In Practice: Information Disclosure at the African Development Bank
International Accountability Project
Updated May 2021

The [Early Warning System](#) team strives to ensure the accuracy of the data. This analysis is being shared with the African Development Bank in advance of publication to allow opportunity for comment. While the Early Warning System team has made every attempt to research and present data accurately, it is often difficult to guarantee the complete accuracy of certain projects due to the lack of consistency and transparency in how various development institutions record and publish information. Where there is a lack of clarity in the information, the team has represented the information cautiously. The Early Warning System team is committed to correcting any identified errors at the earliest opportunity.

Founded in 1964, the African Development Bank Group (AfDB) provides financing to African governments and private companies investing in the bank's regional member countries. The bank has a stated overarching objective of contributing to poverty reduction through spurring sustainable economic development and social progress in its regional member countries. The ADB's *Policy on Disclosure and Access to Information* ("*Policy on Disclosure and Access to Information*" or the "*Policy*") provides the primary channel for achieving the Bank's objectives. The current *Policy* has been in effect since February 2013 and despite calls from civil society groups, it has not been revised since. Recently, the AfDB undertook an implementation review of the *Policy*, prompting [concerns from civil society groups over the opaque and closed stakeholder consultation process](#).

As the [International Accountability Project](#) (IAP) and our partners have repeatedly witnessed, the profound impact of development projects warrants that the policies and operations of development banks be robust and reflect international best practice and international human rights standards.

The *United Nations Declaration on the Right to Development* makes clear that an essential element to the realization of the right to development is that "[[t]he human person is the central subject of development and should be the active participant and beneficiary of the right to development.](#)" **This commitment must begin with a strong foundation in communities' right to seek, receive and impart information, as equal partners in development.** Having early access to information can mean the difference between a community learning about a project when the bulldozers arrive, and a community engaging with investors to co-design a project that mitigates or avoids harm and creates real benefits. In practice, **the right to information goes far beyond simple information disclosure - it ensures that communities are equipped with the necessary information to substantively engage and participate in the development processes that will ultimately affect their lives and environment.**

To this end, IAP and our partners monitor the online disclosure practices of 15 development finance institutions through the *Early Warning System* initiative, to better understand what project information is being disclosed, when it is being shared, and ultimately, how accessible the information is for communities--the purported beneficiaries of development projects. Most recently, we engaged with the Dutch Development BanK (FMO), European Bank for Reconstruction and Development (EBRD), the private sector lending arm of the Inter-American Development Bank, IDB Invest, and the newly-minted United States International Finance Development Corporation (DFC) to share comments and recommendations on their disclosure practices, as part of their public consultations on their respective access to information policies.

We share our assessment in the spirit of encouraging robust and people-centered information disclosure policies and practices at AfDB, which reflect leading international standards and best practice.

Our Methodology

Our analysis tracked information disclosed on AfDB's website from January 1, 2019 to December 31, 2019, a total of **179 approved projects,** using the Bank's self-reported list of projects.[1] Between July to October 2020, we monitored AfDB's disclosure practices by reviewing and assessing the information disclosed on each project's webpage, based on the following criteria, which are aimed at maximizing community access to information.

Specifically, where available, our methodology tracks the following for each project:

- The number of days available for communities to access information before an investment decision is made (also known as the Board date);[2]
- Whether a summary or overview of potential adverse environmental and social impacts was disclosed;
- Whether project-specific adverse environmental and social impacts were disclosed;

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[1] For purposes of this analysis, we used a list from AfDB Data Portal project website, available at: https://projectsportal.afdb.org/dataportal/VProject/list. The website allows you to search for projects by "Year of Approval." The list of projects disclosed on the Data Portal in the dataset was reviewed again in December 2020, before publication, and 2 more projects were added to the dataset.

[2] For purposes of this analysis, this criterion was not analyzed. As noted above, the information disclosed on the AfDB website was for approved projects. Additionally, AfDB does not routinely provide disclosure dates. Without this information, it was impossible to assess the number of days communities have to access information before Board consideration of a project.

