

EBRD IPAM Request

<https://www.ebrd.com/home/forms/ipam-english.html>

1. Who is submitting this Request? Please provide your name(s) or the name of your organisation *

Note: Please, read

<https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism/problem-solving.html>

Parties to the Problem Solving: 1) Requesters / complainants: the individuals, entities and organisations with a direct interest in a case. 2) The Client / Borrower: probably the City of Bishkek and the Bishkek public transport company (although the loan is sovereign and on-lent to these recipients).

The list of Requesters (complainants) will be confidential and will be provided to IPAM as an annex to the Request (complaint).

1.1. Bishkek citizens and organisations

#BishkekSmog

[REDACTED]

1.2. International supporting organisations

[REDACTED]

2. How did you hear about IPAM:

EBRD website and EBRD annual meetings and civil society forum.

3. IPAM is committed to protecting your identity if you fear reprisals. Do you want your name(s) (or the name of your organisation) to be kept confidential throughout this process?

Note: IPAM will share the concerns raised in your request with Bank staff and the Client, but your name and other details that would identify you will not be shared. *

Yes, please. We kindly ask that the personal and organisations' names are kept confidential. If a problem solving process is initiated, then requesters will select representatives to take part in it. If problem solving is not possible and the request goes to compliance review, then we ask for the full confidentiality of identities of all signed individuals, as well as the names of the organisations.

4. Do you fear risk of retaliation for sharing your concerns with IPAM? *

Yes. we do.

The space for independent media and civil society in Kyrgyzstan has been shrinking, especially after the adoption of the law on Foreign Agents on April 2, 2024. Please, see the most recent

updates, to understand the deteriorating context with regards to freedoms of expression and peaceful assembly:

28 May 2025: This update covers the protection of the freedoms of expression, association and peaceful assembly in Kyrgyzstan from October 2024 to May 2025. It has been prepared by International Partnership for Human Rights (IPHR) based on monitoring conducted together with local partners.

3 June 2025: This is a call of Civil Rights Defenders and other organisations, who have become deeply alarmed by the renewed crackdown on Kloop, a leading independent Kyrgyzstani media platform known for investigating and reporting on corruption, abuse of power, and human rights violations.

27 June 2025: Human Rights Watch reacted to the passing of two draft laws that threaten to significantly weaken media freedom and protection against torture in the country. The draft laws effectively dismantles the independent National Center for the Prevention of Torture and grants authorities wide powers to deny media outlets registration, obstruct their work, and close them down without judicial oversight.

5. Country *

Kyrgyz Republic

6. Please provide your contact information

- a. Telephone number: [REDACTED]
- b. Mobile number: [REDACTED]
- c. Email address: [REDACTED]
- d. Mailing address: [REDACTED]
- e. Fax number

How can we best contact you?*

[REDACTED]

7. EBRD Project(s) that raises concerns. If you don't know the Project name, you can include details like the name of the company in charge of the Project, its location, or the activities it is involved in that are affecting you. *

7.1. Bishkek Public Transport Project: #41492, Approval date - 11 Oct 2011, Status - Complete (URL: <https://www.ebrd.com/home/work-with-us/projects/psd/41492.html#customtab-ed31f2005f-item-703835a30d-tab>)

Project cost: US\$ 10 million loan to the Kyrgyz Republic, to be on-lent to the City of Bishkek for the benefit of the municipal trolleybus company, and a further US\$ 5.5 million grant co-financing from an international donor.

The project financed: (i) purchase of **79 new trolleybuses** and (ii) a partial rehabilitation of the related infrastructure. In addition, the project will support the introduction of e-ticketing in the municipally operated public transport sector in the City of Bishkek.

Technical Cooperation components:

Pre-signing: Technical Due Diligence - Including environmental and social due diligence. (US\$ 275,000 funded by the EBRD's Shareholders' Special Fund) and IFRS Audit of the municipal bus and trolleybus companies (US\$ 34,240 funded by the Bank).

Post-signing: Engineering Services, Implementation and Procurement Support for the Project Implementer - Support to the BTC for engineering design, tender evaluation, contract award and administration, financial control, project management, and reporting services (US\$ 300,000 to be funded by donor funds). Support for design and implementation of a new e-ticketing system in the City (US\$ 450,000 to be funded by donor funds).

7.2. Bishkek Public Transport Project Extension: #47624, Approval date 02 Sep 2015, Status - Complete

(URL: <https://www.ebrd.com/home/work-with-us/projects/psd/47624.html#customtab-a52da00983-item-97c8505659-tab>)

Project cost: EUR 8.4 million, including a EUR 5 million sovereign loan and related technical cooperation funds.

To finance: finance the procurement of further **49 new trolleybuses** to partially replace the oldest part of and increase the size of the operational trolleybus fleet to improve the efficiency and quality of public transport services.

In addition, a Public Transport Development Strategy (focused on enhanced regulatory framework) will be prepared to support the implementation of the new urban transport master plan in the City.

Post-signing Technical Cooperation components:

Project Implementation Support for the Company - tender preparation, evaluation, contract award and supervision. Proposed to be financed by an international donor, the ETC Fund or EBRD Shareholder Special Fund;

Public Transport Development Strategy for the City to include:

- (i) review of City's strategic planning documents and Urban Transport Master Plan;
- (ii) development of new public transport route network;
- (iii) preparation of routes tendering, private operators contracting strategy (for bus sector);
- (iv) drafting of full tender documentation for routes tendering, including Public Service Contracts ("PSC");
- (v) assistance with launch and signing of a pilot PSC with private operators for bus services; and
- (vi) assistance to set up a PSC management system. Proposed to be financed by an international donor, the ETC Fund or EBRD Shareholder Special Fund.

Implementation Summary

In 2018, the Company successfully procured 52 (against the original plan of 49) modern trolleybuses and electrical infrastructure to enhance Bishkek's public transport services. In 2024, the municipality took the decision to replace trolleybuses with battery electric buses with ADB loan. Some trolleybuses that were not transferred to Osh while the remaining ones are the subject for the conversion into battery electric buses, so that they may continue to provide public transport services in Bishkek.

7.3. GRCE2 W2: Bishkek Buses: #51598, Approval date - 17 November 2020, Status - Disbursing

(URL: <https://www.ebrd.com/home/work-with-us/projects/psd/51598.html#customtab-387383e50b-item-ff8bcfb617-tab>)

EUR 25 Million loan for financing the rehabilitation of a bus depot and a purchase of urban buses that run on compressed natural gas (CNG) replacing the existing outdated diesel buses with lower emission vehicles. One of the objectives of the project is to resume service on all of its abandoned routes and start serving new routes in recently developed city areas. In addition, the project was expected to contribute to the City administration's effort to fight the Covid-19 pandemic through the replacement of minibuses by bigger vehicles and additional measures through, for example, better social distancing.

The loan is co-financed with a capital grant of up to €8 million from the EBRD Shareholder Special Fund (SSF) and/or international donors. Technical co-operation assignments as part of this Project: TC1: Project Preparation; TC2: Advance Procurement Support; TC3: Development of a Green City Action Plan; TC4: Project Implementation Support; TC5: Corporate Development Programme.

8. What harm do you believe has been caused, or might be caused, by the Project? *

As indicated in the EBRD project summary documents (summarised above), EUR 24.5 million EBRD loan and grant investments were used for improvements of Bishkek's public transport system, including the purchase of 79 new trolleybuses between 2011 and 2014, as well as 52 new trolleybuses in 2018.

In April 2024, the City of Bishkek informed the public of its decision to transfer Bishkek trolleybuses to the City of Osh. It also informed the public of its plans to transition from trolleybuses to battery electric buses - to be bought with a loan from the Asian Development Bank (ADB) for the Urban Transport Electrification project approved in 2022. However, ADB gave an official letter informing that, according to the initial agreement, the City should replace fossil fuels vehicles with electric ones, and not dismantle the trolleybus system and replace it with e-buses.

[See Annex 1 - Letter from ADB]

Concerned citizens raised the issues mentioned above with the EBRD management in May 2024, both through the Bishkek Resident Office and in Yerevan on the occasion of the EBRD's Annual Meeting and Business Forum. The same issues were raised with ADB Management on similar occasions.

