

# PUBLIC INFORMATION POLICY REPORT ON IMPLEMENTATION 2012

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# **PUBLIC INFORMATION POLICY REPORT ON IMPLEMENTATION 2012**

## **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 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 2012.

In 2012, 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 nine Country Strategy reviews and two sectoral strategies.

### *Project related information*

- 158 private sector Project Summary Documents (PSDs) were posted on the web. With one exception, all PSDs were PIP compliant (see p. 15).

### *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 most translated PSDs were posted in a timely fashion, there were some minor delays.

### *Environmental and social information*

- Environmental and Social Impact Assessments (ESIAs) on all "Category A" projects that proceeded to Board approval in 2012 were made available in a local language and for the required number of days.

### *Accountability and governance information*

- This was posted as required.

*Requests for information*

- The Bank responded in a timely fashion to requests for information. There was one appeal against a decision to refuse a request for information that the Bank was unable to release.

## **IMPLEMENTATION RECORD: 1 JANUARY 2012 – 31 DECEMBER 2012**

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 and Sector Strategies and projects was updated on the Bank’s website throughout 2012 on a monthly basis. 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 2012.

#### **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 23 Board Meetings held in 2012 were posted on the website following approval of these Minutes by the Board. These Minutes were for the Meetings held on the following dates: 17 and 31 January; 14 and 28 February;

13 and 27 March; 17 and 25 April; 9 and 29 May; 13 and 26 June; 10 and 23/24 July; 4 and 18 September; 2, 17 and 31 October; 13 and 26 November; 12 and 18 December.

#### **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 23/24 July 2012 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 2011 Bank Annual Financial Report, which was posted on the website in May 2012.

The 2012 Annual Financial Report was posted on the website in May 2013.

## **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 nine of the Bank’s countries of operations came up for approval in the period 1 January to 31 December 2012, 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 2012 the EBRD also made a special effort in reaching out to wider audiences and disseminating the information about the consultation process on the EBRD’s Country Strategies by using social media platforms like Facebook and Twitter. In addition, information about the review process was posted on the EBRD’s “Have your say” webpage, which is dedicated to provide visibility to the review of policies and strategies. As part of the Bank’s pro-active engagement with civil society stakeholders, the Civil Society Engagement Unit undertook dedicated consultation workshops with CSOs at the Resident Offices during the consultation period on the selected Country Strategies. As a result of these activities, the number of the comments received from CSOs and members of public significantly increased in 2012. (See Page 26 *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>
Albania	27 September 2012	11 November 2012	Yes
Armenia	2 April 2012	17 May 2012	Yes
Estonia	17 August 2012	1 October 2012	Yes
Lithuania	13 September 2012	24 October 2012	No
Romania	19 December 2011	3 February 2012	Yes
Russia	17 October 2012	3 December 2012	Yes
Slovak Republic	10 September 2012	24 October 2012	No
Tajikistan	16 December 2011	30 January 2012	No
Turkey	8 February 2012	23 March 2012	No

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### **Strategy for Albania**

The draft Strategy was posted on the Bank’s website on 27 September 2012 with public comments requested by 11 November 2012. In the course of the Strategy preparation, the Bank organised a number of meetings with Albanian CSOs to seek their views on the operational environment in Albania and to solicit proactively comments on the draft Strategy. CSOs welcomed the Bank’s focus on the improvement of distribution efficiency, loss reduction and payment collection through its existing investment programmes. In addition, CSOs acknowledged the importance of upgrading municipal infrastructure and investments in the railways sector in Albania and urged the Bank also to promote sound investments in renewables energy, agribusiness and the tourism sectors. Among the main transition challenges in Albania, CSOs identified the high unemployment rates, the sustainability of the energy sector and the low participation of women in the labour force.

