The African Development Bank Group (AfDB) Response
to the report “In Practice: Information Disclosure at the African Development Bank”
submitted by the International Accountability Project (IAP) on 15th February 2021
INTRODUCTION

The African Development Bank Group welcomes the IAP’s assessment of its online disclosure practices for the period 1 January – 31 December 2019. The assessment coincides with the AfDB’s DAI policy implementation review currently underway and is anticipated to inform the 2012 DAI policy revision.

The Bank is pleased with IAP’s use of the AfDB Data Portal which provides easy access to a range of essential project information. MapAfrica also presents high level visualizations and access to region, sector and country, level information that leads to documents access. These are part of the Bank’s continuing efforts to enhance transparency and accountability.

In this regard, we wish to point out that the Bank’s disclosure initiatives and efforts translated into global recognition as Publish What you Fund--the organisation leading the International Aid Transparency Initiative, rated the Bank as one of the most transparent organisations globally (4th) since 2018.

In its report however, IAP makes 5 recommendations which have been carefully reviewed by the Bank. This response is intended to present the Bank’s factual positions on issues and recommendations made by IAP.

The Bank takes note of the research findings outlined in the report:

- AfDB has some strong disclosure practices. It consistently discloses lead contact information on its project webpage, accounting for 145 of the 179 projects in the dataset (82%).
- The Bank discloses its documents in more than one language (English and French).
- The Bank consistently discloses information summaries for all projects (e.g. summary for a project and Environmental & Social Impact Assessment Summaries, full reports and action plans).
- The report highlights many issues to be addressed by the Bank, whilst concluding that the level of disclosure for information on environmental and social risks and mitigation is one of AfDB’s weaker disclosure practices.

Table 1 provides detailed responses on issues raised by IAP.

CONCLUSION

The IAP’s assessment is timely as it coincides with the AfDB’s DAI policy implementation review currently underway. The recommendations made by IAP does undoubtedly support the Bank’s principles of maximising information disclosure and access as embedded in its DAI policy.
Table 1: AfDB’s responses to issues raised by the International Accountability Project

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<tr>
<th>RECOMMENDATION 1 – Prioritize Community Access, Strengthen the Overall Accessibility of Information Disclosed and the Timing of Disclosure.</th>
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<tr>
<td><strong>ISSUES RAISED BY IAP</strong></td>
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<tr>
<td><strong>AfDB’s RESPONSE</strong></td>
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<tr>
<td>ISSUE #1: The overall accessibility of information disclosed by AfDB is poor and should be strengthened.</td>
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<td>ISSUE #2: The substance of the disclosure is inconsistent and inadequate to facilitate community access to information.</td>
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<th>RECOMMENDATION 2 – Increase the Overall Accessibility of Information Disclosed on Project Websites</th>
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ISSUE #1: The current layout and limitations of AfDB’s website only serve as a barrier to access.

ISSUE #2: Communities seeking to access complete information about a project’s environmental and social impacts or to further engage with AfDB or its borrowers are required to connect the dots and pore through the institution's online infrastructure and technical documents.

ISSUE #3: The project websites do not provide information about the independent accountability mechanism or procedures to file an access to information request.

ISSUE #4: Further, the project websites do not provide information on the environmental and social safeguards that are triggered by the project or where the project risk rating is provided, the rationale for that categorization.

Following a study conducted in 2019 on the Bank’s website, the website was redesigned and its layout and navigation have since improved. Web users seeking bank related documents can access them via this dedicated portal https://projectsportal.afdb.org/dataportal/

The redesign of the website also entailed content migration and a redirection to the projects portal which has IATI compliance. This contributed to the Bank’s ranking as one of the top 4 organizations that share transparent and open data on project impact results evaluation (Aid Transparency Index report 2018). The Bank maintained that position in 2020 whilst improving its overall score: https://www.publishwhatyoufund.org/the-index/2020/ making the portal the best reference for users seeking projects information on its website.

The Environmental and Social Assessment (ESA) disclosure is an information sharing for external stakeholders to be able to participate in third party monitoring, not for consultation that is completed before the project owner and the Bank disclose the approved documents. However, the Bank’s accountability mechanism is set to provide a window for any complaints and comments on Bank’s compliance to its own policies.

