbated their frustrations because they had previously been promised an independent reassessment.

Throughout 2024 until February 2025, the KPPII also held several online meetings with the ADB Executive Directors from countries influencing the bank management. The meeting discussed the environmental and social issues arising from the construction of the PLTGU Jawa-I project. The KPPII also expressed their complaint that the PSOD allegedly halt the independent reassessment effort, despite having developed a term of reference and presented it to the KPPII.

During a regular KPPII meeting in late February 2025, the fishers group from Muara Village requested to send another letter to the ADB reiterating their concern and complaint that the promise of an independent reassessment still remains unfulfilled. However, the KPPII suggested another approach: to file their complaint using the ADB's accountability mechanism. The KPPII also elaborated what an accountability mechanism is to the fishers.

Following up, in March 2025, the KPPII contacted the OSPF via email, requesting an online meeting. The proposed agenda was to ask them for assistance in addressing the issues faced by the fishers and locals. The OSPF was already familiar with the issues faced by the communities impacted by

the PLTGU Jawa-1 project, as KPPII had previously explained them during their visit to the ADB office in Manila.

The OSPF responded to the KPPII email, and an online meeting was held in March 2025. During that meeting, the KPPII re-explained the situation. Although the OSPF was already familiar with the case, the KPPII reiterated as well as explained the updates. The main point of the online meeting was the KPPII urged the OSPF to conduct a field visit mission to Cilamaya.

The OSPF's response was neither immediate acceptance nor rejection. They explained that there were procedures to follow, i.e., the accountability mechanism that is part of the ADB policy. It was further explained that impacted communities or the KPPII must first file a complaint. If the fishers nor the impacted communities are unable to file and submit their complaint, their supporting organization could represent them. It was then agreed that the fishers would provide a special authorization letter to the Indonesian Legal Resource Center (ILRC), considering that the organization serves as the KPPII secretariat and is a legally registered organization.

After receiving the complaint form, a few days later the KPPII visited the fishers of Muara Village to explain the outcomes of the online meeting with the OSPF team. The KPPII could assist them in filling out the complaint form and even represent them on the form should they refuse to have their names listed. Eventually, two fishers agreed to put their names on behalf of their entire groups. The KPPII team read each question in the complaint form and even translated them for the fishers to answer. The KPPII team then helped write down all their answers.

After all the sections were filled, the two representatives of the fishers as well as the KPPII signed the complaint form. The fishers were also informed that the form would still be reviewed by the OSPF. If deemed eligible, the OSPF team would later conduct a field visit mission. At the end of March, the complaint form and authorization letter were then emailed to the complaint receiving department.

Shortly thereafter, on the same day, the complaint receiving team responded to the KPPII email, confirming receipt of all documents and

asking whether the requested function was the problem-solving or another function. The email also elaborated that the fishers and the KPPII were given 21 days to review and determine which function to use. The KPPII then contacted one of the fishers' representatives by phone regarding this, and it was agreed that they chose the problem-solving function. This decision was then forwarded by email by the KPPII to the complaint receiving team.

In early April 2025, the Complaint Receiving Officer (CRO) notified via email that the complaint had been forwarded to the OSPF team. They also noted that forwarding the letter to the OSPF did not necessarily mean the complaint was deemed eligible. The OSPF team itself would later contact the sender, in this case, the KPPII.

Just a few hours later, the OSPF team sent an email notifying the KPPII that they had received the forwarded complaint. The letter had been received and would be recorded in their complaint registry. In early May 2025, the OSPF team notified them that the complaint had been deemed eligible. An online meeting was then scheduled to discuss the timeline, agenda, and technical details of the field visit mission.

#### Initial Mission to Collect Information and Facts

In May 2025, the KPPII team began a series of preparations in the Cilamaya and Subang areas ahead of the OSPF team's visit. The main objective of this activity was to facilitate meetings between the OSPF team and the communities impacted by the presence and the operations of the PLTGU Jawa-I, both those living near the power plant and the coastal fishing communities.

