Global Green Growth Institute

Global Green Growth Institute
Seventh Session of the Assembly and
Eleventh Session of the Council (Joint Session)
October 31, 2018; Seoul, Republic of Korea

Enhancing GGGI's Transparency: Review of the Disclosure Policy

This paper presents as the conclusions of the Institute's review its current Disclosure Policy to ensure it is fit for purpose and aligned with good practice of other international organizations and a comparison of the current and proposed text for the Policy.

Members of the Council are invited to take note of the analysis and background to the Draft Decision on GGGI's Disclosure Policy.

Introduction

1. GGGI is committed to operating in a transparent and accountable manner. This commitment is recognized in Article 13 (Disclosure) of the Agreement on the Establishment of the GGGI. This is further affirmed in the Institute's Disclosure Policy [C/5/DC/2], that acknowledges public access to information of management and programming is a key component of effectively engaging stakeholders and ensuring the meaningful participation of stakeholders in support of its mission. The Disclosure Policy is a key component of GGGI's Accountability Framework, which is designed to allow stakeholders to hold GGGI accountable against obligations and commitments.

2. At the Sixth Meeting of the Management and Program Sub-Committee, the MPSC agreed to the Institute's proposal to review its Disclosure Policy to ensure it is fit for purpose and aligned with good practice of other international organizations. This document presents the result of the review and the proposed textual revisions for the Policy for consideration and approval by the Council.

Compliance with the current Policy

3. Article 13 (Disclosure) of the Agreement on the Establishment of the GGGI states,
   > The organs of the GGGI shall develop a comprehensive disclosure policy which ensures transparency in the work of the GGGI, including:

Consistent with GGGI's Disclosure Policy [C/5/DC/2], this document will be disclosed on the GGGI Website upon its approval by the Council, and its classification will be changed from "For Official Use" to "General Distribution".

a. the discussions, decisions and documents received, reviewed and adopted by the Assembly;
b. the criteria on which non-state entities are granted Observer status;
c. the discussions, decisions and related documents in the Council;
d. the criteria on which experts and non-state actors in the Council are selected;
e. the criteria and methodology for country program selection;
f. the criteria on which the members of the Advisory Committee are approved; and
g. the GGGI's annual audited financial statements.

4. The current version of GGGI's Disclosure Policy [C/5/DC/2] was adopted by the Council at its Fifth Session on June 19, 2014. This Policy replaced an interim Disclosure Policy adopted by both the Assembly [A/1/DC/5] and the Council [C/1/DC/11] at their first sessions on October 23 and October 24, 2012, respectively. The Council subsequently adopted a more comprehensive Disclosure Policy [C/2/DC/7] at its Second Session on January 18, 2013.

5. GGGI is compliant with the current Disclosure Policy, with information made available on the Institute's website (Table 1). While GGGI is compliant with its Disclosure Policy, there is scope to improve the accessibility of information that is disclosed on its website. For example, information may be contained in a specific decision of the Council meaning that a member of the public must know whether a matter was approved by written procedure or in session, and if the latter, must know which session the matter was approved.

Table 1. **Compliance with GGGI's Disclosure Policy**

Establishment Agreement	Disclosure Policy	Compliance
Art. 13(a) the discussions, decisions and documents received, reviewed and adopted by the Assembly	II.1.1. The final discussions, decisions and documents received, reviewed and adopted by the Assembly, Council and subsidiary bodies	Compliant
Art. 13(c) the discussions, decisions and related documents in the Council		
n/a	II.1.5. List of current participants in GGGI's statutory organs	Compliant
n/a	II.1.7. The GGGI's rules and procedures, including Rules of Procedure of the Assembly, Council, Advisory Committee and subsidiary bodies	Compliant
Art. 13(b) the criteria on which non-state entities are granted Observer status	II.1.2. The criteria on which non-state entities are granted Observer status;	Compliant
Art. 13(d) the criteria on which experts and non-state actors in the Council are selected	III.1.3. The criteria on which experts and non-state actors in the Council are selected	Compliant
Art. 13(e) the criteria and methodology for country program selection	III.1.5. The criteria and methodology for country program selection	Not applicable. Currently no criteria for country program selection
Art. 13(f) the criteria on which the members of the Advisory Committee are approved	III.1.4. The criteria on which the members of the Advisory Committee are approved	Not applicable. Establishment of the Advisory Committee has been postponed as per C/6/DC/6 on Governance Reform

	III.1.10. Final documents on the annual work program and budget, and project implementation updates issued by the Secretariat	Compliant.
	III.1.9. Annual amount of donation received and the use of donated funds	Compliant
	III.1.11. Major procurement solicitation notices issued, and name of vendor and contract amount awarded;	Partially compliant. Contact notices but not award.
	III.1.12. Recruitment of staff and employees	Compliant
Art. 13(g) the GGGI annual audited financial statements	III.1.8. The GGGI's annual audited financial statements	Compliant

Comparison with other international organizations

6. At the Sixth Session of the MPSC, members proposed that GGGI benchmark its disclosure policies against Asian Infrastructure Development Bank (AIIB), International Renewable Energy Agency (IRENA), United Nations Development Program (UNDP), and World Bank. The desk review and comparison focused on x components: (a) the rationale for the policy; (b) guiding principles; (c) categories of information disclosed; (d) exemptions; (e) medium for disclosure; (f) process for requesting information; (g) appeals process; (h) publication of contact for requests; and (i) miscellaneous.

