

**MAJOR RECOMMENDATIONS¹ FROM EXTERNAL STAKEHOLDERS ON ADB'S
2nd DRAFT PUBLIC COMMUNICATIONS POLICY (Made Publicly Available on 25 October 2004)**

	Feedback Received on PCP Draft 2	ADB Responses / How ADB Addressed Comments in PCP Working Paper
GENERAL		
Changes in 2nd draft PCP	<p>The changes in the 2nd draft PCP are few and cosmetic. Some said: Where changes have been made, they serve to mainly boost ADB's image rather than deepen its commitment to transparency and accountability. Contentious issues raised in past civil society comments and statements have not yet been resolved.</p> <p>They also said the current draft is silent on how certain decisions and the changes made to the draft were made. The policy should disclose the process and rationale behind the changes.</p> <p>Others, on the other hand, said: the draft shows a perceptible shift towards openness in ADB's operations.</p>	<p>Numerous changes were derived from external consultations. They related mostly to disclosure rather than external relations. [Please also refer to the list of major recommendations received on PCP Draft 1, and ADB's responses (http://www.adb.org/Disclosure/PCPdraf1-issues-responses.pdf).]</p>
Title of the Policy	<p>The title should be Public Communication and Information Disclosure Policy, which indicates that ADB is geared toward disclosure.</p>	<p>A subtitle "<i>Disclosure and Exchange of Information</i>" has been added. In ADB's views, "communications" denotes a two-way information flow. We feel the new complete title sufficiently underscores the disclosure element. The policy document itself clearly emphasizes the importance and significance of disclosure.</p>
National Laws vs. ADB Policies	<p>The policy does not meet standards in place in many national information laws. At a minimum, it should reflect national and local Right to Information laws and regulations. In addition, ADB should also be bound by member countries' international human rights obligations to freedom of information such as Article 19 of the UN International Covenant on Civil and Political Rights, ratified by many Asia Pacific countries.</p> <p>As long as ADB retains full control over what information should be disclosed and how to do it, the case that ADB is becoming more open and transparent than before. is less compelling. To</p>	<p>The PCP does not preclude greater disclosure by member countries; local laws still apply. Paragraph 172 indicates that ADB may disclose information listed as "exceptions to presumed disclosure" if a member country requests it to do so in accordance with its own law.</p>

¹ ADB received written comments from 2 individuals, and collective statements from 5 organizations. This document is a synthesis of the major recommendations.

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	guarantee effective transparency, ADB's freedom to not disclose information should be limited by some kind of international law, and not by corporate decisions that fluctuate according to circumstances.	
	Some commentators noted that ADB enjoys immunity to national laws (as in Bangladesh). There should be no such immunity to the disclosure policy or to ADB as an institution.	ADB's immunities are based on its Charter, which is an international treaty to which Bangladesh is a party. The immunities are incorporated in the Asian Development Order, 1973 (Order No. 3 of 1973) issued by the President of Bangladesh on 23 January 1973, which provides that the Articles of the Charter, which deal with immunities, shall have the force of law in Bangladesh. This Order was issued in compliance with Article 57 of the Charter, which requires each member of the ADB to take the necessary action to give full effect to the provisions of the Charter in each member's territory.
Link Between PCP and Transparency/Good Governance Standards	The policy must be linked to ADB's institutional decision-making processes, particularly those on inspection and anti-corruption. Information disclosure in and of itself does not satisfy the expected standards of transparency, accountability and good governance.	ADB is reviewing the implementation of its anticorruption and governance policies. Disclosure of anticorruption information and information produced under the Accountability Mechanism is described in paras 139 and 159-162 of the PCP, respectively.
	The paper seems to equate 'transparency' and 'disclosure', i.e. that the means, 'disclosure', is equal to the end 'transparency'. But disclosure is only one aspect of the issue of transparency; other aspects are the capacity of outsiders to effectively access the information disclosed by ADB and their ability to understand and use it for their benefit. Right of stakeholders, availability of information, capacity and ability of all parties are prerequisites of transparency. While the paper addresses the issue of disclosure, the others are alluded to. Don't they deserve more focus if they are really parts of the problem of transparency?	The PCP emphasizes the need for ADB to join forces with borrowing governments and project sponsors to provide mechanisms for communicating with people affected by ADB-assisted projects. Such mechanisms should be appropriate for these people, and consider their capacity to access the information.
ADB's Responsibility for Disclosure	There should be a shift from document-based disclosure to ADB's recognition of its obligation to disclose all information held. The obligation to disclose information for ADB financed and supported public and private sector projects should be on ADB. ADB cannot transfer its obligation to full disclosure on to	Following external consultation (April-July 2004), ADB reviewed all the operational documents it produces with a view toward exercising its presumption in favor of disclosure. In the PCP, ADB commits to disclosing all information that does not fall within a tightly defined list of exceptions.

