HOW TO COMPLAIN ABOUT A PROJECT FUNDED BY THE EUROPEAN BANK FOR RECONSTRUCTION AND DEVELOPMENT?

A Guide to the Independent Project Accountability Mechanism (IPAM)

If the European Bank for Reconstruction and Development (EBRD) funded or supported the project that is causing you harm, you may be able to file a complaint with their accountability mechanism, the Independent Project Accountability Mechanism (IPAM).

Understanding the EBRD and IPAM

WHAT IS THE EBRD?

The European Bank for Reconstruction and Development (**EBRD**), established in 1991, is a multilateral development bank headquartered in London, United Kingdom, that provides financing to both the public and private sector, in central Europe, central Asia and the southern and eastern Mediterranean. The EBRD invests primarily in private sector banks, industries and businesses, often with public partnerships.

WHAT IS IPAM?

EBRD has an independent accountability mechanism: the Independent Project Accountability Mechanism (**IPAM**). Previously, this mechanism was known as the Project Complaints Mechanism (PCM), and prior to that, the Independent Resource Mechanism (IRM).

IPAM was established in 2019, and receives complaints related to the environmental and social impacts of EBRD-supported projects. **If you are affected by an EBRD-supported project, you can file a complaint with IPAM.**

To file a complaint, you need to provide specific information about the issue you are experiencing, as outlined in the "How to file a complaint" section.

If your complaint is found to be eligible, IPAM has two functions to try to resolve the complaint: **dispute resolution (also known as problem solving)** or **compliance review**. You can decide which process you would like your complaint to enter if found eligible. If you want to try both problem-solving and compliance review, you must typically use problem-solving first. The two functions cannot be done simultaneously. You can learn more about the difference between dispute resolution and compliance review, and which option is better for your complaint on the homepage of this guide.

DISPUTE RESOLUTION

At IPAM, the voluntary dispute resolution process is called "**problem-solving**". During the problem-solving phase, the IPAM team will facilitate dialogue and negotiations between the affected communities and the EBRD's client with the goal of reaching a mutually agreeable solution. You can learn more about this phase below.

COMPLIANCE REVIEW

At IPAM, the fact-finding investigation process is called "**compliance review**". During the compliance review phase, IPAM investigates whether the EBRD has complied with its environmental and social policy or access to information policy, and whether any non-compliance has caused harm to the community. IPAM then prepares a compliance report that includes its findings and recommendations for the EBRD. You can learn more about this phase below.

How to file a complaint

CAN YOU COMPLAIN TO IPAM?

Before filing a complaint, ask yourself the following questions. If your answer is **yes** to all of the questions, then you can complain to IPAM.

Project: Is the project supported by the EBRD?

> IPAM accepts complaints about all EBRD projects submitted within 24 months of the date that EBRD stops having a financial interest in the project (e.g. through full repayment, prepayment, disposal or otherwise).
>
> If the project has not yet been approved, then the complaint will not be eligible for an IPAM process. However, bank management will take the request into account during project preparation.
>
> You may be able to find information about project completion on the relevant project page on the EBRD website, via an information request, or by contacting IPAM directly to ask for help.

Impact: Is the project causing harm (or is it anticipated to cause harm) to any individual or group in the community? Complaints by organizations that are not directly affected can also accepted & considered

> IPAM can also accept and consider complaints filed by organizations that are not directly affected by a project depending on the circumstances.
>
> **Important:** Your complaint cannot be anonymous, but you can request confidentiality regarding your identity or other information you submit to IPAM. If you are facing reprisals or fear retaliation be sure to tell IPAM to discuss how you can move forward to address the risk of reprisals.
>
> Duly appointed representatives can represent affected communities.

> If you are an organization that is not directly affected, provide proof of efforts to engage with project-affected people and any feedback, and the reasons preventing any project-affected people from submitting a complaint themselves.

Harm: Is the harm (or anticipated harm) related to environmental and social impacts caused by the project?

> Any material negative environmental and social effect on people or the environment resulting directly or indirectly from an EBRD supported project or sub-project. Harm may be actual or reasonably likely to occur in the future.

Attempted resolution: Did you contact the EBRD and/or client to address the issues?

