



European Bank
for Reconstruction and Development

Implementation of the EBRD's Access to Information Policy: 2022 report

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Foreword

I am proud to present the 2022 edition of the European Bank for Reconstruction and Development's (EBRD) report on the implementation of its Access to Information Policy. It summarises the Bank's performance with regard to its commitments to transparency, accountability and information disclosure and informs stakeholders about the activities and initiatives that staff in the Office of the Secretary General (OSG), working in close collaboration with departments across the Bank, have undertaken to maintain and improve practices in this regard.

For the EBRD, as for the rest of the world, attention in 2022 was focused on responding to Russia's war on Ukraine and the ongoing effects of Covid-19. Despite the profound uncertainty and considerable disruption caused by each crisis, the EBRD delivered for its clients – both in terms of record Annual Bank Investment and living up to its commitments on inclusive, environmentally sustainable development, transparency and disclosure.

To support the critical and time-sensitive needs of clients affected by Russia's war on Ukraine, the Bank developed and deployed the Resilience and Livelihoods Framework (RLF), initially concentrating on energy security, municipal and national infrastructure, trade finance and liquidity. Noting the urgency and sensitivity of certain projects prepared under the RLF, the EBRD also established and implemented procedures to ensure appropriate transparency, adhering to its disclosure requirements to the greatest extent possible, while protecting the legitimate security interests of Ukraine and our clients and espousing the need for business agility in response to evolving threats.

Meanwhile, work to mainstream transparency and disclosure across the EBRD's work continued in 2022, from centralising disclosure throughout the project lifecycle to contemplating broad and regular disclosure of each aspect of the Bank's institutional activities. Efforts in relation to this important subject will be maintained throughout 2023 as we embark on a wide-ranging exercise to collect stakeholder views on our implementation of the current transparency framework and what improvements might be made with a view to its revision in 2024. We look forward to reinforcing the EBRD's existing record on transparency in 2023 and well into the future.

Kazuhiko Koguchi

Secretary General, European Bank for Reconstruction and Development

Introduction

The principles of accountability, good governance and responsibility to stakeholders are fundamental to the operations of the European Bank for Reconstruction and Development (EBRD) and are demonstrated in the Bank's commitment to transparency and information disclosure.

The EBRD's Access to Information framework – comprising the [Access to Information Policy](#) (AIP) 2019 and [Directive on Access to Information](#) (Directive) – sets out how the Bank discloses information and consults with its stakeholders to promote awareness and understanding of its activities. The full texts of the AIP and Directive are published on the EBRD's [website](#).

The AIP requires the EBRD Secretary General to report to the Board annually on its implementation and the report be published on the Bank's website. The *Implementation of the EBRD's Access to Information Policy: 2022 report* outlines the Bank's work to mainstream transparency and to implement the Access to Information framework between 1 January and 31 December 2021 (the reporting period).

Although the AIP allows for the review and amendment of the Directive from time to time, the Bank has reviewed its operation during the reporting period and does not propose any changes at this time. Management plans to revise the Directive with effect from 2025, following a review of the AIP in 2023 and 2024 (described further on page 18).

