

PUBLIC

**DOCUMENT OF THE EUROPEAN BANK  
FOR RECONSTRUCTION AND DEVELOPMENT**

**PUBLIC INFORMATION POLICY  
IMPLEMENTATION REPORT 2017**

PUBLIC

**PUBLIC INFORMATION POLICY  
IMPLEMENTATION REPORT 2017**

**INDEX**

**EXECUTIVE SUMMARY ..... 2**

**1. INSTITUTIONAL INFORMATION ..... 4**

**2. INFORMATION ON STRATEGIES AND POLICIES ..... 4**

**3. PROJECT-RELATED INFORMATION ..... 5**

**3.1. PUBLIC SECTOR PROJECTS ..... 6**

**3.2. ENVIRONMENTAL AND SOCIAL INFORMATION RELATING TO PROJECTS ..... 7**

**4. ACCOUNTABILITY AND GOVERNANCE RELATED INFORMATION ..... 9**

**5. INFORMATION CONSIDERED CONFIDENTIAL (SECTION E OF THE PIP)..... 11**

**6. IMPLEMENTATION AND MONITORING OF THE PUBLIC INFORMATION POLICY (SECTION F OF THE PIP)..... 11**

## PUBLIC INFORMATION POLICY IMPLEMENTATION REPORT 2017

### EXECUTIVE SUMMARY

The Public Information Policy (PIP) sets out how the European Bank for Reconstruction and Development (“EBRD” or the “Bank”) discloses information and consults with its stakeholders to promote awareness and understanding of its activities. The full text of the PIP is published on the website here: <http://www.ebrd.com/what-we-do/strategies-and-policies.html>

The PIP requires an annual report on its implementation to be published on the Bank’s website. This report covers the period from 1 January to 31 December 2017.

The PIP was agreed by the Board of Directors in 2014 and will be reviewed in parallel with the Environmental and Social Policy and the Project Complaint Mechanism Rules of Procedure (PCM) in 2019.

### Highlights in 2017

In 2017, the Bank:

- was in **compliance with the PIP except for:**
  - late disclosure of one Project Summary Document, and
  - not disclosing 45 **Project Summary Documents** for non-transactional **TC projects over €300,000** in 2017. After this gap, all of the PSDs for 2018 have been published to date.
- **enhanced the environmental and social information in Project Summary Documents (PSDs)** for Category A and B projects by including more information on environmental and social due diligence findings, agreed mitigation measures and stakeholder engagement plans.

On the non-disclosure of PSDs for non-transactional TC projects over €300, 000, responsibility for publishing these moved to a different part of the Bank after an organisational restructuring. Information from the 45 projects that qualified for a PSD was published in subsequent procurement notices during 2017. After this gap, all of the PSDs for 2018 have been published to date.

In 2017, the Bank continued to report its activity to the **International Aid Transparency Initiative** (IATI) platform at an increased frequency as recommended by the NGO, Publish What You Fund (PWYF). Work has continued to enrich the Bank’s IATI submissions with new indicators published in the second half of 2017. During 2017, the Bank met PWYF senior management in a number of meetings to discuss the methodology of the upcoming 2018 Index to be published mid-2018.

The Secretary General received **one appeal** under the PIP on disclosing climate finance project related information. As a result of the appeal and following a number of information requests, the EBRD will now disclose climate finance data on a project level (rather than by sector or by country) which is in line with the PIP. For 2017, a threshold for

climate finance of €40 million will be applied. From 2018 onwards, the climate change mitigation and adaptation finance for all projects will be made publicly available and no threshold will be applied. This information will be published in the Bank's Sustainability Report.

## 1. INSTITUTIONAL INFORMATION

The schedule of Board discussions and Country and Sector Strategies was updated on the Bank's website on a monthly basis. Information was provided on the agenda items for each of the next two Board meetings.

The minutes of 29 Board Meetings held in 2017 were posted on-line after approval of these minutes by the Board. Minutes were published for the following Board meetings: 11 and 25 January; 8, 22 and 28 February; 8 and 22 March; 5 and 26 April; 3/4 May; 7, 20, 22 and 27 June; 5, 7 and 18 July; 6, 8, 19/20 September; 4 and 18 October; 1, 8, 16, 21, 28 and 29 November; 13/14 December.