The Strategy was approved by the Board of Directors on 12 December 2012. 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 <http://www.ebrd.com/pages/country/albania/strategy.shtml>

### **Strategy for Armenia**

The draft Strategy was posted on the Bank's website on 2 April 2012 with public comments requested by 17 May 2012. In the course of the Strategy preparation, the Bank organised a number of meetings with Armenian CSOs to hear their assessment of the political and economic situation in the country and to solicit their views on Armenia's transition challenges and the EBRD's operation response and strategic priorities in Armenia. CSOs provided feedback on a wide range of topics, including the development of civil society in Armenia, public participation in the government's decision-making processes, corruption and corporate governance and gender equality.

The Strategy was approved by the Board of Directors on 29 May 2012. 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 <http://www.ebrd.com/pages/country/armenia/strategy.shtml>

### **Strategy for Estonia**

The draft Strategy was posted on the Bank's website on 17 August 2012 with public comments requested by 1 October 2012. Written comments were received from a local civil society organisation - Estonian Green Movement – FoE. Comments were made in relation to the key sectoral challenges from the perspective of civil society that the EBRD should take into consideration while investing in the country, such as unfair competition in the energy market and lack of transparency and predictability of the regulatory framework of the renewable energy market in Estonia.

The Strategy was approved by the Board of Directors on 17 October 2012. 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 <http://www.ebrd.com/pages/country/estonia/strategy.shtml>

### **Strategy for Lithuania**

The draft Strategy was posted on the Bank's website on 13 September 2012 with public comments requested by 24 October 2012. No comments on the draft Strategy were received during the public consultation period.

The Strategy was approved by the Board of Directors on 13 November 2012 and can be found on <http://www.ebrd.com/pages/country/lithuania/strategy.shtml>

## **Strategy for Romania**

The draft Strategy was posted on the Bank's website on 19 December 2011 with public comments requested by 3 February 2012. In the course of the Strategy preparation, the Bank organised a number of meetings with Romanian CSOs to seek their views on the operational environment in Romania and to solicit proactively comments on the draft Strategy. CSOs expressed their support for the Bank's continued investments to improve energy efficiency, particularly in the power and energy sector and through credit lines for small and medium enterprises (SMEs). CSOs also welcomed the EBRD's planned support of the production oriented economy in Romania. In this regard, recommendations were provided for the EBRD to support 'green' and innovative companies which will provide Romania with a competitive advantage among other companies in the EU and worldwide. CSOs also expressed their support for enhanced commercialisation, competition and private sector involvement as vital prerequisites for increasing the overall efficiency of current and future infrastructure projects. In addition, comments were made in relation to the Bank's planned investment in the transport sector and assistance to SMEs via financial institutions.

The Strategy was approved by the Board of Directors on 28 February 2012. 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 <http://www.ebrd.com/pages/country/romania/strategy.shtml>

## **Strategy for the Russian Federation**

The draft Strategy was posted on the Bank's website on 17 October 2012 with public comments requested by 3 December 2012. In the course of the Strategy preparation, the Bank organised a number of meetings with Russian CSOs to seek their views on the operational environment in the Russian Federation and to solicit proactively comments on the draft Strategy. Civil society representatives commended the EBRD's efforts in promoting diversification through support to the non-resource economy in Russia and increasing economic opportunities in Russian regions. They also welcomed the EBRD's increased focus on energy efficiency and sustainable renewable energy and the Bank's plans to deepen support for the innovation driven economy. Among the recommendations for the EBRD were to concentrate its efforts on improving energy efficiency in the housing and industry sectors and energy recovery, and to consider investing in urban waste management and carbon trading. A number of CSOs emphasised the need to clearly outline the EBRD's criteria for selection of investment projects in Russia. It was also recommended that the country strategy should indicate how the political assessment for Russia will condition the level of involvement the EBRD has in the country.

The Strategy was approved by the Board of Directors on 18 December 2012. 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 <http://www.ebrd.com/pages/country/russia/strategy.shtml>

### **Strategy for the Slovak Republic**

The draft Strategy was posted on the Bank's website on 10 September 2012 with public comments requested by 24 October 2012. No comments on the draft Strategy were received during the public consultation period.

