

# COMPLAINTS MECHANISM

2024 ANNUAL REPORT



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## **2024 ANNUAL REPORT**

## **Complaints Mechanism 2024 annual report**

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Our cordial thanks go to all of them for their support.

For further information on the EIB's activities, please consult our website, [www.eib.org](http://www.eib.org).  
You can also contact [info@eib.org](mailto:info@eib.org). Get our e-newsletter at [www.eib.org/sign-up](http://www.eib.org/sign-up).

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**THE COMPLAINTS MECHANISM REPORT 2024** highlights the key achievements of the Complaints Mechanism of the European Investment Bank (EIB) Group<sup>1</sup> over the past year in addressing concerns from the public about the EIB Group's projects and activities.

This year, we – as the Complaints Mechanism – handled a high number of cases, increased our efficiency, strengthened our monitoring function and ensured that the voices of individuals and communities affected by EIB-financed projects were heard.

A major milestone was the launch of an external review of the Complaints Mechanism. This review by a panel of independent experts assesses how we deliver on our mandate and will help determine whether we review our current policy adopted in 2018.

Throughout the year, we visited numerous sites and held in-person meetings with complainants, promoters and other key stakeholders across various countries. We also started monitoring visits for selected compliance cases, marking an important step in our commitment to enhanced transparency.

In addition, we organised several outreach events to raise awareness about our mandate and the importance of accountability in the projects we support.

This report is structured to provide a comprehensive overview of our activities, including complaints investigation, dispute resolution, and monitoring functions. We hope that the report offers a clear understanding of how we are ensuring that the EIB Group remains accountable and responsive to the public.

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<sup>1</sup> The EIB Group comprises the EIB and the European Investment Fund (EIF). For more information about the EIB, [visit the EIB website](#). The EIF provides risk finance for small and medium businesses. For more information about the EIF, [visit the EIF website](#).



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“ The Complaints Mechanism contributes significantly to upholding the EIB Group’s commitment to social and environmental responsibility by independently investigating the concerns raised by citizens, solving disputes and providing recommendations for improvement. ”

Monique Koning, Inspector General



“ In 2024, the Complaints Mechanism preserved the EIB Group’s environmental and social standards in diverse sectors, such as transport, water and construction, while reinforcing the Bank’s commitment to transparency and accountability to people and communities in Europe and beyond. ”

Vasco Amaral Cunha, Head of the Complaints Mechanism, in office since 1 January 2024.

# 2024 HIGHLIGHTS

**80 cases closed**

+33% from 2023

**11 dispute resolution processes handled**

**25% fewer outstanding cases**

compared with 2023

**18 cases**

got recommendations and/or suggestions for improvement

**External review**

of the Complaints Mechanism launched

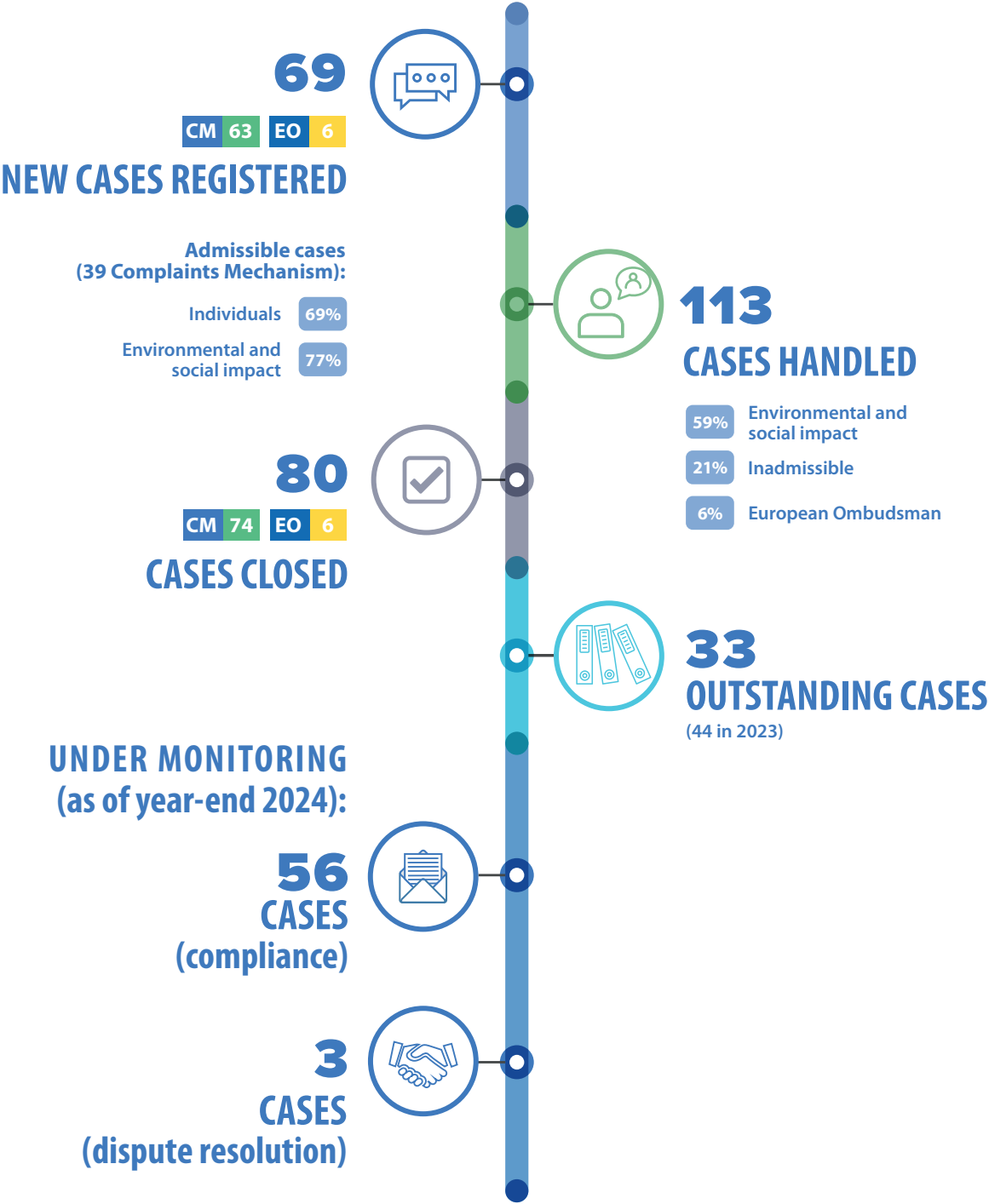
**Monitoring visits introduced**

for selected compliance cases

**Outreach event**

held in Nairobi for civil society organisations in East Africa

# 2024 CASES AT A GLANCE



CM: Complaints Mechanism EO: European Ombudsman

# ABOUT THE EIB GROUP COMPLAINTS MECHANISM

The Complaints Mechanism is the citizen-driven accountability tool of the European Investment Bank Group.<sup>2</sup> It offers a platform for individuals, communities and civil society organisations to raise their concerns about the EIB Group's projects and activities, enabling them to exercise their rights to complain and be heard. The Complaints Mechanism operates transparently and independently.

## OUR MISSION

**Our mission is to centrally handle all external complaints about alleged maladministration<sup>3</sup> by the EIB Group, as defined in the EIB Group Complaints Mechanism Policy, in an objective way.<sup>4</sup>** By addressing people's concerns, the Complaints Mechanism demonstrates that the EIB Group is an accountable institution that strives to deliver fair and sustainable results for everyone. It also shows that the Group remains active in improving the way it operates and fulfils its mission.

We also deal with complaints against the EIB Group lodged with the European Ombudsman<sup>5</sup> and all other non-judicial complaints lodged with international institutions or bodies which (directly or indirectly) concern the Group.

**We handle complaints about various topics concerning operations financed by the EIB Group.** Examples include a potential lack of consultation with a local population, environmental degradation, involuntary resettlement and related compensation matters, and threats to community health and safety. We also support complainants who encounter other issues concerning EIB Group activities, such as difficulties in accessing information or specific documents.

Based on the number of cases handled and problems resolved, the EIB Group Complaints Mechanism is the leading accountability mechanism established by international financial institutions.

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2 For more information, visit the [EIB Group Complaints Mechanism's website](#).

3 Maladministration occurs when the EIB Group fails to act in accordance with a rule or principle that is binding upon it, including its own policies, standards and procedures, fails to comply with human rights, with applicable law, or with the principles of good administration. Examples of maladministration include administrative irregularities, unlawful discrimination, unjustified refusals of information, abuse of power, unnecessary delays and a failure by the EIB Group to comply with its own obligations in the appraisal and monitoring of projects financed by the EIB Group. Maladministration may also relate to the environmental or social impact of EIB Group activities and to project cycle-related policies and other applicable policies of the EIB.

4 For more information, see the [Complaints Mechanism Policy](#).

5 For more information, visit the [European Ombudsman's website](#).



## OUR PLACE IN THE EIB GROUP

The [EIB Group is accountable](#) for its decisions, actions and/or omissions, and the Complaints Mechanism is the Group's public accountability tool, performing its duties with full independence from the operations of the EIB and the EIF. **It is one of three independent accountability functions under the EIB Inspectorate General**; the other functions are Investigations and Evaluation.

**The operational independence, impartiality and effectiveness of the Complaints Mechanism are key for its functioning and are ensured by our reporting structure.** The Head of the Complaints Mechanism is responsible for the management, development, implementation and monitoring of the mechanism. Under the Complaints Mechanism Policy, the Head of the Complaints Mechanism decides on the admissibility of complaints, the type of collaborative resolution process and/or investigation needed for a particular complaint, and the final version of Complaints Mechanism reports. All staff working for or supervising the Complaints Mechanism are expected to apply and uphold specific rules of conduct.

Given the EIB's activities beyond Europe, the Complaints Mechanism also supports EIB Global<sup>6</sup> in its accountability efforts.

## OUR ROLE IN THE EUROPEAN UNION

**As EU bodies, the EIB and its subsidiary, the EIF, are committed to ensuring good administration and maintaining the highest level of accountability to the public**, especially project-affected person(s), that is, person(s) affected by projects in which the EIB Group is involved. The EIB Group is accountable to EU Member States as shareholders and policy setters, to investors who buy the bonds that the Group issues, to the Group's project promoters and beneficiaries, and to the project-affected person(s).

**We cooperate with [the European Ombudsman](#)**, which can review the decisions made by EIB Group entities. Any member of the public can access this two-tier procedure: the EIB Complaints Mechanism as an initial step and the European Ombudsman as a further possible step.<sup>7</sup> This ensures an extra level of independence and accountability, making the Complaints Mechanism unique among independent accountability mechanisms of international financial institutions.

## THE ADDED VALUE OF THE COMPLAINTS MECHANISM

The Complaints Mechanism:

- enables people affected by the EIB Group's activities and any interested individual or organisation to **seek and receive a response to their concerns about maladministration of the EIB Group**;
- enables **the Bank to be held to account for its decisions, actions and/or omissions** by querying these and requesting a response;
- **provides an impartial process for addressing disputes**, which ensures fair resolutions for parties involved in EIB-financed projects;
- **provides institutional learning** related to the issues investigated and detects potential systemic shortcomings.

<sup>6</sup> [EIB Global](#) is the arm of the EIB responsible for activities beyond the European Union, and focuses on fostering sustainable and inclusive societies worldwide.

<sup>7</sup> The European Ombudsman expressed its intention to withdraw from the memorandum of understanding (MoU) signed in 2008 between the European Ombudsman and the EIB. In their [letter on 7 December 2023](#), the European Ombudsman informed the EIB that: (i) the purpose behind the MoU has largely been achieved, (ii) its terms no longer reflect the European Ombudsman's practices, and (iii) the European Ombudsman will continue dealing with complaints from beyond the European Union. This decision does not affect the two-tier procedure, and the European Ombudsman will continue investigating complaints from non-EU complainants if there are grounds to do so.

## OUR APPROACH

**We listen to people's concerns** about EIB Group projects or activities, and we enable them to exercise their rights to complain and be heard. We operate as a non-judicial, solution-driven mechanism, based on the principles of independence and transparency.

Our role is to **investigate complaints** to ensure that the EIB Group complies with its policies and procedures, and **to propose corrective actions** if appropriate.

**We also facilitate the pre-emptive resolution of disputes between complainants, the EIB Group, and borrowers/promoters of its financed operations.** In addition, we help the EIB Group achieve good administration by advising on possible improvements to activities.

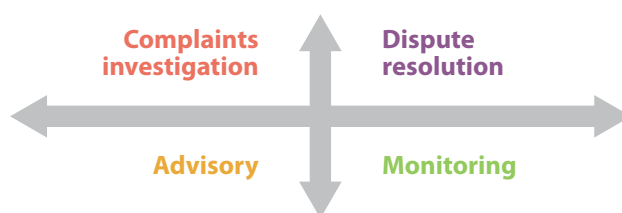
**Our reports** are usually publicly available – unless a complainant requests confidentiality – and provide information on the way the EIB Group operates and implements its policies.



## OUR CORE FUNCTIONS

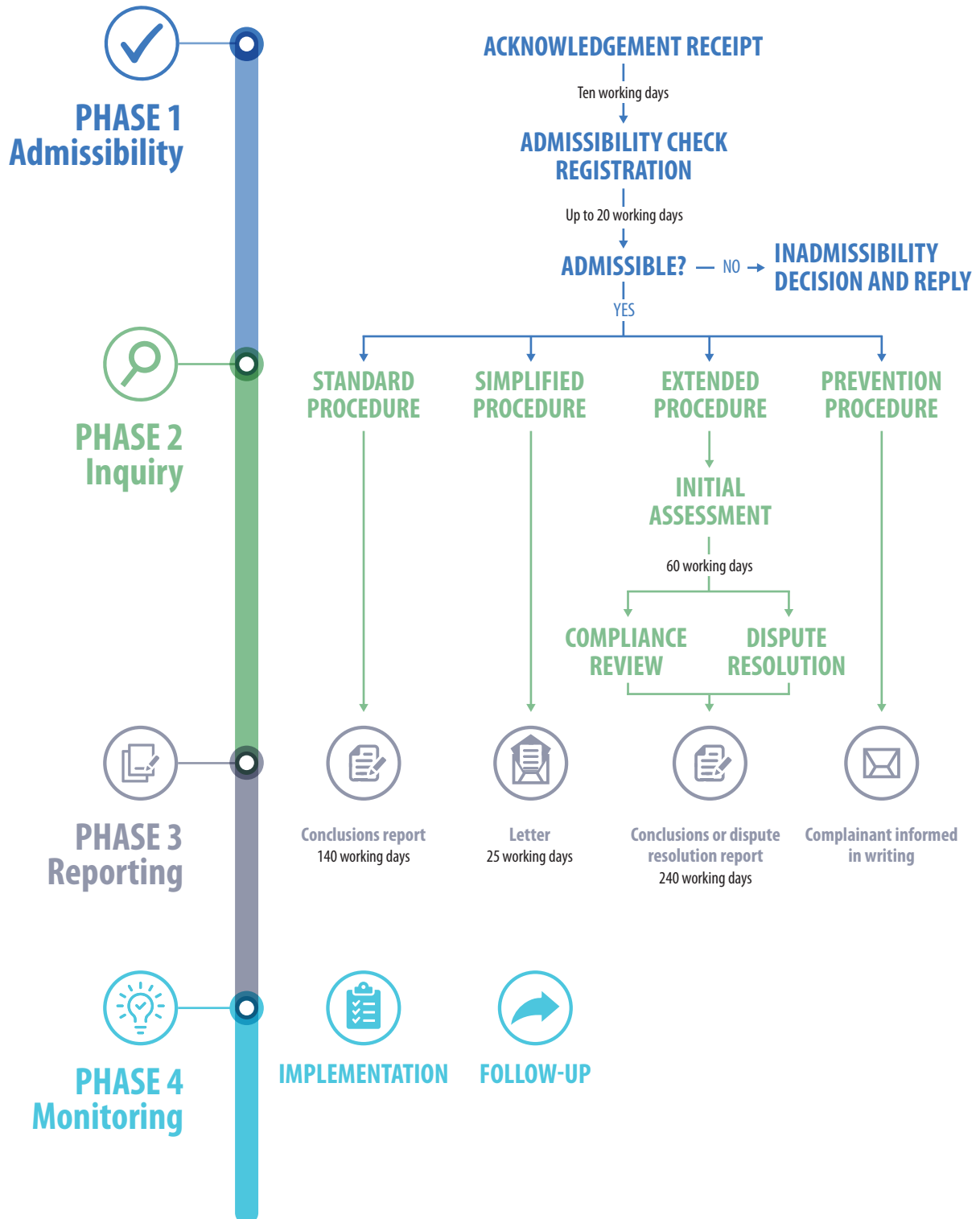
The Complaints Mechanism has four functions:

- **Investigate complaints** against the EIB Group.
- **Facilitate dispute resolution processes**<sup>8</sup> between the complainant(s) and the project promoter(s) with the participation of national authorities and/or the relevant EIB Group services wherever appropriate.
- **Advise senior management** on issues directly or indirectly linked to cases handled, based on potential areas for improvement detected in the complaints-handling process.
- **Monitor** the implementation of agreed corrective actions and recommendations for closed complaints, including agreements reached through mediation, as well as the EIB Group's response to its advisory initiatives.



