



Public Consultation on IMF Board Papers
Revised Code of Fiscal Transparency
Report – Online Comments
Period: July 1 – August 30, 2013
Comments received: 13

Name	Organization	Country
Vasily B. Zatsepin	Gaidar Institute for Economic Policy	Russia

COMMENT # 1

Dear colleagues,

About draft as published: IMHO in Table B on page 7 line 1.4.4 “Reliability of Financial Statements” the order of cells’ content is reversed and contradict to common sense.

Fiscal transparency indicators list for fiscal reporting look incomplete and misleading at least in case of secrecy in state finances.

For example, line 1.a in Table C “Coverage of institutions” is measured by “Percent of public sector revenues and expenditures included in consolidated fiscal reports by subsector”.

Does it mean the same as “Share of expenditure on secret items” used in Open Budget Survey? IMHO it should be formulated in some more straight manner or secret share should be just added as particular indicator.

I’m attaching a [world map](#) that is quite eloquent on the matter. And on national level the picture is quite reach, at least in case of my country.

Name	Organization	Country
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Feedback from Public Sector

COMMENT # 2

Not cleared for posting

Name	Organization	Country
Ravi Duggal	International Budget Partnership	India

COMMENT # 3

Broadly the new draft code is a substantial improvement on the earlier versions and its structure is fine. Some specific comments below

1.1.2. Coverage of Institutions: Fiscal reports cover all entities engaged in public activity [R1] according to international standards.

2.1. Comprehensiveness[R2] : Fiscal forecasts and budgets should provide a comprehensive overview of fiscal prospects.

3.3. Fiscal Coordination: Fiscal relations across the public sector [R3] should be analyzed, disclosed, and coordinated.

[R1]They should include private institutions where substantial public investments have been made by public sector

[R2]The finances , revenues and expenditures of all levels of government should be made available in a single document to provide a complete and comprehensive picture. In large federal governance structures the subnational governments oft account for more than half of the fiscal story

[R3]This should include all public private partnerships and other off-budget expenditures

Name	Organization	Country
Chnara Mamatova	USAID-UNDP Support to National Budget Transparency Project	Kyrgyz Republic

COMMENT # 4

Dear Colleagues,

In my humble opinion, the Transparency Code as it is now provide quit clear rules for public finance transparency.

The question will be mainly on future application of these

Most of the pros on the code were already described by Jo Marie to which I also would like to add that the Code is really concentrated on idea of letting the society make judgment over the work of the Executive based on the budget info since it requires number of performance indicators.

I like this table with indicators. Though in the implementation it seems that the benchmarks of best practices could be used by the practitioners for promotion of transparency and reforms..

The requirement for a break down by impact groups (gender, vulnerable, demographic, regional) in the Citizens budget is also a very big plus.

The only thing which IS NOT CLEAR for me is point 2.5.1. Independent evaluation of Gov's fiscal forecasts. I understand the objective and reasoning for it, but when we say "independent" what exactly does it mean in the light of the Code.

Independent = from the Gov, i.e. local independent authority. Could the parliament's Budget Committee be independent, or the Central Bank assumed to be independent evaluator, or SAI or CSO

Independent = from the country's policies, international independent expertise

Apart from this "independent" all the rest seems to be well thought and comprehensive.

Thanks for your work and good luck.

Name	Organization	Country
SILWE Kaphalo Ségorbah M.	Centre for Research and Training on Integrated Development	Côte d'Ivoire

COMMENT # 5

Dear Sir or Madam,

Please find attached my comments on the Draft Code of Fiscal Transparency. [Original [French submission](#) attached; plus [English translation](#) by IMF]

Name	Organization	Country
Natalia Ablova	Bureau on Human Rights and the Rule of Law	Kyrgyz Republic

COMMENT # 6

Read [full comment](#)

Name	Organization	Country
Vivek Ramkumar	International Advocacy and Open Budget Initiative	U.S.

COMMENT # 7

Read [full comment](#)

Name	Organization	Country
Samuli Liuskari	The Finnish NGDO Platform to EU Kehys	Finland

COMMENT # 8

Read [full comment](#)

Name	Organization	Country
Lesya Shevchenko	Open Society Foundation	Ukraine

COMMENT # 9

Dear Colleagues,

Please [find attached](#) our comments to the IMF Fiscal Transparency Code (Consultation draft of July 1, 2013).

Name	Organization	Country
Susanne Kuehn	Transparency International	Germany

COMMENT # 10

Dear IMF colleagues,

Thank you very much for giving us the opportunity to participate in the consultation process around the IMF's revised fiscal transparency code. We very much welcome this opportunity to provide our thoughts on the draft code.

Please [find attached](#) Transparency International's comments in response to your call for comments.

Please let us know if you have any questions and we will be happy to explain or elaborate further.

Name	Organization	Country
Nicolas Mombrial	Oxfam International	U.S.

COMMENT # 11

Dear Sir, Madam,

Please [find attached](#) Oxfam's submission to the consultation on the IMF revised draft of the fiscal transparency code.

Our submission also includes our answers to question raised by our colleagues from New Rules for Global Finance (in charge of helping with the CSO feedback for this consultation) as we felt it was worth sharing them directly with the IMF as we think they add value to the consultation.

All the best

Name	Organization	Country
Amir Shafaie	Revenue Watch Institute	U.S.

COMMENT # 12

Dear Madam or Sir,

In response to the call for comments, please [find attached](#) inputs from the Revenue Watch Institute in respect of the revised draft of the IMF Fiscal Transparency Code.

My colleagues and I look forward to continuing discussions on this important publication and the eventual revision of the Guide on Resource Revenue Transparency.

Kind regards

Name	Organization	Country
Anders Pedersen	The Open Knowledge Foundation	U.K.

COMMENT # 13

Read [full comment](#)