

	Public Information disclosure requirements				
<b>Institutional Information</b>	<b>AIIB</b>	<b>European Bank of Reconstruction and Development</b>	<b>Asian Development Bank</b>	<b>World Bank Group</b>	<b>European Investment Bank</b>
<p><b>Board of Governors meetings and level of details to be disclosed:</b></p> <p>AIIB PIIP: 6A EBRD PIP: 1.1 ADB PCP</p>	<p>The meeting will be announced in advance</p> <p>Obligations to publish documents quite limited compared with other MDBs. No board docs, just minutes etc.</p> <p>Comments:</p> <ul style="list-style-type: none"> <li>➤ No descriptive requirement of disclosing meeting agendas;</li> <li>➤ Disclosure not time-bound</li> </ul>	<p>Advanced postings of upcoming Board meetings to discuss the following:</p> <ul style="list-style-type: none"> <li>○ Country strategies</li> <li>○ Sector strategies &amp; policies</li> <li>○ Projects <ul style="list-style-type: none"> <li>- Projects to be discussed by board will be posted, with a link to project summary page on the bank's website.</li> </ul> </li> <li>○ Frequency of disclosure: monthly</li> </ul> <p>The Board of Governors delegates most powers to the Board of Directors, who are resident in the London HQs and have bi-monthly meetings</p>	<p>Simultaneous disclosure of the majority of Board documents to the public upon disclosure to the Board.</p> <p>Verbatim transcripts of Board meetings may also be disclosed after 10 years, provided they do not contain or refer to any information that falls within the policy exceptions.</p>	<p>General rule: B1. The Bank allows access to any information in its possession not on a list of exceptions.</p> <p>Section III B 3. routinely available: Agendas of the Development Committee. communique and announcements; statements and declarations submitted by members; and reports, papers, notes and other documents prepared by Bank staff.</p> <p>BoD: Section III B 4.(b) Board Papers distributed for discussion or consideration (decision), once they are finalized: Operational policy papers and sector strategy papers following a public consultation process.</p> <p>ii. Country assistance strategy papers, project appraisal documents, and program</p>	<p>General rule: the EIB is committed to regularly publish information regarding its role, policies and operations in a timely fashion. And: 5.1. a "All information and documents held by the Bank are subject to disclosure upon request, unless there is a compelling reason for non-disclosure."</p> <p>BoD: Advanced postings of upcoming board meetings not mentioned. Even The general rule is met with advanced postings of board meetings and agendas. Not specified in the policy..</p> <p>BoD: project summaries are published three weeks before approval. (there are exceptions though, not specified)</p>

				documents, if the member country consents to such early disclosure.	
<b>Board minutes</b> AIIB PIIP: 6B EBRD PIP: 1.3	Summary BoGs meeting and proceedings (including resolutions) to be published after the annual meeting <b>Comments: Obligations to publish documents quite limited compared with other MDBs. No board docs, just minutes etc.</b>  ➤ No descriptive requirement for disclosing meeting agendas ➤ Disclosure not time-bound	<ul style="list-style-type: none"> <li>○ The names of attendees;</li> <li>○ Record of the approval of the Minutes of the previous meeting</li> <li>○ Titles of the agenda items</li> <li>○ Agreements and decisions reached.</li> <li>○ No content discussion released.</li> <li>○ Some shareholders (US, UK, Canada) officially disclose information on their own vote, annually or upon request, and informally can share information on other shareholders questions raised during the Board discussion.</li> </ul>		Section III B 2. Exceptions i) deliberative information:  Publicly available are the decisions, results, and agreements that result from its deliberative processes, it does not provide access to (A) Verbatim transcripts. And: Section III B 2 List of Exceptions, including: verbatim transcripts, ED and staff statements, 'Green sheets', communications in ED offices, memorandia, informal notes.  Section III B 4.: published after the Board's deliberative process: minutes, summing ups, summary parts of Green Sheets, Annual reports of Board Committees.	General policy is met with a summary of decisions being published after the meeting.
