

Draft new EIB-CM Policy

Issues Matrix

Draft – 2 September 2026



This issues matrix provides a consolidated overview of the contributions to the public consultation on the draft new EIB Group's Complaints Mechanism (EIB-CM) Policy, together with reasoned comments on the contributions.

The contributions are published on the [public consultation website](#), unless contributors did not consent to the publication. In such case, the contribution is referred to as "anonymous" in the below matrix.

The issues matrix reflects the structure of the consultation questionnaire. It summarises responses to the questions of the consultation questionnaire, as well as contributions received via email. Main contributions raised during the public consultation meetings and not received in writing are also reflected in the issues matrix.

All issues that specifically refer to particular EIB financed projects or EIB-CM cases were excluded from this document as they fall outside the scope of the public consultation on the draft new EIB-CM Policy. Project-specific issues can be addressed to the EIB Infodesk (Infodesk@eib.org) and EIB-CM case specific questions can be addressed to the EIB-CM (complaints@eib.org).

Contents

RESUME

General.....	5
Question 1 – Please provide any general comments on the draft new EIB-CM Policy.	5
Preamble	9
Question 2 -Please provide your comments on the Preamble of the draft new EIB-CM Policy.	9
Section I – Mandate, Principles and General Provisions	10
Question 3 – Please provide your comments on Section I – Mandate, Principles and General Provisions of the draft new EIB-CM Policy?	10
Section II – Environmental and/or Social Complaints.....	19
Question 4 – Submission and Admissibility : please provide your comments on the provisions related to the submission and admissibility of environmental and social complaints under the draft new EIB-CM Policy.....	19
Question 5 – Early Resolution: Please provide your comments on the provisions related to early resolution of environmental and social complaints under the draft new EIB-CM Policy.....	29
Question 6 – Dispute Resolution: Please provide your comments on the provisions related to dispute resolution for environmental and social complaints under the draft new EIB-CM Policy. .	33
Question 7– Compliance: Please provide your comments on the provisions related to compliance reviews of environmental and social complaints under the draft new EIB-CM Policy.....	38
Section III – Access to Information Complaints	48
Question 8– Submission and admissibility: Please provide your comments on the provisions related to the submission and admissibility of access to information complaints under the draft new EIB-CM Policy.	48
Question 9 – Screening : Please provide your comments on the provisions related to the screening of access to information complaints under the draft new EIB-CM Policy?	50
Question 10 – Early Resolution: Please provide your comments on the provisions related to early resolution of access to information complaints under the draft new EIB-CM Policy.....	51
Question 11– Compliance: Please provide your comments on the provisions related to compliance reviews of access to information complaints under the draft new EIB-CM Policy.....	52
Section IV – Other roles and activities	53
Question 12– Advisory: Please provide your comments on the provisions related to the advisory role of the EIB Group Complaints Mechanism under the draft new EIB-CM Policy.....	53
Question 13– Outreach: Please provide your comments on the provisions related to outreach activities of the EIB Group Complaints Mechanism under the draft new EIB-CM Policy.....	54
Question 14– Cooperation with other IAMs: Please provide your comments on the provisions related to cooperation between the EIB Group Complaints Mechanism and other Independent Accountability Mechanisms under the draft new EIB-CM Policy.	56
Question 15– Reporting : Please provide your comments on the provisions related to reporting activities of the EIB Group Complaints Mechanism under the draft new EIB-CM Policy.....	58

Section V – Final provisions	59
Question 16– Please provide your comments on the final provisions of the draft new EIB-CM Policy.....	59
Annex	61
Question 17– Please provide your comments on the annex to the draft new EIB-CM Policy.	61

DRAFT

General

Question 1 – Please provide any general comments on the draft new EIB-CM Policy.

Ref	Summary of Contributions	Contributor	Response
1.	It was noted that, while the draft Policy introduces positive elements—such as greater focus on environmental and social impacts, clearer procedures, and expanded use of dispute resolution—it does not sufficiently address key structural aspects, including independence, remedy, enforcement, accessibility, and timeliness. Concerns were also raised about alignment with international standards (notably the UNGPs), persistent gaps in remedy delivery, and the absence of provisions addressing complaints involving children as rights-holders.	Save the Children (general comment)	The draft new EIB-CM Policy states that the mandate of the EIB-CM includes to facilitate access to remedy. This is materialised by the introduction of elements, such as management action plans (SRAP), enhanced use of Dispute Resolution, the possibility of Early Resolution (when justified) and a better-defined monitoring mandate. The draft new EIB-CM Policy also includes clear timelines for procedural steps (such as the preparation of reports or of management action plans). Additional timelines have been introduced in response to feedback received during the public consultation (e.g. for admissibility and screening). The EIB-CM continues to be very accessible. The draft new EIB-CM Policy aligns with the UN principles on business and human rights and further references to these important principles have been added in response to the feedback received during the public consultation. Any complaint involving children as part of people affected by EIBG projects can be submitted to the EIB-CM. The draft new EIB-CM Policy includes provisions as well in relation to the risk of reprisals. The Guiding Principles section of the draft new EIB-CM Policy contains a provision that the EIB-CM's processes shall take into account the different needs and vulnerabilities. These include the different needs and vulnerabilities of children.

Ref	Summary of Contributions	Contributor	Response
2.	The EIB-CM Policy should establish an active transparency and full proactive disclosure policy for projects financed by the EIBG.	Mupan - Women in Action in the Pantanal/Wetlands International Brazil (proposal 2)	The issues raised fall under other EIBG Policies and cannot be addressed in the draft new EIB-CM Policy. The new EIB-CM Policy governs the work of the EIB-CM including its work on assessing compliance of the project with the below indicated requirements.
3.	The EIB-CM Policy should require mandatory cumulative and synergistic impact assessments for projects within the same ecological or territorial systems prior to disbursement, regardless of whether a complaint has been filed.	Mupan - Women in Action in the Pantanal/Wetlands International Brazil (proposal 7)	Transparency falls under the scope of the EIBG Transparency Policy and EIF Transparency Policy. The EIBG Transparency Policy is scheduled for review in 2027, and we invite you to contribute to this process with your comments.
4.	The EIB-CM Policy should make financing conditional on prior, free, and informed consultation with affected communities, including clear documentation of their input and how it influenced decision-making, with full compliance with FPIC standards for Indigenous peoples.	Mupan - Women in Action in the Pantanal/Wetlands International Brazil (proposal 8)	Requirements regarding impact assessments, stakeholder engagement, and the rights of Indigenous communities are all governed by the EIB 2022 Environmental and Social Standards.
5.	The EIB-CM Policy should integrate climate considerations into project eligibility and monitoring by assessing greenhouse gas emissions, transition risks, and alignment with the Paris Agreement, while enabling the EIB-CM to handle complaints related to climate impacts.	Mupan - Women in Action in the Pantanal/Wetlands International Brazil (proposal 9)	The EIB's strategy and commitments related to climate are described in the Climate Bank Roadmap.
6.	Policy is a mix between a policy and a procedures document, which may confuse some stakeholders, and triggers the question: will the 2018 Procedures be updated? Why doesn't the Policy contain an option to defer investigation like CAO?	Marjanne Servenant	The approach was changed further to the feedback received during the public consultation. Some procedural elements were added to the draft new EIB-CM Policy so that it can fully replace the 2018 Policy and Procedures and to have only one public-facing document. This approach will make it easier for the public to understand the rules governing the EIB-CM. The new EIB-CM Policy will enter into force after approval on the date of its publication on the EIB website], instead of making its entering into force subject to the approval of procedures.

Ref	Summary of Contributions	Contributor	Response
			The novelty in the EIB-CM process is the Early Resolution process (which is akin to the CAO referral), which will provide an opportunity early on in the process for the EIBG Services to resolve the complaint. After that point, and once a complaint enters into the standard case-handling (dispute resolution or compliance), the process is managed directly by the EIB-CM, in order to preserve the independence and transparency of the process.
7.	Recommendations for the CM: 1. Preserve and Strengthen a Child-, Youth - and Community-Centered Approach (ensure CM accessibility for communities, esp. those including children; ensure CM hires experts to help conduct investigations and DR processes involving children, CM to report on citizen engagement quality and integrate social accountability approaches into grievance and monitoring processes) 2. Strengthen Accessibility in Fragile and Conflict-Affected Contexts (ie increase outreach in these contexts, ensure use of expertise in children's rights, GBV and conflict sensitivity) 3. Considering the number of complaints received, esp. outside EU, ensure adequate resourcing for the CM.	World Vision EU Representation	Upholding children's rights is of utmost importance. In case of any complaint involving children as complainants or as part of people affected by EIBG projects, the EIB-CM will endeavour to hire experts to ensure that the EIB-CM processes follow a child-centered approach. The same is true with regards to gender-based violence and the use of a survivor-centered approach. This is underpinned by constant upskilling of the staff part of the EIB-CM to ensure they have the required skills to handle especially sensitive cases. According to the draft new EIB-CM Policy, the EIB-CM will develop an outreach strategy. The importance of conducting outreach in fragile and conflict states is duly noted and will be therein reflected to the extent applicable. With regards to budget, the draft new EIB-CM Policy provides that <i>"The EIBG Governing Bodies shall ensure that adequate resources and budget are provided to the EIB-CM so that it may be effective in delivering on its mandate, performing its functions, and carrying out its activities in a timely manner and as per the provisions of this Policy"</i> (Paragraph 18).
8.	The contributor argues that the policy should distinguish more clearly between complaints about internal EIB-CM rules and procedures and complaints concerning projects or advisory activities, and suggests separate procedures for these different concerns.	Dr Lucien Peters	The draft new EIB-CM Policy focuses the new mandate of the mechanism on assessing the negative environmental and/or social impacts of EIBG projects and complainants should allege having been directly or indirectly negatively impacted (or likely to be negatively impacted) by an EIBG project or Project considered for financing. Complaints can include

Ref	Summary of Contributions	Contributor	Response
			allegations concerning advisory activities, provided these are linked to a project financed by the EIBG. Other complaints will be handled by the relevant services of the EIBG Office of Ethics and Accountability, formerly the Inspectorate General. Complaints in relation to the EIB-CM work or its rules can be submitted to the European Ombudsman.

Preamble

Question 2 -Please provide your comments on the Preamble of the draft new EIB-CM Policy.

Ref	Summary of Contributions	Contributor	Response
1.	Include the right to effective and timely remedy in paragraph 5, as this is a core tenet of international human rights law.	Joint CSO Comments (comment 1)	The draft new EIB-CM Policy was revised to include the EIBG's commitment to ensure the right to complain in view of seeking remedy (See Paragraph 8, previously paragraph 5).
2.	Include a reference to para 35 in para 6 to explain what type of complaints are dealt with by other Services.	Marjanne Servenant	The reference is already provided in paragraph 9 (previously paragraph 6) of the draft new EIB-CM Policy.
3.	Can "Project considered for financing" be explained by adding in what phase of the project we are?	Marjanne Servenant	The definition of Project considered for financing is included in the Definitions section and relates to projects that are under appraisal and not yet approved for financing by the EIBG Governing Bodies.
4.	The contributor considers the revised mandate better aligned with expectations and more focused on significant E&S complaints, but asks for clearer explanation of what the access to information mandate covers and how it relates to EIB-CM functions.	Agence Francaise de developpement (AFD)	The access-to-information mandate covers any allegations of non-compliance by an EIBG entity with Access to Information policies and procedures (namely, the EIBG Transparency Policy and the EIF Transparency Policy). These policies and procedures regulate how the EIBG discloses and/or gives access to information held and/or published by the EIBG entities. In case of an admissible complaint concerning access-to-information issues, the EIB-CM can either consider an Early Resolution or perform a compliance review that can lead to recommendations issued for the EIBG Services to address any identified non-compliances.

Section I – Mandate, Principles and General Provisions

Question 3 – Please provide your comments on Section I – Mandate, Principles and General Provisions of the draft new EIB-CM Policy?

