

CEE Bankwatch Network
Na Rozcesti 1434/6
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Czech Republic
Email: main@bankwatch.org
http://www.bankwatch.org

Bulgaria:
Centre for Environmental Information
and Education (CEIE)

Za Zemiata, For the Earth

Croatia:
Green Action

Czech Republic:
Centrum pro dopravu a energetiku
(CDE)

Hnuti DUHA

Estonia:
Estonian Green Movement-FoE

Georgia:
Green Alternative

Hungary:
National Society of Conservationists -
Friends of the Earth Hungary (MTVSZ)

Latvia:
Latvian Green Movement

Lithuania:
Atgaja

Macedonia:
Eko-svest

Poland:
Polish Green Network (PGN)

Russia:
Sakhalin Environmental Watch

Serbia:
Center for Ecology and Sustainable
Development (CEKOR)

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: Mr Alistair Clark, Corporate Director

Environment and Sustainability Department

European Bank for Reconstruction and Development
One Exchange Square
London EC2A 2JN
United Kingdom

22 December, 2014

Dear Mr Clark,

Thank you for your response, dated 12 December 2014, to our letter to the President Chakrabarti regarding the NAK Naftogaz Project.

We take note of the deferral for the release of the PSD granted for this project and kindly point out that it is advisable for such important information to be included into PSDs at the time the respective decision of deferral is taken. We also note the recent PSD updates which shed light on some of the issues of concern with this project.

While we understand the necessity and urgency of the Project's implementation, we believe it is important for the bank to ensure that quality, transparency and public scrutiny are not compromised even in cases of projects fast-tracking. In situation with shortened time period of the PSD disclosure, meaningful consultations can be ensured by prompt and proactive disclosure of project documentation for both local and other interested stakeholders. In the case of NAK Naftogaz Project, as we mentioned in our previous correspondence, there is hardly any environmental and social information about this project accessible to public. To date Ukrtransgas has neither confirmed receipt nor replied to NECU's request for EIA disclosure¹ thus violating the requirements of national law on public information disclosure.

We therefore urge the EBRD to instruct its client Ukrtransgas to fully disclose the requested environmental information with no further delay. We hope that for future projects the bank will be proactively seeking to ensure that meaningfulness of consultations is not compromised even in projects being fast-tracked. This can be done by proactive dissemination of environmental and social information by the project's promoter and the EBRD, ensuring that other stakeholders are able to participate in meetings organized for local communities.

Sincerely,

Iryna Holovko

National Campaigner for Ukraine

¹ NECU letter № 125-1/208 from 8.10.2014;

□ NECU letter № 125-1/208 from 8.10.2014;