The Terms of Reference and membership of Committees of the Board of Directors were posted on the website.

The Bank publishes an organisation chart on its website which is regularly updated.

The salaries of senior management and Directors are contained in the 2016 Annual Financial Report, which was published on-line in 2017.

Information on the Administrative Tribunal was posted on-line and updated as required.

## 2. INFORMATION ON STRATEGIES AND POLICIES

In 2017, nine draft Country Strategies were posted for comment on the Bank's website and translated into the relevant official national language as required by the PIP. Eight Country Strategies were approved. A summary of public comments received was made available.

The Country Strategies approved by the Board in 2017 were posted on-line with the reports on the public's comments (see **Table 1**).

**Table 1: Draft, Board approved & Translated Country Strategies in 2017**

Country	Dates of public consultation	Board approval 2017	Posted on ebrd.com (translated version date in brackets if later)
Montenegro	7 Mar 2017 – 20 Apr 2017	3 May	4 May 2017 (25 May 2017)
Croatia	10 Feb 2017 – 27 Mar 2017	7 June	8 June 2017 (16 June 2017)
Egypt	9 Dec 2016 – 23 Jan 2017	8 February	8 February 2017 (12 Oct 2017)
Kazakhstan	7 Apr 2017 – 22 May 2017	5 July	7 July 2017 (21 July 2017)
Mongolia	24 Mar 2017 – 8 May 2017	7 June	9 June 2017 (20 June 2017)
Bosnia & Herzegovina	3 May 2017 – 16 June 2017	5 July	17 July 2017 (21 July 2017)
Slovak	6 Oct 2017 –	29 November	30 November 2017 (1 December

Republic	19 Nov 2017		2017)
Moldova	20 Sep 2017 – 4 Nov 2017	29 November	4 December 2017 (6 December 2017)
Serbia*	11 Dec 2017 – 25 Jan 2018		

\* This strategy was Board approved on 14 February 2018 and will be included in the PIP Implementation Report 2018.

The Bank's first **Economic Inclusion Strategy** was Board approved on 4 May and the **Extractive Mining Industries Strategy** was Board approved on 13 December. Both were published on line.

The Strategy Implementation Plan 2017-2019 was published on ebrd.com in Q1 2017.

### 3. PROJECT-RELATED INFORMATION

The Bank informs the public of project development through Project Summary Documents (PSDs) published on ebrd.com. PSD alerts were received by 7255 subscribers in 2016. In 2017 this increased to 8418 subscribers. The ebrd.com page on PSDs is the most viewed page on the website and had a total of 107,584 page views.

In 2017, 203 projects (163 private sector and 40 public sector) were prepared for Board consideration. With one exception, all of these were compliant with the PIP:

**Non-compliant PSDs:** Belinvestbank Subordinated Loan (public sector project - sovereign loan to the Republic of Belarus for the purpose of issuing a subordinated loan to Belinvestbank) –Due to the President having to sign the project during his visit to Belarus, the Board date was brought forward and the PSD was released 43 days before Board approval (rather than 60 days).

**No PSDs for non-transactional TC projects over €300,000** (PIP, section 3.1.6) were published in 2017 and the Bank was non-compliant with this section. The Bank should have published 45 PSDs for these projects. Information about these projects was published in the relevant procurement notices. PSDs for non-transactional TC projects over €300,000 approved to date in 2018 have been disclosed on the website.

**Table 2: PSDs published for Board approvals in 2017**

PSDs for Private sector projects	Number
Compliant with policy	163
Non-compliant with PIP	0
<b>Total number of private sector PSDs</b>	<b>163</b>
Deferrals in accordance with PIP *	29**
Capital markets transaction	21
Legitimate sponsor concerns on confidentiality	9
Likelihood of substantial changes at Final Review	3

<b>PSDs for Public sector projects</b>	
Compliant with policy	39
Non-compliant with PIP	1
<b>Total number of public sector PSDs</b>	<b>40</b>
Deferrals in accordance with PIP	4**
Capital markets transaction	1
Legitimate sponsor concerns on confidentiality	2
Likelihood of substantial changes at Final Review	1
<b>Other</b>	
PSDs: non-transactional TC projects over €300,000 (section 3.1.6)	0
Cancelled, rejected or inactive PSDs removed from the website (section 3.3)	3

\* Stated legitimate reasons for the deferrals exceed the number of actual deferrals because in a few cases there was more than one reason for the request.