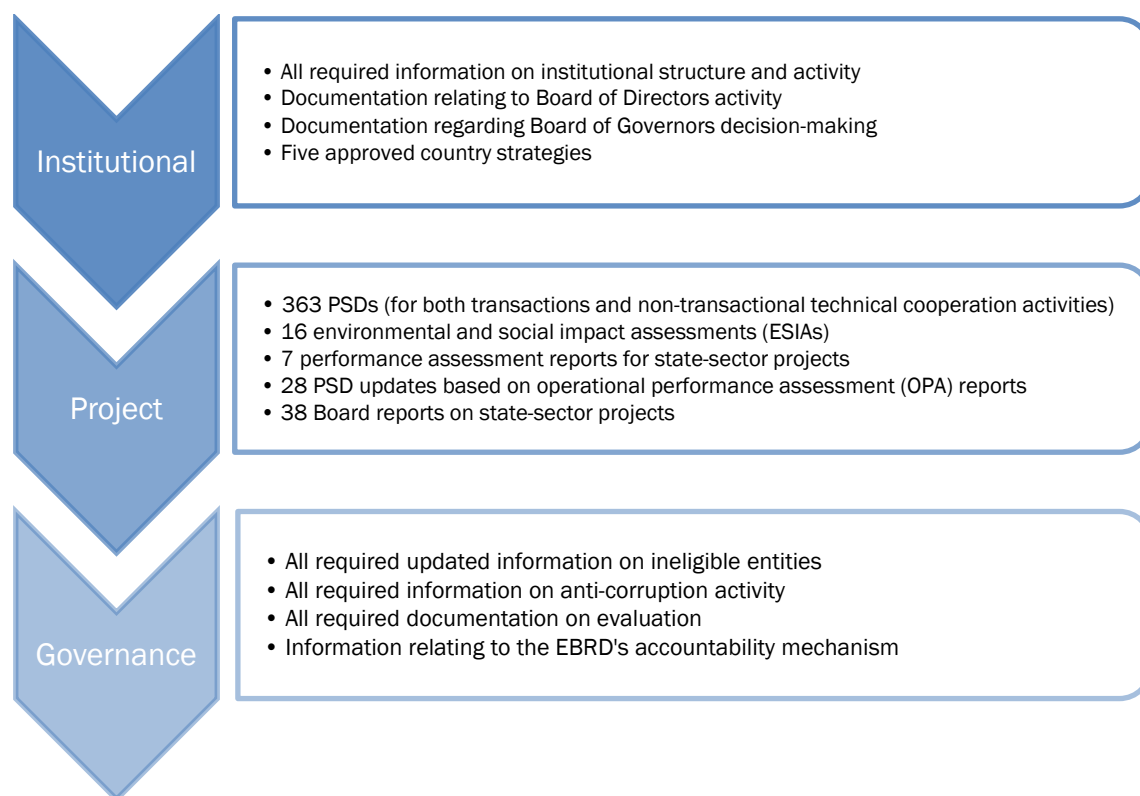
Highlights of 2022

- **Effective implementation of the AIP and Directive** – The EBRD continued to make efforts to ensure the effective and appropriate application of its transparency framework, including ensuring appropriate disclosure arrangements for newly designed and innovative Bank products, such as those to address the unprecedented disruptions to food and energy supply chains experienced throughout the EBRD's regions in 2022.
- **Prompt and effective crisis response** – The Bank demonstrated its ability to respond nimbly and effectively to profound uncertainty and catastrophe yet again in 2022. In the face of the largest armed conflict in Europe since 1945, the Bank mobilised to mitigate the unimaginable disruptions and devastation wrought by war. The Resilience and Livelihoods Framework (RLF) was created to protect the real economy in the Bank's most affected countries of operations. To support its clients, including, where necessary, the provision of emergency assistance, the EBRD President approved a deviation from ordinary project information disclosure timelines, to be considered on a case-by-case basis. Details of this deviation are explained on page 8.
- **Adherence to requirements of the AIP and Directive** – The EBRD complied with all the requirements of the AIP and Directive during the reporting period. The dedicated Access to Information function of OSG continued its efforts to embed consistent transparency practices throughout the Bank.
- **Ongoing improvements in routine disclosure practices** – In 2022, a civil society organisation focused on transparency, [Publish What You Fund \(PWYF\)](#), awarded the Bank a "good" rating. Nevertheless, the EBRD continued its Bank-wide efforts to improve its stakeholder engagement and information disclosure practices. The Bank maintained its monthly activity reporting to the International Aid Transparency Initiative (IATI) standard. Since September 2021, it has published its sovereign and non-sovereign portfolio information separately, in line with emerging best practice. During the reporting period, the Bank also maintained its discussions with PWYF on issues including the development of PWYF's Development Finance Institution (DFI) Transparency Tool, which ranked the EBRD as one of the five most transparent DFIs for both its private-sector and state-sector portfolios in early 2023. The EBRD will continue to work with PWYF in 2023 to explore potential improvements both to its IATI reporting, such as the publication of additional data points on procurement, audits, results and evaluations, and to components of the DFI Transparency Tool.
- **Mainstreaming and upskilling** – Throughout 2022, the EBRD continued to strengthen its transparency and enhance stakeholder engagement practices. The Access to Information function delivered specific training to approximately 150 members of staff on components of their transparency obligations, further streamlined and simplified proactive project disclosures, and fostered a culture of timely and meaningful information disclosure across the EBRD.

Implementation of the AIP – a snapshot

Section IV of the Directive outlines the documentation and information to be disclosed by the EBRD as a matter of course. During the reporting period, the Bank proactively disclosed information as detailed in Chart 1 below. Additional details appear throughout this report.

Chart 1. Documentation disclosed

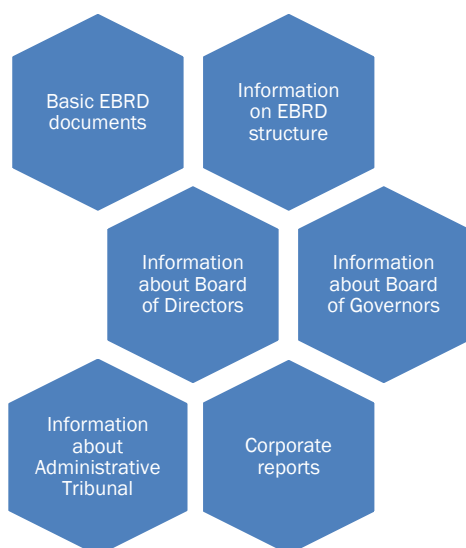


Proactive disclosure

Section IV of the Directive on Access to Information provides for proactive disclosure of particular types of information by the EBRD. Details of this disclosure during the reporting period are set out in this section.

Institutional information

During the reporting period, the Bank disclosed a broad range of institutional information on its website.



Institutional information disclosed by the Bank during 2022 included:

- [a schedule](#) of Board discussions, including – at any point in the year – agenda items for the two forthcoming Board meetings
- [minutes](#) of the 31 Board meetings held in 2022, posted online after approval by the Board of Directors
- [membership](#) of the Board of Directors and its constituent committees
- an EBRD [organisational chart](#), updated regularly to reflect key changes in staff
- copies of the Bank's [Strategic and Capital Framework](#), and annual [Strategy Implementation Plan](#)
- salaries of senior management and Directors (in the [Financial Report 2021](#))
- information on the work of the EBRD [Administrative Tribunal](#) (posted online and kept updated, as required).

Policies and strategies

During the reporting period, seven draft country strategies (and translations of them into relevant official national languages) were posted for comment on the EBRD's website prior to Board approval, as required by the AIP. Once approved by the Board of Directors, final versions of five of the country strategies were disclosed on the Bank's website during the reporting period, supplemented by summaries of associated public comments. Table 1 sets out details of the dates of their public consultation, approval and publication.

Table 1. Country strategies approved by the Board of Directors in 2022

Country	Dates of public consultation	Board approval date	Publication date (in English and local language)
Kosovo	11 November to 26 December 2021	26 January 2022	26 January 2022 8 February 2022
Egypt	17 November 2021 to 1 January 2022	9 February 2022	10 February 2022 8 March 2022
Bosnia and Herzegovina	27 January to 13 March 2022	6 April 2022	7 April 2022
Kazakhstan	23 December 2021 to 27 February 2022	22 June 2022	27 June 2022
Mongolia	29 July to 1 September 2022	19 October 2022	21 October 2022

Two draft country strategies posted for comment in the reporting period are scheduled for approval by the Board of Directors in 2023, after which they will be disclosed in English and relevant local languages. Table 2 sets out the dates of these public consultations.

