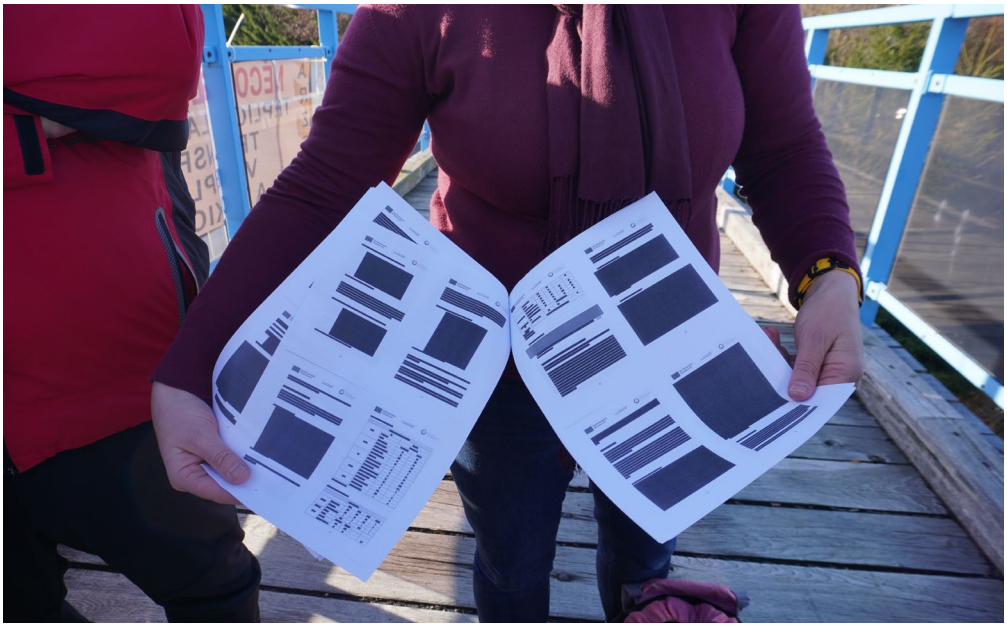
Monitoring what matters: Public participation as a systemic issue for the EBRD



A fully redacted feasibility study for a lithium mining project in Cínovec in the Czech Republic.

Introduction

Public participation is a cornerstone of responsible public finance and a prerequisite for delivering genuine development impact. Yet, evidence from civil society organisations and accountability mechanisms shows that EBRD-financed projects often fall short in ensuring meaningful stakeholder engagement. Failures such as superficial consultations, the exclusion of affected communities, weak grievance mechanisms, and retaliation against rights holders undermine both the EBRD's development impact and its human rights safeguards.

To better understand and address these systemic shortcomings, the EBRD must establish continuous monitoring of public participation practices at the project level. Such monitoring would help the Bank learn what works and what does not across different countries, sectors and clients, while also tracking trends over time to identify early warning signs in civic space and the broader business environment. Data-driven analysis would not only help mitigate project-level risks, but also strengthen institutional learnings and the development impact of EBRD

For more information

Nina Lesikhina
Policy Officer
CEE Bankwatch Network
nina.lesikhina@bankwatch.org

operations, particularly concerning the Bank's mandate to supporting democratic transition in its countries of operations.

In early 2025, we reviewed publicly available information to assess the EBRD's approach to monitoring and reporting on stakeholder engagement across its operations. Our analysis revealed that accessible information on public participation practices reported by the EBRD, as well as evidence of institutional learning at the project level, is largely lacking.[1] Therefore, Bankwatch has undertaken a preliminary effort to collect and analyse publicly available data on EBRD-financed projects to identify patterns of public participation across countries and sectors, and to demonstrate the critical importance of systematic monitoring.

This briefing illustrates how the EBRD could benefit from regular and effective monitoring of participation at the project level to inform corrective actions and enhance management strategies. Given the Bank's democracy mandate, its influence on public participation in decision-making should be assessed as an integral part of its development impact. To achieve this, an effective system of monitoring and reporting on stakeholder engagement must be introduced.

Methodology

The primary objective of this briefing was to demonstrate how systematic monitoring of stakeholder engagement at the project level can help identify recurring patterns in public participation practices and strengthen institutional learning towards improving safeguard implementation. It also aims to enhance understanding of national and sectoral contextual risks to better inform investment and policy decisions. We reviewed 38 projects[2] supported by the EBRD across 15 countries, covering the period from 2009 to the present. Some of these projects have since been completed for various reasons.

For 23 projects, information on public participation was provided by Bankwatch experts and our partner civil society organisations that have been monitoring EBRD operations for several years. They submitted data through an online survey containing questions about project-related concerns, affected rights holders, and public participation practices, supported by links to publicly available monitoring reports. In addition to Bankwatch experts, the following civil society partners kindly contributed to data collection: A11 Initiative (Serbia), CINVALD (Czech Republic), Oyu Tolgoi Watch (Mongolia), Uzbek Forum for Human Rights (a Berlin-based non-governmental organisation working on Uzbekistan), Ezgulik (Uzbekistan), Sarajevo Open Center (Bosnia and Herzegovina), CINEST (Kazakhstan), EcoRight (Armenia), Green Salvation (Kazakhstan), Ecoaction (Ukraine), and representatives of affected communities in Bosnia and Herzegovina.

[1] Nina Lesikhina, The role of stakeholder engagement in the EBRD's impact monitoring and reporting, *CEE Bankwatch Network*, 30 May 2025.

[2] CEE Bankwatch Network, Dataset: Public participation in EBRD-funded projects (2009-2024), *CEE Bankwatch Network*, 2025.