The Strategy was approved by the Board of Directors on 13 November 2012 and can be found on <http://www.ebrd.com/pages/country/slovakrepublic/strategy.shtml>

### **Strategy for Tajikistan**

The draft Strategy was posted on the Bank's website on 16 December 2011 with public comments requested by 30 January 2012. No comments on the draft Strategy were received during the public consultation period.

The Strategy was approved by the Board of Directors on 13 March 2012 and can be found on <http://www.ebrd.com/pages/country/tajikistan/strategy.shtml>

### **Strategy for Turkey**

The draft Strategy was posted on the Bank's website on 8 February 2012 with public comments requested by 23 March 2012. No comments on the draft Strategy were received during the public consultation period.

The Strategy was approved by the Board of Directors on 17 April 2012 and can be found on <http://www.ebrd.com/pages/country/turkey/strategy.shtml>

### ***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.*

### **Implementation:**

This requirement came into force on 1 November 2011, since when all draft Country Strategies have been translated into the relevant official national language.

## ***Final Country Strategies and Translation of Approved 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.”*

*“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 the period under review, the nine Country Strategies approved by the Board in 2012 were posted on the website as required by the PIP (see Table 2). In line with the Policy, a timetable for Strategy reviews in 2012 was also posted on the website at the beginning of the year and updated as appropriate.

The nine approved Country Strategies were translated into relevant official national languages.

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 2012**

<b>Country</b>	<b>Date approved</b>	<b>Posted on website</b>
Albania	12 December 2012	4 February 2013
Armenia	29 May 2012	21 June 2012
Estonia	17 October 2012	19 October 2012
Lithuania	13 November 2012	21 November 2012
Romania	28 February 2012	21 March 2012
Russian Federation	18 December 2012	21 December 2012
Slovak Republic	13 November 2012	30 November 2012
Tajikistan	13 March 2012	17 April 2012
Turkey	17 April 2012	03 May 2012

## 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:**

The draft Municipal and Environmental Infrastructure Sector Strategy was posted on the website for 45 days from 23 March 2012. Comments were submitted only by (i) CEE Bankwatch Network, an international non-governmental organisation based in Prague, Czech Republic, and established in 1995 to monitor the activities of those IFIs that operate in Central and Eastern Europe; (ii) REC Caucasus Branch Office in Azerbaijan.

These comments were addressed in the Report on the Invitation to Comment which became an addendum to Strategy which was approved by the Board of Directors on 26 June 2012 and can be found on [www.ebrd.com/pages/sector/mei/policy.shtml](http://www.ebrd.com/pages/sector/mei/policy.shtml).

The Mining Operations Strategy was also discussed in 2012. Public consultation on the Strategy actually began in 2009, and over the course of the public consultation the Bank invited more than 1,500 organisations to comment on the Policy from a wide range of stakeholders, including mining companies, CSOs, governments and academia and put an active effort into reaching grass-roots organisations. The draft Strategy was posted on the website for 60 days (instead of 45 days) from 25 April 2012 which, at the request of CSOs, was then extended for a further 21 days. Overall, 118 comments on the draft Policy were registered, contributions being received from international CSOs and leading mining companies as well as from local organisations, regulators, industry associations, cement producers (with regard to quarrying) and consultants.

These comments were addressed in the Report on the Invitation to Comment which became an addendum to Strategy which was approved by the Board of Directors on 17 October 2012 and can be found on <http://www.ebrd.com/downloads/policies/sector/mining-operations-comments.pdf>

### ***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:**

The Municipal and Environmental Infrastructure Sector Strategy was approved by the Board on 26 June 2012. The approved strategy was posted on the Bank’s website along with a summary of the comments received during the public consultation period.

The Mining Operations Strategy was approved by the Board on 17 October 2012. The approved strategy was posted on the Bank’s website along with a summary of the comments received during the public consultation period.