When the OSPF team arrived, they were invited to conduct a field survey in Karanganyar Sub-Village where they listened to various complaints from the locals (four men and four women). The locals explained that the booming noises from within the power plant area, which occurred four to five times a month, made them, especially the elderly and children, feel anxious and uncomfortable. Several houses had cracks in their walls, and although the company had repaired them, the quality was considered poor. They also complained that groundwater was scarce, and it was their

only source of water. Meanwhile, former farmland workers stated that the company's livelihood restoration program was deemed imposed and did not take their aspirations into account. The villagers now rely solely on making satay sticks after their rice fields were transferred to the PLTGU Jawa-1. Complaints were also raised regarding the worker recruitment process, which did not prioritize the locals and required registration fees.

On the second day, the OSPF team continued their visit to the fishing community in Muara Village where around 30 fishers attended the meeting. The OSPF team listened to various complaints, ranging from the fishing groups being divided due to their differing stances toward the company, to perceived economic losses. The fishers also complained about rapid sedimentation caused by the undersea gas pipeline, increasing water turbidity due to intake pipeline cleaning activities, nets frequently getting caught on the pipelines, and piles of construction rock left in the sea. As a result, their operational costs increased because they had to fish farther from their previous fishing grounds. They also criticized the livelihood restoration program implemented by a third party, which was non-transparent and under the control of certain individuals for their personal gain. Meanwhile, fishers who disagreed with the program felt neglected.

The following day, the OSPF team met with 26 male fishers in Blanakan Village. The meeting took place at their Cooperative office (KUD). The fishers stated that, to date, they had not yet experienced any positive impact from the PLTGU Jawa-1. Rather, what they experienced were, among others, increasingly restricted fishing zones and accidents because their boats collided with unmarked buoys. They also expressed their wishes, such as to get small-scale business trainings for seafood processing, both for male and female fishers. Damaged nets caught on the pipeline were also a major issue, directly impacting their productivity and income. The OSPF team concluded their visit by presenting a summary of their findings to the locals and fishers. The team stated that they would prepare a final report and propose possible solutions within two weeks after the visit. The activities ended in the afternoon, marking the completion of the field surveys and dialogues.

The OSPF team began each dialogue session by explaining the back-

ground and summary of the accountability mechanism procedures. This explanation was also provided in printed form in Indonesian and distributed to the locals

In general, the OSPF team explained the following:

### **Complaint Regarding the PLTGU Jawa-I**

#### **1. Independence and Neutrality of the OSPF**

The OSPF is an independent and neutral body under the ADB that facilitates the resolution of complaints in a collaborative and fair manner, without taking sides with the complainant, the borrower, nor the project team. Its main focus is to foster dialogue and find mutually acceptable solutions.

#### **2. Voluntary Process**

Participation in the OSPF process is entirely voluntary. It proceeds only if all parties are willing to engage in dialogue. The OSPF provides a safe space for communication if all parties agree to it.

#### **3. Determination of Eligibility**

The complaint being determined eligible in May 2025 means the complaint meets the formal requirements under the ADB policy; it does not necessarily mean the allegations are justified. It simply indicates that there is a basis to proceed with the facilitation process.

#### **4. Principle of Confidentiality**

Confidentiality is a key principle of the OSPF process, ensuring open and secure discussions without the risk of misuse in public nor legal setting. All information and documents may not be used outside this process without permission.

#### **5. Initial Review & Assessment Mission (May 2025)**

After the complaint was deemed eligible, the OSPF conducts an initial mission to collect information, clarify the issues, and assess the parties' willingness to engage. This mission was not intended to determine fault, but rather to establish a basis for dialogue. A decision on whether to proceed with facilitation would be made after this stage.

In August 2025, the KPPII received information from a reliable source that the JSP company was concerned that the results of the independent reassessment, if conducted, might be used by the fishers to file a lawsuit against them in court. Therefore, this problem-solving process could take quite some time. At the time of preparing this report, the accountability mechanism was still ongoing.

## 4. LESSONS LEARNED

Photo 6: The PLTGU Jawa-I at Night



Photo by: Iqbal Kusumadirezza

The limited experience of the locals impacted by the PLTGU Jawa-I project in using the ADB accountability mechanism shows that it serves as an official and independent channel for the public to voice their complaints regarding the ADB-financed projects. It allows them to access an international institution directly, without having to go through the government nor the project-implementing company first. It is designed to protect the identity of the complainants, provide a participatory space, and promote non-confrontational problem-solving through dialogues. One of its main strengths is the OSPF's commitment to conducting field visit missions and engaging directly in dialogues with the impacted communities, including vulnerable groups such as fishers and women, who rarely had the opportunities to participate in previous project consultation processes.

