

# Accountable Now

GLOBAL STANDARDS LOCAL TRUST



## **European Environmental Bureau Independent Review Panel Feedback**

**Accountability Report 2015  
Review Round April 2017**



# European Environmental Bureau

## Feedback from the Independent Review Panel

### Review Round April 2017

1 June 2017

Dear Jeremy Wates,

Thank you for submitting your Accountability Report. We, the Independent Review Panel of Accountable Now, appreciate your efforts to continuously strengthen accountability to communities, local partners, supporters, staff, donors, or other key constituencies. Our key focus is on accountability to those you serve. It is against this background that we critically discussed your report and came to the individual assessment below. Before we share this with you, however, we want to highlight a few issues of concern that we found throughout most of the nine reports assessed in the last review round.

### Closing the feedback loop with stakeholders (NGO2, NGO9)

A [recent study](#) on 40 international civil society organisations' (CSOs') accountability practices - conducted by the *direct impact group* on behalf of Accountable Now - revealed that only three out of these 40 CSOs responded with an appropriate answer to a complaint test within three weeks.

This is alarming. All Members of Accountable Now should have a fully functioning feedback mechanisms in place. However, when checking your reports we found a consistent lack of reporting filed complaints per type, quantity, and region as well as a total lack of information on how they were resolved. We believe this is not an acceptable level of accountability. CSOs should not only have a mechanism in place but should first be capturing complaints with the appropriate level of detail and then monitoring their resolution and agreeing what actions need to be taken to ensure the same issues do not arise.

[Feedback Labs](#), with whom Accountable Now collaborated on the [People-Powered Accountability project](#), also serve as a valuable source of information on how to close feedback loops.

### Collaboration with partners, communities and networks (NGO6, EC7 & SO1)

As part of the [10 Accountability Commitments](#), Accountable Now Members commit to working in genuine partnership with local communities and partners. With increased globalisation of information, more empowered citizens engage and civic space is challenged, it becomes ever more important to help local communities and partners to thrive. However, we found that coordination with local communities is still an overall weakness area among the Accountability Reports we received. Some



“common” ICSO practices can have intended or unintended consequences on local communities. We would thus like to particularly highlight a lack of contributions to building local capacity and resources. Do you take into account local market conditions and think about working alongside local organisations building their capacity? We suggest that ICSOs should start to consider their impact on the sustainability and independence of local civil society in all their work (such as planning, budgeting, economic impact, etc.).

## Adding to what people do to improve their lives

(NGO3)

To state the obvious, impact measurement is important. However, many evaluations mentioned in received Accountability Reports focus on collecting relatively large amounts of data on people reached, however, this does not tell us much about the improvement in their lives. Moreover, we should critically ask ourselves: What is the ICSO’s credit in this improvement and what positive impact is actually due to the people and beneficiaries themselves?

While we are of course aware that resources are limited, there is clearly no substitute for a robust and honest impact evaluation of our programmes and activities.

## Organisation-specific feedback to the European Environmental Bureau:

The European Environmental Bureau’s (EEB) fourth Accountability Report is quite comprehensive and is a slight improvement in comparison to previous reports. However, the Panel is disappointed that it largely includes very similar answers with sometimes the same exact language as in the 2014 Accountability Report. In terms of **institutional commitment**, the Panel encourages EEB to highlight new content (in particular new measures relating to accountability and governance) rather than simply duplicating previous report. For example, the opening statement by Jeremy Wates, EEB’s Secretary General, is copied from their Accountability Report 2014.

EEB has demonstrated **improvements** in the following areas: Involvement of affected stakeholder groups (NGO1) and advocacy positions and public awareness campaigns (NGO5). Following up on earlier requests by the Panel, EEB provided more information on: Governance structure (4.1) and managing your impact on local communities (SO1).

Main **weaknesses** are: Basis for reporting / Raising accountability among network (3.8), compensation for members of highest governance body (4.5), mechanisms for feedback and complaints (NGO2), programme monitoring, evaluation and learning (NGO3) and greenhouse gas emissions of operations (EN16) and evident seriousness in regard to acting on weaknesses pointed out in earlier reports.



