



European Bank
for Reconstruction and Development

Report on implementation in 2021 of the EBRD's Access to Information Policy

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Foreword

Since its establishment in 1991, the European Bank for Reconstruction and Development (EBRD) has proactively established a framework for transparency, disclosure and information-sharing, with the aim of building trust with stakeholders at all levels, and model good governance best practice consistent with its founding principles. That framework currently comprises the Access to Information Policy (AIP) and the Directive on Access to Information (Directive).

In recent years, the Bank has expanded the scope of its institutional disclosures – the EBRD was the first multilateral development bank (MDB) to sign up as a supporter of the Task Force on Climate-related Financial Disclosures in 2018, and has published increasing numbers of, and increasingly detailed, institutional documents which guide its overall direction, including the Green Economy Transition Approach, the Paris alignment methodology and clarified Energy Sector Strategy, the Strategy for the Promotion of Gender Equality, and the Digital Approach. Since the AIP framework came into effect on 1 January 2020, the Bank has continued to develop this proactive approach to transparency, including adopting a presumption of disclosure.

Further work is ongoing to enhance public disclosure at all levels of the EBRD's decision-making, and we will be seeking your views on how we can improve further in the lead-up to our review of the AIP and Directive which we will prepare for during 2023 for decision in 2024.

The Bank is proud of its track record regarding transparency and this report is an opportunity to learn more about how the AIP requirements have been delivered.

Kazuhiko Koguchi

Secretary General, European Bank for Reconstruction and Development

Introduction

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.

The EBRD's Access to Information framework – comprising the [Access to Information Policy](#) (AIP) 2019 and [Directive on Access to Information](#) (Directive) – sets out how the Bank discloses information and consults with its stakeholders to promote awareness and understanding of its activities. The full texts of the AIP and Directive are published on the EBRD's website.

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. This *Report on implementation in 2021 of the EBRD's Access to Information Policy* outlines the Bank's ongoing work to mainstream transparency, and to implement the Access to Information framework during 1 January to 31 December 2021 (the reporting period).

Although the AIP contemplates reviewing and amending the Directive from time to time, the Bank has reviewed the operation of the Directive during the reporting period and does not propose any changes at this time.

Highlights of 2021

The EBRD streamlined implementation of the AIP and Directive, working extensively across the organisation to embed automated processes to govern disclosure of the Bank's information. This included preparing and delivering targeted information sessions for Bank staff regarding their individual disclosure obligations, disseminating specific knowledge materials on individual disclosure practices, and proactive collaboration between different teams to synthesise and streamline disclosure mechanisms in relation to the Bank's operations.

The Bank increased transparency surrounding its operations by improving its timely disclosure of project-specific information relating to Covid-19 response arrangements, and extending the scope of information disclosed in relation to state-sector projects through proactive disclosure of performance assessment reports conducted at operational maturity. These developments supplement the existing comprehensive materials disclosed in relation to the EBRD's activities, and evidence the Bank's progress towards achieving its strategic objectives and transition impact.

The EBRD complied with all requirements imposed by the AIP and Directive, except for a one-day delay to the disclosure of a Project Summary Document (PSD). This late disclosure is detailed on page 10.

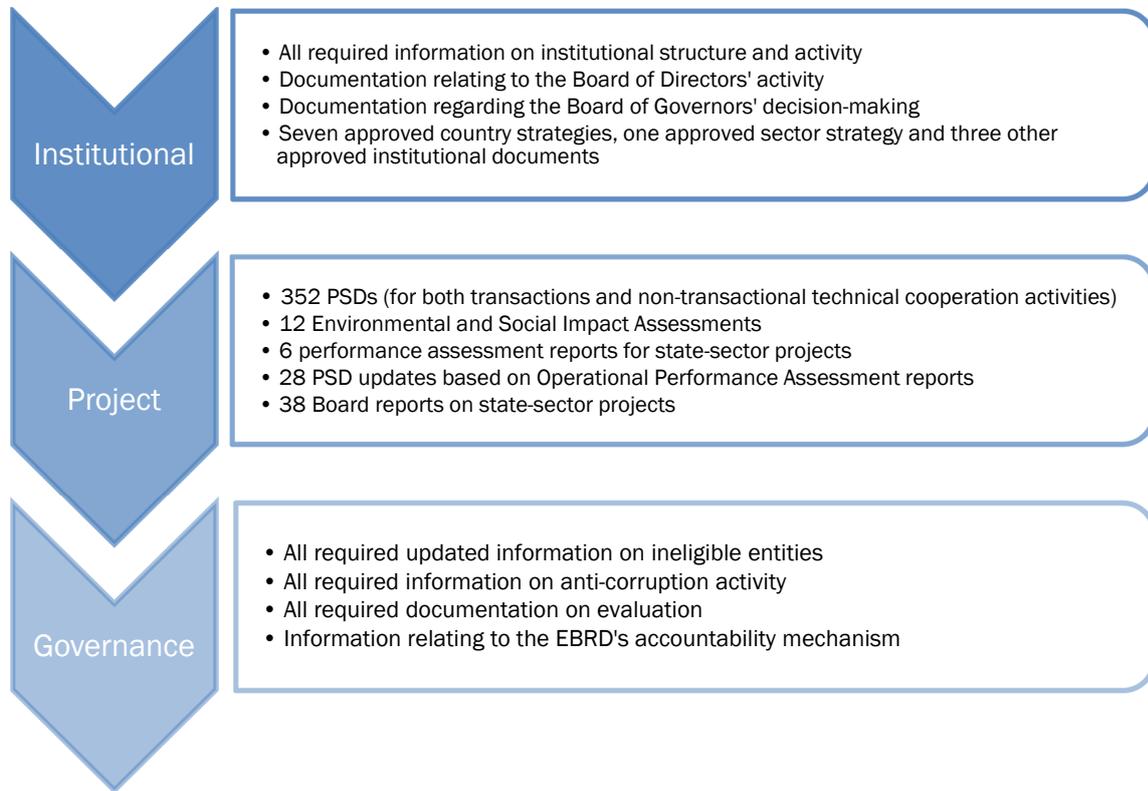
Following the 'Good' rating awarded to the Bank in 2020 by the civil society organisation (CSO) Publish What You Fund (PWYF), the EBRD continued its stakeholder engagement and information disclosure efforts. The Bank reported monthly on its activities under the International Aid Transparency Initiative (IATI) standard throughout the reporting period. Since September 2021, consistent with emerging best practice, the Bank has been publishing sovereign and non-sovereign portfolio information separately. In addition, the Bank has participated in discussions with PWYF on a number of issues including review of, and contribution to, its initiative for the formulation of a Development Finance Institutions (DFI) Transparency Tool. The EBRD will continue to work with PWYF throughout 2022 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.

