

ACCOUNTABILITY REPORT

OF THE

EUROPEAN ENVIRONMENTAL BUREAU

2015

Submitted to the Secretariat of
Accountable Now

February 2017

SECTION I¹

1. Strategic commitment to accountability

1.1 Statement from most senior decision-maker

The European Environmental Bureau (EEB) was founded in 1974 by nature conservation and environmental organisations when it became increasingly clear that many environmental challenges could not only be fought at local or national levels. Our task was, and still is, to follow and contribute to the continually evolving environmental policy of the European Union.

For four decades, the EEB has been a reliable and motivating hub for a large number of national and international environmental organisations. We provide information about existing and upcoming EU policies, inform EU decision makers about the views and demands of our members and seek their support, while also working in coalitions with other organisations (including those outside the environmental movement) to share and promote our views.

Our successes lie mainly in defending or increasing the level of ambition of EU legislation and policy, and campaigning for proper enforcement of agreed laws. We do not only focus on new legislation, we also get involved in the more technical – and less spectacular – aspects of implementing EU law. Without this work nothing would change. We constantly work to help our members better understand EU environmental policies, allowing them to better mobilise the public and decision makers to support a progressive role for the EU on environment and sustainable development.

The EEB remains a unique organisation due to its inclusiveness (being open for any genuine environmental organisation to join) and breadth of scope. We aim to cover all essential aspects of environmental policy and look to sustainable development and environmental democracy as the means to reduce the EU's unsustainably large ecological footprint.

One area in which EEB has played a leading role in shaping EU and broader European policy is with respect to transparency and accountability in the environmental field. For the past two decades, we have coordinated NGO input into the negotiation and implementation of the Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters. It is therefore logical that we should keep our own standards of transparency and accountability under review and always seek to improve them. Our participation in Accountable Now contributes to that goal.

EEB membership of Accountable Now marked a significant commitment to achieving increased accountability in all our operations. For the EEB, accountability means:

- Clear reporting to our members on how we have implemented the annual work programme and budget they adopt through the General Assembly and to our donors on how their grants have been used;
- Stimulating membership engagement to make sure that our members' views are reflected and represented in our activities;
- Responsibility to provide transparent information about our purpose, goals, governance structure, funding, activities and achievements to the general public via our website and other communication tools.

¹ The numbering of paragraphs in this document follows that of the template provided by Accountable Now (including where some numbers appear to be skipped).

To EEB members, we provide detailed reports of activities and budgets at Board meetings and Annual General Meetings. We provide comprehensive reports to each funder according to the funder's requirement, detailing how funds have been spent and indicating impact against stated objectives. The highlights of EEB policy engagement and a summary of achievements as well as the annual accounts are communicated each year in the Annual Report. Activities are communicated through press releases and publications, as well as in real time on social media. Funder and financial information are accessible to all via the EEB website.

Transparency is a core value of the EEB. This does not of course imply that all information is in the public domain. For example, when EEB members come together to strategise on how to pursue a certain policy objective, e.g. tackling the failure of the EU and its Member States to enforce regulations in relation to vehicle emissions, it probably goes without saying that they need to be able to do so in a closed discussion.

The EEB annual work programme and multi-annual strategic plan rely on the input of our member organisations, being adopted by the General Assembly. In our Working group meetings and Board meetings, decision-making is conducted according to transparent, clearly defined procedures.

In 2014, the EEB undertook a lengthy process in collaboration with the Staff and the Board to develop a Long-term Strategy to succeed the 2010-2014 Strategy. The Strategy was discussed by the General Assembly at the 2014 AGM and a mandate given to the Board to incorporate the input, further develop and finalize the Strategy. In October 2016, following a lengthy process of additional consultations involving the Staff, Board and full membership in 2015-2016, the EEB adopted a [Medium Term Strategy](#) covering the years 2016-2019. The Strategy embraces policy, communication and organisational development. It lays out the EEB vision and goals as well as the modus operandi for members and staff to work together with other stakeholders to bring about environmental and sustainability policy change.

We take the responsibility to encourage and support our member organisations to respect high standards of accountability in their own operations.

The EEB underpins its commitment to further strengthen its standards of transparency and accountability by linking to our accountability reports on our home page, as well as by using the Charter's logo. While further progress is needed to develop reporting indicators and publicise evidence, the EEB is working towards building an accountability evidence bank that will be understandable, meaningful and accessible to all stakeholders. Membership of Accountable Now and publication of this report is a significant step for an EU-NGO toward improving and communicating organisational accountability.

Brussels, 30 December 2016



Jeremy Wates
EEB Secretary General

2. Organisational Profile

2.1 Name

European Environmental Bureau (often abbreviated as EEB)
Bureau Européen de l'Environnement in French

2.2 Primary activities

The EEB has a vision of a world in which all people of present and future generations are able to enjoy a rich, clean and healthy environment, where there is prosperity and peace for all; a world in which responsible societies respect the carrying capacity of the planet and preserve it for future generations, including its rich biodiversity. This vision requires prioritising long-term sustainability over short-term objectives that only meet the demands of the present generation or certain sections of society.

The EEB stands for sustainable development, environmental justice, global equity, transparency, participatory democracy and shared but differentiated responsibilities. We promote the principles of prevention, precaution and the polluter pays. Our mission is to be the environmental voice of our members and European citizens. We focus on influencing EU policymaking and promoting better implementation. We aim to be effective by combining expert knowledge with representativeness, active involvement of our members and coalition building.

The EEB's main activities involve developing and promoting environmental policies. In working towards its vision and promoting its values, the EEB seeks to influence policy-making through credible campaigns.

Our methods include the following:

- Advocacy at all stages of the decision-making process, notably with the Commission, the Parliament and the Council, in the latter case availing of our extensive membership network to influence Member State positions;
- Providing high-quality information and promoting positions through various types of documentation, ranging from detailed research reports, memoranda setting out policy demands, open letters to high-level decision-makers and leaflets;
- Conducting awareness-raising, media and outreach activities, e.g. using press releases, short videos and the website to get messages across; and
- Organising or participating in conferences, seminars and workshops.

These methods require us to work with experts, scientists, politicians and our members to develop and promote sound environmental policy.

The EEB makes some use of outsourcing, for example for the maintenance of our IT services. At a more substantive level, we regularly hire consultants to represent environmental interests in

technical bodies (e.g. in relation to the implementation of REACH or the Industrial Emissions Directive) where this cannot be done within existing staff capacities.

To maximise effectiveness, the EEB works in coalitions – on horizontal or high-level strategic issues with the Green 10 and the Spring Alliance (more information below), and on more specific topics through single-issue coalitions such as the Zero Mercury Working Group for global eradication of mercury, the Public Participation Campaign for increasing public participation and transparency or the Coalition for Energy Saving, as well as in ad-hoc coalitions.

2.3 Operational Structure

The EEB is a European federation of non-governmental environmental organisations. It is made up of full members, associate members and honorary members.² Full members are non-governmental organisations that are legal entities and are registered in country which is a member state of the European Union, is considered by the European Union as a candidate for membership of the European Union or has applied for such membership, is part of the Eastern Partnership or is wholly located within the continent of Europe.

