

PUBLIC

**DOCUMENT OF THE EUROPEAN BANK
FOR RECONSTRUCTION AND DEVELOPMENT**

**STRATEGY FOR THE PROMOTION OF
GENDER EQUALITY 2016-2020**

**REPORT ON THE
INVITATION TO THE PUBLIC TO COMMENT**

PUBLIC

**Report on the Invitation to the Public to Comment
Strategy for the Promotion of Gender Equality.
Making business transformative: Creating Opportunities for All**

Introduction

In accordance with the 2011 Public Information Policy, stakeholder comments were requested during the review/revision of the draft “Strategy for the Promotion of Gender Equality: Making Business Transformative: Creating Opportunities for All” (from now on “Gender Strategy”).

The draft Gender Strategy was disclosed on the EBRD website from 30th of July 2015 until 22nd October 2015 in English, Arabic, French, Russian, and Turkish languages, on the following pages <http://www.ebrd.com/ebrd-and-gender-equality-overview.html> and <http://www.ebrd.com/strategies-and-policies/have-your-say.html> and on the intranet page <http://intranet.ebrd.com/ebrdnet/depts/ed/gender/index.shtml>.

The announcement of the publication of the draft Gender Strategy was sent to all staff in the EBRD via a Bank-wide email on the 2nd of September 2015. It was also shared with all members of the EBRD Gender Working Group, with members of the Environmental & Social Advisory Council, and with experts and consulting companies from the Gender Advisory Services framework (listed in Annex 1). The draft Gender Strategy has also been shared with select EBRD clients, with bilateral shareholders and Multilateral Development Banks (MDBs) Group (listed in Annex 1).

In an effort to gather information and insight for the development of the Gender Strategy, the EBRD organised a series of public meetings in Almaty, Amman, Ankara, Istanbul, Rabat, Yerevan and London in September – October 2015. Potential stakeholders accessed all relevant information on the process through this link: <http://ebrd-public-consultations.rec.org/>.

The Regional Environmental Centres for Central and Eastern Europe (REC) and for Central Asia (CAREC) were selected as an implementing partner to assist the EBRD in the organisation of the consultation meetings.

This report comprises: i) an overview of the various consultations that took place (Section 1); and, the comments received from clients, Civil Society Organisations (CSOs) and other stakeholders during the consultations on the draft revised Gender Strategy, as well as management responses to such comments (Section 2). The comments have all been reviewed and reflected in the revised Gender Strategy document where appropriate. Annex I presents a list of other stakeholders consulted. Annex II presents the list of organizations which participated in the consultations meetings.

1. Summary of the Consultation Process

The consultation process took the form of a) a client questionnaire; b) public consultation meetings; and c) bilateral meetings.

a) Client Questionnaire

The EBRD Gender Team sought the views of clients (12 in total) on the proposed draft Gender Strategy. Ten out of twelve (83%) of the clients contacted answered the questionnaire, including both private and public sector clients, and covering a wide geographic range (Belarus, Egypt, Kyrgyz Republic, Bosnia and Herzegovina, Romania and Turkey). With a number of clients, follow up interviews took place to discuss and obtain further feedback on some aspects of the questionnaire. The questionnaire included questions about the draft strategy, as well as about the technical assistance and support provided by EBRD in the area of gender.

Overall, the majority of clients thought that the EBRD Gender Strategy was clear and comprehensive with realistic and appropriate objectives, but some clients (25%) highlighted that many companies are facing financial challenges and would not be able to invest in new Human Resources (HR) policies/practices. All of them thought that the Gender Strategy can contribute/partly contribute towards closing some of the gender inequalities in their country and, in particular, regarding the gender gaps in accessing services.

Two out of ten clients identified the loan negotiation and before the loan disbursement as the best time for EBRD to discuss the possibility to develop an equal opportunity initiative in their company. In addition, during discussions with EBRD staff, clients stressed the importance of not only training their staff but also creating ownership among senior management. Clients were of the view that without the senior management's support, gender initiatives are not sustainable in the long term.

The majority of clients interviewed (9 out 12) said that the technical support of the EBRD's gender team was appropriate and context- specific. The majority of the clients were satisfied with the quality of the technical assistance provided.

Overall, the majority of the clients consider staff training as the most effective technical assistance provided, followed by the dialogue with the Chief Executive Officers and building the business case for gender equality. One client out of 12 found the exchange of information regarding similar experience useful and another mentioned that the research/surveys on users' perceptions on a specific service as a useful contribution from EBRD.

Through the survey, clients also identified areas which could be improved upon in future. One third of surveyed clients thought that communication could be improved; one third suggested that the expertise from consultants needed to be improved and only one client asked for more focus on increasing awareness of HR managers. A large majority of clients thought that an exchange of good practices on gender equality within their sector and country (together with establishment of benchmarks from the region) could improve their knowledge on how to address relevant gender issues in their business.

b) Summary of the Profile of the Public Consultations

The Bank requested comments on the basis of the revised (post Financial and Operations Policies Committee) draft Strategy for the Promotion of Gender Equality as from 30th July 2015. Over 200 sets of comments were received by the 22nd October 2015 deadline, including comments from seven public meetings with stakeholders including corporates, Civil Society Organisations (CSOs), Non-Governmental Organisations (NGOs), International NGOs and

international cooperation agencies, academia and a number of gender consultants. Annexes 1 and 2 include details of the stakeholders consulted and participants at the public consultation meetings.

Table 1: List of Public Consultation Meetings		
Date	Place	Number Attendees
6 August 2015	Yerevan, Armenia	8
14 September 2015	Amman, Jordan	40
21 September 2015	Rabat, Morocco	21
7 October 2015	Almaty, Kazakhstan	11
7 October 2015	Istanbul, Turkey	25
9 October 2015	Ankara, Turkey	27
12 October 2015	London, UK	10

Table 2 overleaf summarises the diversity of those that participated in the consultation process. Of a total 280 registered participants, 142 representatives (113 women and 29 men) attended from 18 different countries. The majority (74) represented NGOs, CSOs, associations, trade unions or EBRD clients. The second largest group (26) were representatives of ministries or other governmental institutions and municipalities: this is a sound indication of the well-established relationship of the Bank in its Country of Operations. Sixteen people persons participated on behalf of consulting companies or as free-lance consultants, 11 represented academic institutions, universities and research centres, 10 represented Bilateral Cooperation Agencies or Embassies and 5 participated as United Nations Agencies' or International NGOs' representatives.

Sixty-two potential participants submitted requests for financial support to participate in the public consultation meetings and 26 (21 women and 5 men) were selected and funding granted (based on a pre-established criteria administered by REC – see Table 3 overleaf). Five were unable to attend for health or personal reasons.

In addition, EBRD was invited to present the draft Gender Strategy in a Webinar organised by the Institute for Environmental Management and Assessment (IEMA) on “Gender Matters: Managing inequality in development via Environmental and Social Impact Assessment (ESIA)” (Webinar took place on the 24th of September). The webinar provided a review of how gender issues are considered by International Finance Institutions (in particular EBRD) and managed via their respective Environmental and Social Impact Assessments. Around 30 participants joined the Webinar.

	Women	Men	Governmental Institutions/ Municipalities	Academia (Universities, Research Centres)	NGOs/CSOs/ clients	Bilateral cooperation Agencies/ Embassies	UN / INGOs	Consultants (including companies)
Albania	1				1			
Armenia	8				7		1	
Croatia	1				1			
Egypt	1				1			
FYR Macedonia	1				1			
Georgia	2				2			
Jordan	32	7	7	3	20	4	2	3
Kazakhstan	1				1			
Kyrgyz Republic	2	1	1		2			
Montenegro	2				2			
Morocco	11	8	3		14	1		1
Slovenia	1				1			
Tajikistan	3				3			
Tunisia	2				2			
Turkey (Ankara)	17	9	14		8	2		2
Turkey (Istanbul)	18	1	1	6	6	2		4
Turkmenistan	1			1				
Ukraine	1				1			
Uzbekistan	1	1		1	1			
London	7	1					2	6
Gambia		1				1		
Total (142)	113	29	26	11	74	10	5	16

	Yerevan	Amman	Rabat	Istanbul	Almaty	Ankara	London	Total
Requested	0	8	12	16	20	6	10	62
Granted	0	1	8	6	7	2	2	26

c) Bilateral Public Consultation Meetings

Table 4 overleaf provides a list of the bilateral public consultation meetings and the dates on which these took place.

Date	Place	Organisation
14 Sept 2015	Amman, Jordan	Business and Professional Women Association
21 Sept 2015	Rabat, Morocco	<ul style="list-style-type: none"> - UN Women - Ministry of Solidarity, Women, Family and Social Development - African Development Bank - Delegation of the European Union in Morocco
24 Sept 2015	Geneva, Switzerland	ILO
28-29 Sept 2015	Washington DC, USA	<ul style="list-style-type: none"> - US Treasury - World Bank Group - US State Department - The Climate Investment Fund
28 Sept 2015	Brussels, Belgium	<ul style="list-style-type: none"> - European Commission (DEVCO, DG Justice, DG NEAR (Neighbourhood and Enlargement) CONDORD (Europe NGO Platform for Relief and Development))
1 Oct 2015	New York, USA	<ul style="list-style-type: none"> - UNDP - UN Women - UNICEF
7 Oct 2015	Almaty, Kazakhstan	World Bank
7 Oct 2015	Istanbul, Turkey	<ul style="list-style-type: none"> - UN Women - UNDP - KAGIDER (Women Entrepreneurs Assoc.)
9 Oct 2015	Ankara, Turkey	Ministry of Family and Social Policies

2. Comments Received

The comments received have been comprehensive and covered all aspects of the Gender Strategy, ranging from the intersectional aspects of gender inequality and its interactions with other forms of social exclusion, to the diversity of socio-economic systems in which gendered processes are found (e.g., rural-urban gradations, countries at different stages of market and political transition,) to the necessity to take into consideration the axes of vulnerability and poverty that are time-bound (e.g., during disasters, conflict, displacement or migration).

Particular interest from stakeholders related to the tools to implement, monitor and measure the impact of the Gender Strategy together with opportunities to engage men in its implementation. Details were also requested on the policy dialogue that the EBRD would undertake to promote gender equality in transition economies.

As is standard EBRD practice, the commenters' identities for individual comments are not disclosed, so that the comments could be evaluated on their own merit.

3. EBRD Responses

The report contains both the written submissions received by email from diverse stakeholders and the comments (with related responses) discussed during the public and bilateral consultation meetings. Length and complexity of responses vary depending on the context of each consultation meeting and on how the questions are related to the Strategy. EBRD has used a consistent approach in its responses. However due to the complexity of certain questions, some answers are substantially longer. This does not mean the issue is of more

importance. To avoid any repetition, the comments have been organised by themes with one common response covering questions which are similar.

EBRD believes that the draft Gender Strategy has greatly benefitted from this consultation period and the Bank is appreciative of the time and effort made by so many to help improve the document. The EBRD thanks all contributors for their comments.

Abbreviations

CCA	Climate Change Adaptation
CoOs	Countries of Operation
CRM	Concept Review Memorandum
CSE	Country and Sectors Economics
CSEU	Civil Society Engagement Unit
CSOs	Civil Society Organisations
CSRF	Country Strategy Results Framework
CSRM	Country Strategy Results Management
DCF	Donor co-financing
EBRD	European Bank for Reconstruction and Development
ESD	Environmental Sustainability Department
ESP	Environmental & Social Policy 2014
EU	European Union
EU DEVCO	EU Directorate-General for International Cooperation and Development
HR	Human Resources
ICA	Industry, Commerce and Agribusiness
IFI	International Financial Institution
ILO	International Labour Organisation
INGOs	International Non-Governmental Organisations
LGBTI	Lesbian, Gay, Bisexual, Transgender/Transsexual and Intersexed
MEI	Municipal and Environmental Infrastructure
NGOs	Non-Governmental Organisations
OCE	Office of the Chief Economist
OGC	Office of the General Counsel
OHCHR	Office of the High Commissioner for Human Rights
SBS	Small Business Support
SDGs	Sustainable Development Goals
SEMED	Southern and Eastern Mediterranean
SGI	Strategic Gender Initiative
SMEs	Small and Medium sized Enterprises
TC	Technical Cooperation
UN	United Nations
UNFT	Union Nationale de la Femme Tunisienne
UNDP	United Nations Development Programme
WIB	Women In Business

