



Public consultation on the EIB Group Environmental and Social Sustainability Framework

Draft Public Consultation Report

Introduction

1. This report summarises the public consultation process on the review of the EIB Group Environmental and Social Sustainability Framework (ESSF). A timeline of the process is provided in Annex 1. An overview of the contributions received and how they were taken into account in the review is provided in the issues matrix.
2. As enshrined in the [EIB Group Transparency Policy](#), the EIB is committed to engaging, on a voluntary basis, in formal public consultation on selected policies. This participatory process allows external stakeholders to participate in the preparation and review of policy documents.
3. The environmental and social regulatory and policy landscape has changed enormously since the currently applicable 2009 Statement came into being. The European Union (EU) is at the forefront of tackling the climate and environment crisis and the European Green Deal is at the heart of those efforts. The Green Deal has important implications right across the EIB Group. Not least of these is the requirement to embrace the package of legislation set out in the Commission's Sustainable Finance Action Plan. It places Environmental, Social and Governance (ESG) principles at the heart of all economic activity. This means that EIB Group core policy position on environmental and social matters has to reflect the sustainable finance imperatives, which means working alongside and within the sustainable finance agenda and its framework – all to ensure Europe meets the objectives of the Green Deal. The EIB Group has committed to align its environmental and social criteria with the EU Taxonomy. The Sustainable Finance framework is therefore one of the main drivers behind the revision of the ESSF.
4. In addition, a number of our peer institutions have either recently undergone or are undertaking a revision of their own frameworks. It is important that the Group takes into account the evolution in the policy making of its peers and their approaches to, and implementation of, their respective environmental and social standards and requirements. This will allow for alignment in co-financing and lead to effective development outcomes.
5. Finally, lessons learned through complaints lodged with the EIB Group Complaints Mechanism (EIB-CM) and the European Ombudsman (EO), European Parliament evaluation reports (in particular on the External Lending Mandate and Investment Facility (Cotonou)) and its annual reports on the EIB have also fed into the review of the Framework.

The public consultation process

6. The public consultation opened on 3 June 2021 with the publication of a new EIB Group Environmental and Social Policy, the revised drafts of the 10 existing Environmental and Social Standards, and an entirely new draft Standard dedicated to the EIB's intermediated lending. These documents were accompanied by an explanatory note (with a dedicated section on the EIB approach to human rights) and a consultation questionnaire¹ and were made available on a dedicated public consultation website in two languages – [English](#) and [French](#). Information about the consultation, including the explanatory note, consultation questionnaire, Standards 6 and 7

¹ All documents are available on the public consultation website: <https://consult.eib.org/consultation/essf-2021-en/>

- were also made available in [Spanish](#) and [Portuguese](#) in order to facilitate the participation of relevant stakeholders, such as Indigenous Peoples.
7. Members of the public were invited to submit written contributions by 6 August 2021. Contributions could be sent by filling in the questionnaire, either online or in its Microsoft Word format, or via email to a dedicated address. Respondents were given the option to withhold consent for the publication of their personal data.
 8. In order to reach a broad number of stakeholders, the EIB raised awareness about the public consultation through social media and targeted emails (e.g. to subscribers to the [EIB Civil Society mailing list](#)) at several key moments during the process. The EIB's direct mailings reached over 4500 individuals and organisations.
 9. In addition, the EIB reached out to almost 400 large international networks, inviting them to share information about the public consultation with their members. The EIB would like to thank all stakeholders that helped raise awareness about the consultation.
 10. The EIB also held bilateral meetings with institutional partners such as other European institutions, bodies and agencies, other DFIs and IFIs as well as UN agencies.
 11. A series of 13 informational webinars took place between 21 June and 9 July 2021. They provided an opportunity for the EIB to give participants an overview of the key issues at stake and the main proposed amendments. The webinars were open to all members of the public. Table 1 below gives an overview of the number of external stakeholders that participated, engaging in a lively and constructive discussion about the issues at stake within the review. The slides presented during the webinar and a summary of the discussions are published on the [consultation website](#).