Under Article 5 of the Statutes, full members must have as their main objective the conservation, promotion and study of the environment, the latter with the explicit aim of advancing environmental protection.

Associate members are also non-governmental organisations, legal entities in their own right and active in environmental protection but which do not meet the criteria for full membership. Honorary members are individuals who are selected by the EEB in light of the moral support or actual work that they have contributed to the EEB. Only full members have the right to vote.

The General Assembly made up of the EEB members serves as the ultimate decision-making body, meeting annually to adopt the work programme and budget for the following year among other things. It elects a Board comprising one representative of an EEB member organisation from each Member State where the EEB has one or more full member organisations, and may elect up to three additional representatives of member organisations. At the 2015 AGM, the statutes were amended to provide additional seats on the Board for up to ten representatives of European networks. The General Assembly also elects a President, at least two Vice-Presidents and a Treasurer, who also serve as members of the Board, being from one of the aforementioned categories. The Board has full power to manage and administer the EEB between meetings of the General Assembly.

The Board appoints a Secretary General who serves as the chief executive of the organisation.

The Secretary General's responsibilities include:

- Leading the EEB's advocacy work to achieve effective and lasting improvements in EU environmental policy;
- Representing the EEB in high level meetings and expert groups;

² A fourth category of 'affiliate member organisation' was added at the 2016 AGM, and some adjustments were made to the definition of 'associate member organisation'. However, these and other changes which occurred in 2016 are not reflected in this report, which describes the situation as it was at the end of 2015.

- Maintaining relations with the European Commission, European Parliament, European Council, Council of Ministers, and other relevant bodies and officials;
- Overseeing the development of EEB positions on environmental policy issues;
- Managerial oversight of the EEB office and organisation;
- Supervision of the work of EEB staff and representatives;
- Fundraising;
- Preparation of the meetings of the EEB General Assembly and Board;
- Strengthening cooperation between the EEB member organisations;
- Serving as the EEB's chief spokesperson;
- Shaping the long-term strategic planning of the EEB.

The EEB functions on a day-to-day basis from its office in Brussels. The staff in 2015 comprised five teams, namely the Secretary-General's Unit, the EU Policy Unit, the Global Policies and Sustainability Unit, the Membership and Communication Unit and the Administration and Finance Unit.

The EEB works in coalitions such as the Spring Alliance and several ad-hoc coalitions. The Spring Alliance is a network of organisations set up by the EEB, the European Trade Union Confederation (ETUC) and Social Platform. Together with CONCORD, the umbrella group for development NGOs, these organisations make up the steering committee of the Spring Alliance. The Spring Alliance stands for a European Union that puts people and the planet first. To this end, it has produced a manifesto and many civil society organisations from within the European Union have signed up to this.

The EEB also works in political alliances. It is an active member of the G10, a grouping of ten of the largest Brussels-based green NGOs working at EU level. The EEB has also been working with ETUC since 1995, the European Consumers' Organisation (BEUC) for over a decade on product related issues and with individual companies on product and on waste related issues.

The EEB has established working groups to develop policy positions, provide fora for information exchange between the EEB and its members and plan concrete actions. These groups are made up of representatives of EEB member organisations and meet usually once or twice a year. They are generally serviced by the responsible EEB Policy Officers, who work to promote the demands of the members by communicating with the European Institutions.

2.4 Location of organisation headquarters

The legal seat and the present headquarters of the EEB are in Brussels, 34 boulevard de Waterloo, B-1000 Brussels.

2.5 Number of countries where the organisation operates

The EEB has full and associate members located throughout Europe in more than 30 countries. At the end of 2015, it had members in Austria, Belgium, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, Former Yugoslav Republic of Macedonia, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Luxembourg, Malta, Moldova, Netherlands, Poland, Portugal, Romania, Russia, Serbia, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkey, Ukraine and United Kingdom.

The EEB membership list can be found at www.eeb.org/index.cfm/members.

2.6 Nature of ownership and legal form

The EEB is a European-wide organisation, registered in Belgium as an international not-for-profit association (association internationale sans but lucratif – AISBL) in accordance with Belgian law, whose full and associate members are separate legal entities registered in their own countries. The statutes of the EEB establish the constitution and legal status of the EEB.

2.7 Target audience and affected stakeholders

In line with its goal of influencing the formulation and implementation of EU environmental policy, the EEB's primary target audiences are the EU institutions – notably the European Parliament, the European Commission and the Council – and the EU Member States in their capacities of shaping the positions of the Council and implementing EU policy and legislation at the national and sub-national levels.

The EEB also seeks to influence other institutions and stakeholders whose positions may in turn influence the primary target audiences. The EEB's affected stakeholders include the aforementioned target groups; they include the other members of the coalitions in which the EEB participates; they include businesses that are affected, one way or another, by environment-related policies; they include EEB members, full and associate, and staff; and they include the wider public.

Environmental challenges for Europe can and do overlap with global and international environmental challenges. Climate change, air pollution and water quality are all examples of issues that require attention at an international level. Consequently, the EEB, in recognising the inter-connected relationship of environmental factors worldwide, does not limit its campaigns to Europe.

Citizens around the world may therefore also be seen as stakeholders. An example of how this is the case is the Zero Mercury Campaign. As a global campaign, the EEB is working with other non-governmental organisations within the framework of the Zero Mercury Working Group to control the demand and supply of mercury from all sources, with the aim of reducing mercury both in the European Union and around the world.

The EEB Global Policies and Sustainability Unit is dedicated to global and regional policy processes that support or affect environmental sustainability, such as those under UNEP and OECD, and the Rio+20 follow-up process which led to the adoption in 2015 of the 2030 Agenda for Sustainable Development and the Sustainable Development Goals.

2.8 Scale of reporting organisation (2015 data)

Total number of members and/or supporters: 139 member organisations at the end of 2015, themselves having a combined membership of some 15 million citizens.

Total number of staff posts: 33

Total number of volunteers: 10 (average of about 2 at a given time)

Income for 2015: 3,266,047 Euros

Expenditure for 2015: 3,266,047 Euro

Assets: 2,904,397 Euros

Liabilities: 2,904,397 Euros

Our activities cover awareness-raising, communication and advocacy across a broad range of environmental topics, with the primary focus being on the EU level and therefore on key decision makers and stakeholders engaged in EU processes. Virtually all environment-related topics are covered in some sense (e.g. by being referred to as explicit policy demands in our memoranda to incoming EU Presidencies), some in depth and others rather more generally.

The scale and scope of activities can be seen via the EEB website www.eeb.org/index.cfm/activities.

2.9 Significant changes during 2015

In 2015, the EEB adopted statutory changes to provide additional seats on the Board for up to ten representatives of European networks. At the 2015 AGM, it appointed four representatives of such networks to the Board.

2.10 Awards received in the reporting period

None

3. Report parameters

3.1 Reporting period

Calendar year 2015

3.2 Date of previous report

In June 2016 the previous report for the year 2014 was submitted.

