

## Transparency International Input to World Bank's Approach Paper re: Disclosure Policy

June 4, 2009

We write in response to the World Bank's request for input to its Approach Paper "Toward Greater Transparency: Rethinking the World Bank's Disclosure Policy." Please accept this letter and its attachments as the official view of the entire Transparency International (TI) Network. TI consists of over 90 chapters in both developing and developed countries, all of whom are shareholders in the World Bank.

TI welcomes the Bank's initiative to embrace a disclosure policy based on the presumption that all Bank-issued and -related documents should be made public in principle, and that exceptions should be narrowly and clearly defined. The presumption of disclosure, accompanied by routine and proactive publication of information can only improve the Bank's quest for transparency and accountability to its stakeholders.

At the same time, TI concurs with the views of our civil society colleagues of the Global Transparency Initiative (GTI), that the Approach Paper contains a number of shortcomings. In particular, among others:

- The lack of a clear vision on how access to information improves development outcomes and supports the Bank's poverty reduction mission;
- The overly-broad exceptions to disclosure which are not based on an assessment of potential harm to well-defined interests;
- The right of third parties to veto the release of information they provide to the Bank;
- A lack of detail on how requests for information are to be processed;
- The absence on an independent appeals body; and
- The lack of any proposal for providing greater access to translated materials; and
- No commitment to strengthen the Bank's Public Information Centers or to promote access to information actively.
- No discussion of resources committed and implementation milestones to ensure the Policy's implementation.

In the attached documents, which Transparency International collectively endorses, GTI proposes necessary modifications to the policy envisioned in the Approach Paper. We support both its comments on the Approach Paper and its Model World Bank Policy on Disclosure of Information.