

# ACCESS TO INFORMATION

## Policy Implementation Report

### 2015



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## ELECTRONIC LINKS

1. [List of most frequently downloaded documents on the Bank's website](#)
2. [Information requests received by country](#)
3. [Requests for historical information with the largest number of declassified documents in 2015](#)

## ABBREVIATIONS

ACP/REC	Records Management Section
ADB	Asian Development Bank
AfDB	African Development Bank
AIC	Access to Information Committee
CDB	Caribbean Development Bank
EBRD	European Bank for Reconstruction and Development
EIA	Environmental impact assessment
ESIA	Environmental and social impact assessment
ESMR	Environmental and social management report
EXR	Office of External Relations
IATI	International Aid Transparency Initiative
IFC	International Finance Corporation
IIC	Inter-American Investment Corporation
KNL	Knowledge and Learning Sector
MIF	Multilateral Investment Fund
OTRS	Open-source Ticket Request System
OVE	Office of Evaluation and Oversight
PIC	Public Information Center
SEC	Office of the Secretary
SEC/ATI	Access to Information Section





*Bags await the arrival of participants to a training session on the Access to Information Policy.*



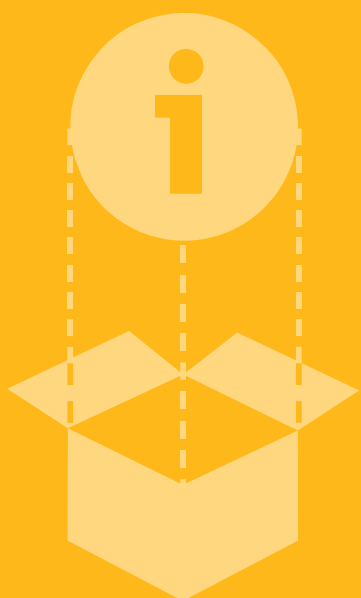
- 1.1 This report marks the fifth anniversary of the entry into effect of the Access to Information Policy (hereinafter, the Policy),<sup>1</sup> a tool for increasing transparency at the Inter-American Development Bank (hereinafter, the IDB or the Bank) and enhancing accountability in its activities.
- 1.2 Guided by the principle of maximum openness as a core pillar and reaffirming the presumption for disclosure, the IDB has carried out a process for implementation of the Policy over the past five years that has taken regulatory, governance, systems, and other aspects into consideration.
- 1.3 This report has been prepared to familiarize the Board of Executive Directors (hereinafter, the Board) with the implementation activities carried out in 2015, as established in section 11.1 of the Policy. It has five chapters, an introduction, and a conclusion.

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<sup>1</sup> Document [GN-1831-28](#).



*XV IDB-Civil Society Meeting held in the city of Tegucigalpa, Honduras, on November 5. SEC/ATI was present on the “Open Data: Tools for Civil Society” panel, whose objective was to reflect on the opportunities and challenges that open data and technology bring to civil society organizations.*



# ACCESS TO INFORMATION POLICY AND EXTERNAL STAKEHOLDERS

## A. PROACTIVE DISCLOSURE

- 2.1 In addition to serving as a tool to enhance the transparency of Bank operations, the Policy contributes to the dialogue on sustainable development in the region's countries. Thus, maximizing the accessibility and usability of information through increasingly proactive disclosure is a perennial challenge.
- 2.2 In 2015, the IDB launched a new website that took into account the search needs of users by making significant improvements to the project pages to make it easier to find information on operations. The new website got 2,346,447 hits in 2015, compared with 2,072,905 hits in 2014, for an increase of 13%.
- 2.3 The increase in visits to the website reflects the needs expressed by the public to be able to search for information on the IDB. In 2015, the Bank conducted a survey for the purpose of gauging and analyzing public satisfaction upon visiting the website<sup>2</sup>. A total of 7,687 people completed the online survey<sup>3</sup>. A major finding was the strong emphasis and interest among users in being able to locate information on Bank projects. **Table 1** (below) includes detailed information on one of the questions that was asked in relation to searches for information on Bank projects.

**Table 1:** What specific types of project information did you look for today?

Browsing project information	<b>46%</b>	Monitoring project progress	<b>20%</b>
Loans and grants	<b>28%</b>	Civil society participation	<b>19%</b>
Project procurement opportunities	<b>22%</b>	Other	<b>5%</b>
Private sector financing	<b>21%</b>	Report fraud and corruption	<b>1%</b>

2 EXR was responsible for conducting the survey, which was administered by the firm ForeSee Customer Insights.

3 March 2014 – March 2015.

- 2.4 In line with the improvements to the corporate website, ongoing improvements have also been made to the Access to Information pages with the goal of creating a one-stop shop for users.<sup>4</sup> In 2015, the site received more than 30,000 hits, compared with 23,000 in 2014 and 14,000 in 2013. Of the total number of visits to the site in 2015, 16,650 were to the Spanish version, 12,471 were to the English version, 1,306 were to the Portuguese version, and 193 were to the French version. The most visited pages were those dealing with information requests and the Access to Information home page.
- 2.5 Although information technologies are supporting the right of access to information by disclosing information as open data, which allows the public to use, re use, and redistribute it, there is still considerable demand among users for obtaining information in hard copy. Indeed, the number of documents downloaded from the corporate website has continued to rise every year. In 2015, a total of 1,320,697 documents were downloaded, compared with 982,204 in 2014 and 859,000 in 2013. **Electronic Link 1**, included on the contents page of this report, contains a list of the documents that were most frequently downloaded in 2015.
- 2.6 In 2016, ongoing efforts will be made to take a more proactive approach to disclosing the information that the Bank produces. Work will continue with the various departments to identify new types of public documents and ensure that all public information is disclosed in a timely and accessible manner<sup>5</sup>.

## **B. INFORMATION REQUESTS**

- 2.7 In 2015, the Public Information Center (PIC) received a total of 9,380 requests for information, of which 2,007 were received via an online form<sup>6</sup> (3,204 in 2014) and 7,373 were received by the Country Offices (7,738 in 2014) via email or telephone. The requests received at Bank headquarters via online form are disaggregated below by sector (**Figure 1**) and by subject matter (**Figure 2**). The corresponding data for the requests received by country can be found in **Electronic Link 2** of this report.

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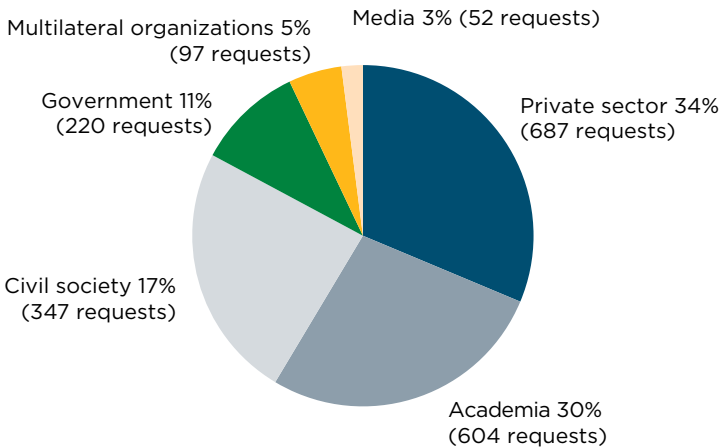
4 The improvements have reflected feedback received from the public via a survey that external users can take directly on the Access to Information webpage. Seventy-seven percent of respondents in 2015 rated the accessibility of information on the webpage positively.