3.3 Reporting cycle

Annual

3.4 Contact for any questions regarding the report

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3.5 Process for defining report content

Due to its nature as a federation of European environmental organisations, the EEB's work is to a large extent defined by the demands of its members. It follows that the EEB expects that stakeholders who will have most use for and interest in the content of this report will be those who represent and work on behalf of its member organisations throughout Europe. In light of this consideration, the EEB has prioritised and included information that it considers useful to these member organisations.

The EEB occupies a unique position in bringing together the policy demands of different European environmental organisations and presenting these at an EU level. Therefore this report focuses on the effectiveness of this unique position and how effectively the EEB is serving its members' interests. EEB has produced this report using the Accountable Now Reporting Template.

The accountability report once finalised will be disseminated to members and a dialogue will remain open with them to encourage them to engage in the principles of Accountable Now reporting, and promote enhanced accountability in their own operations. The report will be posted on the EEB website to further demonstrate the EEB's commitment to accountability.

3.6 Boundary of the report

The focus of this report is the functioning of the EEB as a federation, covering the main aspects of its governance such as General Assembly, Board, working groups and staff.

3.7 State any specific limits on the scope or boundary of the report

The report does not attempt to cover the activities of the member organizations except insofar as they are relevant to the functioning of the EEB's activities as a federation.

3.8 Basis for reporting on national entities, joint ventures, subsidiaries, outsourced operations or other entities.

None of the EEB member organisations has provided information for this report in full, partially, anecdotally, or with regard to financial data. Since formally associated entities have not reported in full, we have no systematic assurance that national and regional entities comply with our Charter accountability commitments.

While the report does not cover the activities of EEB member organisations, the EEB through routinely bringing its own endorsement of the Charter to the attention of its member organisations has indirectly encouraged them to also comply with it and we will continue to do so. It would not be feasible within current resource constraints to carry out any compliance assurance in relation to the individual member organisations, nor is there any mandate to do so, and indeed the fact that the membership criteria laid down in the EEB statutes do not refer to the Charter would prevent any imposition of the Charter and argue rather in favour of continuing a recommendatory approach.

3.10/3.11 Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.

None

3.12 Reference Table

This report follows the structure of the Reporting Template.

4. Governance and stakeholder engagement

4.1 Governance structure and decision making of the organisation

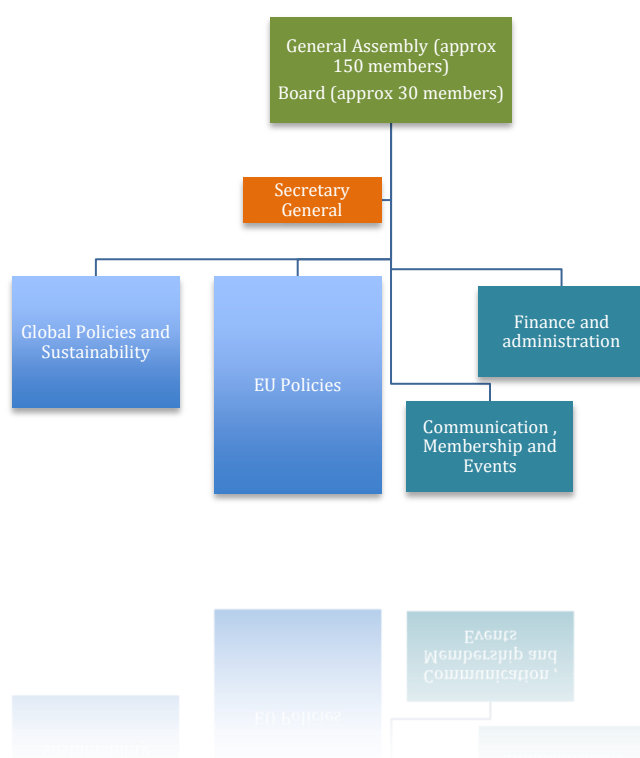
The body of the EEB vested of all the powers necessary for achieving the realisation of the objective of the EEB is the General Assembly. The General Assembly convenes at least once a year, at a time, place and date that is decided by the Board.

The EEB is managed between meetings of the General Assembly by a Board, which is elected by the General Assembly. One representative of an EEB member organisation from each Member State where the EEB has one or more full member organisations sits on the Board and represents the full member organizations from that country. The Board may also include up to three additional representatives of member organisations. In 2015, the EEB adopted statutory changes to provide additional seats on the Board for up to ten representatives of European networks.

The Board includes a President, at least two Vice-Presidents and a Treasurer who are all elected by the General Assembly.

As mentioned in article 14.3 of the Statutes, Board members are elected for a period of three years and may be re-elected. The Statutes do not specify a limit as to how many times a Board member may be re-elected.

The EEB Secretary General is responsible for the day-to-day running of the organisation, including the office and staff of the EEB. The staff is divided into five teams, namely the Secretary-General's Unit, the EU Policy Unit, the Global Policies and Sustainability Unit, the Membership and Communication Unit and the Administration and Finance Unit.



Involvement of the membership in the policy work is enhanced by the existence of a number of working groups addressing specific topics (see also NG01 response). The topics for which there were working groups in 2015 are listed in the response to NG05.

4.2 Division of powers between the highest governance body and the management and/or executives

The President, who serves as Chair of the Board, is elected by the General Assembly and is not an Executive Officer. The Board has the power to appoint and to dismiss the Secretary General. The Secretary General is an employee of the EEB and is not a member of the Board. The Board is his/her employer. Thus there is a clear division of responsibility between the highest governance body and the management and/or executives.

The Board has an oversight role in relation to the management of the organisation and the implementation of the work programme by the Secretary General and his/her staff. It provides a link between the membership and the EEB office which is cross-cutting and horizontal (by contrast with the EEB working groups which also provide such a link but of a topic-specific nature).

The Board also has a political role, e.g. periodically meeting with the EU Environment Commissioner or President of the EU Environment Council; and a policy role, i.e. determining policy positions, usually at the request of the Secretary General in situations where there is no topic-specific working group to formulate policy and no pre-existing policy to serve as a basis.

The Board's oversight of the financial management (for which the Secretary General has day to day responsibility) is delegated to a Management Committee consisting of the President, the Treasurer and one or more other Board members, which reports to each Board meeting. The Board also establishes time-limited task forces to work on specific issues. There were no formal task forces in 2015.

The EEB Secretary General is responsible for the day-to-day running of the office and staff of the EEB.

Specifically, his/her responsibilities include the following:

- Leading the EEB's advocacy to achieve effective and lasting improvements in EU environmental policy;
- Representing the EEB in high level meetings and expert groups;
- Maintaining relationships with the European Commission, European Parliament, European Council, Council of Ministers, and other relevant bodies and officials;
- Overseeing the development of EEB positions on environmental policy issues;
- Managerial oversight of the EEB office and organisation;
- Supervision of the work of EEB staff and representatives;
- Fundraising;
- Preparation of the meetings of the EEB General Assembly and Board;
- Strengthening cooperation between the EEB member organisations;
- Serving as the EEB's chief spokesperson;
- Shaping the long-term strategic planning of the EEB.