<sup>8</sup> For more details, see [the dispute resolution work of the Complaints Mechanism on the EIB website](#).

**Figure 1:** How we handle complaints



## HOW WE HANDLE COMPLAINTS

The complaints-handling process starts with the **admissibility of a complaint**. This phase involves assessing whether a complaint received from an individual or an organisation falls under the mandate of the Complaints Mechanism. Complaints are usually lodged by letter, fax, email or our online [complaints form](#).<sup>9</sup>

After determining the admissibility of a complaint, the Complaints Mechanism carries out a **preliminary review** of the allegations, which involves desk reviews and meetings with EIB Group services and external stakeholders (on-site, if necessary). After gathering the required information, we decide whether further assessment is needed. Complex cases follow an extended procedure with a longer time frame for response. In these cases, the preliminary review is performed during an initial assessment phase, which closes with an initial assessment report setting out the appropriate approach for handling the complaint. This approach may involve a compliance review or a collaborative resolution process.

During a **compliance review**, we investigate whether the EIB Group has followed the standards, rules and procedures that govern its operations.<sup>10</sup>

Alternatively, complainants may be offered the opportunity to resolve the issues underlying their complaint through a **dispute resolution** process, if all relevant stakeholders agree. This process may involve information sharing, dialogue, negotiation, joint fact-finding, and/or formal mediation. If the parties agree to certain actions and commitments during the collaborative resolution process, these are generally documented with the arranged timetable in a written agreement.

**Reporting** occurs once the analysis of the complaint is completed. We present the findings, conclusions and any recommendations in a conclusions report (compliance review), a dispute resolution report (dispute resolution), or a letter (simplified procedure).

We also perform **monitoring** work to ensure any follow-up measures required are adequately implemented by the EIB Group and/or project promoter.

## OUR TEAM

**Our staff members' diversity and variety of backgrounds – as well as their commitment to accountability – are our most valuable assets.** The team, which comprises members of ten different nationalities and covers 21 languages (as of the end of 2024), has professional experience in law, the environment, human rights, governance, economics, project operations, human resources, standards of the EIB Group and of international financial institutions, and communication.

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<sup>9</sup> The [form](#) is available in many languages on the EIB website.

<sup>10</sup> These include the Bank's [Environmental and Social Standards](#).



The Complaints Mechanism team in Luxembourg in April 2025.

## OUR COLLABORATION WITH THE GLOBAL ACCOUNTABILITY NETWORK

**The Complaints Mechanism is a longstanding member of the Independent Accountability Mechanisms Network (IAMnet), which represents the accountability mechanisms of several international financial institutions. The Complaints Mechanism has benefited from, and contributed to, the lessons learned and shared within this group.**

The IAMnet currently comprises 23 members who cooperate and exchange information, including on complaints and concerns related to co-financed projects. We organise joint outreach activities<sup>11</sup> and participate in working groups dealing with topics of common interest, such as reprisals or dispute resolution.

While IAMnet members share a common mission to assess complaints and respond to concerns independently, they function differently. For example, two distinct features of the EIB Group Complaints Mechanism are that (i) complainants do not have to indicate the relevant rule or policy that may have been breached, and (ii) complainants may simply refer to a negative environmental and social impact of EIB Group-financed operations. Moreover, complainants do not have to prove they are directly affected by the issue reported to the Complaints Mechanism. As mentioned earlier, another distinct feature of the Complaints Mechanism is the two-tier procedure with the European Ombudsman, which can review the decisions made by EIB Group entities.

<sup>11</sup> For more details about joint outreach activities in 2024, please consult the section titled "[Outreach and other activities](#)."

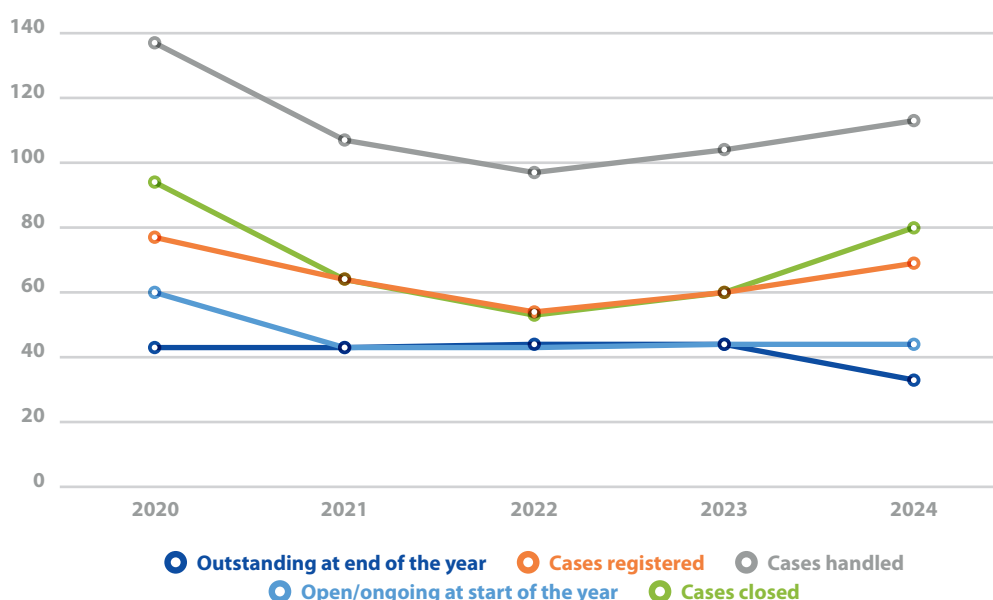
# OUR RESULTS IN 2024

## GENERAL OVERVIEW

In 2024, we dealt with many cases and strengthened our monitoring function. We handled 113 cases, including coordinating seven European Ombudsman cases, and closed 80<sup>12</sup> of them. This led to a 25% reduction in the number of open cases at year-end – 33 in 2024 vs. 44 in 2023. Most of these open cases were registered within the year (63%).<sup>13</sup> A highlight of 2024 was the launch of an external review of the Complaints Mechanism, led by a panel of independent experts.

The number of new cases registered increased to 69 in 2024 from 60 in 2023. Of the 63 new complaints submitted directly to the Complaints Mechanism in 2024,<sup>14</sup> 39 were registered as admissible. Most of these new admissible complaints (77% in 2024) concerned the environmental and social impact<sup>15</sup> of EIB-financed projects.

**Figure 2:** Number of complaints received, handled and closed by the Complaints Mechanism since 2020



<sup>12</sup> 23 of these cases were related to the Zenata Urban Development project.

<sup>13</sup> Cases submitted directly to the Complaints Mechanism.

<sup>14</sup> Six of the 69 new complaints in 2024 were complaints about EIB Group activities or operations that were lodged with the European Ombudsman. As the Complaints Mechanism coordinates the Bank's response to such complaints, they are included in its caseload.

<sup>15</sup> These are the so-called "E" complaints. Each complaint category has a corresponding code.

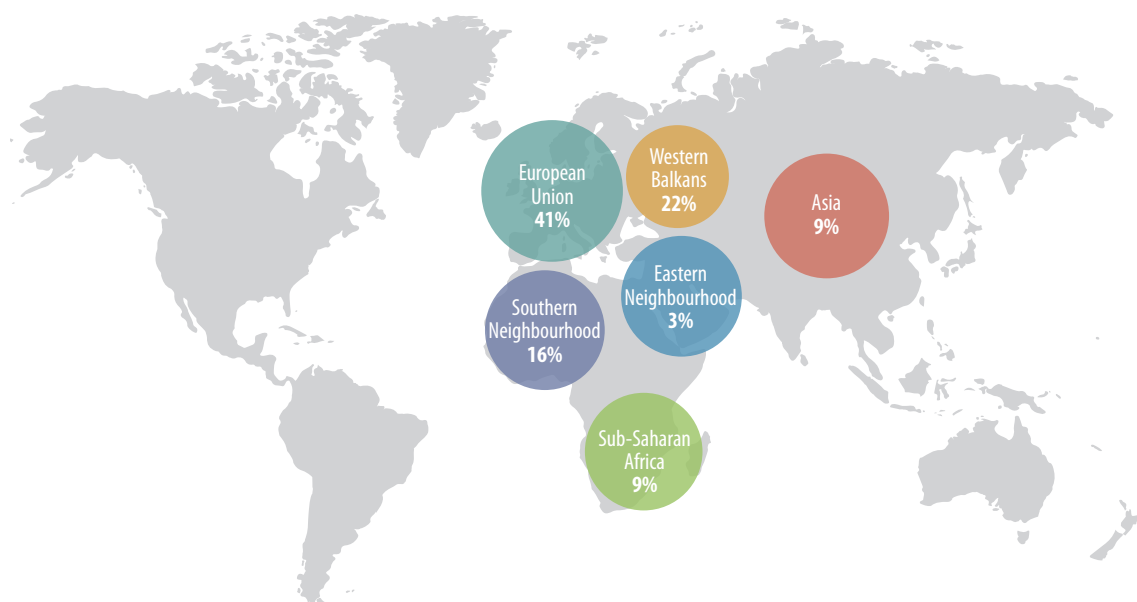


Most complaints submitted directly to the Complaints Mechanism concern EIB activities. In 2024, we received and closed two complaints related to EIF activities (for more details, see the section titled [“Review of cases related to EIF activities”](#)).

As in previous years, complaints received in 2024 were submitted primarily by individuals (69%), followed by civil society organisations (26%), with both groups focusing their allegations on the environmental and social impact of EIB-financed projects.

New admissible complaints were predominantly related to EIB-financed projects (32 out of 39), and most of these project-related complaints concerned projects beyond the European Union (59%).

**Figure 3:** Regional distribution of new admissible cases related to EIB-financed projects



Transport was the dominant sector for new admissible project-related complaints (28%), followed by construction and mining<sup>16</sup> (22% each), and then energy (13%).

During 2024, we monitored the implementation of action points for numerous compliance cases (68 in total), adding new cases to our monitoring registry and closing the monitoring process for some cases, leaving 56 compliance cases under monitoring at year-end. We also monitored four dispute resolution agreements in 2024. Further details about our monitoring can be found in the section titled [“Monitoring function”](#).

We carried out several site missions in 2024 and met in person with complainants, promoters and other key stakeholders in Georgia, India, Morocco, Nepal, Serbia, Sri Lanka and Tunisia. We also started monitoring visits for selected compliance cases (where we had identified major non-compliances), marking a significant step in enhancing the transparency of our monitoring. Our first monitoring reports of compliance cases should be published in the first quarter of 2025.

Furthermore, we organised several online and in-person events in 2024. These included a productive outreach event in Nairobi, Kenya in June 2024 involving representatives from 31 civil society organisations across seven East African countries, and our annual meeting with civil society organisations in Luxembourg in October 2024. In addition, we participated in outreach events in Washington and

<sup>16</sup> All complaints in the mining sector were about the Zero Carbon Lithium project in Germany.

Manila. We also continued to raise awareness within the EIB about our mandate and our work. For more details, please see the section titled "[Outreach and other activities](#)."

In line with the semi-annual reporting requirement of the Complaints Mechanism Policy, we reported to the EIB Board of Directors in March and September 2024 and to the EIF Board of Directors and the EIF Audit Board in February and September 2024. We also reported quarterly on our activities, particularly on the outcomes of closed cases, to the EIB Management Committee, the EIB Audit Committee and the EIF Chief Executive.

The Inspector General launched an external review of the Complaints Mechanism in March 2024, led by a panel of independent experts. The experts reviewed (i) the Complaints Mechanism's current [Policy](#) and [Procedures](#), (ii) selected compliance and dispute resolution cases, (iii) various activity reporting and publications, (iv) our monitoring activity, and (v) other relevant documents and studies. In addition, the experts held interviews and meetings with internal and external stakeholders, including the European Ombudsman and civil society organisations, further carrying out a benchmarking exercise to compare the Complaints Mechanism's activities and work with those of independent accountability mechanisms of other international financial institutions. The external review of the Complaints Mechanism is assessing how we deliver on our mandate, considering our policy and international best practices. At the end of 2024, the results of the external review were pending, and they will inform the decision on whether our current policy (from 2018) will be reviewed.

For more details about our case-handling work in 2024, please consult [Annex I](#).

## COMPLAINTS INVESTIGATION FUNCTION

**In 2024, the Complaints Mechanism completed investigation and compliance reviews for 34 cases spanning various areas, countries and issues.<sup>17</sup>**

We **closed several challenging cases from 2021 and 2022**, including the South Regional Water Board Water Supply and Sanitation Programme (Malawi); the Barrage Réservoir de Lom Pangar and Nachtigal Hydropower Plant (Cameroon);<sup>18</sup> and the Pune Metro Rail project (India), which involved diverse allegations and different groups of affected people, leading us to proceed in parallel with a compliance review and four dispute resolution processes.

Cases related to the **Zenata Urban Development project** in Morocco were also among those we handled and closed in 2024. This project covers the development of a new eco-city and involves the resettlement of more than 40 000 people. We closed 19 cases<sup>19</sup> related to this project, and were still handling five cases at the end of 2024: one through dispute resolution and four through compliance. Three of the cases under compliance review contain allegations about the resettlement of industrial and informal business activities.