- Whether it was clearly specified which environmental and social safeguards were triggered for a project;
- Whether details were given on how potential harms would be mitigated and prevented;
- Whether documents outlining plans or systems for addressing risk and identified adverse impacts were available;
- Whether non-technical summaries of environmental and social impact assessments were available;
- Whether the full text of environmental and social impact assessments were available;
- Whether documents outlining stakeholder engagement plans were available;
- Whether information on consultations, including opportunities for ongoing consultation after Board approval, was disclosed;
- Whether contact information for the borrower or client was provided;[3]
- Whether contact information for AfDB project leads was provided;[4]
- Whether information on submitting a request for access to information was provided;
- Whether information on the Borrower's project-level grievance mechanism was provided;
- Whether information on AfDB's accountability mechanism was provided;
- Whether project information summaries were available in languages other than English; and
- Whether any technical documents (not including project summaries) were available in languages other than English.

Before delving into our findings, we acknowledge three limitations with regard to this criteria:

First, our criteria is not based on or solely limited to the parameters of existing policy requirements, because we recognize that most disclosure practices and policies could be strengthened to prioritize communities' right to access information. In other words, the following analysis does not evaluate compliance with AfDB disclosure policies; instead, our analysis seeks to track and assess AfDB's practice of disclosure against criteria which, if met, would establish the foundation for the **meaningful fulfillment of communities' right to information**. The specific criteria is derived from our experiences working directly with communities affected by development bank projects, and the work of IAP and our partners to make project information accessible through the *Early Warning System.*

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[3] This criterion reviews whether borrower or client project contacts were disclosed. For purposes of this analysis, and as discussed below, for some projects the borrower or client contact information was provided only in procurement or bidding documents and could not be verified as the project leads.
[4] This criterion reviews whether specific AfDB project contacts, rather than generic contacts (e.g., privatesector@afdb.org) were disclosed.

Second, we evaluated this criteria based on **the principle of early access to information.** Communities have the right to know and to be meaningfully consulted before any investment decision is made, and the right to remedy, should they suffer harm from projects. Moreover, our experiences have demonstrated that communities' legitimacy and local expertise can better the design of potential projects, anticipating and mitigating adverse impacts, to ensure that projects achieve positive impacts that also further community development priorities. Correspondingly, our methodology primarily focuses on the minimum information communities should expect to access when a project is still in its **proposed stage**, given that the ideal would have communities participate in conceptualizing, designing, and contributing to projects that are explicitly aimed at fulfilling their development priorities, in harmony with larger societal goals. [5]

Third, our findings only address information, including any documents, disclosed through the AfDB website, its primary medium of communication. While beyond the scope of our analysis, it bears emphasis that reliance on a website as the primary means of disclosure in and of itself sets a significant limitation on the accessibility of the information disclosed for many communities. Access to the internet can be unreliable and cost prohibitive. Moreover, it is unrealistic to expect that communities with access to the internet would constantly monitor projects in the pipeline of various development finance institutions. In order to meaningfully fulfill the right to information, AfDB should take steps to ensure that information reaches communities potentially impacted by its projects through means accessible to them, before a project is considered for investment.

The draft of the analysis was shared with the AfDB in February 2021 for comment before publishing, and the AfDB provided a response in March 2021. You can find the AfDB's response here. (https://accountabilityproject.org/wp-content/uploads/2021/07/AfDB-Response.pdf)

Our Findings & Recommendations on AfDB's Disclosure Practices

Risk Category	_# of Projects_
Category 1	32
Category 2	34
Category 3	38

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[5] At the time of research and writing, and based on the available information on the AfDB website, the 179 projects in the dataset were all approved at the time of analysis and writing. Since the time of writing, we are aware there have been further updates to some project web pages, but that is beyond the scope of this analysis.

Category 4	3
Unknown or Unassigned	72

Our analysis of AfDB's disclosure practices shows that the institution has some strong disclosure practices. Of note, the bank consistently discloses AfDB lead contact information on its project webpage, accounting for 145 of the 179 projects in the dataset (82%). At the time of writing, documents were also disclosed in other languages apart from English for the majority of the projects in the dataset -- 122 of 179 projects (69%). It is important to note, however, that the only other language that documents were disclosed in was French. These points are further discussed below.

Despite these positive disclosure practices, the overall quality of information disclosed remains inadequate. AfDB's disclosure practices fall considerably short of fulfilling communities' right to information, thereby erecting substantial barriers to access and meaningful participation for project affected communities.