4.3 Number of members of the highest governance body. How many are independent and/or non-executive members?

In 2015, there were 37 members of the EEB Board. All are non-executive.

4.4 Mechanisms for internal stakeholders, shareholders and employees to provide recommendations to highest governance body.

Some of the key decisions made by the General Assembly, notably the adoption of the draft work programme for the forthcoming year, are based on proposals from the Board, which in turn have been drafted by the Secretary General with the extensive support and involvement of the staff.

There is no formal right for the staff to make representations to the AGM other than through the Secretary General. However, members of staff are routinely encouraged and in some cases required to attend the AGM and provide support (e.g. expert technical or policy input) to the discussions as needed.

Apart from participating in the AGM discussions on issues such as the work programme and budget, individual member organisations may bring issues of specific concern directly to the attention of the General Assembly by tabling resolutions.

In 2015 as each year, the annual Staff Retreat provided an opportunity for the staff to come together to assess the strengths, weaknesses, opportunities and threats facing the EEB, to influence positions on certain topics under discussion within the highest governance body via the Secretary General and to set up staff led working groups to lead on issues of concern to staff so as to develop new internal policies that work for all levels of staff. The second day of the 2015 staff retreat that was held 8-9 July in Leuven included an extensive working session on the EEB's internal policies and Accountable Now commitments.

4.5 Compensation for members of the highest governance body, senior managers, and executives (including departure arrangements).

Members of the General Assembly and Board are generally not compensated for their time. They are entitled to claim reimbursement for out-of-pocket expenses such as travel and accommodation related to participation in Board meetings and AGMs. For many years, a provision of €10,000 has been made in the annual budget for covering costs associated with the activities of the President but this has rarely been drawn upon. Exceptionally, virtually all this amount was used in 2015, due to an increased level of activity of the President and the fact that he ceased to receive a salary from the EEB member organisation which had hitherto been covering his time spent on EEB work.

The current Secretary General's salary was negotiated upon entry (May 2011) taking into account his previous salary and other salaries of CEOs in the environmental NGO sector in Brussels. A review of the salary scale for all staff is still ongoing, following a decision to link this with a broader review process being undertaken by a group of Brussels-based NGOs. The aim is to ensure that the EEB's system of salaries and related benefits contributes to the effective delivery of the EEB's work programme, takes account of the organisation's limited resources and the need to deliver value for money, attracts and retains high quality staff, recognises the individual needs of staff (e.g. in relation to career development opportunities) and ensures fairness. There are no specific rules or guidelines governing departure arrangements.

4.6 Processes in place for the highest governance body to ensure conflicts of interest are identified and managed responsibly.

The highest governing body of the EEB is the General Assembly where all the member organizations are represented. The statutes specify that all full members (those with decision-making power) must be 'independent of any commercial, industrial or party political influence or interest' (Art. 5.1). These criteria are applied by the General Assembly in relation to organizations applying for EEB

membership (see section 4.15 below for more information on the membership application process). With respect to existing members, it would be open to the Board, the Secretary General or any member organization to raise a concern over whether a member continues to meet the above criteria, ultimately by bringing the issue to the attention of the General Assembly, though this has not happened in recent years.

As regards other levels of the organization, the Board has adopted an anti-corruption policy. Through this policy, the EEB commits to a strict zero-tolerance policy on corruption. Specifically, the EEB commits to:

- tackle all instances of both high-level and low-level mismanagement and corruption with equal conviction;
- deploy resources to fight any corruption in a targeted and efficient manner;
- respond quickly and professionally to any indications of mismanagement or corruption;
- ensure sufficient anti-corruption capabilities.

4.10 Process to support the highest governance body's own performance.

The main procedures governing the functioning of the General Assembly are laid out in the Statutes and the Standing Orders. The Board is mandated under the statutes to develop its own procedures governing decision-making, including decision-making between meetings, and all other actions of the Board, provided these are consistent with the Statutes themselves. The Standing Orders of the General Assembly apply mutatis mutandis to the actions of the Board where the Board has not established its own procedures with respect to a matter. Additional procedures and rules have been established through decisions and recommendations of the General Assembly and the Board over the years. In 2014, a process of bringing together all these rules into a single document for the sake of greater clarity and transparency was initiated. The first consolidated version of this document was completed, with a number of placeholders, in 2015.

At a more operational level, there is not a formal process in place to evaluate the General Assembly's performance, the main 'check' being provided by the transparent and democratic procedures of the General Assembly themselves. As regards the Board, the increase in its size resulting from the decision to expand the range of countries from which full member organizations (and therefore Board members) may come, coupled with the decision to further expand the Board by providing seats for representatives of a certain number of representatives of EEB member organizations that are European networks in their own right, resulted in discussions on the functioning of the Board that continued throughout the year.

4.12 Externally developed environmental or social charters, principles or other initiatives to which the organisation subscribes.

The EEB does not subscribe to any permanent charters relating to our own modus operandi other than Accountable Now.

The EEB frequently collaborates with other stakeholders to prepare and sign up to externally developed statements promoting environmental and/or social principles. Some of these are aimed

at providing input to a decision-making process, sometimes on a specific policy issue, at a specific moment in time; others have a longer shelf-life and may be more horizontal in scope, such as the revised [Spring Alliance](#) manifesto issued in 2014.

4.14 List of stakeholder groups

The internal stakeholders are the EEB members. These are listed on the EEB website. EEB stakeholders also include individuals, Member State governments, the political institutions of the European Union, funders, media, volunteers, academic institutions, peer organisations, networks, coalitions and strategic alliance members.

4.15 Basis for identifying stakeholders

Article 5 of the Statutes addresses the procedure by which an organisation or body can become a member of the EEB. An organisation wishing to join the EEB must apply to the EEB for membership. An organisation applying for admission as a full member or as an associate member must provide a copy of its act of constitution, by-laws or articles of association and most recent annual and financial report to the EEB Board. In addition, as mentioned above, the applicant must establish that it is not dependent on any commercial, industrial, or political influence or interest.

When a membership application is received, the Management Committee appoints two scrutineers to assess the application (including the fulfilment of the independence criteria) and report to the Board which in turn makes a recommendation to the General Assembly. Based on the recommendation presented and all the documentation provided, the General Assembly then decides on whether to grant membership to the applicant.

In the case of honorary members, the procedure differs. The Board can nominate individuals for honorary membership. Full members are able to propose individuals for honorary membership. These proposals are made in confidentiality to the President of EEB, who presents the proposal to the Board. The Board makes a decision at the General Assembly.

EEB Policy Officers identify external stakeholders as targets or multipliers for their communications outreach, in order to realise their strategic objectives. These include Member State governments, the political institutions of the European Union, industry stakeholders, academic institutions, peer organisations, networks, coalition and strategic alliance members, and funders. The EEB communications team manages relations with Brussels based media.

The Secretary General interfaces with high-level stakeholders including EU Environment Ministers and European Commissioners and is invited regularly to international conferences to address global stakeholder audiences. Policy teams reach out through their communications to volunteers and citizens to engage them in EU environmental policy making.

