



**European Bank**  
for Reconstruction and Development

# Report on Implementation of the EBRD's Access to Information Policy

## 2020

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2020

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## Introduction

1. The principles of accountability, good governance and responsibility to stakeholders are fundamental to the operations of the European Bank for Reconstruction and Development (EBRD), and are demonstrated in the Bank's commitment to transparency and disclosure. Following 18 months of extensive internal and external consultation and review, the EBRD completed a formal review of its [Public Information Policy 2014](#). As a result of this work, the Bank's Board of Directors considered and approved a new Access to Information framework in 2019.
2. This new Access to Information framework – comprised of the [Access to Information Policy](#) (AIP) 2019 and [Directive on Access to Information](#) (Directive) – sets out how the EBRD discloses information and consults with its stakeholders to promote awareness and understanding of its activities. The full text of the AIP and Directive is published on the EBRD's website.
3. The AIP requires the EBRD Secretary General to report to the Board annually on its implementation and that the report be published on the Bank's website.
4. This inaugural *Report on Implementation of the Access to Information Policy* introduces the new framework and outlines the Bank's activities in implementing this new framework during its first calendar year of operation: 1 January to 31 December 2020 (the Reporting Period). Though the AIP contemplates review and amendment of the Directive, the Bank has reviewed operation of the Directive during the Reporting Period and does not propose any changes at this time.

## Highlights of 2020

5. **The EBRD finalised implementation of the AIP and Directive**, working extensively across the organisation to ensure immediate and ongoing compliance with the new framework. Multiple teams worked to streamline and secure behind-the-scenes processes to manage and govern the Bank's information and to ensure ongoing compliance with the AIP's requirements. Moreover, the Access to Information function embarked on a multi-stage project to embed transparency into the Bank's day-to-day practices. This included the preparation and dissemination of training materials, automation and simplification of information-sharing between different EBRD systems, and harmonisation of the mechanisms for disclosure of information in relation to the Bank's operations.
6. **The Bank began to deliver in accordance with its revised transparency framework**, including on key changes such as: proactive disclosure of information on environmental, social and governance matters; expansion of the scope of projects in relation to which the EBRD discloses project summary documents (PSDs); enhancement of PSD content to include more information on the Bank's [additionality](#); environmental and social impacts and performance assessment; and extension of the information disclosed in relation to state-sector projects through proactive disclosure of state-sector Board reports. These developments provide a more comprehensive view of the EBRD's overall activities, enhance disclosure of the strategic and market context of Bank transactions, and support the Bank's promotion of [transition impact](#).
7. **The EBRD complied with all requirements imposed by the AIP and Directive**, except for the late disclosure of eight project summary documents (PSDs) in relation to projects approved as part of the Bank's response to Covid-19. Details of these late disclosures are set out in paragraph 66 below.
8. **In 2020, Publish What You Fund (PWYF) recognised that the EBRD had made substantial improvements in its transparency practices**. The Bank continued to report its activity under the International Aid Transparency Initiative (IATI) standard during 2020. In June 2020, the civil society organisation (CSO) Publish What You Fund released the seventh edition of its Aid Transparency Index, which rated 47 organisations including bilateral donors, multilateral development finance institutions, humanitarian agencies, intergovernmental organisations and a philanthropic foundation in relation to the transparency of their investments (including any gaps in publishing data to the IATI standard). In the 2020 edition, the EBRD was given a 'good' rating for the first time. This reflects a marked improvement on the previous 'fair' rating in the 2018 index and a 'poor' rating in 2014. The result is particularly noteworthy given the Bank's focus on private-sector investments. Indeed, PWYF notes in its report that development finance institutions that achieved the highest scores (and therefore the top rankings on the Index) are only publishing projects in their sovereign portfolio. The EBRD will continue

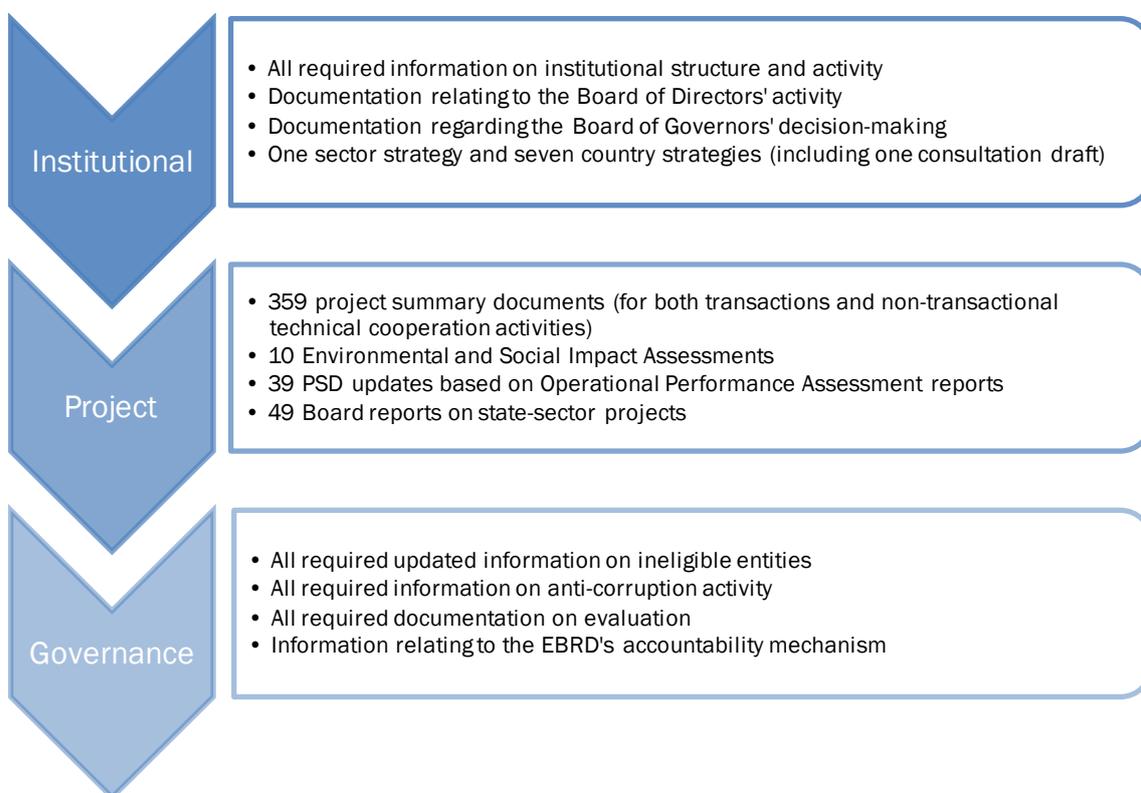
to engage and work with Publish What You Fund throughout 2021 to investigate further potential for improvements to its IATI reporting, especially through the publication of additional data points related to procurement, audits, results and evaluations, as recommended by PWYF.

