

Brussels, 28 July 2017

Dear members of the Accountable Now Independent Review Panel,

Thank you for your thorough and constructive feedback on the European Environmental Bureau's 2015 accountability report.

With this letter, we wish to comment on, clarify and/or correct some of your points.

To start with, we would like to inform you that since May 2017 we have a new website. The address is still the same ([www.eeb.org](http://www.eeb.org)), but some of the links you refer to in your feedback may no longer be working/redirected properly. We have inserted the new, correct hyperlinks in our comments below.

### **Comments on your Improvement Analysis letter**

#### *Seriousness in regard to acting on weaknesses pointed out in earlier reports*

While it is true that we have not managed to make progress in the speed that we would have hoped for, we believe that it is not always correct to draw a parallel between the use of similar language in our previous report (the fact that our 2015 report 'largely includes very similar answers with sometimes the same exact language as in the 2014 Accountability Report') and lack of commitment. If the situation is in certain respects the same as it is described in the previous report, we see no problem in using the same text to describe it and no virtue in artificially modifying the language to make it original, like a student trying to avoid a charge of plagiarism. The point is to have an accurate description of the situation for the year in question.

As a case in point, it is true that the majority of our opening statement is similar to that made in 2014 (our definition of accountability has not changed), but not that it is simply copied from our previous report – we introduced new content highlighting changes in 2015 and progress made on our Medium Term Strategy.

While we have tried to introduce some cross-references, the reporting form itself remains very repetitive. We very much look forward to an improved, leaner Accountable Now reporting template that discourages repetition that we have understood will be introduced next year.

#### *Basis for reporting / Raising accountability among network (3.8)*

##### */Mechanisms for feedback and complaints (NGO2)*

The EEB is aware of the urgency to advance on its commitment to review its complaints handling mechanisms and will make it a priority to finalize the review and publicize the external elements of the mechanism by the end of 2017.

#### *Programme monitoring, evaluation and learning (NGO3)*

Our [Medium Term Strategy](#) is available on the [About page](#) on our new website. While we agree that there is room for improvement in the level of detail of our indicators, it is not correct to say that it 'only includes activities without reference to indicators'. Several of our overarching policy goals include indicators that can and will be used to measure success, e.g. percentages and expected policy outcomes listed in the introductory bullet points in each chapter as well as under the headline 'What the EEB wants to achieve and do' which is repeated in the various sections. An evaluation of our Medium Term Strategy is foreseen for our 2018 Annual Events, where we are also planning to use participatory methods to start to draft the post-2019 strategy together with our members. Concerning external evaluation of our projects, it is not foreseen for all projects due to budget constraints, but we carry out and participate in external evaluations whenever feasible. An example from 2015 is the evaluation of a joint project that the EEB participated in together with five other NGO's on the reform of the European Union's Common Agricultural Policy (CAP). The evaluation was financed by the funder, the MAVA Foundation. The findings were thoroughly discussed in a workshop with all project partners and have since been taken into account when developing concepts for similar projects.

#### *Greenhouse gas emissions of operations (EN16)*

Our commitment to put our guidelines online has not been dropped. Our [Environmental and Sustainability policy statement](#) is available on the [About page](#) on our new website.

### **Additional comments on your feedback letter**

#### *3.5 Reporting process*

Due to the unfortunate delay of submission of our 2014 report, it is correct that we did not share it with our members. Instead, we chose to share the 2015 report via our weekly newsletter to members. [The 2015 report](#) is available on the [About page](#) our new website. Unfortunately, we did not receive any specific feedback from our members on the report.

#### *4.1 Governance structure*

Regarding the Panel's surprise that 'there is no further delegation of oversight responsibility by the Board' beyond the delegation to the Management Committee and various task forces, and the implication that there should be further delegation, this is exactly why, as mentioned in the report, discussions about how to deal with the increased size of the Board continued in 2015, and in 2016 an Executive Committee consisting of the President and Vice-Presidents was set up (more info will follow in our 2016 Accountability Report).

#### *4.5. Compensation for members of highest governance body*

Our policy on compensation of Board members is the same as that for compensation of members of the General Assembly, namely that they are generally not compensated for their time but are reimbursed for travel and accommodation expenses to attend EEB events. In addition to this policy, 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 of 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 provision is adopted by the General Assembly as part of the adoption of the annual budget. The above arrangement is consistent with Belgian NGO law, which allows for both paid and unpaid Board members, according to the decision of the General Assembly.

#### *4.10 Process to support highest governance body's own performance*

As mentioned in the report, discussions about how to deal with the increased size of the Board continued in 2015, and in 2016 an Executive Committee consisting of the President and Vice-Presidents was set up (more info will follow in our 2016 Accountability Report).

#### *NG06 Coordination with other actors*

In this paragraph you are referring to our collaborations with like-minded organisations and that '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?' Beyond a thorough understanding of how EU decision-making processes work which is usually shared by those we collaborate with, stakeholder analysis for a given initiative needs to be done on a case-by-case basis, so there is no single stakeholder analysis covering all possible policy areas and campaigns. The extent to which there is a formalized process for developing a stakeholder analysis for a given campaign or initiative varies.

#### *NG07 Resource allocation*

We were not aware of any obligation to share a link to our auditor's report but have no problem doing so. Our 2015 Auditor's report has been uploaded to our website and can be found on the [About page](#), direct link [here](#).

#### *LA12 Global talent management*

Almost all staff members received a performance review in 2015 (two did not, due to specific circumstances). The process is generally considered to work well. However, in order to get more systematic user feedback, the EEB is currently reviewing the template used for the reviews and will add questions to evaluate the process itself in the future.

#### *NG09 Mechanisms to raise grievances*

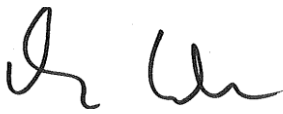
As regards the Panel's request for 'more specific evidence such as how many staff complaints were received and how they were resolved', the EEB does not have a system for defining at what point a communication should be classified as a complaint that merits being registered in a way that would enable the collection of statistics on complaints. The lack of such a system does not however mean that complaints have not been handled fairly and correctly. This issue will be addressed in the context of developing the complaints mechanism.

#### *SO3 Anti-corruption practices*

We had originally intended to further develop our adopted anti-corruption policy before making it available to the public. However, since this has unfortunately taken longer than planned, we have now uploaded the [policy adopted in 2014](#) on the [About page](#) on our website with a couple of placeholders

indicating the parts that need follow-up work. Concerning staff awareness, we have a standing item about accountability and internal policies on the agenda of our monthly staff meetings to ensure that staff, and especially newcomers, are kept up to date about internal policy developments and where to find the relevant documents on the internal server and online. Since the adoption of the policy, we (fortunately) did not have to deal with the kind of situations that would trigger the reactive aspects of the policy.

With kind regards,

A handwritten signature in black ink, appearing to be "J. Wates", written in a cursive style.

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Jeremy Wates  
EEB Secretary General