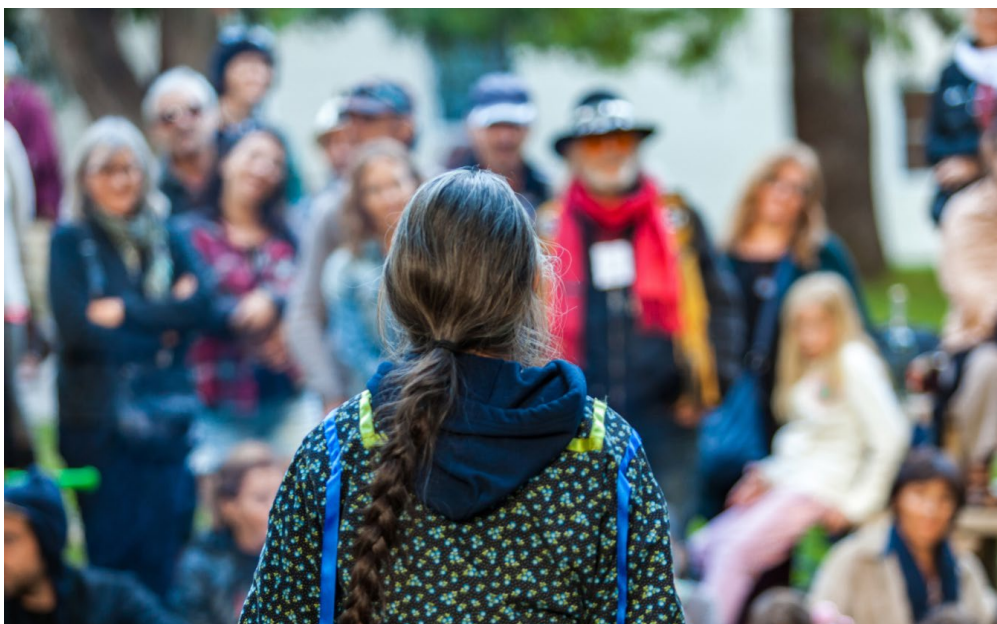


The role of stakeholder engagement in the EBRD's impact monitoring and reporting

Why stakeholder engagement should matter for the EBRD



A woman speaking at a public consultation event. Source: Adobe Stock

The effective participation of citizens and civil society in the design, implementation, monitoring, and evaluation of EBRD's operations is essential for achieving sustainable development outcomes. The meaningful involvement of rights holders enhances accountability, improves project results, fosters more responsive and inclusive governance, and reliably indicates development impacts. Apart from these benefits, community-level engagement also helps strengthen citizen-state relations.

Yet, despite the EBRD's strong policy commitments, its funded projects offer no evidence of meaningful stakeholder engagement. Reports from civil society organisations and the EBRD's Independent Project Accountability Mechanism (IPAM) highlight persistent gaps in public participation. And while the EBRD's engagement is typically more pronounced at the country level, the actual influence

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of consultations on decision-making at the project level remains unclear. At the institutional level, the EBRD has developed advanced stakeholder engagement frameworks and structures, yet effectiveness is difficult to assess due to limited reporting on outcomes.

The lack of systematic monitoring and reporting, particularly at the project level, raises concerns about the effectiveness of the EBRD's overall stakeholder engagement. Without clear data on how feedback from rights holders is actively sought out and incorporated into EBRD-funded projects and safeguards, as well as country and sector strategies, stakeholder engagement risks being viewed as a procedural formality rather than as a tool for improving development outcomes or as an indicator of democratic transition.

The EBRD has acknowledged challenges arising from shrinking civic space, which directly impacts its ability to fulfil its sustainable development and democracy mandates. Some improvements to safeguards have been made to ensure meaningful stakeholder engagement across the EBRD's operations.

However, further efforts are needed to enhance monitoring and public reporting on stakeholder engagement. This would not only enable the EBRD to track and learn from the effectiveness of its engagement, but also provide insights into power imbalances, exclusionary practices, and potential human rights risks, offering early warnings of deteriorating conditions at the country level. By elevating public participation as an institutional priority and responding more systematically to civic space dynamics at the project and country levels, the EBRD can improve development effectiveness, protect rights, and reinforce its commitment to democratic transition.