In addition, we reviewed the IPAM Registry [3] to analyse EBRD-project-related complaints submitted between 2019 and 2024,[4] alleging gaps in public participation in at least 15 cases. To better understand the complainants' perceptions of stakeholder engagement, our analysis focused on the allegations rather than on the outcomes of the complaint resolution process. is information – obtained exclusively from the IPAM Registry, primarily from its Requests and Compliance Assessment Reports – has not been independently verified by additional sources. Basic project data – such as location, business sector, environmental and social risk category, EBRD notice type (public or private sector), investment size, client and project name, and objective – was obtained from the EBRD Project Finder.

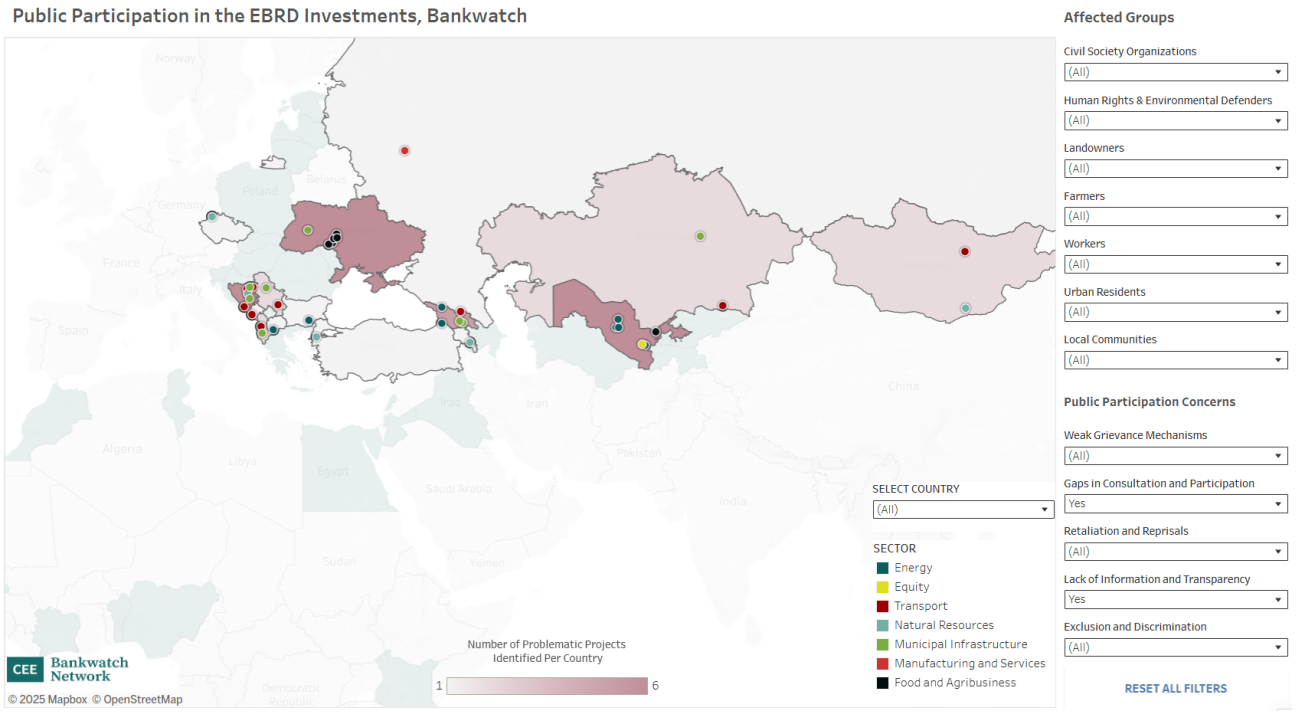
Public participation practices in EBRD-supported projects were systematically assessed against six core criteria: access to information, consultations, inclusion, grievance mechanisms, retaliation, and enabling conditions. To uncover recurring patterns and systemic shortcomings in the EBRD's approach to stakeholder engagement, we also considered the location, environmental and social risk category, business sector, and client type for each project. For each of these categories, we calculated the number of problematic projects identified, the total and average number of public participation concerns, and the percentage of projects whose number of concerns exceeds the average threshold for the data sample. We also identified the key patterns in public consultation concerns specific to each category.

The geographic scope of the analysis was defined by the availability of data in the IPAM Registry and public monitoring reports. Consequently, the findings primarily reflect experiences from 15 countries in central and eastern Europe, the Western Balkans, Central Asia, and the Caucasus – regions in which the EBRD has had a longer operational presence and a larger project portfolio. These regions are also relatively more conducive to raising complaints with IPAM and independent public monitoring in general. While the EBRD suspended its operations in Russia in 2022, the analysis includes a complaint submitted to IPAM prior to that decision. Additionally, given that the Bank only commenced operations in sub-Saharan Africa in 2025, the regional representativeness of the dataset is limited.

To visualise emerging patterns, we created a demonstration map based on the collected data. This map provides more detailed information on the specific projects, along with references to sources and public monitoring reports.

[3] Independent Project Accountability Mechanism, Case registry, *European Bank for Reconstruction and Development*, accessed 10 December 2025.

[4] In line with the EBRD's Project Accountability Policy. See: European Bank for Reconstruction and Development, Project Accountability Policy, *European Bank for Reconstruction and Development*, April 2019.



We recognise the limitations of this analysis with regard to project selection and sample size (38 projects) in comparison with the EBRD's project portfolio. The available information does not cover all EBRD investment projects due to limited information disclosure, restricted civic space, or high-risk contexts that make independent monitoring or speaking up about project-related concerns difficult in some countries.