<b>Strategies and policies</b>  AIIB PIIP: Not available EBRD PIP: 2 ADB PCP: 36-41	<b>Not available</b>  In practice, note there is proactive disclosure of draft policies such as the draft energy strategy note for	<b>Countries strategies:</b> <ul style="list-style-type: none"> <li>○ Draft disclosed, followed by</li> <li>○ A 45-day consultation period</li> <li>○ Draft strategies to be translated into French, German, Russian and additional official</li> </ul>	<b>Countries strategies:</b> <ul style="list-style-type: none"> <li>○ Country Partnership Strategies (CPSs), interim Country Partnership Strategies, and Regional Cooperation Strategies (RCSs) schedule under preparation to be posted</li> </ul>	AI Directive: Simultaneous Disclosure for papers that were prepared following a public consultation process and a draft of which has been seen by the Eds.  Section III B 4 (B) papers that	EIB follows up it's general principle by a dedicated section on its website where it publishes its strategies and policies.

	<p>discussion and draft energy strategy</p> <p><b>Comments:</b></p> <ul style="list-style-type: none"> <li>➤ No reference to disclosure of draft strategies and policies</li> <li>➤ No reference to time-bound consultation period for draft policies and strategies</li> <li>➤ No disclosure on the collective comments submitted by CSOs during the draft of Environmental and Social Framework.</li> </ul>	<p>languages in countries of operations</p> <ul style="list-style-type: none"> <li>○ summary of comments on the draft and the bank's responses are released with the strategy</li> </ul> <p><b>Sector strategies:</b></p> <ul style="list-style-type: none"> <li>○ Draft disclosed, followed by a 45-day consultation period</li> <li>○ Draft strategies to be translated into French, German, Russian and additional official languages in countries of operations</li> <li>○ With the approval of the final strategy text, a table with summary of the comments on the draft from stakeholders is released, too.</li> <li>○ <b>Final approval of policies and strategies:</b></li> <li>○ <i>'Report on the Invitation to Comment'</i> (consultation key points) will be published</li> </ul>	<p>online on a rolling basis for consultation preparation</p> <ul style="list-style-type: none"> <li>○ Consultation with stakeholders include Developing Member Country (DMC) governments, development partners, the private sector, and civil society, including NGOs.</li> <li>○ Available drafts of the aforementioned draft and interim CPSs and RCSs to be posted simultaneously as they are presented to the Board, with the exception that in the event that the Country concerned objects, the strategies will be posted upon endorsement by the Board.</li> <li>○ Key documents - including thematic and sector analyses and assessments - used to prepare the CPSs and RCSs to be posted simultaneously as the posting of CPSs and RCSs</li> <li>○ Translation of the CPSs and RCSs within 90 days after endorsement by the Board into relevant national languages</li> </ul> <p><b>Country Operations Business Plans and Regional Cooperation Operations</b></p>	<p>may have involved consultations with affected parties, civil society groups, and other stakeholders are posted before the Board discussion:</p> <p>Country assistance strategy papers, project appraisal documents, and program documents, if the member country consents to such early disclosure.</p> <p>Country assistance strategy papers, project appraisal documents, and program documents, if the member country consents to such early disclosure.</p>	
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Existing sector strategies and policies	<b>Not available</b>	<ul style="list-style-type: none"> <li>· Transport Sector Strategy</li> <li>· Property Sector Strategy</li> <li>· Municipal and Environmental Infrastructure Sector Strategy</li> <li>· Energy Sector Strategy</li> <li>· Mining Operations Policy</li> <li>· Information &amp; Communication Technologies Sector Strategy</li> <li>· Financial Sector Strategy</li> <li>· Agribusiness Sector Strategy</li> </ul>		AI Directive: Most operational information is routinely posted on the website.	The Bank meets the general policy with a section "Key policies and standards on the EIB website"
<b>Project documents</b>		Project Summary Documents (PSD)		AI Directive: <a href="#">project information documents</a> . factual technical documents,	4.5 A <a href="#">Project summary and Environmental</a>