Table 5: Results of the Consultation on the EBRD Draft Gender Strategy

Issue	Comment	Contributor	Management Response	Reference Revised Version
<p>General comment</p> <p><i>Comment during consultation meeting</i></p>	<p>The Strategy is comprehensive and very much welcomed. However, it seems too much to handle by a small team of gender experts. Perhaps it is too ambitious?</p>	<p>Tajikistan</p>	<p>In order to deliver the Gender Strategy with the Bank’s existing resources, EBRD staff and resources will be targeted at areas where the needs are judged to be greatest. For example, the Strategy proposes to prioritise resources to those countries and regions where the gender gaps are judged to be the largest, whilst still leaving scope for projects in non-prioritised countries that may be developed in circumstances where there is a compelling transition rationale to do so. This prioritisation, together with appropriate planning will enable the Bank to be effective in delivering the Strategy with the available financial and human resources.</p>	
<p>General Comment</p> <p><i>Written comment</i></p>	<p>We applaud the structure of the Strategy, which for each priority area also highlights the business case, and then follows up with responses through investment and policy dialogue. While the Strategy mentions 4 global themes of gender under the strategic fit, it does not provide many specifics as to what that means for the new Gender Strategy, i.e. how to engage men etc. The introduction when framing the Strategy could refer to increased client demand both on the public and the private sector side in addition to international frameworks such as SDGs, financing</p>	<p>World Bank</p>	<p>The Strategic Fit section outlines the ways in which the Gender Strategy aligns with Bank priorities and initiatives. The global themes present a specific subset of the much wider Global Themes affecting gender equality, which the Bank has identified as those to which it can best lend agency. Details as to how the Bank will address some of the themes through operations can be found in Annex 3. An internal operational plan (2016-2017) will be developed to guide the Gender Strategy implementation.</p>	<p>Addressed in Section 2.1 “Objectives” and Annex 3.</p> <p>Section 1.3 has been revised to reference further the 2030 Agenda alongside further information in Annex 6</p>

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	for development, G20, UN WEPs, etc.			
General Comment <i>Written comment</i>	Structure. The document could flow more smoothly if the introduction section is rearranged, to start with the global context and the state of gender equality, position the strategy within the current global discussions and debate, such as the World Development Report on Gender Equality and Development of 2012, clearly linking gender equality to economic growth and its complementary region specific reports, the SDGs and the post 2015 agenda and making the case for equality of opportunity. This can be followed by the situation of the EBRD countries and the challenges they face then the experience of EBRD and the lessons learnt. This way the reader will be prepared to move to section 2, which is the Strategy itself.	UN Women	The document has been re-structured for clarity and coherence. The Introduction is sequenced logically to introduce to the reader the rationale for focusing on the issue from an economic standpoint, it then describes the situation in EBRD Countries of operations (CoOs), and draws lessons and identifies synergies with the international agenda, as well as reflecting on the Bank's experiences and lessons learned.	Addressed in Section 1
General Comment <i>Written comment</i>	Structure. Section two could be divided into two sections: the different elements/pillars of the Strategy are presented (the What) and; the Implementing/Operationalizing the Strategy where the operational approaches for implementing the strategy will be discussed (the How). The section on implementing the	UN Women	Section 2 has been revised to present the 'what' (Objectives; The Strategic Fit; Policy Dialogue) and the 'how' (The Operational Approach; Access to Finance including support of entrepreneurship; Access to Employment & Skills; Access to Services; Technical Cooperation and Donor Funding; Partnerships). This will be developed as part of the internal	Addressed in Section 2

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	<p>strategy could be from section 2.3 on operational approaches to section 2.3.4.</p> <p>As part of implementing the Strategy, a section on roles and responsibilities could be added for accountability purposes (who is the custodian of the strategy? What is the role of the different departments? Who will report on its implementation).</p> <p>The strategy could have a section as part of implementing the strategy on human and financial resources available or to be mobilized for implementing it.</p>		operational plan following the approval of the Strategy.	
<p>General Comment</p> <p><i>Written comment</i></p>	<p>Language suggests gender equality is not included as one of the Bank's safeguards. OHCHR suggest stronger guarantees, possibly by strengthening language throughout strategy to make more binding and operational for Bank staff and stakeholders, e.g. strengthening the following kinds of formulations and adding more specifically/concretely what is meant: "contribute to", "enhance", "strengthen", "pay due attention to", "seek opportunities", etc.</p>	OHCHR	<p>Under section 2.2.3, the strategy explains that under the Environmental and Social Policy (ESP) 2014, the Bank addresses gender inequalities as part of the assessment of projects, ensuring that projects will not have disproportionate social and/or environmental impacts on either men or women. Performance Requirement 2 (Labour and Working Conditions), in particular is of note as it aims to mitigate against all forms of discrimination in line with ILO Conventions 100 and 111. In addition, projects may be structured not only to mitigate adverse impacts but also to build sustainability through promoting gender equality with regards to access to employment and skills and services, in line with the broader ambitions of the Sustainable Development</p>	<p>Addressed in Section 2.2.3 "Commitment to Sustainable Development"</p> <p>and 2.4 "Operational Approach"</p>

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Issue	Comment	Contributor	Management Response	Reference Revised Version
			Goals (Target 5).	
<i>Written comment</i>	Focus seems to be primarily on where gender equality benefits economically, and only in certain contexts - "gender equality of opportunity in priority countries". OHCHR suggests expanding. It might be too limiting and title of strategy could therefore be perceived as misleading. Further, the strategy is focused on access to "Finance", "Employment" and "Skills and Services". Perhaps this should similarly be reflected in the title.	OHCHR	The sub-title of the Gender Strategy ‘Making Business Transformative: Creating Opportunities for All’ aims to clarify the Bank’s focus according to its mandate and business model. The Bank will continue targeting three areas or three “accesses” through which projects are most likely to be effective in reducing gender gaps.	
<i>Comment during consultation meeting</i>	Which is the EBRD approach towards Sustainable Development Goals (SDGs): how EBRD will align on those through support of private sector?	Amnesty International London	EBRD will define its engagement related to the SDGs. However some work and synergies have been established already with UN Women and ILO to work on this.	EBRD contribution to SDGs has been addressed in Section 1.3 “The International Agenda” and its partnerships under 2.6
<i>Written comment</i>	The Strategy nicely conveys how it relates to SDG goal number 5 on gender equality by mentioning the two targets under the gender goal that are relevant to EBRD’s work: decision making and equal rights to economic resources. The team may want to highlight how gender equality can help achieve other SDG goals that fall within EBRD’s areas of	World Bank	This has been included in an annex for further clarity including the goals and targets the Bank can contribute to.	Addressed in Annex 6: EBRD Gender Equality and the Sustainable Development Goals

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Issue	Comment	Contributor	Management Response	Reference Revised Version
	engagement.			
Multi dimension of gender <i>Written comment</i>	WECF welcomes the approach to support the “access” of women to finances, employment and services. A key prerequisite of “access to” is the “right to”. This approach is not continuously followed by the strategy. But also the entitlement to a right might not be sufficient if the implementation of a right, including access to justice, is not guaranteed. This varies from country to country and needs a thorough legal analysis before the appropriate solution is developed. Furthermore, there is more access to resources needed for women to be empowered than within the three key areas suggested by the strategy, e.g. land and other natural resources are key for women when providing for the daily living of their families. Access is strongly interlinked with other social dimensions, such as poverty (often affecting women – in particular rural women), lack of education or discriminatory practices, e.g. caused by traditional and/or religious norms. This needs to be taken up by the strategy.	Women in Europe for a Common Future (WECF)	The Gender Strategy takes into account that gender gaps intersect with other barriers including legal barriers and social norms (see case study 1) For example, Table 2 - <i>Gender & equality of opportunity in EBRD CoOs: summary of findings</i> illustrates that gender equality encompasses diverse and pressing challenges, the EBRD is guided by its transition mandate and its role, therefore, in addressing gender equality is principally through the promotion of equality of opportunity. It will do this to further support the commitments many of its CoOs have made towards ensuring the equal rights of men and women and the prohibition of discrimination. Further information on how the EBRD will address gender inequality within its mandate can be found under Section 2.2.1	Addressed in Section 1.3 “The International Agenda 2015”. Section 1.4 includes the key lessons Case Study 1 gives an example of work on legal barriers.
Multi dimension of gender	Women should not be treated as a homogenous group. Gender cuts across with many other dimensions, such as age, ethnicity and disability and the	Multiple (many participants)	See response above	

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<i>Comment made during consultation meeting</i>	Gender Strategy will need to address the needs of different socio-economic and demographic groups.	Almaty		
<i>Written comment</i> Multi dimension of gender	While present in parts of the document, including a nicely elaborated footnote 9 on page 6, the Strategy might highlight more (including in its Executive Summary), the intersectional aspects of gender inequality, interactions with other forms of social exclusion (including ethnicity, age, migrant status, sexual orientation, et cetera), as well as the diversity of socioeconomic systems in which gendered processes are found (e.g., rural-urban gradations; countries at different stages of market and political transition). The Executive Summary still presents women as a rather homogenous and undifferentiated grouping. Further social disaggregation might also help identify other axes of vulnerability and poverty that are time-bound (e.g., during disasters, conflict, displacement or migration), in ways that have not been fully problematized in the Strategy as of yet.	World Bank	See response above	
Multi dimension	Important to recognize in the strategy at the outset that "gender" encompasses not	OHCHR	See response above	

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of gender <i>Written comment</i>	only women, even though ensuring women's equality and their rights is a critical aspect of gender integration. This could be acknowledged alongside a definition of gender generally. For example, we should not forget gender-related violations to the rights of LGBTI persons or gender-specific violations that affect men (e.g. of caning of male prisoners in South East Asia, or gender stereotypes regarding men).			
Multi dimension of gender/ Indigenous <i>Written comment</i>	Suggest including consideration of the rights of indigenous peoples, rural versus urban, displacement and gender issues, disabled persons, as well as intersectional or compounded forms of discrimination	OHCHR	Indigenous peoples are addressed in EBRD's Environmental and Social Policy (PR7) where it is noted that indigenous women face double discrimination, on the basis of their gender and their ethnic group aggravated by language barriers, ethnic discrimination, and sometimes poverty.	Addressed through reference to the ESP and throughout the text where appropriate.
Multi dimension of gender <i>Written comment</i>	The Strategy doesn't specify specific approaches for targeting the different groups of women (rural/urban, young/old and so forth). Moreover, it is not clear how to operate in the context of post conflict and transition like in the countries in SEMED.	UN Women	See response above Recognition is in place throughout the document covering how policy dialogue will be adapted as the context in which the Bank operates may change so as to address emerging global challenges such as climate change, migration and conflict.	Addressed in Section 2.2.1 "Transition Impact", Page 16 in the part related to intersectional issues in data collection. Section 2.3 "Policy Dialogue" and Annex 3
Human Rights approach <i>Written</i>	Suggest fully grounding strategy in human rights (perhaps similar to approach taken for the SDGs):	OHCHR	Table 2 - Gender & equality of opportunity in EBRD CoOs: summary of findings illustrates that gender equality encompasses diverse and	Addressed in Section 1.3 "The International Agenda 2015"

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Issue	Comment	Contributor	Management Response	Reference Revised Version
<i>comment</i>	development that aims at "realizing the human rights of all and to achieving gender equality and the empowerment of all women and girls". Further, explicit recognition of the need to address discrimination of all forms could be considered in the strategy (including gender, sexual orientation or gender identity, race, ethnicity, caste, disability, persons affected by HIV/AIDS, etc.).		pressing challenges, the EBRD is guided by its transition mandate and its role, therefore, in addressing gender equality is principally through the promotion of equality of opportunity.	
Human Rights approach <i>Written comment</i>	The EBRD rationale for promoting gender equality would be strengthened if the economic rationale were complemented by a rights-based approach, given that many of the EBRD's Countries of Operation (CoOs) have already made commitments to most of the existing international frameworks. The suggestion is to move the substance from Annex 5 to the body of the text.	UN Women	See response above	Addressed in Section 1.3 "The International Agenda 2015"
Human Rights approach <i>Written comment</i>	The draft strategy includes lessons learned from previous EBRD projects, which are valuable and have to be taken into account. However, the main driver for gender equality is not reflected within the strategy. Gender equality is a human right, which is as such not visible within the strategy. This overarching principle should be part of the strategy showing the special attention needed to be given to the issue.	Women in Europe for a Common Future (WECF)	See response above	Addressed in Section 1.3 "The International Agenda 2015" and Annex 6.

