

EBRD Project Public Consultation

This paper provides basic information for NGO activists and citizens who are affected by EBRD projects and policies. It outlines how you can best participate in EBRD public consultation and achieve desirable outcomes given the EBRD public consultation procedures, internal regulations, international treaties and internationally accepted standards. If you are interested in influencing EBRD decisions about projects or policies, it is highly recommended that you obtain a copy of the EBRD Environmental Procedures and EBRD Public Information Policy. These will give more detail and help in discussions with project sponsors or EBRD staff. Both the Environmental Procedures and the Public Information Policy are available in EBRD Resident Offices in each country that the EBRD

Consultation with the public

“The EBRD believes that effective public consultation is a way of improving the quality of operations. The Bank’s purpose is “to foster the transition towards open market-oriented economies and to promote private and entrepreneurial initiative in the central and eastern European countries committed to and applying the principles of multiparty democracy, pluralism and market economic.” This means that, at a minimum, Project Sponsors must ensure that all national requirements for public consultation in the country where the operation will take place are met. In addition, Sponsors will have to follow the procedures described in the Bank’s Public Disclosure of Information Policy [now replaced with the Public Information Policy] and Annex 1 of these procedures. In addition to the involvement of government agencies and elected officials, those potentially affected by a significant new, extended or transformed operation, which has been classified as “A” level, should be consulted so that they have the opportunity to express their concerns and views before a financing decision is made.”

EBRD Environmental Procedures (1996), section 5.4, page 12.

operates in, or on the Internet (Environmental procedures at www.ebrd.com/english/about/policies/enviro/main.htm, Information Policy at www.ebrd.com/english/about/policies/pip/pip.pdf). Both of these documents should be available in English and Russian.

BASIC PRINCIPLES AND PROCESS FOR PUBLIC PARTICIPATION

The EBRD Environmental Procedures are based on two basic principles for public consultation. They are that project sponsors (the company, government or institution responsible for preparation and implementation of a project) must:

- ensure that all national requirements for public consultation are met; and
- meet the specific EBRD requirements for public consultation (based on Annex 1 to Environmental Procedures and the Public Information Policy).

There are several important stages in the preparation of a project that you should be aware of. These are:

- Categorisation of the project

Even though this is not a part of the consultation process, project categorisation impacts the amount of information that will be made available to the public and the level of participation. The Environmental Appraisal Unit of the EBRD makes the decision based on the expected impacts of the project and the proposed use of the EBRD finances (projects with potentially significant impacts are categorised as “A”)

- Notification of the project

This is only required by EBRD for category “A” projects. The project sponsor is required to notify affected public and interested NGOs about the preparation of a project before the public consultation commences.

- **Scoping process**

This is only required by EBRD for category “A” projects. Scoping is an identification of key issues to be addressed by an Environmental Impact Assessment (EIA) and possibilities for public involvement. This usually takes the form a public meeting. See the ‘Scoping Process’ section below for more details.

• **Environmental Impact Assessment, Environmental Analyses**

For Category “A” projects - the project sponsor must prepare EIA documentation and make it publicly available (60 days for privately sponsored projects, 120 days for public sector projects) to allow for public comment prior to a financing decision being made by the EBRD Board of Directors. The public consultation requirements of the country where the project is located must also be followed.

For Category “B” projects – a summary and Environmental Analysis should be released by the EBRD in the Project Summary Document (prior to the Board decision). Project requirements are set on a case-by-case basis, and at a minimum, the country’s public consultation requirements must be followed.

- **Public Hearings**

There is no specific requirement for Public Hearings in the EBRD Procedures, but they are a common mechanism for public consultation. These meetings provide affected people with an opportunity to express their opinion about the project.

• **Board Approval**

A summary report on the public consultation is included in the documentation provided to the Board of Directors together for Board approval.

CATEGORISATION OF THE PROJECT

Prior to the Initial Review (when the project is officially presented to the bank management for a decision on whether it can be included in the project pipeline) the Environmental Unit prepares a so-called “Environmental Screening Memorandum.” This document details what category the Environmental Unit has classified a project in, and why. The screening memorandum

also provides for a description of required public consultation. Categorisation of a project is a crucial decision that determines the at what level the public will be consulted and the amount of information that will be made available. It should be noted that the requirements and even categories of a project can be changed if issues that were not known at time of screening are found.

