Environmental and Social Sustainability Framework

Consultation Questions

3 June 2021

The European Investment Bank (EIB) is inviting the public to contribute to the review of its Environmental and Social Sustainability Framework (ESSF).

This document contains questions intended to guide the public consultation by soliciting views about specific issues. Answers to these questions must be submitted in writing, preferably via the [online survey](https://consult.eib.org/consultation/essf-2021-en/consultation/). Those who wish to contribute via email may do so at: [**essfconsultation@eib.org**](mailto:essfconsultation@eib.org). Contributions must be received by   
**6 August 2021** and will be published on the [public consultation web page](https://consult.eib.org/consultation/essf-2021-en).

The public consultation web page provides more information about the review, including the **draft new Environmental and Social Policy and the draft revised Standards.**

The [explanatory note](https://consult.eib.org/consultation/essf-2021-en/user_uploads/explanatory_note_en.pdf) sets out the context for the review and provides an overview of the main changes currently under consideration.

The EIB Group will consider, and provide reasoned comments on, all of the duly submitted contributions.

This document is available in [English](https://consult.eib.org/consultation/essf-2021-en/user_uploads/questionnaire_en.docx), [French](https://consult.eib.org/consultation/essf-2021-en/user_uploads/questionnaire_fr.docx), [Spanish](https://consult.eib.org/consultation/essf-2021-en/user_uploads/questionnaire_es.docx) and [Portuguese](https://consult.eib.org/consultation/essf-2021-en/user_uploads/questionnaire_pt.docx).

Thank you for your engagement with the European Union’s Bank.

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# **About this questionnaire**

This questionnaire is divided into 17 chapters.

In addition to asking questions about the draft new EIB Group Environmental and Social Policy (Chapter A) and general and specific questions about the revised Environmental and Social Standards (Chapters D-N), the EIB would also like to hear your views on its approach to human rights (Chapter B) and on certain cross-cutting themes, such as gender (Chapter C). These chapters are all optional – you may answer as many or as few questions as you wish.

* Chapter A: EIB Group Environmental and Social Policy – 5 questions
* Chapter B: The EIB’s approach to human rights – 5 questions
* Chapter C: Cross-cutting issues – 6 questions
* Chapter D: Environmental and/or social impacts and risks (Standard 1) – 8 questions
* Chapter E: Stakeholder engagement (Standard 2) – 8 questions
* Chapter F: Resource efficiency and pollution prevention (Standard 3) – 5 questions
* Chapter G: Biodiversity and ecosystems (Standard 4) – 9 questions
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* Chapter I: Involuntary resettlement (Standard 6) – 7 questions
* Chapter J: Vulnerable groups and Indigenous Peoples (Standard 7) – 8 questions
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* Chapter M: Cultural heritage (Standard 10) – 5 questions
* Chapter N: Intermediated finance (Standard 11) – 7 questions
* Chapter O: Additional comments
* Chapter P: About you – personal information of the respondent(s)
* Chapter Q: Consent – 1 question (mandatory)

The information requested in Chapters P (About You) and Q (Consent) is mandatory

Most of the questions are in closed, multiple-choice format. All multiple-choice questions provide space for you to add comments. This is not mandatory, but it would help us greatly if you could explain your answers, providing concrete examples, where possible, to illustrate your points.

Additional comments and suggestions you may have on matters not covered in any of the questionnaire’s chapters can be shared in Chapter O.

Each chapter should take about 10-25 minutes to complete.

**Consent**

In accordance with the EIB Group Transparency Policy, the EIB operates under the presumption of disclosure. For public consultations, this means that the EIB will publish all contributions on the public consultation website at the end of the consultation period. Respondents may nonetheless choose to answer anonymously.

To enable respondents to speak freely without any possible risk of reprisal and to ensure their feedback is meaningful, their answers to all the questions in Chapter B (human rights), as well as question 2 in Chapters D-N (Standards 1-11), will, however, not be automatically published as part of their contributions.

Should respondents nevertheless wish to have their responses to these specific questions published in the interest of transparency, they can explicitly authorise us to do so by giving their consent in Chapter Q.

# **Chapter A: EIB Group Environmental and Social Policy**

**1. Is the EIB Group’s Environmental and Social Policy strong enough to ensure that its investments adequately contribute to the objectives of EU policies and the Sustainable Development Goals (SDGs)?**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | Not strong at all | Somewhat strong | Moderately strong | Very strong | Extremely strong | Don’t know |
| EU policies |  |  |  |  |  |  |
| SDGs |  |  |  |  |  |  |

Please explain your answer:

**2. Does this Policy strike the right balance between commitments to strengthen the Group’s safeguards and the pursuit of opportunities to increase positive environmental and social outcomes?**

Yes, the Policy strikes the right balance

No, the Policy does not strike the right balance

Don’t know

Please explain your answer:

**3. Do the 10 ‘key focus areas’ (see paragraphs 2.3-2.14 of the Policy) cover all areas that you believe should be addressed by the Policy?**

Yes, the 10 key focus areas cover all areas that should be addressed

No, some elements are missing

Don’t know

If you have answered “No”, please list up to three areas you believe are missing and suggest how they should be addressed:

**4. The Group has struck the right balance between the various environmental, climate and** **social challenges.**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Strongly disagree | Disagree | Neither agree nor disagree | Agree | Strongly agree | Don’t know |

Please explain your answer:

**5. The EIB Group’s Environmental and Social Sustainability Framework ensures that its operating model is fully geared towards sustainable finance, as defined in Chapter 3 of the Environmental and Social Policy.**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Strongly disagree | Disagree | Neither agree nor disagree | Agree | Strongly agree | Don’t know |

Please explain your answer:

There are no further questions on the Environmental and Social Policy. If you would like to add anything on the Policy that is not already covered by the questions in this chapter, you may do so in the box below.