SECTION II

1. Programme effectiveness

NG01 – participation of affected stakeholders in the design, implementation, monitoring and evaluation of policies and programs

Internal stakeholders such as the EEB membership and staff participate actively in the design, implementation, monitoring and evaluation of the EEB policies and the EEB work programme. As regards the policies, one way that the EEB tries to achieve this is through its working groups, of which there were seventeen in 2015. The working groups are established by the General Assembly and run by the relevant EEB policy staff and those representatives of the EEB's member organisations which are active in the area of work being addressed by the working group in question. Working groups are one of the key places where policy is formulated, refined and evaluated. In 2015 the EEB organised 31 meetings of the Working Groups, one annual meeting of the General Assembly (AGM) and three meetings of the Board.

As regards the work programme, the first draft of the next year's work programme is initially built up within the staff, with input being solicited from the full membership through an online survey, before being transmitted to the Board and then the AGM. Thus the staff are mainly involved in the early part of the process, with the EEB members having the final say through reviewing and revising the draft in the Board before finalising and adopting it at the AGM.

As regards the process of reviewing and reporting on the work programme, a report from the Secretary General on implementation of the work programme is submitted to the General Assembly shortly before the AGM covering the period since the submission of the equivalent report to the previous AGM. In addition, two interim reports from the Secretary General are submitted to the Board at more or less four-month intervals during the year. All of these reports are drafted with input from the staff, with the work programme text for each area of activity copy-pasted into the report for ease of comparison and to facilitate its use as an accountability tool.

There is clear evidence that stakeholder engagement processes have positively affected EEB decision-making or reshaped policies and procedures. As regards internal policies, staff have also influenced the outcomes, such as on policies on reducing the environmental footprint of the Brussels office.

The EEB Strategy 2010-2014 identified the need for development of an Extranet facility which can be accessed by member organisations. The objective of the Extranet is to enable an enhanced flow of information between EEB and its member organisations. This provides member organisations with access to EEB organisational documents and the development of working group activities. The system set up in 2011 was never sufficiently used due mainly to its poor design. In 2015 it was agreed to invest in developing the EEB's internal and external communication tools in 2016. The aim of the investments is to give the EEB a fresh and coherent look, facilitate EEB staff working remotely,

reduce manual work caused by outdated and non-synchronized tools and strengthen membership engagement by providing a new platform for sharing documents.

As regards external stakeholders, they are able to engage in and influence the EEB's policies through their involvement in EEB conferences, seminars and workshops. For example, the EEB Annual Conference normally brings together a wide range of external stakeholders, ranging from high-level politicians and officials through representatives of business, trade unions and academia to other environmental NGOs.

There are initiatives that the EEB has introduced to facilitate communication with stakeholders who are primarily member organisations that it is actively working with. Initiatives include inviting EEB members to comment and submit proposals on the draft EEB work programme for the upcoming year through online surveys; the circulation of information on EU policy developments to members; sending members an electronic newsletter every three months with information on upcoming EEB activities; and providing information on Commission consultations to members.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to achieve over a three-year period the following improvements as regards processes for involvement of affected stakeholders:

- *Assess mechanisms for stakeholder engagement in order to identify areas for improvement.*
- *Create a dynamic visual representation that shows where all EEB members are, Europe-wide plus locally within each Member State. This will facilitate understanding of the reach of EEB and support networking.*
- *Create a visually impactful representation of the EEB decision-making structure and mechanisms for interaction among staff and members. This will facilitate understanding of EEB operations and promote greater levels of involvement.*
- *Send to all members the final version of the INGO report and ask them to commit to support the Charter accountability commitments in the period ahead.*
- *Enhance coordination with environmentally sustainable businesses, and relevant small and medium sized businesses to build understanding, capacity and commitment to environmentally sustainable business models.*

Little progress was made with the first point in 2015. The second and third point will be dealt with as part of the rebranding taking place in 2016 and the relaunch of the EEB website which will take place in early 2017. Concerning the third point, the 2015 Accountable Now report will be sent to EEB members once it has been submitted with an encouragement to support the Accountable Now principles. Concerning the last point, efforts to enhance coordination continued in 2015. EEB policy officers frequently held meetings with business and industry stakeholders to engage mutual interest on EU environmental policy, notably in relation to energy efficiency and the preparation of the new circular economy package that was issued in December 2015.

NG02 – mechanisms for feedback and complaints in relation to programs and policies and for determining actions to take in response to breaches of policies

The primary mechanisms for feedback and complaints in relation to EEB policies and implementation of the work programme from within the membership are communication within the relevant working group, or raising the matter with the relevant Policy Officer, the Policy Director, the Global Policies and Sustainability Director, the Head of Membership and Enforcement, the Secretary General or the Board, or submitting a resolution to the AGM. Generally the complainant is encouraged to start by addressing the complaint to the lower levels and only elevate it to the higher levels where it cannot be resolved at a lower level. Complaints from external sources are relatively rare but are generally handled in a similar way.

The EEB has not yet established and publicised a more formal complaints mechanism though the aforementioned anti-corruption policy provides some elements of such a mechanism.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards mechanisms for feedback and complaints in relation to programs and policies:

- *Survey member organisations on EEB performance to identify areas for improvement.*

Envisaged for 2017

- *Survey of EEB Staff on member engagement to identify areas for improvement.*

Envisaged for 2017

- *Establishment of a more formal and transparent complaints handling mechanism covering both internal and external complaints.*

In June 2014, the EEB adopted an anti-corruption policy which includes a complaints mechanism. The Board mandated two Board members and the SG to elaborate on three specific points in the policy. Unfortunately this task was not completed in 2015 due in part to the departure of one of the Board members responsible.

NG03 – system for monitoring, evaluation and learning (including measuring programme effectiveness and impact), resulting changes to programmes, and how they are communicated

Monitoring, evaluation and learning occur at different levels. At staff level, regular meetings between each Policy Officer and his/her supervisor are used to monitor progress and make adjustments as necessary, and the annual review meetings are used for a more thorough evaluation. At the level of the membership, the various working group meetings (see NG05) which occur typically once or twice a year per working group also provide an opportunity to monitor and evaluate their respective parts of the work programme and make adjustments. When the draft work programme for the following year is presented first to the Board and subsequently to the wider membership in preparation for eventual adoption at the AGM (see NG01), the changes to the previous work programme are explicitly described.

In addition, the EEB produces an activities report for the General Assembly each year in which it describes its responses to EU policy developments in each area of its work programme. Highlights of successful policy achievements are reported in the Annual Report with a view to reaching wider (including non policy) audiences.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvements as regards the system for program monitoring, evaluation and learning.

- *Strategic Plan 2015-2020 to include overarching and detailed KPIs.*
- *Annual KPI assessment, evaluation, identification of lessons to be learned, and set of detailed written recommendations*

Little progress was made with these tasks in 2015 apart from making progress on the indicators listed in the draft strategic plan.

