

**Comment on ADB'S
2nd Draft Public Communications Policy (version 25 October 2004)**

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**Comments on the Second Draft Public Communication Policy of the Asian
Development Bank**

The draft shows a perceptible shift towards openness in ADB's operations. The policy that ADB presume disclosure unless the information meets the exception criteria should be diligently practised by the staff at all levels. Several of our earlier concerns seem to have been addressed, some in toto and some partly in the new draft. However some points still need addressing -

1. Field visit arrangements should be made available for community groups, NGO's and other stakeholders (para 94, pg 20). By making the media its primary audience, the ADB undertakes a mere PR exercise rather than offering project affected persons first hand information.
2. Usage of words of ambiguity and uncertainty should be avoided. For eg - The Communication Plans say 'ADB and member govts MAY jointly develop communication plans' and project information centres *could* be located in project executing office.' Here substitution with the word *will* would communicate a far more positive intent.
3. The reference to cost recovery has been removed from the PCP, however the PCP Handbook is likely to include a scheme for cost recovery. Such costs should only include copying and conveying expenses, not staff time charges.
4. Para 91 provides / points to an escape mechanism from undertaking translations. While literacy levels and existence of alternatives could be considered as criteria to determine translation, time and costs should not be.
5. Para 130 - To rein in corruption in project activities is of vital importance. Therefore, holding back of names of those blacklisted seems contrary. Publication of blacklisted names will act as a great deterrant in case of corruption.
6. Para 155 lists out documents not made publicly available. ADB should also provide an exhaustive list of documents generated by it at various stages of a project to help stakeholders decide which are of particular interest to them.

In reference to point no.2, all loan conditionalities and recommended policy changes as preconditions for a loan to member countries should necessarily be documents in the public domain.

Yours sincerely,

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