



**Accountable  
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GLOBAL STANDARDS LOCAL TRUST



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

**Accountability Report 2016  
Review Round February 2019**



# European Environmental Bureau Feedback from the Independent Review Panel

## Review Round February 2019

12 March 2019

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.

The European Environmental Bureau's (EEB) fifth Accountability Report demonstrates some improvements from previous reports. **Institutional commitment** to accountability is contained in the opening statement by Jeremy Wates, EEB's Secretary General, which highlights some key developments on accountability in 2016.

The EEB has demonstrated **improvements** or provided more information on the following areas: statement from the most senior decision-maker (1.1), involvement of affected stakeholder groups (NGO1), complaints mechanisms (NGO2), anti-corruption practices (SO3), and environmental monitoring (EN16).

Key **areas for improvement** are: compensation for members of highest governance body (4.5), performance of the highest governing body (4.10), evaluation and learning (NGO3), workforce training (LA10) and mechanisms for internal stakeholders to raise grievances (NGO9).

Given the progress made, particularly on the complaints mechanism which is now available online, the Panel would like to **move EEB to the biennial reporting cycle**. This means that EEB's next report should be an interim report focusing on the Panel's improvement analysis. However, given the fact that the next report will cover both 2017 and 2018, we request that the report provide a detailed update on any accountability related developments from these years, and also provide information on the implementation of EEB's new complaints mechanism (NGO2), environmental policy (EN26), and performance reviews (LA12).

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 12 April 2019.

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,

Accountable Now's Independent Review Panel





# The European Environmental Bureau's Accountability Report 2016

Review Round February 2019

## PROFILE DISCLOSURES

### I. Strategy and Analysis

1.1	<p><b>Statement from the most senior decision-maker</b></p> <p><i>Fully addressed</i></p> <p>The opening statement from the EEB's Secretary General Jeremy Wates notes the importance of establishing the integrity of CSOs in the current political climate, and identifies Accountable Now membership as a means to strive for continuous improvement.</p> <p>The statement explains what accountability means to the EEB – and focuses on transparency and reporting to members as well as the public, and engaging members to ensure their views are reflected in activities.</p> <p>Some key developments relating to accountability are also outlined, including a new <a href="#">environmental and sustainability policy</a> and changes to its governance structure. The need to review the EEB's complaints handling mechanism is also flagged, and the Panel notes (positively) that the <a href="#">policy</a> and dedicated complaints email address were uploaded to the EEB website in 2017.</p> <p>Overall, the statement touches on general as well as topical issues and developments, and provides a helpful snapshot of accountability at the EEB.</p>
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### II. Organisational Profile

2.1 – 2.3	<p><b>Name of organisation / Primary activities / Operational structure including national offices</b></p> <p><i>Fully addressed</i></p> <p>The EEB's vision, mission, structure, main activities and methods of working are explained.</p> <p>In terms of governance structure, a key change was the establishment of the Executive Committee (ExCom). The ExCom consists of the EEB's President and Vice Presidents, and is involved in the preparation and</p>
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	follow-up of Board discussions and decisions, as well as the annual appraisal of the Secretary General.
2.4 – 2.6	<b>Headquarter location / Number of countries / Nature of ownership</b> <i>Fully addressed</i>
2.7	<b>Target audience</b> <i>Fully addressed</i>  The EEB's primary target stakeholders are EU institutions and member states in their capacities of shaping and implementing EU policy and legislation. Other institutions or stakeholders who may influence these primary stakeholders are also targeted by the EEB, and the EEB's own members are also seen as key stakeholders.
2.8	<b>Scale of organisation</b> <i>Fully addressed</i>  Data on number of staff and finances for 2016 is provided. The key types of activities the EEB undertakes are listed, and more information is available on their <a href="#">website</a> .
2.9	<b>Significant changes</b> <i>Fully addressed</i>  In 2016 a new membership category was created for affiliate members, and a decision was taken to allow members to opt for associate or affiliate membership even if they fulfil criteria for full membership. The affiliate category was introduced for those who are not eligible or interested in higher membership categories.  Another change was the establishment of an Executive Committee as mentioned under 2.3 above.
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>Addressed</i>  As in previous years, the EEB's own members and their representatives are seen as the main target audience for the accountability report. It is stated