Ref	Summary of Contributions	Contributor	Response
1.	A need for clearer reference to the EIB's commitment to human rights, including alignment with international standards such as the UN Guiding Principles on Business and Human Rights, was highlighted.	Laure-Anne Courdesse and Margaret Wachenfeld Save the Children (2.1) Marianne Servenant Eng. Abdiaziz Ibrahim Sheikh	The Project-related policies and procedures which are defined in the draft new EIB-CM Policy include the EIB Environmental and Social Sustainability Framework (ESSF) as well as other policies and processes of the EIB Group. The ESSF as well as other policies include the terms of the EIBG's commitment to human rights. Paragraph 6 in the Preamble refers to the EIBG responsibility to comply with EU law and policies and paragraph 7 now refers explicitly to the EU Charter of Fundamental Rights. Paragraph 8 in the Preamble refers to EIBG wide responsibility to manage complaints and to ensure the right to be heard and to complain to EIBG stakeholders whenever they are, or feel, affected by the EIBG entities' decisions, actions or omissions, including failure to comply with any rule or principle that is binding upon them and failure to comply with human rights. The above notwithstanding, the text was adapted further to the feedback received during the public consultation and now includes references to the UN Guiding Principles on Business and Human Rights.
2.	A concern was raised that the distinction between addressing non-compliance and facilitating access to remedy for environmental and social impacts or harm to people or the environment is unclear, potentially blurring their respective meanings; clarifying this distinction in the wording of paragraph 11b of the Policy was suggested.	Laure-Anne Courdesse and Margaret Wachenfeld	Making a distinction between addressing non-compliance and facilitating remedy is key. The text of Paragraph 64 was adapted to indicate that the Compliance function, where appropriate, makes recommendations to the EIBG to address non-compliance <i>and</i> facilitate remedy.

Ref	Summary of Contributions	Contributor	Response
			The text of Paragraph 11 was also adapted, taking into account that it covers both E&S and Access to information complaints.
3.	A gap was identified in the Guiding Principles paragraph 13, notably the absence of a reference to “rights-compatibility,” and its inclusion—aligned with international human rights standards such as the UNGPs article 31—was suggested.	Laure-Anne Courdesse and Margaret Wachenfeld	The text was adapted and now includes several references to the UNGPs.
4.	The draft Policy’s Guiding Principles (para. 13) fail to explicitly include rights compatibility, a key effectiveness criterion under the UN Guiding Principles on Business and Human Rights. Given that the EIB, as an EU institution, is bound by the EU Charter of Fundamental Rights, the CM Policy should clearly reflect a rights-based approach.	Joint CSO Comments (comment 1)	
5.	Concerns were raised that the draft Policy does not provide a sufficiently clear and effective framework for remedy, with risks that findings may not translate into tangible outcomes for affected communities. It was suggested to strengthen the articulation of remedy, including types of measures, the systematic inclusion of remedy actions in findings, and improved monitoring and engagement with communities to ensure delivery.	Save the Children (2.4)	
6.	The comment welcomes the shift toward impact-based accountability but calls for a stronger focus on human rights and community-level harm, and for ensuring that remedies address actual impacts rather than only procedural compliance.	Eng. Abdiaziz Ibrahim Sheikh	
7.	Concerns were raised that the draft Policy does not adequately address governance and structural issues identified in the External Review, particularly regarding reporting lines,	Laure-Anne Courdesse and Margaret	The EIB-CM is located within the independent EIBG Office of Ethics and Accountability (formerly, the Inspectorate General), along with the Evaluation and Investigations functions, both of

Ref	Summary of Contributions	Contributor	Response
	hierarchical seniority and appointment of head of mechanism, conflict of interest safeguards, and budget authority. It was noted that additional measures may be needed to ensure sufficient independence, including strengthening the role of governing bodies and other safeguards to align more closely with practices of other IAMs.	Wachenfeld Urgewald Save the Children (2.1)	which are headed by heads of division. The EIBG also notes the specific EU institutional context, including external oversight mechanisms (EO, EUCJ) which other IFIs and IAMs do not have. This is also now expressly provided for in the new paragraph 22. Strict Bank-wide conflict-of-interest rules prevent staff from handling cases where staff would be conflicted, e.g. by prior operational involvement. Further, paragraph 22 was adapted to provide that EIB-CM staff shall “ <i>exercise their functions with independence, objectivity, and impartiality, avoiding conflicts of interest and undue influence, and ensuring that their assessments and conclusions are based on relevant and substantiated information</i> ”.
8.	Concerns were raised that the draft Policy lacks key structural safeguards to ensure institutional independence, including provisions on transparent and merit-based selection, fixed terms, and pre- and post-employment restrictions; the introduction of such measures was suggested to strengthen independence and public trust.	IAM professional Urgewald Anonymous	The Head of the EIB-CM is appointed following a structured, merit-based process led by the Group Chief Ethics and Accountability Officer (formerly, the Inspector General), including external assessments and formal appointment by the President. A provision was also added to indicate that “ <i>the EIB Board of Directors and the EIF Board of Directors are consulted on the selection process of the Head of the EIB-CM</i> ”.
9.	Concerns were raised that the Policy does not sufficiently clarify the oversight role of the EIB and EIF Boards, including their responsibilities for safeguarding the independence and effectiveness of the EIB-CM, overseeing implementation of recommendations and SRAPs, and addressing disagreements with Management. Greater clarity on the Boards’ role across key stages of the process and in governance functions (e.g. appointments and budget approval) was suggested.	IAM professional	In terms of the oversight role of the EIB and EIF Boards, paragraph 17 now indicates that “ <i>the governance, mandate, and independence of the EIB-CM are safeguarded by the EIB Board of Directors and the EIF Board of Directors</i> ” and paragraph 24 was adapted to indicate that “ <i>during the handling of a Complaint, the Head of the EIB-CM or the Group Chief Ethics and Accountability Officer may address the EIBG Governing Bodies when deemed necessary with specific recommendations</i> ”.
10.	Concerns were raised about the adequacy of resources and staffing for the EIB-CM, as reportedly several interested parties have raised that the Mechanism is understaffed, with suggestions to strengthen provisions ensuring sufficient resourcing, including a process whereby the Head of the EIB-CM proposes the required budget for approval by the Board of Directors.	Anonymous	

Ref	Summary of Contributions	Contributor	Response
11.	The provisions on budgetary resources should be equivalent to those included in the EIBG Evaluation Policy.	Joint CSO Comments (section VI)	In terms of budgetary resources and the role of the Board, paragraph 18 of the draft new EIB-CM Policy was adapted to indicate that <i>“the resources and budget of the EIB-CM shall be approved by the EIB Board of Directors and EIF Board of Directors. The EIBG Governing Bodies shall ensure that adequate resources and budget are provided to the EIB-CM so that it may be effective in delivering on its mandate, performing its functions, and carrying out its activities in a timely manner and as per the provisions of this Policy”</i> . Finally, it was clarified that the EIB-CM reports to the EIBG Governing Bodies (rather than informing them). Additionally, a mid-term review is foreseen to analyse how the new refocused mandate of the EIB-CM and the new Policy have impacted the EIB-CM (including resources and budget) and extract conclusions therefrom.
12.	The EIB-CM should have a dedicated and independently managed budget line, insulated from the EIB operational services.	Hamu Geredo, New Planet Alliance (section 2.1)	It should however be noted that EIBG Board of Directors differs from other IFI's boards, in that it is not a resident Board and its members share their time with their work at the respective Ministries of Finance of EU member Countries.
13.	The draft EIB-CM Policy should provide stronger guarantees of the EIB-CM's independence. The draft Policy lacks clear provisions on how leadership and staff are selected and reviewed to safeguard impartiality. It supports introducing conflict-of-interest rules and cooling-off periods, as well as fixed-term appointments, to strengthen trust and prevent undue influence. The EIB-CM should be adequately resourced and have a budget autonomy, with oversight by the Board of Directors. The feedback from external stakeholders and complainants on enhancing transparency, accountability, and confidence in the mechanism's leadership and performance should be taken into account.	Joint CSO Comments (section II)	Finally, a provision has been added establishing that the EIB-CM will regularly collect feedback on the way it handles complaints and performs the other functions defined in the EIB-CM Policy, and will take such feedback into account to improve its performance (paragraph 125).
14.	The comment highlights concerns about the limited operational independence of the Complaints Mechanism. It calls for strengthening its institutional independence from operational services, including clearer safeguards against internal influence and stronger reporting lines to governing bodies.	Eng. Abdiaziz Ibrahim Sheikh	The statement in paragraph 23 according to which: <i>“the EIB-CM (...) has the right to obtain access to any and all information necessary for the performance of its duties.”</i> is clear and by default covers all operations of the EIBG. Additionally, paragraph 118 states that the EIB-CM is subject to the EIBG Transparency Policy and the EIF Transparency
15.	It was suggested to clarify that the EIB-CM's access to information covers Financial Intermediary operations, including intermediary–client arrangements, and to ensure that confidentiality provisions do not impede such access; relocating this clarification to a strengthened access to information section was also proposed.	Laure-Anne Courdesse and Margaret Wachenfeld	

Ref	Summary of Contributions	Contributor	Response
			Policy, which means that confidentiality requirements cannot be opposed to the EIB-CM when accessing information since the mechanism is, itself, bound to comply with them in the terms of those policies.
16.	Concerns were raised about inconsistencies between the guiding principles (para. 13b) and access to information provisions (para 115), particularly in relation to alignment with the EIB/EIF Transparency Policies and international standards. It was noted that key elements, such as a presumption of disclosure of environmental and social information, are not explicitly reflected, and that the concept of “reasonable access” to information, advice, and expertise lacks clarity. Greater coherence and clearer safeguards for complainants’ access to information were therefore suggested.	Laure-Anne Courdesse and Margaret Wachenfeld	Reference to the EIBG and EIF Transparency Policies is understood to encompass the principles and international frameworks on which they are based (including the presumption of disclosure and relevant conventions). In the interest of maintaining a concise and focused Policy, and to avoid overlap with existing Bank policies, the draft new EIB-CM Policy does not replicate or further elaborate on these elements. In line with established practice, while the EIB-CM ensures transparent reporting of its activities and findings, requests for access to information are handled in accordance with the applicable Transparency Policies by the respective EIBG team. In this context, the EIB-CM acts within the framework of these policies and does not interpret or apply them independently.
17.	In respect to paragraph 21, the draft EIB-CM Policy suggests that during the handling of the Complaint, the EIB-CM Head may not address the EIB Management Committee without authorisation of the Inspector General.	Joint CSO Comments (section II)	The provision was meant to read that either the Head of the EIB-CM or the Group Chief Ethics and Accountability Officer (formerly the Inspector General) can address the EIB Management Committee and the EIF Chief Executive. However, to clarify and considering this comment, paragraph 24 was adjusted and now reads: “ <i>During the handling of a Complaint, the Head of the EIB-CM or the Group Chief Ethics and Accountability Officer may address the EIBG Governing Bodies when deemed necessary with specific recommendations</i> ”.

Ref	Summary of Contributions	Contributor	Response
18.	The comment highlights the absence of a clear fast-track mechanism for urgent or high-risk cases, noting that delays may lead to irreversible harm. It calls for the introduction of an expedited procedure with shorter timelines and the possibility for the CM to recommend immediate corrective measures, including, where necessary, temporary suspension of activities.	Save the Children (3.2)	Timely handling of urgent or high-risk situations is critical and the draft new EIB-CM Policy already provides avenues to address such concerns. In particular, where appropriate and subject to defined criteria, complaints may be handled through Early Resolution led by the EIBG Services, allowing for a more expedited response to issues. In addition, the draft new EIB-CM Policy foresees that, during the handling of a complaint, the EIB-CM may bring specific issues to the attention of the EIBG Governing Bodies, where deemed necessary by the Head of the EIB-CM or the Group Chief Ethics and Accountability Officer (formerly the Inspector General), including through specific recommendations. This provides a channel to escalate matters of concern where warranted. Furthermore, throughout the complaints process, EIBG Services remain responsible for project implementation and may take action as needed, including strengthening monitoring efforts and engaging with the promoter to address issues identified through complaints. Together, these elements enable the timely consideration and handling of risks within the existing framework. The adoption of immediate corrective measures is the responsibility of the relevant project promoter/client, under monitoring of the EIBG Services.
19.	Concerns were raised that the draft Policy narrows the definition of maladministration, potentially excluding certain complaints and reducing access to accountability. It was suggested to broaden the approach by including harm-based complaints—covering environmental, social, and human rights impacts—and to align with established standards such as those of the European Ombudsman.	Save the Children (2.2)	The draft new EIB-CM Policy intentionally shifts the focus from maladministration- compared to the previous Policy, and which falls primarily within the remit of the European Ombudsman - towards facilitating access to remedy for affected stakeholders in relation to environmental and social impacts of EIB-financed projects. This is in line with the recommendations of the External Review.