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	governments.	
Communicating ADB's Message	The excess of release causing a flood of information that nobody bothers to read any longer would put ADB back to square one in terms of visibility and transparency. It is the perceived substance and relevance of the message and the results of ADB interventions that will entice partners to seriously consider ADB publications and recommendations. It will be all about WHAT ADB has to say to WHOM rather than HOW it conveys the message.	ADB will continue to target its messages toward certain groups of stakeholders, e.g., media, but the form and message will be tailored to specific audiences. (See paras 92 and 93 of PCP.)
Focus on Affected Persons	Disclosure should be more oriented towards project-affected people, communities and citizens, not towards industry, private sector and government.	The emphasis on the need for transparency in support of participatory development, especially with project-affected communities, has been enhanced throughout the policy.
PRIVATE SECTOR PROJECT INFORMATION		
General	The policy should not distinguish between public and private sector lending and projects. ADB is a public institution and should act as such, and not favor private sector interests, and because local people may be adversely affected by ADB-funded projects regardless of whether they are public or private.	ADB does not "favor private sector interests". ADB's processing requirements are different for private sector projects – many of the documents produced for the public sector are not developed for private sector operations. We have reviewed the disclosure of private sector information again and have made some changes (see responses below).
Documents Not Publicly Available	There may be good reasons for non-disclosure of private sector information, especially regarding commercially sensitive information. However, blanket statements that ADB will not disclose specific documents work against ADB's ability to adapt to future disclosure trends and are unnecessary since the policy has clearly defined exceptions which protect commercial sensitive information. ADB should remove all blanket statements of non-disclosure from Sections H and I of the PCP.	The PCP refers to a few documents not publicly available in order to be very clear that these documents contain only confidential information and will not be routinely disclosed. The PCP may be reviewed and amended as necessary to reflect changes in the institution and disclosure trends (see para 191).
	The draft is extremely weak on private sector projects. Given that all development projects are (directly or indirectly) publicly financed, information pertaining to all private sector operations in ADB supported development projects must be in the public domain. This is particularly important in light of increasing private sector involvement in ADB financed projects and programs. The business and competitive interests of project sponsors cannot	Para 91 now requires ADB's private sector project sponsors to consider how they will communicate with and disclose information to, affected people, especially regarding social and environmental issues. See also paragraph 129 regarding the disclosure of social and environmental monitoring reports.