9. **The Bank responded promptly and effectively to Covid-19**, a crisis that has caused significant economic disruption in the EBRD regions. To maintain the timely delivery and efficacy of projects formulated in response to the pandemic, the Bank’s President approved a deviation from the ordinary timelines for disclosure of project-specific information, detailed below from paragraph 62 onwards. Details of the Bank’s response to Covid-19, including in relation to stakeholder engagement and transparency, are outlined in this report.

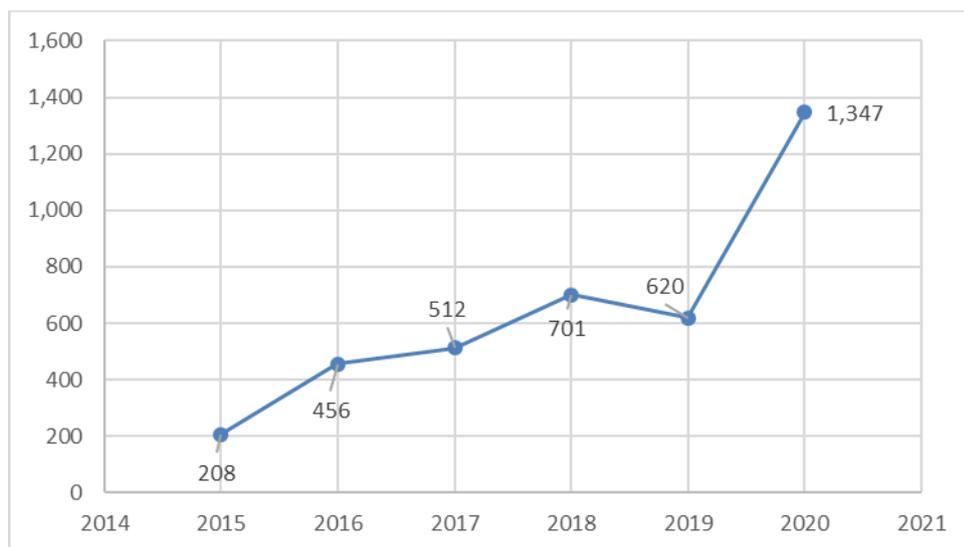
## Implementation of the AIP – a snapshot

10. Section IV of the Directive outlines the documentation and information to be disclosed by the EBRD as a matter of course. Figure 1 summarises details of the Bank’s disclosure of these materials. More detail is available later in this report.
11. The Access to Information Policy, which can be found on a [dedicated page](#) of the Bank’s website, sets out principles and processes for the EBRD’s practices of stakeholder disclosure and consultation. During 2020, the Bank proactively disclosed information as detailed in Figure 1 below.

**Figure 1. Documentation disclosed**



**Figure 2. Trends in requests for information**



## Proactive disclosure

Section IV of the Directive on Access to Information provides for proactive disclosure of particular types of information by the EBRD. Details of this disclosure during the Reporting Period are set out in this section.

### Institutional information

During the Reporting Period, the Bank disclosed a broad range of institutional information on its website:



Institutional information disclosed by the Bank during 2020 includes:

- [a schedule](#) of Board discussions, including, at any point in the year, agenda items for the two forthcoming Board meetings
- [minutes](#) of 27 Board meetings held in 2020, posted online after approval by the Board of Directors<sup>1</sup>
- [membership](#) of the Board of Directors and its constituent committees
- an EBRD [organisational chart](#), updated regularly to reflect key changes in staff
- copies of the Bank's [Strategic and Capital Framework](#), and annual [Strategy Implementation Plan](#)
- salaries of senior management and Directors (within the [Financial Report 2019](#))
- information on the work of the EBRD [Administrative Tribunal](#) (posted online and kept updated, as required).

<sup>1</sup> Due to capacity constraints within the EBRD in early 2021, minutes for two Board meetings held in 2020 have not yet been finalised, but will be published on the Bank's website following their approval by the Board of Directors.

## Policies and strategies

12. Six country strategies were approved in 2020. Table 1 sets out details of their public consultation and approval. The country strategies that the Board approved in 2020 were posted online, supplemented by summaries of associated public comments.
13. During the Reporting Period, four draft [country strategies](#) (and translations into relevant official national languages) were posted for comment on the EBRD's website prior to Board approval, as required by the Access to Information Policy. Of these strategies, one had a consultation period which ran into 2021. Once approved, final versions of these policies were then also disclosed on the Bank's website.