7. Overall, GGGI's current Disclosure Policy compares well to those of the benchmarked organizations. The categories of information subject to disclosure within GGGI's Policy are far more explicit than the benchmark organizations, as too are the exceptions. However, GGGI could further articulate the principles underpinning disclosure as done by the AIIB and the World Bank to guide the implementation of the Policy itself. Table 1 presents the results of the comparison.

Proposed textual revision to the Policy

8. Further to the need for principles, it is proposed to revise the Policy to make explicit principles guiding its commitment to transparency, as well as other key documents, including Country Planning Frameworks (i.e. medium-term countries strategies), as well as policies and rules that support the implementation of the Regulations approved by the Council.

9. Table 2 presents the proposed amendments to the Disclosure Policy.

Table 1. Comparison of GGGI's Disclosure Policy with similar policies of other international organizations

	GGGI	AIIB	World Bank	UNDP	IRENA
Name of policy	Decision on the Disclosure Policy (19 June 2014)	Public Information Interim Policy (Jan 2016)	Bank Policy: Access to Information (rev July 2015)	Information Disclosure Policy (updated Oct 2015)	Policy on the public disclosure of documents (Jan 2012)
Rationale for the policy	"GGGI is committed to operating in a transparent and accountable manner, and in accordance with the principles set out in Article 13 of the Agreement on the Establishment of the GGGI."	"The Bank is committed to a policy on disclosure of information in order to promote transparency in its operations. This commitment is explicitly recognized in Article 34-3 of the Bank's Articles of Agreement"		"UNDP is committed to making information about its programmes and operations available to the public. UNDP considers public access to information a key component of effective participation of all stakeholders, including ordinary people, in the human development process".	"The policy of IRENA is to operate in a transparent and accountable manner… This policy is based on the premise that a) the effectiveness of IRENA's activities will be strengthened by public access to information, and b) broad availability to the public of information about IRENA will increase understanding and support of IRENA's mission, and increase transparency and accountability."
Guiding principle	This Disclosure Policy is based on the premise that public access to information is a key component of effective participation of all stakeholders and will increase understanding and support of the GGGI's mission…. It is the policy of the GGGI to publicly disclose information concerning its decisions and operational activities in the absence of a compelling reason to consider such information as confidential."	1) Promoting transparency: The Bank is guided by the underlying presumption that, whenever possible, information concerning the Bank's activities will be made available to the public in the absence of a compelling reason for confidentiality"; 2) Enhancing accountability: The Bank is committed to enhancing its accountability to its shareholders. The Bank recognizes the importance of public information and communication with other stakeholders… 3) Protecting confidentiality: As a financial institution and an international organization, the Bank has a responsibility to restrict access to information whose disclosure could cause harm to specific parties or interests…"	"The Bank allows access to any information in its possession that is not on a list of exceptions…In addition, over time the Bank declassifies and makes publicly available certain information that falls under the exceptions. Notwithstanding the broad intent of this Policy, the Bank reserves the right, under exceptional circumstances, to disclose certain information covered by the list of exceptions, or to restrict access to information that it normally discloses." "This Policy is based on five principles: - Maximizing access to information; - Setting out a clear list of exceptions; - Safeguarding the deliberative process; - Providing clear procedures for making information available; and - Recognizing requesters' right to an appeals process."	"UNDP's Information Disclosure Policy is guided by openness, with the underlying presumption that any information concerning UNDP programmes and operations enumerated in Part II is available to the public, in the absence of a compelling reason for confidentiality in line with the exceptions to the Policy in Part III."	"As a general matter, it is the policy of IRENA to publicly disclose information concerning its decisions and operational activities in the absence of a compelling reason to treat such information as confidential."
Categories of information subject to disclosure	1) The final discussions, decisions and documents received, reviewed and adopted by the Assembly, Council and subsidiary bodies; 2) The criteria on which non-state entities are granted Observer status; 3) The criteria on which experts and non-state actors in the Council are selected; 4) The criteria on which members of the Advisory Committee are approved; 5) List of current participants in all of the GGGI's statutory organs; 6) The criteria and methodology for country program selection; 7) The GGGI's rules and procedures, including Rules of Procedure of the Assembly, Council, Advisory Committee and subsidiary bodies; 8) The GGGI's annual audited financial statements; 9) Annual amount of donation received and use of donated funds; 10) Final documents on the annual work program and budget, and project implementation updates issued by the Secretariat; 11) Major procurement solicitation notices issued, and name of vendor and contract amount awarded; and 12) Recruitment of staff and employees.	1) Institutional information -Board of Governors -Board of Directors -Bank Management -Strategy, Annual Plans and Budget -Annual Reports -Basic Documents -Employment information (basic salary structure) 2) Operational information -Project documents -Environmental and Social Information -Procurement 3) Financial information -Financial statements	- Board of Governors proceedings; - Board proceedings;	-Information about UNDP Country Programme Management -Information about UNDP Operations	1) Reports of each Assembly and Council meeting, together with the full text of all decisions… and accompanying documents; 2) List of current participants in all of IRENA's governance processes; 3) Rules and Procedures of the Assembly, Council, and all subsidiary bodies; 4) Work Program and Budget, and implementation updates issued by the Secretariat.

