

# 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



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- **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