This publication examines the EBRD's policies and practices related to stakeholder engagement, monitoring, and reporting at the project, country, and institutional levels, with the aim of identifying areas for improvement. It concentrates on four key elements of stakeholder engagement: information disclosure, public participation, grievance redress mechanisms, and support for enabling conditions and capacity building. The primary focus throughout is on engagement with affected communities and civil society organisations.

EBRD's stakeholder engagement monitoring and reporting: Policies and practices

The EBRD has introduced revised safeguards, including an updated Environmental and Social Policy and Access to Information Policy, which take effect in 2025. These updated policies reinforce the EBRD's commitments and introduce enhanced requirements for clients to ensure meaningful stakeholder engagement.

At the **project level**, the EBRD commits to proactively disclosing environmental and social information on certain projects, including stakeholder engagement plans. It also undertakes to report annually on project-related environmental and social risks and impacts, and to engage with stakeholders to assess project risks,

inform investment decisions, ensure the effectiveness of mitigation measures, and verify client-provided information.

In cases of heightened community risk, the EBRD may conduct its own consultations and is expected to summarise key stakeholder engagement activities in project summary documents. Additionally, it monitors client compliance with stakeholder engagement requirements throughout the project life cycle, including through site visits and third-party audits where necessary. Starting in 2025, the EBRD is set to introduce a process for the early identification and resolution of stakeholder concerns, the details of which remain unclear.

Clients are required to identify all relevant stakeholders and promptly disclose project-related risks, impacts, and mitigation measures. Stakeholder engagement must be inclusive, gender-responsive, and free from coercion or manipulation. Clients must conduct early and ongoing consultations that are culturally appropriate, and integrate stakeholder engagement into risk assessments and impact mitigation strategies. They are also expected to establish and publicise an effective grievance mechanism and to continuously monitor and report on stakeholder engagement activities. Additionally, clients are required to publish and update stakeholder engagement plans, report on public consultation outcomes, document grievances and responses, and submit regular reports to the EBRD on project performance, including stakeholder engagement.

The IPAM, serving as the EBRD's accountability mechanism, is responsible for addressing stakeholder concerns related to environmental, social, and disclosure issues, including those related to stakeholder engagement. It maintains a public registry of complaints, discloses compliance review outcomes, and publishes monitoring reports on the implementation of management action plans. The IPAM also publishes management responses, including information on stakeholder engagement where relevant.

At the **country level**, the EBRD places strong emphasis on stakeholder engagement in the development of its country strategies. This involves early-stage consultations with civil society and other stakeholders, disclosure of draft strategies for public input, and the development of stakeholder engagement plans to guide stakeholder participation. Each country strategy incorporates a section summarising the key messages received from civil society. The EBRD also publishes an 'invitation to comment' report, which details the consultation process and the EBRD's responses. Additionally, the EBRD Board of Directors and President conduct visits to the EBRD's countries of operation, meeting with civil society organisations to gather perspectives on policies and investments.

At the **institutional level**, the EBRD commits to transparency in the disclosure of policy and strategies, and to ensure stakeholder engagement is considered in its review. It is obliged to formulate and disclose stakeholder engagement plans as part of its institutional policy updates, which are aimed at guiding stakeholder engagement. To document this process, the EBRD publishes a report on the invitation to comment, which summarises the stakeholder consultation process, comments received, and the EBRD's responses.

The EBRD's Sustainability Report, published annually, highlights the institution's engagement efforts, including the number of consultations and partnerships, and presents case studies on public consultations and capacity-building initiatives. Each year, the EBRD publishes a report on the implementation of its Access to Information Policy, which provides details on stakeholder engagement activities. This report also offers an overview of institutional and project information disclosure, information requests, the timing of policy- and strategy-related public consultations, and the EBRD's engagement with civil society and partnership initiatives.

The IPAM's annual reports outline its outreach activities, including engagement with civil society organisations, as well as analyses of its case portfolio, featuring reviews of stakeholder engagement practices. Additionally, the Office of the Chief Compliance Officer (OCCO) – responsible for overseeing integrity standards and addressing retaliation, recognised as a prohibited practice under its revised Integrity Risk Policy – may engage with civil society on relevant initiatives. The OCCO also reports annually on the number of reprisal-related complaints received.

The EBRD's Independent Evaluation Department conducts independent assessments of EBRD operations and may engage with stakeholders to verify information and ensure diverse perspectives are considered. Selected evaluation reports are published on the EBRD website.