5 It is interesting to note the work done by *Office of Strategic Planning and Development Effectiveness (SPD)* in 2015, which in the framework of the update to the *progress monitoring report (PMR)* platform, released 1,324 reports containing important information for the public corresponding to the execution stage of projects.

6 The total number of requests received included 47 requests for historical information, which is information produced or held by the Bank prior to 1 January 2011, when the current Access to Information Policy went into effect.

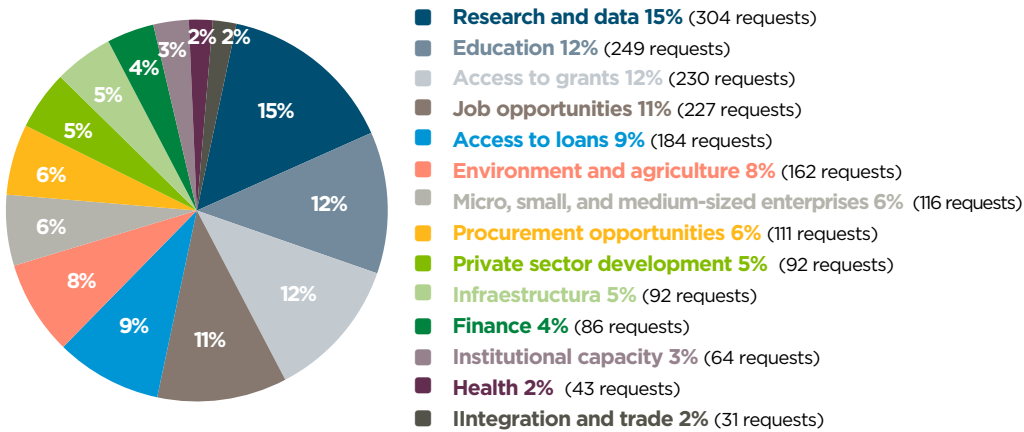


**Figure 1:** Requests received at Headquarters, by sector



Source: Public Information Center (PIC)

**Figure 2:** Requests received at Headquarters, by subject matter



Source: Public Information Center (PIC)

- 2.8 In 2015, there was a further reduction in the number of information requests that were received via online form. This may be explained by the improvements made to the Bank's external website, the goal of which was to provide a more accessible platform built around a single repository of project information. The incorporation of pop-up messages on the request form with links to seven frequently asked questions may also have contributed to the 5% reduction in the number of requests<sup>7</sup>. There was also a 5% reduction in the number of requests received by the Country Offices in 2015.

### C. DENIALS OF REQUESTS FOR INFORMATION

- 2.9 The Bank has the right to deny access to information based on any of the 10 exceptions established in the Policy.<sup>8</sup> In 2015, six requests for information were denied in accordance with the exceptions concerning information relating to non sovereign guaranteed operations, country-specific information, and deliberative information. **Table 2** provides a summary of these requests.

**Table 2:** Denied Requests

#	Request for information	Request for review
1	Terms of reference and completion report for two projects in the private sector: one in the automotive industry and another in industrial development.	No
2	Audited annual financial statements for private sector Multilateral Investment Fund (MIF) operations.	No
3	Information on the participants and the logical framework matrix, concerning how and why the private sector project on the Upper Maipo River in Chile was approved.	No
4	IDB President's agenda for the period 1 August-11 September 2015.	No
5	Status report and project summary for the Health Services Upgrading Program in Mexico (ME0159).	No
6	Annex I, Annex II, and Annex III of a MIF Donors Memorandum.	No

<sup>7</sup> The pop-ups appearing on the information request page generated 457 visits to the frequently asked questions, disaggregated as follows: access to grants (160), access to loans (137), employment opportunities (91), and procurement opportunities (69).  
<sup>8</sup> Paragraph 4.1 contains the list of exceptions (document GN-1831-28).

## **D. CIVIL SOCIETY AND OPEN DATA<sup>9</sup>**

- 2.10 Promoting the Policy among civil society organizations is an important activity and an ongoing part of the implementation process. In 2015, building on the work of the previous year, SEC/ATI continued to organize training activities targeting a variety of civil society organizations, in coordination with Bank officials in each Country Office. In 2015, two training workshops were held for approximately 20 organizations belonging to the Civil Society Consultative Groups in Jamaica and Honduras.
- 2.11 Also, on the occasion of the XV IDB-Civil Society Meeting, held in Tegucigalpa, Honduras, on 5 November, SEC/ATI participated in the panel on *“Open Data: A Tool for Civil Society,”* which provided a space to reflect on the opportunities and challenges that open data and technology present for civil society organizations, as well as to share tools that will allow them to maximize the value of their projects. In the framework of this annual event, the Policy was also promoted via materials provided to the organizations participating in the meeting.
- 2.12 As part of the panel on open data, SEC/ATI, together with the Knowledge and Learning Sector (KNL), launched a survey soliciting feedback from the meeting participants on the degree to which their organizations are using open data. Of the survey respondents, 62.4% indicated that their organization was using open data as part of its work and 59.3% indicated that stakeholders/clients of their organization were also using it. These findings, along with other initiatives associated with open data, will help strengthen the agenda with civil society.

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9 Open data is purpose-driven data that is accessible in accordance with its technical and legal characteristics and can be freely used, re-used, and redistributed by anyone, anytime, and anywhere.



*The Publishers from the Vice Presidency for Private Sector and Non-Sovereign Guaranteed Operations (VPP) participated in the training, “Gaining skills on classification and disclosure of public documents,” May 2015.*





## Chapter 3

# INTERNAL IMPLEMENTATION ACTIVITIES

### A. TRAINING

- 3.1 In order to provide Bank staff with effective tools that help them better understand and apply the Policy, training workshops continued to be offered in 2015. The training focus in 2015 was on Publishers, and 14 sessions of a workshop titled *“Mastering the Classification and Publication of Documents on the Internet”* were offered for this group, including four sessions presented via Webex in the Country Offices.
- 3.2 Also in 2015, training sessions for new Bank employees and interns, specialized workshops for various departments and units, and onsite workshops for Country Office personnel in Mexico, Honduras, Barbados, and Chile were held.
- 3.3 **Table 3** lists the training events that were held in 2015:

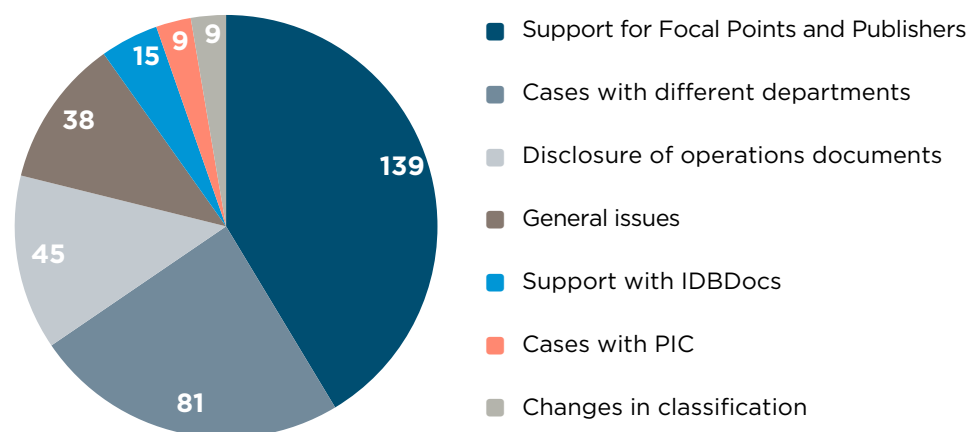
**Table 3:** Training workshops 2015

Title	Venue	Number of participants
“Mastering the Classification and Publication of Documents on the Internet”	Headquarters	149
“Mastering the Classification and Publication of Documents on the Internet”	Webex	65
Access to Information Policy: “A session for the entire Bank”	Webex	13
Specialized training with departments	Headquarters	120
Training on the Access to Information Policy with the Country Offices	Onsite	85
Session on the Access to Information Policy with new Bank employees and interns	Headquarters	221
Training with civil society organizations	Video conference	40
Session for new members of the Board of Executive Directors	Headquarters	20
Outreach workshop with the Caribbean Development Bank	Barbados	10
<b>Total</b>		<b>723</b>

