

**PUBLIC INFORMATION POLICY:  
REPORT ON IMPLEMENTATION 2011**

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## **Public Information Policy: Report on Implementation 2011**

### **Executive Summary**

The Public Information Policy (PIP) establishes how the EBRD discloses information and consults with its stakeholders so as to promote better awareness and understanding of its strategies, policies and operations. The PIP<sup>1</sup> commits the Bank's management to report annually to the Board of Directors on implementation of the PIP, with the findings to be posted on the Bank's website. This implementation report covers the period 1 January to 31 December 2011.

In 2011, the Bank was in compliance with most PIP requirements:

#### *Institutional information*

- This was posted on the web as required.

#### *Strategies and policies*

- Public consultation was conducted on five Country Strategy reviews.

#### *Project related information*

- 135 private sector Project Summary Documents (PSDs) were posted on the web. All PSDs were PIP compliant. Three requests were received for the release of Board documents on public sector projects.

#### *Translations into official national languages*

- Approved Country Strategies and PSDs were translated as required. The posting of some translated Country Strategies took longer in some cases due to administrative and technical issues in the translation process. While the majority of translated PSDs were posted in a timely fashion, there were some delays.

#### *Environmental and social information*

- Environmental and Social Impact Assessments (ESIAs) on all "Category A" projects were made available in a local language for the required number of days with the exception of the Western High Speed Diameter Central Section PPP (WHDS) project in Russia. The WHDS project was prepared as a Private Sector project during due diligence and the 60 day disclosure requirement was met. However, the winning concessionaire was state-owned, and therefore at the end of due diligence, the applicable time period requirement for consultation changed from 60 to 120 days. This project was submitted to the Board of Directors and approved with a derogation on timing.

#### *Accountability and governance information*

- This was posted as required.

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<sup>1</sup> The Policy was most recently reviewed and updated in 2011, with the new provisions applying from 1 November 2011.

### *Requests for information*

- The Bank responded promptly to requests for information. There were no appeals against decisions regarding refusals to requests for information that the Bank was unable to release.

## **Implementation record: 1 January 2011 - 31 December 2011**

Each PIP obligation and report on its implementation is addressed below, in the order in which these appear in the Policy.

### **1. Institutional information**

#### **1.1 Schedule of forthcoming Board discussions**

##### **PIP requirements:**

*“The Bank will post in a dedicated website location the schedule for Board discussions of forthcoming Country Strategies, Sector Strategies and Projects. The Projects scheduled for discussion will have a link to the Project Summary Documents already posted on the web. The schedule will be updated on a monthly basis. It should be noted that the precise scheduling of individual items can change.”*

##### **Implementation:**

The schedule of Board discussions of forthcoming Country Strategies and projects was updated on the Bank’s website throughout 2011 on a monthly basis. No Sector Strategies were reviewed. In addition, specific information was provided on the items to be discussed at each of the next two Board meetings.

#### **1.2 List of forthcoming Strategy and Policy reviews and updates**

##### **PIP requirements:**

*“The Bank will post on its website a list of impending reviews in order to give adequate advance warning of the posting of draft reviews and updates.”*

##### **Implementation:**

The Bank’s website was kept up to date with information on impending reviews of forthcoming Strategies and Policies for 2011.

#### **1.3 Board Minutes**

##### **PIP requirements:**

*“The Bank will release Minutes of meetings of the Board of Directors which will contain the following: (i) the names of attendees; (ii) a record of the approval of the Minutes of the previous meeting; (iii) titles of the agenda items; and (iv) agreements and decisions reached.”*

##### **Implementation:**

The Minutes of 18 Board Meetings held in 2011 were posted on the website following approval of these Minutes by the Board. These Minutes were for the Meetings on the following dates: 1 February; 15 February; 2, 15 and 29 March; 12/13 April; 4 May; 14 and 28 June; 12 and 26/27 July; 1, 13 and 29 September; 11 and 25 October; 8 and 22 November. The Minutes of the

Board Meetings of 18 and 25 January; 12 May; 1 June, 6 and 13/14 December were classified as *Strictly Confidential* and were not therefore posted.

#### **1.4 Board Committees**

**PIP requirements:**

*“The Terms of Reference and membership of the Committees of the Board of Directors will be posted on the website.”*

**Implementation:**

Terms of Reference and membership of Committees of the Board of Directors were posted on the website soon after the annual approval by the Board on 26/27 July 2011 of the new composition of the Committees.

#### **1.5 Organigram of the Bank**

**PIP requirements:**

*“The Bank will post on its website an organigram of the EBRD identifying the various departments and component parts of the institution.”*

**Implementation:**

Throughout the year the Bank updated the departmental organigrams and administrative structures posted on the website.

#### **1.6 Salaries of Senior Management and Directors**

**PIP requirements:**

*“The Bank will disclose the salaries of the President, Vice Presidents, Directors and Alternate Directors and the range of salaries for senior management in the Bank’s Annual Financial Report.”*

**Implementation:**

This information was contained in the 2010 Bank Annual Financial Report, which was posted on the website in May 2011.

The 2011 Annual Financial Report is currently in preparation and, when published in May 2012, will be posted on the website.

#### **1.7 Administrative Tribunal**

**PIP requirements:**

*“The Bank will post on its website details of the Bank’s Administrative Tribunal as well as copies of its decisions.”*

**Implementation:**

Information on the Administrative Tribunal was posted on the Bank’s website and updated as required.

## **2. Information on strategies and policies**

### **2.1 Country Strategies**

The Bank develops Country Strategies for its activities in each country of operations. The object of the Country Strategies is to provide a brief review of the Bank's operations to date, an assessment of the operational environment and transition challenges, and an indication of strategic priorities for banking operations in the relevant country. As appropriate, environmental and social information, including in respect to gender, is included in summary format in the Bank's Country Strategies.

#### ***Draft Country Strategies***

##### **PIP requirements:**

*"The Bank will invite the public to provide input to the preparation of Country Strategies on the basis of a draft Country Strategy document.*

*The draft Country Strategy will be publicly released and posted on the Bank's website, following a process which includes consultation with the country concerned. The draft Country Strategy will be posted for a period of 45 calendar days, during which time the public is invited to send comments to the Bank.*

*A summary of public comments received will be made available to the Board of Directors in a Report on the Invitation to Comment before final approval by the Board of the Country Strategy."*

##### **Implementation:**

Strategies for five of the Bank's countries of operations came up for review in the period 1 January to 31 December 2011, and the public were invited to comment on each of the drafts which were posted on the website for 45 calendar days.

In order to collate public comments, a dedicated e-mail address was set up for each Strategy under review, with access given to the Stakeholder Relations Department.

At the time of the Strategy posting, the Civil Society Engagement Unit alerted CSOs in the relevant country, as well as all other relevant international CSOs in the Bank's database, to the fact.

In 2011 the EBRD also introduced new measures to strengthen the quality and effectiveness of civil society consultation on the Bank's Country Strategies. The Bank's Civil Society Engagement Unit has been tasked with organising more extensive and direct consultation with civil society on the ground with the aim of proactively soliciting comments on the draft Country Strategies from the CSOs active in the country and those that closely follow the work of the Bank (See Page 24 *Relations with Civil Society*).