<p>AIIB: PIIP 7.A EBRD: PIP 3.1 ADB: OM/OP 7; PCP</p>	<ul style="list-style-type: none"> <li>○ Detailed documents for Sovereign-Backed Financings</li> <li>○ Summary documents for Non-Sovereign-backed Financings following approval of the Financing.</li> </ul> <p>Comments:</p> <ul style="list-style-type: none"> <li>➤ No descriptive requirement of what 'detailed documents' stand for, neither the level of details in project document.</li> <li>➤ No descriptive requirement of what 'summary documents' are and the level of details applicable to reporting.</li> <li>➤ No reference to disclosure of category A and B projects and</li> <li>➤ No reference to project decision by the Board</li> </ul>	<ul style="list-style-type: none"> <li>❖ A project summary document (PSD) is prepared for each private and public project where approval is sought from the Board of Directors; level of details as follows: <ul style="list-style-type: none"> <li>○ Project company</li> <li>○ Total project cost (where applicable)</li> <li>○ Project location</li> <li>○ A brief description of the project and its objective</li> <li>○ Amount and nature of bank's investment</li> <li>○ Target date for a decision on the project by the Board of Directors</li> <li>○ Anticipated transition impact and for public sector projects, expected transition impact rating</li> <li>○ Summary of environmental and social impacts associated with the project and agreed mitigation measures</li> <li>○ Details of project related technical cooperation funding and grant financing, if applicable</li> <li>○ Guidance on how and where information about the project can be obtained, including contact points for the project sponsor and the EBRD Operation Leader</li> </ul> </li> </ul>	<p><b>Project summary documents for non-sovereign project</b></p> <p>An initial PSD to be disclosed 30 days before the date for Board consideration.</p> <p>Frequency of project document updates: twice a year, on March 31 and September 30 (and whenever necessary, to reflect status of development objectives, implementation progress, and status of operation/construction).</p> <ul style="list-style-type: none"> <li>❖ <b>Category A projects</b> A PSD is posted on the Bank's website 120 calendar days prior to Board decision.</li> <li>❖ <b>Frequency of PSD updates</b> Minimally twice a year on March 31 and September, and whenever necessary to reflect status of development objectives, implementation progress, and status of operation/construction.</li> </ul>	<p>project appraisal documents (after member country consent). Implementation status and result. restructuring papers. Implementation, completion and result report.note on cancelled operations.</p>	<p><b>and Social Impact Assessments and/or Non-Technical Summaries</b> as early as possible in the project cycle.</p> <p>at a sufficiently advanced stage in discussions with a project promoter to commence the project's appraisal prior to a loan proposal going to the Board of Directors. (3 weeks before approval). However the TP states that "a limited number of projects are not published before Board approval and, in some cases, not before loan signature to protect justified interests based on the exceptions to disclosure laid down in this Policy."</p> <p>Intermediary loans published on a project list, links to public register.</p>
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<p><b>Social and Environmental Information (relating to projects)</b></p> <p>AIIB PIIP 7.2, ESP 57-60 EBRD PIP 3.4 ADB OM/OP 18 WB OP 4.01</p>	<ul style="list-style-type: none"> <li>❖ To be posted on bank's website <ul style="list-style-type: none"> <li>○ Draft and final environmental and social assessment reports</li> <li>○ Draft and final Environmental and social management plan and frameworks</li> <li>○ Draft and final Resettlement plans and frameworks</li> <li>○ Draft and final Indigenous Peoples plans and framework</li> <li>○ Banks reviews of the use and corporate systems</li> </ul> </li> </ul> <p>Comments:</p> <ul style="list-style-type: none"> <li>➤ No time-bound requirement for posting either of the 'Sovereign-Backed' and 'Non-Sovereign-Backed' projects prior to consideration of the project by the Board to date (AIIB's first three projects in Pakistan, Tajikistan and Bangladesh refer)</li> </ul>	<p>Environmental and social reports published for public comment or for information on bank's website.