\*\* Numbers of PSD deferrals are lower than 2016 as 2017 figures do not include PSD deferrals requested for projects which subsequently did not proceed to Board or were cancelled following Board approval and before PSD release.

Each PSD reflects the EBRD financing on a project at the time of Board approval.

Of the 163 private sector PSDs, there were 29 deferrals to the 30-day release timeframe, all of which were authorised within the terms of the PIP.

Of the 40 public sector PSDs, there were 4 deferrals to the 60-day release timeframe, which were authorised within the terms of the PIP.

In the reporting period from 1 January to 31 December 2017, 150 PSDs were translated into the relevant official national languages. The remaining PSDs were for regional projects that did not require translation. No translations remained outstanding.

### 3.1. Public sector projects

Board Reports for public sector projects are made available to the public on request, after the project has been approved by the Board of Directors.

The PIP was subject to a first **PCM complaint after late disclosure of a public sector Board Report in 2016**. The Compliance Review found non-compliance with the PIP, by failing to respond to a request to disclose a Public Sector Board Report within the timelines outlined in the policy. The Management Action Plan responding to this complaint can be found here: <http://www.ebrd.com/work-with-us/project-finance/project-complaint-mechanism/pcm-register.html>

The Bank has since taken a number of actions to strengthen internal processes when these requests are made. As a result, the six Board Reports requested in 2016 were disclosed within the PIP timelines for responses. In 2017, the Bank received four requests for Public Sector Board reports, as listed below. All four requests were responded to in compliance with the PIP:

**Table 3**

	Project	Country	Date of request	Date of disclosure
1	Samruk Energy Restructuring and Transformation Project	Kazakhstan	07.02.17	24.02.17
2	PGE Grid Enhancement for Renewables	Poland	28.04.17	21.06.17
3	GAM Solid Waste Crisis Response Programme	Jordan	12.06.17	10.07.17
4	Trans-Anatolian Natural Gas Pipeline (TANAP)	Azerbaijan	06.11.17	04.12.17

**Table 4: Requests for Public Sector Board reports over the past 6 years**

Year	2012	2013	2014	2015	2016	2017
Requests per year	0	3	1	1	6	4
Met PIP timeline: up to 40 working days	No requests	3	1	0	6	4

### 3.2. Environmental And Social Information Relating To Projects

Fourteen new Category A projects requiring an Environmental and Social Impact Assessment (ESIA) were in an active disclosure period during 2017. Full ESIA disclosure packages for all these Category A projects were available in English and in local languages and were disclosed on-line. Links were provided to each project's ESIA on ebrd.com and on the client's website. PSDs are also cross-linked with ESIA's for Category A projects.

An ESIA was also disclosed for **Mersin Wastewater project in Turkey** approved by the Board in 2012. The project was initially categorised B, but due to the decision by the client to amend the design to increase the plant's capacity, the project was re-categorised A, and the ESIA was disclosed and the PSD updated.

Nine of the Category A projects were submitted for approval by the Board of Directors and five have not yet been scheduled for Board consideration. Two additional projects that were in a disclosure process were cancelled and will be removed from the Bank's website after six months, in line with the PIP.

Of the projects submitted for Board approval, all projects met the requirement of 60 days minimum disclosure for private sector projects or 120 days minimum disclosure for public sector projects prior to the Board of Director's consideration of the project.

In 2017, PSDs for Category A and Category B projects were reviewed and the environmental and social content enhanced. 12 PSDs for Category B projects attached Non-Technical Summaries. All PSDs for Category B projects had their environmental and social sections expanded providing enhanced information.



PSDs were published for 10 projects approved under delegated authority due to significant environmental and/or social issues (section 3.1.2).

