

Comments on the Revised Draft of the World Bank's Disclosure Policy

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Submitted by

Japan Center for a Sustainable Environment and Society (JACSES)

Revision Process

1. **No Response from the Bank:** There is no response from the Bank to stakeholders' comments on the Approach Paper, so that stakeholders have not understood rationales why their comments have not been reflected in the Revised Paper. The Bank's response to stakeholders' comments on the Approach Paper should be made available.

Disclosure of Specific Documents

2. **Scope of Exception:** The scopes of exceptions on Para. 9 (a) and (b) in Annex C about deliberative information are vague. These exceptions should be limited for explicit cases, which would or would be likely to compromise the integrity of the deliberative and decision making process if disclosed. ADB adopts the narrower scopes of exceptions in the Public Communication Policy.
3. **Transcripts of Board Discussion:** The Bank is an international institution using public money, and the Bank should be accountable to the public. Therefore, essentially, verbatim transcripts of Board meetings should be made available to the public after the Board meetings. There would be several cases which Board discussions cannot be disclosed. If there is information which needs to be confidential in a transcript, it should be disclosed after elimination of the information.
4. **Documents under Technical Assistance:** Feasibility study report, master plan and other documents under Bank's technical assistance should be made available to the public. It is a vital opportunity for stakeholders to provide comments on the analysis included in these documents. For reference, Japan International Cooperation Agency (JICA) discloses all reports under JICA's technical assistance.
5. **Environmental Monitoring (progress) Report:** The Bank fails to include social and environmental monitoring (progress) report¹ in the Positive List (Annex B). Social and environmental monitoring (progress) report is vital document, from which stakeholders understand the adequacy of project implementation. For reference, ADB discloses the monitoring report under the PCP. Therefore, the Bank should also disclose social and environmental monitoring (progress) report, as soon as the Bank receives the document.
6. **Aide Memoire:** In order to ensure the informed participation of affected people in implementation stage of the Bank funded project, it is crucial to disclose information on ongoing issues and the

¹ It is not clear the name of the report in World Bank. The report is periodically provided by borrowing countries during project implementation. The report includes information on statuses and levels of social and environmental impacts in the project implementation.

Bank's position in Aide Memoire. Therefore, Aide Memoire should be included in the Annex B as a publicly available document.

Implementation Framework

7. **Partial Disclosure:** If there is a part which cannot be disclosed in a document and such information can be eliminated, the Bank should disclose the rest of the document, after excluding the confidential information. The partial disclosure rule should be adopted in the new Policy.

Contact

Yuki TANABE

Japan Center for a Sustainable Environment and Society (JACSES)

401 Sanshin Bldg. 2-3-2 Iidabashi Chiyoda-ku Tokyo 102-0072 Japan

Tel: +81-3-3556-7325 Fax: +81-3-3556-7328

Email: tanabe@jacses.org URL: <http://www.jacses.org/>