On 29 August 2024, Bishkek City Council formally made a decision to transfer 100 trolleybuses from Bishkek to Osh, while the dismantlement of the trolleybus network started on 19 June. In November 2024 the trolleybus service was fully discontinued. Only about 50 trolleybuses financed by the EBRD loan in 2018 remain in a military storage facility in Bishkek. Before the intervention of development banks, Bishkek had a 210 km long overhead wires network that provided a wide network of sustainable transportation for one of the world's most polluted cities.

The trolleybuses transferred to Osh have been parked on the outskirts of the city and stood there for almost a year, as evidenced by the footage of Facebook user Gulmira Tynaliyeva, who found the capital's trolleybuses at the base of the subsidiary company of "Kyrgyzindustria" - "Kyrgyzchetrans-Osh":



According to the Bishkek City Council information almost all trolleybuses were in operational condition. In the Resolution of the Bishkek City Council dated 30 May 2023 № 87 in the Programme for the socio-economic development of the city of Bishkek for 2024 and the forecast for 2025-2026 written: “ONLY 18% of the total trolleybus fleet were due for decommissioning”, so there were no need to transfer trolleybuses somewhere and they still operational:
<https://cbd.minjust.gov.kg/10-13288/edition/1286738/ru>.

“The city's public transport system consists of 183 passenger trolleybuses, of which 33 (18% of the total trolleybus fleet) are due for decommissioning. The average number of trolleybuses in operation is 130. Of the 596 buses available (including 120 buses purchased at the end of 2022), 300 buses (50.3% of the total bus fleet) are subject to decommissioning”.

The EBRD updated its PSD to inform that the City is now planning to convert the remaining trolleybus fleet funded under the Extension project to battery electric buses, so they may continue to provide public transport services in Bishkek. There are questions about the cost, as well as the technical feasibility and safety, of such conversion. To our knowledge, the last repayment for the EBRD Extension project was made in the first half of 2025.

Meanwhile, as of July 2025 only 2 battery electric buses funded by the ADB have started test rides in Bishkek, with procurement of more buses, conversion of trolleybuses, and training of electric bus drivers still pending. Since November 2024, a fleet of CNG buses has been providing the service on ex-trolleybus routes.

Context: Bishkek has been rated among the top 10 most polluted cities in the World Air Quality rank since at least 2019 (<https://www.iqair.com/ru/kyrgyzstan/bishkek>). For example, in 2021, the concentration of harmful PM 2.5 substances in the atmosphere of Bishkek was more than 25 times higher than the annual average values recommended by the World Health Organization (<https://rtvi.com/news/vozdukh-v-bishkeke-priznan-samym-gryaznym-v-mire/>).

The World Bank in 2023 issued an analysis that reported that exposure to fine inhalable particles (PM2.5 with a diameter of 2.5 micrometers or less) affected inhabitants in Bishkek with serious health risks, including respiratory infections, cancer, cardiovascular diseases, and premature death (The World Bank Air Quality Analysis for Bishkek: PM2.5 Source Apportionment and Emission Reduction Measures
<https://www.worldbank.org/en/events/2023/12/12/report-launch-air-quality-analysis-for-bishkek>).

According to the complex report by the United Nations Development Programme in the Kyrgyz Republic and the United Nations Environment Programme (UNEP) “Air pollution and climate change are interlinked and tackling air pollution is part of the climate agenda. Burning of fossil fuels is by far the largest source of air pollution. Reducing the use of fossil fuels is therefore not only a priority for improving air quality, it is also a priority action for climate change mitigation. Thus, the vast majority of air pollution prevention actions also strongly support climate change mitigation and vice versa. Moreover, investments in climate action often pay off quickly in the short-term through air quality co-benefits via savings in the health sector”. (Report “Air Quality in Bishkek: Assessment of emission sources and roadmap for supporting air quality management”, 2021
<https://www.undp.org/kyrgyzstan/publications/air-quality-bishkek-assessment-emission-sources-and-roadmap-supporting-air-quality-management>).

UNICEF in its 2022 report revealed that air pollution is the single biggest environmental risk factor for premature death and ill-health in Kyrgyzstan, 112 deaths were estimated annually caused by air pollution. (UNICEF report, dated 2022
<https://www.unicef.org/kyrgyzstan/media/8116/file/Executive%20Summary%20of%20Air%20Poll>

[ution%20report.pdf](#)). The main sources of pollution are linked to coal burning and vehicle emissions, while exhaust gases contain large amounts of harmful micro-particles PM 2.5. Air quality particularly worsens in the winter.

In addition, climate change has caused temperatures in the Kyrgyz Republic to rise at twice the global average, exacerbating water stress and the risk of natural disasters. A new Atlas of Environmental Change launched by the UNEP

(<https://24.kg/english/324039> Climate change caused temperatures in Kyrgyzstan to rise at twice global average/) argues that:

«Climate change, which can lead to a decrease in rainfall, shifting snow covers, and glacial retreat, makes it likely that all reservoirs in the country will receive less water over the next thirty years. For example, water inflow to the Toktogul reservoir, a key source of hydropower, is projected to drop by up to 18.8 percent by 2050 — meaning less water to turn turbines and generate electricity. Climate change is furthermore increasing the frequency and intensity of natural disasters».

[See Annex 2 - Chronology]

The demolition of the trolleybus system in Bishkek and the loss of the EBRD-financed trolleybuses, as well as their substitution by CNG buses, has caused the following harm:

8.1. Air pollution in Bishkek.

Considering the vulnerability of Bishkek city to air pollution exposure, the cancellation of trolleybuses has removed the only emissions-free public transport in Bishkek. As a result, trolleybuses have been replaced by private cars and some CNG buses, resulting in a deterioration in the city's air quality during the past year. According to the initial EBRD Agreement, the trolleybus projects had among their goals the reduction of the city's transportation system's negative impacts on air pollution by supporting the procurement of 131 trolleybuses with zero-carbon footprint.

8.2. Health risk for Bishkek citizens due to increased air pollution: As trolleybuses were the only zero-emission public transport in Bishkek, environmental pressure resulting from the loss of trolleybuses has increased dramatically. Although there is no official data available, rough estimates show that, instead of 120 trolleybuses operated on a daily basis, the city hall has provided CNG buses, which is equivalent to roughly an additional 36000 kilometres covered daily by fossil-fuelled transport. In addition, private car use has increased, to compensate for the less reliable public transport in the city, adding to increased emissions and air pollution, thus increasing health risk for Bishkek citizens.

8.3. Climate impact and transport issues - Paris Agreement's National Obligations

The dismantling of the trolleybus system as the only emissions-free mode of public transport has significantly undermined the government's efforts of reducing emissions in line with the ratified Paris Agreement of the UN Framework Convention on Climate Change. According to an opinion from the Ministry of Environment of the Kyrgyz Republic from 9 April 2025, the demolition of trolleybuses violates the Nationally Determined Contributions (NDC) under the Paris Agreement.

[See Annex 3 - the letter from Ministry of Environment]

The NDC envisioned the expansion of the trolleybus network, not its demolition. At the same time, the gas supply for CNG buses is monopolised by a subsidiary of the Russian Gazprom company. These two facts have a relatively similar geopolitical impact, rendering Kyrgyzstan less attractive to foreign green investors and making Bishkek's urban transport dependent on foreign fossil fuels. In contrast, trolleybuses fulfil the international climate agenda and rely on domestic energy production. In addition to the short-term impacts caused by the pollution from the transportation

sector, there is also the risk of long-term impacts on the environment, and especially on melting glaciers, that could have hazardous effects in other parts of Kyrgyzstan and in other countries in Central Asia due to the threat of floods, droughts, and water shortage.

[See Annex 4 and 5 - the letter from City Hall - confirmed replacement and gas volume]

8.4. Reliability and quality of service: In spring 2024, the city hall banned the diesel minibuses, known as 'marshrutkas', which were responsible for up to 80% of the city's transport services. However, the reform did not go as intended, with many city districts facing significant shortages in the provision of public transport service. The demolition of trolleybuses exacerbated this issue by significantly reducing the number of vehicles serving numerous districts. Overcrowding of buses became the norm. Public transport has become less comfortable and less reliable, and in some districts it has even completely disappeared. In contemporary transport academia, these instances are given the name of 'transport poverty'.