> If you don't fear retaliation, you are required to contact the EBRD or the company to let them know about the problem and give them an opportunity to address it **before** contacting IPAM. When filing a complaint, submit a description of any good faith communication you had with bank or company staff. Keep copies of all communications (even if they are unanswered), and notes from all meetings to submit with your description.
>
> **Important:** If you are facing reprisals or fear retaliation, you can skip this step and go directly to IPAM. Tell them why you did not contact the bank and/or company, if you would like them to keep your identity confidential, and discuss how you can move forward to address the risk of reprisals.

MODEL COMPLAINT LETTER

We have developed a model complaint letter tailored for IPAM. This template provides a practical starting point for your complaint, designed to help you effectively convey your concerns. Once submitted, IPAM will acknowledge receipt of your complaint.
Download complaint letter

COMPLAINT FILING CHECKLIST

Download checklist

- [ ] **Format:** Submit your complaint in writing. There is no specific format required.
- [ ] **Complainant details:** Include the name of each person or organization filing the complaint, and contact details for key community representatives. If you have a representative, include signed written authorization giving them authority to represent you. Also, state whether you want your representative to be the main contact with IPAM, and if so, provide their contact details.
- [ ] **Confidentiality:** If you need confidentiality due to fear of reprisals or for other reasons, let IPAM know, and explain why. Clearly describe the reasons for your request.
- [ ] **Project details:** Provide a description and location of the project. Include any details you know (e.g. sector, company name, or project number). You can find information about projects on the EBRD project finder, via an information request, or through the DeBIT tool or Early Warning System (databases you can search).
- [ ] **Description of harm:** Describe the harm you are experiencing or believe you may suffer in the future because of the project. Include a detailed description of the relevant facts.

- [ ] **Evidence of attempted resolution:** Explain the steps you have taken to contact the EBRD, the government, or the company to try to resolve the issue. Include a detailed description of your efforts and any replies you received. If you have communications between you and these actors (even if unanswered), include them. If you did not try to contact the EBRD, the government, or the company (for example, because of fear of retaliation), explain why.
- [ ] **Optional:**

  Including the following can strengthen your complaint:

  - Specify which EBRD policies, guidelines, or procedures you believe were not followed (if known).
  - State your preferred outcomes or remedy.
  - Indicate whether you prefer the problem-solving option, the compliance review option, or both.
  - Provide any other relevant information, documents, or materials (for example, communications, written or oral statements, media reports, maps, photographs, audiovisual materials).
  - Specify your preferred method of communication with IPAM (for example, email, posted mail, WhatsApp).
  - Describe any concerns you have about risks of retaliation.

STRENGTHEN YOUR COMPLAINT BY REFERENCING EBRD POLICIES

When filing your complaint to IPAM, you may want to reference bank policies that were violated. Environmental and social safeguard policies play an important role in your complaint. These safeguards are rules and policies designed to identify and mitigate risks associated with bank activities, with an overarching goal of preventing environmental and social harms. Understanding these safeguards is essential for anyone seeking to hold banks accountable for harms associated with their investments.

IPAM receives complaints related to all environmental and social aspects of EBRD operations, ensuring the EBRD has complied with its Environmental and Social Policy (2019 or 2024 version, as explained below), or the project-specific provisions of its Access to Information Policy, which can be found below.

Including this information is **optional**, but can strengthen your complaint by identifying clear grounds for EBRD's accountability.

EBRD POLICIES

2024 Environmental and Social Policy
Effective 1 January 2025 for projects receiving initial approval from EBRD Management after that date

> The EBRD's updated 2024 Environmental and Social Policy is available here. Summary coming soon

EBRD's 2019 Environmental and Social Policy
Effective 1 January 2020 for projects that received initial approval by EBRD Management from that date until 1 January 2025

The EBRD requires its projects to comply with the following requirements:

Performance Requirement 1: Assessment and Management of Environmental and Social Risks and Impacts

This requirement calls on the EBRD's client (the borrower) to identify, assess and manage environmental and social risks associated with a project. It establishes a mitigation hierarchy approach, instructing borrowers to anticipate, avoid, minimize and mitigate risks and impacts to acceptable levels, and compensate for and/or offset residual adverse impacts if necessary.