## **B. ACCESS TO INFORMATION HELP DESK**

- 3.4 The help desk assists Bank staff with issues related to the Policy, its application, and technical aspects of implementation. This service runs on an automated system that tracks internal inquiries using the Open-source Ticket Request System (OTRS) modality. Since the service was introduced, requests for technical assistance from the help desk have been on the rise, and the service has been very positively reviewed by Bank staff.<sup>10</sup> In 2015, the help desk received 336 inquiries in the subject areas indicated below in **Figure 3**, a 20% reduction over the previous year (419 in 2014), which reflects a better general understanding of the Policy and its application among staff. The area receiving the largest share of inquiries, with 41% of the total, corresponded to support for Focal Points and Publishers on implementation issues. This is an interesting figure inasmuch as it represents an increase of 7% over 2014 in this area, reflecting greater demand for technical assistance among key internal stakeholders in the implementation process asking more complicated questions about how to apply the Policy.
- 3.5 It is important to note that no inquiries were received in 2015 on use of the Departmental Classification Instructions with regard to document classification. This suggests greater involvement by staff responsible for classifying documents correctly in accordance with the aforementioned instructions. This has helped to raise awareness among key staff on the importance of using this tool and to improve knowledge on how to apply the Policy.

**Figure 3:** ATI- ATI Help Desk Internal Inquiry Tracking System



<sup>10</sup> In a survey administered by the Office of the Secretary in December 2015, 90% of respondents (members of Management) indicated that they had a “good” or “very good” impression of the quality of technical assistance received from the help desk.

## C. SYSTEMS

### 1. Information request tracking system

- 3.6 In 2015, concerted efforts were made to monitor the performance of the OTRS based system for tracking information requests, established in May 2014. The purpose of this system is to enhance the efficiency with which information requests from the public are handled. With this system, all requests received at Bank headquarters are channeled via an online form.
- 3.7 The system can be used to track requests and ensure timely response.<sup>11</sup> And 2015 marked the first year in which it was fully operational, which meant that system performance could be evaluated and areas of improvement identified. Regarding the latter, efforts were made to improve coordination between the different Vice Presidencies in order to respond within the designated time frames to requests for historical information, for which a procedure was established.<sup>12</sup> Complementarily, each representative (agents) from the various Vice Presidencies received training in September 2015 on how to use the system to process information requests, and a working group was created to meet monthly to coordinate progress and other emerging challenges. Improved coordination between the various actors is expected to enhance the efficiency with which these types of requests are resolved.
- 3.8 The OTRS-based system can generate reports with interesting data on requests for information. For example, in terms of compliance with the time frames for responding to requests, the system can calculate the average time it takes to close out an information request. **Table 4** below contains a breakdown by subject matter of the average time in days that it took to respond to information requests in 2015. The overall average response time for all requests in 2015 was 11 calendar days.
- 3.9 In order to move forward with the consolidation of a single system for processing information requests received by the Country Offices, in 2015 several representatives of the Public Information Center in the Country Offices were approached to learn about how the process of responding to information requests works in each country. A centralized system for all requests received by the IDB would not only bring greater efficiency to the response process but also contribute to accountability at the Bank.

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11 In accordance with the Policy, the Bank should endeavor to provide a response to an information request within 30 calendar days, or within 45 calendar days in the case of requests for historical information.

12 Although the permissible time for responding to requests for historical information is 45 calendar days, the nature of these requests, which often involve tracking down very old information and consulting with several departments in the case of sector-related subject matter, makes smooth coordination all the more necessary if the deadline is to be met.

**Table 4:** Average number of days to respond to a request

Subject matter	Average response time (days)
Access to grants	10
Access to loans	11
Job opportunities	7
Education	13
Environment and agriculture	12
Health	15
Infrastructure	12
Institutional capacity	12
Finance	10
Micro, small, and medium-sized enterprises	10
Integration and trade	13
Private sector development	10
Procurement opportunities	8
Research and data	15
<b>Overall average</b>	<b>11</b>

## 2. Development of new systems

- 3.10 As indicated in the 2014 report, having better integrated systems in place to bring greater efficiency to the disclosure of information is an important challenge and one that is being addressed as part of the development of ezShare, the new document management system that will replace IDBDocs, and the Convergence platform.<sup>13</sup>
- 3.11 In 2015, SEC/ATI participated in discussion and working groups for development of the ezShare system. This new system is part of the BID365 program and will use the SharePoint platform as an information management tool. A good part of these efforts focused on the Policy requirements to create a workflow (ATI workflow) for publishing documents under the new ezShare system.
- 3.12 The workflow for disclosing information, both operational and nonoperational, should be more efficient and user-friendly, especially for Authors and Publishers. With this in mind, there are plans to create reminders and checklists of specific tasks on a system dashboard, which can be expected to improve compliance with disclosure times, reduce the

<sup>13</sup> Convergence is an operations management tool at the Bank.



backlog of documents for publication,<sup>14</sup> and more accurately monitor the classification of information under one of the three categories established in the Policy. The ultimate objective of ezShare is to make it easier to search for information, lower the costs associated with use of different systems for creating and storing information, and further reduce the security risks involved in information management.

- 3.13 Complementarily, work will continue in the framework of Convergence to establish a series of prerequisites that must be met before proceeding with the next steps of operations management<sup>15</sup>.
- 3.14 With respect to the Convergence platform, SEC/ATI continued to participate in the various working groups to set Policy requirements relating to the project cycle, at both the preparation and execution stages. The emphasis was on the importance of timely disclosure, issues related to confidentiality or objections that counterparts may have to the simultaneous disclosure of some documents, and the various ways of conveying to the project teams the obligation to publish information within the system. In addition, in line with the functionalities of Convergence, changes to the new automated system for monitoring compliance with publication time frames have been proposed and are currently being developed so that reports can be generated on the publication status of documents in the project cycle. The improvements will also enable integration of these features with other Bank systems, make it easier to filter data, and ensure that other types of documents can be included on the Convergence platform in the future.
- 3.15 SEC/ATI also continued to participate in all activities of the BID365 Stakeholders Committee in 2015, for the purpose of monitoring progress and implementation of the new tools. It has advocated the importance of establishing guidelines and a clear set of rules on how the systems and associated tools should be used, and it continues to work towards that objective, in order to create a governing framework that reflects a shared vision at the IDB on how to manage Bank information.

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14 An average of 500 documents classified as public by the authors are generated on a monthly basis, and in the case of these documents the Publishers must verify the public profile and then authorize publication on the Bank's external website. Considering that the system as it is currently configured is not set up to send reminders/messages to Publishers to proceed with publication, nor does it have a dashboard with a checklist of tasks for publication, publishing these documents takes time and requires ongoing monitoring by SEC/ATI.

15 This will be supplemented by reminders and checklists of specific tasks for publication that will be built into the dashboard.

