

CEE Bankwatch Network  
Na Rozcesti 1434/6  
190 00 Praha 9 – Liben  
Czech Republic  
Email: main @bankwatch.org  
http://www.bankwatch.org

**Bulgaria:**

Centre for Environmental  
Information and Education  
(CEIE)  
For the Earth!

**Czech Republic:**

Centrum pro dopravu a  
energetiku  
Hnutí Duha

**Estonia:**

Estonian Green Movement–FoE

**Georgia:**

Green Alternative

**Hungary:**

Nature Protection Club of  
Eotvos Lorand University (ETK)  
National Society of  
Conservationists–FoE (NSC)

**Lithuania:**

Atgaja

**Macedonia:**

Eko–svest

**Poland:**

Polish Green Network (PGN)  
Institute of Environmental  
Economics (IEE)

**Russia:**

Sakhalin Environment Watch

**Slovakia:**

Friends of the Earth – Center  
for Environmental Public  
Advocacy (FoE–CEPA)

**Ukraine:**

National Ecological Centre of  
Ukraine (NECU)

CEE Bankwatch Network's  
mission is to prevent  
environmentally and socially  
harmful impacts of  
international development  
finance, and to promote  
alternative solutions and public  
participation.

NATIONAL ECOLOGICAL CENTRE OF UKRAINE  
52–A Saksagansky str., Kyiv, 01033, UKRAINE  
tel.: +380 (44) 238–6260, tel./fax: +380 (44) 238–6259  
necu@necu.org.ua | www.necu.org.ua

To:

[GSreview@ebrd.com](mailto:GSreview@ebrd.com)

One Exchange Square  
London EC2A 2JN  
United Kingdom

## Comments to the EBRD Draft Strategy for the Promotion of Gender Equality

We welcome the EBRD's release of the draft Strategy for the Promotion of Gender Equality as a continuation of its efforts in applying gender aspects in its operations and projects. Since early 2000s numerous development finance institutions have developed their gender policies and the EBRD should have taken into attention the lessons learnt from them<sup>1</sup> as well as the numerous recommendations given by NGOs at various meetings, policy' reviews, and projects–related communication. Thus, we note the advancement in the draft Strategy formulation since the times of the EBRD's Gender Action Plan (2009–2012) and Strategic Gender Initiative<sup>2</sup> (April 2013–May 2015) and we would propose the following comments and recommendations for further improvement of the draft Strategy for the Promotion of Gender Equality.

### 1. General comments and geographic coverage

The current draft document follows the Strategic Gender Initiative and broadens it. Among the Bank's aims of the strategy is *“to mainstream gender equality into the EBRD operations by 2020, as set out in the Strategic and Capital Framework 2016–2020”* and *“gender mainstreaming within the EBRD's operations is understood as the process by which the Bank, as part of its investments and policy dialogue, where relevant and adding value, addresses gender gaps and promotes equality between men and women.”*

It is clearly understood that the regions where the Bank is currently operating are diverse and “one size does not fit all”. However, we consider de–prioritising of some countries discriminative and it might represent as well lost opportunities for promotion of gender equality. Although gender gaps in some countries may appear smaller than in others, these gaps are not static and in the case of Ukraine they are widening.

1 <http://www.genderaction.org/publications/ifigenderpolicies.pdf>

2 <http://www.ebrd.com/downloads/sector/gender/strategic-gender-initiative.pdf>

### Box: Ukraine's widening gender gaps

Over the last years Ukraine's indexes for gender worsened and point to the worsening gender inequality situation in the country. For example, Ukraine was on the 83th place in the UNDP's Gender Inequality Index<sup>3</sup> in 2013 out of 187 countries, while the country occupied 57th place out of 146 countries just in 2011. The index itself represents three dimensions among which are empowerment and labour market participation. Thus GII value indicates present inequality between women and men (and vice-versa) and that there are problems with political rights realisation as there is low share of parliamentary seats held by women in the country and the situation is deteriorating over time. The equality of men and women in their political rights can be observed only at the level of the village councils where women occupy almost 50% as of January 1, 2013<sup>4</sup>.