**Additional comments:**

# **Chapter B: The EIB’s approach to human rights**

Guided by the Charter of Fundamental Rights of the European Union, the EIB requires promoters to respect human rights, avoid infringing on the rights of others, and address any negative impacts on human rights arising from operations financed by the EIB.

Human rights form an integral part of the Environmental and Social Framework. Projects which limit individual rights and freedoms or violate human rights are excluded from EIB activities. The EIB Group’s requirements in this respect are clearly outlined in its Environmental and Social Policy.

In addition, human rights considerations are addressed through specific requirements in the Standards to which explicit references have been added. Promoters have an obligation to consider human rights as part of the environmental and social impact assessment process. When risks are identified, promoters are requested to undertake specific assessments and put in place adequate mitigation measures.

When the EIB is asked to support an operation, it undertakes a human-rights-responsive due diligence process in which impacts and risks are screened and assessed against its Standards. This due diligence process is informed by country-specific risks and is based on the likelihood, frequency and severity of risks and impacts affecting human rights. The due diligence process may also be an opportunity to put in place additional measures that contribute to the advancement of human rights.

If, as a result of this internal due diligence process, the EIB identifies salient risks to human rights, it will take appropriate action. The Standards already provide the means to manage such risks, for example by enabling the Bank to require additional assessments and audits to be carried out, and specific plans to be developed and implemented, etc. The inclusion of contractual obligations and undertakings, such as reporting and monitoring requirements, gives the EIB the capacity and leverage to require promoters to address any impact or risk, even if not previously identified during the impact assessment process.

1. **The EIB pursues an integrated human rights-based approach. Is this integrated approach to human rights sufficiently clear?**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Not at all  clear | Somewhat  clear | Moderately clear | Very  clear | Extremely clear |

Please explain your answer:

1. **Are there any elements missing that would strengthen the effectiveness of the integrated human rights-based approach?**

|  |
| --- |
| No, no elements are missing  Yes, some elements are missing  Don’t know |

Please explain your answer:

1. **Is the EIB’s approach to human rights, including its requirements for project promoters, clearly described in Standard 1?**

|  |  |
| --- | --- |
| Yes, the EIB’s approach is clearly described  No, it is not clearly described  Don’t know |  |

Please explain your answer:

1. **Each Standard refers to specific and relevant requirements regarding human rights. Are these references sufficient?**

|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes – sufficient | No – insufficient | Don’t know |
| Standard 2 – Stakeholder engagement |  |  |  |
| Standard 3 – Resource efficiency and pollution prevention |  |  |  |
| Standard 4 – Biodiversity and ecosystems |  |  |  |
| Standard 5 – Climate change |  |  |  |
| Standard 6 – Involuntary resettlement |  |  |  |
| Standard 7 – Vulnerable groups and Indigenous Peoples |  |  |  |
| Standard 8 – Labour rights |  |  |  |
| Standard 9 – Occupational and public health, safety and security |  |  |  |
| Standard 10 – Cultural heritage |  |  |  |
| Standard 11 – Intermediated finance |  |  |  |

If the references are insufficient, please explain what might be missing:

1. **How difficult is compliance with human rights at the project level, for example in view of your local context?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Extremely difficult | Difficult | Moderately difficult | Somewhat difficult | Not at all difficult | Don’t know |

Please explain your answer by listing up to three challenges:

There are no further questions on human rights. If you would like to add anything that is not already covered by the questions in this chapter, you may do so in the box below.

**Additional comments:**

# **Chapter C: Cross-cutting issues**

1. **Have gender considerations been sufficiently strengthened throughout all the relevant Standards, specifically Standards 2 (Stakeholder engagement), 5 (Climate change) and 6 (Involuntary resettlement)?**

|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes – sufficiently strengthened | No – not sufficiently strengthened | Don’t know |
| Standard 2 – Stakeholder engagement |  |  |  |
| Standard 5 – Climate change |  |  |  |
| Standard 6 – Involuntary resettlement |  |  |  |

Please explain your answer:

1. **Are the requirements for managing gender-based violence risks clear?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| No, they are unclear | Somewhat unclear | Neither clear not unclear | Somewhat clear | Yes – they are clear | Don’t know |

Please explain your answer:

1. **In your view, have considerations regarding climate change impacts been sufficiently clarified in the Standards to ensure the resilience of the project, communities and the environment, or should these requirements be made more explicit in the specific Standards?**

|  |
| --- |
| Yes, these considerations have been sufficiently clarified.  No, these considerations have not been sufficiently clarified and need to be made more explicit  Don’t know |

Please explain your answer:

1. **Although there are some differences with our peer institutions owing to our specific mandates, have the environmental and social requirements for operations outside the European Union been sufficiently aligned with those of other Multilateral Development Banks (MDBs) so that promoters can satisfy our respective requirements without undue burden?**

|  |
| --- |
| Yes, the requirements are sufficiently aligned  No, the requirements are not sufficiently aligned  Don’t know |

Please explain your answer:

1. **Do the Standards give sufficient consideration to the right to privacy and data protection aspects?**

|  |
| --- |
| Yes, the Standards do give sufficient consideration to the right to privacy and data protection  No, the Standards do not give sufficient consideration to the right to privacy and data protection  Don’t know |

Please explain your answer:

1. **Are LGBTIQ-specific risks and impacts addressed adequately in the following Standards?**

|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes – adequately addressed | No – not adequately addressed | Don’t know |
| Standard 2 – Stakeholder engagement |  |  |  |
| Standard 8 – Labour rights |  |  |  |
| Standard 9 – Occupational and public health, safety and security |  |  |  |

If you have answered “No”, please indicate what needs improving:

If you believe any risks and impacts are missing from any other Standard(s) than the three mentioned above, please provide details below:

There are no further questions on cross-cutting issues. If you would like to add anything that is not already covered by the questions in this chapter, you may do so in the box below.

**Additional comments:**

# **Chapter D: Environmental and/or social impacts and risks (Standard 1)**

1. **Are this Standard’s requirements sufficient to satisfy the need for an integrated approach to impact assessment and risk management?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Insufficient | Somewhat insufficient | Neither sufficient nor insufficient | Somewhat sufficient | Sufficient | Don’t know |

Please explain your answer:

1. **Do you see any possible challenges in the implementation of this Standard, for example in view of your local context?**

|  |
| --- |
| Yes, some challenges  No, no challenges  Don’t know |

Please explain your answer:

1. **Are the differences in the requirements for projects inside the European Union and projects outside the European Union clear?**

|  |  |
| --- | --- |
| Yes, the differences in the requirements are clear  No, the differences in the requirements are not clear  Don’t know |  |

Please explain your answer:

1. **For projects inside the European Union, is it clear from paragraphs 5-6 and 9-13 what information needs to be provided to the EIB to demonstrate compliance with EU legislation?**

|  |  |
| --- | --- |
| Yes, it is clear  No, it is not clear  Don’t know |  |

Please explain your answer:

1. **Is there any information that you believe is missing and should be provided to the EIB to demonstrate compliance with EU legislation?**

|  |  |
| --- | --- |
| Yes, some information is missing  No, no information is missing  Don’t know |  |

Please explain your answer:

1. **The EIB is shifting from front loading prescriptive requirements towards a more risk and outcome-based approach to maximise the positive environmental and social impacts.Where and how do you think the EIB, as a bank, can make the biggest difference and where should it therefore focus its efforts:**
2. to ensure the **environmental and social protections that prevent harm** in EIB-financed projects?

Please list up to three key areas:

1. to **allow for the pursuit of environmental and social opportunities**?

Please list up to three key areas:

1. **Will this Standard be effective in maximising positive environmental and social outcomes?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all effective | Slightly effective | Moderately effective | Very effective | Extremely effective | Don’t know |

Please explain your answer:

1. **Outside the European Union, the ‘principles of EU legislation’ apply to the EIB’s projects. The revised Standard spells out what is meant by ‘the principles of EU legislation’ in different areas of legislation (see paragraph 7). Does this description make it sufficiently clear what the Bank’s requirements for projects outside the European Union are?**

|  |  |
| --- | --- |
| Yes, the requirements are clear  No, the requirements are not clear  Don’t know |  |

If you have answered “No”, where and how do you suggest further improving the clarity of the requirements?

There are no further questions on Standard 1. If you would like to add anything on this Standard that is not already covered by the questions in this chapter, you may do so in the box below.

**Additional comments:**

# **Chapter E: Stakeholder engagement (Standard 2)**

*Previously numbered as Standard 10, this Standard has been moved up to Standard 2 to highlight its cross-cutting nature.*

1. **Are the requirements of this Standard clear and attainable, specifically regarding the responsibilities of the promoter and the competent authorities?**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | Not at all | Somewhat | Moderately | Very | Extremely | Don’t know |
| The requirements are clear |  |  |  |  |  |  |
| The requirements are attainable |  |  |  |  |  |  |

Please explain your answer:

1. **Do you see any possible challenges in the implementation of this Standard, in view of your local context?**

|  |  |
| --- | --- |
| Yes, some challenges  No, no challenges  Don’t know |  |

Please explain your answer:

1. **Will this Standard be effective in ensuring transparent and continuous engagement with project stakeholders?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all effective | Slightly effective | Moderately effective | Very effective | Extremely effective | Don’t know |

Please explain your answer:

1. **Are the differences in the requirements for projects inside the European Union and projects outside the European Union clear?**

|  |  |
| --- | --- |
| Yes, the differences in the requirements are clear  No, the differences in the requirements are not clear  Don’t know |  |

Please explain your answer:

1. **Is it sufficiently clear how the level of stakeholder engagement required for a project should be commensurate to its environmental, climate and/or social impacts?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all clear | Somewhat clear | Moderately clear | Very clear | Extremely clear | Don’t know |

Please explain your answer:

1. **Are the requirements related to the identification and prevention of reprisals (see paragraphs 17, 23 and 30) comprehensive?**

|  |  |
| --- | --- |
| Yes, these requirements are comprehensive  No, some elements are missing  Don’t know |  |

Please explain your answer:

1. **Does the concept of “meaningful consultation”, as defined in the Standard, adequately cover all the key elements that are critical for engaging meaningfully with stakeholders?**

|  |  |
| --- | --- |
| Yes, this concept adequately covers all key elements  No, some elements are missing  Don’t know |  |

Please explain your answer:

1. **The potential impacts and risks related to the rights to privacy and data protection are successfully addressed in this Standard.**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Strongly disagree | Disagree | Neither agree nor disagree | Agree | Strongly agree | Don’t know |

Please explain your answer:

There are no further questions on Standard 2. If you would like to add anything on this Standard that is not already covered by the questions in this chapter, you may do so in the box below.