Moreover, according to the letter from the City Hall, there is a lack of transportation in Bishkek amounting to about 500-600 vehicles.

[See Annex 6 - the letter from City Hall - Bishkek has lack of public transport]

Current buses are very full and waiting time can be up to 40-60 minutes. Because of high traffic the trip duration can be 1,5-2 hours that means 4-6 hours everyday to reach the destination. That is why the dismantling of the trolleybuses wires was perceived as terrible news by public transport users in Bishkek.

When consulted, the City Hall showed documents only for one street - Abdrakhamanova - failing to provide any orders from the City Hall for the rest of the streets. In November 2024 the trolleybus network at Manas Venue was dismantled, although it was recently renovated under the framework of an EBRD loan [REDACTED].

[See Annex 7 - the letter from City Hall about trolleybus wire dismantling]

Bishkek is a very hot city during summer time but CNG buses have no air conditioning. Because of this the temperature in the bus can be more than +60°C (degree Celsius). In 2024 one person died because of extreme heat

(https://kaktus.media/doc/505854_v_bishkeke_v_avtobyse_166_skonchalsia_passajir.html).

8.5. Cost and affordability of public transport services: Kyrgyzstan has cheap electricity, as most of it comes from hydropower. Trolleybuses were running on zero or low-emissions power.

Unfortunately, so far they have been substituted by private cars and CNG buses that run on imported and much costlier natural gas. There has been one increase in the cost of public transportation in Bishkek, although the quality of the service has decreased since then. A city strategy has reflected this observation as well

(<https://cbd.minjust.gov.kg/10-13288/edition/1286738/ru>).

Moreover, there is no clarity on the cost of conversion of trolleybuses to electric buses, how cost-effective it is, and how it might impact the affordability of public transport.

[See Annex 8 - the letter from City Hall - Costs for trolleybuses]

Details about Tender for conversion

The City Hall announced the tenders for trolleybus conversion into e-bus and twice failed at securing a contractor. The sum of the tender was 5 000 000 soms for 1 trolleybus (it is about 50 000 EUR). The letter from the city hall says that they will use money from the municipal budget as well,

that means public money from tax payers. According to information in the media, after failing twice to promote a successful tender, the City Hall made a direct contract with an unknown Chinese company that raised serious concerns about security for passengers for transport users. . We also spoke with the producer company and they said that the Bishkek City Hall had asked them about the potential for the buses conversion, but they refused because of the unworthiness and irrationality of the project. Conversion would also require the creation of project documentation and certification after model testing [REDACTED]

Links for tenders:

[REDACTED]

[REDACTED]

[See Annex - 9 activists' views, the White you see] [bal the letter from City Hall confirming that conversion will be from public funds]

8.6. Accessibility for vulnerable groups: Women, children, the elderly and other vulnerable groups have been impacted disproportionately, due to their higher reliance on public transport. Trolleybuses are high-capacity, low-floor vehicles, whereas the new CNG buses are smaller and have a less spacious low-floor section. This leads to cuts in transport services for disabled people and limits the attractiveness of carrying bulky luggage, strollers, and even bicycles, which makes public transport less accessible for vulnerable groups - and basically for everyone.

[See Annex 10 - the letter from Association for people with disabilities]

8.7. Violation of the right to public participation in breach with the National Law and EBRD Loan Agreements:

Both the EBRD and the City of Bishkek failed to meaningfully include the impacted public, Bishkek citizens, in decision-making. Although an online public consultation in the period 6 June - 6 July 2024 has taken place, the overwhelming support of citizens for trolleybuses was ignored in the decision to dismantle the system and transfer it to Osh. In addition, no discussions have taken place on the topic of conversion of trolleybuses into battery electric buses.

The Resolution of trolleybus transfer was made with a number of violations of the procedures for decision-making processes, violating the citizens' rights to development, access to information, public participation, and justice. There are several phases that such documents need to go through before being adopted, and affected groups were proactively sharing recommendations through the official mechanisms. However, inputs from the public were not taken into consideration in the decision-making process.

Below you can find detailed information about how affected groups of people tried to impact this decision and how the voices of hundreds of affected people were ignored, resulting in the abovementioned harm which should be instantly stopped and remedied:

- Public Consultations announcement
- Public Consultations
- Approval by Deputies Permanent Committees of the Bishkek City Council
- Open Session of the Bishkek City Council with voting
- Public Protests in a context of Shrinking Public Space
- Court cases after the resolution was adopted

Public consultations and access to information:

On 5 June, 2025 - a draft of the Resolution of the transfer of 100 trolleybuses from Bishkek to State property, and then to Osh, was published for online public hearing on the Bishkek City Council website. The financial analytical report disclosed by the city hall explicitly states that there would be less transportation in Bishkek if trolleybuses were given away, which means that the city will lose public transport service.

[See Annex 11 - the Financial Statement]

It's important to mention that 131 out of all 183 trolleybuses in Bishkek were bought with loans from the EBRD in 2011 and 2015. Trolleybuses purchased from the EBRD Extension project loan (active as of August 2024) were also on the list for giving away. That is why these Public Consultations concerned both loan agreements (<https://www.gorkenesh.kg/ru/the-rulings-of-the-bgk-mob/28-sozyv/5896-152-on-giving-consent-to-the-gratuitous-alienation-of-passenger-trolleybuses-into-the-state-ownership-of-the-kyrgyz-republic.html>).

[See Annex 12 - the list of given away trolleybuses (2018 year are from the active loan)]

Participation in Public Consultations

Around 300 letters with recommendations were sent out to the deputies of the Bishkek City Council during the official dates of public consultations. In these letters people declared that they are AGAINST the giving away of 100 trolleybuses from municipal property. Additionally, affected groups collected about 200 signatures that were also sent to the deputies of the Bishkek City Council and the Bishkek City Hall to reiterate their demands.

The Permanent Committees of Deputies of the Bishkek City Council

The Permanent Committees of Deputies of the Bishkek City Council held four sessions to discuss the issue of trolleybuses. The Proposed Plan was rejected on two such occasions. In two sessions, the Permanent Committees of Deputies of the Bishkek City Council did not provide any access for citizens, nor any protocols of the sessions.

Normally, video protocols for all sessions with municipal deputies are available online. In both sessions of the Transport and Property Committees on 13 June and 3 July 2024 the initiative of giving away trolleybuses was rejected. Recently both video-protocols were deleted from the website, which is why there is no access to these protocols through the links provided before.

<https://web.archive.org/>

- 13 June 2024 - The Session of the Permanent Committee on Housing and Utilities, Fuel and Energy, Transport, Communications and Ecology of the Bishkek City Council (BCC) (https://www.facebook.com/watch/live/?ref=watch_permalink&v=2467949720081342).
- 3 July 2024 - The Session of the Permanent Committee on Municipal Property, Land Issues, Urban Planning and Architecture. During public Consultations, at the session of the Bishkek City Council deputies said that citizens had sent around 300 letters and were AGAINST giving away 100 trolleybuses from municipal property. The draft resolution was rejected, citing the reason that residents were opposed and there was no consent from the

EBRD(<https://www.facebook.com/100064256212119/videos/396312579544508>).

Besides this, the BCC confirmed that they do not have the protocols of the sessions when the decision was made. This means again affected groups are prevented from accessing timely and reliable information. The Permanent commissions of the Bishkek City Council must provide the positive conclusion for the project but nothing is available. It is important to know how they took an evening with Aalte.

28 August 2024 - The BCC Permanent Committee on Property, transportation, budget, and legal issues held another closed session, the recording of which is not available on the official channel of the BCC. They rewrote the resolution, excluded the necessity of the clearance from the Financial committee, did not mention the loan, and agreed to proceed further for voting.