Table 2. Country strategy consultations commenced in 2022

Country	Dates of public consultation
Croatia	28 November 2022 to 12 January 2023
Moldova	16 December 2022 to 30 January 2023

Project information

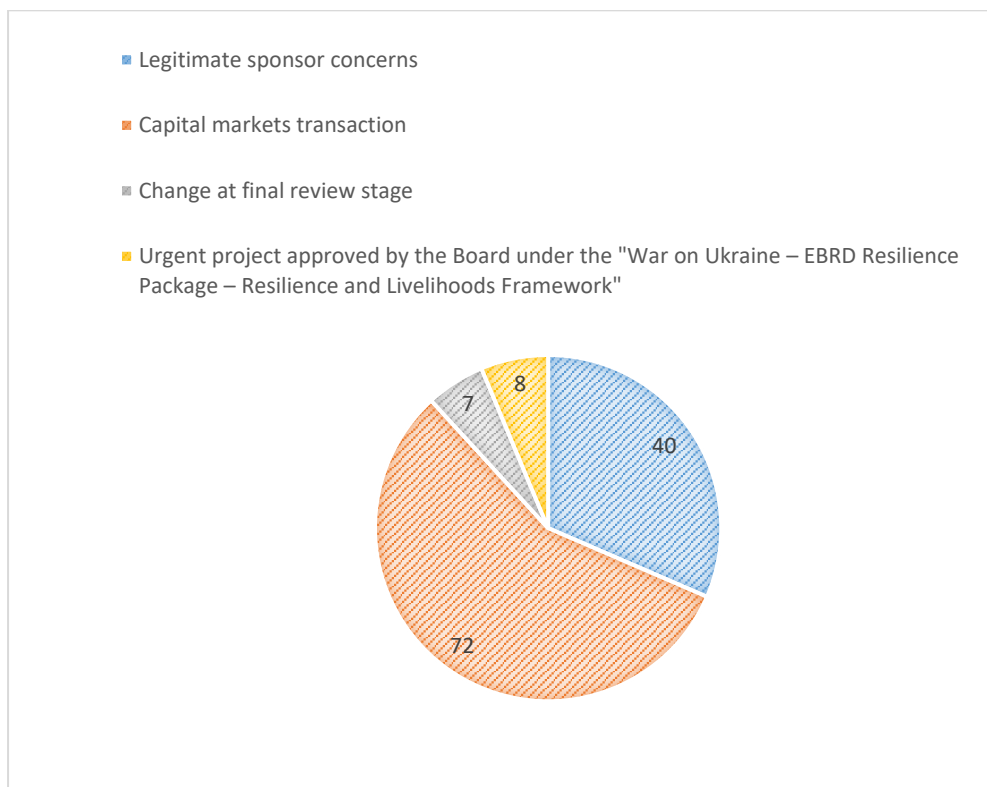
The EBRD's key tool for project disclosures is the project summary document (PSD). Throughout the project lifecycle (from project design to implementation and maturity), the Bank discloses a PSD and other materials in relation to an individual project on www.ebrd.com. These are intended to ensure that stakeholders are informed about EBRD operations in a timely manner. During the reporting period, the Bank's PSD pages received a total of 415,843 page views.

Project summary documents

In 2022, PSDs for 340 projects were disclosed on the Bank's website. Of these, 66 related to projects with state-sector clients and 274 related to projects with private-sector clients.

EBRD management granted deferrals in relation to the publication of 131 PSDs for projects approved during the reporting period, in each case authorised in accordance with the terms of the Access to Information framework. Since these deferrals were granted, three projects have been cancelled (negating the need for a PSD), several have been delayed or deferred due to changes in economic conditions, and PSDs have been published in relation to 80. PSDs for the remaining projects will be published when the triggers for their release have been met.

Chart 3. PSDs deferred in 2022



Note: The stated legitimate reasons for deferral exceed the number of actual deferrals because, in some cases, there was more than one reason for the request.

As of the date of this report, local-language translations had been provided for all of the PSDs published during the reporting period.

Response to Russia's invasion of Ukraine

EBRD activities during the reporting period were dominated by the Russian invasion of Ukraine, a human catastrophe that destabilised communities and economies across Europe and which has had profound effects both on Ukraine and on neighbouring countries.

To preserve livelihoods and support the real economy, the EBRD worked to provide rapid finance, advisory and policy support to help businesses and governments in Ukraine and affected countries combat the profound strategic and operational difficulties of the war. On 6 April 2022, the Board of Directors approved the RLF – a €2 billion programme focused on those sectors most affected by the crisis, initially concentrating on energy security, municipal and national infrastructure, trade finance and liquidity. These measures were designed to meet the immediate needs of Bank clients and their communities.

Implementation of the RLF included approval by the EBRD President of a deviation from the ordinary timelines for disclosure of project-specific information for those crisis-response projects which, due to their urgency, require a highly expedited project preparation and approval process, (excluding category A projects).¹ This deviation, approved in accordance with Section IV, paragraph 1.4.2 of the Directive, permitted deferred disclosure of PSDs for projects approved under the RLF on a case-by-case basis. To maintain the Bank's high standards of accountability and transparency, PSDs for those projects for which deferred disclosure was permitted were required to be disclosed as soon as practicable and, in any event, no later than (i) for state-sector projects, the date of submission of documentation for approval and (ii) for private-sector projects, no later than the date of approval. Between approval of the RLF on 6 April 2022 and 31 December 2022, seven of the 40 projects prepared under the framework made use of this disclosure deferral deviation.

¹ Category A projects are those that are likely to have significant environmental and/or social impacts and require a more formalised process of assessment than other projects. These are listed in Appendix 2 of the EBRD's [Environmental and Social Policy 2019](#).

To ensure consolidated and meaningful disclosure, the Bank also established a centralised location for information on the [Bank's activities in response to the war on Ukraine](#), including information on donor support and activities coordinated with international partners.

