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

**PUBLIC INFORMATION POLICY
IMPLEMENTATION REPORT 2016**

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PUBLIC INFORMATION POLICY IMPLEMENTATION REPORT 2016

EXECUTIVE SUMMARY

The Public Information Policy (PIP) establishes 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 strategies, policies and operations. The PIP can be found here: <http://www.ebrd.com/what-we-do/strategies-and-policies/public-information-policy.html>

The PIP requires an annual report to the Board of Directors on its implementation which is published on the Bank’s website. This report covers the period from 1 January to 31 December 2016.

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

Highlights in 2016

In 2016, the Bank:

- was in **compliance with the PIP except for** late disclosure of a Public Sector Board Report and late disclosure of one Project Summary Document, and
- **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. In addition, 32 PSDs for Category B projects attached Non-Technical Summaries (up from 3 in 2015).

After starting to report its activity to the **International Aid Transparency Initiative (IATI)** platform in May 2015, the Bank expanded its submissions during 2016 to include a number of new indicators such as information on sovereign disbursements and links to Project Summary Documents on ebrd.com. As a result, the NGO Publish What You Fund (PWYF) recognised the EBRD’s efforts and commitment to transparency in its 2016 Index (<http://ati.publishwhatyoufund.org/donor/ebrd/>) with a rating of 49.7%, almost double the previous index score for the Bank. PWYF also made a number of recommendations in its review of the EBRD’s transparency including an increase in the frequency of publication to the IATI platform and the inclusion of project impact and results in the IATI publication. The Bank started to submit to the IATI platform on a monthly basis from end-Q3 in 2016 and is actively working on PWYF’s other recommendations.

The **PCM’s first complaint** on the **PIP** was registered in February 2016. The complaint related to non-compliance with implementing the PIP timelines to disclose a Public Sector Board Report that was requested in October 2015. This eligible complaint is awaiting a Compliance Review Report and can be found here: <http://www.ebrd.com/work-with-us/project-finance/project-complaint-mechanism/pcm-register.html>. The Bank has taken steps 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.

1. INSTITUTIONAL INFORMATION

1.1 Schedule of forthcoming Board discussions &

1.2 List of forthcoming strategy and policy reviews and updates

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.

1.3 Board minutes

The minutes of 25 Board Meetings held in 2016 were posted on-line after approval of these minutes by the Board. Minutes were published for the following Board meetings: 13 and 27 January; 10 and 24 February; 9 and 23 March; 6 and 20 April; 4 and 25 May; 8, 22 and 24 June; 6 and 19/20 July; 7, 21 and 27 September; 4 and 19 October; 2, 16 and 30 November; 2 and 14/15 December.

1.4 Board Committees

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

1.5 Organigram of the Bank

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

1.6 Salaries of senior management and Directors

This information is contained in the 2015 Annual Financial Report, which was published on-line in 2016.

1.7 Administrative Tribunal

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

2. INFORMATION ON STRATEGIES AND POLICIES

2.1 Country strategies

In 2016, six 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. Overall, nine Country Strategies were approved. A summary of public comments received was made available to the Board of Directors prior to final Board approval of the relevant Country Strategy.

The Country Strategies approved by the Board in 2016 were posted on-line with the reports on the public's comments (see **Table 1**).

Table 1: Draft, Board approved & Translated Country Strategies in 2016

Country	Dates of public consultation	Board approval 2016	Posted on ebrd.com (translated version date in brackets if later)
Albania	6 Nov 2015 – 14 Dec 2015	13 January	19 January 2016
Estonia	3 Dec 2015 – 18 Jan 2016	10 February	23 February 2016
Latvia	3 Dec 2015 – 18 Jan 2016	10 February	23 February 2016
Lithuania	3 Dec 2015 – 18 Jan 2016	10 February	23 February 2016 (1 March 2016)
Hungary	12 Jan 2015 – 29 Feb 2016	23 March	11 April 2016 (19 April 2016)
Greece	25 April 2016 – 6 June 2016	22 June	23 June 2016
Belarus	24 June 2016 – 8 Aug 2016	7 September	12 September 2016
Kosovo	29 July 2016 – 12 Sep 2016	4 October	12 October 2016
Georgia	2 Aug 2016 – 16 Sep 2016	14 December	16 December 2016
Egypt*	9 Dec 2016 – 23 Jan 2017		

* This strategy was Board approved on 8 February 2017 and will be included in the PIP Implementation Report 2017.