The EBRD published portfolio information on projects approved during the year in the 2016 Annual Sustainability Report launched during the EBRD Annual Meeting in May 2017:

<http://www.ebrd.com/news/publications/sustainability-report/sustainability-report-2016.html>

**Table 5: Summary of Category A Disclosure/Board Review in 2017**

Country	Project Name	Sector	Date ESIA on EBRD website and in RO	Board or other approval date	Days publicly available (before approval)	Language of ESIA
Regional	<a href="#">Trans Adriatic Pipeline Project</a>	Private	19 Dec 2017	Not yet scheduled	n/a	English/Greek/Albanian/Italian
Turkey	<a href="#">Mersin Wastewater Project</a>	Public	15 Dec 2017	29 May 2012		English
Turkey	<a href="#">Tumad Gold Mines Development Loan (Project Maple)</a>	Private	29 Sept 2017	29 Nov 2017	62	English and Turkish
Jordan	<a href="#">Shobak Wind Farm</a>	Private	14 Sept 2017	16 Nov 2017	64	English and Arabic
Belarus	<a href="#">Belarus Road Sector Reform Project</a>	Public	11 Aug 2017	31 Jan 2018	174	English and Russian
Moldova	<a href="#">Green Cities: Chisinau Solid Waste</a>	Public	10 Aug 2017	14 Feb 2018	189	English and Romanian
Moldova	<a href="#">Moldova Romania Power Interconnection Phase I</a>	Public	27 July 2017	29 Nov 2017	126	English and Moldovan/Romanian
Bosnia and Herzegovina	<a href="#">Corridor Vc in FBH - Part 3</a>	Public	21 July 2017	14 Feb 2018	209	Bosnian and English
Romania	<a href="#">BRUA Pipeline</a>	Public	14 July 2017	13 Dec 2017	245	English and Romanian
Bosnia and Herzegovina	<a href="#">Corridor Vc in Republika Srpska: Johovac to Rudanka</a>	Public	23 June 2017	16 Nov 2017	147	English and Serbian
Azerbaijan	<a href="#">Azerbaijan: Southern Gas Corridor</a>	Public	16 June 2017	18 October 2017	125	English and Turkish
Kosovo	<a href="#">Kijeve – Peje (Zahag) Highway</a>	Public	26 May 2017	13 Dec 2017	202	English and Albanian
Serbia	<a href="#">Kovacia Wind Farm</a>	Private	05 Apr 2017	05 July 2017	92	English and Serbian
Georgia	<a href="#">Nenskra HPP</a>	Private	17 March 2017	17 Jan 2018	307	English and Georgian
Kazakhstan	<a href="#">Kyzyl Project</a>	Private	17 Feb 2017	04 May 2017	77	English, Russian and Kazakh

#### 4. ACCOUNTABILITY AND GOVERNANCE RELATED INFORMATION

##### List of ineligible entities

Following the entry into force of the Agreement for Mutual Enforcement of the Debarment Decisions amongst the Bank, the African Development Bank Group, the Asian Development Bank, the Inter-American Development Bank, and the World Bank Group (available at <http://www.ebrd.com/downloads/integrity/Debar.pdf>), in 2017 the Bank cross debarred 91 entities and 28 individuals based on debarment notices received.

In 2017, following separate proceedings instituted under the Bank's Enforcement Policy and Procedures, the Bank issued debarments against 11 individuals and eight corporate entities. The list of all EBRD debarred entities and individuals can be found at <http://www.ebrd.com/ineligible-entities.html>

The Bank's Enforcement Policy and Procedures was amended from 4 October 2017 and the revised version can be found at: <http://www.ebrd.com/cs/Satellite?c=Content&cid=1395242259920&pagename=EBRD%2FContent%2FDownloadDocument>

##### Anti-Corruption Reports

The Integrity and Anti-Corruption Report for the year 2017 will be released and posted on the Bank's website May 2018.

##### Project Complaint Mechanism (PCM)

A summary of PCM activities undertaken during 2017 is available in the PCM Annual Report for 2017, to be published in April 2018: <http://www.ebrd.com/work-with-us/project-finance/project-complaint-mechanism/about.html>.

Six independent Experts (i.e., part of the PCM Roster of Experts) assisted the PCM Officer in the review of Complaints received during 2017. An ad hoc expert also conducted Eligibility Assessments and Problem-solving Initiatives relating to PCM Complaints during the year. Information regarding the current PCM Experts can be found at: <http://www.ebrd.com/work-with-us/project-finance/project-complaint-mechanism/pcm-experts.html>.

In 2017, the PCM received twenty-seven new Complaints, out of which ten were registered. Seventeen Complaints were found ineligible for registration as they related to procurement, labours and contractual issues, and allegations of fraud and corruption, which fall outside of the PCM's mandate. Complaints found ineligible for registration are redirected to the appropriate office within the Bank.

