

European Bank for Reconstruction and Development (EBRD)

Independent Project Accountability Mechanism (IPAM)

This profile was prepared using publicly available sources.

*The EBRD was established in 1991 to build market-oriented economies and promote private and entrepreneurial initiative in the new post-Cold War era in Central and Eastern Europe. It focused on banking system reform, price liberalization, privatization (legalization and policy dialogue), and the creation of appropriate legal frameworks for property rights. The EBRD is owned by 75 countries from five continents, as well as the European Union and the European Investment Bank. The Bank has invested more than €210 billion in over 7,400 projects.^{1 2} IPAM stands for **Independent Project Accountability Mechanism** and is the grievance mechanism of the EBRD. It deals with complaints about environmental, social and disclosure matters related to the Bank's investments. IPAM operates according to the provisions of the Project Accountability Policy (PAP),³ approved by the Board in 2019, and replaced the 2014 Project Compliance Mechanism Rules of Procedure.⁴ The 2019 PAP is currently under review.^{5 6}*

STANDARDS AND SAFEGUARDS

The EBRD relies on its **Environmental and Social Policy (ESP)**⁷ as the foundation for managing environmental and social risks. The ESP includes 10 Performance Requirements (PRs) tailored to the institution, though aligned with international best practices. These cover areas such as environmental and social risk management (PR1), labor (PR2), land acquisition and resettlement (PR5), Indigenous Peoples (PR7), and stakeholder engagement (PR10) among others. The ESP is part of a broader governance framework supported by the Access to Information Policy and the Independent Project Accountability Mechanism (IPAM), which together ensure transparency and grievance resolution.⁸

LAND TENURE

Land tenure rights and related grievances—including those concerning ownership, access, usage, eviction, or displacement—are explicitly within IPAM's scope under **Performance Requirement 5 (PR5)**.

¹ EBRD. n.d. History of the EBRD. <https://www.ebrd.com/home/who-we-are/ebrd-history.html>

² EBRD. n.d. Shareholders and Board of Governors. <https://www.ebrd.com/home/who-we-are/our-organisation/shareholders.html>

³ EBRD. 2019. Project Accountability Policy. https://www.ebrd.com/content/dam/ebrd_dxp/assets/pdfs/ipam/ipam-annual-report/ipam-pap/Project-Accountability-Policy.pdf

⁴ Earlier versions of the EBRD's accountability policy can be viewed at <https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism/our-policies.html#previous-accountability-policies>

⁵ EBRD. n.d. The Project Accountability Policy (PAP). <https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism/our-policies.html#customtab-5df121929c-item-6343f8bd6f-tab>

⁶ EBRD. n.d. EBRD Independent Project Accountability Mechanism. <https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism.html>

⁷ EBRD. 2024. Environmental and Social Policy 2024 https://www.ebrd.com/content/dam/ebrd_dxp/assets/pdfs/environment---sustainability/environmental-and-social-policy-esp/esp-2024/EBRD-Environmental-and-Social-Policy-2024-high-res.pdf

⁸ EBRD. 2024. Access to Information Policy. https://www.ebrd.com/content/dam/ebrd_dxp/assets/pdfs/access-to-information-policy/Access-to-Information-Policy-2024.pdf

PR5 applies to both formal and informal landholders and requires meaningful consultation, and protection against forced eviction. **Performance Requirement 7 (PR7)** further extends safeguards to Indigenous Peoples and vulnerable groups, recognizing collective and customary land rights and requiring Free, Prior, and Informed Consent (FPIC) where relevant.⁹ When land tenure rights are violated, PR5 mandates compensation at full replacement cost, resettlement support, livelihood restoration, and safeguards against forced eviction. For Indigenous Peoples, PR7 ensures respect for customary and collective land rights, with required FPIC and culturally appropriate engagement.

OUTREACH AND ADMISSIBILITY

IPAM's mandate includes outreach to internal and external stakeholders. It raises awareness through regular CSO meetings, EBRD Annual Meeting panels, and regional workshops with local partners to enhance community access. IPAM also collaborates with the IAMnet on trainings, publications, and external forums to promote accountability standards. Its user-friendly website provides detailed information, FAQs, guidance, and an online complaint tool.^{10 11}

To be admissible under the IPAM's Policy Complaints (called "Requests") can be submitted by individuals or civil society organizations (CSOs) who believe they are affected by an EBRD-financed project. In certain cases, unaffiliated CSOs may submit complaints, but these are considered only under the compliance function and assessed case by case. Complaints must relate to EBRD's non-compliance with its Environmental and Social Policy or Access to Information Policy, and must be filed within 24 months of the alleged harm.

Requests are inadmissible if they:

- Lack mandatory information,
- Fall outside IPAM's mandate (e.g., internal policy challenges, obligations of third parties/governments, repeat complaints without new evidence),
- Relate solely to issues of fraud, corruption, procurement, ethics, or contracts (referred elsewhere),
- Are clearly fraudulent, frivolous, malicious, or submitted for personal or competitive gain.