**Additional comments:**

# **Chapter F: Resource efficiency and pollution prevention (Standard 3)**

1. **Is it clear that this Standard seeks to promote the circular economy and best available techniques in EIB-supported projects?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all clear | Somewhat clear | Moderately clear | Very clear | Extremely clear | Don’t know |

Please explain your answer:

1. **Do you see any possible challenges in the implementation of this Standard, for example in view of your local context?**

|  |  |
| --- | --- |
| Yes, some challenges  No, no challenges  Don’t know |  |

Please explain your answer:

1. **Will this Standard be effective in delivering its purpose?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all effective | Slightly effective | Moderately effective | Very effective | Extremely effective | Don’t know |

Please explain your answer:

1. **Do you see any challenges (e.g. regulatory, knowledge-based or financial) in the implementation of the circular economy principle embedded in the Standard?**

|  |  |
| --- | --- |
| Yes, some challenges  No, no challenges  Don’t know |  |

If you have answered “Yes”, please indicate up to three challenges:

1. **How difficult is the application of best available techniques in your local context?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Very difficult | Difficult | Neutral | Easy | Very easy | Don’t know |

If relevant, please list up to three challenges you face in the implementation of best available techniques in your local context:

There are no further questions on Standard 3. If you would like to add anything on this Standard that is not already covered by the questions in this chapter, you may do so in the box below.

**Additional comments:**

# **Chapter G: Biodiversity and ecosystems (Standard 4)**

1. **Is it clear that this Standard is seeking to achieve ‘no net loss’ and ‘a net positive impact’ on biodiversity in EIB-supported projects?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all clear | Somewhat clear | Moderately clear | Very clear | Extremely clear | Don’t know |

Please explain your answer:

1. **Do you see any possible challenges in the implementation of this Standard, for example in view of your local context?**

|  |  |
| --- | --- |
| Yes, some challenges  No, no challenges  Don’t know |  |

Please explain your answer:

1. **Will this Standard be effective in delivering its purpose?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all effective | Slightly effective | Moderately effective | Very effective | Extremely effective | Don’t know |

Please explain your answer:

1. **Given the links between the pandemic and biodiversity loss, what, in your view, could be a practical requirement that could be undertaken by the promoter to avoid conditions at project level that would facilitate the transmission of zoonotic diseases?**
2. **This Standard requires promoters to identify opportunities to enhance biodiversity. The EIB is increasingly exploring nature-based solutions (NBS) and green infrastructure as opportunities to enhance biodiversity in infrastructure projects. Are these useful paths to explore?**

|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes – useful to explore | No – not useful to explore | Don’t know |
| Nature-based solutions |  |  |  |
| Green infrastructure |  |  |  |

Please explain your answer:

1. **Are there any other opportunities to enhance biodiversity through its financial instruments that the EIB should further explore?**

|  |  |
| --- | --- |
| Yes, there are other opportunities  No, the Standard covers them all  Don’t know |  |

If you have answered “Yes”, please list up to three examples:

1. **Are the requirements in areas of critical habitat robust enough?**

*The EIB has strengthened the emphasis on the application of the mitigation hierarchy as the predominant instrument applied in EIB-financed operations, and reiterated that only as a last resort and on an exceptional basis can offsets for critical habitats be accepted (see paragraphs 17-23).*

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all robust | Somewhat robust | Moderately robust | Very robust | Extremely robust | Don’t know |

Please explain your answer:

1. **As a reflection of its commitment to uphold animal welfare standards in its projects, the Bank is due to publish a good practice note on animal welfare for the operations it finances. If you do not believe this to be sufficient, where and how else would you suggest embedding animal welfare requirements?**

*The Bank considers animal welfare to be very important. Where applicable, EIB operations need to be implemented in accordance with the “Five Freedoms” principle as well as comply with Directive 98/58/EC. However, in our view the requirements related to animal welfare do not fully correspond to this Standard, which relates to or promotes biodiversity, ecosystems and ecosystem services. Animal welfare cannot really be classified as living natural resources. Therefore, and while it is important to ensure the welfare of animals in relevant operations, we believe this Standard is not the right place to spell out such requirements.*

1. **Are the requirements for assessing and avoiding or minimising impacts on biodiversity and protected areas sufficient?**

*We believe that the EIB has put in place robust requirements for assessing and avoiding or minimising impacts on biodiversity and protected areas. We have clearly stated in this Standard that we will not finance projects where there is a significant conversion or degradation of high biodiversity value or critical habitat and where there are significant residual impacts on UNESCO World and Natural Sites (see also paragraph 2.5 in the Environmental and Social Policy).*

*We think that these requirements are the most effective way of protecting biodiversity and ecosystems. In contrast, we feel it would be very difficult to achieve the same level of protection through a list of ‘no-go areas’, because it would be almost impossible to ensure that such a list would be complete.*

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Insufficient | Somewhat insufficient | Neither sufficient nor insufficient | Somewhat sufficient | Sufficient | Don’t know |

Please explain your answer:

There are no further questions on Standard 4. If you would like to add anything on this Standard that is not already covered by the questions in this chapter, you may do so in the box below.