EEB declares their Membership in Accountable Now and publishes the new **Accountable Now logo** along. It added their 2014 Accountability Report to their website [here](#). The Panel looks forward to having the 2015 Accountability Report added to EEB's website, too. EEB also mentions their Accountable Now Membership in their [Annual Report 2015 \(page 23\)](#).

Since this is the fourth Accountability Report, EEB could be eligible for a two-year cycle reporting interval. Nevertheless, the Panel has decided that EEB will continue on an annual reporting cycle because the organisation showed little progress with regards to their improvement areas as outlined in the 2014 report. If these issues are addressed in the next Accountably Report, EEB would be moved to a two-year cycle reporting interval. Generally, the Panel wonders about EEB's institutional commitment because of the limited progress on matters flagged previously by the Panel indicates this is a low priority. The Panel does not suggest that there are serious governance deficiencies but strongly demands speedy progress on the identified weaknesses.

Our intention is that this feedback letter, and any response you may wish to provide, is made publicly available on the Accountable Now website along with your report - as it is the case with all previously reviewed reports. However, should there be errors of fact in the feedback above or in the note below; we would of course wish to correct these before publication. Please share any comments or amendments by 1 July 2017.

If you have any other feedback or comments on our work, please share them with us by sending them to the Accountable Now Secretariat.

Yours sincerely,

Mihir Bhatt

Rhonda Chapman

John Clark

Louise James

Jane Kiragu

Nora Lester Murad

Michael Roeskau

Saroeun Soeung



# Cover Note on the European Environmental Bureau's Accountability Report 2015

Review Round April 2017

PROFILE DISCLOSURES	
I. Strategy and Analysis	
1.1	<p><b>Statement from the most senior decision-maker</b></p> <p><i>Partially addressed</i></p> <p>The opening statement by Jeremy Wates, EEB's Secretary General, is copied from the 2014 Accountability Report. Although the last report was submitted in June 2016, the Panel would have expected a new opening statement that outlines the progress EEB made during 2015. The Panel appreciates sharing a link to the <a href="#">Medium Term Strategy 2016-2019</a> that was subject to lengthy consultations in 2015 with staff, Board and member organisations.</p>
II. Organisational Profile	
2.1 – 2.2	<p><b>Name of organisation / Primary activities</b></p> <p><i>Fully addressed</i></p>
2.3	<p><b>Operational structure including national offices</b></p> <p><i>Fully addressed</i></p> <p>The EEB, as a European federation of environmental CSOs, includes full members, associate members and honorary members. EEB's General Assembly, the highest decision making body, is composed of their members with voting rights only accorded to full members. The Assembly elects a <a href="#">Board</a> from each Member State where the EEB has one or more full member organisations. In 2015, the statutes were amended to provide additional seats on the Board for up to ten representatives of European networks. The Board appoints a Secretary General who is the chief executive of the organisation and who heads five teams based in Brussels. The EEB also has working groups comprised of member</p>



	organisations to exchange information between the EEB and its members and plan concrete actions.
2.4 – 2.8	<b>Headquarter location / Number of countries / Nature of ownership / Target audience / Scale of organisation</b> <i>Fully addressed</i>
2.9	<b>Significant changes</b> <i>Fully addressed</i> Four of the current Board Members are representatives of networks and were elected based on the 2015 amendments to the EEB Statutes.
2.10	<b>Awards received</b> <i>Fully addressed</i>
<b>III. Report Parameters</b>	
3.1 – 3.4	<b>Reporting period / Date of most recent report / Reporting Cycle / Contact person</b> <i>Fully addressed</i>
3.5	<b>Reporting process</b> <i>Fully addressed</i> EEB says it has opened dialogue with its members on their Accountability Report, however it is not apparent that the 2014 Accountability Report and Panel feedback were even shared with members. The Panel unfortunately could not locate EEB's Accountability Report 2015 on their <a href="#">accountability page</a> . As requested in last year's feedback, the Panel is interested to know the feedback EEB received on the report. This will help the Panel understand how valued the reports are by EEB members, which can subsequently point to potential improvements in the reporting processes.  In their internal newsletter in mid-March, EEB informed its members on Accountable Now membership and invited members to read the EEB reports as well as to check out Accountable Now's website.
3.6 – 3.7	<b>Report boundary / Specific limitations</b> <i>Fully addressed</i> The report covers EEB as a network and not the activities of their member organisations.