However, in using this mechanism, there are several limitations, i.e.:

- a. A slow and bureaucratic process, with long lags between the complaints and the follow-ups;
- b. Dependence on the goodwill of the internal ADB units such as the PSOD and the willingness of the project company to engage in dialogues often hamper the locals' efforts.
- c. The absence of any legally-binding obligation for the company nor the ADB to follow up on the facilitation outcomes makes the process prone to stagnation without clear results.
- d. Language, information, and technical skills gaps between the community and the project pose additional challenges, making the role of supporting organizations essential in bridging the process.

Based on this experience, other communities wishing to use similar mechanisms need to prepare a well-developed and collaborative strategies. It is important for the impacted communities to systematically document project impacts from the outset and strengthen their position with supports from CSOs that understand the governance of international financial institutions. In addition, a diplomatic approach to donor countries and the ADB policymakers can also help open broader avenues for dialogues. Despite its lengthy process, using the ADB accountability mechanism can serve as an important means to assert the rights of communities marginalized by large-scale development projects.

## REFERENSI

- Asian Development Bank (2012). Accountability Mechanism Policy 2012. Accessed from <https://www.adb.org/sites/default/files/institutional-document/328211/accountability-mechanism-policy-2012.pdf>
- Asian Development Bank (2018). Proposed Loan and Administration of Loan PT. Jawa Satu Power Jawa-I Liquefied Natural Gas-to-Power Project (Indonesia). Accessed from <https://www.adb.org/sites/default/files/project-documents/51112/51112-001-rrp-en.pdf>
- The Indonesian Coalition for Monitoring Infrastructure Development (KPPII) (2023). Petisi Nelayan Muara, 21 August 2023.
- The Indonesian Coalition for Monitoring Infrastructure Development (KPPII) (2023). Dokumen Arahan KPPII kepada ADB: Konsekuensi yang Tidak Diinginkan dari Proyek Gas ke Listrik Jawa I yang Didanai ADB, September 2023.
- The Indonesian Coalition for Monitoring Infrastructure Development (KPPII) (2024). Surat Pernyataan dan Tuntutan Nelayan ke ADB, 25 June 2024.
- Indonesia (2015). Rencana Usaha Penyediaan Tenaga Listrik (RUPTL) PT PLN (PERSERO) 2015 – 2024. Accessed from [gatrik.esdm.go.id/assets/uploads/download\\_index/files/87b45-ruptl-pln-2015-2024.pdf](http://gatrik.esdm.go.id/assets/uploads/download_index/files/87b45-ruptl-pln-2015-2024.pdf)
- Indonesia (2017). Peraturan Presiden Republik Indonesia Nomor 22 Tahun 2017 Tentang Rencana Umum Energi Nasional. Accessed from [esdm.go.id/assets/media/content/content-rencana-umum-energi-nasional-ruen.pdf](http://esdm.go.id/assets/media/content/content-rencana-umum-energi-nasional-ruen.pdf)
- Indonesia (2016). Peraturan Presiden (Perpres) Nomor 4 Tahun 2016 tentang Percepatan Pembangunan Infrastruktur Ketenagalistrikan. Accessed from PERPRES No. 4 Tahun 2016

## Appendix

- Appendix 1: Petition: PT JSP's PLTGU Jawa-I Neglects Fishers. The ADB Must Conduct an Independent Reassessment
- Attachment 2 : Letter of Statement and Demand to the ADB: Neglecting the Fate and the Future of Muara Village's Fishers

# PETISI

## PETITION

### PT JSP'S PLTGU JAWA-1 NEGLECTS FISHERS THE ADB MUST CONDUCT AN INDEPENDENT REASSESSMENT.

We, the undersigned, are fishers from Muara Village, Cilamaya Wetan District, Karawang Regency, West Java who live in four sub-villages: Krajan 1, Krajan 2, Tanah Timbul, and Timbun Jaya.

We wish to take this opportunity to convey our demands and issues that we have been facing since the establishment of the PLTGU Jawa-1. These issues are closely related to our future and the marine environment. We believe that the presence of the PLTGU Jawa-1 has only brought negative impacts on our livelihoods. We also believe that our fishing grounds have been increasingly narrower, as they have been taken over by the PLTGU. There is no longer freedom to fish because fishing grounds are filled with warning buoys. We the fishers are constantly fearful of accidents.

