

**Comments on Draft Document Translation Framework
External Consultation, June 1 to July 31, 2006**

Category	Comment	Response
Budget	<p>1. The draft framework has mentioned repeatedly the budgetary constraints for translating the ADB documents. However, we believe as a publicly-funded institution, ADB should endeavor to provide every member-nation and its citizenry equitable access to comprehensive, comprehensible, reliable and accurate information vis-à-vis its various interventions. If, indeed, it is serious and sincere in communicating meaningfully with affected communities and concerned stakeholders, then it must devote all the necessary resources to translate pertinent documents in their national languages. Thus, the framework should include a provision increasing the budget appropriation for translation undertakings.</p>	<p>The revised draft of the framework includes a budget that will enable ADB to translate a much wider set of documents than in the past. It also includes funds to establish an infrastructure that will enable more cost-efficient translation.</p> <p>The framework will be approved by Management and circulated to the Board of Directors.</p>
	<p>2. There is no budget attached to the Translation Framework. Will a specific budget request to implement this Framework be made to the Board?</p>	
Compliance review	<p>3. The framework should clarify that even though it is not an operational policy, it is still bound by a compliance review under the Bank's accountability mechanism. Since this framework comes into effect under the Public Communication Policy, we believe that it should be subjected to the accountability mechanism.</p>	<p>The translation framework is called for by the PCP; it is not part of the policy itself. As a framework, it outlines the ways in which ADB will expand the extent of information made available in languages other than English. It is not an operational policy. ADB's Accountability Mechanism is limited to a review of operational policies.</p>
	<p>4. 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?</p>	<p>ADB plans to routinely translate the awareness-raising and other documents described in the framework; upon approval of the framework, the enhanced translation budget will also be approved. For project-related documents, ADB will continue to work closely with the borrower to ensure that information is disseminated in a relevant language</p>

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		and form (see PCP paragraph 74).
Demand for documents	5. The framework should establish a mechanism for the people to request or demand any project-related document when they feel it is necessary for people to be better informed.	The revised framework now states that members of the public may request that a document be translated into a particular language by sending an email to disclosure@adb.org. The InfoUnit will forward these requests to the appropriate document owners in order for them to factor in demand into their decision-making process.
	6. 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.	
	7. It is still not 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?	
	8. ADB should add "demand for translation" in the list of criteria for determining whether to translate a document.	This has been amended to read, "Demand for Translation. Have there been requests for the document to be translated?"
Translation by borrowers	9. The statement, "ADB encourages borrowers and sponsors to play a key role in translation," is rather vague because it fails to list documents which borrowers and sponsors are required to translate. Thus, the Bank should set a minimum list of documents that these borrowers/sponsors should translate.	In accordance with ADB's charter, the translation of project-related documents needs to be funded under the respective project budget. ADB's safeguard policies already specify that relevant information from environment, resettlement, and indigenous peoples' documents must be made available to affected people in an appropriate language and form. These documents are "owned" by borrowers/sponsors, according to ADB's safeguard policies.

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	<p>10. The Framework states several times that ADB will only translate its 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.</p>	<p>Noted. In accordance with the PCP, ADB is committed to ensuring that information is provided to project-affected people in an appropriate form or language. (See also above response.)</p>
Publicly available	<p>11. Whereas the framework specifies that documents are "publicly available," particularly on the ADB website, then it should be made available in the national languages of member countries and not only in English. Otherwise, it runs counter to its own "public availability" provision.</p>	<p>ADB's PCP defines "publicly available" as "available on ADB's website." The PCP also specifies that information must be made available to affected people, which means "available in an appropriate form, manner, and language and at an accessible location to be understandable to affected people."</p>
Documents to be translated	<p>12. Translation should not only focus on "awareness-raising" documents. It is imperative that it encompass all Bank policies (i.e., safeguard, sectoral and accountability) as well as pertinent /crucial documents relevant to the project cycle (i.e. feasibility studies, operational manual and project information but not limited to these). This would enable communities and stakeholders to have a better understanding and appreciation of issues/concerns arising from ADB-funded projects. In view of this, the framework should clearly state the inclusion of the aforementioned and other needed documents in its translation coverage.</p>	<p>"Awareness-raising" documents include ADB strategies and policies that help external stakeholders to engage with ADB (please see Section IV, Part C of the framework document). This would include safeguard, sectoral and accountability policies. The framework urges projects to plan for translation of critical documents or information relevant to the project cycle. Section IV, Part D now includes language that says, "To aid in effective communication with affected people, DER's InfoUnit will distribute guidelines on disseminating information for affected people."</p>
	<p>13. The Framework does not identify specifically what detailed project information will be routinely translated.</p>	

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	14. I think in many recipient countries, decision makers have good English skills and therefore, there are few problems in a practical way even without translation. Then simply cost-benefit analysis should be done. But I assume the cost would be significant to translate all related documents. Then, it should be limited to main documents.	Noted.
Translations for public consultation	15. 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.	Please see framework Section IV, Part D, Subsection 5 on “Information for Consultation and Participation.” It now includes the sentence, “To allow the public to participate meaningfully, translations of documents for public consultation (in person or via the web) should be made available with ample time before the consultation event or comments deadline. Longer documents should be made available with greater lead time so that consultation participants have an opportunity to become familiar with the material.”
Translation of appendices	16. 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/judged 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.	The sentence referred to has been changed to read, “The sponsoring department of the document should consider what is necessary to translate; for example, appendices may not be needed if they do not contain information critical to the audience. (If the appendices are not translated, the translated document should state this and list the titles of appendices not translated.)”