**Table 1. Draft, Board-approved and translated country strategies in 2020**

| Country    | Dates of public consultation        | Board approval date        | Date final strategy posted on ebrd.com (date translation posted, if different) |
|------------|-------------------------------------|----------------------------|--|
| Bulgaria   | 31 October to 15 December 2019      | 15 January 2020            | 15 January 2020  |
| Jordan     | 13 November to 28 December 2019     | 27 January 2020            | 29 January 2020  |
| Albania    | 3 December 2019 to 17 January 2020  | 12 February 2020           | 13 February 2020   |
| Tajikistan | 19 December 2019 to 2 February 2020 | 26 February 2020           | 27 February 2020 (20 August 2020)  |
| Romania    | 7 February to 23 March 2020         | 23 April 2020              | 23 April 2020 (24 April 2020)  |
| Greece     | 20 July to 3 September 2020         | 21 October 2020            | 22 October 2020 (23 October 2020)  |
| Hungary    | 27 November 2020 to 11 January 2021 | 10 March 2021 <sup>2</sup> | 11 March 2021  |

14. During the Reporting Period, the Board also approved the following [sector strategy](#):

**Table 2. Sector strategy approved in 2020**

| Sector                                     | Board approval date | Date posted on ebrd.com |
|--|---------------------|-------------------------|
| Information and Communication Technologies | 17 January 2020     | 20 January 2020         |

## Project information

15. The EBRD's primary mechanisms for informing the public about its projects are project summary documents (PSDs) and associated materials disclosed on ebrd.com. This information – disclosed throughout the project lifecycle (from design to implementation and project maturity) – is intended to ensure that stakeholders are informed about Bank operations.

<sup>2</sup> This strategy is currently scheduled for discussion by the Bank's Board of Directors on 10 March 2021. This date remains subject to change. The strategy will be included in the AIP Implementation Report 2021.

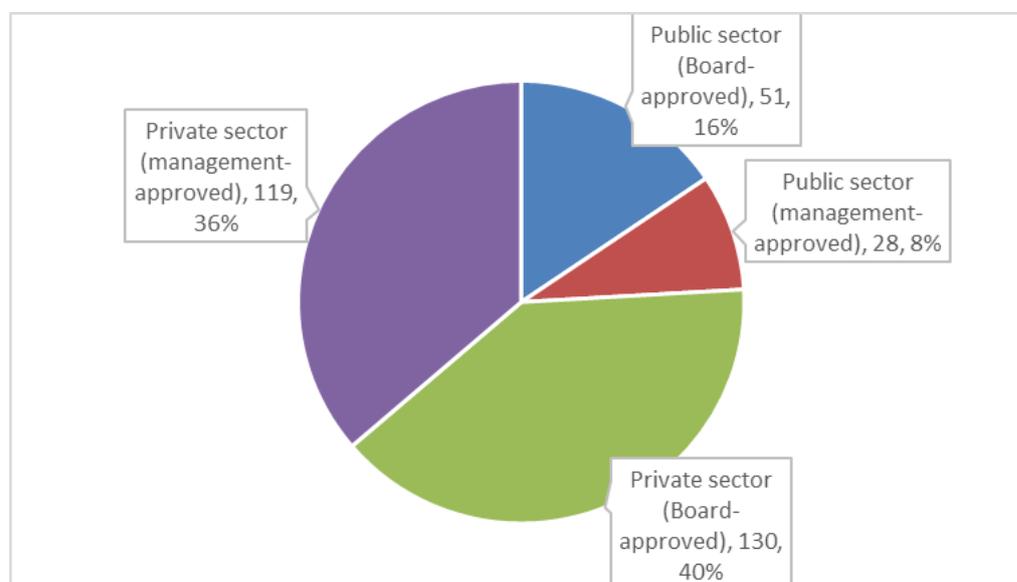
16. During the Reporting Period, the ebrd.com PSD page received a total of 152,220 views. Reflecting the importance of these materials to the Bank's stakeholders, the number of subscribers to PSD publications increased from 10,614 in 2019 to 13,451 in 2020.

### Project summary documents

17. The EBRD recognises the importance of PSDs to its stakeholders. In order to facilitate information disclosure and analysis in relation to EBRD projects, the Bank introduced two new features in 2020: the Project Finder and the Related Materials functionality. The new Project Finder feature provides simple access to all project-related information – whether a user is seeking something specific or browsing for a more general understanding of the EBRD's work in any country or sector. This new joined-up process, and the Related Materials function which appears on all PSDs, permits easy viewing of all available documentation in relation to a project, including any disclosed procurement notices, environmental documentation and Board reports.

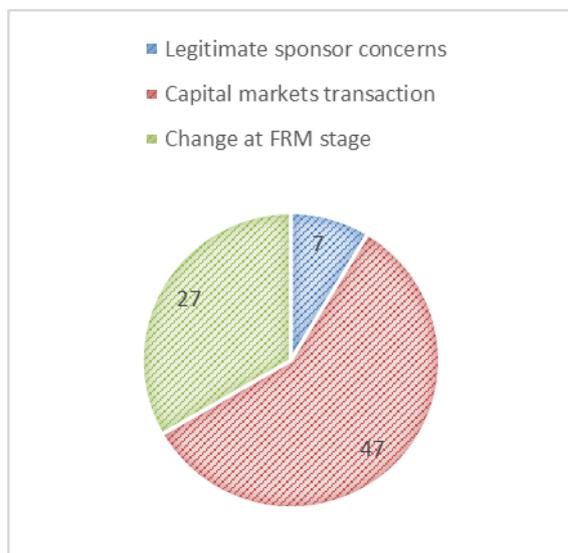
18. In 2020, PSDs for 328 projects were disclosed on the Bank's website. Of these, 181 related to projects prepared for consideration by the Board of Directors and 147 related to projects prepared for consideration by Bank management under delegated authority from the Board. Except as detailed in paragraph 66 below, all published PSDs complied with the AIP.