PSDs for non-transactional technical cooperation projects over €300,000

As required by section IV, paragraph 1.4.3 of the Directive, 23 PSDs for non-transactional technical cooperation projects of more than €300,000 were published on the Bank's website in 2022.

Cancelled or inactive projects

Section IV, paragraph 1.4.10 of the Directive provides for the removal from the Bank's website of projects that have been cancelled or inactive for more than 12 months. During the reporting period, no PSDs were removed from the Bank's website for either reason.

PSD updates: operational performance assessment

The Bank updates PSDs to incorporate evaluative information about those of its projects that have reached operational maturity and were the subject of an operational performance assessment (OPA) report.

Summaries of 28 OPAs prepared during the reporting period were disclosed on the EBRD's website.²

Board reports on state-sector projects

The EBRD proactively discloses the Board reports prepared in relation to state-sector projects, subject to the removal of any confidential information. The Bank has disclosed Board reports for all 38 state-sector projects approved by the Board of Directors during the reporting period.

Except on four occasions – where disclosure was deferred in accordance with the AIP (that is, where deferral was aligned with the deferral of disclosure of a project's PSD) – these Board reports are disclosed within 30 days of Board approval of the project. On each occasion, the Board report was disclosed on the date of publication of the PSD.

Project assessment reports on state-sector projects

The EBRD proactively discloses the non-confidential information set out in OPA reports prepared for state-sector projects.

During the reporting period, the Bank disclosed performance assessment reports for seven state-sector projects, each of which was disclosed on the Bank's website within 60 days of completion of the relevant OPA, as required by the AIP.

Project-related environmental information

The EBRD disclosed ESIA for 16 Category A projects in 2022. In each case, the Bank made a full ESIA disclosure package available online – both on the Bank's website and on the client's website – in English and in relevant local languages.

Of the 16 ESIA disclosed during the reporting period, 14 were linked to the disclosed PSD for the project. Where these materials related to direct investments by the Bank, all were disclosed in accordance with the timelines required by the AIP (60 days prior to Board approval for private-sector projects, 120 days prior to Board approval for state-sector projects). One ESIA disclosed during the reporting period related to a potential EBRD project for which Board consideration dates had not yet been set. Another ESIA was

². OPAs are conducted for projects approved by the Board of Directors and those approved by management. Prior to 2020, PSDs were not generally disclosed for projects approved by management. Consequently, summaries of OPAs carried out for these projects have not been disclosed on the EBRD's website.

disclosed by both the EBRD and its client without specific reference to details of the Bank's proposed transaction, to best comply with applicable stock exchange regulations.³ Table 3 sets out details of these disclosures.

Table 3. Summary of Category A disclosure or Board review in 2022

Country	Project name	Public/private	ESIA disclosure date	Board date	Days public	Languages
North Macedonia	TEN-T Skopje-Kosovo Border Motorway	Public	15 February 2022	22 June 2022	127	English/Macedonian
Uzbekistan	Zarafshon Wind	Private	4 March 2022	20 July 2022	138	English/Russian/Uzbek
Uzbekistan	Zarafshon Wind (VAT)	Private	4 March 2022	20 July 2022	138	English/Russian/Uzbek
Uzbekistan	Sarimay-Djankeldy Transmission	Public	17 March 2022	7 September 2022	174	English/Russian
Kyrgyz Republic	Tyup-Karakol Road	Public	12 May 2022	15 December 2022	217	English/Russian
Azerbaijan	Azerbaijan Absheron-Khizi WPP	Private	20 May 2022	21 September 2022	124	Azerbaijani/English
Uzbekistan	Uzbekistan Dzhankeldy WPP	Private	20 May 2022	19 October 2022	152	English/Russian/Uzbek
Uzbekistan	Uzbekistan: Bash WPP	Private	20 May 2022	19 October 2022	152	English/Russian/Uzbek
Poland	DCT's Terminal 3 expansion Project	Private	15 July 2022	21 September 2022	68	English/Polish
Greece	Kassandra Mines Project	Private	15 July 2022	30 November 2022	138	English/Greek
Kazakhstan	Almaty CHP Coal Phase Out Project	Public	15 July 2022	16 November 2022	124	English/Russian
Serbia	High Speed Rail Belgrade to Niš	Public	28 July 2022	30 November 2022	125	English/Serbian
Albania	Rehabilitation of Vore-Hani i Hotit Railway Line	Public	29 July 2022	30 November 2022	124	Albanian/English
Albania	Votia: Karavasta PV	Private	31 August 2022	2 November 2022	63	Albanian/English
North Macedonia	Regional Gasification Project	Public	11 October 2022	n/a ⁴	n/a	English/Macedonian
Türkiye	Antalya Airport	Private	11 November 2022	11 January 2023	61	English/Turkish

³ In relation to this project, the client undertook substantial public outreach during the ESIA disclosure period to ensure disclosure of sufficient information regarding the project and meaningful consultation. Information was shared with people and groups potentially impacted by the project, both online and locally in communities near the proposed project. The Bank disclosed the ESIA on its website in line with the Directive on Access to Information in July 2022.

⁴ As of 28 February 2023 (140 days following initial disclosure of the ESIA), no date had been set for approval of this project by the Board of Directors.

In addition, PSDs for 150 Category B projects were published during the reporting period, each of which set out enhanced environmental and social information. Nine PSDs for Category B projects had non-technical summaries attached or linked to on the relevant client's webpage.

To guide Bank clients in their implementation of Performance Requirements (PRs) for specific projects, the Bank published additional materials, including the following guidance and good practice notes:

- a guidance note on biodiversity conservation and the sustainable management of living natural resources under EBRD Performance Requirement 6
- a study on pandemic response strategies: lessons from Asia-Pacific and European economies for healthcare sectors in the EBRD regions
- a research study on supporting EBRD clients in addressing gender-based violence issues in conflict-affected Ukraine.