NG04 – measures to integrate gender and diversity into program design and implementation, and the monitoring, evaluation and learning cycle

Gender awareness and respect for diversity are valued by the EEB and are taken into account both internally (e.g. in matters of recruitment) and externally (e.g. in identifying moderators, speakers and panellists for conferences). They do not play a big role in policy content, though the EEB is always supportive of the integration of gender and diversity dimensions in for example intergovernmental policy documents (e.g. the Rio+20 outcome document) and collaborates well with other organisations for which these issues are the main objective, e.g. Social Platform and its members. The EEB has a policy on non-discrimination, also covering gender (adopted in 2014).

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards measures to integrate gender and diversity into program.

- *Target: 50% women speakers/moderators/ panellists at EEB events. More speaker diversity at EEB events.*

The 2015 Annual Conference had 17 male and 8 female speakers. Several female speakers who were invited unfortunately could not make it. The 50% target must be considered as aspirational given the need to take into account other considerations and the fact of gender imbalance among top representatives of the stakeholders we are seeking to engage.

- *Enhanced coordination with EU-level gender, youth, development and diversity groups.*

Representatives of umbrella groups representing women (Women in Europe for a Common Future) and youth (Youth and Environment Europe) were among the four representatives of European networks elected to the Board in 2015 following the creation of new places in the Board for such networks. The EEB continued to cooperate and coordinate closely with such groups during 2015 (e.g. in the context of the Aarhus and SDG processes).

NGO5 – processes to formulate, communicate, implement, and change advocacy positions and public awareness campaigns

Advocacy and public awareness raising continue to be an important part of NGO work. To ensure solid legitimacy and effectiveness in these aspects of its work, the EEB works in close partnership with member organisations when adopting positions and advocating them in the context of EU policy. The EEB has created Working Groups across its Work Programme to formulate, develop and deliver policy positions in partnership with member organisations.

Working Groups in 2015 gathered experts on the following topics:

1. Agriculture
2. Air pollution
3. Biodiversity
4. Bio-energy
5. Chemicals (REACH)
6. Ecolabel
7. Ecological Product Policy
8. Energy efficiency
9. Environmental Fiscal Reform
10. Industry (IED/ Seveso)
11. Law-group
12. Nanotechnology
13. Natural resources / SCP
14. Soil
15. Waste
16. Water
17. Rio+20 follow-up

The ad hoc working group established to engage in the follow-up to the Rio+20 Conference (e.g. preparation of sustainable development goals) only worked virtually due to budget limitations. In addition, the EEB coordinated networks on mercury (the Zero Mercury Working Group, which we coordinate jointly with the Mercury Policy Project), the Aarhus Convention in the pan-European region and on OECD providing NGO input to OECD processes, but these serve a different function, i.e. they do not formulate EEB policy but rather are wider fora in which the EEB coordinates and interacts with other NGOs.

The EEB has organised many events involving key stakeholders. It has a range of means to ensure that it distributes information to its members and to stakeholders more generally. For example, it lists publications and press releases on its website and has created an online library of all its publications, found at <http://www.eeb.org/index.cfm/library/> which can be searched by type of publication, type of activity and date of the publication (month and year). The EEB publishes its own quarterly magazine – Metamorphosis – which is available online. The EEB e-mails relevant press clippings and information on consultations.

The EEB provides general information on what it is doing under each of its work programme areas on its website and more specific information to e-mail lists of the members of the working group. The contact details for the Policy Officer working at the EEB who carries responsibility for servicing each area of work are also provided on the EEB website alongside the information on the work activity. Media coordination between the EEB office and members at a national level is being improved.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards processes to formulate, communicate, implement, and change advocacy positions and public awareness campaigns

- *Review communication strategy to reach members and other stakeholders more effectively.*

A new strategic approach for external and internal communication was developed in 2015 in preparation for the re-branding project and upgrading of internal communication tools planned for 2016. This included surveying members and staff on their expectations and wishes for the new website (July 2015).

- *Provide targeted capacity building to member associations.*

In connection with the 2015 AGM, a capacity building workshop on the newly adopted Sustainable Development Goals was offered to all members. Capacity building elements were also included in several of the Working Group meetings held in 2015 (mini-trainings on implications of new policy initiatives etc.).

NG06 – processes to take into account and co-ordinate with the activities of other actors

Complex situations, numerous actors and fast moving targets are a reality for most NGOs. Strategic and effective coordination with the activities of other actors is important to reduce duplication, leverage impact and improve cost effectiveness.

The EEB firmly believes in the value of working closely with other organisations in order to ensure that as far as possible its position is consistent with those of actors holding broadly similar values and to reinforce EEB messages to stakeholder audiences. This has been particularly apparent in the context of collaboration within the Green 10, and within the Spring Alliance.

Our Policy Officers and Communications Officers constantly identify opportunities for engagement, collaboration, and coordinated activities to leverage our effectiveness. Evidence that this works well can be seen on the EEB website with publications, press releases and conferences organised and executed in partnership with like minded organisations and involving key stakeholders such as governments, multilateral institutions, and business to deliver speeches or participate in panel discussions. We aim to work with partners that meet high standards of accountability.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards processes to take into account and coordinate with the activities of other actors.

- *Enhance communication/ coordination/leadership with Green 10 and Spring Alliance*

Collaboration with like-minded stakeholders continued to be important during 2015, with the EEB playing a leading role in mobilising a major pushback against the newly installed Juncker Commission's anti-environmental agenda. Examples were the preparation by the EEB and three other G10 members of a major 'Nature Alert' campaign to defend the EU's nature protection laws, intensive lobbying to strengthen EU legislation on air pollution and a campaign to put pressure on the Commission to come forward with a new circular economy package by the end of 2015 that was genuinely more ambitious than the one it had needlessly withdrawn earlier in the year. In all cases, this involved working closely with other stakeholders, including from the G10 and Spring Alliance. The EEB also collaborated closely with Spring Alliance partners Social Platform and Concord in the lead-up to and follow-up from the adoption of the 2030 Agenda for Sustainable Development in September 2015.

2. Financial Management

NG07 – Resource Allocation

The initial allocation of resources for 2015 was made through the 2014 AGM's adoption of the Work Programme and Budget. However, as the implementation of the work programme is always dependent on income which is not confirmed at the time of the AGM, an evolving 'working budget' is subsequently developed under the authority of the Secretary General and the oversight of the Management Committee (a sub-committee of the Board which includes the President, a Vice-President and the Treasurer among others). This is continually updated with new information on income and anticipated costs. The allocation of resources and use of funds for different projects is managed and tracked through the use of an analytical bookkeeping system. All the payments are checked by the Accountant and the Finance Manager and signed off by the Secretary General and the Finance Manager. Each year, the Annual Accounts are audited by the EEB Auditors. Following this yearly control, the auditor delivers the statutory auditor's report that is presented to the General Assembly at the AGM.

Expenditure (Euros) 2015

General Costs:	275,934
Personnel Costs:	1,988,209
Activities:	900,474
Allocation to working capital:	20,585
Extraordinary costs:	80,845
<u>Total Expenditure:</u>	3,266,047

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards resource allocation.

- *Increase reserves*

The EEB managed to add 20.585€ to the reserves, bringing them up to 586,213€.

