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WEBINAR

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P R O C E E D I N G S

MR. INGRAM: Welcome, everyone. Today's event is a collaboration between the Center for Sustainable Development at the Brookings Institution and Publish What You Fund. Brookings is an independent policy research organization in Washington, D.C. and Publish What You Fund is a London-based nonprofit that engages in research, policy development and advocacy on data transparency and development cooperation.

I am a senior fellow at the Brookings' Center for Sustainable Development and serve as chair of the U.S.-based friends of Publish What You Fund.

The purpose of today's program is to advance the conversation of how to deepen the transparency that is the public availability of information of development finance which is the combined use of public and private funds to support commercial investment projects in developing countries.

The catalyst for today's discussion is the release of report on development finance transparency by Publish What You Fund along with its newly developed transparency tool. Our program today has three parts. It will begin with keynote remarks by Rob Mosbacher, a business entrepreneur who served as President of the Overseas Private Investment Corporation in the early 2000s and is currently chair of the advisory council for the successor to OPIC, the development finance corporation and also chairs the advisory board for this research project.

Secondly, a presentation on the draft transparency tool for reporting on development finance by Gary Forster, the CEO of Publish What You Fund. And thirdly, a panel discussion of DFI and civil society experts.

Why the focus on transparency? I will give four reasons. One, it provides citizens in developing countries with information on what is happening. On how far an assistance in private investment is being used in their country and is the basis for accountability to local custody.

Secondly, it provides citizens and shareholders in the donor countries with information to measure how and whether development finances are achieving its goals. Thereby serving both to build understanding and support and again as a means of accountability.

Thirdly, it provides information to DFIs about what they are doing and accomplishing to identify how and where they can work together as well as to learn from each other.

Fourthly, it provides information to perspective business investors so they can better understand where and how they might partner with a DFI and act on the information on market opportunities and dynamics in developing countries.

With that introduction, let me turn to Rob. Rob, you're on mute.

MR. MOSBACHER: Sorry. All right. Delighted to be part of this and thank you very much for the introduction, George.

Yes, as George mentioned, my name is Rob Mosbacher and I served as president and CEO of the Overseas Private Investment Corporation from 2005 to 2009. I was also very actively involved in the drafting and passage of the Build Act which created the U.S. Development Finance Corporation.

For the past two years, I have had the pleasure of chairing the public advisory board for this initiative. And I'm delighted to be here today for this launch. However, as the Publish What You Fund team will tell you at the start of the initiative, I had some very serious reservations. Although, there is no question that DFIs must be more transparency in their disclosures on projects particularly as we rely more heavily on private capital and development finance to achieve the SDGs.

I was concerned about how vigorous or aggressive this pursuit might be. Unfortunately, there is very little pressure from the boards and stakeholders of various DFIs to significantly increase transparency. And one can envision a situation in which if expectations are set too high and the recommendation requirements for disclosure are considered too burdensome by either the DFIs or their business clients then they can simply ignore the recommendations or adopt the easiest parts.

In short, the team has had to constantly balance what is ideal with what is possible and realistic. In general, I think they've done and excellent job of that. While the expectations they've set for greater DFI transparency are high, I believe they are realistic about the time it will take to adopt new standards.

Moreover, they have provided a very practical tool that DFIs can incorporate to help harmonize disclosures practices across the sector. Before they explain all this to you, there are a couple of general observations I want to make based upon the inquiries they have made, the data that they have collected and the in-depth analysis that the team has done.

First, the current level of disclosure among DFIs is surprisingly low. There are a few exceptions, but in general most DFIs have quite a way to go before they can claim that they are operating in as transparent a manner as possible. As a private sector businessman and owner and operator, I understand concerns about disclosure of proprietary or confidential business information. However, the team's research shows that not only are many business clients of DFI willing to disclose more information regarding those transactions, but much of the purportedly confidential information can be found in the public domain.

When I purchase political risk insurance for OPIC almost 30 years ago, I assumed that doing business with a private sector entity would entail some level of disclosure that would not be the case with a purely private sector business. I think sometimes nondisclosure agreements are used as an excuse to avoid the release of pertinent project information. And I believe a move toward more transparency among DFIs can be accomplished without compromising what private sector businesses consider truly confidential.

Is it greater transparency among DFIs is not just desirable, it's essential in this day and time? We're living in a world in which official development assistance has plateaued if not declined. The global effort to reduce poverty will increasingly depend upon private capital flows. And the degree to which DFIs and facilitate greater investment in low and lower middle-income countries.

Greater transparency is essential because we're talking about the expenditure of public resources. And it is very difficult, if not impossible, to know what DFIs are actually accomplishing with the current level of disclosure. It's hard to discern what works and at what cost unless there is a more standardized or harmonized way of disclosing data.

If you're on the board of one of the DFIs or a key stakeholder, you should want much more information about the development impact of the projects that are being financed and whether you're crowding out or crowding in more private sector capital. Are DFIs keeping up with the rapidly evolving focus on environmental, social and governance standards in the private sector? And if so, how?

Finally, we're in the global competition over models of development. One approach suggests that economic growth can be accomplished through project financing which is secretly negotiated and largely hidden from public scrutiny or view. The other model insists upon open, transparent competition for projects in which the ultimate terms of the transaction are made public.

It is that latter model which most DFIs embrace. And it is incumbent upon those of us who promote that model to the rest of the world to set an example of what real transparency and disclosure looks like, and why that must become the norm rather than the exception.

I've seen firsthand the extraordinary impact that DFIs can have. I've seen the jobs and opportunities which they can create. The products and services that they can provide and the major changes in access to electricity and water which can come with big infrastructure projects.

But we must not limit ourselves to thinking that the positive impact of DFIs should reside only in their investments. Rather we should also think of them as models of best practices and how to investment in finance, economic growth. And as providers of practical market information that will encourage and enable others to invest.

The team at Publish What You Fund have proven themselves a constructive critic of a transparency more broadly. And now, by collaborating with DFIs, the private sector and civil society, they have provided a roadmap to move the whole DFI sector forward. They know that a number of leading DFIs are clamoring for a granular definition of transparency. One that they can operationalize and could improve the availability, timeliness and comparability of investment in policy information. That doesn't mean it's easy and that all of the DFIs will be able to provide all the data that is sought.

However, I believe this report and the DFI transparency tool are a huge step forward in the process. I'm excited to listen to our panel today. Throughout this initiative, we have tried to listen to as many stakeholders as possible across think tanks, civil society organizations, the private sector and of course DFIs. Today will be no different. So I'm looking forward to the robust conversation. Gary, over to you.

MR. FORSTER: Thank you, Rob. Welcome, everybody. My name is Gary Forster and I'm a CEO of Publish What You Fund. I've been working on that DFI transparency initiative since its inception, so I'm delighted to be here today to be part of the launch of this work.