“Open Session” and blocked doors by Police and the municipal administration

On 29 August 2024 a city parliament discussed the transfer of trolleybuses. An entrance to the ‘OPEN’ gathering in the municipal administration was blocked by the police. The clearance for the discontinuation of trolleybuses was signed by 5 deputies. In addition, peaceful gatherings were limited by police forces.

- 29 August 2024 - Resolution № 152 On giving consent to the transfer of trolleybuses into state ownership of the Kyrgyz Republic was accepted by Bishkek City Council with many violations of National law and Loan agreement. (Published 09/05/2024) (<https://www.gorkenesh.kg/ru/the-rulings-of-the-bgk-mob/28-sozyv/5896-152-on-giving-consent-to-the-gratuitous-alienation-of-passenger-trolleybuses-into-the-state-ownership-of-the-kyrgyz-republic.html>).

On the same day, three female citizens attempted to participate in this open session of the Bishkek City Council (on the transfer of the trolleybuses). Although the hearing was officially an open event, activists were denied access to it by at least six police officers and administration employees. One of the affected people was taken to the nearest police station after she were repeating “Save Bishkek Trolleybus” from outside the hearing. Police officers did not explain to her the reasons for her detention, not even when they apprehended her at the police station, in a blatant violation of her rights under national and international law

Another female activist who attempted to participate in the open hearing, was similarly detained and held in the police building for about six hours. She was subjected to a compulsory alcohol test at a narcological center. The brief detention in the police building was carried out by officers of the Ministry of Internal Affairs under the Code of Offenses (which establishes responsibility for minor violations of the law). However, the Code only allows restricting a person's freedom of movement for no more than three hours.

Subsequently, the police press service reported that a “preventive conversation” had been conducted with the activists, after which they were released. These actions by the police officers violated the rights of activists to participate in the democratic conduct of public affairs, to personal liberty and security, and to access justice.

[See Annex 13 - the letter from the Bishkek City Council about participation in Public Hearings]

[See Annex 14 - the letters from citizens to the Bishkek City Council for Public hearings]

[See Annex 15 - the letters from citizens to the city hall with 200 signatures]

Public Protests and Shrinking Public Space that also limiting public participation:

The court's ban on holding peaceful assemblies in the territory of Bishkek has been in place since March 2022, initially for a period of six months and then has been repeatedly extended every six months. However, international human rights law and Kyrgyzstan's national legislation do not allow the authorities to impose a blanket ban on all future peaceful assemblies across the entire city. Despite this, the ban has been repeatedly extended by the authorities and has been in effect for more than two and a half years. Thus, this judicial ban, along with the refusal of courts at all levels to consider appeals against it, grossly violates the right of Kyrgyzstan's citizens and all other concerned individuals to peaceful assembly, as protected by Article 21 of the International Covenant on Civil and Political Rights. It also deprives citizens of their right to access justice, in violation of Article 14 of the Covenant.

[See Annex 16 - the Supreme Court Decision about limitation of peaceful meeting for saving trolleybus]

8.8. Cultural heritage: In 2024, Bishkek city celebrated the 74th anniversary of the trolleybus system. This mode of transport has become part of the city's cultural identity. Numerous protests and acts of civil disobedience have demonstrated its importance to citizens, not just in a pragmatic sense, but as a symbol full of positive associations about historic experiences and modernisation of our capital for the benefit and comfort of its citizens. A lot of artists, photographers, and poets dedicated their art works to Bishkek Trolleybus as a further demonstration of its cultural and historical meaning (see, e.g., <https://stihi.ru/2017/12/21/1662>, <https://stihi.ru/2025/02/05/1811>).

National cinema KyrgyzFilm produced a movie about women trolleybus drivers “Trolleybus goes through the city (Bishkek)” [REDACTED]

(<https://www.youtube.com/watch?v=TO7zRs95hZI>).

8.9. Labour issues: The demolition of trolleybuses has also led to unemployment for hundreds of people, especially women (regardless of the fact the EBRD's Bishkek Public Transport project has stated gender equity and women's employment as one of its main objectives). The infrastructure for trolleybuses encompasses not only the vehicles, but also a sophisticated system of electricity supply, overhead wires network, substations, as well as educational facilities. The Bishkek trolleybus system was rather large by international standards and was in the top 20 worldwide for network length. Its closure not only led to job losses for hundreds of people, but also resulted in a loss of skills in the maintenance and the provision of sustainable public transport. Since last year many workers were cut out from stable income. Families have to suffer because of the turbulent situation.

According to the National Law at least 70 % of the salary should be paid if the company has a reorganization process. Instead, those who wanted to study and became CNG bus drivers had to take a loan and pay for their studies by themselves without any income for living cost expenditures. There was also the Order for the layout of 21 workers from the Energy Department. Because of the client's suggestion to give away 100 trolleybuses, the responsible municipal company fired at least 21 workers in contravention of national law and international human rights provisions on labor. In the Lay Out Order directors of the trolleybus company indicate 4 November 2024 as the date on which they stopped driving the trolleybus. It is not clear on the basis of what documents was this date set.

Lay Out Order ‘On the reduction of staff units’

Based on Resolution No. 10-927 of 19 June 2024 'On the dismantling of the contact network' and the order of the Department of Transport and Transport Infrastructure Development and the decision of the city council of 29 August 2024 'On the transfer of 100 trolleybuses to the city of Osh,' starting from 4 November 2024, in connection with the termination of all trolleybus routes... (full in the Annex).

https://www.vb.kg/doc/442068_100_trolleybysov_otpravili_v_osh_no_tam_oni_gniut.html

[See Annex 17 - order to lay off 20 employees of the trolleybus management]

If the City Hall decided to close trolleybus infrastructure by any reason, they should take responsibility for workers in line with the Kyrgyz Republic's obligations under national as well as international law on labour rights. Especially, workers in the transport industry are very vulnerable and the Bishkek City Council should ensure conditions that avoid or minimize harm. It confirmed last UN Secretary-General's remarks on Climate Action in this speech "A Moment of Opportunity: Supercharging the Clean Energy Age": "In all transitions, there are people that lose opportunities in their lives, so it is extremely important to support the regions and to support the people that are affected by this transition... I think when one sees sectors that will tend to reduce and sectors that are going up, we need to make sure that we care about the people that are affected by this transition - people and regions"

(<https://www.un.org/sg/en/content/sg/statement/2025-07-22/secretary-generals-remarks-climate-action-moment-of-opportunity-supercharging-the-clean-energy-age-delivered-scroll-down-for-all-french>).

8.10. Gender issues: There are numerous negative social impacts towards women on employment issues, access to service, childcare.

Women's employment - some of the fired women had been working in the trolleybus company for 20-30 years, sometimes even 40. Now they do not have the opportunity to find better jobs because of their age and the narrow nature of their skills in the field. Highly qualified professionals in the energy and technical engineering sectors are lacking in Kyrgyzstan as they require special education and experience which is not easily developed, and it's hard to spend elsewhere (i.e., in other sectors).

Some of the women are single mothers and need to feed their families, but currently find themselves without any income, with the consequent risk of becoming frustrated and depressed. High-qualified professionals in the energy sector and technical service are very rare professions in Kyrgyzstan and require special education and experience to work in this sector.

Women - passengers mostly have no cars that could substitute for the loss of regular and reliable public transport options. This became a barrier for various opportunities - less job opportunities, and less paid, leading to less income and potential poverty increases. Sometimes they have to ride with 1-3 children. That is why it is also important to have proper conditions, but for now experiencing high discomfort, heat and stress in overcrowded public transport.

Women - citizens are more vulnerable to air pollution. Because of less income they have less access to the healthcare system, less opportunities to buy expensive air cleaners. One pulmonologist of the Kyrgyz Republic argued about the impacts of air pollution in Bishkek on babies of pregnant women (<https://youtu.be/9INipn0UFJ8>). At the Conference about air pollution this year (2025), the representatives from the Ministry of Health Care said that around 40% of children aged 0-14 years

are having lung diseases. Women as primary caregivers to sick children bear the brunt of the worsening air quality and health situation. It is necessary to maintain sustainable transportation to reduce pollutants and reduce risks for the health of women and children.