2.2 Sector strategies and policies

The **Financial Sector Strategy 2016-2020** was Board approved on 13 January 2016 and published on ebrd.com.

2.3 Governance policies subject to public review

The Environmental and Social Policy, Public Information Policy, Evaluation Policy and the Project Complaint Mechanism are being implemented and will be reviewed in 2019.

2.4 Disclosure of other strategies and institutional reviews

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

2.5 On-line archive of earlier strategies and policies

The on-line archiving of strategies and policies continued throughout 2016.

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 6555 subscribers in 2015. In 2016 this increased to 7255 subscribers. The ebrd.com page on PSDs is the most viewed page on the website and had a total of 699,927 page views.

3.1 Project Summary Documents (PSDs)

In 2016, 208 projects (164 private sector and 44 public sector) were prepared for Board consideration. With one exception, all of these were compliant with the PIP:

Non-compliant PSD: Regional: Isbank – TurSEFF III (private sector project) – PSD was released 16 days before Board (rather than 30) due to a timing error by the team and further delays awaiting Press Office review.

Table 2: PSDs published 1 January - 31 December 2016

PSDs for Private sector projects	Number
Compliant with policy	163
Non-compliant with PIP	1
Total number of private sector PSDs	164
Deferrals in accordance with PIP *	45
Capital markets transaction	34
Legitimate sponsor concerns on confidentiality	19
Likelihood of substantial changes at Final Review	5
PSDs for Public sector projects	
Compliant with policy	44
Non-compliant with PIP	0
Total number of public sector PSDs	44
Deferrals in accordance with PIP	2
Capital markets transaction	1
Legitimate sponsor concerns on confidentiality	1
Likelihood of substantial changes at Final Review	0
Other	
Total number of non-transactional Technical Cooperation PSDs over €300,000 (section 3.1.6)	62
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.

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

Of the 164 private sector PSDs, there were 45 deferrals to the 30-day release timeframe, all of which were authorised within the terms of the PIP.

Of the 44 public sector PSDs, there were 2 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 2016, **194** PSDs were translated into the relevant official national languages.

There were **14** PSDs for regional projects that did not require translations. No translations remained outstanding at the end of the period under review.

3.2 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.

A request was made for disclosure of the Board Report for the EPS Restructuring project in Serbia (www.ebrd.com/work-with-us/projects/psd/eps-restructuring.html) on 29 October 2015. The Bank provided the redacted Board Report on the project on 29 February 2016 which failed to meet the 40 working day requirement of the implementing provisions of the PIP (Annex, section 2. (vi)). The delay was caused by the separation of confidential information which took longer than expected due to assessing potential confidentiality issues with many stakeholders.

As set out in the Executive Summary, there is an on-going PCM eligible complaint that is awaiting a Compliance Review Report and which can be found here: <http://www.ebrd.com/work-with-us/project-finance/project-complaint-mechanism/pcm-register.html>.

Whilst this process is on-going, the Bank strengthened internal processes to make sure the timelines as set out in the PIP for responding to these requests are met. These steps resulted in the Bank responding to all six requests received in 2016 well within the timelines as set out in the PIP.

Table 3: Requests for Public sector Board reports over the past 5 years

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

3.4 Environmental and social information relating to projects

A total of 18 new Category A projects requiring an Environmental and Social Impact Assessment (ESIA) were in an active disclosure period during 2016.

Eleven of the projects proceeded to the Board of Directors for review and approval; 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 proceeding to the Board of Directors, all projects met the requirement of 60 days minimum disclosure for private sector projects or 120 minimum disclosure for public sector projects prior to the Board of Director's consideration of the project.