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	Therefore, WECF recommends, to base all the global gender themes (identified within the strategy) as well as the overall operational approach on a rights based approach, putting gender equality and women's rights at the heart of the policy. This is also reflected within the new SDGs (adopted by the UNGA in September 2015) with a standalone gender goal (No 5) and crosscutting gender targets throughout the set of 17 goals.			
Human Rights approach <i>Written comment</i>	EBRD's failure to take a rights-based approach to gender equality has resulted in a limited vision of gender equality of economic opportunity " <i>as a key tool</i> " for promoting efficient market transition. By making the business case for gender equality this approach may ensure stronger ownership of the Strategy by the Bank, but it is a missed opportunity for aligning the Strategy with the Bank's unique Sustainable Development mandate. Without a persuasive presentation of the EBRD's strategic approach to safeguarding gender rights, the draft of the Strategy lacks justification for choosing to promote women while refusing to protect them.	CEE Bankwatch Network	See response above	
Overarching trends and	Overarching trends and contextual factors (including economic and climate	World Bank	The document has been revised to include increased discussion of trends and contextual	Addressed in different parts of the document including Section

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contextual factors <i>Written comment</i>	drivers) could be better highlighted earlier in the document, including an elaboration of how these might be expected to affect the portfolio and proposed activities under the Strategy. Such discussion might address, for example: climate change impacts; banking and economic crises; migration flows; political and security instabilities; and general demographic trends (including aging of the population and urbanization).		factors, including mention of climate change impacts; banking and economic crises; political and security instabilities.	2.4 “The operational approach”
Disabled people <i>Comment during consultation meeting</i>	Disabled people and women should be mentioned in the Strategy to ensure that they have equal rights with others	Human Society for Rights of Disabled People Jordan	In the EBRD Environmental and Social Policy, people with disabilities are included in terms of non-discrimination.	Referenced through the link to ESP and where appropriate in document (access to services, etc)
Youth <i>Comment during consultation meeting</i>	Youth employment (without qualification and with education) in key sectors such as automobile and aeronautical industries should be promoted and highlighted in the draft Gender Strategy as a priority	Confédération Générale des Entreprises du Maroc (CGEM) Morocco	Through its work on inclusion, EBRD aims to promote gender and young people employability in addition to addressing regional inequalities. The strategy states, “Additionally, gender gaps intersect with other barriers to economic inclusion. These include youth unemployment and the higher barriers faced when seeking employment by those that live in rural, economically less-developed regions compared to those living in the more developed, urban areas – even within the same country”	Addressed in Section 2.2.1

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Issue	Comment	Contributor	Management Response	Reference Revised Version
Youth <i>Comment during consultation meeting</i>	EBRD Gender Strategy could emphasize better the need to promote youth employment	Tajikistan	See response above	
Syrian refugees <i>Comment during consultation meeting</i>	Turkey now hosts about two million Syrian refugees many of whom stay in refugee camps. When peace comes to Syria it would be good to employ women refugees. Is the EBRD working on any such plans?	Istanbul Arel University Turkey (Istanbul)	The presence of Syrian Refugees represents a major challenge for Turkey and one of the biggest challenges for IFIs in the country. The Bank is actively devising its intended approach, potentially looking at two areas: providing support via Partner Financial Institutions for SMEs with a view to enhancing economic opportunities, and addressing the significant burden on the provision of municipal services. (e.g. water supply, waste management, public transport). EBRD is working with other partners in these specific domains.	
Syrian refugees <i>Comment during consultation meeting</i>	Some EBRD CoOs, especially in the Western Balkans, are in a specific situation in relation with EU accession. How will EBRD then address the changing economic and social environment, including the issue of refugees, which will have a certain impact on sustainable economic development and efforts to advance gender equality? How will EBRD	Tirana, Albania Reflexione, Women's Association dealing with gender equality, women's rights and women's empowerment	EBRD is aware of the challenges presented by the refugees' crisis to some of our COOs. The Bank has established a Working Group to devise an appropriate operational response, within its mandate, in those countries which are most affected, starting with Turkey and Jordan.	

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	address the changing environment?	Albania		
Climate change <i>Written comment</i>	Climate change should be described as one of the global trends.	Climate investment fund	Climate Change noted as ‘global challenge’	Addressed in Section 2.3 “Policy Dialogue”
Climate change <i>Comment during consultation meeting</i>	Does EBRD plan a project, which can connect women and climate change adaptation and mitigation process?	Kazakhstan	Climate change considerations are mainstreamed in the Bank’s operations and project assessment mechanism and operationalised via relevant strategies including the Gender Strategy. The Bank is working with the Global Environment Facility and the Clean Technology Fund (CTF) of the Climate Investment Fund, where funding and partnership engagement are contributing to assessing and improving the gender impact of that municipal sector that are funded via CTF. Gender assessments have been developed for operations in several countries such as Kazakhstan, Turkey and Ukraine. To orient future operations a toolkit is being developed to mainstream gender into district heating projects. It will be disseminated both internally and externally.	
Sustainable development <i>Written comment</i>	The draft of the Strategy states that ‘ <i>the Bank’s work to promote gender equality is most relevant to transition impact, additionality and sustainability</i> ’ and therefore it excludes the fourth of the EBRD’s key principles – Sound Banking, from the Strategic Fit	CEE Bankwatch Network	Gender Equality is identified in EBRD’s annual Sustainability Report as a central to the Bank’s approach to sustainability, alongside many other factors, including Economic Inclusion, the Sustainable Resource Initiative (SRI), Sustainable Energy Initiative, Water Efficiency and Materials Efficiency initiatives,	Addressed in Section 2.1 “Objectives”

Table 5: Results of the Consultation on the EBRD Draft Gender Strategy

Issue	Comment	Contributor	Management Response	Reference Revised Version
	<p>elaboration. Then in three sentences it suggests that the EBRD's Environmental and Social Policy (ESP), not the Strategy, is relevant to Sustainability.</p> <p>If compared to the dominating narrative in the draft of the Strategy of how gender equality of opportunity can help market transition, the link between gender and sustainable development is vague, perhaps because it is considered to be obvious. However, in view of the diverging definitions and perceptions of sustainability (for example some equate it or use it interchangeably with sustainable growth, climate action etc.), a clearer explanation of the EBRD's mandate and approach, especially through the gender prism is necessary.</p> <p>The Strategy should elaborate on how promoting gender equality relates to the Bank's mandate on Sustainable Development, similarly to the way it defines and details its links to Transition and Additionality.</p>		<p>etc. The Gender Strategy is an important step forward in translating broader sustainability goals into specific action. In paragraph 2.1 it is said: "mainstream gender by 2020 in recognition of the importance that this plays in re-energising transition, strengthening its resilience and building sustainability, whilst contributing to the global agenda"</p>	
<p>Literacy</p> <p><i>Comment during consultation meeting</i></p>	<p>Activities should focus on improving women literacy. And also there should be follow-up after efforts made, through for e.g. post-campaigns for literacy</p>	<p>RARBA-TIZNIT</p> <p>Morocco</p>	<p>EBRD does not work on education or on literacy programmes. However, in some of its projects EBRD has capacity building and training programmes.</p>	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
Literacy <i>Comment during consultation meeting</i>	Rural women illiteracy should be targeted in EBRD draft Gender Strategy	FYR Macedonia	See response above	
Rural women <i>Written comment</i>	Rural women should be included as specific target in the strategy	Climate investment fund USA	Access to Finance has been revised in the document to include rural women as starget of support in Women in Business (WiB) projects, and the Strategy includes work with rural women under the Employment theme, particularly in the context of agribusiness supply chains.	Addressed in Section 2.4.1 “Access to finance including support of entrepreneurship”
Rural women <i>Written comment</i>	EBRD should work also in smaller countries to support under- educated women in the rural areas	Georgia	See response above	
Rural women <i>Comment during consultation meeting</i>	There are indeed many programs for women on access to finance, employment and services. But we still need to work on matching this supply with demand. Especially for women in rural areas, access to finance is almost a utopia.	The Swedish Development Agency (SIDA) Turkey (Ankara)	See response above	
Rural women <i>Comment during consultation meeting</i>	Women in agriculture are facing specific challenging and lack of rights: the biggest companies are not respectful of human rights and women face abuse and don’t have social protection. These big companies exploiting rural women’s	UN Women Morocco	EBRD Environmental and Social Policy includes requirements to protect workers, including those sub-contracted. This comment will be taken into consideration in the context of the Bank’s work on supply chains.	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
	labour force are not accountable.			
Rural women/ cooperatives <i>Comment during consultation meeting</i>	Women’s cooperatives are important in the economy of a country and EBRD Gender Strategy should consider them as specific target group	Ministry of Family and Social Policies Turkey (Ankara)	This will be considered as part of our work with women-led SMEs in the context of WiB lending and advice. The Bank will explore opportunities to work with cooperatives through our supply chain initiatives envisioned under the Access to Employment and Skills area of the Strategy.	Addressed in Section 2.4.1 “Access to finance including support of entrepreneurship” and 2.4 “Operational approach”
Rural women/ Women-led SMEs <i>Comment during consultation meeting</i>	As part of the Strategy, will you be working to strengthen women’s associations and support small and medium sized (SMEs) businesses, especially those SMEs located in rural areas?	Kyrgyzstan	The Bank’s WiB programme, aims to support women entrepreneurs by assisting women-led small and medium sized businesses to access finance, know-how and advice. During the Strategy period the Bank will continue further refining its WiB programme so as to better tailor its offer to the needs of women entrepreneurs and will continue rolling out the programme into other countries of its operations.	
Awareness and communication <i>Comment during consultation meeting</i>	There is a need for a comprehensive social transformation program, which may not be possible to achieve under the umbrella of EBRD. But a general awareness creation campaign, at the local and national levels, would be useful before the uptake of the Strategy.	The Swedish Development Agency (SIDA) Turkey (Ankara)	The Bank will promote access to information in the context of its investments in areas such as legal rights and financial literacy. The Gender Strategy has been revised to include dissemination of information to address gender gaps in access to information and skills.	Addressed in Section 2.4.2 “Access to Finance including support of entrepreneurship”
Awareness and communication <i>Comment during consultation</i>	The Gender Strategy should better highlight the right of women (especially in rural areas) to access information, notably with communication plan and	Association ESPOD	See response above	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
<i>meeting</i>	awareness raising campaigns.	Morocco		
Access to information <i>Comment during consultation meeting</i>	Access to information by women, not just rural but urban women too, is one of the biggest problems. Awareness raising should be a priority for EBRD.	The Delegation of the EU to Turkey Turkey (Istanbul and Ankara)	See response above	
Legal literacy <i>Comment during consultation meeting</i>	A majority of women do not know their rights, obligations and responsibilities. Training would therefore be needed, especially in rural areas, and using a language that is adapted.	Union Nationale de la Femme Tunisienne (Union of Tunisian Women) Tunisia	See response above	
Access to information on EBRD projects <i>Comment during consultation meeting</i>	In the framework of right to access information and considering geographical isolation of some target groups, EBRD should develop communication plans and awareness raising campaigns at the occasion of the elaboration of agreements and programmes.	Noun consulting Morocco	The EBRD Environmental and Social Policies establish procedures for information dissemination and stakeholders engagement for EBRD investments.	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
Access to information <i>Written comments</i>	A broadening of women's access to information has to be undertaken, inter alia by guaranteeing proper access to communication technologies for girls and women, even for those who may be marginalised, including indigenous women, women with disabilities, women from rural areas and others.	Women in Europe for a Common Future (WECF)	This is captured within the document, for example, in the statement 'Access to infrastructure and utilities are important determinants of productive economic opportunities, both by directly facilitating access to income-earning activities (e.g. through transportation and ICT)'. ICT projects addressing the digital gender gap are also proposed in the document.	Addressed in Annex 3
Access to innovation and technology <i>Comment during consultation meeting</i>	Access to innovation and technology and social care are also important to women's empowerment. The EBRD should take these into consideration.	Turkey (Istanbul)	On ICT see the response above. On social care, EBRD addresses issues of social care and its impact on women's participation in the labour force in the context of our Equal Opportunities projects by promoting and designing work-life balance programmes or initiatives and practices among our clients	
Access to water <i>Written comments</i>	Is the strategy taking into consideration any specific action towards women's access to water?	US State Department	The recent Gender Gaps review (please see Annex 2) introduced a new gap dimension on infrastructure and municipal services that assesses the extent to which access to water, non-solid fuel, mobile phone or computer use can have disproportionate impacts on the economic opportunities of women.	
Social norms <i>Comment during consultation</i>	Social norms, especially in rural settings, have a great impact and impact gender equality	Association Tiqlit pour le développement rural et	The Gender Strategy acknowledges the key role of social norms and cultural values in EBRD region and beyond. EBRD finalised a study to better understand the role of social norms and legal framework in the region in	Addressed in Case Study 1