George and Rob have done a great job of laying out why DFI transparency matters, and they've explained the findings and recommendations arising out of our research.

What I'm going to do is tell you how we got here. Especially for those of you who haven't been part of this journey over the past two years. And then I'm going to give you a brief introduction to the DFI transparency tool itself.

As Rob said, we started this initiative because stakeholders including DFIs themselves were seeking to move the transparency debate from one based on principles and high-level commitments to one based on a granular definition of what data transparency should be. The goal is to identify the key fields of information which stakeholders need, then to define those fields and then to encourage disclosure in a timely and comparable way across the world's major DFIs.

The first step was to breakdown the universal information into manageable chunks. All over seen by our project advisory board, we ended up with five workstreams. The first was on basic product information and the second on impact management, which included objectives, theories of change and impact.

The third workstream was on environmental, social and governance and the accountability to communities. The fourth, value of investment, mobilization, and structure of the deal. And the fifth workstream focused on financial intermediaries.

The next step was to assemble expert working groups. Individuals from think tanks, civil society, the private sector and DFIs themselves to help us understand each of these areas and develop frameworks for defining them.

Next, we mapped current DFI disclosure practices for each workstream. Identifying what information was being shared and how by the leading 20 or so multilateral and bilateral DFIs including both best sovereign and non-sovereign portfolios. In the background, we also undertook specific deep dive research into specific areas including commercial confidentiality, attribution of impact and DFI's SBG reporting.

Out of all of this work, we were able to map current practices, get a good understanding of the core data fields that stakeholders value and understand what was likely feasible and what wasn't. From all of this, we have produced the DFI transparency tool.

And the purpose of the tool is two-fold. Firstly, to help definie themselves, review their disclosure practices against the fields laid out in the tool. Secondly, the tool will enable Publish What You Fund to undertake an assessment of DFI disclosure from which we can produce ranking and we plan to do this at the end of next year.

We will now get into a bit of detail about the tool. As you can see on the slide, the tool is made of four central components with an additional component that deals with financial intermediary sub-investments. The four central components are core information, impact management, ESG and accountability to communities and financial information.

Each of these components is separated into two sections, organizational information that include policies such as disclosure policies, annual reports and project level information that relates to individual investments. In total there are 11 organizational indicators and 32 project level indicators. We will get into the financial intermediary section in more detail in a moment. But note here, there are nine indicators that relate to financial intermediary sub-investments.

So in total, the tool is composed of 52 indicators that represent a comprehensive set of information that our researchers indicated are priorities for of DFI stakeholders. Many DFIs are already sharing a large proportion of these. That's not to say that the tool is not ambitious, but it is also being designed to be achievable.

Here's a screen shot of the impact section of the tool. You can see that for each field, we have a numbered indicator, a survey question which helps users understand what we're looking for, a definition and then some additional notes to guide disclosure. Where possible, we've tried to align the requirements of the tool with other approaches including the A transparency index and the international Aids transparency initiative.

DFI investments in financial intermediaries are growing and increasingly represent a major aspect of the work that they do. For DFIs such as IFC and DFC, this type of investing now makes up over half of all their non-sovereign lending. Lending to financial intermediaries allow DFIs to reach a breath of people that direct investments cannot achieve. This includes introducing banking services for the unbanks, extending housing finance markets and supporting the SME sector that is typically too small to benefit from direct DFI investments.

However, we know that FI investments can be controversial. There are numerous examples of such investments being tied to activities that have caused both environmental and social harms. That all deals with the transparency of financial intermediary lending at two levels. At the level of the financial intermediary itself, we stipulated disclosure should be in line with direct investments including reporting of impact data, ESG information and finance details.

Additionally, we use a filter to identify the types of sub-investments that should be disclosed. And this filter based on the risk categorization and size of sub-investments is designed to identify activities that pose the greatest risk. For these investments, we identify nine data points that should be disclosed and it is important to note that current disclosure practices around five intermediaries are extremely limited. We current know too little about the uses of development finance once it has been reached finance intermediaries and the tool is designed to improve this situation.

And so, for next steps. Following our launch, we will begin to develop a methodology that allows us to measure and monitor the transparency of DFIs. As with our work to date, this will be a collaborative process that will be open to a range of stakeholders for consultation. Following this, we will begin data collection and analysis. Again, engaging and working constructively with DFIs.

Finally, we aim to release a pilot assessment of DFI transparency as measured against the DFI transparency tool towards the end of next year.

Before I hand back to George for the panel discussion, I just would like to say a huge thank you to everyone who has helped us throughout this initiative. This includes the CSOs who have been working on these issues for years and have been exceedingly generous with their time and it also includes the DFIs who have engaged with us. Who have sat through our expert working groups sometimes finding experts throughout their organizations to ensure we get the breadth of input we need?

We know that what we're asking for here is ambitious. We don't expect DFIs to be able to meet all of these requirements within the first year. But we know from the conversations that we’ve had with DFIs that change is possible and that the expectations enshrined in the transparency tools are feasible.

And it’s clear we need change given the scale of investment we're talking about and the scale of needs we're seeking to address. We need more than just a few leaders to drive that change. We need a wholesale shift around impact, ESG, accountability and market building. And that shift starts with a shift in transparency. Now, over to George for the panel discussion.

MR. INGRAM: Gary, I thank you and Rob for setting up the conversation today very well.

We'll now move to the panel discussion. I will introduce the panel members as I ask each of them the first question.

I will note that audience participation has been through posing questions through the registration process and we have built some of those questions into the panel conversation.

I'd like to start with you first, Nadia Daar. Welcome. You are head of Oxfam's D.C. office and have been involved in development finance for some years. Tell us briefly about Oxfam's engagement in development finance.

MS. DAAR: Thanks, George. And lovely to be here. Firstly, let me say a huge congratulations for the Publish What You Fund team for this really truly collaborative and important effort.

For us at Oxfam, it's really relevant. We take a special interest in DFIs given the extremely influential role and cascading effect that they can play in setting the standard for the private sector and development. So we look at the IFCs and the performance standards, for example. We look at things from a do no harm approach working on environmental and social safeguards and then also promoting the kinds of investments that we want to see and what kinds of investments we don't think are appropriate, for example. And, you know, in the fossil fuel industry.

But we're also working on inventing accountability at these institutions and supporting communities to access that accountability and recess where we can. And we have a particular interest in the financial and intermediary's portfolio of DFIs for reasons already mentioned and ones that we'll get into more later. But, yes. So as mentioned, this is highly relevant for us.

MR. INGRAM: So Oxfam has looked at development finance for a number of years and quite deeply. You mentioned accountability. Give us a broader view of why disclosure of information is so important and relevant to civil society.