Figure 3. PSDs published in 2020



19. Of the 328 PSDs published during the Reporting period, EBRD management granted deferrals in relation to the publication of 79, in each case authorised in accordance with the terms of the Access to Information framework. Since the granting of these deferrals, seven projects have been cancelled (negating the need for a PSD), several have been delayed or deferred due to changes in economic conditions arising from the Covid-19 crisis, and PSDs have been published in relation to 57. PSDs for the remaining projects will be published when the triggers for their release have been met.

**Figure 4. PSDs deferred in 2020**



Note: The stated legitimate reasons for deferral exceed the number of actual deferrals because, in some cases, there was more than one reason for the request.

20. As of the date of this report, local-language translations have been provided for all but one of the PSDs published during the Reporting Period.

### PSDs for non-transactional technical cooperation projects over €300,000

21. As required by section IV, paragraph 1.4.3 of the Directive, 31 PSDs for non-transactional technical cooperation projects over €300,000 were published on the Bank's website in 2020.

### Cancelled or inactive projects

22. As required by Section IV, paragraph 1.4.10 of the Directive, during the Reporting Period the PSD for one project (a state-sector project cancelled in November 2018) was removed from the Bank's website.

### PSD updates: Operational Performance Assessment

23. In 2020, the Bank began to update PSDs to incorporate information about evaluation of its projects. During the Reporting Period, summaries of the Operational Performance Assessment (OPA) reports prepared in relation to 40 projects were disclosed on the EBRD's website.<sup>3</sup>

<sup>3</sup> OPAs are conducted in relation both to projects approved by the Board of Directors and those approved by management. Prior to 2020, PSDs were not generally disclosed in relation to projects approved by management. As a result, summaries of OPAs carried out in relation to these projects have not been disclosed on the EBRD's website.

## Board reports on state-sector projects

24. In 2020, the EBRD began to disclose the Board reports prepared in relation to state-sector projects proactively, subject to the removal of any confidential information. The Bank disclosed Board reports for 49 projects approved during the Reporting Period.
25. Except where deferred in accordance with the AIP (that is, where deferral is aligned with the deferral of disclosure of a project's PSD), these Board reports are disclosed within 30 days after Board approval of the project.<sup>4</sup>

## Operational Performance Assessment reports on state-sector projects

26. Among the new proactive-disclosure requirements imposed by the AIP is the disclosure of OPAs conducted in relation to state-sector projects, subject to the removal of any confidential information. The EBRD will commence these disclosures from 1 July 2021, following review and revision of the Bank's OPA template.

## Project-related environmental information

27. During 2020, four Category A projects were submitted to the Board of Directors for their approval. Disclosure of PSDs for all of these projects met the relevant required minimum disclosure period imposed by the AIP (30 days prior to Board approval for private-sector projects, 60 days prior to Board approval for state-sector projects).
28. The EBRD disclosed Environmental and Social Impact Assessments (ESIAs) in relation to 10 Category A projects in 2020. In relation to each, it made a full ESIA disclosure package available online – both on the Bank's website (linked to the relevant project PSD – 60 days prior to Board approval for private-sector projects, 120 days prior to Board approval for state-sector projects) and on the client's website – in English and in relevant local languages. PSDs were also cross-linked with ESIAs for six Category A projects.
29. Table 3 sets out details of these disclosures:

**Table 3. Summary of [Category A disclosure or Board review](#) in 2020**

| Country    | Project name                                    | State/private | Disclosure date  | Board date                | Days public | Languages          |
|------------|---|---------------|------------------|---------------------------|-------------|--------------------|
| Ukraine    | <a href="#">Khmelnytsky Solid Waste Project</a> | State         | 28 February 2020 | 02 September 2020         | 186         | English, Ukrainian |
| Poland     | <a href="#">Project Debsk</a>                   | Private       | 26 March 2020    | 24 June 2020              | 90          | English, Polish    |
| Uzbekistan | <a href="#">Indorama Agro Capex Loan</a>        | Private       | 24 April 2020    | 27 January 2021           | 278         | English, Uzbek     |
| Mongolia   | <a href="#">Erdene Resource Development</a>     | Private       | 12 June 2020     | 11 June 2019 <sup>5</sup> | n/a         | English, Mongolian |

<sup>4</sup> During the Reporting Period, disclosure of two state-sector Board reports was deferred in accordance with the AIP.

<sup>5</sup> This project, approved by EBRD management in 2019, is classified as environmental Category B under the Bank's Environmental and Social Policy. On that basis, disclosure of an ESIA would not ordinarily be required. This ESIA was prepared and disclosed in compliance with a condition of the Bank's equity financing, rather than as a result of an obligation imposed by the Access to Information Policy.

| Country         | Project name   | State/<br>private | Disclosure date  | Board date      | Days<br>public | Languages                     |
|-----------------|--|-------------------|------------------|-----------------|----------------|-------------------------------|
| Egypt           | <a href="#">Damietta Port Modernisation</a> **                                     | State             | 23 June 2020     | tbc             | tbc            | Arabic,<br>English            |
| Montenegro      | <a href="#">Main Roads Reconstruction Project</a> (Tivat-Jaz, Section 3)**         | State             | 7 August 2020    | tbc             | tbc            | English,<br>Montenegrin       |
| Egypt           | <a href="#">Red Sea Wind Energy 500 MW Wind Power Project (Gulf of Suez II)</a> ** | Private           | 7 August 2020    | tbc             | tbc            | Arabic,<br>English            |
| Uzbekistan      | <a href="#">Svrdarva Power Project</a>   | Private           | 16 October 2020  | 27 January 2021 | 117            | English,<br>Russian,<br>Uzbek |
| Jordan          | <a href="#">MR3: Al Ghabawi Septic Tank Facility</a> **                            | State             | 19 November 2020 | tbc             | tbc            | Arabic,<br>English            |
| North Macedonia | <a href="#">Road Corridor VIII - Phase I</a> **                                    | State             | 11 December 2020 | tbc             | tbc            | English,<br>Macedonian        |

\*\* This project is intended for discussion and approval during the course of 2021, but has not yet been scheduled.