> *Recommendation*: *Prioritize Community Access, Strengthen the Overall Accessibility of Information Disclosed and the Timing of Disclosure*

Despite consistently disclosing project information summaries for all projects, **the overall accessibility of information disclosed by AfDB is poor and should be strengthened**. Specifically, while project information summaries are published for all projects, the substance of the disclosure is inconsistent and inadequate to facilitate community access to information.

To begin, at the time of writing, there was moderate disclosure of adverse environmental and social impacts, with 97 of 179 projects (54%) having no such information disclosed.[6] The majority of projects, or 97 (54%), did not have project-specific impacts disclosed. In addition, the disclosure of information on applicable AfDB safeguards that have been triggered by the project is poor -- 123 of 179 projects (69%) did not clearly indicate which AfDB's safeguards were triggered. Additionally, this analysis could not analyze the number of days communities are provided notice of a project before it is approved because the date these project documents were first made publicly available (known as the date of disclosure at other development finance institutions) is not disclosed.

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[6] Of the 97 projects, 11 only disclosed positive impacts.

These nuances are integral for communities seeking to understand opportunities for engagement with individual projects insofar as they facilitate their comprehension of a project and the fulfillment of their right to information throughout the project lifecycle. With adequate notice, projects in a proposed stage offer communities the opportunity to participate in the design, while those that are nearing completion should ensure communities are informed and able to engage in monitoring and contributing feedback on implementation and impact.

Given the inconsistency of this disclosure, **we recommend that AfDB publicly disclose all projects in the pipeline, regardless of risk category, in a timely manner that facilitates community engagement.** We recommend that communities be given as much time as possible, ideally at least 120 days in line with international best practice, in order to meaningfully engage in the proposal stage of a project. Dates relating to disclosure, updates to project information, and the date of project approval should also be clearly disclosed throughout the life cycle of the project.

> _Recommendation: Increase the Overall Accessibility of Information Disclosed on the Project Websites_

Notwithstanding the limitations noted above associated with relying on the website as the primary means of disclosure, AfDB's publicly available database of project information should be redesigned to provide clear, consolidated, and accessible project information. The current layout and limitations of AfDB's website only serve as a barrier to access. As currently designed, the project web pages routinely provide a project summary, a brief description of the project and an AfDB project contact. However, as discussed below, information about environmental and social impacts and contacts for the borrower or client, when available, are found only in the attachments, requiring communities to dig through often highly technical documents to retrieve this critical information.

Moreover, 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. The project websites do not provide information about the independent accountability mechanism or procedures to file an access to information request. 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. Additionally, the structure

of the web pages containing project information may be confusing and inaccessible.[7] **As a result, we strongly recommend AfDB redesign its online project information pages to clearly identify the information outlined above, and expanded upon below.**

> _Recommendation:_ Increase the Linguistic Accessibility of Project Information

Availability of Project Information and Documents in Languages other than English

- _Whether project information summaries were available in languages other than English_
  - Yes - 122
  - No - 57

- _Whether any technical documents (not including project summaries) were available in languages other than English_
  - Yes - 122
  - No - 57

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. More specifically, **while it is commendable that 122 out of 179 projects (68%) included technical documents in French, none of the projects included translations in Arabic, Kiswahili, Portuguese or other local languages, despite the geographic scope of AfDB's investments**. For example, 18 of the projects in the dataset (10%) are being implemented in North Africa, while 15 more (8%) are regional projects. Additionally, there was a lack of consistency in the documents where translations were available - not all English documents had corresponding French translations, and vice versa.

As a development finance institution that regularly invests in non-English speaking contexts, **AfDB should increase the linguistic and technical accessibility of the information it discloses by ensuring that its project information summaries are available in the relevant national language, at a bare minimum, and that it provides translated Environmental and Social Impact Assessment packages to ensure the meaningful fulfillment of the right to information.[8]**

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[7] Project information--namely, the status of the project, investment amount, sector and a link to the project website -- can also be found at [Map Africa](#). We recommend consolidating this information on the specific project website to facilitate access to this information.

[8] Ideally, these documents would also be translated into and available in the local languages and dialects of potentially affected communities.

