

## Letter to the World Bank Executive Directors

March 11, 2021

SUBJECT: **Ceasing publication of the Doing Business Report**

We write as concerned members of the civil society organisations, academia and trade unions to call upon the World Bank's board of executive directors to end the publication of the World Bank's *Doing Business Report*. As you are aware, the *Doing Business Report* has been the focus of longstanding and well-substantiated criticisms, including from [academics, legal experts](#), civil society organisations and [trade unions](#). Even high-level former [UN](#) and [OECD officials](#) have questioned the report. These criticisms have been raised on [several grounds](#), including methodology, data selection and scope, questionable robustness of the aggregate rankings, and its anti-regulation bias.

The 2013 [Independent Panel Review](#) commissioned by the World Bank issued valuable recommendations, but the institutional response was limited. The panel recommended that the use of rankings be discontinued. It also recommended the permanent deletion of the labor market flexibility and tax rate indicators, as the latter penalizes countries that require businesses to [pay corporate taxes](#) or make [contributions to social security](#), pensions and other social protection schemes that support households.

In 2018 Paul Romer, then the World Bank's chief economist, said that "[political motivation](#)" of Bank staff may have contributed to a decline in Chile's ranking under the social democratic President Michelle Bachelet. An [audit commissioned](#) by the Bank in 2018 found no evidence of interference, but detailed that "frequent methodology changes reduce the value of the indicators to researchers, policy makers and the media".

The result is a high-stakes competition among countries, despite the foundational problems of the index and the limited meaning of year-over-year ranking comparisons. The outsized influence of the report undermines the broader policy engagement of the Bank by pushing governments toward unbalanced and short-term policymaking that is not actually beneficial for business, jobs, or sustainable development. The high-stakes nature of index positions may have also created the incentives for interference. As the world struggles to respond to and recover from the health and economic crises triggered by the Covid-19 pandemic, the consequences of the deregulatory race-to-the-bottom incentivised by the *Doing Business Report* and its world rankings have become painfully evident.

For too long, the *Doing Business Report* has encouraged policies that have worsened inequalities – including deregulations which exacerbated the global gender and racial division of labour –, eroded labor protections and domestic resource mobilisation capacity, suppressed domestic aggregate demand and economic diversification and thus strained the legitimacy of state institutions.

As [UNCTAD's latest Trade and Development Report](#) stresses, a just recovery will require that the world addresses a key weak aspect of the development paradigm: "Mainstream economic analysis has contributed to the lack of preparedness of policymakers by promoting the wrong notion of resilience – one focused on doing business and foreign investors, rather than good jobs and income security – with an attendant narrowing of the aims and objectives of economic policy."

Efforts to investigate data irregularities are welcomed in the interest of transparency. However, the problem goes much deeper and cannot be resolved by tinkering at the edges. The underlying premises of the *Doing Business Report* are not supported by evidence and contradict the objectives of a just recovery. This is why its publication should cease.

Sincerely,

The undersigned 346 civil society organisations, social movements, trade unions, academics and independent experts from 75 countries

**Global/International Groups**

1.	Academics Stand Against Poverty	Global
2.	ActionAid International	Global
3.	Association for Women's Rights in Development (AWID)	Global
4.	Big Shift Global	Global
5.	Bretton Woods Project	Global
6.	CADTM (Committee for the Abolition of Illegitimate Debt)	Global
7.	Center for Economic and Social Rights (CESR)	Global
8.	Corporate Accountability	Global
9.	DAWN (Development Alternatives with Women for a New Era)	Global
10.	European Services Strategy Unit	Global
11.	Feminist Alliance for Rights (FAR)	Global
12.	Feminist Task Force	Global
13.	FIAN International	Global
14.	FIDH (International Federation for Human Rights)	Global
15.	Fight Inequality Alliance	Global
16.	FOKUS - Forum for Women and Development	Global
17.	Global Alliance for Tax Justice	Global
18.	Global Initiative for Social, Economic and Cultural Rights (GI-ESCR)	Global
19.	Global Labour University Online Academy	Global
20.	Global Policy Forum	Global
21.	Global Social Justice	Global