30. In addition, PSDs for 167 Category B projects were published with enhanced environmental and social sections, providing more detailed information. Seventeen PSDs for Category B projects had non-technical summaries attached or linked to on the relevant client's webpage.

31. The EBRD published portfolio information on the environmental and social issues raised by projects approved during the 2018 calendar year in its *Sustainability Report 2019*, published on the Bank's website in June 2020.

## Environmental, social and governance information

32. Reflecting its commitment to matters of transparency and disclosure, the Bank published additional information relating to environmental, social and governance issues during the Reporting Period.

33. In compliance with a new obligation imposed by the Directive, the Bank began to disclose certain environmental, social and governance information on its website, including information regarding:

- a. the EBRD's carbon footprint
- b. the Bank's policy on diversity and inclusion, and associated reporting
- c. the EBRD Staff Regulations
- d. the EBRD's procedures for dealing with harassment or improper behaviour in the workplace
- e. the EBRD's procedures for reporting and investigating suspected misconduct, and
- f. the operation of the EBRD Staff Council, including its constitution, bylaws and working arrangements.

34. During the Reporting Period, the Bank disclosed the Sustainability Report 2019, outlining portfolio information on the environmental and social issues raised by projects approved during the 2019 calendar year. The Environmental and Social Department also commenced work on disclosure in accordance with the Global Reporting Initiative (GRI) standards.

## Stakeholder liaison

### Relations with civil society

35. As part of the EBRD's [Solidarity Package tackling the impacts of Covid-19](#), the Bank maintained regular strategic dialogue with representatives of civil society throughout 2020. Moreover, country, sector and thematic consultations and information sessions with CSOs planned prior to Covid-19 were successfully organised and delivered using various online platforms.
36. The EBRD's Civil Society Engagement (CSE) team organised over 20 online consultations and workshops attended by more than 200 participants from the EBRD regions, to gather information on how the pandemic is affecting vulnerable segments of the population. This critical work also provided important findings on how the EBRD can support the resilience of local communities and CSOs through its [Civil Society Capacity Enhancement Framework](#) (CSCEF).<sup>6</sup>
37. In 2020, the CSCEF comprised 29 technical cooperation projects totalling around €7 million, covering the standard pillars: sustainable energy and resources, economic inclusion, and good governance. During 2020, supporting digital transformation of the civil society sector was identified as a critical area of the EBRD's engagement with civil society. As a result, digitalisation has been added to the CSCEF as an additional cross-cutting pillar that aims to respond to the needs of civil society during periods of crisis. The CSE team is working to implement a range of programmes under the CSCEF to tackle these issues.
38. As identified in the EBRD's [Strategic and Capital Framework](#), digital transformation is a critical area of the Bank's engagement in relation to civil society. CSOs play an important role in addressing the Covid-19 response, as the social and economic effects of the pandemic hit them hardest. The EBRD has started to implement activities aimed at supporting CSO resilience and sustainability through the promotion of digital inclusion and the enhancement of capacity for digital transformation.
39. The EBRD continues to focus on forming successful partnerships with civil society organisations to foster new opportunities and support effective project implementation, thereby enabling the Bank to multiply its impact in supporting CSOs in the EBRD regions. In 2020 partnership agreements were signed with prominent international NGOs and international organisations, such as Save the Children, the United Nations Office on Drugs and Crime, Open Contracting Partnership and Oxfam, which led to the implementation of joint projects.
40. In lieu of the Civil Society Programme at the EBRD's Annual Meeting, the Bank organised the first virtual meeting between the EBRD's Board of Directors and civil society organisations. Almost 70 CSOs from 19 countries participated.
41. As in previous years, approximately 2,200 CSO contacts registered with the EBRD received regular information updates about the EBRD's latest developments. These contacts were notified about upcoming consultations regarding EBRD policies and country and sector strategies through dedicated webpages for civil society, a quarterly EBRD CSO newsletter, targeted email notifications and alerts, and the use of social media platforms such as Facebook and Twitter.
42. Due to the Covid-19 pandemic, face-to-face CSO business-as-usual consultations, visits by the EBRD President, and Board consultation visits were either cancelled or adapted to a virtual setting.

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<sup>6</sup> This is a framework through which the Bank seeks to establish partnerships and provide support to a wide range of civil society actors.

## The EBRD website

43. The EBRD's main corporate communications platform, its website, ebrd.com, registered record levels of traffic in 2020, including a 23 per cent increase in users during the Reporting Period. Meanwhile, the Communications Department continued its campaign to grow the number of subscribers and their subscriptions to the team's email delivery system, supplied by GovDelivery.
44. Other metrics also recorded improved results (detailed below). The increase in traffic was achieved despite a notable decline in numbers at the start of the first lockdowns in EBRD economies in the spring.

**Table 4. Metrics on use of the Bank's website**

|          | Web traffic | User sessions | Page views | Subscribers | Subscriptions <sup>7</sup> |
|----------|-------------|---------------|------------|-------------|----------------------------|
| 2019     | 1,405,808   | 2,608,823     | 6,316,497  | 101,192     | 1,728,303                  |
| 2020     | 1,726,829   | 3,002,737     | 6,543,441  | 119,407     | 2,321,722                  |
| Increase | 23%         | 15%           | 3%         | 18%         | 34%                        |

45. One-off factors which helped account for the rise in website users included: content about Chernobyl, an EBRD/London School of Economics event about the United Nations Sustainable Development Goals, a promotion for the Advice for Small Businesses programme in Greece, and continued interest in the Belt and Road Initiative.
46. In parallel with publishing content on the main corporate website, the Communications Department engaged with very large audiences on social media platforms. The total number of followers of the main EBRD social media accounts increased 21 per cent to 257,592 during the course of the year. EBRD content attracted 205,091 engagements across all platforms, with the Bank's LinkedIn account reaching just under six million organic impressions.

