



Julita WILCZEK

Andrzej RUDOWSKI

The Three Seas Initiative Investment Fund

Towards the operationalization
of the Initiative?



Reviewed by
prof. dr hab. Tomasz Grzegorz Grosse

Translation and proofreading
Julita Wilczek
VERTE Biuro Tłumaczeń Agnieszka Waszkiewicz

Typographic design, composition and typesetting by
Vita

Cover design by
Krzysztof Kopania

© Copyright by Wydawnictwo Naukowe UKSW, Warszawa 2024

ISBN 978-83-8281-445-3
978-83-8281-444-6 ebook



Wydawnictwo Naukowe Uniwersytetu Kardynała Stefana Wyszyńskiego
w Warszawie
01-815 Warszawa, ul. Dewajtis 5, tel. 22 561-89-23
e-mail: wydawnictwo@uksw.edu.pl, www.wydawnictwo.uksw.edu.pl

Print and binding
Volumina.pl Sp. z o.o.

Table of Contents

Introduction	7
1. The origins and objectives of the Three Seas Initiative – new challenges and a new format	9
A. From periphery to periphery?	9
B. Establishment of the Three Seas Initiative	13
C. The priorities and instruments of the Three Seas initiative	14
2. Establishment and role of the Three Seas Fund	21
A. Establishment of the Fund	22
B. Objectives and activities of the Fund	24
C. Commitments by the Three Seas states	27
D. Attitudes of the Three Seas states towards the Fund	29
3. Structure and organizational principles	33
A. General Meeting	34
B. Management Board	35
C. Supervisory Council	38
D. External services	42
4. Fund operations	45
A. Investors	48
B. Investment process	51
C. Investment criteria	53
D. Investment projects	55
Summary	61
Bibliography	65

Introduction*

Central and Eastern Europe with its complex, dramatic history and “excess” of nations, cultures, resentments, and aspirations is a challenge even for itself. Even more so for those looking in from the outside. On the one hand, complex and often incomprehensible mosaics. On the other hand, a region with ever more visible potential: more than 111 million inhabitants, doubled GDP over the last 30 years, a rapidly growing role in international trade, and an advanced process of integration with the West.¹

The Three Seas Initiative established in 2015 can be seen as a step toward deeper internal integration to make the region a meaningful whole, a partner for global cooperation. A partner not just for the nearest neighbors, but also for the world’s leading economic powers. So far, the United States has been the closest ally to the Initiative. American influence in the region is stronger than even Germany’s, despite the latter being more economically active in the region. Russia and China cannot even compare.

Foreign interest in the region is not always a given, as complex (geo) political processes have shown in the past decade. Central and Eastern Europe, as a periphery, undergoes many changes in its stakeholders, vectors, and power dependencies. To escape this paradigm, the region has to become independent and increase its global importance.

This analysis serves to present the creation, structure, and activities of the Three Seas Fund as a key instrument developed and launched so far in the framework of the Initiative. The background of the origins and objectives of the Three Seas initiative is briefly outlined.

* The monograph was published in 2021 in Polish language version as a report titled *Fundusz Trójmorza. W stronę instytucjonalizacji Inicjatywy?*, the current one is its translated and upgraded edition issued under the Publisher’s consent.

¹ R. Zenderowski, *Geopolityka Trójmorza*, Warsaw 2021, pp. 22-39.

1. The origins and objectives of the Three Seas Initiative – new challenges and a new format

A. From periphery to periphery?

For centuries, the countries of Central and Eastern Europe have been a direction for the expansion of Turkey, Austria, Russia, and Germany. Its apogee was the arrangements of the 1815 Vienna Congress, which confirmed the division of the region between Turkish, Russian, and German/Austrian elements. The First World War was the catalyst for radical changes in this area, resulting in the empowerment of the majority of the nations of the region.

It should be pointed out that, **the limitation of the expansion of powers did not result from a shift in their policy towards the neighbors, but rather from their weakening, permanent – as in the case of Turkey and Austria, or temporary – in revolutionary Russia (and in the 1990s with the fall of communism), and in Germany after the outcomes of the First and Second World War.**

A special period in the history of Central and Eastern Europe was the years after 1945 under the control of the USSR. Moscow's ambition was to create an alternative to the West (so called Immanuel Wallerstein's core), which was to play an equivalent role in international relations both in shaping ideas and having political, economic, and military influences.

This attempt was successful to a certain extent. The satellite functions assigned to the states and the actual economic autonomy of Comecon vis-à-vis the West have given, among others, Poland a status in international relations that seemingly went beyond the periphery (though still

dependent on Moscow), particularly in relation to the so-called Third World countries. Eventually, however, Moscow's attempt failed and led to, as Andrzej Nowak accurately described, the disappearance of the so-called Second World.¹

Poland, like the other countries of Central and Eastern Europe, faced the need to redefine its political, economic, and military position after 1989. The political changes initiated at that time indicated the dominant pro-Western reorientation of most of the societies and governments of the region, which resulted in the dissolution of the Council for Mutual Economic Cooperation (economic alliance) and the Warsaw Pact (military alliance), created under the auspices of the USSR. This did not result in automatic entry into Western structures. However, it opened a long and difficult process of convergence which was completed by the accession of most of the countries of the region into the European Union and the North Atlantic Treaty Organization.

The economic reforms carried out in the region were based on the neo-liberal paradigm defined in the 1970s and 1980s and based on the proposals of the monetarist school, which replaced the once-dominant fiscalism of M. Keynes. In the mainstream optics, those changes were indispensable.² A package of economic reforms introduced in Poland by Leszek Balcerowicz became the symbol of this transformation for the entire region, though by the opponents it was dubbed “shock therapy.”

The opening up of financial markets, liberalization of international trade, deregulation, privatization, and the liquidation of unprofitable companies were considered indispensable elements of economic modernization. On the one hand, this modernization brought **fast economic growth, increased direct foreign investment, and a return of confidence from the West** (despite Poland going practically bankrupt

¹ See: A.W. Nowak, *Tajemnicze zniknięcie Drugiego Świata. O trudnym losie półperyferii*, in: *Polska jako peryferie*, ed. by T. Zarycki, Warsaw 2016, pp. 86-104.

² Edmund Wnuk-Lipiński, on the verge of transformation, framed political disputes over the reform scenario in Poland in a dichotomy of imitators versus revolutionaries – in line with the then-widespread belief that modernisation would be non-alternative according to Western models, supporters of an independent search for a development path adequate to Polish realities were considered radicals. See: E. Wnuk-Lipiński, *Rozpad połowiczny. Szkice z socjologii transformacji ustrojowej*, Warsaw 1991, pp. 159-167.

in 1989). **On the other hand, it eliminated entire sectors of the economy, resulted in high unemployment rates, impoverished a significant part of society, and started large-scale economic emigration.**

The collapse accompanying the transformations continues to have a social (and political) impact on the present day. **The nature of the changes that affected Central and Eastern Europe has been described in many ways. Krzysztof Jasiiecki has proposed four ways to interpret those changes:**

1. **Modernization** – according to this interpretation, the CEE region is “late to the global capitalist party” and condemned to a long, perhaps **endless pursuit of the West**, further hampered by the periphery and communist heritage of this part of Europe.
2. **Dependency** – related to the above, but this interpretation sees the main **problem in the region’s newly formed capital, technological, and political dependencies on the West**, which will not allow the region to ever catch up with the West and join the Wallerstein’s core.
3. **Regionalism** – this interpretation points out that the region is experiencing progressive stratification of development within most countries of the region, **resulting in the separation of modern large cities** (effectively imitating modernity) **and backward provinces** (open-air museum).
4. **Political discourse** – which, depending on the country at different scales, appears in **reflection and discussion on the nature and consequences of the changes of the 1990s and the resulting challenges for economic development for the future.**³

In the first interpretation, the modernization challenges are endogenous, in the second – exogenous. The third focuses on the consequences of modernization, resulting from the post-colonial character of the region’s development. The symbol of the latter are political projects in Poland and Hungary, which according to Edmund Wnuk-Lipiński are revolutionary in nature and based on an historical interpretation similar to the dependency interpretation described above.

³ K. Jasiiecki, *Nowa peryferyjność w perspektywie różnorodności kapitalizmu. Przykład posocjalistycznych państw*, in: *Polska jako peryferie*, op. cit., pp. 59-62.

All these interpretations correspond more or less to the concept of geoeconomics proposed by Edward Luttwak. According to this concept, after the end of the Cold War, military power was replaced by economic power, hence it is the size of the economy that determines each country's position globally and regionally. This idea is perfectly encapsulated in the title of Tomasz Grzegorz Grosse's book *Fuel for domination*.⁴ If this optics is applied, it is easy to see that **after 1989 the region became a "subject" of interest and expansion for both the West, especially Germany (multisectoral) and Russia (energy raw materials).**

Since the beginning of 2022, Russia has been trying to prove that a military power can undermine the existing paradigm of geoeconomic supremacy. However, it is worth remembering that Russia's military attack has been motivated by the need to protect its economic interests in the region, which have been threatened by other powers, previously not much interested in Central and Eastern Europe. In practice then, Russians confirm the validity of geoeconomic concepts.

In the region, Russia fights primarily to maintain its position as a dominant supplier of energy sources and nuclear technologies. Against itself it has the collective economic interest of EU core countries (Germany, France, Benelux, and Austria), and increasingly the economic interest of the United States and China.

The global role and importance of those latter countries is greater than any of the European players' (including the EU as a whole). Moreover, those countries have much higher development potential than any of their European counterparts. This includes factors such as demography, the economy (actual dominance in the IT sector), military importance (in particular the ability to project power), and financial resources.

The dynamically developing Central and Eastern Europe (together with Georgia and Ukraine) is gaining importance on the European economic map and due to its ambitious infrastructural investment plans, the region has become an attractive direction for economic expansion. Such an expansion for some countries might also be seen as a way of maintaining their geopolitical status quo. **Chinese interest in this region and violently promoted Russian aspirations to recover influence constitute**

⁴ T. G. Grosse (ed.), *Paliwo dla dominacji*, Warsaw 2020.

a challenge for the United States, a strategic partner for the region and guarantor of regional security through NATO.

For China, the region is a gateway to the markets of Western Europe and – in particular in the case of the Western Balkans – a training ground for capital and infrastructure investment.⁵ One way to strengthen China's bilateral relations with the countries of Central and Eastern Europe was the 17+1 format (14+1 since the departure of the Baltic states). While the EU and the US pressured the region not to engage in this format, its eventual failure was mostly due to a lack of an attractive offer from the Chinese side for the region.⁶

The US is much more adept at maintaining its influence in the region. Americans do not limit themselves to military cooperation or military technology deliveries. They also compete for telecommunication and energy contracts (5G, nuclear power projects, LNG deliveries).⁷ They are also **sought after as a key partner for the Three Seas Initiative.**

B. Establishment of the Three Seas Initiative

The origins of the Three Seas Initiative (3SI) are partly rooted in the economic and political situation of the region outlined in the previous chapter, and partly in the idea of the Intermarium and the legacy of Polish President Lech Kaczyński. At the same time, as Paweł Kowal and Agnieszka Orzelska-Stączek point out, the 3SI is fundamentally different from the vision of the “Fourth Intermarium” due to the lack of participation of Ukraine.

⁵ A. Widzyk, *FAZ: Supermocarstwa rywalizują o wpływy w Europie Środkowo-Wschodniej*, DW, October 13, 2020, <https://www.dw.com/pl/faz-supermocarstwa-rywalizuj%C4%85-o-wp%C5%82ywy-w-europie-%C5%9Brodkowo-wschodniej/a-55253889> (accessed December 22, 2021).

⁶ M. Przychodniak, *Chiny wobec kryzysu inicjatywy 17+1*, „Biuletyn PISM”, no. 26 (2224), February 9, 2021, https://www.pism.pl/publikacje/Chiny_wobec_kryzysu_inicjatywy_171_ (accessed December 22, 2021).

⁷ W. Jakóbiak, *USA sfinansują atom w Rumunii. Wnioski dla Polski*, BiznesAlert.pl, October 12, 2020, <https://biznesalert.pl/atom-rumunia-usa-polska-ppiej-energetyka-atom/> (accessed December 22, 2021).

The decision to exclude Ukraine was made to facilitate the establishment of the Initiative and the implementation of its goals. It keeps the Initiative within the borders of the European Union and makes it less about Polish geopolitical interests and more about the regional ones. The exclusion of Ukraine, also made the Initiative more attractive to the United States, which despite having an interest in weakening the importance of Russia in the region, was not necessarily interested in strengthening Poland geopolitically (at least before 2022).⁸

As Piotr Bajda notes, “the Three Seas initiative is an original project proposed by the leaders of the region, an autonomous project whose content and format was not imposed or suggested by external actors. We can see support from the US-based think tank – Atlantic Council environment, but the decision-making process was an independent act.”⁹

And it is a compromise that takes into account, as far as possible, all existing regional interests but also (and perhaps above all) tensions that may arise from the new format in the European Union – primarily in Germany, and in the United States.

C. The priorities and instruments of the Three Seas initiative

There are three types of objectives of the Three Seas Initiative.¹⁰

1. The objectives officially declared by the participants in the Initiative, which will be described below.
2. The objectives actually pursued by the participants of the Initiative, which reveal their true interests and involvement and which will be discussed in the following chapters, but only with regard to the Three Seas Investment Fund.
3. The implied objectives of participants of the Initiative, which are the subject of other publications of the Collegium Interethnicum

⁸ P. Kowal, A. Orzelska-Stączek, *Inicjatywa Trójmorza: geneza, cele i funkcjonowanie*, Warsaw 2019, pp. 21-42.

⁹ P. Bajda, *Inicjatywa Trójmorza 2016-2020 in statu nascendi*, Warsaw 2020, p. 4.

¹⁰ P. Kowal, A. Orzelska-Stączek, op. cit., Warsaw 2019, pp. 75-90.

Foundation.

This chapter will also focus on the 3SI instruments, understood here as tools for the development of the Initiative and the achievement of 3SI goals. These tools are primarily announced during the Three Seas Initiative annual summits.

In 2016, in Dubrovnik, Austria, Bulgaria, Croatia, Czechia, Estonia, Hungary, Latvia, Lithuania, Poland, Romania, Slovakia, and Slovenia “endorsed the Three Seas Initiative as an informal platform for gaining political support and organizing decisive action on specific cross-border and macro-regional projects of strategic importance for states involved in the sectors of **energy, transport, digital communication and economy** in Central and Eastern Europe”.¹¹

The areas indicated in the declaration are of key importance for overcoming the region’s backwardness resulting from the communist past and improving regional connectivity, which would benefit the entire European Union. Through the coordination of regional infrastructure investment, CEE countries also hope to move away from the current low-labor-cost development model. It is worth stressing that the first summit of the Three Seas Initiative was attended by a representative of the Chinese government, Liu Haixing, as well as a representative of the US authorities, Gen. James L. Jones Jr.

One year later in Warsaw, the objectives defined in Dubrovnik were more clearly aligned with the European Union’s policies: “The Three Seas Initiative has the following priorities: Strengthening the transport links of our region to develop and further integrate into the Trans-European Transport Network (TEN-T), meeting the objectives of the Union’s energy policy, promoting the business character of joint economic projects, full synergy with EU policies”¹².

¹¹ *Wspólna deklaracja w sprawie Inicjatywy Trójmorza Dubrownik 2016*, prezydent.pl, <https://www.prezydent.pl/aktualnosci/wizyty-zagraniczne/wspolna-deklaracja-w-sprawie-inicjatywy-trojmorza,2909> (accessed December 28, 2021).