Medium of disclosure	"...records shall be posted on the GGGI's website within 30 working days of their issuance."	"Public information is accessible, wherever feasible, through posting on the Bank's website"	Bank's external website	Websites: "Country specific documentation is available from the appropriate Regional and Central *Bureaux*, Country office websites and UNDP Transparency Portal"	"…posted on IRENA's website"
Exceptions	1) Information received from or provided to the GGGI by its Members or other third parties with a request that the information be maintained as confidential or where there exists a compelling reason to consider such information confidential, as to be determined by the Secretariat. Such information includes intellectual property, business proprietary, or other protected information submitted by third parties, properly disclosed to the GGGI and accepted by the GGGI for confidential treatment; 2) Records relating to internal deliberative processes, including internal notes, memoranda and correspondence among the GGGI Secretariat staff, except as appropriate for the purpose of soliciting expert input with institutions and individuals other than the GGGI Secretariat staff; 3) Information covered by legal privilege, including information relating to legal advice and matters in legal dispute or under negotiation, or regulatory proceedings, or that subjects the GGGI to an undue risk of litigation, or is related to internal audits and investigations; 4) Personal or employment-related information about the GGGI staff, other than information included in the work program and budget; 5) Information related to procurement processes which involve prequalification information submitted by prospective bidders, proposals or price quotations, or records of deliberative processes; 6) Recordings of meetings of the Assembly, Council or any subsidiary body held in closed session; 7) Information whose disclosure is likely to endanger the safety or security of any individual, violate his or her rights, or invade his or her privacy; 8) Information whose disclosure is likely to endanger the security of the Members or prejudice the security or proper conduct of any operation or activity of the GGGI; 9) Commercial information, if disclosure would harm either the financial interests of the GGGI or those of other parties involved; 10) Information which the GGGI believes would, if disclosed, seriously undermine a policy dialogue with a Member, prospective Member, or an implementing partner; and 11) Other kinds of information which, because of its content or the circumstances of its creation or communication, must be deemed confidential, as to be determined by GGGI senior management.	"...there are some instances where disclosure could cause harm to specific parties or interests. In line with the practices of other international financial institutions, the Bank does not provide access to the types of confidential information listed below: 1) Personal information 2) Safety and security 3) Privileged and investigative information 4) Third-party information and proprietary information 5) Deliberative information 6) Financial information 7) Violation of national laws or other applicable regulations 8) Corporate administration	"The Bank does not provide access to information whose disclosure could cause harm to specific parties or interests. Accordingly, the Bank does not provide access to documents that contain or refer to the information listed: 1) Personal information 2) Communications of Governors and/or Executive Directors' Offices 3) Ethics Committee 4) Attorney-Client Privilege 5) Security and Safety 6) Information restricted under separate disclosure regimes and other investigative information 7) Information provided by member countries or third parties in confidence 8) Corporate administrative matters 9) Deliberative information 10) Financial information	1) Information received from or sent to third parties, under an expectation of confidentiality; 2) Information whose disclosure is likely to endanger the safety or security of any individual, violates his or her rights, or invades his or her privacy; 3) Information whose disclosure is likely to endanger the security of Member States or prejudice the security or proper conduct of any operation or activity of UNDP; 4) Information covered by legal privilege or related to access of individual investigation cases; 5) Information on UNDP's own internal deliberations, communications, and UNDP deliberations with Member States or other entities with which UNDP works; 6) Commercial information where disclosure would harm either the financial interests of UNDP or those of third parties involved; 7) Information which, if disclosed, in UNDP's view would seriously undermine the policy dialogue with Member States or implementing parties.	1) Records relating to internal deliberative process…; 2) Information provided to IRENA by its Members or other entities with a request that the information be maintained as confidential, or where it is reasonable to conclude that the information was provided with an expectation of confidentiality; 3) Privileged information relating to legal advice and matters in legal dispute; 4) Personal or employment-related information; 5) IP, business proprietary or other protected information submitted by third parties… 6) Information related to procurement processes which involve prequalification information submitted by prospective bidders… 7) Recordings of meetings of the Assembly, Council or any other subsidiary body held in closed session.