These gaps are reflected in the narrow geographic scope of the IPAM complaints, as well as the limited capacity of Bankwatch and its civil society partners to collect a larger dataset. While this information is not exhaustive, it does provide a sufficient basis to demonstrate the potential approach to, and value of, systematically monitoring public participation across EBRD operations.

Public participation concerns dominate

All of the 38 projects (100%) identified reveal at least one issue related to access to information, consultation or inclusion. Under the access to information and transparency category, the top three recurring concerns (70 to 80% of projects) include a lack of information on project risks and impacts, poor transparency in decision-making processes and timelines, and the absence, or outdated nature, of stakeholder engagement plans. Over 80% of the cases involve multiple overlapping failures – typically a combination of poor information disclosure, a lack of communication on grievance mechanisms, and weak public reporting.

Under the consultation and participation category, the most frequent concerns (70 to 80% of projects) include a lack of early-stage (pre-decision) consultations by companies, reluctance to incorporate community feedback, and a lack of meaningful or ongoing engagement by the EBRD and its clients. These concerns are followed by an absence of consultations by local authorities, a lack of response to petitions and appeals, and late-stage consultations offering no real influence (50% of projects).

Regarding inclusion, the most common concerns identified are the exclusion of affected rights holders from environmental and social impact assessments and mitigation planning (in nearly every case), followed by their widespread exclusion from project monitoring and decision-making processes. In around 30% of projects, the exclusion of vulnerable groups was specifically reported.

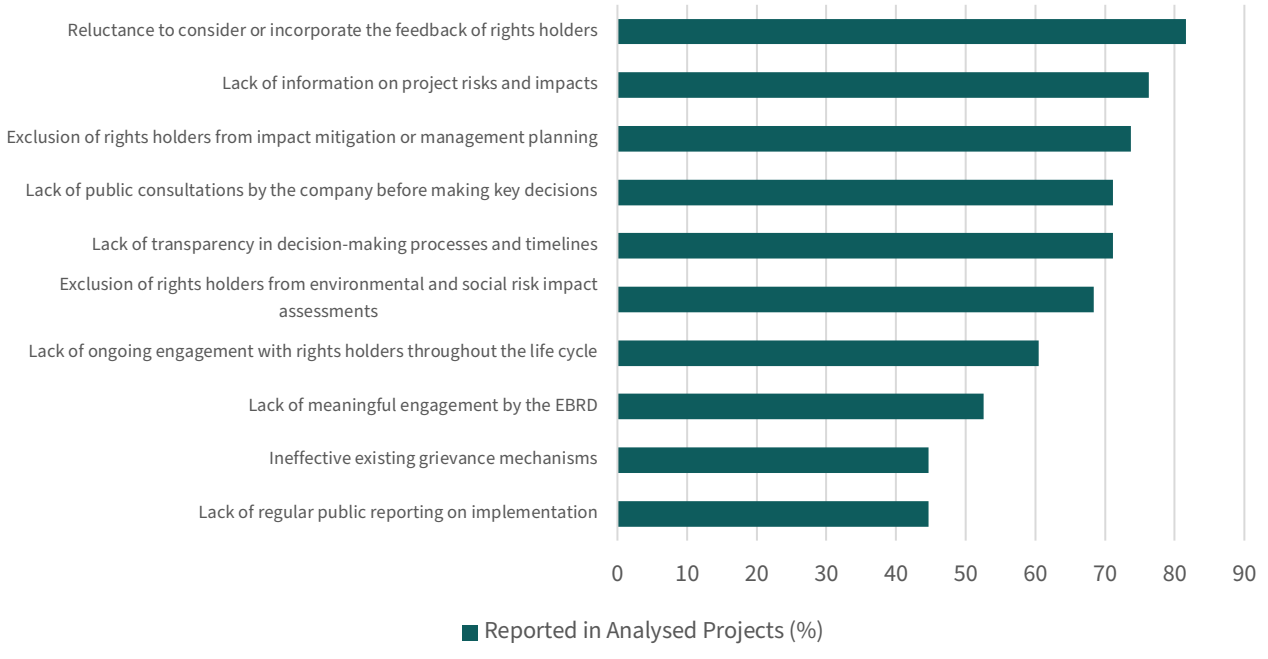
In 85% of projects, at least one concern related to grievance redress was recorded – mainly the absence or inaccessibility of project-level mechanisms, or the existence of dysfunctional mechanisms. Approximately 24% of projects highlighted a lack of dedicated procedures for reporting gender-based violence and harassment.

In 82% of projects, grievances were escalated through formal complaints to third-party accountability mechanisms. IPAM dominates the accountability landscape, appearing in around 70% of all cases. Ten cases triggered multiple mechanisms, including IPAM, other lenders' accountability mechanisms, and state-led processes, while only a few projects pursued international treaty mechanisms, such as the Bern Convention.

Regarding safe space for public participation, cases of retaliation or fear of retaliation against affected rights holders were reported in 47% of projects, alongside actions contributing to community division and fragmentation. In two cases, instances of gender-based violence and harassment were identified, and in two others a lack of access to independent trade unions and freedom of association was reported.

In at least 42% of projects, a lack of enabling conditions for effective public participation was reported. The most common issues included an absence of processes and procedures to facilitate participation in decision-making, weak capacity support for rights holders and communities, and a failure to address persistent power imbalances during the engagement process.