> **_Recommendation:_** _Strengthen Disclosure of Environmental and Social Risks and Mitigation Measures to Facilitate Communities' Understanding of a Project_

Disclosure of Environmental and Social Risks and Mitigation Measures

- _Whether a summary or overview of potential adverse environmental and social impacts was disclosed_
  - Yes, in document only - 82
  - No, only positive impacts - 11
  - No - 86

- _Whether project-specific adverse environmental and social impacts were disclosed_
  - Yes - 82
  - No - 97

- _Whether details were given on how potential harms would be mitigated and prevented_
  - Yes - 81
  - No, only stock language - 8[9]
  - No - 90

As a whole, the level of disclosure for information on environmental and social risks and mitigation is one of AfDB's weaker disclosure practices. Communities have the right to know and understand the complete picture of a project - including both the perceived benefits and risks - before a project is approved so that they can meaningfully contribute alternatives and solutions to mitigate or avoid potential adverse impacts, and ensure that any intended benefits align with their development priorities.

According to our analysis, not one of the 179 projects (0%) in our dataset provided an overview of the adverse environmental and social impacts likely to result from a project on the project web page.[10] Summaries of environmental and social impacts, when available, were found in

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[9] This includes 8 projects for which the only mitigation measures noted in documents were to the project's success, rather than for environmental and/or social risks. While stock language provides a general understanding, project-specific impacts and mitigation measures are essential to enable meaningful community engagement in the design and implementation of projects, regardless of risk category.

[10] Where a project narrative was disclosed on the project website, the components usually consisted of these sections: project summary, project general description, objectives, beneficiaries, and participating

technical project documents, requiring communities to search for this information. Of particular concern, nearly half of all projects reviewed, or 86 projects (48%), did not disclose any environmental or social impacts on the project webpage or documents. We note that an additional 11 projects, or 6% of the dataset, identified only positive impacts and did not discuss potential harms caused by the project.

Further, **project-specific impacts were disclosed for only 82 projects, or 46% of the dataset. In fact, for more than half of the projects -- 97 out of 179 projects, or 54% -- there were no project-specific impacts disclosed.** Similarly, for the vast majority of projects in our dataset -- 90 out of 179 projects, or 54% -- details concerning how potential environmental and social harms would be mitigated were not available.

Disclosure of Applicable Environmental and Social Safeguards

- *Whether it was clearly specified which environmental and social safeguards were triggered for a project*
  - Yes - 56
  - No - 123

With respect to this criteria, only **56 of the 179 projects, or 31% of the dataset, contained a list of the applicable environmental and social safeguards triggered**, disclosed only within technical documents. AfDB's disclosure practice should also be strengthened to disclose -- in a clear, consolidated and accessible list -- the environmental and social safeguards triggered by a project. Knowing which environmental and social policies and standards are applicable to a project, in addition to the rationale for applying these standards, is essential for communities seeking to both understand the impacts of a project and how to meaningfully engage. Additionally, within the framework of the Bank's accountability system, including its independent accountability mechanism, safeguard policies dictate community entitlements under a project and the standards by which communities can reasonably hold the development finance institution to account.

Disclosure of Environmental and Social Documents

- *Whether documents outlining plans or systems for addressing risk and identified adverse impacts were available*[11]

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organizations. Environmental information on risks and mitigation, if available, was disclosed through environmental studies and appraisals.

[11] For purposes of this analysis, we included projects for which a summary of the ESMP or ESAP was provided.

- Yes - 53
- No, but referenced in project information summary - 17
- No, but referenced for future creation - 5
- No - 104[12]

- *Whether non-technical summaries of environmental and social impact assessments were available*
  - Yes - 27
  - No, but referenced as not required in project information summary - 2
  - No - 150

- *Whether the full text of environmental and social impact assessments were available[13]*
  - Yes - 33
  - No, but referenced in documents or project summary - 12
  - No, but referenced for future creation - 3
  - No - 131

Meaningful community engagement is supported and facilitated when key environmental and social documents, including assessments are disclosed in full, ideally accompanied by more accessible, non-technical summaries. Conversely, not routinely disclosing these documents erects an unreasonable barrier to access for communities seeking to fully understand the environmental and social impacts of a project, analyze the technical assessments produced within their own rubric of local expertise, provide recommendations that often highlight overlooked complexities, and suggest alternatives that better the overall project design.

