



DRAFT 1

ACCOUNTABILITY REPORT

OF THE

EUROPEAN ENVIRONMENTAL BUREAU

2013

Submitted to the Secretariat of the International NGO
Accountability Charter

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SECTION I

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 intervene in the continually evolving environmental policy of the European Union.

For nearly 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, as well as 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 campaigning for real 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 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. 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 16 years, 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 the INGO Accountability Charter contributes to that goal.

Two developments of particular significance in 2013 were the General Assembly decisions to 1) open our doors to NGOs from further to the east through an amendment to the EEB statutes allowing NGOs from any country wholly located within the continent of Europe to apply to become full members of the EEB, and 2) integrate the staff and activities of ANPED (the Northern Alliance for Sustainability) into the EEB through the establishment of a new Global Policies and Sustainability, with effect from the beginning of 2014. These related decisions paved the way for, on the one hand, a geographical expansion, without changing the fact that the primary focus of the EEB is on the EU but in recognition of the strong influence of EU policies on neighbouring countries several of which

are expected to eventually become EU Member States; and on the other, a thematic expansion, allowing the EEB to more deeply engage in environmental and sustainable development processes at global and regional levels.

The political context in 2013 has remained challenging, with the pressures for deregulation, including in the environmental sector, which have gathered strength since the economic crisis began in 2008 finding new expression in the proposals for a new Transatlantic Trade and Investment Partnership between the EU and the US as well as the Commission's REFIT programme. The EEB has continued to resist such pressures, pointing to the benefits of stronger EU environmental policies not only for the environment but also for society and the long-term health of the economy, and placing its demands for specific environmental protection measures in the context of the need for a rapid transition towards sustainable patterns of consumption and production that fully respect planetary boundaries.

We remain accountable to both our members and our funders. We provide detailed reports of all our activities and budgets in regular meetings of the EEB Board. We provide comprehensive reports to each funder according to the funder's requirement, detailing how the funds have been spent, and indicating impact against stated objectives. The highlights of EEB policy impact, as well as a summary of all results are communicated each year in our Annual Report. Transparency underpins our operations with our annual reports, funders, income and expenditure, as well as publications, being easily accessible on the EEB website.

Our annual work programme and multi-annual strategic plan rely on the advice and input of our members for content, direction and adoption at the General Assembly. In our Working group meetings and Board meetings, decision-making is conducted according to clearly defined policy processes of open information, impartiality and independence.

We take the responsibility to encourage and support our member organisations to respect high standards of accountability in their own operations, and to further strengthen our own standards of transparency and accountability. We plan to step up efforts in this area in 2014 and resource the organisation adequately through the hiring of a Deputy Secretary General to support this important strand of EEB work.

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 including organising or participating in conferences, seminars and workshops; producing 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 lobbying 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. These methods require us to work with experts, scientists, politicians and our members to develop and protect 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. This is not outsourcing as such, though it involves extending beyond exclusive reliance of the capacities of the EEB staff.

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. 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 (sometimes referred to as the Executive Committee) 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. It also elects a President, at least two Vice-Presidents and a Treasurer. 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;
- 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 EEB Board meetings and Annual General Meeting;
- Strengthening cooperation with 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 2013 comprised four teams, namely the Secretary-General's Unit, the EU Policy 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 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 the European Trade Union Confederation (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 meet approximately twice a year. The groups are generally serviced by the responsible EEB Policy Officers, who hear the demands of the members and work to promote these demands 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 Bd. 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 30 countries. At the end of 2013, it had members in Austria, Belgium, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Luxembourg, Netherlands, Poland, Portugal, Romania, Russia, Serbia, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkey, Ukraine, United Kingdom.

The EEB membership list can be found at <http://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 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, are the EEB's primary target audience. The EEB also seeks to influence other institutions and stakeholders whose positions may influence the primary target audience. 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 could be affected by or who could promote stricter environmental controls; they include EEB members, full and associate, and staff; and they include the wider public.

Environmental concerns and issues that affect Europe can and do overlap with concerns and issues that exist on a global and international level. 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. Therefore, citizens around the world may 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.

During 2013, the EEB took steps to establish a new Unit dedicated to global policy processes that support environmental sustainability, such as UNEP, Rio 20+, EU-US trade negotiations and 2015 UN development goals. The Global Policies and Sustainability Unit was formally launched at the beginning of 2014.

2.8 Scale of reporting organisation (2013 data)

Total number of members and/or supporters: 137 member organisations at the end of 2013, themselves having a combined membership of some 15 million citizens.