The EBRD recently adopted its Approach to Civil Society Engagement (2024–2029), which sets key objectives for strengthening collaboration with civil society. To support this effort, the EBRD has established the Civil Society Organisation Steering Committee as an additional forum for dialogue and to enhance the EBRD's engagement with civil society stakeholders. Through its Civil Society Capacity Enhancement Framework, the EBRD is committed to supporting and empowering civil society through grants, training, advisory services, and mentoring.

The EBRD also holds the EBRD Civil Society Forum as part of its Annual Meeting and Business Forum, where members of the Board of Directors and senior management engage with civil society organisations on key operational issues. The outcomes of the forum are shared in the EBRD Civil Society Newsletter, which also provides updates on interactions between the Board and civil society organisations, country visits, and partnership initiatives.

Lastly, the Environmental and Social Advisory Council (ESAC), composed of representatives from non-governmental organisations, the private sector, and academic and research institutions, advises the EBRD on environmental and social issues.

Table 1. EBRD stakeholder engagement framework by level.

Type of activity	Project level	Country level	Institutional level
Information disclosure	<p>Project Summary Documents (including updates)</p> <p>Disclosure of environmental and social project-related information for category A projects (full disclosure, including stakeholder engagement plans), selected category B projects (limited disclosure, but including stakeholder engagement plans), and financial intermediary category projects (excluding stakeholder engagement plans)</p>	<p>Country strategies</p> <p>Draft country strategies for public commenting</p>	<p>Environmental and Social Policy (including drafts)</p> <p>Access to Information Policy (including drafts)</p> <p>Project Accountability Policy (including drafts)</p> <p>Sectoral strategies (including drafts)</p> <p>Approach to Civil Society Engagement</p>
Monitoring and evaluation, public reporting	<p>Access to Information Policy Implementation Report covering the EBRD's project-level disclosure only</p>	<p>Access to Information Policy Implementation Report</p>	<p>Access to Information Policy Implementation Report</p>
Engagement activities	<p>Stakeholder engagement plans for selected projects at the appraisal stage</p> <p>Stakeholder engagement to inform project appraisal and monitoring</p> <p>Public consultations by the EBRD in cases of heightened community risk</p>	<p>Stakeholder engagement plans for country strategy reviews</p> <p>Early-stage engagement with civil society organisations</p> <p>Publication consultations on draft country strategies</p>	<p>Stakeholder engagement plans for good governance policies and sector strategy reviews</p> <p>Public consultation events under the EBRD's policy and sector-strategy reviews</p> <p>IPAM outreach activities</p>

	<p>Public consultations conducted by the client during impact assessment and mitigation</p> <p>Ongoing stakeholder engagement by the client throughout the project life cycle</p> <p>Optional participatory monitoring arranged by the client</p>	<p>Meetings between the EBRD Board of Directors, the EBRD President, and civil society organisations as part of country visits</p> <p>Engagement by the EBRD Board of Directors and President with civil society organisations at the EBRD AGM</p>	<p>Independent Evaluation Department outreach activities and engagement with civil society to inform assessments</p> <p>Civil Society Organisation Steering Committee</p> <p>Environmental and Social Advisory Council</p> <p>Civil Society Forum at the EBRD AGM</p> <p>Survey of civil society organisations to collect feedback</p>
Monitoring and evaluation, public reporting	—	<p>Section on country-strategy issues raised by civil society organisations</p> <p>Report on the invitation to comment, summarising public consultations under EBRD country strategy reviews, including comments and responses</p> <p>News on the EBRD Board of Directors and the President's meetings with civil society organisations during country visits</p>	<p>Sustainability Report</p> <p>IPAM Annual Report</p> <p>Independent Evaluation Department Annual Evaluation Review</p> <p>Access to Information Policy Implementation Report</p> <p>Integrity and Anti-Corruption Report</p> <p>Civil Society Newsletter</p> <p>Report on the invitation to comment, summarising public consultations under</p>