Ref	Summary of Contributions	Contributor	Response
			In this context, the draft new EIB-CM Policy expands and balances the range of available processes, including Early Resolution, Dispute Resolution, and the development of a Services Response Action Plan (SRAP) following findings of non-compliance, with a view to supporting the effective remedy of impacts. At the same time, the draft new EIB-CM Policy maintains the ability for the EIB-CM to assess the role of the EIB in cases where environmental and social impacts and related non-compliances are identified, including whether the Bank has carried out its appraisal and monitoring in line with applicable project-related policies and procedures. All other complaints that were under the mandate of the EIB-CM in accordance with the 2018 EIB-CM Policy will continue to be handled by the EIBG, through the services of the Office of Ethics and Accountability (formerly the Inspectorate General). Additionally, complainants will continue to have access to the European Ombudsman. As such, there is no narrowing of accountability of the EIBG.
20.	The EIB-CM should have autonomy over its case selection and procedural decisions and its staff should be protected from retaliation.	Hamu Geredo, New Planet Alliance (section 2.1)	The EIB-CM has autonomous and full control over the admissibility decision (“case selection”). There is no outside interference in respect to this decision. Furthermore, the level of autonomy in respect to procedural decisions is comparable to other IAMs. The EIB-CM staff are EIB staff and are subject to the same protection regime as all EIB staff. More information on this is available in the Staff Regulations and here.
21.	The comment highlights that, although the Policy includes commitments on protection against retaliation, it lacks concrete operational safeguards. It raises concerns about risks faced by complainants and calls for stronger measures, such as systematic reprisal risk assessments, options for	Save the Children (2.8)	The draft new EIB-CM Policy already establishes key principles and operational elements with regards to risks of reprisals. It emphasises that complainants and other individuals associated with a complaint must be able to engage freely with the EIB-CM, without external manipulation,

Ref	Summary of Contributions	Contributor	Response
	confidential or anonymous complaints, rapid response mechanisms, and clearer obligations on clients to prevent retaliation.		interference, coercion or intimidation, and that both the EIBG and the EIB-CM maintain zero tolerance towards reprisals. The EIB-CM takes allegations of reprisals seriously and follows up on them as appropriate.
22.	Anonymity protections should be maintained for complainants who face risk of reprisal.	Hamu Geredo, New Planet Alliance (section 3.1)	Paragraphs 16(c) and (g) and 32 of the draft new EIB-CM Policy contain provisions providing the general framework against reprisals. More information about the EIB-CM's approach to preventing and addressing reprisals is available at: EIB Group Complaints Mechanism's approach to preventing and addressing reprisals . The EIB-CM will continue to strive to further improve its practices in this area.
23.	As a protection against retaliation, the EIB-CM should establish a proactive monitoring mechanism that can trigger protection measures without requiring a formal complaint, particularly in high-risk regions for environmental defenders. It proposes safeguards such as secure reporting channels, identity protection, and contractual obligations for borrowers, with enforcement measures including suspension of financing in cases of non-compliance. This is justified by the persistent violence and reprisals against environmental defenders—especially in countries like Brazil—and the reluctance of affected communities to report violations due to fear, underscoring the need for stronger, preventive protection systems aligned with international standards.	Mupan - Women in Action in the Pantanal/Wetlands International Brazil (proposal 3)	Finally, paragraph 28 of the draft new EIB-CM Policy expressly guarantees complainants the right to maintain confidentiality, if requested.
24.	Third-party representatives (including NGOs acting on behalf of communities who cannot submit directly) should be explicitly permitted to file complaints without burdensome procedural requirements.	Hamu Geredo, New Planet Alliance (section 3.1)	Paragraph 26(a) allows authorised representatives to file a complaint. Paragraph 26(b) extends this right to all CSOs alleging negative environmental impacts. In respect to social impacts, CSOs are also allowed to submit a complaint. In the latter case, the only requirement is for the CSO to explain the reasons preventing any affected people from directly submitting the complaint. No additional procedural requirements exist.
25.	The EIB-CM should be able to recommend proportionate interim measures (e.g. suspending disbursements or project activities) where there is a plausible risk of serious or	Mupan - Women in Action in the Pantanal/Wetlands	The relevant mechanisms are included in the draft new EIB-CM Policy: paragraph 24 authorises the Head of the EIB-CM or the Group Chief Ethics and Accountability Officer (formerly the Inspector General) to address the EIBG Governing Bodies when deemed necessary and this can be done in case of the

Ref	Summary of Contributions	Contributor	Response
	irreversible harm, particularly in environmentally sensitive areas.	International Brazil (proposal 1)	need for interim measures. Additionally, the EIB-CM accepts complaints in relation to projects that are not yet approved for financing (paragraph 36). The adoption of immediate corrective measures is the responsibility of the relevant project promoter/client, under monitoring of the EIBG Services.
26.	Do the complementary functions described in para 11 constitute separate teams (with Chinese walls)?	Marianne Servenant	Dispute Resolution and Compliance are indeed two separate teams within the EIB-CM, which operate with an ethical wall (i.e. the Dispute Resolution team will keep confidential any information collected during the process which the parties would not want to share with the Compliance team). This is especially relevant when cases are transferred from Dispute Resolution to Compliance. For advisory and outreach, the EIB-CM has dedicated staff, that work together with the staff in both Dispute Resolution and Compliance.
27.	Suggestion to add in the Guiding principles of the Policy that CM does not have judicial authority and does not replace courts and to mention that the EIB does not have a management led grievance mechanism.	Marianne Servenant	The text was adapted to take the comment regarding the absence of judicial authority into account. The introduction of management-level mechanism is a decision that requires further discussion at the EIBG-level and involves considerations that go beyond the scope of the EIB-CM mandate.
28.	Paragraph 10 describing the EIB-CM's mandate should also refer to increased access to information.	Brussels public consultation meeting 28/04	The text of paragraph 13(e) was adapted accordingly.

Section II – Environmental and/or Social Complaints

Question 4 – Submission and Admissibility: please provide your comments on the provisions related to the submission and admissibility of environmental and social complaints under the draft new EIB-CM Policy.

Ref	Summary of Contributions	Contributor	Response
1.	Concerns were raised about the limited and unclear provisions, including lack of guidance for complainants, ambiguity on the level of project concerned, and the use of an unclear “materiality” test. Roots Advisory suggested to align the approach with international standards, notably the UNGPs, by assessing the EIB’s linkage to impacts based on factors such as the extent to which its financing enabled or contributed to risks, the foreseeability of impacts, and the effectiveness of due diligence and mitigation measures.	Laure-Anne Courdesse and Margaret Wachenfeld	This has been further examined during the consultation process. The analysis highlighted that, despite existing reporting obligations of financial intermediaries (FIs) to the EIB and EIF regarding the use of proceeds and final beneficiaries, situations may arise where the materiality of the financing needs to be assessed. This may notably be the case for investments involving final beneficiaries such as financial institutions or parent companies with links to sub-projects that are subject to a complaint.
2.	It was noted that the Policy lacks clear criteria for assessing admissibility in cases of indirect financing, particularly in sub-financing arrangements, and may not sufficiently address how affected stakeholders are informed of the EIB’s involvement and their access to the complaints mechanism; further clarification on materiality thresholds and information obligations was suggested.	Anonymous	The paragraph was further clarified in line with the criteria applied by the Compliance Advisor Ombudsman (CAO). Deadlines referred to in paragraph 33 (d) apply to all complaints, including those involving Financial Intermediaries. Regarding the reference to the UN Guiding Principles on Business and Human Rights (UNGP) materiality test - particularly in relation to the foreseeability of impacts and the effectiveness of due diligence and mitigation measures - these aspects would be assessed during the compliance phase, in light of the applicable EIB project-related policies and procedures.
3.	In respect to paragraph 32 of the draft EIB-CM Policy, for the benefit of transparency, predictability, and consistency of practice, we urge clarification on the “materiality” assessment. The proposed text is modelled after that of CAO. Also, the timelines set out in paragraph 30 should apply to operations involving financial intermediaries.	Joint CSO Comments (section IV) Marjanne Servenant	Transparency in relation to financial intermediary (FI) operations and access to information for affected stakeholders is key. While this is a relevant consideration, it is primarily

Ref	Summary of Contributions	Contributor	Response
4.	Materiality provision should be clarified.	Hamu Geredo, New Planet Alliance (section 4)	governed by the EIBG ESSF (which includes an obligation on EIBG clients to make available information about the existence of the EIB-CM), the EIBG and EIF Transparency Policies and related frameworks, rather than the draft new EIB-CM Policy.
5.	The draft CM Policy raises concerns that requiring complaints to be submitted in an EU official language may create confusion and barriers, particularly for non-EU communities, despite the Policy's stated flexibility in accepting other languages.	Joint CSO Comments (comment 8)	Considering this comment, paragraph 28 was adjusted. It is not a requirement of admissibility for the complaint to be in an EU official language.
6.	Submissions should be accepted in any language, with the EIB bearing the cost of translation.	Hamu Geredo, New Planet Alliance (section 3.1)	
7.	There should be a simplified intake form and dedicated helpdesk for guidance to prospective complaints. The complaints should be able to be submitted digitally and non-digitally.	Hamu Geredo, New Planet Alliance (section 3.2)	While the complaints must be submitted in writing (paragraph 28), they may be submitted digitally and non-digitally. The form is available on the EIB-CM website, and the complainants may always reach out to the EIB-CM for assistance. There are flyers in EIB external offices explaining the work of the EIB-CM. These are also distributed as part of EIB-CM outreach activities.
8.	Additional guidance for users could improve its effectiveness. Including links or references to examples of admissible complaints, as well as clarifying the type of information investigators typically require, would likely help complainants provide more complete and relevant submissions	International Organisation of Employees	Additionally, the EIB-CM website will be upgraded to include practical information on different aspects related to the new EIB-CM Policy, including on how to submit a complaint.
9.	There is currently also a telephone line available. Maintaining this option would be valuable, as it increases accessibility. In addition, it could be helpful to establish local contact points, for instance through EU delegations in countries where projects financed by the Bank are implemented.	International Organisation of Employees	The EIB-CM regularly follows up with an email or a call if some aspects of the complaint require clarification.
10.	The EIB-CM should be able to initiate complaints even where no formal complaint has been lodged.	Hamu Geredo, New Planet Alliance (section 6.1)	Paragraph 27 of the draft new EIB-CM Policy already provides for this option.

Ref	Summary of Contributions	Contributor	Response
11.	Admissibility criteria appear relatively broad. It might be worth refining them, particularly by further specifying the notion of “negative impact,” potentially with clearer thresholds or illustrative examples.	International Organisation of Employees	While its mandate has been sharpened, the broad admissibility of the EIB-CM is considered a key strength of the mechanism. The notion of negative impact is very much linked to the concrete project and individual or communities impacted. The assessment of the negative impacts is done by the EIB-CM as part of its complaints handling process and after a complaint is declared admissible. Further narrowing the admissibility criteria would not be in line with international best practices or the UN Guiding Principles on Business and Human Rights.
12.	A lack of clear timelines for admissibility determination was identified, which may affect timeliness and responsiveness; introducing defined timeframes, in line with other IAM practices, was suggested.	Laure-Anne Courdesse and Margaret Wachenfeld IAM professional Martin Packmann; Clara Ramos; Gastón Ain; María Camila Barriga; Sebastián González; Anja Brenes Joint CSO Comments (section III) Hamu Geredo, New Planet Alliance (section 7)	Considering these comments, timelines were added to the draft new EIB-CM Policy for acknowledgement of receipt (para 28), admissibility (para 41) and screening (para 43), for the sake of consistency and transparency.