**Additional comments:**

# **Chapter H: Climate change (Standard 5)**

1. **Is it clear what this Standard is seeking to achieve?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all clear | Somewhat clear | Moderately clear | Very clear | Extremely clear | Don’t know |

Please explain your answer:

1. **Do you see any possible challenges in the implementation of this Standard, in view of your local context?**

|  |  |
| --- | --- |
| Yes, some challenges  No, no challenges  Don’t know |  |

Please explain your answer:

1. **Will this Standard be effective in delivering its purpose?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all effective | Slightly effective | Moderately effective | Very effective | Extremely effective | Don’t know |

Please explain your answer:

1. **Are the differences in the requirements for projects inside the European Union and projects outside the European Union clear?**

|  |  |
| --- | --- |
| Yes, the differences in the requirements are clear  No, the differences in the requirements are not clear  Don’t know |  |

Please explain your answer:

1. **This Standard is clear in how it supports the Bank’s commitments to decarbonisation and resilience in terms of determining the:**

|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes – it is clear | No – it is not clear | Don’t know |
| Contribution to climate change mitigation and adaptation |  |  |  |
| Alignment of operations with the Paris agreement |  |  |  |
| Project climate risk assessment |  |  |  |

Please explain your answer:

1. **This Standard is sufficiently robust in supporting the Bank’s commitments to decarbonisation and resilience in terms of determining the:**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | Insufficiently robust | Somewhat insufficiently robust | Neither sufficient nor insufficient | Somewhat sufficiently robust | Sufficiently robust | Don’t know |
| Contribution to climate change mitigation and adaptation |  |  |  |  |  |  |
| Alignment of operations with the Paris agreement |  |  |  |  |  |  |
| Project climate risk assessment |  |  |  |  |  |  |

Please explain your answer:

1. **Are references to legislation clear?**

|  |  |
| --- | --- |
| Yes, the references are clear  No, the references are not clear  Don’t know |  |

Please explain your answer:

1. **Given the complex terminology, the EIB has provided a number of definitions in the footnotes of the Standard. Are these sufficient?**

|  |  |
| --- | --- |
| Yes, sufficient definitions have been provided  No, some definitions are missing or incomplete  Don’t know |  |

If you have answered “No”, please clarify which definitions are missing or what needs to be defined more comprehensively:

1. **Are there any elements covered in this Standard that would benefit from more detailed guidance for promoters?**

|  |  |
| --- | --- |
| Yes, additional guidance is required  No, no additional guidance is required  Don’t know |  |

If you have answered “Yes”, please indicate which elements would benefit from more detailed guidance for promoters:

There are no further questions on Standard 5. If you would like to add anything on this Standard that is not already covered by the questions in this chapter, you may do so in the box below.

**Additional comments:**

# **Chapter I: Involuntary resettlement (Standard 6)**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Insufficient | Somewhat insufficient | Neither sufficient nor insufficient | Somewhat sufficient | Sufficient | Don’t know |

1. **Are the Standard’s requirements sufficient to satisfy the need to avoid and mitigate social and economic impacts from unavoidable involuntary resettlement?**

Please explain your answer:

1. **Do you see any possible challenges in the implementation of this Standard, in view of your local context?**

|  |  |
| --- | --- |
| Yes, some challenges  No, no challenges  Don’t know |  |

Please explain your answer:

1. **Will this Standard be effective in improving or at least restoring the socioeconomic and cultural conditions of ‘Project-Affected People’ (PAP)?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all effective | Slightly effective | Moderately effective | Very effective | Extremely effective | Don’t know |

Please explain your answer:

1. **Are the differences in the requirements for projects inside the European Union and projects outside the European Union clear?**

|  |  |
| --- | --- |
| Yes, the differences in the requirements are clear  No, the differences in the requirements are not clear  Don’t know |  |

Please explain your answer:

1. **Does this Standard clearly describe who qualifies as ‘Project-Affected People’ (PAP)?**

|  |  |
| --- | --- |
| Yes, this description is clear  No, this description is not clear  Don’t know |  |

Please explain your answer:

1. **How clear are the EIB’s requirements when the promoter is not the entity responsible for the resettlement (see paragraphs 59-60)?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all clear | Somewhat clear | Moderately clear | Very clear | Extremely clear | Don’t know |

Please explain your answer:

1. **Is the information required for the resettlement reports under Annex 1a (Resettlement Plan & Livelihood Restoration Plan) and Annex 1b (Resettlement Framework) sufficient and clear?**

|  |  |  |
| --- | --- | --- |
|  | Annex 1a | Annex 1b |
| Yes, the information required is sufficient |  |  |
| No, the information required is not sufficient |  |  |
| Yes, the information required is clear |  |  |
| No, the information required is not clear |  |  |

If you have answered “No”, which additional information would you like to see, or what should be clearer, in Annex 1a and/or 1b?

There are no further questions on Standard 6. If you would like to add anything on this Standard that is not already covered by the questions in this chapter, you may do so in the box below.

