

Dear Madam / Sir,

Sub: Comments on the Draft Public Communications Policy of Asian Development Bank (ADB).

The proposed Public Communication Policy ostensibly shows considerable improvement over the existing Information and Disclosure policies. But reading through the document especially para 9 leaves one with the distinct feeling that this whole exercise has been undertaken because of external compulsions rather than a sincere commitment to transparency.

Information essential for stakeholder participation in ADB loan funded projects are:

- a) Para 87 – Information for Project affected persons.
- b) Para 94 – Environmental Assessments.
- c) Para 95 – Resettlement Planning.
- d) Para 97 – Report and Recommendations of the President, ADB.
- e) Para 98 – Social and Environmental Assessments Monitoring Reports.
- f) Para 100 – Programme Completion Reports.
- g) Para 101 – Evaluation Reports and
- h) Periodical Progress Reports of the ongoing projects.

We appreciate the effort to make these documents publicly available. If these are to achieve their stated purpose, condensed versions of the same must be published in local newspapers and in the local language. Just publishing it on the web equals to denial of information to those stakeholders non-proficient in the English language, and unfair to those who have no access to the internet.

Following are our comments:

- 1) Para 67 – Should include members of legislative bodies, local urban and rural council members and communities. Media should include local newspapers and local television also.
- 2) Para 69, point 8 – Field visits facility to be available to community groups, NGOs and stakeholders apart from the media.
- 3) Para 70 - Communication policies must be developed for all individual projects and programmes.
- 4) Para 74 – ADB not only encourages but ensures providing of local language versions of project documents to stakeholders, especially residents of areas directly or indirectly affected by the project.
- 5) Para 76 – The disclosure clause should be removed and ADB should guarantee authenticity of translation.
- 6) Para 78 – Along with the list of CSPs and RCSPs, ADB should also provide a chart or flow diagram indicating project cycles and focus areas in India.
- 7) Para 85 – Project Information Document should include details of required consultations with Public.
- 8) Para 87 – Information about a project or programme be made available before the design period. The information be made available atleast 90 days before the fact finding mission.
- 9) Para 142 – In addition to information unit, ADB, Manila; Country Resident Mission should also provide documents or information. The details pertaining to individual projects must be available and accessible at project implementation offices.

10)Para 147 – The fee may be waived if the requests come from stakeholders or affected communities.

11)Para 158 – Not only the Public Communication Liaison staff, but all the staff must understand the issues of information dissemination and public relations.

There is no mention of 'Voluntary disclosure' on the part of your bank. Documents are to be sought from ADB's Resident missions or Head Office, Manila. This obviously limits the transparency, which is the basis of this policy. Information documents must be available at the local offices of the implementing agencies.

Loan 1704, the Karnataka Urban Development and Coastal Environment Management Project is supposed to have conducted at least 86 public consultations. What is ADB's definition of "public"? Even members of the Urban Local Bodies aren't aware of most of these consultations. Invisible transparency was what we had to bear with, despite the earlier twin policies of Disclosure and Information. We hope the new Public Communications Policy will put in place mechanisms and structures that ensure transparency in its essence and practice.

Yours sincerely,

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