

## **ISPCP Comments on the**

### **Third Accountability and Transparency Review Team (ATRT3) Final Report**

The ISPCP, together with the IPC, presented a Minority Dissent Statement to the ATRT3 Final Report. In particular we had objections both to some recommendations in the final report as well as the procedures of the Review Team.

Our objections were basically to the Recommendation in Section 8 - Assessment of Periodic (now Specific) and Organizational Reviews. We want to reiterate our dissent with the Final Report.

We have objections to the procedures followed by the ATRT3 regarding the significant difference between the recommendation on Reviews in the Draft Report, presented to Public Comment, and the corresponding recommendation in the Final Report. The recommendation in the draft report regarding organizational reviews differs greatly from the corresponding recommendation in the Final Report and it wasn't proposed in any of the public comments to the Draft Report.

Also, regarding procedures, it is to be noted that, even though 78% of the individuals and 90% of the Structure expressed in the Survey (Annex B) their support for the use of external consultants in the reviews, and this was also supported in many of the comments to the Draft Report, there is no mention of external consultants in the recommendation on reviews. Even when in the Bylaws is clearly stated that the Organizational Reviews should be done "by an entity or entities independent of the organization under review", this has been overlooked with the argument that allowing the participation of all the SO/AC guarantees independence, which is a highly controversial statement. We think this reduces the transparency of the reviews and diminishes the accountability of the SO, AC and NomCom.

Finally, Annex E was submitted to the whole of the ATRT3 as a draft and was never discussed prior to its inclusion in the Final Report. This Annex contains the answers of the ATRT3 to the Public Comments on the Draft Report, besides it no having been discussed inside the ATRT3, we don't know who drafted it or who reviewed it, the fact is that, regarding in particular to Reviews, some comments were overlooked or mischaracterized.

The ATRT3 Final Report recommendations of Section 8 (Assessment of Periodic (now Specific) and Organizational Reviews) have not been adequately justified. Specific and Organizational Reviews are the only practical accountability mechanisms remaining, and they should not be curtailed. The following are points of particular concern because they undermine the recommendations reached by the ATRT3:

The suspension of SSR Reviews because SSR2 has not yet completed its work.

Postponing the decision on when and if any future SSR Review might take place until the conclusion of ATRT4 effectively means that decision is pushed off until 2027 at the earliest, unless the Board overrules the ATRT3 recommendation.

Removing RDS Reviews. The Final Report states that the work of the EPDP will clearly impact the need for RDS Reviews, it is not clear how.

The substitution of the independent Organizational Reviews with self-reviewed Continuous Improvement Programs. It is not clear how this recommendation, which is quite different from the proposal in the Draft Report, was developed. We support the original idea of maintaining the independent Organizational Reviews but limiting their duration to one year as for the ATRT.

An explanation is required to disclose how 'consensus' has been determined on Section 8. The minority dissent statements submitted by 4 of the 16 members of the ATRT3 questions the designation of 'consensus' for these recommendations.