

Bulgaria:

Centre for Environmental
Information and Education
(CEIE)
For the Earth!

Czech Republic:

Centrum pro dopravu a
energetiku
Hnuti Duha

Estonia:

Estonian Green Movement-FoE

Georgia:

Green Alternative

Hungary:

Nature Protection Club of
Eotvos Lorand University (ETK)
National Society of
Conservationists-FoE (NSC)

Lithuania:

Atgaja

Macedonia:

Eko-svest

Poland:

Polish Green Network (PGN)
Institute of Environmental
Economics (IEE)

Russia:

Sakhalin Environment Watch

Slovakia:

Friends of the Earth - Center
for Environmental Public
Advocacy (FoE-CEPA)

Ukraine:

National Ecological Centre of
Ukraine (NECU)

CEE Bankwatch Network's
mission is to prevent
environmentally and socially
harmful impacts of
international development
finance, and to promote
alternative solutions and public
participation.

TO:

Sir Suma Chakrabarti
President
European Bank of Reconstruction and Development
One Exchange Square
London EC2A 2JN
United Kingdom

Dear Sir Suma Chakrabarti,

We would like to bring your attention to the necessity of improving the Mining Strategy review process.

The bank published a draft strategy on 25 April for public review. Consultations were held and comments collected by the bank until 24 June. A summary of the public comments received and staff responses will be made available to the Board of Directors in a report before final approval by the board, indicated for the fourth quarter of 2012.

Yet during consultations with the bank in May and June in London, Sofia, Ulaanbaatar and Moscow our experience shows that public opinion differs fundamentally from the EBRD's own vision of the strategy, and it is important to ensure that the draft strategy incorporates and addresses such public comments. More specifically it is unclear what the strategy proposes with regards to thermal coal, as the draft is extremely vague on this subject.

The current review process does not provide stakeholders the opportunity to see all the comments submitted to and replies from the bank until after the strategy is approved. This approach undermines constructive policy dialogue and inhibits the strategy development process and public participation in it.

The mining strategy has been under preparation for over two years. Workshops and discussions were held in 2009 in London, for which Bankwatch prepared recommendations for the strategy, and issues with controversial mining projects have been continually communicated to the bank in the meantime. However until the draft strategy document was released earlier this year, the public was unable to get any clear information on what would be in the document – not even the main strategic directions.

We recommend that the EBRD follow the example of the European Investment Bank with respect to strategy formulation. The revision of the EIB's transparency policy consisted of two stages: in the first stage the bank called for the public's views on the existing policy and in the second stage it provided an opportunity to comment on the new policy proposal. The views were considered before the final policy document was published. At both stages the EIB informed the public about how its views were taken into account. We consider this process to have been of a very high standard and therefore recommend such a process for the Mining Strategy revision.

We therefore propose having the final revised draft strategy made available to the public with a summary of comments received and staff responses *before* the policy is considered for final board approval.

Thank you in advance for the positive consideration of this request.

Best regards,
Mark Fodor



Executive Director
CEE Bankwatch Network

The letter is endorsed by:

Yuri Urbansky, National Ecological Centre of Ukraine

Ana Colovic Lesoska, Eko-svest, Macedonia

Huub Scheele, Both ENDS, Netherlands

Elona Saro, Eden, Albania

Miodrag Dakic, President, Center for Environment, Banja Luka, Bosnia and Herzegovina

Dana Yermolyonok, Center for Introduction of New Environmentally Safe Technologies, Kazakhstan

Regine Richter, urgewald, Germany

Inga Zarafyan, Information NGO EcoLur, Armenia

Todor Slavov, Za Zemiata, Bulgaria

Sukhgerel Dugersuren, executive director, OT Watch, Mongolia

Richard Solly, Co-ordinator, London Mining Network

Patrycja Romanyuk, Polish Green Network

Meruert Makhmutova, Director of the Public Policy Research Center, Almaty, Kazakhstan

Natalia Ablova, Director, Bureau on Human Rights and Rule of Law, Kyrgyz Republic

Mirvari Gahramanli, Oil Workers Rights Protection Organisation, Azerbaijan

Namik Rzaev, "Ecomed", Azerbaijan

Galina Chernova, Center "Globus", Atyrau, Kazakhstan

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Sergey Vorsin, Greenpeace-Russia

Tolekan Ismailova, Director, "Citizens Against Corruption", Kyrgyz Republic

Alexey Knizhikov, extractive industry officer, WWF Russia

Istvan Farkas, Executive President, National Society of Conservationists (MTVSZ) – NSC, Hungary

Christoph Wiedmer, Director, Society for Threatened Peoples – Switzerland

Kate Watters, Crude Accountability, USA