

COMPLAINTS MECHANISM

REPORT 2025



European
Investment Bank | Group

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European Investment Bank Group Complaints Mechanism Report 2025

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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.
You can also contact info@eib.org. Get our e-newsletter at www.eib.org/sign-up.

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THE COMPLAINTS MECHANISM REPORT 2025 presents the key achievements of the Complaints Mechanism of the European Investment Bank (EIB) Group¹ over the past year. In 2025, the Complaints Mechanism continued to strengthen accountability across EIB Group operations by managing a demanding caseload including a growing number of European Ombudsman cases, improving efficiency and further consolidating its monitoring function.

The start of the Complaints Mechanism Policy review marked a major milestone, initiated following an independent external assessment to ensure alignment with evolving international good practices. The Complaints Mechanism also deepened cooperation with peer institutions through the signature of its first accountability agreement and expanded its direct engagement with complainants, project promoters and local stakeholders through missions and in-person meetings.

Monitoring activities progressed with close follow-up on compliance and dispute resolution outcomes, reinforcing transparency across the Complaints Mechanism's work. Outreach remained a cornerstone of the Complaints Mechanism's activities, with events and exchanges organised across various regions to strengthen engagement with civil society organisations, local facilitators and mediators and other accountability mechanisms.

Overall, the report shows how the Complaints Mechanism continued to promote accountability, responsiveness and transparency across the EIB Group.

¹ The EIB Group consists of the EIB and the European Investment Fund (EIF).
For more information about the EIB, see: <https://www.eib.org>.
The EIF provides risk finance for small and medium businesses. For more information about the EIF, see: <https://www.eif.org>.

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“ The Complaints Mechanism stands as a cornerstone for reinforcing trust and accountability, ensuring that stakeholder concerns are addressed with integrity and independence. ”

Monique Koning, Inspector General



“ In 2025, the Complaints Mechanism continued to deliver on its important mandate to ensure compliance with the EIB Group’s environmental and social standards and facilitate the resolution of diverse issues encountered by people and communities. We started the exercise of reviewing our 2018 policy and continued to improve efficiency by reducing overdue cases. ”

Vasco Amaral Cunha, Head of the Complaints Mechanism

2025 HIGHLIGHTS

Review of the COMPLAINTS MECHANISM POLICY started

FIRST ACCOUNTABILITY RELIANCE AGREEMENT with a peer international financial institution

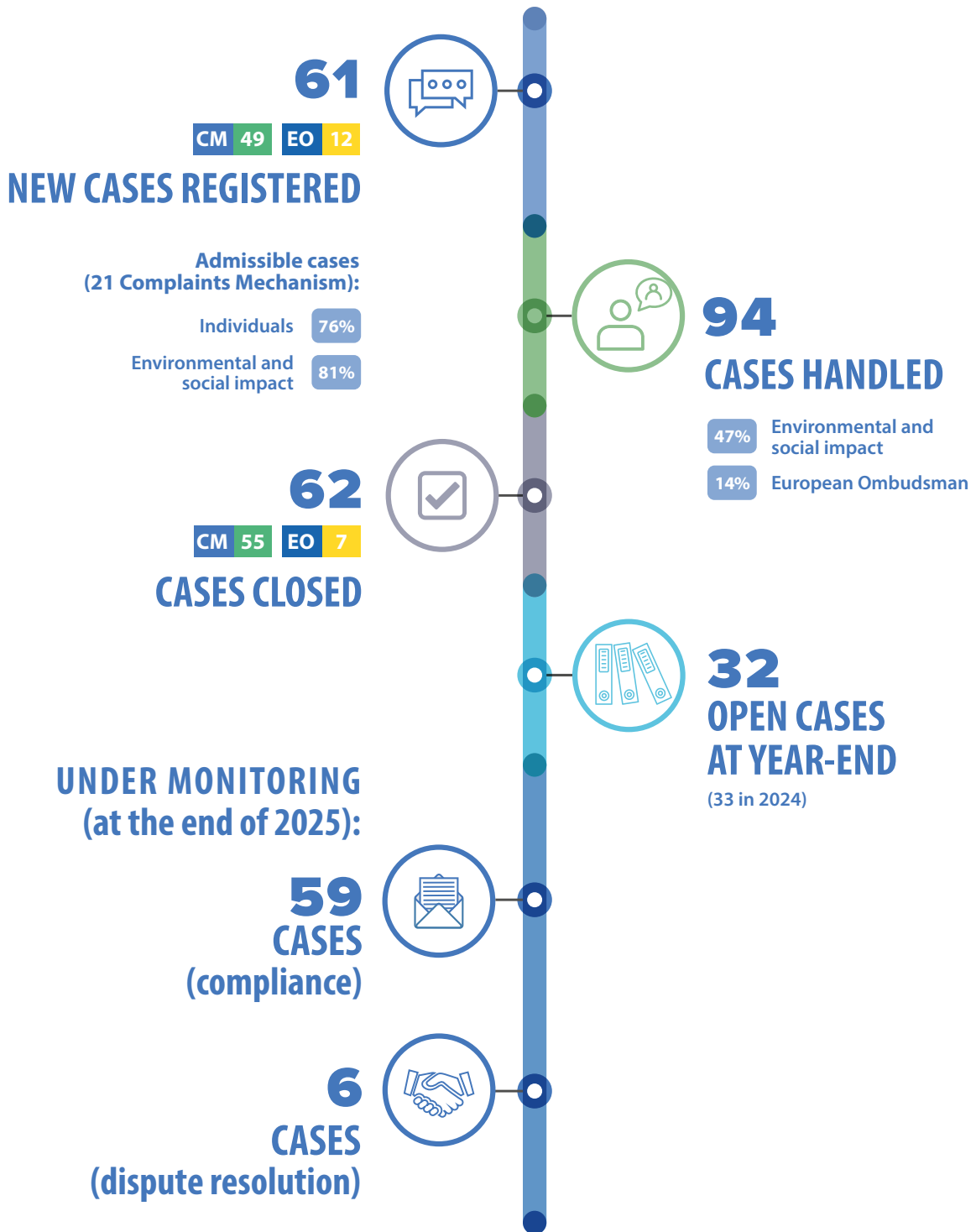
62 cases closed – **LOWEST BACKLOG** since 2018

16 cases led to recommendations and/or suggestions for improvement

Increased use of DISPUTE RESOLUTION **14** cases

Five years of strengthened COMPLIANCE MONITORING

2025 CASES AT A GLANCE



CM: Complaints Mechanism EO: European Ombudsman

ABOUT THE EIB GROUP COMPLAINTS MECHANISM

The Complaints Mechanism is the public accountability tool of the European Investment Bank (EIB) Group.² 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 maladministration³ by the EIB Group, as defined in the EIB Group Complaints Mechanism Policy, in an objective way.⁴ 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 Ombudsman⁵ 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 the 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 issues resolved, the EIB Group Complaints Mechanism is the leading accountability mechanism established by international financial institutions.

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 – and 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 [EIB Group Complaints Mechanism Policy](#). Please note that the policy is undergoing a review, as described in the section titled “[Our results in 2025](#).” Until the review process is completed and the new policy becomes applicable, the 2018 EIB Group Complaints Mechanism Policy remains in force.

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](#). The Complaints Mechanism is the Group's public accountability tool, performing its duties with full independence from the operational departments of the EIB and the European Investment Fund (EIF). It is one of the 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 to 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 to be performed 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 Global⁶ 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 people 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 people.

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 Group Complaints Mechanism as an initial step and the European Ombudsman as a further possible step.⁷ This ensures an extra level of independence and accountability, making the Complaints Mechanism unique among the independent accountability mechanisms of international financial institutions.

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 by the EIB Group**;
- **holds the Bank accountable by enabling its decisions, actions and/or omissions** to be questioned and ensuring a response;
- **provides an impartial process** for resolving disputes, ensuring fair outcomes for parties involved in EIB-financed projects;
- **provides institutional learning** related to the issues investigated and detects potential systemic shortcomings.

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

⁷ In December 2023, the European Ombudsman withdrew from the memorandum of understanding with the EIB. Nevertheless, it continues in its role as a second, independent form of review of the EIB Group's decisions. The European Ombudsman continues handling allegations of maladministration against the EIB Group, including its lending operations beyond the European Union, and investigates complaints from non-EU complainants if there are grounds to do so.

OUR APPROACH

We listen to people's concerns about an EIB Group project or activity, 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.

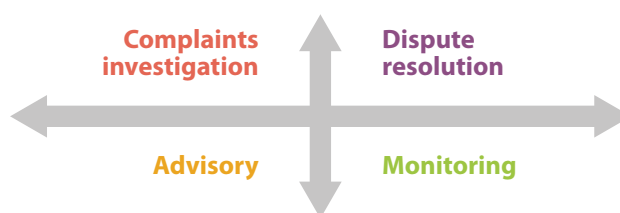
Our reports are usually publicly available – unless a complainant requests confidentiality – and provide information on the way the EIB Group operates and implements its policies.



OUR CORE FUNCTIONS

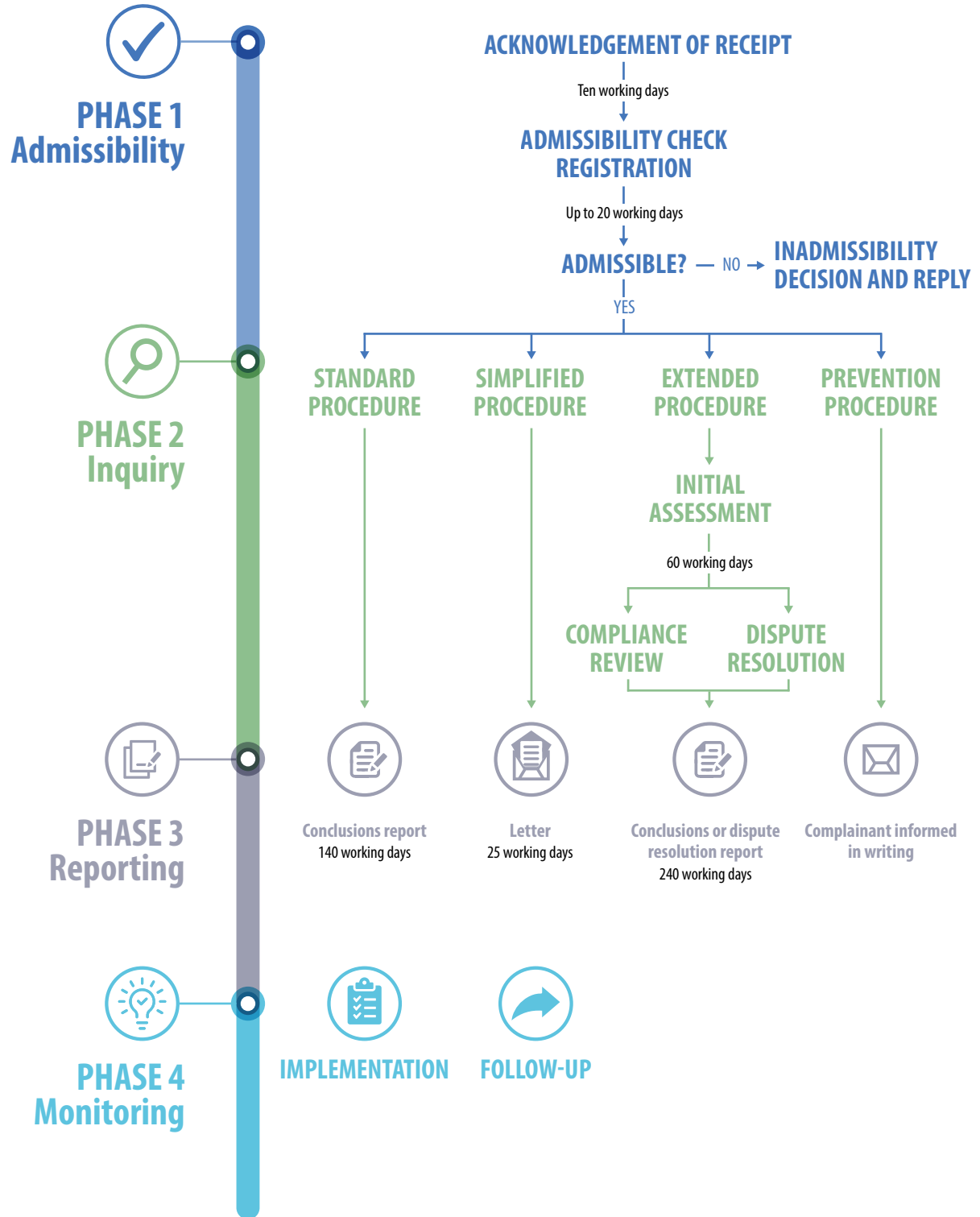
The Complaints Mechanism has four functions:

- **investigate complaints** against the EIB Group;
- **facilitate dispute resolution processes**⁸ 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 in the context of closed complaints, including agreements reached through mediation, as well as the EIB Group's response to its advisory initiatives.



⁸ For more details, see: [About the dispute resolution work of the Complaints Mechanism of the EIB Group](#).

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 [complaints form](#).⁹

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 with 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.¹⁰

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 facilitation of 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 will generally be documented together 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 the 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 from 11 different nationalities and covers 19 languages (as of the end of 2025), has professional experience in law, the environment, human rights, governance, project operations, human resources, standards of the EIB Group and of other international financial institutions, and communication.

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

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



The Complaints Mechanism team in Luxembourg in April 2026.

OUR COLLABORATION WITH THE GLOBAL ACCOUNTABILITY NETWORK

The Complaints Mechanism is a long-standing 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 and participate in working groups dealing with topics of common interest, such as reprisals or dispute resolution.¹¹

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 or 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 (including those of the Complaints Mechanism).

¹¹ For more details about our collaboration with accountability mechanisms of other international financial institutions, please consult the sections titled "[Our results in 2025](#)" and "[Outreach and other activities](#)."

OUR RESULTS IN 2025

2025 marked a pivotal year for the Complaints Mechanism, with the start of a comprehensive review of our policy. The aim is to sharpen our mandate, improve efficiency and accountability and ensure closer alignment with international good practices in accountability. Another major milestone was the signing of the first-ever accountability agreement in the context of mutual reliance between international financial institutions.

Throughout the year, the Complaints Mechanism maintained a strong performance. We continued to deliver on our core mandate of promoting accountability and transparency across EIB Group operations and activities. We handled a high volume of cases, including a growing number of complaints lodged with the European Ombudsman. A key achievement was the reduction of the backlog to historical low levels since the implementation of our current 2018 policy, with the vast majority of long-overdue cases successfully closed. Finally, 2025 marked five years since the introduction of strengthened monitoring of compliance cases, underscoring the consolidation of the monitoring function.

THE COMPLAINTS MECHANISM POLICY REVIEW

2025 saw the start of a review of the current EIB Group Complaints Mechanism [Policy](#) and [Procedures](#). An independent panel of experts carried out an in-depth assessment of the way the Complaints Mechanism delivers on its mandate and recommended that its policy and procedures be reviewed. Based on these recommendations, we prepared a draft of the new policy, which also reflects feedback from representatives of relevant EIB Group services and exchanges with civil society organisations and other stakeholders. The draft new policy aims to improve the handling of project-related concerns by focusing on resolving complaints and facilitating access to remedy in relation to negative environmental and social impacts of EIB Group-financed projects. It also maintains the mandate to resolve complaints related to access to information. The draft new policy clarifies and streamlines the complaints-handling process, making it more efficient and inclusive, and ensures closer alignment with international best practices on accountability and transparency.

In 2026, we plan to carry out an extensive consultation with civil society organisations and other stakeholders before finalising the new policy and submitting it to the EIB Group's governing bodies for approval.¹²

¹² For more details about the public consultation, see: [Consultation on the draft new policy of the EIB Group Complaints Mechanism – European Investment Bank – Citizen Space](#).

FIRST-EVER ACCOUNTABILITY AGREEMENT SIGNED

In July 2025, the Complaints Mechanism and the Independent Project Accountability Mechanism of the European Bank for Reconstruction and Development (EBRD-IPAM) signed an [Agreement on Accountability Arrangements Concerning the Mutual Reliance Projects](#) under the mutual reliance framework established between the EIB and the EBRD. It is the first agreement of its kind between the Complaints Mechanism and another accountability mechanism.