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Issue	Comment	Contributor	Management Response	Reference Revised Version
<i>meeting</i>		l'environnement Morocco	order to better design projects and policies. See case study 1.	
Quota /positive discrimination	Donors can impose same standards to women as for men. Positive actions would be needed in some cases (i.e. for rural cooperatives)	Association Tiqlit pour le développement rural et l'environnement Morocco	EBRD does not systematically advocate for quotas, but encourages its clients to set targets and objectives. EBRD usually sets targets: however, in one specific project, EBRD used an EU directive to provide a rational and encourage the client to have 40% of women in their board in the next 4 years.	
Quota /positive discrimination <i>Comment during consultation meeting</i>	EBRD could promote obligatory quota in women decision-making places	Croatia Employers Association London	See response above	
Quota /positive discrimination <i>Comment during consultation meeting</i>	Proposes quotas within development strategies for training	CGEM Morocco	See response above	
<i>Comment during consultation meeting</i>	My question is about political rights indicators: practices often differ from legislation. I have noticed that there are no indicators. Which new indicators as part of the Bank's Gender Gaps assessment that looks at women's	Ukraine	Indicators can be found in Annex 2 of the Gender Strategy where the Gender Gaps methodology is explained.	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
	political rights. Will EBRD introduce indicators to monitor the strengthening of women's political rights in this area?			
Reproductive health <i>Comment during consultation meeting</i>	EBRD draft Gender Strategy seems not to take into considerations the fact that in many legislative frameworks reproductive health assistance or sexual abuses are not taken into consideration.	Association ESPOD Morocco	Reproductive rights are not part of EBRD's mandate. Other partners are more knowledgeable and active in this domain.	
Sexual harassment <i>Comment during consultation meeting</i>	Harassment in the public space is a factor hindering the access of women to any form of professional life. EBRD draft Gender Strategy should take this aspect into consideration	UN Women Morocco	EBRD works in some projects to address harassment in urban transport projects by promoting safe transport for all. This is also addressed through the equal opportunity projects where the Bank promotes policies and practices to prevent and fight harassment in the work place.	
Sexual harassment <i>Comment during consultation meeting</i>	In EBRD draft Gender Strategy there is no mentioning of law against sexual harassment	Amnesty International London	In the context of Equal Opportunities projects and as part of our clients' compliance with EBRD Environmental and Social Policy, our investments are to comply with national legislation and international commitment against sexual harassment.	
Resettlement	Resettlement initiatives, in infrastructure and industrial development projects, should be gender sensitive.	Agence Française du Développement (AFD) Morocco	Gender issues are addressed throughout the Policy Requirements of the EBRD Environmental and Social Policy, including regarding resettlement.	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
CSOs / civil society engagement <i>Comment during consultation meeting</i>	Is EBRD going to engage CSOs in the Strategy implementation?	Albania	In Section 2.6 “Partnerships”, the strategy commits the Bank to, as appropriate, engage with civil society organisations which support and promote gender equality, in particular women business associations and associations promoting different aspects of women’s economic empowerment. It will continue to interact and develop partnerships with institutions engaged in knowledge management for gender equality.	Addressed in Section 2.5 “Technical Cooperation and Donor funding” and 2.6 “Partnership”
CSOs / civil society engagement <i>Written comment</i>	Strategy could possibly call for more inclusive involvement of local actors, clients and women’s human rights defenders.	OHCHR	See response above	Addressed in Section 2.5 “Technical Cooperation and Donor funding” and 2.6 “Partnership”
Stakeholders engagement <i>Comment during consultation meeting</i>	To better implement the Gender Strategy, there is a need for practical collaboration among different stakeholders.	Chair Professor at Tbilisi State University and Head of South Caucuses Women’s Forum working on policy papers for EBRD and the WB including on the gender equality strategy of EBRD	In project design and implementation EBRD uses the Environmental and Social Policy, which incorporates a performance requirement for stakeholder engagement. Accordingly, women have to be consulted and have their say in project design. In some countries (e.g. in Central Asia and the Caucuses) women have become members of water committees where they have increasing roles in decision making.	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
		Turkey (Istanbul)		
Executive Summary <i>Written comment</i>	The Executive Summary could point to key achievements under the SGI to provide a better sense of program continuity.	World Bank	SGI achievements are reflected in Annex 1.	See Annex 1.
General comment <i>Written comment</i>	To ensure effective implementation of the Gender Strategy, it should be comprehensive, but also clear and concise. It should be anchored in economic theory, and set out clear proposed actions with measurable targets and indicators, referring methodological material in appendix.	Ministry of Finance Sweden	The Performance Monitoring Framework – which is indicative in the Strategy – has benefitted from a further re-draft to take on board comments received, whilst remaining consistent with the Bank’s Results Matrix. It contains illustrative targets and indicators. It has been assessed for “evaluability” by the Bank’s Evaluation Department. Additionally, the document draws on Bank lessons learned in operationalising the SGI (2013) and broader peer-reviewed research. The economic case for gender equality is considered in Section 1.1.	Addressed in Section 1.1 “Considering the Case for Equality of Economic Opportunity” and 3 “Results and evaluation”
Progress on SGI <i>Comment during consultation meeting</i>	We need to hear what happened after the SGI and how things moved forward.	Shevolution Consultancy London	Annex 1 of the Gender Strategy presents progress achieved under the SGI.	A summary of progress on the SGI can be found in Annex 1. Concept related to measuring the Transition Impact are described in Section 2.2.1 “Transition Impact”

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Issue	Comment	Contributor	Management Response	Reference Revised Version
Data <i>Written comment</i>	For inheritance, the 2009 data was used instead of the 2014 data. It would be better to use the latter, especially in terms of country coverage, accuracy and comparability	SIGI-OECD	The OECD-SIGI, 2009 was used to populate the Gender Gaps study and the Gender Strategy reflected this fact.	
Data <i>Written comment</i>	It is important to be aware of what data sources were used by EBRD to identify gender gaps e.g. access to water, since this affect disproportionately boys and girls, the nature of needed services like transportation. Equal opportunities for women and empowerment need both quantitative and qualitative data and information. Reliable data should also inform priority setting which is not evident from the draft Gender Strategy. This may hinder EBRD from addressing pressing issues in a given country.	UNDP Ministry of Social Development National Centre for Human Rights Jordan	EBRD does not generally have the resources for new studies or data collection and therefore uses studies and data provided by others, i.e. all reputable sources, which are referenced throughout the document. The Gender Strategy aligns with the EBRDs transition mandate and as such most data relates specifically in most instances to the EBRDs Transition Gender Gaps, these in turn have guided the Bank on a prioritisation for its engagement. The Bank also hopes that these consultation meetings on the draft Strategy will result in the setting up of a network that will provide outreach to the broadest possible information and data.	
Data / Gaps methodology <i>Comment during consultation meeting</i>	By putting together laws and social norms in the gender gaps methodology it is impossible to differentiate between law and enforcement of law which is an important differentiation in many countries when it comes to gender legislation and practice but even more in the case of Turkey.	SIDA Turkey (Ankara)	The Gaps methodology is revised annually. This issue will be communicated to the department in the Bank responsible for calculating the gaps.	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
Data <i>Written comments</i>	EBRD's CoOs could liaise with local NGOs who are promoting economic and socio-political inclusion of women in formal and informal sectors, to obtain stronger empirical evidence of the relationship of cause and effect between economic growth and gender equality	UN Habitat	In Section 2.6 "Partnerships", the strategy commits the Bank to, as appropriate, engage with civil society organisations which support and promote gender equality, in particular women business associations (and associations promoting economic empowerment.	Addressed in Section 2.5 "Technical Cooperation and Donor funding" and 2.6 "Partnership"
Data <i>Written comments</i>	To better develop meaningful data, EBRD could work closer with national statistical offices in CoOs.	UNDP New York	EBRD will do this during the implementation of the Gender Strategy.	
Data <i>Written comments</i>	Selectivity: Given EBRD's diverse CoOs, the Strategy's implementability is likely to largely depend on being selective. To that end, Annex 2 provides some impressive analysis and country mapping on which country engagements can further built. While indicators around access to finance, access to employment and skills, and access to services are significantly elaborated on, it might be useful to further explore the topics of gender-based violence, fragility and climate. These dimensions are mentioned at the outset of the document, but do not feature throughout the document. This might particularly be helpful, in light of refugee crisis, migration and trafficking affecting the region.	World Bank	The Strategy attempts to provide sufficient flexibility for the Bank to be able to respond to future changes in the relative position of women and men in their respective societies as well as to new issues related to gender equality as these emerge in order to be able to respond to new issues. The internal operational plan (2016-2017) will also determine more in details the work to be done if new issues are arising.	Addressed in Executive Summary

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Issue	Comment	Contributor	Management Response	Reference Revised Version
Data / causality <i>Written comment</i>	EBRD should be more aware of the causality relationship between gender equality in specific domains (i.e. education) and equitable and sustainable economic growth.	UN Habitat	The economic case for gender equality is considered in Section 1.1. Though women's empowerment and economic development are interrelated, however, there is no simple cause-effect relationship at work – and the document has been careful not to overstate the commensurability of economic theory and gender equality.	
Data / causality <i>Written comment</i>	EBRD should better look to cause-effect relationship. By looking at indicators such as equality of access to economic opportunities without looking at what are the reasons behind this, EBRD could miss the cause-effect relationship of the discriminations. The education statistics prove the point that just equality of access on its own will not lead to sustainable addressing of issues. Maybe it would be better to state more explicitly that there are variations in the ways that access to employment and skills are affecting men and women. For example, reduction of state employment has meant that women are facing higher unemployment than men.	Social and economic development consultant	While looking at the enablers for women's employment the strategy looks at the cause of discriminations. While our approach is mainly related to access and control to assets, some of the interventions can address also the cause of discriminations (i.e. Study on legal barriers for the Kyrgyz Republic) see Case study 1.	Addressed in Section "Operational performance and delivery" and in Case Study 1.
Data / causality <i>Comment during consultation meeting</i>	Table on page 8 only justifies actions by economical results, although social aspects should be taken into account (health, literacy, etc.) towards sustainable development.	Coopérative TIRST Morocco	EBRD acknowledges importance of health and education of women, but we do not work in these sectors.	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
Exchange of good practices <i>Comment during consultation meeting</i>	How to promote a more pro-active approach for companies, so they understand it is in their interest and economic advantage to integrate gender equality? Maybe through discussing best practices and sharing experience, promoting and disseminating them.	GIZ Morocco	EBRD promotes equal opportunity through its projects. The gender team disseminates good practices and lessons learned. The Gender Video developed by the Gender Team (available on the website) is also a tool used with clients, as well as our different brochures and knowledge products to showcase the business case of investing in a diverse workforce.	
Exchange of good practices <i>Comment during consultation meeting</i>	South-South cooperation, with exchange of best practices and networking is important.	RARBA-TIZNIT Morocco	As part of the support to clients in the area of gender, the Bank has organised field trips, study visits, and exchanges of experiences between peers in different industries.	
Structure of the document <i>Written comment</i>	Section 1.3 on the Bank experience, a footnote on SGI, on the inclusion methodology and on the gender transition gap is needed. The information is already there in Annex 1 and section 2.2.1 para. 2 and annex 2, but bringing it forward will make the text and context more clearly to the reader. Section 2.2.1 starting from para 2 onward until the end of section 2.2.1 can be used to beef up the section on bank experiences and lessons learnt.	UN Women	The structure of the document has been changed.	

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<p>Objectives</p> <p><i>Written comments</i></p>	<p>In the draft of the Strategy is unclear if Gender Equality is an objective or merely a tool. For example, in its Executive Summary the draft of the Strategy reduces gender equality to “<i>a principal element in the promotion of sound business management and critical to the advancement of sustainable transition in the countries where the EBRD invests.</i>”</p> <p>Then the draft introduces the concept of Gender Equality of Economic Opportunity, again stressing on its instrumentalisation for achieving a well-functioning market economy.</p> <p>The EBRD Strategy for the Promotion of Gender Equality should explicitly list among its Objectives the following one: “<i>The EBRD will promote gender equality, both internally and through its investments and policy dialogue, by providing conditions for women and men for realising their full human rights and for contributing to, and benefiting from economic, social, cultural and political development.</i>”</p> <p>As already pointed above, the draft of the Strategy lacks clear identification and consistency on the Strategy's objectives. Chances are that even the</p>	<p>CEE Bankwatch Network</p>	<p>Gender equality is a complex goal and requires thinking and effort across a range of domains. The term is defined in detail in the glossary. The definition is broadly in line with previous Bank statements, such as in the SGI. It is also consistent with the Sustainable Development Goals, IFI best practices, etc. However, the transition mandate of the Bank does not allow us to routinely prioritise activities across all of these domains. Accordingly, the strategy clarifies what the EBRD can be expected to ‘do’ about gender equality according to its mandate and approach. At a high level, this is described in the vision of gender equality as a principal element in the promotion of sound business management and critical to the advancement of sustainable transition in the countries where the EBRD invests (Executive Summary). It is clarified further as an operational focus, in terms of committing EBRD to ‘the promotion of equality of economic opportunity’ – reflecting the specific domain where EBRD has mandate and expertise to work. The phrase ‘the promotion of equality of economic opportunity’ is shortened in descriptions of particular operational approaches to ‘equality of opportunity’ and, at times, shortened further still as ‘Equal Opportunity’. ‘Promotion of equality of economic opportunity’, ‘equality of opportunity’ and ‘equal opportunity’ should, in a Gender Strategy, be considered short-hand</p>	

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	<p>most elaborate strategy will fall short of achieving its aspirations, if it lacks clearly defined objectives.</p> <p>Additionally to listing Gender Equality as a stand-alone strategic objective, the Strategy should present its Objectives clearly and consistently, both in the Executive Summary and throughout the Strategy</p>		<p>ways of saying ‘supporting equal access to economic opportunity among women and men’. Equity is used in the document to refer to qualitative fairness in access to power and resources, and is considered part of the process towards achieving gender equality.</p>	
<p>Engaging men</p> <p><i>Written comments</i></p>	<p>Figure 1 mentions “Engaging Men for Gender Equality” under the Global Gender Themes but there is no real development of this topic in the draft Strategy. Is this something that is being planned for a future stage? If so that should be mentioned. Certainly from experience in the field, without addressing men in some way, no gender initiative is likely to be sustainable. Male youth can be one of the key challenges in managing mitigations. In the mining sector, male youths can be one of the most vulnerable groups.</p>	<p>Social and economic development consultant</p>	<p>The strategy aims to respond to inequalities based on gender, and in the situation where male face inequalities based on their gender (in situations where it is relevant for EBRD operational approach). The EBRD approach is to make sure men are targeted as: i) policy makers, decision makers, CEO and business leaders (awareness raising) ; ii) men in communities or companies; iii) inequalities faced by men (i.e. the fact men can engage in high-risk, negative and violent practices) (see glossary)</p> <p>EBRD will try to address stereotypical views or perceptions of men and women’s roles, and the relations between them through the projects. In addition working around the provision of equality in work-life balance can contribute to facilitating a greater share of the burden of care within the household, which will be key to achieving women’s enhanced</p>	<p>Addressed in Section 1.4 “The Bank’s Experience & Lessons Learned”</p> <p>Addressed in Section 2.2 “Strategic Fit”</p>

