



Bank Information Center

**A Guide to ADB Transparency:
Key Questions for the Ongoing Review
2003 – 2004**

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Introduction

In the coming months there may be an opportunity to fundamentally change the transparency of the Asian Development Bank (ADB). In order to take advantage of this opportunity, interested organizations and concerned citizens will need to tell the ADB and government officials what they think about the state of transparency at the ADB.

- Does the ADB provide enough information on the projects it is funding and does it provide the information at the right time and in the right way?
- How could the ADB do a better job of ensuring that the public can access information about Bank operations and policies?

These and other questions related to ADB transparency are now under review. Between **August 15 and November 14, 2003**, the public is invited to comment on any dimension of transparency at the ADB. Based on these comments, the Bank will draft a new Policy and hold a series of face-to-face consultations in early-2004.

The Bank Information Center (BIC), an independent non-governmental organization that is not affiliated with the ADB, has prepared this “Guide” to help interested individuals and organizations better understand transparency at the ADB. The Guide examines access to information at the Bank from a variety of perspectives and poses questions that citizens may want to consider while preparing comments of their own.

BIC believes that citizens have a right to information about the projects and policies that affect their lives and that public institutions like the ADB have largely failed in their responsibility to be open and transparent in their dealings with the public. We hope this Guide will help inform the review process and encourage people to share their own perspectives directly with the ADB and its member governments. We acknowledge that there are many ways to examine the “transparency” of public institutions and that this Guide raises only a limited number of questions. We hope that citizens who have experience requesting information from the ADB will share those experiences with the Bank in the coming months. A simple message explaining your frustrations and telling your story would be an invaluable contribution. For those who also want to consider other dimensions of ADB transparency, we hope this Guide helps identify a few of the key questions. We welcome your feedback on the Guide and we look forward to learning more about these issues from individuals and organizations throughout Asia.

Please note that the deadline for comments is November 14. For information on the details of the ADB’s Transparency Review see Appendix I of this report. If you have any questions, or would like to know more about ongoing activities surrounding the Review, contact Jen Kalafut (jkalafut@bicusa.org) or Mishka Zaman (mzaman@bicusa.org) at BIC or visit www.bicusa.org.

The Scope of the ADB’s Transparency Review

Although the ADB’s review is primarily focused on revising the Bank’s Disclosure Policy, people are invited to comment on any aspect of transparency that they think is important. Since the review will consider not only what information is disclosed but also *how* that information is made available to the public, we are referring to the process as a “Transparency Review” rather than a “Disclosure Policy Review”. You should feel free to share any experiences or opinions you have in any form that you think is appropriate. Written comments should be sent to:

Office of External Relations
Asian Development Bank
PO Box 789
Metro Manila 0980, Philippines
Fax: +632 636 2648
Email: disclosure@adb.org

About this Guide

This Guide is organized into nine sections. Each section examines a different dimension of ADB transparency and poses a number of questions that citizens and civil society organizations may want to consider when preparing comments of their own. The nine sections are:

- I. The Board of Executive Directors: *What information should the ADB disclose about its most important governing body?*
- II. The Policy and Strategy Formulation Process: *What information should be disclosed during the development of a policy or strategy?*
- III. Country Specific Strategies: *What information should be available about the ADB’s “Master Plan” for your country?*
- IV. The Project Lending Cycle: *What type of information should be available at which points in the project cycle?*
- V. Private Sector Lending: *Should the ADB disclose less information about its lending to private companies than it does about its lending to governments?*
- VI. Lending to Financial Intermediaries: *When the ADB lends money to another bank rather than directly to a project, should those banks have to report on what they do with the money?*
- VII. Accessibility of Information: *What steps should the ADB take to make sure that the public can easily access the information that it discloses?*
- VIII. Translation: *What information should be translated and who makes that decision?*
- IX. Disclosure Policy Compliance and Process Guarantees: *Should citizens be able to appeal cases where they feel that they have been wrongly denied information?*

I. The Board of Executive Directors

On a day-to-day basis, the ADB is governed by a Board of Directors. The Board is responsible for approving all Bank policies, strategies, operations and projects. It is made up of twelve Executive Directors who are elected by, and collectively represent, the ADB's 61 member countries.¹ Eight of these twelve Directors represent countries from the Asia and Pacific region, and the remaining four represent countries from outside of the region.² If you are a citizen of one of the ADB's 61 member countries, there is an Executive Director who represents your country on the Board.