		Limited reports by the Independent Evaluation Department on the implementation of country strategies	EBRD policy and strategy reviews, including comments and responses
Grievance redress mechanism	For selected projects, stakeholder engagement plans disclosed by the EBRD typically contain limited information on grievance redress mechanisms	OCCO	IPAM OCCO Complaints process – recently introduced but lacking details
Monitoring and evaluation, public reporting	—	Ineligible entities list, OCCO Integrity and Anti-Corruption Report	IPAM Registry IPAM Annual Report Ineligible entities list, OCCO Integrity and Anti-Corruption Report Sustainability Report Global Reporting Initiative disclosure report No information on the operation of the recently introduced ‘complaints process’
Support for enabling conditions and capacity development	—	The EBRD Capacity Enhancement Framework includes commitment to providing support to local civil society organisations through	Commitments and requirements under the Environmental and Social Policy (2024) The EBRD’s approach to civil society engagement (2024–

		training, workshops, mentoring, and grants.	2029): commitment to supporting civil society and advocating for a safe civic space Civil Society Organisation Steering Committee
Monitoring and evaluation, public reporting	—	—	Limited information presented in the Sustainability Report and Civil Society Newsletter.

Gaps in the EBRD's stakeholder engagement monitoring and reporting

At the **project level**, EBRD policy requires clients to ensure information disclosure – including stakeholder engagement plans – as well as meaningful engagement, regular monitoring, and reporting on implementation to both stakeholders and the EBRD. However, in practice, it is often difficult to verify whether these requirements are being fulfilled by clients. Based on our experience monitoring specific cases, clients do not always disclose annual reports on project performance and stakeholder engagement, including on the operations of grievance redress mechanisms, nor do they consistently publish updated stakeholder engagement plans. In addition, the EBRD does not update project summary documents to reflect revised stakeholder engagement plans or the clients' annual reports. In some instances, project summary documents are publicly disclosed only after project approval, or are absent altogether – particularly in the case of framework programmes or project extensions.

Apart from civil society reports, the only other available source of information on stakeholder engagement practices at the project level is the IPAM complaint registry and its annual reports. A lack of meaningful stakeholder engagement remains one of the most common grievances in cases submitted to the IPAM. However, due to the IPAM's limited capacity, the barriers faced by potential complainants, and the lack of any proactive outreach policy, the data captured in the registry cannot be considered comprehensive, giving cause for concern.

Although EBRD policies commit to monitoring project compliance through its policies, including on stakeholder engagement, its public reporting on the engagement practices of its clients remains extremely limited. Since the EBRD does not disclose project monitoring reports, it is unclear what information is collected from clients, how it is verified, and whether any aggregated data on stakeholder engagement at

the project level exists to support evaluation and institutional learning. Under the revised Access to Information Policy, the EBRD commits to disclosing environmental and social action plan implementation reports (post-completion) for category A projects, as well as environmental and social management system implementation reports for financial intermediary category projects. However, this disclosure remains limited in both scope and timeliness, making it difficult to independently verify, track progress, or learn from stakeholder engagement practices.

The EBRD discloses project-related information, including stakeholder engagement plans, for only a limited number of projects and typically only at the project appraisal stage. These plans often take the form of generic frameworks that lack substantive detail on engagement activities with affected communities, individuals, and vulnerable groups.

They usually omit information on the outcomes of consultations, the functioning of grievance redress mechanisms, measures to mitigate retaliation risks, stakeholder reporting practices, and the involvement of communities in project monitoring. While the environmental and social impact assessments disclosed for a limited number of category A projects may contain some references to early-stage stakeholder engagement by clients, they are frequently confined to lists of events and participants, with little to no information on consultation outcomes or how input was incorporated into project impact assessment and mitigation planning. They also tend to exclude data on the early functioning of grievance redress mechanisms.¹ Collectively, these shortcomings raise serious questions about the quality and transparency of stakeholder engagement by clients, underscoring the need for more robust public reporting and disclosure.

Under its Environmental and Social Policy, the EBRD commits to conducting site visits or commissioning third-party audits to verify that stakeholder engagement activities are effectively implemented. In cases involving heightened community risk, the EBRD may also conduct its own public consultations. However, there are no specific requirements for the EBRD to publicly report on these activities, apart from occasional updates to project summary documents, which are often limited in detail, irregularly updated, and omit substantive information on the EBRD's own engagement activities and their impacts on due diligence throughout the project life cycle.

Before approving a project, the EBRD Board of Directors is required to review project documentation, including a summary of stakeholder engagement activities, and to consider stakeholder comments and concerns when assessing overall project benefits and risks. While the Environmental and Social Policy highlights the Board of Director's role in considering stakeholder engagement during project approval, it does not establish specific requirements for reporting to the Board of Directors regarding these engagement activities. Though the Board of Directors may engage with civil society organisations and

¹ CEE Bankwatch Network, [Key trends and shortcomings in community engagement on high-risk EBRD projects](#), CEE Bankwatch Network, 24 May 2024.

community representatives to gain alternative perspectives or verify information provided by management, these engagements typically lack transparency. Beyond meetings with civil society organisations held during the EBRD's Annual Meeting and Business Forum, little information is available on the Board of Directors' project-specific stakeholder engagement or how these inputs are reflected in final decisions.