Graph 1: Public participation concerns across 38 EBRD-financed projects



Geography of concerns

Based on the number of problematic projects identified in each country, Ukraine, Uzbekistan, Bosnia and Herzegovina, and Georgia have the highest totals.[5] In Ukraine, most cases are linked to the agriculture sector; in Bosnia and Herzegovina, they relate mainly to a mix of transport and municipal infrastructure projects; and in Uzbekistan, they concern both agriculture and energy.

Indorama Agro: Uzbekistan's infamous cotton project

The Indorama Agro project – a USD 130 million investment by the European Bank for Reconstruction and Development (EBRD) and the International Finance Corporation (IFC) to modernise cotton farming in Uzbekistan – is a stark illustration of how the absence of public participation can result in serious harm to people and the environment. It also raises broader concerns about compliance with the safeguards of international financial institutions.

Affected communities, primarily Uzbek farmers and workers, had limited access to information on land consolidation, environmental and social risks (including pesticide use) and expected impacts on their livelihoods. Although key environmental and social documents were shared on Indorama Agro's website, no meaningful outreach was conducted through the traditional media or on social media – the communication platforms most commonly used by rights holders in rural Uzbekistan. Public consultations were moved online during the COVID-19 pandemic, but limited internet access in the region prevented local communities from meaningful engagement. Additionally, the leaflets and feedback forms distributed among the local population were inadequate, resulting in negligible participation and response rates.[6]

Stakeholder engagement plans were either unavailable or not updated in a timely manner, and neither Indorama Agro nor the local authorities conducted consultations before approving large-scale land transfers. Furthermore, workers and independent monitors documenting abuses faced intimidation, dismissals and surveillance, creating a climate in which safe participation was impossible. A combination of ineffective and distrusted grievance mechanisms with persistent power imbalances meant that rights holders were excluded from impact assessments, monitoring, and mitigation planning, resulting in the neglect of livelihood restoration. Thousands of farmers and workers who lost land and income have never been compensated.[7] The first independent trade union[8] established at Indorama Agro was subsequently dismantled through union-busting tactics.

[5] This finding applies to our limited dataset and may differ from the EBRD's portfolio.

[6] Nina Lesikhina, Pulling the 'cotton' over Uzbek eyes at latest EBRD investment, *CEE Bankwatch Network*, 26 January 2021.

[7] Joint civil society statement: Urgent call on the IFC and the EBRD for remedy and accountability at Indorama Agro in Uzbekistan, *CEE Bankwatch Network*, 3 April 2025.

[8] Nina Lesikhina, Indorama Agro workers are fighting to register the first independent trade union in Uzbekistan, *CEE Bankwatch Network*, 26 March 2021.

Despite sustained engagement by civil society organisations with multiple lenders, including the EBRD, no significant improvements have been made. In 2023, the Uzbek Forum for Human Rights and Bankwatch filed a compliance review request with the EBRD Independent Project Accountability Mechanism (IPAM) – currently under investigation – documenting land seizures, mass lay-offs, labour abuses and reprisals.[9] In November 2024, IPAM announced the start of its investigation. In January 2025, Indorama Agro prepaid its loans. The EBRD project status page is now marked as 'complete'.[10]

Regarding the average number of reported public participation concerns per country, the Czech Republic, Mongolia and Armenia rank the highest, each represented by mining projects mainly – confirming the particularly high risks and impacts associated with this sector. Comparing the number of projects in each country that exceed the average concern threshold for the sample, Ukraine, Armenia and the Czech Republic have the highest totals, followed by Serbia, Mongolia and Uzbekistan.

Table 1. Public participation concerns by country.

Country	Number of projects	Total number of concerns	Average number of concerns per country	Percentage of projects with a high number of concerns*	Key patterns and characteristics
Uzbekistan	6	67	11.2	50%	Lack of transparency and early consultations, inaccessible grievance systems, retaliation and fear among communities, exclusion of vulnerable groups, prevention of gender-based violence and harassment.
Georgia	5	55	11	40%	Exclusion of indigenous and vulnerable groups, retaliation against defenders, lack of meaningful consultation, weak grievance mechanisms.
Bosnia and Herzegovina	6	71	11.8	33%	Repetitive consultation and information disclosure concerns, ineffective grievance mechanisms, limited responsiveness from EBRD or authorities (multiple IPAM complaints).

[9] Nina Lesikhina, Lynn Schweisfurth, EBRD's Independent Project Accountability Mechanism investigates the Indorama Agro cotton project in Uzbekistan, *CEE Bankwatch Network*, 16 January 2025.