22.	GRAIN	Global
23.	Health Poverty Action	Global
24.	Indigenous Peoples Global Forum for Sustainable Development, IPGFforSD	Global
25.	Institute for Agriculture and Trade Policy	Global
26.	International Open Network	Global
27.	International Trade Union Confederation	Global
28.	International Transport Workers' Federation	Global
29.	International Women's Anthropology Conference	Global
30.	International Women's Rights Action Watch - Asia Pacific	Global
31.	Oxfam	Global
32.	Public Services International	Global
33.	Regions Refocus	Global
34.	Social Watch	Global
35.	Society for International Development	Global
36.	Tax Justice Network	Global
37.	Transnational Institute	Global
38.	Tripla Difesa Onlus Global Internazionale No Violence	Global
39.	Urgent Action Fund for Women's Human Rights	Global
40.	Wellbeing Economy Alliance (WEAll)	Global
41.	Womankind Worldwide	Global

#### **European Region**

42.	AFRD Georgia	Georgia
43.	African Women 4 Empowerment e.V.	Germany
44.	Alliance Sud	Switzerland
45.	Both ENDS	The Netherlands
46.	Bread for all	Switzerland
47.	CAFOD (Catholic Agency for Overseas Development)	United Kingdom
48.	CCFD-Terre Solidaire	France
49.	CNCD-11.11.11	Belgium

50.	Comisiones Obreras (CCOO)	Spain
51.	Corporate Europe Observatory	Europe
52.	CROSOL – Croatian Platform for International Citizen Solidarity	Croatia
53.	DemNet Foundation for Development of Democratic Rights	Hungary
54.	Dziewuchy Berlin	Germany
55.	Ekta Parishad – Belgique	Belgique
56.	Ekumenická akademie (Ecumenical Academy)	Czech Republic
57.	ETUC (European Trade Union Confederation)	Belgium
58.	Eurodad	Belgium
59.	Europe solidaire sans 4rontiers (ESSF)	France
60.	FNV (The Netherlands Trade Union Confederation)	The Netherlands
61.	Fresh Eyes – People to People Travel	United Kingdom
62.	Institut Rousseau	France
63.	ISMERI EUROPA SRL	Italy
64.	Jubilee Scotland	Scotland, United Kingdom
65.	K.U.L.U.-Women and Development (KULU)	Denmark
66.	Lithuanian NGDO Platform	Lithuania
67.	National Society of Conservationists – Friends of the Earth Hungary	Hungary
68.	NHS – Independent Trade Unions of Croatia (ITUC, ETUC)	Croatia
69.	Observatori del Deute en la Globalització	Spain, Catalonia
70.	Oikos – Cooperação e Desenvolvimento	Portugal
71.	Paul Dembinski – Observatoire de la Finance	Switzerland
72.	Recourse	The Netherlands
73.	Social Justice in Global Development	Germany
74.	SOC-SAT Andalucia (Sindicato Andaluz de Trabajadores )	Spain
75.	SOL (alternatives agroécologiques et solidaires)	France
76.	UndebtedWorld	Greece
77.	Universidad de Salamanca	Spain
78.	Urgewald	Germany

79.	WECF – Women Engage for a Common Future	The Netherlands
80.	Wemos	The Netherlands
81.	Zukunftskonvent Germany	Germany
<b>Asia and Pacific Region</b>		
82.	ACT NOW!	Papua New Guinea
83.	Aid Organization	Bangladesh
84.	Ain o Salish Kendra (ASK)	Bangladesh
85.	All India Forum for Right to Education	India
86.	Alliance of Government Workers in the Water Sector (AGWWAS)	Philippines
87.	Asia Pacific Forum on Women, Law and Development (APWLD)	Asia and the Pacific
88.	Association For Promotion Sustainable Development	India
89.	Association of Kerala Water Authority Officers	India
90.	Association of War Affected Women	Sri Lanka
91.	Australian Food Sovereignty Alliance	Australia
92.	Bayansharga NGO	Mongolia
93.	Bharat Jan Vigyan Jatha BJVJ	India
94.	Center for Promoting Democracy	India
95.	Centre for Budget Governance and Accountability (CBGA)	India
96.	Centre for Financial Accountability (CFA)	India
97.	Centre for Human Rights and Development	Mongolia
98.	CLEAN (Coastal Livelihood and Environmental Action Network))	Bangladesh
99.	Community Empowerment and Social Justice Network (CEMSOJ)	Nepal
100.	Dalit NGO Federation	Nepal
101.	DIGNIDAD Movement	Philippines
102.	Diverse Voices and Action (DIVA) for Equality	Fiji
103.	Earth Economics Lab (EEL)	India
104.	Empower India	India
105.	EMPOWER Malaysia	Malaysia
106.	femLINKpacific - Media Initiatives for Women	Fiji