The ADB's Board of Directors operates in almost complete secrecy. The ADB does not disclose the Board's work-plan or the agenda of Board meetings. Transcripts and summaries of Board meetings are kept secret. Information on how various Board members vote on policies and projects, along with any official statements made by Board members, are kept confidential. Furthermore, the documents the Board uses to make decisions, such as final drafts of proposed projects or country strategies, are only disclosed after Board approval, if at all.³

Individuals and organizations may want to consider the following questions:

- Should citizens be able to access information about how they are represented by their country's Executive Director on the Board? If so, what kinds of information and when?
- Should legislative branches and provincial governments be able to access information about how they are represented by their country's Executive Director on the Board? If so, what kinds of information and when?
- Individual governments instruct their Executive Directors to promote specific positions at the ADB. For instance, a government might request that their representative vote in a particular way on a controversial project or adopt a particular position in relation to a policy that is being developed or is under review. Should governments disclose information on the instructions that they are providing to their Executive Director on the Board? If so, what kinds of information and when?
- Should citizens be able to access comprehensive information about Board meetings, such as transcripts, summaries or live webcasts?

II. The Policy and Strategy Formulation Process

Over the years, the Board of Directors has approved a wide array of policies, guidelines and strategies. These policies and strategies dictate how the ADB functions and describe the institution's overarching objectives, priorities and goals.

ADB policies can cover specific topics such as Information Disclosure or Resettlement, or can be sector specific such as the Forestry or Education Policy. The ADB also has a range of

¹ The ADB currently has 61 member countries, 44 from the Asia and Pacific Region and 17 from outside of the region. For a complete list of member countries, see <http://www.adb.org/About/members.asp>.

² For a complete list of Executive Directors at the ADB, see <http://www.adb.org/BOD/default.asp>.

³ Asian Development Bank. *Operations Manual Section 52: Confidentiality and Disclosure of Information*, March 27, 2003: paragraph 17.

strategies, such as the Private Sector Development strategy and the strategy on Microfinance Development.⁴

The ADB's current Disclosure Policy allows for the disclosure of all "public sector policy papers, once approved by the Board of Directors."⁵ However, there is no requirement for Bank staff to release these policies or strategies in draft form for comment, although in certain cases this has been done.

Individuals and organizations may want to consider the following questions:

- Should the ADB disclose a schedule of the policies and strategies that it intends to review or develop in the coming years?
- Should Bank staff be required to make *all* policies and strategies available in draft form for public comment? If so, how long should these policies and strategies be available for comment before they become the "final drafts" that are presented to the Board?
- Which Bank policies and strategies should be reviewed or developed using face-to-face consultations with stakeholders?
- Typically, a policy or strategy progresses through several drafts before it is approved by the Board of Directors. When "final drafts" of policies and strategies (currently called "Restricted Papers") are sent to the Board for approval, should they also be available to the public? If so, how many days before Board approval should they be disclosed?

III. Country Specific Strategies

For every country that borrows from the ADB, the Bank prepares a "master plan" or "country strategy" that is formally called the Country Strategy and Program (CSP).⁶ These CSPs establish the ADB's goals and priorities in a given country. They are based on a series of economic and social analyses as well as dialogue with the borrowing government. CSPs are also supposed to provide a framework for judging the performance of a given country and evaluating the effectiveness of Bank operations. In theory, every project and program financed by the ADB in a given country fits under one of the goals or priorities in the ADB's country strategy. CSPs also feed into regional strategies, which outline the Bank's priorities in a given region.

The CSP is usually prepared once every five years. They are supposed to be prepared with the "active participation through consultation with the government and other stakeholders – civil society, NGOs, the private sector, and other aid agencies."⁷ However, the ADB does not require the disclosure of draft or final draft CSPs, so civil society organizations may not have access to the proposed strategy until after it is finalized and approved. A CSP Update is prepared every year to assess the continued relevance of the CSP, its implementation, and the operational program. In addition, Country Economic Reviews (CER), which contain relevant country economic information and analyses, are prepared every year and used by Bank Management and

⁴ For a list of some of the policies and strategies at the ADB, see <http://www.adb.org/Development/policies.asp>.