**Some projects** triggered different cases for us in 2024. For example, we received two complaints with different allegations from the same individual regarding the Poklečani Wind Farm project (Bosnia and Herzegovina), alleging breaches of several EIB Environmental and Social Standards (including those

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<sup>17</sup> More than half of these cases are related to the Zenata Urban Development project. For five of the cases, we undertook a full compliance review. The other Zenata cases were dealt with in a simplified way because most of them contained similar allegations to those covered in the existing conclusion reports and thus we could use the results of the previous full compliance reviews. In our final reply for each case, we analysed the situation of the complainant and often referred to recommendations that we had already issued to the Bank and that we were still monitoring. Some other cases were dealt with through the simplified procedure, such as cases related to own governance and human resources.

<sup>18</sup> This investigation began only after the dispute resolution process (initiated in 2022) concluded in February 2024.

<sup>19</sup> In addition to these cases, four inadmissible cases related to this project were closed.



related to environmental and social impact, stakeholder engagement, and biodiversity). We also received several complaints related to Corridor Vc Medakovo – Poprikuse (Bosnia and Herzegovina).

We made significant progress in handling other cases, such as the Bolivia Mi Agua Water and Sanitation project (Bolivia), Flood Protection Measures (Greece – Rafina), Metro de Madrid Line 11 Extension (Spain), and an access to information case about the EIB's failure to disclose project summaries for seven projects in a timely manner. We expect to close all these cases in 2025, including the latter case in the first quarter of the year.

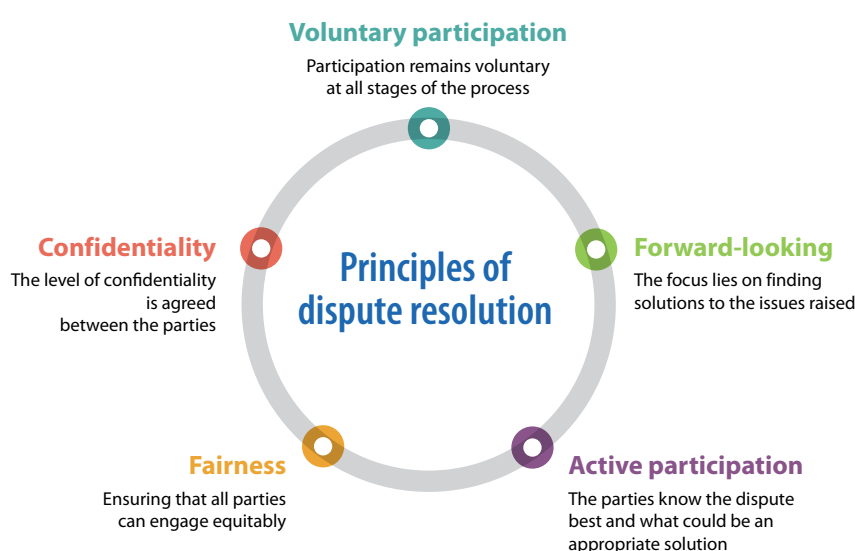
Further details about specific cases handled through compliance are available in the section titled ["Review of selected cases related to EIB activities."](#)

## DISPUTE RESOLUTION FUNCTION

**In 2024, we dealt with an increasing number of cases through dispute resolution. We handled 11 dispute resolution processes from 11 cases and closed five of them. We also analysed 11 new cases for dispute resolution potential.**

The dispute resolution team of the Complaints Mechanism analyses the potential to solve complaints amicably through a dispute resolution process. If such potential is identified and the parties agree, the team designs and implements a collaborative resolution process as an alternative to a compliance review. Whenever possible, and depending on the type of complaint, the team attempts to resolve the dispute by achieving a better and common understanding of the issues for the parties involved, improving the degree of trust between the parties and identifying mutually acceptable solutions.<sup>20</sup>

**Figure 4:** Principles of dispute resolution



The dispute resolution team tailors a facilitative approach for each dispute, using options such as information sharing, dialogue, negotiation, joint fact-finding, and formal mediation.

While maintaining its independence and impartiality, the dispute resolution team works closely with

<sup>20</sup> Read online: [About the dispute resolution work of the Complaints Mechanism of the EIB Group.](#)

colleagues in the complaints investigation function during the initial assessment phase. In two cases,<sup>21</sup> this close collaboration led to an early resolution of the respective complaints and the closing of these cases during the initial assessment phase.

## 11 DISPUTE RESOLUTION PROCESSES HANDLED

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- (3) Tanahu Hydropower project (Nepal)
- (1) Appui au secteur de l'eau potable (a project to secure drinking water supply in Greater Tunis) (Tunisia)
- (1) Algeti-Sadakhlo Road (Georgia)
- (1) Barrage Réservoir de Lom Pangar project and Nachtigal Hydropower Plant project (Cameroon)
- (1) Corridor Vc Medakovo – Poprikuse (Bosnia and Herzegovina)
- (1) Greater Colombo Wastewater project (Sri Lanka)
- (1) Pune Metro Rail project (India)
- (1) Railway Niš Dimitrovgrad (Serbia)
- (1) Zenata Urban Development project (Morocco)

## 5 DISPUTE RESOLUTION PROCESSES CLOSED

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- (2) Tanahu Hydropower project (Nepal)<sup>22</sup>
- (1) Appui au secteur de l'eau potable (Tunisia)
- (1) Barrage Réservoir de Lom Pangar project and Nachtigal Hydropower Plant project (Cameroon)<sup>23</sup>
- (1) Pune Metro Rail project (India)

For more details about specific cases handled through dispute resolution, please consult the section titled [“Review of selected cases related to EIB activities.”](#)

## MONITORING FUNCTION

**In 2024, we monitored 68 compliance cases and four agreements for dispute resolution processes.**

The Complaints Mechanism monitors the recommendations and suggestions for improvement (called “action points”) issued in its conclusions reports. It also monitors the implementation of actions agreed by the parties in dispute resolution processes.

### Compliance cases

In 2024, **we monitored** the implementation of action points for **68** cases (cases for which the implementation of at least one action point remained open). During the year, we added **18** new cases to our monitoring registry and closed the monitoring process for **12** cases. At the end of 2024, **56** cases remained **under monitoring**.<sup>24</sup>

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21 [SG/E/2023/17](#) Malawi M1 Road Rehabilitation and [SG/E/2024/07](#) Malawi NRW Water Efficiency project.

22 These two cases ([SG/E/2021/10](#) and [SG/E/2021/11](#)) were handed over to compliance in August 2024.

23 This case ([SG/E/2022/16](#)) was handed over to compliance in February 2024.

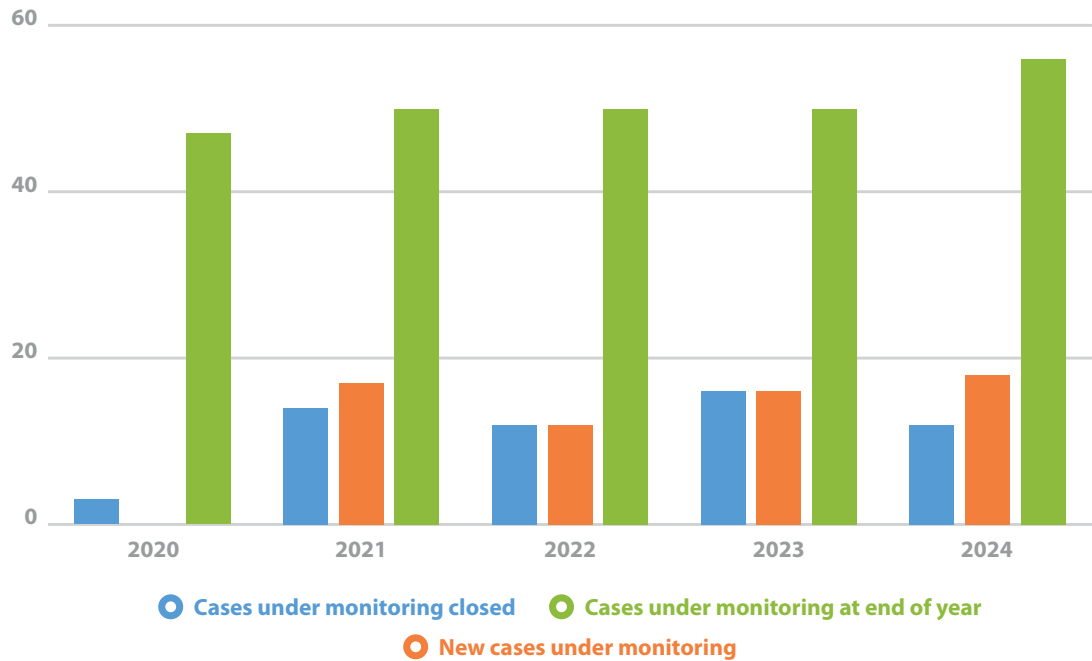
24 The webpage of a specific case provides information about the case and the timeline of the handling process and indicates whether the case is subject to monitoring, and if so, the status of the monitoring process (open/closed and date of closure).

Our monitoring tool enables a systematic approach to tracking the implementation of our action points, mainly with the EIB services. Since its launch at the end of 2020, we have closed the monitoring of **57** compliance cases.

In 2024, we enhanced the information available to the public about our monitoring. We now provide more information about the monitoring status on the webpage of the cases under monitoring, and include details of the measures taken in implementing each action point. We started updating our website in 2024 for closed monitored cases and we will continue enhancing the transparency of our monitoring for an increasing number of cases.

We also started conducting site visits in 2024 for the monitoring of selected compliance cases with significant issues. We conducted two monitoring visits, one for the Nepal Power System Expansion project and one for the Zenata Urban Development project. We expect to publish our first monitoring reports for these compliance cases in the first quarter of 2025.

**Figure 5:** Compliance cases under monitoring at the end of the year between 2020 and 2024



Further details about selected compliance cases with closed monitoring and still under monitoring in 2024 are available in the section titled [“Review of selected cases related to EIB activities”](#).

**Dispute resolution cases**

In 2024, we **monitored the implementation of agreements for four dispute resolution processes:** SG/E/2021/16A Malawi Northern Region Water Board Water Efficiency Project, SG/E/2021/09 B1 and SG/E/2021/09 B2 Pune Metro Rail project, and SG/E/2022/06 Bangalore Metro Rail project – Line 6. All these agreements were still being monitored at the end of the year.

## EUROPEAN OMBUDSMAN AND OTHER NON-JUDICIAL REVIEW MECHANISMS

### General overview

The Complaints Mechanism deals with complaints against the EIB Group lodged with the European Ombudsman, playing a coordinating role in this process. In 2024, we coordinated the handling of seven complaints to the European Ombudsman against the EIB Group and six of them were closed. For all the closed cases, the European Ombudsman did not find any maladministration by the EIB Group.

In 2024, we registered six new complaints (same as 2023) against EIB Group activities and operations lodged with the European Ombudsman. None of these complaints had previously been handled by the Complaints Mechanism before being escalated to the European Ombudsman (two in 2023). The new complaints were all related to the EIB's own governance (two in 2023).

The European Ombudsman closed six cases against the EIB in 2024 (same as 2023), reaching the following conclusions:

CASE CLOSED	OUTCOME
A case concerning the EIB's alleged lack of procedure for recognising a staff member as a disabled person. <sup>25</sup>	<b>Closed without further action</b>
A case concerning a failure to reply to a complaint lodged with the Complaints Mechanism about a wind farm in Bosnia and Herzegovina. <sup>26</sup>	<b>Settled</b>
A case concerning a failure to reply to a complaint lodged with the Complaints Mechanism about a wind farm in Bosnia and Herzegovina. <sup>27</sup>	<b>Settled</b>
A case concerning a failure to reply to a complaint lodged with the Complaints Mechanism about a job application. <sup>28</sup>	<b>Settled</b>
A case regarding the EIB's failure to reply to concerns about how it deals with Israeli counterparts. <sup>29</sup>	<b>Settled</b>
A case concerning the EIB's failure to reply to a request about the handling of allowances following divorce. <sup>30</sup>	<b>Settled</b>

In addition to coordinating the seven cases, we followed up and collaborated with the relevant EIB services on a suggestion for improvement made by the European Ombudsman regarding the proactive disclosure of Environmental and Social Data Sheets by the EIB prior to its Board's approval of loans.<sup>31</sup>

<sup>25</sup> [EO/802/2023/PB](#).

<sup>26</sup> [EO/347/2024/EM/FTR](#).

<sup>27</sup> [EO/1111/2024/EM/FTR](#).

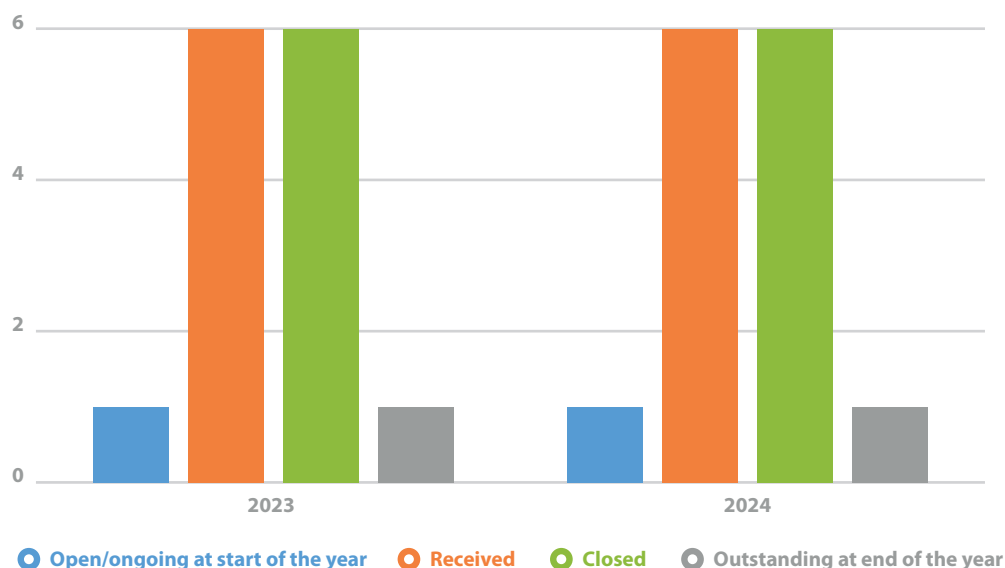
<sup>28</sup> [EO/1524/2024/KW](#).

<sup>29</sup> [EO/1899/2024/VB](#).

<sup>30</sup> [EO/2076/2024/VB](#).

<sup>31</sup> As per the European Ombudsman [Decision on how the European Investment Bank discloses environmental and social information on projects prior to decisions on funding](#), of November 2023 (EO/2252/2022/OAM).

**Figure 6:** Complaints handled by the European Ombudsman



### Example of case closed by the European Ombudsman

#### The EIB's lack of procedure for recognising a staff member as a disabled person<sup>32</sup>

In July 2023, the European Ombudsman informed the EIB of their inquiry into a complaint by an EIB staff member regarding an alleged lack of procedure for recognising staff with disabilities. The European Ombudsman requested that the EIB explain its related rules and practices.