MS. DAAR: Thanks. So I mean it's this disclosure of information in these public institutions. And I think that's the first starting point for us is recalling that we're talking about public money, public financial institutions that are using tax dollars with a development mandate at stake.

And so, we expect transparency from those institutions funding the public sector and the argument should be no different for those funding the private sector. In fact, one could even argue that there are even more reasons for transparency in the private sector operations given the profit driven incentive associated with this sector and the risk that that could surpass the public good element.

So we transparency and access to information being really at the core of good governance and informed and inclusive participation and decision making and accountability. And it really cuts right through and across the entire cycle of good development. So starting at the design of a project, you know, ensuring that transparency can help maximize the good outcomes and minimize and mitigate the risks. You know, you need this timely information for better decision making that's really well established and poor disclosure can negatively impact the quality of community engagement and participation.

But secondly, disclosure is important for making the appropriate case for an investment to shareholders. I mean, you were saying, you know, shareholders should care about this. And truly, they should for understanding what impact these investments can have. And then also looking at the financial end on financial risk.

But just going back to this issue of accountability. For us, there are many forms of aggregate disclosure in development finance, but where we find is really important to emphasize is the form of disclosure that can bridge the gap between project effective communities on the one hand and DFIs making these investments on the other. And without that disclosure, the project impact and the risk can become divorce from the systems that we've all worked so hard to promote over the years.

So thinking about environmental and social safeguards, for example. When there is that break in disclosure and lack of information, you know, the policies are not as appropriately implemented. Communities don't know what their rights. They don't know that there is access to redress from these institutions. And it's particularly the case for vulnerable and marginalized communities where that transparency is -- and the need for disclosure, it's real and it's urgent.

And we've seen the value of transparency with the multitude of cases that you've seen come to the accountability mechanisms. For example, at these institutions where there have been severe adverse impacts related to human rights and so forth. But you also see it in the cases where there hasn't been transparency. For example, in the finance intermediary lending where there has been this big disconnect and where that transparency has meant that environmental and social policies have not been well implemented and there's been massive repercussions there.

So just to close with -- to say that I do think the financial intermediary sector is one of the most important ones that we need to be looking at. You know, it makes up around 60 percent of the ISC's portfolio at this point, over 40 percent at FMO, over 30 percent of the EIB. This is a huge blackhole and sort of gap in development finance accountability and transparency. I'm sure we'll get into it later.

MR. INGRAM: Thank you, Nadia. I would now like to turn to Tom. Tom Edmondson-Low. Welcome, Tom. And briefly describe to us the EBRD, the European Bank for Reconstruction and Development and what its main mission is.

MR. EDMONDSON-LOW: Hi, George. Thanks very much. So my name is Tom Edmondson-Low as you say and I'm a Director in the office of the Secretary General here at the EBRD and transparency is one of the four key pillars of governance. And we look after the corporate governance of the EBRD, hence, transparency falls into our arena.

So the EBRD is one DFIs that we're talking about. And the team here has worked very closely with Gary and the team in terms of developing this very interesting tool that is being launched today. But the EBRD started out as the bank that was there to support a transition from communist countries, to help the communist countries transition from centrally managed economies to market economies.

And that mission, obviously, started a long time ago. But some of the tools that we use in order to deliver that, notably the private sector investments have proven useful in other areas notably after the financial crisis, during the Arab spring and even the most recent crisis of COVID. A lot of the products that we provide to our clients have proven very useful.

And looking ahead, the green agenda, the climate agenda is going to be ever more important there. Sustainable development is baked into the DNA of the (inaudible) anyway. But I think that's going to get even more, and it's not even the U.S.A. Transparency is absolutely the key on making sure that we can all deliver.

MR. INGRAM: Right. And so, give us a little bit more on why transparency is important to the EBRD today. What are some of the steps you have taken towards transparency? Maybe what are the results?

MR. EDMONDSON-LOW: Sure. So in terms of why they are important. As I was saying, in terms of -- for the EBRD to support the transition from centrally managed economy to market economy, we need to build up the markets through the private sector.

Now, what's key to a functioning market is trust amongst the investors. And to build trust investments, you need to have appropriate transparency, which is why many stock exchanges, if you're going to list yourself on the stock exchange you need to sign up to various transparency rules to ensure that the investors can see what's going on inside your company and to see whether or not they want to part with their hard-earned cash.

So in that sense, it is really important that transparency that can happen. And as, I think Nadia and Robert were saying. It's important that they lead by example on that front. I think I moved in some way to answering your last question.

I think on your second question, what have we done? So we ran a big review in 2018, 2019 of a new access to information policy that significantly turned the dial in terms of what EBRD would disclose. That's being rolled out since January 2020. So we're nearly halfway through. We've got another review coming up at the end of next year.

And I'd say that some of the key successes that we've had, some of the results that we've had from that is increased disclosure of project summary documents. So that's before the project gets to the board. We're able to disclose to everybody on the internet what we're going to be investing.

We regularly submit any state sector project documents that do go to the board so that's going full transparency on state sector documents. And I think interestingly given the progress of the transparency tool that this meeting is about launching is the impact information in relation to those of projects which is subject to self-evaluation. So that feeds directly into that.

MR. INGRAM: All right. Well, Tom, thank you very much for making the connection between transparency and trust. I did not mention that in my opening remarks, but I've always felt that was one of the important roles of transparency. Thank you.

Let's move onto Elizabeth, Elizabeth Boggs Davidsen. First of all, Elizabeth congratulations on your new post as Vice President of the Office of Development Policy at the DFC. Give us a sense of your role and your responsibilities there. DFC being the Development Finance Corporation which is a successor to OPIC.

MS. BOGGS DAVIDSEN: Thank you, George. Happy to do that. So as VP of the Office of Development Policy, I've been charged really of, you know, safeguarding social and environmental risk. We have the office consists of teams, environment specialists, social specialists. We have economists. We have impact management specialists, and we have a new team that's managing our technical assistance.

So we safeguard the social and environmental risk. We try and confirm that all projects do not have a negative impact on the U.S. economy or the U.S. employment. We work to ensure that all the projects maximize positive development outcomes and as I mentioned, we're managing grants now to really develop and improve DFC's projects and hopefully their impact. So that's the ODP in a nutshell.

MR. INGRAM: Good. Well, thanks to Rob and others, the Build Act establishes a very strong development mandate for the DFC, even stronger than OPIC had.

And its establishment was accompanied by a commitment that it would set the standard for transparency, the gold standard for transparency. What steps has the DFC taken to go beyond what OPIC did to be more transparent in its activities?