¹² *The Second Summit of The 3 Seas Initiative. Joint Declaration*, prezydent.pl, https://www.prezydent.pl/storage/file/core_files/2021/8/9/e6fc-2d95a32c58f692a31cda9f0b1d7c/ii_szczyt_inicjatywy_trojmorza_final_version.docx (accessed December 8, 2021).

Cooperation in **environmental protection and research and development** have also been added to the list.¹³ It was also decided in Warsaw to organize the **Three Seas Business Forum**, a platform for networking between economic operators. The Warsaw Summit also inspired the **Three Seas Forum of Regions**¹⁴, first held in the summer of 2018. The summit was attended by President Donald Trump, which significantly contributed to the attractiveness of the 3SI format in the region.

At the third summit in Bucharest in 2018, a letter of intent was signed regarding the creation of the **Three Seas Initiative Investment Fund (3SIIF)**. From the institutional perspective, this has been the most significant decision since the Initiative launch. The joint declaration of the presidents concluded that the Fund would “aim at pipelining, supporting and financing of the priority interconnection projects welcomed by the Summit, as well as other future 3SI projects”¹⁵. At the same time, the first **list of priority projects** was announced.

The joint declaration also emphasized the **importance of economic cooperation with the United States of America for the strengthening of transatlantic ties**. Several representatives of the Initiative partners took part in the summit – President of the European Commission Jean-Claude Juncker, German Foreign Minister Heiko Maas, and US Energy Secretary Rick Perry.

The next summit in Ljubljana confirmed the objectives set out thus far and provided an opportunity to present a first summary of the actions taken under the Initiative, the so-called **Progress Report**. It was agreed that the report would be cyclical.¹⁶ Once again, the partners of the Initiative were represented by high-level representatives – President of the European Commission Jean-Claude Juncker, German President Frank-Walter Steinmeier, and US Energy Secretary Rick Perry.

¹³ Ibidem.

¹⁴ So far the Forum was held three times – in 2018, 2021 and 2023.

¹⁵ *Joint Declaration of the Third Summit of the Three Seas Initiative*, 3seas.eu, <http://three-seas.eu/wp-content/uploads/2018/09/BUCHAREST-SUMMIT-JOINT-DECLARATION.pdf> (accessed December 28, 2021).

¹⁶ *Wspólna Deklaracja Czwartego Szczytu Trójmorza*, prezydent.pl, <https://www.prezydent.pl/aktualnosci/wypowiedzi-prezydenta-rp/wystapienia/wspolna-deklaracja-iv-szczytu-inicjatywy-trojmorza,3942> (accessed December 28, 2021).

Due to the pandemic, the Estonian summit was organized in a hybrid format. At the event, the United States of America announced its readiness to commit to the Three Seas Initiative Investment Fund a sum of no less than 30 per cent of the funds committed by the Three Seas states and up to a maximum of USD 1 billion. At the same time, the Polish Development Bank (Bank Gospodarstwa Krajowego) declared an increase of EUR 250 million in its commitment to the Fund.

The Estonian summit also included **a meeting of government 3SI plenipotentiaries, who typically hold the rank of the Deputy Foreign Minister**, which incorporated the executive component of the participating states into the format. The summit also announced a document titled *Smart Connectivity*, which focused on Estonia's vision to develop a digital component in key infrastructure projects. This digital layer would support new business and technology solutions such as real-time economic governance, reliable energy networks, intelligent logistics and traffic management. In this way, investments in energy and transport could be better equipped for future challenges and improve the competitiveness of the region.¹⁷

The sixth Three Seas Summit organized by Bulgaria traditionally confirmed the key Initiative's objectives. It has also seen a significant increase in the number of projects submitted by the Three Seas participating states – from 48 projects identified in Bucharest to 90 in Sofia.¹⁸ It should be noted, however, that the priority project list also includes projects that have currently little chance of implementation.

The 3SI partners were represented at the highest level by the President of the United States of America Joe Biden (video connection) and the German President Frank-Walter Steinmeier. For the first time, the summit was attended by the President of Greece Katerina Sakellariopoulou. This openness to new partners was also included in the final joint declaration, which encouraged cooperation with states and institutions other than the US, Germany, and the EU in the implementation of regional

¹⁷ See: *Smart Connectivity*, 3seas.eu, <https://3seas.eu/about/smart-connectivity>. *Smart Connectivity. Vision paper*, https://media.voog.com/0000/0046/4166/files/Smart_Connectivity.pdf (accessed December 29, 2021).

¹⁸ *Database of the Three Seas Interconnection Priority Projects*, 3seas.eu, <https://projects.3seas.eu/> (accessed December 30, 2021).

priority projects. However, the statement limited the group of potential partners to countries that share democratic values close to the Three Seas countries, as well as their European and transatlantic orientation.¹⁹

In addition, to help implement economic cooperation **“investment agencies have signed agreements on the setting up of innovation support networks, and the chambers of commerce of the 3SI countries have signed agreements on their own network of co-operations.”** The final declaration also **established the so-called Sherpa format**, meaning “meeting between the summits attended by 3SI National Coordinators to discuss positions and prepare documents, which would facilitate agreement during the next annual meetings of the leaders of the states.”²⁰

The next, seventh, summit was hosted by Latvia and was focused on issues related to financing of the Initiative’s projects.²¹ This resulted, among other things, in **the reaffirmation by the United States government of its earlier commitment to the Three Seas Initiative Investment Fund. As agreed, the U.S. International Development Finance Corporation (DFC) was to commit up to USD 300 million** to finance projects that enhance energy security and improve connectivity in the Three Seas region.²²

The key development of the summit, however, was the partial admission of Ukraine to the Initiative. Since the 3SI is format for EU member states only, Ukraine was granted a newly created participating partner status, which is open to other countries on the path to EU membership. Another notable event of the Latvian 3SI presidency is the

¹⁹ *Joint Declaration of the Sixth Summit of the Three Seas Initiative*, 3seas.eu, <https://3seas.eu/event/joint-declaration-of-the-sixth-summit-of-the-three-seas-initiative> (accessed December 29, 2021).

²⁰ J. Pieńkowski, *Szósty szczyt Inicjatywy Trójmorza w Sofii*, „Komentarz PISM”, no. 56/2021, <https://www.pism.pl/webroot/upload/files/files2021/Komentarz%20PISM%20nr%2056-2021.pdf> (accessed December 30, 2021).

²¹ Ł. Lewkowicz, M. Gołębiewska, *Inicjatywa Trójmorza przed szczytem w Rydze: inspirowana politycznie, napędzana komercyjnie*, <https://ies.lublin.pl/komentarze/inicjatywa-trojmorza-przed-szczytem-w-rydze-inspirowana-politycznie-napedzana-komercyjnie/> (accessed January 7, 2022).

²² *U.S. International Development Finance Corporation and the Three Seas Initiative Investment Fund agree to term sheet for up to US\$300 million in financing*, Three Seas Initiative Investment Fund, June 20, 2022, <https://3siif.eu/news/u-s-international-development-finance-corporation-and-the-three-seas-initiative-investment-fund-agree-to-term-sheet-for-up-to-us300-million-in-financing> (accessed February 25, 2024).

establishment of the **Three Seas Civil Society Forum**, which took place in May 2022 in Riga.²³

The eighth Three Seas Initiative summit was held in Bucharest in September 2023. The comments following the event focused primarily on the format expansion by **admission of Greece**. This is a clear signal of Greece's support for the idea of developing north-south transport routes. At the same time, **Moldova was granted the status of participating partner**. However, these undisputed successes of the Romanian summit were accompanied by lack of progress on other fronts.

Despite its growth, the Initiative still lacks a secretariat to coordinate its activities. Moreover, the Three Seas Initiative Investment Fund has exhausted its modest investment capacity and additional funding is not expected. A symbolic attempt to break this impasse is the readiness of the Initiative countries to create more funds, **including a Three Seas Innovation Fund**, which was announced in the summit's joint declaration.²⁴

Independently of the Bucharest summer, a memorandum of understanding on the establishment of the **Three Seas Universities Network** was signed during the 3rd Three Seas Forum of Regions in Lublin. The network so far consists of 13 universities from Poland, Bulgaria, Croatia, Estonia, Lithuania, Latvia, Romania, Slovakia, Slovenia and Ukraine. It aims to be a tool for establishing and conducting regular contacts, undertaking joint research and implementation of innovations in the quality of education, supporting commercialization of the research results and undertake activities benefiting local and regional communities.²⁵

Next Three Seas Initiative summits will be held in Lithuania (April 2024) and in Hungary (2025); for the first time since the Initiative's establishment the summit host is known more than a year in advance.

²³ *The Three Seas Initiative Civil Society Forum 2022 Connecting States, Regions, and Societies: Debating, Innovating, and Acting. Policy recommendations*, https://media.voog.com/0000/0046/4166/files/Policy_Recommendations.pdf (accessed February 15, 2024).

²⁴ *Joint Declaration of the Eighth Summit of the Three Seas Initiative (Bucharest, 6-7 September 2023)*, 3SI Research Center, <https://3si.politic.edu.pl/joint-declaration-of-the-eighth-summit-of-the-three-seas-initiative-bucharest-6-7-september-2023/> (accessed February 15, 2024).

²⁵ *Inauguracja Sieci Uniwersytetów Trójmorza*, KUL, <https://3sun.kul.pl/aktualnosci/inauguracja-sieci-universytetow-trojmorza/> (accessed February 15, 2024).

Table 1. The objectives of the Three Seas initiative as declared, together with the date and place of their official publication.

No.	Objective	Conception date and place
1.	cross-border and macro-regional energy projects	August 25-26, 2016 – 1st Three Seas Summit, Dubrovnik
2.	cross-border and macro-regional transport projects	August 25-26, 2016 – 1st Three Seas Summit, Dubrovnik
3.	cross-border and macro-regional digital communication projects	August 25-26, 2016 – 1st Three Seas Summit, Dubrovnik
4.	cross-border and macro-regional economic projects	July 6-7, 2017 – 2nd Three Seas Summit, Warsaw
5.	cross-border and macro-regional environmental projects	July 6-7, 2017 – 2nd Three Seas Summit, Warsaw
6.	cross-border and macro-regional R&D projects	July 6-7, 2017 – 2nd Three Seas Summit, Warsaw

Table 2. The instruments of the Three Seas Initiative, together with the date and place of their official publication

No.	Instrument	Conception date and place
1.	The Three Seas Business Forum	July 6-7, 2017 – 2nd Three Seas Summit, Warsaw
2.	The Three Seas Forum of Regions	N/A
3.	The Three Seas Initiative Investment Fund	September 17-18, 2018 – 3rd Three Seas Summit, Bucharest
4.	List of priority projects	September 17-18, 2018 – 3rd Three Seas Summit, Bucharest
5.	Progress Report	June 4-5, 2019 – 4th Three Seas Summit, Ljubljana
6.	CEEplus stock index	September 4, 2019 – Economic Forum in Krynica
7.	Meetings of the Three Seas foreign ministers	October 19-20, 2020 – 5th Three Seas Summit, Tallinn
8.	Three Seas Initiative Parliamentary Forum	October 19-20, 2020 – 5th Three Seas Summit, Tallinn
9.	Three Seas Young Parliamentarians Forum	October 19-20, 2020 – 5th Three Seas Summit, Tallinn
10.	Economic Network of the Three Seas Regions	June 29, 2021 – 2 nd Three Seas Forum of Regions, Lublin
11.	Innovation support networks	July 8-9, 2021 – 6th Three Seas Summit, Sofia
12.	Co-operation support networks	July 8-9, 2021 – 6th Three Seas Summit, Sofia
13.	Sherpa format – coordinators' meetings	July 8-9, 2021 – 6th Three Seas Summit, Sofia
14.	The Three Seas Initiative Civil Society Forum	June 20-21, 2022 – 7th Three Seas Summit, Riga

2. Establishment and role of the Three Seas Fund

Three Seas Initiative Investment Fund (the Fund, 3SIIF) is a key financial instrument within the Three Seas Initiative. The Fund was established to finance commercial infrastructure investments in the Three Seas region in energy, transport, and digital sectors.

The Fund is based on two key premises: 1) that infrastructure investments are crucial for the further economic development of the region, 2) and that the region has enormous potential that is still not fully realized by investors. The Fund aims to attract additional capital for infrastructural investments, and through those investments help stimulate the GDP growth and raise the standard of living within the region.

These key premises are supported by independent experts, for example, in the IMF policy paper *Infrastructure in Central, Eastern, and Southeastern Europe. Benchmarking, Macroeconomic Impact and Policy Issues*¹ and in the Polish Economic Institute's report *Building closer connections. The Three Seas region as an economic area*². Therefore, the Fund should not be dismissed as a purely political project. However, the Fund cannot be considered fully independent of politics either since its core sponsors are state institutions, and central governments are significantly involved in its promotion.

¹ A. Ari et al, *Infrastructure in Central, Eastern, and Southeastern Europe: Benchmarking, Macroeconomic Impact, and Policy Issues*, IMF, September 28, 2020, <https://www.imf.org/en/Publications/Departmental-Papers-Policy-Papers/Issues/2020/09/25/Infrastructure-in-Central-Eastern-and-Southeastern-Europe-Benchmarking-Macroeconomic-Impact-49580> (accessed December 31, 2021).

² K. Popławski, J. Jakóbcowski, *Building closer connections. The Three Seas region as an economic area*, Warsaw 2022, <https://pie.net.pl/wp-content/uploads/2022/01/PIE-Three-Seas.pdf> (accessed December 31, 2021).

This specific essence of the Fund is embodied by the slogan “politically inspired, commercially driven”³, which the Fund representatives reiterate at every promotional event and conference. How this dual nature of the Fund looks in practice is described in detail in this and the following chapters.

These chapters were based only on the information that is publicly available and accessible online (interviews, documents, financial reports, conference recordings and photos). These chapters were originally written in Polish in December 2021. Current version refer to the state of the Fund as of November 10, 2023 (unless otherwise indicated in the text).

A. Establishment of the Fund

The idea of the first regional investment fund was conceived by the Polish Development Bank (Bank Gospodarstwa Krajowego, BGK) during the 2017 Three Seas Initiative Summit in Warsaw.⁴ The proposed fund was modeled on the Marguerite Funds and the Polish Fund for Growth Funds, and its key goal was to support the development of regional cooperation and infrastructural investments postulated by the Initiative.⁵

The letter of intent to establish the Fund, as mentioned in chapter 1, was signed during the Business Forum accompanying the 3SI Bucharest Summit in September 2018. The letter had six signatories: Croatia, Czechia, Latvia, Poland, Romania, and Slovakia.⁶

All the Initiative participating states (except for Austria, which expressed no interest in the project) were involved in the development

³ See: G. Tait, *Three Seas Virtual Summit, Smart Money*, starts at 13:50, October 19, 2020, <https://www.youtube.com/watch?v=GA56ayy5vGM> (accessed December 31, 2021).

⁴ See: P. Nierada, *The Second Three Seas Stock Exchanges Conference – day 2*, starts at 02:04:05, October 08, 2021, <https://www.youtube.com/watch?v=GZ208tKRDTY> (accessed December 31, 2021).

⁵ *Fundusz nabiera rozpędu*, „Gazeta Polska Codziennie”, <https://gpcodziennie.pl/793339-fundusz-nabiera-rozpedu.html> (accessed December 31, 2021), P. Nierada, *The Second Three Seas Stock...*, op. cit.