Performance Requirement 2: Labour and Working Conditions

This requirement protects workers rights in all projects, emphasizing health and safety at work. It mandates fair treatment, non-discrimination, and equal opportunities, ensuring compliance with national labor laws and collective agreements. Clients must protect vulnerable workers and prevent forced or child labor. An effective grievance mechanism must be available for all workers, including those employed by third parties and in the supply chain.

Performance Requirement 3: Resource Efficiency and Pollution Prevention and Control

This requirement sets standards for resource efficiency and pollution prevention, emphasizing the adoption of a mitigation hierarchy to address adverse impacts on human health and the environment. Clients must avoid, minimize and manage greenhouse gas emissions, hazardous substances, and materials, including pesticides. They should identify opportunities for resource efficiency improvements throughout the project lifecycle.

Performance Requirement 4: Health, Safety and Security

This requirement focuses on protecting the health, safety and security of both workers and project-affected communities. It mandates ensuring safe, healthy and secure working conditions and implementing a risk-appropriate management system. Clients must identify, assess, and manage health, safety and security risks to communities and consumers throughout the project lifecycle.

Performance Requirement 5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement

This requirement aims to avoid involuntary resettlement or minimize it when unavoidable by exploring project alternatives. It emphasizes avoiding forced eviction, mitigating adverse social and economic impacts by providing timely compensation for lost assets, and ensuring meaningful consultation and participation. The objective is to restore or improve the livelihoods and living standards of affected people and provide adequate housing with security of tenure for physically displaced individuals.

Performance Requirement 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

This requirement focuses on protecting and conserving biodiversity using a precautionary approach. It mandates adopting the mitigation hierarchy in project design and implementation to achieve no net loss, and where appropriate, a net gain of biodiversity. It also aims to maintain ecosystem services and promote good international practices in the sustainable management and use of living natural resources.

Performance Requirement 7: Indigenous Peoples

This requirement ensures projects respect the dignity, rights, cultures and livelihoods of indigenous peoples. It aims to anticipate and avoid adverse impacts on indigenous communities or minimize and mitigate them when avoidance is not feasible. This requirement ensures effective participation and mandates ongoing relationships and good-faith negotiations with indigenous people, obtaining their free, prior and informed consent (FPIC) where applicable.

Performance Requirement 8: Cultural Heritage

This requirement supports the protection and conservation of cultural heritage. It adopts the mitigation hierarchy approach to protect cultural heritage from adverse project impacts and promotes the equitable sharing of benefits derived from its use.

Performance Requirement 9: Financial Intermediaries

This requirement outlines how financial intermediaries (who then on-lend funds) will assess and manage environmental and social risks associated with the sub-projects they finance. It promotes good environmental and social management practices in these sub-projects and advocates for sound human resources management within the financial intermediaries themselves.