MS. BOGGS DAVIDSEN: Right. So this, you know, very progressive legislation really directed us to develop standards, to develop a method for ensuring, you know, how we have appropriate development performance of the agency's portfolio including the development of a performance management system that would evaluate and monitor projects in the portfolio. And, you know, to help fulfill this mandate, the agency has taken several steps to ensure its governance structure, it has reinforced its project selection processes. It has really worked and doubled down on the impact management approach to drive that development and transparency mandate.

So, you know, right off the bat, the agency has achieved development office and the officer reports to the board of directors and also created as part of governance a development advisory council to provide further guidance on impact strategy. There's an office of accountability that was established to really address those concerns or conflicts or complaints on environmental or social issues raised by project effected communities or sponsors or project workers.

The agency has become much more intentional and strategic in its approach to project selection. Really all with that intention of enhancing development impact from the process of refining our development strategy. Call the (inaudible) for impact that really reflects this administration's focus on climate, inclusive growth. And now, I'm happy to say really aligns with the sustainable development goals.

And on the project level, we're in the process of implementing the new impact management tool. What we call the impact quotient or IQ. The transparent process, quite frankly, that DFC developed the IQ, you know, I think early on demonstrated the agency's commitment to transparency. The tool was developed in collaboration with over 50 stakeholders, many of you included. There were impact investors or MGOs, there were think tanks, other DFIs, academia, U.S. government agencies. And the agency also solicited the input, you know, a public comment period.

So I think DFC benefited significantly from this process, and it's really a hallmark for our IQ system. And we did successfully undergo a third-party verification of our impact management practices in August. And, in fact, you we confirmed that this is really a best-in-class tool.

So we're, you know, now taking steps to enhance, you know, both our data and government's processes and trying to improve our technological capacity to publish more of the data that we're finding now starting to collect that is of much higher quality and in a format that is going to be much more accessible to our stakeholders.

MR. INGRAM: Great. Thank you. I'm sure that many in our audience are very much engaged in the sustainable development goals. And I would call to their attention the blog you put out a month or so ago connecting the work of the DFC to the SDGs. That was very refreshing to see that.

Okay. Let's move to Rayyan, Rayyan Hassan. Thanks for being with us today, Rayyan. And tell us about the role of the NGO Forum. What is the focus of its work?

MR. HASSAN: Thank you, George, for the opportunity to speak and a big congratulations to Publish What You Fund. We as a grassroot civil society network always appreciate the focus around information disclosure on DFIs being brought to a public domain so I'm really happy to be here.

The NGO Forum on ADB is a civil society network of over 300 organizations mostly grassroot organizations and local CSOs. We're spread across 14 countries in Asia. Regionally in South Asia, Southeast Asia, the Mekong, Central Asia. So the focus is generally responding to large scale infrastructure projects mainly financed by the Asian Development Bank. And as of 2015, we started looking at the Asian infrastructure investment bank.

Our focus has been to ensure that community rights, environmental and social impacts, our issues surrounding these from communities are brought to surface to the decision makers of the bank and we seek accountability and good governance to mitigate those risks.

MR. INGRAM: All right. Thank you. I think I'm safe quoting you because the report quotes you. So it's a public quote. And you say if DFIs choose not to disclose, they choose not to be accountable, an issue that has already come up today.

What is the current state of disclosure particularly with respect to ESGs? That's environment, social and governance issues. And accountability to communities? What are the main areas that need improvement?

MR. HASSAN: Well, that's an excellent question. And now, you've put me on the spot with my own words.

So information, we feel is the bloodline of accountability when it comes to large scale infrastructure. And truth be told, when we're looking at like infrastructure projects in the region, in Asia, you've got different borrower governments at different levels of maturity. Some are lower middle-income countries. Some are trying to leapfrog into the middle-income countries.

So the importance of the infrastructure project to the borrowing government is essential for a successful project to happen. Now, local communities were at the front of the construction of a project are not necessarily getting the benefits as they should be if information disclosure was done due diligently prior to construction and prior to project approval. I think the most principle issue here that we have noticed, at least from the regional development acts that we see that sovereign borrowers tended to have better information disclosure than non- sovereign borrowers.

I think mainly because the success of the project has a long-term development, national development agenda. Therefore, disclosure -- even political will at the same time the sovereign nation who is borrowing from, say, the ADB. A 50-year-old bank wants to maintain those relationships. So that's first off the bat between sovereign and non-sovereign disclosure. And as Nadia Daar from Oxfam mentioned in our region FI projects are riddled with issues in terms of disclosure. There has not been enough disclosure from the banks that we notice.

But at the end of the day what you really want to see is that environmental and social risks are made meaningfully clear to local communities prior to the bulldozer coming up to their homes. And if a sincere effort is made, and we've seen successful projects, that generally entails bank officials and borrowers getting boots on the ground and making sure that the people understand the risk.

It's an uphill battle and I think it has rules for both local civil society, borrowers, private sector operators, the government as well as the DFIs themselves to make sure that a project is successful. So we're just a part of that process.

MR. INGRAM: Okay. Thank you very much. And now, I'd like to move onto Nadia Nikolova. Nadia, you're at the Allianz. Tell us about the Allianz and your role there.

MS. NIKOLOVA: Sure. First of all, thank you for having me today and really congratulations for the phenomenal work that has been done over the last few years. It's been a pleasure working with all of you.

My name is Nadia Nikolova. I'm the Lead Portfolio Manager for our development finance strategy here at the Allianz global investors. We are essentially an asset manager. We manage over 600 billion Euros assets and their management and we have traditional asset classes, equities and fixed income as well as alternative asset classes where the development finance team that I had fits in.

And what we try to do within the team is essentially breach the barriers that exist today for private capital immobilization in emerging markets for sustainable development. And I'm happy to get into some of the details of what that entails.

MR. INGRAM: Right. So let's get into some of those details. In discussions about the SDGs and closing the finance gap, there's an expectation that the private sector will play an essential role in achieving and attaining the global goals. What is the role of the private sector? And what do they need to be successful?

MS. NIKOLOVA: So all the different estimates of the SDG per atom gap that I see are somewhere between 2.5 to 4.2 trillion depending if you're pre-COVID or post-COVID.

The higher number is basically the size of France's GDP. We're talking about a huge amounts of capital that need to flow. In the European insurance sector alone is 8.7 trillion of assets that need to be invested because where yields are -- and particularly in Europe at the moment alternatives to traditional asset classes need to be found. So investors are also looking for diversification.

So I think the positive news is that they're increasing incentive for institutional investors to becoming into more of emerging or developing market depending on who you talk to different terms and views. Their yields are relatively low in Europe so because are looking for diversification, looking for higher yields.

But there is also is a huge system ability agenda. I think all of our phones are popping with COP26 announcements every 30 seconds. And a lot of those are coming from the private sectors. IDMs is part of the -- he’s a founding member of the U.N. Net Zero asset owner lines. So are we on the asset management side.