In 2017, eight Complaints were found eligible for Compliance Review and Problem-solving. Issues raised by Complainants relate to project categorization, stakeholders engagement, access to information, allegations around the violation of workers' rights, expropriation and

resettlement issues. Comprehensive information on all registered Complaints is available on the PCM Register: <http://www.ebrd.com/work-with-us/project-finance/project-complaint-mechanism/pcm-register.html>.

In total, PCM published twenty-one reports during the year: six Eligibility Assessment Reports; four Compliance Review Reports; two Problem-Solving Initiative Reports; and nine Monitoring Reports. These are available on the PCM Register: <http://www.ebrd.com/work-with-us/project-finance/project-complaint-mechanism/pcm-register.html>.

## Evaluation

The following evaluation documents were published on ebrd.com:

**Table 6: Evaluation documents**

Document type	Publication in 2017
<ul style="list-style-type: none"> <li>the Bank's Evaluation Policy;</li> </ul>	<a href="#">Evaluation Policy</a>
<ul style="list-style-type: none"> <li>EvD's Annual Evaluation Review (AER);</li> </ul>	<a href="#">Annual Evaluation Review 2016</a>
<ul style="list-style-type: none"> <li>EvD's Annual Work Programme and Budget;</li> </ul>	<a href="#">Work programme 2017-19 &amp; budget 2017</a>
<ul style="list-style-type: none"> <li>Summaries of Operational Evaluations</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Operation evaluation summary: Almaty transport integrated approach</a></li> <li><a href="#">Operation evaluation summary: An ICT company</a></li> <li><a href="#">Operation evaluation summary: A petroleum distribution company</a></li> </ul>
<ul style="list-style-type: none"> <li>special and thematic studies and approach papers.</li> </ul>	<a href="#">Use of Subsidies Phase 1</a> <a href="#">Small Business Support Programme 2011 to 2015</a> <ul style="list-style-type: none"> <li>Investment climate support: <a href="#">Info sheet</a>   <a href="#">Approach Paper</a></li> <li>Infrastructure project preparation facility: <a href="#">Approach Paper</a></li> <li>Additionality thematic review: <a href="#">Approach Paper</a></li> <li>Transport strategy review: <a href="#">Approach Paper</a></li> <li>Energy sector review: <a href="#">Approach Paper</a></li> <li>Property strategy review: <a href="#">Approach Paper</a></li> </ul>

One meeting of the Bank's Environmental and Social Advisory Council was held on 21 November 2017. A summary of the meeting can be found here:

<http://www.ebrd.com/cs/Satellite?c=Content&cid=1395271626222&pagename=EBRD%2FContent%2FHublet>

The Annual Procurement Review, the Annual Report on Engagement of Consultants by EBRD, the Corporate Procurement Review, the PIP Implementation Report and the Annual Financial Report were published in 2017.

## 5. INFORMATION CONSIDERED CONFIDENTIAL (SECTION E OF THE PIP)

Section E of the PIP deals with confidential information that is not disclosed.

## 6. IMPLEMENTATION AND MONITORING OF THE PUBLIC INFORMATION POLICY (SECTION F OF THE PIP)

### Relations with civil society

In 2017, the EBRD has continued its proactive engagement with civil society organisations (CSOs) across its region. The Bank's Civil Society Capacity Enhancement Framework established a stronger partnership between the Bank and civil society through technical cooperation projects aimed at enhancing the capacity of local CSOs and facilitating their engagement with EBRD projects and policy dialogue activities.

At the end of 2017, the Framework comprised a total of 20 technical cooperation projects worth around €5.2 million, up from 15 projects worth around €3 million in 2016. The Framework has benefitted nearly 7,000 civil society and community representatives in 15 countries, often through tailored capacity-enhancement activities.

CSOs were regularly informed about the latest EBRD developments through dedicated webpages, a quarterly EBRD-CSO Newsletter, email notifications and alerts, and use of social media platforms.

CSOs that had registered with the EBRD (around 2,200) were notified about the start of the consultation period for Category A projects and invited to provide comments on the Environmental and Social Impact Assessments (ESIAs) to the Bank and its clients.