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Issue	Comment	Contributor	Management Response	Reference Revised Version
			economic activity.	
Engaging men <i>Written comments</i>	How might men be engaged in this Strategy? Certainly there might be entry points in the Policy Dialogue work, for instance.	US Treasury	See response above	
Engaging men <i>Written comments</i>	How men will be engaged in this Strategy?	US State Department	See response above	
Engaging men <i>Written comments</i>	To promote gender equality, the experiences and rights of both, women and men, girls and boys need to be considered and addressed. Some gender norms and policies negatively affect boys and men in specific countries and sectors. In addition, engaging men as key change agents is crucial to success. The important role of men in addressing gender equality should come out very clearly in the Strategy.	Ministry of Finance Sweden	See response above	
Engaging men <i>Comment during consultation meeting</i>	The Gender Strategy should consider to plan actions focused on educating men on gender equality	FYR Macedonia	See comments above	
Engaging men	Does EBRD work towards enabling men as well to benefit from child and elderly	Turkey	See response above	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
<i>Comment during consultation meeting</i>	care provisions and other interventions?	(Istanbul)		
Engaging men and boys <i>Comment during consultation meeting</i>	One of the priorities of SIDA's 2014-2020 Strategy is participation of boys and men in development. How does the strategy plan to address this issue?	The Swedish Development Agency (SIDA) Turkey (Ankara)	See response above	
Engaging men <i>Written comments</i>	Are men included in EBRD policy implementation?	Social and economic development consultant	See response above	
Engaging men <i>Comment during consultation meeting</i>	It is very good idea to involve men into gender equality implementation process. But it should be more developed in the strategy. One of the ways to involve men is via reproductive labour sharing practices that is very rarely done in Ukraine. Another example could include involving men into traditionally more "female" types of work and activities. Male community and company leaders should talk more on value of gender equality and on prevention of gender discrimination; good practices include peer-to-peer knowledge sharing and	PhD in Sociology, National University of Kyiv-Mohyla Academy, gender expert Ukraine	See response above	

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	education (when men are talking to other men about how men could contribute from gender equality implementation). This could be done via company trainings etc. Particular stress should be put on prevention of sexual harassment and gender-related stereotypes of women's and men's roles.			
Stakeholder engagement plan <i>Comment during consultation meeting</i>	From the Gender Strategy document we have the idea that some of the beneficiaries will be consulted throughout the implementation cycle of EBRD projects: can you explain more broadly? How EBRD will involve actual beneficiaries in design and implementation of projects?	Amnesty International London	Beneficiaries' participation and stakeholder engagement, including women, is included, as part of Stakeholder engagement plans in all EBRD investments according to the EBRD Environmental and Social Policy.	Stakeholder engagement has been mentioned in section 2.4.2 "Access to Employment & Skills"
Stakeholder engagement plan <i>Comment during consultation meeting</i>	What are EBRD plans for mechanisms of citizen's engagement and consultation?	Mott MacDonald London	See response above	Stakeholder engagement has been mentioned in Section 2.4.2 "Access to Employment & Skills"
Stakeholder engagement plan <i>Written comments</i>	Process: we hope that the strategy process, as well as the Gender Strategy itself, will serve to further strengthen the gender equality work in the Bank with the purpose of contributing to gender equality in the CoOs and to an enabling environment for transition. It is	Ministry of Finance Sweden	The preparation of the Strategy has involved extensive internal engagement – with a Working Group encompassing 9 key departments from most Vice Presidencies. It also benefits from Senior Management support and advice. Progress will be tracked via the Institutional Quarterly Progress Report and	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
	important that all stakeholders feel strong ownership of the Gender Strategy and are involved in the process. The results of the implementation of the Strategy should be reported regularly as part of the Bank's Quarterly Performance reports and in the country strategy context. Based on experiences and lessons learned, the Gender Strategy should be evaluated in 2021		evaluation will take place in 2021. The internal operational plan will also revise what is working and what needs further enhancement.	
Implementation <i>Written comments</i>	EBRD should be more explicit on how it aims to achieve the strategy objectives	Twitter	An internal operational plan will be developed to make sure the objectives are translated into clear outcomes, targets and indicators. This will also allow some flexibility to include the new issues.	
Implementation <i>Comment during consultation meeting</i>	Gender equality does not work in a vacuum and spread out in other inter-sector economies: how this will be taken on board when projects are redesigned, and how it will be operationalized?	Amnesty International London	Gender equality is influenced by culture, social norms, legislative frameworks, etc. EBRD tailors each project based on its specific context and what is culturally appropriate but also what could be achieved and how. In the dialogue and partnership between EBRD and its clients, it is discussed how to promote participation and ownership and what vision to adopt in the implementation of the project.	Complexity and diversity of different contexts is addressed in Section 2.2.1 "Transition Impact"
Implementation <i>Comment during consultation</i>	What implementation tools is EBRD going to use? The tools mentioned in the Strategy are very broad to be translated into action.	Activist Jordan	The EBRD will implement the promotion of gender equality through investment, technical cooperation and policy dialogue. These will focus predominantly on a "bottom up" approach starting with the investment. This is	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
<i>meeting</i>			the traditional approach at the EBRD, which has shown success to date.	
Implementation <i>Comment during consultation meeting</i>	How will the Strategy be translated into concrete actions? The theory and lessons learnt from the previous strategy will be now turned into practice?	Turkey (Istanbul)	See response above	
Implementation <i>Written comments</i>	We are very interested in EBRD Gender Strategy and pleased with the work in this area. SIDA believes that support towards gender concerns should be mainstreamed and not ring-fenced in specific funds.	SIDA	There are wider on-going discussions within the Bank about how certain activities and commitments will be resourced.	
Implementation <i>Written comments</i>	Has EBRD enough resources to implement the Gender Strategy? It shouldn't rely on trust funds/similar but gender should be properly resourced within the Bank's operating budget	US Treasury	See response above	
Implementation <i>Written comments</i>	Achievement of results of Gender Strategy is important for Central Asia countries. What is the mechanism for realization of the Gender Strategy? In Tajikistan for instance the Investment Council in charge of SMEs could include thematic working groups (WGs). Include organization that works with starting enterprises and SMEs. WGs should be used for public monitoring for	Investment Council Tajikistan	In order to avoid duplication of efforts and to deliver the project results most effectively, the EBRD often collaborates with other national and international institutions. With regards to the specific comment on the Investment Council of Tajikistan, since 2014 the EBRD has been engaged with the Government of Tajikistan and women entrepreneurs' associations in a process of advocacy and dialogue to identify the needs of women	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
	strategy implementation. WGs should have action plan and the budget for its work. It will also allow avoiding duplication of activities of other banks. There is a need to adapt existing regulations and develop an action plan to raise financial support.		entrepreneurs and discuss initiatives to support them. As a result of this, a Taskforce to support women entrepreneurs, operating under the Investment Council, has been established.	
Implementation <i>Comment during consultation meeting</i>	How will you disseminate best practices/role modelling/networking at a regional level?	UNDP Jordan	Most of our assignments will conclude with a knowledge product for internal and public dissemination. The EBRD frequently organises events in the region including its own Annual Meeting, which are opportunities to discuss key or emerging topics.	
Implementation <i>Comment during consultation meeting</i>	How are good practices disseminated?	Tajikistan	See response above	
Implementation <i>Written comments</i>	As part of implementing the Strategy, a section on roles and responsibilities could be added for accountability on purpose (who is the custodian of the Strategy? What is the role of the different departments? Who will report on its implementation?). The Strategy could have a section as part of implementing the Strategy on human and financial resources available or to be mobilized for implementing it.	UN Women	The Bank aims to mainstream gender equality into EBRD operations by 2020. The Gender Team will coordinate the implementation of the Strategy. However, different departments of the Bank, in their different capacities will deliver the EBRD's action on gender. The Gender Team will be responsible for capacity building in an initial stage so that such departments can undertake their respective roles in the implementation of the Strategy. Priority will be given to those directly involved	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
			in Bank operations (i.e. banking departments).	
Monitoring <i>Written comments</i>	EBRD has a great potential to achieve gender equality if its project activities are monitored and evaluated effectively also at CoOs level.	UN Habitat	Assessing Bank progress toward the objectives of this Strategy will require on-going monitoring and evaluation of operational parameters as well as the policy and institutional development aspects of the Bank's mandate and operations. Appropriate parameters have been indicated for tracking progress.	
Monitoring <i>Written comments</i>	What outcomes (related to the Gender Strategy) EBRD is going to measure? How?	US State Department	Refer to results framework for specific outcome indicators	
Monitoring <i>Written comments</i>	How EBRD would measure progress? The performance monitoring framework could be strengthened with the inclusion of specific indicators, baselines, and targets to measure progress. We would support the inclusion of a gender benchmark in the Bank's corporate scorecard	US Treasury	See response above	Addressed in Section 3 "Results and Evaluation"
Monitoring <i>Written comments</i>	EBRD should strengthen the system to monitor the implementation of the Strategy. EU in their Gender Action Plan adopts a system by which each department choses 3 gender indicators (from a list provided by the strategy) and they commit to work towards those and report on them as part of EU results	EU DEVCO	See response above	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
	framework reporting system.			
Monitoring <i>Written comments</i>	One area that the Strategy in its current format does not convey very clearly is “What does Success Look Like?” While the introduction mentions the move towards a results based strategy, such approach could be better reflected in the performance and results measurement section. For example, the Strategy may want to expand on what it means for the Bank to have “committed to mainstream gender equality into EBRD operations by 2020”. Is it that every project needs to include a gender dimension (Figure 3)? The team may want to consider including both quantitative and qualitative targets. In addition, since the Strategy proposes that gender results matrix will be used to track results at the project level, it would be good to show the format and examples of the matrices. The Strategy references an “inclusion methodology” throughout. Might it be useful to include it in an Annex?	World Bank	See response above	
Monitoring <i>Written comments</i>	EBRD should think to include a requirement to assess and consider the often different impact of all EBRD projects on women and men, as well as full inclusion in project design, monitoring and evaluation of both women and men (internal and external	OHCHR	Under the EBRD Environmental and Social Policy all projects are screened to identify disproportionate gender impacts and establish mitigation measures.	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
	with clients).			
Monitoring <i>Comment during consultation meeting</i>	What monitoring tools EBRD is thinking to adopt?	UNDP Jordan	EBRD tracks performance on gender through its country strategies, where specific themes integrate gender. There are 3 levels of tracking: i) corporate level (integration of indicators); ii) second reporting through country strategies and iii) third level (final indicators expressed in a result matrix that team will use).	Addressed in Section 3.2 “The Performance Monitoring Framework”
Monitoring <i>Comment during consultation meeting</i>	How does EBRD measure the impact of its activities and interventions, apart from calculating the number of women? Are there measurement standards or methodology?	Morocco	See response above	
Monitoring <i>Comment during consultation meeting</i>	Can you elaborate on the result framework? How does EBRD intent to measure its impact related to gender equality?	Kirsten Newitt, Ergon Associates London	See response above	
Monitoring <i>Comment during consultation meeting</i>	EBRD will track progress with country strategies: in relation to gender equality will EBRD stick to priority countries?	CEE Bankwatch Network London	EBRD will be guided by where the gender gaps are larger but will also invest in countries with smaller gaps, especially when the intervention can have a catalytic or demonstration effect.	

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Monitoring Written comments	<p>The Performance Monitoring Framework (page 36) presents an opportunity to align outcome indicators with those soon to be released under the recently adopted 2030 Agenda for Sustainable Development (SDGs). For example, Objective 1.1 “<i>increased access to employment opportunities for women</i>”; outcome indicators could include sex-disaggregated data on closing labour force participation rates and gender wage gaps. This would then resonate with targets under Goal 8 of the SDGs “<i>Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all</i>”.</p> <p>In terms of creating an enabling environment for women’s entrepreneurship, EBRD might also like to integrate a reporting requirement into loan agreements whereby borrowers report on the percentage of funds used to procure goods and services from companies owned by women.</p>	UN Women	EBRD will strive to collect as much sex-disaggregated information as possible as part of its investment while ensuring that clients are not overburdened by data and reporting requirements of our investments.	
Monitoring Written comment	The performance monitoring framework could set quantitative targets and a time frame.	UN Women	This will be further developed as part of the internal operational plan following the approval of the Strategy.	