In September 2023, the EIB responded, detailing its comprehensive framework for supporting staff with disabilities, which includes voluntary disclosure of disability status and possible requests for reasonable accommodation. The European Ombudsman submitted follow-up questions, and the EIB provided the necessary explanations. The European Ombudsman also requested a meeting with the relevant EIB services, which took place. While the individual situation of the complainant was not covered by the inquiry, the European Ombudsman also requested information about it. The EIB provided information related to the factual and procedural background of the case, including about the different administrative procedures launched by the complainant in the EIB.

In November 2024, the European Ombudsman informed the EIB that they had closed their inquiry without further action.

### Other non-judicial review mechanisms

In addition to the European Ombudsman, complaints against the EIB Group's activities can be submitted to the European Data Protection Supervisor or the Aarhus Convention Compliance Committee. As in previous years, no such complaints were registered by the Complaints Mechanism in 2024.

<sup>32</sup> [EO/802/2023/PB](#).

## OUTREACH AND OTHER ACTIVITIES

Engaging with and organising events for internal and external stakeholders are crucial parts of the Complaints Mechanism’s work. In 2024, we participated in numerous events with civil society organisations and other independent accountability mechanisms, which fostered collaboration, improved understanding of our mandate, and contributed to transparency and accountability.

The year’s events included:

FEBRUARY	<p><b>Collaborating with other independent accountability mechanisms on jointly financed projects (virtual)</b></p> <p>At the invitation of the Complaints-resolution, Evaluation and Integrity Unit of the Asian Infrastructure and Investment Bank (AIIB), we presented our experience with cases related to the Bangalore metro project, which is co-financed with the AIIB. The online dialogue was attended by over 60 staff members from AIIB and provided an opportunity to exchange knowledge on the handling of cases in jointly financed projects.</p>
MARCH	<p><b>Reaching out to mediators (virtual)</b></p> <p>We co-organised a webinar for mediators from French-speaking countries in Africa. Our co-organisers were the Office of the Compliance Advisor Ombudsman of the International Finance Corporation and Multilateral Investment Guarantee Agency, and the Independent Recourse Mechanism of the African Development Bank Group. Experienced mediators and representatives from these independent accountability mechanisms explored cooperation during dispute resolution processes and the role of civil society organisations.</p>
	<p><b>Raising awareness about accountability at the EIB (Luxembourg)</b></p> <p>We participated in a panel discussion at the “Banking on Europe: Holding Pan-European Public Borrowers to Account” conference, organised by the Robert Schuman Initiative of the University of Luxembourg and the Court of Auditors. The discussion focused on the accountability of intergovernmental borrowers. Together with the Evaluation Division of the EIB Inspectorate General, we presented two core pillars of the EIB’s public accountability functions.</p>
	<p><b>Meeting with civil society organisations (virtual)</b></p> <p>We organised a virtual meeting with civil society organisations to introduce the new Head of the Complaints Mechanism. This gathering brought together representatives from diverse organisations to discuss key issues and enhance collaboration. The meeting was also an opportunity to get feedback about our work and processes and discuss areas for improvement.</p>
APRIL	<p><b>Learning from environmental and social practitioners (Ireland)</b></p> <p>We attended the 43rd Annual Conference of the International Association for Impact Assessment (IAIA24) in Dublin, Ireland. This event, the largest in IAIA’s history with over 1 000 participants, focused on “Impact Assessment for a Just Transformation” through various workshops, theme forums and concurrent sessions. One of our highlights was taking part in the session organised by independent accountability mechanisms of other international financial institutions: Accountability, impact assessment and their capacity to transform projects.</p>

### Strengthening accountability and access to remedy (Kenya)

We organised a two-day in-person workshop on 12 and 13 June in Nairobi, Kenya, focused on strengthening accountability and access to remedy for project-affected communities. Targeting civil society organisations, the workshop was held in cooperation with the [International Accountability Project](#), [Accountability Counsel](#) and eight other independent accountability mechanisms.<sup>33</sup> Representatives from 31 civil society organisations across seven East African countries – Ethiopia, Kenya, Malawi, Rwanda, Tanzania, Uganda and Zambia – engaged in fruitful exchanges during presentations and round-table sessions. For more information about the workshop, please read [this article](#).



Nairobi workshop, 2024.

### Training in dispute resolution (Netherlands)

As part of the University of Groningen summer school in the Netherlands on land acquisition, resettlement and social sustainability, we delivered a module about effective conflict resolution in development projects. By equipping participants with the necessary skills and knowledge, our training aimed to enhance the ability of social specialists and practitioners to support dispute resolution at the project level.

<sup>33</sup> The Office of the Compliance Advisor Ombudsman of the International Finance Corporation and Multilateral Investment Guarantee Agency, the World Bank Accountability Mechanism, the Independent Recourse Mechanism of the African Development Bank Group, the Independent Accountability Mechanism of the U.S. International Development Finance Corporation, the Complaints-resolution, Evaluation and Integrity Unit of the Asian Infrastructure Investment Bank, the Independent Accountability Mechanism of FinDev Canada, the Office of the Independent Complaint Mechanism of Internationale Klimaschutzinitiative, the Independent Complaints Mechanism of Deutsche Investitions- und Entwicklungsgesellschaft (DEG), the Netherlands Development Finance Company, and the Société de Promotion et de Participation pour la Coopération Economique.



### Sharing knowledge and experience with our peers (Philippines)

We participated in the 21<sup>st</sup> annual meeting of the [IAMnet](#) on 1-4 October in Manila. The event was co-hosted by the Asian Development Bank's Accountability Mechanism and the Independent Redress Mechanism of the Green Climate Fund. Over 60 people from the 23 mechanisms of the IAMnet participated, with a further 40 representatives of civil society organisations joining for the civil society organisation day. Key topics included managing policy reviews, improving collaboration in complaints handling, and addressing challenges in dispute resolution cases. We discussed best practices in a policy review of independent accountability mechanisms during the civil society organisation day, which was timely and relevant as we embark on a possible review of the Complaints Mechanism Policy. For more information about the meeting, please read [this article](#).



IAMnet meeting in Manila, 2024.

### Engaging with and listening to civil society organisations

**In Luxembourg:** Following the EIB Board of Directors' seminar with civil society organisations on 15 October, we held our annual hybrid meeting with representatives from six of these organisations. Six attendees joined in person and four participated online in an open and productive exchange.



Meeting with civil society organisations in Luxembourg.



**In Washington DC:** We participated in several activities concerning accountability and civil society during the annual meetings of the International Monetary Fund and the World Bank Group held in Washington DC in October 2024. One activity was a round-table discussion with civil society organisations on accountability topics such as remedy, responsible exit and advisory work, which was organised by the Office of the Compliance Advisor Ombudsman of the International Finance Corporation and Multilateral Investment Guarantee Agency. We also attended a meeting organised by civil society organisations that shared best practices for policy reviews and consultation on accountability policies.

**Raising awareness in local EIB offices (virtual)**

We delivered a session on the mandate and activities of the Complaints Mechanism in Luxembourg as part of the integration of EIB project staff in external offices.

**Training in dispute resolution (Netherlands)**

As part of the University of Groningen winter school on land acquisition, resettlement and social sustainability, we delivered a module about effective conflict resolution in development projects.

**Raising awareness on accountability in Latin America (virtual)**

We co-hosted a webinar with seven independent accountability mechanisms<sup>34</sup> to connect with civil society organisations and project-affected communities in Latin America and increase their awareness about independent accountability mechanisms. A recording of the webinar is available in [Spanish](#). As part of the session, we presented a case study of a handled complaint.

In addition, several members of our team attended training and knowledge-sharing events on various topics, such as impact assessment, climate change and dispute resolution.

<sup>34</sup> The Independent Consultation and Investigation Mechanism of the Inter-American Development Bank Group, the Office of the Compliance Advisor Ombudsman of the International Finance Corporation and Multilateral Investment Guarantee Agency, the World Bank Accountability Mechanism, the Project-Affected People's Mechanism of the Asian Infrastructure Investment Bank, the Independent Accountability Mechanism of FinDev Canada, the Office of Integrity, Compliance and Accountability of the Caribbean Development Bank, and the Social and Environmental Compliance Unit of the United Nations Development Programme.

# REVIEW OF SELECTED CASES RELATED TO EIB ACTIVITIES

This section provides information on some closed and ongoing complaints about EIB projects and activities. If the complaint is not confidential, the initial assessment report and conclusions report (if applicable) are published on our website, with each case having a specific webpage (as provided below). This section also presents selected compliance cases with closed and ongoing monitoring.

## CLOSED CASES

### Complaints investigation and dispute resolution functions

PUNE METRO RAIL	
Region/country:	Asia/India
Type of complaint:	Environmental/social impact
Sector(s):	Transport
Case webpage:	<a href="#">SG/E/2021/09</a>

In February 2021, we received a complaint regarding the [Pune Metro Rail project](#), which consists of the construction of two metro lines totalling 31.3 kilometres and 30 stations, and the purchase of about 100 metro cars in Pune, Maharashtra State, India. The allegations concerned (i) the social impact of the project at one of the metro stations (Civil Court Station), and (ii) environmental and social impact at another station (Mandai Station).

We issued the initial assessment report in March 2022. Given the complexity and diverse nature of the issues raised, as well as the different groups of affected people, we proceeded in parallel with a compliance review for the first allegation (Civil Court Station) and four collaborative dispute resolution processes for the second allegation (Mandai Station). This case illustrates that compliance reviews and collaborative dispute resolutions are not always mutually exclusive. In this exceptional case, because the complaint involved different groups of affected people and raised different allegations, it was possible to differentiate between the different approaches (compliance review and dispute resolution) and design different processes.

#### Compliance review

Part of the complaint was about involuntary resettlement in two informal settlements (slums) for the construction of Civil Court Station (part of the project) and for additional infrastructure developments in the area. The allegations concerned non-compliance with the EIB Environmental and Social Standards for involuntary resettlement.

We found that the EIB was not informed of the original resettlement action plan for the project being replaced with a new common resettlement approach for all infrastructure in the area, nor of the upcoming lawful evictions. We concluded that: (i) the EIB did not assess the institutional framework and failed to identify the agencies involved in the resettlement responsible for this change, and (ii) despite

the COVID-19 restrictions, a more proactive monitoring of the project compliance could have helped to anticipate the evictions. However, once informed, the EIB did mobilise social experts and requested corrective actions by the promoter, including a livelihood restoration plan to benefit the project-affected people and those affected by the additional infrastructure not associated with the project.

We issued the conclusions report in April 2024 with **one recommendation and several suggestions for improvement**, mainly around the implementation and monitoring of the above-mentioned livelihood restoration plan. We are now **monitoring** the implementation of the action points.

### Dispute resolution

At Mandai Station, we put in place four parallel dispute resolution processes with different groups of project-affected people: (i) spice vendors, (ii) a displaced family, (iii) a person concerned about the felling of trees and the removal of places of worship, and (iv) fruit vendors. We had **closed three of these processes in 2022**. Two of the closed processes required monitoring.

**In September 2024, we successfully closed the fourth dispute resolution process.** A group of unlicensed fruit vendors claimed they were forcibly removed from the Mandai market area without compensation. Our team, assisted by a local facilitator, held three rounds of joint dialogue sessions between representatives of the fruit vendors and the promoter. We also conducted training to ensure that the parties were equipped with skills and relevant information about the dispute resolution process to create a conducive environment for productive and safe engagement. The parties reached a settlement, with the promoter agreeing to compensate the fruit vendors for their business losses.

At the end of 2024, we were **monitoring** the agreed actions of three of the dispute resolution processes.



Consultation as part of the dispute resolution process on the Puna Metro Rail project.





MALAWI M1 ROAD REHABILITATION I	
Region/country:	Sub-Saharan Africa/Malawi
Type of complaint:	Environmental/social impact
Sector(s):	Transport
Case webpage:	<a href="#">SG/E/2023/17</a>

In July 2023, we received a complaint from a migrant worker formerly employed in the [Malawi M1 Road Rehabilitation I project](#). The complainant claimed (i) the detention of passports of foreign staff by the project contractor, (ii) the violation of Malawi labour laws, and (iii) non-payment of outstanding salaries to the complainant.

The complainant's concerns were readily resolved, including through a settlement agreement between the contractor and the complainant. We **monitored the implementation of the agreement and closed the complaint** with the issuance of a conclusions report during the initial assessment phase in January 2024.<sup>35</sup> This case is a good example of how cooperation between the complainant and the promoter, and between the dispute resolution and compliance teams in the initial assessment phase, can provide a rapid response to the complainant and address their grievances.

### Complaints investigation function

ZENATA URBAN DEVELOPMENT	
Region/country:	Southern Neighbourhood/Morocco
Type of complaint:	Environmental/social impact
Sector(s):	Construction
Case webpage:	The link for each case is provided in Annex II

Since 2020, we have registered 35 cases<sup>36</sup> (complaints submitted by 74 individuals) about the [Zenata Urban Development project](#) in the Municipality of Ain Harrouda, between Casablanca and Mohammedia, in Morocco. The project covers the development of a new eco-city and involves the resettlement of more than 40 000 people, approximately 70% of whom are on a low income and living in shacks scattered across 17 informal settlements.

The complainants alleged various issues related to the resettlement process, such as (i) long delays between the demolition of their house in the informal settlements and their resettlement in a new apartment in the relocation area, (ii) lack of compensation for the associated transition costs, (iii) issues around eligibility and adequate compensation, including for project-affected people who married after the cut-off date, (iv) lack of transparency of entitlements/compensation and of the local grievance redress mechanism, and (v) health and safety concerns.

<sup>35</sup> In line with paragraph 2.3.3 of the EIB Group Complaints Mechanism Procedures.

<sup>36</sup> Including six inadmissible cases.



Meeting as part of the monitoring mission about the Zenata Urban Development project.

Following our compliance reviews, we identified non-compliances of the project with the EIB Environmental and Social Standards and concluded that the EIB had failed to properly identify and monitor the risks and impact of the approach followed by the Moroccan authorities, specifically the application of the Ville Sans Bidonvilles (VSB) national programme, which we considered not to be aligned with the EIB Environmental and Social Standards. In April 2024, we **issued recommendations and suggestions for improvement** to the Bank for four major cases, including the recommendation to agree on a corrective action plan to be developed by the promoter to ensure the project complies with the EIB's Standard 6 on involuntary resettlement, and the recommendation to take all necessary measures under the finance contract to ensure the promoter finalises and implements the corrective action plan.

Following the publication of our two conclusions reports covering these four cases in April 2024 ([SE/E/2021/08](#) and [SG/E/2022/11a, 11c and 18](#)), the competent EIB services have been working with the promoter to finalise a corrective action plan.

**As part of our monitoring function**, we visited the site in September 2024 and met with the promoter to discuss the development and implementation of the corrective action plan. We also met with several complainants to follow up on their respective complaints, the situation on the project site and their interactions with the promoter.

Our monitoring confirms that a significant risk remains for the project to achieve full compliance with the EIB's Environmental and Social Standards, mainly due to the gap between the EIB standards and the national context in which the project operates (VSB national programme). Our first monitoring report should be published in the first quarter of 2025.