#### **D. STAKEHOLDERS (FOCAL POINTS AND PUBLISHERS)**

- 3.16 The Focal Points<sup>16</sup> have played an essential role, not only disseminating information about the Policy but also contributing significantly to greater coordination with the various departments and units on the Policy implementation process. In order to deepen this relationship, SEC/ATI collaborated with the Focal Points in 2015 to create work plans that identified specific tasks/actions to ensure compliance with the Policy in the respective department.<sup>17</sup> This initiative involved the participation of 34 departments to acquaint their chiefs with the activities to be carried out under each plan. In addition, more than 60 bilateral meetings were held with these individuals to address specific issues.
- 3.17 For their part, Publishers continued to play an active role in the disclosure of documents. In 2015, in a continuation of the trend of recent years, over 16,000 documents were classified either as public or to be disclosed over time, which is a significant volume of information that is being made available to the public on the Bank's external website. With this in mind and in order to keep Publishers up to date on the use of tools for disclosing information, specialized training workshops were held for them in 2015 on the process of disclosing information using IDBDocs, a document management system. In 2016, Publishers will receive training in the ezShare system,<sup>18</sup> which will replace IDBDocs.

#### **E. ACCESS TO INFORMATION COMMITTEE (AIC)**

- 3.18 As part of its duties to supervise implementation of the Policy, the Access to Information Committee (AIC) held two meetings in 2015. At an onsite meeting in June 2015, it convened to learn about the implementation progress made in 2014 and the activities to be carried out by Management in 2015. A second, virtual meeting was held to approve the fifth update of the Departmental Classification Instructions, an essential staff support tool for document classification.
- 3.19 To date, the AIC has not been asked to conduct any reviews of information requests denied by the Bank on the basis of one or more of the exceptions to disclosure established in the Policy. The AIC is the entity in charge of conducting the first-stage review of these types of requests.

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16 In 2015, there were 41 Focal Points at the department level, including five for the 26 Country Offices and one for each Country Department. Following consolidation of the Bank's four private-sector windows into the IIC in 2016, the number of Focal Points fell to 38.

17 Some of the tasks included in the work plans include review and update of the classification of documents, publication of documents, and Policy dissemination and information activities.

18 This system is expected to become fully operational in 2016.

## **F. EXTERNAL REVIEW PANEL**

- 3.20 The second-stage review of information requests that have been denied is to be conducted by an External Review Panel consisting of three independent members of the Bank. To date, this Panel has not been required to meet as no requests for this type of review have been received.<sup>19</sup> However, from the Panel's inception, its members have participated in activities designed to keep them informed about the Policy implementation process as well as acquaint them with updates of procedures and systems, the application of other policies, and Bank operations in general.
- 3.21 In November 2015, the Panel members visited Bank headquarters and received an update on the implementation tasks that were being carried out. The Panel met with the Records Management Section (ACP/REC), which gave a presentation on ezShare and eArchives. In addition, it met with KNL to learn about the Bank's activities in the area of open data. The Panel also met with the Independent Consultation and Investigation Mechanism to hear about the new policy approved by the Bank for this mechanism. Lastly, the Panel members had a meeting with the President and the Secretary of the Bank.

## **G. DISSEMINATION AND PROMOTION OF THE POLICY**

- 3.22 Dissemination and promotion activities are key to raising awareness among staff about the importance of the Policy as a tool for enhancing the Bank's transparency vis-à-vis its stakeholders. On 28 September 2015, for the first time ever, the Bank celebrated International Right to Know Day, hosting a variety of activities at Headquarters that were well attended by staff. Two notable events that day were the "Profiles Campaign," which disseminated messages related to the celebration and the importance to the Bank of promoting access to information about its activities, and a "lightning talks" event with eight speakers from various organizations,<sup>20</sup> who shared their experiences and the work carried out daily by their institutions in the areas of access to information, transparency, and accountability.

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19 In accordance with the terms of reference for the Panel, members are appointed to three-year terms, renewable for up to a maximum of six years. The Board of Executive Directors approved renewal of the terms of the current members of the Panel for an additional three years on 6 October 2015.

20 Sunlight Foundation; Disaster Accountability Project; Brookings Institution; Organization of American States (OAS); Washington Post; Open Society Justice Initiative.

*President Moreno meets with members of the External Review Panel for the Access to Information Policy in November 2015. From left to right: Mauricio Merino, Ximena Abogabir, Luis Moreno and Toby Mendel.*



- 3.23 The day’s celebration also included a panel discussion on “What Does the Right to Know Mean Today?” which was an occasion for sharing thoughts, trends, and good practices relating to the implications and meaning of access to information and accountability, particularly from the standpoint of international development institutions.<sup>21</sup> Lastly, with the aim of sharing this celebration with the IDB’s external audience, a blog post on the right to know was published.
- 3.24 Along these same lines, a panel discussion was held on “Transparency in Chile: Progress, Experiences, and Challenges for the Future.” The event, which was also well attended by Bank staff, provided an opportunity to share the Chilean experience with transparency and access to information as well as progress achieved in the area of legislative transparency. Bank

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<sup>21</sup> The panel was moderated by Cynthia J. Arnson of the Woodrow Wilson Center and included Mariana Mas of the Open Society Justice Initiative, Toby McIntosh of the Freedom of Information Advocates Network (FOIANet), and Jonathan Fox from American University. Luis Giorgio, Chief of Staff of the Office of the Presidency and Chair of the Access to Information Committee, provided the opening remarks.



support for improving transparency in Latin America and the Caribbean was also discussed.

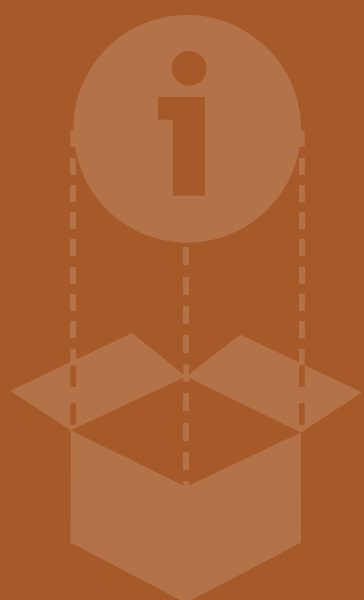
- 3.25 In 2015, the IDB continued to pursue its data transparency initiatives, including regular publication of information on its operations through AidFlows and the International Aid Transparency Initiative (IATI). The result of a partnership between the IDB, the World Bank, the Organization for Economic Cooperation and Development, and other regional development banks, AidFlows visualizes development financing flows from the perspective of both donors and beneficiaries. IATI provides a unified standard for publishing information on development projects, giving users access to comparable data from different partners for development in a single format in one location. The IDB publishes current data on both platforms every quarter.
- 3.26 In 2015, the Bank made a series of improvements to its data for the IATI, including the addition of information on project results and more detailed information on budget and disbursement projections, all in the form of data. These improvements were recognized by the nongovernmental organization Publish What You Fund in its 2016 Aid Transparency Index, which ranked the IDB as 7th among 46 of the largest development and donor organizations in the world that were included in the index. The IDB improved its score by 11 percentage points (85.6%) over 2014 (73.9%) and placed among the organizations deemed to have fully met the Busan aid transparency commitment.<sup>22</sup> The IDB was also recognized as a leader in the publication of institution-level planning information, project documents, and information on project performance.
- 3.27 Lastly, as part of its internal/external dissemination activities, the Bank published a new Access to Information Newsletter in December 2015, which is available at: [www.iadb.org/access](http://www.iadb.org/access).

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22 Busan Partnership Agreement, Article 23(c), Fourth High-level Forum on Aid Effectiveness, 2011.