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	take precedence over the public's right to know about the details of these projects, especially if the public will eventually shoulder the financial burden of these projects.	
Types of Information Disclosed	<p>In all private sector projects, ADB must disclose full and accurate information about:</p> <ul style="list-style-type: none"> • financing arrangements (including details of concession and actual financing agreements, risk and profit distribution, contingent and other liabilities, details of guarantee and counter-guarantee agreements, expenditure patterns, audit reports and anti-corruption reports) • production-sharing agreements, host-country agreements, power purchase agreements, economic and financial assessments, information on accident prevention and emergency response, and company annual monitoring reports to government agencies <p>After deleting any information that falls under the exceptions described in no. 8 of para 155 (now no. 8 of para 169), the following documents on private sector operations should be disclosed:</p> <ul style="list-style-type: none"> • Report and Recommendations of the President • Social and Environmental Monitoring Reports • Project Completion Report • Feasibility Studies • Legal Agreements <p>Information that ADB removes in this process should be subject to exception-based requests for information.</p>	<p>ADB will not disclose the business information of its project sponsors except if ADB determines that the public interest in disclosing such information outweighs the harm that may be caused by such disclosure. If ADB chooses to disclose such business information, and has entered into a confidentiality agreement with the business entity, ADB cannot disclose the information without that party's consent (see paras 172 and 173).</p> <p>An abbreviated version of private sector RRP's and social/environmental monitoring reports will be disclosed (see paras 127 and 129). Private sector project completion reports primarily evaluate the business side of the project (e.g., profitability), so cannot be disclosed. Feasibility studies have a market value and reflect the result of significant private investment. Legal agreements will not be disclosed because of their business nature.</p>
Extractive Industries Review	Disclosure of key documents related to the economic performance of projects in oil, coal and mining sectors are essential to achieve sustainable development. ADB should give serious consideration to the final report of the EIR and incorporate its recommendations in the PCP.	ADB has not yet decided on the EIR recommendations.
EVALUATION OF THE POLICY		
Methodology	The methodology on how the policy will be evaluated should be clearly articulated.	The framework for evaluating the PCP is now included as Appendix 4.

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ANTICORRUPTION INFORMATION		
Blacklisted Firms and Individuals	Para 130 - Holding back blacklisted names seems contrary to reining in corruption in project activities. Publication of blacklisted names will act as a great deterrent in corruption cases.	ADB considers that it is best able to implement its Anticorruption Policy by not listing blacklisted names. See a complete discussion of this topic: http://www.adb.org/Anticorruption/issues.asp
OTHER INFORMATION		
ADB's Budget and Financial Information	ADB should disclose detailed information on its operational budget, including a clear indication of departmental budgets and other aspects of resource allocation. ADB should also release detailed information on actual expenditures.	ADB's budget document is developed for internal purposes and deliberation and contains information subject to the PCP's exceptions, such as ADB's future borrowings, financial forecasts, and average staff salaries and benefits.
Staff Contact Information	The ADB staff directory should be disclosed. While ADB may not want to disclose room numbers due to security concerns, it should disclose a complete staff listing, including position and e-mail.	The PCP requires the disclosure of contact information for senior staff (Director and above), Board members, and the Board of Governors. ADB is very mindful of related security issues.
TWO-WAY COMMUNICATION		
	The paper speaks of community-level participation in the decision-making process. This participation looks more like an asymmetric exchange whereby the community contributes in information and commitments and ADB provides information and feedback on decisions already made that affect their lives. For the paper, participation equals ex-ante contribution and ex-post comment and endorsement, which is fine, but poses the problem of who decides what.	ADB requires consultation to enable stakeholders to give their views before decisions are made, and the PCP calls for information to be provided in advance of consultation.
	ADB should not only disclose information. It must also recognize that its disclosure policy should result from the demands and aspirations of the people.	The form, language, and manner of communication with affected people should be tailored to meet their specific needs (see para 99).
COMMUNICATION PLANS		
	Use of ambiguous words should be avoided, e.g. on communication plans, the draft states "ADB and member governments <i>may</i> jointly develop communication plans" and "project information centers <i>could</i> be located in project executing office." Substituting the word <i>will</i> would communicate a far more positive intent.	ADB prepares approximately 400 new projects and programs each year including loans, technical assistance and equity investments. ADB cannot commit to developing communications plans and information centers for all such activities.

