

23 June 2021

NGOs letter on the EIB's review process of the Environmental and Social Sustainability Framework

To EIB Secretary General - Marjut Falkstedt

Dear Ms Falkstedt,

We, the undersigned organisations, welcome the EIB's initiative to review its Environmental and Social Sustainability Framework. However, we wish to express concerns about the public consultation process foreseen by the EIB and propose a way to address these.

The proposed process excludes a large number of EIB's stakeholders from meaningful participation in a proposed review. Considering the bank's commitment to strengthen its development finance work, it is regrettable that it has put in place a process that does not allow for adequate consultation with those most exposed to impacts of its development operations.

First, in comparison to public consultations on the bank's sectoral policies, for example the Energy Lending Policy review which took place in 2019, this process is considerably shorter, with less than two months for stakeholders to share comments, and being held right in the middle of the summer and holiday season in most countries. This is not commensurate with either the significance of the Environmental and Social Sustainability Framework for the EIB's operations globally, or with the volume and scope of documentation subject to public consultation.

Secondly, despite its global impact and ambition to become the "EU development bank", the majority of documents presented for consultations are only available in English and French and only two standards are also available in Spanish and Portuguese. Other international languages spoken in the regions where the EIB operates, such as Russian or Arabic, are missing. Similarly, translations to more languages are not available during the webinars.

We understand the desire to finalise the Framework by the end of 2021, but believe this should not go at the cost of having inclusive and meaningful consultations. Given the advanced stage of preparations of the review and public webinars, we are calling on the EIB to amend the review process by postponing the deadline for written comments until the end of September 2021, and scheduling a second stage in the consultation process acknowledging language issues and different time zones. This proposed second stage would allow stakeholders to formulate comments on revised draft documents (the Policy and the 11 Standards). In addition, we recommend the EIB to publish draft Procedures for public consultation. We would be happy to share during a conversation further ideas on how to ensure transparency and meaningful participation in the policy revision.

The signatories of this letter assure you of their support in making the EIB a more sustainable institution with high environmental and social standards at the heart of its operations.

Sincerely,

Accountability Counsel
Action Aid International
ACT Alliance EU
Al Hayat Center for Civil Society Development (Jordan)
Arab Watch Coalition (MENA)
Association Talassemiane pour l'environnement et le développement-ATED (Morocco)
Association Tunisienne pour le Droit du Développement (Tunisia)
Both ENDS
Cairo Institute for Human Rights Studies (CIHRS), MENA region
CEE Bankwatch Network
Center for International Environmental Law (CIEL)
Community Empowerment and Social Justice Network (CEMSOJ), Nepal
Counter Balance
Ecoclub NGO (Ukraine)
Ecolor NGO (Armenia)
Espace de Solidarité et de Coopération de l'Oriental-ESCO (Morocco)
Eurodad
FIDH (International Federation for Human rights)
Forests of Armenia NGO (Armenia)
Green Alternative,(Georgia)
Green Armenia NGO (Armenia)
International Accountability Project
Just Finance International, VedvarendeEnergi
Lebanese Union for People with Disabilities (Lebanon)
Lebanon Eco Movement (Lebanon)
Onshor association Tunisia
Phenix Center for Economic and Informatics Studies-Jordan
Recourse
Resonate!Yemen (Yemen)
Studies and Economic Media Center (Yemen)
Urgewald
Uzbek Forum for Human Rights (Uzbekistan)
Wedyan Association For Society Development (Aden,Yemen)
WWF European Policy Office
Gender Action
Yemeni observatory for Human Rights
منظمة شؤون المرأة والطفل (Iraq)