We refer to your communication dated May 23, 2019 concerning the request associated with the subject identified above.

As described in the Decision dated May 1, 2019, the Access to Information Policy’s Classification and Declassification System and Review Process (the “Review Process”[[1]](" \l "_ftn1)) details two bases for review by the AIC:

“4.2 Eligibility.  If denied access to Information by the Bank, a requester may seek review of the decision pursuant to the process described below, if eligible.  A request or review is eligible if the requester presents in writing a supported statement that:  (a) The Bank’s denial restricts the requester’s access to Information that would normally be disclosed under the Policy; or (b) The Information to which access has been denied falls under the corporate administrative Information, Deliberative Information, or financial Information exceptions, as defined under Sections 4.1 f, g, and h of the Policy; and that Disclosure of such Information would generate substantial benefit outweighing any potential harm, thereby warranting an override of the Policy. “

We note that the Bank’s denial would not qualify as eligible for review under section 4.2(a) of the Review Process, as quoted above.  As communicated to you in the Decision dated May 1, 2019:

“The Access to Information Policy, as approved by the Board of Executive Directors, lists certain categories of information that will not be publicly disclosed.  The Access to Information Committee (AIC) noted that Annex I to the Access to Information Committee expressly excludes “Personal Information,” including “information on salary and benefits [of] the staff of the Bank,” from public disclosure.  This exclusion is reiterated in other Bank regulations such as The Access to Information Policy’s Classification and Declassification System and Review Process (the “Review Process”[[2]](" \l "_ftn2)) and the Access to Information Policy’s Implementation Guidelines (the “Guidelines”[[3]](" \l "_ftn3)).”

The requested Information would not “normally be disclosed under the Policy”.  Therefore, the request is not eligible for review by the AIC and is ineligible for any further consideration.

We also take note of your express confirmation that it was not your intention to request that the Access to Information Committee (AIC) consider an override of the decision to deny the request to disclose “the specific details of IADB top executive compensation/salary”, as further detailed in the request.  Accordingly, we understand that your request for review does not invoke section 4.2(b), as quoted above.

We note your statement that “Other institutions are already making this information public.”  While we will not comment on substance, this general assertion does not provide a basis for appeal or other eligibility for review under the Policy.

Therefore, for the reasons stated in the Decision dated May 1, 2019 and as further explained herein, the denial of the request is ineligible for review by the AIC or an external panel.

[[1]](" \l "_ftnref1)<http://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=35521982>

[[2]](" \l "_ftnref2)<http://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=35521982>

[[3]](" \l "_ftnref3)<http://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=37532979>