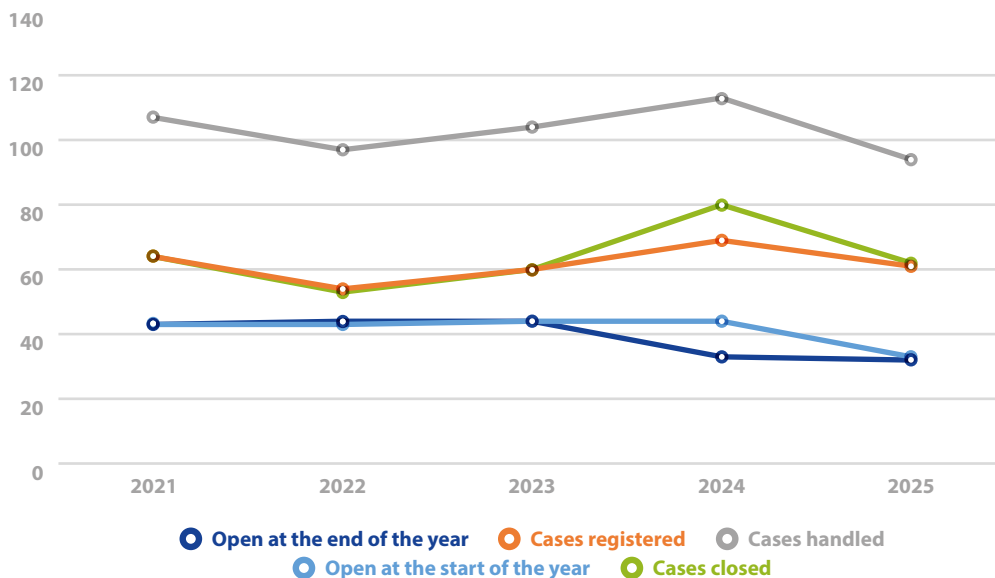
This agreement sets out how both mechanisms will work together when handling complaints concerning mutual reliance projects. Mutual reliance projects are those for which the EIB and the EBRD intend to fully rely on each other's environmental and social policy and standards, due diligence and project monitoring, to the extent that these are aligned. In this context, it was important for us to ensure there would be no dilution of complainants' rights, while ensuring good collaboration between the accountability mechanisms of the EIB Group and the EBRD.

The agreement recognises the need to protect complainants from retaliation and ensures full compliance with confidentiality and data protection rules.¹³

GENERAL OVERVIEW OF CASELOAD AND OTHER ACTIVITIES

We handled 94 cases and closed 62 of them in 2025. The number of open cases at the end of 2025 remained essentially unchanged at 32 (33 in 2024).

Figure 2: Number of complaints received, handled and closed by the Complaints Mechanism since 2021



The number of new cases registered slightly decreased to 61 in 2025, from 69 in 2024. However, this falls within the usual annual range (average of 62 new cases between 2021 and 2024).

¹³ Read online: [EIB Group and EBRD sign agreement on accountability arrangements concerning mutual reliance projects](#).

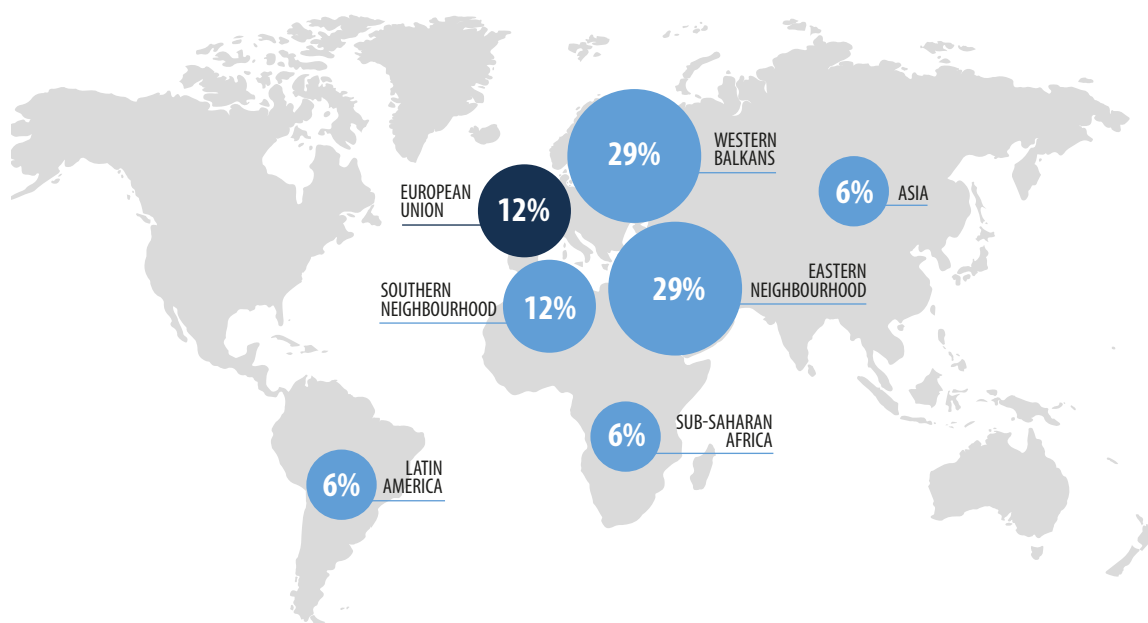
Of the 49 new complaints submitted directly to the Complaints Mechanism in 2025,¹⁴ 21 were registered as admissible. Most admissible complaints (81% in 2025) related to the environmental and social impacts of EIB-financed projects.

All complaints submitted directly to the Complaints Mechanism concerned EIB activities, except one that related to EIF activities.¹⁵

As in previous years, the new admissible complaints were primarily submitted by individuals (76%), followed by civil society organisations (14%), with both groups focusing their allegations on the environmental and social impacts of EIB-financed projects.

New admissible complaints were predominantly related to EIB-financed projects (17 out of 21). The most common concerns raised were the negative impacts of projects on housing and land, living conditions and livelihoods (mostly related to resettlement) as well as inadequate stakeholder engagement. These have been recurring themes, reflecting the nature of many EIB investments (large-scale and complex infrastructure projects). Other issues included pollution, public health and safety and working conditions. Regionally, most new admissible project-related complaints concerned projects beyond the European Union (88%), which was the case in previous years as well.

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



Transport continues to be the sector with the highest number of new admissible project-related complaints (76%), followed by construction (6%), energy (6%), financial and insurance activities (6%) and waste and water (6%).

We handled 31 cases through compliance and 14 cases through dispute resolution. In addition to one case that was closed at the initial assessment phase,¹⁶ we closed 21 cases following a compliance review and five

¹⁴ Note that 12 of the 61 new complaints in 2025 were complaints against the EIB Group's 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.

¹⁵ In 2025, we registered a complaint (EIF/E/2025/01) alleging inadequate governance in companies that the EIF finances. As of the end of 2025, the case was under initial assessment.

¹⁶ [SG/E/2025/07](#) Regional Mombasa Port Access Road.

cases after facilitating a dispute resolution process. At year-end, we had 26 open cases,¹⁷ including ten cases under investigation and nine cases undergoing a collaborative resolution process.

Open cases at the end of 2025

26 complaints



In 2025, we monitored the implementation of action points for 72 compliance cases and closed the monitoring process for 13 of them. During the year, we also published the first two compliance monitoring reports, contributing to greater transparency in the implementation of our recommendations. Moreover, we monitored seven dispute resolution agreements and closed the monitoring of one of them.

We handled nearly twice the number of cases lodged with the European Ombudsman – 13 complaints in 2025 compared to seven in 2024 – requiring close coordination with the EIB services and involving inspections by the European Ombudsman’s team. This reflects the increased external scrutiny of the Bank’s operations and actions.

We carried out several site missions and met in person with complainants, promoters and other key stakeholders in Bosnia and Herzegovina, Georgia, Tunisia, Serbia, Slovenia and Sri Lanka.

Outreach remained a priority: We organised several online and in-person events in 2025. These included a jointly hosted webinar with six independent accountability mechanisms to engage with civil society organisations and project-affected communities in Brazil (June 2025). For more details about our outreach activities, please see the section titled “[Outreach and other activities.](#)”

In line with the semi-annual reporting requirement under the Complaints Mechanism Policy, we reported to the EIB Board of Directors in March and September 2025 and to the EIF Board of Directors and the EIF Audit Board in February and September 2025. 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.

For more details about our case-handling work in 2025, please consult [Annex I](#).

¹⁷ In addition, six cases lodged with the European Ombudsman remained open at year-end.

¹⁸ In specific and well-defined cases (before a decision to finance an operation is made by the EIB Group governing bodies), the Complaints Mechanism transfers the complaint to the EIB Group services. More information about the prevention procedure can be found in the [EIB Group Complaints Mechanism Policy](#) (Article 4.2.2) and the [EIB Group Complaints Mechanism Procedures](#) (Article 3).

COMPLAINTS INVESTIGATION FUNCTION

The Complaints Mechanism investigates complaints and evaluates whether the EIB Group has followed the standards, rules and procedures that govern its operations.

In 2025:

31 CASES HANDLED THROUGH A COMPLIANCE REVIEW	21 CASES CLOSED FOLLOWING A COMPLIANCE REVIEW
<p>We handled several project-related cases involving multiple complaints, including:</p> <ul style="list-style-type: none"> • Two complaints concerning the Flood Protection Measures project (Greece); • Three complaints concerning the Bogota Sustainable Transport FL project (Colombia); • Two complaints concerning the Poklečani Wind Farm project (Bosnia and Herzegovina). 	<p>We completed investigations and compliance reviews for 21 cases spanning a range of sectors, countries and issues. This included issuing:</p> <ul style="list-style-type: none"> • 13 conclusions reports covering 16 cases (including two reports that covered five cases with similar allegations); • Five conclusions letters (simplified procedure).
<p>We had ten cases undergoing a compliance review at year-end, in which we made significant progress, including:</p> <ul style="list-style-type: none"> • Bogota Sustainable Transport FL (Colombia); • Flood Protection Measures (Greece); • Nepal Tanahu Hydropower (Nepal).¹⁹ 	<p>In addition to five access to information cases, we closed several complex cases that were registered in 2022 and 2023, including:</p> <ul style="list-style-type: none"> • Bolivia Mi Agua Water and Sanitation (Bolivia); • Metro de Madrid Line 11 Extension (Spain); • Zenata Urban Development (Morocco) – all open cases related to this project were closed in 2025.

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

¹⁹ This investigation began only after the dispute resolution process (initiated in 2021) concluded in August 2024.

DISPUTE RESOLUTION FUNCTION

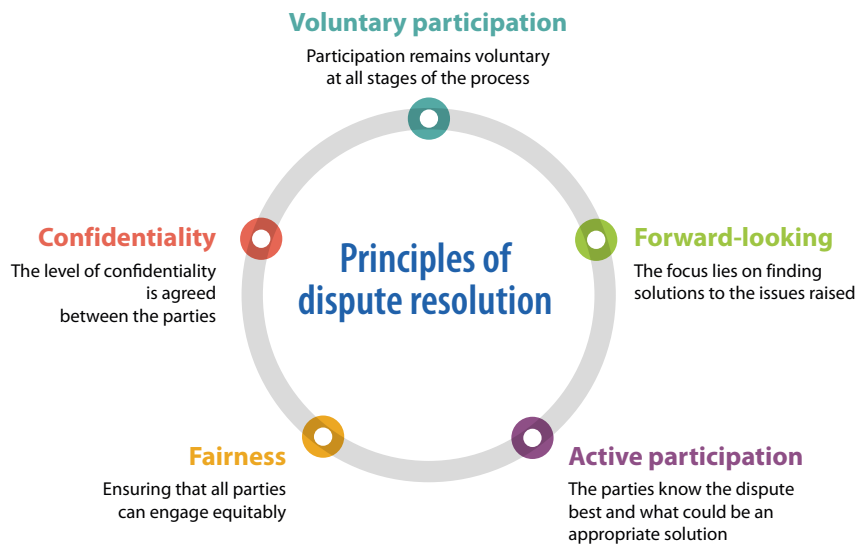
Over the last few years, we have dealt with an increasing number of cases through dispute resolution. In 2025, we handled 14 cases through dispute resolution (11 in 2024 and nine in 2023), highlighting the growing importance of this function.

14 DISPUTE RESOLUTION PROCESSES HANDLED (14 CASES)	13 NEW CASES ANALYSED FOR DISPUTE RESOLUTION POTENTIAL
5 DISPUTE RESOLUTION PROCESSES CLOSED	9 DISPUTE RESOLUTION PROCESSES OPEN
<ul style="list-style-type: none"> • Algeti–Sadakhlo Road (Georgia) • Greater Colombo Wastewater (Sri Lanka) • X4 Modernisation Routière II (Tunisia) • Railway Niš Dimitrovgrad (Serbia) • Zenata Urban Development (Morocco) <p>Four of these were closed successfully with an agreement.</p>	<ul style="list-style-type: none"> • Corridor Vc Medakovo–Poprikuše (Bosnia and Herzegovina) (three cases) • Algeti–Sadakhlo Road (Georgia) • Autoroute du Centre (Tunisia) • Divaca–Koper Second Rail Track (Slovenia) • E–60 Ubisa–Shorapani Section F3 (Georgia) • E–60 Rustavi–Red Bridge Section (Georgia) • Nepal Tanahu Hydropower (Nepal)

The Complaints Mechanism's dispute resolution team 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.²⁰

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

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 colleagues in the compliance review function during the initial assessment phase. In one case in 2025,²¹ this close collaboration resulted in an early resolution of the complaint and the closing of this case during the initial assessment phase.

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

The role of civil society organisation advisors in dispute resolution processes

The dispute resolution processes facilitated by the Complaints Mechanism usually involve communities affected by an EIB-financed project and the promoter of the project. Civil society organisation advisors can play a pivotal role in enabling communities to navigate dispute resolution processes linked to large-scale development projects. The experience from the [Narahenpita neighbourhood in Colombo](#), where a wastewater pumping station was constructed close to people’s homes, illustrates how community advisors can play a critical role in opening an alternative pathway for the resolution of disputes. In this case, residents were confronted with noise, vibration, safety risks and fears of structural damage, yet they had little trust in the project promoter or in institutional channels. Litigation appeared costly, slow and unlikely to address their immediate concerns. By guiding the community towards the EIB Complaints Mechanism’s dispute resolution process, the civil society organisation Policy Pillar helped create a space where residents, government officials and project teams could better understand each other’s constraints, responsibilities and underlying needs.

The advisor’s contribution ranged from clarifying community rights and helping to articulate complaints to carefully managing expectations and identifying realistic, practical improvements that could be achieved through negotiation rather than confrontation. Their role in fostering trust was central in shifting adversarial dynamics towards constructive engagement.

Throughout the five-month process, the advisor’s balance of advocacy and cooperation proved essential. By supporting residents in expressing their concerns directly, without substituting their voice, advisors strengthened community agency and helped ensure that outcomes would be equitable and

²¹ [SG/E/2025/07](#) Regional Mombasa Port Access Road.

sustainable. This approach ultimately allowed the parties to resolve long-standing tensions, agree on concrete solutions – such as adjustments to working hours, temporary relocation for vulnerable households and clearer communication channels – and rebuild working relationships. The Sri Lanka case demonstrates that civil society organisation advisors are not simply intermediaries; they are catalysts who enable communities to participate confidently, overcome mistrust and engage meaningfully with project promoters. Their ability to listen, translate concerns and help uncover shared interests makes dialogue-based dispute resolution not only feasible but transformative, even in challenging environments. For more information, please read [Behind successful dialogue: How community advisers help communities engage and negotiate solutions.](#)

MONITORING FUNCTION

In 2025, we monitored 72 compliance cases and seven agreements resulting from dispute resolution processes. We closed the monitoring of 13 compliance cases and one dispute resolution process.