*Participants in the panel discussion “What does the Right to Know mean today?” celebrating International Right to Know Day, September 2015. From left to right: Marcelo Cerna, Chief, Access to Information Section; Toby McIntosh, Freedom of Information Advocates Network (FOIANet); Luis Giorgio, Chief of Staff of the Office of the Presidency and Chair of the Access to Information Committee; Jonathan Fox, American University; moderated by Cynthia J. Arnson, Woodrow Wilson Center; and Mariana Mas, Open Society Justice Initiative.*



### A. DISCLOSURE OF INFORMATION ON OPERATIONS

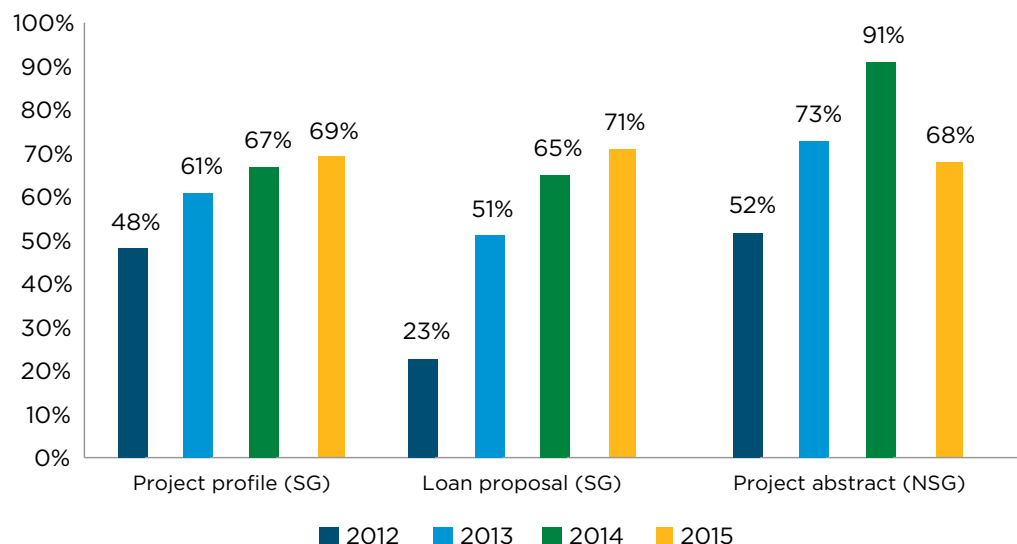
- 4.1 In 2015, the level of compliance with publication time frames for key documents continued to be verified by manual review.<sup>23</sup> This review focused on project profiles and loan proposals for sovereign guaranteed operations approved during the year. The review also included project abstracts of non sovereign guaranteed operations approved that year.<sup>24</sup> As illustrated in **Figure 4** (below), the positive trend continued in 2015 in terms of compliance with publication time frames for these types of document. However, the ultimate objective of full compliance underscores the need to have integrated systems in place that bring greater efficiency to the publication of information. The changes that the Bank is introducing in the form of new systems and requirements implementing the Policy are expected to make this objective attainable in the short term. Complementary to these actions, creating greater awareness among staff about the importance of complying with the Policy is another activity to be pursued as an ongoing part of the implementation process.

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23 To determine whether these documents were disclosed within the time frame set by the Policy, SEC/ATI calculated the time elapsed between the approval date of the respective document in the case of project profiles and project abstracts, or the distribution date of the respective document to the Board in the case of loan proposals (documents for simultaneous disclosure), and the authorization date in IDBDocs for Internet publication of the document was calculated.

24 In 2015, the Bank approved a total of 168 operations. Of these, it has been confirmed that project profiles were not published in the case of 14 because they were programmatic operations, multi-phase operations, or operations subsequent to the first in a CCLIP.

**Figure 4:** Compliance with publication time frames



## B. DISCLOSURE OF INFORMATION ON PRIVATE SECTOR PROJECTS

- 4.2 In the framework of the recommendations made by the Office of Evaluation and Oversight (OVE) as part of the midterm evaluation of commitments arising from the Ninth General Increase in the Resources of the Bank, Management reported having fulfilled the recommendation to explore alternatives for greater disclosure of the results of non-sovereign guaranteed operations, while respecting the confidential nature of private information.<sup>25</sup> As indicated in the 2014 annual report,<sup>26</sup> strides were made in this area in the context of the private sector reform implemented in 2015.<sup>27</sup>
- 4.3 As a result of consolidation of the IDB Group's non-sovereign guaranteed activities into the Inter-American Investment Corporation (IIC) as of 1 January 2016, a working group led by SEC/ATI with VPP and ITE participation was

25 The three recommendations made by OVE were fulfilled and reported in the Evaluation Recommendation Tracking System (ReTS).

26 Further headway was made in improving the guidelines for document classification for non sovereign guaranteed operations and MIF operations; there was better coordination between windows; and an inventory was taken of documents, media, and products that disclose project results. In addition, the Vice Presidency for Private Sector and Non-Sovereign Guaranteed Operations (VPP) prepared a consolidated report on private sector activities titled "Private Sector with Purpose: Stories of Development." This report was published in December 2014 and serves the purpose of publishing the results of projects and lessons learned from all four private sector windows.

27 In the framework of consolidation of the IDB Group's private sector windows, the Policy and Evaluation Committee of the Board of Executive Directors (PEC) suggested taking into account the experience and knowledge acquired by the Bank during implementation of the Access to Information Policy when setting the respective policy for the New Corporation.



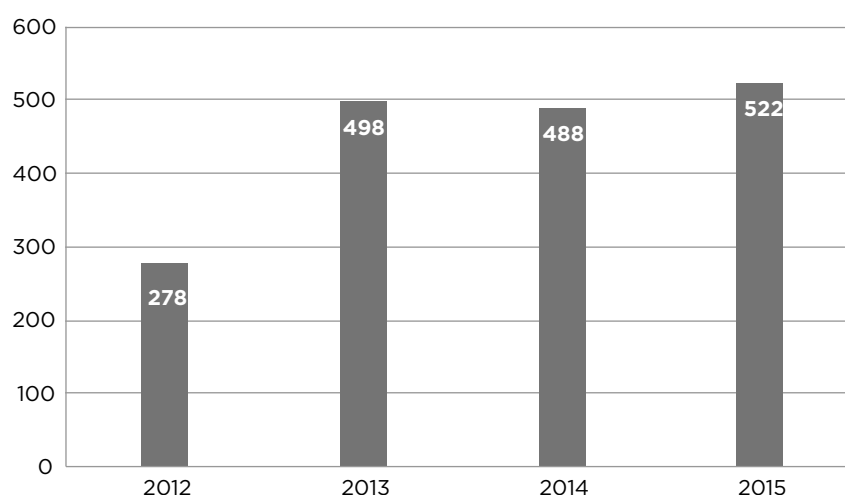
formed in late 2015 to address the disclosure of documents related to non-sovereign guaranteed IDB legacy operations that would be transferred in January 2016 for administration by the IIC.<sup>28</sup> The objective was to ensure that the information on these operations that had already been made available to the public through the IDB website would remain available and that the project teams would be able to continue making the corresponding updates.

- 4.4 In 2016, continuing efforts will be made to develop detailed internal procedures for publishing and updating information on IDB legacy operations. Support will also be provided to help the IIC implement the processes for publishing information on operations subject to cross-bookings.