Categories of Projects

There are three basic environmental categories of project. Details of project characteristics for each category can be found in Annex 4 to the Environmental Procedures. The category of project is included in the Project Summary Document which should be available on the EBRD website or in the Resident Office of the country where the project is located no later than 30 days before the Board of Directors meeting on the project.

Category “A” operations – An environmental impact assessment must be publicly released and a public consultation process undertaken prior to Board consideration of the project. The EBRD has a list of projects that are in this category. It applies to “greenfield” or major extension, transformation or conversion operations

Category “B” operations - an environmental analysis must be prepared. This category includes all “greenfield” or major extension and transformation projects not included in category “A”. For public sector projects an environmental analysis should be attached to the Project Summary Document and should be available through the EBRD’s Publications Desk and the web site. For private sector projects, a summary of key findings of the Environmental Analysis should be available together with the Project Summary Document 30 days before consideration by the Board of Directors.

Category “C” operations – Includes all other projects. There are no special requirements, but the EBRD can make special requirements on individual projects for public consultation.

Additionally, for any project, an environmental audit could be required (if it is needed, the project will be classified as category “1”; if not, then category “0”). The Environmental Audit is usually

conducted by a consulting firm, and identifies past or present concerns and potential environmental, health and safety risks associated with the proposed operation. It may also help to establish the baseline conditions for agreeing on responsibility for environmental damage. It also includes questions about public information and relations with local communities. An environmental audit is not a publicly available document.

Problems of incorrect categorisation of projects

As mentioned above, the categorisation of projects is crucial to the public consultation process and access to information. It is essential when NGOs learn about a project to inform the EBRD about the expected impacts as soon as possible, i.e. before the decision about the category is made. However, this can be difficult as often there is no opportunity to learn about the project early enough.

Incorrect categorisation does not happen often but there is evidence of such cases in the EBRD. In the past there were cases, where NGOs felt the categorisation was not appropriate for the potential environmental and social consequences that could result from the project. One of the ways used to avoid the rules for full public participation or speed up the realisation of the project is splitting the project in several parts and starting with a less controversial part. There is an expectation that once the EBRD has approved a loan for the first part of the project, subsequent loans for the remaining project parts will be more easily processed.

PUBLIC NOTIFICATION OF PROJECTS

For all projects the EBRD should release a Project Summary Document, which is available on the web site, but in number of cases the PSD is released late or not at all. Additionally, for category “A” projects, *“the project sponsor will be requested to provide the affected public and interested non-governmental organisations (NGOs) with notification about the nature of the operation for which financing is sought from the EBRD. The way that notification is undertaken will depend on local political, legal, and cultural practice. If*

there has been no previous notification by the project sponsor, then notification should be made no later than four weeks after the operation passes Initial Review unless the project sponsor has obtained an OpsCom’s [Operations Committee] agreement that this timescale, exceptionally, may be modified” (Environmental Procedures, 1996, p.18).

The language used by the EBRD is very confusing and open to interpretation. Project sponsors may argue that the project was mentioned in the media and therefore notification was given. In many cases, a project may have been ‘known’ for many years and even decades, but it may be important to get a more precise definition of the proposed project, as project components or routes may have changed over the years. It is difficult to influence the quality of project notification, as this is usually the time when you first hear about the project. You should not be afraid to ask for notification which you think would be adequate for the affected public.

Suggested demands on the project sponsor for notification

Information about the project under preparation should be sent to all local authorities in the area that is affected by the project with a request to make it public by placing notification in public places (e.g. official boards) and in newspapers where appropriate. Notification should include:

- A short description of the project;
- Contact points for obtaining information or registering interest;
- Basic information about any proposed participation process.

If there is any potential for trans-boundary impact as defined by the Espoo Convention, there will also be requirements for the Notification of neighbouring governments (see below).

SCOPING PROCESS

The scoping process is the consultation between the project sponsor (or the company that was hired by the project sponsor to do the EIA) and NGOs, government agencies, and other interested parties about the topics that should be addressed in the EIA documentation and the scope and approach of the public participation program. The

Environmental Procedures states that: *“For all “A” level operations, the Project Sponsor will need to have ensured through a scoping process that the key issues that need to be appraised, and the way the public will be involved in the appraisal, have been identified. This scoping process will involve contact by the Project Sponsor with representatives of the locally affected public and with government agencies, as well as with other organisations. Issues may be discussed at a scoping meeting to which the Project Sponsors will invite selected representatives of such organisations as environmental authorities and municipalities, government departments and NGOs, as well as local groups” (p19).*

The following activities should be part of Scoping.