We also strongly condemn the highly inaccurate report submitted by the JSP company to the ADB. We were informed that, according to the report, the livelihood restoration program would only be provided to 56 fisher households. However, to date, there are hundreds of fisher households in Muara Village that have been suffering from negative impacts since the construction of the PLTGU Jawa-1.

We urge the ADB, as the lender for the development of PLTGU Jawa-1, to share responsibility and take swift action to improve and restore our livelihoods and marine environment.

For your information, below are several facts that we, the fishers of Muara Village and the surrounding areas, have been experiencing as the impacts of the PLTGU Jawa-1:

1. The fishers of Muara Village were never invited by the ADB nor its clients to participate in any meaningful public consultation before and during the implementation of the PLTGU Jawa-1 project.
2. The installation of the PLTGU Jawa-1 pipelines in the fishing grounds has caused significant negative impacts on our safety and has caused accidents.
3. The installation process of the PLTGU Jawa-1 pipelines has damaged our fishing grounds, decreasing our income. Our fuel costs have also increased because we have to take longer detours to avoid the pipelines. Consequently, to meet our family daily needs, our wives have to go into debts.
4. The fishing grounds have been shallower due to sediment disposals during the installation of the PLTGU Jawa-1 undersea pipelines.
5. The quality of seawater in Cilamaya Bay, also our fishing ground, has deteriorated due to the installation process of the PLTGU Jawa-1 gas pipelines
6. There has been no adequate compensation for accidents involving our fishing boats due to collision with the pipelines in our fishing grounds.
7. We were not informed about any complaint mechanism to address the impacts caused by the construction of the PLTGU Jawa-1.
8. We, the project-impacted fishers from Muara and Blanakan Villages, demand that the ADB re-assess the impacts of the PLTGU Jawa-1 on coastal fishing activities, involving independent experts

Therefore, we demand the ADB to immediately conduct an independent reassessment focusing on (a) seawater quality/pollution, and (b) livelihood restoration.

To re-affirm this petition, we attach the signatures of the fishers who collectively support these requests and demands.

## **Attachment 2: Letter of Statement and Demand to the ADB: Neglecting the Fate and the Future of Muara Village's Fishers**

### **LETTER OF STATEMENT AND DEMAND**

The ADB Neglects the Fate and the Future of Muara Village's Fishers

**To:**

**The Executive Director of ADB**

We, the undersigned, are the representatives of the fishers from Muara Village, Cilamaya Wetan District, Karawang Regency, West Java, who live in four sub-villages (Krajan 1, Krajan 2, Tanah Timbul, and Timbul Jaya) and the representatives of the fishers from Cilamaya Girang Village, Blanakan District, Subang Regency, who live in two sub-villages (Muara Lama and Muara Baru).

This is our second letter, as our first letter has never received a concrete response from the ADB. In the first letter, we stated that the PLTGU Jawa- I has made us the fishers even more miserable. The PLTGU Jawa- I has restricted our fishing grounds, preventing us from fishing freely. Our income from fishing has dropped significantly. To prove this, in August 2023, we had requested the ADB to conduct a reassessment by an independent team. However, as of this writing, the ADB has never responded to our request.

For your information, the Jawa Satu Power (JSP) company has implemented a livelihood restoration program through a third party hired by JSP, i.e., an organization called PUPUK. The program has been running since August 2023. At that time, the PUPUK team conducted data collection and interviews with the fisher community in Muara Village, encouraging us to participate in the program. We have actually rejected the program. Most of us disagree with it because we believe it is burdensome, forced, and ever-shifting, from compost production and mushroom cultivation to finally sheep fattening.

In November 2023, the PUPUK and JSP teams held an outreach activity on the livelihood restoration program at Muara Village office. Around 10 people from the fisher community in Muara Village were invited. During the activity, the 50 attendees were offered the program to increase their income.



On Wednesday, 1st May 2024, still at Muara Village office, the JSP and PUPUK held a Focus Group Discussion (FGD), inviting the impacted fisher communities from the Village who agreed to join in the sheep fattening livelihood restoration program. During the activity, the JSP and PUPUK aimed to ascertain the locals' understanding of the program's implementation.

