

KEY POINTS ON DISCLOSURE POLICY: MIDDLE EAST & NORTH AFRICA REGIONAL FOCUS

1. **On presumption of disclosure:** It is a positive step that the Bank is providing for a presumption of disclosure for all information, subject only to exceptions, but these exceptions must be narrowly drawn and based on a "harm test". That is, (a) disclosure would cause serious harm to clearly and narrowly defined interests (i.e. commercial secrets, sensitive financial information) and (b) the potential harm caused by disclosure outweighs the public interest in the information.
2. **No acknowledgement of Access Barriers:** It is essential for the Disclosure Policy to reflect the reality of information access barriers. Marginalized communities and individuals (those discriminated against based upon gender, race, ethnicity, class, ability, religion, etc) potentially face difficulty in accessing information, and the disclosure policy needs to address this issue.
3. **Lack of disclosures:** The Bank ought to disclose documents related to Bank technical assistance and fee-based services, currently very opaque activities. The Bank provides a lot of technical assistance to the MENA region and we have very little information about these projects. Moreover, we are unable to know what position our respective governments are taking at the World Bank because board meeting summaries are not disclosed (only skeletal minutes are disclosed). This is a public institution and it is the public's money that is being spent. It is our right to know what is happening in these meetings.
4. **Translation:** English is the official language of the Bank. It routinely translates general information and its flagship publications into Arabic, Mandarin, French, Portuguese, Russian and Spanish. However for projects, only borrower governments bear translation responsibilities, and these are quite limited. The Bank ought to provide better translation mechanisms for key project/program documents. Language barriers can hinder people's ability to access information and thus participate effectively in the development process.

Suggestions for how this can be done:

- The cost can be reduced by setting up translation hubs in selected country offices (a suggestion from the Bank's Management)
- Many of the project/program documents must have already been translated considering not all country officials are fluent in English. It is just a matter of locating these translations.
- The Bank already requires the translation of certain documents but does not require that they are submitted to the Bank. Thus, requiring the submission of those translations so that they could be disclosed would require no additional spending.
(Please see *Talking points on translation issues* below, for more information)

5. **No drafts, delayed release:** The Bank does not release early project concept notes. Project information that is released before approval is often not updated. Environmental and social assessments are disclosed before approval, but the Bank withholds complete descriptions of a project (the Project Appraisal Document, PAD) until after approval. This severely hinders participation.
6. **Implementation:** Effective implementation of the disclosure policy is crucial. There is no point in having a disclosure policy that is not functional.