### C. DISCLOSURE OF BOARD-RELATED INFORMATION

- 4.5 The disclosure of information related to the Board of Executive Directors is valuable for the Bank's external audience inasmuch as it allows the IDB not only to maximize access to information but also to help enhance the level of transparency in its decision making process. Board-related information includes Board agendas, minutes, and reports from the committee chairs, as well as the resolutions adopted by the Board, which are available at: <http://www.iadb.org/en/about-us/resolutions-adopted-by-the-board-of-executive-directors,20047.html>. **Figure 5** (below) shows the volume of Board documents disclosed from 2012 to 2015.

**Figure 5:** Board documents disclosed to the public



Source: IDBDocs

28 As indicated in paragraph 3.39 of the Regulations for Cross-bookings between the IDB and the IIC (document GN-2823-2), "[...] the operations in the IDB Legacy Portfolio shall continue to be subject to the IDB cross-sectoral policies." These policies include the Access to Information Policy.

## **D. DISCLOSURE OF INFORMATION ON THE ANNUAL MEETING OF THE BOARD OF GOVERNORS**

- 4.6 The Board of Governors is the Bank's highest decision-making body. In this regard, the resolutions approved by the Board of Governors in the framework of the Annual Meeting held in Korea in 2015 were made available to the public on the Bank's external website within the time frame established by the Policy.<sup>29</sup>
- 4.7 The electronic link included in this section lists the resolutions adopted at the Annual Meeting of the Board of Governors: <http://www.iadb.org/en/about-us/resolutions-adopted-by-the-board-of-governors,20041.html>.

## **E. DISCLOSURE OF HISTORICAL INFORMATION ([eArchives](#))**

- 4.8 The disclosure of historical information is important for the Bank because it contributes to enhancing the institution's transparency and makes valuable information available to the public on IDB activities since the institution's inception. Through eArchives, the Bank has made over 100,000 operational and nonoperational documents available to the public.
- 4.9 For information that is not available on the eArchives website, an information request can be submitted. In 2015, the Public Information Center (PIC) received 47 requests for historical information, which led to the publication of 538 historical records (see **Electronic Link 3**). Most of these were loan proposals, technical cooperation plans of operations, project completion reports, consulting reports, and environmental impact assessments.
- 4.10 It should be noted that the number of requests for this type of information rose by 293% over the previous year (16 requests in 2014). Following the launch of the eArchives website by the Records Management Section (ACP/REC), demand for historical information has been steadily increasing, enabling the Bank to share with its external stakeholders not only valuable institutional information but also the knowledge that the Bank has transferred to the region through its operations over the past 56 years.

## **F. EXCEPTION TO DISCLOSURE OF "COUNTRY-SPECIFIC INFORMATION"**

- 4.11 Under the "country-specific information" exception, the Bank may not disclose information contained within certain country-specific documents produced by the Bank if such information has been identified in writing by the relevant country as confidential or potentially damaging to its relations with the Bank. Application of this exception involves the partial or full nondisclosure of information.

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29 Routinely disclosed documents should be published within five business days following their approval or consideration.

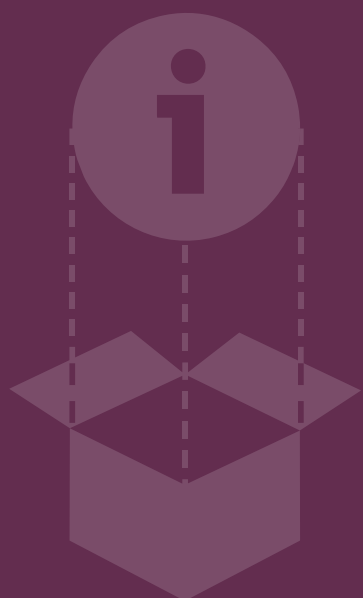
- 4.12 In 2015, this exception was invoked with respect to three sovereign guaranteed loan operations. In the case of two of these operations, full nondisclosure of the loan proposal was requested; in the case of the third, nondisclosure of an electronic link in the proposal was requested. However, it should be noted that in the first two cases, nondisclosure was requested temporarily until an administrative decree was issued and published in the borrowing member country, and once that condition had been verified as fulfilled, the Bank proceeded to disclose the respective loan proposals.<sup>30</sup> In the third case, the information remains confidential.
- 4.13 The countries took recourse to this exception fewer times in 2015 than in 2014, when the exception was invoked in the case of seven operations.

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<sup>30</sup> In accordance with the Policy Implementation Guidelines, in these two cases, the Bank prepared and published a summary that had been agreed upon with the country, as well as a nondisclosure notice informing the public of the confidentiality invoked. Likewise, the Board was informed of this situation via a note that was included in the loan proposal at the time of distribution.



*Marcelo Cerna, Chief, Access to Information Section, introduced the Access to Information Policy to new employees of the Bank in October 2015.*



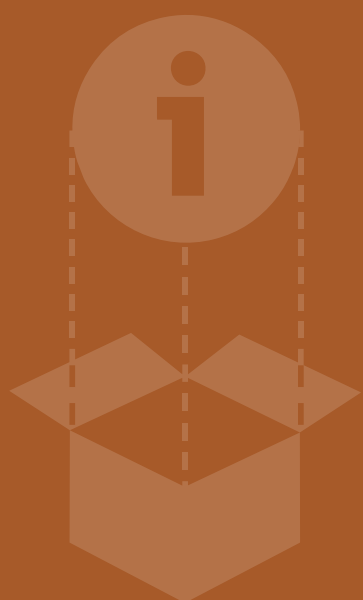
# DISCLOSURE PRACTICES OF BORROWERS

- 5.1 Section 5.2 of the Policy provides that the disclosure practices of borrowers with respect to environmental and social assessments related to Bank-financed projects will be reviewed.
- 5.2 In 2015, the Board approved 7 category “A” projects and 40 category “B” projects. The majority of these projects required disclosure of environmental impact assessments (EIAs) or other environmental and social evaluations by the borrower. For the category “A” and “B” projects that required EIAs, these assessments were disclosed by the borrowers via the websites of the respective ministries, a national newspaper, or other public venues, in accordance with the information provided by the respective Project Team Leaders and the information contained in the Environmental and Social Management Reports (ESMR) for these operations. Likewise, for the category “B” projects that required other types of environmental or social evaluations, the information was disclosed by the executing agency, using these same disclosure channels. Furthermore, in the case of projects that due to their nature or the execution status of their works required disclosure over time of environmental information, such disclosure was to proceed in accordance with the Bank’s Environment and Safeguards Compliance Policy and Access to Information Policy. In addition, it is important to recall that the respective borrowing member countries have internal regulatory frameworks that require them to disclose environmental information.





*The “Transparency in Chile: Progress, Experiences and Challenges for the Future” event, held in April 2015, convened a high attendance of Bank staff and discussed the Chilean experience on transparency and access to information, as well as sharing progress on parliamentary transparency.*





# ACCESS TO ENVIRONMENTAL INFORMATION ON DEVELOPMENT PROJECTS OF INTERNATIONAL FINANCIAL INSTITUTIONS (IFIS)

- 6.1 In line with section 11.1 of the Policy, this chapter takes a look at the rules for disclosing environmental information on development projects at various IFIs, which through their applicable policies seek to maximize access to information and promote citizen participation.
- 6.2 Access to public information has been consolidated in recent times as a fundamental right of every democratic society. At present, more than 100 countries in the world have access to information laws, and many others are in the process of enacting such legislation.<sup>31</sup> By exercising this right, citizens have been taking an increasingly participatory role in the decision-making processes of their governments, while also helping to identify solutions to problems affecting them and their communities, as well as society in general.
- 6.3 Participatory citizens play an essential role in matters that affect the immediate environment in which they live. In effect, every person has the right to live in an environment adequate to his or her health and well-being, as well as the duty to protect and improve the environment for the benefit of present and future generations. Adequate access to public environmental information along with citizen participation in decision-making processes “enhance the quality and the implementation of decisions, contribute to public awareness of environmental issues, give the public the opportunity to express its concerns, and enable public authorities to take due account of such concerns.”<sup>32</sup>

31 See Inter-American Development Bank. Access to Information Policy Implementation Report 2014. Chapter V, paragraph 5.1.