9. Are you directly and personally affected by the Project? *

Yes, as elaborated above, as citizens of Bishkek we are directly affected by this project.

10. Have you ever contacted the EBRD or the EBRD Client to try to raise and voice your concerns? *

We sent numerous emails to the EBRD's CSO Engagement Team ([REDACTED]), and exchanged other direct e-mails with the EBRD Management. More detailed correspondence will be provided with all copies.

Here is the Summary of our attempt to reach EBRD.

We had a number of attempts to reach out to the EBRD management, but our questions were not answered to a great degree. We wrote a number of letters to EBRD with sending documents and statements that we don't agree that our trolleybuses be transferred somewhere else.

May 2024 - meeting with EBRD representatives at the bank's annual meeting and business forum in Yerevan. The issue was raised and papers with the intentions of local officials were provided.

6 June 2024 - Bishkek City Hall requested the Bishkek City Council (BCC) to give consent to the alienation of 100 Bishkek trolleybuses from the Bishkek municipal property - A draft of the resolution was published to start the Public Hearings.

24 June 2024 - The EBRD sent a letter to the Bishkek Mayor's Office stating that since this is a loan (\$23.5 million) for Bishkek trolleybuses, and all trolleybuses were to be destined for Bishkek only, they cannot be transferred elsewhere without the EBRD's written consent.

On 24 June 2024, the EBRD sent a letter to the mayor of Bishkek city copying the Bishkek Trolleybus Department, Ministry of Finance and Ministry of Economy and Commerce of the Kyrgyz Republic.

In the letter, the EBRD noted that the trolleybuses were purchased under credit and grant agreements between the bank and the Kyrgyz Republic for a total amount of EUR 23.5 million, including capital investment for EUR 8.4 million. The bank also informed that the trolleybuses under these credit agreements ought to be operationalized in Bishkek city, and any actions related to their donation or rent require the bank's approval. The bank raised concerns that donation of trolleybuses can negatively impact the credit agreement since the decision of the transfer of trolleybuses to Osh city has not been agreed or secured with the bank. To be able to further assess actions in decision making, the bank requested detailed economic and operational justification for donation, and the city plan in regard to trolleybus infrastructure in the context of a transition to sustainable and green transport.

8 August 2024 - online meeting with EBRD representatives. According to their statements, they do not have a “full picture” and have to scrutinize the issue further. [REDACTED], [REDACTED] and other EBRD representatives were present.

4 September 2024 - the second request to EBRD on data provision about the Bishkek Public Transport Project.

5-8 September 2024 - 6-20 trolleybuses were delivered to Osh (without documents signed by the Cabinet of Ministers KR and EBRD consent).

6 January 2025 - Presentation at the Tuesday group meeting with US governors.

07 February 2025 - Citizens have found Bishkek trolleybuses abandoned at one storage - around 50-60 new EBRD trolleybuses (https://www.youtube.com/watch?v=YGFnj2R_738). New Letters to the Bishkek City Hall, Bishkek City Council, EBRD and ADB with only one thing - save Bishkek Trolleybus.

4-7 May 2025 - At the 58th Annual Meeting of the ADB Board of Governors in Milan, Italy meetings with the Minister of Economic of KR and other representatives of the Ministries delegations from Kyrgyz Republic.

13-15 May 2025 - EBRD 2025 Annual Meeting and Business Forum in London. Meeting with Bank Management, implementation, evaluation Teams, EBRD Board.

Communication between EBRD and Client:

24.06.2024, №5533

From: EBRD

To: the Bishkek City Hall, [REDACTED]

Copy: Municipal Company “Bishkek Trolleybus Company”, [REDACTED] Director

Ministry of Finance of Kyrgyz Republic, Deputy of the Minister, [REDACTED]

Ministry of Economics and Commerce of Kyrgyz Republic, [REDACTED] Minister

Topic: Draft resolution of the Bishkek City Council “On granting consent for the transfer of passenger trolleybuses to state ownership free of charge”.

In the letter from EBRD to the City Hall the Bank also concern that giving away 100 trolleybuses may impact negative environmental circumstances:

“The potential transfer of trolleybuses, in particular, affects Section 3.01 (Other Additional Project Obligations) of the Loan Agreement, Section 2.01 (Project Support) of the Project Support Agreement 3.02 (Negative Financial Covenants) Project Agreements, which require the EBRD's consent for any transfer, lease or other disposal of all or a significant portion of the assets operated by the project entity.

Given that this resolution may adversely affect compliance with the terms of the EBRD Loan Agreement, and in order for the Bank to assess the implications of the changes contemplated by the draft resolution, the Bank would appreciate it if you could provide a formal clarification of your intentions.

06.12.2024, №5663

From: EBRD

To: The Department of Transport and road infrastructure development of the Bishkek City Hall, [REDACTED]

Copy: [REDACTED]

Topic: Request for consent to the transfer of passenger trolleybuses to state ownership free of charge.

It is the EBRD to official Request from the Bishkek City Hall for consent to the transfer of passenger trolleybuses to state ownership free of charge. This letter from the EBRD regional director for Kyrgyz Republic Ayten Rustemova confirms that there were no any official persimission given from the EBRD to give away trolleybuses. The same day the Resolution № 738 of 6 December 2024 “On the transfer of trolleybuses” of the Cabinet of Ministers of Kyrgyz Republic was adopted about transfer 100 trolleybuses out of the municipal property. There 100 trolleybuses were funded by EBRD including the active loan for that moment. The full list of property is here and in the annex.

<https://cbd.minjust.gov.kg/7-36211/edition/22983/ru?anchor=pr1>

[See Annex 18 - the letters from EBRD Regional Director about possible negative impact]

[See Annex 19 - the Resolution № 738 of 6 December 2024 “On the transfer of trolleybuses” of the Cabinet of Ministers of Kyrgyz Republic]

b) with the **EBRD Client** responsible for the Project.

<https://bishkekismog.info/2025/01/17/gk/>

Yes. Summary:

On 9 May 2024 - more than 1600 people signed an open letter to the Bishkek Mayor’s office on the issue of the planned removal of the trolleybuses and their transfer to Osh. https://24.kg/obschestvo/293282_bishkek_mojet_ostatsya_bez_trolleybusov_sozdana_petitsiya/ , https://secure.avaaz.org/community_petitions/ru/meriia_goroda_bishkek_za_sokhranenie_ekologic_heskogo_transporta_bishkekского_trolleibusa/?utm_source=sha

Purpose: In the appeal, residents, environmental experts and activists raised concerns about the replacement of trolleybuses with 120 electric buses supported by the Asian Development Bank (ADB). Activists noted that the demolition of trolleybus infrastructure is an irreparable mistake and would jeopardize the development of emission-free electric transport. Activists pointed out that carbon emission free trolleybuses do not emit air pollution, and prevent diseases caused by air pollution from fossil fuel. Thus 120 electric buses to be procured under the ADB project should supplement trolleybuses, not replace them. Electric buses should replace gas and other carbon emitting buses. Also, electric buses would reach half the routes of the trolleybuses and require regular battery charge and their renewal (which would be more harmful to the environment than the use of trolleybuses).

On 13 June - a public appeal against the Bishkek City Council’s draft resolution. As a result of the campaign, about 300 citizens submitted complaints to the Bishkek City Council

From 19th June, despite the apparent lack of legal grounds and absence of approval by Bishkek City Council of the resolution, the Bishkek Trolleybus Department under the mayor’s office started demolishing the trolleybus lines. More than 14 km of lines were reportedly removed to date. We have wrote again letters to the Bishkek City Hall and the Bishkek City Council with demands to save Bishkek Trolleybus and stop the demolition.

[REDACTED]

On 28 June, the police prohibited a photo exhibition and gathering dedicated to the preservation of trolleybuses entitled "My Love – Trolleybus" in a residential area of Bishkek city. Event was organised by the urban initiative "Peshkom ("By foot")". The prohibition was justified by a court decision banning peaceful assemblies in all parts of central Bishkek (apart from Gorky Park), in place since March 2022.