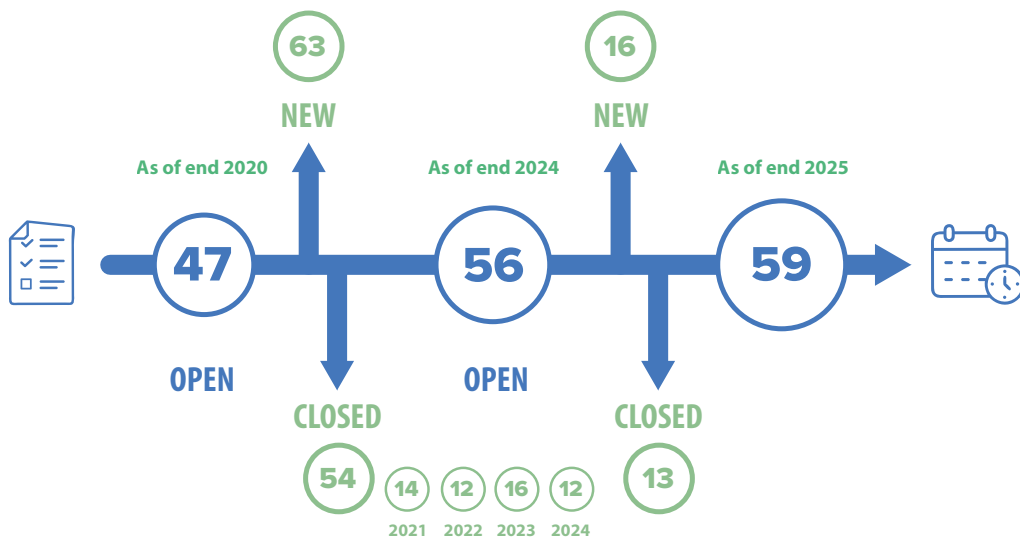
The Complaints Mechanism monitors the implementation of the recommendations and suggestions for improvement (called “action points”) issued in its conclusion reports. It also monitors the implementation of actions agreed by the parties in dispute resolution processes.

Compliance cases

Since the introduction of a **new tool at the end of 2020**, enabling more systematic and consistent monitoring of the implementation of action points issued by the Complaints Mechanism, we **closed the monitoring of 190 action points from 70 compliance cases.**

In 2025, we monitored the implementation of action points for **72 cases** (cases for which the implementation of at least one action point remained open). During the year, we added 16 new cases to our monitoring registry and closed the monitoring process for 13 cases. At the end of 2025, **59 cases remained under monitoring.**²²

Figure 5: Compliance cases under monitoring at year-end (2020, 2024 and 2025)



²² The webpage of a specific case provides information about the case and the timeline of the handling process. It also indicates whether the case is subject to monitoring, and if so, the status of the monitoring process (open/closed and date of closure).

Dispute resolution cases

In 2025, we **closed the monitoring of a dispute resolution process** concerning fruit vendors affected by the [Pune Metro Rail project](#) (India) by issuing a final monitoring report. At the end of 2025, we were **monitoring the implementation of agreements concerning six dispute resolution processes:**

- Kazando–Malawi NRW Water Efficiency (Malawi)
- Pune Metro Rail (India)
- Railway Niš Dimitrovgrad (Serbia)
- Bangalore Metro Rail Project – Line 6 (India)
- X4 Modernisation Routière II (Tunisia)
- Greater Colombo Wastewater (Sri Lanka)

For further details about selected compliance and dispute resolution cases for which monitoring was closed in 2025, please consult the section titled "[Review of selected cases related to EIB activities.](#)"

Five-year anniversary of strengthened compliance monitoring – Key developments, trends and achievements (2020-2025)

Since late 2020, the Complaints Mechanism has significantly strengthened its monitoring function for compliance cases, shifting to a more systematic and proactive approach to ensure that recommendations and suggestions for improvement are effectively implemented. During this period, we steadily reduced the overall number of outstanding action points while strengthening our follow-up on the Bank's commitments both in terms of environmental and social impacts and access to information and transparency.

As per the Complaints Mechanism Policy, our monitoring function aims to follow up on the implementation of recommendations and agreed corrective measures in closed complaints.

Over the past five years, we have expanded and professionalised our monitoring activities so that the outcomes of our compliance reviews lead to concrete and lasting improvements on the ground. Monitoring has become a cornerstone of our work, supporting greater accountability and more transparent progress tracking. With the introduction of a structured monitoring system, we have followed up on corrective measures set out in our conclusions reports, even as the number and complexity of monitored cases and action points increased.

Major improvements to our monitoring function over the past five years

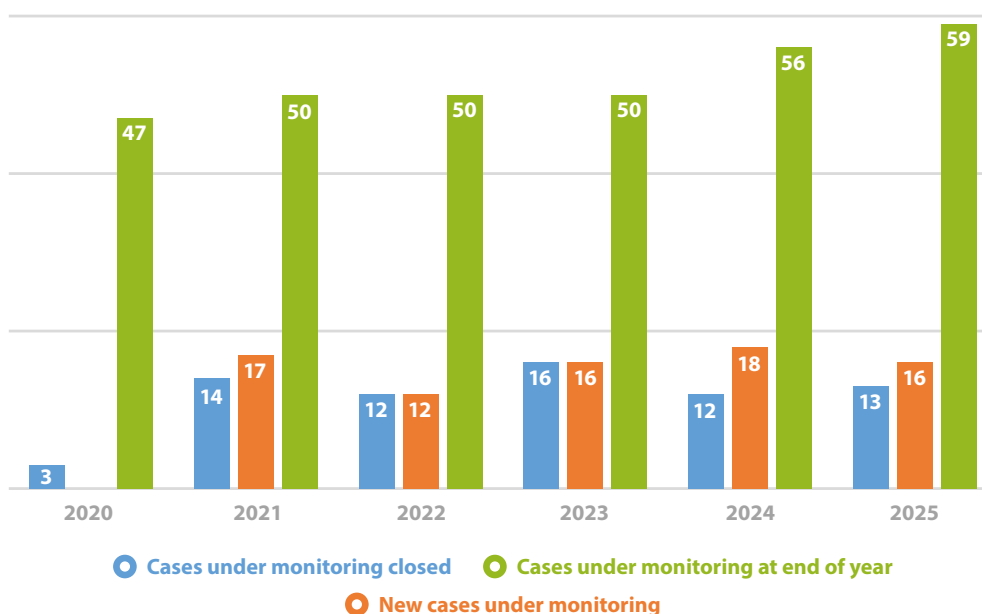
- Development of a structured monitoring system to ensure systematic follow-up with the competent EIB services on the implementation of our action points, including the establishment of a central monitoring registry and, more recently, the development of a more collaborative IT tool to support exchanges and evidence-based reporting.
- Introduction of a formal quarterly review cycle, whereby we systematically request updates and supporting evidence from the relevant EIB services on the implementation status of open action points.
- Regular engagement with key stakeholders (including complainants) to gather their feedback, including the organisation of regular meetings with the relevant EIB services to clarify expectations, roles and responsibilities, discuss implementation challenges and agree on a way forward where delays or differing interpretations arise.

- Introduction of monitoring missions in selective cases with significant or complex compliance issues, leading to the production of dedicated monitoring reports. In 2025, we published two such monitoring reports.²³
- Enhanced transparency of the monitoring function, notably through improved public information provided on the webpage of cases subject to monitoring (including monitoring status, progress updates and closure dates) and more detailed reporting in our activity and annual reports.

Evolution of the monitoring portfolio at case level (2020-2025)

Between 2020 and 2025, the number of open cases and action points under monitoring initially grew, reflecting the adoption of a more systematic monitoring system. Annual inflows typically ranged from 12 to 18 new cases, while annual outflows consistently kept pace, with closure levels between 12 and 16 cases per year.

Figure 6: Compliance cases under monitoring at year-end between 2020 and 2025



When the monitoring system was introduced in the last quarter of 2020, we registered **47 cases under monitoring at year-end**, marking the baseline year for structured monitoring.

In 2021, 2022 and 2023, the monitoring caseload remained stable, at 50 cases with open action points requiring monitoring, despite a high volume of monitoring closures (45 cumulative closures since 2020).

In 2024 and 2025, the monitoring portfolio **rose to 56 and 59 compliance cases**, respectively. This is partly due to a large number of cases related to the Zenata Urban Development project (Morocco), which was added to the monitoring registry (19 cases in total across both years, many with the same action points). As a complex project, it requires long-term monitoring. An on-site monitoring mission took place in 2024 and the corresponding [monitoring report](#) (in French) was published at the beginning of 2025.

In addition to the Zenata Urban Development project, we have other complex infrastructure projects with cases under active monitoring that generated a high number of action points requiring long-term

²³ [SG/E/2021/08](#) Zenata Urban Development monitoring report; [SG/E/2018/39](#) Nepal Power System Expansion monitoring report.

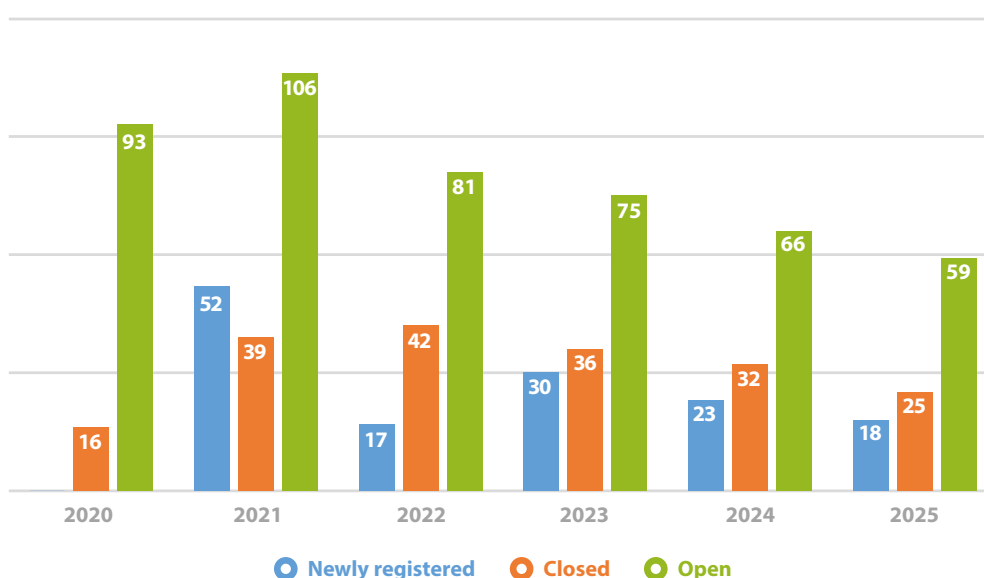
monitoring. The [Nepal Power System Expansion](#) (Nepal) and the [Regional Mombasa Port Access Road](#) (Kenya) provide good examples.

Overall, the five-year trend shows a gradual increase in the volume of monitoring cases, even though we closed the monitoring of 12 to 16 compliance cases per year between 2021 and 2025.

Evolution of the monitoring portfolio at the action point level (2020-2025)

Despite the rise in the number of cases under monitoring,²⁴ the monitoring portfolio of action points **significantly decreased from 106 action points in 2021 to 59 action points in 2025**. Action points, whether recommendations or suggestions for improvement, form the core of the monitoring process.

Figure 7: Action points of compliance cases under monitoring at year-end between 2020 and 2025



Since late 2020, the Complaints Mechanism has played an active and sustained role in reducing the number of outstanding action points at year-end. Each year, between 25 and 42 action points were successfully implemented and closed. These included action points related to:

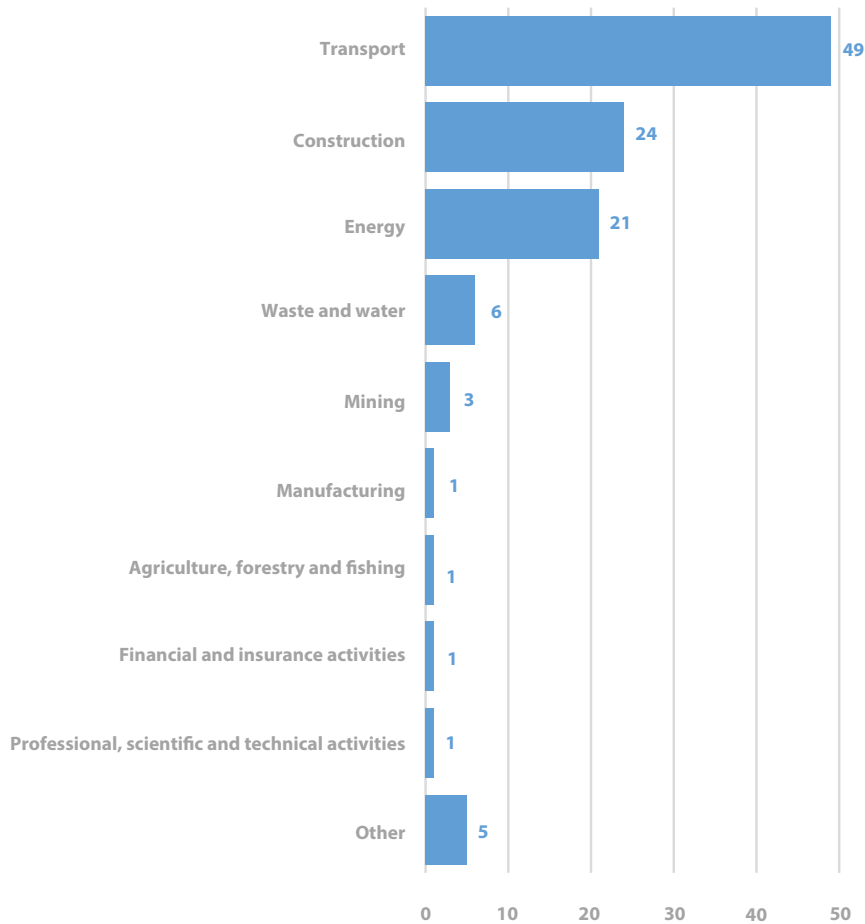
- improvements in project-level grievance mechanisms;
- updated environmental and/or social documentation;
- development of corrective measures for resettlement and livelihood restoration;
- better disclosure practices.

As a result of our sustained efforts in strengthening internal coordination within the Complaints Mechanism and across the Bank, ensuring the systematic tracking of progress and encouraging continuous dialogue with project promoters, the stock of open action points has steadily declined year after year, reaching its lowest level in 2025 since the system was established.

²⁴ As mentioned above, this is partly due to the inclusion of a high number of cases related to the Zenata Urban Development project in the monitoring registry, with many of these cases having the same action points.

Thematic and geographic concentration

Figure 8: Project-related compliance cases under monitoring by sector

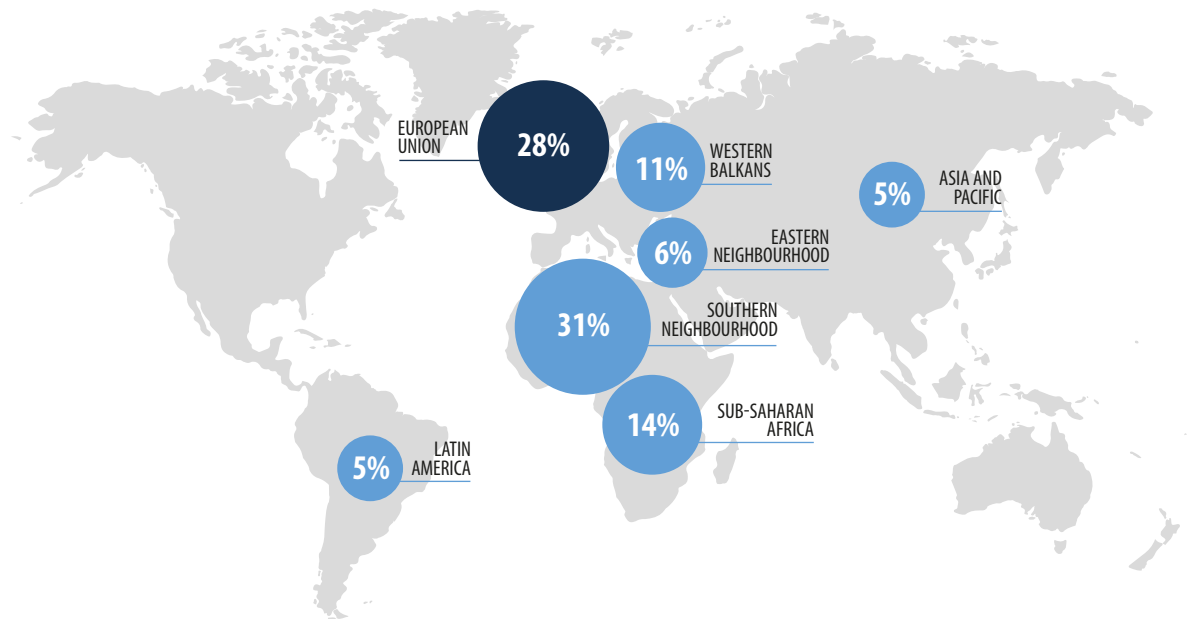


Among the 129 compliance cases monitored since the monitoring system was established, 112 are project-related. Monitored compliance cases are predominantly associated with infrastructure-related sectors, especially transport and energy. Transport alone accounts for by far the largest share. This concentration reflects the scale, complexity and risk profile of large infrastructure projects, which are more likely to generate significant environmental and social impacts and, consequently, to attract complaints. We have a large share of project-related cases in the construction sector but these are mainly about the same project, namely the Zenata Urban Development project (19 of the 24 monitored compliance cases in this sector). Other sectors account for a relatively small number of monitored cases.