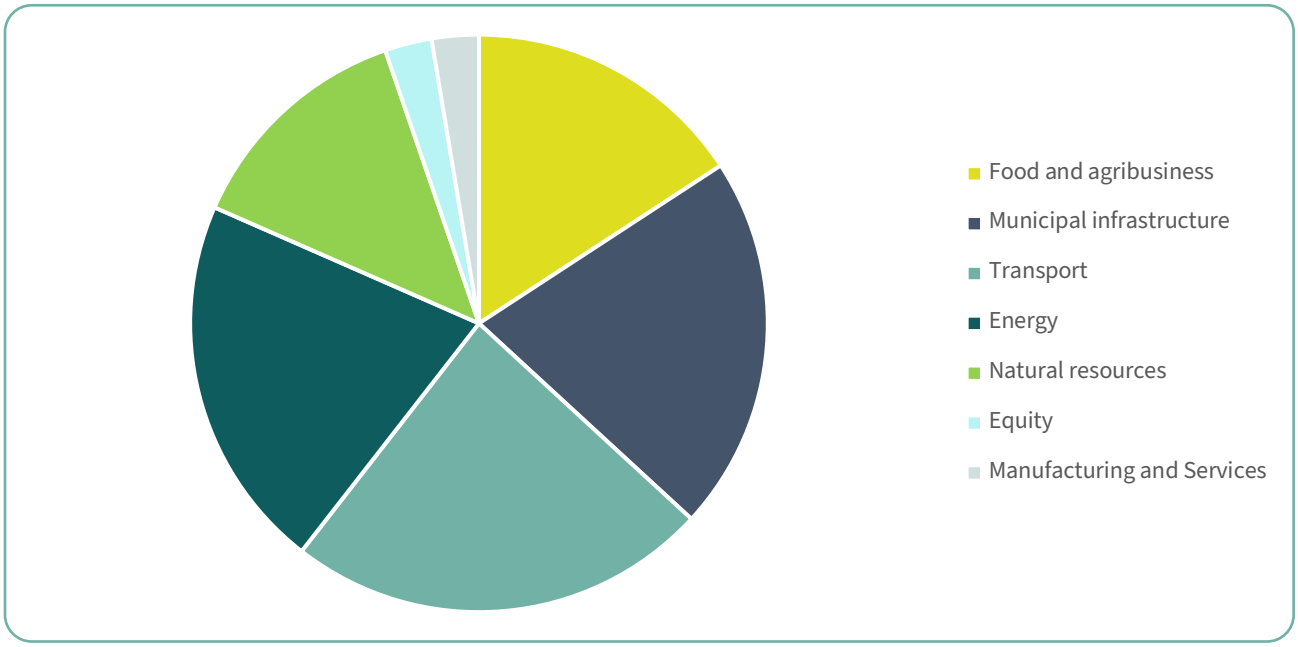
[10] European Bank for Reconstruction and Development, Indorama Agro Working Capital Loan, *European Bank for Reconstruction and Development*, accessed 10 December 2025.

Ukraine	6	85	14.2	100%	Systemic gaps across the EBRD's MHP portfolio – repeated consultation and information concerns, weak inclusion, fear of retaliation, limited remedy pathways.
Serbia	2	26	13	50%	Lack of transparency, community fragmentation and reprisals, tokenistic engagement processes, weak grievance handling.
Mongolia	2	30	15	50%	Exclusion of indigenous peoples, lack of meaningful EBRD engagement, ineffective grievance mechanisms.
Albania	2	14	7	0%	Formal consultations conducted too late to influence decisions, information gaps, exclusion of communities from planning.
Kazakhstan	2	16	8	0%	Lack of transparency and ongoing engagement, limited reporting, community engagement mostly formalistic.
Armenia	1	16	16	100%	Amulsar mine project – full-scale breakdown of participation, retaliation, multiple accountability cases (IPAM, Bern Convention).
North Macedonia	1	7	7	0%	Lack of meaningful consultation, inclusion gaps, weak public participation procedures.
Bulgaria	1	8	8	0%	Lack of information and formalistic consultations, weak social dialogue, and grievance accessibility.
Czech Republic	1	18	18	100%	Limited transparency and stakeholder influence, insufficient public engagement in equity projects.
Montenegro	1	8	8	0%	Transparency and consultation gaps.
Russia	1	11	11	0%	Formalistic consultations, weak grievance systems, and no meaningful participation.
Türkiye	1	5	5	0%	Consultation gaps, some fear of retaliation.

*Projects with more than 12 concerns, which is above the dataset average.

High-risk sectors

Graph 2: Projects with public participation concerns by sector (sample: 38 projects)



The transport, municipal infrastructure, and energy sectors contain the highest number of problematic projects, while the food and agribusiness sector leads in the total number of public participation concerns. When measured by the average number of concerns per sector as well as by the number of projects in each sector that exceed the average concern threshold for the sample, the food and agribusiness and natural resources sectors rank the highest.

Table 2. Public participation concerns by sector.

Sector	Number of projects	Number of concerns	Average number of concerns per sector	Percentage of projects with a high number of concerns*
Equity	1[#]	16	16	100%
Food and agribusiness	6	93	15.5	100%
Natural resources	5	68	13.6	60%
Municipal infrastructure	8	88	11	37.5%
Manufacturing and services	1	11	11	0%
Transport	9	86	9.5	11%
Energy	8	75	9.4	37.5%

*Projects with more than 12 concerns, which is above the dataset average; [#]renewable energy project.

In the food and agribusiness and municipal infrastructure sectors, concerns over access to information, consultation, and inclusion are high. Risks of retaliation and community division are prominent among agriculture projects. In the transport sector, there are concerns over significant participation gaps, exclusion, and ineffective grievance responses. Projects in the energy and natural resources sectors reveal shared concerns regarding a lack of transparency and meaningful public participation, ineffective grievance redress mechanisms, and a high number of retaliation cases.

Table 3. Common public participation concerns by sector.

Sector	Common concerns
Transport	Insufficient consultation on routing, land acquisition disputes, formal complaints filed (several IPAM cases).
Municipal infrastructure	Lack of transparency and community inclusion, frequent information gaps.
Natural resources	Strong community opposition due to environmental concerns; issues with free, prior, and informed consent, multiple project-related grievances, retaliation concerns.
Energy	Environmental impact concerns, consultations often conducted after decisions are made, reported cases of retaliation against activists.
Food and agribusiness	Land-use changes affecting farmers, weak engagement with rural communities, complaints to state authorities in some cases.
Manufacturing and services	Environmental pollution concerns, local residents not properly consulted.