Ref	Summary of Contributions	Contributor	Response
		Save the Children (3.1)	
13.	Concerns were raised that the complaint handling process—particularly the sequencing of screening, Initial Compliance Assessment, and Initial Dispute Resolution Assessment—is complex and time-consuming, potentially delaying engagement with the substance of complaints and the implementation of remedial actions. It was suggested to streamline the process by integrating preliminary feasibility checks (e.g. willingness of parties to engage in dispute resolution, or identification of systemic issues for compliance review) into the initial screening stage, with a view to simplifying or removing separate initial assessment phases.	IAM professional	One of the recommendations of the External Review was to rethink the current initial assessment step (as defined in the 2018 Policy and Procedures) and replace it by a short “traffic-light” step in which a decision is quickly taken as regards to the allocation of the complaint to either Early Resolution, Dispute Resolution or Compliance (this is called the “screening” phase in the draft new EIB-CM Policy). The assessment on whether the conditions are met to carry out a Dispute Resolution process or whether there are indications of negative impacts, project’s non-compliance and a plausible link between them, which would justify a Compliance review, is more time-consuming and involves the deployment of substantial resources. It was therefore decided to introduce an “initial assessment stage”, which is carried out separately either by the Dispute Resolution or the Compliance teams, immediately after the “screening” stage. This offers clarity early-on on the method followed to handle the complaint, as well as allows to use the EIB-CM resources more efficiently.
14.	It was suggested to reconsider the exclusion of complaints subject to ongoing judicial or arbitral proceedings, noting that such restrictions may limit the effectiveness of the mechanism. Experience from other IAMs indicates that allowing such cases, even where parallel processes exist, can contribute to addressing unresolved environmental and social issues and mitigate associated risks.	Martin Packmann ; Clara Ramos ; Gastón Ain ; María Camila Barriga ; Sebastián González ; Anja Brenes	The draft new EIB-CM Policy does not consider complaints to be inadmissible solely because the underlying allegations are subject to judicial or arbitral proceedings. As set out in paragraph 37 (e) of the draft new EIB-CM Policy, inadmissibility applies only where the complaint raises the same allegations and are part of proceedings filed against an EIB Group entity before EU administrative or judicial review mechanisms . This approach aims to avoid duplication of processes concerning the EIBG itself, while not excluding complaints related to project impacts that may be subject to other parallel proceedings.
15.	Complaints should remain admissible and be processed by the EIB-CM even when parallel legal or administrative proceedings are ongoing, as only the EIB-CM can assess	Joint CSO Comments (comment 8)	

Ref	Summary of Contributions	Contributor	Response
	compliance with EIB Group policies without interfering with external processes.		
16.	It was suggested to strengthen the treatment of complaints related to projects “considered for financing” and under appraisal by the EIB by introducing clearer requirements on the content, timing, and follow-up of Services’ assessments. This includes engagement with complainants, provision of a substantive response to the complainant prior to financing approval, transmission of complainants’ views to governing bodies, and integration of preventive and mitigation measures into project design.	Anonymous	Effectively addressing complaints related to projects under appraisal is key. As set out in the draft new EIB-CM Policy, where a complaint concerns a project “considered for financing”, the EIB-CM transfers the complaint to the relevant EIBG Services, who are responsible for assessing it, taking any appropriate actions, informing the governing bodies in the context of the financing decision, and responding to the complainant. At this stage, the role of the EIB-CM is distinct from that of the Services. In order to preserve its independence and avoid potential conflicts of interest at later stages, the EIB-CM does not intervene in the appraisal process or the decision to finance, as it may subsequently be required to review the same issues if a complaint is submitted after project approval. Within this framework, the draft new EIB-CM Policy already provides that complaints must be taken into account during appraisal and that a response must be provided to the complainant, while maintaining a clear separation between the appraisal function and the EIB-CM’s ex post review role. The EIB-CM will close the complaint only after the EIB Services have adequately responded to the complainant. Additionally, if the complainant is not satisfied with the EIB Services’ response, he/she can file a complaint with the EIB-CM once the project is approved and the EIB-CM retains the right to address the EIBG Governing Bodies during the handling of a complaint (paragraph 24). However, given the feedback received, the relevant paragraph was redrafted to offer more clarity on what is expected from the EIBG Services in these situations.
17.	The draft Policy constitutes a regression from the current CM Policy concerning pre-approval complaints by transferring them to EIBG Services without requiring follow-up or ensuring concerns are addressed. The EIB-CM Policy should be aligned with international good practice by setting time-bound responses from Services and allowing pre-approval complaints to proceed through regular complaint handling procedures if issues remain unresolved.	Joint CSO Comments (comment 7)	

Ref	Summary of Contributions	Contributor	Response
18.	Important to the timely delivery of remedy is flexible sequencing of DR and CR processes. Insofar as the screening process is intended to help the EIB-CM “ <i>determine the most appropriate way forward</i> ”, taking the Complainant’s preference into account, they should have the latitude to bifurcate issues to allow DR and CR to take place simultaneously in the service of efficiency and shortened process.	Joint CSO Comments (comment 6) Save the Children (2.6)	There is nothing preventing the EIB-CM to conduct separate processes for different allegations, as part of the same complaint. In these cases, the EIB-CM may consider conducting parallel Dispute Resolution and Compliance processes in relation to the same complaint and these would then be registered as separate cases. Therefore, additional clarifications concerning this point are not needed.
19.	It was suggested to clarify that admissibility should be based on the timing of the alleged harm rather than the project stage at the time of the complaint. Specifically, it was proposed to confirm that once a project enters appraisal, complainants may raise earlier harms linked to the project, to avoid excluding relevant impacts due to timing.	Anonymous	The draft new EIB-CM Policy does not deem inadmissible complaints concerning impacts that have already occurred at the time of submission, as reflected in the admissibility criterion which explicitly refers to impacts that may have arisen in the past or may occur in the future. At the same time, the draft new EIB-CM Policy establishes temporal boundaries for the submission of complaints in order to ensure the effectiveness of the mechanism. In particular, the scope of the EIB-CM is linked to projects that are under consideration for financing or within the period of the EIBG’s financial involvement, where the Bank has the ability to assess, influence, or remedy potential impacts. Complaints submitted outside these temporal parameters may limit the EIB-CM’s capacity to meaningfully engage or contribute to effective outcomes, as well as the capacity of the EIBG to exercise its leverage for promoters/clients to define and implement remedy measures.
20.	It was suggested to clarify the grounds for extending complaint processing timelines by specifying typical circumstances that may justify such extensions (e.g. case complexity, need for site visits or expertise, or access constraints), while maintaining a degree of flexibility.	Anonymous	The text was adapted to take the comments into account.

Ref	Summary of Contributions	Contributor	Response
21.	Reasonable grounds should not include protracted dispute within EIB Group as to the EIB-CM's findings or recommendations, which in any event would imply compromises to the EIB-CM's independence and effectiveness. Therefore, the following wording should be added: "outside of the control of the EIB-CM and/or EIB Group".	Joint CSO Comments (section III) Save the Children (3.1)	
22.	Concerns were raised that new admissibility exclusions (e.g. for policy or discretionary decisions) may restrict access to the mechanism and limit the ability to address systemic issues. It was suggested to broaden admissibility to include such matters, in line with established standards, to strengthen accountability.	Save the Children (2.3)	The exclusion of complaints related to policy, strategic, or discretionary decisions is consistent with the approach already established under the 2018 Policy. As reflected in these provisions, matters concerning the legality of EIB/EIF policies adopted by the EIBG Governing Bodies, as well as financing decisions, investment mandates, or other discretionary banking decisions, fall outside the scope of the EIB-CM and are addressed through other institutional channels. This reflects the role of an independent accountability mechanism, which is not to review strategic or policy decisions of the institution, but to assess whether its operations and projects are implemented in line with applicable environmental and social policies and standards, and to address related impacts and potential non-compliances. At the same time, the EIB-CM's Dispute Resolution, Compliance, and Advisory functions contribute to institutional learning. Subject to confidentiality constraints, the EIB-CM may share lessons learned with relevant the EIBG Governing Bodies and with the EIBG Services, and, where appropriate, recommend the development of a SRAP to identify measures aimed at preventing similar non-compliances in the future (in case of Compliance reviews that identify non-compliances).
23.	The EIB-CM should timely disclose its admissibility decision, including reasons for rejection.	Hamu Geredo, New Planet Alliance (section 2.2)	Paragraph 41 provides a requirement for the EIB-CM to inform the complainant of its admissibility determination.

Ref	Summary of Contributions	Contributor	Response
			Considering the comment, the text was adapted to indicate that the EIB-CM will publish the outcome of the admissibility determination on its website. Additionally, a deadline for admissibility determination was included. In practice, the reasons for rejection are always communicated to the complainants, depending on the specific case circumstances.
24.	In respect to paragraph 30, the time limits for submitting complaints should allow deadlines to start from when harm becomes reasonably known, acknowledging that environmental damage may emerge only after long delays. It also recommends adapting timelines in cases of cumulative impacts and allowing proceedings to be reopened when new evidence arises, regardless of financial closure. These changes are justified by concerns that existing deadlines restrict access to justice, disadvantage affected communities, and fail to reflect the latent and evolving nature of environmental harm, contrary to the principle <i>in dubio pro natura</i>.	Mupan - Women in Action in the Pantanal/Wetlands International Brazil (proposal 6)	The External Review pointed out to the need to change the general admissibility timeline, which was set as 1 year from the moment in which complainants became aware (or could have become aware) of the facts leading to the complaint. This criterion has revealed itself to be at times complicated and lead to unnecessary uncertainty for stakeholders. It was therefore decided to set a clear timeline that is fixed as 24 months after project completion for physical projects or 24 months after the end of the EIBG's financial relationship for other cases. The new timeline is aligned to the practice of peer IAMs and aligned to the UN Guiding Principles on Business and Human Rights. Setting this new timeline enables a good balance between the need to give time for complainants to submit their complaints (since, as indicated, negative impacts may emerge only after some time), while keeping the principle that, as in any legal system, there needs to be a point after which actions or omissions can no longer be contested. In case of new allegations arising, these can either be included under an existing case or give rise to new complaints.
25.	Rephrase 23 (c) to explain that non-authorized representation is also possible	Marjanne Servenant	Paragraph 26 (c) enables CSOs to submit complaints related to alleged negative social impacts of a project. It does not require a formal representation, but only an explanation on

Ref	Summary of Contributions	Contributor	Response
			why the relevant individuals or communities were not able to submit a complaint themselves.
26.	Provide more info to 26 (b) to explain what data should be provided	Marjanne Servenant	Information will be published on the EIB-CM website to help complainants better understand how the new EIB-CM Policy will be applied, and in particular, what is needed to file a complaint. This topic will be covered.
27.	Add a bullet to para 27 in relation to threats and reprisals (making reference to para 13 (g))	Marjanne Servenant	The text was revised to take this comment into account.
28.	Add a bullet to para 30 regarding primary suppliers	Marjanne Servenant	The applicability of the EIBG's ESSF to supply chains and the responsibilities of clients/promoters and of the EIBG entities to duly appraise and monitor risks in supply chains is regulated therein. The draft new EIB-CM Policy allows any complaints alleging negative effects resulting from non-compliances with, inter alia, the EIBG's ESSF. In case this is connected to primary suppliers, it will be analysed by the EIB-CM. It is considered that there is no need to specify this particular case, as the option has been to keep the references to the applicable environmental and social standards as general as possible to avoid unnecessarily narrowing the scope of the mechanism.
29.	The contributor welcomes guidance on treatment days but suggests adding timelines for SRAP submission to governance bodies and clarifying on what budget SRAP would be defined, implemented and monitored.	Agence Francaise de developpement (AFD)	Deadlines have now been included for SRAP submission (please see paragraphs 74-77). Budget for a SRAP, albeit very relevant, may not always be required. It could be that a project already has foreseen contingency budget for complaints. Given that the wording of the draft new EIB-CM Policy is meant to be applicable generally to all cases, this specific reference was not included.

Ref	Summary of Contributions	Contributor	Response
30.	Stakeholders asked whether a complaint about cultural heritage would be considered a social or environmental complaint for the purpose of paragraph 23b of the Policy.	Bankwatch during the call of 31 of March, Brussels meeting 28/04	Cultural heritage - being a public good - should be considered as an environmental impact for the purpose of paragraph 26b of the new EIB-CM Policy. A footnote was added to this paragraph clarifying that for the purpose of this provision, environmental impacts include impacts on cultural heritage.
31.	Stakeholders requested that EIB-CM's decisions at admissibility, screening and early resolution be transparent.	Accountability Counsel during workshop of 14/04, Public meeting in Brussels, 28/04	The importance of transparency is not questionable. Minor edits for clarification were brought to the paragraphs related to transparency of the admissibility, screening and early resolution processes. The outcome of the admissibility decision and of the screening decision will be published on the EIB-CM's website as per paragraphs 41 and 43 of the draft new EIB-CM Policy. In line with paragraph 45, in case of early resolution, the EIB-CM will publish the relevant information on its website, including, the timeline and issues expected to be addressed and, at the end, the outcome of the process, including whether there are outstanding issues to be addressed and potential next steps.

Question 5 – Early Resolution: Please provide your comments on the provisions related to early resolution of environmental and social complaints under the draft new EIB-CM Policy.

Ref	Summary of Contributions	Contributor	Response
1.	It was suggested to involve the Complainant more explicitly in the Early Resolution process, alongside EIBG Services and the Client/Promoter, to support effective resolution of the issues raised.	Laure-Anne Courdesse and Margaret Wachenfeld	Appropriate engagement with complainants is essential to an effective resolution of issues and to help ensure that complainants feel heard and respected.
2.	In respect to paragraph 42, the EIBG Services should also consult the Complainant when addressing the issues raised in the Complaint.	Joint CSO Comments (comment 5)	The Early Resolution phase is designed to enable a timely resolution of issues by the EIBG Services, while maintaining a clear distinction of roles and avoiding potential conflicts of interest with subsequent stages of the EIB-CM process. As the new EIB-CM Policy governs the activities of the mechanism, it does not seek to regulate the operational conduct of EIBG Services, which is instead guided by the EIBG's own policies and procedures. Within this framework, EIBG Services remain responsible for pursuing Early Resolution, including stakeholder engagement as appropriate. It is therefore for the EIBG Services to determine the nature and extent of engagement with the complainant, in line with applicable EIBG policies. In any case, some changes were introduced to paragraph 45. Overall, it is important to note that the complainants can, at any time, exit the Early Resolution process and that the case remains open with the EIB-CM and can be handled under the standard processes of the EIB-CM in case the issues are not effectively resolved during Early Resolution.
3.	In respect to paragraph 42, the EIB CM should seek the Complainant's agreement to proceed to an Initial Compliance Assessment or, not exceptionally, but as an alternative, proceed with Dispute Resolution.	Joint CSO Comments (comment 5)	The wording was adapted to take this comment into account.