**Table 1: Website posting of Invitation to Comment on Country Strategies**

<b>Country</b>	<b>Date Posted</b>	<b>Posting ended</b>	<b>Comments received</b>
Bulgaria	1 August 2011	15 September 2011	Yes
Hungary	21 July 2011	5 September 2011	No
Latvia	1 August 2011	15 September 2011	No
Kyrgyz Republic	24 June 2011	7 August 2011	Yes
Ukraine	1 February 2011	17 March 2011	Yes

### **Strategy for Bulgaria**

The draft Strategy was posted on the Bank's website on 1 August 2011 with public comments requested by 15 September 2011. In the course of the Strategy preparation, the Bank organised a number of meetings with Bulgarian CSOs to seek their views on the operational environment in Bulgaria and to solicit proactively comments on the draft Strategy. CSOs commended the Bank for its current and planned support to small- and medium-sized enterprises and for its commitment to projects in energy efficiency. Among the recommendations were for the EBRD to continue the policy dialogue with the Bulgarian government regarding reforms to promote further liberalisation of the Bulgarian economy and to provide more assistance with judicial reform and improvements to insolvency legislation. Comments were also made regarding public-private partnership (PPP) financing and the EBRD's activities in the urban transport, power and energy and agribusiness sectors.

The Strategy was approved by the Board of Directors on 8 November 2011. The *Report on the Invitation to Comment*, which captures the key themes and views received during the consultation process, became an addendum to the Strategy and can be found on [www.ebrd.com/downloads/country/strategy/bulgaria\\_comments\\_111116.pdf](http://www.ebrd.com/downloads/country/strategy/bulgaria_comments_111116.pdf)

### **Strategy for Hungary**

The draft Strategy was posted on the Bank's website on 21 July 2011. The public was invited to submit comments by 5 September 2011. No comments were received during the public consultation period. The Strategy was approved on 11 October 2011 and posted on the Bank's website.

### **Strategy for Latvia**

The draft Strategy was posted on the Bank's website on 1 August 2011 with public comments requested by 15 September 2011. No comments on the draft Strategy were received during the public consultation period. The Strategy was approved on 27 October 2011 and posted on the Bank's website.

### **Strategy for Kyrgyz Republic**

The draft Strategy was posted on the Bank's website on 24 June 2011. The public was invited to submit comments on the draft by 7 August 2011. As a part of the consultation process, the Bank organised a dedicated consultation workshop in Bishkek with local civil society organisations with the aim of proactively soliciting feedback on the draft Strategy. Civil society organisations expressed their support for the proposed core operational priorities of the new Strategy and commended the Bank's efforts in stabilising the financial sector during the global economic crisis, and its proposed assistance to the most vulnerable socio-economic areas in the country through policy dialogue, technical assistance and commercial loans. CSOs provided feedback on a wide range of topics, including transparency in the energy sector and contractual procurement, transition challenges in public services and infrastructure as well as recommendations on the implementation of the Bank's specific investment projects.

As a result of the meeting, the Bank was able to compile a substantial *Report on the Invitation to Comment*, which is available on-line together with the final Country Strategy approved by the Board of Directors on 1 September 2011: [www.ebrd.com/downloads/country/strategy/kyrgyz\\_comments.pdf](http://www.ebrd.com/downloads/country/strategy/kyrgyz_comments.pdf)

### **Strategy for Ukraine**

The draft of Strategy was posted on the Bank's website on 1 February 2011 with public comments requested by 17 March 2011. Written comments were received from CEE Bankwatch Network and Creative Union "TORO" – Transparency International Contact Group in Ukraine. Recommendations to the Bank were provided in relation to its planned activities in energy, natural resources, MEI, transport, and manufacturing and services sectors. Comments were also made in relation to the Bank's financing through financial intermediaries, use of offshore jurisdictions and transparency of the privatisation process in Ukraine.

Public comments were examined by the relevant Banking teams and Management and responses were provided in the *Report on the Invitation to Comment*. This report became an addendum to Strategy, which was approved on 13 April 2011, and can be found on [www.ebrd.com/downloads/country/strategy/ukraine\\_comments\\_2011\\_2014.pdf](http://www.ebrd.com/downloads/country/strategy/ukraine_comments_2011_2014.pdf)

### ***Translation of Draft Country Strategies***

*"The Bank will translate each draft Country Strategy into the relevant official national language. In those countries where there is more than one official national language, and where one of those languages is a designated working language of the Bank, the translation will be provided only in such working language. Translated draft Country Strategies will not be considered official Bank documents as they are prepared only for the convenience of local communities and other interested parties. While the Bank cannot guarantee the accuracy and authenticity of any such translation, which will carry a disclaimer, every effort will be made to provide reliable translations. The translated draft Country Strategies will be made available in the relevant Resident Office and posted on the Bank's website."*

*“The translation of the draft Country Strategies into the relevant national language is not intended, and should not be seen, in any way to modify, alter or impact upon the Bank’s practice of working in the following four languages: English, French, German and Russian.”*

**Implementation:**

This requirement came into force on 1 November 2011. Only the draft Country Strategies, for which the preparation process started after 1 November 2011, will be translated into the relevant official national languages.

***Final Country Strategies***

**PIP requirements:**

*“After the Country Strategy has been approved, the Report on the Invitation to Comment, containing the summary of public comments received and staff responses will be publicly released and posted on the Bank’s website. While all comments received by the Bank during this exercise will be considered, and the senders acknowledged, the Bank will not respond to individual public comments or communications received.”*

**Implementation:**

In the period under review, the five country Strategies approved by the Board in 2011 were posted on the website as required by the PIP (see Table 2). In line with the Policy, a timetable for Strategy reviews in 2011 was also posted on the website at the beginning of the year and updated as appropriate.

At the time of the posting of the approved Strategies, the Civil Society Engagement Unit alerted CSOs in the relevant country, as well as all other CSOs in the Bank’s database, to the fact.

**Table 2: Approved Country Strategies posted on the website in 2011**

<b>Country</b>	<b>Date approved</b>	<b>Posted on website</b>
Bulgaria	8 November 2011	24 November 2011
Hungary	11 October 2011	24 November 2011
Latvia	11 October 2011	21 November 2011
Kyrgyz Republic	1 September 2011	15 September 2011
Ukraine	12/13 April 2011	22 April 2011

***Translation of Approved Country Strategies***

**PIP requirements:**

*“The Bank will translate each approved Country Strategy into the relevant official national language subject to the same terms set out in Section 2.1.2 above.”* (See Translation of Draft Country Strategies)

**Implementation:**

In this reporting period, the five approved Country Strategies (listed in Table 2 above) were translated into relevant official national languages.

At the time of the posting of the translated Strategies, the Civil Society Engagement Unit alerted CSOs in the relevant country, as well as all other relevant international CSOs in the Bank's database, to the fact.

## 2.2 Sectoral Strategies

The Bank develops Sectoral Strategies for its operations in the key business sectors in which it promotes transition. The object of the Sectoral Strategies is to provide an updated assessment of transition challenges as well as an indication of strategic priorities for banking operations in the relevant sectors. As appropriate, environmental and social information is included in summary format in such strategies.

### *Draft Sectoral Strategies*

#### **PIP requirements:**

*"The Bank will invite the public to provide input to the preparation of Sectoral Strategies on the basis of a draft Sectoral Strategy document.*

*"The draft Sectoral Strategy will be publicly released and posted on the Bank's website for a period of 45 calendar days, during which time the public is invited to send comments to the Bank.*

*"A summary of public comments received and staff responses will be made available to the Board of Directors in a Report on the Invitation to Comment before final approval by the Board of the Sectoral Strategy."*

#### **Implementation:**

No Sectoral Strategies were reviewed during 2011.