## **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***

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 2012, the 2008 Environmental and Social Policy was translated into French, bringing the number of languages to 14. The English version is the approved policy. 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:

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

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 2012 were posted on the Bank's website in April 2012. The Medium Term Strategy Update and the Strategic Portfolio Review are no longer prepared.

The on-line archiving of strategies and policies is 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, 204 projects (158 private sector and 46 public sector) were prepared for Board consideration. With one exception, all PSDs were PIP compliant during the period under review. The non-compliant PSD - Regional: GTS Central Europe - was published only 26 days before Board to accommodate a late acceleration in the project timetable. The deferral with respect to the PIP was not requested in the President’s Recommendation, as OpsCom approved a new method of dealing with such cases, i.e. no objection approval from OpsCom and OSG, recorded in the Summary Fact Sheet (PSD release date: 1st March 2012; Deferral approved 7th March 2012).

**Table 3: PSDs published 1 January - 31 December 2012**

<b>PSDs for Private sector projects</b>	<b>Number</b>
Compliant with policy	<b>157</b>
Non-compliant with PIP	1
<b>Total number of private sector PSDs</b>	<b>158</b>
Deferrals in accordance with PIP *	27
Capital markets transaction (13)	14
Legitimate sponsor concerns on confidentiality (20)	11
Likelihood of substantial changes at Final Review (7)	5
<b>PSDs for Public sector projects</b>	
Compliant with policy	46
Non-compliant with PIP	0
<b>Total number of public sector PSDs</b>	<b>46</b>
Deferrals in accordance with PIP	0
Capital markets transaction	0
Legitimate sponsor concerns on confidentiality	0
Likelihood of substantial changes at Final Review	0

\* 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 158 private sector PSDs, there were 27 deferrals to the 30-day release timeframe, all of which were authorised within the terms of the Policy. There were no deferrals for public sector project PSDs.

In the reporting period from 1 January - 31 December 2012, 143 PSDs were translated into the relevant official national languages<sup>1</sup>. The following is the country breakdown:

Armenia (5); Belarus (5); Bosnia & Herzegovina (3); Bulgaria (7); Croatia (5); Egypt (1); FYR Macedonia (4); Georgia (3); Jordan (3); Kazakhstan (11); Kyrgyz Republic (4); Lithuania (1); Moldova (4); Mongolia (6); Montenegro (3); Morocco (2); Poland (4); Romania (11); Russian Federation (23); Serbia (8); Slovak Republic (1); Tajikistan (4); Tunisia (1); Turkey (7); Ukraine (17). There were 20 PSDs for regional projects that did not require translations. Translations of 42 PSDs remained outstanding at the end of the period under review.

<sup>1</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.

### **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:**

No 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**

Two 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:**

A total of 22 “Category A” projects requiring an environmental and social impact assessment were in an active disclosure period in 2012.

One project, the MCFF-Bank Republic-Rusmetali, is not subject to Board Review and is approved at a different level, the Small Business Investment Committee (SBIC). The documents for the Rusmetali project have been in the public domain since 30 March 2012 and the project has not yet gone to SBIC for final approval.

Fourteen of the 22 projects proceeded to Board Review and 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 or 120 days minimum disclosure for public sector projects prior to the Board Review of the Project. All projects’ full ESIA’s are available in local language.

Twenty projects (of 22 disclosed) had ESIA’s electronically available on the client’s website during the active consultation period. The links were provided on the individual project’s ESIA web page (<http://www.ebrd.com/saf/search.html?type=eia>). The IPP4 Al-Manakher Power Project in Jordan and the Aktau Waste Management Project in Kazakhstan did not have their ESIA’s electronically available, as the clients did not have local websites for project level information.

In 2012, no requests were made to review ESIA’s in EBRD’s offices in London.