Gender has been stated to be a priority for the Government of Ukraine and multiple actions have been taken to show this commitment in terms of robust legal framework to support gender equality, creation of a national gender equality machinery, creation of a National Program on Gender Equality, etc.<sup>5</sup>. However, many challenges and obstacles remain, especially in gender policy implementation, which explain and contribute to Ukraine's poor gender equality rankings. In reality it can be observed that there is non-prioritization of gender equality in national policy and administrative reforms; the non-integration of gender in national statistics, planning, budgeting, and monitoring and evaluation of government programs<sup>6</sup>.

The country currently faces the unseen situation because of the military conflict in the East Ukraine – as to the Ministry of Social Defence<sup>7</sup> around 1,4 people were forcedly resettled among which more than 60% are women<sup>8</sup> and children. The consequences of this internal migration are not fully studied yet, but obviously, gender aspects should be properly addressed.

**Recommendation:** The Bank's countries of operations should have a differentiated approach in the Strategy and all new country strategies should be developed to track gender equality results.

## 2. Corporate gender policies

a) There is understanding that *“limiting women's employment opportunity during transition has been the reduction in the social services which previously enabled women to work, such as state funded kindergartens, child-care and nurseries in both urban and rural areas”* and *“double burdens create role conflicts which then translate into lower career mobility as women attempt to balance the different demands placed on them”*.

The Strategy states that *“the full and efficient use of economic resources is an intrinsic characteristic of a well-functioning market economy”*. But this approach is too focused on the efficient utilization of women's work and the *“work-life balance”* mentioned in the draft Strategy is very welcomed.

“Family-friendly environment” means equality for men and women in utilizing the benefits of the responsible parenthood (both mothers and fathers) – provided with family-friendly workplaces where

<sup>3</sup> <http://hdr.undp.org/sites/default/files/hdr14-report-en-1.pdf>

<sup>4</sup> Ukraine. The National Overview of the Beijing Declaration and Platform for Action (1995) and the final documents of the UN General Assembly (2000) in the context of the 20<sup>th</sup> Anniversary of the World Conference on Women and adoption of the Beijing Declaration and Platform for Action in 2015. <http://mlsp.kmu.gov.ua/document/161464/t.doc>

<sup>5</sup> UKRAINE COUNTRY DEVELOPMENT COOPERATION STRATEGY 2012–2016.

[https://www.usaid.gov/sites/default/files/documents/1863/USAID\\_Ukraine\\_CDSCS\\_2012-2016.pdf](https://www.usaid.gov/sites/default/files/documents/1863/USAID_Ukraine_CDSCS_2012-2016.pdf)

<sup>6</sup> Complex Study of the Rural Women's Conditions (UKR), Secretariat of the Ombudsman

<http://www.ombudsman.gov.ua/files/alena/Doslidzhennya%20Sil's'ki%20zhinky.pdf>

<sup>7</sup> <http://www.unian.ua/society/1097293-v-ukrajini-narahuvali-137-milyona-vimushenih-pereselentsiv.html>

<sup>8</sup> <http://www.pravda.com.ua/news/2015/02/23/7059456/>

employees are supported in meeting both their work commitments and family responsibilities<sup>9</sup>. In some cases it might be, for example, the creation of the child care services close to the workplaces. Family-friendly environments have proven to have possibility for building a “high performance teams” and these family-friendly provisions should be documented and communicated to the employees. The concept of work and family balance and its benefits should be positively received and understood by both managers and employees.<sup>10</sup>

**Recommendation:** The EBRD Gender Equality Strategy should have a roadmap for its clients on how to improve their HR/gender policies that would include “family-friendly environment”.

b) There is overt sexism in mass media, in advertising, and in public statements of public officials in Ukraine<sup>11</sup>. Recently, the EBRD’s client was spotted in using sexist advert that raised critics in public.

The petrol station OKKO in Kyiv (subsidiary of Galnaftogaz, the EBRD’s client) had a ‘HOT Saturday 26September2015’ action – women (and, as later became apparent, men) had to undress to get free fuel.