Total number of employees:	21
Total number of volunteers:	8 (average of about 2 at a given time)
Income for 2013:	2,229,182 Euros
Expenditure for 2013:	2,250,372 Euro
Assets:	2,170,695 Euros
Liabilities:	2,170,695 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.

2.9 Significant changes during 2013

The EEB took steps in 2013 to establish a new Unit dedicated to global policy processes that support environmental sustainability. This Unit is staffed by the staff of the former ANPED organisation that has now been fully integrated into EEB operations. This reflects the significance of the EU as setting high environmental standards, and as such, a force for positive influence on the world stage, and also that global policies have a direct impact on the manoeuvrability of EU environmental policy makers.

2.10 Awards received in the reporting period

None

3. Report parameters

3.1 Reporting period

Calendar year 2013

3.2 Date of previous report

In July 2012 the previous report for the year 2011 was submitted using the GRI NGO Reporting Template.

3.3 Reporting cycle

Bi-annual

3.4 Contact for any questions regarding the report

Joanna Sullivan, Deputy Secretary General
joanna.sullivan@eeb.org
tel: +32 (0) 2 289 10 90

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 demands of different European environmental organisations and presenting these at an EU policy 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 GRI NGO Sector Supplement 3.0, Level C Reporting Template. In doing so it has aimed to address the performance indicators specified in the INGO Accountability Charter Instructions. The EEB has considered the principles for defining the content in line with the Sustainability Reporting Guidelines.

Feedback from the IRP will be discussed within the EEB and integrated into a second and final version of this report. The 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 INGO reporting, and promote enhanced accountability in their own operations.

The process for development of the 2013 report included input, comments and suggestions from the Board and Staff made throughout 2013 and in the first part of 2014 during several discussions on the organisational development of EEB. The process for the development of the 2014 report will be launched with an information session for Board members in order to raise awareness of the INGO

Charter and the EEB commitments. Information will also be shared with the full membership with the aim to share the values of the INGO Charter and encourage all member organisations to also embrace INGO values.

3.6 Boundary of the report

The focus of this report is the functioning of the EEB as an entity focussed on 'Brussels', co-ordinating and presenting the demands of its member organisations across Europe.

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 at EU level.

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

None of our member organisations have 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. For this reason, we will in 2014, ask all member associations to read the final version of this report and commit to supporting the Charter accountability commitments in the period ahead.

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

None

3.12 Table identifying the location of the Standard Disclosure in the report

This report follows the structure of the GRI NGO Sector Supplement 3.0, Level C 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. The Board includes a President, two Vice-Presidents and a Treasurer who are all elected by the General Assembly.

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 four teams: the Secretary General Team, the EU Policy Team, the Finance and Admin Team and the Membership and Communications Team.

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 2013 are listed in the response to NG05.

4.2 The chair of the highest governance body is not an executive officer. There is a clear division of responsibility 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 the Board is his/her employer.

The Board has an oversight role in relation to the management of the organization 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 Environment Commissioner or President of the 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. Examples of policy documents that were approved by the Board during 2013 included the EEB memoranda to the incoming Lithuanian and Greek Presidencies and the EEB position on the 7th Environmental Action Programme during the final stages of the negotiations. 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, Vice-President, Treasurer and Secretary General, which reports to each Board meeting. The Board also establishes time-limited task forces to work on specific issues.

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 EEB Board meetings and Annual General Meeting;
- Strengthening cooperation with 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?

There are **27** 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 Meeting, notably 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.

Apart from participating in the AGM discussions on issues such as the work programme and budget, individual member organizations may bring issues of specific concern directly to the attention of the General Assembly by tabling resolutions. Three such resolutions were adopted by the General Assembly in 2013 (on shale and fracking, on peat bogs and on Turkey and the Aarhus Convention).

Systematic evidence of meaningful engagement between internal stakeholders and the highest governance body is evidenced through the open and ongoing interaction between all levels of staff and the Secretary General throughout the year. In 2013 as each year, the annual Staff Retreat provided an opportunity for Staff and Management together to assess the strengths, weaknesses, opportunities and threats facing EEB, for staff to make recommendations 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 Staff and Management alike.

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 not compensated. 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. The salary scale for all staff is currently under review with the aim to strike a balance between public expectations of not-for-profit organisations' and the necessity to attract good personnel and senior staff.

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

We ensure independence of the highest governing body and the organisation itself from governments, political parties and the business sector by a thorough policy of vetting staff and governance representatives.

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

Procedures for the appointment, term limits, responsibilities and internal accountability support are laid out in an internal policy document to ensure the effectiveness of the highest governing body.