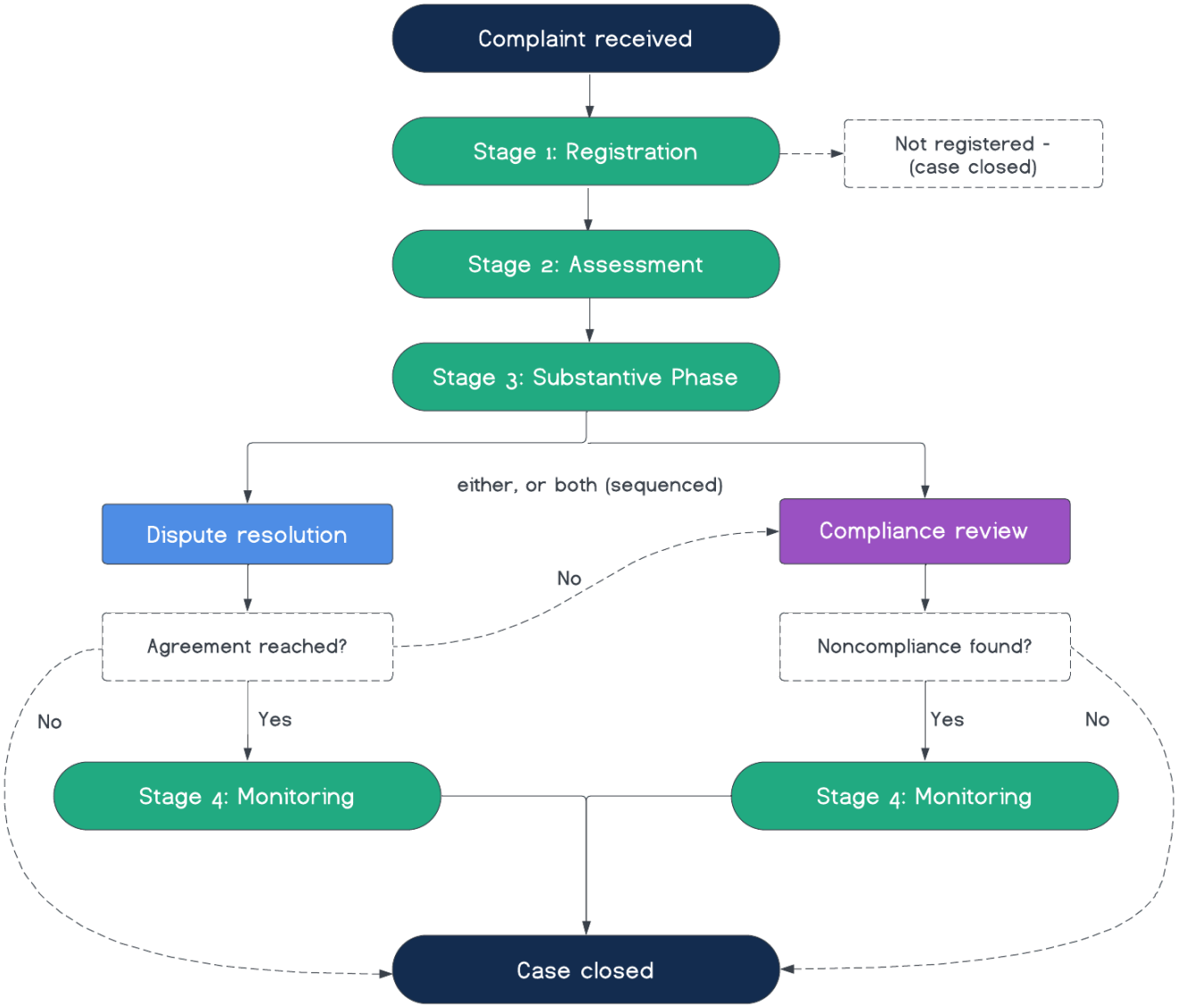
Performance Requirement 10: Stakeholder Engagement

This requirement establishes a systematic approach to stakeholder engagement, ensuring that clients build and maintain constructive relationships with their stakeholders, including local communities and those affected by the project. It emphasizes the importance of effective and inclusive engagement throughout the project cycle, ensuring that appropriate environmental and social information is disclosed and that meaningful consultations are held. Clients are expected to consider feedback from these consultations and integrate it into project decision-making where appropriate. Additionally, this requirement mandates that grievances from stakeholders are responded to and managed in a timely and appropriate manner.

EBRD's 2024 Access to Information Policy
Effective 1 January 2025

The EBRD has implemented a policy to ensure transparency and maximize access to information regarding its operations (with limited exceptions), and clear procedures for processing requests and reviewing decisions.

What happens after you file a complaint?



Stage 1: Registration

After filing your complaint (known as a **Request**), IPAM will decide whether the complaint is eligible for registration.

Your complaint will be registered if IPAM finds that it meets the outlined requirements in the “File a Complaint” section above, including the following eligibility criteria, and raises issues which relate to specific obligations of EBRD under its policies:

1. **Project:** Is the project supported by the EBRD?
2. **Impact:** Is the project causing harm (or is it anticipated to cause harm) to any individual or group in the community?
3. **Harm:** Is the harm (or anticipated harm) related to environmental and social impacts caused by the project?

4. **Attempted resolution:** If the complainants have **no** fear of reprisals or retaliation, did you contact the EBRD and/or client to address the issue?

Registered complaints are published on the IPAM Case Registry.

A complaint will not be registered if it is submitted more than 24 months after EBRD ceases to have a financial interest in the project (as a result of full repayment, prepayment, disposal or otherwise). A complaint will also not be registered if it duplicates a case without new evidence is fraudulent or frivolous, or concerns a project that has not yet been approved by the EBRD Board. Complaints relating to procurement, fraud and corruption will be redirected elsewhere at the EBRD.