Table 4: Summary of Category A Disclosure in 2012

Country	Project Name	Sector	Date EIA HQ/RO	Board Date	Days available (before Board)	Language of ESIA
1. Kyrgyz Republic	<a href="#">Bishkek Solid Waste</a>	Public	06/12/12	--	--	Russian and English
2. Romania	<a href="#">Crucea I</a>	Private	16/10/12	--	--	Romanian and English
3. Turkey	<a href="#">Keskinoglu</a>	Private	13/09/12	13/11/12	62	Turkish and English
4. Mongolia	<a href="#">Senj Sant debt</a>	Private	11/09/12	18/12/12	99	Mongolian and English
5. Mongolia	<a href="#">Oyu Tolgoi LLC</a>	Private	10/09/12	--	--	Mongolian and English

6. Jordan	<a href="#">IPP4 Al-Manakher Power Project</a>	Private	16/08/12	17/10/12	63	Arabic and English
7. Kazakhstan	<a href="#">Aktau Waste Management Project</a>	Public	26/07/12	26/11/12	124	Russian and English
8. Romania	<a href="#">EDPR Romania Wind Farms (Sarichioi and Vutcani WPPs)</a>	Private	23/07/12	02/10/12	72	Romanian and English
9. Egypt	<a href="#">Egyptian Refinery Company (ERC)</a>	Private	17/10/12	--	--	Arabic and English
10. Georgia	<a href="#">MCFE- Bank Republic - Rusmetali</a>	Private	30/03/12	N/A	N/A	Georgian and English
11. FYR Macedonia	<a href="#">FYR Macedonia: Railway Corridor VIII - Phase I</a>	Public	09/03/12	24/07/12	138	Macedonian and English
12. Romania	<a href="#">Vimetco Power</a>	Private	29/12/11	--	--	Romanian and English
13. Montenegro	<a href="#">Montenegro: Lastva - Pljevlja Transmission Line</a>	Public	23/12/11	--	--	Montenegrin and English
14. Armenia	<a href="#">Kotayk Solid Waste Management Project</a>	Public	08/12/11	25/04/12	140	Armenian and English
15. Romania	<a href="#">EPGE (Chirmogeni wind) - 80 MW</a>	Private	27/10/11	29/05/12	216	Romanian and English
16. Ukraine	<a href="#">Lafarge Mykolaiv Dry Line</a>	Private	12/10/11	27/03/12	168	Ukrainian and English
17. Russia	<a href="#">Sibcement</a>	Private	11/10/11	--	--	Russian and English
18. Turkey	<a href="#">Kirikkale CCGT</a>	Private	04/10/11	02/10/12	365	Turkish and English
19. Bosnia and Herzegovina	<a href="#">Plava Voda Regional Water Supply Project</a>	Public	25/07/11	13/11/12	478	Bosnian and English
20. Poland	<a href="#">EC SW - CCGT</a>	Public	05/07/11	29/05/12	330	Polish and English
21. Bosnia and Herzegovina	<a href="#">Banja Luka to Dobojski Road</a>	Public	17/06/11	17/04/12	306	Bosnian and English
22. Turkey	<a href="#">Turkey Eurasia Tunnel</a>	Private	07/03/11	13/06/12	464	Turkish and English

#### **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 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 ADB), the Inter-American Development Bank Group (IaDB) and the World Bank Group (WBG) (available at <http://www.ebrd.com/downloads/integrity/Debar.pdf>), in 2012 the Bank cross debarred 45 entities and 32 individuals based on 21 debarment notices received from the WBG, 15 notices received from the IaDB and four notices received from the ADB.

There were no Bank initiated debarments under its Enforcement Policy and Procedures in 2012.