**Additional comments:**

# **Chapter J:** **Vulnerable groups and Indigenous Peoples (Standard 7)**

1. **Are the requirements of this Standard clear and attainable, specifically regarding the identification of vulnerable persons and/or groups and Indigenous Peoples?**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | Not at all | Somewhat | Moderately | Very | Extremely | Don’t know |
| The requirements are clear |  |  |  |  |  |  |
| The requirements are attainable |  |  |  |  |  |  |

Please explain your answer:

1. **Do you see any possible challenges in the implementation of this Standard, in view of your local context?**

|  |  |
| --- | --- |
| Yes, some challenges  No, no challenges  Don’t know |  |

Please explain your answer:

1. **Will this Standard be effective in protecting the rights and interests of project-affected vulnerable persons and groups and Indigenous Peoples?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all effective | Slightly effective | Moderately effective | Very effective | Extremely effective | Don’t know |

Please explain your answer:

1. **Are the differences in the requirements for projects inside the European Union and projects outside the European Union clear?**

|  |  |
| --- | --- |
| Yes, the differences in the requirements are clear  No, the differences in the requirements are not clear  Don’t know |  |

Please explain your answer:

1. **How clear are the requirements in indicating how the promoter should effectively take into account, and address, the vulnerability of different groups in the operations financed by the EIB?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all clear | Somewhat clear | Moderately clear | Very clear | Extremely clear | Don’t know |

Please explain your answer:

1. **The EIB’s requirements for promoters outlined in this Standard are inclusive, and effectively take into account, and address, the vulnerability of different groups in its operations.**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Strongly disagree | Disagree | Neither agree nor disagree | Agree | Strongly agree | Don’t know |

Please explain your answer:

1. **Does the proposed definition of vulnerable persons and/or groups (see paragraphs 1-4) include the most relevant socioeconomic characteristics that may result in vulnerability?**

|  |  |
| --- | --- |
| Yes, it does include the most relevant characteristics  No, some characteristics are missing  Don’t know |  |

If you have answered “No”, please explain what is missing and how the issue should be addressed:

1. **Are the proposed definition and related identification criteria provided for Indigenous Peoples (see paragraph 10) adequate?**

|  |  |
| --- | --- |
| Yes, they are adequate  No, they are not adequate  Don’t know |  |

If you have answered “No”, please explain what is inadequate:

There are no further questions on Standard 7. If you would like to add anything on this Standard that is not already covered by the questions in this chapter, you may do so in the box below.

**Additional comments:**

# **Chapter K: Labour rights (Standard 8)**

1. **Are the requirements of this Standard clear, specifically regarding the responsibilities of the promoter, (sub)contractors and suppliers?**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | Not at all clear | Somewhat clear | Moderately clear | Very clear | Extremely clear | Don’t know |
| Responsibilities of the promoter |  |  |  |  |  |  |
| Responsibilities of the (sub)contractors |  |  |  |  |  |  |
| Responsibilities of the suppliers |  |  |  |  |  |  |

Please explain your answer:

1. **Do you see any possible challenges in the implementation of this Standard, in view of your local context?**

|  |  |
| --- | --- |
| Yes, some challenges  No, no challenges  Don’t know |  |

Please explain your answer:

1. **Will this Standard be effective in protecting the fundamental labour rights of workers?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all effective | Slightly effective | Moderately effective | Very effective | Extremely effective | Don’t know |

Please explain your answer:

1. **Are the differences in the requirements for projects inside the European Union and projects outside the European Union clear?**

|  |  |
| --- | --- |
| Yes, the differences in the requirements are clear  No, the differences in the requirements are not clear  Don’t know |  |

Please explain your answer:

1. **For projects located in countries that have not ratified or fully transposed ILO Conventions No 87[[1]](#footnote-2) and 98[[2]](#footnote-3) into national legislation, are the requirements regarding the rights to freedom of association and collective bargaining (see paragraphs 36-38) clear and sufficient?**

|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes | No | Don’t know |
| Are the requirements clear? |  |  |  |
| Are the requirements sufficient? |  |  |  |

If you have answered “No”, please explain your answer:

1. **The requirements regarding supply chain workers (see paragraphs 55-59) are understandable and achievable.**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | Strongly disagree | Disagree | Neither agree nor disagree | Agree | Strongly agree | Don’t know |
| Requirements are understandable |  |  |  |  |  |  |
| Requirements are achievable |  |  |  |  |  |  |

Please explain your answer:

There are no further questions on Standard 8. If you would like to add anything on this Standard that is not already covered by the questions in this chapter, you may do so in the box below.

**Additional comments:**

# **Chapter L: Occupational and public health, safety and security (Standard 9)**

1. **Are the requirements of this Standard clear, specifically regarding the responsibilities of the promoter, (sub)contractors and suppliers?**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | Not at all clear | Somewhat clear | Moderately clear | Very clear | Extremely clear | Don’t know |
| Responsibilities of the promoter |  |  |  |  |  |  |
| Responsibilities of the (sub)contractors |  |  |  |  |  |  |
| Responsibilities of the suppliers |  |  |  |  |  |  |

Please explain your answer:

1. **Do you see any possible challenges in the implementation of this Standard, in view of your local context?**

|  |  |
| --- | --- |
| Yes, some challenges  No, no challenges  Don’t know |  |

Please explain your answer:

1. **Will this Standard be effective in protecting the health, safety and security of workers and the community?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all effective | Slightly effective | Moderately effective | Very effective | Extremely effective | Don’t know |

Please explain your answer:

1. **Are the differences in the requirements for projects inside the European Union and projects outside the European Union clear?**

|  |  |
| --- | --- |
| Yes, the differences in the requirements are clear  No, the differences in the requirements are not clear  Don’t know |  |

Please explain your answer:

1. **The Standard includes new requirements to address the spread of pandemics and epidemics (see paragraph 44). Are they comprehensive enough to address the risks arising from projects?**

|  |  |
| --- | --- |
| Yes, the new requirements are comprehensive  No, some elements are missing  Don’t know |  |

If you have answered “No”, please indicate what is missing from these requirements:

1. **The Standard includes new requirements to address the transmission of communicable diseases (see paragraph 44). Are they comprehensive enough to address the risks arising from projects?**

|  |  |
| --- | --- |
| Yes, the new requirements are comprehensive  No, some elements are missing  Don’t know |  |

If you have answered “No”, please indicate what is missing from these requirements:

1. **The Standard includes new requirements to address traffic and road safety (see paragraphs 38-40). Are they comprehensive enough to address the risks arising from projects?**

|  |  |
| --- | --- |
| Yes, the new requirements are comprehensive  No, some elements are missing  Don’t know |  |

If you have answered “No”, please indicate what is missing from these requirements:

1. **The Standard includes new requirements to address Natural Hazards Triggering Technical Accidents (NaTech; see paragraphs 41-42). Are they comprehensive enough to address the risks arising from projects?**

|  |  |
| --- | --- |
| Yes, the new requirements are comprehensive  No, some elements are missing  Don’t know |  |

If you have answered “No”, please indicate what is missing from these requirements:

1. **Does this Standard address all relevant risks for projects financed by the EIB?**

|  |  |
| --- | --- |
| Yes, all risks have been addressed  No, not all risks have been addressed  Don’t know |  |

If you have answered “No”, please indicate which risks have not been addressed, and how you believe they should be addressed:

There are no further questions on Standard 9. If you would like to add anything on this Standard that is not already covered by the questions in this chapter, you may do so in the box below.

**Additional comments:**

# **Chapter M: Cultural heritage (Standard 10)**

1. **Do you agree that this Standard’s requirements satisfy the need to protect cultural heritage from the potential adverse impacts of project activities?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Strongly disagree | Disagree | Neither agree not disagree | Agree | Strongly agree | Don’t know |

Please explain your answer:

1. **Do you see any possible challenges in the implementation of this Standard, in view of your local context?**

|  |  |
| --- | --- |
| Yes, some challenges  No, no challenges  Don’t know |  |

Please explain your answer:

1. **Will this Standard be effective in helping the promoters working with the EIB to identify, assess, manage and monitor impacts and risks affecting cultural heritage?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all effective | Slightly effective | Moderately effective | Very effective | Extremely effective | Don’t know |

Please explain your answer:

1. **Are the differences in the requirements for projects inside the European Union and projects outside the European Union clear?**

|  |  |
| --- | --- |
| Yes, the differences in the requirements are clear  No, the differences in the requirements are not clear  Don’t know |  |

Please explain your answer:

1. **The minimum information required from project promoters under Annex 2 is clear and sufficient.**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | Strongly disagree | Disagree | Neither agree nor disagree | Agree | Strongly agree | Don’t know |
| Requirements are clear |  |  |  |  |  |  |
| Requirements are sufficient |  |  |  |  |  |  |

If there is any additional information you would like to see in Annex 2, please list up to three elements:

There are no further questions on Standard 10. If you would like to add anything on this Standard that is not already covered by the questions in this chapter, you may do so in the box below.

**Additional comments:**

# **Chapter N: Intermediated finance (Standard 11)**

1. **Is it clear what this Standard is seeking to achieve?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all clear | Somewhat clear | Moderately clear | Very clear | Extremely clear | Don’t know |

Please explain your answer:

1. **Do you see any possible challenges in the implementation of this Standard, for example in view of your local context?**

|  |  |
| --- | --- |
| Yes, some challenges  No, no challenges  Don’t know |  |

Please explain your answer:

1. **Is this Standard effective in setting out how environmental and social impacts and risks arising from sub-projects shall be identified, assessed, managed and monitored?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all effective | Slightly effective | Moderately effective | Very effective | Extremely effective | Don’t know |

Please explain your answer:

1. **Are the differences in the requirements for projects inside the European Union and projects outside the European Union clear?**

|  |  |
| --- | --- |
| Yes, the differences in the requirements are clear  No, the differences in the requirements are not clear  Don’t know |  |

Please explain your answer:

1. **Does this Standard adequately reflect the need for transparency, manageable reporting requirements and compliance with confidentiality obligations?**

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | |  | Inadequately | Somewhat inadequately | Neutral | Somewhat adequately | Adequately | Don’t know | | Transparency |  |  |  |  |  |  | | Manageable reporting requirements |  |  |  |  |  |  | | Compliance with confidentiality obligations |  |  |  |  |  |  |   Please explain your answer: |  |

1. **How compatible is this Standard with the legislative framework you operate in?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Not at all compatible | Somewhat compatible | Moderately compatible | Very compatible | Extremely compatible | Don’t know |

Please explain your answer:

1. **Do you see any duplication of and/or overlap with Standards 1-10, or any additional elements to be taken into consideration?**

|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes – there are | No – there are not | Don’t know |
| Duplication? |  |  |  |
| Overlap? |  |  |  |
| Additional elements? |  |  |  |

Please explain your answer:

There are no further questions on Standard 11. If you would like to add anything on this Standard that is not already covered by the questions in this chapter, you may do so in the box below.

**Additional comments:**

# **Chapter O: Additional comments**

If you would like to add anything that is not already covered by the questions above, you may do so in the box below.