Ref	Summary of Contributions	Contributor	Response
		Martin Packmann; Clara Ramos; Gastón Ain; María Camila Barriga; Sebastián González; Anja Brenes	
4.	In respect to paragraphs 42 and 43, the EIB-CM should publish all relevant information (including a summary of the process and outcomes).	Joint CSO Comments (comment 5)	New wording was included in paragraph 45 to take this comment into account.
5.	The EIB-CM should monitor the implementation of SRAPs developed through the Early Resolution process.	Joint CSO Comments (comment 5)	SRAPs are not envisaged as part of the Early Resolution process. The idea is that the issues are resolved as part of the Early Resolution process, but this does not lead to a SRAP (which results only after a Compliance review). The option is used when it proves to be more efficient to address issues. The development and implementation of a SRAP is a longer process that requires a longer period of time. The draft new EIB-CM Policy states that the EIB-CM will take over the case (under Dispute Resolution or Compliance) in case of outstanding issues at the end of the Early Resolution process.
6.	It was suggested to consider establishing a complementary management-led problem-solving mechanism to address project-level concerns more rapidly, while preserving the role of the EIB-CM as an independent mechanism of last resort. It was further noted that such a mechanism should not restrict access to the EIB-CM, allowing stakeholders to engage with both channels either concurrently or subsequently.	Anonymous	The development of the Early Resolution option in the new draft new EIB-CM Policy is intended precisely to provide an avenue for EIBG Services to address issues in a timely and pragmatic manner, in direct coordination with the client/promoter, where the concerns raised are limited in scope and suitable for such an approach. As reflected in the draft new EIB-CM Policy, Early Resolution may be pursued where the issues can be addressed efficiently, do not involve systemic concerns or serious risks, and where both the complainant and the EIBG Services agree to engage in this process.

Ref	Summary of Contributions	Contributor	Response
			Within this framework, responsibility for resolving the issues rests with the EIBG Services, and the effectiveness of Early Resolution will depend on the efforts of the EIBG Services and of the client/ promoter. The possibility of establishing a management-led grievance mechanism should be discussed in the framework of other policies of the EIBG, namely its ESSF. The ESSF already requires projects to have a project-level grievance mechanism, which ideally should be the first point of contact for complainants. This, however, is not a condition of access to the EIB-CM, which remains available even if complainants have not reached out to said project-level mechanism. The introduction of management-level mechanism is a decision that requires further discussion at the EIBG-level and involves considerations that go beyond the scope of the EIB-CM mandate.
7.	The EIB-CM should introduce safeguards to ensure that communities give informed consent before engaging in Early Resolution (and other EIB-CM processes), including full disclosure of implications, independent technical and legal support, and protection against confidentiality clauses that conflict with human rights and transparency. It also stresses that participation in Early Resolution should not affect admissibility timelines and that resulting agreements should be independently validated for compliance with safeguards. These measures are justified by concerns that the process may otherwise lead vulnerable communities to accept inadequate outcomes, highlighting the need for stronger procedural protections and support.	Mupan - Women in Action in the Pantanal/Wetlands International Brazil (proposals 4 and 10)	Paragraph 44 requires the EIB-CM to explain the process to the complainant and obtain their agreement before deciding to transfer the case for Early Resolution. The participation in Early Resolution does not impact admissibility timelines as admissibility is determined before the Early Resolution process starts. As per paragraph 45, the EIB-CM is required to consult the complainant at the end of the Early Resolution Process. Paragraph 46 allows the complainant to leave the Early Resolution process at any time. Finally, both the EIB-CM and the EIBG have protocols in place to address the risk of reprisals given the zero tolerance towards reprisals.

Ref	Summary of Contributions	Contributor	Response
8.	The comment notes that while early resolution can improve efficiency, it may risk prematurely closing serious complaints. It calls for safeguards to ensure voluntary participation of complainants and to exclude high-risk cases—including those involving human rights violations or systemic issues—in line with the draft policy's conditions.	Eng. Abdiaziz Ibrahim Sheikh	This point is reflected in the safeguards set out in the draft new EIB-CM Policy. Any transfer to Early Resolution is conditional upon the agreement of both the Complainant and the EIBG Services. In addition, the EIB-CM proceeds with such transfer only where, on the basis of available evidence, it considers that the alleged impacts are clearly identified and can be addressed efficiently and effectively within a defined timeframe, that there is no apparent risk of retaliation, and that the issues raised are not systemic, do not involve serious human rights violations, and do not extend beyond the concerned group of complainants. Furthermore, the case remains open with the EIB-CM throughout the Early Resolution process, while complainants retain the possibility to disengage from the process, thereby safeguarding against premature closure of more complex or sensitive cases. Finally, the case can return to the EIB-CM for processing under its standard processes in case of outstanding issues at the end of the Early Resolution process.
9.	The decision to go to Early Resolution should also take the client's views into consideration	Marjanne Servenant	In line with the draft new EIB-CM Policy, any decision to transfer a case to Early Resolution is subject to the agreement of both the complainant and the EIBG Services. In this context, the EIBG Services will liaise with the client/promoter to confirm, on the basis of available evidence, that the issues raised can be addressed efficiently and effectively within the envisaged timeframe and in accordance with the criteria set out in the draft new EIB-CM Policy.

Question 6 – Dispute Resolution: Please provide your comments on the provisions related to dispute resolution for environmental and social complaints under the draft new EIB-CM Policy.

Ref	Summary of Contributions	Contributor	Response
1.	It was suggested to strengthen provisions on the role of EIBG Services in the Dispute Resolution process in para. 60, including clearer expectations for cooperation, consultation with the DR function, and support to ensure promoter engagement and follow-up on issues related to E&S performance.	Laure-Anne Courdesse and Margaret Wachenfeld	Wording was amended in relation to the role of EIBG Services in the Dispute Resolution process. The obligation of the EIBG Services to ensure that the client/promoter implements the environmental and social requirements already results from the EIBG ESSF.
2.	It was suggested to strengthen the role of EIBG Services in Dispute Resolution by recognising them as a full party to the process, rather than as participants or observers, in order to enhance engagement, expand solution options, and support institutional learning.	Martin Packmann; Clara Ramos; Gastón Ain; María Camila Barriga; Sebastián González; Anja Brenes	Wording was added to address the involvement of the EIBG Services in the Dispute Resolution process.
3.	There should not be a maximum time limit on the Dispute Resolution process.	Joint CSO Comments (comment 6)	The concern regarding the introduction of a time limit for the Dispute Resolution process is acknowledged. While setting a timeframe can present challenges, the inclusion of a flexible (“soft”) time limit, in line with the external review’s recommendation, aims to help maintain momentum and sustain the engagement of all parties in working towards a solution. The text was revised to explicitly recognise that more complex cases may require additional time. Corresponding wording has been introduced to that effect. The intention is therefore not to constrain the process, but to provide a framework that supports both effectiveness and

Ref	Summary of Contributions	Contributor	Response
			flexibility, depending on the needs and complexity of each case.
4.	The EIB-CM Policy should establish a presumption of public disclosure of the Dispute Resolution agreements by default, subject to redactions or withholding from disclosure on the basis of any confidentiality arrangements agreed between the parties.	Joint CSO Comments (comment 6)	This has indeed been the practice of the EIB-CM. The text was modified to address this comment.
5.	The EIB-CM Policy should contain provisions on regular six-monthly monitoring of Dispute Resolution agreements and, if agreed remedial actions are not implemented, the EIB-CM should be able, subject to complainants' consent, to close the DR process (fully or partially) and refer unresolved issues for an Initial Compliance Assessment.	Joint CSO Comments (comment 6)	The monitoring carried out by the EIB-CM of Dispute Resolution agreements, including the frequency of verification of their implementation, will depend on the circumstances of each case. In certain cases, a very regular contact with the parties will indeed be required, but not in all cases. Introducing a mandatory blanket six-month monitoring check-in would not give the EIB-CM the flexibility to adapt the monitoring to the needs of each case. The text was revised to clarify the balance between case-adapted monitoring and ensuring regular follow-up with the parties. The function of the Dispute Resolution monitoring is to ensure that agreements are implemented as agreed by the parties. In cases in which this does not occur, the first measure is to reconvene the parties and agree solutions to implementation challenges. If outstanding issues persist and cannot be addressed collaboratively as part of the dispute resolution monitoring, the complainants may submit a new complaint. The lack of implementation of the agreed action will constitute "new evidence or circumstances not known at the time of the previous Complaint" as provided for in paragraph 37 (d) of the new EIB-CM Policy.
6.	In paragraph 56, the CM should indicate that the Dispute Resolution Closure Report will be published on the EIB-CM's website " <i>within five business days</i> ".	Joint CSO Comments (section III)	The draft new EIB-CM Policy was changed to include a timeline for finalization of the Dispute Resolution Closure Report after receiving comments.

Ref	Summary of Contributions	Contributor	Response
7.	Concerns were raised that increased reliance on dispute resolution may reduce focus on accountability, particularly given potential power imbalances and risks of avoiding formal review. It was suggested to ensure complainant choice, allow flexibility between processes, introduce safeguards, and maintain a strong compliance review function.	Save the Children (2.6)	Under the current 2018 Policy, the EIB-CM is predominantly a compliance review mechanism. The Dispute Resolution function was not clearly explained nor clearly structured in that Policy. One of the recommendations of the External Review was to enhance and better structure the policy provisions regarding Dispute Resolution. This is also very much aligned with the new EIB-CM mandate (to resolve complaints and facilitate access to remedy). Dispute Resolution is a powerful and effective tool to bring resolution to issues on the ground and to enhance access to remedy. At the same time, the Compliance review function was not diminished. Both options are now equally available for complainants. The complainants' choice is paramount here: since Dispute Resolution is a voluntary process, it cannot move forward if the complainants are not interested. Additionally, there are tools in Dispute Resolution processes to address power imbalances. Dispute Resolution is an integral part of accountability given its focus on facilitating access to remedy for the complainants. The draft new EIB-CM Policy is aligned to the policies of other IAMS and best practices in this regard. The draft new EIB-CM Policy also includes the important advisory function of the EIB-CM, which is used precisely to incentivise institutional learning.
8.	Recommends that the policy: specifies clear criteria for when cases should be referred to compliance review, rather than or in addition to dispute resolution; allows complainants to request a shift from dispute resolution to compliance review if mediation fails or is deemed inappropriate; ensures DR processes do not require complainants to waive rights to further recourse.	Hamu Geredo, New Planet Alliance (section 5.1) Joint CSO Comments (Section 6)	According to the draft new EIB-CM Policy, the criteria to refer cases to Compliance assessment are simple: should parties not be interested in Dispute Resolution, or should the EIB-CM consider, after careful consideration and analysis, that a Dispute Resolution process is not feasible or suitable, the case is assigned to Compliance. The draft new EIB-CM Policy does not foresee the possibility to conduct a Dispute Resolution and a Compliance process simultaneously in relation to the same allegations, but does not prohibit two parallel processes on separate allegations raised within the same case or complaint.