## Accountability and governance information

### Compliance information

47. **Ineligible entities** – Following the entry into force of the Agreement on Mutual Enforcement of Debarment Decisions between the EBRD, the African Development Bank Group, the Asian Development Bank, the Inter-American Development Bank and the World Bank Group, the EBRD cross-debarred 196 entities and 22 individuals during the Reporting Period, in line with its obligation to recognise and enforce debarment notices from other parties to that agreement.
48. **Debarment notices** – Following proceedings instituted under the Bank's Enforcement Policy and Procedures, the Bank issued debarment notices against two individuals and three entities during the course of 2020.
49. **Anti-corruption reports** – During 2020, the EBRD Office of the Chief Compliance Officer issued its annual Integrity and Anti-Corruption Report on matters arising during the 2019 calendar year, which was published and posted on the Bank's website.

### Independent Project Accountability Mechanism

50. On 1 July 2020, the Independent Project Accountability Mechanism (IPAM) started operating under the 2019 Project Accountability Policy, with the designation of Victoria Marquez-Mees as the EBRD's first Chief Accountability Officer, and replaced the Project Complaints Mechanism (PCM) as the EBRD's accountability mechanism. The 2019 Project Accountability Policy (PAP) provides IPAM with greater

<sup>7</sup> Note that subscribers can sign up to multiple streams of content, by location and sector.

independence and transparency compared with the PCM as a stand-alone unit, reporting directly to the Board of Directors, with an enhanced mandate covering four functions: problem-solving, compliance review, outreach and advisory.

51. During 2020, 47 requests were managed; 14 cases transferred from previous years and 33 new requests received, of which seven were registered.
52. By the end of the year, the portfolio of cases for which management would continue into 2021 included 13 active cases. All of these cases are being managed under the 2019 PAP, with the exception of one case undergoing compliance review, which remains under the 2014 Rules of Procedure.
53. During 2020, IPAM developed a new Case Registry that includes – in addition to material contained in the previous Registry – individual case summaries that provide summarised information about the request and the project. The new Case Registry also contains a case tracker, with all IPAM case documents disclosed by stage of processing.
54. As of 31 December 2020, all cases in the portfolio were up-to-date in relation to reporting, and engagement with requesters to review case status has been ongoing. A total of 17 reports were disclosed during the second semester in the IPAM Case Registry:

**Table 5. Reports disclosed by IPAM during 2020**

| Case number             | Case name  | Documents disclosed   |
|-------------------------|--|---|
| <a href="#">2020/07</a> | Tumad Gold Mines Development ( <a href="#">49041</a> )***                            | ----  |
| <a href="#">2020/06</a> | <a href="#">Corridor VC in FBH- Part 3 (49058)</a>                                   | Assessment report   |
| <a href="#">2020/05</a> | UPTF - Mariupol Trolleybus Project ( <a href="#">47901</a> , <a href="#">50503</a> ) | Assessment report   |
| <a href="#">2020/04</a> | Corridor Vc 2 ( <a href="#">47372</a> )  | Assessment report   |
| <a href="#">2020/03</a> | Saint Gobain Construction Products Russia ( <a href="#">42659</a> )                  | Assessment report   |
| <a href="#">2020/02</a> | Lydian (Amulsar Gold Mine)- Extension ( <a href="#">48579</a> )                      | Assessment report<br>Compliance assessment report                     |
| <a href="#">2020/01</a> | Kvesheti Kobi Road Project ( <a href="#">50271</a> )                                 | Compliance assessment report  |
| <a href="#">2019/02</a> | Belgrade Solid Waste PPP ( <a href="#">46758</a> )                                   | Compliance review report  |
| <a href="#">2019/01</a> | Shuakhevi HPP (Request #2) ( <a href="#">45335</a> ) ***                             | ---   |
| <a href="#">2018/09</a> | MHP Corporate Support Loan and MHP Biogas ( <a href="#">47806,49301</a> )            | Problem-solving report  |
| <a href="#">2018/08</a> | Nenskra HPP ( <a href="#">46778</a> )  | Compliance review report<br>Management action plan<br>Monitoring plan |
| <a href="#">2018/03</a> | Shuakhevi HPP ( <a href="#">45335</a> )  | Problem-solving report  |
| <a href="#">2018/01</a> | Kozloduy International Decommissioning Support Fund***                               | ----  |
| <a href="#">2017/10</a> | CMI Offshore Regional ( <a href="#">47096</a> )                                      | Monitoring report   |
| <a href="#">2017/09</a> | BEH Bond Issue ( <a href="#">48556</a> )   | Monitoring report   |
| <a href="#">2017/07</a> | Lukhoil Shah Deniz Stage II ( <a href="#">46766</a> )                                | Monitoring report   |

| Case number             | Case name   | Documents disclosed |
|-------------------------|---|---------------------|
| <a href="#">2017/05</a> | South East Europe Equity Fund ( <a href="#">34894</a> ) | Monitoring report   |
| <a href="#">2015/03</a> | Turk Traktor ( <a href="#">44173</a> )                  | Monitoring report   |

\*\*\* Please note that no reports were due for this case during this period and therefore none were issued. For updates on a case status, the case summary can be accessed by clicking on the case number.