⁵ Asian Development Bank. *Policy on Confidentiality and Disclosure of Information*, August 1994: p.25.

⁶ In August 2001, the Bank's Country Operational Strategy Study (COSS) and Country Assistance Plans (CAPs) were replaced by a singled document called the Country Strategy and Program (CSP).

⁷ From the website of the Asian Development Bank, <http://www.adb.org/Documents/CSPs/default.asp>.

the Board when discussing strategies or projects for a given country.⁸ Although both the CSP Update and CER are disclosed as final documents, neither is disclosed in draft form for comment. There is also mention in the ADB’s Disclosure Policy of unspecified “other country papers” that may or may not be disclosed at the discretion of staff.

Individuals and organizations may want to consider the following questions:

- Should the ADB be required to disclose drafts and final drafts of all CSPs?
- In addition to CSPs and CSP Updates, should other country-specific documents and country performance reviews be publicly available?
- What kinds of background documents would be useful for you in understanding how the ADB, with the borrowing government, formulated the Bank’s lending strategy?
- The ADB develops its strategy with the Executive branch of government. Should legislators have access to country strategies before they are finalized and approved by the ADB’s Board? Should legislators in borrowing countries be invited to comment on country strategies?

IV. The Project Cycle

The ADB is essentially a large publicly-owned bank whose principal function is to lend money to governments and private corporations. The procedures for lending money to a given project are broken up into several phases which, when combined, are sometimes called the “project cycle”. The first phase of the cycle is project *identification*. The Bank and the borrower “identify” an idea for a project that falls within the broader strategy that the Bank has developed for the country.⁹ This is followed by the second phase of the cycle, project *preparation*, where the details of the project are elaborated with the borrowing government and background analysis and documentation is prepared. Once this is complete, the ADB carries out a project *appraisal*, which means that ADB staff visit the country and meet with their government counterparts to work out final details, review documentation and prepare the project for final *loan negotiations* and eventual *approval* by the Bank’s Board of Directors. Following Board approval, the *implementation* phase of the project begins, which involves disbursing the loan and implementing the project. Once the project is complete, an *evaluation* mission from the ADB reviews various aspects of the project’s preparation and implementation as well as the outcome of the project in relation to its initial objectives.¹⁰

The ADB does not require the disclosure of any information at the project identification stage. During project preparation, however, the ADB is supposed to release a Project Profile which provides a general overview of the proposed project. The ADB may also conduct a number of environmental and social analyses which are either released in full (such as Environmental Impact Assessments) or summarized and disclosed in the form of an Environmental Summary. Unfortunately, all staff reports on a given project, such as technical assistance reports, feasibility

⁸ Asian Development Bank. *Operations Manual Section 45 – Country Planning and Programming*, 19 November, 1996: paragraph 9.

⁹ For more on country strategies see Section III above.

¹⁰ The ADB’s project cycle is described in the *Asian Development Bank Loan Disbursement Handbook*, January 2001: Section 2.7.

studies, or any other material used in project preparation are kept confidential or are disclosed only at the discretion of Bank staff after consulting with the project sponsor.

Furthermore, the most detailed description of a given project, called the Report and Recommendation of the President (RRP), is not disclosed until after Board approval. In the case of loans to private corporations, even less is made available to the public (see Section V).

The ADB does not require the release of any documentation during project implementation. All project supervision reports completed by the ADB after Board approval but prior to project completion are kept confidential (unless Bank staff make an exception). Only at project completion is some information released. Final staff assessments of a project are disclosed along with Project Performance Audit Reports. These documents are supposed to evaluate the design, implementation and effectiveness of the project.