Ref	Summary of Contributions	Contributor	Response
			Additionally, according to paragraph 58 of the draft new EIB-CM Policy, complainants can request the transfer of the case to Compliance assessment if the Dispute Resolution was not successful. The draft new EIB-CM Policy does not mention that Dispute Resolution processes require complainants to waive any of their rights to pursue other avenues. It will be up to the Parties to jointly decide if they wish to pursue other avenues in parallel to a Dispute Resolution process.
9.	The draft EIB-CM Policy should establish a structured monitoring framework for dispute resolution outcomes, with clear milestones and assigned responsibilities. It should also provide for EIB-CM oversight in verifying implementation of agreed remedies and ensure appropriate public disclosure of agreements and their status, while respecting legitimate confidentiality constraints.	Hamu Geredo, New Planet Alliance (section 5.2)	The purpose of the EIB-CM monitoring role is to oversee the implementation of the agreed actions in a Dispute Resolution process. The Dispute Resolution monitoring framework, its milestones and responsibilities, will entirely depend on the content of the agreement between the parties, and will therefore be different in each case. Similarly, the role of the EIB-CM in monitoring will depend on what the parties decide and need. Hence, it would be challenging to have a template monitoring framework with milestones and responsibilities for all cases, since it would reduce flexibility. The EIB-CM will publish Dispute Resolution agreements subject to the Parties' consent.
10.	The comment notes that, although dispute resolution is recognized, it remains underutilized. It calls for strengthening this function through increased resources and mediation capacity, greater use of early mediation, and ensuring neutral facilitation to build trust among parties.	Eng. Abdiaziz Ibrahim Sheikh	The observation is line with the recommendations of the External Review. The draft new EIB-CM Policy strengthens Dispute Resolution by presenting it at par with Compliance and providing a clearer description of its role and process. This is expected to contribute to an increase in the use of Dispute Resolution, while the EIB-CM will continue to take into account the specificities of each complaint and the available resources.

Ref	Summary of Contributions	Contributor	Response
11.	In para 48, add details about the review process of the draft DR Assessment report (same as it is done for the DR closure report)	Marjanne Servenant	The paragraph already includes a description of the review process of Initial Dispute Resolution Assessment reports. Given the fact that this report is the result of an initial assessment, its review will be simpler and more streamlined than the review of the final Dispute Resolution Closure Report.
12.	In para 54, does this also apply for cases where no agreement has been implemented (not only “reached”)?	Marjanne Servenant	Paragraph 57 of the draft new EIB-CM Policy only relates to parties reaching an agreement as a result of a Dispute Resolution process. The EIB-CM monitoring mandate, which verifies the implementation of the terms of such agreement, is provided for in paragraphs 61 and 62.
13.	In para 55, explain “exceptional cases”; in para 58, explain “justified cases”; in para 60, explain “where appropriate”	Marjanne Servenant	While the need for predictability is understood and addressed throughout the draft new EIB-CM Policy, it is also important for the EIB-CM to remain flexible in its approach. The introduction of these expressions aims at allowing for such flexibility.
14.	In para 59, indicate the frequency of the monitoring reports	Marjanne Servenant	The frequency of monitoring reports will depend on the content of the Dispute Resolution agreement reached between the parties. It would be difficult to standardise this, as flexibility is an inherent strength of the Dispute Resolution process.

Question 7– Compliance: Please provide your comments on the provisions related to compliance reviews of environmental and social complaints under the draft new EIB-CM Policy.

Ref	Summary of Contributions	Contributor	Response
1.	The draft EIB-CM Policy should clearly establish that the EIB-CM's compliance mandate covers the full range of EIB environmental and social standards, including relevant external benchmarks such as IFC Performance Standards. It should explicitly recognise climate-related harm and human rights impacts as valid grounds for complaints. The draft EIB-CM Policy should also address how transboundary environmental impacts are handled, particularly for projects spanning multiple jurisdictions.	Hamu Geredo, New Planet Alliance (section 4)	The EIB-CM has a mandate to assess compliance of a given project with project's related policies and procedures, including the EIBG's ESSF. While IFC Performance Standards are similar to the EIBG's ESSF, EIBG financed projects are required to comply with the EIBG's ESSF. Aspects such as climate and transboundary effects are covered by the EIBG's ESSF.
2.	The draft EIB-CM Policy should establish evidence-based methodologies for compliance assessments and the EIB-CM should be able to access all relevant project related documents.	Hamu Geredo, New Planet Alliance (section 4)	The draft new EIB-CM Policy already provides this in paragraphs 23, 68 and 71.
3.	It was noted that the term "SRAP" may lack clarity and is not widely used; replacing it with a more commonly recognised term such as "Management Action Plan" was suggested.	Laure-Anne Courdesse and Margaret Wachenfeld	The terminology was revised from "Management Response Action Plan" to "Services Response Action Plan" to avoid ambiguity between the roles of EIBG Services and the EIB Management Committee (which is one of the EIBG Governing Bodies. An explanation of their role was added to the text). As the action plan is developed by the EIBG Services, in coordination with the client/promoter, and submitted for consideration by the EIB Management Committee in cases of escalation, the term "SRAP" was considered more accurate and reflective of respective responsibilities.
4.	At Initial Compliance Assessment, it was suggested to remove the criterion related to assessing if there are preliminary indications of the Complainant being affected, as this is addressed at the admissibility stage and may unnecessarily	Laure-Anne Courdesse and Margaret Wachenfeld	This criterion does not duplicate the admissibility stage, where the complainant is only required to allege that they are affected. To streamline the process and avoid extensive analysis at admissibility, the verification of whether there are

Ref	Summary of Contributions	Contributor	Response
	duplicate requirements and add complexity, while not aligning with standard IAM practices.		preliminary indications substantiating these allegations is undertaken during the Initial Compliance Assessment phase.
5.	It was suggested that the necessity of the separate Initial Compliance Assessment phase be reconsidered, as it may not lead to a distinct procedural outcome and could introduce delays and duplication. As an alternative, introducing a simplified approach allowing early termination of compliance review where no prima facie evidence is found, without requiring a standalone assessment phase, was proposed.	IAM professional	The draft new EIB-CM Policy follows established practices among other IAMs, whereby the responsibility to identify preliminary indications justifying a Compliance review rests with the mechanism, rather than allowing for early closure in the absence of such indications. This approach supports a more consistent and structured assessment within defined timelines. It also reflects the findings of the External Review, which highlighted that the initial assessment phase under the existing EIB-CM 2018 Policy was not sufficiently used to assess the merits of proceeding to a full Compliance review. In case there is no prima facie evidence, the case is closed at the initial compliance assessment stage.
6.	It was suggested to align the wording on recommendations for a SRAP of paragraphs 67 and 69c with earlier provisions in paragraph 6 by explicitly referring to addressing both non-compliance and actual or potential environmental and/or social impacts through the SRAP.	Laure-Anne Courdesse and Margaret Wachenfeld	Paragraphs 70 and 74 were adapted to make the distinction between addressing the non-compliance and remedying the impacts clearer.
7.	The provision in paragraph 70 was generally welcomed as good practice for ensuring simultaneous consultation, but it was suggested to allow flexibility in timelines to accommodate potential translation needs of complainants.	Laure-Anne Courdesse and Margaret Wachenfeld	In line with paragraph 28, the EIB-CM endeavours, where possible, to handle complaints submitted in non-EU languages in the language of the complaint. In addition, paragraph 31 provides flexibility to extend applicable timelines where necessary, including in cases requiring more complex or time-consuming translation.
8.	It was suggested to ensure timely publication of the final Compliance Conclusions Report once factual comments are addressed, without delaying disclosure due to SRAP	IAM professional	Under the Outcome section, the draft new EIB-CM Policy already provides that the Compliance Conclusions Report is

Ref	Summary of Contributions	Contributor	Response
	development. It was also proposed to clarify that the consultation and review phase is limited to factual comments and corrections—such as inaccuracies, omissions, or clarifications of information—and should not be used to negotiate substantive findings or recommendations.		shared for “factual review and comments” only prior to its finalisation. The draft new EIB-CM Policy now indicates that the final report will be shared with the complainants prior to the development of the SRAP. It will be later published along with the SRAP, once finalized. The draft new EIB-CM Policy provides that the EIB-CM will publish the compliance conclusions reports and SRAPs, as well as the EIB-CM’s views on the SRAPs where relevant.
9.	Concern was raised that the Policy should also require the publication on the EIB-CM website of cases referred to the Management Committee, of the decisions taken, and, where applicable, of cases referred onward to the Board.	Urgewald	
10.	It was also suggested to strengthen complainant involvement earlier in the SRAP preparation process to ensure consultation before client agreement.	Laure-Anne Courdesse and Margaret Wachenfeld IAM professional Joint CSO Comments (comment 2)	Complainants should indeed be involved at an early stage of development of the SRAP, in order to ensure that such plan addresses the concrete grievances of complainants. The text was adjusted to foresee that the draft SRAP shall “ <i>take into account the Complainant’s views gathered through direct or indirect engagement</i> ” (paragraph 74) and that the Complainants are again consulted on the SRAP at the end (paragraph 75).
11.	For paragraph 71 and 72, concerns were raised regarding the clarity of wording distinguishing between addressing non-compliance and remedying impacts, and the absence of a strict requirement for EIBG Services to provide reasoned explanations when not following EIB-CM recommendations. It was also suggested in case of escalation of the SRAP, to share complainant inputs with decision-making bodies.	Laure-Anne Courdesse and Margaret Wachenfeld	The text was adapted to use adequately the words “correct non-compliance” and “remedy impacts” and to clarify that the EIBG Services will include an explanation of reasons regarding the EIB-CM’s conclusions and/or recommendations that the EIBG Services are unable to address. Paragraph 76 includes the possibility to share complainants’ views on the SRAP with the relevant EIBG Governing Bodies.
12.	It was suggested to strengthen the Policy’s approach to remedy by reflecting a broader range of measures proportionate to the harms identified, including interim relief and concrete, time-bound actions (e.g. compensation, livelihood restoration, environmental remediation, and health	Anonymous Save the Children (2.5)	The draft new EIB-CM Policy states that the purpose of the SRAP is to address identified non-compliances and remedy related environmental and social impacts. The development of the SRAP falls under the responsibility of the EIBG Services

Ref	Summary of Contributions	Contributor	Response
	and safety measures), and to clarify minimum SRAP content accordingly.		and is carried out in agreement with the client/promoter and consultation with the complainants. In doing so, EIBG Services are guided by the applicable project-related policies and procedures, including the EIBG ESSF and the mitigation hierarchy therein established (which foresees appropriate measures, including offsetting where necessary). Given the wide range of possible corrective and remedial actions, and their case-specific nature, it was considered as more appropriate to rely on the existing framework and good practice rather than specifying predefined categories of measures. Nevertheless, paragraph 74 does include the minimum content of a SRAP.
13.	The complainants must have access to the final Compliance Conclusions Report before the SRAP has been prepared in order to meaningfully engage in the SRAP consultation process.	Joint CSO Comments (comment 2) IAM professional	The text was adapted to take this comment into account. Paragraph 73 states that final Compliance Conclusions Report will be shared with the complainants.
14.	It was suggested to clarify in paragraphs 73 and 74 that the Management Committee or EIF CE/DCE can require EIBG Services to revise or prepare a SRAP, and to ensure consideration of the views of all parties, including complainants.	Laure-Anne Courdesse and Margaret Wachenfeld Urgewald	Paragraphs 76 and 77 already provide that, where a SRAP is considered insufficient or where no SRAP is proposed, the matter- together with the respective views of the EIB-CM, the EIBG Services and, where relevant, those of the complainants - is submitted to the Management Committee or EIF CE/DCE for a response. It was clarified that where required, the Management Committee or the EIF CE/CDE may request the EIBG Services to revise or prepare a SRAP as appropriate.
15.	The EIB-CM should publish management responses to EIB-CM recommendations and monitoring reports.	Hamu Geredo, New Planet Alliance (section 2.2)	Paragraph 78 foresees publication of the management responses on the EIB-CM's website. Considering the received comment, paragraph 82 was adjusted to foresee publication on the EIB-CM's website of case-specific monitoring reports.