- Announcement of Scoping arrangements
- Information package sent to key NGOs and other stakeholders
- Invite key NGOs and other key stakeholders to Scoping meeting
- Assess comments and provide feedback

Ideally, the Project Sponsor should invite interested parties at all relevant levels (local, national, international), provide them with information about the proposed project, the expected content of EIA documentation, as well as a detailed description of the public participation process. Information should be provided well before the meeting so that the public present at the meeting can prepare their comments and suggestions for improvements. Timescales between Notification and the end of Scoping should allow people and organisations to:

- Establish whether they are potentially affected by the project;
- Obtain background documentation and information;
- Prepare and submit proposals for any; suggested amendments to the EIA scope;
- Prepare for and participate in discussions.

However, often the reality is different, and there may be reasons why a company would be reluctant to engage with opponents to a project,

so it is important to let the Bank know your concerns so they can track the issue and the public interest.. For example in Ukraine, Energoatom (the Project Sponsor for the K2R4 project) "forgot" to invite some NGOs who had for a long time criticised their proposed project. Some invitations were sent out just one day before the meeting. Sometimes there is no information about the project available before the scoping meeting or the information is misleading or inadequate in scope or level of detail. Also, the status and goals of the meeting are not made clear to those who are invited. What often happens is that NGOs are often invited to a meeting where they are informed for the first time about the details of the project. They are not informed that this is considered the scoping meeting and that they have the opportunity to make comments and have input into the project preparation process. Often project sponsors do not want to discuss the public consultation process (e.g. saying that it is not prepared yet). Also several times there have been attempts to limit the time each NGO has to comment. Frequently, after the meeting NGOs are not

Suggested demands for the project sponsor regarding Scoping

- All relevant NGOs - local, national and international - must be invited to the scoping meeting.
- The following documentation should be prepared and distributed to NGOs and other interested parties 14 days prior to the scoping meeting:
 - table of contents of the EIA (e.g. chapters that will be included in the document), and the complete Environmental Procedures chapter, including alternatives;
 - description of the public participation process (when and where the public hearings will be conducted, when and where the EIA documentation will be released, internet addresses, etc.); and
 - information about the EBRD Public Participation Procedures.
- Minutes from the meeting should be distributed to all interested parties. What NGOs should address during the scoping meeting.

informed about the changes that have been made to the process or documentation. Minutes from the meetings and responses to the concrete comments or requests are not provided at all.

We suggest that you demand from the project sponsor, the things listed in the box below. These demands represent good practice.

What NGOs should address during the scoping meeting

First of all, you should not use the scoping meeting to comment on the project itself - for this you can use public hearings, or comments to the EIA documentation. The scoping meeting has very limited participation and the project sponsor is very likely to refuse to discuss comments (claiming that you should raise comments on the EIA document when it is ready). You can lose a lot of time with such discussion, while during the public hearings your comments can help to inform public and media about the problems related to the project.

You should try to address the following points:

Alternatives: Does the selection of alternatives to the project make sense or did the project sponsor choose alternatives that are evidently uneconomical or unfeasible?

Public Consultation: Is the consultation process suggested by project sponsor satisfactory to your needs? (see also sections below). Is it clear to you that you and other NGOs will get all information that you need and when you will receive this?

Further consultations: Is it clear who is the principal contact point (or person) for comments or questions?

Complexity of EIA documentation: Does the proposed scope of the EIA documentation address all expected impacts including socio-economic, decommissioning, least-cost analyses of alternatives, etc?

Projects with existing EIAs

Quite frequently, the project sponsors are coming to the EBRD for funding at time when they have already completed an EIA and had it accepted by the relevant authorities, or even when the project has already been started. The existing EIA may

or may not include scoping and public consultation, depending on legislation of that country.

In cases where project sponsors used lower standards for consultation than the EBRD requires we suggest that NGOs demand notification of projects with existing EIAs, and a secondary scoping to identify if there are any gaps in the EIA. Depending on the results you could ask for a new EIA process according to EBRD standards. However, the EIA process only makes sense when it is possible to modify or change the project through the EIA process. In a case where there are no possibilities for serious modifications and/or consideration of alternatives, it is legitimate to demand that the EBRD withdraw from the project.

ENVIRONMENTAL IMPACT ASSESSMENT

Often project sponsors (both domestic and foreign) expect that the public in Eastern Europe is less experienced in demanding their rights than in Western Europe, and they try to use lower standards than they would in the West. Also the laws requiring public consultation may be less well established or implemented. In addition, the local authorities in some areas are not enthusiastic about transparency and public meetings, which is problematic for companies who are trying to comply with the permitting process and following the advice and requirements presented by the local authorities. EBRD involvement can help to insure at least basic public participation and

Environmental Standards of projects.