Table 1 – number of external stakeholders that participated in informational webinars

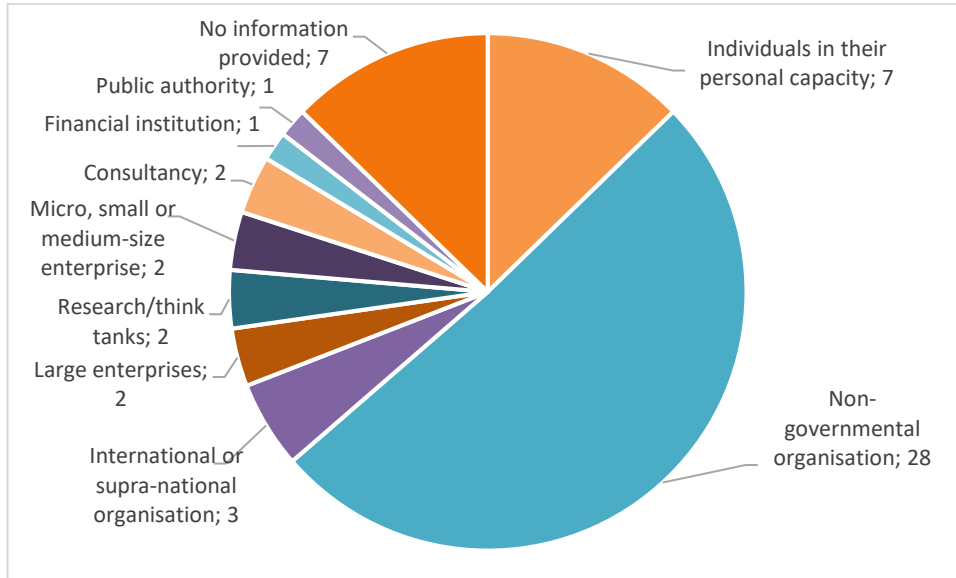
Webinar	External participants
Policy	133
Human Rights	56
Standard 1	105
Standard 2	51
Standard 3	43
Standard 4	52
Standard 5	71
Standard 6	35
Standard 7	38
Standard 8	39
Standard 9	32
Standard 10	23
Standard 11	46

12. 73 organisations and individuals responded to the consultation, submitting the 55 contributions listed in Annex 2 and published on the [consultation website](#).

13. Figure 1 below shows the contributions by **type of respondents**:

- 48 contributions (87.3%) were submitted on behalf of organisations, specifically: 28 (50.9%) non-governmental organisations; 3 (5.5%) international or supra-national organisations; 2 (3.6%) large enterprises; 2 (3.6%) research/think tanks; 2 (3.6%) micro, small or medium-size enterprise; 1 (1.8%) financial institution; 1 (1.8%) public authority; 2 (3.6%) consultancy. 7 (12.7%) contributors did not respond.
- 7 contributions (12.7%) were submitted by individuals in their personal capacity.

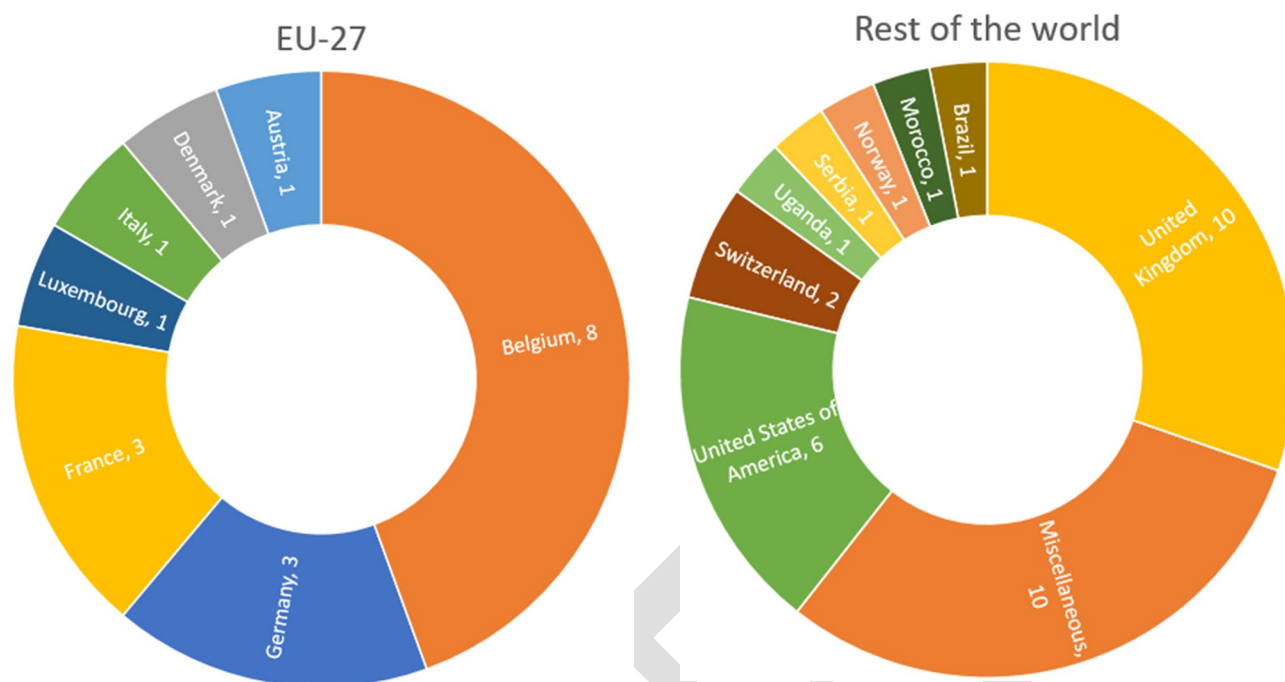
Figure 1 – Contributions by type of respondents



