

April 5, 2004

Ms. Suellen Lazarus  
Senior Advisor to the Vice-President of Operations  
International Finance Corporation (IFC)  
2121 Pennsylvania Avenue  
Washington, DC 20433

## **Re: Recommendations for IFC's Disclosure Policy Review Process**

Dear Ms. Lazarus,

We, as non-governmental organizations working for social justice and ecological sustainability, are encouraged that the International Finance Corporation (IFC) will review its transparency requirements. However, we would like to take this opportunity to express our concerns with respect to the disclosure policy review process which is posted for public comment on the IFC's website.

We believe that the IFC should strengthen its transparency for the following reasons:

- As a public institution, supported by funds from member governments, the IFC has a responsibility to be accountable to the public.
- Citizens have a right to understand and participate in the decisions that affect their lives.
- Informed participation from affected people can avoid/minimize environmental and social impacts of projects supported by the IFC.

Therefore, we request that the IFC reach out to a broad set of stakeholders regarding the detailed proposals for the disclosure policy review. To help ensure meaningful participation in the policy review, we urge you to take the following actions:

### **Position Paper on IFC Transparency**

- The position paper, which will be the basis for consultations, should be disclosed at least 45 days prior to the first consultation in order to give those participating in face-to-face meetings adequate time to consider the paper and formulate input.
- In order to facilitate informed consultations, the position paper should include a list of all types of documents developed during project identification, preparation, appraisal and

implementation and should state whether or not such documents are currently disclosed. For confidential documents, this list should provide concrete reasons why documents can not be disclosed.

- The IFC has been accepting comments on its current disclosure policy in order to inform the development of the position paper. However, these comments have not yet been disclosed. The IFC should post on its website the comments it has already received and should provide an explanation on how these comments are incorporated into the position paper.

### **Consultations**

- The IFC should disclose a detailed consultation schedule including the cities and dates of planned face-to-face consultations. This schedule should be disclosed in draft form for public comment for at least 30 days prior to the beginning of consultation.
- Consultations should be held in at least 10 countries (ADB disclosure policy consultations will be held in 7 borrowing countries and 5 donor countries).
- Consultations should be accessible for affected people. In particular, the IFC should translate the position paper into the language(s) of the people participating in the consultation and provide a system for interpretation at each consultation.
- In order to better ensure that the consultations are a learning experience for IFC staff, at least one staff person from IFC's headquarters from investment operations should participate at each consultation. In addition, for consultations in borrowing countries, at least one staff person from the residence office in charge of investment operations should participate at each consultation.

### **Public Comment on Draft and Final Draft Policy**

- The IFC is proposing a 30 day commenting period on the draft policy. However, this period does not provide adequate time for civil society to prepare thoughtful and meaningful comments on the actual draft language of the policy. The IFC should provide at least 60 days for the public to consider and develop comments on the draft disclosure policy.
- The IFC's proposed review process does not include the disclosure of the final draft policy – the version of the policy that is sent to the Board for approval. The final draft should be available to the public at the same time it is circulated to the Board.

### **Announcement of the Review Process**

- The IFC should make extensive announcements about the review. The announcement

should be posted on the home page of the IFC's web site (<http://www.ifc.org/>); should be circulated on civil society email lists; and, should be announced in national and local newspapers and radio broadcasts, especially in those areas where consultations will take place.

- The IFC should specify the contact person in charge of the review process on the IFC's web site.

Thank you for this opportunity to comment on the disclosure policy review process. We look forward to your response and any questions you may have regarding our recommendations.

Sincerely,

Endorsed by:

Asim Nawaz Khan, UmeedeNoo Citizen Community Board, Pakistan

Bruce Rich, Environmental Defense, U.S.

Bruno Gurtner, Swiss Coalition of Development Organizations, Switzerland

Charmaine Rodrigues, Commonwealth Human Rights Initiative, India

Christine Eberlein, Erklarung Von Bern, Switzerland

Henneke Brink, Both Ends, Netherlands

Himanshu Thakkar, South Asia Network on Dams, Rivers & People, India

Ian Baird, Global Association for People and the Environment, Canada

Ikuko Matsumoto, Friends of the Earth Japan, Japan

Jennifer Kalafut, Bank Information Center (BIC), U.S.

John Fitzgerald, Government Accountability Project, U.S.

Joh Sohn, Friends of the Earth, U.S.

Khawar Mumtaz, Shirkat Gah-Women's Resource Centre, Pakistan

Kenji Fukuda, Mekong Watch, Japan

Magda Stoczkiwicz, CEE Bankwatch Network Netherlands

Muhammad Nauman, CREED, Pakistan

Naeem Iqbal, Pakistan Network for Rivers Dams and People, Pakistan.

Naing Htoo, EarthRights International, Thailand

Peter Bosshard, International Rivers Network, U.S.

Peter Mihok, Center for Environmental Public Advocacy, Slovak Republic

Pravin Mote, Samata, India

Rana Riaz Saeed, Development Advocates and Lobbyists, Pakistan

Richard Harkinson, Minewatch, U.K.

Yoshihito Miyakoshi, A SEED JAPAN, Japan

Yuki Tanabe, Japan Center for a Sustainable Environment and Society (JACSES), Japan

Zakir Kibria, BanglaPraxis, Bangladesh

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CC: Ms. Rachel Kyte, Director, Environment and Social Development Department