Monitoring efforts during 2020-2025 focused heavily on a recurring set of complex projects in these dominant sectors. Across all years, the [Zenata Urban Development](#) (Morocco), [Budapest Airport Concession](#) (Hungary), [D4R7 Slovakia PPP](#) (Slovakia), [Nepal Power System Expansion](#) (Nepal), [Akiira Geothermal Power Plant](#) (Kenya), [Regional Mombasa Port Access Road](#) (Kenya), [Pune Metro Rail](#) (India) and several transport projects in the Western Balkans, such as Banja Luka–Doboj and Corridor Vc Mostar South, required repeated monitoring interventions. These projects accounted for a substantial proportion of open action points.

Monitored compliance cases are distributed across all regions. Consistent with trends observed over the years for new admissible project-related complaints, the large majority of monitored compliance cases (72%) concern projects located beyond the European Union.

Figure 9: Project-related compliance cases under monitoring by region



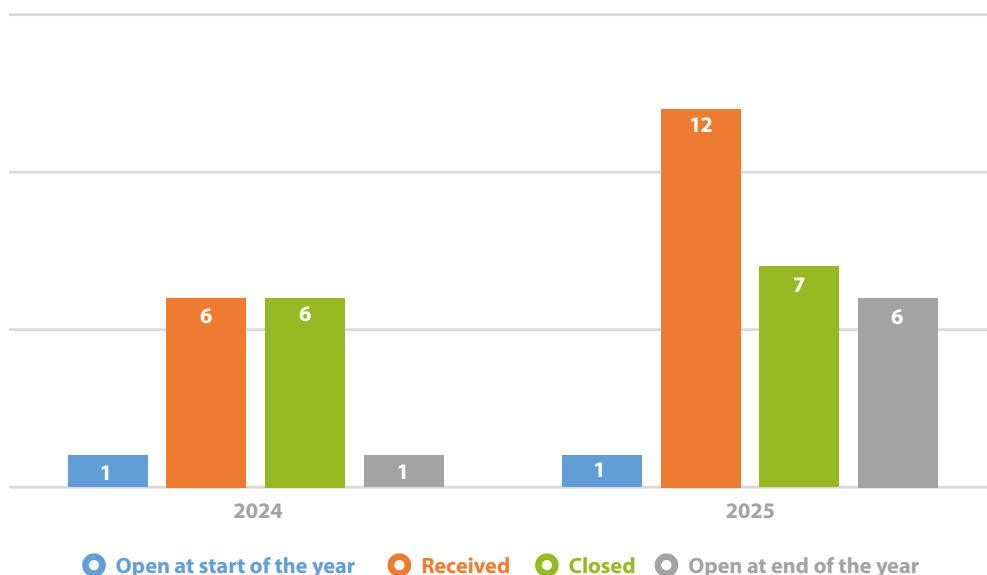
EUROPEAN OMBUDSMAN AND OTHER NON-JUDICIAL REVIEW MECHANISMS

General overview

The Complaints Mechanism deals with complaints lodged with the European Ombudsman against the EIB Group, playing a coordinating role in this process. In 2025, we coordinated the handling of 13 complaints to the European Ombudsman against the EIB Group – a notable rise compared to previous years – and seven of them were closed. For all the closed cases, the European Ombudsman did not find maladministration by the EIB Group.

In 2025, we registered 12 new complaints against EIB Group activities and operations lodged with the European Ombudsman (six in 2024). This may be indicative of heightened external scrutiny, particularly with regard to information disclosure and internal procedures and decisions. Five of these complaints had previously been handled by the Complaints Mechanism or EIB services before being escalated to the European Ombudsman (none in 2024).

Figure 10: Complaints handled by the European Ombudsman



CASES CLOSED	OUTCOME
A case about how the EIB dealt with a request for public access to documents concerning its follow-up to investigations by the European Anti-Fraud Office ²⁵	Settled
A case about how the EIB dealt with a request from a former staff member concerning the handling of allowances following divorce ²⁶	Closed without further action
A case concerning the EIB Complaints Mechanism's failure to reply within its policy deadlines to two complaints related to the Poklečani Wind Farm project in Bosnia and Herzegovina ²⁷	Settled
A case about how the EIB replied to a request for internal review of the EIB Board of Directors' decision approving the financing proposal for the Poklečani Wind Farm project in Bosnia and Herzegovina ²⁸	Closed without further action
A case about how the EIB dealt with a request for public access to documents related to the Poklečani Wind Farm project in Bosnia and Herzegovina ²⁹	Inadmissible
A case concerning the EIB's failure to reply to a request for initiation of the invalidity procedure ³⁰	Settled
A case concerning the EIB's failure to reply to a complaint about a personal data breach within the three months stipulated by its internal rules ³¹	Closed without further action

OPEN CASES
A case about how the EIB addressed environmental and social concerns about a project it financed concerning Budapest Airport ³²
A case about the EIB's refusal to grant public access to documents related to its follow-up to investigations by the European Anti-Fraud Office ³³
A case about how the EIB dealt with concerns about EIB-financed projects involving Israeli entities involved in activities in the occupied territories ³⁴
A case about how the EIB dealt with a request for public access to minutes of a meeting ³⁵
A case about how the EIB dealt with a request for public access to reports on whether the activities of the EIB conform to best banking practice ³⁶
A case about how the EIF handled a complaint concerning the evaluation of a tender and the cancellation of a procurement procedure ³⁷

25 [EO/2036/2024/ACB](#).

26 [EO/2346/2024/VB](#).

27 [EO/679/2025/KW](#). This case is related to [SG/E/2024/03](#) and [SG/E/2024/25](#).

28 [EO/249/2025/SF](#).

29 [EO/1897/2025/SF](#).

30 [EO/2869/2025/IJ/FTIR](#).

31 [EO/3048/2025/RVK](#).

32 [EO/1875/2024/SF](#). This case is related to [SG/E/2020/03](#).

33 [EO/627/2025/SF](#). This case is a follow-up to the European Ombudsman of the EIB reply received following the closure of [EO/2036/2024/ACB](#).

34 [EO/1462/2025/VB](#). This case is related to [SG/INA/2025/07](#). Moreover, the Complaints Mechanism is also currently handling a complaint on the EIB's financing to Israeli companies ([SG/G/2025/01](#)).

35 [EO/01/7/2025/NH](#). This case is related to [SG/A/2024/01](#).

36 [EO/3293/2025/KR](#). This case is related to [SG/A/2025/01](#).

37 [EO/2777/2025/FA](#).

Along with coordinating the 13 cases (12 new received and one ongoing at the start of the year), we also continued to follow up, together with the relevant EIB services, on a suggestion for improvement from the European Ombudsman about the proactive disclosure by the EIB of environmental and social data sheets before the board's approval of loans.³⁸

Other non-judicial review mechanisms

In addition to the European Ombudsman complaints, we also coordinate complaints against the EIB Group's activities 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 2025.



Poklečani Wind Farm

³⁸ 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). More details can be found in the section titled "[Review of selected cases related to EIB activities.](#)"

OUTREACH AND OTHER ACTIVITIES

In 2025, outreach and in-reach remained central to the Complaints Mechanism's efforts to strengthen awareness of its mandate and promote constructive engagement with stakeholders across and beyond the EIB Group. Throughout the year, we continued to participate in exchanges with civil society organisations and enhanced cooperation with peer independent accountability mechanisms, contributing to knowledge sharing and reinforcing collaboration.

Engagement with civil society organisations

Raising awareness about accountability

- **Brazil:** In June 2025, we co-hosted a webinar with six independent accountability mechanisms³⁹ to reach out to civil society organisations and project-affected communities in Brazil and increase their awareness about our work. A recording of the webinar is available in [Portuguese](#).
- **Middle East and North Africa:** In December 2025, we organised an online session in cooperation with [MENA Fem Movement](#) to reach out to civil society organisations in the Middle East and North Africa and increase their awareness about the Complaints Mechanism.

Listening to civil society organisations

- **Luxembourg:** Following the EIB Board of Directors' seminar with civil society organisations in October 2025, we held our annual hybrid meeting with representatives from nine civil society organisations the next day, resulting in an open and constructive exchange.
- **Milan and Washington, DC:** During the Annual Meetings of the Asian Development Bank in Milan (May 2025) and of the International Monetary Fund and the World Bank Group in Washington, DC (October 2025), we participated in several activities focused on accountability, engaging in discussions with civil society representatives and accountability partners to gather valuable feedback concerning our policy review and advance dialogue on accessibility, transparency and remedy for project-affected communities.

Consulting on the agreement on accountability arrangements

In July 2025, the Complaints Mechanism and EBRD-IPAM signed an [Agreement on Accountability Arrangements Concerning the Mutual Reliance Projects](#). In this context and before signature of the agreement, the Complaints Mechanism and EBRD-IPAM organised an online consultation session in June 2025, attended by representatives of several civil society organisations, to present the accountability approach for such complaints and gather feedback from civil society. The final accountability agreement took this feedback into account.

Joining efforts to train diverse stakeholders in effective stakeholder engagement

The Complaints Mechanism partnered with the EIB Environmental, Climate and Social Office to co-organise a workshop designed to strengthen the environmental and social capacities of East African stakeholders.

39 The Office of the Compliance Advisor Ombudsman of the International Finance Corporation and Multilateral Investment Guarantee Agency, the Project-Affected People's Mechanism of the Asian Infrastructure Investment Bank, the Social and Environmental Compliance Unit of the United Nations Development Programme, and the Independent Complaints Mechanism of the Dutch (FMO), German (DEG) and French (Proparco) development banks.

The workshop was held in November 2005 with the support of the EIB Regional Hub for East Africa in Nairobi, Kenya. More than 50 representatives from government, civil society, financial institutions and the private sector participated in discussions on how to ensure that projects are implemented in accordance with the EIB's Environmental and Social Standards in Kenya and the region.

On day one, led by EIB social experts, participants were introduced to the EIB Environmental and Social Sustainability Framework, with a focus on key topics such as involuntary resettlement, livelihood restoration and gender equality.

Day two, organised by the Complaints Mechanism, focused on stakeholder engagement and grievance redress mechanisms in EIB-financed operations. This training emphasised the importance of transparency and accountability in project implementation.



Training on the EIB Environmental and Social Sustainability Framework with a focus on stakeholder engagement (Kenya)

Strengthening dispute resolution capacities

Workshop for mediators (Tunisia)

To support effective dispute resolution, we partner with local facilitators and mediators⁴⁰ who bring essential knowledge of the culture, the languages and the context of each case. We continuously seek to expand our network of facilitators and mediators and regularly collaborate with other independent accountability mechanisms to organise workshops in priority regions, inviting facilitators and mediators to strengthen their skills and connections.

In May 2025, we co-hosted a workshop with 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. The event brought together 14 mediators based in

⁴⁰ Read online: [How we work with local facilitators](#).

the Middle East and North Africa for an in-depth exploration of the unique challenges of mediating disputes in development projects. As part of the workshop, participants conducted role-plays, during which they had to navigate complex situations involving power imbalances, high emotions and negotiation deadlock.

This workshop reinforced our network of facilitators and mediators in the Middle East and North Africa, enhancing capacity to address disputes effectively. For more information about the workshop, please read [EIB Group Complaints Mechanism workshop for mediators in Tunisia](#).

Dispute resolution training (Türkiye and Portugal)

In June 2025, as part of a summer school on land acquisition, resettlement and social sustainability in Istanbul, the Complaints Mechanism delivered a module on effective dispute resolution in development projects. In September 2025, during an advanced training course on social risk and resettlement in Lisbon, we led a session on accountability and grievance management.



Data Harmonisation Initiative workshop (United Kingdom)

Collaboration with other independent accountability mechanisms

Data Harmonisation Initiative (United Kingdom)

In March 2025, we participated in a two-day Data Harmonisation Initiative workshop hosted by the EBRD-IPAM. Together with several independent accountability mechanisms, we have been working since then to create a shared, standardised data set with common definitions. This joint effort aims to improve the comparability of case-related information across independent accountability mechanisms and strengthen the transparency and accessibility of such information for independent accountability mechanisms and external stakeholders.

Strengthening accountability through innovation (Italy)

At the [Annual Conference of the International Association for Impact Assessment](#) in May 2025 in Bologna, we led a session to explore how artificial intelligence and digital tools can support inclusive and ethical accountability processes. This session was organised in collaboration with the independent accountability

mechanisms of the Asian Development Bank and the Inter-American Development Bank. The session attracted a good crowd of more than 70 participants from international financial institutions, independent accountability mechanisms and the academic, corporate and public sectors. For more information about the session, please read [Use of data, technology, and artificial intelligence tools for enhanced accountability](#).



Our session at the Annual Conference of the International Association for Impact Assessment (Italy)



IAMnet Annual Meeting (Barbados)

Sharing knowledge and experience among the independent accountability mechanism network members (Barbados)

In October 2025, we participated in the 22nd Annual Meeting of [IAMnet](#) in Barbados, co-hosted by the Office of the Compliance Advisor Ombudsman of the International Finance Corporation and Multilateral Investment Guarantee Agency; the Caribbean Development Bank's Office of Integrity, Compliance and Accountability; and the Independent Consultation and Investigation Mechanism of the Inter-American Development Bank.

The meeting gathered more than 120 participants, including representatives from 23 mechanisms and over 20 civil society organisations. Discussions focused on key accountability challenges, such as navigating a complex global context, reviewing independent accountability mechanisms policies, addressing climate-related concerns, protecting those who speak up and strengthening effectiveness through data, technology and enhanced collaboration among independent accountability mechanisms.

In-reach across the EIB Group

Among the various internal training and awareness-raising sessions we delivered in 2025, we organised several in-reach events with colleagues from the Projects Directorate who are responsible for the appraisal and monitoring of the projects financed by the EIB. These sessions focused on strengthening collaboration with key EIB services. Discussions centred on lessons learned from past cases and previous interactions, the exchange of good practices, and areas for improvement.

In addition, members of our team participated in training and knowledge-sharing events on various topics, such as artificial intelligence, data protection, dispute resolution, transparency and access to information.



Zenata Urban Development

REVIEW OF SELECTED CASES RELATED TO EIB ACTIVITIES

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

CLOSED CASES

Complaints investigation and dispute resolution functions

ZENATA URBAN DEVELOPMENT	
Region/country:	Southern Neighbourhood/Morocco
Type of complaint:	Environmental/social impact
Sector(s):	Construction
Case webpage (cases closed in 2025):	SG/E/2022/07 , SG/E/2024/09 , SG/E/2023/04 , SG/E/2024/17 , SG/E/2024/18 and SG/E/2025/04

In the last few years, we have been busy handling complaints about the [Zenata Urban Development project](#) in the municipality of Ain Harrouda, located 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 were living in shacks scattered across 17 informal settlements. In 2025, we managed to close all the open cases related to this project.