107.	Fiji Women's Rights Organisation	Fiji
108.	Focus on the Global South	Asia
109.	Freedom from Debt Coalition	Philippines
110.	Freelance journalist	India
111.	Human Rights and Justice Centre	Nepal
112.	Inclusive Media for Change ( <a href="http://www.im4change.org">www.im4change.org</a> )	India
113.	Indian Social Action Forum	India
114.	Indigenous Perspectives	India
115.	International Women's Development Agency (IWDA)	Asia and the Pacific
116.	It's Our Future NZ	New Zealand
117.	Joint Action for Water	India
118.	Jubilee Australia	Australia
119.	LEOS - Women's National NGO	Mongolia
120.	Lok Shakti Abhiyan	India
121.	Machhimar Adhikar Sangarsh Sangathan	India
122.	Manthan Adhyayan Kendra	India
123.	Mohd Arif Business Educational World (MABEW)	India
124.	Mongolian National Association of Wheelchair Users	Mongolia
125.	Mongolian Women's Employment Support Federation	Mongolia
126.	Nadi Ghati Morcha	India
127.	NAPM (National Alliance of People's Movements)	India
128.	National Alliance of People's Movements	India
129.	National Campaign for Sustainable Development Nepal	Nepal
130.	National Center Against Violence	Mongolia
131.	National Hawkers Federation	India
132.	Nepal Alternative Research Society (NARS)	Nepal
133.	New Trade Union Initiative	India
134.	NGO Forum on ADB	Asia Regional
135.	Oil Workers' Rights Protection Organization Public Union	Азербайджан (Azerbaijan)

136.	Oyu Tolgoi Watch	Mongolia
137.	Pacific Network on Globalisation	Pacific Islands
138.	Pakistan Fisherfolk Forum	Pakistan
139.	Pakistan Kissan Rabita Committee	Pakistan
140.	Participatory Research Action Network- PRAN	Bangladesh
141.	People's Health Movement Australia	Australia
142.	Platform for Social Justice	India, Maharashtra
143.	Psychological Responsiveness NGO	Mongolia
144.	Radha Paudel Foundation	Nepal
145.	RIGHTS Foundation	Indonesia and Malaysia
146.	RIHRDO (Rural Infrastructure and Human Resource Development Organization)	Pakistan
147.	rites Forum	India
148.	Rural Area Development Programme (RADP)	Nepal
149.	Rural Infrastructure & Human Resource Development Organization (RIHRDO)	Pakistan
150.	Sayanaa Wellbieng Association NGO	Mongolia
151.	Steps Without Borders NGO	Mongolia
152.	The Center for Women in Twenty-First Century NGO	Mongolia
153.	The Gender Security Project	India
154.	Trade Union Joint Action Committee (MAHARASHTRA)	India, Mumbai
155.	Tuva eej NGO	Mongolia
156.	URD (Universal Rights and Development) NGO	Mongolia
157.	Youth For Environment Education And Development Foundation (YFEED Foundation)	Nepal
158.	छत्रपती शाहू महाराज विचार मंच	India

#### **South, Central and North America Regions**

159.	Afirmación Profesional	Argentina
160.	ALAMES Bolivia (Asociación Latinoamericana De Medicina Social y Salud Colectiva)	Bolivia
161.	Asociacion Ambiente y Sociedad	Colombia

