

Revision of EBRD's 2003 Environmental Policy: Stakeholder Consultation and Disclosure Plan (SCDP)

This Consultation and Disclosure Plan (SCDP) will: (i) describe EBRD requirements for stakeholder consultation and disclosure on a Bank policy; (ii) identify key stakeholder groups for the revision of the Environmental Policy; (iii) provide a strategy and timetable for sharing information and consulting with these groups during appropriate phases of the review and revision; and (iv) detail reporting/documentation of consultation and disclosure activities.

Key Principles

The goal of consultation on the Bank's policies is to ensure that adequate and timely information is provided to interested people and to those potentially affected by the Bank's operations and policies that guide operations, and that these groups are given sufficient opportunity to voice their opinions and concerns. Important considerations include:

- communication in English and Russian languages and readily understandable formats;
- easy accessibility to both written information and to the consultation process by relevant stakeholders via dedicated e-mail, the Bank's website, Resident Offices, ENVAC members, and mailing list;
- care in assuring that groups being consulted are representative of the group of topics covered within the policy; and
- defining a clear mechanism to disclose results of consultation.

It is also critical that the internal stakeholders of the Bank's policies - the staff and management that must implement them - have the opportunity to comment, voice concerns, make suggestions for improvement.

Policy consultation requirements

EBRD is required, under the Public Information Policy (2006), to consult with stakeholders on preparation and results of policy documents, such as the Environmental Policy.

A draft policy document must be posted on the EBRD web site for a minimum of 45 calendar days. A summary of the comments that are received and staff responses will be provided to the Board of Directors and will be posted on the web site following the Board discussion.

Given the interest in the Environmental Policy, the Bank proposes to add an additional stage of consultation for 45 days on the basis of an Issues Paper, summarising key areas of change under consideration. Following the consultation on the Issues Paper, the Bank will prepare a draft revised Policy, which will also be posted for public consultation. In addition to inviting comments on the draft revised Policy in writing, the Bank also plans to hold a series of workshops during the public consultation period.

Overview of the consultation process

A dedicated web site will be developed in order to inform stakeholders about the process and make available related documents throughout the Environmental Policy revision process. Stakeholders will be kept abreast about meetings and document release by signing up at environment@ebrd.com.

	Action	Estimated time period
(1)	Consultation on Issues Paper	
	Prior to preparing the first draft of the revised policy, the Bank will prepare an “issues paper”, outlining key issues that need to be taken into account in the revision process. This paper will be posted in English and Russian languages on the EBRD website for a 45 calendar day comment period.	May/June
(2)	First draft of revised Policy	
	Bank staff will prepare the first draft of the new Policy, taking into account comments received on the Issues Paper.	June/July
(3)	Consultation on draft revised Policy	
	The draft policy document will be posted in English and Russian languages on the EBRD website for public comment for a minimum of 45 calendar days. The published document will indicate the closure date for comments. In addition to soliciting written comments, the Bank will conduct [6] public workshops to discuss the issues at stake, the alternatives, and to solicit comments. These workshops will be held in London, central Asia, central Europe, the Caucasus and Moscow. The workshop reports will be posted on the EBRD website in both English and Russian. For some stakeholder groups, alternative consultation processes may be more effective – see stakeholder section below for details.	August - October Public workshops: Second half of September/ October
(4)	Second draft of revised Policy and response to stakeholder comments	
	Based on the comments received during the consultation period, a revised draft of the new Policy will be prepared. The Bank will also prepare a summary of comments received and the Bank’s response. Both documents will be submitted for consideration by the Bank’s Senior Management	October/ November
(5)	Board consideration	
	The final draft new Policy response will be submitted to the Board of Directors for approval. The Board will also receive the summary of stakeholder comments and Bank responses. Following Board approval, the Bank will post on the EBRD website: English and Russian versions of the approved Policy, and a summary of the stakeholder comments and Bank response in English.	December
(6)	Translation of new Policy into other language of EBRD countries of operation	From January 2008

Details of proposed interaction with identified Stakeholder Groups

- Board of Directors, shareholders, donors: Board workshops will be held on the Issues Paper and draft new Policy.
- Bank staff: An inter-departmental working group will be established to provide input from relevant areas of the Bank during the policy revision. The working group will include representatives from the Environment and Sustainability Department, Banking vice Presidency, the Office of the General Counsel, the

Office of the Chief Economist, Communications Department, Evaluation Department, the Office of the Secretary General, and Office of the Chief Compliance Officer.

The Working Group will also advise the Bank on an implementation and training programme for the new Policy.

- Environmental Advisory Council (ENVAC): The revision of the Policy has been on the ENVAC agenda for the past two meetings. It will be a primary focus of the spring and autumn meetings in 2007 as well. For specific areas, individual ENVAC members may be asked to work more closely with the Bank. The draft revised Policy will be reviewed by ENVAC prior to being circulated for comment by external stakeholders.
- Other IFIs and commercial banks (World Bank, IFC, ADB, IADB, AfDB, EIB, Export Credit Agencies, Equator Banks): The Issues Paper will be circulated to contact points via e-mail. Presentations will be made at meetings of the Environmental Working Group of the MDBs and of DFI Social Experts and, if requested, meetings of the OECD Working Party on Export Credits and of the Equator Banks.
- Clients and Business organisations: Comments on proposed changes to the EP from clients and Business organisations will be requested via surveys.
- International and local NGOs (environmental, human rights, health, gender, and other social issues): A mailing list of groups particularly interested in Bank policy and environmental/social issues in the Bank's region of operation will be sent the issues paper in English and Russian language. The mailing list will also be used to notify groups of the public workshops. Any NGO can be asked to be added to the mailing list by contacting environment@ebrd.com. The Bank is currently investigating possibilities for financial support to assist local NGOs with the cost of participating in a consultation workshop in the region.
- Labour issues: The Bank has, in close collaboration with the ILO, established a working group including ILO experts, employers representatives and Trade Union representatives, and will communicate via email with this group. In addition, a special consultation meeting on the draft new Policy can be arranged with this group if requested.
- Other International Organisations: The Bank will communicate via e-mail with appropriate organisations, such as (e.g., secretariats of Aarhus and Espoo Conventions, UNEP, WHO, IMO, EU, IUCN). Bank representatives will meet in Geneva and Brussels with a number of international organisations.
- Other Interested Parties: The Bank will issue an e-mail announcement and Press Release to notify interested parties that consultation on the existing Environmental Policy and, in due course, about the availability of the draft revised EP and describing the process of consultation.

Comments on the Review Process

Questions and comments on the policy revision process and requirements should be brought to the attention of the Bank by contacting environment@ebrd.com.

Update

This SCDP will be updated over time. Updates will include, in particular, information on the timing and arrangement of public meetings.