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Transport Lending Policy

Consultation Report

21 June 2022



**European
Investment
Bank**

The EU bank 

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Transport Lending Policy: Consultation Report

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Public consultation on the EIB Transport Lending Policy

Public Consultation Report

Introduction

1. This note provides a brief overview of the results from the external public consultation on the Bank's Transport Lending Policy (TLP).
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 Bank's current Transport Lending Policy (TLP) was approved in December 2011. A review and revision of the TLP was launched in 2021 with a view to aligning it with the Paris Agreement; the EC's Green Deal as well as its Smart and Sustainable Mobility Strategy; the EU Taxonomy for Sustainable Activities; and with the EIB Group's own Climate Bank Roadmap (CBR).
4. The public consultation on the revision of the TLP was the first public consultation of an EIB sector lending policy after the approval of the CBR. The fact that the CBR defines Paris alignment criteria for EIB support – in effect defining EIB eligibilities for all sectors of the Bank's activity – changes the nature of sector lending policies. It has therefore been of critical importance to explain the proper scope of the public consultation exercise and to manage external stakeholder' expectations. In full alignment with the CBR, the final TLP will articulate the EIB's priorities in supporting the transport sector. The public consultation invited the external stakeholder community to express their views on such priorities – and on the challenges facing the transport sector that necessitate EIB and broader public support.

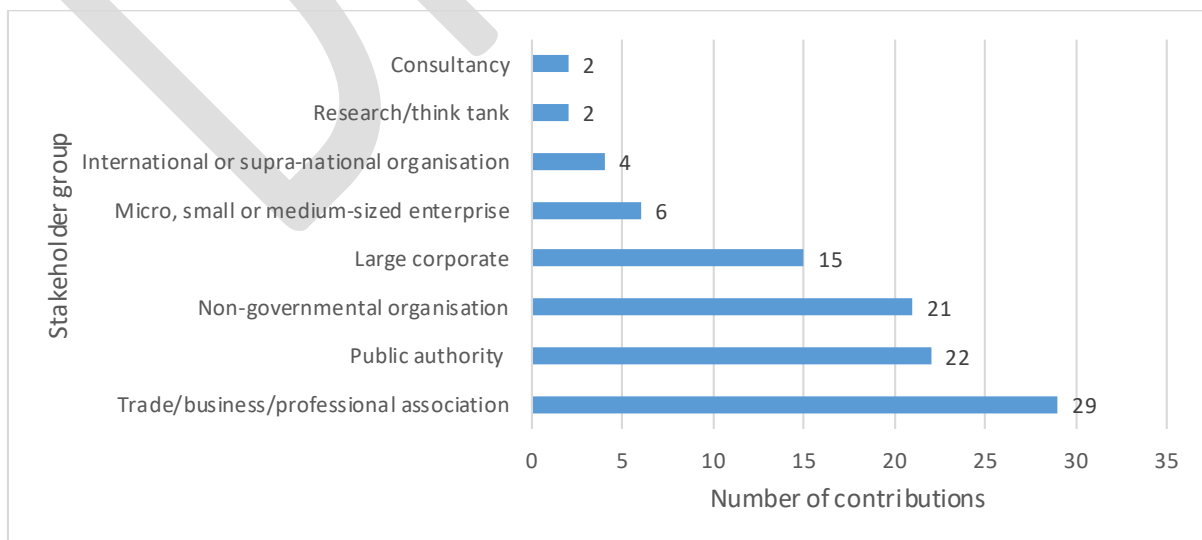
The public consultation process

5. The public consultation opened on 26 July 2021 with the publication of a consultation document, which included a questionnaire, and was made available on a dedicated public consultation website in three languages – English, French and German.
6. Members of the public were invited to submit written contributions by 29 October 2021. The questionnaire could be filled in either online or in its Microsoft Word format, or sent via email to a dedicated email address. Respondents were given the option to withhold consent for the publication of their personal data.
7. 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 local offices were invited to provide key contacts at a local level, and to share the information also via their own networks. The EIB's direct mailings reached over 3500 individuals and organisations. Large associations and networks were invited to share the information with their members. The EIB would like to thank all stakeholders that helped raise awareness about the consultation.
8. The EIB also held bilateral meetings with institutional partners such as other European institutions and UN agencies.
9. A full day of informational webinars took place on 14 October 2021. 8 breakout sessions provided an opportunity for the EIB to give participants an overview of the key issues at stake, hear first hand from stakeholders and answer any questions. The webinars were

open to all members of the public. Approximately 190 participants took part throughout the day. The slides presented during the webinars and a summary of the discussions are published on the [consultation website](#).