⁶ *Three Seas Initiative (3SI)*, Republic of Estonia – Ministry of Foreign Affairs, <https://vm.ee/en/three-seas-initiative-3si> (accessed December 31, 2021).

of the Fund's strategy.⁷ The Fund was incorporated on May 29, 2019. The registration took place in Luxembourg (city) under the number B 234.989. The place of the registration was not arbitrary. Operating under the Luxembourg law lends credibility to the Fund, while registering the Fund outside the region allows for its neutrality towards the core sponsors and makes it independent of their current political situation.⁸

The founding shareholders of the Fund are Poland and Romania, represented respectively by Polish Development Bank (BGK) and Exim Banca Romaneasca (formerly known as Eximbank Romania and Banca de Export-Import a Romaniei). According to BGK's President of the Management Board, Beata Daszyńska-Muzyczka, these two institutions were the co-founders because they were the first to internally process their investment to the Fund.⁹ Still, it should be added that both of these institutions were also most invested in the Fund's establishment – BGK as its initiator, and Exim Banca as the institution representing the state where the letter of intent was signed.

The founders declared capital commitments in the total amount of EUR 520 million, of which EUR 500 million was declared by BGK, which makes it the Fund's largest shareholder to this day. However, both institutions did not sign the subscription agreements until February 27, 2020.¹⁰

Those first subscriptions took place in Riga, where the appointment of the Investment Advisor was also announced and the Fund became fully operational. The Investment Advisor role was given to Amber Fund Management Limited, specializing in infrastructure investment management, particularly in the energy, transport, and digital sectors.¹¹

⁷ P. Nierada, *The Second Three Seas Stock...*, op. cit., *Inicjatywa Trójmorza – opis projektu i skrót debaty*, Forum Młodych Dyplomatów, June 02, 2021, <http://diplomacy.pl/pl/blog/europa-wschodnia/item/577-inicjatywa-trojmorza-opis-projektu-i-skrót-debaty> (accessed December 31, 2021).

⁸ P. Nierada, *The Second Three Seas Stock...*, op. cit.

⁹ B. Daszyńska-Muzyczka, *Three Seas Virtual Summit*, *Smart Money*, starts at 3:38, October, 19, 2020, <https://www.youtube.com/watch?v=GA56ayy5vGM> (accessed December 31, 2021).

¹⁰ *Annual report and audited financial statements For the financial year ended 31 December 2022*, Three Seas Initiative Investment Fund S.A. SICAV-RAIF, July 07, 2023, p. 15. (accessed November 10, 2023).

¹¹ *Amber Appointed Exclusive Adviser to Three Seas Fund*, Amber Infrastructure, March 04, 2020, <https://amberinfrastructure.com/news/press-releases/2020/>

B. Objectives and activities of the Fund

The exclusive purpose of the Fund mentioned directly in its articles of association is “is the collective investment of the funds available to it in assets with the aim of spreading the investment risks and affording its shareholders the results of the management of its assets.” How this purpose is fulfilled is left to the discretion of the managers of the Fund, to the extent permitted under Luxembourg law and terms and limits set out in the Fund’s Memorandum.¹² The Memorandum is not publicly available, but some of its content (like the Fund’s objectives and investment criteria) can be deduced from the presentations shown by the 3SIIF representatives at business conferences or from the interviews on 3SIIF. The latter are primarily given by the BGKS’s President and First Vice President of the Management Board, who serve as the Chairperson and Supervisory Council member of the Fund.¹³

Fund’s objectives:

- To accelerate the economic development of the Three Seas region by expanding state-of-the-art infrastructure.
- To improve connectivity and cooperation throughout the region on the North-South axis.
- To support investments in supply-critical long-term assets.
- To increase the amount of investment funding in the region.
- To increase the share of private capital in financing infrastructure investments.
- To accelerate economic recovery after the COVID-19 pandemic.

Fund’s activities:

- Investing in commercially viable projects in the Three Seas Region.

amber-infrastructure-appointed-exclusive-adviser-to-three-seas-initiative-investment-fund/ (accessed December 31, 2021).

¹² *Restated Articles of Association of the Three Seas Initiative Investment Funds S.A. SICAV-RAIF*, Registre de Commerce et des Sociétés Luxembourg, B 234.989, Article 5, June 30, 2020, (accessed December 31, 2021).

¹³ P. Nierada, *The Second Three Seas Stock...*, op. cit.

- Investing in cross-border projects.
- Investing in critical infrastructure.
- Bringing all states of the region into the Fund.
- Attracting private investors and international financial institutions to the Fund.
- Promoting the region's investment potential and making the investment process easier for investors not yet present in the region.

As shown above, financing the projects from the Three Seas Interconnection Priority Projects is not among the Fund's objectives, although many people believe that. This misconception probably comes from the imprecise wording used in the final declaration of the Bucharest Summit.¹⁴ While these priority projects are not entirely excluded from 3SIIF investment, they rarely meet the essential requirement, which is being commercially viable (meaning they offer no profit to investors). These projects also often require more funding that would ever be available in the Fund's budget.

The Fund's objectives are linked to the economic challenges facing the region. The primary challenge is the infrastructure gap between the Three Seas region and the rest of the European Union, especially Western Europe. In 2018, the authors of the SpotData report estimated that to bridge this gap in three sectors alone (energy, transport, and digital infrastructure), the region needs to invest EUR 500-600 billion by 2030. Three Seas states cannot cover such expenses on their own.¹⁵

Particularly severe underinvestment in the region's infrastructure is visible on its North-South axis, inhibiting cooperation within the Three Seas region. This underdevelopment of regional connections results from the deliberate policy of the Soviet Union, which favored the integration of the Soviet bloc with its center (East-West axis) and discouraged the development of regional ties.¹⁶ It was further consolidated after the 1989 political transformation due to the re-orientation of the regional

¹⁴ *Joint Declaration of the Third Summit of the Three Seas Initiative*, op. cit.

¹⁵ P. Nierada, *The Second Three Seas Stock...*, op. cit., *Perspectives for Infrastructural Investments in the Three Seas region*, SpotData, 2019, https://3siif.eu/wp/wp-content/uploads/2019/11/SpotData_Report_Three-Seas-region.pdf, p. 13 (accessed December 31, 2021).

¹⁶ *Perspectives for Infrastructural Investments in the Three Seas region*, op. cit., p. 21.

economies toward the West, particularly Germany. Consequently, travel time for comparable distances can be two or three times longer today when traveling North to South than East to West.¹⁷

As mentioned above, the lower number of infrastructure investments in the region is linked to the lack of necessary capital. However, lack of funds for investment is not a challenge unique to the Three Seas region. The solution is to find new sources of investment financing. Eventually, the Three Seas states should strive to achieve a financing structure similar to Western Europe, where only 30-40 percent of an infrastructural investment is covered with public funds, and the remaining with private funds (including those of state-owned companies). A greater share of private capital is particularly important now as the inflow of the EU structural funds substantially decreases; in the past these funds financed almost half of all infrastructure investments in the Three Seas region.¹⁸

Infrastructure investments play a key role in increasing the region's competitiveness, thus directly impacting its economic development. Particularly important are investments in regional transport networks (roads, railways, waterways, airways), energy distribution, telecom, as well as the digital transformation of transport and energy sectors. These types of investments not only raise the regional quality of life but are also one of the key aspects foreign investors consider when deciding on direct investments.¹⁹

By combining characteristics of emerging and developed markets, the Three Seas region offers investors relatively high yet safe rates of return on their investment. However, the main disadvantage of the region is that it is comprised of many small states, each with a different language, economic prospects, and legal system. Through the 3SIIF, an investor gains access to the entirety of the region's economic potential and has the investment process and risk management taken care of by a professional team. In the long term, there are hopes that the success of the Fund could encourage more private investors to invest in regional infrastructure and lay the ground for similar funds in the future.²⁰

¹⁷ Ibidem.

¹⁸ Ibidem, p. 14

¹⁹ Ibidem, p. 13.

²⁰ G. Tait, *Three Seas Virtual Summit*, op. cit.

C. Commitments by the Three Seas states

The main goal of the Fund in the first two years of its operation was bringing on board public investors from all 3SI states. That was facilitated by the declaration made by the US Secretary of State Mike Pompeo in February 2020 in which he announced the readiness of the United States to allocate up to USD 1 billion for the development of infrastructure in the Three Seas region. This declaration was as pivotal to the Three Seas Initiative Investment Fund as President Trump's support was to the Three Seas Initiative. That is, it convinced the states of the region of the viability of the 3SIIF project and thus prompted them to become more involved.²¹

Throughout 2020, regular meetings regarding the Fund were held with representatives of the each 3SI state development bank or its equivalent.²² On September 16, 2020, Estonian Ministry of Finance and the Latvian Attīstības finanšu institūcija Altum (ALTUM) joined as first regional investors, not counting the founding shareholders.²³

On October 19, during the Three Seas Initiative Summit in Tallinn, BGK announced an increase of its commitment to the Fund by EUR 250 million, to a total of EUR 750 million. This is the only increase in the investor's commitment so far.²⁴

On December 3, Hungary's Magyar Export-Import Bank (part of EXIM Hungary) and Slovenia's Slovenska izvozna in razvojna banka (SID banka) committed to the Fund.²⁵ Before the end of the year, on December 15 Bulgaria's Българска банка за развитие (BDB) managed to commit to the Fund as well.²⁶

²¹ See: P. Kuusik, *Estonia and the Three Seas Initiative. A Change of Heart and Political Winds*, "Visegrad Insight", June 15, 2020, <https://visegradinsight.eu/estonia-and-the-three-seas-initiative/> (accessed December 31, 2021), V. Dostál, T. Strážay, Z. Végh, *The perspective of the Czech Republic, Hungary, and Slovakia on the Three Seas Initiative*, June 2021, https://www.amo.cz/wp-content/uploads/2021/06/AMO_The_Perspective_on_the_3SI.pdf, p. 3 (accessed December 31, 2021).

²² *Sprawozdanie Zarządu z działalności grupy kapitałowej Banku Gospodarstwa Krajowego w 2020 r.*, op. cit., p. 42.

²³ P. Nierada, *The Second Three Seas Stock...*, op. cit.

²⁴ *Sprawozdanie Zarządu z działalności grupy kapitałowej Banku Gospodarstwa Krajowego w 2020 r.*, op. cit., p. 32.

²⁵ P. Nierada, *The Second Three Seas Stock...*, op. cit.

²⁶ *Ibidem*.

On January 29, 2021, two more investors from the region made their commitment – the Lithuanian Viešųjų investicijų plėtros agentūra (VIPA, currently INVEGA) and the Croatian Hrvatska banka za obnovu i razvitak (HBOR). They were the last regional investors to join so far.²⁷

In September 2021, Jan Sechter, the Czech government coordinator for the 3SI, declared in an interview with the trimarium.pl that Czechia is ready to join the Three Seas Initiative Investment Fund. The news was to be announced by the end of September, but ultimately did not happen.²⁸ The decision was most likely postponed by the parliamentary elections held on October 8-9, 2021, which brought the change of the government. Despite informal confirmation that money for the Fund has been set aside in Czech Development Bank (Národní rozvojová banka, NRB), there is very little chance that Czechia will eventually commit to the Fund, even despite renewed interest in this 3SI observed in 2023.²⁹

As for Slovakia, there are no public declarations regarding its commitment to the Fund. Unofficially, however, its entry depends on the prior involvement of international institutions such as the European Bank for Reconstruction and Development (EBRD) and the European Investment Bank (EIB) in the Fund,³⁰ which are not likely. A definite lack of interest in the Fund can be seen in the case of Austria. However, BGK representatives stressed in the interviews that this was expected – Austria is in a different economic and infrastructure situation compared to the rest of the region.³¹

Nine states of the region have committed EUR 913 million to the Fund, of which Poland has committed EUR 750 million, Slovenia EUR 23 million, and the other states EUR 20 million each.³² The amount of EUR

²⁷ Ibidem.

²⁸ G. Górny, *Jan Sechter: w sprawie Zielonego Ładu konieczne jest powstanie koalicji zdrowego rozsądku*, Trimarium.pl, September 2021, <https://trimarium.pl/jan-sechter-w-sprawie-zielonego-ladu-konieczne-jest-powstanie-koalicji-zdrowego-rozsadku/> (accessed December 31, 2021).

²⁹ M. Chruściel, *The Czech „awakening” towards the Three Seas Initiative – conclusions from the study visit to Prague*, Instytut Nowej Europy, March 02, 2023, <https://ine.org.pl/en/the-czech-awakening-towards-the-three-seas-initiative-conclusions-from-the-study-visit-to-prague/> (accessed October 31, 2023).

³⁰ V. Dostál, T. Strážay, Z. Végh, *The perspective of*, op. cit., p. 12.

³¹ *Inicjatywa Trójmorza – opis projektu i skrót debaty*, op. cit.

³² P. Nierada, *The Second Three Seas Stock...*, op. cit.

20 million per state is not accidental, as it is the minimum amount that gives a place on the Management Board of the Fund (all Three Seas states have the right to sit on the Council, even if they are not shareholders).³³

The fact that so many regional investors made only a minimum commitment to the Fund may indicate that they are still cautious and remain unconvinced about the benefits it can bring to individual shareholders. While there was a hope that once the first investments were made, the states might feel encouraged to increase their commitments, this has not materialized. It might mean that the political potential of the Fund's investment has been overhyped and will not translate into more public funding which is politically dependent.

D. Attitudes of the Three Seas states towards the Fund

Despite similar commitments, the attitude of each Three Seas state toward the Fund varies. Among the most involved are Poland, Estonia, Bulgaria, and Slovenia. Less active are Romania, Latvia, Croatia, Hungary, and Lithuania. Czechia, Slovakia, and Austria remain the least active.

Poland – the initiator, co-founder, and main investor in the Fund. The Fund enjoys support at both the presidential and governmental levels (particularly the Ministry of Foreign Affairs). BGK plays a leading role in promoting the Fund – all mini-conferences on the Fund, domestic and foreign events, as well as Business Forums at the 3SI Summits are frequented by high-level BGK representatives. Poland is the location of the first 3SIIF investment – Cargounit, as well as the last one to date – R.Power.

Estonia – although initially skeptical, Tallinn has become one of the Fund's strongest advocates since February 2020. The support further increased after one of the Fund's investments was located in Estonia. Estonia regularly holds events promoting the Fund and investments in the region. However, it still has not appointed its representative to the Management Board. Also, since April 2023, Estonia does not

³³ Ibidem.

have a representative at the Supervisory Council either. Estonia is the location of two 3SIIF investments – Greenergy Data Centers and Energy.

Bulgaria – after the initial relative lack of interest, the state managed to join the Fund in just four months and, despite a change of government in 2021, organized a very well-received conference promoting the Fund and a 3SI Business Forum. Top-level politicians, including the Bulgarian president, were involved in the events, indicating broad and cross-party support for the project. Bulgaria is the location of two 3SIIF investments – Port of Burgas and Energy.

Slovenia – was the only state other than Poland to commit more than EUR 20 million to the Fund. It was also the first to organize a mini-conference of the Fund during the COVID-19 pandemic, paving the way for the Fund's promotion in hybrid form. It is the location of one 3SIIF investment – Energy.

Romania – although it played a key role in the establishment of the Fund and was the first to organize a promotional mini-conference, its involvement is currently not very visible. Not to mention that its commitment hardly corresponds to Romanian economic potential. Nevertheless, apart from Poland, Romania has the most representatives on the Supervisory Council and the Management Board, which makes it relatively more involved in the Fund. Romania is the location of three 3SIIF investments – Energy, Cargounit, and R.Power. Additionally, in 2022, the Fund has signed an agreement to invest in greenfield gas infrastructure in Romania with Transgaz SA, but this has not been concluded yet.³⁴

Latvia – its involvement in the Fund is not particularly visible. Nevertheless, since September 2019, it has had its representative in the Supervisory Council (though since June 2023, no Latvian sits on this Board). It was also the first non-founding state to organize a mini conference to promote the Fund, one of the first two non-founding states to join the Fund. There are no 3SIIF investments in Latvia yet.

