

## Comment on ADB's 1994 Disclosure and Information Policies

TO: disclosure@adb.org  
FROM: Ghulam Mustafa Talpur  
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Dear Sir/Madam

I am attaching the comments on Asian Development Bank information disclosure and transparency policy. As mentioned in the letter, we are not expert in transparency or information policies, but we possess sound field experience where these development projects are being implemented. We work closely with communities who are either directly or indirectly affected or influenced by mega development projects funded by ADB. We have presented our hard-core experiences in dealing with the transparency of few mega development projects funded by ADB in Pakistan.

We hope this will be useful.

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Disclosure Review  
Office of External Relations  
Asian Development Bank

**Subject: Comments on Information Disclosure and Transparency**

Dear Sir/Madam:

We take this opportunity to share with you that ActionAid Pakistan is part of a global partnership of people working for a better world, bound together by the vision of a world without poverty where people can exercise their right to a life of dignity. ActionAid works in thirty countries of the world, in South and South East Asia, in Latin America and in Africa. ActionAid Pakistan works in about 16 geographical locations on one dozen different themes.

We are not information policy/transparency expert, but we work closely with poor communities and they are directly or indirectly influenced or affected by the mega development projects financed by international financial institutions in Pakistan. We believe the openness and transparent process of international financial institutions is crucial for development. The non-transparent development projects in which information are hid from the people on different reasons proved fatal in Pakistan. We will provide the concrete examples in the following paragraphs with regards to Asian Development Bank, which is our hard-core experience.

In November 2000, SUNGI Development Foundation and Damaan Development Organization jointly managed a short survey of the CRBIP and wrote the report. The issues and the contents of the report were shared with (the report was not published yet) Peter Logan of ADB who was heading a review mission of the project in the area. The only concern he showed was that whether we would publish the contents in the print media or not.

In January 2001, in a meeting the report was shared with Kats Matsunami—looked liked he was aware of it and seemed very alarmed about it. (this initial report is appended with this packet separately).

In February the civil society organizations formally raised the issues with Kats and he seemed very considerate about our concerns—in fact the strategy of dealing with the CSOs had already been decided, that was to buy time, complete the project and get out of the area. We waited and wasted a lot of time. Finally the affectees started organizing the resistance and despite ADB's and WAPDA's efforts to push it under the rug, the movement strengthened.

In July ADB hired two consultants to manage the problem. The consultants (consensus building experts) took the view that there was a conflict or difference of opinion between the EAs/ADB and communities/CSOs and hence efforts had to be made to bring the consensus. The CSOs challenged this position by explaining that communities were the victim, looking for justice and needed justice only, not the consensus. The consultants stuck to their imagination and arrived at the conclusion of holding a multi-stakeholders workshop.

Because of 9/11, the process was postponed. Six groups were identified as stakeholders including the communities and CSOs and the other four were—Government officials (line agencies), EA (WAPDA, another government body), local government representatives (usually part of the same establishment) and the donors. The communities made it clear that they were

the true stakeholders, as they were affected adversely by the project and all others were only beneficiaries. So the whole workshop was dominated by these beneficiaries' agenda and hence the communities rejected the outcome of it. Still, what did the consultants recommend as a result, never got close to implementation.

### **Specific Examples**

1. Asian Development Bank was part of Multi-Million Dollar project of Left Bank Out Fall Drainage Project in water sector in Pakistan. The project is a good example of non-transparent mechanism used by IFIs. No single piece of information was shared with communities. No public consultations were arranged. Resultantly, the project has a big technical flaws and causing serious social, livelihood and environmental problems in coastal areas of Badin. During recent rains and overflowing of drain constructed under the LBOD led to flooding of vast area, 30 people died, thousands were dislocated, thousands acres of standing crop was damaged. We believe that if the communities had been consulted in the project planning phase and all the related information were shared with them, the damage would have been averted.
2. The other and which can be remembered as worst case of ADB financing in Pakistan, is the Chashma Right Bank Irrigation Project (CRBIP). ActionAid was involved in this project to understand the viewpoint of communities. We came to know that big mess was created by the project. Again this was done in non-transparent manner, as communities were never consulted or informed. When we tried to access the information it was either refused on various confidentiality grounds or released bit by bit.
3. During this campaign ADB never voluntarily shared the reports of various consultants on resettlement and social impacts. Not only these processes of the consultants were flawed, these were pushed through secretly. Communities remained suspicious about all these activities of the consultants; ironically ADB knew very well what was going on.
4. When the communities of CRIBP became organized and vowed to struggle for their rights In the wake of the acceptance of complaint the ADB management played another card in the name of Grievances Redressal and Settlement Committee (GRSC). These were the fact used to hide the entire non-transparent process of project. Entire process of GRSC kept confidential, even the minutes of the meetings were not shared with us.
5. The selection process of GRSC members, their TORs and its meetings record were kept confidential and proved our concerns that ADB was not transparent in dealing with the issue.
6. ADB Lacks institutional capacity/mechanism for information sharing.
7. The majority of population in Pakistan is illiterate. They even cannot read and write in local languages, how can they access the information written in English. ADB don't have such arrangement to translate documents.
8. Multi billion dollars project should be well advertised on local television and newspapers and wide consultations should be held to discuss. But no single ADB project has been planned in that way. All the projects were discussed with certain government officials and then decided.

9. ADB website has several problems. It is hard to find a full documents. One has to labor and download bit by bit and if the document is large and distributed in several chapters, all chapters are kept separately and not in consolidated format.
10. We are unable to access the decision of board of executives of the Bank. This is important for local accountability, especially to link up with the local Officials regarding these decisions.
11. All the IFIs are champion of promoting democracy and freedom, but the elected representatives of the assemblies have never been consulted nor briefed formally on the development projects initiated by the ADB. There is no such mechanism to hold wide public consultation including legislators.
12. There is no alert mechanism too. If the big organization like ADB bank have identified any development need and entered in dialogue with government officials, it should develop alert mechanism for other stakeholders about its activities, so that the people should come to know.