Photo from facebook page <https://www.facebook.com/okkoua>

This was highly not only offensive for women<sup>12</sup>, but also highly cynical in requiring "equal conditions for men", asking males to wear women's swimsuits – be they two-piece or one-piece. Photos<sup>13</sup> from the action clearly show OKKO's intention to perpetuate the stereotype of the ideally-shaped woman.

**Recommendation:** The EBRD should ensure its clients are aware of and following the Gender Strategy, as well as integrate the gender perspectives into their everyday work.

<sup>9</sup> <http://www.unicef.org/csr/235.htm>

<sup>10</sup> Best Practice Guide. Work and Family. Fair Work Ombudsman, Australian Government. [www.fairwork.gov.au/](http://www.fairwork.gov.au/)

<sup>11</sup> UKRAINE COUNTRY DEVELOPMENT COOPERATION STRATEGY 2012–2016.

[https://www.usaid.gov/sites/default/files/documents/1863/USAID\\_Ukraine\\_CDSCS\\_2012-2016.pdf](https://www.usaid.gov/sites/default/files/documents/1863/USAID_Ukraine_CDSCS_2012-2016.pdf)

<sup>12</sup> <http://life.pravda.com.ua/columns/2015/09/28/200803/>

<sup>13</sup> <http://on.fb.me/1MAj3bH>

### 3. Strategy enforcement and safeguards

The main weakness of the gender strategies in many IFIs that has been pointed out by stakeholders is the lack of enforcement and accountability with regards to separate investments. This draft Gender Strategy of the EBRD also lacks clear understanding how the evaluation and mitigation of the gender impacts of projects will be addressed.

One of the recommendations during the revision of the ESP in 2014 was that the EBRD should develop a Performance Requirement on Gender as soon as possible and strengthen its clause on gender in line with its shareholders' human rights obligations. Our experience shows that current safeguards are biased towards corporate governance, but lacking 'teeth' for safeguard communities and women impacted negatively by projects, because it is easier to agree with a client an Equal Opportunity policy than to resolve problems with communities caused by adverse project impacts.

**Recommendation:** The SGI evaluation has to include the assessment of the adequacy of safeguards and the need to include in the strategy a focus on preventing adverse gender impacts from projects on the communities.

**Recommendation:** To include in the future revision of the ESP a Performance Requirements on gender.

### 4. Rural women in Ukraine as a vulnerable group for the EBRD gender focus

As the EBRD is supporting the agricultural production boost in Ukraine, there should be special attention given to the situation of rural women in Ukraine. There are 7.5 million women in Ukraine's rural areas, comprising 52,3% of rural population. Women lead about half of the households in rural areas and most single-parent families in rural areas are families where the mother is the sole parent.

Rural women's needs are not fully recognized at national level. The state programme on development of rural areas for the period until 2015 did not take into account the needs of women as a separate target group.

Ukraine's rural women require special attention as they are at the forefront experiencing the impacts of social-economic changes<sup>14</sup> and already overburdened with gender stereotypes and huge work load<sup>15</sup>. Women in rural areas have much more duties than their counterparts in cities, for example employment (if any), household and family care duties, and subsistence agricultural and livestock care work. An additional factor exacerbating their already difficult situation is the lack of child care in rural areas, as in 2012 kindergartens in cities covered 83–100% and in rural areas only 32–83%<sup>16</sup> children at the age between 3–5 years.

Infrastructure is crucial for promoting economic opportunity, especially for the rural population. Transport influences all spheres of women's life: access to medical care and education, employment opportunities, and recreation/entertainment.