Croatia – although it is a co-founder of the Three Seas Initiative, its decision to become involved in the Fund came late, joining only

³⁴ *Three Seas Initiative Investment Fund signs agreement to invest in greenfield gas infrastructure in Romania*, Three Seas Initiative Investment Fund, May 24, 2022, <https://3siif.eu/news/three-seas-initiative-investment-fund-signs-agreement-to-invest-in-greenfield-gas-infrastructure-in-romania> (accessed November 22, 2023).

in January 2021. This late commitment was due to several reasons – the financial challenges resulting from two earthquakes in 2020, the presidential election that replaced the Three Seas founder Kolinda Grabar-Kitarović with a Three Seas skeptic Zoran Milanović, and the parliamentary campaign, which took all the political attention in the first half of 2020. Eventually, the decision to invest was made possible due to the people from the circle of the former Croatian president that populated the Croatian Ministry of Foreign Affairs, ensuring its continuing involvement in the Three Seas Initiative despite its presidential format. There are no 3SIIF investments in Croatia yet.

Hungary – at the declarative level, Hungary often emphasizes its interest in the Three Seas Initiative and the Fund, emphasizing their complementarity with Hungarian strategic goals.³⁵ It is noteworthy, however, that Hungary chose to organize a mini-conference on the Fund as a closed-door event, and the information about it was published only after the fact.³⁶ This lack of promotion could indicate that the Fund is not as high a priority as Hungarian declarations suggest. There are no 3SIIF investments in Hungary yet.

Lithuania – has long delayed joining the Fund, but its involvement in Three Seas affairs steadily increases due to the determination of the Ambassador at large for connectivity, Gediminas Varvuolis, and the change of government in Vilnius in December 2020. Lithuania joined as one of the last two regional investors and was the last to organize a promotional mini conference (in November 2021). Since May 2023, Lithuania has had no representative at the Supervisory Council. There are no 3SIIF investments in Lithuania yet.

Czechia – despite several declarations that Prague is close to investing in the Fund, there is still no formal commitment. It is unlikely there will be one in the future. This is partly due to priorities of Czech domestic

³⁵ *Foreign Minister Szijjártó: Hungary Submits Project Proposals for Three Seas Investment Fund*, Hungary Today, February 12, 2021, <https://hungarytoday.hu/hungary-submits-project-proposals-for-three-seas-investment-fund/> (accessed December 31, 2021), V. Dostál, T. Strážay, Z. Végh, *The perspective of*, op. cit., p. 15.

³⁶ *Three Seas Initiative Investment Fund Virtual Mini-conference in May hosted by EXIM Hungary*, Exim Hungary, June 2021, <https://exim.hu/en/cikklista/146-press-releases/1360-three-seas-initiative-investment-fund-virtual-mini-conference-in-may-hosted-by-exim-hungary> (accessed December 31, 2021).

politics. Nevertheless, the Czechs were the first, apart from the founders, to appoint their representative to the Fund's Supervisory Council, which is right of all states of the region regardless of their commitment to the Fund. Moreover, since April 2021, that representative has been NRB's president, a sign of Czechia's growing interest in the Fund's activities. However, he resigned in May 2023 and has not been replaced yet. This interest is combined with a visible positive change in Prague's attitude towards the Three Seas Initiative in general. Previously, this model of regional cooperation was perceived as anti-EU and anti-German, which did not match Czech foreign priorities.³⁷ Despite not committing to the Fund, one of the Fund's investments is located in Czechia – Enezy.

Slovakia – its commitment to the Fund remains unlikely. Bratislava does not believe that the Fund can help implement Slovakia its priority projects, and the Fund's professionalism and independence are undermined in the Slovak eyes by the constant lack of private investors and the lack of financing by EIB and EBRD.³⁸ Despite not committing to the Fund, one of the Fund's investments is located in Slovakia – Enezy.

Austria – has remained outside the Fund from the beginning and did not contribute to its establishment. It also did not exercise its right to appoint a representative to its Supervisory Council. A change in attitude towards the project is not expected in the foreseeable future because the Fund is not a significant financial vehicle from the Austrian perspective.³⁹

³⁷ V. Dostál, T. Strážay, Z. Végh, *The perspective of*, op. cit., p. 8.

³⁸ Ibidem, p. 12.

³⁹ Such a view was expressed by the Ambassador of Austria to Poland Andreas Stadler during the panel of Energy Security in the Three Seas region at the Three Seas One Opportunity conference, May 19, 2022, <https://www.3s1o.org/konferencja/edycja-2022/program-2022>.

3. Structure and organizational principles

The Three Seas Initiative Investment Fund is a public limited liability company (société anonyme). It is an investment company with variable capital and a reserved alternative investment fund, meaning only qualified investors can invest in it. Some of the Fund's documentation, like its articles of association, annual reports, audited financial statements, and membership in its Supervisory Council and Management Board, are publicly known.¹ However, the Fund's Memorandum is not, which means we do not know additional requirements for members of the Fund's governing bodies, definitions of eligible investors, regulations regarding the Investment Committee, as well as the Fund's objectives, guidelines and investment strategies.

The Fund's basic organizational principles and structure are described in its Articles of Association. They have been amended since its establishment, and their latest version is from June 30, 2020. The numbers indicated below in parentheses refer to the article numbers from the latest version.

The fund has been created for a limited duration of 15 years (4.1). This period is counted from the moment of initial subscription (admitting first investors to the Fund), which happened on February 27, 2020.² This means that the Fund would be automatically put into liquidation in January 2035. However, this period may be shortened at any time

¹ Registre de Commerce et des Sociétés Luxembourg, <https://www.lbr.lu/> (accessed December 31, 2021).

² *Annual report and audited financial statements for the financial year ended 31 December 2022*, op. cit., p. 15.

under the conditions specified in the Articles of Association (4.2.), as well as extended twice by 2.5 years by the General Meeting at the request of the Fund's Management Board (4.3.)

A. General Meeting

The General Meeting represents the interests of all shareholders of the Fund. It has the broadest powers comparing with other Fund's bodies. A meeting of the General Meeting must be held at least once a year at the place of registration of the Fund (Luxembourg city). In exceptional circumstances, the Fund's Management Board may hold a meeting elsewhere (34.1, 34.2).

Meetings of the General Meeting may be convened by the Management Board, the Supervisory Council, or – in exceptional cases – two members of the Management Board acting jointly. There is also an obligation to convene such a meeting if shareholders representing one-tenth of the capital require it in writing, with an indication of the agenda (35.2). During voting, each share is entitled to one vote (35.4). Decisions are passed by a simple majority of votes cast by shareholders present or represented, with the exception of changes that would alter the Articles or the nationality of the Fund, which must be adopted unanimously (35.5).

The shares of the Fund have been issued at a price equal to one euro. (8.10). The majority of the votes at the General Meeting (80.8 percent) is currently held by BGK, which committed EUR 750 million out of a total of EUR 928 million (EUR 913 million from the Three Seas states, EUR 15 million from private investors). 2.47 percent of votes at the General Meeting belong to the Slovenian SID Banka, 2.16 percent to other regional investors (each), while the private investors have 1.61 percent (jointly).³

³ *Sprawozdanie Zarządu z działalności Grupy Kapitałowej Banku Gospodarstwa Krajowego w 2022 roku*, Bank Gospodarstwa Krajowego, https://www.bgk.pl/files/public/Pliki/Sprawozdanie_finansowe/2022-skonsolidowane/SSD_BGK_2022-12-31_PL.pdf, p. 109 (accessed November 9, 2023).

There are three categories of shares (and consequently shareholders) (6.4):

- Class A shares – exclusively reserved for the Core Sponsors (Three Seas states). Only shareholders holding shares in this class may submit candidates for members of the Fund’s Management Board,
- Class B shares – reserved for the investors, which are international financial institutions,
- Class C shares – reserved for other eligible investors.

Detailed features of the shares of each category are described in the Memorandum. The Articles of Association allow the creation of other categories of shares as necessary (6.6).

Investors don’t have to pay their commitment upfront upon subscribing for the shares. They are, however, required to enter into a Subscription Agreement committing to make all subscriptions and payments for the entire commitment. (8.3).

Key powers of the General Meeting:

- electing and removing members of the Management Board, determining the number of Board members and the term of their office (17.2, 17.4., 17.5),
- electing and removing members of the Supervisory Council (26.1, 26.4, 26.5),
- shortening or extending the term of the Fund (4.2, 4.3).

B. Management Board

The Management Board is responsible for the day-to-day operation of the Fund. It is composed of at least two Board members, one of whom acts as the chairperson. The members are elected for a term not exceeding six years and are eligible for re-appointment (17.1). According to the Fund’s financial statements, Board members receive remuneration for their work.

Members of the Management Board are appointed by the General Meeting out of a list of candidates proposed by each of the Core Sponsors (Class A shareholders) (17.2). The analysis of the list of Management

Board members shows that candidates for this function tend to be selected from among the employees of the Core Sponsor proposing them.

Each Core Sponsor, whose commitment to the Fund is at least EUR 20 million is entitled to one representative on the Board, and each one that has committed at least EUR 300 million is entitled to two. The Founding shareholders are also entitled to two representatives on the Management Board. A Core Sponsor whose commitment does not exceed the minimum indicated may delegate observer to the Board without voting right (17.2).

The Articles of Association additionally allow for the appointment of a Secretary of the Management Board who need not be a Board member and who is responsible for keeping the minutes of the meetings of the Board (18.1).

The chairperson of the Board is appointed by the Management Board from among the members who represent the Core Sponsor with the highest aggregate commitment (18.2). Since August 2020 this post has been held by Piotr Karnkowski from BGK.

The Management Board meets as needed by the Fund, but to make decisions it requires the presence or representation of at least the majority of its members, and the majority of those participating should be present in person (except for exceptional or unforeseen circumstances). Decisions of the Management Board are made by a simple majority of the members present or represented (18.8), and any ties are decided by the chairperson of the Board (18.9).

The Management Board is required to consult the Supervisory Council at least twice a year regarding the Fund's investment portfolio, contemplated investments and divestments, and actual or potential conflicts of interest (29.4). Every quarter, the Management Board reports to the Supervisory Council on the progress and foreseeable development of the Fund's business activities (29.6).

Key powers of the Management Board:

- representing the Fund to third parties (joint signatures of any two Board members are required. (23.1),
- establishing committees and delegating to them full authority to act on behalf of the Fund or to act in an advisory capacity to the Fund. In particular, the Board should establish the investment committee

with such composition, functions, duties, and features as set out in the Memorandum (22.1),

- appointing an Alternative Investment Fund Manager, responsible for the performance of the portfolio and risk management functions of the Fund (24.1),
- determining the investment objectives, policies, restrictions and guidelines of the Fund, as well as hedging strategy and cash management strategy, all within the investment powers, and restrictions set in the Memorandum, Supervisory Council or committees' recommendations, and in compliance with applicable laws and regulations (25),
- restricting or preventing the ownership of shares by any investor (11).

Current Management Board members:⁴

- **Piotr Karnkowski** – the chairperson, has represented Poland since August 18, 2020, Head of Treasury and CDM at BGK,
- **Justinas Bučys** – has represented Lithuania since March 10, 2021, Head of the strategy and business development department at VIPA (INVEGA),
- **Sebastian Cretu** – has represented Romania since April 28, 2022, Executive Director, Head of Capital Markets, Treasury and Financial Institutions at Exim Banca Romaneasca,
- **Ákos Dölle** – has represented Hungary since March 10, 2021, Treasurer at Magyar Export-Import Bank,
- **Sophia Petrova Kassidova** – has represented Bulgaria since September 29, 2022, Head of Strategy & Green Policies at BDB.
- **Ilze Lore** – has represented Latvia since June 30, 2021, Director of the Business Support Department at the Ministry of Economy of Latvia,
- **Mitja Mavko** – has represented Slovenia since April 28, 2022, Secretary-General at SID banka,
- **Krzysztof Senger** – has represented Poland since April 13, 2021, Director for Coordination of Strategic Projects Finance at BGK,
- **Corina Vulpes** – has represented Romania since May 29, 2019, Director of Institutional Relations at Exim Banca Romaneasca,

⁴ All data about existing and former Management Board and Supervisory Council members comes from the Fund's annual financial statements of the Fund and other documents submitted to the registry. In case of discrepancies, the dates provided in the financial statements were preferred.

- **Nikola Žunić** – has represented Croatia since February 27, 2023, Investment Officer at HBOR. Estonia so far has not sent its representative to the Board.

Former Management Board members:

- **Dorin Badea** – represented Romania from May 29, 2019, till February 21, 2022, at that time Executive Director – Head of Capital Markets, Treasury and Financial Institutions at Exim Banca Romaneasca,
- **Bartłomiej Bronisz** – represented Poland from May 29, 2019, till April 13, 2021, at that time an Investment Manager at BGK,
- **Aleksander Ferenc** – represented Poland from May 29, 2019, till March 20, 2020, at that time a Head of the Investment Department at BGK,
- **Panaiot Filipov** – represented Bulgaria from March 10, 2021, till June 24, 2021, at that time a member of the Management Board at BDB,
- **Goran Katušin** – represented Slovenia from April 13, 2021, till March 31, 2022, at that time member of the Management Board at SID banka,
- **Andrzej Kopyrski** – represented Poland from April 29, 2020, till July 16, 2020, as Chairperson, at that time a Managing Director at Polish Development Fund (PFR).
- **Iliya Lingorski** – represented Bulgaria from September 22, 2021, till June 1, 2022, at that time Chief Economist at BDB,
- **Anela Memišević Štetić** – represented Croatia from March 10, 2021, till February 27, 2022, at that time an advisor to the Management Board at HBOR.

C. Supervisory Council

The Supervisory Council oversees the work of the Management Board. It consists of at least three members who need not be shareholders. (26.1) This allows for the appointment of the representatives of the Three Seas states that did not invest in the Fund like Czechia.⁵

⁵ P. Nierada, *The Second Three Seas Stock...*, op. cit.

The members of the Supervisory Council are elected for a term not exceeding six years (originally it was three years) and are eligible for re-appointment. (26.1).

There are four categories of Supervisory Council members:

- **Class A** – represents Class A shareholders (Core Sponsors). Each of the Class A shareholders is entitled to one Class A Council member. Each of the Class A Shareholders, the commitment of which is at least EUR 300 million, and each of the Founding shareholders is entitled to two Class A Council members. Class A Supervisory Council members are chosen by the General Meeting out of a list of candidates submitted by each Class A shareholder,
- **Class B** – represents Class B shareholders (international financial institutions). They are appointed by the General Meeting out of a list of candidates proposed by each Class B shareholder.
- **Class C** – represents remaining qualified investors (Class C shareholders). They are appointed by the General Meeting out of a list of candidates proposed by each Class C shareholder.
- **Independent** – they are appointed by the General Meeting out of a list of candidates proposed by the Supervisory Council. (26.1)

The Articles of Association do not specify how many Class B, Class C, and Independent members may be appointed to the Supervisory Council.

The Supervisory Council members must meet a number of eligibility requirements that are set out in the Memorandum (26.6).

The analysis of the list of Supervisory Council members shows that the candidates for this function come mainly from the Management Boards of their respective Core Sponsor. Currently, on the Fund's Supervisory Council sit eight members, of which three are Presidents of the Management Board, and two are Management Board members in their respective Core Sponsors institutions.

The Supervisory Council appoints a chairperson among its members for a (renewable) period of a maximum of two years. The seat of the chairperson of the Supervisory Council rotates every two years. The chairperson is appointed by the Supervisory Council out of a list of candidates proposed collectively by the Supervisory Council members (Class A, B, and C). The successful appointment requires the support of at least

two-thirds of the Class A, B, and C Supervisory Council members (27.1). Beata Daszyńska-Muzyczka, President of BGK's Management Board, has been the chairperson since at least 2020. It is not clear why the seat has not rotated since then.