The Bank continued to support its clients as they faced ongoing disruptions caused by Covid-19, in the form of timely and flexible banking services and of guidance and capacity-building on matters altered or exacerbated by the pandemic, including identification and remediation of sexual and gender-based violence, economic inclusion, good governance and digitisation.

Implementation of the AIP – a snapshot

Section IV of the Directive outlines the documentation and information to be disclosed by the EBRD as a matter of course. During the reporting period, the Bank proactively disclosed information as detailed in Chart 1 below. Additional details appear throughout this report.

Chart 1. Documentation disclosed

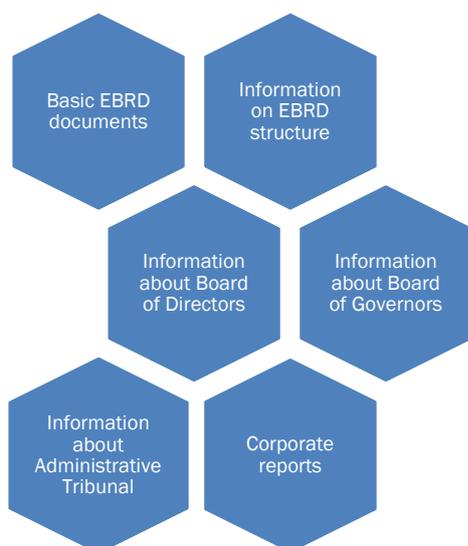


Proactive disclosure

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 2021 includes:

- [a schedule](#) of Board discussions, including – at any point in the year – agenda items for the two forthcoming Board meetings
- [minutes](#) of the 27 Board meetings held in 2021, posted online after approval by the Board of Directors
- [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 2020](#))
- information on the work of the EBRD [Administrative Tribunal](#) (posted online and kept updated, as required).

Policies and strategies

During the reporting period, 10 draft country strategies (and translations of them into relevant official national languages) were posted for comment on the EBRD's website prior to Board approval, as required by the AIP. Once approved by the Board of Directors, final versions of seven of these country strategies were disclosed on the Bank's website, supplemented by summaries of associated public comments. Table 1 sets out details of the dates of their public consultation, approval and publication.

Table 1. Country strategies approved by the Board of Directors in 2021

Country	Dates of public consultation	Board approval date	Date final strategy posted on ebrd.com (in English and in local language)
Hungary	27 November 2020 to 11 January 2021	10 March 2021	11 March 2021
Czech Republic	25 June to 9 August 2021	15 September 2021	15 September 2021
Montenegro	7 July to 21 August 2021	15 September 2021	16 September 2021
Estonia	15 June to 30 July 2021	15 September 2021	15 September 2021

Country	Dates of public consultation	Board approval date	Date final strategy posted on ebrd.com (in English and in local language)
Latvia	15 June to 30 July 2021	15 September 2021	15 September 2021
Lithuania	15 June to 30 July 2021	15 September 2021	15 September 2021
Georgia	6 October to 20 November 2021	8 December 2021	10 December 2021

Three draft country strategies posted for comment in the reporting period are planned for approval by the Board of Directors in 2022 (see Table 2).

Table 2. Country strategy consultations commenced in 2021

Country	Dates of public consultation
Kosovo	11 November to 26 December 2021 ¹
Egypt	17 November to 1 January 2022 ²
Kazakhstan	23 December 2021 to 6 February 2022 ³

The Board approved one [sector strategy](#) during the reporting period.