	<p>that the report, once finalised, will be shared with members and a dialogue will be open to encourage them to engage in Accountable Now's commitments.</p> <p>The Panel has previously requested some examples of feedback the EEB received on its accountability reports, or any key takeaways from discussions with their members around accountability. In future reports, the Panel would like to see examples of how the EEB is actively promoting the report to its members and other stakeholders (besides uploading it on the EEB website) and more information about how staff/members are involved in the reporting process (e.g. through discussions on certain sections, or by reviewing and contributing to a first draft etc). What feedback (if any) on the report or the Panel's feedback has been received from members?</p>
<p>3.6 – 3.8</p>	<p><b>Report boundary / Specific limitations / Basis for reporting on national entities</b></p> <p><i>Fully addressed</i></p> <p>The report focuses on EEB as a federation, covering key aspects of governance, but does not cover the activities of its member organisations (or affiliates) except for where they are relevant to EEB's functioning as a federation.</p> <p>None of the member organisations have provided financial or other data for this accountability report, as the EEB Secretariat has no systematic assurance that national and regional entities comply with the accountability commitments.</p> <p>While the EEB Secretariat does not have a mandate to oversee compliance with the commitments, it does bring its endorsement of the accountability commitments to the attention of its members and has indirectly encouraged them to comply. The Panel would like to know what steps the EEB secretariat has taken to do this e.g. provision of guidance or good practice on certain issues, and whether any of its members have shared how they are implementing any of the provisions of their accountability commitments or provided a commitment regarding their compliance with these moving ahead.</p>
<p>3.10 – 3.12</p>	<p><b>Changes in reporting parameters / Reference table</b></p> <p><i>Fully addressed</i></p>



IV. Mission, Values, Governance, and Stakeholder Engagement	
4.1	<p><b>Governance structure</b></p> <p><i>Fully addressed</i></p> <p>A detailed explanation of the governance structure is provided. The General Assembly is the highest governance body and elects the EEB Board members, as well as the President, two Vice-Presidents, and Board Treasurer. Board members are elected for three-year terms without limits on re-election. An Executive Committee consisting of the President and Vice-Presidents prepares Board discussions and decisions, follows up on Board decisions, makes decisions as mandated by the Board, and evaluates the Secretary General's performance.</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 responsibilities by two means: the Chair of the EEB Board is not Executive and EEB's Secretary General does not sit on the Board. The Board through its ExCom and a Management Committee supervises the Secretary General, and staff and financial matters. In 2016, the Board had 38 members, all non-executive.</p> <p>Given the size of the EEB board the Panel would like more details on the creation of an ExCom, and would like to know how its members communicate with Board members regarding issues to be discussed at board meetings</p>
4.4	<p><b>Feedback from internal stakeholders</b></p> <p><i>Addressed</i></p> <p>The report focuses on avenues for staff to provide input. Although staff do not have the right to make representations to the AGM, some members of staff attend to provide technical or policy input to the discussions as needed. An annual staff retreat allows staff to come together to assess strengths, weaknesses, opportunities and threats facing the EEB, to provide input on certain topics, and set up staff working groups. Are there other mechanisms through which staff can provide feedback on a more ad-hoc basis, or in an anonymous manner, such as through a staff survey?</p> <p>In future reports, the Panel would be interested in some examples of feedback received and what action was taken in response.</p>



	<p>The EEB's members are able to provide input through general AGM discussions or by tabling resolutions for the General Assembly to consider. Again, is there another avenue for feedback (which may not be significant enough to table a resolution on) such as a member's survey or periodic phone calls between members and the Secretariat?</p>
4.5	<p><b>Compensation for members of highest governance body</b></p> <p><i>Partially addressed</i></p> <p>The report states that members of the General Assembly and Board are generally not compensated for their time but are reimbursed for expenses such as travel or accommodation. A provision of €10,000 is available for costs associated with activities of the President, and while it has generally not been used, virtually all of the funds were used in 2015 and in 2016 due to increased activities and the fact that he ceased to receive a salary. This raises the question as to whether the President, as the Chair of the Board, is actually compensated for his time? Associated with this, the Panel would appreciate details as to what the payments were for (i.e. were they a reimbursement of expenses incurred), and the process used to authorise and account for them (including whether or not they had been approved by the Board itself).</p> <p>A review of the salary scale for all staff has been ongoing for several years, and has been mentioned from EEB's 2013 accountability report onwards. Is there an expected timeline for the conclusion of this process?</p> <p>The new reporting questions, which the EEB will begin working with for its next report, ask for the salaries of the top five most senior positions in the organisation, as well as the ratio between top and bottom salaries – the Panel looks forward to this information in the next report.</p>
4.6	<p><b>Conflicts of interest</b></p> <p><i>Addressed</i></p> <p>All full EEB members are screened to ensure they are 'independent of any commercial, industrial or party political influence or interest'. Any concerns regarding conflicts of interests can be brought to the attention of the General Assembly by the Board, Secretary General or any member.</p> <p>The Panel notes that conflict of interest (COI) requirements appear to cover professional as opposed to personal COIs only. It also notes that there appears to be no process in place whereby board members (or others) are required to re-confirm any COIs on an annual basis. What process is in place to assess and manage actual or potential COIs?</p>