In 2024, we also received new complaints about the Zenata Urban Development project, with allegations raising similar issues as those in the two conclusions reports mentioned above. These complaints were therefore swiftly closed by referring to the recommendations in the two existing conclusions reports, which are under monitoring.

As of the end of 2024, the status of cases relating to the Zenata Urban Development project was as follows:

- We closed 30 cases.<sup>37</sup>
- We were monitoring 13 cases.<sup>38</sup>
- We were handling five cases, including one through a collaborative dispute resolution process.<sup>39</sup>

37 [SG/E/2021/08](#), [SG/E/2022/08](#), [SG/E/2022/11A](#), [SG/E/2022/11b](#), [SG/E/2022/11c](#), [SG/E/2022/18](#), [SG/E/2022/19](#), [SG/E/2023/01](#), [SG/E/2023/02](#), [SG/E/2023/05](#), [SG/E/2023/09](#), [SG/E/2023/10](#), [SG/E/2023/11](#), [SG/E/2023/13](#), [SG/E/2023/14](#), [SG/E/2023/15](#), [SG/E/2023/16](#), [SG/E/2023/19](#), [SG/E/2023/22](#), [SG/E/2023/23](#), [SG/E/2023/24](#), [SG/E/2023/25](#), [SG/E/2024/26](#), [SG/E/2023/29](#). In addition, six cases were declared inadmissible: [SG/INA/2020/27](#), [SG/INA/2023/01](#), [SG/INA/2024/08](#), [SG/INA/2024/09](#), [SG/INA/2024/20](#), [SG/INA/2024/21](#).

38 [SG/E/2021/08](#), [SG/E/2022/11A](#), [SG/E/2022/11C](#), [SG/E/2022/18](#), [SG/E/2023/10](#), [SG/E/2023/11](#), [SG/E/2023/13](#), [SG/E/2023/14](#), [SG/E/2023/15](#), [SG/E/2023/16](#), [SG/E/2023/19](#), [SG/E/2023/22](#), [SG/E/2023/23](#).

39 [SG/E/2022/07](#), [SG/E/2023/04](#), [SG/E/2024/09](#), [SG/E/2024/17](#), [SG/E/2024/18](#).







**SRWB WATER SUPPLY AND SANITATION PROGRAMME**

Region/country:	Sub-Saharan Africa/Malawi
Type of complaint:	Environmental/social impact
Sector(s):	Water, sewerage
Case webpage:	<a href="#">SG/E/2022/05</a>

In March 2022, we received two complaints about the [Southern Regional Water Board Water Supply and Sanitation Programme](#) in Malawi. The complaints concerned the Mangochi component, especially the facilities in Lake Malawi National Park, which is a UNESCO World Heritage Site for its outstanding biodiversity and landscape value. The Mangochi component is financed by the Kuwait Fund for Arab Economic Development and is an integral part of the EIB-financed project. The complaints included allegations of non-compliance of the project with the EIB Environmental and Social Standards, such as: (i) gaps in the analysis of alternatives, (ii) gaps in stakeholder engagement, (iii) gaps in the environmental and social impact assessment, (iv) gaps in biodiversity studies, (v) non-compliance with UNESCO conventions and guidelines, and (vi) a lack of environmental and social management and monitoring.

We carried out a compliance review and issued a conclusions report in April 2024. For most of the allegations, we found non-compliance of the project with the relevant EIB Environmental and Social Standards. We concluded that the Bank's environmental and social appraisal of the project did not properly assess the gaps between the EIB Environmental and Social Standards and those of the co-lender, and failed to identify and mitigate significant environmental and social risks.

Accordingly, we **issued recommendations and suggestions for improvements** to the EIB to (i) clarify the environmental and social risk categorisation methodology and associated minimum appraisal requirements in the environmental and social procedures, (ii) ensure that a biodiversity assessment is undertaken to confirm whether the site is a critical habitat and if further mitigation/offset measures are needed, (iii) ensure that the promoter's capacity to manage environmental and social impact is reinforced, and (iv) ensure that the biodiversity assessment is published.

At the end of 2024, we **were monitoring** the action points for this case.







**BARRAGE RÉSERVOIR DE LOM PANGAR AND NACHTIGAL HYDROPOWER PLANT**

Region/country:	Sub-Saharan Africa/Cameroon
Type of complaint:	Environmental/social impact
Sector(s):	Energy
Case webpage:	<a href="#">SG/E/2022/16</a>

In August 2022, we received a complaint from a local cooperative in Cameroon. The complainant alleged poor consultation and information sharing about the negative environmental and social impact of two hydropower projects ([Lom Pangar](#) and [Nachtigal](#)) on 41 villages located between the two respective dams. In particular, the complainant stated that the assessments of the environmental and social impact only covered the upstream effects of the Lom Pangar dam and not its downstream effects, such as the impact on the health and livelihoods of sand miners and fishermen.

Our initial assessment report recommended a collaborative dispute resolution process given the parties' openness to dialogue. In November 2023, we visited Cameroon to meet all involved parties. During our visit, the promoter of the Lom Pangar project withdrew from the dispute resolution process. Consequently, we initiated a compliance investigation for the Lom Pangar project in February 2024 to assess adherence to the relevant EIB Environmental and Social Standards. For the Nachtigal project, we determined that a compliance review was unwarranted since the complainants were all located upstream of the hydropower project and the impact on their livelihood could not be attributed to the dam under construction.

We published our compliance review for the Lom Pangar dam project in December 2024. We concluded that the EIB services did not adequately monitor the project to ensure the promoter finalised the environmental and social impact assessment of the downstream section of the Sanaga river, as detailed in the environmental and social management documentation of the project. We therefore **recommended** that the Bank takes, in good faith, all reasonable steps to ensure the proper implementation of the EIB's Environmental and Social Standards applicable to the Lom Pangar project. This would include finalising the downstream impact assessment of the Lom Pangar dam project, engaging with all parties/communities located downstream of the dam, preparing a communication plan to prevent the risks in case of water release, and agreeing on which of the different parties involved is responsible for each of the proposed mitigation measures.

At the end of the year, this case was **under monitoring**.

#### DISCLOSURE OF A DATA LICENSE AGREEMENT

Region/country:	N/A
Type of complaint:	Access to information
Sector(s):	N/A
Case webpage:	<a href="#">SG/A/2023/02</a>

In July 2023, we received a complaint from a blogger about the partial refusal of access to information in a Data License Agreement between the EIB and ILX B.V. ("the Agreement"). The complainant considered that the exceptions to disclosure cited by the EIB (Articles 5.4(b) and 5.5 of the EIB Group Transparency Policy (EIB-TP) were not justified.

For Article 5.4(b) of the EIB-TP, which concerns the protection of privacy and integrity of the individual, the Agreement contained personal data (names, initials, titles, email addresses, and signatures). We verified whether the individuals gave their non-objection to the disclosure of their personal data; none did. However, some additional redactions did not qualify as personal data under Regulation (EU) [2018/1725](#) – the EU regulation outlining how EU institutions, bodies, offices and agencies protect and process personal data.

For Article 5.5 of the EIB-TP, which concerns the protection of commercial interests, we found that although some contractual terms and banking information could harm commercial interests, the use of licensed statistics and approved product information did not pose a foreseeable risk. The EIB did not meet the burden of proof for these redactions.

Based on the above findings, we **recommended** that the EIB reassess whether redactions pertaining to the use of licensed statistics and the approved product foreseeably undermine the interest protected by the exception relied on. In undertaking the recommended reassessment, and given the passage of time, we **suggested** that the EIB also (i) reassess whether applying the particular exception to specific contractual terms and banking information is still justified, and (ii) consider the full reassessment in the context of recent statistical reports that have been published for the first time.

We also recommended/suggested that certain non-personal data (licensor and licensee contact information and the single initial present on numerous pages of the Agreement) be made available to the complainant.

At the end of the year, this case was **under monitoring**.

## Dispute resolution function

### APPUI AU SECTEUR DE L'EAU POTABLE

Region/country:	Southern Neighbourhood/Tunisia
Type of complaint:	Environmental/social impact
Sector(s):	Water, sewerage
Case webpage:	<a href="#">SG/E/2023/08</a>

In March 2023, we received a complaint from an individual in Tunisia alleging a lack of (i) adequate compensation, (ii) informed participation, and (iii) mitigation of adverse effects of the [Appui au secteur de l'eau potable project](#). The complainant claimed that approximately 1.5 hectares of their agricultural land with about 140 olive trees had been expropriated due to the project. In addition to the compensation to be paid, the complainant requested the promoter to save as many olive trees as possible from being uprooted and to provide access to the remaining part of the land not affected by the project.

Following our initial assessment, we recommended a dispute resolution process. The complainant and the promoter **reached an amicable agreement** through a joint dialogue, supported by our team and the EIB project team. The promoter paid the compensation for the trees and provided guarantees that the complainant would retain access to the remaining land. It was agreed that the EIB project team will follow up on the latter as part of its regular monitoring of the project.







### Monitoring function – closed monitored cases (compliance)

MARIŠČINA COUNTY WASTE MANAGEMENT CENTRE	
Region/country:	European Union/Croatia
Type of complaint:	Environmental/social impact
Sector(s):	Water, sewerage
Case webpage:	<a href="#">SG/E/2019/07</a>

In 2019, we received a complaint about [the Marišćina County Waste Management Centre project](#). The complainant raised allegations concerning (i) the operation of the mechanical biological treatment plant and the bioreactor landfill, (ii) methane emissions, and (iii) hydrogen sulphide ambient standards and odour.

Our compliance review was finalised in November 2022 and showed that: (i) the volume of mixed municipal waste being converted into fuel was significantly lower than planned, and there were issues with fuel disposal (storing the fuel in the centre) potentially reducing the lifespan of the centre; (ii) the centre did contribute to methane emission reduction; and (iii) the local population still complained about the unpleasant odour, which the operator was addressing. The review also showed that the Bank: (i) was not informed of some of the fuel-related challenges and had limited scope to intervene as the promoter had not opted to receive technical assistance; (ii) carried out its role as required for methane emissions; and (iii) carried out its role as required for the unpleasant odour.

Recognising an opportunity to avoid the occurrence of similar issues, we suggested that the Bank use its experience from this project when dealing with future similar projects. In January 2024, the Bank **published** the [Managing refuse-derived and solid recovered fuels](#) report, including a summary for Croatia. Taking this into account, we closed the monitoring process for this case.

**GEEREF/AKIIRA GEOTHERMAL POWER PLANT**

Region/country:	Sub-Saharan Africa/Kenya
Type of complaint:	Environmental/social impact
Sector(s):	Energy
Case webpage:	<a href="#">SG/E/2020/08</a> and <a href="#">EIF/E/2020/01</a>

In June 2020, we received a complaint<sup>40</sup> alleging the negative social impact of the [Akiira One Geothermal Power Plant](#) in Kenya. The project is partly financed by the DI Frontier Market Energy and Carbon Fund (the Fund), in which the Global Energy Efficiency and Renewable Energy Fund (GEEREF) invested. GEEREF is advised by the EIF and the EIB. Furthermore, the EIB is an investor in GEEREF and the EIF represents the European Union's shareholding in GEEREF as trustee for the European Commission.

The complainant alleged failure of the EIB Group to (i) assess and monitor the Fund's capacity to assess and monitor the effectiveness of the environmental and social management system of its underlying investments and, ultimately, the impact on the ground; and (ii) take appropriate actions towards GEEREF to ensure that the Fund prevents and/or mitigates the alleged negative effects of eviction.

Our compliance review concluded that the EIB Group did review, at appraisal, the Fund's environmental and social resources and policies and requested improvements but failed to (i) monitor whether the Fund developed the relevant policies for land acquisition and resettlement, and (ii) verify compliance with the EIB Environmental and Social Standards when informed about a risk of eviction. The EIB Group did however perform enhanced monitoring of the Fund after the eviction occurred.

We recommended that the EIB Group (i) involve an EIB social specialist, (ii) monitor the development and implementation of a remediation plan for the evictees, a grievance redress mechanism, and other social management plans, and (iii) report to GEEREF on the matter.

We followed up with the EIB Group on our recommendations until May 2024, when we closed the monitoring process for these cases. This decision was based on **evidence** that an EIB social specialist was involved in the enhanced monitoring of the development and implementation of the above-mentioned plans (available on [the Fund's website](#)), and that the EIB Group was regularly reporting to GEEREF on the matter.

<sup>40</sup> This complaint was registered under two cases: an EIF-related case and an EIB-related case.

## ONGOING CASES

### Complaints investigation function

#### POKLEČANI WIND FARM

Region/country:	Western Balkans/Bosnia and Herzegovina
Type of complaint:	Environmental/social impact
Sector(s):	Energy
Case webpage:	<a href="#">SG/E/2024/03</a> and <a href="#">SG/E/2024/25</a>

In 2024, we received two complaints from the same individual concerning the [Poklečani Wind Farm project](#), which consists of the design, construction and operation of an onshore windfarm with total installed capacity of 132 MW in the wider mountainous area of West Herzegovina-Canton in the Municipality of Posušje.

The complainant alleges that the project breaches the following EIB Environmental and Social Standards: Standard 1 on Environmental and Social Impacts and Risks, Standard 2 on Stakeholder Engagement, Standard 3 on Resource Efficiency and Pollution Prevention, Standard 4 on Biodiversity and Ecosystems, Standard 5 on Climate Change, Standard 6 on Involuntary Resettlement, and Standard 10 on Cultural Heritage.

We published the initial assessment reports for these two cases in June and November 2024, respectively, with both recommending a compliance review. As of the end of 2024, the cases were under investigation. As communicated to the complainant, we plan to close both cases with one conclusions report during the first quarter of 2025.

Connected to this project, CEE Bankwatch Network requested an internal review by the EIB under the Aarhus Regulation. The Bank completed this review in October 2024, concluding that the elements in the request for internal review did not justify the need for any additional actions by the Bank about the financing of the project.<sup>41</sup>

#### BOLIVIA MI AGUA WATER AND SANITATION

Region/country:	Latin America/Bolivia
Type of complaint:	Environmental/social impact
Sector(s):	Water, sewerage
Case webpage:	<a href="#">SG/E/2023/28</a>

In October 2023, we received a complaint about the Drinking Water System Palacio Tambo sub-project that is part of the [Bolivia Mi Agua Water and Sanitation investment project](#) in Bolivia. For this sub-project, water is abstracted from the Japo community territory and delivered to the Palacio Tambo community.

The complaint was submitted by a representative of the Japo community. The complainant alleges that the project does not comply with the EIB Environmental and Social Standards, in particular (i) lack of prior and meaningful stakeholder engagement, (ii) lack of Free Prior and Informed Consent, and (iii) violence and retaliation as part of the sub-project implementation.

We issued an initial assessment report in August 2024. At the end of the year, our compliance review of the allegations to investigate possible maladministration by the EIB was ongoing, assessing the project documentation and the reasonable due diligence and monitoring of the project by the Bank.

<sup>41</sup> For more details, see the [EIB's reply to the CEE Bankwatch Network request](#).