Since 2020, we have registered 38 cases⁴¹ (complaints submitted by 80 individuals) about the project. The complainants alleged various issues related to the resettlement process, such as (i) long delays between the demolition of their homes and their resettlement in a new apartment; (ii) lack of compensation for the associated transition costs; (iii) issues around eligibility and appropriate compensation, including for project-affected people who married after the cut-off date or project-affected people with informal businesses; (iv) lack of transparency of entitlements/compensation and of the local grievance redress mechanism; and (v) health and safety concerns.

Among the 30 cases declared admissible, we dealt with 29 cases⁴² through compliance, and we facilitated a dispute resolution process for one case.

In 2024, we published two major conclusions reports covering four cases ([SE/E/2021/08](#) and [SG/E/2022/11a, 11c and 18](#)) that addressed most of the issues raised by the complainants. Our compliance review found that the project did not comply with the EIB Environmental and Social Standards and concluded that the EIB had not properly identified or monitored the risks linked to the approach taken by the Moroccan authorities, particularly the application of the national programme “Cities Without Slums,” which was not aligned with the EIB’s standards. We **recommended** that the Bank agree on a corrective action plan with the promoter to ensure the project’s compliance with the standard on involuntary resettlement and that the Bank take all necessary measures under the finance contract to make sure the promoter implements this plan.

We referred to these two major compliance conclusions reports and our recommendations to close all other cases that had raised the same issues.

In 2025, we closed the six remaining cases related to this project:

- One case ([SG/E/2022/07](#)) concerned a family evicted in 2018 without compensation. We facilitated a dispute resolution process between January 2023 and October 2024. Although the local committee offered a preferential half-lot⁴³ to the complainant, no final agreement was reached. We closed the case in February 2025 and **recommended** that the Bank ensure the complainant receives fair compensation and take measures under the finance contract if needed.
- Another case ([SG/E/2024/09](#)) involved a person at risk of eviction, which was resolved through a simplified procedure. We **suggested** to the Bank to monitor future evictions to ensure compliance with the EIB Environmental and Social Standards.
- Three other cases concerned the relocation of businesses. We conducted a compliance review for these three cases and produced a joint conclusions report. One case related to the resettlement of industrial activities ([SG/E/2023/04](#)), which was generally found satisfactory although there was poor documentation. Two cases concerned the resettlement of informal businesses ([SG/E/2024/17](#), [SG/E/2024/18](#)) and revealed restrictive eligibility criteria and missing compensation measures. We found that overall the Bank had not sufficiently monitored the implementation of the resettlement action plan for economic activities. **Our main recommendation** was for the Bank to work closely with the promoter to ensure that the livelihood restoration plan is finalised, properly budgeted, implemented as soon as possible and monitored closely.
- One final case ([SG/E/2025/04](#)) was closed under a simplified procedure as the issues raised had already been addressed in previous compliance reviews. The complainants were informed about the published conclusions reports and our continued monitoring of the implementation of our recommendations.

41 This includes eight cases that were declared inadmissible.

42 Note that many cases were dealt with through a simplified letter, as the complainants raised issues that had already been dealt with in our two major compliance conclusions reports.

43 A preferential half-lot is allocated to people affected by the project, particularly those engaged in informal commercial activities in the area of the project. This entitles them to a commercial space on the ground floor of the building in the resettlement area.

Monitoring

At the end of 2025, we **were monitoring** the implementation of recommendations and suggestions for improvement in 19 cases,⁴⁴ including the finalisation and implementation of the corrective action plan. Following a site visit in 2024, we published a [monitoring report](#) (in French and Arabic) in February 2025, confirming that the corrective action plan represented significant progress but at the same time noting gaps, particularly about compliance with the standard on involuntary resettlement. We reiterated that the plan had to be finalised as soon as possible and supported by a clear budget and implementation criteria.

We are in regular contact with the EIB services to follow up on progress about the corrective action plan, and we intend to publish an updated monitoring report in 2026 to inform the public of progress.

Complaints investigation function

This section presents selected access to information cases as well as environmental and social cases that were dealt with through a compliance review.

Access to information cases

ACCESS TO INFORMATION CASES	
Region/country:	N/A
Type of complaint:	Access to information
Sector(s):	N/A
Case webpage:	SG/A/2023/01 , SG/A/2024/01 , SG/A/2024/03 and SG/A/2025/01

Over the course of 2025, we closed four access to information cases: two relating to the EIB's disclosure of information/documents on its own initiative (proactive disclosure) and two relating to the EIB's release of information/documents upon request from an external stakeholder (reactive disclosure).

While acknowledging that the proactive dissemination of information/documents requires a different degree of assessment by the EIB than that related to reactive disclosure, all cases highlight the continuing challenges surrounding the application of exceptions provided for under Section 5 of the EIB Group Transparency Policy, in particular the reasons put forward for refused access. It is evident from past and present cases (including [SG/A/2018/01](#), [SG/A/2020/01](#), [SG/A/2022/02](#) and [SG/A/2023/02](#)) that the application of the exceptions provided under Section 5 of the policy remains a significant challenge for the relevant EIB services, highlighting the need to raise staff awareness of its requirements.

Our cases included **recommendations and suggestions** to enhance the EIB's proactive and reactive disclosure of information and documents, in line with the EIB Group Transparency Policy and EU case-law on access to documents, with the aim of improving transparency. A consistent and properly justified approach to applying these exceptions is advisable.

⁴⁴ [SG/E/2021/08](#); [SG/E/2022/07](#); [SG/E/2022/11A](#); [SG/E/2022/11C](#); [SG/E/2022/18](#); [SG/E/2023/04](#); [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/2024/09](#); [SG/E/2024/17](#); [SG/E/2024/18](#); [SG/E/2025/04](#).

These observations are underscored by two cases submitted to the European Ombudsman against the EIB ([EO/3/2023/OAM](#) and [EO/2252/2022/OAM](#)), which resulted in **suggestions for improvement** issued to the Bank as well. By the end of the first quarter of 2025, the EIB had completed its comprehensive follow-up on the European Ombudsman’s suggestion for improvement set out in the decision on case EO/2252/2022/OAM. This suggestion concerned the proactive disclosure of the EIB’s draft environmental and social data sheets before the board’s approval of loans. As a result, for high-risk investment loans beyond the European Union whose appraisal commenced after 1 April 2025, the EIB now publishes the draft environmental and social data sheets before the loans are approved by the board.

Moreover, while handling SG/A/2024/03, we noted that some progress has been made, including targeted training for EIB staff and system adjustments, to improve the proactive publication of project information and the use of exceptions under Section 5 of the EIB Group Transparency Policy.

Environmental and social cases

POKLEČANI WIND FARM	
Region/country:	Western Balkans/Bosnia and Herzegovina
Type of complaint:	Environmental/social impact
Sector(s):	Energy
Case webpage:	SG/E/2024/03 and SG/E/2024/25

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 wind farm with a total installed capacity of 132 MW, located in the municipality of Posušje, in the mountainous area of the West Herzegovina Canton in Bosnia and Herzegovina.

The complainant alleged that the project breached 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.



Poklečani Wind Farm

We found that the project complied with the applicable standards, with possibly one minor exception related to the failure to publish a screen-out decision. We closed the cases in June 2025, and we **issued one suggestion for improvement** to the Bank in this respect, which was **implemented promptly**. We also found that the EIB carried out its responsibilities as required. The EIB either requested or agreed with the promoter to carry out additional assessments of the project’s impact and commented on these assessments. The EIB reflected the outcomes of these assessments in an environmental and social action plan⁴⁵ attached to the finance contract, which includes specific measures to be implemented by the promoter. We consider the development of an environmental and social action plan to be good practice, particularly for higher-risk category projects.

In addition to these complaints, the complainant lodged three complaints with the European Ombudsman, all of which were closed without any finding of maladministration attributable to the EIB. The complainant also submitted complaints to the European Commission and requests for access to information to the EIB. Furthermore, a civil society organisation submitted a request for an internal review of the board’s decision to finance this project under the Aarhus Regulation, to which the Bank replied in October 2024.⁴⁶ More recently, the civil society organisation complained to the European Ombudsman about the outcome of the internal review procedure. The case was closed without further action in July 2025.

BOLIVIA MI AGUA WATER AND SANITATION	
Region/country:	Latin America/Bolivia
Type of complaint:	Environmental/social impact
Sector(s):	Water, sewerage
Case webpage:	SG/E/2023/28

In 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 complainant alleged that the project did 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 (Indigenous Peoples); and (iii) violence and retaliation as part of the sub-project implementation.

We found that, although the EIB had identified risks related to the presence of Indigenous Peoples and mitigation measures were planned accordingly, the Bank’s monitoring did not ensure their full implementation. Changes in the project design and community opposition led to the suspension of works, and when activities resumed, broad consent by Indigenous Peoples was still missing.

We closed the case in December 2025, and we **suggested** to the Bank to improve its monitoring of the project going forward and to support the promoter in enhancing its management systems for stakeholder engagement, land acquisition and Indigenous Peoples for future similar programmes.

At the end of 2025, this case was **under monitoring**.

⁴⁵ The environmental and social action plan is a list of specific actions in relation to relevant EIB Environmental and Social Standards, agreed between the EIB and the promoter and to be implemented and reported on by the promoter.

⁴⁶ Available [here](#).

METRO DE MADRID LINE 11 EXTENSION

Region/country:	European Union/Spain
Type of complaint:	Environmental/social impact
Sector(s):	Transport
Case webpage:	SG/E/2023/21

In September 2023, we received a complaint about the [Metro de Madrid Line 11 Extension project](#) from two civil society organisations. The project includes the construction of 7 km of underground metro line, building three new stations and refurbishing two existing stations. The complainants alleged non-compliance with seven of the EIB Environmental and Social Standards.

We found that the project complied with the EIB Environmental and Social Standards. With regard to the role of the EIB, we found that the EIB fulfilled its role as required, with one exception: instead of referring to the national environmental quality assurance plan, the EIB's environmental and social data sheet referred to an environmental and social management plan, a term that has a broader meaning.

We closed the case in December 2025, and **recommended** that the environmental and social data sheet be corrected. We also **suggested** that the environmental and social completion sheet include project-related developments that took place after the EIB appraisal of the project, and we reminded the EIB of its obligation to publish the environmental impact assessment reports.

At the end of 2025, this case was **under monitoring**.



Metro de Madrid Line 11 Extension

EAST AFRICA CLEAN COOKING EXPANSION	
Region/country:	Sub-Saharan Africa/Kenya
Type of complaint:	Environmental/social impact
Sector(s):	Manufacturing
Case webpage:	SG/E/2024/32

In November 2024, we received a complaint about the [East Africa Clean Cooking Expansion project](#), which supports the distribution of clean cooking solutions in several African countries.

The complainant raised allegations of (i) sexual exploitation, abuse and harassment; and (ii) unfair dismissal of employees at Burn Manufacturing Mauritius Ltd.

We found that the company had policies and procedures in place to address these risks and took measures to handle the reported incidents of sexual exploitation, abuse and harassment and unfair dismissal. However, the company did not inform the Bank about such incidents. Our review also showed that the Bank's gender assessment at project appraisal focused on the positive impacts of the project on gender equality and did not consider the potential gender risks, despite the Bank's commitments to progressively roll out such gender risk assessment in its 2016 EIB Gender Strategy and related action plans. This finding is shared by the [independent evaluation](#) of the EIB Group Strategy on Gender Equality and Women's Economic Empowerment. At the time of issuance of our conclusions report, the competent services of the Bank were finalising an action plan to address the recommendations issued in this evaluation, including the recommendation made to the Bank to strengthen its social due diligence guidance and procedures to ensure careful consideration of gender-specific risks.

We closed the case in October 2025 with a **suggestion** for the Bank to remind the company of the incident reporting obligation outlined in the finance contract and to agree on adding extra gender indicators to the company's annual reporting in line with EIB Environmental and Social Standard 8. These indicators should cover gender-related risks, grievances and incidents, if any.

At the end of 2025, this case was **under monitoring**.

Dispute resolution function

GREATER COLOMBO WASTEWATER PROJECT	
Region/country:	Asia/Sri Lanka
Type of complaint:	Environmental/social impact
Sector(s):	Water, sewerage
Case webpage:	SG/E/2024/27

In June 2024, we received a complaint from a community of affected households in Colombo about the potential environmental and social impacts of the [Greater Colombo Wastewater project](#). The project supports the improvement of wastewater collection and treatment facilities of Colombo's south catchment area.

The complaint focused on the construction of 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 participate in a collaborative dispute resolution process to find suitable solutions to the concerns raised. In addition to numerous individual meetings, our facilitation team conducted two rounds of joint dialogue sessions between the representatives of the complainants and the promoter in Colombo in October 2024 and April 2025.

The community and the promoter **reached an agreement** that includes the temporary relocation of 23 households located closest to the construction site. The agreed arrangement provides financial support for rent and transport and involves coordination with local authorities to facilitate permanent relocation for these households. The promoter also committed to keeping the community informed about construction activities, adhering to designated working hours and addressing any damage to nearby homes.

We closed the complaint in June 2025 with the issuance of the dispute resolution report. At the end of 2025, we were **monitoring** the agreed actions.



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

Monitoring function – Closed monitored cases (compliance)

DISCLOSURE OF A DATA LICENSE AGREEMENT	
Region/country:	N/A
Type of complaint:	Access to information
Sector(s):	N/A
Case webpage:	SG/A/2023/02

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 BV. The complainant considered that the exceptions to disclosure cited by the EIB concerning the protection of privacy and integrity of the individual and the protection of commercial interests were not justified.

As regards the exception related to the protection of privacy and integrity of the individual, the Data License Agreement contained personal data (names, initials, titles, email addresses and signatures). We verified whether the individuals consented to the disclosure of their personal data; none did. However, we found that 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.

As regards the exception related to 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 these findings, we closed the case in December 2024 and recommended that the EIB review its position with a view to granting the complainant the widest possible access to the requested document.

In February 2025, the relevant EIB services **addressed our recommendations and suggestions for improvement** via an email to the complainant. The correspondence indicates that the EIB reassessed its initial position, providing a revised copy of the Data License Agreement to the complainant, including licensor and licensee contact information as well as the single initial present on numerous pages of the document, all of which had previously been redacted. Nevertheless, the EIB services concluded that full disclosure was not possible, as financial and fees-related information, if disclosed, would undermine the commercial interests of the parties concerned, as well as information relating to identified or identifiable individuals, which, if disclosed, would undermine their privacy and integrity. The EIB did not consider that an overriding public interest exists that would prevail over the applicable disclosure exceptions. We therefore **closed the monitoring process** for this case.

OCEANLOOP SUSTAINABLE SHRIMP FARM	
Region/country:	European Union/Spain
Type of complaint:	Access to information
Sector(s):	Agriculture, forestry and fishing
Case webpage:	SG/A/2024/03

In December 2024, we received a complaint about the [Oceanloop Sustainable Shrimp Farm \(IEU GT2\) project](#) from a group of civil society organisations engaged in the protection of aquatic life. The project focuses on aquaculture, supporting a research, development and innovation farm in Germany and funding a large-scale, sustainable land-based shrimp production unit in Spain.

The complaint concerned the EIB's lack of transparency about the project information, specifically alleging: (i) a delay in the publication of the project summary on the EIB's website; (ii) failure to disclose the

environmental, climate and social risk categorisation of the project; and (iii) failure to disclose information on the management of the project’s impacts on animal welfare and biodiversity.

Our compliance review showed that: (i) the EIB’s decision to postpone the publication of the project summary had been taken beyond the deadlines prescribed in the EIB Group Transparency Policy; (ii) there is no obligation for the EIB to publish the environmental, climate and social risk categorisation assigned to the project; (iii) information on the management of the project’s impacts on animal welfare and biodiversity was not yet available and will be published in due time after the environmental impact assessment for the project is completed.

Notwithstanding the absence of an obligation for the EIB to publish the project’s environmental, climate and social risk categorisation, the Bank had committed to do so in the environmental and social data sheet, which we found positive in view of increasing the EIB’s transparency in environmental matters and aligning with the practice of other international financial institutions. We closed the case in October 2025 and suggested that the Bank not delay any further the announced publication of the project’s environmental, climate and social categorisation as part of the environmental and social data sheet, and develop as soon as possible the internal procedures necessary for that purpose. **The EIB has already implemented this suggestion**, and we therefore **closed the monitoring process** for this case in December 2025.