The role that the private sector is going to play is fundamentally plugging a lot of that gap. The negative news is that a lot of that capital at the moment is absolutely terrified entering development financing in emerging markets. And a lot of the reasons why that is the case is because there isn’t enough disclosure as to know whether there is a real gap between perceived risk and actual risk or the actual risks are what they are perceived to be.

So I think data is going to be absolutely critical and transparency in a way that it is consistent across development finance institutions would be -- I think that would be paramount. And I think the project that we have here is ambitious. I think we need more urgency to it.

MR. INGRAM: I think you’ve laid out an agenda for another event down the road. I’d like to go to a second round of questions for the panelists.

And I want to start out on the topic of impact. And start out with Elizabeth, Tom and Nadia Daar in that order. Some DFIs have put significant research and consultation in constructing impact measurement tools systems. The DFC has its impact quotient. The IFC has aim. EBRD has ETI. Making information on impact DFI investment, which seem important both to be able to assess the use of public funds and to build public understanding and trust.

What do you see as the value of information on development impact? And how in depth should be public reporting be? Elizabeth?

MS. BOGGS DAVIDSEN: Right. So as I mentioned briefly and you just mentioned, George. We do have this new IQ and it's our impact management system. And it really helps to provide a standardized systemic way to assess a project's projected and actual development impact throughout that investment lifecycle.

And, you know, this was about thoughtful process. We're using standard indicators. We're looking at economic growth. We're looking at inclusion and innovation. These themes were very prevalent in our founding legislation. And the scores classify every potential project as either highly developmental, developmental or indeterminant. And, you know, just kind of a bit granular for metrics and the economic growth pillar, the scores are really based on the scale of impact. The larger the scale, the higher the score.

And for metrics and inclusion, the scores are based on the percentage of beneficiaries that are from historically disadvantaged populations or geographies. And again, the higher the percentage, the higher the score.

Innovation IQ scores are distinguished by sector wide and firm level impacts and includes metrics to measure market and energy diversification or innovative financial structures or maybe transfer of knowledge and technologies. So the scores are designed to reflect the relevance of impacts by taking into account the level of development of the sector and/or that socioeconomic inequality in those country.

And I think the final risk adjusted score based on this multidimensional impact really provides our management with a comprehensive picture of a project's potential for significant development impact across a range of sectors and geographies. And, you know, really throughout the approval process we get sort of the baseline that allows us to then hopefully monitor the development performance during the life of the project.

And, you know, we're trying to be intentional about making this available. We're a little handicapped, I would suggest with some of our systems, but a detailed description of the DFC's IQ framework including scoring methodologies, indicators, the metrics as found on a dedicated IQ page on our website. And over time, we will be publishing more information on lessons learned from the use of this tool.

We're also providing some information on the IQ assessment on a project basis so there's a summary of each of the project's development objectives and IQ scoring classification again on the website and the project public summary.

So this is very much a work in progress, but certainly the intention is to really show off this new tool that we have in system for measuring, managing and reporting. And hopefully soon disclosing on our impact.

MR. INGRAM: Great. Thank you. Tom?

MR. EDMONDSON-LOW: Yes. Thanks, George. A very good question. So as you mentioned has ETI that's now become a development tool.

So ETI stands for expected transition impact. And as I was saying earlier. As a bank that is here to deliver transition from centralized economies to market economies. That then to be able to measure that transition impact is clearly key. So for us, we disclose the ETI scores for each project in the project summary document that I was mentioning earlier that we publish on the website already.

So in that sense, we have a fairly good place in terms of disclosure. Now, but your comment about what's the value of that development impact disclosure is I think a good one. As Nadia was saying earlier, Nadia Daar, you were saying earlier. DFIs are setup with public money. And so, there's an accountability there that we have primarily to our shareholders who are, of course, governments who in turn are mostly elected by the public.

But also, the public pound or dollar or ruble itself. So to be able to publish those ETI scores means that we should hopefully build the confidence of the wider stakeholder base and eventually their trust. I mean clearly (inaudible) who pay closest attention to those ETI scores to make sure that as a bank we are delivering on that development mandate, but clearly there is a wider stakeholder base with the interest in it.

MR. INGRAM: Tom, a quick follow up. You said that the EBRD publishes the expected impact score of an investment. And I gather that is unusual for a DFI. And do you get much pushback or concern from your investees on that issue?

MR. EDMONDSON-LOW: So not being client basing, I'm not sure. I would assume that we will get some from some people who are not used to that kind of disclosure. And this goes to almost half of the transition kind of approach. If not, if anything, we want to help our clients develop themselves into better clients.

I think Rayyan, you mentioned this in your intro. You know, if we're building a road and you want to be able to ensure not only is the project being disclosed in an appropriate way, but even when we, the EBRD, aren't involved with the people that build that road can do it again. So they will build a second road and they'll do the same thing. So that's kind of the transition that impacts that we have in terms of disclosure.

So I think it will be a mixed reaction, George. Some people who worked with us before or worked with an advisor, who may be a more advanced with the companies will be fine with it. And some people who may never come across this before are going to be like, what? What is this? What does all this come down to?

MR. INGRAM: Right. Thank you. Nadia Daar?

MS. DAAR: Thanks, George. So I mean again starting with the, you know, what is the mandate of these institutions? They have a development mandate. They're not regular banks doling out money any which way. They have a responsibility and an imperative to use those public resources wisely and for the public good.

And I think measuring and ensuring positive impacts of private sector investments is really important to this. And having the system in place to help DFIs make investment decisions and help stakeholders and shareholders understand these decisions is really important to going back to that theme of the day I feel building more trust and accountability.

And what we've seen is that operating in the private sector there is this major risk that investments end up getting driven by the need or ease at which it is easier to do this rather than thinking about bigger picture development impact. The ease of making a deal rather than development impact as a driving force behind these investment decisions.

And there is that high risk also of taking too far step aback and thinking, well, you know, any activity that is adding or contributing to the GDP of this country. It's adding jobs somehow. That's, quote, unquote, development and benefits will eventually trickle down. We know that that's not how you achieve deliberate and sustainable poverty reduction. It's not how you achieve inequality reduction. And it is not a good use of public resources.

But the risk of taking that approach is real. And it's especially real when DFIs are balancing the need for financial sustainability given that they are expected to be largely self-sustaining so they need to make financial returns on these investments for the large part as well. They can afford to take some financial risk, but, you know, not every risk, every which way. So important to say that development impacts are not simply about economic growth.