<https://media.kg/news/bishkek-milicziya-ne-dala-aktivistam-provesti-fotovystavku-moya-lyubov-trollejbus-v-9-mikrorajone/>

On 3 July, the police prohibited another civic protest entitled "Last trolleybus". Participants stood at a bus stop and symbolically waited for the arrival of trolleybuses (knowing that the trolleybus would not come, one that can be last one). A group of 10-15 policemen approached participants of the protest action at the bus stop and showed the court decision banning peaceful assemblies in all parts of central Bishkek (except for a certain area, which is the only area where public assemblies are allowed in Gorky Park). Earlier one activist received a phone call from an official from the State Committee on National Security (SCNS)¹ from the 10th department working on extremism related issues, who exerted psychological pressure and demanded cancelling of the protest action, and threatened the detention. .

6 July 2024 - the official end of public hearings. According to the official statements, more than 300 responses were received in opposition to the idea of discontinuation of the trolleybus system and were against giving consent to the gratuitous alienation.

9 July 2024 - The letter to the President of KR with request to stop the demolition of a trolleybus system.

10 July - the official letter from the International Association of Public Transport on preventing the dismantlement of trolleybus infrastructure.

18 July - appeal to the Bishkek city court on the banning of assembly on 3 July 2024. The court refused to consider the case.

22 July - appeal to the Supreme Court on the same issue - The Supreme Court refused to consider her appeal referring to the passed deadline to challenge the court's ban on peaceful assemblies.

31 July - a peaceful assembly (of affected people - youth, environmental and civic activists) in the only allowed place in Gorky Park for the preservation of trolleybuses. As a result of the campaign, a citizen resolution was drafted demanding the restoration of the demolished trolleybus infrastructure and the cancellation of the transfer of trolleybuses to other cities. The "resolution" was signed by the participants of the campaign and was submitted to the mayor's office.

29 August 2024 - Resolution No. 152 On giving consent to the transfer of trolleybuses into state ownership of the Kyrgyz Republic was accepted by Bishkek City Council with many violations of National law and Loan agreement. (Published 09/05/2024). Two citizens were illegally detained due to their desire to participate in the "open" session.

[REDACTED]

On 29 August - the Bishkek City Council adopted (<https://www.youtube.com/watch?v=WKFUPIEM8k4>) the resolution allowing the transfer of 100 trolleybuses from Bishkek to Osh city (despite citizens' and activists' numerous appeals to the Mayor's office and Bishkek City Council to keep trolleybuses for Bishkek city residents).

6 September - protest action for the preservation of the trolleybuses in the Gorkiy Park. No arbitrary detentions of organizers and activists were documented, the protest action went peacefully. Few unknown participants made videos of the protest and recorded the activists during the protest as it was happening every time.



1 October - an open letter signed by 30 international scholars in the field of transport and mobilities studies on the prevention of dismantlement of trolleybus infrastructure.

12 December 2024 - termination of working contracts for 21 employees of trolleybus company. Many inconsistencies with the National Labour Code. Letters to the Trolleybus company.

07 February 2025 - Citizens have found Bishkek trolleybuses abandoned at one storage - around 50-60 new EBRD trolleybuses (https://www.youtube.com/watch?v=YGFnj2R_738). New Letters to the Bishkek City Hall, Bishkek City Council, EBRD with request to start trolleybus service.

15 May - informal exchange with the minister of economy during the ADB annual meeting in Milan.

All supporting documentation must be sent via email to IPAM (ipam@ebrd.com)

Step 2: Additional Information if available:

11. What do you hope to achieve through the IPAM process?

Our main goal is to get at least the 52 remaining trolleybuses - bought with the second tranche in 2018 and currently stored in Bishkek - back on the streets in operation and serving the needs of Bishkek citizens. A long-term goal is to develop the trolleybus infrastructure further since substations and poles are still available. This will help improve the air quality in our city, lowering health risk from air pollution, improving the reliability, accessibility and affordability of public transport service.

We hope to achieve this through open and constructive dialogue with the decision-makers of Bishkek City (and potentially representatives of relevant ministries). This is our sub-goal, to have the voice of citizens heard in a facilitated and constructive problem solving process, and to receive transparent information and feedback from decision-makers.

We also expect that the EBRD will use its power and leverage to enforce legal agreements with its clients, to ensure that its resources are well spent and the objectives of its projects are achieved, bringing long-term sustainability to Bishkek's public transport system. Adverse impacts on local communities that would violate their basic human rights - including in relation to health, labor conditions, and general economic and social conditions - should be avoided in all possible ways, and limited and then remedied if avoidance is not possible in the circumstances.

In addition, the EBRD should ensure that technical cooperation resources from its donors - both on the project level, as well as for the work on the Bishkek Green City Action Plan (GCAP) - are well used and result in lasting improvements in the environmental conditions in Bishkek (e.g. air quality), emission reductions in line with the Republic of Kyrgyzstan's NDC, as well as socially just and accessible public services.

12. IPAM has two paths for reviewing your concerns.

Path 1– Problem Solving: *IPAM can act as a neutral third Party to help find mutually-satisfactory resolutions through flexible, consensus-based problem solving approaches.*

Path 2 – Compliance Review: *IPAM engages with Project-affected people, Bank staff, Clients and others to determine whether the Bank has met the provisions of its [Environmental and Social Policy](#) and/or [Access to Information Policy](#). The Compliance function only deals with compliance of the Bank, not that of the Client.*

At this point, and subject to obtaining more information, what would be your preference?

As explained above, to achieve our expectations, the requesters' preference is Path 1– Problem Solving. If Problem Solving is not possible, then we request Path 2 - Compliance Review of EBRD's met the provisions of the bank's ESP and AIP policies.

13. Please list the Policy requirements you believe the EBRD has not met on this Project, if you are familiar with the [Environmental and Social Policy](#) or [Access to Information Policy](#).

Requesters understand that the EBRD's role was to ensure compliance of the two trolleybus projects, from 2011 and Extension from 2015, with ESP 2008 Performance Requirement 1 'throughout the life of the bank's involvement with the project'. We understand that the significant material changes to the two trolleybus projects - i.e. complete loss of assets acquired with the EBRD loans - occurred as the client was repaying the two loans and about to complete the projects. We are also aware that, after concerns were raised by civil society, the EBRD has attempted to clarify with its client the fate of the trolleybuses and to warn the City of Bishkek about its potential breach of obligations under the contract.

We also understand that the CNG Buses project, GrCF2 W2: Bishkek Buses, from 2020 was likely assessed and implemented according to the requirements of the EBRD's Environmental and Social Policy from 2019. The three projects are interrelated in different ways, for example, in how they contribute cumulatively to the improvement or deterioration of air quality in the city, or to the implementation of Bishkek's Green City Plans (GCAP). There were potential synergies for providing good working conditions, requalification and transfer of employees of public transport companies.

While requesters appreciate the limited leverage of the EBRD to influence the decisions of the City of Bishkek, we also believe that the EBRD should have initiated an E&S assessment of the consequences of dismantling the trolleybus system, such as air pollution and related health risks, loss of jobs of trolleybus company workers, and increased GHG emissions. Such assessment was not done, to our knowledge. For example, did the EBRD request a Retrenchment Plan from its client, to ensure that adverse impact on workers of the trolleybus company were mitigated properly?

Or did the EBRD carry out an assessment on how the reforms in the public transport system would impact the implementation of the GCAP's objectives?

In addition, the three projects are interconnected, because several trolleybus routes are now covered by CNG buses. The material changes, therefore, concern the whole public transport system and its remaining components, including EBRD financed CNG buses and technical cooperation. For example, there are concerns about the increased costs for the City of Bishkek - and ultimately for service users - due to increased reliance on CNG buses running on imported and costly fuel, the costly transfer of 100 trolleybuses from Bishkek to Osh, potential conversion of trolleybuses to e-buses. All these additional costs are coming from tax-payers money and are expected to reflect on the affordability of public transport services in Bishkek. Has the EBRD requested from its client to present justification for the above costs?