### *Final Sectoral Strategies*

#### **PIP requirements:**

*"After the Sectoral Strategy has been approved, the Report on the Invitation to Comment, containing the summary of public comments received and staff responses will be publicly released and posted on the Bank's website. While all comments received by the Bank during this exercise will be considered, and the senders acknowledged, the Bank will not respond to individual public comments or communications received.*

*"The following Sectoral Strategies currently provide guidance for the Bank's operations in the relevant sectors:*

- *Telecommunication, Informatics and Media*
- *Transport*
- *Property Operations*
- *Municipal and Environmental Infrastructure*
- *Energy Operations*
- *Shipping Operations*
- *Financial Sector Operations*
- *Agribusiness Operations*
- *Micro, Small and Medium-sized Enterprises*

*When additional Sectoral Strategies are developed the same treatment will apply for their release to the public."*

### **Implementation:**

No Sectoral Strategies were reviewed during 2011

## **2.3 Policies and procedures subject to public review**

### **PIP requirements:**

*“The Public Information Policy, Environmental and Social Policy, and the Project Complaint Mechanism are subject to periodic review. Draft texts will be posted on the Bank’s website for 45 calendar days of public comment. A summary of public comments received and staff responses will be made available to the Board of Directors in a Report on the Invitation to Comment before final approval by the Board.*

*“Following approval by the Board of Directors, the Report on the Invitation to Comment, containing the summary of public comments received and staff responses will be publicly released and posted on the Bank’s website. While all comments received by the Bank during this exercise will be considered, and the senders acknowledged, the Bank will not respond to individual public comments or communications received.*

*“The above consultation procedure does not apply to any other of the Bank’s other policies.*

*“The Bank will endeavour to provide translations of the Public Information Policy, the Environmental and Social Policy as well as its performance requirements, and the Project Complaint Mechanism, into a number of official national languages in the region on a demand-driven basis. Requests can be made for translations by clients, institutions, or civil society. While the Bank cannot guarantee the accuracy and authenticity of any such translation, which will carry a disclaimer, every effort will be made to provide reliable translations when need is demonstrated.”*

### **Implementation:**

#### ***Translation of the Public Information Policy***

So far the Bank has not received any requests for a translation into the relevant official language of any country of operations. However, a translation of the PIP has been made available in Russian on the Bank’s website.

#### ***Translation of the Environmental and Social Policy***

In 2011, the 2008 Environmental and Social Policy was translated into Macedonian, bringing to a total of 13 the number of translations into the official national languages of EBRD countries of operations. Further translation of the Policy into additional languages will be considered upon request of clients, organisations, or the public. Below are the currently available language versions of the policy:

- |              |                     |
|--------------|---------------------|
| · English*   | · Albanian          |
| · Bosnian    | · Bulgarian         |
| · Croatian   | · Georgian          |
| · Macedonian | · Mongolian         |
| · Polish     | · Romanian/Moldovan |
| · Serbian    | · Russian           |
| · Turkish    | · Ukrainian         |

\*Please note that the English language is the official text.

These translations are currently available on the Bank's website at <http://www.ebrd.com/pages/research/publications/policies/environmental.shtml>

## 2.4 Disclosure of other Strategies and Institutional Reviews

### **PIP requirements:**

*"The Bank's operations are guided by such documents as the five-yearly Capital Resources Review, the annual Medium Term Strategy Update, the annual Strategic Portfolio Review, and the annual Business Plan & Budget. Summaries of these documents will be made available on the Bank's website after Board approval of the main document. In addition, a summary of approved annual Staff Compensation and Benefits adjustments will be included as part of the summary of the annual Business Plan & Budget to be made available on the Bank's website.*

*"On-line archive of earlier strategies and policies*

*"The Bank will post in a dedicated website location earlier approved versions of strategies and policies as set out in sub-sections 2.1, 2.2 and 2.3.*

### **Implementation:**

The annual Business Plan and Budget Summaries for 2011 were posted in May 2011. The 2011 Strategic Implementation Review (previously the Strategic Portfolio Review), which is not prepared during the years in which a Capital Resources Review is undertaken, will be reviewed in 2012. The Medium Term Strategy Update is no longer prepared.

As regards the on-line archive, around 200 earlier approved versions of strategies and policies from 1991 have been posted since 1 November 2011. The on-line archiving will be a continuing process.

## 3. Project-related information

The Bank will inform the public of project development through Project Summary Documents (PSDs). At the same time, project sponsors and clients entrust confidential information to the Bank, which the Bank, as a financial institution promoting the development of the private sector, has an obligation to respect.

### 3.1 Project Summary Documents (PSDs)

#### **PIP requirements:**

*"A Project Summary Document (PSD) will be prepared for each private and public sector project where approval is sought from the Board of Directors. PSDs provide a factual summary of the main elements of a given project and potential investment which includes the following information: (i) the identity of the project company; (ii) total project cost (where applicable); (iii) the project location; (iv) a brief description of the project and its objective; (v) the amount and nature of EBRD's investment; (vi) the target date for a decision on the project by the Board of Directors; (vii) the anticipated transition impact; (viii) a summary of environmental and social issues; (ix) if applicable, details of project related technical co-operation funding and grant financing; and (x) guidance on how and where information about the project can be obtained, including contact points for the project sponsor and the EBRD Operation Leader.*

*"For projects where approval is not sought from the Board of Directors, but under delegated approval, a PSD will be prepared if there are significant environmental or social issues.*

*“Information considered confidential, as set out in Section E of the Policy, will be excluded from the PSD.*

*“For private sector projects, the PSD will be released at least 30 calendar days prior to consideration of the project by the Board of Directors, unless the Bank’s client or co-financing institution provides sound reasons for not releasing the document. In such cases, the PSD will be released as soon as possible and prior to any disbursement.*

*“For public sector projects, the PSD will be released as soon as possible after the project has passed its Concept Review by the Bank’s management, and at least 60 calendar days before Board discussion.*

*“PSDs are posted in three categories (date/country/sector) on the Bank’s website.*

*“Deferrals of the release of PSDs may be granted in certain circumstances, for example:*

- Capital market transactions (e.g. IPO, listed company or bond issue) where security laws, Stock Exchange regulations or other bodies restrict or prohibit distribution of information as per the PSD.*
- Legitimate sponsor concerns about confidentiality (as per Section E).*
- Likelihood of substantial changes in project design at Final Review.*

*“PSDs will be updated, if material changes as approved by the Board, are made to the project following the release of the original PSD.*

*“In order to make information available about the Bank’s operations in a given country, PSDs will, as soon as practicable after the posting of the English version, be translated into relevant official national languages and publicly released and posted on the Bank’s website. Translated PSDs will also be made available in the relevant Resident Offices. While the Bank cannot guarantee the accuracy of such translation, every effort will be made to provide reliable translations. PSD updates will also be translated into the relevant official national language.”*

**Implementation:**

In the period under review, 199 projects (135 private sector and 64 public sector) were prepared for Board consideration. All PSDs for both private and public sector projects were in compliance with the PIP during the period under review.

**Table 3: PSDs published 1 January - 31 December 2011**

<b>PSDs for Private sector projects</b>	<b>Number</b>
Compliant with policy	135
Deferrals in accordance with PIP *	36
Capital markets transaction (13)	
Legitimate sponsor concerns on confidentiality (20)	
Likelihood of substantial changes at Final Review (7)	
Non-compliant with PIP	0
<b>Total number of private sector PSDs</b>	<b>135</b>
<b>PSDs for Public sector projects</b>	
Compliant with policy	64
Deferrals in accordance with PIP *	3
Capital markets transaction (3)	
Legitimate sponsor concerns on confidentiality (1)	
Non-compliant with PIP	0
<b>Total number of public sector PSDs</b>	<b>64</b>

\* 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.

Each PSD reflects the state of EBRD financing on a particular project at the time of Board approval of the project, other than material changes in the financial structure of the project as approved by the Board. PSDs are not designed to provide further information or updates on the subsequent development of a project and, therefore, do not necessarily provide an up-to-date reflection of the subsequent state of EBRD investments.