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TRANSLATIONS		
General	<p>The translation strategy should make a clear commitment to the translation of specific documents into national and local languages. ADB should also consider developing a more comprehensive strategy aimed at enhancing local dissemination of information. Although the current proposal covers some costs related to translation and to better dissemination, ADB should make a clear commitment to allocating adequate resources for the full implementation of such a strategy.</p> <p>Documents should be translated to the local language and placed on the web site. Brief translation does not cover fully all subtleties of a document. It is necessary to translate the entire document to the local language and provide all technical appendices.</p>	<p>These comments will be fully addressed when ADB develops its translation framework.</p>
For Project-Affected People	<p>The PCP should clearly state that translation of the following documents is mandatory and should not leave it up to the translation framework to address.</p> <ul style="list-style-type: none"> • Project Information Documents (PID). Some information contained in the PID (ex. estimated dates for appraisal authorization and Board consideration, and the responsible ADB officers) is ADB-specific, and borrowers or project sponsors have nothing to do with them. In addition to working with borrowers, ADB itself should prepare and update translated versions of the PID for general disclosure (this incurs no additional costs because the same information will be prepared anyway). • Key policy documents including safeguard policies, anticorruption mechanism and the PCP along with the associated sections of the Operations Manual. Because these policies are prepared to protect the interests of affected people, they should be translated and disseminated to affected people. If these are not translated and affected people remain uninformed of their rights under these policies, the aim of the Accountability Mechanism will not be 	<p>Communication with project-affected people must be in the appropriate language. The PCP now states that, at minimum, the same information that is contained in the Project Information Document (PID) must be conveyed in a relevant manner to project-affected people (see paragraph 115). This allows those administering projects to determine whether they should just translate the PID, or provide the same information in another culturally-appropriate way. Communications plans would also identify translation needs.</p> <p>Resettlement, indigenous peoples, and environmental information must be provided in a language understandable to those affected (see paragraphs 123-126). These, and general project information (see paragraph 115) are the documents necessary to support consultation. The Project Information Document would also include the project progress reports for public sector projects (see paragraph 112), and this information must be provided to affected people.</p> <p>These suggestions will be considered further when ADB</p>

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	<p>the aim of the Accountability Mechanism will not be achieved.</p> <ul style="list-style-type: none"> • Social and Environmental Monitoring Reports. ADB should require executing agencies or project sponsors to prepare monitoring reports in local languages. 	develops the translation framework.
Cost of translation	<p>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.</p> <p>The cost of providing information in national and local languages should be borne by ADB.</p>	This recommendation and its resource implications will need be further explored when ADB develops a translation framework.
DELIVERY MECHANISMS		
Mechanisms for Reaching Affected People	The draft policy is still not specific regarding how ADB intends to disseminate information beyond the Internet.	Disclosure to the general public will primarily be through the Internet. The methods for targeting project-affected people will vary according to the local situation (see paras 98 and 99).
List of Approaches to Delivery	Field visit arrangements should be made available for community groups, NGOs and other stakeholders (para 94, page 20). By making the media its primary audience, ADB undertakes a mere PR exercise rather than offering project-affected persons first hand information.	The project site visits mentioned in para 99 are primarily intended for media, although other interested parties may be considered, bearing in mind resource implications.
DISCLOSURE OF OPERATIONAL INFORMATION (General)		
BTORs and Aide Memoires	<p>Back to Office Mission Reports should be available upon request and should not be considered internal documents. In addition to the PID, <i>Aide Memoires</i> and PPRs should be routinely disclosed, redacted if necessary according to the disclosure exemptions outlined in Section J.</p> <p>Information regarding social and environmental issues contained in <i>aide memoires</i> and Back-to-Office Reports (BTOR) should be made publicly available after removing information borrowers do not agree to disclose.</p>	<p>ADB considers BTORs to be staff memos to supervisors. They will not be disclosed in order to allow frank discussion among staff.</p> <p>The PPRs will be disclosed – these are not documents but rather information entered into a computer system. Para 112 indicates that such information will be disclosed in the PID during project implementation.</p> <p>Information regarding social and environmental issues contained in <i>aide memoires</i> and Back-to-Office Reports</p>

