



Bank Information Center Comments on the Proposed Changes to the IDB's Information Disclosure Policy March 2003

On January 13, 2003, the InterAmerican Development Bank (IDB or the Bank) released a draft of its new Information Disclosure Policy for public comment. Please accept this document as our submission to the consultative process. We thank you for this opportunity and look forward to seeing these points reflected and responded to when the IDB provides feedback to external actors on the outcome of its ongoing consultations.

Our comments below are divided into three sections. Section one outlines areas where the IDB's draft Policy falls short of the standards already applied at other Multilateral Development Banks (MDBs). The IDB's draft Policy would expand the range of information made available to the public and we commend the Bank for its willingness to move forward in a number of important ways. However, the proposed Policy still falls short of the standards set by many of the other MDBs. At a minimum, the IDB should use the Disclosure Policy review to bring its standards in line with those already established in other parts of the MDB community.

Section two outlines how the IDB could demonstrate leadership by overcoming the limitations that are common to the disclosure policies of all of the MDBs. While we acknowledge that the MDBs have made progress towards greater transparency, MDB disclosure policies still do not reflect a holistic commitment to transparent, accountable and participatory decision-making. There are, however, specific steps that could be taken to overcome this situation.

Section three calls on the IDB to promote an institutional culture that encourages innovative disclosure practices and robust public information centers. It draws on two recent examples from the World Bank to demonstrate how progress might be made in this direction. First, the World Bank has recently embarked on 13 "Pilot Activities" in borrowing countries. These Pilots are designed to encourage World Bank country teams, in cooperation with borrowing governments, to disclose additional information on a pilot basis. Second, the World Bank has developed a strategy to strengthen its Public Information Centers in order to improve its ability to disseminate information in borrowing countries and to adequately respond to requests from stakeholders. We believe that the IDB should adopt similar measures.

Thank you once again for this opportunity to comment.

Section 1: IDB Standards Compared to other MDBs:

This section identifies areas where other MDBs have already set higher standards than those proposed in the IDB's draft Disclosure Policy. At an absolute minimum, the IDB should bring its draft Disclosure Policy in line with the standards referenced below.

1.1. Policy and Strategy Documents:

The proposed language on the release of draft policy and strategy documents should be strengthened.

The draft IDB Disclosure Policy states that:

When appropriate in the public interest, Bank staff may consult with institutions and individuals outside the Bank and may share drafts with them prior to submission of *operational or sector policies, sector strategies* and *sector guidelines* to the programming committee and/or Board.¹

The corresponding language used by the European Bank for Reconstruction and Development (EBRD) is far from perfect, but ultimately much stronger than the proposed IDB policy. The EBRD's Public Information Policy states:

In the spirit of its willingness to listen and be receptive to comment, the EBRD will release (*draft*) *sectoral policies* before final approval by the board of directors... Such (draft) sectoral policies will be posted on the EBRD's website for a period of 45 calendar days, during which time the public will be invited to send comments to the Bank. In this regard, management will proactively stimulate stakeholders' interest in, and contributions to, the drafting process of these policies. A summary of such comments will be made available to the Board of Directors for Committee discussion before final approval of policies. After the policy's approval the summary will be posted on the Web site.²

For its part, the World Bank's Policy on Information Disclosure states that the "*draft Concept Note* and *Consultation Plan* for a [*Sector Strategy Paper*] under preparation, as well as the *draft SSP*, are publicly available upon notification to the Executive Directors of such proposed disclosure."³

1.2. Environmental Documentation:

There are unwarranted waivers for the disclosure of Environmental Assessments.

The IDB is proposing to continue to allow the disclosure requirements for *environmental assessments* to be waived if "a borrower objects to release of an *EIA* or other environmental analysis." In such a case, "the matter will be taken to the Board of Executive Directors for a decision on how to proceed."⁴

¹ Proposed IDB Information Disclosure Policy, Section III, A, paragraph 1.

² EBRD Public Information Policy, page 2.

³ World Bank Policy on Disclosure of Information, paragraph 13

⁴ Proposed IDB Information Disclosure Policy, Section III, A, paragraph 8.

In 1998, the IFC specifically removed a similar waiver from its Disclosure Policy.⁵ Similarly, the disclosure policies of the Asian Development Bank and the African Development Bank do not include provisions for waiving the release of environmental assessments.

The IDB should disclose Environmental Impact Assessments 120 days prior to Board approval.