Client issues

Private sector projects exhibit the highest number of public participation concerns across all categories, and also the largest percentage of projects exceeding the average concern threshold (72%). Although the average number of concerns per EBRD notice type is relatively similar between private and public operations, the distribution across categories differs notably. In private projects, concerns related to information disclosure and retaliation risks are particularly prominent compared to public projects. Conversely, in public sector projects, the greatest number of concerns per project is concentrated around consultation and participation (3.5 on average), while in the private sector, issues are most pronounced in access to information and transparency (4.5 on average).

Corridor Vc: Persistent failures in public participation in Bosnia and Herzegovina

The EU's flagship infrastructure project in Bosnia and Herzegovina – the 330-kilometre Corridor Vc motorway, manged by JP Autoceste and financed with over EUR 4.5 billion in loans and grants from the EU, the European Investment Bank (EIB) and the EBRD – has been plagued by persistent failures in public participation. These shortcomings have undermined the project's social legitimacy, fuelled discontent among affected communities, raised significant compliance concerns, and resulted in the filing of numerous complaints with international financial institutions.[11]

Public participation in the selection and approval of the current Corridor Vc motorway route south of Mostar was non-existent. After the Federation of Bosnia and Herzegovina government introduced a new valley route in 2016, over 3,000 local residents signed a petition calling for a return to the previously preferred ridge route. Despite this substantial public opposition, communities were never consulted about the new route or its implications, including the loss of farmland, homes, biodiversity and cultural monuments, and had no opportunity to voice concerns before the project-level spatial plan was approved by the Federation of Bosnia and Herzegovina parliament in early 2017. At a January 2017 public meeting where the new route was presented – but not consulted – no assessment of alternatives was discussed, questions were dismissed, and the meeting ended in chaos.

The environmental and social impact assessment lacked information on route alternatives, with public consultations held in 2020 characterised by limited participation. Due to COVID-19 restrictions, only a small number of local residents were able to attend, with employees of JP Autoceste making up most of the attendees. The presentation provided scant information on community impacts, and those who raised concerns about the routing were told it was not a topic for discussion, as the route had already been approved long ago.[12]

Communities also reported the illegal or non-consensual placement of markers on private properties in 2019 and 2020 – actions perceived as coercive, especially given that many owners had not received any information on compensation or eligibility criteria. In addition, people whose land is not needed for the highway but lies as close as one metre from the route have not been consulted about the routing or its impacts and have been offered no compensation.[13]

Many of those whose land is being expropriated have submitted complaints to the domestic courts as well as various international accountability mechanisms, including IPAM. In January 2024, IPAM's compliance

[11] Alma Midžić, Corridor Vc in Bosnia and Herzegovina: Environmental and social impacts can no longer be ignored, *CEE Bankwatch Network*, 9 October 2025.

[12] Fidanka Bacheva-McGrath, Connecting or Dividing? The South Mostar section of Corridor Vc in Bosnia and Herzegovina, CEE Bankwatch Network, 26 January 2021.

[13] Pippa Gallop, The Corridor Vc in Bosnia and Herzegovina: A decisive test for EU standards, *CEE Bankwatch Network*, 5 April 2024.

review confirmed, among other findings, that the route was chosen without consultation and that vulnerable groups had not been properly identified.

Table 4. Public participation concerns by EBRD notice type.

EBRD notice type	Number of projects	Number of concerns	Average number of concerns per EBRD notice type	Percentage of projects with a high number of concerns*
Private	21	276	10.2	72%
Public	17	161	9.5	13%

*Projects with more than 12 concerns, which is above the dataset average.

It is important to note that in some cases where IPAM complaints were filed or civil society raised concerns, the same company had received multiple loans from the EBRD over time, for example, MHP in Ukraine.

Does risk categorisation help?

With regard to the EBRD's environmental and social risk categories, category B (medium risk) projects perform weakest in access to information, while category A (high risk) projects feature the highest number of concerns related to retaliation prevention. Although the average number of concerns per risk category is quite similar across both categories, the distribution across categories differs. Both risk categories record comparable levels of shortcomings in consultation, inclusion, and grievance redress, but retaliation-related issues are nearly twice as frequent in category A projects, whereas information disclosure failures are more prominent in category B projects (4.4 compared to 2.8 on average). Comparing the percentage of projects that exceed the average concern threshold, 50% of the projects analysed fall under category B.

Table 5. Public participation concerns by EBRD environmental and social risk category.

Category	Number of projects	Number of concerns	Average number of concerns per risk category	Percentage of projects with a high number of concerns*
A	18	199	11.1	39%
B	20	238	11.9	50%

*Projects with more than 12 concerns, which is above the dataset average.