NG08 - Sources of funding by category, five largest donors & monetary value of their contribution

In the year 2015, the EEB's gross income was 3,266,047 Euros, coming from the following sources:

Trusts and Foundations:	1,306,646 Euros
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EU Commission:	1,113,765 Euros
Intergovernmental and Non-governmental Organisations:	416,601 Euros
Governments:	199,814 Euros
EEB Members:	141,092 Euros
Other:	88,129 Euros
<u>TOTAL</u>	3,266,047 Euros

Top 5 donors overall

EU Commission:	1,113,765 Euros
(of which 900,000 core grant)	
MAVA Foundation:	458,462 Euros
European Climate Foundation:	281,890 Euros
Villum Foundation:	277,321 Euros
Food and Agriculture Organization of the UN:	175,618 Euros

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards sources of funding by category and five largest donors.

- *Increase foundation funding and start to obtain appropriate private sector funding, while retaining current levels of EU LIFE funding.*

Levels of core grant funding under LIFE improved in 2015 over the previous two years though this was not due to any particular efforts of the EEB but rather to the fact that whereas the Commission had in previous years asked successful applicants to reduce their budgets by a certain percentage each year (varying according to the number of additional NGOs included as beneficiaries), for the 2015 grants successful applicants were awarded the exact amount applied for. However, the main reason for the 20% increase in Commission funding was separate grants to work on industrial emissions and product supply chains respectively. Levels of foundation funding declined slightly (by 2%) in 2015, with some grants coming to an end and being replaced by others, and government funding decreased by 13%, this being only partly offset by an increase of 5% in funding from membership fees. Efforts to explore private sector funding were not significantly pursued during 2015 as it was felt that the potential for further developing partnerships with foundations had not been sufficiently explored.

3. Environmental management

Climate change poses a fundamental and cross cutting threat to equitable and sustainable development. Alongside our work to influence external policies on climate change and renewable energy policy, we have progressively been putting in place internal measures to limit the negative environmental impact arising from the functioning of the organisation.

The staff working group 'Greening the EEB' aims to strengthen and make more explicit internal policies and measures for assessing and limiting the EEB's ecological footprint.

The EEB Staff meeting is the forum that monitors application of 'Greening the EEB' guidelines and reviews overall progress.

EN16 – Total direct and indirect greenhouse gas emissions by weight

EEB staff and members are required to report on their greenhouse gas emissions when travelling on EEB business. While the EEB started to collect this data in 2015, comprehensive benchmarks for improvements will only be set once there is sufficient reference data against which improvements can be measured.

EN18 – Initiatives to reduce greenhouse gas emissions and reductions achieved

As regards the EEB offices (see sections EN26 and EN29 for impacts related to procurement and transport policies), radiators are turned down at night in winter and lights switched off when not needed. We have no Environmental Management System (EMS) in place to provide a systematic approach to assessing, reporting and minimising our environmental impact, so reductions achieved are unknown. However, while being in rented premises imposes some limitations on what can be achieved, we will continue to explore whether and how more can be done to reduce GHG emissions through e.g. energy efficient lights, appliances and IT equipment in offices.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards initiatives to reduce greenhouse gas emissions.

- *Assessment of GHG impact of EEB activities, including office and EEB office equipment.*

A system was put in place in 2014 to monitor printing volumes, initially in order to identify a baseline for setting reduction targets. However, comprehensive benchmarks for reduction targets have yet to be set.

Waste sorting system is in place. Composting system is in place. Small hazardous and electronic waste sorting system is in place (inks, batteries, pens, mobile phones, lamps, etc) with three collection boxes in the office. Collection system for Electrical and Electronic Equipment waste in place: broken phones, headphones, desk lamps. Collection system for hazardous waste also in place:

detergents leftovers, paints, lamps.

- *More comprehensive use of green suppliers.*

The EEB aims to take environmental and sustainability concerns into account in the choice of suppliers and cost/benefit analysis. While a formal policy was not yet in place in 2015, the EEB served bio and fair trade food at its events and used green suppliers for office supplies and printed material whenever possible.

- *Web-conferencing to be extended to replace some additional face to face meetings.*

Further implemented in 2015.

EN26 Initiatives to mitigate environmental impacts of activities and services

As described above, we have started to measure some of the environmental impacts of the working practices used in pursuit of our programmes/projects/activities and to introduce internal policies aimed at minimising the environmental impacts of our activities and services – such as sourcing from green certified suppliers only. Catering supplies are generally sourced as organic and fair trade. Suppliers will be asked for their sustainability policy in the early stages of tendering.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement to mitigate environmental impacts of products and services.

- *Policy on green and fair trade suppliers to be further developed and applied. Assess credentials of current suppliers. All suppliers to be asked for copy of sustainability policy.*

Office procurement guidelines were practically in use but the formal EEB policy was unfortunately not finalised in 2015.

Greening EEB Meetings guidelines: It was agreed in 2014 that new EEB guidelines should be developed to reduce the environmental impact of EEB meetings, working groups and conferences. Guidelines should include all aspects of event organisation from preferred eco-friendly hotels to creation of folders. Greening EEB Meetings guidelines were practically in use but a formal policy was not finalised in 2015.

EN29: Significant environmental impacts of transporting products and transporting members of the workforce.

Among other measures, EEB staff travel by train to cities such as London, Paris, Amsterdam and Bonn. Use of taxis must be justified (e.g. late night/early morning) for both economic and environmental reasons. Web conferencing has been increasingly encouraged and used. The large

majority of staff use bicycles or public transport to journey to work. A supportive home working policy (typically one day per week) reduces congestion and city emissions.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards significant environmental impacts of transporting products and transporting members of the workforce.

- *EEB transport guidelines to be reviewed.*

The revised travel reimbursement form adopted in 2014 was further strengthened in 2015. The revised travel reimbursement guidelines explicitly increase the prioritisation of train over plane travel, and urban mass public transport over taxi and specify what mode of transport to take (requires measurement of distance).

The staff survey on journey to work undertaken in 2015 showed that the majority of the staff members come to the office by bike or walking.

Shared bike policy in place: bikes on long-term loan to the EEB are available to members visiting Brussels and staff that normally travel to work on public transport for use to get to meetings in town.

4. Human resource management

Having the right people with the necessary skill set, motivation and ability to perform, is essential for effective organisational development.

LA1 – Size and composition of workforce - total workforce, including volunteers, by employment type, employment contract, and region

For 2015

Total staff posts: 33

Employees on full-time contract: 23 (21 permanent contracts, 2 temporary contract)

Employees on part-time contracts: 10 (8 permanent contracts, 2 temporary contract)

Full-time volunteers/interns who work a minimum 30 hours a week: 10 temporary contracts

Part-time volunteers/interns who work less than 30 hours a week: 0 temporary contract

Occasionally mobilised volunteers who work on a non regular basis: less than 1

All employees apart from two (based in France) worked from the Brussels Office.