Full ESIA disclosure packages for all projects were available in local languages and were disclosed electronically. Links were provided to each project's ESIA on ebrd.com and on the client's website. PSDs are also cross-linked with ESIA for Category A projects.

In 2016, PSDs for Category A and Category B projects were reviewed and the environmental and social content enhanced. 32 PSDs for Category B projects attached Non-Technical Summaries, up from 3 in 2015. Other PSDs for Category B projects had their environmental and social sections expanded providing enhanced information.

PSDs were published for 15 projects approved under delegated approval 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 2015 Annual Sustainability Report launched during the EBRD Annual Meeting on 12 May 2016: <http://www.ebrd.com/news/publications/sustainability-report/sustainability-report-2015.html>

Table 4: Summary of Category A Disclosure/Board Review in 2016

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
Turkey	Zorlu – Kizildere III GPP Extension	Private	08/12/2016	Not yet scheduled	--	Turkish and English
Jordan	Hussein Thermal Power Station Repowering	Private	18/07/2016	19/10/2016	94 days	Arabic and English
Kazakhstan	Shalkiya Zinc: Pre-Privatization Loan	Public	13/07/2016	Not yet scheduled	--	Russian and English
Azerbaijan	Roads Reconstruction and Upgrading Project	Public	26/05/2016	30/11/2016 (project facility approved 2011)	189 days	Azeri and English
Regional	Centerra Global	Private	19/05/2016	26/07/2016 for ESIA in Mongolia (Project facility approved 27/01/2016)	69 days for Mongolian facility	Mongolian and English
Armenia	Lydian (Amulsar Gold Mine) – Extension	Private	19/05/2016	20/07/2016	63 days	Armenian and English
Jordan	Al Rajef Wind Farm	Private	17/05/2016	07/09/2016	114 days	Arabic and English
Egypt	Egypt Renewable Feed-In-Tariff Framework	Private	13/05/2016	Not yet scheduled	--	Arabic and English
Kazakhstan	KIPF Equity Investment	Private	13/05/2016	20/07/2016	69 days	Russian and English
Turkey	Centerra Turkey	Private	08/04/2016	20/07/2016	104 days	Turkish and English
Moldova	Ungheni Chisinau Gas Pipeline	Public	22/03/2016	30/11/2016	253 days	English and Romanian
Greece	Energean	Private	04/03/2016	04/05/2016	62 days	Greek and English
Tunisia	STEG Transmission	Public	19/02/2016	21/09/2016	216 days	Arabic and French, some in English

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
Poland	Banie Wind Farm - extension	Private	Phase 2: 29 /01/2016	Phase 2 Board 20/04/2016	83 days	Polish and English
Slovak Republic	D4 Highway/R7 Expressway	Private	06/11/2015	25/05/2016	202 days	Slovak and English
Turkey	Gama Enerji Equity	Private	15/08/2015	Not yet scheduled	--	Turkish and English
Serbia	Alibunar A Windfarm Project	Private	13/05/2015	N/A Cancelled	--	Serbian and English
Serbia	Dolovo Cibuk I Wind Farm	Private	06/02/2015	Not yet scheduled	--	Serbian and English

3.5 Aggregate information on transition impact

The aggregate geographical and sectoral breakdowns on transition impact were included in the Bank's Annual Report 2015 published in May 2016.

4. ACCOUNTABILITY AND GOVERNANCE RELATED INFORMATION

4.1 Compliance documentation

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 2016 the Bank cross debarred 183 entities and 94 individuals based on debarment notices received.

In 2016, following separate proceedings instituted under the Bank's Enforcement Policy and Procedures, the Bank debarred six individuals and seven corporate entities. The list of all EBRD debarred entities and individuals can be found at <http://www.ebrd.com/ineligible-entities.html>

The Enforcement Policy and Procedures in force from 5 November 2015 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 2016 will be released and posted on the Bank's website May 2017.

Project Complaint Mechanism (PCM)

Details of all PCM activities are found in the Annual Report for 2016 also to be published in Q1 2017: <http://www.ebrd.com/work-with-us/project-finance/project-complaint-mechanism/about.html>

Seven independent experts assisted the PCM Officer in review of Complaints. 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 2016, the PCM received twenty six new Complaints, out of which one has been registered. Most of the Complaints have been found ineligible for registration as they related to procurement, labour and contractual issues, and allegations of fraud and corruption which fall outside of the PCM's remit.