Information on Independent Accountability Mechanism is found in the Project Appraisal Reports (PAR), which are Bank owned documents, and not the ESAs which are the Borrower’s documents. Besides, any external stakeholder must seize the Bank through either the President (Top Management) or the Accountability mechanism), thereby using the institutional approach.

As well, there is a specific link (disclosure and access to information) on the Project data portal leading to the disclosure and access to information (DAI) main page. On that page, users can access the Bank's
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<td>ISSUE #1: Although AfDB often discloses documents, including environmental studies, procurement, and expressions of interest, in French and English, this practice could be strengthened to include other regional languages</td>
<td>The AfDB is a bilingual institution and makes every endeavor to disclose documents, in French and English when documents are available in the two languages. Sometimes, documents for certain operations (e.g. emergency assistance) are available only in one language. With regards to publishing documents in other languages besides English and French, the Bank over the past couple of years has made efforts to publish highlights of its flagship publication (the African Economic Outlook) into several local languages such as Arabic, Hausa, Kiswahili, Amharic, Pidgin English, Zulu and Yoruba. The main objective of publishing the highlights in local African languages is to ensure accessibility to the information it contains, promoting inclusiveness, widespread coverage, and relevance of the publication within stakeholder communities at the district and local levels. Besides, some important project documents like ESAs are prepared and disclosed by project owners (Countries and Private entities) in the official language of the hosting country. The Bank always requests to insert an executive summary either in English or French.</td>
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### RECOMMENDATION 4 – Strengthen Disclosure of Environmental and Social Risks and Mitigation Measures to Facilitate Communities’ Understanding of a Project.

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<td>ISSUE #1: As a whole, the level of disclosure for information on environmental and social risks and mitigation is one of AfDB’s weaker disclosure practices</td>
<td>The Bank’s Integrated Safeguards System (ISS) sets out three categories for disclosure: 120 days for Category 1 mostly for Sovereign Operations (SO), 60 days for Non-Sovereign Operations (NSO) Category 1, and 30 days for Category 2 (both SO and NSO). The Bank discloses ESA documents prepared and approved by the Project owner, for all operations subject to E&amp;S requirements as per the Integrated Safeguard System. Full Environmental and Social Assessment (ESA) reports of the Borrower/Client, including the executive summary, are disclosed through the external website (see link below). As well, any Borrower’s ESA document is cleared only when it includes a sound environmental and social management plan (ESMP).</td>
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<td>ISSUE #2: Summaries of environmental and social impacts, when available, were found in technical project documents, requiring communities to search for this information</td>
<td>The website for publishing ESAs is accessible to the public and is available at this link: <a href="https://www.afdb.org/en/documents/environmental-social-assessments">https://www.afdb.org/en/documents/environmental-social-assessments</a></td>
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### RECOMMENDATION 5 - Prioritize Disclosure that Facilitates Community Access to Consultation, Stakeholder Engagement, and Remedy.

<p>| ISSUES RAISED BY IAP | AfDB’s RESPONSE |</p>
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<th>ISSUE #1: AfDB’s disclosure practice is particularly weak in providing access to information on stakeholder engagement and consultation - the details of how and when a community member can engage with a project.</th>
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<td>The Bank conducted an assessment to identify capacity needs and gaps of its Civil Society Engagement (CSE) as a basis for designing a capacity development programme to address them. The assessment focuses on CSE in Bank policies, operations, and projects as well as in individual capacities. It also highlights needs and gaps of Civil Society Organisations regarding organisational, technical, and individual capacities for a more effective and productive engagement with the Bank. In this need’s assessment, civil society organizations indicated that not all information on the website is accessible or relevant to them and that navigating the Bank’s website-on which AfDB publicly discloses projects- poses lots of challenges. The Bank intends to revamp the Civil Society and Community Engagement webpage into a knowledge and learning platform that shall provide information that is relevant and will facilitate access to information on Bank policies, operations, and projects by civil society organizations in a timely manner.</td>
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<td>ISSUE #2: No information about the policy was found on the project web pages, again requiring affected communities to connect the dots.</td>
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<td>The Bank, through the Civil Society and Community Engagement Division, organizes Civil Society Open Days. These events are organized in the African Development Bank’s Regional Members Countries. During these Open Days, Civil Society Organizations are invited to engage in country dialogue. AfDB’s Strategies and programming policy are systematically submitted to Civil Society and these Open Days serve as a platform for civil society organizations and Bank staff to exchange on and discuss Bank’s portfolio in the country and the pipeline of project, to ensure transparency and accountability in regional member countries.</td>
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<td>Enabling civil society organizations/communities to have access to this information better prepares them for the consultations on Country Strategy Papers (CSPs) the Bank invites them to take part in. In line with this, the Bank is currently in the process of finalizing guidelines for mainstreaming civil society engagement in CSPs. These guidelines will enable the systematic integration of the voices, views, and aspirations of CSOs, communities and citizens into key practical and operational policies that lay the ground for effective community engagement at country and regional levels.</td>
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The Bank is also finalizing a tool that will revolutionize the civil society/community engagement approach: The Toolkit for mainstreaming civil society engagement in projects. It will boost non-state actors and citizens’ capacity to demand transparency and accountability from both the Bank and its implementing partners, including national Governments, donors, and the private sector.