</p> <ul style="list-style-type: none"> <li>❖ "Category A" projects Other than required disclosure by projects clients (under the Environmental and Social Policy), the Bank is require to make the following documents available: <ul style="list-style-type: none"> <li>○ Environmental and Social Impact Assessments on Bank's website, its HQ in London and relevant resident offices.</li> <li>○ A minimum of 60 calendar days prior to consideration of the project by the Board of Directors for private sector projects</li> <li>○ A120 calendar days prior to Board consideration for public sector projects.</li> <li>○ For projects located in countries where EBRD does not have a Resident Office, alternative means of disclosure will be identified on the ESIA webpage for the project.</li> <li>○ ESIA's are made available in local language and may be available in whole or in part in other languages, where appropriate.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>❖ According to the ADB's Project Safeguard Policy, the Bank publishes the following <a href="#">environmental documents</a> submitted by borrowers and/or clients: <ul style="list-style-type: none"> <li>○ A draft environmental impact assessment (EIA) report for an environment category A project, at least 120 days before Board consideration;</li> <li>○ A draft EIA report for an environment category A subproject under a sector project or a financial intermediary project, at least 120 days before approval of the subproject;</li> <li>○ A draft EIA report for an environment category A tranche of an MFF, at least 120 days before approval of the periodic financing request;</li> <li>○ A draft strategic environmental assessment for an environment category A program, at least 120 days before Board consideration;</li> <li>○ A draft, or, if available, final initial environmental examination (IEE) for an environment category B project, upon Board approval of the project</li> <li>○ A draft environmental assessment and review</li> </ul> </li> </ul>	<p>AI Directive: safeguards assessments and plans related to environment, resettlement, and indigenous peoples.</p> <p>Disclosed in accordance with OP/BP 4.01, Environmental Assessments:</p> <p>on all Category A and B projects proposed for IBRD or IDA financing, the borrower provides relevant material in a timely manner prior to consultation and in a form and language that are understandable and accessible to the groups being consulted.</p>	<p>in a Public Registry:</p> <ul style="list-style-type: none"> <li>○ the Non-Technical Summary (NTS) of an EIA</li> <li>○ outside the EU, the equivalent of the NTS along with the Environmental and Social Impact Study/Statement (EIS), and</li> <li>○ other relevant documents pertaining to a project's environmental and social performance.</li> <li>○ Environmental and social info is made available through the register.</li> </ul> <p>A non-technical summary of EIA and EIS (Impact study Statement)</p>
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	<ul style="list-style-type: none"> <li>➤ No specificity on when draft and final ESAs, ESMPs, ESMPFs, resettlement plans, RPFs, Indigenous Peoples plans and IPPFs, or other approved forms of documentation are made available, and commenting period.</li> <li>➤ No clear procedures established in the event that Client or the Bank does not disclose sufficient documentation</li> <li>➤ No time-bound requirement for disclosing category A projects prior to consideration by the Board.</li> </ul>	<ul style="list-style-type: none"> <li>○ Notification of the documents' availability will be posted on the EBRD website</li> <li>○ A notification on the EBRD ESIA web page will also list locations of full availability of ESIA documents locally and link to the Client's website or other website as appropriate.</li> </ul>	<p>framework, if required, before appraisal;</p> <ul style="list-style-type: none"> <li>○ The final or updated EIA or IEE, upon receipt thereof by ADB</li> <li>○ Environment monitoring reports, and corrective action plans, if any, prepared during project implementation, upon receipt thereof by ADB;</li> <li>○ In case of a major project change classified as environment category A, a new or updated EIA, at least 120 days before approval of the change; and</li> <li>○ In case of a major project change classified as environment category B, a new or updated IEE, upon receipt thereof by ADB.</li> </ul>		