How to request information	"Requests should be directed to: Hyoeun Jenny Kim Director Strategy, Policy and Communications Email: jenny.kim@gggi.org"	"Requests for information may be submitted to the Director General, Communications and Development through the website, or by mail and fax"	*Access to Information Committee:* "To facilitate the AI Policy's implementation, the AI Committee is an administrative body that reports to Bank management and advises management on the application of this Policy to complex issues, reviews proposals to disclose information that is on the list of exceptions, receives and rules on appeals under this Policy, establishes service fees and service standards, and issues guidelines to staff on policy implementation."	"In exceptional circumstances, UNDP reserves the right to disclose the information deemed confidential in paragraph 11. The Independent Information Disclosure Oversight Panel will consider the requests…"	*Process is NOT specified:* "Subject only to the exceptions set out below and the requirements of applicable law, all other IRENA records shall be provided upon request of any person."
Appeals process	"If a request is denied, the requestor may seek the review of the decision by addressing a letter to the GGGI Deputy Director-General for Management and Administration. The Deputy Director-General for Management and Administration will review the handling of the request for information and make a determination on how to proceed. The outcome of the review will be communicated to the requestor and there will be no requirement for providing a detailed explanation of the outcome of the review."	"If a requester believes that a request for information has been unreasonably denied, an appeal may be submitted to the Corporate Secretary. The Corporate Secretary will make appropriate arrangements for impartial review of the appeal by a designated review officer. The Corporate Secretary will review the review officer's recommendation in consultation with the General Counsel and other members of the senior management; the decision of the Corporate Secretary on the recommendation will be final."	1)"A requester who is denied access to information by the Bank may file an appeal…" 2) The two stages appeals mechanism consists of the following: - Appealing the initial denial - Access to Information Committee - Appealing the AI Committee's denial – Appeals Board	1)"…the requester may write to the Legal Office, making a case for reconsideration. Requests should be directed to: [address; email]." 2) "In the event that the requester is not satisfied with the response from the Legal Office, and a request for a document remains denied in whole or in part, the requester may ask for a review of this determination by the Independent Information Disclosure Oversight Panel, providing reasons for the appeal. Requests for appeals should be directed to: [address + email]."	Not specified
Availability of contact info/focal point for enquiries	Yes; (Jenny/Director of SPC)	Names the "Director General, Communications and Development, advised by the General Counsel and other members of the senior management" as focal point to implement the policy but does not provide contact information.	Names the "Vice President, External and Corporate Relations" as the sponsor of the Policy, but no contact info provided.	Yes (address and email info for requests)	No
Misc	-	"The Bank's Management will provide a review of the implementation of this *Interim* Policy to the Board of Directors annually."	Has a "declassification" process (disclosure over time): "The Bank declassifies and discloses – routinely on the Bank's external website, and in response to requests – certain types of restricted information as their sensitivity diminishes over time. Some restricted information is not eligible for declassification."	-Has a "transparency portal" containing information/ statistical data about projects -Information Disclosure Oversight Panel;	-

Table 2. Proposed Revisions to the GGGI's Disclosure Policy

GGGI Disclosure Policy [C/5/DC/2] adopted by the Council at its Fifth Session on June 19, 2014	Proposed revised text	Comment
The Global Green Growth Institute (hereinafter "GGGI") is committed to operating in a transparent and accountable manner, and in accordance with the principles set out in Article 13 of the Agreement on the Establishment of the GGGI. It is the policy of the GGGI to publicly disclose information concerning its decisions and operational activities in the absence of a compelling reason to consider such information as confidential. This Disclosure Policy (hereinafter the "Policy") is based on the premise that public access to information is a key component of effective participation of all stakeholders and will increase understanding and support of the GGGI's mission. **I. Scope** This Policy applies to all recorded information in possession of or maintained by the GGGI.	**I. Purpose** 1. The Global Green Growth Institute (hereinafter "GGGI") has been established to promote sustainable development of developing and emerging countries, including the least developed countries. 2. GGGI is committed to operating in a transparent and accountable manner. This commitment is explicitly recognized in Article 13 of the Agreement on the Establishment of the GGGI and part of GGGI's Accountability Framework. 3. It is the policy of the GGGI to publicly disclose information concerning its governance organs and their decisions as well as operational activities in the absence of a compelling reason to consider such information as proprietary, privileged or confidential. 4. This Disclosure Policy (hereinafter "Policy") is based on the premise that public access to information is a key component of effective engagement and meaningful participation of all stakeholders and will increase understanding and support of GGGI's mission. 5. The Policy sets out guiding principles, the categories of information to be made public, the types of information to be treated as proprietary, privileged, or confidential, as well as provisions for implementation. 6. The Policy applies to all recorded information in possession of or maintained by the GGGI. Information is defined as including printed and electronic materials.	Reference be included as to what GGGI is about, drawn from the Establishment Agreement. The Establishment Agreement does not actually establish principles in Article 13, it sets out what should be disclosed by GGGI. Propose the inclusion of this paragraph to provide an overview of the content of the Policy.

	II. Guiding Principles 7. This Policy is based on the following principles, a. Promoting transparency and accountability, in the absence of a compelling reason to consider information as proprietary, privileged, or confidential; b. Safeguarding deliberative processes and protecting confidentiality; c. Providing clear procedures for making information available; d. Recognizing requesters' right to an internal review process.	Propose the inclusion of "guiding principles" for the Policy. This is line with the practice of many other organizations, including AIIB, World Bank, etc.
II. Disclosure Categories ***1. Records to be posted on the GGGI's website*** Subject to the exceptions set out below and the requirements of applicable law, the following records shall be posted on the GGGI's website within 30 working days of their issuance: 1. The final discussions, decisions and documents received, reviewed and adopted by the Assembly, Council and subsidiary bodies; 2. The criteria on which non-state entities are granted Observer status; 3. The criteria on which experts and non-state actors in the Council are selected; 4. The criteria on which the members of the Advisory Committee are approved; 5. List of current participants in all of the GGGI's statutory organs; 6. The criteria and methodology for country program selection; 7. The GGGI's rules and procedures, including Rules of Procedure of the Assembly, Council, Advisory Committee and subsidiary bodies; 8. The GGGI's annual audited financial statements;	**III. Public Information** 8. The following records shall be posted on GGGI's website updated on a periodic basis.: a. The list of Members, and their status as either Contributing or Participating Members; b. The criteria on which Experts and Non-State Actor members of the Council are selected; c. The list of Members and Expert/Non-State Actors to the GGGI Assembly and Council; d. The criteria on which non-members and non-state entities are granted Observer status by the Assembly; e. The Rules of Procedure of GGGI's statutory governance organs, and their subsidiary bodies; f. The regulations and rules of GGGI, including those on financial, human resources, and procurement; g. The criteria and methodology for country program selection; h. The final documents and decisions received, reviewed, and adopted by the Assembly, Council, and subsidiary bodies within 30 working days of their adoption; i. Annual amount of core and earmarked contributions received and the use of contributions;	Reference to within 30 working days does not work with each and every information category below. Several other documents have been included in the disclosure documents reflecting other developments – namely the strategic plan and country planning frameworks Suggest reference to "contribution" rather than donation.