The draft Disclosure Policy states that *Environmental Impact Assessments (EIAs)* will be disclosed prior to loan appraisal. We support the disclosure of EIAs prior to loan appraisal but believe that the draft Disclosure Policy should also commit to releasing the EIA 120 days prior to project approval in order to define a minimum timeline that will guarantee adequate space for public feedback. This is consistent with the practice currently in place at the Asian Development Bank (ADB) and the African Development Bank (AfDB), both of which require the disclosure of EIAs a minimum of 120 days prior to Board approval. Furthermore, the commitment to disclose EIAs 120 days prior to loan approval applies to both public and private sector operations at the ADB and the AfDB.

For every operation, the IDB should release a summary that identifies environmental and social policy issues and the process through which they will be addressed.

Paragraph 30 of the World Bank's Information Disclosure Policy states that:

The [World] Bank prepares an *Integrated Safeguards Data Sheet (ISDS)* for each investment project and sector adjustment operation under preparation for Bank financing, which identifies key issues under the [World] Bank's safeguard policies and provides relevant information concerning their management in the proposed operation. The ISDS is prepared when the first formal review of the proposed operation is held by Bank management, and is made publicly available. As project preparation evolves, the ISDS is updated. It is revised before formal appraisal; if changes to the project that are relevant to the ISDS are made after appraisal, a final revision of the ISDS is prepared.

The IDB should ensure that its social and environmental screening is equally transparent.

1.3. Documents in the Project Cycle:

The IDB should reinstate references to factual and technical documents.

The IDB's current policy makes reference to "*factual and technical documents*,"⁶ whereas the draft Policy does not. The World Bank's policy states that the "director concerned may release *factual technical documents*, in whole or in part, after consulting with the borrower concerned."⁷ The IDB should meet a similar standard.

A list of factual and technical documents should be available early in the project cycle.

According to World Bank policy, a list of *factual technical documents* "that underpin project preparation (including analytical work, assessments, surveys, etc) is contained in the *PID [or Project Information Document]*."⁸ The *PID* is the World Bank's equivalent of the IDB's *Project Profile (Perfil II)*.

⁵ See IFC Public Disclosure Policy, footnote 5.

⁶ IDB Operational Policy 102, Section 1.

⁷ World Bank Policy on Disclosure of Information, paragraph 16.

⁸ World Bank Policy on Disclosure of Information, paragraph 15.

Project profiles, summaries and abstracts should be released in all cases and should be released at specific times in the project cycle.

The draft Policy proposes to disclose *project or technical cooperation profiles, project abstracts, reports or eligibility memoranda*

once the respective Management Committee has approved them, with the exception of documents related to the private sector or the Small Enterprise Fund of the MIF. For the latter two types of operations, a *summary project abstract* will be made available to the public (after a mandate letter is signed in the case of the private sector operations or after the complete abstract is approved by the respective Management Committee...)⁹

This ill-conceived phraseology is sure to confuse external stakeholders and raises critical questions: (i) Could the Management Committee decide not to approve the project profile? (ii) Could the Management Committee decide to approve the project profile or the project abstract either just before or well after project approval?

It is now standard practice at other MDBs to ensure that project briefs, profiles, abstracts and summaries are disclosed: (i) for all loans, and; (ii) with time commitments.

The World Bank's Disclosure Policy states that:

For all lending operations under preparation for Bank financing, the Bank prepares a *Project Information Document (PID)* that provides a brief factual summary. The PID is prepared when the first formal review of the proposed operation is held by Bank management, and is made publicly available. As project preparation evolves, the PID is updated.¹⁰

The World Bank's Disclosure Handbook further clarifies that: "the team leader transmits the PID electronically to the InfoShop no later than five business days after the Region provides clearance for proceeding with the preparation of the proposed operation following the Project Concept review."¹¹ Note that the World Bank provides specific commitments at specific times.

The Disclosure Policy of the World Bank Group's private sector arm, the International Finance Corporation (IFC), states that its *Summary of Project Information (SPI)* "is designed to make project information available to interested parties prior to a project's consideration by the Board of Directors..." and that the SPI "is released no later than thirty (30) days prior to the Board date..."¹²

The EBRD's Public Information Policy states that a *Project Summary Document (PSD)* is prepared "for each private and public sector project" and is disclosed "at least 30 days prior to consideration by the Board of Directors" for private sector projects. For public sector projects the "PSD will be released as soon as possible after the project has passed its Initial Review by the Bank's management (typically 4-5 months before Board consideration), and at least 60 days before Board discussion."¹³

⁹ Proposed IDB Information Disclosure Policy, Section III, A, paragraph 5.