10. The external public consultation of the TLP attracted a total of 118 responses from the Bank's external stakeholders. The full list of respondents is available [here](#). For comparison, the number of responses to the recent public consultation on the Bank's Environmental and Social Sustainability Framework was 55; to the stakeholder consultation on the CBR last year some 200; and to the public consultation on the Bank's Energy Lending Policy in 2019 about 160. All contributions are published on the [consultation website](#), both as individual contributions, but also in an excel spreadsheet providing stakeholders with the ability to see all responses to specific questions, as posed in the consultation questionnaire.
11. There was good **linguistic diversity** in the responses to the public consultation. Of the 118 responses 100 were made in English; 11 in French; 5 in German and 2 in Portuguese.
12. Considering the distribution of respondents by stakeholder group, shown in Figure 1 below, the public consultation on the revision of the TLP was unusual in that non-governmental organisations did not constitute the single largest group of respondents, as has been the case in earlier public consultations. Efforts by Bank services to mobilise a wide variety of external stakeholders paid off, and public authorities as well as in particular trade, business and professional associations representing the transport sector participated actively both in the consultation event and in the formal consultation by providing written responses. Figure 1 below shows the contributions by **type of respondents**.
13. As regards the group of **public authorities**, government ministries from 6 Member States (the Czech Republic, France, Poland, the Netherlands, Romania and Austria) submitted formal responses, as did 1 regional government ministry (from Bavaria in Germany) and 9 municipalities (all Portuguese).
14. 83% of responses were received from representatives of organisations, with only 17% therefore coming from individuals responding in their personal capacity. 30% of stakeholders requested anonymity.

Figure 1 – Contributions by type of respondents



15. Figures 2 and 3 show the **contributions by geographical origin**. The geographical distribution of responses was heavily skewed towards the EU, as shown in the following two graphs. Some 92% of all responses originated from the EU. The EU responses came from as many as 19 Member States. The large number of responses from Belgium is explained by the fact that many trade, business and professional associations as well as non-governmental organisations are located in Brussels:

Figure 2 – Contributions received from stakeholders located within the EU

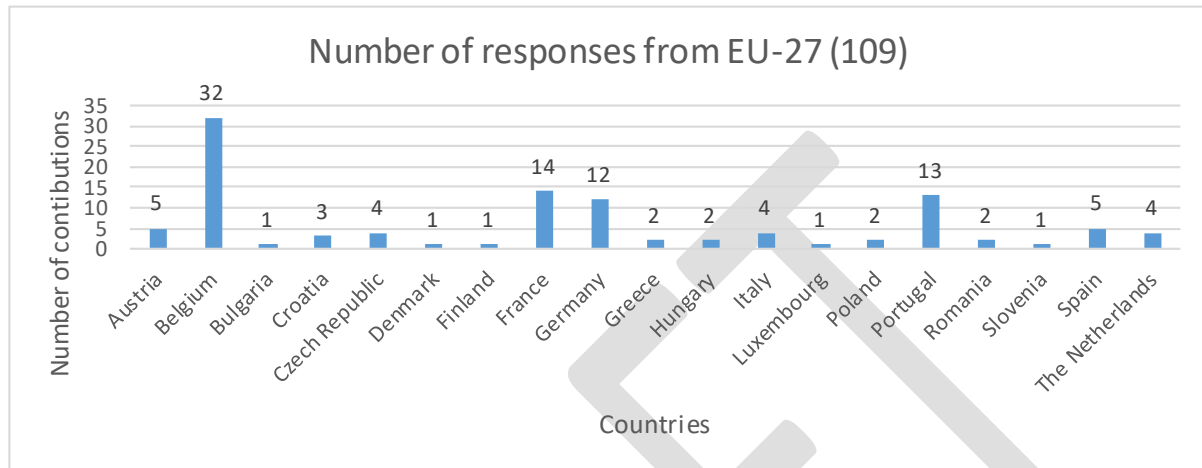
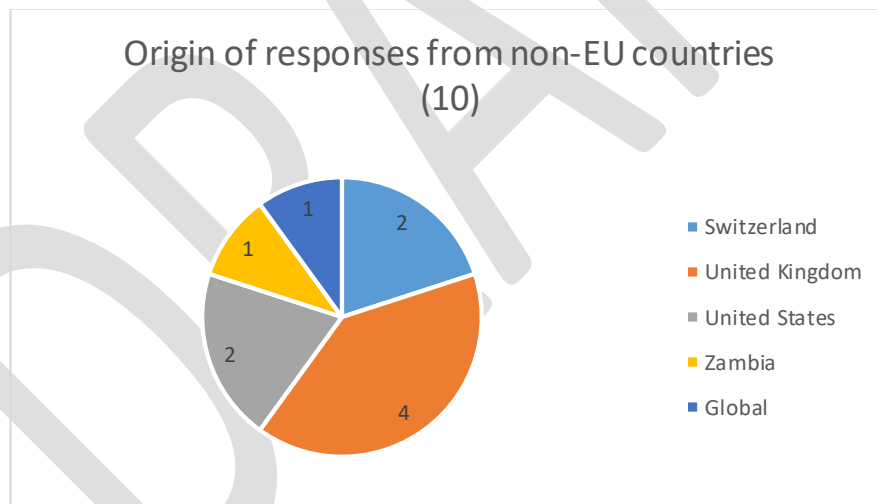