## Dispute resolution function

CORRIDOR VC MEDAKOVO – POPRIKUSE <sup>42</sup>	
Region/country:	Western Balkans/Bosnia and Herzegovina
Type of complaint:	Environmental/social impact
Sector(s):	Transport
Case webpage:	<a href="#">SG/E/2024/16</a>

In April 2024, we received a complaint from an individual about the potential negative environmental and social impact of the [Corridor Vc Medakovo – Poprikuse project](#) on the settlement of Močarac. The main concerns of the complainant are the increased risk of flooding to their property and the inadequate width of a bypass connecting the settlement of Močarac and the village of Ozimica. Additionally, the complainant claims that the ongoing construction work has damaged their house and created dust, air pollution and noise. The complainant further alleges inadequate stakeholder engagement and is concerned about the potential negative impact of the project following its completion.

After an initial assessment of the information available and exchanging views with the promoter and other project stakeholders, we proposed a collaborative dispute resolution process, to which the complainant and the promoter agreed. As of end 2024, we held various individual calls and meetings separately with the parties. A first meeting with all stakeholders and a local facilitator (hired by us) was organised by the promoter to discuss the issues presented by the complainant.



<sup>42</sup> In addition to this case being handled through a dispute resolution process, we received three other complaints related to this project (one closed in 2024 [SG/E/2024/01](#), one declared inadmissible in August 2024 [SG/E/2024/23](#), and one that is ongoing [SG/E/2024/11](#)).



#### GREATER COLOMBO WASTEWATER PROJECT

Region/country:	Asia/Sri Lanka
Type of complaint:	Environmental/social impact
Sector(s):	Water, sewerage
Case webpage:	<a href="#">SG/E/2024/27</a>

In June 2024, we received a complaint from a community of approximately 37 households in the Narahenpita neighbourhood in Colombo about the potential environmental and social impact of the [Greater Colombo Wastewater project](#). The complaint focused on a wastewater pumping station. The complainants claimed (i) potential damage to surrounding houses, (ii) unpleasant smells, (iii) health risks, and (iv) inadequate stakeholder engagement.

During the initial assessment, the complainants and the promoter agreed to a collaborative dispute resolution process to find suitable solutions to the concerns raised. With the support of a local facilitator, we convened the first dialogue session between the complainants and the promoter in October 2024.

Policy Pillar, a Sri Lankan non-governmental organisation, has been providing valuable support to the complainants in the dispute resolution process, contributing to a dialogue on a level playing field where all voices are heard and concerns are addressed effectively.



Facilitation meeting as part of the dispute resolution process on the Greater Colombo wastewater project.



### Monitoring function<sup>43</sup> – cases under monitoring (compliance)

NEPAL POWER SYSTEM EXPANSION	
Region/country:	Asia/Nepal
Type of complaint:	Environmental/social impact
Sector(s):	Energy
Case webpage:	<a href="#">SG/E/2018/39</a>

In October 2018, the Free Prior and Informed Consent (FPIC) and Rights Forum from Lamjung district (Nepal) submitted a complaint about the EIB-funded 220 kV Marsyangdi Corridor transmission line. The complaint mainly concerned Component 2 of the [Nepal Power System Expansion project](#), with the allegations falling under four groups of issues: (i) lack of adequate analysis of environmental and social impact, (ii) lack of meaningful stakeholder engagement, (iii) lack of Free Prior and Informed Consent of indigenous people, and (iv) failings in land acquisition, land-use restrictions, and compensation. We issued our conclusions report in April 2021 with six recommendations for the Bank.

As of the end of 2024, we had **closed the monitoring process of five recommendations** that we consider implemented, namely:

- Updating the corrective environmental and social action plan.
- Strengthening of the promoter's capacity, including expertise in stakeholder engagement and, more specifically, on indigenous people.
- Enhancing the Bank's monitoring of the project and the delivery of further technical guidance on environmental and social matters.
- Considering progression in implementing the updated environmental and social action plan for further disbursements.
- Organising a workshop with the promoter and other key stakeholders on stakeholder engagement.

In October 2024, we conducted a **monitoring visit**. We analysed the Bank's efforts to implement our recommendations and reviewed the promoter's progress towards achieving project compliance with the relevant EIB Environmental and Social Standards. We also assessed implementation of the corrective environmental and social action plan. We observed that challenges remained, particularly for meaningful stakeholder engagement and perceived health and safety impact of the project, and noted that there were differing views on the application of Free Prior and Informed Consent and on the compensation offered.

The Bank and the promoter agreed on an approach to indigenous people's requirements, which was published as part of the stakeholder engagement plan.<sup>44</sup> The project appears to have adopted the maximum compensation rate applied for the right of way in other projects in the country. As of the end of 2024, a dialogue and negotiation process on 11 agenda points determined by the complainant was ongoing between the promoter, the complainant, LAHURNIP<sup>45</sup> and other representatives of local communities. The parties considered that most points were yet to be resolved, risking conflict escalation. Some of these issues would require national level policy discussions beyond the project.

We expect to publish the first monitoring report for this case (covering the period of 2021 to 2024) in the first quarter of 2025. **Monitoring the implementation of recommendation six is ongoing** and involves developing a checklist for EIB staff to review the quality of the cumulative effects assessment as part of impact assessments.

<sup>43</sup> See also information provided above about the monitoring of the cases related to the Zenata Urban Development project.

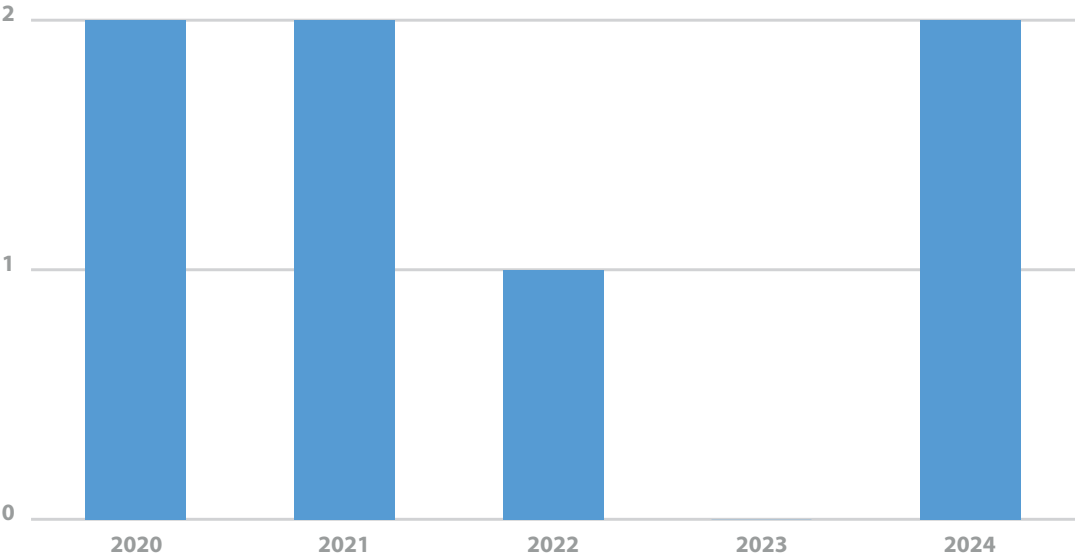
<sup>44</sup> See Annexes II and III of the [Stakeholder Engagement Plan](#) for the Nepal Power System Expansion project.

<sup>45</sup> Lawyers' Association for Human Rights of Nepalese Indigenous Peoples (LAHURNIP).

# REVIEW OF CASES RELATED TO EIF ACTIVITIES

In 2024, we received and closed two complaints about EIF activities. One complaint concerned a call for expression of interest for the selection of financial intermediaries, and the other complaint was declared inadmissible as it was an anonymous complaint.

Figure 7: EIF complaints received between 2020 and 2024



## CLOSED CASE

### Complaints investigation function

CALL FOR EXPRESSION OF INTEREST EIF EoI GR – N. 2024/01	
Region/country:	N/A
Type of complaint:	Own governance/administration
Sector(s):	N/A
Case webpage:	<a href="#">EIF/G/2024/01</a>

In October 2024, we received a complaint alleging that the EIF documents for the Call for Expression of Interest (CEoI) to select financial intermediaries under EquiFund II contained conflicting information regarding the time of the deadline for submission of the expressions of interest.

The expression of interest from the complainant was declared ineligible by the EIF owing to its submission after the deadline indicated in the EIF documents. The complainant found this decision unfair because they considered the EIF documents to include conflicting information.

We concluded that **there were no irregularities** in the EIF's decision to declare the complainant's application ineligible and closed the complaint without recommendations.



# 2025 OUTLOOK

We will continue addressing concerns from the public about the EIB Group's projects and activities, handling complaints efficiently and in a timely manner. In addition to this core work, our efforts next year will be directed towards the following objectives:

## REVIEW OF OUR POLICY AND PROCEDURES

In line with section 9 of the EIB Group Complaints Mechanism Policy, we will consider the need for a review of our policy, incorporating the results of the external review of the Complaints Mechanism that was launched in March 2024. If a review of our policy goes ahead, the process will be a major activity for us in 2025 and will involve consultation with internal and external stakeholders of the EIB Group, including civil society organisations.

## FURTHER STRENGTHEN OUR DISPUTE RESOLUTION AND MONITORING FUNCTIONS

We will further strengthen our dispute resolution function. We will also continue our efforts towards enhancing transparency around our monitoring and, if possible, conduct selected monitoring visits as we did in 2024.

## FURTHER DIGITALISE OUR WORK

We will continue advancing digitalisation in our work to improve our efficiency, including:

- rolling out the new electronic case management system;
- upgrading current monitoring tools to a more user-friendly IT platform;
- exploring tools using artificial intelligence;
- enhancing the digital skills of our staff;
- improving our website to enhance transparency and user experience.

## OUTREACH

We will continue raising awareness about the Complaints Mechanism's work, encouraging engagement and fostering trust with our external stakeholders. Among other steps, we will:

- enhance the skills of local facilitators and mediators who support our dispute resolution work, particularly in the Middle East and North Africa;
- increase awareness of the Complaints Mechanism's existence and mandate in various countries and regions where the EIB Group operates;
- continue to engage with civil society organisations.

## IN-REACH

We will continue engaging with the EIB Group staff and governing bodies about the Complaints Mechanism's work, aiming to:

- raise awareness of our added value among the EIB services and governing bodies;
- promote better cooperation with operational teams and institutional learning from our findings;
- collaborate in delivering training on relevant environmental and social matters.

# ANNEX I – CASE STATISTICS

## GENERAL OVERVIEW

Caseload	2020	2021	2022	2023	2024
Open/ongoing at start of the year	60	43	43	44	44
Cases registered	77	64	54	60	69
Cases handled	137	107	97	104	113
Cases closed	94	64	53	60	80
Outstanding at end of the year	43	43	44	44	33

*In 2024, the Complaints Mechanism handled 113 cases and closed 80 of them. This represents a 33% increase in the number of cases closed compared to the previous year. At the end of the year, 33 cases were outstanding – a 25% decrease from the previous year. Most of the open cases at year-end were cases that were registered in 2024.*

The number of new complaints increased by 15% compared to the previous year, with 69 new cases registered in 2024. Of the 63 complaints submitted directly to the Complaints Mechanism, we declared 39 admissible. The remaining six new complaints were filed with the European Ombudsman, who declared all of them admissible.

Incoming complaints	2020	2021	2022	2023	2024
<b>Total complaints received</b>	<b>77</b>	<b>64</b>	<b>54</b>	<b>60</b>	<b>69</b>
Complaints submitted directly to the Complaints Mechanism	67	56	47	54	63
Inadmissible	27	17	13	10	24
Admissible	40	39	34	44	39

Complaints brought before other institutions<sup>46</sup>

<i>European Ombudsman</i>	10	8	6	6	6
Inadmissible	0	2	1	1	0
Admissible	10	6	5	5	6
<i>Office of the United Nations High Commissioner for Human Rights</i>	0	0	1	0	0

The higher proportion of complaints declared inadmissible by the mechanism in 2024 is mainly due to a more streamlined way of registering incoming complaints, especially for complaints about the Zenata Urban Development project. For this project, we started grouping new individual complaints under existing cases in 2024 (therefore not counting these as new separate cases), given the similarity in the allegations raised and the fact that we had already analysed most of the allegations in our two conclusions reports that were published in April.<sup>47</sup>

<sup>46</sup> Complaints against EIB Group activities can also be submitted to the European Data Protection Supervisor and the Aarhus Convention Compliance Committee. For the last five years, there was no such complaint open in the Complaints Mechanism's registry.

<sup>47</sup> See section titled "[Review of selected cases related to EIB activities](#)" for more details about the cases related to this project. Note that in 2024, we were replying to every individual complaint (even if registered under an existing case).

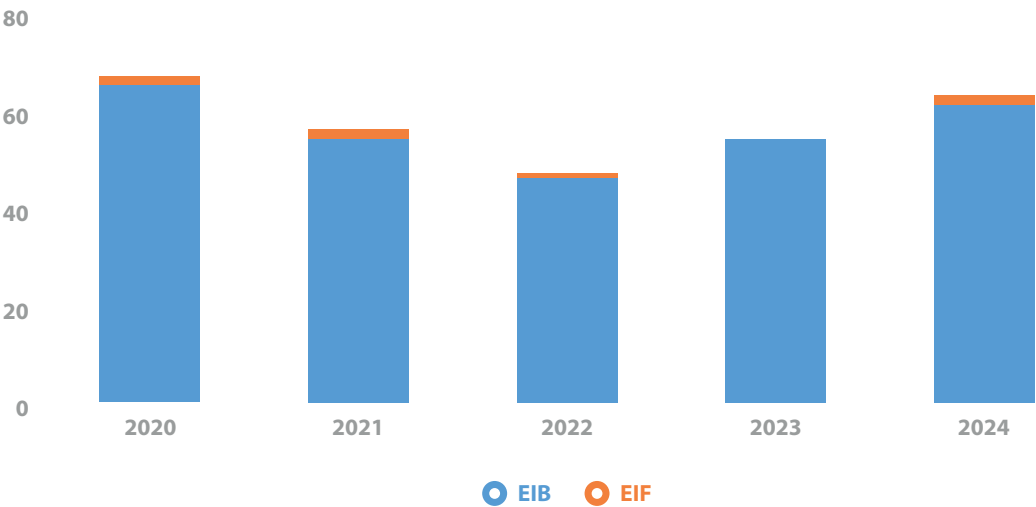
Admissible complaints are those concerning a decision, action and/or alleged omission by the EIB Group – even at early stages when the EIB Group is only considering providing support.

**Inadmissible complaints include those:**

- concerning fraud or corruption (which are handled by the Inspectorate General Investigation Division);
- from EIB staff members;
- concerning international organisations, EU bodies, or national and local authorities;
- that have already been brought against a member of the EIB Group before other administrative or judicial review mechanisms, or are brought subsequently, or have already been settled by other administrative or judicial review mechanisms;
- concerning project procurement (within the mandate of the [EIB Project Procurement Complaints System](#));
- submitted anonymously (confidentiality is assured);
- that seek an unfair competitive economic advantage, or are excessive, repetitive or clearly frivolous or malicious in nature.

*(Complaints Mechanism Policy, Article 4.3)*

Most complaints submitted directly to the Complaints Mechanism concern EIB activities. In 2024, we received two complaints related to EIF activities.