162.	Canadian Labour Congress	Canada
163.	Center for Democratic Education	United States
164.	CENTRO DE PROMOCIÓN Y EDUCACIÓN PROFESIONAL VASCO DE QUIROGA	Mexico
165.	Centro Interdisciplinario de Investigación y Desarrollo Alternativo U Ylch Lu'um, AC	México
166.	CGTP (Confederación General de Trabajadores del Perú)	Peru
167.	Comisión Nacional de Enlace	Costa Rica
168.	Congregación NSC Buen Pastor	Ecuador
169.	DECIDAMOS, Campaña por la expresion ciudadana	Paraguay
170.	Democratic Socialists of America — International Committee, Economics & Trade Subcommittee	United States
171.	Derecho Ambiente y Recursos Naturales	Peru
172.	Equidad de Género: Ciudadanía, Trabajo y Familia	Mexico
173.	Foro Permanente de Política Exterior	Chile
174.	Freshwater Action Network Mexico	México
175.	Friends of the Earth US	United States
176.	Fuerza Mundial - Continuum	United States/Global
177.	Fundación Ambiente y Recursos Naturales (FARN)	Argentina
178.	Fundacion SES	America Latina y el Caribe
179.	Gender Action	United States
180.	Gestos (soropositividade, comunicação, gênero)	Brazil
181.	Global Institute for Sustainable Prosperity	United States
182.	GREPPE/Grupo de Estudos e Pesquisas em Politicas Educacionais e Rellappe	Brazil
183.	Grupo de Estudos e Pesquisas sobre Educação Superior da Universidade Federal do Pará	Brazil
184.	La Asamblea Veracruzana de Iniciativas y Defensa Ambiental (LAVIDA)	México
185.	Latindadd	Paraguay
186.	Local Futures	United States
187.	Mesa de Vinculacion Mecanismo Sociedad Civil Foro Desarrollo Social	America Latina y el Caribe



188.	Movimiento Nacional Campesino Indígena CLOC La Via Campesina	Argentina
189.	MY World Mexico	Mexico
190.	National Family Farm Coalition (NFFC)	United States
191.	Partners for the Land & Agricultural Needs of Traditional Peoples	United States
192.	Peronismo	Argentina
193.	Project on Organizing, Development, Education and Research (PODER)	Mexico and Latin America
194.	Protección Internacional Mesoamérica	Centroamérica y México
195.	Reaccion Climatica	Bolivia
196.	Servicios Ecumenicos para Reconciliacion y Reconstruccion - SERR	United States
197.	Sisters of Charity Federation	United States
198.	The Oakland Institute	United States
199.	The Somist Institute	United States
200.	Win Without War	United States

#### **Africa and MENA Regions**

201.	AbibiNsroma Foundation	Ghana
202.	Africa Faith and Justice Network	Africa
203.	African Centre for Biodiversity	South Africa
204.	African Coalition for Corporate Accountability	South Africa
205.	African Forum and Network on Debt and Development	Africa
206.	Akina Mama wa Afrika	Uganda
207.	Alliance for Empowering Rural Communities	Ghana
208.	Alternative Information and Development Centre	South Africa
209.	Arab Watch Coalition	Morocco
210.	Association pour la défense des droits à l'eau et à l'assainissement	Sénégal
211.	Bella Foundation for Child and Maternal Care	Nigeria
212.	Buliisa Initiative for Rural Development Organisation (BIRUDO)	Uganda
213.	Centre d'Etude et d'Appui au Développement (CEAD)	Guinea
214.	Common Ground for Africa	Kenya

215.	DUKINGIRE ISI YACU	Burundi
216.	Foundation for Environmental Management and Campaign Against Poverty	Tanzania
217.	Green Advocates International	Liberia
218.	Initiative for Educational and Economic Development (INEAED)	Nigeria
219.	Initiative for Social and Economic Rights (ISER)	Uganda
220.	Jamaa Resource Initiatives	Kenya
221.	Lumière Synergie pour le Développement	Sénégal
222.	Member in the truth and dignity commission	Tunisia
223.	Nawi - Afrifem Macroeconomics Collective	Kenya
224.	New Women Foundation	Egypt- MENA
225.	OSIWA (Open Society Initiative for West Africa)	Sierra Leone
226.	Regional Center for International Development Cooperation (RCIDC)	Uganda
227.	Réseau Camerounais des Organisations des Droits de l'Homme / Cameroon Network of Human Rights Organisations	Cameroon
228.	Reseau des ONG et associations de développement de défense des droits de l'homme et de la démocratie (RODADDHD)	Niger
229.	Success Capital Organisation	Botswana
230.	Syndicat National du Personnel des Collectivités Territoriales de Cote d'Ivoire	Cote d'Ivoire
231.	Tax Justice Network Africa	Africa
232.	TRANS GIRLS CAN-TGC	DRC
233.	Uganda Coalition for Sustainable Development / INFORSE East Africa	Uganda
234.	Witness Radio - Uganda	Uganda
235.	Zimbabwe Smallholder Organic Farmers Forum (ZIMSOFF)	Zimbabwe