The Supervisory Council meets at least once a year (27.2). Decisions of the Supervisory Council are made by a simple majority of votes with at least the majority of its members present or represented (27.7). Any ties are decided by its chairperson (27.6). The Supervisory Council may invite Management Board members or other persons to attend its meetings as observers without voting rights. (27.4)

Key powers of the Supervisory Council:

- supervising the work of the Fund's Management Board (29.1), including inspection of all books, correspondence, minutes, and records of the Fund, and other information it deems useful or necessary (29.5),
- approving changes to the governance structure of the Fund (29.2.1),
- approving changes to the Investment Objective, the Investment Strategy, and the Investment Guidelines (29.2.2),
- setting the strategic orientation of the Fund and providing strategic advice to the Management Board on the overall development of the Fund's activities. (29.3),
- advising the Management Board at least twice a year on the status of the portfolio of investments, contemplated investments and divestments, and any actual or potential conflicts of interest (29.4).

Current Supervisory Council members:

- **Beata Daszyńska-Muzyczka** – the chairperson, has represented Poland since May 29, 2019 (reelected May 30, 2022), the President of the Management Board at BGK,
- **Nicolae Albu** – has represented Romania since May 29, 2019 (reelected May 30, 2022), an advisor to the President of the Management Board at Exim Banca Romaneasca,
- **Tsanko Arabadzhiev** – has represented Bulgaria since September 22, 2021, member of the Management Board at BDB,
- **Doru Bulata** – has represented Romania since May 29, 2019 (reelected May 30, 2022), Advisor to the President of the Management Board at Exim Banca Romaneasca,

- **Hrvoje Cuvalo** – has represented Croatia since January 13, 2023, President of the Management Board at HBOR,
- **Eszter Gyarmati** – has represented Hungary since March 10, 2021, no information on affiliation available,
- **Borut Jamnik** – has represented Slovenia since June 30, 2023, President of the Management Board at SID Banka,
- **Paweł Nierada** – has represented Poland since May 29, 2019 (re-elected May 30, 2022), 1st Vice-President of the Management Board at BGK.

At the time of writing, there were no representatives of Czechia, Estonia, Latvia, and Lithuania on the Supervisory Council.

Former Supervisory Council members:

- **Reinis Bērziņš** – represented Latvia from September 24, 2019, till June 7, 2023, at that time President of the Management Board at ALTUM,
- **Přemysl Bosák** – represented Czechia from May 29, 2019, till March 1, 2021, it is not clear what function he held at the ČMZRB (today NRB),
- **Gvidas Dargužas** – represented Lithuania from March 10, 2021, till May 24, 2023, at that time President of the Management Board at VIPA,
- **Nikolay Dimitrov** – represented Bulgaria from March 10, 2021, to June 24, 2021, at that time a member of the Management Board at BDB,
- **Damijan Dolimar** – represented Slovenia from April 28, 2022, till April 16, 2023, at that time President of the Management Board at SID Banka,
- **Jirí Jirásek** – represented Czechia from April 13, 2021, till May 31, 2023, at that time President of the Management Board at NRB,
- **Tamara Perko** – represented Croatia from March 10, 2021, till October 17, 2022, at that time President of the Management Board at HBOR,
- **Tiit Riisalo** – represented Estonia from March 16, 2020, till March 16, 2023, at that time Head of the Estonian President's Office,
- **Sibil Svilan** – represented Slovenia from December 23, 2020, till January 1, 2022, at that time President of the Management Board at SID Banka.

D. External services

The Fund's legal advisor is **CMS Luxembourg**, a Luxembourg subsidiary of an international firm specializing in legal and tax advice. CMS Luxembourg advised on all aspects of the Fund's structuring and launch in 2020. It continues to act as the Fund's legal counsel, notably on the onboarding of new investors.⁶

The Fund's auditor is the Luxembourg branch of **Ernst & Young**, an international consulting and auditing firm. The auditor's primary role is to audit the Fund's annual financial statements.⁷

The domiciliary agent of the Fund is **Credit Suisse Fund Services (Luxembourg)**, and the depositary is **Credit Suisse (Luxembourg)**; both are subsidiaries of an international banking and financial services company. The role of the depositary is to hold the assets (funds) of the Fund, as well as to supervise the proper execution of transactions. The Fund's registered office shares an address with Credit Suisse's headquarters – 5 Rue Jean Monnet, 2180 Luxembourg.⁸ Due to the merger of Credit Suisse and UBS, which is expected to be consummated by the end of 2023, Credit Suisse will be replaced by UBS.⁹

The Alternative Investment Fund Manager is **ONE Fund Management S.A.** It is responsible for portfolio performance, risk management, and other areas included in the agreement concluded with the Fund.¹⁰ Previously, the AIMF role was fulfilled by Fuchs Assets Management S.A., but the company was removed on January 16, 2023, potentially due to a 2022 investigation, which uncovered that the company did not comply with laws for internal controls and EU requirements under the Mifid rules.¹¹

⁶ CMS advises *The Three Seas Initiative Investment Fund* on the onboarding of new investors, CMS, December 16, 2020, <https://cms.law/en/lux/news-information/cms-advises-the-three-seas-initiative-investment-fund-on-the-onboarding-of-new-investors> (accessed December 31, 2021).

⁷ P. Nierada, *The Second Three Seas Stock...*, op. cit., *Restated Articles of Association...*, op. cit.

⁸ *Restated Articles of Association...*, op. cit.

⁹ *Annual report and audited financial statements For the financial year ended 31 December 2022*, op. cit., p. 7.

¹⁰ *Restated Articles of Association...*, op. cit.

¹¹ *Fuchs fined €1.02 mln as CSSF finds lack of internal controls*, Investment Officer, September 02, 2022, <https://www.investmentofficer.lu/en/news/>

The Fund's exclusive Investment Advisor is **Amber Fund Management Limited**, a UK-based company specializing in managing infrastructure investments, particularly those in the energy, transportation, and digital sectors. Amber's role goes significantly beyond investment advising. It is responsible for finding potential projects, evaluating them, making investments, and managing them throughout the duration of the Fund. To accomplish this task, Amber has set up offices throughout the Three Seas region (Warsaw, Prague, and Vilnius).¹²

Amber is also involved in promoting the Fund and attracting investors. At business events, it is represented primarily by its CEO, Gavin Tait, or the head of the Fund's investment team (Joseph Philipsz until November 2023, currently Christian Roy).¹³ Amber is also one of the two private investors in the Fund.

Together with Amber, ONE Fund Management ensures the independence of the Fund's investment process from political and other undue external influence coming from the Core Sponsors, which is of key importance when attracting private investors.¹⁴ This is described in detail in chapter four.

fuchs-fined-eu102-mln-cssf-finds-lack-internal-controls (accessed November 22, 2023).

¹² J. Philipsz, *Equity For Infrastructure, Mini-Conference*, May 18, 2021, <https://www.facebook.com/events/1115294112291966/> (accessed December 31, 2021).

¹³ J. Philipsz, *Equity For Infrastructure*, op. cit., Gavin Tait, *Three Seas Virtual Summit*, op. cit.

¹⁴ P. Nierada, *The Second Three Seas Stock...*, op. cit.

4. Fund operations

The Three Seas Fund became fully operational on February 26, 2020, that is once the Investment Advisor was selected. On this day the investment period started, which lasts five years with the possibility of two one-year extensions.¹ During the investment period, the Fund makes investments and attracts investors.

The Fund invests EUR 50-250 million in a project; lower amounts are allowed in smaller economies. The evidence of this can be found on the HBOR pages describing the Fund, where it is stated that the Fund's minimum investment is EUR 30 million.² According to Joe Philipsz, former Head of the Fund's Investment Team, larger investments will also be possible as the Fund's budget increases.³

Currently, there are eleven investors in the Fund, with total commitments of EUR 928 million. The Fund's target budget was expected to be EUR 3-5 billion, but based on fundraising progress to date, this target seems unreachable. The investors in the Fund may be institutions representing the Three Seas states, international financial institutions, and other qualified investors specified in the Memorandum.⁴

The fund is managed on a fully commercial basis and its investment process is independent of the shareholders. The target IRR (internal

¹ *Sprawozdanie Zarządu z działalności grupy kapitałowej Banku Gospodarstwa Krajowego w 2020 r.*, op. cit., p. 9.

² *The Three Seas Initiative Investment Fund*, HBOR, <https://www.hbor.hr/en/three-seas-initiative-investment-fund/> (accessed December 31, 2021).

³ J. Philipsz, *Equity For Infrastructure*, op. cit.

⁴ *Restated Articles of Association of the Three Seas Initiative Investment Fund*, op. cit.

rate of return) of the Fund is estimated at 12-15 percent, and it is the responsibility of the Fund Manager to deliver on this promise.⁵

The Fund's main investor appeal is based on its link to the Three Seas region's economic potential. The region combines high economic growth, typical of emerging markets, and economic stability, characteristic of developed markets, resulting in high, yet safe, returns on investment. There is a hope that high investment returns generated by the Fund, will encourage private investors to invest further in the region, and convince states of the region to establish more infrastructure funds. This would reduce the future cost of raising capital for infrastructure investment.⁶

The Fund is said to already have a significant complementary impact. First, it can complement other available funds – EU or national. Secondly, the investment by the Fund could help attract other equity investors and debt financing, thus leveraging more capital into an investment project.⁷ According to the Fund representatives, this means that the target EUR 3-5 billion, would translate into investments many times larger, even up to EUR 100 billion.⁸

The Fund is reaching out to potential investors and companies with projects worthy of investment both directly and through dedicated events, so-called mini conferences. A total of nine of them have been organized in the region: in Bucharest (stationary, November 2019), Warsaw (stationary, January 2020)⁹, Riga (stationary, February 2020)¹⁰, Ljubljana (online, November 2020)¹¹, Tallinn (hybrid, April 2021)¹², Sofia

⁵ J. Philipsz, *Equity For Infrastructure*, op. cit., P. Nierada, *The Second Three Seas Stock...*, op. cit.

⁶ J. Philipsz, *Equity For Infrastructure*, op. cit., G. Tait, *Three Seas Virtual Summit*, op. cit.

⁷ P. Nierada, *The Second Three Seas Stock...*, op. cit.

⁸ *Potrzeba 600 mld EUR na infrastrukturę w regionie Trójkormorza*, BGK, May 19, 2021, <https://media.bgk.pl/140735-potrzeba-600-mld-eur-na-infrastruktura-w-regionie-trojkmorza> (accessed December 31, 2021).

⁹ *Sprawozdanie Zarządu z działalności grupy kapitałowej Banku Gospodarstwa Krajowego w 2019 r.*, op. cit., p. 36.

¹⁰ *Ibidem*.

¹¹ *Ibidem*.

¹² *The operating principles of the 3SIIF will be introduced today*, 3seas.eu, April 29, 2021, <https://3seas.eu/media/news/the-operating-principles-of-the-3siif-will-be-introduced-today> (accessed December 31, 2021).

(hybrid, May 2021)¹³, Budapest (online, May 2021)¹⁴, Zagreb (hybrid, June 2021)¹⁵ and Vilnius (hybrid, November 2021).¹⁶

Additionally, representatives of BGK and Amber regularly take part in events promoting investments in the Three Seas region co-organized by Polish embassies and local partners. This included locations like Tokyo (June 2021)¹⁷, Copenhagen (September 2021)¹⁸, London (May 2022)¹⁹ and Dublin (May 2023)²⁰.

The Fund and the investment potential of the Three Seas region are also promoted at national and international events such as the Economic Forum in Karpacz, the European Financial Congress, the Bled Strategic Forum, and the World Economic Forum in Davos²¹.

¹³ BDB hosted a conference on the financing opportunities by the Three Seas Initiative Investment Fund, BDB, May 19, 2021, <https://bbr.bg/en/news-bbr/bdb-hosted-conference-financing-opportunities-three-seas-initiative-investment-fund/> (accessed December 31, 2021).

¹⁴ *Three Seas Initiative Investment Fund Virtual Mini-conference in May hosted by EXIM Hungary*, op. cit.

¹⁵ *Mini-konferencija Investicijskog Fonda Inicijative Triju Mora (3SIIF)*, HBOR, June 10, 2021, <https://www.hbor.hr/mini-konferencija-investicijskog-fonda-inicijative-triju-mora-3siif-18-6-2021/> (accessed December 31, 2021).

¹⁶ *Kviečiame į Trijų jūrų iniciatyvos investicinio fondo konferenciją*, Lietuvos Respublikos finansų ministerija, November 09, 2021, <https://finmin.lrv.lt/lt/naujienos/kvieciame-i-triju-juru-iniciatyvos-investicinio-fondo-konferencija> (accessed December 31, 2021).

¹⁷ @BGK_pl, Twitter, June 29, 2021, https://twitter.com/BGK_pl/status/1409762018505154563 (accessed December 31, 2021).

¹⁸ *Event: The Three Seas Initiative – connecting Europe, connecting regions*, Ambasada Polski w Danii, September 14, 2021, <https://www.gov.pl/web/denmark/event-the-three-seas-initiative-connecting-europe-connecting-regions> (accessed December 31, 2021).

¹⁹ *In London about the Three Seas Fund*, Three Seas Initiative Investment Fund, May 10, 2022, <https://3siif.eu/news/in-london-about-the-three-seas-fund> (accessed November 22, 2023).

²⁰ Bank Gospodarstwa Krajowego, LinkedIn, https://www.linkedin.com/posts/bank-gospodarstwa-krajowego_bgk-3siif-bgk-activity-7066099197896212480-GYV/ (accessed November 22, 2023).

²¹ *Three Seas House in Davos*, Three Seas Initiative Investment Fund, May 25, 2022, <https://3siif.eu/news/three-seas-house-in-davos> (accessed November 22, 2023).

A. Investors

The Fund's fundraising is the responsibility of Amber, the Fund's Investment Advisor.²² The Fund currently has nine state investors representing the Three Seas states (Core Investors), who have committed EUR 913 million. The first private investor of the Fund, Fond NEK of Croatia, invested EUR 10 million in June 2021.²³

At the Three Seas Initiative Summit in Tallinn in 2020, Amber CEO Gavin Tait declared that Amber would also become one of the Fund's investors with a commitment of up to EUR 10 million²⁴. The company eventually invested EUR 5 million at the end of 2021.²⁵

It is not known how many potential private investors have been contacted so far. The latest publicly known estimation is from June 2021 which set the number of investors approached at 200.²⁶ According to Pawel Nierada from BGK, talks with private investors were to gain momentum since the beginning of 2022.²⁷ However, no private investors committed to the Fund in 2022 (data for 2023 is not yet available).

According to the interviews with the BGK President and its First Vice-President, the Fund seeks investors (private and institutional) primarily from the United States, Japan, Germany, Australia, and South Korea.²⁸ The Fund's website used to have disclaimers tailored to investors from Israel, Qatar, South Korea, Kuwait, Oman, the United States, the

²² G. Tait, *Three Seas Virtual Summit*, op. cit.

²³ P. Nierada, *The Second Three Seas Stock...*, op. cit., J. Philipsz, *Trijų jūrų iniciatyvos investicinio fondo konferenciją*, Facebook, starts at 01:03:00, <https://www.facebook.com/events/672185143767961/> (accessed December 31, 2021).

²⁴ G. Tait, *Three Seas Virtual Summit*, op. cit.

²⁵ *Sprawozdanie Zarządu z działalności Grupy Kapitałowej Banku Gospodarstwa Krajowego w 2021 roku*, Bank Gospodarstwa Krajowego, April 14, 2022, https://www.bgk.pl/files/public/Pliki/Sprawozdanie_finansowe/2021-skonsolidowane/SSD_BGK_2021-12-31_PL.pdf, p. 7 (accessed November 22, 2023).