Table 3. Sector strategy approved in 2021

Country	Dates of public consultation	Board approval date	Date posted on ebrd.com
Financial Sector Strategy 2021-25	17 September to 31 October 2021	15 December 2021	15 December 2021

¹ This strategy is currently scheduled for discussion by the Bank's Board of Directors in early 2022, and will be included in the AIP Implementation Report 2022.

² This strategy is currently scheduled for discussion by the Bank's Board of Directors in early 2022, and will be included in the AIP Implementation Report 2022.

³ The consultation period was extended beyond the usual 45 days for an additional three weeks. This strategy is currently scheduled for discussion by the Bank's Board of Directors in early 2022, and will be included in the AIP Implementation Report 2022.

During the reporting period, the Board approved, and the Bank disclosed, three other institutional documents, as detailed in Table 4.

Table 4. Other institutional documents approved and disclosed in 2021

Document title	Dates of public consultation	Board approval date	Date posted on ebrd.com
Approach to Accelerating the Digital Transition 2021-25	n/a ⁴	10 November 2021	10 November 2021
Equality of Opportunity Strategy 2021-2025: Strengthening Human Capital across the EBRD region	29 July to 11 September 2021 ⁵	24 November 2021	24 November 2021
Strategy for the Promotion of Gender Equality 2021-2025	29 July to 11 September 2021 ⁶	24 November 2021	24 November 2021

Project information

The Bank's key tool for disclosure regarding its projects are PSDs, which received a total of 470,247 page views during 2021. Throughout the project lifecycle (from project design to implementation and maturity), the Bank discloses a PSD and other materials in relation to an individual project on www.ebrd.com. These are intended to ensure that stakeholders are informed about Bank operations.

Web users have simple access to all information disclosed in relation to a project using the Project Finder tool. During the reporting period, Project Finder received 29,474 views. Reflecting the importance of these materials to the Bank's stakeholders, the number of subscribers to PSD publications increased from 13,451 in 2020 to 13,476 in 2021.

Project summary documents

In 2021, PSDs for 310 projects were disclosed on the Bank's website. Of these, 153 related to projects prepared for consideration by the Board of Directors and 157 related to projects prepared for consideration by Bank management under delegated authority from the Board.

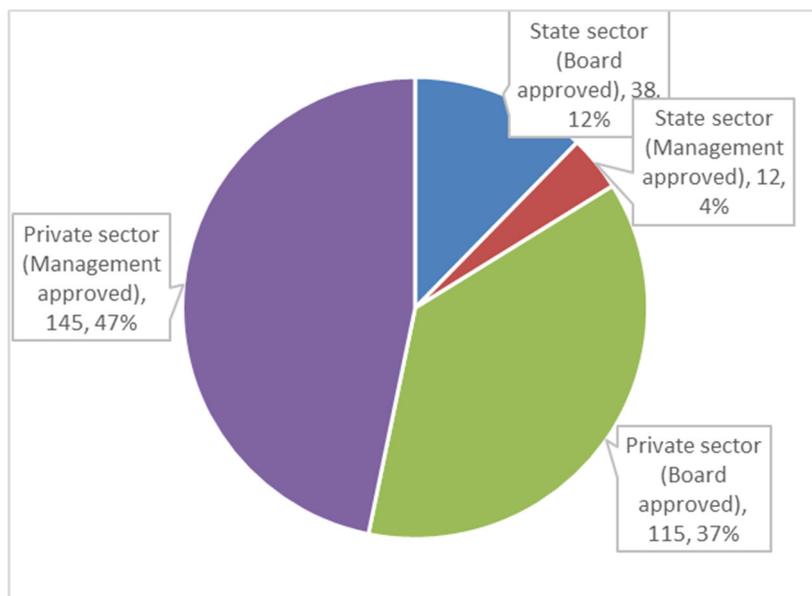
With one exception – detailed on page 10 – all PSDs disclosed during the reporting period complied with the AIP.

⁴ Throughout August and September 2021, the Bank undertook detailed consultations with MDBs, international financial institutions and CSOs.

⁵ Following publication of the strategy document in English, its executive summary was disclosed in Russian, Arabic and Turkish on 12 August 2021.

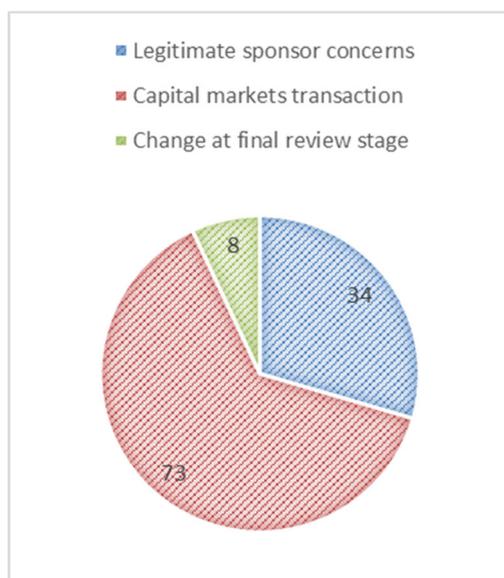
⁶ Following publication of the strategy document in English, its executive summary was disclosed in Russian, Arabic and Turkish on 12 August 2021.