14. Figure 2 below shows the **contributions by geographical origin**:

- 22 contributions (40%) originated from the EU-27, specifically: 8 (15%) from Belgium, 4 (7%) from The Netherlands; 3 (5%) from France; 3 (5%) from Germany; 1 (2%) from Austria; 1 (2%) from Denmark, 1 (2%) from Italy; 1 (2%) from Luxembourg.
- 23 contributions (42%) originated from the rest of the world, specifically: 10 (18%) from the United Kingdom; 6 (11%) from the United States of America; 2 (4%) from Switzerland; 1 (5%) from Brazil; 1 (5%) from Morocco; 1 (5%) from Norway; 1 (5%) from Serbia and 1 (5%) from Uganda.
- 10 (18%) contributions are listed as “miscellaneous”, mainly due to the fact that the majority of these 10 contributions were joint contributions made on behalf of numerous organisations located worldwide.

Figure 2 – Contributions by geographical origin



15. As regards the **language of contributions**, 53 (96%) were in English and 2 (4%) were in French.

The review process

16. The feedback from the contributions was consolidated into an issues matrix, which reflects the structure of the consultation questionnaire. A final section contains more general suggestions and comments that did not answer specific questions or suggest specific amendments to the draft texts of the EIB Group Environmental and Social Policy or the 11 Environmental and Social Standards. Individual submissions or topics may thus be addressed in several parts of the matrix.
17. The EIB set up an Inter-Directorate Review Panel (IDRP) to consider all contributions, draft responses and amend the draft ESSF as appropriate. The IDRP consisted of members of the EIB Group's staff with expertise and interest in the ESSF. It was chaired and managed by the Civil Society Division (part of the Secretariat General, Corporate Responsibility Department).
18. Following the IDRP's work, the EIB Group's reasoned comments on stakeholders' contributions were included in the issues matrix, explaining the EIB Group's position on the suggestions received and whether they were integrated into the draft revised ESSF.
19. The Management Committee approved the draft revised ESSF, the draft consultation report and the issues matrix on 15 December 2021. These documents were published for information on the consultation website on 12 January 2022, i.e. within the period of 15 working days prior to the Board of Directors meeting as stipulated in the EIB Group Transparency Policy. The Board of Directors is expected to discuss the ESSF on 2 February 2022.
20. The final revised ESSF, as adopted by the Board of Directors, will be published on the EIB's website in all official languages of the European Union.

Annex 1**Timetable of the public consultation process**

Date	Event
3 June 2021	Launch of the public consultation
21 June-9 July 2021	Online informational webinars
6 August 2021	Deadline for submitting contributions to the consultation
From 9 August 2021	Publication of contributions
12 January 2022	Publication of the draft revised ESSF, draft consultation report and EIB Group reasoned responses to contributions
2 February 2022	Meeting of the Board of Directors to decide on the draft revised ESSF
February 2022 (indicative)	Publication of the ESSF, as adopted by the Board of Directors

Annex 2

List of respondents

Public consultation on the EIB Group Environmental and Social Sustainability Framework (ESFF)
List of contributions

#	Contribution	Country
1	Accountability Counsel	United States of America
2	Akuo Energy	EU France
3	AVSI Foundation	EU Italy
4	Bpifrance	EU France
5	CDP Europe	EU Germany
6	Columbia Center on Sustainable Investment	United States of America
7	Compassion in World Farming EU	EU Belgium
8	Counter Balance	EU Belgium
9	Deep Sea Mining Campaign	United Kingdom
10	East African Development Bank	Uganda
11	EcoCa Ltd	United Kingdom
12	EuroGroup for Animals	EU Belgium
13	EuroNatur Foundation	EU Germany
14	European Network on Debt and Development (Eurodad)	EU Belgium
15	European Network on Independent Living (ENIL)	EU Belgium
16	Fairr	United Kingdom
17	Forest Peoples Programme	United Kingdom
18	FOUR PAWS	EU Austria
19	GAIA	International network, USA
20	Germanwatch e.V.	EU Germany
21	GoodCorporation	United Kingdom
22	Green Growth Horizontal Project - Interreg MED Programme	Europe
23	Institution of Occupational Safety and Health	United Kingdom
24	International Council on Monuments and Sites (ICOMOS)	EU France