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 Report for the year 2011 was released and posted on the Bank's Website on 1 June 2012 and can be found at: <http://www.ebrd.com/downloads/integrity/ACReport11.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 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 is available 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 are also posted on the PCM webpage in English and in Russian 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 third PCM Annual Report, covering the year 2012 was posted on the Bank’s website in April 2013 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 three complaints received in February/March 2011 regarding the Tbilisi Railway Bypass project focusing on the adequacy of the assessments of the project’s social and environmental impacts. The review, carried out by an independent expert, concluded that no non-compliance had occurred. The Compliance Review Report, published in July 2012, is available at: [http://www.ebrd.com/downloads/integrity/Tbilisi\\_cr\\_report\\_final.pdf](http://www.ebrd.com/downloads/integrity/Tbilisi_cr_report_final.pdf)

Eligibility Assessment Reports in relation to the Boskov Most Hydro Power Plant project in FYR Macedonia (complaint registered on 14 November 2011) and the Ombla Hydro Power Plant project in Croatia (complaint registered on 24 November 2011) were posted on the PCM website in May and July 2012, respectively. In both cases the eligibility assessment determined that the complaint was eligible for a compliance review; copies of the eligibility

assessment reports are available at [http://www.ebrd.com/downloads/integrity/Boskov\\_Most\\_final.pdf](http://www.ebrd.com/downloads/integrity/Boskov_Most_final.pdf) and [http://www.ebrd.com/downloads/integrity/Ombla\\_ear\\_6.07.2012.pdf](http://www.ebrd.com/downloads/integrity/Ombla_ear_6.07.2012.pdf) respectively.

In addition, the PCM registered four new complaints in 2012. With respect to three of these complaints concerning the Paravani Hydro Power Plant project in Georgia, the Rivne Kyiv High Voltage Line project in the Ukraine and the Sostanj Thermal Power Plant project in Slovenia, eligibility assessments have now been completed and each of the complaints has been found eligible for a compliance review. A copy of the complaint and the respective eligibility assessment report is available at <http://www.ebrd.com/pages/project/pcm/register.shtml>  
[http://www.ebrd.com/downloads/integrity/paravani\\_complaint\\_22.12.2011.pdf](http://www.ebrd.com/downloads/integrity/paravani_complaint_22.12.2011.pdf)  
[http://www.ebrd.com/downloads/integrity/ear\\_paravani.pdf](http://www.ebrd.com/downloads/integrity/ear_paravani.pdf)  
[http://www.ebrd.com/downloads/integrity/rivne\\_kyiv\\_complaint\\_10.01.2012.pdf](http://www.ebrd.com/downloads/integrity/rivne_kyiv_complaint_10.01.2012.pdf)  
[http://www.ebrd.com/downloads/integrity/ear\\_rivne\\_kyiv.pdf](http://www.ebrd.com/downloads/integrity/ear_rivne_kyiv.pdf)  
[http://www.ebrd.com/downloads/integrity/Sostanj\\_complaint\\_17.01.2012.pdf](http://www.ebrd.com/downloads/integrity/Sostanj_complaint_17.01.2012.pdf)  
[http://www.ebrd.com/downloads/integrity/ear\\_sostanj\\_final.pdf](http://www.ebrd.com/downloads/integrity/ear_sostanj_final.pdf).

A copy of the fourth complaint registered in relation to the EPS Kolubara Environmental project in Serbia is available at [http://www.ebrd.com/downloads/integrity/EPS\\_Kolubara\\_complaint\\_17.08.2012.pdf](http://www.ebrd.com/downloads/integrity/EPS_Kolubara_complaint_17.08.2012.pdf). The complaint is currently undergoing its eligibility assessment.

Information regarding the current roster of PCM Experts 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 2012:

#### **OPER Summaries**

Véolia Voda Equity Investment (Regional)  
Power Project : BOT Belchetow (Poland)  
Kositukki (Russia)  
Chisinau Shopping Mall (Moldova)  
Natron Hayat (Bosnia)  
Idea/Konzum BiH (Balkans)  
MOL Gas Storage (Hungary)  
General Motors (Russia)  
MSME Financing Framework  
Ukreximbank (Ukraine)

#### **Technical Cooperation OPERS**

Corridor Vc (Croatia)  
Sakha (Yakutia) Republican MSDP (Russia)  
Vologda Municipal Water Services (Russia)