If a complaint is not registered, IPAM will notify you and allow you a reasonable opportunity to correct the issue and re-submit your complaint.

Stage 2: Assessment

If your complaint is registered, IPAM will start an Assessment process to clarify the issues raised, discuss the scope and outcomes of the dispute resolution and compliance functions with the parties, and assess parties' willingness to engage in these functions.

IPAM will engage with all the parties to gather information, and will visit the project area during this stage, unless deemed unnecessary.

IPAM will make a final decision in an Assessment Report, outlining whether the complaint will proceed to dispute resolution (with agreement from the parties), be transferred to compliance review (if dispute resolution is not agreed upon, and the complainants expressly request it), or be closed.

Stage 3: Substantive Phase

All complaints that have been assessed and not closed should then enter a substantive phase. As mentioned, at IPAM you have the option to choose either "dispute resolution" or "compliance review" as the next step, or do both (with dispute resolution coming first).

DISPUTE RESOLUTION

As mentioned above, dispute resolution is a voluntary process where IPAM acts as the facilitator between the community and IPAM's client. This process can involve dialogue, joint fact-finding, mediation, negotiation, and facilitation, and this process can and should be designed and implemented together. The aim of a dispute resolution is to reach an agreement between all the parties, and find a mutually agreeable solution to your concerns. The dispute resolution process at IPAM is called "**problem solving**".

Since dispute resolution is voluntary, any party can choose not to participate. If at any stage of this process a party no longer wants to continue with dispute resolution, the case is transferred to compliance.

If parties agree to participate, communities can share their concerns about the project directly with IPAM's client, and advocate for specific solutions to their concerns. If the parties agree on solutions, IPAM will help them to formalize those solutions in a signed agreement and will monitor its implementation.

If no agreement is reached or if early termination occurs, IPAM will close the case. If you request for IPAM to transfer the case to a compliance assessment, it can do that.

If you would like to know more about what a dispute resolution process involves, see the IPAM Project Accountability Policy.

COMPLIANCE REVIEW

The compliance phase consists of two steps:

Step 1: **Compliance assessment:**

IPAM conducts an assessment to decide if the complaint is eligible for a compliance review. At this stage, IPAM's focus is on whether there is clear evidence of environmental and/or social harm and if such harm can be linked to the bank's failure in following its own policies. This stage is not a full investigation, but rather a preliminary assessment of whether there is enough evidence to justify further investigation.

IPAM will then release a compliance assessment report, recommending a compliance review or the closure of the case.

Step 2: **Compliance Review:**

As mentioned above, this is the compliance review phase, which is a fact-finding process where IPAM investigates whether the EBRD has complied with its environmental and social policies, and whether such non-compliance has caused harm to the community.

After investigating, IPAM prepares a compliance report with its findings and recommendations. If the EBRD is found to be in compliance, IPAM will close the investigation. If the EBRD is found to be non-compliant, IPAM may recommend remedial changes to bank practices, procedures or systems, or identify project-specific actions to bring the EBRD into compliance and address the harm.

EBRD Management then has a specified period to respond to the report and indicate the actions they will take to address the concerns raised.

If you would like to know more about what a compliance process involves, see the IPAM Project Accountability Policy.

Stage 4: Monitoring

If your complaint goes through a dispute resolution process and results in an agreement, or goes through a compliance review and a compliance report is published showing non-compliance, then the complaint will enter a monitoring phase.

DISPUTE RESOLUTION

If an agreement is reached, IPAM will help the parties by monitoring the implementation of the agreement. Monitoring can be achieved by setting a program, timelines and outcome indicators within the agreement. IPAM will monitor whether the agreement was implemented and publicly disclose the outcomes on IPAM's registry. Cases are closed once IPAM determines that the commitments made by parties in the agreement are being effectively carried out, and implementation timetables are being met.

COMPLIANCE REVIEW

If the EBRD is found to be non-compliant in the compliance review, IPAM will send the compliance report to bank management, to prepare a management action plan. IPAM can revise its recommendations in its compliance report, taking into account the management action plan and management response.

IPAM will then monitor the situation until the management action plan is fully implemented, meaning the implementation plans and commitments are being effectively carried out, and implementation timetables are being met. The monitoring reports will be submitted to the Board of Directors. The final monitoring report will conclude the compliance review process. IPAM will then close the complaint.