Unfortunately, AfDB's disclosure practices are inadequate in this regard. Specifically, **only 53 out of the 179 projects (30%) disclosed plans or systems for addressing and mitigating adverse impacts.** Similarly, **non-technical summaries of environmental and social impact assessments**

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[12] This includes 1 project where project documents explicitly state that an ESMP or other environmental and/or social mitigation plans are not required and therefore, not disclosed. For example, the Appraisal Report, at page 9, for the Multinational - Capacity Building for the Operationalization of Eastern Africa Power Pool Regional Power Market Trade Project notes, in part, that:

> Capacity to Implement Environmental and Social Mitigation Measures: Because the project does not have any known direct negative impacts, there was no need to assess the ESMP implementing capacities of the implementing agency. This is in conformity with the Bank's Environmental and Social Safeguards Policies and Procedures.

[13] This criterion was deemed satisfied if either an Environmental/Social Impact Assessment or a Strategic Environmental and Social Assessment was disclosed.

were disclosed for only 27 out of 179 projects (15%), and the **full text of the environmental and social impact assessments was made available for just 33 of the 179 projects (18%).** A further 12 out of 179 (7%) projects referenced the existence of these assessments, without accompanying disclosure.

> **Recommendation:** *Prioritize Disclosure that Facilitates Community Access to Consultation, Stakeholder Engagement, and Remedy*

Disclosure of Information on Engaging During Project Design and Implementation

- ○ *Whether documents outlining stakeholder engagement plans were available*
  - ■ Yes - 2
  - ■ No, but referenced in project documents or summary - 9
  - ■ No, but referenced for future creation - 2
  - ■ No, despite stakeholders being identified - 67
  - ■ No - 99

Fulfilling the right to access information goes hand-in-hand with meaningful consultation and stakeholder engagement to ensure projects actually better the lives of those they affect. From the experience of IAP and our partners, inadequate consultation can result in or exacerbate existing environmental and human rights risks, resulting in social conflict and grievances. Without access to documents on the environmental and social impacts, action plans and policies, can communities truly be informed participants in consultations? Simply put, without access to the above information, communities are not enabled to meaningfully participate in the development process.

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. In our dataset, **only 2 out of the 179 projects (1%) disclosed the actual plans for stakeholder engagement.**

Disclosure of Project Contacts and Information on Mechanisms to Access Information and the Independent Accountability Mechanism

- ○ *Whether contact information for the borrower or client was provided*
  - ■ Yes - 4
  - ■ Yes, but only in environmental and social documents - 14
  - ■ No, not on project web page - 106

- ■ No, but bidding contact disclosed in procurement documents only - 55[14]

- ○ *Whether contact information for AfDB project leads was provided*
  - ■ Yes - 145
  - ■ No - 34[15]

Communities affected by development projects should also have access to project contact details in case they would like to obtain additional information about a project or further engage. Unfortunately, for the vast majority of the projects in our dataset -- **161 out of 179 (90%) -- lead contact information for the borrower or client was not disclosed**. Of the 161 projects, 55 projects had procurement or expression of interest documents that contained email, telephone, or mail addresses, but it was unclear whether those contact details corresponded to the borrower lead, under whose purview any environmental or social concerns could be raised. In contrast, **AfDB routinely discloses contact information for AfDB project leads on its website, this practice accounting for 145 out of 179 projects, or 81% of the analyzed dataset.**

- ○ *Whether information on submitting a request for access to information was provided*
  - ■ Yes - 0
  - ■ No - 179

- ○ *Whether information on AfDB's independent accountability mechanism was provided*
  - ■ Yes - 5
  - ■ No - 174

Although the African Development Bank has implemented its *Policy on Disclosure and Access to Information*, which, among other things, provides a process for requesting additional information, no information about the policy was found on the project web pages, again requiring affected communities to connect the dots. **Specifically, none of the 179 project summaries (0%) disclosed information on avenues to request additional project information. Similarly, only 5 of the 179 projects (3%) had information on AfDB's independent accountability mechanism included in project documents.**[16]   This disclosure practice is insufficient and falls far short of international

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[14] For 55 projects in the dataset, contact details for the borrower or client contact information were provided only in procurement and/or bidding documents and could not be verified as the project leads. This information was not provided on the project webpage summary, which has more commonly included information on AfDB project leads.