Ref	Summary of Contributions	Contributor	Response
16.	The EIB-CM should send to the Boards all Compliance Conclusions Report and SRAPs and the Boards should receive substantive information on all cases involving disagreement regarding SRAP.	Joint CSO Comments (comment 3)	The submission of all Compliance Conclusions Reports to the Boards was already foreseen in the draft EIB-CM Policy. Paragraph 79 was modified to clarify this point. Additionally, paragraph 115 establishes the regular reporting to the Boards.
17.	The EIB-CM should be able to escalate their objections of the Management Committee decision to the Boards as the ultimate decision-making body on the SRAP.	Joint CSO Comments (comment 3) Laure-Anne Courdesse and Margaret Wachenfeld Save the Children 2.5	Considering the received comments, paragraphs 76 to 77 were adjusted to provide wording that foresees the Boards are informed, but that also complies with the specific governance rules of the EIBG.
18.	Concerns were raised regarding the reliance on the Management Committee to resolve disagreements on SRAPs, noting past practice where such escalation has been limited, lengthy, and often did not result in independent outcomes. It was suggested to strengthen this mechanism by introducing clearer timelines, enhancing transparency, and providing for escalation to the Board of Directors where disagreements persist or decisions are not taken.	Urgewald Save the Children (3.3)	
19.	Concerns were raised that, in cases of disagreement on SRAP adequacy or on the need for a SRAP, decision-making is limited to the Management Committee while the Boards are only informed ex post. It was suggested to strengthen the role of the Boards of Directors by involving them directly in resolving such disputes.	Anonymous	
20.	It was noted that a CSO reports that the rate of findings of full compliance appears relatively high compared to some peer mechanisms, and it was suggested that this could merit further	Anonymous	These observations warrant a nuanced interpretation. The accessibility of the EIB-CM and its current mandate is broader than those of peer IAMs. Contrarily to other IAMs,

Ref	Summary of Contributions	Contributor	Response
	reflection to better understand potential differences in approach.		there is no prior good faith efforts to access the EIB-CM, the EIBG does not have a management-level grievance mechanism, there is no need for a Board authorisation to review compliance. Furthermore, under the current 2018 Policy, there is no structurally separated initial assessment stage that may allow the EIB-CM to close cases where there is no prima facie evidence of non-compliance. For these reasons, any comparison of numbers between the EIB-CM and peer IAMS needs to take the above into account. It should also be mentioned that, under the existing 2018 Policy, Compliance Conclusions Reports primarily assess maladministration by the EIBG. In cases where no maladministration (i.e. non-compliance) is identified, but there is room for improving certain processes in project appraisal or monitoring, the EIB-CM may issue suggestions for improvement (including where projects may not fully comply with the EIBG's ESSF but there is no maladministration).
21.	Project promoters and borrowers should be contractually obliged to respect the findings and recommendations of the EIB-CM and implement corrective actions to ensure project compliance with environmental and social standards.	Anonymous Save the Children (2.5)	Under the terms of EIBG financing agreements, clients/promoters are required to comply with the applicable EU regulatory framework and/or the EIBG ESSF. This is understood to provide sufficient contractual leverage to require corrective actions in cases of non-compliance. The EIB-CM also has an Advisory function - which serves to highlight systemic issues identified by the EIB-CM - which will be enhanced under the new EIB-CM Policy.
22.	It was suggested to strengthen in paragraph 77 the monitoring role of the EIB-CM by including more active oversight measures (e.g. consultations, site visits, and expert input), and to provide for complainants' participation in the monitoring process, including the opportunity to review and comment on implementation progress.	Laure-Anne Courdesse and Margaret Wachenfeld Joint CSO Comments (comment 4)	The relevant provisions were adapted foreseeing that the EIB-CM will review the relevant information and gather the complainants' views as part of its monitoring. Reference to site visits, meeting with stakeholders, and hiring independent experts, and publishing of reports were also added.

Ref	Summary of Contributions	Contributor	Response
		Urgewald Anonymous Save the Children 2.5	
23.	The comment welcomes the introduction of Services Response and Action Plans (SRAPs) but calls for stronger monitoring and enforcement measures, including independent verification, clear timelines for corrective actions, and public reporting on implementation progress.	Eng. Abdiaziz Ibrahim Sheikh	
24.	It was suggested to clarify in paragraph 78 the treatment of cases where SRAP actions are not fully implemented, including reflecting partial or unsatisfactory outcomes in monitoring reports and considering such outcomes in future engagements with the client.	Laure-Anne Courdesse and Margaret Wachenfeld	Paragraph 81 was adapted to avoid confusion. SRAPs which have not been effectively carried out within the implementation timetables established in the SRAP will be closed as “not implemented or partially implemented” if there is no reasonable expectation of further progress beyond those timelines. The new EIB-CM Policy cannot govern future financing decisions of the EIBG.

Ref	Summary of Contributions	Contributor	Response
25.	The draft EIB-CM Policy should strengthen the SRAP by introducing independent technical audits, involving affected communities in validating targets and timelines, and ensuring public disclosure with the possibility to challenge non-compliance. It also proposes that repeated failures should trigger corrective measures or reopening of proceedings, and that high-risk cases (e.g. protected areas or irreversible impacts) should allow for precautionary suspension of projects. These measures are justified by concerns that internally drafted SRAPs may lead to insufficient remediation and that ongoing project activities risk causing irreversible harm during implementation.	Mupan - Women in Action in the Pantanal/Wetlands International Brazil (proposal 5)	The relevant provisions were adjusted to establish that the monitoring by the EIB-CM will review the relevant information and consult with complainants within the framework of its monitoring and also includes references to the possibility of conducting site visits and hiring experts (where required). It was further clarified that monitoring will cover the period set forth in the SRAP for implementation of the relevant actions and can be extended beyond those deadlines if justified. Monitoring will also be more transparent, to enhance accountability. According to the draft new EIB-CM Policy, SRAPs will need to be drafted in agreement with the client/promoter and taking into account the views of the complainants. They will also be reviewed by the EIB-CM and escalation to the EIBG Governing Bodies is foreseen in case of different views. The track-record of clients/promoters in implementing SRAPs is information that the EIBG Services may take into account as part of their assessment of the relevant client/promoter's capacity to comply with the EIBG's ESSF (either under existing projects or future projects). Insufficient implementation can also trigger the submission of new complaints to the EIB-CM.
26.	It was suggested to strengthen in paragraph 79 reporting by ensuring that governing bodies are specifically informed of any disagreements regarding the need for or content of SRAP responses to EIB-CM recommendations.	Laure-Anne Courdesse and Margaret Wachenfeld	See response to comments above. The wording of paragraph 79 was adjusted.

Ref	Summary of Contributions	Contributor	Response
27.	It was noted that, despite improvements introduced with the SRAP and related disclosure provisions, there remains limited transparency on the evolution of commitments during the SRAP implementation phase and across cases. Strengthening visibility through more structured and accessible disclosure of case-level information, including status and implementation progress, and a case register was suggested.	Anonymous Save the Children (2.9, 3.4, 3.5) Eng. Abdiaziz Ibrahim Sheikh	The monitoring and reporting provisions of the draft new EIB-CM Policy were adapted to foresee that information on cases' compliance monitoring and SRAP implementation updates are made regularly on the EIB-CM website (register of cases) and annually in a report as well as through case specific monitoring reports where relevant.
28.	The draft EIB-CM Policy should require EIB management to formally respond to all EIB-CM recommendations within a defined timeframe. It should empower the EIB-CM to conduct follow-up checks and publicly report on implementation progress. Where recommendations are not fully adopted, management should provide a written and publicly available justification.	Hamu Geredo, New Planet Alliance (section 6.2)	These points are already addressed in paragraphs 74, 78, and 80-82 and clarifications were made to these paragraphs where necessary.
29.	In para 61, explain "where appropriate"	Marjanne Servenant	In this context (paragraph 64), "where appropriate" means that the EIB-CM will <i>"make recommendations to the EIBG to address non-compliance and facilitate remedy of actual or potential (and direct or indirect) negative environmental and/or social impacts through a SRAP"</i> in those cases where the EIB-CM has concluded that there are non-compliances and related negative impacts.
30.	In para 66, explain details of the review process of the report	Marjanne Servenant	The paragraph already includes a description of the review process of Initial Compliance Assessment reports. Given that this report is the result of an initial assessment, its review will be simpler and more streamlined than the review of the final Compliance Conclusions Report.
31.	Para 70: does this mean that in case of a SRAP, the Conclusions report will be published later?	Marjanne Servenant	The report will be finalized and shared with the parties before a SRAP is developed, however, it will be published later, along with the SRAP. The content of the report will not change between its finalization and its publication (please see paragraph 73).

Ref	Summary of Contributions	Contributor	Response
32.	Para 72: what is the purpose of sharing the SRAP with the complainants? Are the complainants consulted on the draft SRAP? It is unclear at what point the views of the complainants will be integrated in the SRAP	Marjanne Servenant	The draft SRAP, prepared by the EIBG Services, needs to be shared with the complainants, given that it is meant to offer measures and actions to address the grievances expressed by them. The principle is that complainants can review and express their views on the adequacy of the SRAP to the EIB-CM, who will then take those into consideration in its own review of the SRAP. Furthermore, paragraph 74 was adjusted to foresee that the views of the complainants, gathered through direct or indirect engagement, should be taken into account while the SRAP is being drafted.
33.	The contributor supports the greater prominence of dispute resolution and the integration of monitoring into dispute resolution and compliance functions. He also suggests clarifying criteria for transfer to early resolution and clarifying budget arrangements for SRAP.	Agence Francaise de developpement (AFD)	The criteria for a possible transfer of a case to Early Resolution is included in paragraph 44 of the new EIB-CM Policy. Budget for a SRAP, albeit very relevant, may not always be required. It could be that a project already has foreseen contingency budget for complaints. Given that the wording of the EIB-CM Policy is meant to be applicable generally to all cases, it was decided not to include this specific reference.
34.	The stakeholder shared that there was an inconsistency between para 77 and 79 in relation to the reporting on the EIB-CM website and through monitoring reports.	Bankwatch during a consultation meeting	Paragraphs 80 and 82 of the new EIB-CM Policy were adapted and indicate that compliance monitoring and SRAP implementation updates will be made regularly on the EIB-CM website and annually as part of its activity reporting. Changes are replicated in paragraph 104 for the Access to Information Complaints

Section III – Access to Information Complaints

Question 8– Submission and admissibility: Please provide your comments on the provisions related to the submission and admissibility of access to information complaints under the draft new EIB-CM Policy.

Ref	Summary of Contributions	Contributor	Response
1.	It was noted that the current structure of paragraph 80 is unclear due to cross-referencing and negative phrasing, and that a self-contained section on Access to Information complaints would improve clarity; alignment with broader comments on compliance review was also suggested.	Laure-Anne Courdesse and Margaret Wachenfeld	Various structural options for covering both Environmental and Social complaints and Access to Information complaints were carefully considered. The option ultimately chosen was to consider a structure that distinguishes between the two types of complaints while cross-referencing provisions that apply to both. This approach aims to ensure coherence and avoid unnecessary duplication, while maintaining a balance between clarity and conciseness in the draft new EIB-CM Policy.
2.	Para 80: suggests repeating the referenced paragraphs in the relevant paragraphs below	Marjanne Servenant	Various options were considered with regarding to cross-referencing. The approach chosen aims to ensure coherence and avoid unnecessary duplication, while maintaining a balance between clarity and conciseness.
3.	Can an Access to information complaint be submitted with an E&S complaint?	Marjanne Servenant	Indeed, complainants can send a complaint that relates both to E&S and access to information aspects. The allegations will be then separated and follow the different processes set forth in the draft new EIB-CM Policy.
4.	Para 83: maybe add a bullet point on Reprisals	Marjanne Servenant	The text was adapted to include this.
5.	The contributor argues that stakeholders should be able to challenge the internal EIB access to information rules and procedures themselves, not only individual decisions on specific requests related to projects or advisory work.	Dr Lucien Peters	Access-to-information Complaints are those that concern access to information held and/or published by the EIBG entities in accordance with the related policies and procedures (namely the EIBG Transparency Policy and the EIF Transparency Policy). These complaints can continue to be submitted to the EIB-CM under the new EIB-CM Policy.

Ref	Summary of Contributions	Contributor	Response
			Complaints challenging the legality of EIBG Policies are addressed by the EIBG Secretary General or the EIF Chief Executive. According to paragraph 38, these complaints will not be handled by the EIB-CM, but the EIB-CM transfers them to the relevant service of the EIBG.

DRAFT

Question 9 – Screening : Please provide your comments on the provisions related to the screening of access to information complaints under the draft new EIB-CM Policy?

Ref	Summary of Contributions	Contributor	Response
1.	In respect to paragraph 85, the EIB-CM should publish the Screening decision on its website within 15 business days.	Joint CSO Comments (section III)	Paragraph 89 was adapted to indicate that the screening process will be conducted within 20 business days and its outcome will be published on the website.

DRAFT

Question 10 – Early Resolution: Please provide your comments on the provisions related to early resolution of access to information complaints under the draft new EIB-CM Policy.

Ref	Summary of Contributions	Contributor	Response
1.	In respect to paragraph 87, the EIB CM should seek the Complainant's agreement to proceed to an Initial Compliance Assessment.	Joint CSO Comments (comment 5)	The Complainants that do not agree with the case advancing further may always terminate the case.
2.	In respect to paragraph 87, the EIB-CM should publish all relevant information (including a summary of the process and outcomes).	Joint CSO Comments (comment 5)	New wording was included in paragraph 91.
3.	The EIB-CM should monitor the implementation of SRAPs developed through the Early Resolution process.	Joint CSO Comments (comment 5)	SRAPs are not envisaged as part of the Early Resolution process. The idea is that the issues are resolved directly by the Services, in collaboration with the client, within a maximum of 6 months, and without the need for a SRAP. The development of a SRAP is a longer process that only results from a Compliance review that does not take place in Early Resolution. The draft new EIB-CM Policy states that the EIB-CM will take over the case (under Compliance or DR) in case of outstanding issues at the end of the Early Resolution process.

