

Review of EBRD's 2008 Environmental and Social Policy Stakeholder Engagement Plan (SEP)

Introduction

The Board of Directors of the European Bank for Reconstruction and Development (EBRD) approved an Environmental and Social Policy (ESP) and ten related Performance Requirements (PRs) on the 12th May 2008. The Policy details the commitments of the Bank's Founding Agreement 'to promote in the full range of its activities, environmentally sound and sustainable development'. The Policy is subject to review every five years. As part of the review of a governance policy, the 2011 Public Information Policy (PIP) requires the Bank to consult with stakeholders.

The Bank's Environment and Sustainability Department is responsible for the review process and the Board of Directors is responsible for the final decision on the policy.

The review process commenced in 1Q 2013 and is providing a number of opportunities for stakeholder input. In March 2013, the Bank sought views on how the existing Environmental and Social Policy (ESP) has been implemented, and what changes might be considered in the light of stakeholder experience. In the second stage of the policy review in January 2014, a draft revised policy will be disclosed on the Bank's website and comments on the revised draft will be sought. There will also be a process of engagement with 'internal' stakeholders such as Bank staff and shareholder governments, and other external stakeholders, such as the Environment and Social Advisory Council (ESAC). In addition, there will be a number of workshops and other opportunities for input prior to the final draft being sent to the Board of Directors for consideration. The final approved policy will be published on the Bank's website, along with a report on public comments and how they were taken into account.

This Stakeholder Engagement Plan (SEP) (i) outlines EBRD's general approach to policy review and stakeholder consultation during the review process; (ii) identifies key stakeholder groups; (iii) provides a strategy and timetable for sharing information and consulting with these groups during appropriate phases of the review process; (iv) summarises how consultation and disclosure activities will be documented and reported; and (v) who to contact if there are comments or questions about the process.

Guiding Principles

The goal of consultation on policies is to ensure that adequate and timely information is provided to interested parties and to those potentially affected by the Bank's operations and policies that guide operations, and that these groups are given sufficient opportunity to voice their opinions and concerns. Important considerations include:

- Providing for dialogue with stakeholders in English, Russian, and French languages
- Allowing for easy accessibility to both written information and to the consultation process by relevant stakeholders via dedicated e-mail address (ESPReview@ebrd.com), the Bank's website (www.ebrd.com), Resident Offices, and through an e-mailing list.

- Taking care to reach stakeholders that are representative of the full range of issues covered within the ESP.
- Defining a clear mechanism to disclose results of consultation.

Policy consultation requirements and approach

From 8 March 2013, the Bank requested comments on the 2008 Environmental and Social Policy (ESP) and PRs until 20 May 2013 (extended to 30 May, on request of civil society representatives). Of particular interest was feedback on how the 2008 Policy has performed, what changes in good international practice need to be taken into account, how changes could bring about more desirable outcomes as well as suggestions regarding the scope and nature of the documents. Based upon the results of benchmarking, discussions with peer organisations, and consultation with stakeholders, the Bank will prepare a draft revised Policy and PRs.

In accordance with the 2011 PIP, the draft revised ESP and PRs will be posted on the EBRD web site for a minimum of 45 calendar days for public comment. A summary of the comments that are received from stakeholders and how these have been taken into account will be provided to the Board of Directors and subsequently posted on the Bank's web site following the Board discussion.

The Bank also plans to hold a series of stakeholder workshops when the revised draft Policy is released for public comment.

Overview of the consultation process

Information on www.EBRD.com will inform stakeholders about the review process and make available related documents. Stakeholders will be kept abreast about meetings and document release by signing up at ESPReview@ebrd.com.

	Action	Estimated time period
(1)	Consultation on basis of 2008 ESP	
	Prior to preparing the first draft of the revised policy, the Bank will request comments and recommendations on the basis of the existing ESP from January until April and will include discussions at the Bank's Annual Meeting in Istanbul in May 2013.	Until 20 May 2013
(2)	First draft of new Policy and PRs	
	Bank staff will prepare the first draft of the new Policy, taking into account comments received on the existing ESP. A summary of comments received on the existing policy will be disclosed on the website.	Summer 2013
(3)	Consultation on draft new Policy and PRs	
	The draft policy document will be posted in English, Russian and French languages on the EBRD website for public comment for a minimum of 45 calendar days. The published document will indicate the closure date for comments. In addition to soliciting written comments, the Bank will conduct 7 public workshops to discuss the issues at stake, the alternatives, and to solicit comments. These workshops will be held in London and in the region of the Bank's operations, including one in the SEMED region. The workshop reports will be posted on the EBRD website in both English (and Russian or French, where appropriate). For some stakeholder groups, alternative consultation processes may be introduced – see stakeholder section below for details.	1Q-2014
(4)	Draft of revised Policy and response to stakeholder comments	