Project procurement

In addition to the provision of funding, the EBRD's Procurement Policy and Advisory Department (PPAD) supports the Bank's operations and activities in a number of ways. It oversees procurement carried out by the Bank's clients, is involved in policy dialogue on procurement standards with those countries in which the EBRD operates and undertakes outreach to the business community.

The Bank regularly discloses information on procurement activities carried out by Bank clients for Bank-funded projects.

The EBRD is the first international financial institution to require its clients to procure goods, works and consultancy services using an electronic procurement platform (EBRD Client e-Procurement Portal, ECEPP) established by the Bank and serviced by an outside provider. The ECEPP allows the Bank's clients to run the entire procurement process on the platform following the Bank's Procurement Policy and permits the Bank to monitor each of these processes to ensure compliance with its rules. Use of the ECEPP platform also enhances the transparency and integrity of the procurement process by permitting external oversight by all interested stakeholders.

In May 2022, the Board of Directors approved a revision of the rules applicable to project-related procurement processes – the EBRD Procurement Policies and Rules (PPR).⁵ The Bank also outlined all of PPAD's activities and provided information on all 383 public-sector contracts, valued at €2.558 billion, placed by Bank clients in 2021 (including details of those firms and individuals that submitted tenders) in its annual report ([Annual review of procurement activities under the Procurement Policies and Rules](#)).

Institutional environmental, social and governance information

During the reporting period, the Bank published its [Sustainability Report 2021](#), outlining portfolio information on the environmental and social issues raised by projects approved during the 2021 calendar year.

In addition to environmental and social issues raised by EBRD projects during the reporting period, the Bank participated in a number of international initiatives on the mainstreaming of environmental, social and governance (ESG) matters. For example, the Bank provided its stakeholders with a comprehensive overview of its approach to ESG issues by publishing a report in line with the [Global Reporting Initiative \(GRI\) standards](#) and submitted its third annual report on the voluntary reporting framework of the [Task Force on Climate-Related Financial Disclosures](#).

The Bank also published additional information on [ESG](#) issues, including information on:

- the EBRD's carbon footprint
- the EBRD's policy on diversity and inclusion, and associated reporting
- EBRD staff regulations

⁵ These can be found on the Bank's [website](#).

- the EBRD's procedures for dealing with harassment or improper behaviour in the workplace
- the EBRD's procedures for reporting and investigating suspected misconduct
- the operation of the EBRD Staff Council, including its constitution, bylaws and working arrangements.

Minutes of the meetings of the Bank's Environmental and Social Advisory Council are disclosed on the EBRD's [website](#). The Council is next scheduled to meet on 28 March 2023.

Stakeholder engagement

Relations with civil society

Throughout the reporting period, the Bank maintained its regular strategic dialogue with representatives of civil society in a number of ways. The EBRD Civil Society Engagement (CSE) team organised six country, sector and thematic consultations, 12 Presidential civil society organisation (CSO) meetings and four sessions to permit direct discussion between Board officials and civil society stakeholders (including three Board consultation visits), through which the CSE team reached out to more than 600 CSOs.

The CSE team also delivered a hybrid programme of events for civil society during the EBRD Annual Meeting and Business Forum in Marrakech, which attracted around 200 civil society representatives. In addition to sessions between CSO representatives, the Board of Directors and the President, the CSE team also delivered a multi-stakeholder panel focusing on building partnerships between civil society, governments and the private sector, a CSO-led panel focusing on civil society in sustainable energy transitions, and sessions on both the Bank's Independent Project Accountability Mechanism (IPAM) and Evaluation Department.

Between meetings with CSO representatives, the CSE team updated more than 2,500 CSO representatives about recent EBRD developments and upcoming consultation events through its newsletter and database. Contacts were also advised of upcoming consultations on EBRD policies and strategies through dedicated civil society webpages, targeted email notifications and alerts, and social media platforms, such as Facebook, Twitter and LinkedIn.

In addition to its engagement and information-sharing work, the CSE team continued to deliver on 14 technical cooperation projects under the Civil Society Capacity Enhancement Framework (CSCEF) during the reporting period. These projects, worth a combined €4.5 million or so, allow the Bank to establish partnerships and provide support to a wide range of civil society actors and support the CSCEF's focus areas of sustainable energy and resources, gender and economic inclusion, good governance and digital transition.

To support the Bank's Strategic and Capital Framework priority of digital transformation, the CSE team also completed a pilot project under the Digital Transformation of Civil Society Programme in Türkiye in early 2022, strengthening the digital capacity of five local environmental CSOs by assessing their needs and providing them with relevant seed funding and training. Participating organisations saw an increase in their digital resilience and took their first steps towards digital transformation. Phase 2 of the programme was approved in late 2022 and is expected to commence in 2023, providing similar capacity-building to a larger number of CSOs.

Following Russia's invasion of Ukraine in February 2022, the CSE team's focus shifted to supporting its civil society partners in Ukraine and affected countries. Under the RLF, the Bank started to work with various CSOs to support coordination efforts and target crisis-affected areas. In close collaboration with both governments and the private sector, the Bank launched several projects to support the economic and social inclusion of refugees in affected countries. Specifically, the Bank facilitated the provision of critical services, such as opening bank accounts, legal support, therapy, administrative support and childcare provision. The Bank also assisted with access to employment opportunities, including through internships and training programmes. Most critically, the CSE team supported efforts to enable CSOs in affected countries to work with the Bank and its clients to address the impacts of the war on communities in those economies where the Bank operates. This will prove invaluable once conditions allow reconstruction work to begin: then, the Bank expects CSOs to continue to play an important role in overseeing transparency and the efficient use of resources allocated to those efforts, and in monitoring adherence to good corporate governance practices.

In 2022, the CSE team also started to revise the EBRD Civil Society Engagement Roadmap. The team conducted a comprehensive survey to gather feedback from CSO partners on issues such as the Bank's engagement mechanisms, the effectiveness of the previous roadmap and how EBRD investments and policies might be more inclusive. The survey was supplemented by in-depth interviews with internal and external stakeholders to discuss the Bank's civil society engagement practices. This feedback is being incorporated into the EBRD's first strategic approach to civil society engagement.