**Additional comments:**

|  |
| --- |
|  |

# **Chapter P: About you**

|  |  |
| --- | --- |
| **I am responding as:** | An individual in my personal capacity  The representative of an organisation |
|  |  |
| **First name:\*** |  |
|  |  |
| **Surname:\*** |  |
|  |  |
| **Email address[[3]](#footnote-4):** |  |
| *Please only respond to the next two questions if you have indicated that you are responding on behalf of an organisation.* | |
| **Function:[[4]](#footnote-5)** |  |
|  |  |
| **Organisation name:** |  |
|  |  |
| **Country**[[5]](#footnote-6): |  |

*The information in the fields marked with an asterisk (\*) indicates personal details.*

*Responses to the following four questions (A-D) are for statistical/analytical purposes and will not be published as part of your contribution. They are extremely useful in helping the EIB to understand stakeholders’ profiles and to improve consultation processes going forward. Only the aggregated results will be reported in the consultation report produced at the end of the consultation process.*

**A: Type of organisation (if responding as a representative of an organisation):**

Large enterprise

Micro, small or medium-sized enterprise (SME, i.e. an enterprise which employs fewer than 250 persons and which has an annual turnover not exceeding €50 million, and/or an annual balance sheet total not exceeding €43 million)

Financial institution

Non-governmental organisation

Trade/business/professional association

Public authority (e.g. EU institution, body or agency, national/regional/local government, etc.)

International or supra-national organisation

Consultancy (e.g. professional consultancy, law firm)

Research/think tank (e.g. university, research institute)

Other

|  |  |
| --- | --- |
| Please specify: |  |

**B: How did you hear about this public consultation?**

EIB email/newsletter

EIB social media

EIB website

Press

Colleague

Other

|  |  |
| --- | --- |
| Please specify: |  |

**C: Did you ever engage with the EIB before this public consultation?**

No, this is the first time that I have engaged with the EIB

Yes, as a client

Yes, as a financial intermediary

Yes, as a recipient of an EIB-intermediated loan

Yes, as the representative of a country hosting an EIB-financed project

Yes, as another type of business partner

Yes, as an institutional partner

Yes, as a member of civil society / a non-governmental organisation

Yes, in another capacity (please specify):

**D: How familiar were you with the EIB Statement of Environmental and Social Principles and Standards, and the existing EIB Environmental and Social Standards before this public consultation?**

|  |  |  |  |
| --- | --- | --- | --- |
|  | Very familiar | Somewhat familiar | Not familiar |
| EIB Statement of Environmental and Social Principles and Standards (2009) |  |  |  |
| Standard 1 – Assessment and Management of environmental and social impacts and risks |  |  |  |
| Standard 2 – Pollution prevention and abatement |  |  |  |
| Standard 3 – Biodiversity and ecosystems |  |  |  |
| Standard 4 – Climate-related |  |  |  |
| Standard 5 – Cultural heritage |  |  |  |
| Standard 6 –Involuntary resettlement |  |  |  |
| Standard 7 – Rights and interests of vulnerable groups |  |  |  |
| Standard 8 – Labour standards |  |  |  |
| Standard 9 – Occupational and public health, safety and security |  |  |  |
| Standard 10 – Stakeholder engagement |  |  |  |

# **Chapter Q: Consent**

In accordance with the EIB Group Transparency Policy, the EIB operates under the presumption of disclosure.  For public consultations, this means that the EIB will publish all contributions on the public consultation website at the end of the consultation period. Respondents may nonetheless choose to answer anonymously.

To enable respondents to speak freely without any possible risk of reprisal and to ensure their feedback is meaningful, their answers to all the questions in Chapter B (human rights), as well as question 2 in Chapters D-N (Standard 1-11), will, however, not be automatically published as part of their contributions.

Should you nevertheless wish to have your responses to these specific questions published in the interest of transparency, please explicitly confirm your authorisation for us to do so here.

Please confirm what you authorise the EIB to publish (*this question is mandatory)*:

* Publish my full contribution, including my personal details, my responses to Chapter B (human rights) and to Question 2 in Chapters D-N (Standards 1-11), and my responses to the rest of the consultation
* Do not publish my personal details, but   
  do publish my responses to Chapter B (human rights) and to Question 2 in Chapters D-N (Standards 1-11), and my responses to the rest of the consultation
* Do not publish my responses to Chapter B (human rights) and to Question 2 in Chapters D-N (Standards 1-11) but   
  do publish my personal details and my responses to the rest of the consultation
* Do not publish my personal details or my responses to Chapter B (human rights) and to Question 2 in Chapters D-N (Standards 1-11), but   
  do publish my responses to the rest of the consultation

This is the end of the questionnaire.

Thank you very much for taking the time to help us improve the ESSF.

**END OF CONTRIBUTION**

1. [List of countries that have not ratified C087 - Freedom of Association and Protection of the Right to Organise Convention](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11310:0::NO::P11310_INSTRUMENT_ID:312232) [↑](#footnote-ref-2)
2. [List of countries that have not ratified C098 - Right to Organise and Collective Bargaining Convention](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11310:0::NO:11310:P11310_INSTRUMENT_ID:312243:NO) [↑](#footnote-ref-3)
3. Your email address will not be published. [↑](#footnote-ref-4)
4. Your function will not be published. [↑](#footnote-ref-5)
5. Country of residence, if answering as an individual; or country of the organisation’s head office, if answering on behalf of an organisation. [↑](#footnote-ref-6)