It's about a fundamental contribution to poverty and inequality progress on the SDGs, fulfilling rights, looking at not just jobs but, you know, quality jobs that provide decent work and a living wage. Environmental sustainability. So it also includes this do not harm agenda as well. So for example, when measuring, you know, expected impact at what stage are the risks too high that they override the possible positive impact?

So the assessment is really important and transparency and disclosure on how projects are scored and evaluated is really critical. We need disclosure on the methodology and it was great to hear Elizabeth talk about the fact that the DFC is doing that. We need to understand the breakdown of these ratings and the performance on the various indicators. You know, how are the indicators weighed.

It's crucial for stakeholders to help them better understand what's happening on the ground. And also, how they're being evaluated. And then also then provider reality check if that assessment isn't consistent with what happens on the ground. So it's the fancy piece, but it's also the expost disclosure of impact that I think is also important to talk about.

And, you know, we talked about IQ and aim and the EBRD system but that's not really the expost. And that's a big part that is sorely missing at this point for learning purposes but also to see how projects have actually manifested in terms of impact negative or positive. And then check that against the score that they were expected to have and be able to have learnings and, you know, it's an iterative process with these impact assessments.

MR. INGRAM: Thank you for raising that issue of expost evaluations and assessment that's very important.

I'd like to move to the issue, a topic of commercial confidentiality with Nada Nikolova and you, Nadar Daar. And I'll start with Nada Nikolova.

And one of our participants, one of our audience, Martin Borris (phonetic) of Engineers Without Border, Canada, raised when he registered the issue of better data for the private sector. Report finds that a few institutions are making public information that is typically treated as commercially confidential.

Where are the boundaries that separate data that is of public interest from data which is actually sensitive for commercial purposes? And what is the interest from both the private sector and civil society in having access to that information? Nada Nikolova, if you would start, please?

MS. NIKOLOVA: Sure. I think I'm in an interesting position because I've been on both sides so the lender, but I also have the advised investors into my funds. So I have been subject to disclosure and I have required disclosure on both sides.

So let me give you both perspectives. If I take -- there is a question about what data gets disclosed, but also, I think the more relevant question is the timing when that data is being disclosed.

As a lender, I completely understand that some commercial information should not be disclosed before federal close because that might prejudice the closing of that financial project. Nonetheless, what we know from public capital markets is that borrowers generally tend to be okay with that data being available online. If you think about number, every single (inaudible) out there. You have the pricing information. You have the evaluation information. You have the financial statements of the borrowers and so on and so forth. And that happens in a world where we have plenty of capital in developed markets.

In a world where we are capital constraint so the borrowers are lacking alternatives of capital in development banks tend to be the holy grail in terms of availability of capital. The negotiating power is even higher. So I think that idea of that borrowers are going to be incredibly resistant of certain information being published, I think it's a matter of when that information is public not generically about being disclosed in the first place.

And I think the bigger issue here is one of culture and one with an investment officers. It's a change in the way we negotiate with borrowers. It's a change in the way we do things. It's changing the system and mentality within the development bank. And if that message doesn't come top down, very strongly and very loudly, I am afraid it will be more challenging and it will take more time.

And I keep on going to that point of urgency. It's the end of 2021. I have been talking about the GEM database being disclosed for at least six years by now. And we are only having a portion

-- a very small portion of it disclosed. So I think it's about timing when the data is being disclosed, not about the general principle of that data being disclosed. Having been both the borrower and the lender in the place with DFIs.

MR. INGRAM: So much in life seems to come down to the culture and changing culture, doesn't it? Nadia Daar, your thoughts on this?

MS. DAAR: Thanks. And I would echo a lot of what my friend, Nadia, has already said.

So I mean the most common and possibly challenging argument for why DFIs cannot disclose has been this argument of commercial confidentiality on the private sector. And it has been used over and over. So it is really important to break it down and understand what is confidential and what can be overcome.

And we acknowledge that there are some forms of confidentiality maybe that do need to remain, but the fact is that we found in most countries -- let's look at the financial sector. In most countries with bank secrecy laws, they have a specific set of exceptions for which banks can overcome client confidentiality and one of the most common and clear exceptions is if you can achieve client consent.

So it really is the thing that Nadia was talking about, about this, you know, discussion between the lender and the borrower and having that agreement at that point. And so, when DFIs and their financial intermediary clients like commercial banks say they cannot disclose certain information. We know that's not the whole story because we've seen enough examples provided by a number of DFIs themselves who are disclosing -- themselves they are disclosing this financial relationship with their direct clients.

So we know that that element has been allowed. So we know it can be overcome and we see this with project information. We see it with ESG information. But to your question of where the boundaries that separate information that is of public interest from information that could actually be sensitive from a commercial perspective. This argument of client confidentiality and perceived competitive disadvantage really it ignores the fact that many banks, as I say, are already disclosing new client relationships. Information about deals and client's identity, project details, the deal size.

And we're seeing this in databases as Nadia mentioned. You know, the Thompson

Reuter's database, the Bloomberg database on a regular basis. And we ourselves as Oxfam and many of our partners have used these databases and paid thousands of dollars for them to work backwards from risky project to understand how they are connected to DFIs in seeking accountability and redress for communities.

And we found numerous egregious cases where ESG standards were not being applied because there is this break in disclosure and accountability. So this info is there. Why is it there? Banks are doing this in order to market themselves. And the scale of loans that they deliver. And like I said the information is available to anyone who can pay for this database subscription.

But that is not the communities who need that information. Those communities cannot afford to pay for those databases. And we know that it can be as simple as signing those consent forms. It's at that time of the deal making that the client can sign the consent form and that's how that information is getting into those databases.

So they're signing it for one purpose. They can sign it for another purpose. That purpose being accountable development sign out. So I mean, unfortunately, as it currently stands and as show by the Publish What You Fund report that's being released today. The lack of disclosure as such information by DFIs and their FI plans is really a choice at this point rather than a legal roadblock as many would claim.

So it's really important to keep pushing those boundaries. It is urgent as Nadia said. And we can't allow that excuse of confidentiality which is sometimes, but not always warranted to prevent disclosure.

MR. INGRAM: Thank you, Nadia. So let me continue this conversation and back to Nadia Nikolova. And focus in on the financial terms of a deal.

And you said that the private sector needs information. They need data. What kind of data do they need? And what would they do with it? Why do they need it?

MS. LAJEVARDI: Sure. I tend to use the acronym IRR in a different context and I plagiarize that from FMO so excuse me. And that is impact, risk and return are the three terms of that investors are looking for.

Nadia, mentioned -- Nadia Daar mentioned previously the one thing is having an impact score completely different saying has this impact that should have been achieved. Are we saying that we're having a true impact model just because we are coinvesting alongside development finance institutions?