## Evaluation information

55. During the Reporting Period, the Evaluation Department (EvD) prepared the evaluation documents shown in Table 6 for disclosure by the Bank:

**Table 6. Evaluation documentation disclosed in 2020**

| Document type                                    | Examples disclosed during the Reporting Period   |
|--|--|
| EvD annual reporting                             | <a href="#">Evaluation Work Programme and Budget 2020</a><br><a href="#">Annual Evaluation Review 2019</a>   |
| Special and thematic studies and approach papers | <a href="#">EBRD Women in Business Programme in Turkey</a><br><a href="#">Project Self-evaluation in EBRD - EvD Discussion Paper for Management Working Group and Board of Directors</a><br><a href="#">EBRD-Ukraine Stabilisation and Sustainable Growth Multi-Donor Account</a><br><a href="#">Projects Supporting Cross-Border Connectivity (Regional Integration)</a><br><a href="#">EBRD Mobilisation of Private Finance</a><br><a href="#">EvD Evaluation of the Legal Transition Programme</a><br><a href="#">Discussion Paper - Evaluability assessment of EBRD's Transition Qualities</a><br><a href="#">Hydrocarbons Projects – Approach Paper</a><br><a href="#">Nominee Directors – Approach Paper</a><br><a href="#">Sustainable Infrastructure in Advanced Transition Countries – Approach Paper</a> |
| Operational evaluation summaries                 | <a href="#">Cluster Review: Mining Operations in Mongolia</a>  |

## Other disclosure

56. During the Reporting Period, the EBRD prepared and disclosed a number of reports, including the following:

- a. [Annual Review 2019](#)
- b. [Financial Report 2019](#)
- c. [Sustainability Report 2019](#)
- d. [Transition Report 2020-21 – The State Strikes Back](#)

- e. [Annual Procurement Review 2019](#)
- f. [Annual Corporate Procurement Review 2019](#)
- g. [Task Force on Climate-Related Financial Disclosures Report 2019](#)
- h. [Public Information Policy Implementation Report 2019](#).

57. The Bank's Environmental and Social Advisory Council held a meeting on 4 February 2020, the minutes of which have been disclosed on the EBRD's website.

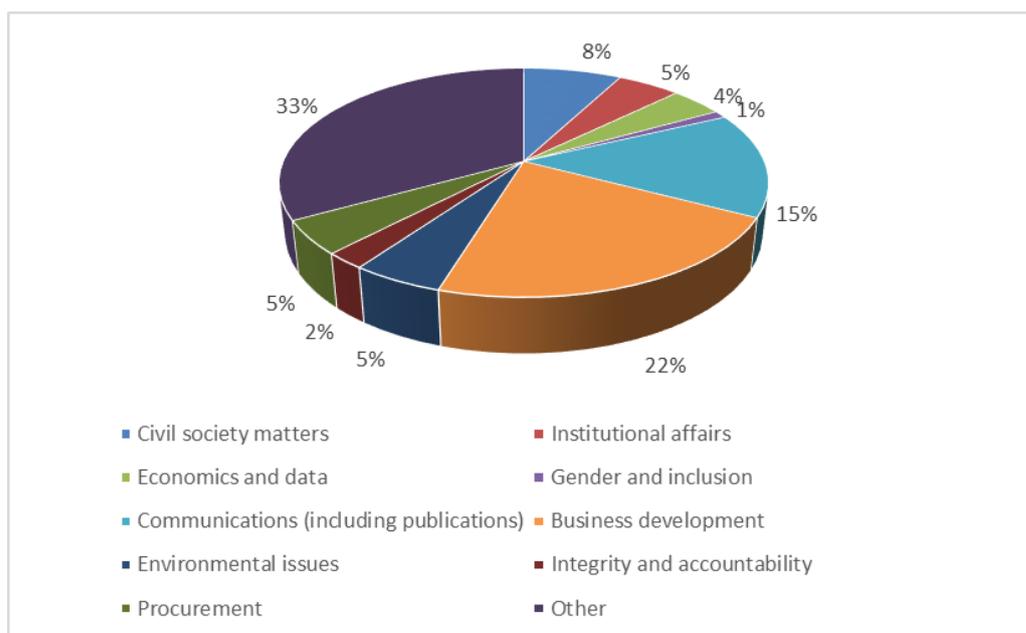
## Requests for information

58. The Bank receives requests for information through a request form available on the EBRD's Request for Information page, through various mailboxes listed on the Bank's website and by means of direct requests to staff members.

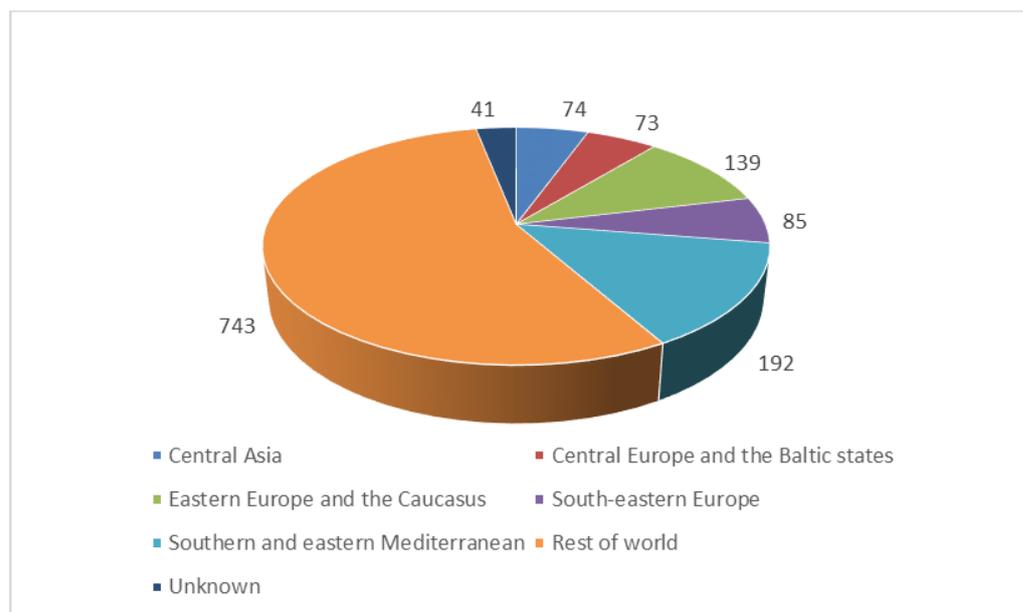
59. Over the past five years, the EBRD has seen a significant increase in the number of requests for information. This increase can be attributed to many factors, including the growing prevalence of internet access, a redesign of the Bank's website, and the disclosure by the EBRD of an expanding scope of information – thereby increasing stakeholder engagement.