3.8	<p><b>Basis for reporting</b></p> <p><i>Addressed</i></p> <p>EEB cannot and is not mandated to ensure quality assurance of its members' compliance with the Accountability Commitments but continues to endorse voluntary commitment amongst their membership. The minimum viable requirement from the Panel's point of view, as outlined in the last feedback letter, is to have a functioning complaints handling mechanism through which external actors can submit complaints concerning members of EEB regarding activities conducted in EEB's name. This can be part of the general mechanism for feedback and complaints under NGO2.</p>
3.10 – 3.12	<p><b>Changes in reporting parameters / Reference table</b></p> <p><i>Fully addressed</i></p>
<p><b>IV. Mission, Values, Governance, and Stakeholder Engagement</b></p>	
4.1	<p><b>Governance structure</b></p> <p><i>Fully addressed</i></p> <p>The General Assembly is the highest governance body and elects the Board. EEB followed up on the Panel's request last year and highlighted that Board members are elected for three-year terms without limits on re-election. The Board delegates its financial oversight to a Management Committee that brings together the President, the Treasurer and one or more other Board members. The Board establishes time-bound task forces to work on specific issues but none was formed in 2015. The Panel continues to be surprised that there is no further delegation of oversight responsibility by the Board, which currently has 38 members and would be regarded by most CSOs as too unwieldy.</p>
4.2 - 4.3	<p><b>Division of power between the governance body and management / Independence of Board Directors</b></p> <p><i>Fully addressed</i></p> <p>EEB ensures division of power by two means: the Chair of the EEB Board is not Executive and EEB Secretary General does not sit on the Board. The Board supervises the Secretary General and his staff and has the power to appoint and to dismiss the</p>



	Secretary General. In 2015, the Board has 37 non-executive members.
4.4	<p><b>Feedback from internal stakeholders</b></p> <p><i>Fully addressed</i></p> <p>Member organisations have the right to propose issues at the General Assembly by tabling resolutions. Although, staff does not have the mandate to attend the General Assembly, some members of staff attend to provide technical support or policy input to the discussions as needed. In 2015, staff had a two-day retreat in which they discussed relevant issues including the Accountability Commitments.</p>
4.5	<p><b>Compensation for members of highest governance body</b></p> <p><i>Partially addressed</i></p> <p>Members of the General Assembly and Board are generally not compensated for their time but are only reimbursed for expenses such as travel or accommodation. €10,000 was used in 2015 to cover expenses related to the increased activities of EEB' President. The Panel would like to know if there is policy on compensation of Board Members, and if so does the policy allow for exceptions, as has been the case in this reporting period? More generally, the Panel is interested to understand how Board compensation is treated under Belgian NGO law?</p> <p>The review of the salary scale for all staff is still ongoing and is linked to a broader review process being undertaken by a group of Brussels-based CSOs. The Panel looks forward to receiving EEB's reviewed salary scale including that of senior management. The Panel further refers EEB to <a href="#">World Vision's Interim Accountability Report 2015</a> (page 8) and to the <a href="#">Pay section</a> on Amnesty International's website, which both transparently disclose the compensation for their senior managers.</p>
4.6	<p><b>Conflicts of interests</b></p> <p><i>Fully addressed</i></p> <p>As designated by the EEB Statutes (Art. 5.1) and as part of their membership application process, all EEB full members are screened to ensure they are 'independent of any commercial, industrial or party political influence or interest'. Also, concerns regarding conflicts of interests can be raised by the Board,</p>