Chart 2. PSDs published in 2021



EBRD management granted deferrals in relation to the publication of 105 PSDs for projects approved during the reporting period, in each case authorised in accordance with the terms of the Access to Information framework. Since these deferrals were granted, 10 projects have been cancelled (negating the need for a PSD), several have been delayed or deferred due to changes in economic conditions, 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.

Chart 3. PSDs deferred in 2021



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.

As of the date of this report, local-language translations have been provided for all but three of the PSDs published during the reporting period, two of which relate to projects in Ukraine – where the services of translators have been interrupted.

Response to Covid-19

Following review of the Solidarity Package in late 2020, and in light of ongoing disruption caused by the Covid-19 pandemic, the Bank maintained its comprehensive and flexible client support during the reporting period. However, as the economies where the EBRD invests entered a new phase of crisis response, the need to deviate from standard disclosure arrangements diminished, and the Bank's President approved a second revision to the deviation from the Directive, permitting deferred disclosure of PSDs for Resilience Framework projects (excluding Category A projects) until the end of the reporting period. Consistent with the Bank's high standards of accountability and transparency, PSDs for these projects were required to be disclosed as soon as practicable and, in any event, not later than the date of signature of the project. On average, PSDs for Resilience Framework projects were disclosed 110.9 days prior to signature. On one occasion, the PSD for a project was submitted for publication on the date of signature, but did not appear on the Bank's website until the next day.

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

As required by section IV, paragraph 1.4.3 of the Directive, 42 PSDs for non-transactional technical cooperation projects of more than €300,000 were published on the Bank's website in 2021.

Cancelled or inactive projects

As required by section IV, paragraph 1.4.10 of the Directive, during the reporting period the PSDs for three projects were removed from the Bank's website. These related to one cancelled private-sector project, and to one private-sector and one state-sector project, each of which had been inactive for more than 12 months.

PSD updates: Operational Performance Assessment

The Bank updates PSDs to incorporate evaluative information about those of its projects which reached operational maturity, and were the subject of an Operational Performance Assessment (OPA) report. Summaries of 28 OPAs prepared during the reporting period were disclosed on the EBRD's website.⁷

Board reports on state-sector projects

The EBRD proactively discloses the Board reports prepared in relation to state-sector projects, subject to the removal of any confidential information. The Bank has disclosed Board reports for all 38 state-sector projects approved during the reporting period.

Except on three occasions – where disclosure was deferred in accordance with the AIP (that is, where deferral is aligned with the deferral of disclosure of a project's deferred PSD) – these Board reports are disclosed within 30 days of Board approval of the project.

Project Assessment reports on state-sector projects

Since 30 June 2021 the Bank has been disclosing non-confidential information from OPA reports prepared in relation to state-sector projects.

During the reporting period, the Bank disclosed performance assessment reports in relation to six state-sector projects, each of which was disclosed on the Bank's website within 60 days of completion of the relevant OPA as required by the AIP.

Project-related environmental information

The EBRD disclosed Environmental and Social Impact Assessments (ESIAs) in relation to 12 Category A

⁷ PAs are conducted in relation to projects approved by the Board of Directors and to 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.

projects in 2021. In each case, the Bank made a full ESIA disclosure package available online – both on the Bank’s website and on the client’s website – in English and in relevant local languages.

These ESIA’s are linked to the relevant project PSD and, where related to a direct Bank investment, each was disclosed in accordance with the minimum disclosure period imposed by the AIP (60 days prior to Board approval for private-sector projects, 120 days prior to Board approval for state-sector projects). Table 3 sets out details of these disclosures.

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

Country	Project name	Public/private	ESIA disclosure date	Board date	Days public	Languages
Poland	Energin Banie Phase 3 Wind	Private	5 Feb 2021	13 May 2021	98	English/ Polish
Turkey	Ispartakule - Çerkezköy Railway Project	Public	1 Jun 2021	27 Oct 2021	149	English/ Turkish
Bosnia and Herzegovina	Mostar North to Mostar South Motorway	Public	9 Jun 2021	24 Nov 2021	169	Bosnian/ English
Mongolia	Choir - Sainshand transmission line	Public	29 Jun 2021	n/a ⁸	n/a	English/ Mongolian
Egypt	GrCF2W2 - Alexandria Metro	Public	12 Jul 2021	10 Nov 2021	122	Arabic/ English
Kazakhstan	Tranche 2 Construction of bypass road around the city of Kyzylorda- Zhezkazgan Road Project ⁹	Public	5 Aug 2021	8 Dec 2021	125	English/ Russian
Serbia	Serbian Solid Waste Programme (Kalenic sub-project)	Public	6 Aug 2021	8 Dec 2021	154	English/ Serbian
Romania	Cernavoda - Tritium Removal Facility	Public	12 Aug 2021	12 Jan 2022	145	English/ Romanian
Greece	Mytilineos CCGT	Private	6 Sep 2021	10 Nov 2021	66	English/ Greek
Bosnia and Herzegovina	DFF Adriatic Metals	Private	27 Oct 2021	n/a ¹⁰	n/a	Bosnian/ English

⁸ This project is in the early stages of development, and discussion by the Board of Directors is anticipated to take place during 2022.