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Languages/ countries for translation	17. A provision calling for ADB to consult with civil society organizations, apart from concerned governments, in identifying other languages relative to document translation (especially in cases involving indigenous peoples) is needed. This would enable external stakeholders to monitor the projects/programs better.	The introduction to Appendix 2 has been appended to include “input from in-country civil society organizations” as an example of criteria that will be used in refining the list of languages for translation of awareness-raising documents. Please also note that the introduction specifies that the list of languages outlined is for awareness-raising documents, and “would not be applied to communication with project-affected people, which would vary according to the language needs of the people in question.” This would apply to cases involving indigenous peoples; the languages for translation in those situations is determined on a case-by-case basis rather than by consulting the list of languages for translation.
	18. There should be translation for every country that has an ADB loan.	The framework calls for documents and information to be translated in any ADB developing member countries where English is not widely spoken.
Languages for translation – specific countries	19. 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.	ADB is following the lead of the Government of Afghanistan, which thus far does not provide translation of its own documents into Pushto. However, based on the commitments of the Public Communications Policy, ADB will ensure that people affected by an ADB project are provided information about the project in a language accessible to them.

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	<p>20. I am concerned that there is no need to interpret the framework or documents from ADB to Fijian or Hindi and it remains in English. My hope is that documents from ADB will and can be interpreted into the Indigenous Language of Fijian and Hindi.</p>	<p>As English is the official working language in Fiji, ADB publishes all documents in English. However, ADB does also publish documents in Fijian and Hindi, depending on the audience targeted. For example, "Priorities of the People - Hardship in the Fiji Islands" series and the "Resettlement Framework" for one of ADB's roads projects were translated into Fijian and Hindu. Based on the commitments of the Public Communications Policy, ADB will ensure that people affected by an ADB project are provided information about the project in a language accessible to them.</p>
	<p>21. It would be great if the issues of ADB were translated into Russian, because most of the people who don't know English can read Russian. That's why it will be very good from your side to translate into the Russian language. Generally it will be excellent if you translate.</p>	<p>Noted. The framework calls for translation of many ADB documents into Russian. In addition, there will be a pilot website in Russian for ADB activities in Kyrgyz Republic and other Russian-speaking countries.</p>
	<p>22. I found that there is no translation into Khmer. I am not sure whether there will be Khmer translation. If there is any Khmer translation, it would be appreciated if the text is simple and understandable. As a Cambodian, I have met difficulty in reading and understanding Khmer, my native language.</p>	<p>Although the draft translation framework was not translated into Khmer, the framework calls for ADB awareness-raising documents to be translated into Khmer. We agree that any Khmer translation should be easily understandable, and will work on developing a roster of competent translators.</p>
Localized web sites	<p>23. "Publicly available": ADB should design websites for internet low bandwidth. Many countries only have low bandwidth. (See: aidworld.org)</p>	<p>Noted. We will pass on this comment to the team developing the pilot localized web sites.</p>

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Conveying information effectively to different audiences	24. Using matrices, flowcharts and pictures will be very useful for affected people.	Agreed. The PCP and the framework recognize that different audiences need to have information conveyed to them in different ways.
	25. Simplify your language. Short sentences will be good for ordinary people.	
	26. Documents should include a recipient suggestion; one topic with many packages (such as for educated people, for ordinary people, etc.)	
Translation for donor member countries	27. I think the ADB activities should rather be disseminated in many donor countries, where there are bigger business entities, possibly working together with ADB. Also for getting national consensus for sustainable contribution to the ADB.	Noted. ADB will continue to translate many documents into Japanese. Please see Appendix 3 of the framework regarding Translation for Donor Member Countries.
Management of translators	28. Management of translators is often difficult. In reality, even though well-qualified translators for these types of documents are not many, but not very hard to find. Therefore a special translator group for ADB projects should be established in order to have work done in a short time and cost reduced.	Agreed. The framework encourages resident missions to maintain a roster of translators that they use and to engage these translators through an efficient contracting method in order to ensure that quality work is done in an efficient and cost-effective manner.
	29. Simplify your translation step without reducing the quality.	Agreed. The framework aims to make the process of procuring translation easier while ensuring the quality of translation.
Stakeholder consultation	30. We think that this approach of stakeholder consultation is very useful and effective, not only to the donor but also to the stakeholders, who are in the position to understand well the local conditions and people. However, we believe that if the consultation is done through workshop/seminar, we could achieve even better outcomes.	Please note that ADB has consultation and participation guidelines where this is addressed. They may be found at http://www.adb.org/Documents/Guidelines/strengthening-participation-for-dev/default.asp .