

Steve Head
Information Officer



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By email

30 January 2009

Dear Mr Hildyard

**REQUEST FOR INFORMATION UNDER THE FREEDOM OF INFORMATION ACT
2000: FOI(09)02**

I refer to your request for information dated 3 January 2009, which we have considered under the Freedom of Information Act 2000. In that request you asked a number of questions, to which we respond below.

(a) Please confirm that ECGD was aware prior to its decision to support the BTC project of the risk raised by NGOs that the BTC project would inflame conflict in the region?

Yes, ECGD was so aware.

(b) Please confirm that ECGD was aware prior to its decision to support the BTC project of the risk raised by NGOs that the pipeline was at risk from attack by the PKK in Turkey?

Yes, ECGD was so aware.

(c) Please confirm that ECGD was aware prior to its decision to support the BTC project of fears expressed by Georgians that Russia would seek to impose control on Georgia by force and of reports that Russia was displeased by the project?

Yes, ECGD was so aware.

(d) Did the ECGD undertake an assessment of the conflict-related risks raised by NGOs prior to the decision to support the BTC project? If so, please supply the title and date of the assessment and the identity of the department or institution that undertook it.

Points (a) and (b) above were included in a paper submitted to ECGD's Underwriting Committee entitled 'Baku-Tbilisi-Ceyhan Pipeline Project' and dated December 2003.



(e) Did the ECGD undertake an assessment of the risk that the BTC project might incite Russia to act to reassert its control over oil and gas exports from the Caspian? If so, please supply the title and date of the assessment and the identity of the department or institution that undertook it.

ECGD holds no information relating to this specific request, but was a recipient of the 'Strategic Conflict Assessment – Georgia', written by Tony Vaux and dated July 2003.

(f) Did the ECGD consider any of the above conflict-related risks to be material?

These were considered to be material insofar as they were considered by ECGD's Underwriting Committee.

(g) Was the Underwriting Committee informed of the above conflict-related risks prior to a decision being made to support the BTC project?

Yes – see d) above.

(h) Is the ECGD considering any assessment of its due diligence procedures in relation to conflict risks in the light of recent events in the South Caucasus?

No.

If you have any queries about this letter, please contact me. You should quote the reference number above in any future communications.

If you are unhappy with the service you have received in relation to your request and wish to make a complaint or request an internal review of this decision, you should write to Steve Roberts-Mee, Senior Information Officer, ECGD, 2 Exchange Tower, Harbour Exchange Square, London E14 9GS, or email: information.access@ecgd.gsi.gov.uk.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Yours sincerely



**Steve Head
Information Officer**