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		will be disclosed in the Project Information Document.
PROJECT INFORMATION		
Project/Program Information Document (PID)	It should be made clear that the PID will also include information on unexpected environmental and social issues and the responses of executing agencies/project sponsors and ADB (para 105).	Information to be disclosed in the PID is detailed in para 110. ADB staff monitor projects under implementation, and enter information about the project's status and any issues encountered. This set of information is called Project Progress Reports. PCP Para 112 notes that this information will be extracted into the PID and disclosed.
Report and Recommendation of the President (RRP)	Public and private sector draft RRP's and R-Papers pertaining to safeguard policies, other operational policies, and sector and thematic strategies should be released and summaries of Board discussions on these should also be disclosed.	ADB has determined that mandatory disclosure of draft RRP's could impede project processing and interfere with the deliberative process. The PCP allows for the release of draft safeguard policies and sector and thematic strategies, including those versions that are discussed by the Board (i.e., the "W-Paper" and "R-Paper").
Safeguards Policy Compliance Memorandum	Appendix 4 Safeguards Policy Compliance memorandum should not be considered an internal document.	The SPCM is an internal memo, serving ADB's internal project processing requirements. The information contained in this memo is disclosed through the PID, environmental assessment, resettlement and indigenous peoples plans.
Loan Conditionalities	All loan conditionalities and recommended policy changes as preconditions for a loan to member countries should be documents in the public domain.	"Conditionalities" are publicly available in the public sector loan agreements as well as in the RRP's.
BOARD OF DIRECTORS' INFORMATION		
Transcripts, Minutes and Discussion Summaries	Transcripts of Board meetings should be made publicly available. Some commentators said that Board members need freedom to discuss issues openly, but they also state that disclosure of transcripts will not affect Board members' freedom to speech. Public scrutiny ensures that ADB will make better decisions for the people it serves by bringing in more information and opinions to ADB's decision-makers. All proposals for Board consideration. including those circulated	Board members were consulted on these issues and believe disclosure of transcripts and proposals for discussion at the Board meeting would negatively affect the deliberative and decision-making process.

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	to the Board on a non-objection basis, should be disclosed at the same time they are circulated to the Board.	
EXCEPTIONS TO PRESUMED DISCLOSURE		
General	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.	The 2 nd PCP Consultation Draft included an appendix (Appendix 2) listing all operational documents regularly produced by ADB. The Exceptions section lists information (not documents) that will not be routinely disclosed. The PCP also calls for the disclosure of a list of factual technical documents that will be developed under a project.
	The policy is still geared towards <i>constraints</i> rather than disclosure, there is change in the 2 nd draft but the tone remains the same.	The policy is founded on a presumption in favor of disclosure, and the exceptions are clearly defined.
Blanket Exceptions	Two exceptions are blanket in nature and not premised on harm to any legitimate interest. The exception relating to internal documents should focus on information the disclosure of which would undermine, either harm the deliberative process within ADB by inhibiting the free and frank provision of advice or exchange of views, or the effectiveness of a testing or auditing procedure. Regarding decision-making and policy development, the exception should be limited to information that, if disclosed, would prejudice the effective formulation or development of policy, or would seriously frustrate the success of a policy, by premature disclosure of that policy.	Exceptions no. 1 and 2 have been edited to address this concern.
IMPLEMENTATION ARRANGEMENTS		
Acting on Presumption in Favor of Disclosure	The policy should be more specific and conclusive, rather than narrative. The policy should unambiguously favor full disclosure and not allow for selective interpretation by ADB management and project staff. The presumption of disclosure should be diligently practiced by ADB staff at all levels.	The language has been tightened throughout to specify the timing for release wherever possible, and to clarify the documents that will be disclosed. The PCP is based on a presumption in favor of disclosure.
Compliance Review	ADB Management must not have discretion over what provisions in the policies are subject to inspection or not. Such discretion	ADB's Board of Directors is the body that decides which policies. or provisions in policies. are subject to compliance

