



Independent
Project
Accountability
Mechanism

Problem Solving Closure Report

KAZREF II - Shokpar Wind
EBRD Project Number 52946
Case 2024/05

April 2026

The Independent Project Accountability Mechanism (IPAM) is the European Bank for Reconstruction and Development's (EBRD) accountability mechanism. IPAM independently reviews issues raised by individuals or organisations concerning Bank-financed projects that are believed to have caused or be likely to cause harm. The purpose of the mechanism is to facilitate the resolution of social, environmental, and public disclosure issues among project stakeholders; to determine whether the Bank has complied with its Environmental and Social Policy and the project-specific provisions of its Access to Information Policy; and, where applicable, to address any existing noncompliance with these policies, while preventing future non-compliance by the Bank.

For more information about IPAM, contact us or visit www.ebrd.com/project-finance/ipam.html

<p>Contact information</p> <p>The Independent Project Accountability Mechanism (IPAM) European Bank for Reconstruction and Development Five Bank Street London E14 4BG</p> <p>Telephone: +44 (0)20 7338 6000 Email: ipam@ebrd.com</p>	<p>How to submit a complaint to the IPAM</p> <p>Concerns about the environmental and social performance of an EBRD Project can be submitted by email, post, or via the online form at:</p> <p>https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism/submit-a-complaint.html</p>
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Unless otherwise indicated, capitalised terms used in this report are those as set forth in the 2019 Project Accountability Policy.

Acknowledgements

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LIST OF ABBREVIATIONS

Abbreviation	Long Form
Board	the Board of Directors of the European Bank for Reconstruction and Development
Case	the consideration of a Request under the Project Accountability Policy following its registration
CAO	the Chief Accountability Officer of the EBRD, and IPAM Head
Case Registry	the registry of Cases created in accordance with Section III, Paragraph 3.1 of the Project Accountability Policy, which can be found on the IPAM Webpage
Client	Port of Brčko
Compliance	the IPAM function which determines whether EBRD has complied with its Environmental and Social Policy or the Project-specific provisions of its Access to Information Policy in respect of a Project
EBRD (or Bank)	the European Bank for Reconstruction and Development
ESP	the EBRD's Environmental and Social Policy in force at the time of Project approval
IPAM	the Independent Project Accountability Mechanism of the EBRD established as per the 2019 Project Accountability Policy
IPAM Head	the EBRD managing director responsible for the running of IPAM, the implementation of the Project Accountability Policy and for making the decisions that are the responsibility of IPAM under said Policy
NTS	Non-technical Summary
PAP	the 2019 Project Accountability Policy
Parties	the individuals, entities, and/or organisations with a direct interest in a Case. Parties may include (but are not limited to): the Requesters; their Representatives, if any; the relevant Bank department, team, or unit; the Client; and other Project financiers or other entities responsible for the implementation of a Project
Problem Solving	the IPAM function which supports voluntary dispute resolution engagement between Requesters and Clients to resolve the environmental, social, and public disclosure issues raised in a Request, without attributing blame or fault.
PSD	Project Summary Document
President	the President of the EBRD
Request	The communication submitted by a Requester or a representative to IPAM under this Policy

Executive Summary

The [Independent Project Accountability Mechanism \(IPAM\)](#) of the European Bank for Reconstruction and Development (EBRD) formally announces the closure of the Problem Solving initiative of [Case 2024/05](#) concerning [KAZREF II – Shokpar Wind \(EBRD Project Number 52946\)](#). This case was initiated following a Request by the Biodiversity Research and Conservation Center Community Trust from Kazakhstan. The request is raising concerns regarding risk of collusion of threatened species of birds with the wind turbines. Additionally, the Request alleges that the project was inappropriately assigned as category B, and missed to assess potential project impacts on biodiversity.

In accordance with the Project Accountability Policy, IPAM facilitated a Problem Solving initiative involving the Requesters, the Client (Shokpar Wind Power Station LLP) and Bank Management. As part of this process, the Parties agreed on two deliverables intended to explore the potential for resolving the issues raised by the Requesters. While progress was made in relation to these deliverables, persistent challenges related to trust between the Parties limited the scope for constructive dialogue. In this context, the Requester decided to discontinue the Problem Solving process in accordance with section 2.4(c) of the Project Accountability Policy.

This Report will be circulated to the Parties and disclosed in the virtual case file for [Case 2024/05](#) in both English, Kazakh and Russian, following its submission to the Board and the President for information.

1. Background

1.1. The Request¹

On 29 May 2024, IPAM received a [Request](#) from the Biodiversity Research and Conservation Centre Community Trust (the Requesters), in Kazakhstan. Requesters raised concerns regarding risk of collision of threatened species of birds with the wind turbines as part of the EBRD funded [KAZREF II – Shokpar Wind \(52946\)](#). Additionally, the Request alleges that the Project was inappropriately categorized as B and missed to assess potential impacts on biodiversity.