<p><b>Confidential Information</b></p> <p>AIIB PIIP: C9</p> <p>EBRD PIP: E</p>	<ul style="list-style-type: none"> <li>❖ Broad exemptions across the board. <ul style="list-style-type: none"> <li>A. Personal information.</li> <li>Exemption for staff even if show fraud, corruption or conflict of interest etc.</li> <li>B. Safety and Security</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>❖ Exemptions: <ul style="list-style-type: none"> <li>○ Board documents, unless Board approval for release is given</li> <li>○ Board documents, with the exception on public sectors projects</li> <li>○ Documents relating to the Bank's own</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>❖ Exemptions: <ul style="list-style-type: none"> <li>○ In-confidence information provided to the Bank by a member of international organization and that, if disclosed, would damage ADB's relations with that part or any other member</li> </ul> </li> </ul>	<p><b>Exemptions:</b></p> <p>Section 3 B 2 The Exceptions: The Bank does not provide access to information whose disclosure could cause harm to specific parties or interests. the Bank does not</p>	<p><b>Exemptions:</b></p> <p>in case of undermining:</p> <ul style="list-style-type: none"> <li>- commercial interests of a natural or legal person.</li> <li>- intellectual property</li> <li>- court proceedings and legal advice</li> </ul>



	<p>Withhold for causing threats to environment but not obligation to disclose if does</p> <p>C. Privileged and investigative information</p> <p>How to access information that confirms</p> <p>a) The decisions to internally investigate and evaluate via an independent accountability mechanism; b) the internal investigations and the independent accountability have been conducted; and c) investigation outcomes?</p> <p>D. Third-party information and proprietary information.</p> <p>Broad definition of third party which encompasses all "non-public information", thus potentially risking too wide application of 3rd party info as "non-public".</p> <p>E. Deliberative information.</p> <p>Limited harm test</p> <p>A. Violations of National Laws or Other Applicable Regulations</p>	<p>decision-making processes</p> <ul style="list-style-type: none"> <li>○ Privileged information</li> <li>○ Information which would undermine policy dialogue with a member country</li> <li>○ Information that would violate the law, or prove to be a threat to the national security of a member country (of the Bank)</li> <li>○ Tender and procurement information submitted by bidders</li> <li>○ Proceedings of internal grievance and appeal mechanism, as well as investigations into suspected misconducts, and disciplinary procedures.</li> </ul>	<ul style="list-style-type: none"> <li>○ Information provided by ADB by a party, which, if disclosed would likely damage the commercial and financial interests, and/or competition, as well as business interests of the Bank.</li> <li>○ In-confidence information alleging fraud, corruption or other violations of ADB's Anticorruption Policy</li> <li>○ Whistleblower identity</li> <li>○ Personal information</li> <li>○ Financial information</li> <li>○ Security and safety</li> <li>○ Legal or investigative matters</li> <li>○ Internal audit report and trust fund audit reports</li> <li>○ Historical information dating back more than 20 years</li> <li>○ Public interest override except when confidentiality is breached</li> <li>○ Negative override, to be decided only by the Board: ADB reserves the right not to disclose under exceptional circumstances due to potential harm which outweighs the benefit of disclosure</li> </ul>	<p>provide access to documents that contain or refer to</p> <p>(a) Personal Information.</p> <p>(b) Communications of Governors and/or Executive Directors' Offices.</p> <p>(c) Ethics Committee.</p> <p>(d) Attorney-Client Privilege.</p> <p>(e) Security and Safety.</p> <p>(f) Information Restricted Under Separate Disclosure Regimes and Other Investigative Information.</p> <p>(g) Information Provided by Member Countries or Third Parties in Confidence.</p> <p>(h) Corporate Administrative Matters.</p> <p><a href="#">Section V Waiver</a></p> <p>1. Provisions of this Policy may be waived by the Board.</p>	<ul style="list-style-type: none"> <li>- the purpose of inspections, investigations and audits. disclosure of info and docs collected and generated during inspections, investigations and audits. Even after these have been closed.</li> </ul> <p>refusal if disclosure would seriously undermine the Bank's decision making process.</p> <p>members states may request not to disclose documents, setting out objection by reference to the policy.</p> <p>individual allocations by local banks (FI)</p>