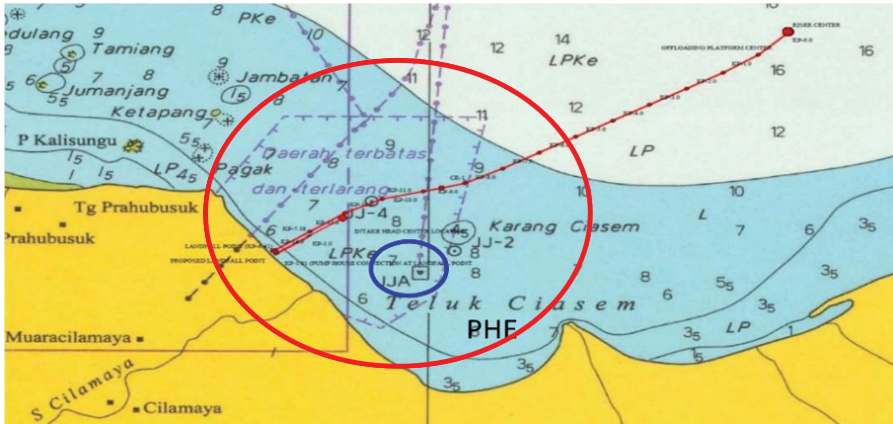
The sheep are distributed over one week. The technical aspects of the sheep fattening program implemented by the JSP and PUPUK are as follows:

- The PUPUK and JSP teams initially distributed young sheep to four groups of 42 people. These groups received 32 sheep.
- All young sheep are then collectively raised in a shared pen provided by the PUPUK/JSP teams.
- Once mature, the sheep will be purchased by the PUPUK team.
- The groups' income or profit from selling the mature sheep must be used by the group to buy more young sheep to raise, which again will be provided by the PUPUK team. In other words, using the profit from selling their previous sheep, the groups have to buy young sheep from the PUPUK team

According to information we received, one of the groups eventually

rejected the program, objecting the rules imposed by the PUPUK team, as previously explained.

In addition, we wish to inform you that the enforcement of a restricted zone in our fishing grounds has further reduced our income as fishers. It is imposed by the JSP company, claiming that they are the gas pipeline areas. See the map below for the restricted zones.



The restricted zone is marked by dashed lines within the red circle

Another complaint we have is that the JSP's sediment dredging activities have made the seawater increasingly turbid, preventing fish from settling in. Fish are becoming scarce because the seawater is too turbid, making it increasingly difficult for us the fishers to catch fish. Our income has significantly dropped, even losses because we do not get any fish while we have already spent money for our boats' fuel cost.

We are deeply disappointed by the ADB's inaction. We believe the ADB deliberately refuses to conduct an independent reassessment. However, we continue to:

1. Demand the ADB to conduct an independent reassessment of the impacts on livelihoods and initiate immediate restoration in July or August 2024;
2. Request that independent experts are not affiliated with the Government of Indonesian or the Jawa Satu Power (JSP) company;
3. Request that the independent reassessment to be conducted by experts

proposed by our supporting organizations, i.e., the KPPII and Just Finance International (JFI); and

4. Reject the goat livelihood restoration program implemented by the JSP and PUPUK, as it only imposes additional burdens rather than benefits.

For generations, our profession is fishing, not goat farming

This letter of statement and demand is submitted with the signatures of the representatives of the fishers from four sub-villages in Muara Village, Cilamaya District, Karawang Regency, and the representatives of the fishers from two sub-villages in Cilamaya Girang Village, Blanakan District, Subang Regency, West Java..

**The Indonesian Coalition for Monitoring Infrastructure Development (KPPII)** is an open coalition of civil society organizations and individuals from regional, national, and international levels. We work with impacted communities to advocate for the impacts of infrastructure developments in Indonesia financed by loans from international financial institutions (Multilateral Development Banks–MDBs)..

**The KPPII is currently consisting of :**

- The Alliance for Mandalika Community Solidarity (ASLI Mandalika)
- The Alliance for Agrarian Reform Movement (AGRA)
- National Student Front (FMN) Mataram
- Indonesian Legal Resource Center (ILRC)
- The Institute of Legal Studies and Aid (LSBH) West Nusa Tenggara
- Legal Aid Institute–Indonesian Legal Aid Foundation (LBH-YLBHI) Mataram
- The Center for Development and Community Welfare Studies (PUSAKATA)
- Rhizoma
- The Indonesian Forum for the Environment (WALHI) South Sulawesi