FILING A COMPLAINT

IPAM may proceed with a complaint even if the same issue is being addressed elsewhere; however, this is assessed on a case-by-case basis. It may decline to proceed if doing so would interfere with or duplicate other formal processes or risk prejudicing their outcomes.¹² For co-financed projects, IPAM notifies the accountability mechanisms of other institutions and encourages coordination. If similar complaints are filed with multiple mechanisms, IPAM may collaborate with them to enhance efficiency and avoid duplication. It may also share information with mechanisms operating in the same region, even if the project is not co-financed.¹³

⁹ EBRD. 2024. Environmental and Social Policy 2024

https://www.ebrd.com/content/dam/ebrd_dxp/assets/pdfs/environment---sustainability/environmental-and-social-policy-esp/esp-2024/EBRD-Environmental-and-Social-Policy-2024-high-res.pdf

¹⁰ EBRD. n.d. Outreach. <https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism/outreach.html#customtab-1df1658b8d-item-59580655cd-tab>

¹¹ EBRD. n.d. Submit a complaint <https://www.ebrd.com/home/forms/ipam-english.html>

¹² Paragraph 2.1 d). PAP 2019. EBRD. 2019. Project Accountability Policy.

https://www.ebrd.com/content/dam/ebrd_dxp/assets/pdfs/ipam/ipam-annual-report/ipam-pap/Project-Accountability-Policy.pdf

¹³ Paragraph 3.1 di). PAP 2019. EBRD. 2019. Project Accountability Policy .

https://www.ebrd.com/content/dam/ebrd_dxp/assets/pdfs/ipam/ipam-annual-report/ipam-pap/Project-Accountability-Policy.pdf .

Complainants are encouraged—but not required—to first attempt to resolve issues with the project client or Bank management, particularly in cases involving safety concerns, retaliation risks, or power imbalances.¹⁴ A Request can be submitted in any written format and in any official language of an EBRD country—via email, online form, mail, fax, in person, or through any EBRD Resident Office. Using the official submission form is optional; templates and guidance are available on the IPAM website. IPAM also offers support during the submission process.¹⁵ Requests must include the contact details of all complainants (and any representatives), written authorization if filed by a representative, a brief project description, details of the alleged harm, and any prior communication with the project or the EBRD.

IPAM has safeguards in place to protect complainants from retaliation. It allows for confidentiality upon request, is committed to preventing threats, harassment, or reprisals, and monitors for signs of retaliation throughout the process.^{16 17}

DESCRIPTION OF THE PROCESS

IPAM offers two pathways for addressing complaints: **Problem Solving** and **Compliance Review**.

Once a complaint is received, IPAM conducts a basic admissibility review and, if eligible, registers it within 10 business days. A 40-business-day assessment phase then begins, during which IPAM examines the issues and the willingness of the parties to engage. Based on its findings, IPAM decides whether to close the case or proceed to Problem Solving or Compliance Review. At the end of the assessment, IPAM issues an **Assessment Report** summarizing the outcome. If the parties agree to enter Problem Solving, the Assessment Report will include Terms of Reference outlining the scope, methods, timeline, required expertise, and guiding principles for the process—developed in consultation with the parties where possible.^{18 19}

The **Problem Solving** process is a voluntary, dialogue-based approach intended to address environmental, social, or public disclosure concerns. It begins with agreement among the parties on the process's scope, methods, and timeline, followed by a signed Framework Agreement setting out the ground rules and confidentiality terms. IPAM appoints a neutral expert—often a local dispute resolution specialist—to facilitate the dialogue in a fair and confidential manner. The process may involve joint or separate meetings, during which parties explore the issues and potential solutions using approaches tailored to the specific case. These may include facilitated dialogue, mediation, conciliation, information sharing, joint fact-finding, or supported negotiation. The Problem Solving process is expected to be

¹⁴ Paragraph 2.1 cv). PAP 2019. EBRD. 2019. Project Accountability Policy .

https://www.ebrd.com/content/dam/ebird_dxp/assets/pdfs/ipam/ipam-annual-report/ipam-pap/Project-Accountability-Policy.pdf

¹⁵ Paragraph 2.1 b). PAP 2019. EBRD. 2019. Project Accountability Policy .

https://www.ebrd.com/content/dam/ebird_dxp/assets/pdfs/ipam/ipam-annual-report/ipam-pap/Project-Accountability-Policy.pdf

¹⁶ Paragraph 2.1 c). PAP 2019. EBRD. 2019. Project Accountability Policy .

https://www.ebrd.com/content/dam/ebird_dxp/assets/pdfs/ipam/ipam-annual-report/ipam-pap/Project-Accountability-Policy.pdf

¹⁷ Paragraph 3.1 k). PAP 2019. EBRD. 2019. Project Accountability Policy .