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	<p>No clear definition on whose national law violated.</p> <p>B. Corporate Administration</p> <p>No info about procurement, land, expenses.</p>				
<p>Implementation and monitoring of Public Information Policy or equivalent of.</p> <p>EBRD' Implementation procedural provisions for information requests and appeals'</p> <p>ADB OMP PIP C.</p> <p>EIB Transparency Policy 5.16-5.34</p>	<p>No clear access-to-information procedures</p>	<p><i>Tool: 'Implementation procedural provisions for information requests and appeals'</i></p> <ul style="list-style-type: none"> <li>❖ Making a request for information <ul style="list-style-type: none"> <li>○ A designated contact point available by email, mail, fax, or to the Bank's resident offices.</li> <li>○ Languages: English, Russian, German or French, or any of the official national languages of the Bank's countries of operations.</li> <li>○ Acknowledgement of requests within 5 working days, or no more than 10 days</li> <li>○ Clarification of requests: the Bank can ask the application to provide clarifications</li> <li>○ Decision: A 20-working-day treatment time after the request has been filed, or maximum a response within 40</li> </ul> </li> </ul>	<p>Procedures for Accessing Information</p> <ul style="list-style-type: none"> <li>❖ Proactive disclosure: the Bank's website will be the primary tool for proactively disclosing information and documents as required in the Public Communications Policy</li> <li>❖ Requests for information <ul style="list-style-type: none"> <li>○ All requests for information and documents to be made in writing (email, mail, online feedback form or fax) and directed to ADB's InfoUnit.</li> <li>○ Submission language: English or any of the official or national languages of ADB's members.</li> <li>○ Time-limits for response to requests: acknowledgement of receipt of a request within 5 working days of receiving the request.</li> <li>○ Decision: issuance of a response to requester within 20 working days after receiving the request, with possible extension in the case of a request for historical information, or if</li> </ul> </li> </ul>	<p>AI Directive, Annex1:</p> <p>Proactive Disclosure.</p> <p>requests may be submitted in writing by electronic means, mail, or fax.</p> <p>The Bank acknowledges receipt of written requests for information within five working days, and endeavors to provide a more comprehensive response within 20 working days.</p> <p>Appeals within 60 days after denial access. Considered by AI Committee.</p>	<p>Procedures for Handling Information Requests</p> <ul style="list-style-type: none"> <li>❖ Requests for information <ul style="list-style-type: none"> <li>All information requests can be submitted by both email to EIB's Information Desks or any other form to EIB's office including External Offices.</li> </ul> </li> </ul> <p>Response: within 15 working days following receipt.</p> <p>For complex applications a response should be delivered no later than 30 working days following receipt.</p> <p>Language: the application should be written in one of the Bank's official languages, and the response will be issued in the same language</p> <p>Withholding requested information citing confidentiality: the Bank must inform the reasons for withholding information.</p> <p>In the event of a total or partial refusal the applicant may, within 15 working days of receiving the Bank's reply, make a confirmatory application asking the Bank to reconsider its position.</p>

		<p>working days if a timely explanation for a further delay is provided.</p> <ul style="list-style-type: none"> <li>❖ <b>For appeals against denials of requests</b> <ul style="list-style-type: none"> <li>○ <b>Contact point:</b> a formal appeal can be lodged with the Bank's Secretary General, responsible for overseeing the implementation of the Public Information Policy via email, or fax within 20 days of the receipt of the decision, which is the subject of the appeal</li> <li>○ <b>Languages:</b> same as aforementioned under 'languages'</li> <li>○ <b>Acknowledgement of appeal:</b> The Bank's Secretary General acknowledges the receipt of appeal within 5 working days of receiving it.</li> <li>○ <b>Clarification of request:</b> the Bank may ask the applicant to provide clarifications.