So I can't tell you in a world based out of Europe, we're subject to a tremendous amount of regulation at the moment around (inaudible), SFDR spendable disclosure information. So we are being asked to disclose as much impact data as possible out there in the public domain as investors. And we're not public institutions, right? We are private side investors that are ask to disclose that information.

One of the things that would be phenomenal is there was a consistency and standardization across all this impact models because it's wonderful to hear about them, but it's also really complex to get your head around from one development bank to the other. If there was a way to start creating common benchmarks around what impact threshold essentially are in certain sectors, certain jurisdictions then that is helping phenomenally with counting institutional investors.

Risk and return. What are the historic default ratings being on the portfolios of development of the banks? We have seen that through the James database. Unfortunately, they didn't show us anything on the recovery rates. If investors are trying to understand what historic losses have been as a proxy for what future losses may be, recovery rates are incredibly important. So at the moment we don't have the information to be able to say that perceived risk is different from actual risk. And so long as that is the case, investors would be resistant to be entering this market in a scalable way.

And then there is the return component, right? If you are able to measure risk then you're able to price it, and you need that information again. Whether that information needs to be on individual transaction on aggregated levels for sectors, per country so that investors can get an idea. Essentially, that track record is what brings investors into a realm where they are more comfortable to allocate larger portions of capital into emerging and frontier markets.

I'll give you just one example of the power of data. In 2012, there were very few institutional investors investing directly in large scale infrastructure projects. That is about 10 years ago. I'm talking about development markets here. The Moody's came up with this default data study where it has recovery rates and a historic default rate.

This document was used in order to crowd in large amounts of private capital. Today, infrastructure in development markets is an established product that almost every investor has in their location or they are going to increase their location. That is the power of data. We alone are managing 13 billion of infrastructure that ourselves as a single asset manager. That is the power of data. That is why I have been talking GEMs database impact data incredibly important.

MR. INGRAM: Thanks for that example. That really helps us understand the topic much better.

Elizabeth and Rayyan, I would like to talk about something that we know the least about. And that's financial intermediaries and their sub-investments. DFIs increasingly are turning development finance towards financial intermediaries such as banks. And these financial intermediaries are then on lending activities that we call sub-investments, but there's a dearth of information.

What is the role of financial intermediaries in development finance? And what information on their projects should be made available? First go to you, Elizabeth. If you could give us a couple of minutes on that. And then we'll go Ryyan.

MS. BOGGS DAVIDSEN: Right. Well, we all, you know, invest in financial intermediaries really to serve those hard-to reach companies that were unable to serve directly especially micro small, and medium sized enterprises.

And, you know, the locally based financial intermediaries have that local access and market knowledge to make smart and hopefully highly impactful investments. I was looking at this quickly yesterday. And about 45 percent of our portfolio is invested in financial institutions, which includes, you know, banks and non-bank financial institutions. The overwhelming majority is directed at serving micro small and medium enterprises.

And about a third of the portfolios actually invest in Latin America. And when I say the portfolio, DFC launched in 2020, but we absorbed OPIC's robust portfolio. And, you know, we're getting information on the value of the FI lending and the number of clients reached.

And this data seems to be readily provided to us by FIs, but, you know, we're more limited in our ability to collect data on MSMEs that are not already collected by the financial institutions. And so, not really effectively getting baseline or annual revenues or jobs that would indicate growth because the banks don't necessarily collect that information every year.

I will say that, you know, given the importance of this sector and I've been part of this transparency initiative for some time now. My department has just launched an initiative to really gain a deeper understanding of the impact of these investments. We're conducting a development impact performance assessment of our investments in financial intermediaries in Latin America. Not the entire portfolio but a significant number of FIs are being analyzed.

And that's an attempt to do kind of a deep dive to really look at impact results to date and some of the early learnings from some of our projects under the 2X women's impower initiative. So we do anticipate having some outcomes of this initiative by early February. So you can stay tune for a read out sometimes soon after February.

MR. INGRAM: Yeah, I'll be back to you to bug you to see what the findings are on those.

MS. BOGGS DAVIDSEN: Yeah. I mean we're all grappling with this and I have to say the tool is really interesting and helpful North Star for us. Just we know where our gaps are and it is helping us sort of to inform how we need to report and which one better.

MR. INGRAM: Good. Great. Rayyan?

MR. HASSAN: Yeah. I mean the issue of financial intermediaries, it's an interesting reality. I think even from civil society, we are accepting the fact that DFIs are going to learn through financial intermediary modalities. And we have to figure out a way to make sure that risk down on the ground on some project level are mitigated and people get to know what those projects are.

Now, why are financial intermediaries chosen over sovereign landing and non-sovereign private sector projects is because of the speed of the liquidity. And the ability for doing multiple small scale projects on a wider space in a quicker amount of time. Now, this makes perfect sense if you wanted to do rooftop solar evolutions across an urban development city. And sovereign lending would just take too long and an FI would make perfect sense to do it.

The tricky problems happen when you want to build a six-lane highway which is going through an ecologically pristine ecosystem and which might have massive environmental and social impacts. That's when FI's really struggle at the sub-project level to ensure environmental and social governance takes place.

One of the key issues here would be which FIs are chosen? Do they have an environmental, social management system in the first place? And I think that question around screening the FI early on is absolutely fundamental because at the end of the day the FIs do have a development agenda and when it comes to real infrastructure there has to be that responsible decision making of over who the FI client is.

One example, and I'll quickly finish. We made an information disclosure request for six FIs for a particular regional MDV which we were tracking. And from the six FIs, only one FI released their environmental and social information and all other five FIs decided their confidentiality clause that it was affecting business interests.

So then you see the arbitrary response around the DSMS information disclosure by different FIs. That means there is a conceptual disclarity over environmental and social release of information. What falls under risking business interests and why did that one particular FI release their documentation for us.

So this is a space which requires further debate for us choosing the right FI which has a robust experience ESMS system which can select responsible sub-project actors is absolutely fundamental, but the world is not perfect so here we are discussing these things. Back to you.

MR. INGRAM: All right. Thanks. That differential response to your inquiry is quite telling so thanks for giving us that. So one last round of a single question to all the panelists on the transparency tool that Gary described at the beginning of our event.

And I hope that Sara Saka (phonetic) is online listening because she asked in the registration process of how we get better information on reporting and sharing of data? And then another one, somebody who probably a lot of you all know made a comment and this came from Karen Fiddlestone (phonetic) at the IFC.

And she said, quote, she's been carefully following this effort and thanks to the research and work on the DFI initiative has been comprehensive and collaborative. Nice to hear. She says that the IFC has been a leader in transparency and that the tool is a way to achieve greater transparency consistently across all DFIs. And I will be eager to hear the thoughts of the panelists today. So hopefully, Karen is on listening to the panelists and their response.