## NEW COMPLAINTS DECLARED ADMISSIBLE BY THE COMPLAINTS MECHANISM IN 2024

### Complaints by type

As in previous years, complaints concerning the environmental and social impact of EIB Group-financed projects represent the largest proportion of admissible complaints (77% in 2024). The proportions of complaints related to own governance and administration and human resources decreased in 2024 compared with 2023.

New admissible complaints	2020		2021		2022		2023		2024	
	n	%	n	%	n	%	n	%	n	%
Access to information (A)	2	5	1	2	2	6	2	5	3	8
Customer relations (C)	0	0	0	0	1	3	0	0	0	0
Environmental/social impact (E)	23	58	27	69	23	68	27	61	30	77
Governance of financed projects (F)	5	12	3	8	0	0	1	2	0	0
Own governance and administration (G)	7	18	3	8	7	20	7	16	2	5
Human resources (H)	3	7	5	13	1	3	7	16	4	10
<b>Total</b>	<b>40</b>	<b>100</b>	<b>39</b>	<b>100</b>	<b>34</b>	<b>100</b>	<b>44</b>	<b>100</b>	<b>39</b>	<b>100</b>

### Project-related complaints by region

Of the complaints declared admissible by the Complaints Mechanism in 2024, 82% related to EIB-financed projects (32 out of 39 new admissible cases), with most of these concerning environmental and social impact (94%).

In 2024, 59% of project-related complaints concerned projects beyond Europe (93% in 2023). The number of complaints about projects in the Western Balkans continued to increase (22% in 2024 vs. 10% in 2020). While we continued to receive numerous complaints related to the same project in Morocco (Zenata Urban Development), this is not reflected in the number of cases concerning projects in the Southern Neighbourhood owing to the registration of the individual complaints with similar issues under existing cases, as explained above.

About half of the complaints in the European Union were about a project in Germany (Zero Carbon Lithium). These complaints were dealt with through the prevention procedure.

New admissible project-related complaints	2020%	2021%	2022%	2023%	2024(n)	2024%
Asia	7	10	4	0	3 <sup>48</sup>	9
Eastern Neighbourhood	10	3	0	0	1 <sup>49</sup>	3
European Union	45	45	16	7	13	41
Southern Neighbourhood	14	12	44	69	5 <sup>50</sup>	16
Latin America	0	10	4	7	0	0
Other	0	0	4	7	0	0
Sub-Saharan Africa	14	10	12	10	3 <sup>51</sup>	9
Western Balkans	10	10	16	0	7 <sup>52</sup>	22
<b>Total</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>32</b>	<b>100</b>

The new admissible project-related complaints (32) relate to 20 different projects globally (seven projects in the European Union and 13 projects beyond the European Union), as highlighted in the table below.

48 India, Sri Lanka and Tajikistan.

49 Georgia.

50 Morocco and Tunisia.

51 Kenya and Malawi.

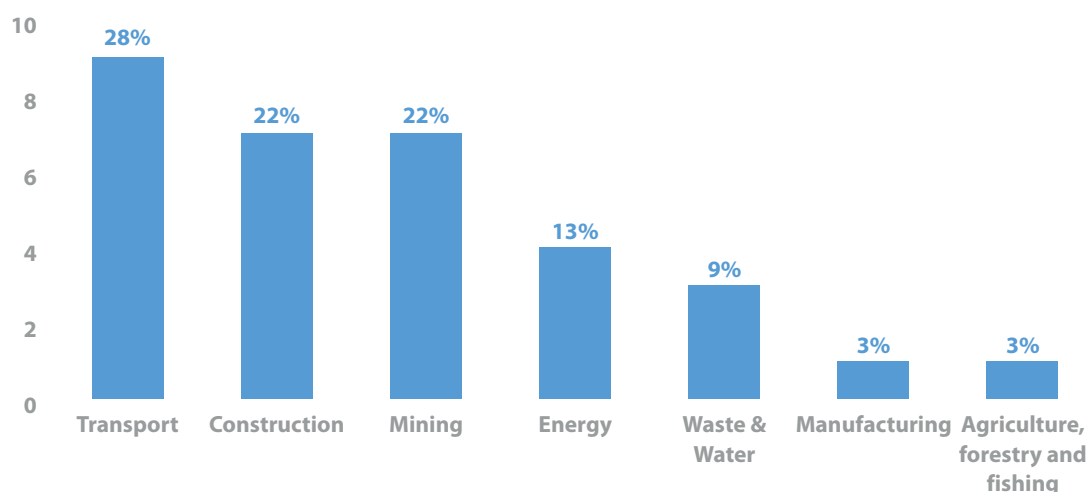
52 Albania, Bosnia and Herzegovina, and Serbia.



Number of projects with new admissible cases by region	2024
Asia	3
Eastern Neighbourhood	1
European Union	7
Southern Neighbourhood	2
Sub-Saharan Africa	3
Western Balkans	4
<b>Total</b>	<b>20</b>

### Project-related complaints by sector

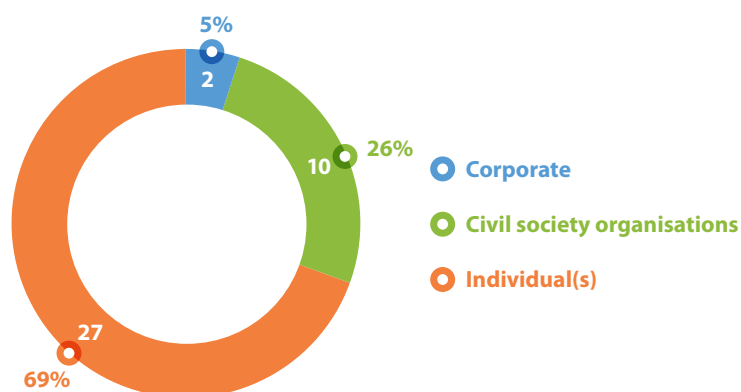
Transport is the sector with the most complaints, followed by construction and mining,<sup>53</sup> and then energy.



### Complaints by origin

New admissible complaints in 2024 were mainly lodged by individuals (69%); 78% of their allegations concerned E cases (environmental and social impact of projects), 16% were H cases (human resources), 3% were G cases (governance and administration), and 3% were A cases (access to information).

The proportion of complaints submitted by civil society organisations increased to 26% of the total. Their allegations primarily concerned E cases (80%), followed by A cases (20%). Complaints submitted by corporates decreased to 5%, with their allegations evenly split between E cases (50%) and G cases (50%).



53 All complaints in the mining sector relate to the same project in Germany (Zero Carbon Lithium).

## COMPLAINTS HANDLED<sup>54</sup>

Of the 113 cases handled in 2024 (vs. 103 in 2023), 33 cases were outstanding at year-end, which is a 25% decrease from the previous year. We closed 33% more cases this year (80 vs. 60 in 2023), and most of the open cases at the end of the year were cases that were registered in 2024.

For more details, please consult the table at the beginning of this Annex.

### Handled complaints by type

Type of complaint	Complaints handled in 2023		Complaints handled in 2024	
	n	%	n	%
European Ombudsman (E0)	7	7	7	6
Access to information (A)	5	5	5	5
Customer relations (C)	1	1	0	0
Environmental/social impact (E)	63	60	67	59
Governance of financed projects (F)	1	1	0	0
Own governance and administration (G)	8	8	4	4
Human resources (H)	7	7	6	5
Inadmissible (INA)	11	10	24	21
<b>Subtotal</b>	<b>103</b>	<b>99</b>	<b>113</b>	<b>100</b>
Inquiry received from the Office of the UN High Commissioner for Human rights	1	1	0	0
<b>Total</b>	<b>104</b>	<b>100</b>	<b>113</b>	<b>100</b>

As in previous years, more than half of the complaints managed by the Complaints Mechanism in 2024 were E cases. These cases are typically the most complex, often involving numerous complainants and/or multiple allegations.

<sup>54</sup> This includes cases still open at the end of 2023 and complaints lodged with the European Ombudsman.

## CLOSURE OF REGISTERED CASES LODGED WITH THE COMPLAINTS MECHANISM

In 2024, the Complaints Mechanism closed 80 cases: 74 had been submitted directly to us and six had been lodged with the European Ombudsman.

Outcome of cases closed by the Complaints Mechanism <sup>55</sup>	2024	%
<i>Admissible cases</i>		
Recommendation	17 <sup>56</sup>	23
No grounds	12	16
Prevention	10 <sup>57</sup>	14
Friendly solution	8	11
No further inquiry needed	3	4
<b>Subtotal of admissible complaints</b>	<b>50</b>	<b>68</b>
<i>Inadmissible cases</i>	24	32
<b>Total</b>	<b>74</b>	<b>100</b>

In five of the closed cases, the Complaints Mechanism made suggestions for improvement.<sup>58</sup>

## OVERVIEW OF EUROPEAN OMBUDSMAN CASES

Caseload	2020	2021	2022	2023	2024
Open/ongoing at the start of the year	4	4	5	1	1
Received	10	8	6	6	6
Closed	10	7	10	6	6
Outstanding at the end of the year	4	5	1	1	1

### Outcome of European Ombudsman cases<sup>59</sup>

Outcome of closed cases	2023	2024
Inadmissible <sup>60</sup>	1	0
Insufficient grounds to open an inquiry	1	0
Withdrawn by the complainant	0	0
Settled	1	5
No maladministration found	1	0
Recommendations	2	0
Closed without further action	0	1
Suggestions for improvement	3	0

<sup>55</sup> Annex III defines the outcomes for cases submitted to the Complaints Mechanism.

<sup>56</sup> 13 of these cases relate to the Zenata Urban Development project (Morocco).

<sup>57</sup> Six of these cases relate to the Zero Carbon Lithium project (Germany).

<sup>58</sup> In line with the European Ombudsman's practice, the Complaints Mechanism can make "suggestions for improvement" relating to allegations, to improve good administration regardless of the overall outcome of the complaint.

<sup>59</sup> Some complaints contain multiple allegations, so can have several outcomes. Moreover, the European Ombudsman can make suggestions for improvement irrespective of the overall outcome. Annex III defines the outcomes for European Ombudsman cases.

<sup>60</sup> Based on decisions of inadmissibility as communicated to the Complaints Mechanism.

# ANNEX II – WORK PERFORMED ON HANDLED CASES

Reference number	Subject/project	Project country	Registry date	Assessment	Investigation	Dispute resolution	Site visit(s)	Consultation	Outcome	Suggestions for improvement	Closed during 2024	Follow-up
<b>Access to information</b>												
<a href="#">SG/A/2023/01</a>	Publication of project summaries and associated environmental information	Poland Italy Chile Spain Germany Ireland	12/01/23	•	•			•				
<a href="#">SG/A/2023/02</a>	Disclosure of a Data License Agreement	N/A	27/07/23	•	•			•	Recommendation	•	•	•
<a href="#">SG/A/2024/01</a>	GEMS General Meeting Minutes	N/A	30/04/24	•	•							
<a href="#">SG/A/2024/02</a>	Zero Carbon Lithium	Germany	20/11/24	•	•							
<a href="#">SG/A/2024/03</a>	Oceanloop Sustainable Shrimp Farm (IEU GT2)	Spain	18/12/24	•								
<b>Environmental, social and development impacts of financed projects/operations</b>												
<a href="#">SG/E/2020/02</a>	Nepal Tanahu Hydropower	Nepal	20/02/20	•		•	•					
<a href="#">SG/E/2021/08</a>	Zenata Urban Development	Morocco	31/03/21	•	•		•	•	Recommendation	•	•	•
<a href="#">SG/E/2021/09</a>	PUNE Metro Rail Project	India	31/03/21	•	•	•	•	•	Recommendation	•	•	•
<a href="#">SG/E/2021/10</a>	Nepal Tanahu Hydropower	Nepal	08/06/21	•	•	•	•					
<a href="#">SG/E/2021/11</a>	Nepal Tanahu Hydropower	Nepal	08/06/21	•	•	•	•					
<a href="#">SG/E/2021/21</a>	Bogota Sustainable Transport FL	Colombia	28/10/21	•	•							
<a href="#">SG/E/2022/05</a>	SRWB Water Supply and Sanitation Programme	Malawi	17/03/22	•	•		•	•	Recommendation	•	•	•
<a href="#">SG/E/2022/07</a>	Zenata Urban Development	Morocco	31/03/22	•		•	•					
<a href="#">SG/E/2022/09</a>	Bogota Sustainable Transport FL	Colombia	19/05/22	•	•							
<a href="#">SG/E/2022/11A</a>	Zenata Urban Development	Morocco	27/06/22	•	•		•	•	Recommendation		•	•
<a href="#">SG/E/2022/11C</a>	Zenata Urban Development	Morocco	24/11/22	•	•		•	•	Recommendation		•	•
<a href="#">SG/E/2022/14</a>	Railway Nis-Dimitrovgrad	Serbia	29/09/22	•		•	•					
<a href="#">SG/E/2022/15</a>	Mediterranean Railway Corridor	Spain	13/10/22	•	•			•	No grounds	•	•	•
<a href="#">SG/E/2022/16</a>	Barrage Réservoir de Lom Pangar and Nachtigal Hydropower Plant	Cameroon	13/10/22	•	•	•	•	•	Recommendation		•	•
<a href="#">SG/E/2022/18</a>	Zenata Urban Development	Morocco	27/10/22	•	•		•	•	Recommendation		•	•
<a href="#">SG/E/2022/19</a>	Zenata Urban Development	Morocco	10/11/22	•	•		•	•	Friendly solution		•	
<a href="#">SG/E/2023/04</a>	Zenata Urban Development	Morocco	08/03/23	•	•							
<a href="#">SG/E/2023/05</a>	Zenata Urban Development	Morocco	30/03/23	•	•			•	Friendly solution		•	
<a href="#">SG/E/2023/06</a>	Kafr El Sheikh Waste Water Treatment	Egypt	18/04/23	•	•		•	•	No grounds		•	
<a href="#">SG/E/2023/08</a>	Appui au Secteur de l'eau Potable	Tunisia	04/05/23	•		•	•	•	Friendly solution		•	
<a href="#">SG/E/2023/10</a>	Zenata Urban Development	Morocco	17/05/23	•	•		•	•	Recommendation		•	•
<a href="#">SG/E/2023/11</a>	Zenata Urban Development	Morocco	05/06/23	•	•		•	•	Recommendation		•	•
<a href="#">SG/E/2023/13</a>	Zenata Urban Development	Morocco	20/06/23	•	•		•	•	Recommendation		•	•
<a href="#">SG/E/2023/14</a>	Zenata Urban Development	Morocco	05/07/23	•	•		•	•	Recommendation		•	•
<a href="#">SG/E/2023/15</a>	Zenata Urban Development	Morocco	05/07/23	•	•		•	•	Recommendation		•	•
<a href="#">SG/E/2023/16</a>	Zenata Urban Development	Morocco	05/07/23	•	•		•	•	Recommendation		•	•
<a href="#">SG/E/2023/17</a>	Malawi M1 Road Rehabilitation	Malawi	20/07/23	•				•	Friendly solution		•	
<a href="#">SG/E/2023/19</a>	Zenata Urban Development	Morocco	02/08/23	•	•		•	•	Recommendation		•	•
<a href="#">SG/E/2023/21</a>	Metro de Madrid Line 11 Extension	Spain	19/09/23	•	•							
<a href="#">SG/E/2023/22</a>	Zenata Urban Development	Morocco	19/09/23	•	•		•	•	Recommendation		•	•
<a href="#">SG/E/2023/23</a>	Zenata Urban Development	Morocco	19/09/23	•	•		•	•	Recommendation		•	•
<a href="#">SG/E/2023/24</a>	Zenata Urban Development	Morocco	19/09/23	•	•			•	No grounds		•	
<a href="#">SG/E/2023/25</a>	Zenata Urban Development	Morocco	23/10/23	•	•			•	No further inquiry needed		•	
<a href="#">SG/E/2023/26</a>	Flood Protection Measures	Greece	30/11/23	•	•		•					
<a href="#">SG/E/2023/27</a>	Keflavik Airport Extension	Iceland	07/12/23	•	•			•	No grounds		•	
<a href="#">SG/E/2023/28</a>	Bolivia Mi Agua Water and Sanitation	Bolivia	07/12/23	•	•							
<a href="#">SG/E/2023/29</a>	Zenata Urban Development	Morocco	14/12/23	•	•			•	No further inquiry needed		•	