</li> <li>○ <b>Decision:</b> The Secretary General provides the appellant in writing of the Bank's decision and supporting reasons no later than 20 working days</li> </ul> </li> </ul>	<p>the information requested is difficult to retrieve.</p> <ul style="list-style-type: none"> <li>○ Refusal to grant access to information: reference to provisions in policies that justify the denial.</li> <li>○ Publication of requests: the InfoUnit will post on the ADB website a list of requests reviewed and the corresponding decisions</li> </ul> <ul style="list-style-type: none"> <li>❖ <b>Appeals</b> <ul style="list-style-type: none"> <li>➤ <b>First stage of appeal: Public Disclosure Advisory Committee (PDAC)</b> <ul style="list-style-type: none"> <li>○ In the event that a request for information is denied, the requester will be informed of the right to file an appeal to the PDAC.</li> <li>○ Acknowledgement: of receipt of an appeal within 5 working days.</li> <li>○ Decision: No later than 20 working days after receiving the appeal.</li> </ul> </li> <li>➤ <b>Second stage of appeal: Independent Appeals Panel (IAP)</b> <ul style="list-style-type: none"> <li>○ In the event that a request for information is denied by the PDAC, the requester may file an appeal to the IAP through Office of Secretary (SEC.)</li> <li>○ The IAP determines whether ADB violated the policy by</li> </ul> </li> </ul> </li> </ul>		<p>Alternatively, the applicant may lodge a complaint with the Complaint Mechanism within one year of the EIB's response, or initiating court proceedings against the Bank before the Court of Justice of the European Union.</p>
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		<p>after receiving the appeal or clarification.</p> <ul style="list-style-type: none"> <li>○ Should the Bank's handling of project-related information be the object of a complaint by an affected group, cases are the <a href="#">Project Compliance Mechanism for non-compliance</a> with the relevant policy can be called in.</li> <li>○ <a href="#">Information to the Board</a>: The Secretary General will inform the Board in the event of a decision to refuse the release of information</li> </ul> <p>❖ <a href="#">Reporting</a></p> <ul style="list-style-type: none"> <li>○ In the annual <a href="#">Public Information Policy: Report on the Implementation</a> the Bank reports its handling of requests and provides a record of responses, including how the appeals have been dealt with.</li> </ul>	<p>restricting access to information, the OSEC will, on behalf of IAP, acknowledge receipt of the appeal within 5 working days, with a copy to the ADB department r office that took the initial decision that took the initial decision to deny the request.</p> <ul style="list-style-type: none"> <li>○ The relevant department will submit to the IAP, through OSEC, a statement explaining which exception applies and why.</li> <li>○ Any statement by ADB or third parties must be filed with OSEC in writing within 3 weeks of the IAP's acknowledgement of the appeal.</li> <li>○ In case the IAP members cannot reach a unanimous decision, the decision will be taken by majority vote.</li> </ul> <p>❖ <a href="#">Monitoring and reporting</a></p> <ul style="list-style-type: none"> <li>○ <a href="#">An annual report</a> to be posted on the Bank's website to show implementation of the Public Communications Policy and monitoring results.</li> <li>○ The annual report will include a summary of access-to-information refusals to provide information to the public, as</li> </ul>		
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			<p>well as any recommendations for changes to the policy</p> <ul style="list-style-type: none"> <li>○ ADB will not disclose the names of individuals or groups that raise concerns about the implementation of the policy</li> <li>❖ <a href="#">Review of policy</a>: ADB conducts a general review of within 5 years from the effective day of the policy.</li> </ul>		
<p><b>General observations on AIIB's current PIIP</b></p> <p><b>Recommendations to AIIB's PIIP</b></p>	<p>No proposed implementation and monitoring of the Bank's public information policy</p> <p>No public interest test - no considerable of revealing info if shows abuses, human rights violations, corruption, threats to public health or enviro.</p> <p>Lack of procedures for access. No mechanisms for requesting info times, fees, access rights.</p> <p>Appeals mechanism weak, most of which are internal at this stage.</p> <p>No external review mechanism like WB, AFDB, ADB, IADB.</p>				