https://www.ebrd.com/content/dam/ebird_dxp/assets/pdfs/ipam/ipam-annual-report/ipam-pap/Project-Accountability-Policy.pdf

¹⁸ Paragraph 2.3 a). PAP 2019. EBRD. 2019. Project Accountability Policy .

https://www.ebrd.com/content/dam/ebird_dxp/assets/pdfs/ipam/ipam-annual-report/ipam-pap/Project-Accountability-Policy.pdf

¹⁹ Paragraph 2.3 c). PAP 2019. EBRD. 2019. Project Accountability Policy .

https://www.ebrd.com/content/dam/ebird_dxp/assets/pdfs/ipam/ipam-annual-report/ipam-pap/Project-Accountability-Policy.pdf

completed within one year;²⁰ however, the timeline may be extended with the agreement of all parties and IPAM.²¹

If an agreement is reached, IPAM prepares a Problem Solving Report, or a summary if confidentiality applies. This is submitted to the EBRD Board and President and published on the Case Registry.²² If no agreement is reached, the complainant may request that the case be referred to IPAM's Compliance function for further consideration.²³ IPAM monitors the implementation of actions agreed upon by the parties until they are fully completed. The monitoring process may include consultations with complainants, the client, Bank staff, and other stakeholders; a review of project documentation; site visits; and expert engagement, if necessary. Monitoring Reports are published twice a year until all agreed actions have been completed.²⁴

The **Compliance review process** begins with a Compliance Assessment (lasting up to 60 business days) to determine whether there is evidence that the EBRD may have breached its Environmental and Social Policy (ESP) or Access to Information Policy (AIP). During this period, IPAM reviews relevant documents, consults involved parties, and considers responses from Bank management and the client. The outcome is a Compliance Assessment Report, which either recommends a full Compliance Review or closes the case.

If a Compliance Review is initiated, IPAM conducts a thorough investigation—lasting up to 140 business days—which may include site visits and input from technical experts. The findings are presented in a Compliance Review Report that outlines any policy breaches and includes recommendations. Based on these findings, the Bank develops a Management Action Plan (MAP) detailing corrective actions, timelines, and outcomes needed to bring the project into compliance. If non-compliance is confirmed, the Bank must take project-specific steps to correct the issues and address any actual or potential harm. Additionally, the Bank may be required to implement broader institutional changes—such as revising practices, procedures, guidance, or systems—to ensure ongoing and future compliance.²⁵

IPAM oversees the implementation of the MAP until all corrective actions are completed. The monitoring period is flexible and continues as long as necessary. During this time, IPAM consults with complainants, Bank staff, and other stakeholders; reviews documentation; and may conduct follow-up site visits. Monitoring Reports are published at least twice a year and monitoring concludes only when IPAM determines that all required actions have been successfully carried out.²⁶

IPAM ensures **transparent communication** by keeping complainants or their representatives informed about the status of their case. It also maintains a public Case Registry on its website, which provides up-to-date details on each registered complaint, including the project name, location, client, and date

²⁰ EBRD. n.d. About Problem Solving. <https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism/problem-solving.html>

²¹ EBRD. 2019. Project Accountability Policy . https://www.ebrd.com/content/dam/ebird_dxp/assets/pdfs/ipam/ipam-annual-report/ipam-pap/Project-Accountability-Policy.pdf

²² Paragraph 2.4. d. PAP 2019. EBRD. 2019. Project Accountability Policy . https://www.ebrd.com/content/dam/ebird_dxp/assets/pdfs/ipam/ipam-annual-report/ipam-pap/Project-Accountability-Policy.pdf

²³ Paragraph 2.4. e) iii. PAP 2019. EBRD. 2019. Project Accountability Policy . https://www.ebrd.com/content/dam/ebird_dxp/assets/pdfs/ipam/ipam-annual-report/ipam-pap/Project-Accountability-Policy.pdf

²⁴ EBRD. n. d. Problem Solving. https://www.ebrd.com/content/dam/ebird_dxp/assets/pdfs/ipam/promoting-access/IPAM-What-do-we-do-in-Problem-Solving.pdf

²⁵ EBRD. n.d. About Compliance. <https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism/compliance.html>

²⁶ EBRD. n.d. The Compliance Function. Enhancing transparency and accountability https://www.ebrd.com/content/dam/ebird_dxp/assets/pdfs/ipam/promoting-access/IPAM-What-do-we-do-in-compliance.pdf

received. If no confidentiality is requested, complainants' names are also listed. All case-related reports are published in the registry, with any redactions clearly noted if confidentiality applies.²⁷

²⁷ Paragraph 3.1. a) and b). PAP 2019. EBRD. 2019. Project Accountability Policy .
https://www.ebrd.com/content/dam/ebd_dxp/assets/pdfs/ipam/ipam-annual-report/ipam-pap/Project-Accountability-Policy.pdf