The Requesters informed IPAM that in August 2023 they initiated discussions with the EBRD Client regarding the categorization of the Project and suggested potential mitigation measures to protect birds from wind turbines. In their discussions with the Client, Requesters raised concerns about the Project design for the Shokpar Wind Power Station, emphasizing that it lacks bird detection systems that would automatically stop the operation of wind turbines when birds would approach the turbines. They stressed on the importance of incorporating innovative technology that can prevent bird collisions, which in their view is a critical consideration for environmental protection in wind energy projects. However, Requesters claim that none of their requests regarding mitigation measures have been accepted by the Client, and that they monitored the Project area for a long period of time and found dead birds in the vicinity of the wind turbines. The Request is summarised in the table below which broadly raises the following issues:

Issues raised	Allegations	Related PRs
Impacts on biodiversity	<ul style="list-style-type: none"> Project design lacks bird detection system capable of automatically stopping turbines to prevent bird collisions. Lack of adequate measures has resulted in bird fatalities in the vicinity of wind turbines. 	PR 1 PR 6
Project categorization	<ul style="list-style-type: none"> The Project was inappropriately categorized as B, leading to insufficient assessments of impacts on biodiversity. 	PR 1

1.2. The Project²

The [KAZREF II – Shokpar Wind \(52946\)](#) is a senior loan of up to USD 50 million to Shokpar Wind Power Station LLP for the development, construction, and operation of a wind power plant with an installed capacity of 100MW located in Sarysu district of Zhambyl region. The Project will support Kazakhstan in its objective to increase the share of renewable energy in the energy mix, contribute to reducing Kazakhstan's carbon intensity, and address the country's increasing electricity demand. The Project has been categorized as B under 2019 Environmental and Social Policy, and its current status is signed.

According to the [Project Summary Document](#), the Shokpar WPP site is not located in environmentally and/or socially sensitive areas, and there are no protected or designated nature reserves within a 30-km radius of the Project. The Project environmental and social due diligence included detailed review of the potential impacts on avifauna and need for mitigation measures based on a bird collision risk assessment, undertaken in consultations with international bird experts. Biodiversity baseline surveys were conducted within the 1500 ha site allocated for the WPP and within a 2km buffer around the site for some ornithology receptors and included information on all species present at the site, including red lists species. Further habitat survey of the Shokpar WPP using the relevant EUNIS classifications follow to be undertaken including Critical Habitat Assessment. A project Biodiversity Management Plan will be

¹ The Request is available in the web case summary at [Case 2024/05](#)

² The information is sourced from the [Project Summary Document](#)

produced outlining all the impact mitigation, management, and post construction monitoring protocols at Shokpar WPP facility, to benefit the species' conservation and to demonstrate no net loss for the species concerned, through minimisation of habitat fragmentation, creation of biological corridors, restoration of habitats during operations and/or after operations and implementation of biodiversity offsets.

Figure 1 – General Location of the Project, Southern Kazakhstan



Figure 2 - Layout of the 100MW Shokpar WPP

1.3. Processing to date

The Request was originally submitted to the accountability mechanism of the Asian Infrastructure and Investment Bank (AIIB) on 13 May 2024 which was forwarded to IPAM on 29 May 2024 under the mutual reliance agreement between EBRD and AIIB. On 17 July 2024 IPAM temporarily suspended the registration of the Request to allow EBRD management and the Client an opportunity to engage with Requesters to try and address their concerns. During the suspension period, IPAM monitored the status of Parties' engagement and decided to register the Request as the issues raised haven't been resolved.

The Request was registered by IPAM on 22 October 2024 as [Case 2024/05](#) as it met the criteria for Registration established in Section 2.2 (b) of the PAP, and none of the exclusions set in Section 2.2.(c) of the PAP applied.

Based on the outcomes of the virtual joint meeting of Parties that IPAM facilitated on 30 January 2025, Parties have expressed interest in continuing their engagement to work together towards resolving the concerns raised with IPAM. During assessment the Parties agreed on two key deliverables and milestones to guide the Problem Solving process. The Case proceeded to the Problem Solving function in February 2025.

The Client committed to run independent assessments on bird mortality as well as general migration monitoring studies. The first of these studies was conducted in spring 2025. A second mortality study and general migration monitoring report was conducted in Autumn 2025. The migration monitoring reports were conducted as an action in relation to the Problem Solving process.

In January 2026, the Client shared four reports with IPAM and Bank Management. In light of the existing strained relationship between the Client and the Requesters, the Client did not share the full versions of the reports with the Requesters and instead provided a summary of the key findings.

On their part, the Requesters indicated that they had not received the full versions of the reports. They also expressed reservations regarding the findings that were shared, referring to information gathered through their own monitoring activities in the region, which they indicated was inconsistent with the summaries provided to them.

IPAM conducted a mission in February 2026, during which the team met separately with the Client and the Requesters. The mission confirmed that challenges related to the level of trust between the Parties persist and continue to constrain constructive engagement.

In its meeting with the Requesters, they conveyed uncertainty regarding the continuation of the Problem Solving process and expressed an interest in exploring IPAM's Compliance function. In the meeting with the Client, the Client indicated that, while open to constructive dialogue, it had not formally committed to the Problem Solving process, though it remained willing to continue engaging with a view to resolving the issues.

In April 2026, the Requesters confirmed their decision to discontinue the Problem Solving process in line with section 2.4(c) of the [Project Accountability Policy](#). The requested that the case be transferred to IPAM's Compliance function.

2. Conclusion and Next Steps

While the Parties initially engaged in the Problem Solving process with a view to addressing the issues raised, persistent challenges in trust and engagement ultimately limited the feasibility of achieving a mutually acceptable resolution. In line with the Project Accountability Policy, and at the Requesters' request, the case will therefore proceed to IPAM's Compliance Assessment in accordance with paragraph 2.6 of the Project Accountability Policy.

As per the 2019 Project Accountability Policy, this Report will be circulated to the Parties and disclosed in the virtual case file for [Case 2024/05](#) in both English Kazakh and Russian, following its submission to the Board and the President for information. Upon disclosure, IPAM will consider the Problem Solving process concluded and will transfer the case to Compliance Assessment.