In 2016, the first PCM Complaint relating to information disclosure was made and found eligible for Compliance Review. The full information on the registered Complaint is available on the PCM Register: <http://www.ebrd.com/work-with-us/project-finance/project-complaint-mechanism/pcm-register.html>

In total, twelve Compliance Review, Problem-Solving and Monitoring reports were published in 2016. These are available on the PCM Register: <http://www.ebrd.com/work-with-us/project-finance/project-complaint-mechanism/pcm-register.html>.

4.2 Evaluation documentation

The following evaluation documents were published on ebrd.com:

Table 5: Evaluation Documentation

Document type	Publication in 2016
The Bank's Evaluation Policy;	Published on ebrd.com
EvD's Annual Evaluation Review (AER);	Annual Evaluation Review 2015
EvD's Annual Work Programme and Budget;	Work Programme 2016-18 & Budget 2016
Summaries of Operational Evaluations	Operation evaluation summary: Crisis response to banks Operation evaluation summary: four wind farms
Special and thematic studies and approach papers.	Resident Offices Supply Chains & Backward Linkages Country Strategies - an initial review EBRD projects in the Russia rail sector Transactions with state-owned enterprises Sustainable Energy Financing Facilities (SEFFs)

4.3 Other documentation and Reports

One meeting of the Bank's Environmental and Social Advisory Council was held on 27 July 2016. A summary of the meeting can be found here: <http://www.ebrd.com/who-we-are/our-values/environmental-and-social-advisory-council.html>.

Other annual reports published in 2016 included 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.

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

This section 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 2016, the EBRD enhanced its engagement with civil society organisations (CSOs) in its countries of operations. The Bank's Civil Society Capacity Enhancement Framework helped establish a stronger partnership between the Bank and civil society. During 2016, this Framework launched 15 technical assistance projects worth around €3million that benefited more than 8,000 civil society and community representatives, through tailored capacity-enhancement activities.

In total, the Bank organised around fifty thematic meetings and events with civil society attended by nearly 400 civil society representatives to engage CSOs early on in the process to develop the Bank's key policies, strategies, and complex investment projects.

CSOs were regularly informed about the latest EBRD developments through dedicated webpages for civil society, a quarterly EBRD-CSO Newsletter, targeted email notifications and alerts, and use of social media platforms, such as Facebook and Twitter.

CSOs that had registered with the EBRD (around 3,400 CSOs) 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.

In 2016, the EBRD consulted with local CSOs on the Bank's first strategy for Greece and on reviews of the country strategies for Belarus, Egypt, Georgia, Kosovo, Mongolia, Montenegro and Kazakhstan.

In relation to the Bank's investments, international and local CSOs engaged in dialogue with the EBRD on 45 investment projects in 20 countries where the Bank operates.

The 2016 Civil Society Programme - the flagship event of EBRD's engagement with CSOs run in parallel to the Bank's Annual Meeting - included 100 civil society participants from 22 countries. During the two-day Programme, the EBRD senior management, the President and the Board of Directors exchanged views with civil society representatives. The 2016 Civil Society Programme also strengthened the shift in the EBRD's engagement with civil society from dialogue to closer cooperation and partnership in discussions on the preliminary results of the Bank's Civil Society Capacity Enhancement Framework.

