

AIC decision on appeal #87

CASE NUMBER AI7181 FAMINE ACTION MECHANISM (Decision dated November 3, 2021)

Summary of Decision

- As part of its due diligence on appeals, the Access to Information Committee (“AIC”) seeks the relevant business unit’s views on the possible disclosure of the requested information in light of the appeal. In this case, after extensive consultations with the relevant business unit, 27 documents were identified and found to be responsive to the request. Out of such 27 documents:
 - (a) 23 documents were made publicly available;
 - (b) one document was identified as restricted by the *Corporate Administrative Matters* exception; and
 - (c) three documents were identified as restricted by the *Information Provided by Member Countries or Third Parties in Confidence* exception.

Based on the above, the AIC considered the appeal on a public interest basis solely with respect to the information that remained restricted from public access as listed in paras. (b) and (c) above.

- **Public Interest.** The AIC found no compelling reason to override the *Corporate Administrative Matters* exception restricting access to one document identified as responsive to the request. For this reason, the AIC upholds the Bank’s decision to deny access to this piece of information. Furthermore, the AIC found that the remaining portion of the information restricted by the *Information Provided by Member Countries or Third Parties in Confidence* exception is not subject to public interest appeals; this portion of the public interest appeal is dismissed.

The Decision

Facts

1. On September 11, 2020, the World Bank (“Bank”) received a public access request (“Request”) seeking access to (in relevant part):

[A]ll available documents on the Famine Action Mechanism (FAM) announced in September 2018 in collaboration with Microsoft Corp., Google and Amazon Web Services. My request covers documents including but not limited to internal briefing notes of the World Bank and e-mails and other correspondence with partners such as Microsoft, Google and Amazon as well as other available material. Further, I would like to ask for a state of play on the project. (“Requested Information”).

2. On April 7, 2021, during the consultations carried out under the request phase, the Bank asked the requester to clarify whether s/he was seeking access to the information related to the Bank’s partnership and work with Microsoft, Google, and Amazon Web Services and/or to a different document/information. The requester responded on the same day confirming s/he “would like to obtain all documents and information relating to Microsoft, Google, and Amazon Web Services”.

3. On April 8, 2021, and pursuant to the requester’s clarifications on the Request, the Bank consulted the responsible business unit again to seek its views on the Requested Information as further clarified by the requester.

4. On June 25, 2021, the Bank issued its decision providing access to a portion of the Requested Information and denying access to the remaining portion of the Requested Information based on the *Information Provided by Member Countries or Third Parties in Confidence* and the *Deliberative Information* exceptions under the AI Policy. The portion of the Requested Information publicly available at the time is as follows:

- (a) [Project Artemis - Project Agreement](#);
- (b) [Predicting Food Crises - Working Paper Methods #1](#);
- (c) [Stochastic Modeling of Food Insecurity - Working Paper Methods #2](#); and
- (d) [Predicting Food Crises 2020, Dataset for Reproducing Working Paper Results](#).

5. On July 26, 2021, the requester filed an appeal challenging the Bank’s denial; the appeal was filed on the basis that there is a “public interest” case to override the AI Policy exceptions that restrict public access to the information (“Application”).

6. On July 29, 2021, the AIC Secretariat consulted the responsible business unit to seek its views on the possible disclosure of the Requested Information in light of the Application.

7. On September 1, 2021, after further exchanges with the AIC Secretariat, the responsible business unit provided 27 documents that the AIC found to be responsive to the Request. Out of such 27 documents:

(a) 23 documents were made publicly available as follows:

- (i) [Rome Agenda 942018. “Project Artemis - Technical Working Session”](#);
- (ii) [Cameron World Bank Microsoft](#);
- (iii) [AWS Presentation](#);
- (iv) [World Bank Results interpretation presentation](#);
- (v) [Artemis - Rome 2018 - Session 1](#);
- (vi) [Artemis Paris Update Presentation](#);
- (vii) [Artemis Rome 2018 Model Validation](#);
- (viii) [IPC ATARI WG Artemis Presentation](#);
- (ix) [Thresholds and Triggers](#);
- (x) [Artemis Presentation 3 May18](#);
- (xi) [FAM Presentation 1 Rome](#);
- (xii) [Rome January 2020](#);
- (xiii) [FAM Presentation 2 Rome 5SEP18](#);
- (xiv) [FAM Jan15 Parametric Results 14Jan19](#);
- (xv) [Project Artemis - Project Agreement Microsoft Corporation](#);
- (xvi) [Predicting Food Crises - Working Paper Methods #1](#);
- (xvii) [Stochastic Modeling of Food Insecurity - Working Paper Methods #2](#);
- (xviii) [Predicting Food Crises 2020, Dataset for Reproducing Working Paper Results](#);
- (xix) [Artemis Presentation Data and Analytics Washington April 2018](#);
- (xx) [Linking Food Security Analytics with FAM: Setting the Stage and Moving Ahead, January 15, 2019](#);
- (xxi) [Discussion on Approaches to Predictive Modelling of Famine, May 22, 2018](#);
- (xxii) [Real Time Pilot Model, Predicted Probabilities of Critical States of Food; Insecurity in Somalia \(Bank Presentation to Artemis All Technical Teams\)](#); and
- (xxiii) [FAM Launch Press release, September 23, 2018](#).

(b) one document was identified as restricted by the *Corporate Administrative Matters* exception; and

(c) three documents were identified as restricted by the *Information Provided by Member Countries or Third Parties in Confidence* exception.

8. On September 29, 2021, the AIC held its regular meeting.

Findings and Related Decisions

9. In reviewing the Application in accordance with the AI Policy, the AIC considered:
- (a) the Request;
 - (b) the Bank's response to the Request and initial denial of access to part of the Requested Information;
 - (c) the Application;
 - (d) inputs from the relevant business unit;
 - (e) the AI Policy's *Information Provided by Member Countries or Third Parties in Confidence and Corporate Administrative Matters* exceptions restricting access to a portion of the Requested Information; and
 - (f) the public interest nature of the appeal.

“Public Interest” case

10. Pursuant to the AI Policy, a requester who is denied public access to information by the Bank may file an appeal on a “public interest” basis if the requester is able to make a public interest case to override certain AI Policy exceptions that restrict public access to the information (*see* AI Policy, at Section III.B.8.(a).ii). Public interest appeals are limited to information restricted by the *Corporate Administrative Matters, Deliberative Information, and/or Financial Information* (other than banking and billing information) exceptions (*see id.*). Under the AI Policy, for appeals that assert a public interest case to override an AI Policy exception, the decision of the AIC is final (*see* AI Policy, at Section III.B.8.(b).i).

11. The AIC considered whether the public interest assertion in the Application merited overriding the *Corporate Administrative Matters* exception restricting access to one document responsive to the Request. Under the AI Policy, the Bank does not provide access to information relating to the Bank's corporate administrative matters, including, but not limited to, corporate expenses, procurement, real estate, and other activities (*see* AI Policy, at Section III.B.2.(h)). The AIC found that the document restricted by the *Corporate Administrative Matters* exception corresponds to an internal email exchange that contains information regarding the Bank's security and access controls standards and requirements for using an online application. The AIC considered the business unit's views on the possible disclosure of this information and the impact of such disclosure, vis-à-vis the claimed public interest in the Application.

12. The AIC found no compelling public interest basis to override the *Corporate Administrative Matters* exception in this case. For this reason, the AIC decided to uphold the Bank's decision to deny access to the portion of the Requested Information solely restricted by the *Corporate Administrative Matters* exception.

13. Finally, the AI Policy does not allow the restriction of information pursuant to the *Information Provided by Member Countries or Third Parties in Confidence* exception to be appealed on public interest grounds (*see* AI Policy, at Section III.B.8.(a).ii). Accordingly, the portion of the Application that appeals the Bank's denial of access to information restricted by the *Information Provided by Member Countries or Third Parties in Confidence* exception on public interest grounds is hereby dismissed as it is not properly before the AIC for consideration (*see* AI Policy, at Section III.B.8.(a).ii, and AI Policy Directive/Procedure, at Section III.D.1.a.iii).

14. Under the AI Policy, for appeals that assert a public interest case to override an AI Policy exception, the decision of the AIC is final (*see* AI Policy, at Section III.B.8.(b).i).