Reference number	Subject/project	Project country	Registry date	Assessment	Investigation	Dispute resolution	Site visit(s)	Consultation	Outcome	Suggestions for improvement	Closed during 2024	Follow-up
<a href="#">SG/E/2024/01</a>	Corridor Vc Medakovo – Poprikuse	Bosnia and Herzegovina	16/01/24	•	•			•	No grounds		•	
<a href="#">SG/E/2024/03</a>	Poklečani Wind Farm	Bosnia and Herzegovina	08/02/24	•	•							
<a href="#">SG/E/2024/04/PR</a>	Atlas Iberia Re Green Loan	Portugal	22/02/24	•					Prevention		•	
<a href="#">SG/E/2024/05/PR</a>	Zero Carbon Lithium	Germany	06/03/24	•					Prevention		•	
<a href="#">SG/E/2024/06/PR</a>	Tajikistan Completion of Rogun Hydro Power Plant	Tajikistan	06/03/24	•					Prevention		•	
<a href="#">SG/E/2024/07</a>	Malawi NRW Water Efficiency Project	Malawi	06/03/24	•				•	Friendly solution		•	
<a href="#">SG/E/2024/08/PR</a>	Cyprus EU Funds Co-Financing 2021-2027	Cyprus	06/03/24	•					Prevention		•	
<a href="#">SG/E/2024/09</a>	Zenata Urban Development	Morocco	25/03/24	•								
<a href="#">SG/E/2024/10</a>	Regional Mombasa Port Access Road	Kenya	25/03/24	•	•			•	Friendly solution		•	
<a href="#">SG/E/2024/11</a>	Corridor Vc Medakovo – Poprikuse	Bosnia and Herzegovina	17/04/24	•								
<a href="#">SG/E/2024/12/PR</a>	Zero Carbon Lithium	Germany	17/04/24	•					Prevention		•	
<a href="#">SG/E/2024/13/PR</a>	Zero Carbon Lithium	Germany	17/04/24	•					Prevention		•	
<a href="#">SG/E/2024/14/PR</a>	Zero Carbon Lithium	Germany	17/04/24	•					Prevention		•	
<a href="#">SG/E/2024/15/PR</a>	Zero Carbon Lithium	Germany	17/04/24	•					Prevention		•	
<a href="#">SG/E/2024/16</a>	Corridor Vc Medakovo – Poprikuse	Bosnia and Herzegovina	30/04/24	•		•						
<a href="#">SG/E/2024/17</a>	Zenata Urban Development	Morocco	30/05/24	•	•		•					
<a href="#">SG/E/2024/18</a>	Zenata Urban Development	Morocco	30/05/24	•	•		•					
<a href="#">SG/E/2024/19/PR</a>	High Speed Rail Line Porto-Lisboa – Phase 1	Portugal	20/06/24	•					Prevention		•	
<a href="#">SG/E/2024/20/PR</a>	Zero Carbon Lithium	Germany	20/06/24	•					Prevention		•	
<a href="#">SG/E/2024/21</a>	Kanpur Metro Project and Agra Metro Rail Project	India	04/07/24	•	•							
<a href="#">SG/E/2024/22</a>	X4 (part of the Modernisation Routière II)	Tunisia	04/07/24	•			•					
<a href="#">SG/E/2024/24</a>	Flood Protection Measures	Greece	17/07/24	•	•							
<a href="#">SG/E/2024/25</a>	Poklečani Wind Farm	Bosnia and Herzegovina	17/07/24	•	•							
<a href="#">SG/E/2024/26</a>	Zenata Urban Development	Morocco	26/07/24	•	•				No further inquiry needed		•	
<a href="#">SG/E/2024/27</a>	Greater Colombo Wastewater	Sri Lanka	06/08/24	•		•	•					
<a href="#">SG/E/2024/28</a>	Algeti – Sadakhlo Road	Georgia	06/08/24	•		•	•					
<a href="#">SG/E/2024/29</a>	Lana River Front – Urban Development	Albania	27/08/24	•								
<a href="#">SG/E/2024/30</a>	E-80 Highway Nis-Merdare Phase 1	Serbia	26/09/24	•								
<a href="#">SG/E/2024/31</a>	Brownfields 3	France	12/12/24	•								
<a href="#">SG/E/2024/32</a>	East Africa Clean Cooking Expansion	Kenya	18/12/24	•								

#### Own governance/administration, including own procurement

<a href="#">SG/G/2023/06</a>	Call for Expression of Interest	N/A	20/06/23	•	•			•	No grounds		•	
<a href="#">SG/G/2023/07</a>	Call for Expression of Interest	N/A	20/06/23	•	•			•	No grounds		•	
<a href="#">SG/G/2024/01</a>	EIB Website Technical Issue	N/A	17/07/24	•	•			•	Friendly solution		•	

#### Human resources

<a href="#">SG/H/2023/06</a>	Unfair selection process EIB position	N/A	19/12/23	•	•			•	No grounds		•	
<a href="#">SG/H/2023/07</a>	Unfair selection process EIB position	N/A	19/12/23	•	•			•	No grounds		•	
<a href="#">SG/H/2024/01</a>	Unfair rejection of applications	N/A	22/02/24	•	•				No grounds		•	
<a href="#">SG/H/2024/02</a>	Unfair selection process	N/A	06/03/24	•	•			•	No grounds		•	
<a href="#">SG/H/2024/03</a>	Application Website	N/A	17/04/24	•	•				Friendly solution		•	
<a href="#">SG/H/2024/04</a>	Unfair rejection of application	N/A	20/06/24	•	•							

#### Inadmissible complaints

<a href="#">SG/E/2024/02</a>	Container Terminal Extension	Spain	29/01/24	•					Inadmissible		•	
<a href="#">SG/E/2024/23</a>	Corridor Vc Medakovo – Poprikuse	Bosnia and Herzegovina	17/07/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/01</a>	Lucknow Metro Rail Project	India	16/01/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/02</a>	Loan rejection	France	08/02/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/03</a>	Miscellaneous	India	22/02/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/04</a>	Challenging EIB decision to finance hospitals	Romania	25/03/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/05</a>	Credit card fees	Germany	17/04/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/06</a>	AVE Cordoba Malaga-Priority Ten	Spain	17/04/24	•					Inadmissible		•	

Reference number	Subject/project	Project country	Registry date	Assessment	Investigation	Dispute resolution	Site visit(s)	Consultation	Outcome	Suggestions for improvement	Closed during 2024	Follow-up
<a href="#">SG/INA/2024/07</a>	Jiji Mulembwe Hydropower Burundi	Burundi	30/04/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/08</a>	Zenata Urban Development	Morocco	15/05/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/09</a>	Zenata Urban Development	Morocco	30/05/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/10</a>	Inadequate quality of roads	Jordan	30/05/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/11</a>	DG Khan Cement Project	Pakistan	20/06/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/12</a>	S4 Deviation Zarzis	Tunisia	20/06/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/13</a>	Request for EIB finance	Poland	04/07/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/14</a>	Kom Ombo Solar PV	Egypt	06/08/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/15</a>	Kom Ombo Solar PV	Egypt	27/08/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/16</a>	Kom Ombo Solar PV	Egypt	27/08/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/17</a>	HEP-Toplinarstvo	Croatia	27/08/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/18</a>	Bank account administrative issue	Austria	11/09/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/19</a>	Université Euro-Méditerranéenne de Fès (UEMF)	Morocco	26/09/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/20</a>	Zenata Urban Development	Morocco	09/10/24	•					Inadmissible		•	
<a href="#">SG/INA/2024/21</a>	Zenata Urban Development	Morocco	20/11/24	•					Inadmissible		•	

European Investment Fund (EIF)												
<a href="#">EIF/G/2024/01</a>	EIF Call for Expressions of Interest - No. 2024/01	N/A	06/11/24	•	•			•	No grounds		•	
<a href="#">EIF/INA/2024/01</a>	Croatian Venture Capital Initiative	Croatia	17/07/24	•					Inadmissible		•	

Reference number	Subject/project	Project country	Registry date	Allegation	Date decision	Outcome	Suggestions for improvement	Closed during 2024	Follow-up
European Ombudsman									
<a href="#">EO/802/2023/PB</a>	Disabled person's procedure	N/A	12/07/23	The EIB's lack of procedure for recognising a staff member as a disabled person	21/11/24	Closed without further action		•	
<a href="#">EO/347/2024/EM/FTR</a>	Failure to reply to a complaint addressed to IG/CM	Bosnia and Herzegovina	21/02/24	The Complaints Mechanism's failure to reply to a complaint	22/03/24	Settled		•	
<a href="#">EO/1111/2024/EM/FTR</a>	Failure to reply to a complaint addressed to IG/CM	Bosnia and Herzegovina	12/06/24	The Complaints Mechanism's failure to reply to a complaint	11/07/24	Settled		•	
<a href="#">EO/1524/2024/KW</a>	Failure to reply to a complaint about a job application	Germany	06/09/24	The EIB's failure to reply to an e-mail dated 1/08/2024 concerning the deadline to receive a reply	20/09/24	Settled		•	
<a href="#">EO/1899/2024/VB</a>	Failure to reply to concerns about EIB operations with Israeli counterparts	N/A	08/11/24	The EIB's failure to reply to the complainant's concerns about EIB operations with Israeli counterparts as raised in numerous emails that were sent since June 2024	04/12/24	Settled		•	
<a href="#">EO/2036/2024/ACB</a>	Failure to reply to confirmatory request for access to documents	N/A	18/11/24	The EIB's failure to take a final decision on a request for public access to documents concerning its follow-up to investigations by the European Anti-Fraud Office					
<a href="#">EO/2076/2024/VB</a>	Failure to reply to concerns about child allowances	N/A	10/12/24	The EIB's failure to respond to a written request to redress a situation related to family allowances	16/12/24	Settled		•	

# ANNEX III – DEFINITIONS

Work performed	
Assessment	An initial assessment is conducted to clarify the concerns raised by the complainant(s) and to better understand the complainant's allegations and the views of other relevant stakeholders.
Investigation <sup>61</sup>	<p>The investigation enables the EIB Complaints Mechanism to form an independent and reasoned opinion about the issues raised in the complaint. It aims to determine whether:</p> <ul style="list-style-type: none"> <li>the complaint points to a failure to comply with relevant EIB provisions;</li> <li>outcomes are consistent with the desired effects of the EIB provisions;</li> <li>EIB provisions are adequate to handle the issues raised by the complaint.</li> </ul>
Collaborative resolution process <sup>62</sup>	A process facilitated by the EIB Complaints Mechanism to resolve the dispute with the active involvement of the complainants and other key stakeholders such as project promoters. The process seeks to identify sustainable solutions by building understanding and trust among the parties.
Site visit(s)	Fact-finding visits and/or investigation visits by the EIB Complaints Mechanism to the project location, often in cooperation/collaboration with the EIB services concerned.
Consultation	Consultation on the draft conclusions report or dispute resolution report with EIB services and directors general.
Follow-up	Follow-up by the EIB Complaints Mechanism on further developments and implementation of recommendations and/or suggestions for improvement, accepted by the EIB and regarding the subject under complaint.
Outcomes – European Ombudsman	
Recommendation	Following an inquiry or the refusal by the EIB Group to implement a solution proposed by the European Ombudsman, the Ombudsman issues a decision of maladministration.
No maladministration	Following an inquiry, the European Ombudsman considers that there was no instance of maladministration.
Settled	The EIB Group agrees to implement a solution proposed by the European Ombudsman or otherwise address the complainant's concerns.
Closed without further action	The European Ombudsman decides to close the case without further action (for example, because the issues raised are or have been the subject of legal proceedings).
Insufficient grounds to open an inquiry	The European Ombudsman does not consider it appropriate or necessary to carry out further inquiries (for example, because of the arguments presented in a complaint or because of the information provided by the EIB Group).
Withdrawn by the complainant	After filing the complaint with the European Ombudsman, the complainant voluntarily withdraws it.
Inadmissible	The case does not meet the admissibility criteria and is dismissed.
Suggestions for improvement	Although no maladministration is found, the European Ombudsman recommends that the EIB Group takes one or more specific actions to foster good administration.

61. [www.eib.org/en/about/accountability/complaints/investigation/index.htm](http://www.eib.org/en/about/accountability/complaints/investigation/index.htm)

62. <https://www.eib.org/en/readonline-publications/eib-group-dispute-resolution.htm>

Outcomes – Complaints Mechanism	
Recommendation	Allegations are grounded (for example, a finding of maladministration) and the complaint is closed with one or more recommendations to EIB Group management and/or the EIF chief executive/deputy chief executive for corrective action(s) and/or improvement of existing EIB policies or procedures.
Friendly solution	Allegations are addressed during the complaints-handling process and/or in a collaborative resolution process. The problem is solved and/or the dispute is settled.
No grounds	Allegations are found ungrounded.
Prevention <sup>63</sup>	In specific and well-defined cases, EIB Group services are given the opportunity to address the complainant's allegations, supported by the EIB Complaints Mechanism.
Dropped by the complainant	The complaint is dropped by the complainant during the complaints-handling process. No further action is required.
Financing request dropped by the promoter	The promoter/intermediary drops its request for EIB Group financial assistance for the project or component in question during the complaints-handling process. No further action is required.
Financing withdrawn by the EIB Group	The EIB Group withdraws financial assistance for the project or component in question. No further action is required.
No further inquiry needed	The Complaints Mechanism does not consider that there are sufficient grounds to carry out further inquiries.
Inadmissible	The allegations do not relate to a decision, action or omission by the EIB Group and/or are listed as inadmissible complaints.
Suggestions for improvement	The Complaints Mechanism suggests that the EIB Group takes one or more specific actions to foster good administration.

63. The prevention process applies before a decision to finance an operation is made by the EIB Group governing bodies; that is, when maladministration regarding the project's environmental and social impact or governance aspects has not yet occurred (section 3 of the [EIB Group Complaints Mechanism Procedures](#)).





# COMPLAINTS MECHANISM

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