During 2017, the Bank organised over thirty thematic meetings and events with civil society, attended by nearly 400 civil society representatives. These meetings engaged CSOs in the process to develop the Bank's key policies, sectoral strategies, country strategies and complex investment projects.

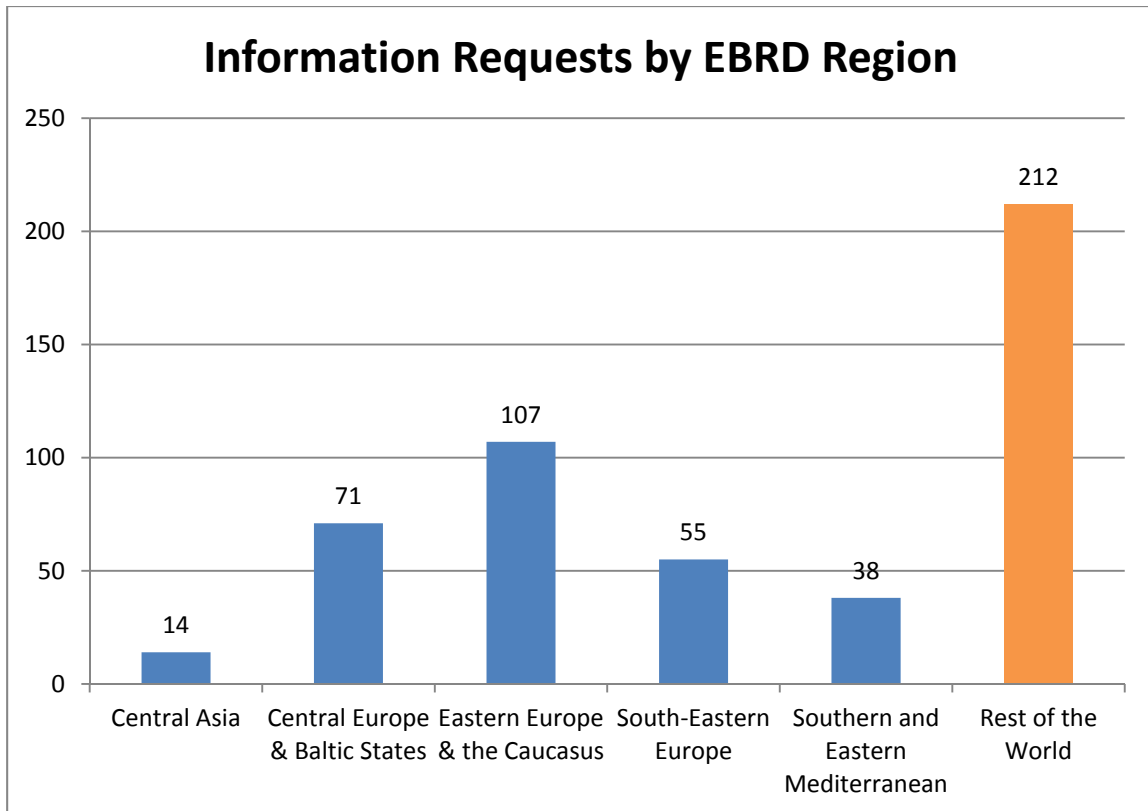
The flagship event of EBRD's engagement with CSOs – the 2017 Civil Society Programme – took place on 9-11 May in parallel with the EBRD's Annual Meeting and Business Forum. Almost 100 civil society participants from 25 countries attended.

### ***Responding to Information Requests***

Of the total 524 requests, 508 were related to the PIP, and concerned accountability and governance (35); general institutional information (37); policy and strategy (12); projects and project finance (396); publications (4); and other (24).

Not all those who submitted a PIP-related request identified their professional activity. Where identified, PIP-related requests came from the following senders: 251 from civil society; 58 from business or private enterprise; 15 from students or academics.

Below is a chart illustrating the sources of requests in geographic terms, (where the person requesting identified his/her nationality).



The number of information requests and responses covered above relates to those received via the “enquiries” mailboxes or via online requests. This does not reflect the total correspondence received by the Bank and the total correspondence that the Bank conducts with external audiences.

In 2014 and 2015, the Communications Department coordinated responses to correspondence. In 2016, a new system was set up with separate contact points accessible via the ebrd.com homepage under [“Enquiries”](#).