Give us one minute on your assessment of this draft transparency tool and let me start with you, Ryyan, if you're still on the screen with me. So hopefully, you can start this off.

MR. HASSAN: Well, I think that at the end of the day for us representing local communities, it's about proximity. It's about proximity between the information and the local community and how to bridge that gap.

So this tool and the sectors that it covers for all forms of lending sovereign, non-sovereign FIs. It's ambitious but for us, we will probably require more if you want real risk to be mitigated. Once the bulldozer has come in and people have been resettled unwillingly. To solve that problem, is way more complex than to do it prior to the bulldozer, right?

So the tool is effective in keeping the DFIs pushing forward towards further disclosure and I think more initiatives like this and deepening engagements like Publish What You Fund has done is taking the direction and, you know, is taking the entire discussion in the right space. Civil society is here, EBRD and other DFIs are here.

So I think, yeah, the spirit of what we're trying to achieve is right, but there is a lot of work to be done.

MR. INGRAM: Okay. Nadia Nikolova?

MS. NIKOLOVA: I am a great fan of the initiative as you probably have seen through my participation in the last two years. I think the fact that we are having this conversation on its own is very positive with the stakeholders that we have had in the last two years working on the initiative.

Of course, I am with Rayyan on more can be done, but this is a good first step to engage with private sector investors and by that I mean institutional investors to educate as a first step what are actually development institutions investing in? And that is a first step before we can crowd them in.

That's why I keep on going back to the urgency because it takes some time to educate before we can really see the large scales of capital that we want to see when we're talking about trillions of capital ground for the SDGs really start flooding in. And again, it's 2022 around the corner.

MR. INGRAM: You keep saying that. Eventually, we're going to listen to you. Nadia Daar?

MS. DAAR: Thanks. I mean from our standpoint, you know, a summary of the points I've been trying to make is it's impossible for DFIs to make development impact claims or to make sustainability and human rights and environmental commitments but then fail to provide the information necessary to assess and monitor those commitments and hold the DFIs accountable.

And while there’s been significant movement over the years on the DFI side -- on transparency, on the DFI side it’s been patchy progress. And yes, the IFC has been a leader. And for example, you know, has made a lot of progress on FIs. Sub-progress disclosure commitments, but even those have yet to be properly implemented and there is still many, many, many gaps across the sector.

So this new transparency tool for us offers an evidence-based and quite comprehensive tool to help DFIs take those necessary steps to improve their transparency and move in the right direction. And hopefully, it will create a race to the top of transparency and accountability.

MR. INGRAM: Tom?

MR. EDMONDSON-LOW: Yeah, thanks. I think I’d say three things really on the tool. First of all, I think, George, you’ve created the fact that it is collaborative. I think that is definitely something that we would call out. And I think that’s going to be the foundation of its success really.

The second thing is its doable. And I think that’s really important because for us, I mean as I was saying earlier. We're looking at a review coming up in -- well, we're going to start fairly shortly really in the great schemes of things. But in 2024, we're going to be doing a review. And this is going to form a key plank in that review. It’s doing some of the landscape review that we would need to have done anyway.

The key point here, and this is the third point, I’d made. Is that because it is not just the DFI and in this case as are the EBRD doing it. It’s a collaborative enterprise with us and with lots of other people as well. It’s going to give people confidence that we're actually going in the right direction because we do need to, as Nadia -- and I keep correcting you and I'm sorry -- that we do push the boundaries because the biggest challenge that we face here really is culture change.

You know, even if the information is available, if the culture isn’t there then willing to disclose what needs to be disclosed, we're always going to face an uphill battle. So this is a great tool and we're very excited to have been part of the journey up until now. It’s fantastic that it is now launching and we look forward to continuing the great work.

MR. INGRAM: So, Elizabeth, you get to put a wrap on the panel discussion.

MS. BOGGS DAVIDSEN: You've no surprise assembly a coalition of the willing, I would say. But, you know, before I joined the DSC, the agency was actively engaging with Gary and the team in the development of this tool and it was because, you know, we wanted to better understand gaps and what DFC discloses compared to other DFIs. And I can say with some authority that we're quite committed to trying to fill gaps and this tool really provides that, albeit, North Star because we have work to do.

But we're starting. We're starting with some of the lower hanging fruits and moving forward. And we are really grateful for the work that's been done for this initiative. I think it will genuinely help the DFC focus its efforts on collecting and publishing data that really is valuable to stakeholders and, you know, I'm learning a lot in this new role. But the more transparent we are the more trust as George said we do in gender with our authorizers as well as with other stakeholders.

So we're pleased to use this as a guide and thank you very much for the opportunity today.

MR. INGRAM: Thanks, Elizabeth. So let me bring this event to a closure with a few observations of what I heard today.

One is that transparency is fundamental. It's fundamental to DFI's mandates. And if we want to better understand impact, we want to build markets. If we want to make sure we're accountable to an affected populations then transparency has to be there.

Second, one thing everyone agrees with is that we're not where we need to be on transparency of development finance. If some leaders out there, but even they have some ways to go.

Thirdly, we're also hearing that traditional arguments around commercial confidentiality have to be challenged. Some DFIs have found ways to overcome some hurdles even some of the most sensitive data.

And finally, the DFI transparency tool provides a practical and useful step in the right direction. If used properly it will help to standardize development finance disclosure and provide timely, comparable data about the impact. It strikes a balance between being ambitious and achievable and I think Tom said that. Tom said it is achievable.

We know many DFIs will be challenged to produce all this information for the first time around. We also know that a number of DFIs are already disclosing some of this information and seem to be eager to use it, to use the tool. Some have already started using it and we'll be interested and we'll be following what those results are.

I have a number of thanks to make as I conclude. First, to Rob for not only setting up the conversation today, but being such a champion for the development aspect of DFIs and for the role he played in constructing and getting through the Congress, the Build Act.

Gary and your colleagues at Publish What You Fund, I think when listen to Rob's initial comments that he was kind of dubious of this effort. When you heard Tom and others say this has been collaborative, I think you all can feel pretty good that you have achieved your goal of trying to do some objective research in a collaborative way that brings everybody together.

And I thank you and your colleagues for helping me put together this program today for helping to recruit the panelists, identifying the conversation and for the panelists, Elizabeth, Rayyan, Tom, both Nadias, this has been a rich conversation. We appreciate your taking the time to be here. I thank the audience for being with us and for the questions that were submitted in the registration. And I wish you all a good day.

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I, Carleton J. Anderson, III do hereby certify that the forgoing electronic file when originally transmitted was reduced to text at my direction; that said transcript is a true record of the proceedings therein referenced; that I am neither counsel for, related to, nor employed by any of the parties to the action in which these proceedings were taken; and, furthermore, that I am neither a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

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