

Complaint Form

In order for the PCM to address your complaint, you must provide the following information:



Project
Complaint
Mechanism

Step 1: Details of the Complaint

1. Name of the Person(s) or Organisation(s) filing the Complaint ("the Complainant").

The Turkmenistan Working Group of the Civic Solidarity Platform

(comprised of the Centre for the Development of Democracy and Human Rights (Russia), Crude Accountability (USA), Freedom Files (Russia), and civic activists from inside Turkmenistan)

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2. Contact information of the Complainant (Please include address and, if possible, phone number and email address).

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3. Is there a representative making this Complaint on behalf of the Complainant?

Yes ☐ (if yes, please provide the Name and Contact information of the Representative):

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Please attach proof that the Representative has been authorised by the Complainant to file the Complaint. For example, this can be in the form of a letter signed by the Complainant giving permission to the Representative to make the Complaint on his behalf.

No ☒

Is proof of authorisation included with the Complaint?

Yes ☐ No ☒

4. Are you requesting that this Complaint be kept **confidential**?

Yes ☐ (if yes, please explain why you are requesting confidentiality)

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No ☒

5. Please provide the **name or a description of the EBRD Project** at issue.

This complaint is for the CMI Offshore project in Turkmenistan, which is currently pending final review, with a target Board date of October 18, 2017. Project number is 47096

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Please write on a separate sheet wherever needed.

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6. Please describe the **harm that has been caused or might be caused** by the Project *(please continue on a separate sheet if needed)*:

.....Please see Annex 1.
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Step 2: Problem-solving Initiative

7. If you are requesting the PCM's help through a **Problem-solving Initiative**, you must have made a genuine effort to contact the EBRD or Project Sponsor (Client) regarding the issues in this complaint.

a. Have you **contacted the EBRD** to try to resolve the harm caused or expected to be caused by the Project?

Yes ☐ **X** *(If yes, please list when the contact was made, how and with whom):*
Please See Annex 2.

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Please also describe any response you may have received.

.....Please see Annex 2.
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☐ **No** *(please go to question 8)*

Please provide a record of this contact with the EBRD, as instructed at the end of this form.

b. Have you **contacted the Project Sponsor** (Client) to try to resolve the harm caused or expected to be caused by the Project?

Yes ☐ *(if yes, please list when the contact was made, how and with whom)*

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Please also describe any response you may have received.

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No ☐ **X** *(please go to question 8)*

Please provide a record of this contact with the Project Sponsor (Client), as instructed at the end of this form.
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8. If you have not contacted the EBRD and/or Project Sponsor (Client) to try to resolve the harm or expected harm, please explain why.
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Step 3: Additional information

Although not required, it would be helpful to the PCM if you could also include the following information:

9. If you believe the EBRD may have failed to comply with its own policies, please describe which EBRD policies.

We believe that EBRD has failed to comply with its Environmental and Social Policy and has incorrectly categorized the project. It has failed to conduct an Environmental and Social Impact Assessment. As the project is **an associated facility of an oil extraction project**, and directly impacts an internationally protected area, it should be categorized as Category A and not B.

We believe that the EBRD has also violated its Turkmenistan Country Strategy, which excludes financing of the oil and gas sector due to the country's failure to meet key governance and economic benchmarks as articulated in Article 1 and in the country strategy itself.

10. Please describe any other complaints you may have made to try to address the issue(s) at question (for example, court cases or complaints to other bodies).

...N/A.....

11. Are you seeking a Compliance Review where the PCM would determine whether the EBRD has failed to comply with a Relevant EBRD Policy in respect of an approved Project? **Yes X** **No** ☐

12. Are you seeking a Problem-solving Initiative which has the objective of restoring a dialogue between you and the Project Sponsor (Client) to resolve the issue(s) underlying your Complaint without attributing blame or fault? **Yes** ☐ **No XXX**

13. What results do you hope to achieve by submitting this Complaint to the PCM?

Crude accountability hopes that the Board decision for this project is delayed until it is re-categorized as a Category A and an Environmental and Social Impact Assessment is carried out.

Further, we hope that the PCM will undertake a compliance review of this project with respect to the Turkmenistan Country Strategy.

Date:

Supporting documents

If possible, please provide the following supporting documents by email to pcm@ebrd.com:

Please write on a separate sheet wherever needed.

- Proof that the Representative has been authorised by the Complainant to file the Complaint. For example, this can be in the form of a letter signed by the Complainant giving permission to the Representative to make the Complaint on his behalf.
- A written record of your correspondence with the EBRD in regards to this problem (these may be letters, emails or other form of correspondence and communication).
- A written record of your correspondence with the Project Sponsor (Client) in regards to this problem (these may be letters, emails or other form of correspondence and communication).

Please send your Complaint by fax, post, or email to:

**Project Complaint Mechanism
Attn: PCM Officer
European Bank for Reconstruction and
Development
One Exchange Square
London EC2A 2JN
Fax: +44 20 7338 7633
E-mail: pcm@ebrd.com**

Alternatively, a Complaint may be delivered by post or hand, at any one of the [EBRD Resident Offices](#) in the countries of operations. Please mark these "For the attention of the Project Complaint Mechanism Officer". , indicating that it is for transmission to the PCM. Complaints may be sent using the Complaint [online form](#), available at: http://www.ebrd.com/eform/pcm/complaint_form