Individuals and organizations may want to consider the following questions:

- Should the ADB notify the public as soon as a potential project is identified? How should that notification process take place?
- Should the ADB be required to disclose background information, such as feasibility studies and other technical reports related to the preparation of a given project? At what stage should that information be released?
- As a project develops during the preparation, appraisal and negotiation phase, what kind of information should be disclosed? For instance, should the ADB disclose periodic updates that provide additional details on projects prior to approval?
- Should the ADB release a detailed explanation of the project in draft form for public comment?
- Should the ADB disclose the final draft of the project document when it is sent to the Board for approval?
- Should the ADB be required to disclose information during project implementation? If so, what kind of information would be most useful?
- Should the ADB provide more information on the specific objectives of individual projects and then systematically report on the degree to which those objectives are being achieved in practice?
- What should the ADB release at project completion? Should the ADB disclose all staff and management evaluation reports completed by the ADB in addition to any reports conducted by the evaluations unit at the Bank?

V. Private Sector Lending

As noted above, the ADB lends money to both governments and private companies. The project cycle is generally the same for both public and private sector loans, but less information is disclosed about the ADB's loans to the private sector. For example, when the ADB lends money to a private company, it is not required to release a summary of the proposed project, called a Project Profile (PP), until 30 days before the loan is approved by the Board. This is ironic since the Bank's Disclosure Policy states: "The purpose of the PP would be to provide as much information as possible to the public during the earliest stages of project preparation, to ensure adequate debate, dialogue, and participation by parties concerned including affected populations

at the formative stages.”¹¹ In fact, the ADB may not disclose a PP at all if it feels that “disclosure would be harmful to the project company” or that “market conditions or timing requirements” call for the project to be kept secret.¹² In contrast, PPs for loans to governments are sometimes disclosed several months prior to approval.

After the Board approves a private sector project, the ADB is not required to disclose any information. Unlike the ADB’s public sector lending, the Bank is not required to disclose a detailed description of its private sector projects (the Report and Recommendation of the President). Nor is the ADB required to disclose any documentation during project implementation or following project completion.

Individuals and organizations may want to consider the following questions:

- Should the requirements governing the disclosure of private sector documents differ from the disclosure requirements for public sector documents? (Also see the other questions in Section IV: The Project Cycle, which are equally relevant to the ADB’s private sector lending.)
- As a public institution, the ADB has a responsibility to disclose information about its operations. However, in private sector operations they often do not disclose information due to “business confidentiality”. What standards should the ADB use to distinguish between “business confidential” information and information that it has a responsibility to disclose?

VI. Lending to Financial Intermediaries

Sometimes the Asian Development Bank lends money to other banks which then use the money to directly finance other projects. This is called Financial Intermediary lending, since the ADB is lending to an “intermediary” rather than using its money to directly support projects. The Financial Intermediary (FI) that receives the money is usually a private bank that already has operations in a given country but wants additional resources so that it can expand the scope of its own lending.

When the ADB makes a loan to a Financial Intermediary, the money passes through two project cycles. First, the ADB lends the money to the FI. As with the project cycle described above (See Section IV: The Project Cycle), this involves identifying an FI that is seeking additional money, preparing the loan and then having it appraised, approved, implemented and eventually evaluated. Second, the FI will use ADB financing to make a series of loans to third parties, such as companies that borrow directly from the FI. Therefore, the second lending cycle is from the FI to the third party.

As described in Section V, the ADB discloses very little information about its loans to the private sector. This is equally true for its loans to FIs. However, there is practically no information available about the loans that the FIs then make to third parties. That is, there is practically no information available about what the FIs are doing with the money that the ADB lends. Who is the FI lending the money to? What projects are being funded this way? The ADB is not required to answer these questions.

¹¹ Asian Development Bank. *Policy on Confidentiality and Disclosure of Information*, August 1994: p.23.

¹² Asian Development Bank. *Policy on Confidentiality and Disclosure of Information*, August 1994: p.27.

The ADB does usually require the FI to establish a plan for assessing the social and environmental implications of the projects that it will finance, but this social and environmental management plan is not disclosed. Likewise, the ADB requires the FI to provide an annual report on the operations of the FI, but this annual report is not disclosed as well.