Real stories from communities who have filed complaints



MHP Corporate Support Loan/ MHP Biogas, Ukraine

DISPUTE RESOLUTION COMPLIANCE REVIEW

Assessing IPAM’s performance

COMPARISON TO BEST PRACTICE

✓

Independence: IPAM’s reporting line is independent from bank management; it reports to the Board of Directors.

✓

Transparency: IPAM makes complaints, eligibility reports, final compliance reports, dispute resolution reports, and follow-up monitoring reports public.

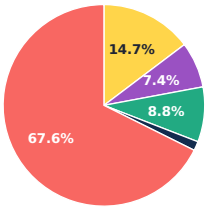
✓

Remedy: IPAM can make recommendations for remedial measures to address areas of non-compliance, and explicitly has a mandate to recommend remedy for communities.

A LOOK AT THE DATA

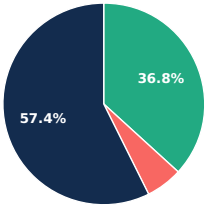
We have brought together some charts, based on the latest data available in the Complaint Dashboard, to offer a deep dive into the EBRD and IPAM’s performance.

Complaint Outcomes



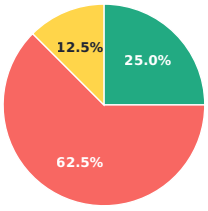
Active	10	14.7%
Monitoring	5	7.4%
Closed With Outputs	6	8.8%
Closed With Outputs Outside Process	1	1.5%
Closed Without Outputs	46	67.6%

Eligibility



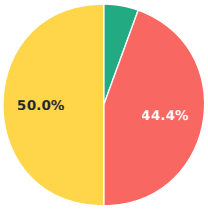
Eligible	25	36.8%
Ineligible	4	5.9%
In Progress	0	0.0%
Not Undertaken	39	57.4%

Dispute Resolution Outcomes (when undertaken)



Successful	2	25.0%
Unsuccessful	5	62.5%
In Progress	1	12.5%

Compliance Review Findings (when undertaken)

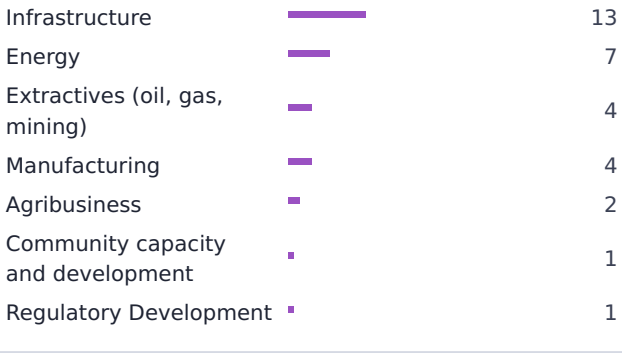


Compliant	1	5.6%
Non-Compliant	8	44.4%
In Progress	9	50.0%
No Output	0	0.0%

Complaint issues



Complaint sectors



Figures are numbers of complaints recorded in the Accountability Console for this mechanism, as of the download date.

RECOMMENDATIONS TO IMPROVE IPAM

IPAM should be given authority to self-initiate compliance reviews without having to receive a complaint. This would increase IPAM's effectiveness in contexts where reprisals and restrictions on civic space make it too dangerous for project-affected communities to file complaints. (GPP 47)

Requesters should not be required to raise their complaint to EBRD management or the client before approaching IPAM. While it's good that IPAM waives this requirement in cases where it would be dangerous to do so, it would be better just to make it optional. (GPP 32)

During dispute resolution (also called "problem solving"), IPAM and/or mediators should be required to recognize power imbalances between the parties, and take steps to support the parties equitably. (GPP 62)

Contact IPAM

Independent Project Accountability Mechanism (IPAM): https://www.ebrd.com/ipam

To send complaints:

ipam@ebrd.com
Online complaint form:

https://www.ebrd.com/eform/IPAM/Request_form?language=en
Attn: Victoria Marquez-Mees, Chief Accountability Officer
Independent Project Accountability Mechanism,
European Bank for Reconstruction and Development
Five Bank Street, London, E14 4BG, UK

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