

# 24th Meeting of the Working Group of the Parties to the Aarhus Convention

October 2020



**European Bank**  
for Reconstruction and Development

# EBRD stakeholder engagement - principles and approach

The EBRD encourages proactive and consultative engagement at multiple levels:

- **Institutional Level**

The Bank facilitates direct engagement with both Management and the Board. This includes an annual private meeting between civil society and the Board of Directors

- **Policy Level**

The Bank conducts public consultations on each of its key policies and strategies, and bilateral meetings with civil society in relation to specific issues

- **Project Level**

The Bank establishes requirements for disclosure in relation to each of its projects – both for Clients and for the Bank

# EBRD stakeholder engagement – approach to projects

- The EBRD promotes proactive and consultative stakeholder engagement on projects throughout project life cycle, including in addressing any concerns or complaints
- The EBRD requires compliance with applicable local disclosure, consultation and grievance redress requirements. Most countries where the EBRD has operations are signatories to the Convention
- In addition, in relation to each project, clients must:
  - Undertake project stakeholder engagement proportional to the associated environmental and social risks and stakeholder interest; and
  - Establish a project-specific grievance mechanism

Details of the Bank's stakeholder engagement principles and practices are set out in its corporate governance policies

# EBRD stakeholder engagement - architecture



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## **Access to Information Policy (and Directive)**

Operates to ensure the transparency of Bank operations

Sets out the principles governing the Bank's transparency regime, including the presumption in favour of disclosure

## **Independent Project Accountability Mechanism**

Permits complaints in the event of alleged non-compliance with the Access to Information Policy or Environmental and Social Policy

## **Environmental and Social Policy (and Performance Requirement 10)**

Requires clients to implement effective and inclusive stakeholder engagement as an integral part of E&S risk management

Stakeholder engagement is required during project preparation and implementation, to a degree proportional to the associated environmental and social risks

# EBRD stakeholder engagement - implementation



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- The Bank reviews its governance policies on a five-year cycle. The most recent review resulted in approval of the Bank's corporate revised policies in May 2019
- These revised policies came into effect in 2020

| Internal Activities   | External Activities   |
|---|---|
| Clarifying and harmonising understanding of 'meaningful consultation' and triggers for stakeholder engagement | Proactively disclosing changes to stakeholder engagement arrangements on all external-facing fora   |
| Bank-wide training on content and application of corporate governance policies, as applicable to teams        | Making explicit that stakeholder engagement and grievances should be free from retaliation  |
| Raising awareness regarding application of corporate governance policies, including appointing focal points   | Working consistently with clients to mainstream stakeholder engagement and disclosure practices – including development of dedicated guidance during COVID-19 |
| Increasing resources dedicated to monitoring and processing requests for information                          | Timely disclosure of Project Summary Document for all projects  |

# EBRD stakeholder engagement – challenges and opportunities

- **Challenges:**

- Implementing, monitoring and ensuring compliance with EBRD standards on disclosure and engagement consistent with restrictions imposed in response to COVID-19
- Balancing legitimate concerns and interests in information held by EBRD (e.g. commercially sensitive information) in relation to any project with need for stakeholder engagement
- Assuring stakeholder engagement throughout all project stages

- **Opportunities:**

- Increasing remote engagement can permit development and use of innovative approaches to consultation and disclosure; may permit engagement with additional stakeholders
- Collaborative and cooperative standard-setting on new types and categories of disclosure
- Opportunities for local resource reinforcement and capacity-building