Moreover, project documents often lack data on how the EBRD and its clients intend to support an enabling environment for stakeholder engagement or invest in capacity-building efforts. A Bankwatch study of category A project documentation revealed that fewer than 20 per cent of projects included any reference to developing anti-retaliation policies, with only a limited number of high-risk projects containing explicit commitments or indicative budgets dedicated to community engagement.² In summary, publicly available information on the EBRD's efforts to strengthen the capacity of communities and civil society organisations towards ensuring meaningful engagement at the project level remains extremely limited.

At the **country level**, the EBRD discloses information on the stakeholder engagement opportunities as part of the country strategy revision and commits to proactively seeking initial feedback. However, there is no publicly available information on the stakeholder analysis conducted. While country strategies are made available for public comment – primarily aimed at civil society organisations – the extent of engagement with communities, grassroots movements, and marginalised groups remains unclear. Invitation-to-comment reports typically summarise public consultations, but it is not clear how public input ultimately influences the final country strategies. And although country strategies do include messages from civil society organisations, the EBRD does not report on how stakeholder concerns are integrated into the implementation of the strategies. Additionally, country strategy consultations are not systematically documented or reported, making it hard to track the evolution of stakeholder concerns over time.

The EBRD Board of Directors and EBRD President conduct regular country visits, which typically include meetings with civil society representatives. However, there are no specific requirements to report on the results of these meetings. Information about these meetings published on the EBRD website is generally scant, with very little detail on the issues discussed or any agreements reached. Additionally, civil society representatives are typically given minimal advance notice of these meetings, which can limit meaningful engagement with a sufficiently diverse range of stakeholders and rights holders, particularly local communities and marginalised groups. Outside of the country strategy revision process, there is also little publicly available information on opportunities for civil society to engage with the EBRD's country offices.

The EBRD's accountability mechanisms, such as the IPAM and OCCO, primarily focus on addressing complaints related to EBRD-financed projects, with the OCCO also tasked with investigating prohibited practices involving EBRD assets and staff. However, there appears to be a gap when it comes to addressing country-level concerns, such as those that may arise from limited stakeholder engagement during country strategy revisions or from the impacts of policy dialogue.

² Ibid., 3.

Despite the EBRD affirming its commitment to supporting an enabling environment for civil society and promoting a safe civic space, there is no systematic information on the specific actions undertaken at the country level. Detailed information on activities intended to uphold this commitment, such as those related to policy dialogue, human resources, and budget allocations, is similarly lacking. This also applies to information on capacity-building activities undertaken at the country level. For instance, the Civil Society Newsletter and EBRD annual reports typically feature only a few case studies without any systematic reporting.

While EBRD country strategies include reflections on civic space within the political context assessment of each country, they typically lack any analysis of the EBRD's own contribution to strengthening public participation in environmental and social decision-making. Similarly, although the EBRD's transition impact indicators – which include terms like 'well-governed', 'green', and 'inclusive' – highlight the potential for civic engagement outcomes, country-level assessments and strategy implementation evaluations rarely consider impacts on civic space or citizen engagement over time. In fact, a recent report by the Independent Evaluation Department on the EBRD's policy dialogue performance raised concerns about weak country level reporting, pointing to persistent challenges in demonstrating long-term sustainable development impacts.³

At the **institutional level**, the EBRD has made high-level commitments and established mechanisms to support stakeholder engagement. However, further efforts are needed to ensure this engagement is genuinely meaningful and inclusive. The EBRD systematically arranges public consultations to inform reviews of its institutional good governance policies and sectoral strategies. Unfortunately, this engagement primarily focuses on civil society organisations, but often limits or excludes affected communities, marginalised groups and grassroots movements. Additionally, information on public consultations with vulnerable groups aimed at informing policy and strategy reviews remains scarce. A notable exception is the joint engagement by the EBRD and the World Bank with LGBTIQ+ groups in Central Asia – a promising practice that should be more widely integrated into the EBRD's operations.