Of the 135 private sector PSDs, there were 36 deferrals to the 30-day release timeframe, all of which were authorised within the terms of the Policy. There were three deferrals for public sector project PSDs.

In the reporting period from 1 January - 31 December 2011, 156 PSDs were translated into the relevant official national languages<sup>2</sup>. The following is the country breakdown:

Albania (2); Armenia (3); Azerbaijan (2); Belarus (3); Bosnia & Herzegovina (2); Bulgaria (2); Croatia (5); FYR Macedonia (3); Georgia (2); Kazakhstan (11); Kyrgyz Republic (5); Moldova (2); Mongolia (2); Montenegro (1); Poland (5); Romania (16); Russian Federation (49); Serbia (9); Tajikistan (3);

<sup>2</sup> Please note that PSDs for Regional Projects are not translated since they often relate to a wide geographical region and would require multiple translations many of which would not be relevant.

Turkey (14); Turkmenistan (1); Ukraine (14). There were 14 PSDs for regional projects that did not require translations. Translations of 29 PSDs remained outstanding at the end of the period under review.

### **3.2 Public Sector Projects**

#### **PIP requirements:**

*“Board Reports for public sector projects will be made available to the public on request, once the project has been approved by the Board of Directors. Information considered confidential, as set out in Section E of the Policy, will be removed from the released documents.”*

#### **Implementation:**

Three requests for the release of Public Sector Project Board reports were received during the period under review.

### **3.3 Cancelled, Rejected or Inactive Projects**

#### **PIP requirements:**

*“Project Summary Documents (PSDs) will be removed from the website as soon as the associated project is cancelled, rejected, or if inactive for a year. However, where a PSD is for a “Category A” project, with an associated Environmental and Social Impact Assessment, the PSD and all associated information on the website will be removed six months after the date on which it would otherwise have been removed. The Bank, however, may at its discretion, leave such PSDs on the website for a longer period.”*

#### **Implementation:**

Three PSDs were removed from the website during the period under review.

### **3.4 Environmental and Social Information relating to Projects**

#### **PIP requirements:**

*“For projects approved by the Board of Directors, the EBRD releases summary information on the environmental and social issues associated with its projects and the associated mitigation measures. The Bank may, at its discretion, disclose other environmental and social reports and studies that it commissions from time to time, for public comment or for information, on its website.*

*“The Bank will make available Environmental and Social Impact Assessments on “Category A” projects in its Headquarters in London and in the relevant EBRD Resident Office at least 60 calendar days prior to consideration of the project by the Board of Directors for private sector projects and 120 calendar days prior to Board consideration for public sector projects. For projects located in countries where EBRD does not have a Resident Office, alternative means of disclosure will be identified on the ESIA webpage for the project.*

*Notification of the documents’ availability will be posted on the EBRD website along with the non-technical summary of the Environmental and Social Impact Assessment and supporting consultation and action plans, as appropriate. The notification will also list locations of full availability of ESIA documents and link to the Client’s website or other website where full documentation is available during the consultation period.*

*“Environmental and social issues, including the categorisation of the project and planned mitigation measures will be summarised in Project Summary Documents.*

*“The disclosure of project information is the responsibility of clients. The EBRD requirements for disclosure of project information by the client are contained in the EBRD Environmental and Social Policy.*

*“Portfolio information on environmental and social issues is provided in the annual Sustainability Report.”*

### **Implementation Summary for 2011**

- A total of 26 “Category A” projects, requiring an environmental and social impact assessment, underwent disclosure in 2011.
- Thirteen of the 26 projects proceeded to Board Review and Approval. One project was cancelled prior to Board approval and one was cancelled following the Board approval. The remaining projects have not yet been scheduled for Board Review.
- Of the projects proceeding to Board, all projects met the requirement of 60 days minimum disclosure for Private Sector projects and 120 days minimum disclosure for public sector projects with the exception of the Western High Speed Diameter Central Section PPP project (WHSD) (see footnote on table 4 for explanation). This project was submitted to the Board of Directors with a request for a derogation on timing.
- All 26 projects were electronically available on the client’s website. The links are provided on the individual project’s ESIA web page (<http://www.ebrd.com/saf/search.html?type=eia>).
- In 2011, no requests were made to review ESIA’s in EBRD’s offices in London.

**Table 4: Summary of Category A Disclosure in 2010**

Country	Project Name	Sector	Date EIA HQ/RO	Board Date	Days available (before Board)	Language of ESIA
1. Albania	Fier and Vlore Bypass Roads (42319)	Public	20/07/11	22/11/11	126 days	Albanian
2. Armenia	Kotayak Solid Waste Management Project (39603)	Public	08/12/11	--	N/A	Armenian, English
3. Bosnia	Banja Luka-Doboj Motorway (41370)	Public	16/06/11	--	N/A	Serbian, English
4. Bosnia & Herzegovina	Plava Voda Regional Water Supply Project (42926)	Public	25/07/11	--	N/A	Bosnian, English
5. Bosnia & Herzegovina	Sarajevo Urban Roads Development Project (42889)	Public	13/05/11	11/10/11	152 days	Bosnian (some documents in English)
6. Croatia	Omla Hydropower Project (42219)	Public	25/05/11	22/11/11	182 days	Croatian and English
7. FYR Macedonia	Boskov Most Hydropower Project (41979)	Public	08/07/11	08/11/11	124 days	Macedonian (some documents in English)
8. FYR Macedonia	Corridor X Motorway (41981)	Public	08/12/10	13/04/11	127 days	Macedonian, English
9. Georgia	Paravani 38940 (Debt) 42249 (Equity)	Private	31/03/11	14/06/11	76 days	Georgian, some Russian
10. Kazakhstan	Heidelberg Caspi Cement Project (41796) <sup>3</sup>	Private	11/05/11	12/07/11	63 days	Russian and English
11. Kazakhstan	JSC Caustic Soda (39561)	Private	24/03/10	04/05/11	375 days	English, Russian
12. Mongolia	MAK II Tsagaan Suvarga (41547)	Private	06/10/11	06/12/11	62 days	Mongolian

<sup>3</sup> Project Heidelberg Caspi Cement cancelled post Board approval.

13. Montenegro	Lastva-Pljevlja Transmission Line (42768)	Public	22/12/11	N/A	--	Montenegrin
14. Poland	EC Stalowa Wola CCGT Project	Public	05/07/11	N/A	N/A	Polish
15. Poland	Martifer Polish Wind <sup>4</sup>	Private	08/01/10	N/A	N/A	Polish, English
16. Poland	Polskie LNG (40799)	Private	08/04/11	--	N/A	Polish, English
17. Romania	Pestera (EDPR) Wind Projects (41163)	Private	07/04/10	01/02/11	300 days	Romanian, English
18. Romania	EPGE (Chirnogeni) Wind Project (41993)	Private	25/10/11	--	N/A	Romanian, English
19. Romania	Vimetco Power (42243)	Private	28/12/11	--	N/A	Romanian, English
20. Russian Federation	Sibcement (40216)	Private	11/10/11	--	N/A	Russian (some doc in English)
21. Russian Federation	Western High Speed Diameter Central Section PPP Project—St Petersburg (43006)	Public	14/10/11	13/12/11	61 days <sup>5</sup>	Russian, English
22. Serbia	EPS Kolubara Environmental Improvement Programme (41923)	Public	03/03/11	26/07/11	146 days	Serbian, English
23. Turkey	Bares Wind Farm (42978)	Private	22/09/11	22/11/11	62 days	Turkish, English
24. Turkey	Eurasia Tunnel (42163)	Private	07/03/11	--	N/A	Turkish, English
25. Turkey	Kirikkale CCGT Project (42896)	Private	06/10/11	--	N/A	Turkish, English
26. Ukraine	Pan European Corridors-Zhytomyr Bypass (40185)	Public	12/08/11	Phase 1: 23/11/10 Phase 2: 2012	Phase 1 Cat. B. Phase 2 has Cat. A level component <sup>6</sup>	Ukrainian, English

<sup>4</sup> Project Martifer Polish Wind cancelled following disclosure but prior to Board review.