The EBRD website

It was an extremely busy year for EBRD digital campaigns in 2022. In addition to recurring activity related to the *Transition Report*, EBRD Literature Prize, International Women's Day and EBRD Green Cities, the team also undertook four major campaigns during the reporting period: supporting Ukraine, COP27, the Annual Meeting and the joint MDB/IFI campaign.

In response to this level of engagement, the Bank's social media following experienced record growth: the total number of followers of the main EBRD social media accounts increased 16.9 per cent on the year (following already significant growth of 14.9 per cent in 2021) to reach a follower count of 346,013.

As the Bank focused more on reaching its priority target audiences and developing its social media presence, the EBRD's website, ebrd.com – saw a 9 per cent drop in users. Meanwhile, the Communications Department continued its campaign to optimise the team's email delivery system, supplied by GovDelivery. The Bank also saw a slight decrease in subscribers on GovDelivery during the reporting period, reflecting the removal of 27,946 bots and the acquisition of 26,695 new subscribers. Similarly, the use of the Project Finder tool and individual PSD page views declined during the reporting period (by 15.07 per cent and 13.08 per cent, respectively), though the number of subscribers to notifications of PSD publications increased to 13,586. Overall, EBRD content attracted 1,184,002 organic engagements across all platforms, a 37.6 per cent increase on the year. Details of use of the Bank's website during the reporting period are set out in Table 4.

Table 4. Metrics on use of the Bank's website

	Web traffic	User sessions	Website page views	Website subscribers	PSD page views	Project finder page views	PSD publication subscribers	Email subscriptions ⁶
2021	1,436,326	2,459,622	5,310,078	99,345	470,247	29,474	13,451	1,921,855
2022	1,304,991	2,348,348	5,055,671	98,093	415,843	25,613	13,586	1,923,184
Difference	-9.14%	-4.52%	-4.79%	-1.26%	-13.08%	-15.07%	+0.01%	+0.07%

Accountability and governance information

Compliance information

Ineligible entities – Following the entry into force of the Agreement on Mutual Enforcement of Debarment Decisions between the EBRD, the African Development Bank Group, the Asian Development Bank, the Inter-American Development Bank and the World Bank Group, the EBRD cross-debarred 383 entities or individuals during the reporting period, in line with its obligation to recognise and enforce debarment notices from other parties to that agreement.

Debarment notices – Following proceedings instituted under the Bank's Enforcement Policy and Procedures,⁷ the Bank issued decisions imposing enforcement action against five entities during 2022.

Anti-corruption reports – In 2022, the EBRD Office of the Chief Compliance Officer issued its annual *Integrity and Anti-Corruption Report* on matters arising during the 2021 calendar year, which was published and posted on the Bank's website.

⁶ Note that subscribers can sign up to multiple streams of content by location and sector.

⁷ The Bank's Enforcement Policy and Procedures were most recently amended with effect from 4 October 2017.

Independent Project Accountability Mechanism

In 2022, the Bank's Independent Project Accountability Mechanism (IPAM) continued to manage 13 cases carried over from 2021, two of which were closed during the reporting period. IPAM also received eight new requests for registration, of which three were registered, two are pending and three were not registered, as they did not meet the criteria for registration. By the end of the year, the active case portfolio to be carried over to 2023 included 14 active cases and two pending requests.

In May 2022, IPAM published the IPAM [Annual Report 2021](#).

IPAM's public virtual case registry includes all individual case summaries that provide information on all cases. The case registry also contains a case tracker, with all IPAM case documents disclosed by stage of processing. In 2022, three new case summaries were added to the registry and 17 reports were produced and disclosed.

Table 5. Reports disclosed by IPAM in 2022

Case number	Case name	Documents disclosed
2022/03	Titan 2027 Eurobond (52337 , 48507)	---
2022/02	DFF Adriatic Metals (52342)	---
2022/01	Ulaanbaatar Darkhan Road (50766)	Assessment report (English/Mongolian)
2021/03	Maritsa Mine East (Grant N. 54, 50221 , 48556)	Compliance assessment report (Bulgarian/English)
2021/02	Gradacac Water Supply Project (45810)	Assessment report (Bosnian/English) Problem-solving completion report (Bosnian/English)
2021/01	Belgrade Solid Waste PPP (Request #2) (46758)	---
2020/07	Tumad Gold Mines Development (49041)	Problem-solving completion report (English/Turkish)
2020/06	Corridor Vc in FBH – Part 3 (49058)	---
2020/02	Lydian (Amulsar Gold Mine) - Extension (48579)	---
2020/01	Kvesheti Kobi Road Project (50271)	---
2019/01	Shuakhevi HPP (Request #2) (45335)	Compliance review report (English/Georgian) Requester's comments (English/Georgian) Management action plan (English/Georgian) MAP monitoring plan (English/Georgian)
2018/09	MHP Corporate Support Loan and MHP Biogas (47806 , 49301)	Compliance assessment report (English/Ukrainian)
2018/08	Nenskra HPP (46778)	Monitoring report III (English/Georgian) Monitoring report IV (English/Georgian)
2018/01	Kozloduy International Decommissioning Support Fund	Problem-solving summary (Bulgarian/English/Romanian)
2017/07	Lukhoil Shah Deniz Stage II (46766)	Monitoring report IV (English) Monitoring report V (English)
2017/05	Southeast Europe Equity Fund (34894)	Monitoring report V (English) Monitoring report VI (English)

Evaluation information

During the reporting period, the Evaluation Department (EvD) prepared the evaluation documents shown in Table 6 for disclosure by the Bank:

Table 6. Evaluation documentation disclosed in 2022

Document type	Examples disclosed in 2022
EvD annual reporting	Evaluation Work Programme and Budget 2023-25 Annual Evaluation Review 2022 Annual Evaluation Review 2022 – video
Special and thematic studies and approach papers	Review of Strategy Implementation Plans (2016-21) Sustainable Infrastructure Operations in Advanced Transition Countries EBRD Public Sector Operations: Mobilising Private Sector Participation in Infrastructure Evaluation of EBRD's investments in the West Bank & Gaza Rapid Assessment of the Solidarity Package Cluster Evaluation - Solar Power Operations Evaluation of the Shareholder Special Fund (2016-20) Information Sheet: ETC evaluation Approach Paper: ETC evaluation VCIP information sheet Implementation of Agribusiness Strategy 2019-23 – interim evaluation Implementation of Agribusiness Strategy 2019-23 – Interim evaluation Information sheet Green Cities programme – interim evaluation Green Cities programme – interim evaluation Information sheet
Operational knowledge products	Connecting the dots: Evidence that drives change (new series of knowledge notes): MDBs in Sub-Saharan Africa IFI Operations in Egypt Building back better

Other disclosures

During the reporting period, the EBRD prepared and disclosed a series of its regular targeted reports, including the following:

- a. [Annual Review 2021](#)
- b. [Financial Report 2021](#)
- c. [Sustainability Report 2021](#)
- d. [GRI Report 2021: Sustainability Disclosures](#)
- e. [Transition Report 2022-23 – Business Unusual](#)
- f. [Annual Procurement Review 2021](#)
- g. [Annual Corporate Procurement Review 2021](#)
- h. [Task Force on Climate-Related Financial Disclosures Report 2021](#)
- i. [Access to Information Policy Implementation Report 2021](#).

Reactive disclosure – requests for information

The EBRD receives requests for information through a request form available on each page of the Bank’s website, through various mailboxes and by means of direct requests to staff members.

In an effort to optimise the online request form and increase its effectiveness, in 2022, the Bank created a separate “new business enquiry” form, through which any queries specifically related to funding opportunities can be submitted and responded to by a dedicated team within the Bank.

Reflecting the expanded scope and scale of the EBRD’s activities in recent years, as well as growing interest in these activities by the Bank’s external stakeholders, the number of requests for information received by the Bank increased during the reporting period to a total of 1,476. The EBRD responded to all requests for information in accordance with the timelines set out in the AIP.

Details of the requests for information received by the Bank, noting the subject matter of requests and the location of requesters (where provided), are set out below.