Individuals and organizations may want to consider the following questions:

- If the ADB requires the FI to develop an environmental management plan that the FI will apply to its lending activities, should that plan be disclosed?
- Should the FI be required to disclose an annual report on the projects that it is financing with indirect ADB support?
- Should the ADB periodically audit the social and environmental standards and practices of the FI and disclose these audits?
- What other information should be available about the Financial Intermediaries to which the ADB lends?
- What information should be available about the lending operations of Financial Intermediaries?
- What kind of information should FIs make available during their lending process? Should the FI be required to meet disclosure standards similar to those that would be applied for a direct ADB loan to a project?

VII. Accessibility of Information

Transparency depends not only on which types of information are disclosed, but also where and to whom that information is available. The ADB is supposed to provide information to those who request it, but the Bank does not always proactively disseminate information to those who may not know that the information exists or do not know how to request it. Because of this, it is sometimes the population most directly affected by an ADB-funded project that receives the least information.

For the ADB, or for any institution that is supposed to be accountable to the public, transparency encompasses proactive dissemination of information, targeting specific groups, and providing easy access to information through local offices or proactive outreach in communities. Transparency also means ensuring that people affected by projects have the ability to request information or make general inquiries about the Bank's activities.

ADB touches on these issues in several different policy papers, namely the Information Policy and Strategy (1994), the Resident Mission Policy (February 2000), and to some degree, the Disclosure Policy. Although these policies articulate an objective to disseminate information using multi-media mediums,¹³ it is difficult to judge how well the ADB has implemented this

¹³ For example, the ADB states that print media, such as news releases, articles, and institutional advertisements, as well as printed matters, such as annual reports, periodicals, background papers, information brochures and books, will continue to be the primary outlet for information. But, the Bank will gradually increase its emphasis on the electronic media such as video, TV press conferences and one-on-one interviews, and email. Asian Development Bank. *Information Policy and Strategy*, 1994: pp.12-13.

objective to date. The policies state that publicly available Bank documents can be requested from the Resident Missions (in borrowing countries), Representative Offices (in Washington DC, Tokyo, and Frankfurt), or the Publications Unit of the Office of External Relations.

Individuals and organizations may want to consider the following questions:

- Should the Bank be clearer on how to request information? How could the Bank ensure that everyone who is interested is able to request information?
- Should the Bank better announce the availability of information? Should the ADB, for instance, announce that it is preparing a given project in your local newspaper or announce when new information on a project is available?
- Are ADB Resident Missions (in-country offices) accessible to the general public?
- What types of services would you expect to be provided by in-country ADB offices, e.g. internet access, documents in hard copy, knowledgeable staff to answer questions?

VIII. Translation

Translation is an essential component of access to information. If documents are not available in a language that people understand then the ADB is greatly undermining the value of disclosure. For this reason, any discussion of transparency must also address translation. Currently, the ADB does not have a translation policy or guideline. Translation of Bank documents to date has been conducted on an ad hoc basis.

Individuals and organizations may want to consider the following questions:

- What documents should the ADB translate?
- What ADB documents would be most useful for you in your local or national language?

IX. Disclosure Policy Compliance and Process Guarantees

Any disclosure policy is meaningless unless the ADB is held accountable for its implementation and the public can be assured accurate and timely responses to requests for documents. The fundamental principle in the ADB's Disclosure Policy is a "presumption in favor of disclosure of information" subject to the constraints outlined in the Policy.¹⁴ This means that if information does not fall under one of the "constraints to disclosure" listed in the Disclosure Policy, staff should presume that it can be disclosed.

This is a vital principle in the policy. However, the ADB has no mechanism to effectively implement it. For example, Bank staff have discretion to disclose or not to disclose many types of documents. As of yet, the ADB has no method to monitor whether or not these decisions are being made in a consistent, non-discriminatory fashion. That is, the ADB has no way to ensure that staff are properly exercising their discretion in line with a presumption in favor of disclosure. Rather, decisions to disclose or not to disclose are made on an ad hoc basis and may vary from country to country.

¹⁴ Asian Development Bank. *Policy on Confidentiality and Disclosure of Information*, August 1994: p. 17.

In addition to the presumption in favor of disclosure, the ADB’s policy articulates some guarantees that requests for information will be processed in a timely manner. The current Disclosure Policy states that any information requests will be relayed “within three days to the Information Officer.” Furthermore, these requests will be responded to “within 22 working days of the receipt of the request by the Bank.” Yet, once again, no monitoring mechanism exists to ensure that these process guarantees are being met. If the Bank does not reply to a request within 22 days, or does not reply to a request in an acceptable and satisfactory manner, the requestor has no recourse and no way to hold the Bank accountable to the requirements made in its Disclosure Policy.