[15] For purposes of this dataset, we noted "yes" for projects in which a contact for a team lead/task manager was disclosed. We noted "no" for projects where only a generic email (e.g., private-sector@afdb.org or fapa@afdb.org) was disclosed on the project website or documents.

[16] An additional 2 projects of the 179 referenced the client's responsibility to inform communities of the IRM's existence, but did not provide more general information about how to access it.

best practice. Communities must know that they have access to remedy should they be adversely impacted by an AfDB project, and that the institution itself has a mechanism they can access, independent from the Borrower or a project-level grievance mechanism.

Looking Forward: Ensuring AfDB Adopts Robust Information Disclosure Practices and Policies to Center Communities in the Development Process

While AfDB's *Policy on Disclosure and Access to Information* is premised on the principle of maximum disclosure,[17] our analysis highlights that substantial gaps in its disclosure and practice will inhibit the ability of communities to meaningfully access key project information and ultimately, remedy.

AfDB's disclosure practice compels the question, <u>*what is the purpose of disclosing this information, and for whom is it intended?*</u> Potentially affected communities should be the primary target for this information, with the aim of fulfilling their right to access information, and equipping them with the necessary information to meaningfully engage in the development process. And yet, our analysis underscores the barriers faced by communities attempting to access information about AfDB projects.

This is troubling if we consider the context in which development occurs: one characterized by increasing restrictions and risks for communities who voice their concerns about projects, or in some instances, dare to request access to information. The COVID-19 pandemic has only exacerbated this dynamic, resulting in truncated disclosure timelines and limitations on in-person consultations and environmental and social oversight. This makes the need to safeguard

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[17] The Executive Summary of the *Policy on Disclosure and Access to Information* states, in relevant part, that:

> Under the revised Policy, information will be made accessible to the widest external audiences possible and provide opportunity to increase public exposure to and understanding of the Bank Group's activities. The revised Policy is therefore expected to generate maximum disclosure, increased access to information and an open and much strengthened engagement between the Bank Group and its stakeholders.

At paragraph 3.

In addition, paragraph 1.1.2 of the *Policy on Disclosure and Access to Information* states that:

> The Bank Group has long recognized that transparency is fundamental for development effectiveness and partnership goals. There is a direct relationship between the implementation of the Information Disclosure Policy and the ability and willingness of the public to be engaged in Bank Group activities. Furthermore, through greater transparency, stakeholders are able to monitor the outcomes of Bank Group operations and therefore help assure that benefits reach the intended beneficiaries.

transparency and the right to access information more urgent, and accordingly, the institution's information disclosure practices and policies more critical.

We urge AfDB to substantively strengthen its *Policy on Disclosure and Access to Information* **and disclosure practices through a robust and consultative review process.** This policy should adopt and embed the internationally endorsed principles on access to information, including the principle of maximum disclosure, which dictates that all information held by AfDB be subject to disclosure unless falling under a narrow list of clearly defined exceptions, and create an information request mechanism. [18]

A commitment to transparency and access to information must also ensure those who need the information most are able to receive and understand it. Recognizing that it is unrealistic for local communities to visit the AfDB website each day to see if any proposed project may affect them, the *Early Warning System* team is closing this gap by summarizing and distributing projects proposed by AfDB and other development institutions to partners in country, as soon as possible, a responsibility that should be borne by AfDB.

Please contact Elias Jika (elias@accountabilityproject.org) and Jocelyn Medallo (jocelyn@accountabilityproject.org) with any questions.

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[18] The list of principles, endorsed by the UN Special Rapporteur on Freedom of Opinion and Expression and the Organization of the American States (OAS) Special Rapporteur on Freedom of Expression, include:

1. The Right of Access
2. Automatic Disclosure
3. Access to Decision-Making
4. The Right to Request Information
5. Limited Exceptions
6. Appeals
7. Whistleblower Protection
8. Promotion of Freedom of Information
9. Regular Review

Article 19, *The Public's Right to Know: Principles on Freedom of Information Legislation*, available at: https://www.article19.org/data/files/RTI_Principles_Updated_EN.pdf. *See also* Global Transparency Initiative, *Transparency Charter for International Financial Institutions: Claiming our Right to Know*, available at: https://www.article19.org/data/files/RTI_Principles_Updated_EN.pdf.