⁹ This second tranche of the Kyzylorda-Zhezkazgan Road Project was categorised ‘A’ (2019 ESP). The ESIA package was disclosed on 5 August 2021 prior to approval of tranche 2 funding on 8 December 2021. No issues have been raised by any civil society organisations or the general public so far.

¹⁰ This ESIA does not relate directly to a direct EBRD investment (which was given environmental category B, and was approved on 6 October 2020), but to an indirect investment undertaken by the client. The client is obliged to align all activities with the EBRD’s Performance Requirements, and was required to prepare an ESIA for the Vareš mining project pursuant to its Environmental and Social Action Plan. Consistent with the EBRD’s Performance Requirements, Adriatic Metals prepared and disclosed an ESIA on 27 October 2021, prior to raising funding for the construction and operation of the mine.

Country	Project name	Public/private	ESIA disclosure date	Board date	Days public	Languages
Ukraine	Mariupol Solid Waste Project	Public	8 Nov 2021	23 Mar 2022	135	English/ Ukrainian
Morocco	Koudia Al Baida 100 MW Wind Repowering	Private	23 Dec 2021	23 Feb 2022	63	Arabic/ English/ French

In addition, PSDs for 124 Category B projects were published during the reporting period, each of which sets out enhanced environmental and social information. Nine PSDs for Category B projects had non-technical summaries attached or linked to on the relevant client's webpage.

Environmental, social and governance information

Reflecting its commitment to matters of transparency and disclosure, the Bank published additional information relating to [environmental, social and governance](#) issues on its website, including information regarding:

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

During the reporting period, the Bank disclosed the Sustainability Report 2020, outlining portfolio information on the environmental and social issues raised by projects approved during the 2020 calendar year. The Bank also published ESG disclosures in accordance with the Global Reporting Initiative (GRI) standards for the first time and fulfilled its reporting requirements to the Principles for Responsible Investment, and submitted its second annual report on the voluntary reporting framework of the Task Force on Climate-Related Financial Disclosures.

To guide Bank clients in their implementation of Performance Requirements (PRs), the Bank published additional materials, including the following guidance and good practice notes:

- briefing notes relating to PR4: Health, Safety and Security, on:
 - [underground and overhead services](#)
 - [safe excavations](#)
 - [working safely around asbestos pipes](#)
 - [safe working with mobile plant](#)
 - [setting up a safe site](#)
- a study, which analyses the impact of the Covid-19 pandemic on Egypt, Kazakhstan, Poland, Turkey and Ukraine
- a guidance note on Gender-Based Violence and Harassment (GBVH), which aims to help companies and investors identify and address GBVH risks in their projects and operations. Three short sector briefs provide further details about sector-specific risks and benefits as well as practical examples of what companies and investors can do to prevent GBVH.

Stakeholder engagement

Relations with civil society

The Bank maintained its regular strategic dialogue with representatives of civil society throughout the reporting period: the EBRD Civil Society Engagement (CSE) team organised 19 country, sector and thematic consultations, 10 Presidential CSO meetings, six engagements between Board officials and those in the economies where the EBRD invests (including three Board Connect visits – Board Consultation Visits held in virtual format) and 20 external activities with CSOs and partners.

In 2021 the Civil Society Capacity Enhancement Framework (CSCEF), through which the Bank seeks to establish partnerships and provide support to a wide range of civil society actors, undertook 14 technical cooperation projects totalling around €4.5 million, and which supported the CSCEF's four main areas of focus: sustainable energy and resources, economic inclusion, good governance and digital transformation.

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 responding to the Covid-19 crisis, and the social and economic effects of the pandemic hit them hard. In 2021 the CSE team piloted the first project under the Digital Transformation of Civil Society Programme in Turkey, helping participating CSOs to increase their digital resilience and start their digital transformation journeys. The project assessed the digital needs of selected CSOs, provided them with core funding, and matched each with an experienced digital mentor. With this project the Bank targeted the enhancement of digital skills at the institutional level and delivered training tailored to the needs of the CSOs. During this project participating CSOs also had the opportunity to network and exchange knowledge and experience about digital transformation. The aim is to expand this programme to other countries in 2022.

The EBRD has continued to focus on forming successful partnerships with CSOs in order to foster new opportunities and support effective project implementation, thereby enabling the Bank to multiply its impact in supporting CSOs in the EBRD's regions. For instance, in 2021 the Bank renewed its partnership agreement with the United Nations Office on Drugs and Crime (UNODC). The EBRD and UNODC then partnered on a project to promote more transparent and accountable governance systems by establishing a national-level dialogue platform to coordinate and foster public-private partnerships on anti-corruption. This project targets all five Central Asian countries (Kazakhstan, the Kyrgyz Republic, Tajikistan, Turkmenistan and Uzbekistan), with an initial pilot initiative in Uzbekistan to support implementation of the 2018 Law on Public Control and to promote external and independent oversight with a view to setting a benchmark for the region.