4.10	<p><b>Process to support highest governance body's own performance</b></p> <p><i>Partially addressed</i></p> <p>The EEB's Statutes and the Standing Orders outline the main procedures governing the functioning of the General Assembly, and the Board has its own Modus Operandi.</p> <p>There is no formal process to evaluate the General Assembly's or the Board's performance. Due to the increase in size of the Board in recent years, an Executive Committee was set up to support the Board's work, and an initial evaluation of the Committee's work was due to be discussed by the Board in 2017. The Panel would be interested in the outcomes of this evaluation, and also encourages the EEB to adopt some form of periodic review of the Board's and General Assembly's performance, which might include a self- or peer-evaluation.</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 any 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>The EEB's internal stakeholders are their members. Other stakeholders include individuals, Member State governments, the political institutions of the EU, funders, and various partners. Although not mentioned, the Panel would like to flag that EEB's staff are also a key (internal) stakeholder group.</p> <p>The report provides an explanation of how membership applications are reviewed and approved, and how external stakeholders are identified. Some more information about prioritisation of external stakeholders is requested in the next report – is there a focus on organisations/people focusing on particular issues, or operating in certain sub-regions of the EU, for example?</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>The report provides an overview of how internal and external stakeholders are involved in various aspects of programmes and policies. An update is also provided on the five key points the EEB had committed to achieving in its 2014 accountability report – the Panel appreciates this follow-up and notes positively the progress made.</p> <p>For members and staff, there are eighteen working groups working on developing and evaluating policies. The annual work programme is created by staff with input from members via an online survey, and is approved by the AGM. Progress on the work programme is overseen by the General Assembly, with the Secretary General providing periodic reports. It is stated that there is clear evidence that stakeholder engagement has positively affected decision-making in the organisation and reshaped policies or procedures – some concrete examples would help illustrate this.</p> <p>External stakeholders are able to engage in and influence the EEB's policies through involvement in events, such as the Annual Conference which brings together a wide range of stakeholders. Are these stakeholders consulted regularly, on the further development, implementation, and possible revisions to policies or other work?</p>
NGO2	<p><b><i>Mechanisms for feedback and complaints</i></b></p> <p><i>Addressed</i></p> <p>The Panel is pleased to see that the EEB adopted a <a href="#">complaints policy</a> in 2017, and has published it on the website, together with a dedicated complaints email address. The policy covers what does (and does not) constitute a complaint, how to file a complaint, the timeline for a response, and what to do to escalate the matter. Does the policy cover complaints made against the EEB's members?</p> <p>The accountability report itself does not reflect these latest developments, and refers to the intention to survey EEB staff in 2017 to identify areas for improvement regarding member engagement in terms of complaints and feedback. The Panel would be interested in</p>