9. Annual amount of donation received and the use of donated funds; 10. Final documents on the annual work program and budget, and project implementation updates issued by the Secretariat; 11. Major procurement solicitation notices issued, and name of vendor and contract amount awarded; and, 12. Recruitment of staff and employees.	j. GGGI's strategic plan approved by Council and individual Country Planning Frameworks agreed by GGGI and the respective country; k. GGGI's work program and budget, and project implementation updates issued by the Secretariat; l. GGGI's annual audited financial statements, approved by the Council; m. For procurement with value above USD100,000, solicitation notices issued, and the name of vendor and contract amount awarded; and, n. Recruitment advertisements for externally posted GGGI positions, as well as the list of persons working at GGGI.	Propose including as to what constitutes major procurement, in accordance with Procurement Regulations and Rules.
2. Records to be disclosed upon request Subject to the exceptions set out below and the requirements of applicable law, all other GGGI records shall be made available upon request, as and when they are developed and become available.		This information is covered in the section "Processing of Information Requests"
III. Exceptions Pursuant to section IV, the following information shall not be disclosed to the public: 1. Information received from or provided to the GGGI by its Members or other third parties with a request that the information be maintained as confidential or where there exists a compelling reason to consider such information confidential, as to be determined by the Secretariat. Such information includes intellectual property, business proprietary, or other protected information submitted by third parties, properly disclosed to the GGGI and accepted by the GGGI for confidential treatment; 2. Records relating to internal deliberative processes, including internal notes, memoranda and correspondence among the GGGI Secretariat staff, except as appropriate for the purpose of soliciting expert input with institutions and individuals other than the GGGI Secretariat staff;	**IV. Exceptions** 9. The following information shall not be disclosed to the public: a. Information received from or provided to GGGI by its Members or other third parties with a request that the information be maintained as confidential or where there exists a compelling reason to consider such information proprietary or confidential, as to be determined by GGGI. Such information includes intellectual property, business proprietary, or other protected information submitted by third parties, properly disclosed to GGGI and accepted by GGGI for confidential treatment; b. Records relating to internal deliberative processes, including internal notes, memoranda, and correspondence among GGGI staff, except as appropriate for the purpose of soliciting expert input	

3. Information covered by legal privilege, including information relating to legal advice and matters in legal dispute or under negotiation, or regulatory proceedings, or that subjects the GGGI to an undue risk of litigation, or is related to internal audits and investigations; 4. Personal or employment-related information about the GGGI staff, other than information included in the work program and budget; 5. Information related to procurement processes which involve prequalification information submitted by prospective bidders, proposals or price quotations, or records of deliberative processes; 6. Recordings of meetings of the Assembly, Council or any subsidiary body held in closed session; 7. Information whose disclosure is likely to endanger the safety or security of any individual, violate his or her rights, or invade his or her privacy; 8. Information whose disclosure is likely to endanger the security of the Members or prejudice the security or proper conduct of any operation or activity of the GGGI; 9. Commercial information, if disclosure would harm either the financial interests of the GGGI or those of other parties involved; 10. Information which the GGGI believes would, if disclosed, seriously undermine a policy dialogue with a Member, prospective Member, or an implementing partner; and 11. Other kinds of information which, because of its content or the circumstances of its creation or communication, must be deemed confidential, as to be determined by GGGI senior management. If a record contains both disclosable and non-disclosable information, the GGGI may decide, at its discretion, to redact the non-disclosable information and disclose the remaining record. If the text of a document would not be appropriate for public release with redacted treatment, an abstract will be prepared and released in its place, if appropriate.	with institutions and individuals other than GGGI staff; c. Information covered by legal privilege, including information relating to legal advice and matters in legal dispute or under negotiation, or regulatory proceedings, or that subjects GGGI to an undue risk of litigation, or is related to internal audits and investigations; d. Personal or employment-related information about GGGI personnel, other than information contained in the work program and budget; e. Information related to procurement processes which involve prequalification information submitted by prospective bidders, proposals or price quotations, or records of deliberative processes; f. Deliberative processes and recordings of meetings of the Assembly, Council, or any subsidiary body held in closed session; g. Information whose disclosure is likely to endanger the safety or security of any individual, violate his or her rights, or invade his or her privacy; h. Information whose disclosure is likely to endanger the security of the Members or prejudice the security or proper conduct of any operation or activity of GGGI; i. Commercial information, if disclosure would harm either the financial interests of GGGI or those of other parties involved; j. Information which GGGI believes would, if disclosed, seriously undermine a policy dialogue with a Member, prospective Member, or an implementing partner; and k. Other kinds of information which, because of its content or the circumstances of its creation or communication, must be deemed non-disclosable, as to be determined by GGGI. 10. If a record contains both disclosable and non-disclosable information, GGGI may decide, at its discretion, to redact the non-disclosable information and disclose the remaining record.	This has been introduced to cover the activities of the Council Sub-Committees.

