

**Consultation on ADB's Draft Public Communications Policy**  
**The Y on the Park, Sydney, Australia**  
**Summary of Participant Recommendations**  
**3 May 2004**

**Evaluation from Private Sector Representatives**

**A. Strengths of the Policy Draft**

- The document defines groups of stakeholders/audiences well.
- The policy attempts to overcome personnel idiosyncrasies – some may not want to be as open as they should be.

**B. Recommendations for Improvement**

**1. Operational Information (General)**

- The paper is not clear regarding to whom information is targeted, and what specific initiatives will be taken to reach those targeted groups. Define the stakeholder for whom you are releasing information.
- How will ADB respond to the feedback it receives from the community? How will ADB capture the feedback? What are the mechanisms, or options?
- What information will be available on tenders, loans and project cycle dates? The playing field should become more level for bidding.

**2. Project Information for Affected Groups**

- The timing must be as early as possible, and not later than PPTA fact-finding. This should be disseminated to all project stakeholders (community, NGOs, implementing agencies, consultants).

**3. Information that Should Not Be Disclosed**

- Who owns intellectual property? The answer to this question will impact what is released and to whom.
- Who defines legal constraints? Is there an external ombudsman who helps decide?
- Commercial (tenders) before they are announced would have to be restricted.

**4. Models/Best Practices**

- The World Bank's web site provides information by project, versus chronologically.
- Freedom of Information laws should be looked at, e.g., the Australian government.
- ADB should prioritize quality versus quantity, focusing on smaller programs with better quality outcomes. Is it realistic to deliver the level of information that is required?

**5. Resource Implications**

- The costs of the PCP have been underestimated. It will be expensive and, ultimately, consultants have to do the work. From where will the money come?

## **6. Implementation Arrangements**

- The policy does not specify how the policy will be implemented internally.

## **7. Monitoring of the Policy**

- The communications initiative needs to be monitored to see if poverty reduction has been improved as a result.
- There is no independent ombudsman. It will therefore be difficult for a community to understand to whom it can go. How will stakeholders ensure they have access to information to which they are entitled?

## **Evaluation from CSO Representatives**

### **A. Strengths of the Policy Draft**

- ADB's intent to reach out to the public is welcomed.
- The draft provides for significantly more disclosure.
- The policy provides a benchmark for holding ADB accountable.
- Specific disclosure provisions participants appreciated:
  - More regarding Board proceedings/minutes
  - Communication plans
  - Environment, resettlement, and indigenous peoples plans provided early in the project cycle
- More translation is provided.
- Consultations on this draft PCP are welcomed.
- There is general support for the redress and compliance mechanism proposed (but see recommendation under Implementation Arrangements below).

### **B. Recommendations for Improvement**

#### **1. General**

- It is not clear whether the policy is a public relations plan or if it is for full, presumed disclosure. This is reflected in the use of such wording as "target audiences," and "getting input from the affected people."
- The section on governance and corruption is weak and too generalized. What changes might occur in the bank?
- The name of the policy confuses and distorts the intent; suggest "Public Communications and Information Disclosure Policy."

#### **2. Operational Information (General)**

- The policy should provide more information for contractors in the design phase (or during/after award of contracts).
- Poverty, regional and country strategies should be disclosed in draft form. The poverty agreements and CSPs establish the parameters for projects, and too little is required to be disclosed before decisions have been made.
- Adequate lead time should be given for input to the CSP – e.g., Mekong RCSP draft was available at the meeting itself. ADB should encourage the participation of diverse civil society actors.
- Communication plans should be made public and be up for debate and consultation.

- The role of the government in disseminating information on ADB lending (CSP, RCSP, RETA, PPTA) is enhanced, but ADB should prioritize and invest in this if it is serious about disclosure.
- RRP, and the information that “sits behind them,” should be made available to the public and affected communities at least 90-120 days prior to Board consideration.
- There would be value in separating the public relations and disclosure policies. As it is written, the policy lacks clarity of purpose: informing about the bank or providing feedback/access so that others may influence the way the bank works.