¹⁰ World Bank Policy on Disclosure of Information, paragraph 15.

¹¹ The World Bank's Disclosure Handbook, paragraph 22.

¹² IFC Public Disclosure Policy, *Summary of Project Information*.

¹³ EBRD Public Information Policy, Section 3i, page 4.

The IDB should make provisions for the disclosure of private sector board reports.

The IDB's public sector *Board Reports* are currently disclosed after Board approval, but this is not the case with *Board Reports* for private sector operations. The ADB makes provisions for the release of its private sector board reports, known as the *Report and Recommendation of the President*, "with the prior consent of the project sponsors."¹⁴

The IDB should make provisions for the release of social and environmental monitoring reports.

Under the IDB's draft Disclosure Policy, the *Annual Report of Projects in Execution* in each of the borrowing countries (*ARPE*) will be disclosed. This is a positive development. However, the EBRD recently proposed a more significant measure that would disclose freestanding social and environmental monitoring reports for specific projects. The EBRD proposal states:

For all categories of projects where significant environmental, safety, health or social issues have been raised, or where the affected public is particularly interested, the EBRD will encourage or require project sponsors to commit to ongoing information and communication programmes. For example, the Bank may require the results of ongoing environmental monitoring to be made available to the public... As part of the annual environmental reporting requirements to the Bank, project sponsors will be asked to provide a summary on the environmental status and implementation of project environmental requirements for publication on the Bank's website, attached to the Project Summary Document for the project.¹⁵

1.4. Financial Intermediaries:

The IDB's proposed policy is silent on the question of financial intermediaries.

Both the World Bank and the International Finance Corporation have begun articulating disclosure requirements for financial intermediary lending. The IDB should take advantage of the review process to grapple with this increasingly important dimension of the IDB's work.

1.5. Evaluation Material

The IDB should clearly state what reports are produced by the Office of Evaluation and Oversight (OVE) in order to facilitate a comparison with other MDBs.

The IDB should disclose a complete list of the documents produced by the Office of Evaluation and Oversight, regardless of whether or not the individual documents are themselves disclosed. In absence of such a list, it is difficult to evaluate the degree to which the IDB's draft Disclosure Policy meets the standards recently set by the World Bank.

In its draft Disclosure Policy, the IDB is proposing to disclose *Strategy Evaluations, Policy and Instrument Evaluations, Country Program Evaluations* and *oversight documents* such as *methodological guidelines, evaluability assessments* and *annual reports on evaluation activities* of

¹⁴ See the ADB's Policy on *Confidentiality and Disclosure of Information, Implementation of Policy, Private Sector Documents*.

¹⁵ EBRD Environmental Policy Review, page 16, Annex 2.

the IDB. This additional disclosure should represent significant progress in the release of evaluation material. However, it is not clear what OVE documents will remain confidential.

For instance, the Operations Evaluation Department (OED) of the World Bank prepares evaluations of selected completed operations. These evaluations are known as *Project Performance Assessment Reports (PPARs)* and *Impact Evaluation Reports (IERs)*. These documents are disclosed after they have been distributed to Executive Directors.¹⁶ It appears as though the OVE produces a similar document called the *Development Impact Evaluation*,¹⁷ but these documents are not mentioned in either the current or the proposed IDB Disclosure Policy.

Similarly, the World Bank's OED prepares *sector and thematic evaluations* (which report on the implementation of World Bank policies and development effectiveness of the World Bank's activities in a particular sector or thematic area). These documents are disclosed after they have been discussed by the Executive Directors, unless the Executive Directors decide otherwise. The IDB's website makes reference to *Sector Portfolio Reviews*, which appear to be similar to the above mentioned World Bank documents, but neither the current nor the proposed IDB Disclosure Policy makes reference to Sector Portfolio Reviews.

1.6. Independent Investigation Mechanism:

The transparency of the Independent Investigation Mechanism (IIM) is far behind that of comparable mechanisms at other MDBs.