	<p>seeing the outcomes of this survey in the next report, as well as what follow-up action has been taken.</p> <p>It is stated that external complaints are relatively rare and that no complaints were received in 2016. It will be interesting to see whether any complaints are submitted following the publication of the complaints mechanism online.</p>
NGO3	<p><b>Programme monitoring, evaluation and learning</b></p> <p><i>Partially addressed</i></p> <p>The EEB's <a href="#">Medium Term Strategy for 2016-2019</a> was adopted in 2016, and though there aren't any detailed key performance indicators (KPIs), there are specific policy objectives against which progress can be measured. The report states that the strategic plan has not been in place for a full year yet and has not been assessed, but with this report submitted in early 2019 the Panel would have expected some sort of review to have taken place and initial results to be available.</p> <p>In general, monitoring and evaluation of programmes takes place through meetings of the EEB's various working groups. An activities report is produced for the General Assembly each year, describing responses to relevant EU policy developments, and policy achievements are outlined in the Annual Report. Does the activities report outline specific progress made against key goals and objectives, with reference to challenges as well as successes, or is there another report where such information is captured?</p> <p>In future reports (under the new reporting questions), there is a specific requirement to provide information around strategic indicators, and the Panel would be interested to know if there is an intention to develop KPIs. The Panel would like to see updates on progress made on key strategic objectives, as well as any lessons learned and how these have been shared within the organisation.</p>
NGO4	<p><b>Gender and diversity</b></p> <p><i>Addressed</i></p> <p>While gender and diversity do not play a large role in the policy work the EEB carries out, the EEB supports including such dimensions in policy documents, and collaborated with other organisations focusing on these issues. An example would help illustrate what this looks like in practice.</p> <p>The EEB has an aspirational target of 50% women speakers/moderators/panellists at EEB events, and at the 2016 Annual Conference, 40% of speakers were female – an increase from 32% the</p>



	<p>previous year. Are there any similar targets for youth? Given the fact that young people are also a key stakeholder group for environmental and climate issues, the Panel would like to know a bit more about what efforts have been taken to involve youth in the EEB's work.</p> <p>Representatives of umbrella groups representing women are on the EEB Board, and more information on diversity in the Board and workforce is provided under LA13. The Panel notes positively the EEB's <a href="#">policy on non-discrimination</a> in employment, covering a wide range of diversity/minority factors.</p>
NGO5	<p><b>Advocacy positions and public awareness campaigns</b></p> <p><i>Fully addressed</i></p> <p>The EEB works closely with its member organisations when adopting and advocacy policy positions. This is done mainly through the various working groups which are listed in the report. The Panel would be interested in some more information about how these groups work – do they carry out research? Are external sources/partners consulted?</p> <p>The EEB involves key stakeholders in events which serve to communicate and change advocacy positions, and some examples are provided. Various other communication tools are also listed. The Panel would like to know if/how these stakeholders are also included in the initial development of advocacy positions, and in the implementation and evaluation of advocacy work. A good practice example from CIVICUS can be seen in their annual report <a href="#">here</a>, pp. 20-21.</p> <p>The Panel notes positively the progress on communications, with a new visual identity and website launched in May 2017. Staff and other stakeholders were surveyed during the development of the new visual identity and website, and will feed into future communications strategies.</p>
NGO6	<p><b>Coordination with other actors</b></p> <p><i>Addressed</i></p> <p>The report states that the EEB believes in the value of working with other organisations to ensure consistency of positions and strengthen messaging to common stakeholders. Collaboration within the Green 10 and Spring Alliance, as well as commonly produced publications, press releases and conferences are mentioned as examples.</p> <p>In future reports, the Panel would like to know whether there are any policies or specific procedures guiding partnerships, as well as some</p>



	<p>more information about the EEB's specific role in partnerships – for example, capacity building, contributing resources or expertise, etc. Are partnerships reviewed and evaluated together with partners, to ensure they remain effective and valuable for all parties?</p> <p>A good example to refer to is Restless Development's approach: partnerships are based on common visions and goals, increasing impact, and comparative advantage, and there is a focus on working through existing structures, which leads to sustainable outcomes, (see their annual <a href="#">report here</a>, pg. 22).</p>
<h2>II. Financial Management</h2>	
<p>NGO7</p>	<p><b>Resource allocation</b></p> <p><i>Addressed</i></p> <p>Although not linked in the report, the <a href="#">auditor's report for 2017</a> is available online on the EEB's "About" page. The Panel notes that the audit report is based on the internal balance sheet, as - at the time of audit - the financial statements had not yet been reported following the "Belgian legal scheme". It appears that only the most recent auditor's report is available online, and that previous audit reports (also previous Annual Reports) are not on the website. The Panel encourages the EEB to include previous years' reports online.</p> <p>Resources are allocated based on an initial (board approved) work programme and budget. An evolving working budget is then developed under the authority of the Secretary General and Management Committee. Resource allocation and expenditure for projects is tracked through an analytical bookkeeping system. The Panel would be interested in knowing how regularly financial updates (and re-allocation of resources if necessary) are carried out.</p> <p>All payments are checked by the Accountant and Finance Manager, and are signed off on by the Secretary General and Finance Manager.</p>
<p>NGO8</p>	<p><b>Sources of Funding</b></p> <p><i>Fully addressed</i></p> <p>The EEB's top five donors are listed, and an update is provided on major changes to grants and funding in 2016.</p>