60. During the Reporting Period, the Bank received 1,347 requests for information through these channels. The EBRD responded to all requests for information in accordance with the timelines set out in the AIP. Details of the requests for information received by the Bank (and of those who requested this information, where provided) are set out in Figures 5 and 6.

**Figure 5. Requests for information, by area of interest**



**Figure 6. Requests for information, by requester location**



## Covid-19 and access to information

### Response to Covid-19

61. The year 2020 was dominated by the Covid-19 pandemic, which caused dramatic social and economic disruptions worldwide. With a view to providing finance and rapid advisory and policy support to help businesses and government combat the economic and societal implications of the virus, the EBRD scaled up its existing instruments and developed new initiatives. On 13 March 2020, evidencing the EBRD's commitment to being a strong and reliable partner for the economies where it invests, the Bank's Board of Directors approved the Covid-19 Solidarity Package. This was the first phase of the EBRD's work in response and recovery – a series of measures designed to meet the short-term liquidity and working-capital needs of Bank clients.
62. To ensure the timely and efficacious delivery of crisis-response projects, the Solidarity Package offered fast-track restructuring for distressed clients and contemplated the streamlining certain Bank processes. Arrangements for implementing the Solidarity Package included approval by the EBRD President of a deviation from the ordinary timelines for disclosure of project-specific information for crisis-response projects. This deviation, approved in accordance with Section IV, paragraph 1.4.2 of the Directive, permitted deferred disclosure of PSDs for projects approved under the EBRD Covid-19 Solidarity Package (excluding Category A projects). However, to maintain the Bank's high standards of accountability and transparency, PSDs for Solidarity Package Phase 1 projects were required to be disclosed as soon as practicable, and in any event not later than the date of signature of the project.
63. Facing the deepening impacts of the coronavirus pandemic, and national responses to it, on 23 April 2020 the Board approved Phase 2 of the Solidarity Package. This expanded the scope of emergency-response financing available to both new and existing Bank clients. In order to implement the expanded scope of the Solidarity Package, the EBRD President amended the scope of the deviation to ordinary PSD disclosure timelines to include these types of projects (excluding Category A projects). As in relation to the Resilience Framework, this deviation required disclosure of PSDs as early as practicable, but in any event not later than:
- a. 30 days before consideration of a project by the Board of Directors, for projects under the Vital Infrastructure Support Programme, and
  - b. the date of signing, for projects approved under the Resilience Framework, Direct Financing Facility Framework and Financial Intermediaries Framework.

64. Between the first approval of the Solidarity Package on 13 March 2020 and 31 December 2020, 201 projects affected by the deviation were approved as part of the Bank's Covid-19 response.
65. **Non-compliant PSDs:** During 2020, as EBRD staff adjusted to remote working and new processes designed in relation to the Solidarity Package, PSDs for eight projects were disclosed later than permitted by the deviation. In seven of these cases, which occurred in May and June, PSDs were submitted for publication on time – their disclosure (two to three working days after signature) was the result of final clearance processes undertaken in relation to PSDs prior to publication on the EBRD's website. Following implementation of additional checks and internal guidance, the position improved significantly, as evidenced in Table 6 above. The PSD for one operation under the Resilience Framework (Tajikistan: Arvand Bank) should have been disclosed by 30 July 2020, but was only published on 3 September 2020 due to an administrative error.
66. On review of the Solidarity Package in late 2020, the Board of Directors recognised that the economic repercussions of the Covid-19 pandemic are still being felt throughout our regions. The EBRD's response will continue to be marked by the agility and flexibility necessary to provide effective assistance to our partners as their needs evolve. To that end, with effect from 1 January 2021, the deviation was amended a second time, permitting deferred PSD disclosure only for projects approved under the Resilience Framework (excluding category A projects). PSDs for these projects are to be disclosed as early as practicable and in any event not later than the date of signing.

## Acronyms and defined terms

| Abbreviation     | Definition                                       |
|------------------|--|
| AIP              | Access to Information Policy                     |
| CSCEF            | Civil Society Capacity Enhancement Framework     |
| CSE              | Civil Society Engagement                         |
| CSO              | Civil society organisation                       |
| Directive        | Directive on Access to Information               |
| EBRD             | European Bank for Reconstruction and Development |
| ESIA             | Environmental and Social Impact Assessment       |
| EvD              | Evaluation Department                            |
| IATI             | International Aid Transparency Initiative        |
| IPAM             | Independent Project Accountability Mechanism     |
| OPA              | Operational Performance Assessment Report        |
| PAP              | Project Accountability Policy                    |
| PCM              | Project Complaint Mechanism                      |
| PSD              | Project Summary Document                         |
| PWYF             | Publish What You Fund                            |
| Reporting Period | 1 January 2020 to 31 December 2020               |

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