<sup>5</sup> The WHSD PPP project was considered private sector during due diligence and subject to a 60 day disclosure period. However, because the shareholders of the winning concessionaire were state-owned, the categorisation was changed prior to Board to be Public Sector, which meant that the disclosure requirement would have been 120 days. A derogation from the PIP was therefore requested from the Board on the disclosure timing.

<sup>6</sup> The Pan-European Corridors Project went to Board for first Phase approval as Category B project; however, one section in Phase 2 requires an ESIA and the ESIA and associated consultation were conditions of investment in Phase 2. The ESIA was disclosed in August 2011 when the Phase 2 component was clarified and will be re-submitted to Board for approval in early 2012. The minimum number of disclosure days (120) for the Phase 2 component was met on 9 December 2011.

#### **4. Accountability and governance related information**

In order to strengthen the Bank's corporate governance, the following information will be disclosed and posted on the Bank's website.

##### **4.1 Compliance documentation**

###### **List of ineligible entities**

###### **PIP requirements:**

*"The Bank will post on its internet site a list of persons and or entities subject to Debarment or Debarment with Conditional Release or a Notice of Mutual Enforcement pursuant to the Bank's Enforcement Policy and Procedures. The posting shall remain on the site for as long as the Debarment or Mutual Enforcement remains in effect."*

###### **Implementation:**

Following signature of the Agreement for Mutual Enforcement of the Debarment Decisions by the Bank alongside the African Development Bank Group, the Asian Development Bank (the "ADB"), the Inter-American Development Bank Group and the World Bank Group on 9 April 2010 (available at <http://www.ebrd.com/downloads/integrity/Debar.pdf>) and its entry into force for the Bank and ADB as from 9 June 2010 and for the World Bank Group as from 20 July 2010, in 2011 the Bank cross debarred thirty six (36) entities and twenty three (23) individuals based on thirty six (36) debarment notices received from the World Bank and twenty three (23) notices received from the Asian Development Bank.

In addition, in July 2011, the Bank completed the first proceedings instituted under its Enforcement Policy and Procedures (EPPs), in force since May 2009, resulting in the debarment of two entities and their affiliates.

The list of all EBRD debarred entities and individuals can be found at <http://www.ebrd.com/pages/about/integrity/list.shtml>

###### **Anti-Corruption Reports**

###### **PIP requirements:**

*"The Bank's Anti-Corruption Report, published annually by the Office of the Chief Compliance Officers, will be publicly released and posted on the Bank's internet site."*

###### **Implementation:**

The Anti-Corruption Update Report for the year 2010 was released and posted on the Bank's Website in May 2011 and can be found at <http://www.ebrd.com/downloads/integrity/ACReport10.pdf>

## **Project Complaint Mechanism (PCM)**

### **PIP requirements:**

*“The following information and/or documents will be publicly released and posted on the Bank’s website.*

- *the PCM Rules of Procedure;*
- *PCM Annual Reports;*
- *copy of complaints received, once registered in accordance with the PCM Rules of Procedure;*
- *Eligibility Assessment Reports, subject to the conditions set out in the PCM Rules of Procedure;*
- *Problem-solving Competition Reports or summaries thereof, subject to the conditions set out in the PCM Rules of Procedure, and related Problem-solving Initiative Monitoring Reports, if any;*
- *Compliance Review Reports, Management Action Plans, Complainant Comments, and related Compliance Review Monitoring Reports, if any*
- *information regarding each of the PCM experts, and*
- *information brochures and pamphlets about the PCM.”*

### **Implementation:**

The Rules of Procedure of the PCM were approved by the EBRD Board of Directors in May 2009 and can be found in English at <http://www.ebrd.com/downloads/integrity/pcmrules.pdf> and in Russian at <http://www.ebrd.com/downloads/integrity/pcmrulesr.pdf>. In addition, a PCM information leaflet was published in September 2010 and posted on the PCM webpage in early October 2010 and can be found in English and Russian at <http://www.ebrd.com/downloads/integrity/pcm.pdf> and <http://www.ebrd.com/downloads/integrity/pcmr.pdf>, respectively. Sample Complaint Forms were posted on the PCM webpage in English in November 2010 and in Russian in December 2010 and can be found at [http://www.ebrd.com/downloads/integrity/sample\\_complaint\\_form.pdf](http://www.ebrd.com/downloads/integrity/sample_complaint_form.pdf) and [http://www.ebrd.com/downloads/integrity/sample\\_complaint\\_form\\_russian.pdf](http://www.ebrd.com/downloads/integrity/sample_complaint_form_russian.pdf) respectively.

The second PCM Annual Report, covering the period 1 January – 29 December 2011 was posted on the Bank’s website in April 2012 and can be found at: <http://www.ebrd.com/pages/project/pcm.shtml>.

In the course of the year, the PCM completed its compliance review in relation to the D1 Motorway Project in the Slovak Republic, complaint received in June 2010, focusing on an alleged failure of the Bank to properly assess the project’s potential impact on protected Natura sites. This was the first compliance review to be completed since the PCM replaced the former Independent Review Mechanism in March 2010. The compliance review, undertaken by an independent expert from the Bank’s PCM panel, concluded that no non-compliance had occurred. The Bank’s full report was published in May 2011 and is available at:

[http://www.ebrd.com/downloads/integrity/Compliance\\_Review\\_Report\\_D1\\_Slovakia\\_FINAL.pdf](http://www.ebrd.com/downloads/integrity/Compliance_Review_Report_D1_Slovakia_FINAL.pdf)

The PCM registered six (6) new complaints during 2011; four concerned the Tbilisi Railway Bypass project and were assessed as being eligible for compliance review and /or problem-solving. As the project was subsequently cancelled for unrelated reasons, the problem-solving initiatives were terminated but the compliance review was still in process at year end. The remaining two (2) complaints concern hydropower projects in Croatia and Macedonia and were still subject to eligibility assessment at year end. Details of the registration of all of the foregoing complaints as well as the Eligibility Assessment Reports in relation to the Tbilisi Railway Bypass complaints can be found at <http://www.ebrd.com/pages/project/pcm/register.shtml>.