The IIM does not disclose the equivalent of the following information:

- *Requests for Inspection*, the document filed by the complainant outlining the complaint. This is disclosed by the World Bank's Inspection Panel and is proposed for disclosure under the draft review of the ADB's Investigation Mechanism.
- An *Inspection Panel Register*, which provides information about the status of a claim. This is disclosed by the World Bank's Inspection Panel.
- A *Roster of Investigators*, the individuals that could be called on to investigate the claim in the case of the ADB or, in the case of the World Bank, the list of Panel Members. All of the existing MDB accountability mechanisms disclose this kind of information.
- *Management's Response to the Request for Inspection*, the ADB and World Bank mechanisms disclose these documents.
- *Inspection Panel's Terms of Reference*, although not explicit in its current Inspection Policy, in practice the ADB releases the Inspection Panel's draft terms of reference in order to solicit feedback from all stakeholders, and releases a final terms of reference. This good practice is included in the ADB's proposed new accountability mechanism.
- *An Annual Report* is proactively released and placed on the institution's website by all of the existing MDB accountability mechanisms except the IIM.

1.7. Archives:

Contradictory statements on access to Archives need to be reconciled and the proposal's timelines for disclosure should be shortened.

¹⁶ World Bank Policy on Disclosure of Information, paragraph 48.

¹⁷ See the IDB's website at <http://www.iadb.org/cont/evo/RE/RE249e/re249eindex.htm>

In section II of the draft Policy, under Basic Principles, the IDB states that the *Archives* are “inviolable.” However, in section III E2, the draft goes on to state that “historical information will be made available to the public [on request] 20 years after issuance.” These two statements seem incongruous. There is also no information provided on procedures for accessing archived documents.

The ADB’s archives are automatically declassified five years after issuance with the consent of the relevant government. Further, with some exception, the World Bank makes “historical information that was not publicly available at the time of its issuance, but would be publicly available under [the 2002 Information Disclosure] policy” available after five years.¹⁸ The IDB’s timeline for availability of its archives should also be shortened to five years after issuance.

1.8. Board of Executive Directors:

The IDB should disclose the Board’s monthly schedule and summaries of Board discussions.

We support the IDB’s proposal to disclose the *Board’s annual work program*. However, the provisions in the IDB’s draft Policy still fall short of the minimum standards now applied at the World Bank Group in at least two important respects:

- The World Bank Group now discloses the *Monthly Update of the Board’s Schedule* “containing matters that are planned for consideration by the Executive Directors” over the course of the upcoming month.¹⁹
- The World Bank discloses *Chairman’s Concluding Remarks* and *Summings-up* of Board discussions related to certain country and sector strategies, policies and certain other issues if the Executive Directors so decide.²⁰

The IDB should, at a minimum, meet these standards.

1.9. International Standards:

Many Latin American countries have recently developed or improved their domestic laws on information disclosure. However, basic components of credible domestic freedom of information legislation are missing from the disclosure standards of the MDBs, including the IDB’s draft Disclosure Policy. These include topics such as:

The IDB should establish clear process guarantees, including requirements of timely decision-making and that refusals be accompanied by substantive written reasons.

¹⁸ World Bank Policy on Disclosure of Information, paragraph 78.

¹⁹ World Bank Policy on Disclosure of Information, paragraph 64.

²⁰ World Bank Policy on Disclosure of Information, paragraph 66.

In its “Code of good administrative behaviour for the staff of the EIB in its relations with the public,” the EIB articulates clear guidelines for its staff in handling requests for information. For example, it states that

Members of staff shall ensure that, as far as possible, all citizens writing to the Bank in one of the languages of the Treaty receive a reply in the same language..., receipt of all letters and requests addressed to the Bank shall be acknowledged within two weeks of their delivery to the competent department..., [and] all replies to requests and complaints must be reasoned in such a way that the person concerned is precisely informed of the grounds and arguments on which they are based.²¹

These are just some of the process guarantees established within the EIB’s “Code of good administrative behaviour for the staff of the EIB in its relations with the public.”

The IDB should ensure that individuals have the right to appeal refusals to disclose information to an independent body.