Affected rights holders

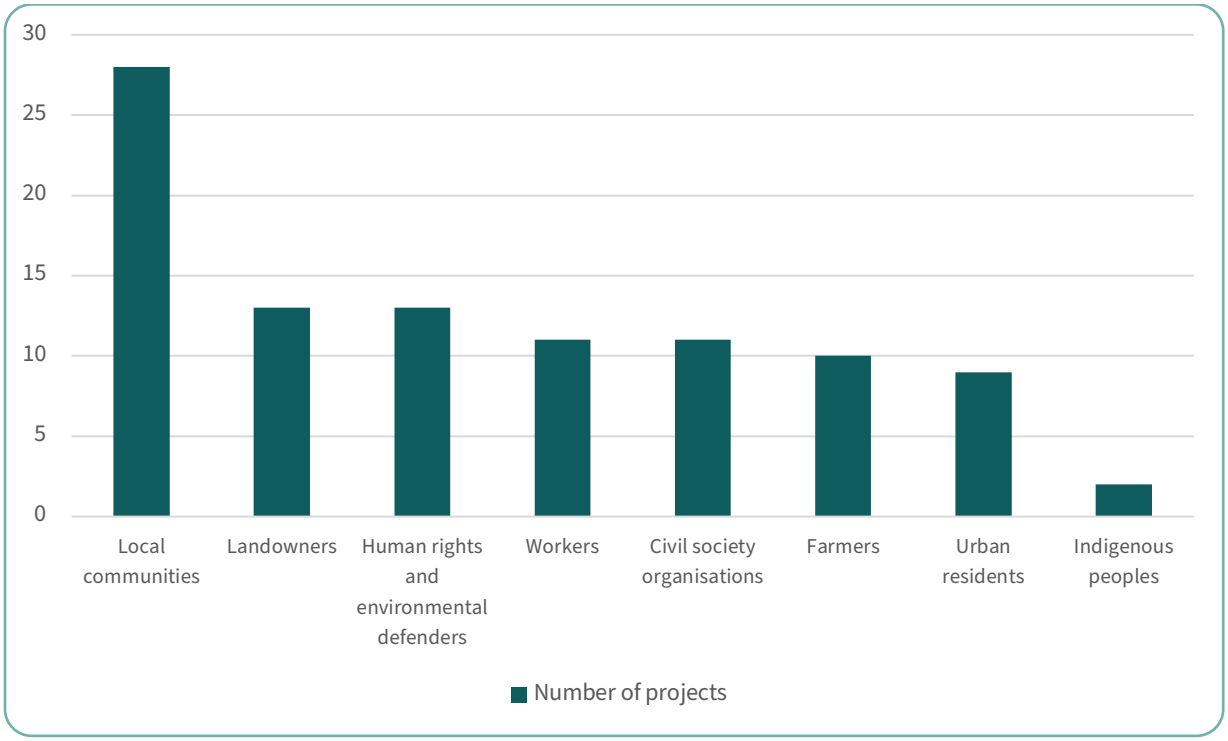
Local communities emerge as the most consistently affected rights holders, appearing in over two-thirds of all projects regardless of sector or region. They are followed by landowners, whose involvement spans the energy, natural resources, municipal infrastructure, and transport sectors. Farmers and workers also feature prominently, particularly in the food and agribusiness, transport, and energy sectors. In addition, human rights and environmental defenders are repeatedly identified among the affected rights holders,

especially in the energy, natural resources, and food and agribusiness sectors. Residents and workers are the most affected groups in the municipal infrastructure and transport sectors, while farmers and rural populations are the most affected by the food and agribusiness and energy sectors. In the natural resources sector, affected rights holders frequently include landowners, indigenous peoples, and environmental or human rights defenders, highlighting overlaps between environmental and land-use impacts.

Table 6. Affected rights-holder categories and their frequency across sectors.

Affected rights holders	Number of mentions	Sectors
Local communities	28	All sectors
Landowners	13	Energy, transport, municipal infrastructure, natural resources
Human rights and environmental defenders	13	Food and agribusiness, natural resources, energy
Workers	11	Transport, municipal infrastructure, food and agribusiness
Civil society organisations	11	Energy, food and agribusiness, natural resources, transport
Farmers	10	Food and agribusiness, energy, transport
Urban residents	9	Municipal infrastructure, transport
Indigenous peoples	2	Natural resources, energy

Graph 3: Groups of affected rights holders across 38 EBRD-financed projects



Civil society organisations, along with human rights and environmental defenders, were identified as affected groups in 9 out of 15 countries, including Uzbekistan, Ukraine, Georgia, Armenia, Mongolia, Kazakhstan, North Macedonia, and Bosnia and Herzegovina.

Accountability mechanisms activated

In 31 of the 38 projects, accountability mechanisms were triggered. These cases are concentrated primarily in the transport (9), energy (7), municipal infrastructure (6), natural resources (5), and food and agribusiness (3) sectors. In 27 of these projects, formal complaints were submitted to IPAM. Nine projects were brought before state-led redress mechanisms, and six triggered complaints to other lenders' accountability mechanisms. Two projects resulted in requests being filed with the secretariat of an international treaty, specifically, the Bern Convention. In 10 cases, multiple accountability mechanisms were activated. These projects are predominantly high-risk operations in the natural resources, transport, and energy sectors.

Positive experiences with public participation

Across the cases reviewed, positive examples of meaningful stakeholder engagement at the project level were limited, yet several patterns emerged. In a number of instances, stakeholders observed that the EBRD organised or facilitated dialogue events aimed at explaining project impacts and gathering feedback.

These efforts occasionally included joint site visits involving multiple stakeholders (Zarafshon Wind, Uzbekistan), thematic engagement (Sarajevo E-Tram Extension, Bosnia and Herzegovina) and consultations with civil society organisations representing affected people in high-risk contexts (Indorama Agro, Uzbekistan), and dedicated forums designed to facilitate dialogue between public institutions, service providers and affected rights holders (Tbilisi Metro, Tbilisi Bus Extension, Georgia). In some urban mobility projects, the EBRD was perceived as more accessible and willing to engage than local authorities, or as playing a constructive role in facilitating engagement between local authorities, clients and communities.

A number of positive practices only materialised after affected people activated independent accountability mechanisms. Problem-solving or mediation processes facilitated by these mechanisms sometimes created a more balanced environment for dialogue, ensuring equal participation of community and client representatives, although often without significant results (MHP, Ukraine). In one case (Oyu Tolgoi Copper-gold-silver Mine, Mongolia), an institutional platform comprising a tripartite council, initially established under a complaints resolution process, enabled strong community representation, although its influence eroded over time. Nonetheless, these mechanisms generally provided clearer channels for communities to raise concerns, receive information, and participate more equitably in discussions.