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<p>Monitoring</p> <p><i>Written comment</i></p>	<p>The point that the Strategy is not about gender safeguards, but about gender opportunities, was made loud and clear during the Strategy consultations. The Environmental and Social Policy (ESP) is expected to do the gender safeguarding, in spite of the fact that its focus on gender is marginal or selective at best.</p> <p>The draft of the Strategy lacks assessment of the EBRD's experience in safeguarding gender rights, as neither the 1.3. Lessons Learned nor the 2.3.2. Gender Approach within the EBRD Investment Project Cycle sections discuss at any meaningful length the EBRD's experience with gender impact assessment, gender mitigation measures and the incorporation of gender in ESAPs and SEPs. This creates the impression that this experience either does not exist or it does not matter, and as a result, the draft of the Strategy lacks justification for choosing to promote women while refusing to protect them.</p> <p>The interface between the Strategy and the ESP should be defined clearly and justified. The Strategy should provide information on the experience to date with gender impact assessment, gender mitigation measures and the</p>	<p>CEE Bankwatch Network</p>	<p>At the moment the Bank is not planning to have a specific gender safeguard or Performance Requirements (PR), but gender has been integrated in all PRs as part of the Environmental and Social Policy 2014.</p>	<p>Addressed in Section 1.4 “The Bank’s Experiences & Lessons Learned”</p>

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Issue	Comment	Contributor	Management Response	Reference Revised Version
	incorporation of gender in ESAPs and SEPs.			
Monitoring <i>Written comment</i>	<p>The main weakness of the gender strategies in many IFIs that has been pointed out by stakeholders is the lack of enforcement and accountability with regards to separate investments. This draft Gender Strategy of the EBRD also lacks clear understanding how the evaluation and mitigation of the gender impacts of projects will be addressed.</p> <p>One of the recommendations during the revision of the ESP in 2014 was that the EBRD should develop a Performance Requirement on Gender as soon as possible and strengthen its clause on gender in line with its shareholders' human rights obligations. Our experience shows that current safeguards are biased towards corporate governance, but lacking 'teeth' for safeguard communities and women impacted negatively by projects, because it is easier to agree with a client an Equal Opportunity policy than to resolve problems with communities caused by adverse project impacts.</p> <p>The SGI evaluation has to include the assessment of the adequacy of safeguards and the need to include in the</p>	CEE Bankwatch Network/National Ecological Centre of Ukraine Ukraine	The Bank screens all projects for the identification of potential adverse impacts on gender and to identify gender mitigation measures together with potential gender entry points. The Bank's 2014 Environmental and Social Policy, has gender comprehensively mainstreamed throughout its text including its Performance Requirements as relevant.	

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	<p>strategy a focus on preventing adverse gender impacts from projects on the communities.</p> <p>EBRD Should include in the future revision of the ESP a Performance Requirements on gender.</p>			
<p>Domain of intervention</p> <p><i>Written comments</i></p>	<p>The Strategy's focus on access to finance, employment and skills and services, may underestimate the importance of asset development (of various types); informal sector employment; non-waged livelihood strategies; and women's resource and tenure rights (e.g., to non-timber forest products; or other common property). Overall there is a gap in the Strategy regarding consideration of natural capital and physical/ environmental assets that would be of particular importance to rural women. It is not clear to this reader, how much of this 'oversight' is due to the specificities of EBRD's operating environment, and/or the sector focus of the portfolio (as the latter in particular was not fully outlined in the Strategy).</p>	World Bank	The mentioned 'oversight' is indeed due to the specificities of EBRD's operating environment, and at the same time of the sectors to be included in the pipeline.	
Women in leadership positions	Voice and agency: while directly and indirectly referred to within the document, did not appear to be a strong focus of the Strategy, despite, e.g., one	World Bank	EBRD aims to include user associations (i.e. Morocco), and more broadly women's groups, whenever is relevant and pertinent to promote women's voice, agency and participation at the	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
<i>Written comments</i>	of EBRD's organizational goals including political development aspects around democracy. Women's leadership development may be another related area that could be highlighted here. Models such as User Associations (e.g., for water services) are another potential entry point for, voice/ agency and sustainability concerns.		local level.	
Women in leadership positions <i>Comment during consultation meeting</i>	EBRD Gender Strategy could better emphasize some support to women in leadership positions	Turkey (Ankara)	Supporting female leaders and decision-makers is emphasised in the Gender Strategy, particularly at the corporate level.	Addressed in Section 2.4.2 "Access to Employment and Skills"
Women in leadership positions <i>Comment during consultation meeting</i>	EBRD could do more to support women in leadership positions	Ministry of Family and Social Policies Turkey (Ankara)	See response above	
Women in leadership positions <i>Comment during consultation meeting</i>	It is necessary to work on the political level. High level women in parliament will not guarantee the gender equality.	Tajikistan	See response above	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
Women in leadership positions <i>Comment during consultation meeting</i>	EBRD should support the increase of proportion of women in Parliament/decision-making institutions	Armenia	See response above	
Women in leadership positions <i>Comment during consultation meeting</i>	Women's Access to decision making is key	UN Women Morocco	See response above	
Women's voice <i>Written comments</i>	Women's and girls' participation is needed in all decision-making bodies at all levels during a project's cycle to make their voices heard. Action is needed to eliminate discriminatory legislation and prejudices, to remove de facto barriers for women's participation and to raise awareness amongst decision-makers, project developers and the population as well as to empower women.	Women in Europe for a Common Future (WECE)	EBRD undertakes gender responsive stakeholder engagement in the context of its investments according to its Environmental and Social Policy. The Bank also undertakes policy dialogue to address barriers to women's participation in the economy and more broadly society, in areas that fall within the Bank's mandate.	
Urban / rural Agriculture	The Strategy makes reference to the climate funds, but could be more explicit about different roles and needs of men and women in disaster/risk mitigation and fragility. Similarly,	World Bank	These issues will be further articulated during the implementation of the strategy. The Bank will seek to collaborate with other IFIs with a longer experience in these areas.	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
supply chain <i>Written comments</i>	since the Strategy acknowledges urban/rural gender gaps, it may want to expand where the focus of the Strategy might lie when it comes to closing gaps between men and women. Given the potential of creating better and more jobs for women in agriculture supply chains in EBRD's CoOs (both as employees, entrepreneurs and self-employed), the Strategy may want to explore a more targeted agriculture supply chains and productivity gains approach.			
Agriculture <i>Comment during consultation meeting</i>	The agricultural sector is very important for women, especially in some countries like Armenia. This should be mainstreamed into the sections on finance and employment	Armenia	EBRD will do this during the Strategy period through its work in supply chains.	Addressed in section 2.4.1 "Access to finance including support of entrepreneurship" and 2.4.2 "Operational approach"
Renewable energy <i>Written comments</i>	Page 33. The reference to the Climate Investment Funds (CIF) is appreciated. The reference may wish to note EBRD work on e.g., energy efficiency and renewable energy, through the CIF.	World Bank	The Strategy refers to the work of the Bank in energy efficiency in respect to the operational approaches and the work on access to finance and access to services.	
Country specific actions <i>Comment during</i>	EBRD Strategy should have implementation action plans, which rest on the country's specificities. The plans should focus on practical interventions to which participants of this meeting can	National Committee For Family Affairs Ministry of	This is a Gender Strategy for all EBRD countries of operation, which are very diverse, but these will be identified and made available at country level through the EBRDs Country Strategies. The Bank's operational approach to	

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<i>consultation meeting</i>	provide feedback.	Social Development Jordan	gender is being incorporated into the country strategies alongside other operational priorities.	
Country specific actions <i>Comment during consultation meeting</i>	The Gender Strategy should customize its interventions to each country situation	Turkey (Ankara)	See response above	
Country specific actions <i>Comment during consultation meeting</i>	As we can see the Strategy is rather general: are there any plans to adapt it on the national level in each country? Is there any finance budgeted for this aim?	Tajikistan	See response above	
Country specific actions <i>Comment during consultation meeting</i>	The Strategy should be based on the needs and peculiarities of each country. E.g. Georgia: Support to women in exporting agribusiness in rural areas as stakeholders. This support should go beyond just financial support, but also empower women.	Tbilisi State University and Head of South Caucuses Women's Forum working on policy papers for EBRD and the WB including on the gender equality	See response above The strategy includes promoting women's participation in the supply chain.	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
		strategy of EBRD Turkey (Istanbul)		
Country specific actions <i>Comment during consultation meeting</i>	The draft Gender Strategy seems too centralist. Perhaps it could be decentralised and more specific to country contexts.	The Turkish Employment Agency Turkey (Ankara)	See response above	
Country specific actions <i>Comment during consultation meeting</i>	Is EBRD diversifying the actions in its Strategy based on specific country contexts or will there be global actions with all CoOs and then specific actions will be taken only according to some of their specific needs?	Development Workshop Cooperative Turkey (Ankara)	See response above	
Country specific actions <i>Comment during consultation meeting</i>	It is important to take the specific needs of the countries into account. Women's enterprises come in different categories and accordingly have different needs.	Ministry of Family and Social Policies Turkey (Ankara)	See response above	
Country specific actions	The Bank needs to clarify how evidence gathered from previous efforts feed into	Ministry of Finance	See response above	

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<i>Written comments</i>	the country approaches. Country level results should be tracked in the Country Strategy result framework.	Sweden		
Country specific actions <i>Written comments</i>	<p>It is clearly understood that the regions where the Bank is currently operating are diverse and “one size does not fit all”. However, we consider de-prioritising of some the countries discriminative and it might represent as well lost opportunities for promotion of gender equality. Although gender gaps in some countries may appear smaller than in others, these gaps are not static. For example, and in the case of Ukraine they are widening.</p> <p>The Bank’s CoOs should have a differentiated approach in the Strategy and all new country strategies should be developed to track gender equality results.</p>	CEE Bankwatch Network/National Ecological Centre of Ukraine Ukraine	See response above	
Country specific actions <i>Comment during consultation meeting</i>	It would be appropriate for EBRD to have separate strategies for countries based on their regional political developments and socio-cultural, economic situation. For example, Eastern Europe and other Post-Socialist countries could be in one region or cluster. Sometimes it seems from the Strategy that more attention is paid to	Student at National University of Kyiv-Mohyla Academy Ukraine	See response above	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
	those countries that face more gender-based problems (according to Global Gender Gap Report ¹). But in this situation other regions could be ignored. I think that strategy should be diversified and more local / regional based.			
Country specific actions <i>Comment during consultation meeting</i>	Is EBRD planning to stay involved in more advance regions like South East Europe? Not all countries are performing well in terms of gender gaps. How do you decide on focus?	Institute for Social responsibility Slovenia	See response above	
Country specific actions <i>Written comments</i>	Page 9 : It should be spelled out what the ‘target regions’ are for EBRD’s gender work (e.g., is it Central Asia, SEMED and Turkey, where gender gaps were identified as especially pronounced; or are there other regional groupings of interest?)	World Bank	Central Asia, SEMED and Turkey remain the countries where the gaps are larger are will be the ‘target regions’ but investments with a gender focus or component may be undertaken in countries with smaller gaps, especially when they can have a catalytic or demonstrating effect.	Addressed in Section 2. The “Strategy for the promotion of Gender Equality” and 2.2.1.1 “Geographic Considerations”
Gender analysis <i>Written comments</i>	In my view, it is impossible to carry out a gender analysis without placing it within the context of a social analysis. Given this, it would be useful to reconsider Figure 3 (a very useful	Individual Social and economic development	EBRD takes into account social dimensions (in terms of indicators and data on poverty, ethnicity, etc.) when conducting gender analysis in the context of its investments.	

¹ <http://www.weforum.org/reports/global-gender-gap-report-2014>

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	diagram) to include social analysis. For example at the Concept Review Stage, should it not be that all CRMs are reviewed by the CSE and the Social Team and discussed and referred to Gender Team etc?	consultant		
Mainstreaming and corporate scorecard <i>Written comments</i>	In addition to targeted initiatives in some focus countries, the Gender Strategy should ensure that gender equality is integrated throughout the EBRD's operations. An indicator to track the implementation of the Gender Strategy should therefore be included in the corporate scorecard to ensure that there are institution-wide incentives for gender mainstreaming. Reducing gender-based inequalities promotes economic opportunities for women. This is an important part of a well-functioning market economy. Therefore, gender equality should be fully embedded in the Bank's transition concept in its own right and not under the economic inclusion heading.	Ministry of Finance Sweden	The Executive Committee is considering tracking Gender Equality to be tracked under the Corporate Scorecard. The Bank considers gender equality as a transition concept and is therefore assessed throughout the "seven pillars" of Transition Impact. The methodology that the Bank uses to calculate the transition gaps has been labelled "inclusion methodology" for ease of reference.	
Sustainability <i>Comment during consultation meeting</i>	EBRD, like other lending and development organisations should ensure sustainability of their projects. EBRD Gender Strategy needs to cover the issue of sustainability ("what happens after?").	Millennium Challenge Activist	Sustainability is a priority for the EBRD. The Bank closely monitors projects to track results and frequently our interventions are long term, which allows EBRD better assess the impact. EBRD ensures sustainability through loan leverage but also through very close	

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	Lack of sustainability is also caused because women are not empowered and the project was micro managed causing women to lack confidence to continue. This should be incorporated into project implementation strategy.	Jordan	engagement with the client. The Banks SBS team also offers significant training opportunities for women	
Sustainability <i>Written comments</i>	How will the EBRD address long-term sustainability of this important work – for instance, by minimizing reliance on the Shareholder Special Fund?	US Treasury	To support the sustainability of the approach to promoting gender equality an operational plan will be developed upon approval of the Strategy that will support the mainstreaming of gender throughout the Bank’s operations and benchmark IFI best practice, where relevant. It will include the design and provision of tailored training to strengthen institutional capacity as well as the creation of a network of gender focal points in the Banking Department and other key Departments so as to ensure continuity of approach, consistency, exchange of lessons and a space for innovation	Addressed in Section 2.4 “The operational approach”
Sustainability <i>Comment during consultation meeting</i>	Does ERBD have any specific plans to sustain the socio-economic impact of its projects?	Zift United Project Groups Turkey (Istanbul)	See response above	
Sustainability <i>Comment during consultation meeting</i>	Compliance / partnership with client can be an option, but in some cultures if compliance is not compulsive it will be difficult to sustain the change, it will be just a tick box.	Shevolution Consultancy London	Compliance with the Environmental and Social Policy is compulsory and necessary for the approval of any project.	Partnership with client has been addressed in Section 2.2.1 “Transition Impact”