Beyond our compliance review, this case provided an opportunity for a constructive exchange between the civil society organisations and the EIB’s services in charge of assessing aquaculture projects. The complainants had concerns about the EIB’s decision to finance aquaculture projects in general. As this falls outside the scope of our mandate, we proposed that the complainants discuss their concerns directly with the EIB’s competent services. Our proposal led to a meeting and further exchanges, facilitated by the EIB’s Civil Society Unit, which proved to be satisfactory and fruitful for both parties.

G1 PÉNÉTRANTE SUD	
Region/country:	Southern Neighbourhood/Tunisia
Type of complaint:	Environmental/social impact
Sector(s):	Transport
Case webpage:	SG/E/2022/13

In August 2022, we received a complaint about the [G1 Pénétrante Sud project](#) from a Tunisian civil society organisation. The project concerns the widening of an 8.2 km section of the main southern road access to the city of Tunis in Tunisia.

The complainant alleged (i) insufficient civil society consultation; (ii) incomplete impact assessments, such as missing data on affected areas and tree removal; and (iii) potential environmental harm from deforestation, noise, and air pollution.

In cooperation with the EIB project team, we encouraged the complainant and the promoter to engage in a dialogue to address the issues raised. This led to an agreement in principle on: (i) the information the promoter had to share; and (ii) the regular involvement of civil society in all remaining stages of the project. We closed the case in June 2023.

Most of the agreed actions were implemented during the dialogue, while those related to the reforestation programme required more time. The promoter subsequently held meetings with civil society, including the complainant, which resulted in the development of a reforestation plan. Reforestation was carried out in February and March 2024, with the planting of 5 000 forest tree saplings in collaboration with and in the presence of civil society representatives. The EIB project team continues to monitor the management of noise emissions and air quality. **Based on these positive developments**, we **closed the monitoring process** in June 2025.

Monitoring function – Closed monitored cases (dispute resolution)

PUNE METRO RAIL	
Region/country:	Asia/India
Type of complaint:	Environmental/social impact
Sector(s):	Transport
Case webpage:	SG/E/2021/09

In February 2021, we received a complaint from a group of unlicensed fruit vendors about the [Pune Metro Rail project](#), which consists of the construction of two metro lines totalling 31.3 km and 30 stations, and the purchase of about 100 metro cars in Pune, India.

The complainants claimed that they had been forcefully removed from the Mandai market area without compensation. Our team, assisted by a local facilitator, organised 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 the skills and relevant information needed for the dispute resolution process, creating 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. In September 2024, we successfully closed the dispute resolution process.

We followed up with the fruit vendors and the promoter on the implementation of the agreed action points, holding separate meetings with each party. In May 2025, the parties' representatives confirmed that all four **agreed action points could be considered as completed**. In consultation with the parties, we have therefore **concluded our monitoring** for this case.



Mandai market in Pune (India)



Artisanal market set up along the highway to support people affected by the project

OPEN CASES

Complaints investigation and dispute resolution functions

GEORGIA TRANSPORT CONNECTIVITY I AND II	
Region/country:	Eastern Neighbourhood/Georgia
Type of complaint:	Environmental/social impact
Sector(s):	Transport
Case webpage:	SG/E/2025/02 , SG/E/2025/09 , SG/E/2025/10 , SG/E/2025/11

In 2025, we received four complaints about road projects in Georgia under the framework loans [Georgia Transport Connectivity I](#) and [II](#).⁴⁷ At the end of 2025, one complaint was undergoing a compliance review and three complaints were being dealt with through a dispute resolution process.

Compliance review

In January 2025, we received a complaint (SG/E/2025/02) from Green Alternative and CEE Bankwatch Network concerning two sub-projects: E-60 Chumateleti–Khevi Section F1 and E-60 Ubisa–Shorapani Section F3 (both are part of the framework loan Georgia Transport Connectivity I). The allegations relate to potential non-compliance with the EIB Environmental and Social Standards during construction, including issues of (i) slope instability; (ii) hydrological risks; (iii) waste management; (iv) health and safety; and (v) community impacts.

Following our initial assessment report, we determined that a compliance review would be the best way forward to deal with the complaint. Under Article 4.3.10 of the EIB Group Complaints Mechanism Policy,⁴⁸ we considered that some allegations were inadmissible as they concerned matters reasonably known to the complainants for over a year (for example, gaps in the environmental and social impact assessment from 2016-2018 and works completed in 2023). Allegations under investigation relate to slope instability, stockpiling of inert waste, hydrology risk, community impacts and the monitoring performed by the Bank.

In June 2025, we conducted a site visit to assess the local conditions and gather further information about the allegations under investigation. Our team met key stakeholders during the mission. At the end of 2025, the case was still under investigation.

⁴⁷ In September 2025, we closed another complaint ([SG/E/2024/28](#)) about the Algeti–Sadakhlo Road project that was received in 2024. We carried out a dispute resolution process, which addressed the complainant’s concerns about compensation for land and fruit trees and the negative impacts of the project’s construction works and subsequent operation.

⁴⁸ Complaints must be submitted within one year from the date on which the facts upon which the allegation is based could reasonably be known by the complainant ([EIB Group Complaints Mechanism Policy](#)).

Dispute resolution

In June and July 2025, we received three complaints from individuals about three road projects in Georgia under the framework loans Georgia Transport Connectivity I and II. The first complaint (SG/E/2025/09) about the Algeti–Sadakhlo Road project concerns the adequacy of compensation for land and perennials. The second complaint (SG/E/2025/10) alleges that the blasting from the E–60 Ubisa–Shorapani Section F3 sub-project triggered landslides and caused damage to the complainant’s house. The third complaint (SG/E/2025/11) about the E–60 Rustavi–Red Bridge Section relates to the adequacy of land compensation and livelihood impacts.

During the initial assessment, the complainants and the promoter agreed to engage in collaborative dispute resolution processes to find suitable solutions to the concerns raised. With the support of a local facilitator, we convened the first dialogue sessions (different sessions for each complaint) between the complainants and the promoter in November 2025.

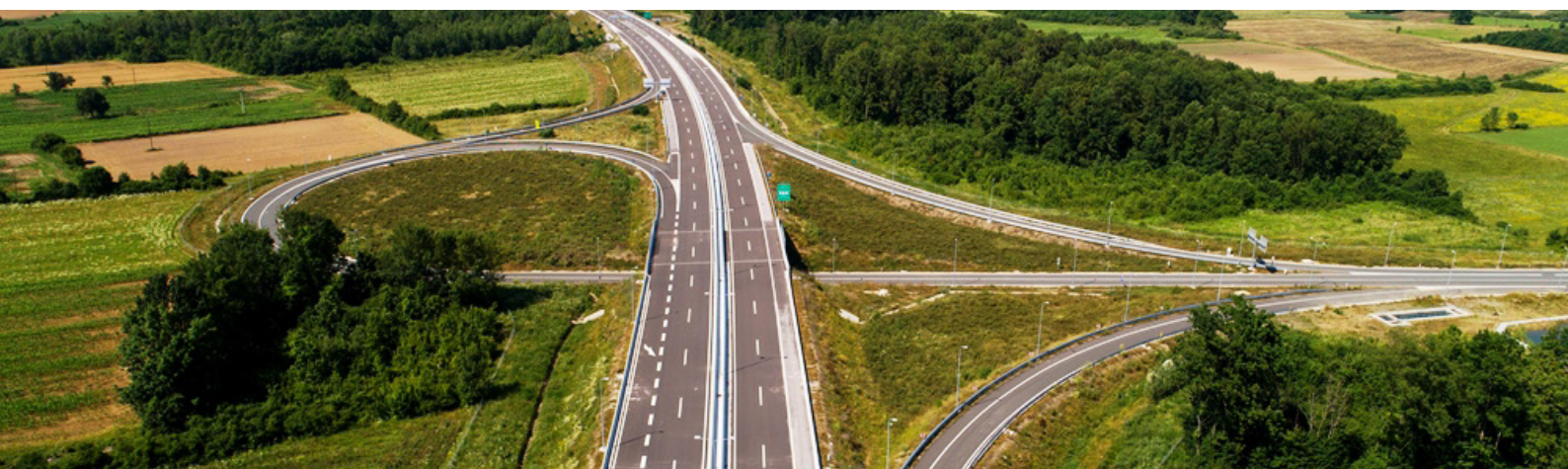
CORRIDOR VC MEDAKOVO–POPRIKUŠE

Region/country:	Western Balkans/Bosnia and Herzegovina
Type of complaint:	Environmental/social impact
Sector(s):	Transport
Case webpage:	SG/E/2024/11 , SG/E/2024/16 , SG/E/2025/05 , SG/E/2025/08 , SG/E/2025/12 and SG/E/2025/15

In 2024 and 2025, we received six complaints about the [Corridor Vc project](#) in Bosnia and Herzegovina. This project involves financing the construction of a new 35 km motorway section on Corridor Vc in the northern part of the country. Specifically, the complaints relate to the Medakovo–Poprikuše section, which remains under construction.

The issues raised primarily concern the environmental and social impacts of the project. The complainants, including local residents and one company located near the works, alleged: (i) structural damage to properties; (ii) insufficient compensation for land and crops; (iii) heightened flood risk; (iv) restricted access to homes; and (v) increased noise and air pollution.

Out of the six cases received, three are being handled through dispute resolution (SG/E/2024/16, SG/E/2025/05 and SG/E/2025/08), one is undergoing a compliance review (SG/E/2024/11), and as of the end of 2025, two were under initial assessment (SG/E/2025/12 and SG/E/2025/15).



Corridor Vc Medakovo–Poprikuše



Bogota Sustainable Transport

Complaints investigation function

BOGOTA SUSTAINABLE TRANSPORT	
Region/country:	Latin America/Colombia
Type of complaint:	Environmental/social impact
Sector(s):	Transport
Case webpage:	SG/E/2025/03

In February 2025, we received a complaint from a shop owner alleging that they were adversely affected by the construction of the [Bogota Sustainable Transport FL – Metro Line 1](#). The principal issues raised by the complainant concern two themes: (i) economic displacement; and (ii) stakeholder engagement.

With regard to economic displacement, the complainant alleges that project civil works have led to business disruptions, resulting in a significant loss of profit and a high risk of insolvency. According to the complainant, business owners affected by the project in a specified area of the construction works have been excluded from the project’s resettlement action plan. With regard to stakeholder engagement, the complainant considers that, as business owners affected by the project, they were inadequately informed and consulted about the risks and impacts of the project.

We issued our initial assessment report in December 2025. As of the end of 2025, the case was under investigation.

2026 OUTLOOK

We will continue to ensure our independence and contribute to the accountability of the EIB Group. Besides our core business of handling and monitoring complaints, our work in 2026 will focus on the following objectives:

FINALISE THE NEW POLICY

We will carry out an extensive public consultation with civil society organisations and other stakeholders before finalising the new policy and submitting it to the EIB Group's governing bodies for approval.

DEEPEN OUTREACH AND ENGAGEMENT

We will maintain active engagement with communities, civil society organisations and other stakeholders to increase awareness of the Complaints Mechanism's role and mandate. These efforts will be intensified in 2026 during the public consultation on the draft new policy and following its approval. Moreover, we will enhance the user experience on our website.

ENHANCE DISPUTE RESOLUTION

We will continue reinforcing our dispute resolution function, including building the capacity of local facilitators and mediators.

STRENGTHEN IN-REACH ACROSS THE EIB GROUP

We will continue engaging with EIB Group staff and governing bodies to raise awareness of the Complaints Mechanism's added value and enhance cooperation and institutional learning across operational teams.

ADVANCE OUR DIGITAL AMBITION

We will continue the digital transformation of our tools and workflows to improve efficiency and the user experience.

ANNEX I – CASE STATISTICS

GENERAL OVERVIEW

Caseload	2021	2022	2023	2024	2025
Open at the start of the year	43	43	44	44	33
Cases registered	64	54	60	69	61
Cases handled	107	97	104	113	94
Cases closed	64	53	60	80	62
Open at the end of the year	43	44	44	33	32

In 2025, the Complaints Mechanism handled 94 cases, closing 62 of them. The number of open cases at the end of the year remained more or less the same while we managed to reduce the backlog of long-overdue cases. Most of the open cases at year-end were cases that were registered in 2025.

The number of new complaints decreased compared to the previous year, with 61 new cases registered in 2025. Of the 49 complaints submitted directly to the Complaints Mechanism, we declared 21 admissible. There was a notable rise in complaints filed with the European Ombudsman, who received 12 complaints against the EIB Group and declared 11 of them admissible.

Incoming complaints	2021	2022	2023	2024	2025
Total complaints registered	64	54	60	69	61
Complaints submitted directly to the Complaints Mechanism	56	47	54	63	49
Inadmissible	17	13	10	24	28
Admissible	39	34	44	39	21
Complaints brought before other institutions ⁴⁹					
<i>European Ombudsman</i>	8	6	6	6	12
Inadmissible	2	1	1	0	1
Admissible	6	5	5	6	11
<i>Office of the United Nations High Commissioner for Human Rights</i>	-	1	-	-	-

We can see an increase in the proportion of complaints declared inadmissible by the mechanism, especially in the last two years (38% in 2024 and 57% in 2025). For most of the complaints that were declared inadmissible in 2025 (21 of the 28 inadmissible cases), the reason was that the complaint did not relate to EIB Group-financed operations or did not challenge EIB Group actions. The fact that many complaints received do not fall under the mandate of the Complaints Mechanism underlines the importance of continuing our outreach efforts to provide targeted information about our mandate. This will become even more important once the new policy is adopted.

⁴⁹ Complaints concerning EIB Group activities can also be submitted to the European Data Protection Supervisor and the Aarhus Convention Compliance Committee. Over the last five years, no such complaints have been recorded in the Complaints Mechanism's registry.

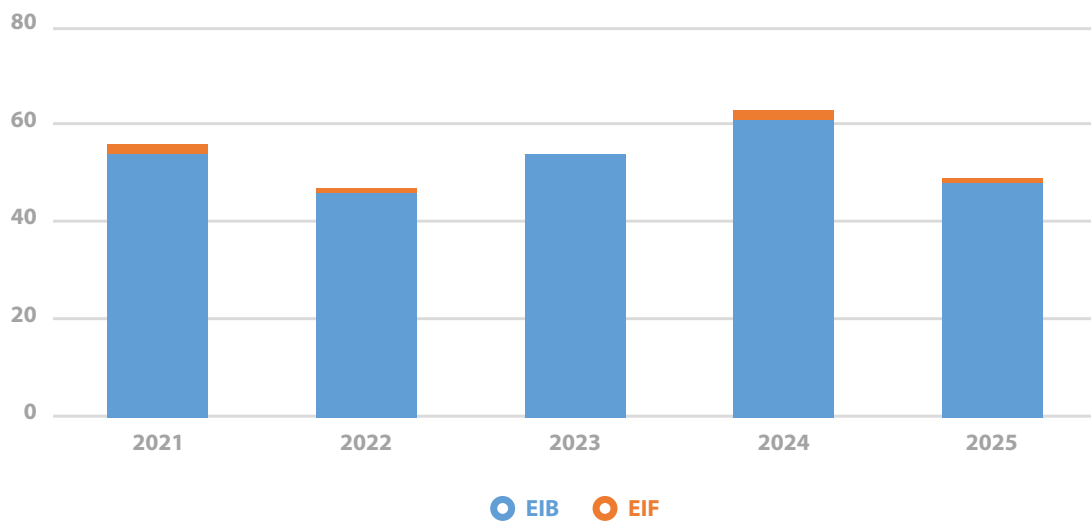
Admissible complaints are those concerning a decision, action and/or alleged omission by the EIB Group – even at early stages when the EIB Group is only considering providing support.

Inadmissible complaints include those:

- concerning fraud or corruption (which are handled by the Inspectorate General's Investigations 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 2025, we received one complaint related to EIF activities.