Volunteers are typically young university graduates interested in gaining experience working on substantive environmental policy issues and/or in relation to the EU institutions and are therefore usually assigned to work with policy staff. The arrangement is intended to be of mutual benefit. Further details are on the [website](#) (linked from the home page).

EC7 Process to ensure good local representation at all levels

The EEB has just one office, in Brussels. Our procedures for hiring are open and transparent and follow one or more rounds of interviews before a recruitment contract is offered. As we are a European federation and in order to respect the principle of diversity, we aspire to having a staff body which is geographically representative of the different parts of Europe, in particular as regards posts having a policy dimension. However, a majority of staff in administrative support posts are hired from the local community. Since Brussels is a focal point for multi-lingual policy experts, EEB recruitment does not undermine local NGOs or the local public sector.

LA10 Training to build necessary skills

Capacity building of staff in member organisations is critical to EEB success. However, training sessions – to build core competences - have been undertaken in a piecemeal way until now, as resources are limited.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following:

- *An average hours of training per year per employee of 16 hours in 2014, 24 hours in 2015 and 32 hours in 2016.*

Due to changes in staff and limited financial capacity, no formal training opportunities were offered in 2015. However, informal training opportunities were offered during thematic lunches (facilitated by EEB Policy Officers) and the annual staff retreat.

LA12 Employee development plans and appraisals - Performance reviews and career development plans.

Once a year (Dec/Jan), all staff have a performance review with their supervisor, which includes the opportunity to discuss career development. Staff also have the opportunity to give and receive feedback in the regular meetings with the supervisor.

LA13 Diversity in governance bodies and workforce - composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, other indicators of diversity, 2015.

Category	Gender %	Nationality - number	Age %
Board	Female: 41% (13)	26 - 29	Under 30: 0
	Male: 59% (16)		30 – 50: 15 (52%)
			50+: 14 (48%)
Senior Management	Female: 50% (4)	6 - 8	Under 30: 0
	Male: 50% (4)		30-50: 5 (63%)
			50+: 3 (37%)
Other staff ³ in Brussels Office	Female: 67% (20)	14 - 30	Under 30:3 (10%)
	Male: 33% (10)		30 -50: 25 (83%)
			50+: 2 (7%)

As regards minority groups: the current EEB staff and Board, while having a very high level of national diversity, do not currently contain individuals from ethnic minorities or with known disabilities.

³ The numbers here refer to the number of individuals who at one or other point during 2015 were staff members, as opposed to the number of staff posts, hence the discrepancy with the figures in 2.8 and LA1.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards composition of governance bodies and breakdown of employees.

- *Annual assessment of diversity (gender, age, nationality).*

See above.

NGO9 Grievance mechanism for employees

We have human resource policies that conform to relevant standards under Belgian law and are in accordance with the values of our organisation in terms of employee and volunteer rights, health and safety at work. The primary mechanisms for staff to raise grievances and get a response is directly with their supervisor or with the Head of Personnel (if different), depending on the nature of the grievance.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards internal feedback and complaints mechanism.

- *Grievance policy to be reviewed.*

As mentioned above, in June 2014, the EEB adopted an anti-corruption policy which includes a complaints mechanism. The Board mandated two of its members and the Secretary General to elaborate on three points in the policy. Unfortunately, no progress was made in 2015, partly due to one of Board members who had sought the further elaboration on those points having left the Board, but the remainder of the policy is in force.

5. Management of Impacts on Wider Society

SO1 Impact of activities on the wider community

The EEB makes a positive contribution to the wider society through its work for stronger environmental policies throughout Europe and beyond. To give one small example: the improvements to the National Emission Ceilings Directive which we pushed the EU institutions to accept in 2015, when eventually approved in 2016, represented the avoidance of thousands of pollution-related deaths per year in the EU. While the collateral impacts arising from our means of working (running an office of 30+ staff, holding a few dozen meetings at European level etc) are negligible by comparison with the impacts that we have on the wider environment and society, we strive to manage these collateral impacts in a positive manner. We incorporate CSO values into our work and into our policy positions, such as labour rights, human rights and child protection. We have positive feedback from partner CSOs.

SO3 Process for ensuring effective anti-corruption policies and procedures?

As mentioned above, in order to prevent the risk of corruption, the EEB Board has adopted an anti-corruption policy.

SO4 Actions taken in response of incidents of corruption.

We have not recorded or published incidents of corruption and fraud, since they have never happened.

6. Ethical fundraising and communication

PR6 – Programmes for adherence to laws, standards, and voluntary codes related to ethical fundraising and marketing communications, including advertising, promotion, and sponsorship.

In July 2011, the Board adopted a position on the ethics of fundraising from companies. The position includes the following:

“EEB directly denies gifts, donations etc from any company which states in its annual report that it to a noticeable part produces, sells, uses or supports, or which according to any other transparent and credible information, is involved in the following industries: (i) weapon; (ii) child labour; (iii) tobacco; (iv) pornography; (v) nuclear and mining of uranium. Any company that violates human rights is excluded from any collaboration with EEB.

“In addition, EEB reserves the right to refuse support from any company or other organisation, if the support directly or indirectly originates from an activity that is incompatible with EEB basic values and working methods. In such cases EEB decides in individual cases. This can for instance relate to companies involved in fossil fuels production, logging of natural forests or that violate widely accepted social standards.”

The types of companies listed here were considered to be indicative examples. It was agreed that beyond respecting the above guidance, the Secretary General should use discretion in specific cases and revert to the Management Committee or Board if considered necessary to consult or seek endorsement.

Suggestions have occasionally been made that the fact that the EEB and other green NGOs receive a significant part of their revenue in the form of core funding from the European Commission could compromise their independence – the suggestion also being sometimes made that the Commission funds such organisations so that they will support its agenda. Even a brief review of the EEB’s public commentary (e.g. press releases, speeches etc) on the Commission’s performance and output shows such suggestions to be far-fetched.

The EEB is regularly critical and at times scathing in its criticism of Commission decisions and proposals, sometimes even bringing the Commission to court. In other words, whatever theoretical concerns there might be, the proof of the matter lies in our actions which are part of the public record. For its part, the Commission appears to respect our independence and has so far never attempted to use the fact that we are recipients of a core grant to exert policy influence. In any case, the EEB has sought to reduce its dependence on the EC core grant by increasing other sources of funding and has made some progress in this direction in 2015 (where the core grant represented 27.6% as compared with 39.6% in 2011).

The EEB is firmly committed to policies that serve the public interest. Our policies are determined on the basis of the expertise of our member organisations, which effectively channel the concerns and opinions of the environmentally concerned public across Europe into EEB policy making. The fact that we are a membership organization indirectly representing some 15 million individuals (i.e. the

members of our member organisations) helps to secure our independence and to ensure that our policy demands have a firm basis in the views of the environmentally aware public.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards programmes for adherence to laws, standards, and voluntary codes related to ethical fundraising and marketing communications.

- *Ethical fundraising policy guidelines to be reviewed with regard to private sector funding.*

A first draft of these guidelines was developed in 2014 but the issue was shelved due to a decision to prioritise further efforts to increase foundation funding. It was not felt necessary to address the issue in 2015.