	Secretary General or any member during the General Assembly.
4.10	<p><b>Process to support highest governance body's own performance</b></p> <p><i>Partially addressed</i></p> <p>EEB's Statutes and the Standing Orders outline the main procedures governing the functioning of the General Assembly. But there is no formal process to evaluate the performance of either the General Assembly or the Board. Because of the increase in the Board's size, there has been an ongoing discussion about the functioning of the Board but no details on these discussions are provided in the report. The Panel would appreciate the outcome of these discussions and any practical steps that have been taken. Some Accountable Now Members show <a href="#">good practice</a> (pages 32-33) in this regard: the Boards of both Educo and Plan International carry out self-evaluations while the Chair of Greenpeace International's Board of Directors coordinates a 360 degree evaluation of the performance of the Board.</p>
4.12	<p><b>Social charters, principles or other initiatives to which the organisation subscribes</b></p> <p><i>Fully addressed</i></p> <p>EEB does not subscribe to other charters.</p>
4.14 - 4.15	<p><b>List of stakeholders / Basis for identification of stakeholders</b></p> <p><i>Fully addressed</i></p> <p>EEB's internal stakeholders are their Members. Other stakeholders 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. While the Panel understands the primacy of EEB Members given its nature as a network, the Panel encourages EEB to prioritise other stakeholders to which they hold themselves accountable - who are typically the most affected by EEB's work.</p>



## PERFORMANCE INDICATORS

### I. Programme Effectiveness

NGO1	<p><b><i>Involvement of affected stakeholder groups</i></b></p> <p><i>Fully addressed</i></p> <p>EEB provides a comprehensive overview on how their members and staff are included in the planning, implementation, monitoring and evaluation of their activities. The General Assembly has established 17 working groups which have played an instrumental role in policy formulation with ongoing input and support from staff. The Panel praises EEB for starting to develop their Extranet facility (due to finish in 2017) which will enhance external and internal stakeholder engagement and communications. Different online (surveys, invitation to comment on work plans) and offline (meetings, workshops, conferences) communication channels are used to foster communication with members. The Panel commends EEB for progress made in this area and looks forward to more progress.</p>
NGO2	<p><b><i>Mechanisms for feedback and complaints</i></b></p> <p><i>Partially addressed</i></p> <p>This continues to be a continuing <b>weakness area</b> and the Panel finds it alarming since this was envisaged to be addressed in 2016 (based on the 2014 Accountability Report) but in this report, it was rescheduled to 2017. In 2014 report, EEB committed that it “will make this a priority in the current reporting period, taking into account the requirements of the Charter”. In this report, EEB “has not yet established and publicised a more formal complaints mechanism though the afore-mentioned anti-corruption policy provides some elements of such a mechanism.” As outlined under 3.8 (Basis for Reporting), the Panel expects the complaints policy and processes to address complaints regarding EEB itself or members activities conducted in the name of EEB. The Panel strongly flags that having a functional feedback and complaints mechanism is a minimum requirement of Accountable Now membership. The Panel refers EEB to <a href="#">good practice</a> (pages 51-53) from Educo, Islamic Relief and Sightsavers.</p>