Not to forget that the EBRD is also invested in the public transport of the City of Osh. According to activists 30 trolleybuses are already operating in Osh city. In 2017 and 2018, 23 new trolleybuses were purchased under a loan from the EBRD for Osh city. Additionally, around 50-70 new buses are complementing the trolleybuses. Given the total number of about 80-110 pieces of transportation, Osh city is fully packed. The additional 100 trolleybuses that will be transferred from Bishkek would make it impossible to fit in the depot of Osh city considering that only one trolleybus depot is available in Osh. There is a risk that most of the trolleybuses that will be transferred from Bishkek end up unused and rusting in Osh city.

Therefore, the EBRD needs to be accountable, if it took every measure that was available and required by its policy, to defend the public interest and ensure the sustainability of investments, proper mitigation of adverse impacts resulting from significant material changes to the three projects, and prudent use of the technical cooperation grants.

ESP 2008

In our view, the EBRD has not fully met commitments made in its 2008 Environmental and Social Policy, namely:

- Article 6 on climate mitigation and adaptation,
- Article 7 on access to environmental information and public participation, in accordance with the UNECE Aarhus Convention,
- Article 9 with regards to the implementation of Kyrgyzstan's National Determined Contributions,
- Article 10 with regards to donor coordination for the implementation of the Bishkek Green City Action Plan and urban development plans and strategies, and in connection to ADB's investments in electric buses. There is even article in the loan agreement, that investments can't be replaced
- Article 11 and article 12 on prudent use of TC grants for "*promoting sustainable business practices and corporate responsibility, building the necessary capacity for consideration and management of environmental and social issues in its countries of operations, or increasing equitable access to the potential benefits of Bank-funded projects*"

With regards to the EBRD's roles and responsibilities in the project cycle, the EBRD has failed to implement articles 34-37 relating to Monitoring of environmental and social impacts and implementation of loan agreements. Although requesters are aware of the attempts of the bank to

question the fate of the trolleybuses, and although the initial loan and the extension loan were repaid by 1Q 2025 (to our knowledge), the EBRD has agreed to or perhaps even allowed the conversion of trolleybuses into electric buses, without proper assessment of the costs, E&S impacts and safety considerations of this conversion. If any assessments of the projects' material changes were made, they were not communicated or consulted with the affected public.

In addition, the bank continues to be invested in the public transport in Bishkek with its project for CNG buses, technical cooperation grants, as well as through the GCAP, which provides some leverage to question the integrity of the system, the negative E&S impacts of the dismantling of the trolleybus infrastructure, the economic rational and cost implications etc. If the EBRD did use this leverage, it was not done in a transparent and consultative manner. In this regard, the EBRD has breached its obligation under Article 39 on Operational changes:

“Changes can occur in the nature and scope of the project or the EBRD operation following Bank approval and signing. Such changes may have significant environmental or social implications associated with them. When such material changes are envisaged, the Bank will carry out an appraisal of the proposed changes in accordance with this Policy and any additional due diligence investigations, public consultation requirements, and environmental and social mitigation measures will be incorporated into the modified/ restructured project documentation. Where operational changes will result in a materially different environmental and/or social scenario than approved by the Bank, the change will be reported to senior management and if appropriate submitted to the Board for information or approval.”

In violation of ESP 2008 Article 41, and of the AIP, there was no separate PSD for the Extension project, as it was initially merged in one PSD with the original 2011 project. The Extension project PSD only appeared in the Project Finder in 1Q 2025 - possibly after the final repayment and completion of the project.

The demolition and loss of the trolleybus system of Bishkek puts under questions EBRD's role in *Promoting investments with high environmental and social benefits, including working in partnership with others*, Articles 43-46, and specifically Article 46 that concerns environmental benefits in the Municipal Environmental Infrastructure sector, related affordability issues and co-financing with ADB.

In addition, we allege that, although the trolleybus investments have brought benefits to Bishkek for a decade, the EBRD has failed to ensure the sustainability, prudent use of public resources and long-term sustainability through proper monitoring and legal contract implementation, resulting in harm related to the following Performance Requirements:

PR 1, # 7. *Environmental and social issues and impacts will also be analysed for the relevant stages of the project cycle. These may include preconstruction, construction, operations, and decommissioning or closure and reinstatement.*

PR 2, Retrenchment #17. If the client anticipates collective dismissals as defined in Article 1 of EU Directive 98/59, the client will develop a plan to mitigate the adverse impacts of retrenchment, in line with national law and good industry practice and based on the principles of non-discrimination and consultation. Without prejudice to more stringent provisions in national law, such consultation will involve reasonable notice of employment changes to the workers' representatives and, where appropriate, relevant public authorities, so that the retrenchment plan may be examined jointly in

order to mitigate adverse effects of job losses on the workers concerned. The outcome of the consultations will be reflected in the final retrenchment plan.

In our view, the EBRD has failed to assess the project's lifecycle, the waste of both assets and tax-payers money for cost-ineffective measures, or the impacts of the decommissioning of the projects, as required by PR3, *Pollution prevention, resource conservation and energy efficiency*, # 10. During the design, construction, operation and decommissioning of the project (the project lifecycle) the client will consider technical characteristics of the installation concerned, its geographical location and local/ambient environmental conditions and apply pollution prevention and control technologies and practices (techniques) that are best suited to avoid or, where avoidance is not feasible, minimise or reduce adverse impacts on human health and the environment while remaining technically and financially feasible and cost-effective.

Similarly, the EBRD has failed to ensure that the client would assess the impact of the decommissioning of the project on the community health, in line with PR4, #7. The bank has also failed to ensure that the client would consult the impacts of the decommissioning of the trolleybus system on public health, as required by PR4, #8.

Because of the historical and cultural significance of trolleybuses for many Bishkek citizens, we believe that our cultural heritage has been harmed by the dismantling of the system. For example, in many cities metro systems are considered as places of cultural significance - with beautiful architecture and decoration of metro stations, murals, historical ruins exhibited underground etc.. While Bishkek does not have a metro, trolleybuses carry very similar meaning to the city's culture and history. Since it does not concern architecture or specific sites, we consider it to be intangible cultural heritage related to our capital's history of modernisation, as well as trolleybuses as communal spaces where people shared stories and memories. While this perception of cultural heritage does not seem to be reflected in the EBRD's policy, we insist that compliance with PR 8 needs to be included.

Finally, The EBRD has failed to ensure compliance with PR 10. Although there were public consultations, these were of extremely low standard, with many violations and inconsistencies, as the access to sessions has been obstructed, there were threats of reprisals and actual incidents of reprisals, and most importantly - the numerous inputs from the public were completely ignored in the decision making without proper justification or logical explanation.

14. Have you submitted any complaints to other organisations in relation to the concerns raised in your Request?

No

15. Any other information you consider relevant

15.1. Based on the Human Rights Council resolution everyone should have the right for safe air. Inconsistencies in project implementations can cause a negative harm for our air quality, health and quality of life.

48/... The human right to a safe, clean, healthy and sustainable environment
Human Rights Council resolution <https://docs.un.org/en/a/hrc/48/1.23/rev.1>

General Assembly resolution <https://digitallibrary.un.org/record/3982508?ln=en&v=pdf#files>

Enjoying a safe and healthy environment is impossible without clean air:

"Recognising that, on the contrary, the effects of climate change, unsustainable management and use of natural resources, air, land and water pollution, the irrational handling of chemicals and waste, the resulting loss of biodiversity and reduction in ecosystem services, impede the enjoyment of a safe, clean, healthy and sustainable environment, and that environmental damage has negative consequences, both direct and indirect, for the effective realisation of all human rights."

At the meeting with us, we voiced our concerns, and UN High Commissioner for Human Rights Volker Türk, at a meeting with the President and members of the Government, expressed his opinion that smog problems should be addressed more effectively. https://www.vb.kg/doc/444139_komissar_oon_yveren_cho_problemy_smoga_v_kr_nyjno_reshat_bolee_effektivno.html.

15.2. 100 of trolleybuses were sent to Osh, but Osh had their own EBRD loan for them.