#### **Special Studies**

Special Study Transport Operation Policy  
MEI Sector Operation Policy Special Study  
FAO Framework Agreements  
Extractive Industries  
Power & Energy Sector  
Financial Institutions - Insights and Lessons  
Legal Transition  
Facility for Medium-Sized Projects

#### **Key Evaluation Documents**

EvD Work Programme Final Report for 2012  
Annual Evaluation Review (formerly known as the AEOR)  
Evaluation Policy

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 *2011 Sustainability Report* at the Bank’s Annual Meeting in May 2012. The 2011 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. For the first time, the report was published on-line as a digital presentation, supported by a summary printed report. The digital version of the report is posted in English on the Bank’s website at: <http://www.ebrd.com/pages/digital-publications/flagships/sr11/index.html> . The printed version is also available in English and Russian at: <http://www.ebrd.com/downloads/research/sustain/sr11e.pdf> and <http://www.ebrd.com/russian/downloads/research/sustain/sr11r.pdf>

In 2012, one meeting of the Environmental and Social Advisory Council was held. The summary of the 9 February 2012 meeting was posted on the Bank’s website. <http://www.ebrd.com/downloads/about/sustainability/120209.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**

The Annual Procurement Review 2011 was published on the Bank’s website in June 2012.

## 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:**

The Annual Report on Engagement of Consultants by EBRD 2011 was published on the Bank’s website in May 2012.

## *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 Annual Corporate Procurement Review 2011 was published on the Bank’s website in June 2012.

## *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 2011 was presented to the Financial and Operations Policies Committee (FOPC) on 10 May 2012 and posted on the Bank’s website in June 2012.

## *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 2012.

**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 139 PIP-related requests for information received by the Communications Department, two requests for confidential information were not answered positively, one of which resulted in an Appeal to the Secretary General.

**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 10 May 2012. The report was posted on the Bank’s website in June 2012.

***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 2012, the EBRD continued to encourage civil society groups to take part in an open and inclusive dialogue on its investment operations, policies and strategies in order to ensure that the Bank remains accountable to stakeholders. The EBRD also made a special effort to explore innovative ways to enhance the dialogue with civil society by the use of social media and remote participation in events.

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), targeted email notifications and alerts and use of social media platforms, such as EBRD Blog, Facebook and Twitter.

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 2012, the EBRD invited public comments on nine draft Country Strategies in accordance with the PIP. To further strengthen the Bank's country strategy consultation practice and reach out to a broad range of civil society stakeholders, the start of a new review period was widely advertised via email notifications and social media platforms. Information about the consultation process on the draft Country Strategies was also posted on the EBRD's "Have your say" webpage, which is dedicated to provide visibility to the review of the Bank's policies and strategies. In addition, the Civil Society Engagement Unit conducted dedicated workshops with CSOs at the Resident Offices during the consultation period on country strategies for Albania, Romania and the Russian Federation. As a result of the outreach activities and consultation 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 Board of Directors alongside the final country strategies.

The EBRD also provided an annual update to CSOs on the Bank's calibrated approach to country strategies for Belarus and Turkmenistan.

Civil society engagement has formed an important element in the Bank's expansion into its new countries of operations in the southern and eastern Mediterranean (SEMED) region. From January to September 2012 the Bank organised a series of face-to-face meetings between senior management and over 150 civil society organisations on the ground in Jordan, Tunisia, Morocco and Egypt as well as at the EBRD Headquarters in London. The workshops aimed at ensuring that civil society's views on the planning, implementation and expected impact of the Bank's future engagement in the country could be voiced. The views and recommendations coming out of the workshops were reflected in the Country Assessments (CAs) for the SEMED countries, strategic documents that will guide the EBRD's operations until these countries become fully fledged countries of operations. The EBRD's newly appointed President met in London with several representatives of prominent international CSOs based in London, Brussels, Prague and Beirut to discuss the application of the political mandate of the EBRD; the Bank's expansion to the SEMED region and the impact of the Bank's operations in this region. The President also met with Serbian CSOs in Belgrade during his visit to the country.