Chart 4. Trends in requests for information

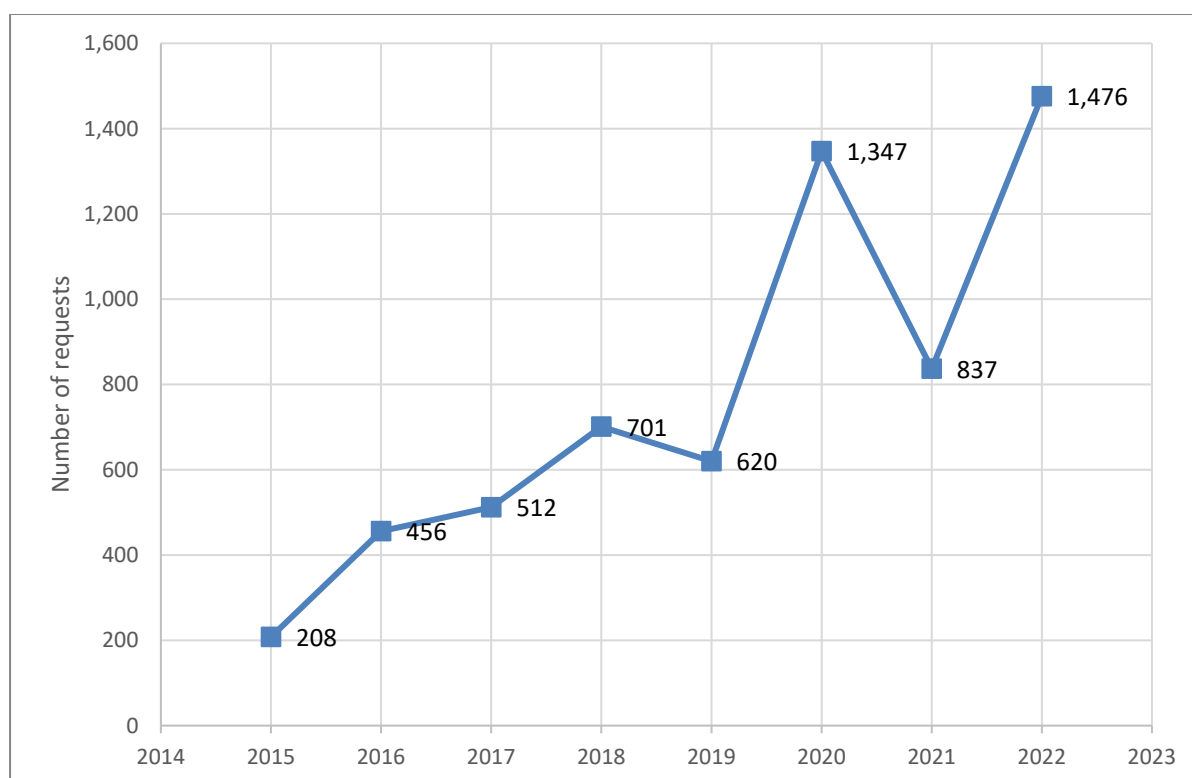


Chart 5. Requests for information by area of interest

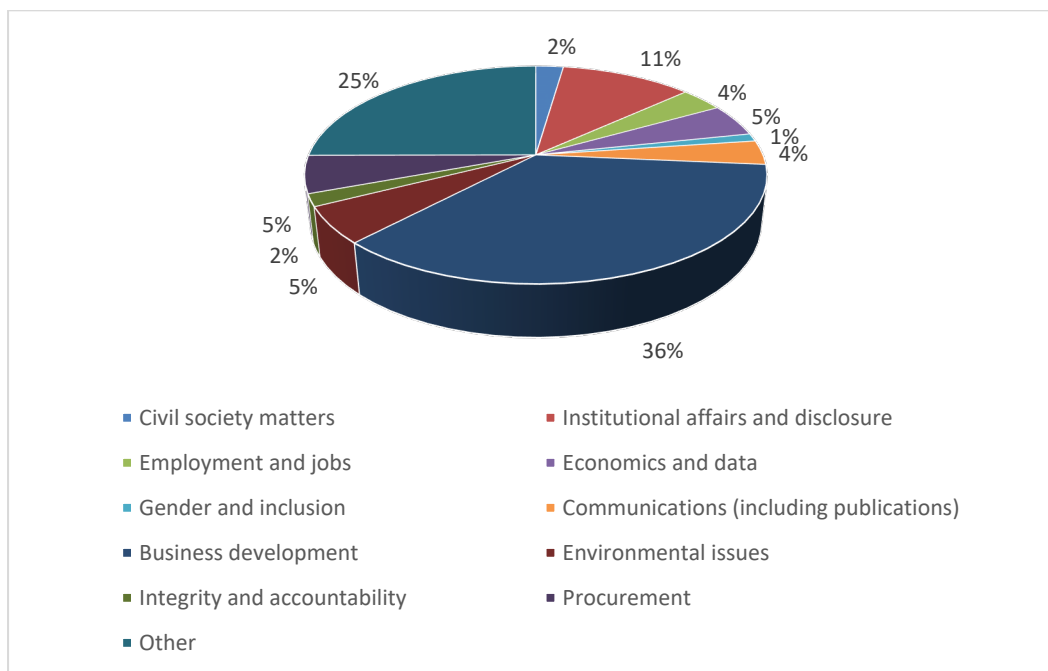
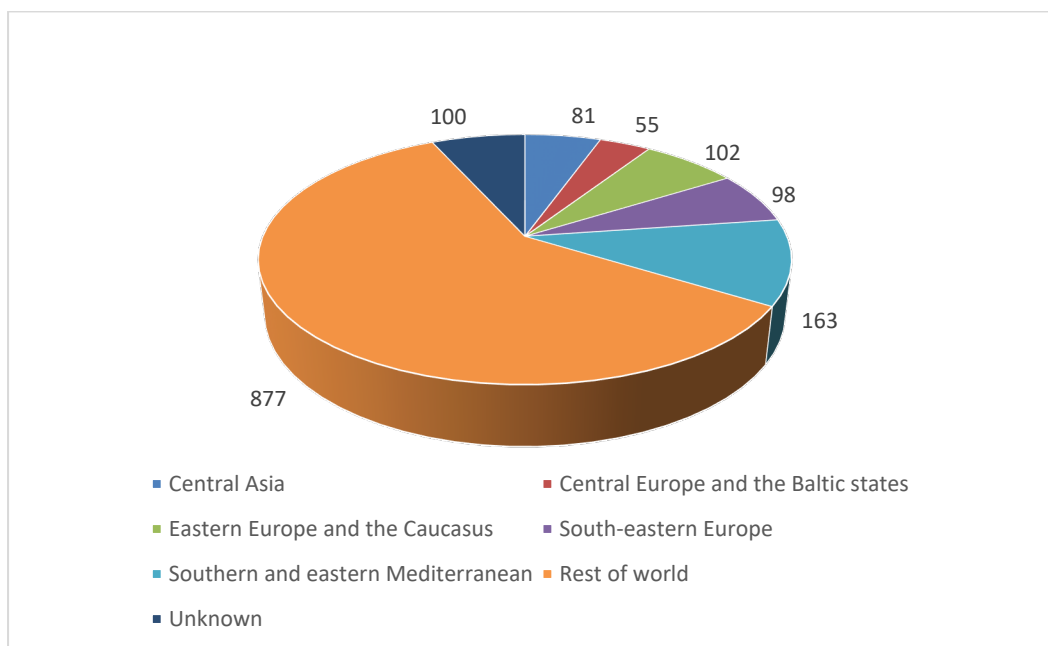


Chart 6. Requests for information by requester location



Moving forward

The EBRD's transparency regime is a cornerstone of its work to promote economically and environmentally sustainable transition and good governance in the economies where it operates. Its continuing evolution is necessary to ensure that the Bank has an effective framework for managing transparency and disclosure issues. As planned since the launch of the AIP in 2019, the EBRD will commence its five-yearly comprehensive review of the AIP in 2023, with the goal of strengthening and enhancing the Bank's disclosure practices in relation to both project and institutional information.

The Bank will consider its experience of implementing the AIP to date and seek input from affected and interested external parties, to best identify those issues and areas where the Bank's stakeholders believe its transparency arrangements can be improved. It is hoped that this process will allow the Bank to gain stakeholder perspectives that will enrich its understanding and enhance the quality of the review process. Details of this engagement will be published on the Bank's website and updated regularly.

Once these initial discussions have been conducted and taking into account international best practice and emerging issues, the EBRD's Access to Information function will develop approaches that are appropriately adapted to the EBRD's business model. Following comprehensive external and internal engagement, in early 2024, a draft revised policy will be shared with external stakeholders for formal consultation, further review and comment.

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Acronyms

Abbreviation	Definition
AIP	Access to Information Policy
CSCEF	Civil Society Capacity Enhancement Framework
CSE team	Civil Society Engagement team
CSO	Civil society organisation
EBRD	European Bank for Reconstruction and Development
ESIA	Environmental and social impact assessment
EvD	Evaluation Department
IATI	International Aid Transparency Initiative
IPAM	Independent Project Accountability Mechanism
OPA	Operational performance assessment
PCM	Project Complaint Mechanism
PSD	Project Summary Document
PWYF	Publish What You Fund

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