“Since its establishment the EBRD has acted firmly to promote environmentally sound and sustainable development. Its double goal is to help address the environmental consequences of the previous regimes in the Bank’s region of operations, and to ensure compliance with internationally accepted environmental standards in the development of its own projects. To this end, EBRD operations are structured to meet national and existing EU environmental standards or, where EU standards do not exist, national and World Bank standards.”

EBRD Public Information Policy (2000), page 4.

access to information. The scoping process can help to build a proper participation process, if it is properly done.

On the other hand it is surprising that the EBRD policies include some practices that would not be possible in EU countries. Most problematic are provisions about the language and timing of the EIA process. Unfortunately, the EBRD still does not require the release of full EIA documentation in the national language, only the Executive Summary. Also, it accepts different standards for private and public sector projects in terms of different periods for public consultation (60 days versus 120 days).

NGOs should not accept any of the problematic practices (not matter if they are by the EBRD, national or local authorities , or project sponsors), and should use precedents from other countries or projects and demand a proper level of public participation. NGO support on both national as well as international level, and especially media, can be important tools to insuring that a proper EIA process is followed.

Time available for public consultation

When EIA documentation is prepared, it must be released for public comment. The release period must conform to national legislation and the EBRD's requirements, which are:

- EIAs for public sector projects: a minimum of 120 days before Board consideration;
- EIAs for private sector projects: a minimum of 60 days before Board consideration.

In addition, there should be a period of at least 30 days between the release of EIA documentation and the time when the Operational Committee (which represents the management of the Bank) receives the results of financial, economic, and environmental due diligence, which includes a summary of the public consultation and any issues raised to date.

The public announcement of the arrangements for EIA consultation should include the following information:

- The documentation that will be available;
- The duration of the consultation programme

Suggested demands for project sponsors regarding EIA documentation

- The consultation programme should be open to everybody and all comments and submissions should be taken into account and responded to as appropriate.
- A minimum of 120 days should be allowed for comments (for both public and private projects).
- The EIA process must be advertised in both the national and local media. Press releases alone do not guarantee coverage.
- Information about the EIA process should be sent to all local authorities in the area that is affected by the project with a request that it be made public by posting notification in public places (e.g. officials boards).
- Materials including the complete Environmental Impact Assessment documentation must be made available in the national language (in some countries they may try to offer Russian instead of English, but this also discriminates against those who do not speak foreign languages) and also the local population language.
- The EIA documentation must be available in a convenient place (e.g. city halls, info centres) where people can freely see it and study it.
- The EIA should be available in electronic form for easy and no cost copying.
- In projects that have trans-boundary impacts, the Espoo convention must be followed.
- All relevant documents and materials should be available on the website.
- Alternatives must be included in the EIA.
- Detailed responses on the comments and remarks from the public meetings as well as from written submissions should be provided within 30 days of receipt. Should the project sponsor require a period longer than 30 days to respond, the group or person who has made the comments should be informed about the delay and notified of the exact date by which the comments will be answered.

- Where the documentation can be viewed and relevant web pages;
- The arrangements for ordering hard copies, making comments and obtaining additional information;
- Information on the location and venue of public meetings;
- The context within the decision making process;
- Contact points for comments or further information.

Language Issues

The EBRD Public Information Policy states: *“An Executive Summary in an appropriate local language must similarly [to the full EIA documentation] be made available. The Bank will use its best efforts to make sponsors aware of the benefits to the consultation process of a translation of part or all of the full document”*(p.5).

This provision is not satisfactory. There are a number of cases where NGO pressure resulted in the release of the full documentation in a national language.

Availability of EIA documentation

The information policy requires that *“Project Sponsors must make the EIA publicly available for comment, including at or near the project site, and are expected to keep EIA-related documentation in the public domain at least until project completion”*(p.5). Normally, copies of the EIA should be available for consultation at a list of locations which takes into account comments from NGOs and others during Scoping. Locations typically include the project sponsor’s head and local offices and public authorities buildings. In addition, the EBRD makes available the EIA and EIA executive summary at the EBRD Bank Information Centre in London, as well as the EBRD Resident Office in the country of the project’s location. Furthermore, *“The EBRD will strongly encourage project sponsors to place EIAs on their websites, where possible, to improve public accessibility to the documents. The Bank’s Web site will, in such cases, indicate how to find the EIA on the*

sponsor’s website and, if possible, it will provide a link to the sponsor’s website”(p.5).