NGO3	<p><b>Programme monitoring, evaluation and learning</b></p> <p><i>Partially addressed</i></p> <p>EEB provides the same answer to that provided in the 2014 Accountability Report, using almost the same language. Monitoring and evaluation efforts take place at staff and membership levels via meetings and reports. EEB's <a href="#">Medium Term Strategy 2016-2019</a> only includes activities without reference to indicators. In addition to internal monitoring, the Panel would be interested to know if EEB undertakes external evaluation of their projects and if so how they use the findings of these evaluations. The Panel refers EEB to <a href="#">good practice</a> (pages 54-63) from several Accountable Now Members.</p>
NGO4	<p><b>Gender and diversity</b></p> <p><i>Addressed</i></p> <p>EEB has an aspirational target of 50% women speakers/moderators/ panellists at EEB events. However, in the 2015 Annual Conference male speakers were double the females (17 and 8 respectively) as several female invitees could not make it to the conference. Gender division on EEB's Board and staff composition is provided under LA12. The Panel praises EEB for electing representatives of umbrella groups representing women and youth for their Board in 2015. The Panel also refers EEB to <a href="#">good practice</a> (pages 64-68) in this area from Plan International.</p>
NGO5	<p><b>Advocacy positions and public awareness campaigns</b></p> <p><i>Fully addressed</i></p> <p>Through their ad-hoc Working Groups (17 during the reporting period), EEB ensures their member organisations are included in the formulation, development and delivery of policy positions. EEB uses several online channels to communicate their policy positions. The Panel commends EEB for following up on their earlier commitment by developing a new strategic approach for external and internal communication and providing a capacity building workshop on the SDGs for their members in connection to their AGM 2015. Beyond their members, the EEB interacts with other relevant actors via their coordination of networks on mercury, the Aarhus Convention in the pan-European region and on OECD.</p>
NGO6	<p><b>Coordination with other actors</b></p> <p><i>Addressed</i></p> <p>EEB refers to their collaboration with the Green 10 and with the Spring Alliance. Through their publications, press releases and</p>



	<p>conferences, EEB partners with like-minded organisations. The 'Nature Alert' campaign is a clear example on how they coordinated with three members of the Green 10. While this is a positive example, the Panel is interested to know how EEB systematically manages their coordination. Does EEB, for example, maintain a comprehensive stakeholder analysis to inform potential partnerships?</p>
<h2>II. Financial Management</h2>	
NGO7	<p><b>Resource allocation</b></p> <p><i>Partially addressed</i></p> <p>Initial allocation of resources for 2015 was made through the 2014 AGM's adoption of the Work Programme and Budget. Based on incoming funding, an evolving 'working budget' was subsequently developed under the authority of the Secretary General and the oversight of the Management Committee. The Panel appreciates that Annual Accounts are audited by the EEB Auditor and that a statutory auditor's report is presented to the General Assembly at the AGM. The Panel reiterates that it is mandatory for EEB to share a link to the auditor's report and refers EEB to <a href="#">good practice</a> (pages 80-85) from ARTICLE 19, CBM, Educo and Transparency International.</p>
NGO8	<p><b>Sources of Funding</b></p> <p><i>Fully addressed</i></p> <p>The top five donors are: EU Commission, MAVA Foundation, European Climate Foundation, Villum Foundation and the Food and Agriculture Organization of the UN.</p>
<h2>III. Environmental Management</h2>	
EN16	<p><b>Greenhouse gas emissions of operations</b></p> <p><i>Partially addressed</i></p> <p>An EEB staff working group called 'Greening the EEB' aims to strengthen internal policies and measures for assessing and limiting the EEB's ecological footprint. Progress of the working group is monitored during staff meetings. However the fact that the report uses the same language as the 2014 report implies a lack of progress. Also, the commitment to put the "greening" guidelines, once completed, on EEB's website has been dropped. In 2015, EEB started to require its staff to report on their greenhouse gas emissions when travelling. The Panel looks forward to more</p>



	progress in this regard including benchmarks since this area is of utmost importance for an environmental CSO.
EN18	<p><b>Initiatives to reduce emissions of operations</b></p> <p><i>Addressed</i></p> <p>EEB has in-place a number of initiatives to reduce emissions for e.g. from energy usage and waste sorting. They also serve bio food and contract green suppliers whenever possible and increase use of web-conferencing. A system was established in 2014 to monitor printing volume but no benchmarks are set so far. The Panel looks for more progress in this regard.</p> <p>While EN29 is not part of the official Panel assessment, the EEB is commended for having a shared bike policy in place to reduce CO<sub>2</sub> emissions.</p>
EN26	<p><b>Initiatives to mitigate environmental impact of activities and services</b></p> <p><i>Addressed</i></p> <p>The Panel appreciates that EEB is starting to measure some of their environmental impacts. The <a href="#">EEB Environmental and Sustainability policy statement</a> was finalised in 2016 and not in 2015 as planned. The Panel looks forward to more information on the implementation of the policy in the next report.</p>
<b>IV. Human Resource Management</b>	
LA1	<p><b>Size and composition of workforce</b></p> <p><i>Fully addressed</i></p>
EC7	<p><b>Procedure for local hiring</b></p> <p><i>Fully addressed</i></p>
LA10	<p><b>Workforce training</b></p> <p><i>Partially addressed</i></p> <p>No formal training opportunities were offered in 2015 due to changes in staff and limited financial capacity. However, informal training opportunities were offered during thematic lunches (facilitated by EEB Policy Officers) and in the annual staff retreat. The Panel flags the importance of workforce training and refers EEB to <a href="#">good practice</a> (pages 100-105) from Accountable Now Members including BRAC Bangladesh which devotes more than 3% of its total budget to staff training.</p>