	11. If the text of a document would not be appropriate for public release with redacted treatment, an abstract will be prepared and released in its place, if appropriate. 12. GGGI may decide, in its discretion, to refuse unreasonable or unsupported requests, including multiple requests, blanket requests, and any request that would require GGGI to create, develop, or collate information or data that does not already exist or is not available in GGGI records.	
IV. Disclosure of Information to Members For the purpose of this Policy, Members of the GGGI and their representatives shall not be considered members of the public and shall, at their written request, be provided access to the same information available to the GGGI Secretariat staff, subject to approval based on a recommendation from the Director-General to the Chair of the Council.	**IV. Disclosure of Information to Members** 13. For the purpose of this Policy, Members of the GGGI and their representatives shall not be considered members of the public and shall, at their written request, be provided access to the same information available to the GGGI Secretariat staff, subject to approval based on a recommendation from the Director-General to the Chair of the Council.	
V. Privileges and Immunities of the GGGI Nothing in or relating to this Policy will be deemed a waiver, express or implied, of any of the privileges and immunities of the GGGI that it may enjoy under any national law or international law, or any agreement between any parties. Without limiting the generality of the previous sentence, the disclosure of information in response to a request for disclosure will not constitute a waiver, express or implied, of any of the privileges and immunities of the GGGI that it may enjoy under any national law or international law, or any agreement between any parties.	**V. Privileges and Immunities of GGGI** 14. Nothing in or relating to this Policy will be deemed a waiver, express or implied, of any of the privileges and immunities of GGGI that it may enjoy under any national law or international law, or any agreement between any parties. Without limiting the generality of the previous sentence, the disclosure of information in response to a request for disclosure will not constitute a waiver, express or implied, of any of the privileges and immunities of GGGI that it may enjoy under any national law or international law, or any agreement between any parties.	
VI. Processing of Information Requests 1. Any person or organization may request the disclosure of non-confidential information. 2. Requests should be directed to: Hyoeun Jenny Kim	**VI. Processing of Information Requests** 15. Any person or organization may request the disclosure of non-confidential information. Requests should be directed to the Head of Communications at GGGI's Headquarters	Remove the name of the individual whom members of the

Director Strategy, Policy and Communications E-mail: jenny.kim@gggi.org 3. The requester is entitled to a preliminary response from the GGGI Secretariat within 15 working days of receipt of the request and an estimate of the time required for a full response. 4. For information requests that involve the reproduction of material, the GGGI may charge a fee for material and labor cost, which will be communicated to the requestor and will need to be paid in advance. 5. The GGGI may partially or wholly deny a request, as follows: a. In accordance with the limitations set out or referred to in this Policy; b. If the request is deemed by the GGGI to be an excessive demand upon the GGGI's resources; or, c. If the request, in the judgment of the GGGI, appears to be frivolous. 6. If a request is denied, the requestor may seek the review of the decision by addressing a letter to the GGGI Deputy Director-General for Management and Administration. The Deputy Director-General for Management and Administration will review the handling of the request for information and make a determination on how to proceed. The outcome of the review will be communicated to the requestor and there will be no requirement for providing a detailed explanation of the outcome of the review.	Republic of Korea Email: accesstoinformation@gggi.org 16. The requester is entitled to a preliminary response from GGGI within fifteen (15) working days of receipt of the request and an estimate of the time required for a full response. 17. For information requests that involve the reproduction of material, the GGGI may charge a fee for material and labor cost, which will be communicated to the requestor and will need to be paid in advance. 18. GGGI may partially or wholly deny a request, as follows: a. In accordance with the limitations set out or referred to in this Policy; b. If the request is deemed by GGGI to be an excessive demand upon GGGI resources; or, c. If the request, in the judgment of GGGI, appears to be frivolous. 19. In the event that the requestor is not satisfied with the response or if a request is denied, either in full or in part, the requestor may seek the review of the decision by addressing a letter to Director of Strategy, Partnerships, Communications, Office of the Director-General Email: spc@gggi.org 20. The Director will review the handling of the request for information and make a determination on how to proceed. The outcome of the review will be communicated to the requestor and there will be no requirement for GGGI to provide a detailed explanation of the outcome of the review.	public may contact, and providing only an office. Propose a generic email address be created and administered to receive requests for information. Proposed that this be the Head of Communications. A generic email address will be created and administered to receive requests for information.
VII. Reproduction of information The implementation of this Policy will be subject to existing rules on intellectual property and other proprietary rights including, but not limited to, patents, copyrights, and trademarks, which may,	**VII. Reproduction of Information** 21. The implementation of this Policy will be subject to existing rules on intellectual property and other proprietary rights including, but not limited to, patents, copyrights, and	

inter alia, limit a third party's right to reproduce or exploit information.	trademarks, which may, inter alia, limit a third party's right to reproduce or exploit information.	
VIII. Disclaimer No representation is made or warranty given, express or implied, as to the completeness or accuracy of information made available by the GGGI. The requestor shall apply discretion when using the information made available by the GGGI. The GGGI will not be liable for any direct or indirect loss arising from the use of the information.	**VIII. Disclaimer** 22. No representation is made or warranty given, express or implied, as to the completeness or accuracy of information made available by GGGI. The requestor shall apply discretion when using the information made available by GGGI. GGGI will not be liable for any direct or indirect loss arising from the use of the information.	
	IX. Reporting and Periodic Review 23. GGGI shall report annually to the Council on the implementation of and compliance with this Policy, and explaining any reasons for non-compliance. 24. GGGI will periodically review the adequacy of this Policy in line with other international organizations at least once every five (5) years, to ensure that the Policy is in accordance with international good practice.	Propose the inclusion of this section as a good practice to demonstrate to the Council of GGGI's commitment to transparency.
IX. Effective period This Policy shall become effective on 19 June 2014.	**X. Effective Period** 25. This Policy shall become effective on October 31, 2018.	