25	International Labour Organization (ILO)	Switzerland
26	International Trade Union Confederation/Global Unions Washington Office	United States of America
27	Matthew Arndt	Unknown
28	Ministry of Agriculture, Nature and Food Quality of the Netherlands	EU the Netherlands
29	Mohamed Miftah	Morocco
30	NomoGaia	United States of America
31	Office of the United Nations High Commissioner for Human Rights (OHCHR)	Switzerland
32	Partnership for Biodiversity Accounting Financials (PBAF)	EU the Netherlands
33	Protimos	United Kingdom
34	Saami Council	Norway
35	Sinergia Animal	Brazil
36	Slavenko Grurevic	Serbia
37	The European Expert Group on the Transition from Institutional to Community-based Care (EEG)	EU Belgium
38	The Nature Conservancy	United Kingdom
39	World Animal Protection	United Kingdom
40	World Federation for Animals	United States of America
41	WWF European Policy Office	EU Belgium
42	Zero Waste Europe	EU the Netherlands
43	Confederation of Danish Employers	EU Denmark

Joint contributions

#	Contribution	Country
44	Joint contribution 1 <i>Accountability Counsel, ActionAid International, Alliance of Associations Polish Green Network, Arab Watch Coalition, Bankwatch, Both ENDS, Counter Balance, Ecoaction (Ukraine), FIDH, Focus Association for Sustainable Development Slovenia, Green Liberty (Latvia), Nomogaia, Recourse, Za Zemiata (Bulgaria)</i>	Miscellaneous
45	Joint contribution 2 <i>Accountability Counsel, ActionAid International, Alliance of Associations Polish Green Network, Arab Watch Coalition, Bankwatch, Both ENDS, Counter Balance, Ecoaction (Ukraine), FIDH, Focus Association for Sustainable Development Slovenia, Green Liberty (Latvia), Recourse, Za Zemiata (Bulgaria)</i>	Miscellaneous

46	Joint contribution 3 <i>Accountability Counsel, ActionAid International, Alliance of Associations Polish Green Network, Arab Watch Coalition, Bankwatch, Both ENDS, Counter Balance, Ecoaction (Ukraine), FIDH, Focus Association for Sustainable Development Slovenia, Green Liberty (Latvia), International Accountability Project, Recourse, Za Zemiata</i>	Miscellaneous
47	Joint contribution 4 <i>Accountability Counsel, Alliance of Associations Polish Green Network, Arab Watch Coalition, Bankwatch, Both ENDS, Counter Balance, Ecoaction (Ukraine), Eurodad, Focus Association for Sustainable Development Slovenia, Friends of nature EKO ELEMENT Bugojno (Bosnia and Herzegovina), Global Responsibility - Austrian Platform for Development and Humanitarian Aid, Green Liberty (Latvia), Nomogaia, Organic Agriculture Association (OAO), Recourse, Za Zemiata (Bulgaria)</i>	Miscellaneous
48	Joint contribution 5 <i>Alliance of Associations Polish Green Network, Arab Watch Coalition, Bankwatch, Both ENDS, Counter Balance, Ecoaction (Ukraine), Focus Association for Sustainable Development Slovenia, Green Liberty (Latvia), Recourse, Za Zemiata (Bulgaria)</i>	Miscellaneous
49	Joint contribution 6 <i>ActionAid International, CEE Bankwatch Network, Both ENDS, Counter Balance, Eurodad</i>	Miscellaneous
50	Joint contribution 7 <i>A11 - Initiative for Economic and Social Rights (Serbia), Accountability Counsel, ActionAid International, Alliance of Associations Polish Green Network, Arab Watch Coalition, Armenian Forests NGO, Bankwatch, Both ENDS, Counter Balance, Ecoaction (Ukraine), Ecolur, Environmental Paper Network, Biomass Finance Working Group, Eurodad, FIDH, Focus Association for Sustainable Development Slovenia, Global Responsibility - Austrian Platform for Development and Humanitarian Aid, Green Armenia Environmental Education NGO, Green Liberty (Latvia), International Accountability Project, NGO Ecoclub, ReCommon, Recourse, Urgewald, Uzbek Forum for Human Rights, Za Zemiata</i>	Miscellaneous
51	Joint contribution 8 <i>Both ENDS and Eurodad</i>	EU Belgium

Anonymous responses

#	Contribution	Country
52	Response 1028822717*	EU the Netherlands
53	Response 661456814*	United Kingdom
54	Response 808951905*	EU Luxembourg

Responses awaiting consent confirmation

#	Contribution	Country
55	Consent for the publication of personal details is awaited. The contribution will be published accordingly.	Unknown

* The respondent has not consented to the publication of his/her personal data