LA12	<p><b>Global talent management</b></p> <p><i>Addressed</i></p> <p>Once every year, all staff have a performance review with their supervisor. Did indeed all staff members receive a performance review in 2015? And is there evidence for this process to work well in practice?</p>
LA13	<p><b>Diversity of workforce and governance bodies</b></p> <p><i>Fully addressed</i></p> <p>EEB maintains diversity in terms of gender, nationality and age within the three main groups: Board members, senior management and other staff. None of these groups is known to have a disability or comes from an ethnic group.</p>
NGO9	<p><b>Mechanisms to raise grievances</b></p> <p><i>Addressed</i></p> <p>EEB's human resource policies conform to relevant standards under Belgian law. The primary mechanisms for staff to raise grievances and get a response is directly with their supervisor. The Panel would appreciate more specific evidence such as how many staff complaints were received and how they were resolved. Unfortunately, EEB did not complete the review of their complaints mechanism as part of their Anti-Corruption Policy as one of the responsible Board members left. The Panel encourages speedy progress in this regard. Also, the Panel refers EEB to <a href="#">good practice</a> (pages 113-115) from Educo and Transparency International.</p>
<p><b>V. Responsible Management of Impacts on Society</b></p>	
SO1	<p><b>Managing your impact on local communities</b></p> <p><i>Fully addressed</i></p> <p>The Panel appreciates EEB's elaboration on their positive impact by referring to their work on the National Emission Ceilings Directive which would contribute to the avoidance of thousands of pollution-related deaths per year in the EU. The Panel looks forward to similar positive examples in next reports.</p>
SO3	<p><b>Anti-corruption practices</b></p> <p><i>Partially addressed</i></p> <p>EEB refers to their adopted anti-corruption policy, however this policy is not publicly available on EEB's website and therefore its purpose, which includes setting out a general complaints process</p>



	<p>as well as identifying and addressing instances of corruption, is almost impossible to attain. The Panel is interested in how the policy is implemented in practice and how staff awareness on the policy is maintained. The Panel refers EEB to good practice from <a href="#">Plan International's Accountability Report 2013-14</a> (page 38) who invests in training their staff on anti-corruption policies. Also, the Panel refers EEB to Jeremy Sandbrook's <a href="#">blog post</a> which outlines the significant role of leadership in fighting corruption in the sector.</p>
SO4	<p><b>Actions taken in response of corruption incidents</b></p> <p><i>Fully addressed</i></p> <p>EEB reports that no incidents of corruption and fraud were recorded or published in 2015.</p>
<p><b>VI. Ethical Fundraising</b></p>	
PR6	<p><b>Ethical fundraising and marketing communications</b></p> <p><i>Fully addressed</i></p> <p>EEB does not accept donations from companies that are even marginally involved in the following industries: (i) weapon; (ii) child labour; (iii) tobacco; (iv) pornography; (v) nuclear and mining of uranium in addition to companies that violate human rights. EEB works to ensure that their dependence on core funding from the European Commission (reduced to 27.6% if compared to 39.6% in 2011) does not compromise its independence. EEB criticises the Commission publicly and sometimes brings them to court. Private sector funding guidelines were not reviewed as planned due to efforts to increase foundation funding.</p>