Dear Miss Radonjic Ker-Lindsay,

Firstly, Western Sahara Campaign UK would like to take this opportunity to thank EBRD for its letter dated 4 February 2019, in repose to a letter that we sent to the EBRD on 22 January 2019. That letter was signed by the Civil Society Engagement Unit.

Secondly, thank you for letting us know that the EBRD is working on the next country strategy for Morocco, and that you hope for it to be put up for public comment next year. It is also good to hear that the EBRD closely monitors political developments in the countries where it operates and provides advice to the board when relevant.

However, in your letter you also mention that “Under project […] (GCF GEFF Regional FW – BMCE Bank - Op ID 50620), each individual sub-project is due to be reviewed by the EBRD in order to ensure their acceptability”. In relation to that, we have two further questions:

1. Has the EBRD reviewed any projects that are or were partially or fully implemented and/or applicable to the territory of Western Sahara since project GCF GEFF Regional FW – BMCE Bank - Op ID 50620 came into force?

2. If so, what was/were the outcome/s of such review/s?

Furthermore, we hope that given the fact that the EBRD has a specific Civil Society Engagement Unit, of which the main purpose is to engage with the wider civil society on matters and projects that the Bank is working on, that you will respond to both of our questions above and answer the two questions that remain unanswered from our previous letter, listed here:

a) Taking into account the decisions of the ECJ in 2016 and 2018, ruling that EU-Morocco agreements cannot be applied to Western Sahara as the territory is ‘separate and distinct’ from Morocco, does the EBRD consider its strategy applicable to the territory of ‘Morocco’ as defined by the ECJ, or does the strategy also apply to areas outside of the internationally recognised borders of Morocco?

The WSC works in solidarity with the Saharawi people to generate political support in order to advance their right to self-determination and promote their human rights.
b) In line with the current country strategy, what are the mechanisms that the EBRD has put in place to ensure that the funds loaned to BMCE will not end up funding projects in the territory that Morocco holds under military occupation?

We look forward to your reply to our four questions,

Yours sincerely,

Beccy Allen  
Committee Member  
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