The State Statistics confirms that rural population suffered from all evidences of poverty in 2013 with 11,2% of households' members living under the official cost of living line (with 7,1% in cities). Living conditions are worsened by difficulties to establish proper sanitation (household water supply, bath facilities and flush toilets) and to maintain comfortable temperature inside the house<sup>17</sup>. Along with water supply, electricity supply is problematic, due to aging power transmission system, so these

---

<sup>14</sup> Advance of Factory Farming in Ukraine: Women and the Environment. Social and gender impacts of agro-industrial facilities on women in rural areas, 2015. [http://necu.org.ua/wp-content/uploads/Gender\\_and\\_farms\\_full\\_web.pdf](http://necu.org.ua/wp-content/uploads/Gender_and_farms_full_web.pdf)

<sup>15</sup> Complex Study of the Rural Women's Conditions (UKR), Secretariat of the Ombudsman <http://www.ombudsman.gov.ua/files/alena/Doslidzhennya%20Sil's'ki%20zhinky.pdf>

<sup>16</sup> same

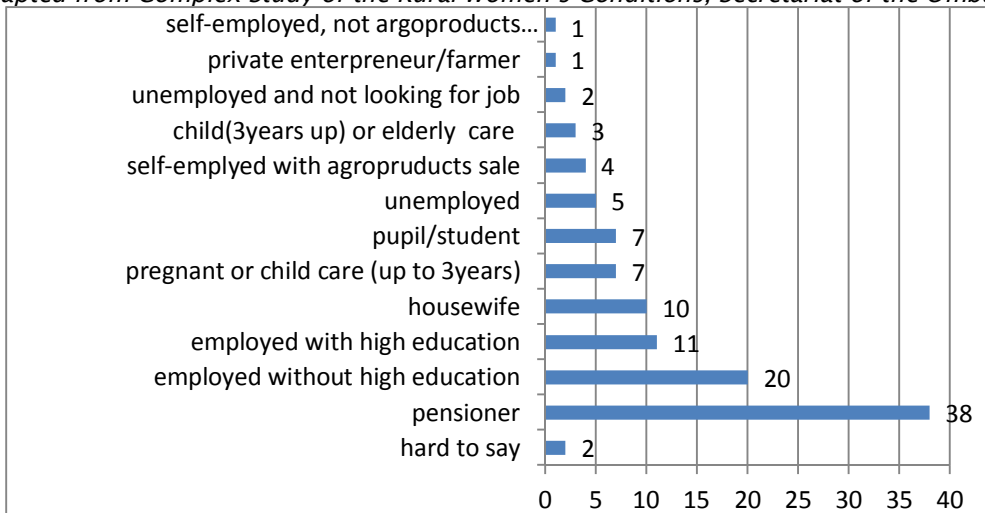
<sup>17</sup> Osaulenko O.G. Self-evaluation of the households in the access to certain goods and services, 2013, State Statistics Service: <http://ukrstat.gov.ua/>

are the most crucial problems in rural households. Rural women self-impose limitations on themselves that influence living conditions, as for example 41% need to spare on food so that they could buy clothing/shoes. Additionally 52% cannot make any savings, 45% cannot access transportation, 33% cannot obtain good education, and 29% cannot access good medical care if needed.

There are a variety of problems with employment in rural areas – women’s salaries are usually lower than these of men; the obtained education often cannot be utilised; formal employment with full social and health benefits is an exception, including for proper parental leave arrangements; prevalence of women’s professions and stereotypes again against business women, who are hardly seen or even negatively perceived entrepreneurs<sup>18</sup>.

Only 4% of rural women grow agricultural products for sale, as 45% of rural women point to absence of time, 34% to lack of willingness, 17% to lack of finances to buy or rent land, 7% to lack of access to distribution channels and 2% to lack of attractive credit lines<sup>19</sup>. Fig.1 shows tendencies with small commercial farmers in Ukraine – they are practically absent (1%) and, for example, are responsible for only 1% of animal husbandry production<sup>20</sup>.

Fig.1 Women’s occupation in rural areas, %  
Adapted from *Complex Study of the Rural Women’s Conditions, Secretariat of the Ombudsman in Ukraine, 2015*



Rural women in Ukraine need knowledge, skills and support for entrepreneurial initiatives like in the small-size enterprises for food production and sustainable rural tourism. Diversification of farming activities – switching to the new cultures, nuts production, rural tourism – would be beneficial for the rural areas<sup>21</sup>.