We do not have a formal process in place to evaluate its performance with a view to further improve the effectiveness of this body

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

No permanent charters other than the INGO Accountability Charter.

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 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 Board. In addition, the applicant must establish that it is not dependent on any commercial, industrial, or political influence or interest. The Board reaches an opinion and provides its opinion to the General Assembly. Based on the opinion 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. The General Assembly meets at least once a year at a date, time and place decided by the Board.

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, funders, academic institutions, peer organisations, networks, coalitions and strategic alliance members. The EEB communications team manages relations with Brussels based media.

The Secretary General interfaces with high-level stakeholders including EU Environmental Ministers and European Commissioners and is invited regularly to international conferences to address global stakeholder audiences. Policy teams outreach 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

Sustainable change will only be achieved if affected stakeholders develop ownership of the EEB process and work together to achieve results.

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 seventeen working groups. The working groups are established by the General Assembly and run by the relevant EEB Policy Officer 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 2013 the EEB organised 26 meetings of the Working Groups, one Annual General Assembly 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 before being transmitted to the Board and then the AGM. Thus the staff are mainly involved in the early part of the process and the EEB members in the latter part, having the final say through adopting it at the AGM. A similar process is involved in reviewing and reporting on the work programme.

There is clear evidence that stakeholder engagement processes have positively affected EEB decision-making or reshaped policies and procedures, such as staff influencing, often drafting in working group format, revised internal policies such as on reducing the environmental footprint of the Brussels operation.

The EEB Strategy 2010-2014 identified the 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 became partly operational in 2011, though it was not and is still not sufficiently used and needs a significant upgrade which is planned for late 2014 or early 2015. Probably it will be necessary to stop e-mailing documents in order to encourage members to use the system.

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. We do not utilise resources to engage stakeholders through surveys, focus groups or community panels.

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 a draft EEB work programme for the up-coming year; the circulation of information on EU policy developments to members; sending members an electronic newsletter every three weeks with information on up-coming EEB activities, and providing information on Commission consultations to members.

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 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 and will make this a priority in the current reporting period, taking into account the requirements of the Charter.

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 also used for a more thorough evaluation. At the level of the membership, the various working group meetings (see NG05) which occur typically 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 each year in which it evaluates its responses to EU policy developments in each area of its work programme, sets its own agenda for a future strategy on addressing EU policy in each of its work programme areas, examines the EEB's internal organisation, and lists the results and lessons learned for each of its work programmes. Highlights of successful policy achievements are reported in the Annual Report with a view to reach wider (including non policy) audiences.

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 members, through the Spring Alliance. A policy on non-discrimination, also covering gender, was drafted during 2013 (it was adopted in 2014).

NG05 – processes to formulate, communicate, implement, and change advocacy positions and public awareness campaigns

Advocacy and public awareness raising have become an increasingly important part of NGO work. At the same time public criticism in regard to NGO legitimacy and effectiveness is rising. Good accountability for advocacy is important for continued effectiveness. 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 work in partnership with member organisations.

Working Groups in 2013 gathered together experts on agriculture, air pollution, biodiversity, chemicals (REACH), Ecolabel, Ecological Product Policy, energy efficiency, Environmental Fiscal Reform, F-gas, industry (IED/ Seveso), Law-group (EEB + J&E), nanotechnology, natural resources / SCP, noise, soil, waste, water and mercury (Zero Mercury Campaign). An ad hoc working group established to follow the Rio+20 Conference continues to monitor the follow-up process (e.g. sustainable development goals). In addition, the EEB coordinates networks on 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 interacts with other NGOs.

The EEB has organised many events involving key stakeholders. The EEB has a range of means to ensure that it distributes information to its members and to stakeholders more generally. The EEB lists publications and press releases on its website. The EEB has created an online library of all its publications, found at <http://www.eeb.org/index.cfm/library/>. This 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 on the extranet or closed e-mail lists of the members of the working group. The contact details for the Policy Officer working at the EEB and who carries responsibility for 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.

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 acknowledges the value in working closely with other organisations in order to ensure that its position is consistent with that 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 the systems work 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 work with partners that meet high standards of accountability.

2. Financial Management

NG07 – Resource Allocation

The initial allocation of resources for 2013 was made through the 2012 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.