#### **Academics and Independent Experts**

236.	Aaron Schneider, University of Denver	United States
237.	Abay Ezra, Addis Ababa University	Ethiopia
238.	Abu Shonchoy, Florida International University	United States
239.	Agha Haroon Akram-Lodhi, Trent University	Canada

240.	Alex Izurieta, UNCTAD/ Senior Economist	Global
241.	Alfredo Saad Filho, King's College London	United Kingdom
242.	Alicia Puyana Mutis, Facultad Latinoamericana de Ciencias Sociales	Mexico
243.	Amitabh Pandey, Daily Akhand Doot Newspaper	India, Madhya Pradesh
244.	Amjad Rabi	Canada
245.	Anamitra Roychowdhury, Jawaharlal Nehru University, New Delhi	India
246.	Andrea Saltelli, Uversitat Oberta de Catalunya (UOC), Barcelona	Spain
247.	Andreas Novy, Vienna University of Economics and Business (WU Vienna)	Austria
248.	Andrew M. Fischer, Erasmus University Rotterdam	Netherlands
249.	Anil T Varghese, Anik	India
250.	Anis Chowdhury, Western Sydney University	Australia
251.	Anne-Marie Bossy Cornford	Genève
252.	Anupam Mitra, Punjab National Bank Employees Federation of India	India
253.	Atef Soliman, Gatef organization	Egypt
254.	Barun Chatterjee	India
255.	Basani Baloyi, Institute for Economic Justice	South Africa
256.	Bruno Bonizzi, University of Hertfordshire	United Kingdom
257.	C P Chandrasekhar, Economic Research Foundation	India
258.	Carla García Zendejas, Center for International Environmental Law (CIEL)	United States
259.	Chris Faugere, Kedge Business School	France
260.	Christoph Scherrer, University of Kassel	Germany
261.	Claudio Schuftan	Global
262.	Daniel Kostzer, International Labour Organization	Asia and the Pacific
263.	David McDonald, Municipal Services Project	Canada
264.	Devika Dutt, University of Massachusetts Amherst	United States
265.	Diane Elson, Emeritus Professor, University of Essex	United Kingdom
266.	Dimitri Papadimitriou, Levy Economics Institute	United States
267.	Dr Margot Salomon, Law Department, London School of Economics	United Kingdom

268.	Dr Michael Cichon	Germany
269.	Dr. Mira Shiva	India
270.	Dr. Oliver C. Ujah, Aces-Key Consulting Ltd	Ghana, West Africa
271.	Eduardo Strachman, São Paulo State University - UNESP	Brazil
272.	Elisa Van Waeyenberge, SOAS, University of London	United Kingdom
273.	Filip Stefanovic, Trade Union Advisory Committee to the OECD	France
274.	Frances Stewart, University of Oxford	United Kingdom
275.	Francine Mestrum, Global Social Justice	Global
276.	Francis Cripps, Alphametrics	Thailand
277.	Gabriele Koehler	Germany
278.	Garima Bhalla	India
279.	Gregory Andrusz, Retired emeritus professor of comparative sociology	Europe
280.	Hari Roka, ex Member of Parliament, Nepal	Nepal
281.	Heather Nicholson	United States
282.	Helmut Reisen	Germany
283.	Ilene Grabel, Distinguished University Professor, Josef Korbel School of International Studies, University of Denver	United States
284.	Isabel Ortiz, former Director at ILO and UNICEF	Global
285.	Jan Vandemoortele, Formerly with UNICEF	Belgium
286.	Javier Varela Marimón	Spain
287.	Jayati Ghosh, University of Massachusetts at Amherst	United States
288.	João P.C. Guimarães	Portugal
289.	José Antonio Ocampo, Professor, Columbia University	United States
290.	Jose Antonio Romero Tellaache, El Colegio de México	México
291.	Juan Pablo Bohoslavsky, former Independent Expert on Foreign Debt and Human Rights (2014-2020)	Argentina
292.	K K Kailash, Department of Political Science, University of Hyderabad	India
293.	Kamal Chenoy, JNU retired professor	India
294.	Kenneth Surin, Duke University USA	United States
295.	Korkut Boratav, Turkish Social Science Association	Turkey