/End

Global Green Growth Institute

Global Green Growth Institute
Seventh Session of the Assembly and
Eleventh Session of the Council (Joint Session)
October 31, 2017; Seoul, Republic of Korea

[DRAFT] Decision on the Disclosure Policy

The Council,

Taking note of the Paris Declaration and Accra Agenda for Action and the commitment therein for accountability of results and transparency in the use of development resources to support mutual accountability, achieved through the provision of timely, transparent and comprehensive information on aid flows so as to enable partner authorities to present comprehensive budget reports to their legislatures and citizens;

Acting pursuant to Article 13 of the Agreement on the Establishment of the Global Green Growth Institute, stating that the organs of the Global Green Growth Institute shall develop a comprehensive disclosure policy which ensures transparency in GGGI's work;

Acknowledging the core values of GGGI including integrity and upholding high accountability and transparency standards as reflected in the Refreshed Strategic Plan 2015-2020 approved by the Council at is Tenth Session that took place on October 19, 2017 [MPSC/2017/28/REV2];

Noting transparency and accountability are key elements of GGGI's Accountability Framework, which is designed to allow stakeholders to hold GGGI accountable against obligations and commitments.

Noting the discussions on enhancing GGGI's transparency at the Sixth Meeting of the Management and Program Sub-Committee on July 4-5, 2017 [MPSC/2017/31];

Taking note of the review of GGGI's existing Transparency Policy to ensure it is fit for purpose and aligned with good practice of other international organizations tabled at the Eleventh Session of the Council on October 31, 2018 [A/2018/8 – C/2018/8];

Acknowledging the actions undertaken by GGGI to improve its results reporting through the introduction of both corporate and project-level results reporting to Members and other stakeholders through its annual report; to adopt the International Aid Transparency Initiatives Reporting Standard; and to refresh its website during 2017 and 2018;

Consistent with GGGI's Disclosure Policy [C/5/DC/2], this document will be disclosed on the GGGI Website upon its approval by the Council, and its classification will be changed from "For Official Use" to "General Distribution".

Approves the Disclosure Policy, as attached in Annex 1 which *supersedes and replaces* in its entirety the following:

1. Decision on the Disclosure Policy [C/5/DC/3] adopted by the Council at its Fifth Session on June 19-20, 2014; and
2. Decision on the Disclosure Policy [C/2/DC/7] and the Disclosure Policy [C/2/9] adopted by the Council at its Second Session on January 17, 2013.

DISCLOSURE POLICY

Effective Date – October 31, 2018

Global Green Growth Institute

Purpose

1. The Global Green Growth Institute (hereinafter "GGGI") has been established to promote sustainable development of developing and emerging countries, including the least developed countries.

2. GGGI is committed to operating in a transparent and accountable manner. This commitment is explicitly recognized in Article 13 of the Agreement on the Establishment of the GGGI and part of GGGI's Accountability Framework.

3. It is the policy of the GGGI to publicly disclose information concerning its governance organs and their decisions as well as operational activities in the absence of a compelling reason to consider such information as proprietary, privileged or confidential.

4. This Disclosure Policy (hereinafter "Policy") is based on the premise that public access to information is a key component of effective engagement and meaningful participation of all stakeholders and will increase understanding and support of GGGI's mission.

5. The Policy sets out guiding principles, the categories of information to be made public, the types of information to be treated as proprietary, privileged, or confidential, as well as provisions for implementation.

6. The Policy applies to all recorded information in possession of or maintained by the GGGI. Information is defined as including printed and electronic materials.

Guiding Principles

7. This Policy is based on the following principles,

    a. Promoting transparency and accountability, in the absence of a compelling reason to consider information as proprietary, privileged, or confidential;
    b. Safeguarding deliberative processes and protecting confidentiality;
    c. Providing clear procedures for making information available;
    d. Recognizing requesters' right to an internal review process.

Public Information

8. The following records shall be posted on GGGI's website updated on a periodic basis.:

    a. The list of Members, and their status as either Contributing or Participating Members;
    b. The criteria on which Experts and Non-State Actor members of the Council are selected;
    c. The list of Members and Expert/Non-State Actors to the GGGI Assembly and Council;
    d. The criteria on which non-members and non-state entities are granted Observer status by the Assembly;
    e. The Rules of Procedure of GGGI's statutory governance organs, and their subsidiary bodies;

f. The regulations and rules of GGGI, including those on financial, human resources, and procurement;
g. The criteria and methodology for country program selection;
h. The final documents and decisions received, reviewed, and adopted by the Assembly, Council, and subsidiary bodies within 30 working days of their adoption;
i. Annual amount of core and earmarked contributions received and the use of contributions;
j. GGGI's strategic plan approved by Council and individual Country Planning Frameworks agreed by GGGI and the respective country;
k. GGGI's work program and budget, and project implementation updates issued by the Secretariat;
l. GGGI's annual audited financial statements, approved by the Council;
m. For procurement with value above USD100,000, solicitation notices issued, and the name of vendor and contract amount awarded; and,
n. Recruitment advertisements for externally posted GGGI positions, as well as the list of persons working at GGGI.