While these examples collectively illustrate elements of more constructive practice, such as a willingness to meet, share information or participate in facilitated dialogue, they remain the exception rather than the

norm. They highlight the types of engagement approaches that the EBRD should strengthen and apply more systematically to enhance meaningful public participation throughout the project life cycle.

Conclusions

Our analysis of 38 EBRD-financed projects across 15 countries reveals that public participation challenges are commonplace. Each project featured at least one concern across the following six categories of public participation: access to information, consultation, inclusion, grievance mechanisms, retaliation, and enabling conditions. Such patterns can also be explained by the fact that projects lacking transparency and timely information almost always have poor or superficial consultations, which in turn are strongly linked to the exclusion of vulnerable groups. Similarly, weak grievance mechanisms are associated with a higher risk of retaliation and intimidation against affected people and human rights defenders.

In 19 of the projects analysed, all of the following issues were identified: limited information on project risks and impacts, exclusion of rights holders from impact assessment and mitigation, reluctance to consider or incorporate their feedback, absence of public consultations before making key decisions, a lack of transparency in decision-making processes and timelines, and insufficient ongoing engagement by both the client and the EBRD throughout the project life cycle. These findings demonstrate that weaknesses in stakeholder engagement are not isolated incidents but rather recurring issues.

Furthermore, these patterns are consistent across sectors and project categories. Concerns occur in both category A (higher-risk) and category B (lower-risk) projects, indicating that public participation risks remain significant regardless of the overall environmental or social risk classification. Sectorally, the highest volume of issues is concentrated in food and agribusiness, natural resources, energy, and municipal infrastructure.

Notably, private sector projects exhibit the greatest number of participation concerns across all sectors, suggesting weaker accountability compared to public sector projects. Additionally, the majority of projects ultimately triggered accountability mechanisms, with 27 cases escalated to IPAM. This trend underscores just how often communities are forced to seek redress beyond project-level processes.

Across the analysed portfolio, local communities are the most frequently affected rights holders, appearing in over two-thirds of all projects. Human rights and environmental defenders, along with civil society organisations, are also repeatedly affected – mentioned in 9 of the 15 countries.

Geographically, the highest volume of identified participation concerns is concentrated in Uzbekistan, Bosnia and Herzegovina, Ukraine and Georgia. In many other countries in which the EBRD operates, no problematic projects were reported by civil society or registered with IPAM. However, the absence of reported issues in these countries – which may reflect restricted civic space, limited awareness of IPAM (since EBRD clients are not required to inform affected stakeholders), or fear of retaliation – should not be equated with an absence of problems.

Therefore, regular and effective monitoring of public participation practices at the project level, assessed within the specific country context, is crucial for determining whether these practices are realistic and truly meaningful.

Recommendations

The findings of this analysis confirm earlier concerns raised by Bankwatch,[14] reflected in IPAM annual reports documenting recurring complaints.[15] We and our civil society partners have previously proposed comprehensive recommendations for strengthening the EBRD's safeguards — including enhanced information disclosure, meaningful rights-holder engagement in project due diligence, and retaliation prevention[16] – some of which have been incorporated into the EBRD's revised good governance policies.[17]

Since the primary objective of this study was to demonstrate how systematic monitoring of stakeholder engagement at the project level can help identify recurring patterns in public participation practices and inform institutional learning and impact management, the following recommendations focus on establishing a monitoring and reporting framework for project-level public participation assessments:

- Introduce project-level monitoring of stakeholder engagement and public participation using a structured approach to ensure ongoing data collection and verification.
- Develop measurable indicators for meaningful civil society and citizen engagement and integrate them into the monitoring frameworks used by the EBRD and its clients.
- Ensure that these indicators reflect information accessibility, the inclusion of marginalised groups, the quality and depth of dialogue, influence on project decisions, the existence of a safe and enabling environment, the effectiveness of grievance mechanisms, and long-term participation outcomes, among other relevant factors.
- Consult with civil society organisations and communities on monitoring indicators and integrate their feedback.
- Standardise monitoring tools by introducing templates that require clients to report on engagement outcomes, including outreach aimed at vulnerable groups, the effectiveness of grievance redress mechanisms, anti-retaliation measures, and actions to support enabling environments.

[14] Nina Lesikhina, Key trends and shortcomings in community engagement on high-risk EBRD projects, *CEE Bankwatch Network*, 24 May 2024.

[15] Independent Project Accountability Mechanism, IPAM Annual Report 2024, *European Bank for Reconstruction and Development*, 2024.

[16] CEE Bankwatch Network, Civil society joint statement on the EBRD's draft safeguards, *CEE Bankwatch Network*, 24 May 2024.

[17] Nina Lesikhina, The EBRD has set new human rights standards: Will they improve the lives of millions?, *CEE Bankwatch Network*, 5 March 2025.

- Adopt an effective approach to verifying client-supplied information, including ongoing and meaningful engagement with affected rights holders and civil society organisations.
- Ensure disaggregated data collection (by gender, age, ethnicity, disability, etc.) to identify which groups are being excluded or adversely affected.
- Publish annual portfolio analyses summarising participation performance, lessons learned, and actions taken to strengthen project-level civic engagement across countries and sectors.
- Integrate public participation indicators into the EBRD's transition impact and governance scorecards.
- Track participation trends at project and country levels as a proxy for democratic governance and civic freedom to inform country partnership strategies.
- Use monitoring data to inform policy dialogue with governments on civic space, access to information, and inclusive decision-making.