As indicated above, there is a specific link ([disclosure and access to information](#)) on the Project data portal leading to the disclosure and access to information (DAI) main page. On that page, users can access the [DAI Policy](#), [Handbook](#), Information Request forms (in [English](#) & [French](#)), [Information Appeal process](#) as well as [FAQs on disclosure](#).
Dear Mr. Elias Jika,

Re: Opportunity to Comment on International Accountability Project (IAP)’s in Practice: Information Disclosure at the African Development Bank

I refer to your email dated 15 February 2021, in which you shared with the Bank your research findings on the African Development Bank’s (AfDB) online information disclosure practices for projects approved in 2019.

The Bank’s Records Management and Information Disclosure Secretariat within the Office of the Secretary General and General Secretariat which is mandated by the Board to oversee the successful execution of the Disclosure and Access to Information Disclosure policy, has carefully reviewed your report in consultation with stakeholder units of the Bank.

The Bank group is committed to the principles of good governance, particularly transparency, accountability and sharing of information on its operations. In this regard, the Bank welcomes the draft report and the opportunity to provide comments.

The Bank notes that seven out of the report’s seventeen questions focused on the disclosure of Environmental and Social Impact Assessment Reports and related actions; the remainder touched on stakeholder consultations, disclosure before Board approval, accountability and disclosure mechanism, information shared in approved project documents, as well as disclosure in languages accessible to the affected populations of Bank Projects.
The Bank equally takes note of the following research findings outlined in the report:

- AfDB has some strong disclosure practices. It consistently discloses lead contact information on its project webpage, accounting for 145 of the 179 projects in the dataset (82%).
- The Bank discloses its documents in more than one language.
- The Bank consistently discloses information summaries for all projects.
- The report highlights many issues to be addressed by the Bank whilst concluding that the level of disclosure for information on environmental and social risks and mitigation is one of AfDB’s weaker disclosure practices.

The Bank’s acknowledges that some of the shortcomings and proposed recommendations are consistent with initial findings of the Bank’s own DAI Policy Implementation review currently underway.

A detailed response addressing specific issues raised in your draft report has been prepared and hereby attached for reference.

The Bank reiterates its continued commitment to transparency, accountability and information sharing on its projects, as evidenced by the Bank’s 4th place ranking in Information Disclosure among the world’s major development institutions in the 2020 Aid Transparency Index.

While thanking you for your interest in the activities of the African Development Bank Group, please do not hesitate to contact the Bank Group through the Records Management and Information Disclosure Secretariat (IDC.RRDC_Secretariat@AFDB.ORG) should you have any additional concerns or questions.

Yours sincerely,

Prof. Vincent O. Nmehielle.

Attach:

CC:  Ms. Bajabulile Swazi, TSHABALALA
     Ag. Senior Vice President, SNDI0 Vice President, FIVP

Mr. Simon MIZRAHI
Director, SNDR /Acting Director PCER0

Mr. Maman-Sani ISSA
Director, Safeguards and Compliance Department, SNSC

Ms. Zeneb TOURE
Manager, Civil Society and Social Innovation, AHGC2

Mr. David MAINGI
Manager, Media, and External Relations Division, PCER

Ms. Nathalie B. CHINJE-N BODIONG
Lead Advisor to the Secretary General, PSEG0