Figure 3 – Contributions received from stakeholders located outside the EU



16. The majority of respondents had heard about the consultation through our targeted email campaign – either directly (49%) or from a colleague (31%). Meetings and events with EIB staff constitutes a lot of the “other” (34%) cases registered and the remaining 20% were informed through the EIB’s website, social media channels or the press.

17. 47% of respondents indicated that this was the first time that they were engaging with the EIB and, perhaps just as interesting, 33% of respondents were not familiar with the TLP at all before this consultation.

Summary of contributions received

18. The key points raised in the contributions received are summarised below.
19. Stakeholders ranked decarbonisation as well as the resilience of transport infrastructure to climate change as the main challenges facing the transport sector.
20. On the other hand, fewer stakeholders saw the safeguarding of equal accessibility or balanced development as key challenges for the transport sector.
21. Stakeholders' views concerning the future evolution of transport demand, and hence the need for additional infrastructure capacity, varied widely, ranging from those expecting a significant increase to those seeing a significant reduction as a necessity.
22. A number of NGOs called for the EIB to stop supporting certain modes of transport, notably road and maritime transport as well as aviation.
23. At the same time, among other stakeholder groups there was a rather broad endorsement for continued EIB support to all modes of transport and their decarbonisation, both inside and outside the EU.
24. A clear majority of respondents saw a role for a wide range of alternative fuels in transport, depending on the mode and distance of transport.
25. Stakeholders expressed a wide variety of views of how the EIB should prioritise its support. Some suggested that the prioritisation be based on the decarbonisation need or potential of individual modes of transport; others favoured outright exclusions of certain modes from EIB support; and a few respondents referred to cost-benefit analysis as the prioritisation tool of choice.
26. Public transport was widely considered by stakeholders as a means to promote accessibility, balanced development and the decarbonisation of urban transport, and hence a priority for EIB support.
27. The modal share of rail transport is generally expected to grow. Among the frequently suggested priorities for EIB support are the electrification of rail transport; zero-emission trains; and cross-border rail links.
28. To decarbonise road transport, respondents referred most frequently to the adoption of alternative fuels and also to modal shift, especially in long distance transport.
29. In waterborne transport, decarbonisation is considered as a major challenge. The use of LNG as a transition fuel is clearly a contentious issue among some stakeholder groups.
30. Many stakeholders see airport infrastructure supporting decarbonisation a priority for EIB support to the aviation sector, alongside support to the adoption of sustainable aviation fuels and the Single European Sky.

The review process

31. The feedback from the contributions has been consolidated into an issues matrix, which reflects the structure of the consultation questionnaire. Transport experts have reviewed all comments made with a view to presenting the EIB's reasoned comments to stakeholders' contributions.
32. The EIB set up an Inter-Directorate Review Panel (IDRP). The IDRP consisted of members of the EIB Group's staff with expertise and interest in the TLP. It was chaired and managed by the Civil Society Division (part of the Secretariat General, Corporate Responsibility Department).

33. The IDRPs reviewed the draft issues matrix and draft revised TLP before submission to the EIB's governing bodies.
34. At least 15 working days prior to the Board of Directors meeting, and as stipulated in the EIB Group's Transparency Policy, the draft TLP was published on the EIB's website, alongside the draft issues matrix and draft consultation report. The Board of Directors is expected to discuss the TLP in July 2022.
35. The final revised TLP, as adopted by the Board of Directors, will then be published on the EIB's website.

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Annex 1

Timetable of the public consultation process

Date	Event
26 July 2021	Launch of the public consultation
14 October 2021	Online informational webinars
29 October 2021	Deadline for submitting contributions to the consultation
21 June 2022	Publication of the draft revised TLP, draft consultation report and EIB Group reasoned responses to contributions
13 July 2022	Meeting of the Board of Directors to decide on the draft revised TLP

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