### **3. Project Information for Affected Groups**

- Define “participation.”
- There is a danger that affected people would be flooded with too much information, and information may be misunderstood.
- The policy fails to adequately give voice to poorer communities. It does not conceptualise disclosure as a “rights” issue; start with that approach so that disclosure can result in free, prior and informed consent. Public relations is different.
- Environmental and social information should be provided in a timely fashion and in an understandable and useable form.
- Guidelines for disclosure to affected communities are needed to ensure ADB is proactive and communities and local governments are getting information face-to-face.
- Communities should receive complete information (analysis, evaluation, etc.) in order to participate. Specific types of information include:
  - A list of all documents produced in the project cycle, including whether they are disclosed or not (and why not).
  - Financial information about the project.
- Information should be provided in multiple languages.

### **4. Information that Should Not Be Disclosed**

- The following need to be defined: “business-sensitive,” “confidential,” and “as appropriate.”
- ADB must ensure the default is to full information disclosure and whatever is not disclosed is communicated to the public with reasoning provided. ADB should inform governments and companies what will be disclosed (not ask them what they want to disclose).
- Information that would compromise the privacy and/or safety of people/organizations/communities should not be disclosed.

### **5. Board of Directors Information**

- Board Minutes – Define “sensitive” information.
- The disclosure requirements regarding board transparency are insufficient.
- Sixty days for release of the minutes is too long.
- Information on board voting should be available – how boards are representing their constituencies. Many directors are responsible for a broad range of constituencies; how is their representation communicated back down to those in small member countries?

## **6. Translation**

- The translation requirements are insufficient – into one national language is not enough for many communities.
- The paper should not emphasize national languages as the default.

## **7. Private Sector Information**

- Disclosure needs to apply equally to private sector loans and financial intermediaries; the same conditions should apply.
- ADB should include on its site at least as much private sector information as is available in the public domain.

## **8. Approaches to Delivery**

- A reliance on the web is not appropriate for isolated communities; the role of the Resident Missions should be enhanced, and other means should be explored.

## **9. Models/Best Practices**

- Extractive Industries and the World Commission on Dams have disclosure recommendations.
- AusAID and ACFID have a process that promises when information will be provided on draft country strategies.

## **10. Implementation Arrangements**

- The policy should describe a plan for achieving the “cultural change” necessary to implement a policy presuming disclosure.
- Clarify what information will be available upon request, and what information is proactively disseminated.
- The policy is not clear regarding whom to contact for information.
- The role of the Public Communications Advisory Committee should be more fully explained as it relates to the Accountability Mechanism.

### **Evaluation from Government Representatives\***

[\* Officials attending the roundtable provided informal input into the discussion, while noting that a formal Government position would be developed prior to the ADB Board discussion later this year.]

#### **A. Strengths of the Policy Draft**

- The intent of the policy is good, e.g., transparency, communication, and participation.
- The policy provides for the earlier input of stakeholders.
- ADB is endeavoring to harmonize its policies with that of other MDBs.

#### **B. Recommendations for Improvement**

##### **1. Operational Information (General)**

- The process is top-down; there should be a greater focus on input as opposed to dissemination; ADB is putting information out instead of getting information in (e.g., explaining, disclosing, and disseminating). Enhancing participation seems to be secondary. The policy is not clear regarding the extent of participation, e.g., where does the PCP fall on the participation continuum (Inform → Provide Feedback → Influence). If

ADB's core business is poverty reduction, the communication should be about development outcomes.

- Timeliness - In order for it to be effective, timing is critical; people need enough time to respond in effective ways.
- Affected communities should be listed as an audience in paragraph 67.
- Communication plans (paragraph 70) should be compulsory, not optional.

## **2. Project Information for Affected Groups**

- The discussion of affected communities (paragraph 87) should be more up-front as the focus of the policy.
- Information should be provided to affected groups as early as possible.

## **3. Information that Should Not Be Disclosed**

- Private sector
- Information that would violate a country's sovereignty.

## **4. Resource Implications**

- There should only be minor cost implications.

## **5. Structure and Format of the Paper**

- Parts of document are legalistic and inaccessible, e.g., the disclosure section.

**Review of the ADB's Draft Public Communications Policy (PCP)  
Sydney Workshop, 3 May 2004**

**List of Participants\***

[\* Note: Some of these participants left before the discussion of the PCP]

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