In 2024, the mayor's office of Osh city asked the Presidential Administration of the Kyrgyz Republic to provide the city with 100 trolleybuses. Based on the enquiry, the mayor's office in Bishkek initiated discussions about the transfer of trolleybuses operating in Bishkek to Osh city. The mayor's office in Bishkek reportedly² referred to the Asian Development Bank's (ADB) Urban Transport Electrification Project to justify the trolleybus removal and their transfer to Osh city. The ADB project envisages the purchase of 120 modern battery-electric buses to replace outdated diesel buses and electric trolleybuses in Bishkek³.

Osh received a loan from the EBRD in 2014 to upgrade its trolleybuses, and last year 2024 another loan was approved by the EBRD to purchase new trolleybuses. Osh has only 2 lines and can not operate all of them, according what we now only 8 trolleybuses out of 100 are in use in Osh. It an attempt to build the third line and they cut down wires from Bishkek, but unclear why, because project has component of the construction of the new third line in Osh.

² This information is included in the response letter addressed to [REDACTED] from the Bishkek Trolleybus Department under Mayor's office of Bishkek on the case of demolition of trolleybus lines, dated 28 June 2024

³ The ADB's project on purchase of 120 electric buses amounts to a \$25 million loan, a \$25 million grant, and \$650,000 in cofinancing from the High-Level Technology Fund. On 21 June 2024, the ADB issued a statement that there is no link between its planned urban transport electrification project and the local authorities' initiative to relocate the existing trolleybuses to other cities. ADB declared that the bank is distancing itself from any decision by local authorities to transfer the existing trolleybus fleet to other cities. The bank also clarified that the purchase of electric buses was designed to support Bishkek mayor's office in strengthening the environmentally friendly transport, which has been displaced by fossil-fueled buses and minibuses in recent decades. https://24.kg/obschestvo/297112_trolleybusyi_VSelektrobusyi_oproekte_elektrifikatsii_transporta_ra_sskazali_vabr/?fbclid=IwZXh0bgNhZW0CMTEAAAR3x0wkDOPaGrbf_ZhvyBB2YVh7TfireXO-eZGMD8GI0MT8Zr7309IaZyUk_aem_YIUthlsyFJKdRcfiZeG4A

2023-2024 - GrCF2 W2 — Osh Electric Public Transport
Approval Date: 22 Oct 2024
Project number: 53522
Total project cost: EUR 23 million
<https://www.ebrd.com/work-with-us/projects/psd/53522.html>

2014 — Osh Public Transport Project (Location: Kyrgyz Republic)
Project number: 44243
Total project cost: EUR 9.6 million
<https://www.ebrd.com/work-with-us/projects/psd/osh-public-transport-project.html>

If in the loan of new project “GrCF2 W2 — Osh Electric Public Transport” there was funding to build a new (3rd) line in Osh, why has the client Bishkek City Hall cut out the wires, some of which were bought with the EBRD loan for the project in Bishkek? The Mayor said that we need to “help” the Osh city and give them away our trolleybuses’ wires, pillars and substations.

15.3. The Office of the High Commissioner for Human Rights has sent the Communication to the Kyrgyz Government “Information received concerning the Bishkek City Council decision to cancel emission free public transportation (trolleybuses)”.

Ref.: AL KGZ 1/2025

Mandates of the Special Rapporteur on the promotion and protection of human rights in the context of climate change; the Special Rapporteur on the human right to a clean, healthy and sustainable environment; the Special Rapporteur on the rights to freedom of peaceful assembly and of association and the Special Rapporteur on the situation of human rights defenders:

We are equally concerned about the municipalities’ decision to dismantle a well-established and well-resourced zero-emission public transportation system in Bishkek, which is particularly vulnerable to air pollution exceeding WHO air quality guidelines by up to 30 times in winter. At the end of 2024, Bishkek city was allegedly ranked first among the most polluted cities in the World Air Quality Index. The air quality was ranked as the maximum “dangerous”. The replacement of emission-free public transportation with gas-powered transportation undermines national efforts to comply with the Paris Agreement in terms of climate change mitigation and the obligations of public authorities to protect human rights in the context of climate change, including the human right to healthy and the human right to a clean, healthy, and sustainable environment, which includes clean air and a safe climate as substantive elements.⁹ In fact, these changes and the replacement of a zero-emission transportation system with gas powered buses might worsen the air quality and the level of carbon emissions.

We are concerned about the fact that the court's ban on holding peaceful assemblies in the territory of Bishkek has been in place since March 2022, initially for a period of six months and then has since been repeatedly extended every six months. We recall that international human rights law and Kyrgyzstan's national legislation do not allow for the imposition of a blanket ban on all peaceful assemblies. This judicial ban, combined with the refusal by courts at all levels to consider appeals against it, seems to violate the right of the population to peaceful assembly, as protected by article 21 of the International Covenant on Civil and Political Rights.

As highlighted by the Human Rights Committee, “blanket restrictions on peaceful assemblies are presumptively disproportionate” and “there can be no blanket ban on all assemblies in the capital city, in all public places except one specific location within a city, or outside the city centre, or on all the streets in a city” (CCPR/C/GC/37, para. 38 and 55). Finally, we are concerned about the

disproportionate use of force against environmental human rights defenders in Bishkek in response to peaceful and lawful actions, as well as the associated risks of their further criminal and administrative persecution, which may have a chilling effect on environmental activism more broadly.

Full text with annexes

15.4. Local and international groups don't agree with transferring trolleybuses and converting them into trolleybuses.

8 June 2024 - Public protest in trolleybus organized by citizens ‘ [REDACTED]

2 July 2024 - Exhibition [REDACTED] obstructed by police [REDACTED].

3 July 2024 - Protest by citizens to save the trolleybus system in Bishkek. Threats and limitations by police. [REDACTED]

20 June 2024 - Due to the public protests all demolition works were shifted to the night time. Dismantling continued without any legal permissions.

28 August 2024 - Press conference with citizens, human rights activists, and lawyers [REDACTED]

6 September 2024 - The protest by citizens against giving away trolleybuses and the trolleybus system liquidation [REDACTED]

17 January 2025 - Presentation in the National parliament on the issue of 3 loans for ecological transportation for Bishkek <https://www.youtube.com/watch?v=hVxwdY9RSEw>. Letters to the National Parliament.

[REDACTED] has released articles on the issue of replacement of the trolleybuses in Bishkek with electric buses of the ADB. Bankwatch raised concerns about environmental impact on air quality if the trolleybuses are cancelled, absence of public participation in decision making, and issued recommendations addressed to the ADB and Bishkek City Council for preservation of the trolleybuses:

1. Bishkek's electric trolleybuses under threat from ADB funded transport overhaul [REDACTED]

2. The last trolleybus of Bishkek: mayor's decision defies logic and undermines foreign investments in green transport [REDACTED]

ANNEXES

[See Annex 1 - Letter from ADB]

[See Annex 2 - Chronology]

[See Annex 3 - the official letter from the Ministry of Environment that says because of the dismantling of trolleybuses - the National Climate Programme 'at risk of failure'.

Annex 4 and 5 - the letter from City Hall - confirmed replacement and gas volume

[See Annex 6 - the letter from City Hall - Bishkek has lack of public transport]

[See Annex 7 - the letter from City Hall about trolleybus wire dismantling]

[See Annex 8 - the letter from City Hall - Costs for trolleybuses]

[See Annex 9 - activists, celebration letter from City Hall confirming that conversion will be from public funds]

[See Annex 10 - the letter from Association for people with disabilities]

[See Annex 11 - the Financial Statement]

[See Annex 12 - the list of given away 100 trolleybuses (2018 year are from the active loan)]

[See Annex 13 - the letter from the Bishkek City Council about participation in Public Hearings]

[See Annex 14 - the letters from citizens to the Bishkek City Council for Public hearings]

[See Annex 15 - the letters from citizens to the city hall with 200 signatures]

[See Annex 16 - the Supreme Court Decision about limitation of peaceful meeting for saving trolleybus]

[See Annex 17 - order to lay off 20 employees of the trolleybus management]

[See Annex 18 - the letters from EBRD Regional Director about possible negative impact]

[See Annex 19 - the Resolution № 738 of 6 December 2024 "On the transfer of trolleybuses" of the Cabinet of Ministers of Kyrgyz Republic]

Extra:

Tenders

Nationally Determined Contribution