NEW COMPLAINTS DECLARED ADMISSIBLE BY THE COMPLAINTS MECHANISM IN 2025

Complaints by type

Project-related environmental and social impact cases remained at the core of the mechanism's work. They accounted for 81% of the new admissible complaints in 2025. The Complaints Mechanism did not register any new admissible human resources cases in 2025.

New admissible complaints	2021		2022		2023		2024		2025	
	n*	%	n	%	n	%	n	%	n	%
Access to information (A)	1	2	2	6	2	5	3	8	1	5
Customer relations (C)	0	0	1	3	0	0	0	0	0	0
Environmental/social impact (E)	27	69	23	68	27	61	30	77	17	81
Governance of financed projects (F)	3	8	0	0	1	2	0	0	0	0
Own governance and administration (G)	3	8	7	20	7	16	2	5	3	14
Human resources (H)	5	13	1	3	7	16	4	10	0	0
Total	39	100	34	100	44	100	39	100	21	100

*n stands for number

Project-related complaints by region

Of the complaints declared admissible by the Complaints Mechanism in 2025, 81% relate to EIB-financed projects (17 out of 21 new admissible cases), with all of these containing allegations about their environmental and social impacts.

As in previous years, most complaints concerned projects beyond the European Union (88%). The number of complaints received concerning different projects in the Eastern Neighbourhood increased in 2025.

New admissible project-related complaints	2021	2022	2023	2024	2025	2025
	%	%	%	%	n	%
Asia	10	4	0	9	1 ⁵⁰	6
Eastern Neighbourhood	3	0	0	3	5 ⁵¹	29
European Union	45	16	7	41	2 ⁵²	12
Southern Neighbourhood	10	4	7	0	1 ⁵³	6
Latin America	0	4	7	0	0	0
Other	12	44	69	16	2 ⁵⁴	12
Sub-Saharan Africa	10	12	10	9	1 ⁵⁵	6
Western Balkans	10	16	0	22	5 ⁵⁶	29
Total	100	100	100	100	17	100

50 Tajikistan.

51 Georgia and Ukraine.

52 Austria and Slovenia.

53 Colombia.

54 Morocco and Tunisia.

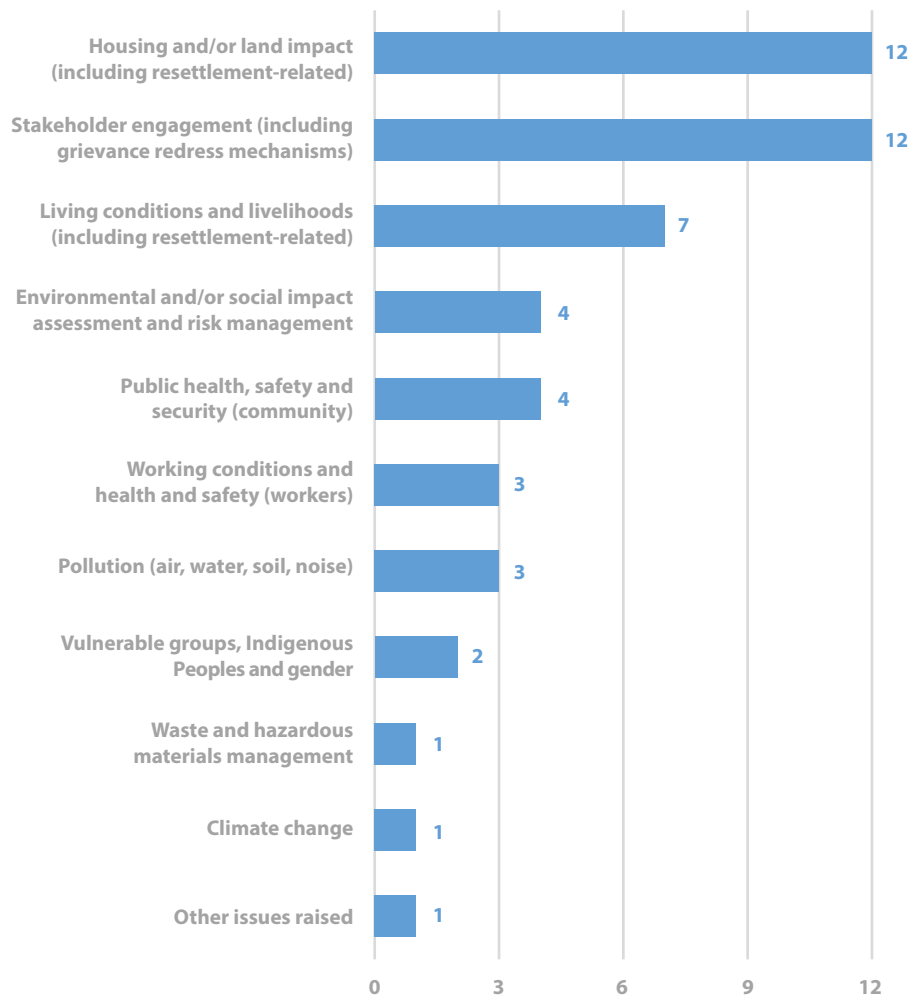
55 Kenya.

56 Bosnia and Herzegovina, and Serbia.

The new admissible project-related complaints (17) relate to 14 different projects globally (two projects in the European Union and 12 projects beyond the European Union), as highlighted in the table below.

Number of projects with new admissible cases by region	2025
Asia	1
Eastern Neighbourhood	5
European Union	2
Latin America	1
Southern Neighbourhood	2
Sub-Saharan Africa	1
Western Balkans	2
Total	14

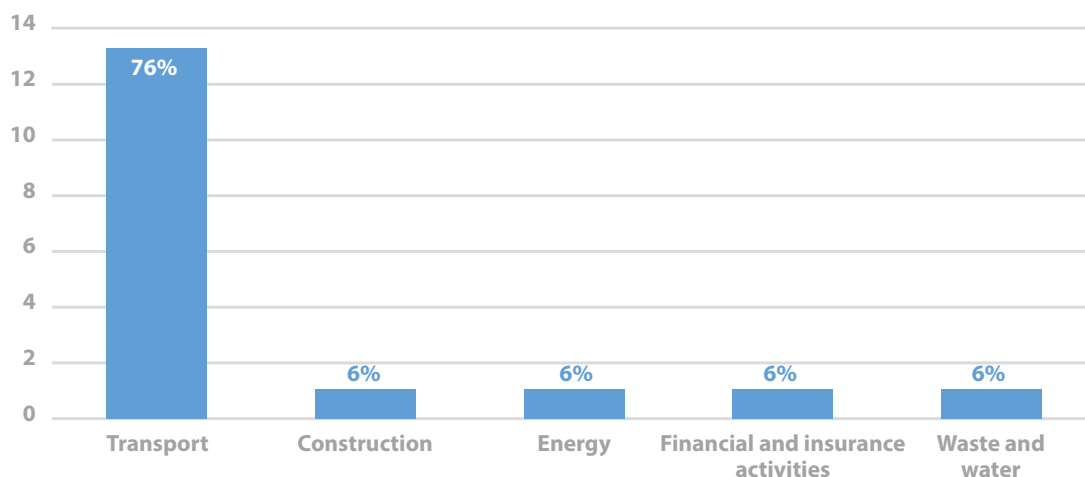
The most common concerns raised were the negative impacts of projects on housing and land, living conditions and livelihoods (mostly related to resettlement) as well as inadequate stakeholder engagement.



* One complaint can contain several concerns raised by the complainant.

Project-related complaints by sector

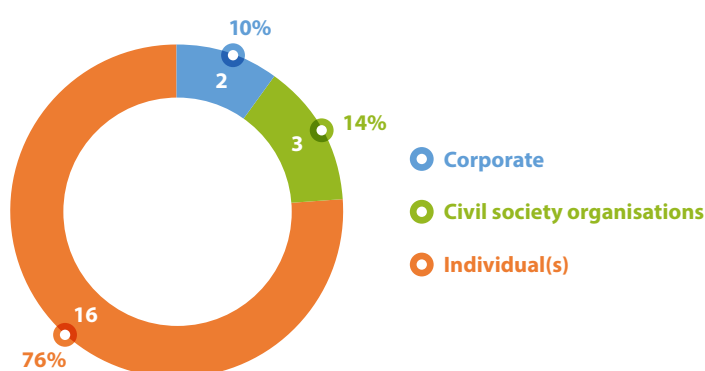
In 2025, transport continued to be the sector with by far the highest number of project-related complaints (76%).



Complaints by origin

Most of the new admissible complaints in 2025 were lodged by individuals (76%); 94% of their allegations concerned environmental and social impact cases, and the remaining 6% were governance and administration cases.

The proportion of complaints submitted by civil society organisations decreased to 14% of the total (three complaints compared to ten in 2024). Their allegations primarily concerned environmental and social impact cases as well (67%), followed by governance and administration cases (33%). The number of complaints submitted by corporates was the same in 2025 (two complaints), with their allegations evenly split between governance and administration cases (50%) and access to information cases (50%).



COMPLAINTS HANDLED⁵⁷

After handling 94 cases in 2025 (compared with 113 in 2024⁵⁸), the number of open cases remained more or less the same compared to the previous year, reaching 32 at year-end. However, we managed to reduce the backlog of long-overdue cases to its lowest level since 2018.

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

⁵⁷ This includes cases still open at the end of 2024 and the new registered cases in 2025 (including the complaints lodged with the European Ombudsman).

⁵⁸ This included 28 cases related to the Zenata Urban Development project.

Handled complaints by type

Type of complaint	Complaints handled in 2024		Complaints handled in 2025	
	n	%	n	%
European Ombudsman (EO)	7	6	13	14
Access to information (A)	5	5	5	5
Environmental/social impact (E)	67	59	44	47
Governance of financed projects (F)	0	0	0	0
Own governance and administration (G)	4	4	3	3
Human resources (H)	6	5	1	1
Inadmissible (INA)	24	21	28	30
Total	113	100	94	100

Environmental and social impact cases remained the largest handled category of cases, though their share decreased slightly as the share of inadmissible cases rose. We also handled nearly twice the number of European Ombudsman cases in 2025.

CLOSURE OF REGISTERED CASES LODGED WITH THE COMPLAINTS MECHANISM

In 2025, the Complaints Mechanism closed 62 cases: 55 had been submitted directly to us, and seven had been lodged with the European Ombudsman. In 2025, we closed 11 cases following compliance reviews that identified maladministration, and eight cases where the allegations were found to be unsubstantiated.

Conclusion of registered complaints	2025	%
<i>Admissible cases</i>		
Recommendation	11	20
No grounds	8	14
Friendly solution	6	11
No further inquiry needed	2	4
Subtotal of admissible complaints	27	49
<i>Inadmissible cases</i>	28	51
Total	55	100

In 11 of the closed cases, the Complaints Mechanism made suggestions for improvement.⁵⁹

⁵⁹ 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.

OPEN CASES LODGED WITH THE COMPLAINTS MECHANISM

Most of the cases open at the end of 2025 that were submitted directly to us were environmental and social impact cases (88%). These cases are typically the most complex, often involving numerous complaints and/or multiple allegations.

Open at the end of the year by type of complaint	2025	%
Environmental/social impact (E)	23	88
Own governance and administration (G)	3	12
Total	26	100

Status at year-end of open cases lodged with the Complaints Mechanism	2025
Registered	1
Under prevention procedure ⁶⁰	1
Initial assessment	5
Investigation	10 (of which 5 with draft report under consultation)
Dispute resolution	9
Total	26

OVERVIEW OF CASES LODGED WITH THE EUROPEAN OMBUDSMAN

Caseload	2021	2022	2023	2024	2025
Open at the start of the year	4	5	1	1	1
Received	8	6	6	6	12
Closed	7	10	6	6	7
Open at the end of the year	5	1	1	1	6

Outcome of European Ombudsman cases⁶¹

Outcome of closed cases	2024	2025
Settled	5	4
Closed without further action	1	2
Inadmissible ⁶²	0	1

For all the closed cases, the European Ombudsman did not find maladministration by the EIB Group.

⁶⁰ In specific and well-defined cases (before a decision to finance an operation is made by the EIB Group governing bodies), the Complaints Mechanism transfers the complaint to the EIB Group services. More information about the prevention procedure can be found in the [EIB Group Complaints Mechanism Policy](#) (Article 4.2.2) and the [EIB Group Complaints Mechanism Procedures](#) (Article 3).

⁶¹ Some complaints contain multiple allegations, so they can have several outcomes. Moreover, the European Ombudsman can make suggestions for improvement irrespective of the overall outcome. [Annex IV](#) defines the outcomes for European Ombudsman cases.

⁶² 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 2025	Monitoring
Access to information												
SG/A/2023/01	Publication of project summaries and associated environmental information	Poland Italy Chile Spain Germany Ireland	12/01/23	•	•			•	Recommendation		•	•
SG/A/2024/01	Global Emerging Markets Consortium: Disclosure of the General Assembly Annual Meeting Minutes	N/A	30/04/24	•	•			•	Recommendation		•	•
SG/A/2024/02	Zero Carbon Lithium	Germany	20/11/24	•	•			•	Friendly solution		•	
SG/A/2024/03	Oceanloop Sustainable Shrimp Farm (IEU GT2)	Spain	18/12/24	•	•			•	Recommendation	•	•	•
SG/A/2025/01	Disclosure of the EIB Review and Evaluation Process reports	N/A	13/03/25	•	•			•	Recommendation		•	•

Environmental, social and development impacts of financed projects/operations												
SG/E/2020/02	Nepal Tanahu Hydropower Project	Nepal	20/02/20	•	•	•	•					
SG/E/2021/10	Nepal Tanahu Hydropower Project	Nepal	08/06/21	•	•	•	•	•				
SG/E/2021/11	Nepal Tanahu Hydropower Project	Nepal	08/06/21	•	•	•	•	•				
SG/E/2021/21	Bogotá Sustainable Transport FL	Colombia	28/10/21	•	•			•				
SG/E/2022/07	Zenata Urban Development	Morocco	31/03/22	•		•	•	•	Recommendation		•	•
SG/E/2022/09	Bogotá Sustainable Transport FL	Colombia	19/05/22	•	•			•	No grounds		•	
SG/E/2022/14	Railway Nis-Dimitrovgrad	Serbia	29/09/22	•		•	•	•	Friendly solution		•	•
SG/E/2023/04	Zenata Urban Development	Morocco	08/03/23	•	•		•	•	Recommendation	•	•	•
SG/E/2023/21	Metro de Madrid Line 11 Extension	Spain	19/09/23	•	•			•	Recommendation	•	•	•
SG/E/2023/26	Flood Protection Measures	Greece	30/11/23	•	•		•	•				
SG/E/2023/28	Bolivia Mi Agua Water and Sanitation	Bolivia	07/12/23	•	•			•	No grounds	•	•	•
SG/E/2024/03	Poklečani Wind Farm	Bosnia and Herzegovina	08/02/24	•	•			•	No grounds	•	•	•
SG/E/2024/09	Zenata Urban Development	Morocco	25/03/24	•	•		•	•	No grounds	•	•	•
SG/E/2024/11	Corridor Vc Medakovo - Poprikuše	Bosnia and Herzegovina	17/04/24	•	•							
SG/E/2024/16	Corridor Vc Medakovo - Poprikuše	Bosnia and Herzegovina	30/04/24	•		•	•					
SG/E/2024/17	Zenata Urban Development	Morocco	30/05/24	•	•		•	•	Recommendation	•	•	•
SG/E/2024/18	Zenata Urban Development	Morocco	30/05/24	•	•		•	•	Recommendation	•	•	•
SG/E/2024/21	Kanpur Metro Project and Agra Metro Rail Project	India	04/07/24	•	•			•	No grounds	•	•	•
SG/E/2024/22	X4 (part of the Modernisation Routière II)	Tunisia	04/07/24	•		•	•	•	Friendly solution		•	•
SG/E/2024/24	Flood Protection Measures	Greece	17/07/24	•	•			•				
SG/E/2024/25	Poklečani Wind Farm	Bosnia and Herzegovina	17/07/24	•	•			•	No grounds	•	•	•
SG/E/2024/27	Greater Colombo Wastewater	Sri Lanka	06/08/24	•		•	•	•	Friendly solution		•	•
SG/E/2024/28	Algeti - Sadakhlo Road (FL 20170159)	Georgia	06/08/24	•		•	•	•	Friendly solution		•	
SG/E/2024/29	Lana River Front - Urban Redevelopment	Albania	27/08/24	•	•				No grounds		•	
SG/E/2024/30	E-80 Highway Nis - Merdare Phase 1	Serbia	26/09/24	•	•			•	No further inquiry needed		•	
SG/E/2024/31	Brownfields 3	France	12/12/24	•	•			•	No further inquiry needed		•	
SG/E/2024/32	East Africa Clean Cooking Expansion	Kenya	18/12/24	•	•			•	No grounds	•	•	•
SG/E/2025/01	Autoroute Du Centre	Tunisia	20/01/25	•		•	•					
SG/E/2025/02	Georgia Transport Connectivity	Georgia	27/01/25	•	•		•					
SG/E/2025/03	Bogota Sustainable Transport	Colombia	14/02/25	•	•			•				
SG/E/2025/04	Zenata Urban Development	Morocco	14/02/25	•	•				Recommendation		•	•
SG/E/2025/05	Corridor Vc Medakovo - Poprikuše	Bosnia and Herzegovina	12/05/25	•		•	•					