While as yet untested, the EIB has subjected its disclosure policy to oversight by the European Ombudsman. The EIB policy states: “Failing a reply within the deadline prescribed in Article 13 of the Code of good administrative behavior or in the event of a total or partial refusal following a complaint, the applicant shall be free to contact the European Ombudsman...”²² Additionally, the UNDP provides for the establishment of an Oversight Panel for appeals, consisting of three UNDP professional staff members and two members from the non-profit sector in its Public Information Disclosure Policy.²³

ARTICLE 19, a non-governmental organization working on issues related to access to information, has developed a standard setting work entitled, *The Public’s Right to Know: Principles on Freedom of Information Legislation*.²⁴ These standards have been endorsed by the UN Special Rapporteur on Freedom of Information and Expression. The Special Rapporteur on Freedom of Expression for the Organization of American States has also affirmed these fundamental principles. The IDB should demonstrate leadership by embracing these principles and ensuring that they are reflected within the context of its Information Disclosure Policy. It is our understanding that Article 19, in cooperation with other organizations, will submit comments to the IDB that will elaborate on the above points.

Section 2. Systemic Weaknesses in MDB Disclosure Standards:

As demonstrated above, the IDB’s draft Disclosure Policy falls short of the standards set by other MDBs in a number of important respects. However, there are also important weaknesses that are common to the disclosure standards of all of the MDBs. This section outlines ways that the IDB could become a leader in efforts to address these systemic weaknesses.

2.1. Board of Directors

Executive Directors should no longer govern in almost total secrecy.

²¹ EIB “Code of good administrative behaviour for the staff of the EIB in its relations with the public,” page 3.

²² EIB “Public Access to Information – Rules on Public Access to Documents,” Article 8.

²³ UNDP Public Information Disclosure Policy, 1997, paragraphs. 20-23.

²⁴ See Article 19’s website: <http://www.article19.org/docimages/512.htm>

Citizens should have the right to full information on the way in which they are represented in the Bank's Board. Anything less will ultimately leave the Board in the contradictory situation where it finds itself today: promoting good governance in borrowing countries but deliberating in almost total secrecy. Board sessions should be a matter of public record, if not open to the public itself (perhaps by closed circuit television). In exceptional circumstances closed sessions could be conducted upon request and with adequate justification. Similarly, personnel and other internal matters could be debated in closed sessions. As a minimum step, following Board consideration, **minutes and summaries of the Board discussion** related to a given loan, policy or strategy should be disclosed. Ultimately, it is essential that full **transcripts** of Board discussions are disclosed.

2.2. Board Reports:

The MDBs should acknowledge that meaningful participation requires the timely disclosure of substantive information.

MDB disclosure policies are generally geared towards informing people of decisions that have already been made, rather than giving people the information that they need to participate in decision-making. There are notable exceptions to this rule, but in general the MDBs fail to share detailed information early in the deliberative process and are more comfortable distributing outcomes of decisions rather than working drafts. This is perhaps best exemplified by the failure of the MDBs to release detailed project information (such as draft or final draft board reports) prior to project approval. The IDB's **Project Profile (Perfil II)** does not address this problem. Instead, the IDB should commit itself to disclose final drafts of **Board Reports** before loan approval.

2.3. Private Sector Lending:

The MDBs sacrifice public accountability, participation and development effectiveness in order to cater to private sector demands for secrecy.

Almost all of the IDB's project-related documents mentioned in the draft apply only to the public sector. These include all project documents (with the only exception of project abstracts); Status of Projects in Execution; Project Completion Reports; Monthly Operational Summaries (an important new document proposed under the draft policy); summaries of financial information with regard to approved Bank loans and other operations; and contracts, agreements, and other legal documents. The only other exception is a few environmental documents, which themselves have clear distinctions in disclosure between public and private lending. The rights of local stakeholders to reflect on the consequences of a publicly financed project should not vary depending on whether the implementing agency is a public or private institution. Maintaining two standards for disclosure suggests that due diligence and citizen rights are being sacrificed in the interest of private sector expediency. This is a dangerous and unnecessary trade-off and the IDB should seize the opportunity to increase the transparency of its private sector operations to not only meet, but to go beyond the standards set by other MDBs.

Section 3: Proactive, Responsive and Innovative Disclosure:

The quality of the IDB's interaction with affected communities and interested organizations depends in part on the degree to which staff seek out ways to enhance stakeholder participation in the design,

implementation and evaluation of projects. Proactive and dedicated staff can greatly enrich the quality of public consultations and help to develop trust between the IDB, project sponsors and affected communities. Towards this end, the IDB should encourage its staff to identify opportunities to disclose additional information and disseminate existing information in a more effective and culturally appropriate manner. The IDB should also ensure that its public information centers are adequately equipped in borrowing countries.