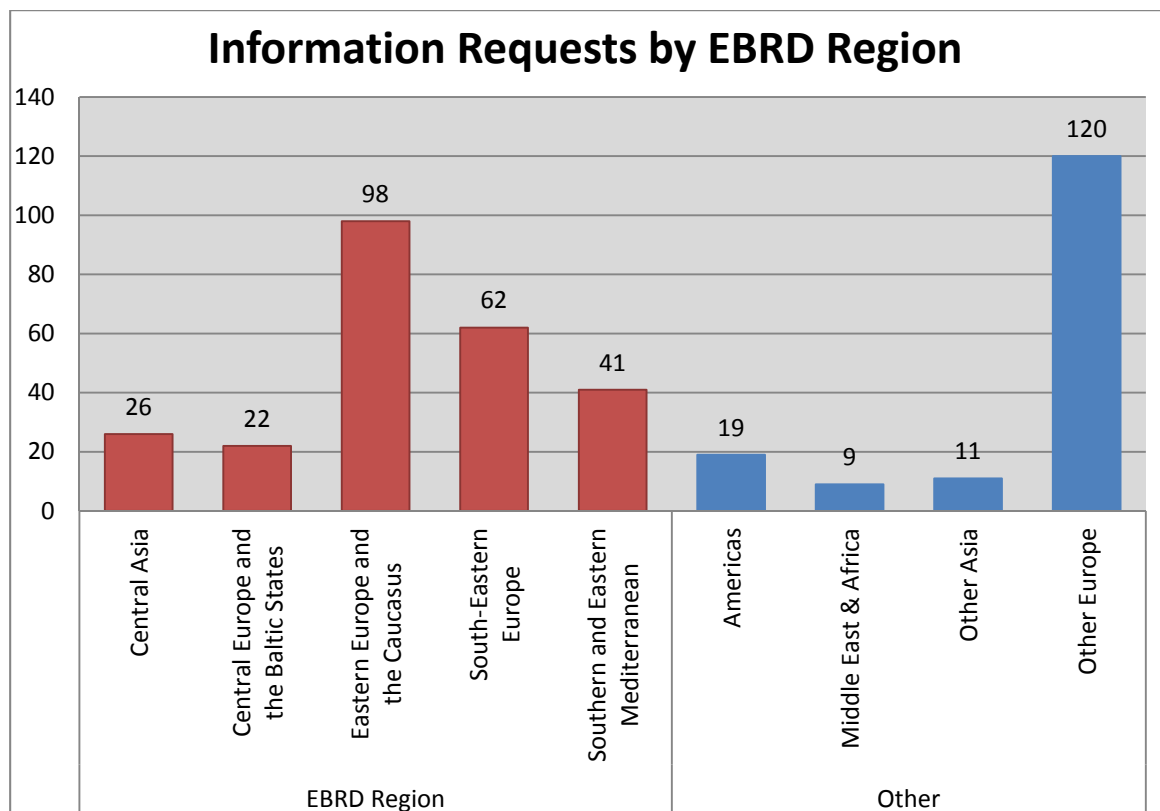
Responding to Information Requests

In 2015, the Communications Department coordinated responses to 208 different items of correspondence. In 2016, a new system was set up and a different procedure established. Instead of the Communications Department distributing the incoming PIP requests, separate e-mail addresses were set up which are accessible via the homepage on ebrd.com under [“Enquiries”](#).

Of the total 573 requests, 456 were related to the PIP, and concerned accountability and governance (5); general institutional information (194); policy and strategy (15); projects and project finance (169); publications (1); procurement and purchasing (6); and other (66).

Not all those who submitted a PIP-related request identified their professional activity. Where identified, PIP-related requests came from the following senders: 74 from civil society; 288 from business or private enterprise; 7 from other international public organisations and 35 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.

Enhancing the Bank’s website

In 2016, the ebrd.com website was enhanced with new functionality such as image galleries and a speeches template.

Heightened interest in the Chernobyl power plant, including the sliding into place of the New Safe Confinement, led to record traffic on the EBRD website, with 16,711 sessions on 23 April and 16,757 sessions on 29 November 2016.

2016 was also the year that the EBRD launched its first podcast, called ‘Pocket Economics’ which is a series about ideas in development affecting the EBRD regions and beyond. The podcast was available on Soundcloud, iTunes and the EBRD website.

For 2016 as a whole, external (i.e. excluding EBRD HQ) users of the website numbered 1,111,309 (up from 953,415 in 2015) and sessions numbered 2,149,552 (up from 1,853,975).

Below is a graphic representation of the geographic origin of external page views on ebrd.com (Top 20)