Often project sponsors try to limit public access by asking for prohibitively high fees for copying EIA documentation. It is usual to make electronic or paper copies of EIAs available to NGOs either free or at something like cost price, i.e. the price should not exceed the cost of commercial reproduction and delivery. NGOs and the potentially affected public should make project sponsors and the EBRD aware during the scoping stage of the most accessible format for documents to be in, as well as preferred location of documents.

To be truly open for inspection, the locations have to be accessible and advertised to the local public. The room containing the EIA has to be easy to find. There should be reasonable facilities for studying the documents and making notes and, if practicable, for making copies of selected pages. People should not have to give their names in order to see the EIA. Arrangements should be made so people can leave or submit written comments, and find out how to participate in the public meetings. People should have the option of submitting comments by telephone, fax or email. A dedicated help/comment telephone line would be helpful in many cases.

In a number of cases, the documentation has not been available in the places that it was supposed to be, or the place where it was available was not publicly accessible (e.g. to enter the place you have to show ID). In some countries, NGOs have felt vulnerable about entering premises to review documents where they had to give identification and affiliation. If this is the case, alternative arrangements should be organised (e.g., placing a set of documents in a public library or in an international NGO office for ease of access). Sometimes NGOs have found that the documentation is not complete, or part of the documentation was released later.

We suggest that NGOs report such problems to the EBRD NGO Liaison Officer or the Environmental Appraisal Unit and request that the EBRD extend the consultation period until the documentation is completely and properly available.

PUBLIC MEETINGS

There are no provisions in the EBRD Environmental Procedures for conducting a public consultation. Nevertheless it is common practice for consultation on an EIA to include one or more public meetings. As there are no specific provisions we suggest those in the box. These represent good practice.

APPLICATION OF THE ESPOO CONVENTION

The EBRD Public Information Policy explicitly states that *"for operations involving transboundary impacts, the requirements outlined in the Convention on Environmental Impact Assessment in a Transboundary Context (the Espoo Convention) must be followed"*(p.5). The Espoo Convention stipulates the obligations of Parties to assess the environmental impact of certain activities at an early stage of planning. It also lays down the general obligation of States to notify and consult each other on all major projects under consideration that are likely to have a significant adverse environmental impact across boundaries. It extends rights to participate in the EIA process to people in countries other than that where the project is located, if the project impacts may be transboundary and affect people in those other countries. The convention was drafted in 1991 and so far has been ratified by 30 countries and the European Community. The full text and more information on the convention can be found at <http://www.unece.org/env/eia> or by contacting your ministry of environment.

Private sector project sponsors have difficulty understanding what their role is where an international convention applies obligations on governments and where there is no guidance for companies on how to implement the provisions. This is particularly true if the countries affected or where the project is located have not signed or ratified the Convention. However because EBRD's policies refer to the Espoo Convention, the requirements apply to EBRD projects regardless of the state of signing or ratification. There has already been a precedent set by EBRD projects (e.g. Mochovce Nuclear Power Plant in Slovakia, and K2/R4 Nuclear Project in Ukraine) that such provisions are applicable even

Suggested demands for the project sponsor regarding Public Meetings

- Public meetings must be in convenient places at convenient times to allow for maximum participation (easy access by public transport, respect of major holidays, etc.).
- Before a public meeting the sponsor of the project should outline for NGOs and the public the structure, procedures and organisation of the meeting. If there are any objections to these issues, the project sponsor should organise a meeting with NGOs to find a solution.
- The hearing should have a qualified, independent facilitator.
- Free media access should be assured.
- Sufficient capacity of the place for the hearing has to be ensured in order not to exclude anybody interested in participating.
- Access to the hearing should be free to any individual, i.e. without inappropriate measures and limitations and not restricted in any way.
- The project sponsor should, at minimum, place advertisements detailing arrangements for the public hearings in appropriate media. For a large scale, complex project that is of significant public interest, this would mean all local newspapers, main national newspapers, and on 1 national TV and 1 national radio station. Additionally, a poster announcing the public hearings should be distributed. For smaller local projects with limited interest, this may mean local and regional media and mention of the availability of EIA documents in EBRD's offices in the capital.
- The advertisements for the public meeting should be placed a minimum 3 weeks before the meetings. The exact date and place of the meeting should be announced to all potentially affected public and NGOs that have expressed interest in participating in this process when the scoping process, where they were discussed, finished.
- Pre-printed forms should be available for those who prefer to submit a written rather than an oral question. These are then treated as if they were submitted by post.