The IDB should launch pilot programs in borrowing countries designed to disclose additional information.

The World Bank's "Pilot Activities in Information Disclosure" are designed to increase the "number and type of documents that are made publicly available" and to better disseminate information to "target audiences, especially those affected by Bank operations." These Pilot Activities, under implementation in roughly 13 countries, encourage country teams to "test ways for the World Bank and governments to provide additional information on [country strategies] and lending operations under preparation and implementation, as a basis for improved development effectiveness." This sends a message to country teams that the World Bank values greater transparency and encourages its staff to experiment with practical ways to improve disclosure.²⁵

World Bank operations are still characterized by unnecessary secrecy and untimely disclosure, but the institution is at the very least actively experimenting with innovative approaches to greater transparency. An IDB Pilot program, focusing on disclosing additional information in certain countries, would send an important signal that the IDB is also actively seeking ways to disclose additional information in the interest of stakeholder participation.

The IDB should conduct an independent assessment of its ability to disseminate operational information in borrowing countries and should develop a strategy to improve the public's access to information.

The World Bank has developed a new strategy for "Strengthening Public Information Centers." Under the new strategy, regional and country-level operations will develop communication strategies that articulate how enhanced and targeted information can be better disseminated to a broader public. Public Information Centers (PICs) will be upgraded to better serve an audience beyond those that "seek out information,"²⁶ and PICs will be mandated to proactively disseminate information.

Training will be provided to PIC staff so that they can serve as in-country experts on information disclosure. They will be trained to have, "a broad understanding of Bank policies, procedures, and lending instruments, and knowledge of the information management systems of the Bank, the Bank's disclosure policy, and appropriate dissemination strategies."²⁷ PIC staff will be required to "promote compliance with the disclosure policy as it relates to projects and monitor the prompt release of all disclosed documents"²⁸ and will help maintain and develop a country website where possible in the national language. The IDB should train its staff responsible for information disclosure and create incentives that reward fulfillment of disclosure standards. Additionally, fulfillment of information disclosure functions should form part of the employees review criteria.

Under the World Bank's new strategy, resources will also be provided to enhance the facilities of country PIC offices. "Good facilities include a reference desk area, a reading area, library shelving for

²⁵ See the World Bank's website at: <http://www1.worldbank.org/operations/disclosure/disco-pilots.html>

²⁶ World Bank "Strengthening Public Information Centers," Section III paragraph 18.

²⁷ World Bank "Strengthening Public Information Centers," Section III.C, paragraph 26.

²⁸ World Bank "Strengthening Public Information Centers," Section III.B, paragraph 1.

books and operational reports, display shelving for new items and free brochures, a photocopier, and a computer/printer area with at least one computer equipped with a CD-ROM drive and linked to the Internet.”²⁹ The IDB should ensure that its public information centers are adequately funded and equipped in borrowing countries.

In order to determine the effectiveness of its own Public Information Centers, the IDB should finance an independent assessment of its information dissemination capacities in borrowing countries. Based on that assessment it should develop a clear strategy to ensure that operational information is readily accessible to interested parties and proactively disseminated in remote areas.

Conclusion:

We do acknowledge that the IDB’s proposed draft Disclosure Policy would represent an improvement over previous standards. We also strongly support the IDB’s proposal to “report to the Board on the experience under this policy on an annual basis.”³⁰ However, in a number of important respects, the draft Policy lacks coherence and clarity and fails to fully embrace standards that are common in other MDBs.

We thank you again for this opportunity to comment on the IDB’s proposed Information Disclosure Policy and look forward to seeing these points reflected and responded to in the Bank’s feedback on the Information Disclosure Policy consultation.

Questions and comments can be directed to Graham Saul at the Bank Information Center, by email gsaul@bicusa.org or phone (202.624.0626).

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The Bank Information Center (BIC) is an independent non-profit, non-governmental organization that provides information and strategic support to NGOs and social movements throughout the world on the projects, policies and practices of the Multilateral Development Banks (MDBs). BIC advocates for greater transparency, accountability and citizen participation at the MDBs. BIC is supported by private foundations and organizations that work in the fields of environment and development, and is not affiliated with any of the MDBs.

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²⁹ World Bank “Strengthening Public Information Centers,” Section II.A, paragraph 7.

³⁰ The IDB’s Presentation of the Bank’s Information Disclosure Policy, paragraph 12.