Information regarding the current roster of PCM Experts was posted in June 2010 and can be found at <http://www.ebrd.com/pages/project/pcm/experts.shtml>

## 4.2 Evaluation documentation

### **PIP requirements:**

*“Subject to clearance in respect of commercial confidentiality (a process steered by the Evaluation Department (EvD)), certain evaluation reports prepared by EvD will be publicly released and posted on the Bank’s website.*

*“The following documents will be disclosed:*

- *summaries of Operational Performance Evaluation Review (OPER) on investment operations;*
- *Evaluation Special Studies, on themes such as sectors and programmes;*
- *OPER reports on TC operations;*
- *the Final Work Programme of EvD and the Work Programme Completion Report;*
- *the Annual Evaluation Overview Report (AEOR); and*
- *the Evaluation Policy*

*“In respect of OPER reports on investment operations, where project particulars in high profile projects cannot be easily disguised in order to preserve confidentiality, an exception will be made and a summary of the report will not be disclosed.*

*“Prior to the disclosure of any evaluation report EvD will consult the respective staff in the Banking Department and the Office of the General Counsel (OGC) to screen reports in order to secure necessary commercial confidentiality.*

*“The comments from management in respect of any of the foregoing documents (summaries and reports etc.) are publicly released and posted in full on the Bank’s website at the same time as the document to which they relate. The document is also edited in order to avoid identification of client companies and to preserve commercial confidentiality.*

*“Although the Board of Directors is kept informed about the findings of EvD reports and discusses details in the Audit Committee, it is the responsibility of the EvD to determine what is contained in the reports it releases to the public. This is necessary to ensure that EvD is able to fulfil its important independent evaluation role in the Bank and provide lessons learned.”*

### **Implementation:**

The following EvD documents subject to the conditions set out in the PIP were posted on the Bank’s website in 2011:

### **OPER Summaries:**

Detsky Mir (Russia)  
Cantik Loan (Crisis Response) (Ukraine)  
ETC Non-Bank MFI Framework  
Astarta / II (Ukraine)  
Viro (Croatia)  
Braeside (Ukraine)

### **Technical Cooperation OPERS**

Forestry Study (Romania)  
Volzhski Water Project (Russia)  
Tajik Agricultural Finance Facility  
EU/EBRD SME Facility

### **Special Studies**

Sustainable Energy Initiative  
Leasing Policy  
PCR Assessment Report  
EBRD Shareholder Special Fund  
Russian Regional Banks  
Small Business Finance Operations Policy

### **Key Evaluation Documents**

Evaluation Department Work Programme Final Report for 2011  
Evaluation Department Work Programme Completion Report for 2010  
Annual Evaluation Overview Report 2010  
Update of the Evaluation Policy 2010

All of the web postings followed internal circulation.

## **4.3 Other documentation**

### ***Annual Sustainability Report***

#### **PIP requirements:**

*“An annual Report on the implementation of the Environmental and Social Policy, will be publicly released and posted, in English and Russian, on the Bank’s website.*

*In addition, summaries of the meeting of the Bank’s Environmental and Social Advisory Council will be publicly released and posted on the Bank’s website in English, following the approval of the summary by the Council.”*

**Implementation:**

The Bank issued its *2010 Sustainability Report* at the Bank's Annual Meeting in May 2011. The 2010 Report covers a wide range of EBRD investments and achievements and these include the Bank's Sustainable Energy Initiative, investment in municipal infrastructure, micro and small business finance and donor support. The Report also looks at the way in which the EBRD operates and how the Bank engages with its stakeholders. The 2010 Sustainability Report in English is posted on Bank's website at <http://www.ebrd.com/downloads/research/sustain/sr10e.pdf> and in Russian at <http://www.ebrd.com/russian/downloads/research/sustain/sr10r.pdf>.

***Annual Procurement Review*****PIP requirements:**

*"An annual review, subject to the removal of confidential material, will be publicly released and posted on the Bank's website."*

**Implementation*****Annual Procurement Review***

The Annual Procurement Review 2010 was published on the Bank's website in July 2011.

***Annual Report on Engagement of Consultants by EBRD*****PIP requirements:**

*"An annual report, subject to the removal of confidential material, will be publicly released and posted on the Bank's website."*

**Implementation:**

In July 2011 the Annual Report on Engagement of Consultants by EBRD in 2010 was posted on the Bank's website at <http://www.ebrd.com/pages/workingwithus/procurement/consultancy.shtml>

***Annual Purchasing (Corporate Procurement) Review*****PIP requirements:**

*"An annual review, subject to the removal of confidential material, will be publicly released and posted on the Bank's website."*

**Implementation:**

The 2010 Annual Corporate Procurement Review was posted on the Bank's website on 8 September 2011 at <http://www.ebrd.com/pages/workingwithus/procurement/corporate.shtml>

## ***Public Information Policy: Reports on implementation***

### **PIP requirements:**

*“The Secretary General will report to the Board on implementation of the Policy on an annual (calendar year) basis and such reports, in English and Russian, will be publicly released and posted on the Bank’s website.”*

### **Implementation:**

The PIP Implementation Report for 2010 was presented to the Financial and Operations Policies Committee (FOPC) on 11 April 2011 and posted on the Bank’s website in the same month.

## ***Annual Financial Report***

### **PIP requirements:**

*“The Annual Financial Review, which forms part of the Bank’s Annual Report, will be publicly released and posted on the Bank’s website, in conjunction with the Annual Report.”*

### **Implementation:**

The Annual Financial Report was posted on the Bank’s website in May 2011.

## **5. Information considered confidential (Section E of the PIP)**

Section E of the PIP states that certain information considered confidential will not be disclosed. It includes categories of information that are considered confidential.

Out of the 68 PIP-related requests for information received by the Communications Department, only two were not answered positively and three more replies were positive only partially due to confidentiality reasons; and the tone of response of 26 answers could not be identified.

## **6. Implementation and monitoring of the Public Information Policy (Section F of the PIP)**

*“The Secretary General, advised as necessary by the General Counsel and other Members of the Executive Committee, will oversee and verify compliance with the Policy. .... The Secretary General will report to the Board on implementation of the Policy on an annual (calendar year) basis and the Report will be publicly released and posted on the Bank’s website.”*

### **Implementation:**

The Secretary General reported to the Board (Financial and Operations Policies Committee) on implementation of the Policy on 11 April 2011. The report was posted on the Bank’s website in June 2011.

### ***Relations with civil society***

*“The Bank has a dedicated contact point for communications with civil society and other stakeholders. The Bank endeavours to respond, as appropriate, and after consultation with relevant parties, to reasonable requests for information on other aspects of the Bank’s work, subject to the clarifications regarding confidential information set out in Part E of the Policy.”*

### **Implementation:**

In 2011, the EBRD continued to encourage civil society stakeholders to engage with the Bank in relation to its investment projects, sectoral and country strategies, and policies by providing relevant information and introducing new measures to strengthen the quality and effectiveness of civil society consultations.

The EBRD, via the Civil Society Engagement Unit, regularly informed civil society organisations (CSOs) about the latest developments in the Bank of interest to civil society through a variety of means, including dedicated webpages for civil society on its website, a quarterly EBRD-CSO Newsletter (available in English and Russian) and targeted email notifications and alerts.

In line with the PIP, relevant CSOs that had requested to become part of the Bank’s CSO database were notified about the start of consultation period for Category A projects and were invited to provide their comments on the Environmental and Social Impact Assessments (ESIAs) to the Bank and its clients.

In 2011, the EBRD invited public comments on five draft Country Strategies in accordance with the PIP. In addition to the standard practice, a number of important changes have been introduced by the Bank to further promote local stakeholders involvement in discussions regarding a new country strategies. Firstly, the revised PIP, which came into force on 1 November 2011, incorporates the new provision for translation of draft country strategies into the relevant official national languages. This provision will enable local, grass root CSOs to familiarise themselves with the EBRD’s operational priorities in the countries of operations and provide their feedback on the country strategies.

To further strengthen the Bank’s country strategy consultation practice, the Civil Society Engagement Unit has taken responsibility for organising dedicated consultation workshops, whenever possible, in the Bank’s countries of operations with civil society organisations that are interested in the work of the EBRD.

In 2011, the consultation workshops were held in Bishkek and Sofia to discuss the EBRD’s operational priorities in the Kyrgyz Republic and Bulgaria for the next three years. As a result of the meetings, the draft texts of the Strategies were amended to reflect comments where appropriate and substantial reports on public comments were prepared and presented to the EBRD Board of Directors alongside the final country strategies for the Kyrgyz Republic and Bulgaria.