²⁶ *Annual report and audited financial statements For the financial year ended 31 December 2020*, Three Seas Initiative Investment Fund S.A. SICAV-RAIF, 07.06 2021, p. 5.

²⁷ P. Nierada, *The Second Three Seas Stock...*, op. cit.

²⁸ M. Perowicz, *Inicjatywa Trójmorza pomoże przelamać zapóźnienia rozwojowe względem Zachodu*, Klub Jagielloński, February 23, 2021, <https://klubjagiellonski.pl/2021/02/23/inicjatywa-trojmorza-pomoze-przelamac-zapoznienia-rozwojowe-wzgle-dem-zachodu/> (accessed December 31, 2021).

United Kingdom, the United Arab Emirates, and the European Union, so at least at some point in time investors from those markets were the most sought by the Fund.

However, currently, the site is only accessible to investors from the Three Seas states and the UK (those are the only choices on the dropdown of eligible states).²⁹ Investors from other states are currently informed about the lack of access to the site from their location. This might mean that the Fund is no longer actively searching for investors and the website remains open only to existing ones.

There is no update on the investment from international financial institutions such as the World Bank, the European Investment Bank, or the European Bank for Reconstruction and Development, with which the Fund have been in talks since 2019.³⁰ Lack of their investment can be due either to their investment restrictions (e.g. ban on investment in non-renewable energy generation) or their reservations towards the Fund (e.g. investment goals or estimated ROI). Without a doubt, investment from international financial institutions would increase the Fund's credibility, which could generate more interest among private investors, bring the remaining Three Seas states on board, or increase existing commitments.

However, a certain success of the Fund is being mentioned in the International Monetary Fund's report *Infrastructure in Central, Eastern, and Southeastern Europe Benchmarking, Macroeconomic Impact, and Policy Issues*.³¹

The United States remains the priority investor for the Fund. In January 2020, a series of meetings on the possibilities of cooperation between the Three Seas Initiative region and American partners took place in Washington. Representatives of five states (Poland, Romania, Estonia, Latvia, and Czechia) met with representatives of government administration and international financial institutions.³²

²⁹ Three Seas Initiative Investment Fund, <https://3siif.eu/> (accessed December 31, 2023).

³⁰ *Sprawozdanie Zarządu z działalności grupy kapitałowej Banku Gospodarstwa Krajowego w 2020 r.*, op. cit., p. 8.

³¹ A. Ari et al, *Infrastructure in Central, Eastern, and Southeastern Europe*, op. cit.

³² *Sprawozdanie Zarządu z działalności grupy kapitałowej Banku Gospodarstwa Krajowego w 2020 r.*, op. cit., p. 41.

In February of that year, the United States declared its readiness to invest up to USD 1 billion in the Three Seas infrastructure. In October, at the Three Seas Initiative Summit in Tallinn, Undersecretary Keith Krath emphasized that the final amount of American support depends on the commitments to the Fund from the Three Seas states and will amount to 30 percent of the total sum.³³

The institution, which would deliver American financing to the Fund is the International Development Finance Corporation (IDFC). In December 2020 IDFC announced on its Twitter account that its funding for the Fund would amount to USD 300 million, which corresponded to approximately 30 per cent of the total commitments at the time.³⁴

However, the investment by IDFC was not finalized in 2021 due to a change of presidential administration in January 2021. In June 2023, it was announced during the 3SI Riga summit that IDFC and 3SIIF agreed to a term sheet for up to USD 300 million in financing.³⁵ It has been almost one and a half year since this announcement, and there have been no updates on the American funding. This suggests that the matter has not been finalized.

The American investment in the Fund enjoys bipartisan support in Congress, as evidenced by the resolution of November 2020 (H.RES. 672)³⁶ or the Ensuring American Global Leadership and Engagement Act (EAGLE Act) of May 2021.³⁷ Undoubtedly, however, this project has lost priority for President Biden's administration.

³³ *Undersecretary Keith Krath: U.S. will invest up to \$1 billion in 3SI*, 3seas.eu, October 19, 2021, <https://3seas.eu/media/news/undersecretary-keith-krath-u-s-will-invest-up-to-eur1-billion-in-3si> (accessed December 31, 2021).

³⁴ @DFCgov, Twitter, December 10, 2020, <https://twitter.com/DFCgov/status/1337167491311788032> (accessed December 31, 2021).

³⁵ *U.S. International Development Finance Corporation and the Three Seas Initiative Investment Fund agree to term sheet for up to US\$300 million in financing*, Three Seas Initiative Investment Fund, June 20, 2022, <https://3siif.eu/news/u-s-international-development-finance-corporation-and-the-three-seas-initiative-investment-fund-agree-to-term-sheet-for-up-to-us300-million-in-financing> (accessed November 22, 2023).

³⁶ *H.Res.672*, Congress.gov, October 31, 2019, <https://www.congress.gov/bill/116th-congress/house-resolution/672?r=6&s=1> (accessed December 31, 2021).

³⁷ *H.R.3524 - EAGLE Act*, Congress.gov, May 25, 2021, <https://www.congress.gov/bill/117th-congress/house-bill/3524/text> (accessed December 31, 2021).

It is worth noting that from the American point of view, an investment in the Fund could bring a range of benefits:

- **geopolitical benefits** – investments of the Fund, and in the Initiative itself, could provide a counterbalance to Chinese investments (Belt and Road) and convince Three Seas states to leave the 14+1 format, strengthening American presence in the region,³⁸
- **security benefits** – the Fund’s investments will increase regional security, in particular, energy and digital security against Russia; nine participating states of the Three Seas Initiative form NATO’s eastern flank, which grew in importance since the Russian attack on Ukraine,³⁹
- **economic benefits** – some of the American financing will benefit American companies operating in the region, through their services or product and technology delivery. American companies are well aware of this, as evidenced by the American Chamber of Commerce’s active participation in the Three Seas Initiative Summits and Business Forums.

This wide range of benefits means that US financing might still be on the table, though the terms and amount of funding may not be as generous to reflect a change in the priorities of the current administration.

B. Investment process

To alleviate fears of potential state shareholders’ influence on the Fund’s investment process, there is a significant effort to present said investment process as transparent, independent of investors, and conducted in accordance with the investment strategy. No presentation or interview on the Fund, can go on without this question addressed at least once. The main responsibility for ensuring that those are not mere declarations, lies with the Alternative Investment Fund Manager (One Fund Management, earlier Fuchs) and the Investment Advisor (Amber).⁴⁰

³⁸ M.in. *H.Res.672*, op. cit.

³⁹ *Ibidem*.

⁴⁰ J. Philipsz, *Equity For Infrastructure*, op. cit., P. Nierada, *The Second Three Seas Stock...*, op. cit.

A key role in the process is played by the Investment Committee, an advisory body appointed by the Management Board. Detailed provisions regarding its organizational rules, requirements for its members, and the method of their selection are included in the Memorandum and they remain secret. However, the Fund's past business presentations showed that it consisted of five people, two of whom represented Amber, one Fuchs, while the other two remained independent. Independent in this context means a qualified individual not employed by the Fund's service providers or the Fund's shareholders.⁴¹

The information, who sits on the Investment Committee is no longer present in the Fund's presentations. However, at least till the end of 2021, the Committee consisted of:⁴²

- Gavin Tait (CEO of Amber),
- Amanda Woods (Chief Investment Officer at Amber),
- Luc Dupont (Fuchs),
- Colin Hewett (Independent),
- Gerald Koch (Independent).

Since Fuchs was replaced in January 2023 by One Fund Management, it is reasonable to believe that Luc Dupont was replaced as well by a representative of the new Alternative Investment Fund Manager. He might have been invited to stay as an independent member, though.

The investment process takes 9 to 15 months and begins by identifying a potential project directly by Amber or entities cooperating with it, such as Core Sponsors. An entity seeking an investment from the Fund may also submit a project to Amber.⁴³

An investment can be rejected at any stage of the investment process. Statistics presented at the Fund's mini conferences show that majority of the projects are rejected and the first stage (preliminary evaluation), during which the Investment Advisor assesses the high level compatibility of the investment with the Fund's objectives.⁴⁴

⁴¹ P. Nierada, *The Second Three Seas Stock...*, op. cit.

⁴² J. Philipsz, *Equity For Infrastructure*, op. cit.

⁴³ J. Philipsz, *Trijų jūrų iniciatyvos investicinio fondo...*, op. cit.

⁴⁴ J. Philipsz, *Equity For Infrastructure*, op. cit., P. Nierada, *The Second Three Seas Stock...*, op. cit.

The second stage is project analysis. At this stage, the Investment Advisor reviews the business case and its feasibility and sets out the conditions for proceeding to the next stage. The stage ends with preliminary approval of the project by the Investment Committee.

The next stage is comprehensive due diligence on the project combined with financial modeling. The process involves consultants, lawyers, and financial advisors from the states where prospective investment will be located, as well as from Amber's local representatives in the region.⁴⁵ Moving to the next stage is contingent on a positive outcome of the study or the fulfillment of further conditions.

Other equity and debt investors for the investment are then brought in and detailed legal documentation of the transaction is drafted. After final approval by the Investment Committee, the documentation is signed, the transaction is closed, and the Investment Advisor begins managing the investment.

C. Investment criteria

Detailed investment criteria of the Fund are included in the Memorandum, which – as already mentioned – is not a public document. However, the key conditions can be inferred from statements made by BGK or Amber representatives in the interviews or the presentations shown at business events (e.g. mini conferences).

The Fund targets investment that:

- improve connectivity and cooperation throughout the Three Seas region,
- accelerate economic development by expanding state-of-the-art infrastructure,
- enhance energy security and deliver energy transition,
- are supply-critical, long-term assets.

⁴⁵ Joe Phillips: *Bulgarian companies are already showing interest with port projects*, BDB, May 25, 2021, <https://bbr.bg/en/news-bbr/joe-phillips-bulgarian-companies-are-already-showing-interest-port-projects/> (accessed December 31, 2021).

Project-specific criteria:⁴⁶

- **commercially viable** – projects must be able to bring a return on the investment and contribute to the Fund’s target IRR of 12-15 percent gross,
- **in one of the priority sectors** – only projects from the energy, transportation, and digital infrastructure sectors will be considered,
- **located and benefitting the Three Seas region** – projects must be located in at least one of the Three Seas states and bring broader benefits to at least two states of the region,⁴⁷
- **right development stage and growth potential** – greenfield (ready-to-build) infrastructure projects are preferred; projects with existing assets (brownfield) that have substantial growth or expansion potential can also be considered, but projects in the development phase will not,
- **business potential** – projects must have high visibility of cashflows, long-term predictable and inflation-linked revenue streams, and limited sensitivity to economic cycles,
- **strong ESG credentials** – projects must in particular demonstrate a responsible approach to environmental aspects,
- **high-quality management team and adviser ready to deliver growth.**

Portfolio-specific criteria:

- **geographically diverse** – as much as practicable the Fund should try to invest throughout the region⁴⁸, without guarantees that each Three Seas state should get at least one investment and that the amount of investment in a core sponsor state would be linked to its declared commitment to the Fund,⁴⁹
- **focus on projects that improve the North-South connectivity** – this refers in particular to energy and transport infrastructure,⁵⁰

⁴⁶ J. Philipsz, *Equity For Infrastructure*, op. cit., P. Nierada, *The Second Three Seas Stock...*, op. cit.

⁴⁷ Ibidem.

⁴⁸ J. Philipsz, *Equity For Infrastructure*, op. cit.,

⁴⁹ *Joe Phillips: Bulgarian companies...*, op. cit.

⁵⁰ J. Philipsz, *Equity For Infrastructure*, op. cit., J. Philipsz, *Trijų jūrų iniciatyvos investicinio fondo...*, op. cit.

- **evenly distributed across sectors** – 33 percent of funding should go to each priority sector (before 2023 the Fund was dedicating 40 percent of funding for transportation projects, 40 percent to energy projects, and 20 percent to digital projects. The digital investment share was increased as a consequence of higher importance of this sector resulting from the pandemic⁵¹),
- **preference for *greenfield*** – new infrastructure should be prioritized over the existing infrastructure with growth or expansion potential.

D. Investment projects

The fund makes long-term investments in three sectors: energy, transportation and digital, targeting in particular:

- **transportation:** road and rail projects, rolling stock, ports, airports,
- **energy:** renewable energy, gas generation, LNG, pipeline, transmission, and distribution networks,
- **digital:** fiber networks, telecommunication towers, data centers.

The Fund's portfolio includes five investments: two per the energy and transportation sector and one in digital.⁵² At least EUR 719.1 million was committed to these projects so far, of which over EUR 600 million were already deployed.⁵³ The existing portfolio companies operate in 7 out of 12 states of the region: Estonia, Poland, Czechia, Slovakia, Bulgaria, Romania and Slovenia. Czechia and Slovakia have received their investments despite not being committed to the Fund, while Lithuania, Latvia, Hungary, and Croatia received no investments despite being investors.

According to BGK President of the Management Board and Chairperson of the Fund's Supervisory Council, Beata Daszyńska-Muzyczka, two

⁵¹ P. Nierada, *The Second Three Seas Stock...*, op. cit.

⁵² Joe Phillips: *Bulgarian companies...*, op. cit.

⁵³ *Annual report and audited financial statements For the financial year ended 31 December 2022*, op. cit., *R.Power raises €150 million investment and welcomes the Three Seas Initiative Investment Fund as a new investor*, Three Seas Initiative Investment Fund, February 10, 2023, <https://3siif.eu/news/r-power-raises-e150-million-investment-and-welcomes-the-three-seas-initiative-investment-fund-as-a-new-investor> (accessed November 22, 2023).

more projects were in the pipeline as of September 2023, which would probably be the last investments made by the Fund unless the budget increases.⁵⁴ One of those projects could be greenfield gas infrastructure in Romania, as the Fund has signed an agreement to invest in it during the 2022 Davos Summit.⁵⁵ The Fund's Investment Advisor has identified over 300 potential projects, of which over 180 have already been rejected.⁵⁶

The Fund's invests in each project EUR 50-250 million. In return, the Fund seeks a controlling or significant minority stake (provided it guarantees the influence over the investment), and the Fund's representative gets a seat on the company's management directors.⁵⁷

Cargounit⁵⁸

- **Location:** Poland, Romania,
- **Sector:** transportation,
- **Infrastructure type:** rolling stock,
- **SDGs supported:** 9 Industry, innovation, and infrastructure, 11 Sustainable cities and communities,
- **Development stage:** brownfield with expansion potential,
- **Ownership:** 100 percent.

The Fund's first investment, finalized in November 2020. The Fund acquired 100 percent of the company's shares. The capital commitment to Cargounit is EUR 136.8 million, and the invested capital is EUR 133.5 million.⁵⁹ Cargounit is the market leader in locomotive rental in the region, the sixth-largest rolling stock company in Europe, and the only

⁵⁴ B. Daszyńska Muzyczka, *3SI Business Forum, Energy Section*, 3seas.eu, <https://3seas.eu/media/news/3si-business-forum-2023-energy-section>, starts at 1:06:15 (accessed November 22, 2023).

⁵⁵ *Three Seas Initiative Investment Fund signs agreement to invest in greenfield gas infrastructure in Romania*, op. cit.

⁵⁶ B. Daszyńska Muzyczka, *3SI Business Forum, Energy Section*, op. cit., @CzechEmbassyIE, May 18, 2023, <https://twitter.com/CzechEmbassyIE/status/1659129743927656448> (accessed November 22, 2023).