Within the broader EBRD Annual Meeting programme, the CSE team delivered a virtual Civil Society Programme on 28-29 June 2021. This consisted of two sessions between civil society representatives and the Board of Directors and the EBRD President, an open panel focusing on private-sector partnerships, and a special session on the first year of implementing the Bank's Project Accountability Policy (IPAM). A record number of almost 200 CSOs from 44 countries participated in the virtual event.

As in previous years, approximately 2,500 CSO contacts received regular updates about the EBRD's latest developments through the EBRD's CSO newsletter and database. These contacts were notified of upcoming consultations on EBRD policies and country and sector strategies through dedicated webpages for civil society, the EBRD CSO newsletter, targeted email notifications and alerts, and the use of social media platforms such as Facebook, Twitter and LinkedIn.

In recognition of the ongoing Covid-19 pandemic, CSO consultations, presidential visits and Board consultation visits were largely delivered in a virtual format. Subject to applicable national and local Covid-19 restrictions and regulations, some meetings with CSOs took place in person.

The EBRD website

In 2021 the EBRD's main corporate communications platform – its website, ebrd.com – registered an 18 per cent drop in users. Meanwhile, the Communications Department continued its campaign to optimise the team's email delivery system, supplied by GovDelivery.

Table 4. Metrics on use of the Bank’s website

	Web traffic	User sessions	Page views	Subscribers	Email subscriptions ¹¹
2020	1,726,829	3,002,737	6,543,441	119,407	2,321,722
2021	1,436,326	2,459,622	5,310,078	99,345	1,921,855
Difference	-18.3% ¹²	-19.82%	-20.7%	-16.80%	-17.22%

The decrease in GovDelivery subscribers and subscriptions can be explained by an audit and clean-up of the subscriber base which involved the removal of ghost subscribers generated by automatic bots. At the end of the reporting period the Bank launched new templates for the email bulletins which, it is hoped, will encourage greater interaction and higher click-through rates.

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 14 per cent to 295,959 during the year. EBRD content attracted 1,600,365 engagements across all platforms, including a 16.2 per cent increase of the Bank’s LinkedIn follower base (an additional 23,195 users).

It was an extremely busy year for campaigns in 2021. The team undertook four major campaigns: EBRD30, COP26, the Annual Meeting and the Green Innovation Campaign, and dozens of smaller ones, such as the Literature Prize, International Women’s Day and EBRD Green Cities.

Accountability and governance information

Compliance information

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 124 entities and 34 individuals during the reporting period, in line with its obligation to recognise and enforce debarment notices from other parties to that agreement.

Debarment notices – Following proceedings instituted under the Bank’s Enforcement Policy and Procedures, the Bank issued debarment notices against one individual and three entities during 2021.¹³

Anti-corruption reports – During 2021 the EBRD Office of the Chief Compliance Officer issued its annual Integrity and Anti-Corruption Report on matters arising during the 2020 calendar year, which was published and posted on the Bank’s website.

Independent Project Accountability Mechanism

During 2021 the Bank’s Independent Project Accountability Mechanism (IPAM) continued the management of 12 cases carried over from 2020, and registered three requests, creating a total of 15 active cases to be processed. Nine requests received through the year did not meet the criteria for registration. During the reporting period, IPAM also closed two cases.

By the end of the year, the active case portfolio carried over into 2022 included 13 active cases. All of these cases are being managed under the 2019 Project Accountability Policy, with the exception of one case undergoing compliance review, which remains under the 2014 Rules of Procedure.

During 2021, IPAM published its 2020 Annual Accountability Report and the Outreach Strategy 2021-2024.

¹¹ Note that subscribers can sign up to multiple streams of content, by location and sector.

¹² The downturn in traffic to ebrd.com, the first year-on-year drop on record, was the result of fewer one-off peaks driven by search traffic and the fact that fewer PSDs and Procurement Notices were published on the website.

¹³ The Bank’s Enforcement Policy and Procedures were most recently amended with effect from 4 October 2017.

IPAM's public Virtual Case Registry includes all individual case summaries that provide information about all active requests. The new Case Registry also contains a case tracker, with all IPAM case documents disclosed by stage of processing.

As of 31 December 2021, a total of 22 reports were disclosed in the IPAM Case Registry.