Individuals and organizations may want to consider the following questions:

- Have your requests for information from the ADB ever been denied or not responded to?
- When requesting information from the ADB, do you receive a response in a timely manner? Does that response provide you with complete information? For instance, in the case of a denial, does the response state why requested information is confidential?
- Would the ADB benefit from having a “disclosure compliance mechanism” to ensure accountability of the disclosure requirements outlined in its policy?

Conclusion

Transparency is a multi-faceted issue. The questions outlined above begin to address some of these facets. However, we recognize that there are many more questions that can be raised throughout the course of the ADB’s review and we expect to expand this guide to capture those questions as well. With any edits or comments on this guide, please contact the Bank Information Center at jkalafut@bicusa.org.

Finally, there are many ways to influence the ADB. Sending comments directly to the Bank is only one mechanism to advocate for greater transparency. For more information on the activities of civil society around the review including additional resources about the ADB and transparency see www.bicusa.org.

This Guide was prepared by Jennifer Kalafut, Graham Saul, and Mishka Zaman with input from Jane Garrido and Abigail Parish. The Bank Information Center (BIC) is an independent non-profit, non-governmental organization that provides information and strategic support to NGOs and social movements throughout the world on projects, policies and practices of the Multilateral Development Banks (MDBs). BIC advocates for greater transparency, accountability and citizen participation at the MDBs. BIC is supported by private foundations and organizations that work in the fields of environment and development, and is not affiliated with any of the MDBs.

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APPENDIX 1: QUICK REFERENCE GUIDE

A review of transparency at the Asian Development Bank is underway. This reference sheet provides some details on the review process and resources to use during the review. Additional information is available from:

- NGO Forum on the ADB: <http://www.forum-adb.org/>
 - Bank Information Center: <http://www.bicusa.org/policy/InfoDisclosure/index.htm>
 - Asian Development Bank: <http://www.adb.org/Disclosure/default.asp>
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Calendar for the ADB Transparency Review

August 2003:	Review initiated
August 14 – November 14, 2003:	Comments accepted on existing practice
December 2003:	First draft of new policy released
January – February 2004:	In-region consultations held on first draft of policy
February 2004:	Public commenting on first draft concludes
March 2004:	Working paper prepared and disclosed
May/June 2004:	Board of Directors approves a new policy
Post-approval:	Staff awareness campaign Communication of new policy to all stakeholders Preparation and distribution of Disclosure Handbook Updating of Operations Manual

Where to Send Comments

Send comments to: Disclosure Review, Office of External Relations, Asian Development Bank
PO Box 789, Metro Manila 0980, Philippines
Fax: +632 636 2648 / Email: disclosure@adb.org

For contact information of ADB Executive Directors, go to: <http://www.bicusa.org/mdbs/adb/adbexecdir.htm>

Relevant ADB Policies and Papers

Links to the following documents can be found at: <http://www.adb.org/Disclosure/documents.asp>

- ADB Policy on Confidentiality and Disclosure of Information (August 1994)
 - ADB Information Policy and Strategy (1994)
 - ADB Resident Mission Policy (February 2000)
 - Summary of Disclosure Policy
 - Summary of Information Policy and Strategy
 - Operations Manual Section 52 Public Disclosure (March 2003)
 - Matrix of Disclosable Documents
 - Assessment of the Disclosure Current Policy
 - Background Rationale for the Review
 - Terms of Reference for the Review
-

Civil Society Analyses and Critiques of ADB Transparency

Links to the following documents can be found at: <http://www.bicusa.org/policy/InfoDisclosure/index.htm#ADB>

- *The ADB: In Its Own Words – An Analysis of Project Audit Reports for Indonesia, Pakistan, and Sri Lanka.* Environmental Defense and ADBwatch. July 2003.
- *Issues for Consideration During the ADB Review Process.* Bank Information Center. May 2003.
- *Good Governance or Bad Management.* Focus on the Global South. May 2002.