⁵⁷ J. Philipsz, *Equity For Infrastructure*, op. cit.,

⁵⁸ *Cargounit - 3SIIF*, Amber Infrastructure, <https://amberinfrastructure.com/our-sectors/case-studies/cargounit-3siif/> (accessed December 31, 2021).

⁵⁹ *Annual report and audited financial statements For the financial year ended 31 December 2022*, op. cit., p. 4.

one in the Three Seas able to offer a full suite of locomotive types. Since the Fund's investment, the company expanded into Romania and plans into other Three Seas states, strengthening the north-south connectivity and lowering transportation costs in the region.

The investment in Cargounit has caused some controversy, because it competes with Rail Capital Partners and Polski Tabór Szynowy, which are owned by the Polish Development Fund (PFR) and the Industrial Development Agency (ARP), respectively, which together with BGK are part of the PFR Group.⁶⁰ However, it should be noted that BGK, as a shareholder, is said to have no say in the Fund's investment process, so deliberate action on its part is unlikely.

Greenergy Data Centers⁶¹

- **Location:** Estonia,
- **Sector:** digital infrastructure,
- **Infrastructure type:** data center,
- **SDGs supported:** 9 Industry, innovation, and infrastructure,
- **Development stage:** greenfield,
- **Ownership:** 95.1 percent.

The second investment of the Fund, finalized in December 2020. Initially, the Fund committed EUR 70.9 million, which was later increased to EUR 80.9 million. The amount invested so far is EUR 75.7 million.⁶² Greenergy is building the largest and most energy-efficient data center in the Baltic region powered entirely by renewable energy sources. The

⁶⁰ K. Kapczyńska, *Fundusz Trójmorza inwestuje w pociągi*, „Puls Biznesu”, October 23, 2020, <https://www.pb.pl/fundusz-trojmorza-inwestuje-w-pociagi-1006396> (accessed December 31, 2021).

⁶¹ B. Supernak, *Fundusz Trójmorza zainwestował w estońską spółkę Greenergy Data Centers*, *Inwestycje.pl*, December 4, 2020, <https://inwestycje.pl/biznes/fundusz-trojmorza-zainwestowal-w-estonska-spolke-greenergy-data-centers/> (accessed December 31, 2021), *Greenergy Data Centers - 3SIIF*, Amber Infrastructure, <https://amberinfrastructure.com/our-sectors/case-studies/greenergy-data-centers-3siif/> (accessed December 31, 2021), *Annual report and audited financial statements For the financial year ended 31 December 2022*, op. cit., p. 36.

⁶² *Annual report and audited financial statements For the financial year ended 31 December 2022*, op. cit., p. 4.

first phase of its construction is now completed and the company plans to develop data centers throughout the region over the coming years.

Thanks to this investment of the Fund, the Three Seas region will gain new digital infrastructure, for which the demand has significantly increased since the COVID-19 pandemic. Greater use of digital technologies, especially in services and traditional industries, is key to increasing the competitiveness of the region.

Enery⁶³

- **Location:** Bulgaria, Czechia, Estonia, Slovakia, Romania, Austria,
- **Sector:** energy,
- **Infrastructure type:** renewable energy generation,
- **SDGs supported:** 7 affordable and clean energy, 13 climate action,
- **Development stage:** mostly greenfield,
- **Ownership:** 75 percent.

The Fund's third investment finalized in June 2021. The Fund acquired a significant stake in the company. According to the financial statement, the capital committed to Enery is EUR 237 million, and the invested capital on December 31, 2022, was EUR 152.8 million.⁶⁴ Enery has solar power plants throughout the region with a pipeline of development opportunities standing at over 3GW.⁶⁵

With 3SIIF's investment, Enery plans to invest EUR 1 billion in the energy transition of a region, shifting from fossil-based power generation to a fully renewable-based and sustainable generation mix.⁶⁶ According to the Fund, the Three Seas region has ideal conditions for photovoltaics due to high levels of irradiation and availability of suitable land, which offers substantial opportunities for renewable investment in the near term.

⁶³ Enery – 3SIIF, Amber Infrastructure, <https://amberinfrastructure.com/our-sectors/case-studies/enery-3siif/> (accessed December 31, 2021), *Annual report and audited financial statements For the financial year ended 31 December 2022*, op. cit., p. 36.

⁶⁴ *Annual report and audited financial statements For the financial year ended 31 December 2022*, op. cit., p. 4.

⁶⁵ Ibidem.

⁶⁶ *The Three Seas Fund makes its first energy investment*, Three Seas Initiative Investment Fund, May 26, 2021, <https://3siif.eu/news/the-three-seas-fund-makes-its-first-energy-investment> (accessed November 22, 2023).

Burgas⁶⁷

- **Location:** Bulgaria,
- **Sector:** transportation,
- **Infrastructure type:** sea cargo port,
- **SDGs supported:** 9 Industry, innovation and infrastructure, 11 Sustainable cities and communities,
- **Development stage:** brownfield with expansion potential,
- **Ownership:** significant minority (49 percent).⁶⁸

The Fund's fourth investment was closed in July 2022. The Fund acquired a significant minority stake in the company. According to Bulgarian Development Bank Executive Director Tsanko Arabadzhiev, who sits on the Fund's Supervisory Council, the investment absorbed some EUR 150 million from the Fund's budget.⁶⁹ However, the financial statements for 2022 indicate that the Fund committed EUR 115.4 million (originally EUR 125.4 million) and invested EUR 102.7 million. Perhaps the committed amount was increased in 2023, which will be reflected in the financial statements published next year.

The Port of Burgas is a logistic hub connecting the southeast part of the Three Seas region with Central Asia and the Middle East. 3SIIF's investment will support its long-term growth and expansion of its capacity and capabilities. This, in the long term, will support existing and help create new industrial potential for Bulgaria and the broader region.⁷⁰

⁶⁷ *BMF Port Burgas – 3SIIF*, Amber Infrastructure, <https://www.amberinfrastructure.com/our-sectors/case-studies/bmf-port-burgas-3siif/> (accessed November 22, 2023).

⁶⁸ *Annual report and audited financial statements For the financial year ended 31 December 2022*, op. cit., p. 36.

⁶⁹ D. Dukovska, *Bulgaria Has Attracted Second Largest Investments under Three Seas Initiative Investment Fund*, BTA, September 14, 2023, <https://www.bta.bg/en/news/economy/522527-bulgaria-has-attracted-second-largest-investments-under-three-seas-initiative-in> (accessed November 22, 2023).

⁷⁰ *BMF Port Burgas – 3SIIF*, op. cit.

R. Power⁷¹

- **Location:** Poland, Romania,
- **Sector:** energy,
- **Infrastructure type:** renewable energy generation,
- **SDGs supported:** 7 affordable and clean energy, 13 climate action,
- **Development stage:** mix of brownfield and greenfield,
- **Ownership:** minority stake.

The Fund's fifth investment was completed in March 2023. The fund acquired a minority stake in the company for EUR 150 million.⁷² The Fund retains an option to increase investment further to EU 250 million, which is the cap for 3SIIF investments.⁷³

R.Power is a leading independent power producer active in solar PV and battery storage. The company is headquartered in Warsaw and has operations across Poland, Romania, Germany, Italy, Spain, and Portugal. The Fund's investment will support the Company's long-term growth strategy, with a plan to achieve a 1 GWp operating solar portfolio within the next two years across EU markets. At present, the Company is operating and constructing more than 500 MWp of utility-scale solar PV plants in Poland and Portugal.⁷⁴

⁷¹ R.Power raises €150 million investment and welcomes the Three Seas Initiative Investment Fund as a new investor, op. cit.

⁷² Annual report and audited financial statements for the financial year ended 31 December 2022, op. cit., p. 7.

⁷³ R.Power raises €150 million investment and welcomes the Three Seas Initiative Investment Fund as a new investor, op. cit.

⁷⁴ Ibidem.

Summary

The Three Seas Initiative Investment Fund is the most significant and, arguably, the only tangible achievement of the Three Seas Initiative, even though it is technically an independent endeavor. The Fund might be politically inspired but it remains commercially viable, meaning its objectives are based on proven infrastructural and financial needs.

Despite the significant involvement of politically controlled entities, the Fund appears to have succeeded in remaining independent with regard to the investment process. In over four years of its existence, it has also achieved several significant milestones:

1. The Fund has managed to convince nine of the twelve Three Seas states to join the Fund and commit over EUR 900 million.
2. The Fund has already made at least one investment in each priority sector. All those investments can be considered sustainable and environmentally friendly, which is important for attracting private investors and international financial institutions.
3. Almost all states of the region (except Slovakia and Austria) are represented in the Fund's governing bodies. It is noteworthy that all those representatives are high-ranking officials in their respective states, which is particularly true for the Supervisory Council.

However, the Fund has also failed to achieve many of its goals, which can result in not all of its promises being fulfilled:

1. The Fund failed to convince Czechia and Slovakia to join the Fund, and the other states of the region to increase their current commitments. This undermined the credibility of the Fund internationally and significantly limited the amount of funds that can be invested in regional projects.
2. Core sponsors failed to limit Poland's influence on the Fund. Poland

has 80 percent of the General Meeting votes and two representatives in each governing body (including both chairpersons). It is therefore, more of a Polish project than a regional one, which is detrimental to the Fund and regional cooperation.

3. The Fund failed to secure American investment. Despite two official announcements by two different American administrations, no money has been committed to the Fund in any form. It is not clear what is the reason behind the lack of IDFC money, but it nevertheless undermines the Fund's credibility in the eyes of other investors.
4. The Fund failed to secure investment from private investors or international financial institutions. There are, of course, two private investors in the Fund, but they hardly qualify as such since one is the state-owned fund and the other advisor to the Fund.
5. The Fund made only five investments in four years. Only one or two more investments are expected due to an exhausted budget. Investing in seven projects out of over 300 reviewed means that either the regional investment potential is not as substantial as claimed by the Fund, or that the Fund's criteria are too strict.

It is unlikely that any of the failures described above can still be ameliorated. There is a visible decline in promotional activities by both the Funds and its driving force – BGK, which could mean that they have given up on delivering exceptional results.

This could be further cemented by changes in the BGK management board, which are expected in early 2024 as a result of the last parliamentary elections. This change can also impact the creation of a new green-oriented successor infrastructure fund, which was encouraged in the Joint Declaration of the Eighth Summit of the Three Seas Initiative.

When evaluating the Fund's successes and failures, we should not forget that this is the first undertaking of this type created in the region for the region and that from the very beginning it has been operating in challenging economic conditions caused by the COVID-19 pandemic and Russian attack on Ukraine.

While both events increased the importance of infrastructure investment in crisis recovery, national security, and economic resilience,

they also limited the financial resources that could be dedicated to infrastructure projects – both from the states and prospective private investors.

To determine the full scale of the Fund's success, we have to wait till at least February 2035, when it will be liquidated. The Fund might still deliver high returns on investments, which would prove the region's attractiveness and help attract additional capital to the Three Seas Initiative. The only problem is – will anyone still remember and care about the Fund then?

Bibliography

- @bank-gospodarstwa-krajowego, LinkedIn, https://www.linkedin.com/posts/bank-gospodarstwa-krajowego_bgk-3siif-bgk-activity-7066099197896212480-GYVV (accessed: November 22, 2023).
- @BGK_pl, Twitter, June 29, 2021, https://twitter.com/BGK_pl/status/1409762018505154563 (accessed: December 31, 2021).
- @CzechEmbassyIE, May 18, 2023, <https://twitter.com/CzechEmbassyIE/status/1659129743927656448> (accessed: November 22, 2023).
- @DFCgov, Twitter, December 10, 2020, <https://twitter.com/DFCgov/status/1337167491311788032> (accessed: December 31, 2021).
- 3SI Business Forum, Energy Section, 3seas.eu, <https://3seas.eu/media/news/3si-business-forum-2023-energy-section> (accessed: November 22, 2023).
- Amber Appointed Exclusive Adviser to Three Seas Fund, Amber Infrastructure, March 04, 2020, <https://amberinfrastructure.com/news/press-releases/2020/amber-infrastructure-appointed-exclusive-adviser-to-three-seas-initiative-investment-fund/> (accessed: December 31, 2021).
- Annual report and audited financial statements For the financial year ended 31 December 2020*, Three Seas Initiative Investment Fund S.A. SICAV-RAIF, June 7, 2021 (accessed: December 31, 2021).
- Annual report and audited financial statements For the financial year ended 31 December 2022*, Three Seas Initiative Investment Fund S.A. SICAV-RAIF, July 7, 2023 (accessed: November 22, 2023).
- Ari A. et al, *Infrastructure in Central, Eastern, and Southeastern Europe: Benchmarking, Macroeconomic Impact, and Policy Issues*, IMF, September 28, 2020, <https://www.imf.org/en/Publications/Departmental-Papers-Policy-Papers/Issues/2020/09/25/Infrastructure-in-Central-Eastern-and-Southeastern-Europe-Benchmarking-Macroeconomic-Impact-49580> (accessed: December 31, 2021).
- Bajda P., *Inicjatywa Trójmorza 2016-2020 in statu nascendi*, Warsaw 2020.
- BDB hosted a conference on the financing opportunities by the Three Seas Initiative Investment Fund, BDB, May 19, 2021, <https://bbr.bg/en/news-bbr/>

- bdb-hosted-conference-financing-opportunities-three-seas-initiative-investment-fund/ (accessed: December 31, 2021).
- BMF Port Burgas – 3SIIF*, Amber Infrastructure, <https://www.amberinfrastructure.com/our-sectors/case-studies/bmf-port-burgas-3siif/> (accessed: November 22, 2023).
- Cargounit – 3SIIF*, Amber Infrastructure, <https://amberinfrastructure.com/our-sectors/case-studies/cargounit-3siif/> (accessed: December 31, 2021).
- Chruściel M., *The Czech „awakening” towards the Three Seas Initiative – conclusions from the study visit to Prague*, Instytut Nowej Europy, March 2, 2023, <https://ine.org.pl/en/the-czech-awakening-towards-the-three-seas-initiative-conclusions-from-the-study-visit-to-prague/> (accessed: November 22, 2023).
- CMS advises The Three Seas Initiative Investment Fund on the onboarding of new investors*, CMS, December 16, 2020, <https://cms.law/en/lux/news-information/cms-advises-the-three-seas-initiative-investment-fund-on-the-onboarding-of-new-investors> (accessed: December 31, 2021).
- Database of the Three Seas Interconnection Priority Projects*, 3seas.eu, <https://projects.3seas.eu/> (accessed: December 30, 2021).
- Dostál V., Strážay T., Végő Z., *The perspective of the Czech Republic, Hungary, and Slovakia on the Three Seas Initiative*, June 2021, https://www.amo.cz/wp-content/uploads/2021/06/AMO_The_Perspective_odfcn_the_3SI.pdf (accessed: December 31, 2021).
- Dukovska D., *Bulgaria Has Attracted Second Largest Investments under Three Seas Initiative Investment Fund*, BTA, September 14, 2023, <https://www.bta.bg/en/news/economy/522527-bulgaria-has-attracted-second-largest-investments-under-three-seas-initiative-in> (accessed: November 22, 2023).
- Energy – 3SIIF*, Amber Infrastructure, <https://amberinfrastructure.com/our-sectors/case-studies/energy-3siif/> (accessed: December 31, 2021).
- Equity For Infrastructure. Mini-Conference*, May 18, 2021, <https://www.facebook.com/events/1115294112291966/> (accessed: December 31, 2021).
- Event: The Three Seas Initiative – connecting Europe, connecting regions*, Ambasada Polski w Danii, September 14, 2021, <https://www.gov.pl/web/denmark/event-the-three-seas-initiative-connecting-europe-connecting-regions> (accessed: December 31, 2021).
- Expansion of European Team*, Amber Infrastructure, April 20, 2022, <https://www.amberinfrastructure.com/news/press-releases/2021/expansion-of-european-team-with-appointment-of-dorin-alexandru-badea-as-a-senior-investment-director/> (accessed: November 22, 2023).
- Foreign Minister Szijjártó: Hungary Submits Project Proposals for Three Seas Investment Fund*, “Hungary Today”, February 12, 2021, <https://hungarytoday.hu/hungary-submits-project-proposals-for-three-seas-investment-fund/> (accessed: December 31, 2021).