Question 11– Compliance: Please provide your comments on the provisions related to compliance reviews of access to information complaints under the draft new EIB-CM Policy.

Ref	Summary of Contributions	Contributor	Response
1.			
2.			

DRAFT

Section IV – Other roles and activities

Question 12– Advisory: Please provide your comments on the provisions related to the advisory role of the EIB Group Complaints Mechanism under the draft new EIB-CM Policy.

Ref	Summary of Contributions	Contributor	Response
1.	It was suggested to strengthen the advisory function by committing to more regular outputs, enhancing reporting to governing bodies, clarifying the possibility for the Management Committee and Boards to request advice, and ensuring that advisory work informs decision-making, particularly on systemic issues.	Laure-Anne Courdesse and Margaret Wachenfeld	Strengthening the visibility and effectiveness of EIB-CM's advisory function is key. As reflected in paragraphs 105–108, there is a framework for issuing advisory products, including upon request from the EIBG Governing Bodies (paragraph 105), and for reporting on these activities and their impact. The intention is to further develop this function in a structured manner and to enhance the reporting of its advisory work, including through its Annual Report, while respecting confidentiality constraints. For these reasons, the draft new EIB-CM Policy preserves flexibility regarding the frequency and format of advisory outputs.
2.	It was suggested to strengthen the advisory dimension of the Policy by establishing a more structured engagement with the Boards of Directors on systemic issues arising from casework. In particular, the introduction of periodic advisory outputs addressed to the Boards, including on lessons learned and recurrent issues, and the possibility for the Boards to request additional advisory products, was proposed.	Urgewald	The EIBG Governing Bodies will receive all the reports produced by the EIB-CM as well as the SRAPs (paragraph 115) and may request a discussion in relation to those documents at any time. Furthermore, the EIBG Governing Bodies will also be informed whenever there are divergent views in relation to SRAPs (paragraph 79).
3.	In respect to advisory, the draft EIB-CM Policy should be better aligned with the EIB Group Evaluation Policy, particularly regarding the Board's role in using evaluation reports and ensuring accountability. The EIB-CM's advisory function should be used effectively and transparently to inform decision-making and share insights on systemic issues with external stakeholders. It also recommends issuing periodic public advisory notes and monitoring and reporting annually on how the EIB Group takes up this advice.	Joint CSO Comments (section v)	The above notwithstanding, adjustments were made to this Section to enhance its advisory mandate. The EIBG Governing Bodies also commit to ensure that the EIB-CM has the necessary resources and budget to ensure it can effectively deliver on its mandate and perform its functions as per the draft new EIB-CM Policy (paragraph 18).

Question 13– Outreach: Please provide your comments on the provisions related to outreach activities of the EIB Group Complaints Mechanism under the draft new EIB-CM Policy.

Ref	Summary of Contributions	Contributor	Response
1.	The EIB-CM Policy should pursue a differentiated outreach for vulnerable people. The EIB-CM should systematically investigate the performance of project promoters with respect to the obligation to inform project-affected people about its existence and use.	Joint CSO Comments (section vii)	The points raised are relevant to inform the overall outreach strategy of the EIB-CM. The draft new EIB-CM Policy (paragraph 109) sets forth that the mechanism will develop and publish an outreach strategy. The related provisions were adjusted to reflect that a special focus will be put on outreach to vulnerable people and that the outreach function of the EIB-CM complements the obligation of clients/promoters towards the setting up of grievance mechanisms, and disclosure of available avenues to raise concerns.
2.	Concerns were raised that, despite improvements, practical barriers to access remain, particularly for vulnerable groups, including children and youth. It was suggested to enhance accessibility through more flexible submission channels (e.g. oral, local language, or via intermediaries), expanded outreach, and the use of alternative communication methods.	Save the Children (2.7)	Accessibility and the effective implementation of the EIB-CM mandate depend on its ability to engage effectively with stakeholders. According to the draft new EIB-CM Policy, the EIB-CM will carry out outreach activities, now guided by a published strategy, to raise awareness of its mandate and functions, including through cooperation with other IAMs and CSOs. These efforts target a broad range of stakeholders, while the EIBG supports visibility by ensuring easy access to the EIB-CM website and requiring clients/promoters not to impede access to the EIB-CM.
3.	There should be a proactive outreach and awareness-raising in project-affected areas, including during the project preparation phase.	Hamu Geredo, New Planet Alliance (section 3.2)	
4.	The comment notes that, despite formal eligibility provisions, practical barriers continue to limit access to the complaints mechanism, particularly for communities in developing countries. It calls for improved accessibility measures, including multilingual and offline submission options, as well as greater collaboration with local civil society organisations for outreach. It is further highlighted that low awareness of complaint mechanisms in developing regions limits their accessibility. It calls for targeted outreach efforts, particularly in Africa and fragile contexts, using locally adapted	Eng. Abdiaziz Ibrahim Sheikh	The draft new EIB-CM Policy already provides for a broad and inclusive access to the mechanism. As set out therein, any natural or legal person, irrespective of age, as well as authorised representatives or civil society organisations, may submit a complaint. The draft new EIB-CM Policy also allows representatives to act on behalf of affected persons, including where such persons may not be in a position to submit a complaint themselves, for instance due to vulnerability, age, or other constraints. While complaints must be submitted in writing, the draft new EIB-CM Policy provides for multiple submission channels,

Ref	Summary of Contributions	Contributor	Response
	communication channels such as local languages, community radio, and digital platforms.		including electronic submission, email, or delivery through EIB offices in the EU or abroad. As per the provisions under section “admissibility determination” the EIB-CM will also reach out to complainants in the event additional information is required for the purpose of determining admissibility. This approach aims to ensure accessibility while maintaining a clear and consistent procedural framework. The considerations made in the referred comments are valuable feedback to inform the future EIB-CM outreach strategy (paragraph 109).
5.	The draft EIB-CM Policy should explicitly require the EIB-CM to apply a gender lens and consider the differentiated impacts of projects on women, children, Indigenous Peoples, and other marginalised groups throughout its work.	Hamu Geredo, New Planet Alliance (section 7)	The consideration of gender issues and of the impacts of EIBG projects on vulnerable people is constant throughout the handling of complaints by the EIB-CM and is underpinned by the EIBG ESSF. The Section on outreach was revised to include a reference to vulnerable people.
6.	It could be beneficial to systematically include, for each financed project, a simple infographic in the local language explaining the complaint mechanism. This should be proactively shared with all stakeholders to ensure that communities feel engaged in upholding environmental and social standards and are aware of how to easily file a complaint. Others stakeholders should also feel more accountable for complying with the various standards, as all stakeholders would have been informed about the possible complaints that can be filed.	International Organisation of Employees	The obligation for the clients/promoters to disclose information about grievance mechanisms, including the EIB-CM, is provided for in the ESSF.

Question 14– Cooperation with other IAMs: Please provide your comments on the provisions related to cooperation between the EIB Group Complaints Mechanism and other Independent Accountability Mechanisms under the draft new EIB-CM Policy.

Ref	Summary of Contributions	Contributor	Response
1.	It was suggested to strengthen the provision of paragraph 109 on cooperation with other IAMs by moving from a discretionary to a more systematic approach to collaboration and information-sharing, while taking into account relevant considerations such as complainants' views.	Laure-Anne Courdesse and Margaret Wachenfeld	The need to inform other IAMs of the existence of complaints and the collaboration duties result from the rules that each IAM that is part of the IAM Network agrees to apply. Paragraph 112 of the draft new EIB-CM Policy was adapted accordingly. This provision regulates how the EIB-CM collaborates with other IAMs, and it is made possible because these IAMs belong and adhere to common principles, which are the ones informing the IAM Network. It would be very challenging to introduce these principles in relation to entities or authorities that are external to the network.
2.	The draft EIB-CM Policy should address coordination between the EIB-CM and other accountability bodies, including national contact points, human rights bodies, and partner institution mechanisms, to avoid duplication and ensure complementarity.	Hamu Geredo, New Planet Alliance (section 7)	
3.	It was suggested to further clarify cooperation provisions (paragraph 110) by considering differences in approaches to handling reprisals, and to explicitly reflect the principle of “no dilution of rights for complainants” in the context of collaboration with other IAMs.	Laure-Anne Courdesse and Margaret Wachenfeld	
4.	It was suggested to clarify how the respective applicable IAMs policy provisions are determined in mutual reliance arrangements, including by ensuring that the most stringent applicable requirements across participating IAMs are applied, so as to maintain a high level of protection for complainants.	Anonymous	
5.	Suggestion to inform the other IAM, instead of “consider informing”, or explain what are the considerations we take into account when we decide to inform or not.	Marjanne Servenant	Informing other IAMs of admissible complaints reflects good practice and is in line with collaboration duties resulting from being part of the IAM network. Paragraph 112 was adapted accordingly.

Ref	Summary of Contributions	Contributor	Response
6.	"Shall endeavour to collaborate": will this depend on the lending structure; will there be a difference between A and B lender?	Marjanne Servenant	Collaboration depends on many factors, including the lending structure, but also the willingness of the external parties, the existence of related complaints with the other IAM, etc. The provision has therefore been formulated to allow for such cooperation where relevant.

DRAFT

Question 15– Reporting : Please provide your comments on the provisions related to reporting activities of the EIB Group Complaints Mechanism under the draft new EIB-CM Policy.

Ref	Summary of Contributions	Contributor	Response
1.			
2.			

DRAFT

Section V – Final provisions

Question 16– Please provide your comments on the final provisions of the draft new EIB-CM Policy.

Ref	Summary of Contributions	Contributor	EIB comment
1.	Concern was raised about linking the Policy's entry into force to the approval of new Procedures, as this may create interim uncertainty; reconsideration of this approach was suggested.	Laure-Anne Courdesse and Margaret Wachenfeld Urgewald	Considering these comments and the fact that the draft new EIB-CM Policy is a comprehensive document that offers sufficient predictability in terms of process, it was decided to add some missing elements of procedural nature and useful for the public in the draft new EIB-CM Policy (such as certain timelines), instead of developing separate procedures and subject the entry into force of the new EIB-CM Policy to their approval. Paragraph 123 on the entry into force of the new EIB-CM Policy was changed accordingly.
2.	CM Procedures should be incorporated into the Policy. If not, the Procedures should be consulted with the public, in line with best practice among IAMS (e.g. IFC CAO and EBRD IPAM).	Joint CSO Comments (general comment) Urgewald	
3.	Concerns were raised that making the Policy's effectiveness conditional on the adoption of the Procedures may create risks of misalignment between the approved Policy and its subsequent implementation, including potential impacts on independence and complainants' rights. In particular, it was noted that provisions in the Procedures allowing escalation by EIBG Services at multiple stages could risk undermining the EIB-CM's operational independence by introducing potential interference in key steps and delays in the handling of complaints. Clarification of transitional arrangements was also suggested.	Urgewald	
4.	In respect to paragraph 121, the Head of the EIB-CM should have the authority to interpret the Policy, subject to review for maladministration by the European Ombudsman.	Joint CSO Comments (section II)	There is no need to include a provision that potential maladministration can be reviewed by the European

Ref	Summary of Contributions	Contributor	EIB comment
			Ombudsman as this is part of the EU law and results directly from the Treaty on the Functioning of the European Union. The interpretation of the new EIB-CM Policy should be under the auspice of the Group Chief Ethics and Accountability Officer (formerly the Inspector General) to ensure objective and consistent application of the Policy by the higher-ranking position in the EIBG Office of Ethics and Accountability (formerly the Inspectorate General). The Policy was adapted to include that the Group Chief Ethics and Accountability Officer (formerly the Inspector General) will consult with the Head of the EIB-CM.
5.	There should be clear deadlines for disclosure in the EIB-CM Policy	Hamu Geredo, New Planet Alliance (section 2.2)	In practice, whenever there is a requirement to publish information or documents on the EIB-CM website, the EIB-CM does this within a short period of time. This is considered sufficient as it sets an obligation for publication and disclosure. Some timelines for disclosure of report were however added to the text.
6.	Any future review of the EIB-CM Policy should be preceded by structured outreach to affected communities and civil society organisations, not only institutional stakeholders.	Hamu Geredo, New Planet Alliance (section 7)	Paragraph 128 expressly says that a future review needs to take into consideration the comments expressed by the relevant stakeholders (including CSOs).

Annex

Question 17– Please provide your comments on the annex to the draft new EIB-CM Policy.

Ref	Summary of Contributions	Contributor	EIB comment
1.			
2.			

DRAFT