The EBRD has also started to provide periodic updates to CSOs on the selected country strategies. In February, the EBRD's Ulaanbaatar Resident Office organised an information session for civil society to provide a mid-term update on the activities of the EBRD in Mongolia since the adoption of the EBRD's (second) three year strategy in October 2009. In March, the EBRD also provided annual update to CSOs on the Bank's calibrated approach to country strategies for Belarus and Turkmenistan.

The constructive dialogue with civil society organisations during a scheduled review of the 2008 Public Information Policy helped the EBRD to assess the public expectations in relation to the key aspects of the PIP and informed the Bank's policy decision-making from the perspective of CSOs with regard to the Bank's standards in stakeholder engagement and information disclosure and potential areas for improvement. The issues brought up by CSOs included the need for a more integrated approach by the Bank to public participation in the implementation of the Bank's projects, disclosure of environmental and social information and effective project monitoring.

Civil society engagement has also formed an important element in the Bank's wider preparations for expansion into its new countries of operations in the southern and eastern Mediterranean (SEMED) region. Initial steps taken by the Bank in 2011 included a September meeting in London between senior Bank officials and representatives of leading international CSOs. This discussion was hosted by the Bank's President, Thomas Mirow, and provided a valuable forum for an exchange of views on key issues of concern in SEMED; the Bank's potential role in the region and lessons learned from the Bank's current operations that apply to the new region, as seen by civil society stakeholders. Also, on the ground in Egypt, Morocco, Tunisia and Jordan, EBRD senior management engaged with local and international civil society stakeholders, including NGOs, bloggers, youth activists, academics and think-tanks to better understand the evolving political and economic situation including human rights issues.

In May, around 70 civil society representatives from 15 countries attended the Civil Society Programme held in parallel with the Annual Meeting of the Board of Governors and the Business Forum in Astana. The two-day programme included a special discussion panel on the results of the EBRD's Life in Transition Survey and a number of consultation sessions with the Bank's staff, senior management, the President and the Board of Directors.

Among the topics discussed at the Civil Society Programme were the political developments in Central Asia; potential implications of the EBRD's expansion to the SEMED region; energy security in the Bank's countries of operations and the Bank's role in the Extractive Industries Transparency Initiative (EITI) implementation; issues of transparency and public participation in the context of the project approval process; EBRD investments in natural resources, heavy industries, sustainable energy and other sectors; and EBRD policies such as the Public Information Policy and Project Complaint Mechanism.

In 2011, the EBRD's Board of Directors undertook Board Consultation Visits (BCVs) to Armenia, Mongolia, Serbia, Turkey and Russia. In each country the Directors met representatives of civil society as part of their regular series of consultations to keep up to date with developments in the EBRD's countries of operations.

Meetings with local civil society stakeholders were also organised during the visits of the Bank's senior officials to Bulgaria, FYR Macedonia and Montenegro.

## **7. Implementing procedural provisions for information requests and appeals (Annex to the PIP)**

### **PIP requirements:**

*"The Secretary General will issue implementing procedural provisions for information requests and appeals and, in the event of a decision to refuse the release of information will, as appropriate, inform the Board."*

The Policy also specifies that in the annual *Public Information Policy: Report on Implementation*, which is posted on the EBRD website, the Bank will report on its handling of requests and will provide a record of responses.

An Annex to the PIP sets out implementing procedural provisions for information requests and appeals.

### **Implementation:**

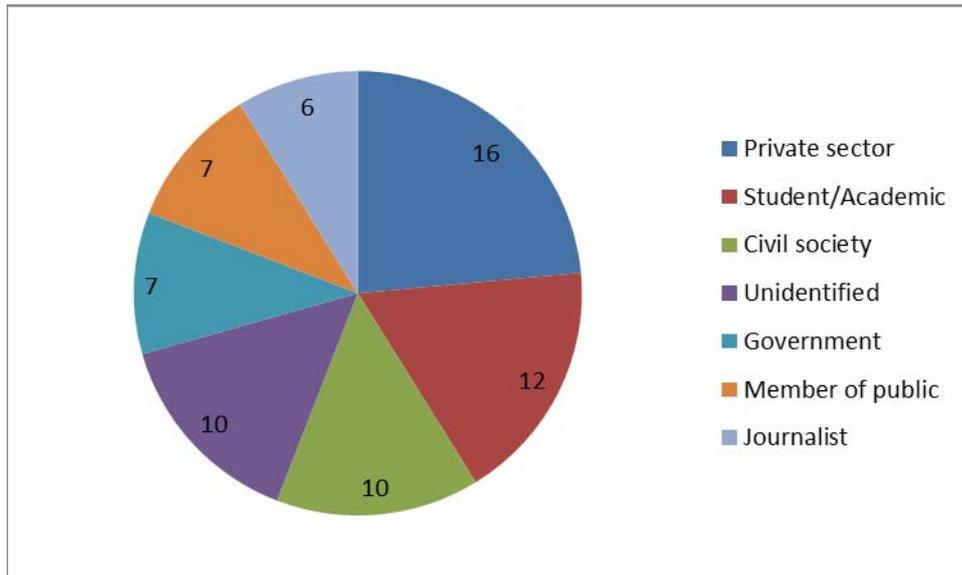
#### ***Handling Information Requests***

The handling of the information requests was consistent with the Implementing Procedural Provisions for public information requests. The Bank fulfilled obligations regarding responses and timeframes of responses to information request.

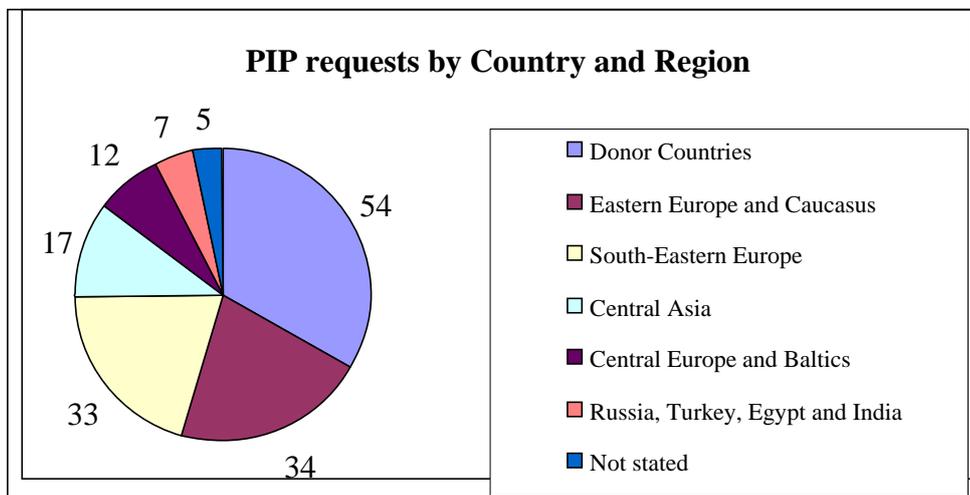
In 2011, the Communications Department coordinated responses to 344 different items of correspondence (7 requests that came to [Communications@EBRD.com](mailto:Communications@EBRD.com); 3 requests that came to [Press@EBRD.com](mailto:Press@EBRD.com); the rest – 334 requests – were received via the Bank's on-line information request form) and logged.

Out of the 344 requests, 68 were related to the Public Information Policy, including 13 requests for documents (6 Project Related Info, 3 Policy & Strategy, 2 General Institution Info, 1 Accountability & Governance, 1 Other); 50 requests for other information (18 General Institution Info, 11 Project Related Info, 7 Policy & Strategy, 2 Seeking Project Finance, 1 Accountability & Governance, 11 unidentified); and 5 other requests (2 Policy & Strategy, 1 General Institution Info, 1 Project Related Info, 1 unidentified).