Table 5. Reports disclosed by IPAM during 2021

Case number	Case name	Documents disclosed
2021/03	Maritsa Mine East (Grant N. 54)	Request (Eng)(Bul) Assessment Report (Eng)(Bul)
2021/02	Gradacac Water Supply Project (45810)	Request
2021/01	Belgrade Solid Waste PPP (Request #2) (46758)	Request Assessment Report (Eng)(Ser)
2020/07	Tumad Gold Mines Development (49041)	Assessment Report (Eng)(Tur)
2020/06	Corridor VC in FBH - Part 3 (49058)	Assessment Report (Eng)(Bos) Compliance Assessment (Eng)(Bos) Management Response
2020/03	Saint Gobain Construction Products Russia (42659)	Compliance Assessment (Eng)(Rus)
2020/02	Lydian (Amulsar Gold Mine) - Extension (48579)	--
2020/01	Kvesheti Kobi Road Project (50271)	Compliance Assessment (Geo) Requesters' response to IPAM visit
2019/01	Shuakhevi HPP (Request #2) (45335)*	--
2018/09	MHP Corporate Support Loan and MHP Biogas (47806.49301)	Problem Solving Summary (Eng)(Ukr) MHP Joint Statement (Eng)(Ukr)
2018/08	Nenskra HPP (46778)	Monitoring Report I (Eng)(Geo) Monitoring Report II (Eng)(Geo)
2018/01	Kozloduy International Decommissioning Support Fund*	--
2017/10	CMI Offshore Regional (47096)	Monitoring Report II Monitoring Report III
2017/07	Lukhoil Shah Deniz Stage II (46766)	Monitoring Report II Monitoring Report III
2017/05	South East Europe Equity Fund (34894)	Monitoring Report III Monitoring Report IV

* 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

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 2021

Document type	Examples disclosed during the Reporting Period
EvD annual reporting	Evaluation Work Programme and Budget 2022 Annual Evaluation Review 2020
Special and thematic studies and approach papers	Cluster Evaluation – Evaluation of Hydrocarbon Projects EBRD'S Nominee Director Programme EBRD Trade Facilitation Programme EBRD's Health-Focused Interventions Learning and Knowledge Management at the EBRD Solar Power Projects Approach Paper Solar Power Projects Information Sheet Sustainable Infrastructure in Advance Transition Countries Approach Paper Evaluation of EBRD's Operations in West Gaza Approach Paper
Operational knowledge products	EvD Introductory Video (at the bottom of the page) Connecting the Dots: Evidence that Drives Change (new series of knowledge notes) Climate Finance Gender Mainstreaming

Other disclosures

During the reporting period, the EBRD prepared and disclosed a series of its regular targeted reports, including the following:

- a. [Annual Review 2020](#)
- b. [Financial Report 2020](#)
- c. [Sustainability Report 2020](#)
- d. [Sustainability Reporting Disclosures for 2020 in Accordance with the GRI Standards](#)
- e. [Transition Report 2021-22 – System Upgrade: Delivering the Digital Dividend](#)
- f. [Annual Procurement Review 2020](#)
- g. [Annual Corporate Procurement Review 2020](#)
- h. [Task Force on Climate-Related Financial Disclosures Report 2020](#)
- i. [Public Information Policy Implementation Report 2020.](#)

The Bank's Environmental and Social Advisory Council held a meeting on 31 March 2021, the minutes of which have been disclosed on the EBRD's [website](#).

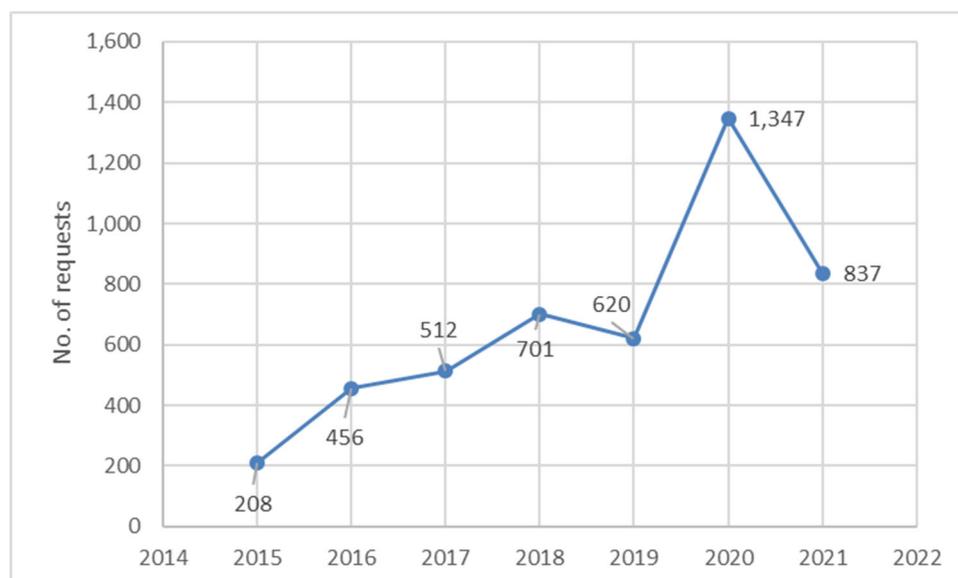
Requests for information

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.

In recent years the EBRD has seen an 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. This trend was particularly apparent during 2020, when queries which might otherwise have been raised in person, or during EBRD events, were registered online. This peak in activity was not replicated in 2021, due in part to delivery of events in hybrid format, improvement of the Bank's website search function, and a reduction in queries relating to the Bank's Covid-19 response.

During the reporting period, the Bank received 837 requests¹⁴ 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 below.

Chart 4. Trends in requests for information



¹⁴ This figure does not reflect all requests relating to procurement received during the reporting period, as staffing and technical challenges prevented consistent collection of statistics.

