

IRM Guidance on Commenting

PRE-PUBLICATION REVIEW

After internal review, the Independent Reporting Mechanism (IRM) invites each OGP-member and 3-4 civil society organizations (CSOs) or multi-stakeholder forum (MSF) members to review products in draft form before they are shared for broader public comment. The process of gathering comments at this stage in the production process is known as “pre-publication review.”

It entails the following:

Scope of commenting

The pre-publication comment period ensures that governments and civil society organizations have the opportunity to review a draft of the product and offer additional information, clarifications, and evidence. This period is also used by IRM staff to validate findings or ask stakeholders specific questions to fill gaps of information that may persist after the internal review. The IRM will take into account pre-publication comments and inputs before finalizing the draft products for publication. However, neither party has veto power over any section of the products.

Comments received will not be made public with the IRM product and can be considered confidential. During this period, the IRM retains the right to share copies of the draft product on an embargoed basis with experts in the country who can help to ensure the highest quality of reporting.

Time frame

The pre-publication review period extends for a period of three weeks (21 calendar days) following delivery of the IRM product. In fairness to all members and to manage a timely review process no extensions can be granted. The IRM highly recommends that OGP members facing challenges to submit comments in time alert their IRM staff point of contact with time in advance.

Post-comment communication

In cases where comments merit additional verification, the IRM may need to contact government representatives in charge of the OGP process and CSOs that participated in the pre-publication review for additional information. In order to facilitate ease of communication, there is a strong preference for informal communications. The IRM takes each comment seriously in the interest of producing fair and usable reports.

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Due to the volume of reporting, the IRM is unable to respond to individual comments in writing. However, IRM staff will communicate with governments and/or civil society to provide general feedback on incorporation of pre-publication review comments.

Responding to pre-publication comments

The IRM takes all comments during the pre-publication period very seriously and evaluates each one based on a standard approach. As a matter of course, the IRM does not publish comment-by-comment responses, but staff is available to respond to particular queries.

The IRM uses a color coding approach to classify and resolve comments that come in from governments or civil society as shown in the table below.

<p>Green (To be added)</p>	<ul style="list-style-type: none"> ● Simple corrections, omissions or typos (e.g. date of joining, mistranslation of OGP documents, names of institutions/ organizations, numbering etc.) ● Additional simple, non-controversial information worth integrating into the report that will not affect coding. ● Requests to make input anonymous. ● Corrections or re-wording of direct quotes requested by the interviewee.
<p>Yellow (Will be considered, weighing evidence for change and further verification)</p>	<ul style="list-style-type: none"> ● Information that would change data coding ● Information on consultation practices, summaries, or websites that is undocumented ● New information on activities or views ● Requests to expand certain sections to cover more information ● Requests for changes to findings in light of new evidence, additional information or perspectives.
<p>Red (Will not be incorporated)</p>	<ul style="list-style-type: none"> ● Information that is outside the scope of the respective IRM product's purview. ● Requests to remove sections of content. ● Requests to remove stakeholder viewpoints ● Requests to change recommendations and next steps sections ● Requests to remove anonymity