Exceptions

9. The following information shall not be disclosed to the public:

a. Information received from or provided to GGGI by its Members or other third parties with a request that the information be maintained as confidential or where there exists a compelling reason to consider such information proprietary or confidential, as to be determined by GGGI. Such information includes intellectual property, business proprietary, or other protected information submitted by third parties, properly disclosed to GGGI and accepted by GGGI for confidential treatment;
b. Records relating to internal deliberative processes, including internal notes, memoranda, and correspondence among GGGI staff, except as appropriate for the purpose of soliciting expert input with institutions and individuals other than GGGI staff;
c. Information covered by legal privilege, including information relating to legal advice and matters in legal dispute or under negotiation, or regulatory proceedings, or that subjects GGGI to an undue risk of litigation, or is related to internal audits and investigations;
d. Personal or employment-related information about GGGI personnel, other than information contained in the work program and budget;
e. Information related to procurement processes which involve prequalification information submitted by prospective bidders, proposals or price quotations, or records of deliberative processes;
f. Deliberative processes and recordings of meetings of the Assembly, Council, or any subsidiary body held in closed session;
g. Information whose disclosure is likely to endanger the safety or security of any individual, violate his or her rights, or invade his or her privacy;
h. Information whose disclosure is likely to endanger the security of the Members or prejudice the security or proper conduct of any operation or activity of GGGI;
i. Commercial information, if disclosure would harm either the financial interests of GGGI or those of other parties involved;

j. Information which GGGI believes would, if disclosed, seriously undermine a policy dialogue with a Member, prospective Member, or an implementing partner; and
k. Other kinds of information which, because of its content or the circumstances of its creation or communication, must be deemed non-disclosable, as to be determined by GGGI.

10. If a record contains both disclosable and non-disclosable information, GGGI may decide, at its discretion, to redact the non-disclosable information and disclose the remaining record.

11. If the text of a document would not be appropriate for public release with redacted treatment, an abstract will be prepared and released in its place, if appropriate.

12. GGGI may decide, in its discretion, to refuse unreasonable or unsupported requests, including multiple requests, blanket requests, and any request that would require GGGI to create, develop, or collate information or data that does not already exist or is not available in GGGI records.

Disclosure of Information to Members

13. For the purpose of this Policy, Members of the GGGI and their representatives shall not be considered members of the public and shall, at their written request, be provided access to the same information available to the GGGI Secretariat staff, subject to approval based on a recommendation from the Director-General to the Chair of the Council.

Privileges and Immunities of GGGI

14. Nothing in or relating to this Policy will be deemed a waiver, express or implied, of any of the privileges and immunities of GGGI that it may enjoy under any national law or international law, or any agreement between any parties. Without limiting the generality of the previous sentence, the disclosure of information in response to a request for disclosure will not constitute a waiver, express or implied, of any of the privileges and immunities of GGGI that it may enjoy under any national law or international law, or any agreement between any parties.

Processing of Information Requests

15. Any person or organization may request the disclosure of non-confidential information.

    Requests should be directed to the Head of Communications at GGGI's Headquarters
    Republic of Korea
    Email: accesstoinformation@gggi.org

16. The requester is entitled to a preliminary response from GGGI within fifteen (15) working days of receipt of the request and an estimate of the time required for a full response.

17. For information requests that involve the reproduction of material, the GGGI may charge a fee for material and labor cost, which will be communicated to the requestor and will need to be paid in advance.

18. GGGI may partially or wholly deny a request, as follows:

    a. In accordance with the limitations set out or referred to in this Policy;
    b. If the request is deemed by GGGI to be an excessive demand upon GGGI resources; or,
    c. If the request, in the judgment of GGGI, appears to be frivolous.

19. In the event that the requestor is not satisfied with the response or if a request is denied, either in full or in part, the requestor may seek the review of the decision by addressing a letter to:

    Director, Strategy, Policy and Communications Department
    Email: spc@gggi.org

20. The Director will review the handling of the request for information and make a determination on how to proceed. The outcome of the review will be communicated to the requestor and there will be no requirement for GGGI to provide a detailed explanation of the outcome of the review.

Reproduction of Information

21. The implementation of this Policy will be subject to existing rules on intellectual property and other proprietary rights including, but not limited to, patents, copyrights, and trademarks, which may, inter alia, limit a third party's right to reproduce or exploit information.

Disclaimer

22. No representation is made or warranty given, express or implied, as to the completeness or accuracy of information made available by GGGI. The requestor shall apply discretion when using the information made available by GGGI. GGGI will not be liable for any direct or indirect loss arising from the use of the information.

Reporting and Periodic Review

23. GGGI shall report annually to the Council on the implementation of and compliance with this Policy and explaining any reasons for non-compliance.

24. GGGI will periodically review the adequacy of this Policy in line with other international organizations at least once every five (5) years, to ensure that the Policy is in accordance with international good practice.

Effective Period

25. This Policy shall become effective on October 31, 2018.