While institutional reports, such as the Sustainability Report, the GRI Report - Sustainability Disclosures, and the Access to Information Policy Implementation Report – provide general overviews of the EBRD's engagement efforts, they typically lack detailed insights on stakeholder engagement dynamics over time and across regions, including effectiveness, challenges, gaps, and actual impacts on EBRD policies and operations.

While the EBRD has established a range of protocols to facilitate institutional-level engagement with civil society, in particular – including the Civil Society Organisations Steering Committee, the Environmental and Social Advisory Council, the Civil Society Forum during the EBRD Annual Meeting, and the EBRD's civil

³ EBRD Independent Evaluation Department, [“Moving wheels of change”: An evaluation of the EBRD's policy dialogue performance and results 2017-2023](#), European Bank for Reconstruction and Development, December 2024.

society survey tool – their actual impact on shaping institutional policies and practices remains unclear, with limited reporting on outcomes.

Although the EBRD has established a dedicated Civil Society Unit and adopted strategic frameworks on civil society engagement and capacity enhancement, there are no publicly available action plans or implementation reports to track progress. The limited information disclosed about specific initiatives impedes a clear understanding of the scope and effectiveness of these efforts. Indeed, greater transparency is needed regarding the human and financial resources allocated to stakeholder engagement efforts, to ensure they correlate with the EBRD's operational footprint. For example, the EBRD's expansion into sub-Saharan Africa and its recent capital increase must be reflected in an amplification of resources to support meaningful stakeholder engagement and strengthen accountability mechanisms across a more diverse infrastructure.

The EBRD's accountability mechanisms – which include the IPAM, the OCCO, and the Information Appeals Panel – emphasise operational transparency and accountability. However, they lack clearly defined reporting requirements related specifically to stakeholder engagement. While the IPAM's annual reports provide an overview of its outreach activities, they offer limited information on institutional learning, particularly regarding stakeholder engagement at the project level. The OCCO publishes the number of retaliation-related complaints submitted by civil society, yet provides minimal information on follow-up actions, and does not report on broader stakeholder engagement efforts, as reflected in the Integrity and Anti-Corruption Report.

Similarly, the Access to Information Policy Implementation Report primarily focuses on the EBRD's own disclosure practices, without providing an overview of client-led disclosure. And although it includes data on various information requests and institutional-level stakeholder engagement activities, an analysis of how these inputs influence the EBRD's operations and policies is lacking.

The Independent Evaluation Department conducts independent assessments of the EBRD's operations to collect evidence on performance and identify areas of success and improvement. The EBRD's Evaluation Policy mandates transparency and public disclosure in line with the Access to Information Policy, and promotes engagement with stakeholders, including civil society, to ensure evaluations reflect diverse perspectives. However, the policy does not explicitly outline specific requirements for civil society engagement or reporting on such activities. In fact, some evaluation reports are confined to internal use only.

Despite the EBRD's stated commitment to upholding the right to participation, investing in sustainable development, and supporting democratic governance, civil society engagement is still largely viewed as a risk management tool instead of a core component of inclusive development. This reality is not effectively reflected in the EBRD's Transition Impact indicators or Corporate Scorecard, despite the EBRD's mandate. While the EBRD's expected transition impact scoring system provides insights into project outcomes, it does not fully capture how effectively the EBRD ensures inclusive decision-making across its operations.

International best practices in stakeholder engagement monitoring and reporting

The Global Reporting Initiative⁴ issues widely recognised standards for sustainability reporting, which are applied by the EBRD and many other multilateral development banks. According to the official Global Reporting Initiative Standards, organisations must document their most significant positive and negative impacts on the economy, environment, and people – including human rights impacts – and to explain how these impacts are managed. This includes reporting on the processes used to track the effectiveness of actions taken, the lessons learned, and how these lessons are integrated into operational policies and procedures. Importantly, the standards emphasise the need to account for how stakeholder engagement has influenced these actions and informed the evaluation of their effectiveness.