Reference number	Subject/project	Project country	Registry date	Assessment	Investigation	Dispute resolution	Site visit(s)	Consultation	Outcome	Suggestions for improvement	Closed during 2025	Monitoring
SG/E/2025/06	Divaca-Koper Second Rail Track	Slovenia	12/05/25	•		•	•					
SG/E/2025/07	Regional Mombasa Port Access Road	Kenya	23/05/25	•				•	Friendly solution		•	
SG/E/2025/08	Corridor Vc Medakovo - Poprikuše	Bosnia and Herzegovina	12/05/25	•		•	•					
SG/E/2025/09	Algeti - Sadakhlo Road (FL 20170159)	Georgia	16/07/25	•		•	•					
SG/E/2025/10	E-60 Ubisa - Shorapani Section F3 (FL 20160404)	Georgia	16/07/25	•		•	•					
SG/E/2025/11	E-60 Rustavi - Red Bridge section	Georgia	16/07/25	•		•	•					
SG/E/2025/12	Corridor Vc Medakovo - Poprikuše	Bosnia and Herzegovina	13/10/25	•								
SG/E/2025/13	Railway Nis-Dimitrovgrad	Serbia	24/10/25	•								
SG/E/2025/14	Ukraine Recovery Programme	Ukraine	12/11/25	•								
SG/E/2025/15	Corridor Vc Medakovo - Poprikuše	Bosnia and Herzegovina	12/11/25	•								
SG/E/2025/16/PR	Tajikistan Completion of Rogun Hydro Power Plant	Tajikistan	01/12/25	•								

Own governance/administration, including own procurement

SG/G/2025/01	EIB financing to Israeli companies	N/A	26/08/25	•	•							
SG/G/2025/02	EIB tender procedure MAA 000064	N/A	12/11/25	•	•							
SG/G/2025/03	Alleged procurement irregularities	N/A	15/12/25	•								

Human resources

SG/H/2024/04	Alleged unfair selection process	N/A	20/06/24	•	•			•	No grounds		•	
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Inadmissible complaints

SG/INA/2025/01	Zenata Urban Development	Morocco	09/01/25	•					Inadmissible		•	
SG/INA/2025/02	Kanpur Metro Project	India	09/01/25	•					Inadmissible		•	
SG/INA/2025/03	Motorway project in Bosnia and Herzegovina	Bosnia and Herzegovina	14/02/25	•					Inadmissible		•	
SG/INA/2025/04	Intermediary bank in Tunisia	Tunisia	28/02/25	•					Inadmissible		•	
SG/INA/2025/05	Barrage Reservoir de Lom Pangar	Cameroon	09/04/25	•					Inadmissible		•	
SG/INA/2025/06	Job market discrimination	Italy	23/05/25	•					Inadmissible		•	
SG/INA/2025/07	EIB operations with Israeli counterparts	Israel	23/05/25	•					Inadmissible		•	
SG/INA/2025/08	Autoroute Du Centre	Tunisia	19/06/25	•					Inadmissible		•	
SG/INA/2025/09	Zenata Urban Development	Morocco	19/06/25	•					Inadmissible		•	
SG/INA/2025/10	Housing issues in France	France	01/07/25	•					Inadmissible		•	
SG/INA/2025/11	Rural network project	Slovenia	01/07/25	•					Inadmissible		•	
SG/INA/2025/12	Employment agreement	Pakistan	01/07/25	•					Inadmissible		•	
SG/INA/2025/13	Property rights and legal security in Croatia	Croatia	16/07/25	•					Inadmissible		•	
SG/INA/2025/14	ONEE - Projet Eolien	Morocco	16/07/25	•					Inadmissible		•	
SG/INA/2025/15	Akaki-Peristerona Road Upgrade (Phase C1)	Cyprus	20/08/25	•					Inadmissible		•	
SG/INA/2025/16	Housing issues in France	France	11/09/25	•					Inadmissible		•	
SG/INA/2025/17	Regional and City-Level Cycling Infrastructure Development	Latvia	11/09/25	•					Inadmissible		•	
SG/INA/2025/18	Misconduct by an InvestEU financial intermediary	Portugal	30/09/25	•					Inadmissible		•	
SG/INA/2025/19	FGV Sustainable Rail Infra and Rolling Stock FL	Spain	13/10/25	•					Inadmissible		•	
SG/INA/2025/20	Arbitrary refusal of re-entry into Georgia	Georgia	24/10/25	•					Inadmissible		•	
SG/INA/2025/21	Housing issues in France	France	12/11/25	•					Inadmissible		•	
SG/INA/2025/22	EIB failure to execute its security and defence mandate	South Africa	12/11/25	•					Inadmissible		•	
SG/INA/2025/23	Failure to annotate disputed credit record	Paraguay	01/12/25	•					Inadmissible		•	
SG/INA/2025/24	Systemic governance failures in Armenia	Armenia	01/12/25	•					Inadmissible		•	
SG/INA/2025/25	E-80 Highway Nis-Merdare Phase I	Serbia	15/12/25	•					Inadmissible		•	
SG/INA/2025/26	Olkaria VII 80 3MW Geothermal Power Project	Kenya	15/12/25	•					Inadmissible		•	
SG/INA/2025/27	El Escudo Wind Farm	Spain	15/12/25	•					Inadmissible		•	
SG/INA/2025/28	Alleged non-payment of invoices by a third party	Côte d'Ivoire	15/12/25	•					Inadmissible		•	

European Investment Fund (EIF)

EIF/E/2025/01	Fund F	Austria	20/08/25	•								
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Reference number	Subject/project	Project country	Registry date	Decision date	Outcome	Suggestions for improvement	Closed during 2025	Monitoring
European Ombudsman								
EO/2036/2024/ACB	The EIB's failure to reply to confirmatory request for access to documents	N/A	18/11/24	11/03/25	Settled		•	
EO/2346/2024/VB	The EIB's failure to apply the reasoning of the European Court of Justice	N/A	15/01/25	14/05/25	Closed without further action		•	
EO/679/2025/KW	How the EIB Complaints Mechanism handles complaints about the financing of a windmill project in Bosnia and Herzegovina	Bosnia and Herzegovina	04/04/25	05/05/25	Settled		•	
EO/249/2025/SF	EIB's reply to a request for internal review of the EIB Board of Directors' decision approving the financing proposal for the Poklečani Windfarm in Bosnia and Herzegovina	Bosnia and Herzegovina	02/05/25	08/07/25	Closed without further action		•	
EO/1875/2024/SF	Budapest Airport Concession	Hungary	20/05/25					
EO/627/2025/SF	The EIB's refusal to grant public access to documents related to the European Anti-Fraud Office follow-up investigations	N/A	22/05/25					
EO/1897/2025/SF	Confirmatory application on access to documents request on Poklečani Windfarm in Bosnia and Herzegovina	Bosnia and Herzegovina	15/07/25	02/12/25	Inadmissible		•	
EO/1462/2025/VB	EIB operations involving Israeli entities	Luxembourg	02/10/25					
EO/2869/2025/IJ/FTR	Failure to reply to a request for initiation of the invalidity procedure	Luxembourg	10/10/25	21/11/25	Settled		•	
EO/QI/7/2025/NH	Request for public access to minutes of a meeting	Luxembourg	23/10/25					
EO/3048/2025/RVK	Failure to reply to a complaint regarding a personal data breach	Luxembourg	10/11/25	03/12/25	Settled		•	
EO/3293/2025/KR	Failure to reply to a complaint addressed to the EIB Complaints Mechanism	Luxembourg	17/12/25					
EO/2777/2025/FA	EIF Invitation to tender ITT75, ref. 2019-HRS-DPS	Luxembourg	18/12/25					

ANNEX III – CASES UNDER MONITORING

Reference number	Subject/project	Starting date for implementation	Total number of action points issued	Number of action points open at end of 2025	Share of action points fully implemented at end of 2025
Compliance cases					
SG/E/2013/01	Marišćina County Waste Management Centre	30/01/2019	5	2	60%
SG/G/2019/01	EIB intermediated lending to HPPs in the Balkans	30/09/2019	4	1	75%
SG/E/2017/27	Regional Mombasa Port Access Road RAP	25/11/2019	1	1	0%
SG/E/2017/41	Regional Mombasa Port Access Road RAP	25/11/2019			
SG/E/2018/44	Regional Mombasa Port Access Road RAP	25/11/2019	2	1	50%
SG/E/2016/10	Grand Contournement Ouest de Strasbourg	20/03/2020			
SG/E/2018/26	Grand Contournement Ouest de Strasbourg	20/03/2020	9	3	67%
SG/E/2019/01	Kharkiv Metro Extension	27/04/2020			
SG/E/2018/43	S2 Dénivellation de huit carrefours à Sfax	16/11/2020	1	1	0%
SG/E/2018/35	D4R7 Slovakia PPP	26/01/2021	7	7	0%
SG/E/2019/16	Piraeus Port Expansion	10/03/2021	1	1	0%
SG/E/2018/39	Nepal Power System Expansion	16/03/2021	8	1	88%
SG/E/2020/07	Marišćina County Waste Management Centre	01/06/2021	2	2	0%
SG/E/2020/03	Budapest Airport Concession	21/10/2021	4	1	75%
SG/E/2019/03	Banja Luka-Doboj Motorway	28/10/2021	2	1	50%
SG/E/2019/06	Banja Luka-Doboj Motorway	27/10/2023			
SG/E/2021/05	Banja Luka-Doboj Motorway	27/10/2023			
SG/E/2021/06	Banja Luka-Doboj Motorway	27/10/2023			
SG/E/2021/07	Banja Luka-Doboj Motorway	27/10/2023			
SG/E/2020/11	Oosterweel Connection	18/11/2021	3	1	67%
SG/E/2020/06	SE Safety Improvement	18/05/2022	4	1	75%
SG/E/2020/21	Autobahn A49 Fritzlar-Ohmtal Dreieck (PPP)	27/09/2022	1	1	0%
SG/E/2021/02	Autobahn A49 Fritzlar-Ohmtal Dreieck (PPP)	27/09/2022			
SG/E/2021/18	AQP-Water Sector Upgrade Southern Italy	03/10/2022	3	1	67%
SG/E/2021/03	S2 Dénivellation de huit carrefours à Sfax	28/02/2023	4	1	75%
SG/E/2022/03	Small Hydropower projects - Loan for SMEs & Priority Projects II	21/03/2023	4	3	25%
SG/A/2022/02	Akiira I Geothermal Power Plant	18/04/2023	1	1	0%
SG/E/2021/12	Flood Protection Measures	08/05/2023	5	3	40%
SG/E/2021/15	Flood Protection Measures	08/05/2023			
SG/E/2021/17	Flood Protection Measures	08/05/2023			
SG/E/2021/23	S4 Déviation Zarzis	19/10/2023	4	2	50%
SG/E/2021/09	Pune Metro Rail Project - India	02/04/2024	8	1	88%
SG/E/2022/05	SRWB Water Supply and Sanitation Programme - Malawi	28/03/2024	4	3	25%
SG/E/2021/08	Zenata Urban Development	06/02/2024	9	8	11%
SG/E/2022/11A	Zenata Urban Development	06/02/2024			
SG/E/2022/11C	Zenata Urban Development	06/02/2024			
SG/E/2022/18	Zenata Urban Development	06/02/2024			
SG/E/2023/10	Zenata Urban Development	06/02/2024			
SG/E/2023/11	Zenata Urban Development	06/02/2024			
SG/E/2023/13	Zenata Urban Development	06/02/2024			
SG/E/2023/14	Zenata Urban Development	06/02/2024			
SG/E/2023/15	Zenata Urban Development	06/02/2024			
SG/E/2023/16	Zenata Urban Development	06/02/2024			
SG/E/2023/19	Zenata Urban Development	06/02/2024			

Reference number	Subject/project	Starting date for implementation	Total number of action points issued	Number of action points open at end of 2025	Share of action points fully implemented at end of 2025
SG/E/2023/22	Zenata Urban Development	06/02/2024	9	8	11%
SG/E/2023/23	Zenata Urban Development	14/11/2024			
SG/E/2022/07	Zenata Urban Development	25/02/2025			
SG/E/2025/04	Zenata Urban Development	06/02/2024			
SG/E/2023/04	Zenata Urban Development	16/07/2025			
SG/E/2024/17	Zenata Urban Development	16/07/2025			
SG/E/2024/18	Zenata Urban Development	16/07/2025			
SG/E/2024/09	Zenata Urban Development	28/07/2025			
SG/A/2023/01	Publication of project summaries and associated environmental information	13/01/2025	4	3	25%
SG/A/2024/01	Global Emerging Markets Consortium: Disclosure of the General Assembly Annual Meeting Minutes	08/05/2025	1	1	0%
SG/E/2024/32	East Africa Clean Cooking Expansion	10/10/2025	1	1	0%
SG/E/2024/21	Kanpur Metro Project and Agra Metro Rail Project	11/11/2025	1	1	0%
SG/E/2023/28	Bolivia Mi Agua Water and Sanitation	19/11/2025	2	2	0%
SG/E/2023/21	Metro de Madrid Line 11 Extension	03/12/2025	2	2	0%
SG/A/2025/01	Disclosure of the EIB Review and Evaluation Process reports	19/12/2025	1	1	0%

Reference number	Subject/project	Starting date for monitoring of agreement	Total number of action points agreed	Number of action points open at end of 2025	Share of action points fully implemented at end of 2025
Dispute resolution cases					
SG/E/2021/16A	Malawi NRW Water Efficiency	26/07/2022	17	3	82%
SG/E/2021/09B1	Pune Metro Rail Project	09/09/2022	5	3	40%
SG/E/2022/06	Bangalore Metro Rail Project - Line 6	29/06/2023	12	3	75%
SG/E/2024/22	X4 (part of the Modernisation Routière II)	09/04/2025	3	2	33%
SG/E/2024/27	Greater Colombo Wastewater Project	30/06/2025	6	5	17%
SG/E/2022/14	Railway Nis-Dimitrovgrad	06/11/2025	3	0	100%

ANNEX IV – 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 ⁶³	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: <ul style="list-style-type: none"> the complaint points to a failure to comply with relevant EIB provisions; outcomes are consistent with the desired effects of the EIB provisions; EIB provisions are adequate to handle the issues raised by the complaint.
Collaborative resolution process ⁶⁴	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.
Monitoring	Monitoring by the EIB Complaints Mechanism of further developments and the implementation of recommendations and/or suggestions for improvement accepted by the EIB in relation to the 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 take one or more specific actions to foster good administration.

63 www.eib.org/en/about/accountability/complaints/investigation/index.htm.

64 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.
Prevention⁶⁵	In specific and well-defined cases, EIB Group services are given the opportunity to address the complainants' 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 financing 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 take one or more specific actions to foster good administration.

⁶⁵ The prevention process applies before a decision to finance an operation is made by the EIB Group governing bodies; that is, when maladministration about 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

REPORT 2025



European
Investment Bank | Group