296.	Kyla Sankey, PSIRU University of Greenwich	United Kingdom
297.	Lena Dominelli	United Kingdom
298.	Luis D. Rosero, Framingham State University	United States
299.	Luis Reyes, Kedge Business School	France
300.	Machiko Nissanke, SOAS, University of London	United Kingdom
301.	Magdalena Sepúlveda, Executive Director of GI-ESCR and Former UN Special Rapporteur on Extreme Poverty and Human Rights (2008-2014)	Global
302.	Manfred Nitsch, Freie Universitaet Berlin, Professor Emeritus of Political Economy	Germany
303.	Manohar Rao Janga, University of Hyderabad	India
304.	Marion Cohen	France
305.	Marjan Nikolov, Center for Economic Analyses, North Macedonia	North Macedonia
306.	Marta Kuc-Czarnecka, Gdansk Univeristy of Technology	Poland
307.	Matias Vernengo, Bucknell University	United States
308.	Matthew Cummins	Kenya
309.	Milford Bateman, Juraj Dobrila University at Pula	Croatia
310.	Murat Öztürk, Kırklareli University	Turkey
311.	Mustafa Özer, Anadolu University, professor	Turkey
312.	MV Srinivasan, National Council of Educational Research and Training (NCERT)	India
313.	Nicholas Shaxson, Author, Treasure Islands and The Finance Curse	United Kingdom and Germany
314.	Nimi Hoffmann, University of Sussex	United Kingdom
315.	Nitin Bisht, Indian Institute of Technology Roorkee	India
316.	Omar Al Bizri, Ex UNESCWA	Lebanon
317.	Oscar Ugarteche, UNAM	Mexico
318.	P. Sai-wing Ho, University of Denver	United States
319.	Pasquale De Muro, Roma Tre University	Italy
320.	Paul Robert Gilbert, University of Sussex	United Kingdom
321.	Pierre Habbard, Trade Union Advisory Committee to the OECD	France
322.	Pierre J. Hamel, Institut national de la recherche scientifique (INRS)	Québec

323.	Prabha Khosla, Canadian Research Institute for the Advancement of Women (CRIAW-ICREF)	Canada
324.	Prof Jimi Adesina, University of South Africa	South Africa
325.	Prof Sir Richard Jolly, IDS- Institute of Development Studies, Sussex	United Kingdom
326.	Prof Susan Engel, University of Wollongong	Australia
327.	Professor Michael Noble, Southern African Social Policy Research Institute	South Africa/United Kingdom
328.	Radhika Balakrishnan, Rutgers University	Global
329.	Rick Rowden, American University	United States
330.	Sandra Polaski, Boston University Global Development Policy Center	United States
331.	Sanjay Reddy, The New School for Social Research	United States
332.	Sarang Yadwadkar	India
333.	Sergio Cesaratto, University of Siena	Italy
334.	Sílvia Lopez, New York University	Mexico
335.	Siobhan Airey, University College Dublin	Ireland
336.	Sonia Phalatse, Institute for Economic Justice	South Africa
337.	Subash Sharan, SHS & ASSOCIATES	India
338.	Susan Spronk, Municipal Services Project	Canada
339.	Tarron Khemraj, New College of Florida	United States
340.	Theresa Adriao, University of Campinas (UNICAMP)	Brazil
341.	Thiago Gehre Galvao, UnB2030 - University of Brasilia	Brazil
342.	Thomas Lagoarde-Segot, Kedge Business School	France
343.	Thomas Marois, UCL Institute for Innovation and Public Purpose	United Kingdom
344.	Yavuz Yasar, University of Denver	United States
345.	Zahra Karimi Moughari, University Of Mazandaran	Iran
346.	Zsuzsa FERGE, University Eotvos, Budapest	Hungary