In 2019, the Council of Europe Development Bank conducted a comprehensive materiality assessment in line with the Global Reporting Initiative Standards, incorporating both internal and external stakeholder surveys. This process identified 16 material topics to be prioritised for evaluation and reporting, including community and stakeholder engagement. However, the assessment did not result in specific reporting indicators for this topic.⁵

Recent initiatives by multilateral development banks signal a shift in institutional priorities – from focusing primarily on financing volumes to measuring the development impact of investments and the definition of meaningful performance metrics.⁶ Several multilateral development banks, including the African Development Bank (AfDB), the Asian Development Bank (ADB), and the World Bank Group, have adopted systems for project-level impact reporting that incorporate both *ex ante* and *ex post* assessments, often disaggregated by gender.⁷ Both the AfDB and the ADB set output and outcome targets aligned with the United Nations' Sustainable Development Goals and publish progress update reports. The Asian Infrastructure Investment Bank, through its Corporate Scorecard, reports on the number and proportion of projects with no severe or unresolved issues affecting performance and results.⁸

Under its revised Corporate Results Framework, the ADB annually monitors, assesses, and reports on citizen engagement mechanisms adopted across its operations. These mechanisms include consultations, grievance redress systems, the collection and reporting of beneficiary input, capacity-building engagement initiatives, and collaboration with citizens and communities in the planning and implementation of policies, programmes, and projects. They also cover citizen and community involvement in monitoring, evaluation,

⁴ Global Reporting Initiative, [About GRI](#), *Global Reporting Initiative*, accessed 25 April 2025.

⁵ Council of Europe Development Bank, [About us | Sustainability](#), *Council of Europe Development Bank*, accessed 25 April 2025.

⁶ United Nations Economic and Social Council, [Trends and progress in international development cooperation: Report of the Secretary-General](#), *United Nations Economic and Social Council*, 3 January 2025.

⁷ Nancy Lee, Samuel Matthews, [Multilateral Development Bank Reform Tracker](#), *Center for Global Development*, 18 October 2024.

⁸ Nancy Lee, Samuel Matthews, [How Multilateral Development Banks Measure Their Institutional Success](#), *Center for Global Development*, 1 February 2024.

and oversight, as well as efforts to empower communities with resources and decision-making authority. This reporting serves as a proxy indicator for Sustainable Development Goal 16, which aims to promote peaceful and inclusive societies, ensure access to justice for all, and build effective, accountable, and inclusive institutions at all levels.⁹

In 2020, the ADB introduced a new indicator on civil society engagement and now reports annually on the percentage of completed projects that achieved meaningful engagement, relative to the total number of projects that had planned such engagement at the outset. In addition, under its revised Operational Approach to Enhanced Civil Society Engagement (2025–2030), the ADB commits to setting, tracking, and reporting on targets for meaningful engagement across its projects.¹⁰

The World Bank Group recently revamped its Corporate Scorecard to better align with its mission and the Sustainable Development Goals, introducing 22 provisional indicators across 12 thematic areas, with a focus on project-level outcomes. However, civil society organisations have criticised the new approach for its lack of attention to adverse impacts, an absence of indicators on the effectiveness of mitigation measures, and its failure to assess the quality of community consultations.¹¹

In response, the World Bank has proposed a new composite indicator – the quality of civic or citizen engagement – which is set to be included in the Organizational Effectiveness and Efficiency Dashboard, part of its revised Corporate Scorecard. The indicator is designed to assess the World Bank’s performance in civic and citizen engagement over time, bridging project and country levels, identifying good practices, and highlighting areas for improvement. Additionally, the World Bank is developing a new monitoring system for annual civic engagement reviews at the country portfolio level, alongside tools for assessing client frameworks for meaningful engagement.¹²

⁹ Asian Development Bank, [Development Effectiveness Review \(DEfR\)](#), *Asian Development Bank*, accessed 25 April 2025.

¹⁰ Asian Development Bank, [ADB Civil Society Approach: An Operational Approach to Enhanced Engagement, 2025–2030](#), *Asian Development Bank*, October 2024.

¹¹ Jack Tierney, [Is the World Bank’s Provisional Corporate Scorecard an Improvement from the Old Format?](#), *Bank Information Center*, 31 January 2024.

¹² World Bank Group, [Civic and Citizen Engagement | Strategy | Renewal of the World Bank’s strategy for Civic and Citizen Engagement \(CCE\)](#), *World Bank Group*, accessed 25 April 2025.