Convention on Environmental Impact Assessment in a Transboundary Context - Espoo convention

"...the Party of origin shall... ..notify any Party which it considers may be an affected Party as early as possible and no later than when informing its own public about that proposed activity." (Art 3.1)

"The Party of origin shall provide, in accordance with the provisions of this Convention, an opportunity to the public in the areas likely to be affected to participate in relevant environmental impact assessment procedures regarding proposed activities and shall ensure that the opportunity provided to the public of the affected Party is equivalent to that provided to the public of the Party of origin." (Art 2.6)

in countries that have not ratified the Espoo convention. In the Ukrainian case, it was shown that the convention applied not only to the neighbouring countries.

The application of the Espoo convention is relatively complicated, and we would suggest to contact some of the NGOs that have experience from previous projects.

RESULTS OF PUBLIC PARTICIPATION

The Bank's Environmental policy states that *'the Bank will ensure that Project Sponsors provide adequate information on the environmental impact of projects and that comments will be taken into account in the project approval process'*. The public information objective is important, but unless comments are objectively assessed and significant points taken into account in the decision-making, the public participation will have no credibility. Indeed, it will have a negative impact on public confidence in the EBRD and project sponsors.

SOME PRACTICAL SUGGESTIONS

Become a small bureaucrat

NGO experiences with the EBRD's projects vary, even when the procedures that are adopted are higher than the national standards. Companies or authorities involved in project preparation and implementation sometimes try to hide their

responsibilities, are not willing share important information, and try to 'fast track' a project despite timing requirements for consultation. You need to be diligent to identify any misleading, incomplete, or inaccurate information or any deviation from agreed processes or policy requirements. **Therefore, it is extremely important to become a small bureaucrat, and start to build an archive with all the information related to the project.** You should ask for everything in writing, and if it is not provided to you, take as detailed notes as possible and ask for agreement later. You should keep all letters, e-mails and documents with notes on dates when you received them. Such information can be essential if you need to ask for a change or extension to the process.

Do not be afraid to articulate your demands

If you do not ask for something, you will not get it. Therefore it is important to raise your concerns and demands with the project sponsors and/or with EBRD staff. If you have problems with the project sponsor, do not hesitate to contact the NGO Liaison Officer or the Environmental Appraisal Unit at EBRD headquarters in London. You should prepare a clear description of the problem and provide evidence (e.g. copies of documents, notes from the meetings). Your country will be represented by a member of the Board of Directors, and you can also write to him or her with your comments.

The EBRD should serve you and not opposite way

Remember that the EBRD is paid from your taxes, so it should serve you.

Make your demands as soon as possible

It is clearly in the interest of the NGOs, project sponsors, and EBRD that comments are made at the earliest possible stage. For example, if a document should be translated, document your request to the project sponsor and copy it to the relevant EBRD staff. If you wait to comment on a concern until immediately before a Board meeting, it may be too late to get actions undertaken—if you comment early, your concerns can be taken into account, and you will

have documented your attempts to get information.

The EBRD Resident Offices

Sometimes the EBRD Resident Offices have "adopted" the local culture too much. They do not provide information or publications, they refuse to speak with NGOs, etc. If you have such problems, you can contact the Bank's NGO Liaison Officer. If the problems persist, inform the management of the bank about it in writing.

Outreach/NGO Relations Unit

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E-mail address: ngo@ebrd.com

Environmental Appraisal Unit

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Project Evaluation Department

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Suggested Music

Sometimes you have to work hard to insure the proper participation of people who are affected by a proposed project or to insure protection of the environment. Sometimes you have to fight for every paper that you have the **right** to get. This can cause a lot of frustration. Therefore, we suggest that from time to time you listen to "Get Up, Stand Up" by Bob Marley. He sings, "Stand up for your rights, don't give up the fight".

January 2002

The CEE Bankwatch Network is an international non-governmental organisation (NGO) with member organisations from countries of Central and Eastern Europe and the Commonwealth of Independent States. The basic aims of the network are to monitor activities of the International Financial Institutions in the region, and to promote constructive alternatives to their policies and projects. The CEE Bankwatch Network was formally set up in 1995, and has become one of the strongest networks of environmental NGOs in Central and Eastern Europe.

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