32 [Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters](#), Aarhus, Denmark, 25 June 1998.

- 6.4 This two-way interaction between governments and their citizens<sup>33</sup> is reinforced in the framework of development projects financed by IFIs, which through their information and environmental safeguard policies establish express obligations regarding the disclosure of environmental information and participation in decisionmaking through public consultation. In so doing, the IFIs, as institutions that handle public resources, help to promote accountability and transparency in the area of sustainable development.
- 6.5 Beyond the individual countries' internal legislation and in compliance with the policies governing IFI operations, the governments and the IFIs are required to disclose environmental information, in most cases prior to decision-making on projects. Every IFI has specific regulations in place on the conditions under which project-related key environmental documents are subject to disclosure.
- 6.6 The borrowers are the party responsible for publishing the environmental impact assessment (EIA or ESIA) or other relevant environmental studies, depending on the environmental impact classification category of the operation in question, as well as certain environmental impact mitigation plans. In general, these documents are also made available to the public by the IFIs.
- 6.7 Meanwhile, the IFIs are responsible for disclosing their own analyses with respect to the environmental information received from the borrowers. They produce an ESMR or other equivalent reports, while also publishing the loan proposal documents for the operations, either in full or in the form of an abstract, with the corresponding environmental information.
- 6.8 An analysis of these two types of information—information for which borrowers are responsible and information for which IFIs are responsible—reveals that in general, the policies of the IFIs<sup>34</sup> explicitly regulate the timing of disclosure of the EIAs or ESIA for operations that may cause significant negative environmental impacts,<sup>35</sup> either by setting a minimum time frame for disclosure, as in the case of the African Development

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33 Most countries have explicit environmental legislation at the local level that establishes obligations with respect to disclosure, so citizens have internal sources of information that are supplemented by the information disclosed by the IFIs.

34 For this IFI comparative exercise, only the information and environmental safeguard policies of these institutions were considered.

35 Category "A," "I," or "IV," depending on the classification used by the institution.

Bank (AfDB),<sup>36</sup> the Asian Development Bank (ADB),<sup>37</sup> the Inter-American Investment Corporation (IIC),<sup>38</sup> and the European Bank for Reconstruction and Development (EBRD),<sup>39</sup> or by establishing a milestone or moment in the operation pre-approval process for disclosure, as in the case of the World Bank,<sup>40</sup> the International Finance Corporation (IFC),<sup>41</sup> the Caribbean Development Bank (CDB),<sup>42</sup> and the Inter-American Development Bank (IDB).<sup>43</sup> Regardless of the method used, most requirements regarding the timing of disclosure tend, in practice, to converge around a period of 120 days prior to approval of an operation, consistent with the Pelosi amendment.<sup>44</sup> It should further be noted that although policies at some IFIs—the ADB and the AfDB, for example<sup>45</sup>—establish time frames for the publication of other environmental assessments, in general the disclosure of these types of assessments, as opposed to the disclosure of EIAs and ESIAAs, is not explicitly regulated.

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- 36 “For Category 1 public sector projects, final and cleared versions of key environmental and social assessment documents (SESA/ESIA, ESMP, and Resettlement Action Plan summaries) are disclosed at least 120 days before Board consideration, and final versions of Category 1 private sector projects are disclosed at least 60 days before Board consideration.” African Development Bank Group. [Integrated Safeguards System. Policy statement and Operational Safeguards](#). December 2013. Operational safeguard 1 – Environmental and social assessment. Disclosure and access to information.
- 37 “ADB shall post on its website the following documents submitted by the borrower and/or client: (i) a draft environmental impact assessment (EIA) report for an environment category A project, at least 120 days before Board consideration.” Asian Development Bank. [Public Communication Policy](#). 2011. Section 51 (i).
- 38 The EIA will be published “[...] at least 120 days prior to the final decision by the Board.” Inter-American Investment Corporation. [Disclosure of Information Policy](#). 1 December 2005. Section III.A.4.
- 39 “[...] a minimum of 60 calendar days prior to consideration of the project by the Board of Directors for private sector projects and 120 calendar days prior to Board consideration for public sector projects.” European Bank for Reconstruction and Development. [Public Information Policy](#). 7 May 2014. Section 3.4.1.
- 40 “Disclose draft EA in a timely manner, before appraisal formally begins, in an accessible place and in a form and language understandable to key stakeholders.” The World Bank. [Table A1 - Environmental and Social Safeguard Policies—Policy Objectives and Operational Principles](#). OP 4.00. July 2005. Section A (11).
- 41 “[...] disclosure of the ESIA should occur early in the environmental and social assessment process.” International Finance Corporation. [Access to Information Policy](#). 1 January 2012. Section 36.
- 42 Environmental assessments are disclosed simultaneously to Board distribution. Caribbean Development Bank. [Information Disclosure Policy](#). Section 3.01 (b), footnote 9.
- 43 The EIA will be “[...] disclosed to the public prior to the analysis mission.” Inter-American Development Bank. [Environment and Safeguards Compliance Policy](#). 19 January 2006. Section B.5. Environmental Assessment Requirements, paragraph 4.19.
- 44 CRS Report for Congress. [Multilateral Development Banks’ Environmental Assessment and Information Policies: Impact of the Pelosi Amendment](#). 12 February 1998.
- 45 “A draft environmental assessment and review framework, where applicable, before appraisal.” Asian Development Bank. [Public Communication Policy](#). 2011. - “at least 30 days before Board consideration.” African Development Bank Group. [Integrated Safeguards System. Policy statement and Operational Safeguards](#). December 2013. Operational safeguard 1 – Environmental and social assessment. Disclosure and access to information.

- 6.9 Regarding the timing of disclosure of the environmental information contained in the reports produced by the IFIs following their assessment of environmental and social impacts, and of the operations documents or summaries of basic information that tend to include environmental information, some IFIs have specific time frames or deadlines for disclosure—IDB, IIC, IFC, World Bank, ADB, and AfDB<sup>46</sup>—whereas others do not expressly stipulate the timing of disclosure in their policies—CBD and EBRD.
- 6.10 In addition to the aforesaid need to ensure that disclosure is timely and to guarantee due exercise of the right of access, the environmental information that is made available to the public should be accessible in terms of both format and language. Institutions including the World Bank stipulate in their policies the need to provide accessible information in a format and language that can be understood by the interested parties.<sup>47</sup> In the case of the AfDB, project information should be disseminated in the area of influence of the project in a timely manner and in a format that is appropriate and intelligible for the local community.<sup>48</sup> In addition to these types of requirements, the ADB stipulates that its project data sheets must be translated into the relevant national languages and made available to the public, both on the institution's website and in the respective countries.<sup>49</sup> Its internal rules also require use of appropriate media for illiterate people.<sup>50</sup> For greater accessibility, the CDB imposes an additional obligation on the borrower to present a “non-technical executive summary” of the ESIA to the public.<sup>51</sup>

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46 The IDB discloses this information simultaneously with its distribution to the Board of Executive Directors. The IIC, for projects with the highest environmental impact classification (category IV), publishes it at least 120 days prior to approval by that institution's Board of Executive Directors. The IFC discloses the information at least 60 days prior to approval by the Board in the case of category “A” projects and at least 30 days prior to approval in the case of all other projects. The World Bank publishes its analysis prior to the start of evaluation of the operation (appraisal). The ADB discloses its project data sheets upon approval of the operation concept document in the case of sovereign guaranteed operations and 30 days prior to consideration by the Board in the case of non-sovereign guaranteed operations. The AfDB makes information from its Integrated Safeguards Tracking System (ISTS) available upon approval of the project concept note.