There is need for information campaigns that would help overcome the stereotypes and would provide successful examples. For example family-type kindergartens started organising in some villages, in order to address the lack of state supported child care centers, which illustrates an innovative service type of entrepreneurship.

There is a big problem of dying out of the “not perspective”<sup>22</sup> villages, because youth leaves them to seek education and jobs in cities. The Administrative reform which is now being discussed in the

<sup>18</sup> Complex Study of the Rural Women’s Conditions (UKR), Secretariat of the Ombudsman, 2015

<http://www.ombudsman.gov.ua/files/alena/Doslidzhennya%20Sil's'ki%20zhinky.pdf>

<sup>19</sup> same

<sup>20</sup> Development of the Animal Husbandry in Ukraine, 2014: [http://necu.org.ua/wp-content/uploads/Fermabook\\_UA\\_s.pdf](http://necu.org.ua/wp-content/uploads/Fermabook_UA_s.pdf)

<sup>21</sup> H.Skarga, All-Ukrainian Union of Rural Women, Round Table “Advance of Factory Farming in Ukraine: Women and the Environment”, Oct13,2015

<sup>22</sup> In 1960s in the Soviet Union there was invented a term of “not perspective” village. At that time individual households’ agro-activities were practically prohibited, and if the village was not hosting a big agricultural collective farm or enterprise, it was called “not perspective”. The villages were left without social and cultural institutions, no building of houses was allowed, and so that the population of the villages was not moving out – people were not given passports.

Parliament is supposed to solve this issue as more finances and rights would be given to the local communities. However, there are as well many fears that the reform will affect villages and small towns where medical care, schools and other public services are already at the edge of their capacity. Therefore special attention should be given to this reform and rural areas development should be treated as a social project with sustainable economic benefits<sup>23</sup>, so that village population would not be pressed to abandon their homes in search for better living conditions and services.

Some analysts<sup>24</sup> state the villages depopulation will be beneficial for the big agro-industrial corporations through enabling easier access to land. Studies<sup>25</sup> already point to the negative impact of large-scale agricultural and meat producing enterprises (also supported by the EBRD), which are putting a pressure on women and their environment and livelihoods.

### **Recommendations:**

Considering the situation of Ukraine's rural women described above, the EBRD should:

- prioritise Ukraine in its Strategy for Promotion of Gender Equality,
- ensure that specific gender objectives are included in the new Country Strategy that requires revision soon, and that progress is tracked on gender equality results.
  - when financing big agribusinesses, the EBRD should carry out gender impact assessment, in order to ensure that an account of the social conditions in rural areas where large-scale agro-industrial enterprises operate is taken and that negative gender impacts would be mitigated adequately.
  - work with its existing clients so that they would introduce Equal Opportunity policies, including provisions for paternal leave and establishing kindergartens at their enterprises;
  - ensure awareness among employees about their labour rights and that EBRD clients employ primarily residents of local communities without age and gender discrimination practices, providing decent pay and working conditions.
  - fostering access to education and skills and access to financial support for small and medium farms, as well as women-lead farms that are practically absent in the country at present. The support to SME farmers should be seen as a social project with enormous economic and other benefits. By doing so the Bank will maximize utilization of its additionality and ensure long-term sustainability.
  - at the policy dialogue level that Bank should pay attention to the Administrative reform that might have potential gender impacts on Ukraine's rural women.

Vladlena Martsynkevych  
CEE Bankwatch Network/National Ecological Centre of Ukraine  
vladlena@bankwatch.org

---

<sup>23</sup> H.Skarga, All-Ukrainian Union of Rural Women, Round Table “Advance of Factory Farming in Ukraine: Women and the Environment”, Oct13,2015

<sup>24</sup> <http://112.ua/mnenie/zerno-sest-lyudey-kak-eto-budet-v-ukraine-263596.html>

<sup>25</sup> Advance of Factory Farming in Ukraine: Women and the Environment, 2015: [http://necu.org.ua/wp-content/uploads/Gender\\_and\\_farms\\_full\\_web.pdf](http://necu.org.ua/wp-content/uploads/Gender_and_farms_full_web.pdf)