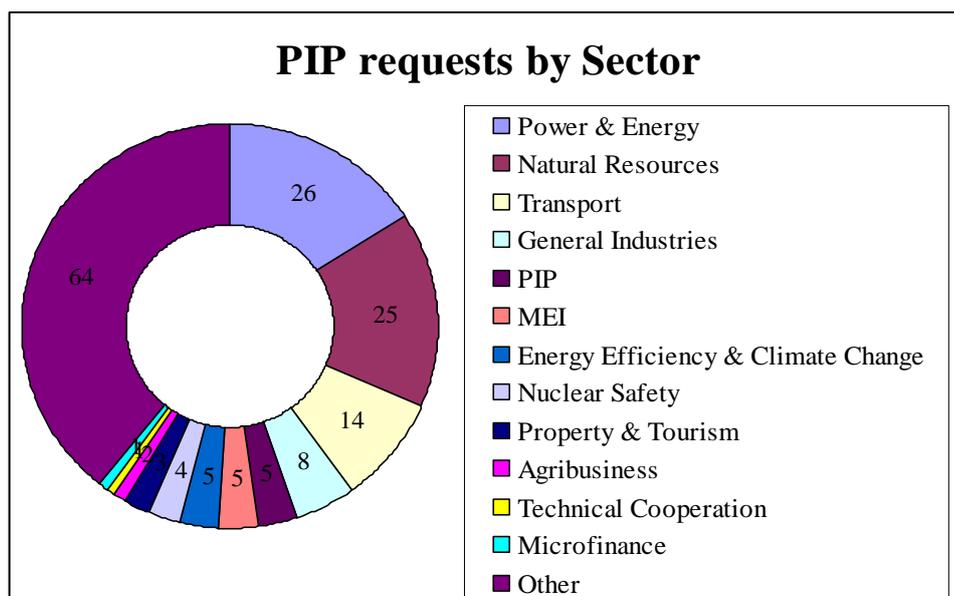
All PIP-related requests came from the following senders: 16 from private sector, 12 from students/academics, 10 from civil society, 10 from unidentified senders, 7 from government, 7 from members of public, 6 from journalists.



In geographic terms the main sources of requests were the following countries: the USA with 7 requests; the UK with 6 requests; Czech Republic with 5 requests; Ukraine and The Netherlands with 4 requests each. Canada and Germany have filed 3 requests each. Australia, Belgium, France, Georgia, Israel, Kyrgyz Republic, Sweden, Poland and Russia filed 2 requests each. Albania, Egypt, Estonia, Ireland, India, Hungary, Italy, Kazakhstan, Latvia, Portugal, Serbia, Romania and Turkey have filed 1 request each. Country origin of 5 more requests is unidentified.



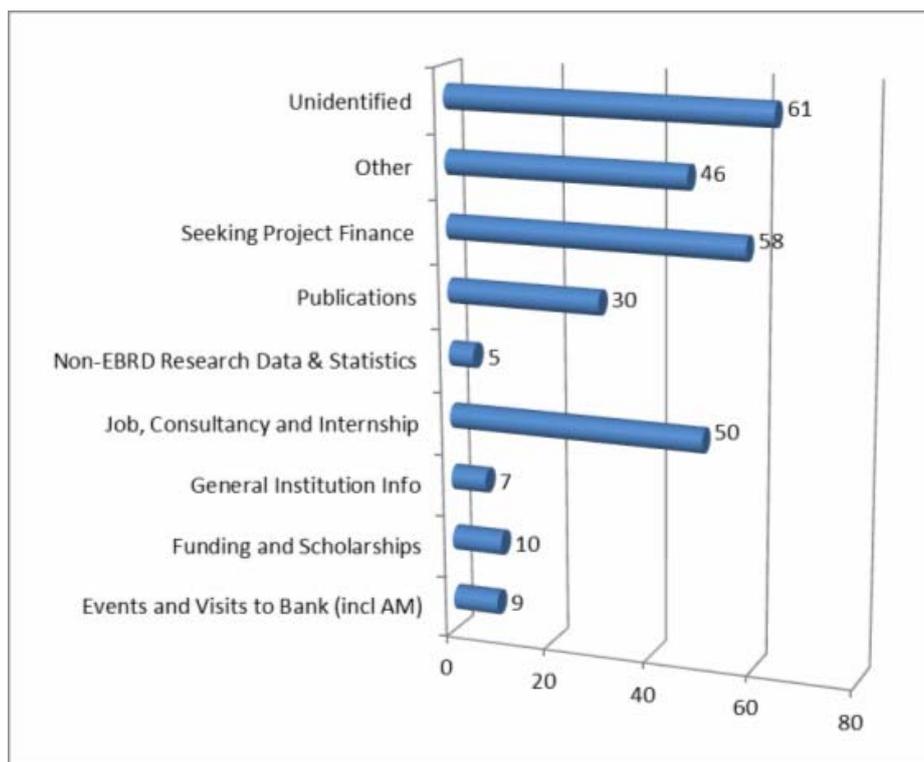
With regard to the project-related correspondence, the major sectors of interest were Power and Energy with 16 % of requests (26 requests), Natural Resources with 15 % of requests (25 requests) and Transport with 9 % of requests (14 requests).



Only 3 PIP-related requests were not responded to inside the stipulated timeframe of 20 working days, mainly due to the fact that relevant staff responsible for preparing responses were travelling for extensive periods of time. In each case a timely explanation for a further delay was provided.

The rest of correspondence received and responded to – 276 items - was of general non-PIP related nature. These were covering the following subjects:

- Seeking Project Finance – 58 requests;
- Job, Consultancy and Internship – 50 requests;
- Publications – 30;
- Funding and Scholarships – 10 requests;
- Events and Visits to Bank (including the AM) – 9 requests;
- General Institution Info – 7 requests;
- Non-EBRD Research Data & Statistics – 5 requests;
- Procurement & Purchasing – 3 requests;
- Media – 2 requests;
- Other – 41 requests; unidentified – 61 requests.



The number of information requests and responses covered in this section reflects only the limited amount of correspondence received by the Bank either via the information request on-line form or forwarded to the Civil Society Engagement Unit and Communications Department by various EBRD teams for the coordination of responses. It does not reflect the total amount of correspondence which the EBRD conducts with external audiences.

#### ***Enhancing access to the Bank's website***

*"In recognition of the importance of the EBRD website ([www.ebrd.com](http://www.ebrd.com)) in communicating information to stakeholders and the general public, the Bank will continue to enhance access to the site and to the information posted on it. The Bank will also continue to explore ways in which more country specific information can be translated for posting on the website."*

#### **Implementation:**

In 2010, the Communications and IT departments launched a redesigned EBRD website. As one of the Bank's principal channels of communication, the new website aims to enhance the EBRD's visibility, encourage policy dialogue and generate business and investment opportunities. In particular, the site features improved navigation, access and information availability in English and Russian.

Extensive audience testing took place after the new site was launched, and test subjects unanimously praised the improved user-friendliness of the new site in comparison to the old one. Many commented specifically on how easy it was to navigate to key information about corporate governance and our transparency commitments.

High-visibility parts of the site, such as the homepage and footer (which appears on every single page), now contain more direct and prominent links to key pages such as "reporting fraud and corruption". Ongoing discussions with the Communications department will look at further ways to guide audiences quickly and easily to key PIP-related content.

Work continues to develop further and to improve the site. Among additional technical improvements under consideration are increased language functionality and new availability of templates (i.e. different page layouts) which will make it more feasible to develop a higher number of sections and resources relevant to the Bank's Resident Offices and their clients across the EBRD's countries of operations.

***Appeals to the Secretary General against Information Request Refusals***

No requests for information resulted in the requester invoking the right of appeal to the Secretary General.