

Comments on ADB's Draft Translation Framework

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Below are BIC's comments on the draft ADB Translation Framework. We found many aspects of the Framework to be quite good, and would like to acknowledge your contribution/s to making it a good starting point. Apologies for our delay in sending these comments.

We found the following points to be especially important components of the Framework:

- + The Framework clarifies language from the PCP that basic project information (for public and private sector projects) must be available to stakeholders in an appropriate language(s). (However, it does not specify what basic project information is.)
- + Oftentimes, member governments will have a document in a language other than English and it is important that ADB makes the commitment to request the non-English language version from the government and make it publicly available on ADB's website.
- + *We support the recommendation that all of the following documents are translated in a more systematic fashion:*
 - + CSP and CSP Updates
 - + General information on the ADB (including ADB Profile, Country Profile/Fact Sheet, and some Press Releases)
 - + Basic ADB Policies (including Safeguard policies, PCP, Anti-Corruption Policy, Environmental Assessment guidelines, etc.)
 - + Other institutional/strategy documents (if not the whole document, a summary will be translated)
 - + Documents on ADB major topics ("In Brief" series on topics such as clean energy, accountability, MDGs)
 - + Localized websites

We are concerned regarding the following issues and recommend that ADB address these in the final Framework:

- The Framework is not an ADB policy so it is not subject to compliance review nor has any more weight than voluntary guidelines. How can translations be made systematic/routine if there is no enforcement/accountability provision in the document itself?
- It does not address or emphasize how the public can request or demand the translation of documents. While this is, in practice, how translations have been generated to date, we recommend that the translation request process be more formalized. The public should be encouraged to make recommendations to ADB about what should be translated. A “translate on demand” consideration/option should be included in document.
- The Framework states several times that ADB will only translate it's own documents, not documents "owned" by project sponsors or the borrowing government. We recommend that ADB ensure that key project documents (in addition to safeguard documents) produced by a “borrower/client” (such as feasibility reports, etc) are translated by ADB if a request is made for these, and if the latter (borrower/client) does not translate them.
- The Framework does not identify specifically what detailed project information will be routinely translated.
- The ADB should ensure that translations of documents for public consultation (in person or via the web) are made available at least 30 days before the event/comments deadline
- Para 76: Sometimes important information is made available as appendices/annexes, so the point that translation of appendices “may not be needed” needs to be qualified/judges according to the type of information provided in an appendix. Whenever appendices are not translated, this must be clearly/prominently stated in the document, giving titles not translated.
- There is no budget attached to the Translation Framework. Will a specific budget request to implement this Framework be made to the Board?
- It is still on clear who takes responsibility for decisions regarding translations. If a member of the public would like to request the translation of a document, to whom should she/he make that request and who ultimately makes the decision?
- ADB should add "demand for translation" in the list of criteria for determining whether to translate a document.
- Language translation: We feel for Afghanistan, in addition to Dari, Pushto should also be considered depending perhaps on the region in which the ADB sponsored activity is taking place. Pushto translations can also be used for audiences in the Northwest Frontier Province of Pakistan.

We hope these are useful comments and welcome any questions or feedback.

Best regards,

Jen and Mishka

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