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Issue	Comment	Contributor	Management Response	Reference Revised Version
Capacity building of the Bank <i>Written comments</i>	When building the capacity of EBRD staff members, we might suggest that you consider involvement in mentoring/volunteering schemes that would allow these employees to engage directly with women to gain a better understanding of their experiences and the challenges they face.	Cherie Blair Foundation London	The Bank will take this into consideration during the implementation of the Strategy.	
Capacity building of the Bank <i>Written comments</i>	How EBRD will further develop its own organizational capacity to implement the Gender Strategy? What sorts of additional training and resources will be provided to staff? What sorts of mechanisms will be developed for internal knowledge sharing? These issues are referenced briefly, but merit further discussion in the Strategy by including information on budgetary resources and metrics to evaluate progress.	US Treasury	This will be further addressed in the internal operational plan following the approval of the Strategy. An internal capacity building assessment and plan will be designed as part of the plan.	
Capacity building of the Bank <i>Written comments</i>	UNDP's experience has shown that just online training is insufficient. There needs to be a longer term and 'deeper' training. There are many resources already available: UNDP has a course, as does UN Women, ILO etc. Most of UN agencies have some sort of mandatory training, but they have found that this needs to be followed with more training.	UNDP New York	See response above	

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Capacity building of the Bank <i>Written comment</i>	Resources – human and financial: sufficient access to human and financial resources are key for successful implementation of the Gender Strategy. We appreciate the emphasis that has been put on the need for in-house training and the progress that the EBRD has made during recent years, including the work by existing gender team. The EBRD headquarter and country offices need to be adequately resourced in this regard (for example through full-time gender advisors and mandatory training for non-expert staff)	Ministry of Finance Sweden	See response above	
Capacity building of the Bank <i>Comment during consultation meeting</i>	Gender training needs to be given to institutions to promote understanding of gender equality. It is not visible in the Strategy.	Sabancı University Turkey (Istanbul)	See response above	
Capacity building of the Bank <i>Comment during consultation meeting</i>	How EBRD can guarantee that technical staff and not only Operation Leaders of the projects actively make effort to make their projects more gender responsive?	Mott MacDonald London	See response above	
Capacity building of the	Suggest more consideration on how the Bank will improve its gender equality	OHCHR	See response above	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
Bank <i>Written comments</i>	practices within the Bank			
Capacity building of the Bank <i>Written comments</i>	Internal capacity building was stated as an important activity necessary for the realization of the objectives of the strategy, having sector specific guidelines or tools would be beneficial.	UN Women	See response above	
Policy dialogue <i>Written comments</i>	More details would be useful on what EBRD means by policy dialogue, how EBRD will implement it	US Treasury	Document has been updated to increase clarity	See, for example, Section 2.3 “Policy Dialogue” and relevant sections under Section 2.4 “The Operational Approach”
Policy dialogue <i>Comment during consultation meeting</i>	Legislative barriers and enforcement of laws: what EBRD is planning to do with government on this?	Mott MacDonald London	EBRD will talk to governments in relation to its projects if some specific legal barriers impede types of jobs or activities that are contemplated in EBRD projects.	
Policy dialogue/ Law reform <i>Comment during consultation meeting</i>	How does EBRD intend to achieve “Amendment of discriminatory laws and discriminatory norms”? Can EBRD weights in and have the authority to change the law, and is there a joint strategy with national institutional partners?	Association “Femmes & Leadership” Tunisia	EBRD works at the project level, and can influence practices at the project level, but it is unable to change cultural norms. On the legislation part, EBRD could contribute to a change through its projects (policy dialogue). For instance EBRD undertakes assessment and studies to understand the restrictions in the law (study in SEMED and Turkey and study in the	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
			Kyrgyz Republic for instance). These studies could constitute a roadmap for discussion.	
Policy dialogue/Land rights <i>Written comments</i>	EBRD should promote more discussions about the relevance of land rights for women to access both finance and economic opportunities	UN Habitat	The Bank will do this in the context of our WiB programmes and linked to the issue of collateral.	
Access to Finance including support of entrepreneurship <i>Comment during consultation meeting</i>	EBRD financing practices and opportunities to access loans are not disseminated enough to the interested public. Maybe the EBRD could organise a mini course for graduate students or others how financing is done and how to access financing e.g. improve the EBRD web site to better inform how loans work, how much money can be accessed. People do not have those skills and this should become part of the Strategy.	Jordan University Millennium Challenge Jordan	EBRD Women in Business programmes aim to support women entrepreneurs by assisting women-led small and medium sized businesses to access finance, know-how and advice. The EBRD's Small Business Support team (SBS) works with businesses of various sizes including women-led micro businesses in both rural and urban setting in order to provide business advisory assistance and help them grow.	
Access to Finance including support of entrepreneurship <i>Comment during consultation meeting</i>	Women do not hesitate to lend but are not informed enough about their loan choices. EBRD needs to reach out to the community and inform how EBRD can support women so that they become income earners.	Millennium Challenge Jordan	See response above	

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Issue	Comment	Contributor	Management Response	Reference Revised Version
Access to Finance including support of entrepreneurship <i>Comment during consultation meeting</i>	Are there any incentives for women to lend from EBRD? Civil society needs sponsors and people who would fund gender related activities to promote the status of women and their human rights.	Mental Health Society Jordan	See response above	
Access to Finance including support of entrepreneurship <i>Comment during consultation meeting</i>	EBRD should further support SMEs and start-up businesses for women through its WIBs project and work more with the private sector, as well as with the Government to buy from start-ups and thus support them.	AWTAD Egypt	See response above	
Access to Finance including support of entrepreneurship <i>Comment during consultation meeting</i>	There are many problems for women in rural areas. Such kind of events is usually provided to women located in big cities, but it would be good to pay special attention to work with rural women but I think it will be more affective to contact directly the grantees.	Kazakhstan	See response above	
Access to Finance including	The Strategy contains important points but has no specific mention of the segments of women targeted with the	Foundation for the Support of Women's Work	The EBRD does not focus on microfinance, because there are other agencies that do so. The gender gap in finance in Turkey lies in	

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support of entrepreneurship <i>Comment during consultation meeting</i>	projects. However, for example, low-income women, micro entrepreneurs or women’s cooperatives in Turkey cannot receive loans from the EBRD since they are considered too risky. Maybe special segments of women should be targeted for loans in the Strategy.	Turkey (Istanbul)	commercial financing and hence the EBRD is working with the commercial banks to this end.	
Access to Finance including support of entrepreneurship <i>Comment during consultation meeting</i>	Issue of relationship with financial institutions: opacity of banking systems and jargon used is leading to women lacking confidence to approach banks.	Association ESPOD Morocco	The Strategy includes support to women’s financial literacy as part of the operational approach to promote women’s access to finance and entrepreneurship.	Addressed in Section 2.4.1 “Access to finance including support of entrepreneurship”
Access to Finance including support of entrepreneurship <i>Comment during consultation meeting</i>	The traditional banking systems have limitations. New structures of financing should start to be discussed by EBRD. In the UK and US there are structures, albeit not yet firmly established, that can serve as examples in crowd funding or other forms of mass funding. Establishing a structure which can assume the risks and coming up with regulations around this might be useful for EBRD.	Garanti Bank, Turkey (Ankara)	The Bank will explore this as part of the innovation in product development within WIBs as part of the operational approach to access finance.	
Collateral	EBRD could organise a workshop on land rights and how women can acquire	Women Access to	The Bank will explore this during the	

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<i>Comment during consultation meeting</i>	collateral resources in order to access loans and financing.	Entrepreneurship Development and Training Society Jordan	implementation of the Strategy.	
Collateral <i>Comment during consultation meeting</i>	Inheritance is the main issue/collateral. How can we increase land rights? What can you do about male dominated sectors?	Jordan	The Bank will endeavour to enhance communication on land rights, either through the projects it invests in (i.e. irrigation) or via work conducted through its Legal Transition Team. EBRD is already working on projects in traditional male dominated sectors but is also focusing on sectors. Through Equal Opportunities projects the Bank encourages women's participation among blue collar and white collar workers.	
Collateral <i>Comment during consultation meeting</i>	One of the key challenges that women face in accessing loans is high collateral that they need to mobilise. This is true for both women and men but especially for women since they have less access to and ownership of assets that can be pledged as collateral. How is the Bank planning to address this issue of collateral?	Kyrgyz Republic	The Bank has developed innovative mechanisms to encourage commercial banks to lend to women and overcome collateral problems. One of them is the risk loss cover integrated in lending mechanisms as part of the WIBs.	
Access to Finance including	Vocational training is needed for women to organize their projects. Proposes support measure targeting women that	Union Nationale de la Femme Tunisienne	EBRD Small Business Support programme provides comprehensive advisory services and	

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support of entrepreneurship <i>Comment during consultation meeting</i>	have been trained, notably for the marketing of their products, because without marketing, no success.	(Union of Tunisian Women) Tunisia	training to women-led MSMEs.	
Access to Skills & Employment <i>Comment during consultation meeting</i>	Annex 2 talks about gender gaps in labour policies but not in labour practices: major concerns are related to the enforcement of law in many countries. How EBRD intend to contribute to reduce this gap?	CEE Bankwatch Network London	EBRD can contribute in legislative reforms through its policy dialogue.	
Access to Skills & Employment <i>Comment during consultation meeting</i>	How does EBRD ensure quality, not only quantity, of jobs?	Activist Jordan	EBRD addresses this through its Policy Requirement 2 in the Environmental and Social Policy	
Access to Skills & Employment <i>Written comments</i>	Section 2.3.4: three 'Accesses' is very clearly laid out and justified with the business case for each 'Access'. The proposed Responses are well designed and illustrate how the whole Strategy comes together and makes sense. The section includes some very progressive language, for example: additional resources needed for disadvantaged / minority groups; dialogue with CSOs; development of knowledge and skills that women require to access justice and	CEE Bankwatch Network London	EBRD addresses this through its Policy Requirement 2 in the Environmental and Social Policy	

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	<p>legal remedies; support for freedom of association and forms of gender-responsive collective bargaining; support for workers awareness-raising about their gender rights.</p> <p>On the other hand, the part on Access to Employment and Skills falls short of discussing and addressing the fact that employment no longer provides a guarantee against poverty and exclusion.</p> <p>An analysis of thirteen research projects on inequality in the EU, published in 2010 by DG Research of the European Commission, finds that one third of working adults in the EU member states are in poverty. Additionally, with relevance to the Strategy is the finding that non-standard forms of work (shorter hours, intermittent and temporary work) are associated with widening earnings inequality and the expansion of in-work poverty, and due to women's over representation in non-standard work, women are put at a greater risk of poverty than men.</p> <p>Additionally, the DG Research report suggests that for the last three decades worker's wages have not kept up with the increasing labour productivity, which has caused raising inequality and</p>			

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	<p>poverty in the EU during time of sustained growth (before the crisis). A 2014 White House report also argues that raising the minimum wage is especially important for women, who are more highly concentrated in low-wage sectors, and that it will help reduce poverty among women and their families, as well as make progress towards closing the gender pay gap.</p> <p>Therefore, additionally to access to employment, the Strategy should stress the importance of the quality of employment and the need for decent pay, especially in the low-wage sectors. With regards to 'flexible working schemes' and non-standard jobs, the Strategy should target policy-makers and employers to remove the association between non-standard hours and low pay, in order to address wage inequality and close the gender pay gap.</p>			
<p>Access to Skills & Employment</p> <p><i>Comment during consultation meeting</i></p>	<p>How can the EBRD assist through projects in overcoming wage gaps that women experience not only in education and health but in other sectors too?</p>	<p>Mizan for Law Organization</p> <p>Jordan</p>	<p>The EBRD Environmental and Social Policy provides for equality of pay in line with ILO requirements at compliance levels.</p>	
<p>Access to Skills</p>	<p>Can EBRD assist in building the capacities of women to be competitive</p>	<p>I dare</p>	<p>EBRD works with its clients and looks at the policies in place, encouraging employers to</p>	

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& Employment <i>Comment during consultation meeting</i>	in the job market and to keep on to their jobs, so that they can, in turn, acquire resources and apply for loans	Jordan	meet these requirements or amend business practice, by defining progression and ensuring appropriate training, by attempting to change mind-sets by showing the benefits of a diverse workforce, etc. Our SBS team also provides advisory services to women seeking to grow their businesses.	
Access to Skills & Employment <i>Comment during consultation meeting</i>	Information campaign for women's self-confidence building is needed. Women do not have an access to quality of employment is dropping as women don't have access to adequate employment. It would be good to provide internships possibilities opportunities for young women without a lack the work experience in the companies of the Bank's clients EBRD.	Kazakhstan	EBRD has been working and intends to continue doing so as part of this Strategy with its clients to introduce improved HR policies and standards and to create better access to employment opportunities for female candidates and staff with the aim of raising the number of women employed at the Company. As relevant, the Bank supports its clients to recruit young entrants by encouraging clients reach out to universities, which prepare graduates in relevant sectors in which clients operate.	
Access to Skills & Employment <i>Comment during consultation meeting</i>	Given the Bank's specific mandate and the modus operandi, it is recommended that the Bank provides information to its local consultants about the Bank's expectations of the project deliverables ahead of starting projects by providing training and information sharing sessions. Successful cases should be wider disseminated. Solidarity among women should be promoted. Textile industry	Kyrgyzstan	EBRD intends to do so as part of the implementation of the Strategy.	