In May, around 60 civil society representatives attended the Civil Society Programme held in parallel with the Annual Meeting of the Board of Governors and the Business Forum in London. The CSO participants came from 13 countries of operations, seven other shareholder countries and three countries in the SEMED region. The two-day programme provided a high level platform for dialogue between civil society representatives and the President, the Board of Directors, senior management and Bank's staff.

Among the topics discussed at the Civil Society Programme were the EBRD's role in the SEMED region and potential operational priorities; political aspects of the EBRD mandate; energy security in the Bank's countries of operations; the

Bank's role in the mining sector and its first Mining Operations Policy; issues of gender and inclusion in the context of the Bank's transition methodology; EBRD investments in natural resources, heavy industries, sustainable energy and other sectors, and EBRD's policies such as the Evaluation Policy and Project Complaint Mechanism.

In 2012, the Civil Society Programme also included a special discussion panel entitled "*Good corporate citizenship: managing public and IFI expectations*", which debated, among other related questions, the role of civil society and international financial institutions in helping companies to develop corporate transparency and enhance their social accountability.

As part of the Evaluation Policy Review, the EBRD organised a first webinar event with the EBRD Chief Evaluator, Joe Eichenberger, to discuss with civil society stakeholders lessons learned and challenges ahead in the evaluation process of the Bank's financed projects.

In 2012, the EBRD's Board of Directors undertook Board Consultation Visits (BCVs) to Albania, Montenegro, Poland, Kyrgyz Republic, Russia and Ukraine. 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 countries of operations.

## **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 2012, the Communications Department coordinated responses to 344 different items of correspondence.

Out of the 344 requests, 139 were related to the Public Information Policy, and concerned Accountability & Governance (2); General Institutional Information (2); Policy and Strategy (5); Projects (112); Publications (2); and Other (16).

All PIP-related requests came from the following senders: 16 from private sector, 4 from students/academics, 105 from civil society, 9 from unidentified senders, 1 from government, 2 from members of public, and 2 from journalists.

In geographic terms the sources of requests were the following countries: Ukraine (23); Germany (14); Serbia (13); US (10); Croatia (9); Georgia, Romania and Russia (5 each); Jordan, Kazakhstan, Slovenia and the UK (4 each); Azerbaijan, Czech Republic, France, FYR Macedonia and Poland (3 each); Albania, Bosnia & Herzegovina, Egypt, Kosovo and Turkey (2 each); and Armenia, Bulgaria, Finland, Italy, Korea, Lebanon, Luxembourg, Mongolia and Spain (1 each). Five requests were unidentified.

With regard to the project-related correspondence, the major sectors of interest were Power and Energy (46 requests), Agribusiness (25) and Natural Resources (14 requests).

Twenty nine PIP-related requests were not responded to inside the stipulated timeframe of 20 working days, mainly due to the responsible staff travelling for extensive periods of time or the quantity of information required.

The remaining correspondence received and responded to was of a general non-PIP related nature and covered such areas as Project Finance requests; Job, Consultancy and Intern possibilities; Publications; Scholarships; Procurement and Purchasing, as well as general Institutional Information.

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 that 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:**

The Communications and IT departments continued to develop, refine and expand ebrd.com during 2012 to improve the site's effectiveness and make information more readily accessible.

One of the most significant individual changes was a redesign of ebrd.com's homepage, which aimed to simplify the page and guide visitors to key

information more easily and quickly. Audience research carried out since that redesign has shown that it was overwhelmingly successful in meeting that goal.

A footer was also added to every web page, packed with useful links to key information on transparency information and more, so that site users are never more than a couple of clicks away from information on this topic.

Numerous incremental but impactful changes have also been made to many page layouts to facilitate ease-of-use around the site. Currently, however, the content management system upon which the site is built is being pushed to the limit, so the provision of a new system during 2013 will be key to the continued delivery of improvements and the introduction of many new and effective features.

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

One request for information resulted in the requester invoking the right of appeal to the Secretary General.