Expenditure (Euros) 2013

General Expenditure:	269,541
Personnel Costs:	1,314,740
Activities:	666,091
<u>Total Expenditure:</u>	2,250,372

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

In the year 2013, the EEB’s gross income was 2,229,182 Euros, consisting of:

EU Commission :	854,270 Euros
EU Member State Governments :	195,355 Euros
EEB Members:	137,200 Euros
Non-government Organisations:	180,817 Euros
Trusts and Foundations:	847,309 Euros
Other:	14,231 Euros
<u>TOTAL</u>	2,229,182 Euros

Top 5 donors overall

EU Commission – DG Environment (Core Grant) :830,700 Euros

Sigrid Trust Foundation: 220,564 Euros

European Climate Foundation: 206,715 Euros

Children’s Investment Fund Foundation
(via the Environmental Investigation Agency): 101,029 Euros

MAVA Foundation: 100,000 Euros

Top donors per sector

Top 5 donors from EU Commission: DG Environment

Top 5 donors Member State Governments: Germany, France, Denmark, Belgium and Ireland

Top 5 donors NGOs: Deutsche Umwelthilfe, Energy Saving Trust (EST),
Natural Resources Defense Council, Punto Sud

Top 5 donors from Trusts and Foundations: Sigrid Rausing Trust, European Climate Foundation,
Children’s Investment Fund Foundation, Mava and
Villum Foundation

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 have 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.

3. Environmental management

Climate change poses a fundamental and cross cutting threat to equitable and sustainable development. While we work on climate change policy, we do not yet have a detailed and comprehensive policy in place to limit our organisation's environmental impact but intend to address this in the near future.

EN16 – Total direct and indirect greenhouse gas emissions by weight

Not calculated.

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. However, 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. Furthermore, while being in rented premises imposes some limitations on what can be achieved, we consider that more can be done to reduce GHG emissions through e.g. energy efficient lights, appliances and IT equipment in offices. We will focus on these issues in 2014 and 2015 by setting up a Staff led working group with the aim to strengthen and make more explicit our policies and measures for assessing and limiting the organisation's ecological footprint (thus also covering the issues addressed in EN26 and EN 29).

EN26 Initiatives to mitigate environmental impacts of activities and services.

We do not measure the main environmental impacts of our programmes/projects/ activities, nor do we conduct an environmental assessment prior to carrying out activities, even though our current policies aim to minimise 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.

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. Home working policy (typically one day per week) reduces congestion and city emissions.

4. Human resource management

Having the right people with the necessary skill set, motivated and able 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 2013

Total staff: 21

Employees on full-time contract: 17 (16 permanent contracts, 1 temporary contract)

Employees on part-time contracts: 4 (2 permanent contracts, 2 temporary contracts)

Full-time volunteers/interns who work a minimum 30 hours a week: 8 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 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).

NGO9 Grievance mechanism for employees

We have human resource policies that conform to relevant standards and are in accordance with the values of our organisation in terms of employee and volunteer rights, health and safety at work. The primary mechanism for staff to raise grievances and get a response is directly with their supervisor.

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. We expect to enhance our in-house training capacity in 2014.

A survey of staff training needs will be undertaken and looked at together with results of staff performance reviews that have identified skills that require development for more effective individual, team and organisational performance. Feedback and post –training assessment will be undertaken, with follow up coaching, as required.

The average training time an employee will receive per year is hoped to increase from 2014 reaching 4 days per year by 2016.

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

Once a year (end of the year), all staff have a performance review with their supervisor, which includes the opportunity to discuss career development. Staff also has 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, 2013.

Category	Gender %	Nationality - number	Age %
Board	Female: 41% Male: 59%	27	Under 30: 0 30 – 50: 15 (56%) 50+: 12 (44%)
Senior Management	Female: 50% Male: 50%	4	Under 30: 0 30-50: 2 (50%) 50+: 2 (50%)
Team staff in Brussels Office	Female: 76% Male: 24%	10	Under 30:4 (24%) 30 -50: 11 (64%) 50+: 2 (12%)

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 disabilities.

5. Management of Impacts on Wider Society

SO1 Impact of activities on the wider community

The EEB is responsible through its work for a positive contribution to society. We manage our impacts, both negative and positive, on the wider societies 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?

Corruption is a huge and often underestimated risk substantially undermining NGO impact and the social fabric of communities. In order to prevent the risk of corruption, in late 2013 the EEB Secretary General drafted an anti-corruption policy in consultation with the staff, for adoption by the Board (the policy was adopted by the Board in 2014).

SO4 Actions taken in response of incidents of corruption.

We do not record or publish 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 (e.g. in August 2013 by a columnist in the UK’s Daily Telegraph newspaper) 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 our 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 2013 (where the core grant represented 37.2% as compared with 39.6% in 2011), with a bigger decline in the level of dependence expected in 2014.

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