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	employs only women, the labour conditions are bad and no solidarity from women bosses is provided. There is no vision of business and lab or market future, including gender equality.			
Access to Skills & Employment <i>Comment during consultation meeting</i>	EBRD could fund some scholarships for students to promote women's participation in male dominated sectors and promote the role models of women successful in those sector	Silsly Municipality Turkey (Istanbul)	While EBRD does not provide direct funding/scholarships, it works with its clients to promote women's participation in the workforce in male-dominated sectors. Some of the interventions that our clients use are scholarships and internships.	
Access to Skills & Employment <i>Comment during consultation meeting</i>	How does the EBRD strategy differ from already existing policies in terms of access to employment? Does it take into consideration the social role of women, not only child care but also housing and part-time jobs.	Morocco	EBRD's strategy is a framework on how to mainstream gender into the Bank's operations. One main pillar is access to employment and there the Bank will look at the issue of work and life balance.	
Access to Skills & Employment <i>Comment during consultation meeting</i>	EBRD should work on childcare policies trying to support the involvement of men in home care, etc.	Sisly Municipality Turkey (Istanbul)	EBRD can do that within the realm of its mandate working with its clients.	
Access to Skills & Employment <i>Comment during consultation</i>	Essential to integrate the notions of value chains and added-value. E.g. high rate of unemployed educated women. These women are not integrated in value chain to support other women in	Association "Femmes & Leadership" Tunisia	The Strategy includes support to raise women's participation in the supply chain.	Addressed in Section 2.4.2 "Access to Employment & Skills"

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<i>meeting</i>	different sectors (agri-business, etc).			
Access to Services <i>Written comments</i>	Why EBRD has not done so much in services? EBRD could work with other MDVBs to establish data	US Treasury	EBRD has experienced challenges in obtaining data to show that access to services enabled women to be more economically active and document the link to economic inclusion and transition	
Access to Services <i>Comment during consultation meeting</i>	Municipalities should be able to benefit from EBRD services to assist people and provide an outreach to women seeking assistance, for instance, in access to services and infrastructure development. This should be incorporated into the strategy and become part and parcel of EBRD projects. Most municipalities have done development studies and have strategic initiatives that could be supported through the implementation of the EBRD Gender Strategy.	Sahab Municipality Jordan	As the EBRD starts to expand its investments into regional and rural areas it will look into the way EBRD projects/lending are structured so as to ensure that women's issues in infrastructure and transportation are addressed.	
Access to Services <i>Comment during consultation meeting</i>	EBRD should be clearer on how EBRD intends to address women's human rights in rural areas, through its implementation, e.g. access to schooling for instance because of infrastructure problems, lack of safe transportation.	National Centre for Human Rights Jordan	See response above	
Access to Services <i>Comment during</i>	In many countries the lack of childcare services hinders women's participation in public and economic life.	Croatia Employers Association	EBRD works with its clients in the context of our Equal Opportunities projects to persuade them of the benefits of a diversified workforce and the type of support services needed to	

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<i>consultation meeting</i>		Croatia	improve women's participation in the workforce.	
Specificity of EBRD	EBRD should better state that it is not an IFI and therefore works primarily through the private sector. It is not a multilateral neither a bilateral institution	Individual, Social and economic development consultant	The Executive Summary states 'This document is the EBRD's Strategy for the Promotion of Gender Equality 2016-2020. It is designed with two aims: to align with the Bank's mandate of fostering transition to market based economies while promoting sustainable development and applying the principles of multiparty democracy and pluralism; and, to mainstream gender equality into EBRD operations by 2020, as set out in the EBRD's Strategic and Capital Framework ("SCF") 2016-2020'	
Specificity of EBRD	The Strategy's Annex 4 provides a good overview on how other multilaterals operate in EBRD's CoOs. What might equally be useful is a discussion on how EBRD will work with and build capacity of local stakeholders to carry out policy dialogue, while fostering south-south approach where possible. Reference could also be made to the G20 and its goals on creating 100 million jobs for women among others.	World Bank	Although the Strategy document does not refer to the G20 commitment, as part of our policy dialogue the Bank is coordinating with the W20 Group of the G20 in Turkey.	
EBRD internal gender mainstreaming <i>Written</i>	Mainstreaming in the context of EBRD's operations should be more about ensuring that its investment and policy dialogue at all times is cognisant of gender based social dynamics so that	Social and economic development consultant	The Bank will take this into consideration during the implementation of the Strategy.	

Table 5: Results of the Consultation on the EBRD Draft Gender Strategy

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<i>comments</i>	its projects can be designed more effectively and the safeguards can be managed with efficacy			
EBRD internal gender mainstreaming <i>Written comments</i>	External and internal gender commitments. The Strategy might want to highlight (maybe in an Annex?) how EBRD's is internally committed to being an equal opportunity employer focused on diversity & inclusion and how that approach is reflected also in its (external) client engagement.	World Bank	The Strategy is an operational tool to enhance the promotion of gender equality through Bank investments and operations. As such the terms of reference did not encompass internal HR.	
EBRD internal gender mainstreaming <i>Written comments</i>	The Gender Strategy should encompass the whole EBRD. It is important that the Bank lead by example and the Gender Strategy should therefore include bank's work on gender equality within its own organisation. The Bank must achieve a better gender balance in senior positions. It is also important that the Bank achieve a better gender balance in the Bank's appointment of Board nominees for companies the Bank has invested in. The Gender Strategy should set out a detailed road map and clear (quantitative as well as qualitative) targets and outcomes in this respect, so that it can be monitored. For example, a time line should be included for achieving a better gender balance in senior positions and for achieving the EDGE certification. Also concrete proposals should be	Ministry of Finance Sweden	See response above	

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	included in order to promote work life balance such as parental leave and related issues. HR should be actively engaged in contributing to this part of the strategy.			
Structural causes of inequality <i>Written comments</i>	The specific references to macroeconomics in the draft Gender Strategy are limited to labour markets. While there's reference to CSRF, it is only in the context of monitoring and measuring results. Progress in the promotion of gender equality can only occur when the structural causes of gender equality are addressed, and this must start by addressing the overall macroeconomic framework, and ensuring that gender as a category of analysis is mainstreamed, not only into the CSRF, but also in the knowledge products generated by the EBRD through its research. This could include analysing and building responses to mitigate any negative impacts of austerity measures on women; the promotion of trade policies that do not disproportionately negatively impact women; and the promotion of decent work, as important objectives of macroeconomic policy.	UN Women	The strategy references the many social, political, cultural and economic dimensions which inhibit gender equality. Gender equality requires that institutions, laws, policies and social norms allow women to access and benefit from opportunities on the same footing as men. For this reason, the strategy establishes policy dialogue as an essential part of its Operational Approach, to support an enabling environment for gender equality, wherein one of its expressions would be found in the labour market.	See Section "Operational performance and delivery"
IFC Reference	Annex 4 mentions that EBRD was the first IFI to launch comprehensive	World Bank	Claim removed and edit made.	Addressed in Annex 5

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<i>Written comments</i>	<p>“Women in Business Program”. This might be misleading as IFC has launched its “Gender Entrepreneurship Markets Program” in 2005 and its “Banking on Women Program” in 2010 providing financing and advisory services to clients across six regions including ECA and the Middle East & North Africa.</p> <p>On Women’s Entrepreneurship, the Strategy may want to highlight IFC’s partnership with Goldman Sachs’s 10,000 Women initiative, which resulted in the launch of the Women Entrepreneurs Opportunity Facility in 2014. The facility will provide up to \$600 million to improve access to capital for approximately 100,000 women entrepreneurs. While there is some overlap in geographical coverage with EBRD’s COOs, the Strategy may want to emphasize the difference in delivery model.</p> <p>Small corrections: Please note that IFC launched the Banking on Women Bond Program in 2013, not 2010. Regarding IFC’s Women Employment Offering, it does not employ its own certification process. The EDGE Certified Foundation is a strategic partner as part of the World Bank Group’s global <i>SheWorks</i> private sector partnership</p>			

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	initiative. You may want to include the following link, which provides an overview of IFC's Gender Work.			

Annex 1: Other Stakeholders Consulted

EBRD clients:

- Alivaria (Belarus)
- Juhayna (Egypt)
- Egyptian National Railways (ENR) (Egypt)
- Bishkek Trolleybus Company (Kyrgyz Republic)
- Osh Public Transport Company (Kyrgyz Republic)
- Victoria Group (Serbia)
- OMV Petrom (Romania)
- Finansbank (Turkey)
- Garanti/Celim (Turkey)
- IDO (Turkey)
- Isbank (Turkey)
- TAV (Turkey)

Bilateral shareholders:

- Belgium
- Canada
- EU
- Finland
- France
- Germany
- Italy
- Japan (JBIC)
- Netherlands
- Norway
- Spain
- Sweden
- UK (DfID)
- USA (Treasury)

Multilateral Development Banks:

- African Development Bank (AfDB)
- Asian Development Bank (ADB)
- Caribbean Development Bank
- European Bank for Investment (EIB)
- Inter -American Development Bank (IADB)
- Islamic Development Bank (IDB)
- International Fund for Agricultural Development (IFAD)
- World Bank (WB) / International Finance Corporation (IFC)

Members of the Internal Working Group in EBRD:

- OGC
- Banking (Financial Institutions, Energy Group, Infrastructure Group, ICA, Equity, SBS, E2C2)
- ESD
- OCE
- DCF
- TCT
- Communications
- CSEU
- CSRM
- SGO

Annex 2: List of participants in public consultation meetings

Country	Name of organization
Albania	Refleksione Women Association
Bulgaria	CEE Bankwatch Network
Croatia	Croatia Employers Association
Egypt	AWTAD
FYROM	Organisation of Turkish women in Macedonia -Derya
Gambia	The Republic of The Gambia Embassy in Turkey
Georgia	Caucasus Development Group The Georgian Association "Women in Business"
Jordan	University of Jordan Mizan for Law Organisation Millennium Challenge Account-Jordan Human Society for Rights of Disabled People Organisation General Federation of Jordanian Women Organisation The Royal Society for the Conservation of Nature Environment & Social Director-MCA Sahab Municipality Women Access to Entrepreneurship Development and Training Society – (WAEDAT) Activist Embassy of Sweden Embassy of Netherlands Freelance Information and Research Centre - King Hussein Foundation Red Sea Trading Mental Health Society National Centre for Human Rights UNDP Ministry of Social Development National Committee For Family Affairs Consolidated Consultants for Engineering and Environment
Kazakhstan	PF “Centre of new environmentally safe technologies”
Kyrgyz Republic	Protection of human rights movement “BirDuino Kyrgyzstan” Office of the Ombudsman of the Kyrgyz Republic Kazakh-German University
Montenegro	Montenegrin Employers' Federation (MEF/UPCG) Business Women Association of Montenegro
Morocco	RARBA (Réseau des Associations de la Réserve de la Biosphère Arganeraï) TIZNIT Coopératives de Conseil en Entrepreneuriat et Coopération CIH-BANK Association Tiqlit pour le développement rural et l'environnement Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH Noun consulting

	<p>Mutada Maroc Multiple Initiatives pour la protection des droits des femmes (IPDF) Association ESPOD Réseau esprit d'initiative de l'économie sociale et solidaire Guelmim CGEM Institut Scientifique Terjaoui International de la Bonne Gouvernance et de la Planification Stratégique du Développement Humain Durable (Institut Scientifique ISTIGOP)</p>
Slovenia	Institute for Social responsibility
Tajikistan	<p>Aarhus Centre Dushanbe, NGO for women "Bonu" PO "Association Woman and Society" Gender and Development NGO</p>
Tunisia	<p>Association "Femmes & Leadership" Union Nationale de la Femme Tunisienne (UNFT)</p>
Turkey	<p>Istanbul Arel University Sabancı University Euro College İstanbul Yeditepe University PWN Istanbul Zift United Project Groups KEİG Platform Şişli Municipality, İstanbul Yeşil Valiz Association for Responsible Tourism GAP Regional Development Administration Turkish Employment Agency Council Of Higher Education Ministry For EU Affairs Ministry of Family and Social Policies Ministry of Development Turkish Confederation Of Employer Associations Development Workshop Cooperative Foundation for the Support of Women's Work Agence Française de Développement (AFD) SIDA Si Gaziosmanpasa Soroptimist Club Kıymet-i Harbiye Sustainability Consultancy EsA Consulting SRM Consulting Prosis Consultancy Koç Holding A.Ş. Garanti Bankası A.Ş. İDO Istanbul Fast Ferries Co. Inc. Local Media</p>
Turkmenistan	Kazakh-German University
Ukraine	CEE Bankwatch Network

PUBLIC

Uzbekistan	Kazakh-German University Women of Mountains Group (WMG)
United Kingdom	Amnesty International Mott MacDonald Gender and International Development Consulting Ergon Associates Shevolution Consultancy