Chart 5. Requests for information, by area of interest

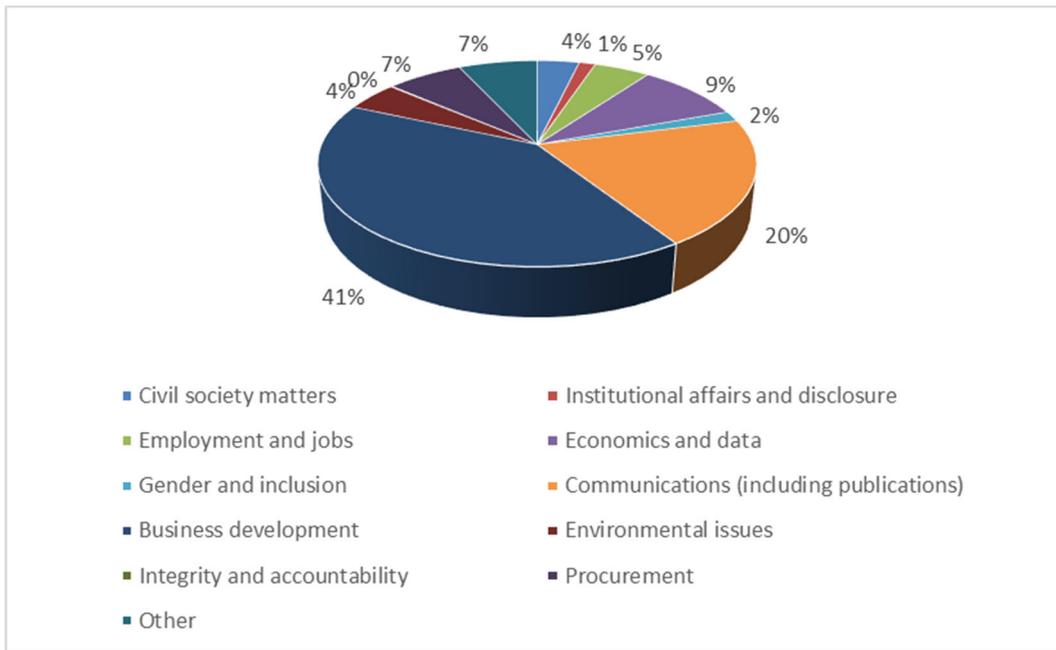
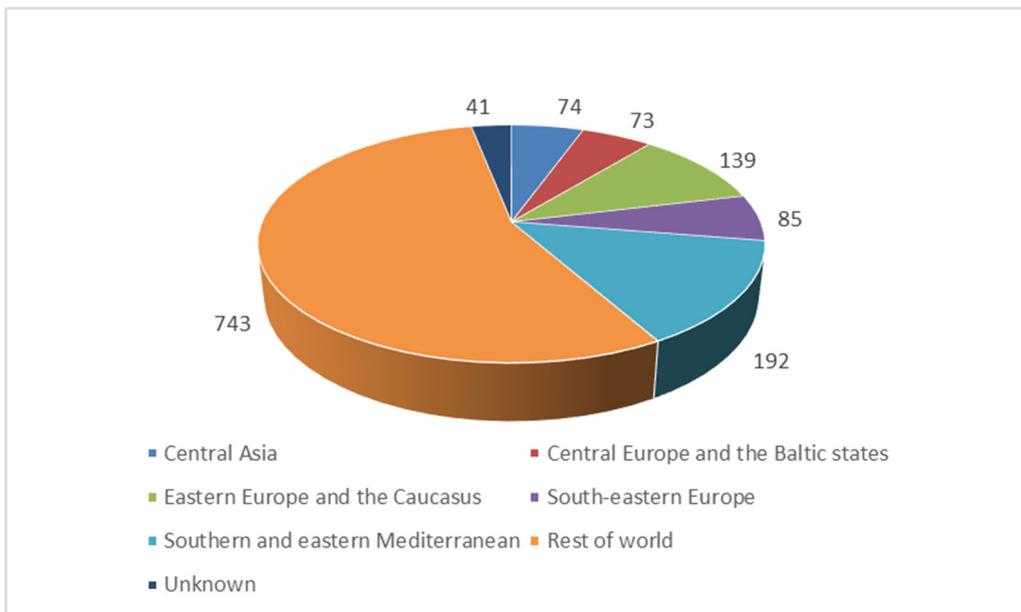


Chart 6. Requests for information, by requester location



Moving forward

During 2022 the EBRD will continue its work to mainstream and upskill all staff on issues of transparency and disclosure. It will conduct additional awareness-raising activities with staff in operational departments, review the internal processes implemented to ensure compliance with all routine disclosure requirements, and explore additional initiatives to strengthen staff knowledge and capacity on issues of transparency and disclosure. Further, the Bank will continue to work with stakeholders, including PWYF, on continuous improvement of its disclosure practices, including as contemplated by the PWYF DFI Transparency Tool currently under development.

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
PCM	Project Complaint Mechanism
PSD	Project Summary Document
PWYF	Publish What You Fund

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