Recommendations

Project level

- Develop measurable indicators for meaningful civil society engagement and integrate them into the monitoring frameworks used by the EBRD and its clients.
- Standardise monitoring tools by introducing templates that require clients to report on engagement outcomes, including outreach aimed at vulnerable groups, the effectiveness of grievance redress mechanisms, and anti-retaliation measures.
- Mandate that clients integrate civic space risk assessments into project design and decision-making processes to mitigate threats to human rights defenders and local communities.
- Track and document stakeholder input throughout the project life cycle, including how it informs project design, implementation by the client, and the EBRD's due diligence.
- Ensure timely public disclosure of revised stakeholder engagement plans, client-submitted annual performance and stakeholder engagement reports, including data on grievance redress mechanism operations via updated project summary documents, particularly for high-risk projects.
- Systematically report on EBRD oversight by publicly disclosing records of site visits, third-party audits, and follow-up consultations via updated project summary documents, again, particularly for high-risk projects.
- Publish aggregated data on project-level stakeholder engagement trends – by the clients and the EBRD – to support institutional learning and continuous improvement.
- Require budget provisions within project financing to support stakeholder engagement – by the clients and the EBRD – especially for civil society outreach and capacity development.

Country level

- Institutionalise participatory processes by developing, monitoring and reporting on country-level stakeholder engagement action plans and assessments.
- Establish and strengthen multi-stakeholder platforms to engage civil society organisations and local communities in the development and implementation of country strategies.
- Improve transparency by publishing disaggregated stakeholder analysis and consultation summaries, with clear explanations of how this input is incorporated into final country strategies.

- Ensure ongoing engagement with civil society and affected communities beyond the country strategy consultation period, and publicly report on the results.
- Track initiatives to promote safe civic space by reporting actions taken to support an enabling environment, including specific policy dialogue efforts and resource allocations.
- Introduce a dedicated pathway for addressing grievances related to country-level stakeholder engagement and strategy development.
- Assess and report regularly on how civic space restrictions in particular countries may impact the ability of communities and civil society to engage in EBRD-funded projects and monitor overall performance.

Institutional level

- Integrate citizen and civic engagement indicators into the EBRD's Transition Impact framework and Corporate Scorecard to reflect its democracy mandate.
- Strengthen institutional reporting by publishing disaggregated data on engagement activities across regions, sectors, and stakeholder types, including an analysis of effectiveness and challenges.
- Enhance public reporting on engagement outcomes by publishing detailed summaries of stakeholder feedback and explaining how this input has been integrated into decision-making.
- Support international efforts to monitor civic space by collecting and publishing data on stakeholder engagement in EBRD-financed operations.
- Assess and report regularly on how civic space restrictions may impact the ability of communities and civil society to engage with the EBRD and its overall performance.
- Allocate adequate financial and human resources to increase the EBRD's capacity to support, monitor, and report on stakeholder engagement across its operations.
- Enhance staff and client capacity by offering training, technical support, and incentives to promote meaningful stakeholder engagement.
- Foster institutional learning by conducting regular impact evaluations of stakeholder engagement and integrating findings into operational and policy reform.
- Publish action plans, budgets, and implementation progress reports under the EBRD's Approach to Civil Society Engagement and its Civil Society Capacity Building Framework.

- Encourage the IPAM, the OCCO, and the Independent Evaluation Department to monitor and publicly report on stakeholder engagement activities and outcomes in addition to issues related to stakeholder engagement across the EBRD's operations.
- Enhance transparency of the OCCO's operations by disclosing – through the Integrity and Anti-Corruption Report – sufficient information on retaliation-related complaints submitted by civil society and follow-up actions taken by the OCCO.
- Broaden participation in institutional consultations by proactively reaching out to grassroots movements, community-based organisations and marginalised groups, and transparently sharing outcomes and planned actions.
- Support enabling conditions for meaningful stakeholder engagement by addressing legal, political, and institutional barriers that restrict civic participation, and provide guidance to clients and shareholder countries on safeguarding civic space.

Conclusions

The EBRD's unique political mandate – to support democracy, pluralism, and market economies – requires robust stakeholder engagement. Integrating stakeholder engagement metrics into its Corporate Scorecard would strengthen the EBRD's ability to demonstrate development and transition impact, while reinforcing its credibility with civil society, shareholders, and donors.

As other multilateral development banks like the World Bank and the ADB increasingly monitor and report on civic engagement as part of their Sustainable Development Goal-aligned impact metrics, adopting similar practices would bring the EBRD in line with emerging global standards.

A more systematic approach to monitoring and reporting stakeholder engagement would also improve the EBRD's ability to track trends, identify challenges, and refine engagement strategies. This would support better compliance with safeguards, enhance social acceptance of projects, and ensure that investments promote good governance and long-term stability.