	Based on the benchmarking, analysis, internal discussion and comments received during the consultation period, a revised draft of the new Policy will be prepared. The Bank will also prepare a summary of comments received together with the Bank's response. Both documents will be submitted for consideration by the Bank's Senior Management.	
(5)	Board consideration	2Q 2014
	The final draft new Policy and PRs will be submitted to the Board of Director for approval. The Board will also receive the summary of stakeholder comments and Bank response. Following Board approval, the Bank will post on the EBRD website: English, Russian and French versions of the approved Policy and English version of the summary of the stakeholder comments and Bank responses.	
(6)	Translation of new Policy into other languages of EBRD countries of operation on a needs/request basis	Implementation

Details of proposed interaction with identified Stakeholder Groups

- **International Financial Institutions and Commercial Banks:** The EBRD co-invests and works with a number of other IFIs within its countries of operation (such as the EIB, World Bank, IFC, ADB, IADB, AfDB, and IsDB). The Bank also syndicates financing with many commercial banks, export credit agencies and bilateral development finance institutions. Specific outreach will be made to individual partner institutions and, collectively, to the associations of these institutions such as the MFI Working Group on Environment, the European Principles for Environment signatories, the European Development Finance Institutions, and the Equator Banks. Information will be circulated by email and meetings and webinars, as appropriate.
- **Clients and Business/Industry organisations:** Comments from clients will be requested via surveys and focus on lessons learned and on gaps identified during benchmarking. A selection of clients with environmental and social category A, B, C and FI projects will be surveyed, depending on the issues raised. Dialogue through email, webinars and face-to face meetings will be held as appropriate. Comments are welcomed from all clients as part of the general stakeholder process, as well as via these more focused communications. A number of industry associations will be contacted to allow for more sector specific comments to be taken into account. If you would like your organisation or company to be contacted, please email ESPReview@ebrd.com.
- **International and local CSOs (e.g., environmental, human rights, health, gender, and other social issues):** An e-mail list of groups particularly interested in Bank policy and environmental/social issues in the Bank's region of operation will be notified of the initial stage of the consultation process, as well as subsequent stages in English, Russian and French languages. The e-mailing list and website will also be used to notify groups of the public workshops. Any stakeholders are welcome to contact the Bank and have their name added to the e-mail list. As in previous revisions to the Environmental and Social Policy, the Bank will explore the possibilities for financial support to assist local CSOs with the cost of participating in one of the regional workshops (normally covering the cost of transport and accommodation for a limited number of participants) in accordance with published criteria for selection.

- **ILO and Trade Unions:** The Bank will discuss labour and health and safety issues with ILO experts, employers’ representatives and Trade Union representatives and will communicate via email with this group. Dialogue through email, webinars and face-to face meetings will be held, as appropriate .
- **Other International Organisations:** Dialogue through email, webinars and face-to face meetings will be held as appropriate with organisations such as (e.g., Secretariats of relevant Conventions (such as Aarhus, Espoo, CBD), UNEP, WHO, IMO, Directorates within the European Commission, IUCN, Council of Europe).

Stakeholder Engagement Meetings

A number of stakeholder engagement meetings will be held in locations throughout the Bank’s regions of operation. The venues for the meetings are as follows:

Date	City, country	Language(s) of Meeting
04.02.2014	Casablanca Morocco	English, French
07.02.2014	Kiev, Ukraine	English, Russian
11.02.2014	Tbilisi, Georgia	English, Russian
14.02.2014	Almaty, Kazakhstan	English, Russian
18.02.2014	Moscow, Russia	English, Russian
21.02.2014	Sofia, Bulgaria	English
25.02.2014	London, England	English

Further information

For registration and information about the stakeholder engagement meetings, please contact the Regional Environmental Center, which is coordinating the logistics for the meetings, including funds that EBRD has made available for financial support for meeting participation for a limited number of participants who would not otherwise be able to attend. Please see www.rec.org/ebrd_consultation or email ebrd_consultation@rec.org for more information.

Questions and comments about the policy review process can be directed to the Environment and Sustainability Department (ESPReview@ebrd.com) in the first instance. Staff members will then respond initially by phone or email.