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	<p>falls into the mandate of the Compliance Review Panel (CRP). ADB should stop developing the new appendix that lists provisions subject to compliance review as this violates para 143 of the paper, Review of the Inspection Function: Establishment of a new ADB Accountability Mechanism, which states:</p> <p>“The Board will decide whether a particular policy is an operational policy subject to compliance review and it is for CRP to determine which part of the operational policies and procedures was or is not complied with after carrying out a compliance review of the request concerned. Management will not carve out which operational policies or procedures should be excluded from compliance review.”</p> <p>For purposes of this policy, the scope of compliance review is "ADB's operational policies and procedures" as they relate to the formulation, processing, or implementation of an ADB-assisted project, and excludes matters relating to the procurement of goods and services, including consulting services, and non-operational housekeeping matters, such as finance and administration.</p>	<p>review. The Board has indicated that it expects Management to propose those sections of the policy subject to review under the Accountability Mechanism. The PCP now proposes that all disclosure requirements be subject to compliance review. To add precision and clarity, these requirements have been repeated in an appendix. We anticipate receiving further guidance in this matter.</p>
<p>DOCUMENTS OF ACCOUNTABILITY MECHANISM</p>		
<p>Final Review and Assessment Reports produced by OSPF</p>	<p>The disclosure requirements in para 147 contradict ADB's Accountability Mechanism and Operations Manual. ADB proposes that Final Review and Assessment Reports be made publicly available following stage 6 of the consultation phase.</p> <p>Para 29 of the OM Section L1/OP states that all stages of the consultation phase will be as transparent as possible while ADB's Accountability Mechanism states that both draft RARs and final RARs should be disclosed to the public in step 4 and at the end of step 6, respectively, unless the complainants voluntarily agree not to disclose them.</p> <p>Para 29 of the OM Section L1/OP states that the final agreement and solutions will be kept confidential only when the parties so agree, and the final report of the consultation phase should be disclosed to the public (para 27).</p>	<p>The objective of the consultation process is to find solutions to the problems raised by people adversely affected by ADB-supported projects. The Office of the Special Project Facilitator (OSPF) is independent from the rest of ADB and treats the parties equally, considering, of course, power inequalities between parties. Settlements -- agreements on actions to remedy problems -- can only be reached if all the parties agree. It is in this spirit that disclosure of documents of the consultation phase is subject to the agreement of relevant parties.</p> <p>The consultation phase is bound by the principle of transparency on one hand and the principle of confidentiality on the other. It is a general principle in Alternative Conflict Resolution that information provided in</p>

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	Para 147 - Report publishing should not require Government's approval. The accountability reporting added to this draft is poor with the government having power to block disclosure in the Consultation Phase.	confidence to a neutral party will not be provided to any other party. Maintaining confidentiality is critical to a facilitation process, wherein the priority is to address the problems of the project-affected people on the ground.
CRP Press Advisory	Para 149 - CRP should publish the request not just a "press advisory"	The Accountability Mechanism Policy calls for the release of a press advisory. See the registry of requests at www.compliance.adb.org -- the request is also posted.
INDEPENDENT RECOURSE MECHANISM		
	<p>The policy must include recourse to an independent appeals body who will interpret ADB's stated presumption in favor of disclosure and provide an independent review of the regime of exceptions. The policy must be under the review of the Compliance Review Panel (CRP) and ADB should establish streamlined procedures for the compliance review on the PCP.</p> <p>Some commentators recommended an "accelerated process" for CRP's review of disclosure appeals which would not require requesters to approach the Office of Special Projects Facilitator (OSPF) before the complaint is forwarded to the OCRP. The "problem solving" and mediation function of the OSPF will already have been performed by the PDAC. Any individual or interested party, regardless of whether or not they are harmed by ADB's non-disclosure, should be eligible to lodge a disclosure related appeal with the OCRP.</p> <p>There should be clear mechanism to take recourse to CRP if ADB provides wrong and delayed information. ADB must provide adequate compensation if it provides any wrong information and if there is any damage because of delay in providing information.</p> <p>Without an external and independent supervisor that enforces compliance with international legal obligations and standards, the degree of institutional transparency/opacity will continue to vary with the nature and interpretation of corporate rules. ADB should come up with recommendations for establishing such an external</p>	<p>These comments have been carefully considered by Management. ADB's view is that the newly created Public Disclosure Advisory Committee (para 174), which will convene as needed to review requests for information that have been denied elsewhere, has the breadth and capacity to function effectively as a recourse mechanism. As with all aspects of the new PCP, this will be carefully monitored and reported, and amended as necessary (see paras 189-192).</p>

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	watchdog that would monitor the conformity of multilateral agencies to certain standards. An internal watchdog such as the PDAC has little credibility if it is not independent or at arm's length from ADB.	