47 The World Bank. [Table A1 - Environmental and Social Safeguard Policies—Policy Objectives and Operational Principles](#). OP 4.00. July 2005. Section A, paragraph 11.

48 African Development Bank Group. [Integrated Safeguards System. Policy statement and Operational Safeguards](#). December 2013. OS requirements. Project design.

49 Asian Development Bank. [Public Communication Policy](#). 2011. Section 42.

50 Asian Development Bank. [Safeguard Policy Statement](#). June 2009. Appendix 1. Safeguard Requirements 1: Environment. D. Requirements. 3. Information Disclosure. Section 18.

51 Caribbean Development Bank. [Draft Environmental and Social Review Procedures](#). May 2008. Paragraph 4.15.

- 6.11 Similarly, the policy framework at the EBRD emphasizes the need to disclose environmental information on the institution's website as well as at its headquarters and in its country offices, in both the local language(s) and any other language deemed relevant.<sup>52</sup> In addition, when providing information to indigenous communities, its Environmental and Social Policy establishes an express obligation to deliver the information in a culturally appropriate way, respecting collective decision-making rights, and in the language of their choosing, always taking into account the diversity of these communities, as well as their special needs.<sup>53</sup> Thus, environmental information should be available in written, oral, and even audiovisual format, in the appropriate languages for the targeted audience.
- 6.12 Once a project is approved, the IFIs are required to monitor implementation, which creates obligations to provide environmental information at that stage. For example, the IDB's Environment and Safeguards Compliance Policy indicates, "[d]uring execution, affected parties should be kept informed of those project-related environmental and associated social mitigation measures affecting them."<sup>54</sup> The CDB likewise encourages consultations and contact with the affected parties throughout the project cycle.<sup>55</sup> The AfDB, meanwhile, establishes the obligation to ensure the disclosure of environmental information during key moments in the project cycle, through an electronic safeguards tracking system available to the public on its website.<sup>56</sup> The EBRD, too, establishes a specific obligation to keep the ESIA in the public domain for the life of the respective project. The borrower has the obligation to provide information to the interested parties on an ongoing basis, at key moments in the life of the project, as well as whenever changes are made to the project that could cause new adverse impacts, in addition

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52 European Bank for Reconstruction and Development. [Public Information Policy](#). 7 May 2014. Section 3.4.1.

53 European Bank for Reconstruction and Development. [Environmental and Social Policy](#). 7 May 2014. EBRD Performance Requirement 7. Indigenous Peoples. Information disclosure, meaningful consultation and informed participation. Sections 21-23.

54 Inter-American Development Bank. [Environment and Safeguards Compliance Policy](#). 19 January 2006. Section B.6. Consultations. Paragraph 4.20.

55 Caribbean Development Bank. [Draft Environmental and Social Review Procedures](#). May 2008. Paragraph 4.15.

56 "Ensuring progressive disclosure of documents at key stages during the project cycle and making documents available to the public on request, through the Integrated Safeguards Tracking System (ISTS). [...] Environmental and social assessment documents are made public at relevant stages of the project cycle through the ISTS, which is disclosed on the AfDB websites." African Development Bank Group. [Integrated Safeguards System. Policy statement and Operational Safeguards](#). December 2013. OS requirements. Project design.

to the ones initially described.<sup>57</sup> In accordance with its policy, the ADB must make ongoing updates—at least twice per year—to its project data sheets, which include the main environmental considerations. It must also guarantee that interested parties have a right to provide feedback during project implementation or whenever substantive changes are made to the scope of a project.<sup>58</sup>

- 6.13 The importance of disclosing information throughout the implementation of development projects must be underscored as an essential step for ensuring transparency and accountability in those projects. Borrowers and IFIs alike are increasingly moving in that direction.
- 6.14 This notwithstanding, most of the strides made with respect to information disclosure in the context of international and local regulations and the information policies of the IFIs have been in the evaluation stage of projects. In particular, the emphasis has been on taking into account the perspectives of the interested parties when considering the environmental implications of decisions on projects, as a way of enhancing the quality of those decisions.<sup>59</sup> In effect, environmental information is increasingly being disclosed in a timely and accessible manner in terms of format and language, and borrowers and IFIs alike are actively making relevant environmental information on development projects available as a way to achieve greater transparency and citizen participation.

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57 “26. For all projects, the client will provide information to identified stakeholders, on an ongoing basis, appropriate to the nature of the project and its adverse environmental and social impacts and issues, and the level of public interest throughout the life of the project. Additional information may need to be disclosed at key stages in the project cycle, for example prior to start-up of operations, and on any specific issues that the disclosure and consultation process or grievance mechanism has identified as of concern to the affected communities. 27. If there are material changes to the project which result in additional adverse impacts or issues of concern to the affected communities, the client will inform them how these impacts and issues are being addressed and disclose an updated ESMP in accordance with the SEP. If these additional adverse impacts on affected communities are significant, the client may, on a case-by-case basis, be required to carry out additional information disclosure and consultation in line with paragraphs 16 to 20.” European Bank for Reconstruction and Development. [Environmental and Social Policy](#). 7 May 2014. EBRD Performance Requirement 10. Engagement during project implementation and external reporting. Sections 26-27.

58 “Because the PDS is a work in progress, some information may not be included in its initial version but will be added as it becomes available.” “ADB shall update the PDS to reflect the project’s status. Updates will be conducted at least twice a year, and whenever necessary, to reflect activities and issues, progress toward outcome, and implementation progress. If ADB terminates its involvement in a sovereign project or program, the corresponding PDS shall include a statement indicating the reason for the termination.” “ADB shall ensure that the project or program design allows for stakeholder feedback during implementation. ADB shall ensure that relevant information about major changes to project scope and likely impacts is also shared with affected people and other interested stakeholders.” Asian Development Bank. [Public Communication Policy](#). 2011. Sections 42, 44, and 47.

59 European Commission. [Environmental Assessment](#).



6.15 Lastly, it should be noted that despite the real progress that has been made in regulating the disclosure of environmental information, there is still work to be done to ensure more effective access to information. Challenges include the need for public authorities to take a more active role in collecting and disseminating environmental information,<sup>60</sup> as well as the need for active disclosure of information that is more reliable, higher quality, current, and accessible, and in more flexible formats that enable its use, re-use, and redistribution.

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60 United Nations. General Assembly. Report of the United Nations Conference on Environment and Development. [Rio Declaration on Environment and Development](#). Principle 10.



*Barbados COF participates in a training session on Access to Information Policy, November 2015.*



- 7.1 In 2015, progress has continued to be made in implementing the Policy, with efforts focused on moving towards greater disclosure of information and continuing to familiarize Bank staff with the Policy to ensure its correct application.
- 7.2 In 2016, the introduction of the new systems being developed by the Bank will provide an opportunity to make the disclosure process more efficient and make information more accessible.
- 7.3 Also in 2016, there are plans to develop additional internal procedures to increase the effectiveness of disclosure, consolidate relationships with external stakeholders concerning use of the Policy, and promote the usability of information through open data.





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