- Fuchs fined €1.02 mln as CSSF finds lack of internal controls*, Investment Officer, September 02, 2022, <https://www.investmentofficer.lu/en/news/fuchs-fined-eu102-mln-cssf-finds-lack-internal-controls> (accessed: November 22, 2023).
- Fundusz nabiera rozpędu*, „Gazeta Polska Codziennie”, July 28, 2021, <https://gpcodziennie.pl/793339-fundusz-nabiera-rozpedu.html> (accessed: December 31, 2021).
- Górny G., *Jan Sechter: w sprawie Zielonego Ładu konieczne jest powstanie koalicji zdrowego rozsądku*, Trimarium.pl, September 2021, <https://trimarium.pl/jan-sechter-w-sprawie-zielonego-ladu-konieczne-jest-powstanie-koalicji-zdrowego-rozsadku/> (accessed: December 31, 2021).
- Greenery Data Centers – 3SIIF*, Amber Infrastructure, <https://amberinfrastructure.com/our-sectors/case-studies/greenery-data-centers-3siif/> (accessed: December 31, 2021).
- Grosse T.G. (ed.), *Paliwo dla dominacji*, Warsaw 2020.
- H.R.3524 – EAGLE Act*, Congress.gov, May 05, 2021, <https://www.congress.gov/bill/117th-congress/house-bill/3524/text> (accessed: December 31, 2021).
- H.Res.672*, Congress.gov, October 31, 2019, <https://www.congress.gov/bill/116th-congress/house-resolution/672?r=6&s=1> (accessed: December 31, 2021).
- Inicjatywa Trójmorza – opis projektu i skrót debaty*, Forum Młodych Dyplomatów, June 2, 2021, <http://diplomacy.pl/pl/blog/europa-wschodnia/item/577-inicjatywa-trojmorza-opis-projektu-i-skrot-debaty> (accessed: December 31, 2021).
- Inauguracja Sieci Uniwersytetów Trójmorza*, KUL, <https://3sun.kul.pl/aktualnosci/inauguracja-sieci-universytetow-trojmorza/> (accessed: February 15, 2024).
- In London about the Three Seas Fund*, Three Seas Initiative Investment Fund, May 10, 2022, <https://3siif.eu/news/in-london-about-the-three-seas-fund> (accessed: November 22, 2023).
- Jakóbiak W., *USA sfinansują atom w Rumunii. Wnioski dla Polski*, BiznesAlert.pl, October 12, 2020, <https://biznesalert.pl/atom-rumunia-usa-polska-ppej-energetyka-atom/> (accessed: December 22, 2021).
- Jasiecki K., *Nowa peryferyjność w perspektywie różnorodności kapitalizmu. Przykład posocjalistycznych państw*, in: *Polska jako peryferie*, in: *Polska jako peryferie*, ed. by T. Zarycki, Warsaw 2016.
- Joe Phillips: Bulgarian companies are already showing interest with port projects*, BDB, May 25, 2021, <https://bbr.bg/en/news-bbr/joe-phillips-bulgarian-companies-are-already-showing-interest-port-projects/> (accessed: December 31, 2021).
- Joint Declaration of the Eighth Summit of the Three Seas Initiative (Bucharest, 6-7 September 2023)*, 3SI Research Center, <https://3si.politic.edu.pl/joint->

- declaration-of-the-eighth-summit-of-the-three-seas-initiative-bucharest-6-7-september-2023/ (accessed: February 15, 2024).
- Joint Declaration of the Sixth Summit of the Three Seas Initiative*, 3seas.eu, <https://3seas.eu/event/joint-declaration-of-the-sixth-summit-of-the-three-seas-initiative> (accessed: December 29, 2021).
- Joint Declaration of the Third Summit of the Three Seas Initiative*, 3seas.eu, <http://three-seas.eu/wp-content/uploads/2018/09/BUCHAREST-SUMMIT-JOINT-DECLARATION.pdf> (accessed: December 28, 2021).
- Kapczyńska K., *Fundusz Trójmorza inwestuje w pociągi*, „Puls Biznesu”, October 23, 2020, <https://www.pb.pl/fundusz-trojmorza-inwestuje-w-pociagi-1006396> (accessed: December 31, 2021).
- Kowal P., Orzelska-Stączek A., *Inicjatywa Trójmorza: geneza, cele i funkcjonowanie*, Warsaw 2019.
- Kuusik P., *Estonia and the Three Seas Initiative. A Change of Heart and Political Winds*, Visegrad Insight, June 15, 2020, <https://visegradinsight.eu/estonia-and-the-three-seas-initiative/> (accessed: December 31, 2021).
- Kviečiame į Trijų jūrų iniciatyvos investicinio fondo konferenciją*, Lietuvos Respublikos finansų ministerija, November 09, 2021, <https://finmin.lrv.lt/lt/naujienos/kvieciame-i-triju-juru-iniciatyvos-investicinio-fondo-konferencija> (accessed: December 31, 2021).
- Lewkowicz Ł., Gołebiowska M., *Inicjatywa Trójmorza przed szczytem w Rydze: inspirowana politycznie, napędzana komercyjnie*, <https://ies.lublin.pl/komentarze/inicjatywa-trojmorza-przed-szczytem-w-rydze-inspirowana-politycznie-napedzana-komercyjnie/> (accessed: January 7, 2022).
- Mini-konferencija Investicijskog Fonda Inicijative Triju Mora (3SIIF)*, HBOR, June 10, 2021, <https://www.hbor.hr/mini-konferencija-investicijskog-fonda-inicijative-triju-mora-3siif-18-6-2021/> (accessed: December 31, 2021).
- Nowak A.W., *Tajemnicze zniknięcie Drugiego Świata. O trudnym losie półperyferii*, in: *Polska jako peryferie*, ed. by T. Zarycki, Warsaw 2016.
- Perowicz M., *Inicjatywa Trójmorza pomoże przelamać zapóźnienia rozwojowe względem Zachodu*, Klub Jagielloński, February 23, 2021, <https://klubjagiellonski.pl/2021/02/23/inicjatywa-trojmorza-pomoze-przelamac-zapoznienia-rozwojowe-wzgle-dem-zachodu/> (accessed: December 31, 2021).
- Perspectives for Infrastructural Investments in the Three Seas region*, SpotData, 2019, https://3siif.eu/wp/wp-content/uploads/2019/11/SpotData_Report_Three-Seas-region.pdf (accessed: December 31, 2021).
- Pieńkowski J., *Szósty szczyt Inicjatywy Trójmorza w Sofii*, „Komentarz PISM”, no. 56/2021, <https://www.pism.pl/webroot/upload/files/files2021/Komentarz%20PISM%20nr%2056-2021.pdf> (accessed: December 30, 2021).
- Popławski K., Jakóbcowski J., *W kierunku budowy bliższych powiązań. Trójmorze jako obszar gospodarczy*, Polski Instytut Ekonomiczny, August 2020, <https://>

- pie.net.pl/wp-content/uploads/2020/08/PIE-Trojmorze_raport.pdf (accessed: December 31, 2021).
- Potrzeba 600 mld EUR na infrastrukturę w regionie Trójmorza*, BGK, May 19, 2021, <https://media.bgk.pl/140735-potrzeba-600-mld-eur-na-infrastruktura-w-regionie-trojmorza> (accessed: December 31, 2021).
- Przychodniak M., *Chiny wobec kryzysu inicjatywy 17+1*, „Biuletyn PISM”, no. 26 (2224), February 9, 2021, https://www.pism.pl/publikacje/Chiny_wobec_kryzysu_inicjatywy_171_ (accessed: December 22, 2021).
- Restated Articles of Association of the Three Seas Initiative Investment Fund S.A. SICAV-RAIF*, Registre de Commerce et des Sociétés Luxembourg, B 234.989, 30.06.2020, <https://www.lbr.lu/> (accessed: December 31, 2021).
- R.Power raises €150 million investment and welcomes the Three Seas Initiative Investment Fund as a new investor*, *Three Seas Initiative Investment Fund*, February 10, 2023, <https://3siif.eu/news/r-power-raises-e150-million-investment-and-welcomes-the-three-seas-initiative-investment-fund-as-a-new-investor> (accessed: November 22, 2023).
- Smart Connectivity*, 3seas.eu, <https://3seas.eu/about/smart-connectivity>. Smart Connectivity. Vision paper, https://media.voog.com/0000/0046/4166/files/Smart_Connectivity.pdf (accessed: December 29, 2021).
- Sprawozdanie Zarządu z działalności grupy kapitałowej Banku Gospodarstwa Krajowego w 2019 r.*, Bank Gospodarstwa Krajowego, May 18, 2020, https://www.bgk.pl/files/public/Pliki/Sprawozdanie_finansowe/2019-skonsolidowane/GK_BGK_SSD_2019.pdf (accessed: December 31, 2021).
- Sprawozdanie Zarządu z działalności grupy kapitałowej Banku Gospodarstwa Krajowego w 2020 r.*, Bank Gospodarstwa Krajowego, April 15, 2021, https://www.bgk.pl/files/public/Pliki/Sprawozdanie_finansowe/2020-skonsolidowane/SSD_BGK_2020_pl.pdf (accessed: December 31, 2021).
- Sprawozdanie Zarządu z działalności Grupy Kapitałowej Banku Gospodarstwa Krajowego w 2021 roku*, Bank Gospodarstwa Krajowego, April 14, 2022, https://www.bgk.pl/files/public/Pliki/Sprawozdanie_finansowe/2021-skonsolidowane/SSD_BGK_2021-12-31_PL.pdf (accessed: November 22, 2023).
- Sprawozdanie Zarządu z działalności Grupy Kapitałowej Banku Gospodarstwa Krajowego w 2022 roku*, Bank Gospodarstwa Krajowego, 2023, https://www.bgk.pl/files/public/Pliki/Sprawozdanie_finansowe/2022-skonsolidowane/SSD_BGK_2022-12-31_PL.pdf (accessed: November 22, 2023).
- Supernak B., *Fundusz Trójmorza zainwestował w estońską spółkę Greenergy Data Centers*, *Inwestycje.pl*, December 04, 2020, <https://inwestycje.pl/biznes/fundusz-trojmorza-zainwestowal-w-estonska-spolke-greenergy-data-centers/> (accessed: December 31, 2021).

- The operating principles of the 3SIIF will be introduced today*, 3seas.eu, April 29, 2021, <https://3seas.eu/media/news/the-operating-principles-of-the-3siif-will-be-introduced-today> (accessed: December 31, 2021).
- The Second Three Seas Stock Exchanges Conference – dzień II – 8 października*, October 08, 2021, <https://www.youtube.com/watch?v=GZ208tKRDTY> (accessed: December 31, 2021).
- The Second Summit of The 3 Seas Initiative. Joint Declaration*, prezydent.pl, https://www.prezydent.pl/storage/file/core_files/2021/8/9/e6fc2d95a32c-58f692a31cda9f0b1d7c/ii_szczyt_inicjatywy_trojmorza_final_version.docx (accessed: December 8, 2021).
- The Three Seas Initiative Civil Society Forum 2022 Connecting States, Regions, and Societies: Debating, Innovating, and Acting. Policy recommendations*, https://media.voog.com/0000/0046/4166/files/Policy_Recommendations.pdf (accessed: February 15, 2024).
- The Three Seas Initiative Investment Fund*, HBOR, <https://www.hbor.hr/en/three-seas-initiative-investment-fund/> (accessed: December 31, 2021).
- The Three Seas Fund makes its first energy investment*, Three Seas Initiative Investment Fund, May 26, 2021, <https://3siif.eu/news/the-three-seas-fund-makes-its-first-energy-investment> (accessed: December 31, 2021).
- Three Seas House in Davos*, Three Seas Initiative Investment Fund, May 25, 2022, <https://3siif.eu/news/three-seas-house-in-davos> (accessed: November 22, 2023).
- Three Seas Initiative (3SI)*, Republic of Estonia – Ministry of Foreign Affairs, <https://vm.ee/en/three-seas-initiative-3si> (accessed: December 31, 2021).
- Three Seas Initiative Investment Fund*, <https://3siif.eu/> (accessed: December 31, 2021).
- Three Seas Initiative Investment Fund signs agreement to invest in greenfield gas infrastructure in Romania*, Three Seas Initiative Investment Fund, May 24, 2022, <https://3siif.eu/news/three-seas-initiative-investment-fund-signs-agreement-to-invest-in-greenfield-gas-infrastructure-in-romania> (accessed: November 22, 2023).
- Three Seas Initiative Investment Fund Virtual Mini-conference in May hosted by EXIM Hungary*, Exim Hungary, June 2021, <https://exim.hu/en/cik-klista/146-press-releases/1360-three-seas-initiative-investment-fund-virtual-mini-conference-in-may-hosted-by-exim-hungary> (accessed: December 31, 2021).
- Three Seas One Opportunity*, <https://www.3s1o.org/> (accessed: November 22, 2023).
- Three Seas Virtual Summit, Smart Money*, October 19, 2020, <https://www.youtube.com/watch?v=GA56ayy5vGM> (accessed: December 31, 2021).

- Trijų jūrų iniciatyvos investicinio fondo konferenciją*, Facebook, November 17, 2021, <https://www.facebook.com/events/672185143767961/> (accessed: December 31, 2021).
- Undersecretary Keith Krach: U.S. will invest up to \$1 billion in 3SI*, 3seas.eu, October 19, 2021, <https://3seas.eu/media/news/undersecretary-keith-krach-u-s-will-invest-up-to-eur1-billion-in-3si> (accessed: December 31, 2021).
- U.S. International Development Finance Corporation and the Three Seas Initiative Investment Fund agree to term sheet for up to US\$300 million in financing*, Three Seas Initiative Investment Fund, June 20, 2022, <https://3siif.eu/news/u-s-international-development-finance-corporation-and-the-three-seas-initiative-investment-fund-agree-to-term-sheet-for-up-to-us300-million-in-financing> (accessed: November 22, 2023).
- Widzyk A., *FAZ: Supermocarstwa rywalizują o wpływy w Europie Środkowo-Wschodniej*, DW, October 13, 2020, <https://www.dw.com/pl/faz-supermocarstwa-rywalizuj%C4%85-o-wp%C5%82ywy-w-europie-%C5%9Brodkowo-wschodniej/a-55253889> (accessed: December 22, 2021)
- Wilczek J., Rudowski A., *Fundusz Trójmorza. W stronę instytucjonalizacji Inicjatywy?*, Warsaw 2021
- Wnuk-Lipiński E., *Rozpad połowiczny. Szkice z socjologii transformacji ustrojowej*, Warsaw 1991.
- Wspólna Deklaracja Czwartego Szczytu Trójmorza*, prezydent.pl, <https://www.prezydent.pl/aktualnosci/wypowiedzi-prezydenta-rp/wystapienia/wspolna-deklaracja-iv-szczytu-inicjatywy-trojmorza,3942> (accessed: December 28, 2021).
- Wspólna deklaracja w sprawie Inicjatywy Trójmorza Dubrownik 2016*, prezydent.pl, <https://www.prezydent.pl/aktualnosci/wizyty-zagraniczne/wspolna-deklaracja-w-sprawie-inicjatywy-trojmorza,2909> (accessed: December 28, 2021).
- Zenderowski R., *Geopolityka Trójmorza*, Warsaw 2021.