III. Environmental Management	
EN16	<p><b>Greenhouse gas emissions of operations</b></p> <p><i>Addressed</i></p> <p>The report lists the travel-linked CO2 emissions from 2016, and states that the EEB will continue to improve its methodology for measuring emissions. The Panel looks forward to more information in the next report about the methodology being used. A staff working group aims to strengthen measures for assessing and limiting the EEB's ecological footprint, and to raise awareness of internal policies.</p>
EN18	<p><b>Initiatives to reduce emissions of operations</b></p> <p><i>Addressed</i></p> <p>Initiatives to reduce emissions are listed, and include energy saving and waste sorting, as well as safe disposal of hazardous waste. Printing volumes are monitored, but there are no targets in place for reduction – this has been the case since 2014, and the Panel would like to know the timeline for introducing targets.</p> <p>The EEB's <a href="#">Environmental and Sustainability Policy</a> includes commitments relating to energy and water, office supplies, and waste. The implementation of the policy and possible improvements are discussed at monthly staff meetings, and a standing item about accountability and internal policies ensure staff are aware of the policy.</p> <p>As there is no Environmental Management System in place, reductions achieved are not known, but the EEB will continue exploring how to further reduce emissions. The Panel looks forward to updates in future reports.</p>
EN26	<p><b>Initiatives to mitigate environmental impact of activities and services</b></p> <p><i>Addressed</i></p> <p>The EEB's <a href="#">Environmental and Sustainability Policy</a> also includes reference to events, catering and transportation. All venues and caterers are asked for their environmental/sustainability policies, and environmentally friendly, locally sourced, vegetarian/vegan and organic options are favoured where possible.</p> <p>Email and video-conferencing is used to reduce the need for travel, trains are taken to meetings in nearby countries, and staff are encouraged to use public transport or bicycles, with a number of office bikes available for staff and visitors to use.</p>



	Overall, the EEB's approach seems sound. The Panel would like to see more information in the next report about how/to what extent the EEB's environmental policy has been implemented, and looks forward to future developments as the monitoring of environmental impacts is strengthened, and targets are set.
<b>IV. Human Resource Management</b>	
LA1	<b>Size and composition of workforce</b> <i>Fully addressed</i>
EC7	<b>Procedure for local hiring</b> <i>Fully addressed</i>
LA10	<b>Workforce training</b> <i>Partially addressed</i>  Again, as in 2015, no formal training opportunities were offered in 2016 due to changes in staff and limited financial capacity. However, informal training opportunities were offered during thematic lunches and at the annual staff retreat. In the next report, the Panel would like to see some information on how staff training needs are assessed and prioritised.  Does the EEB have an idea of when it might be able to start offering formal training again? The Panel would like to flag that there are a number of free online courses available, for example through <a href="#">Nonprofit Ready</a> .
LA12	<b>Global talent management</b> <i>Addressed</i>  All staff have an annual performance review with their supervisor, and all planned reviews were conducted in 2016. The performance review template was set to be reviewed in 2017 to include questions about how efficient staff find the reviews, and how they could be improved. The Panel looks forward to more information on this, including staff responses, in the next report.
LA13	<b>Diversity of workforce and governance bodies</b> <i>Fully addressed</i>  An overview of staff, senior management, and board members is provided, broken down by gender, age, and nationality – what do the numbers under nationality refer to? Does the EEB have any targets in place, e.g. regarding gender balance or youth (under 30)



	<p>representation? The Panel notes positively that 60% of senior management positions are occupied by women.</p>
NGO9	<p><b>Mechanisms to raise grievances</b></p> <p><i>Partially addressed</i></p> <p>The 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 or the Head of Personnel. The report references the <a href="#">anti-corruption policy</a> which includes a complaints mechanism, though this is specifically for complaints related to the implementation of financial mechanisms or management of funds.</p> <p>Is there a policy outlining the process for internal complaints beyond those related to finances, such as an internal complaints policy or a whistleblower policy?</p> <p>It is stated that the mechanisms for internal grievances were to be reviewed in 2017 – the Panel requests more information on this in the next report.</p> <p>The Panel also requests an overview of the number of internal complaints received and how they were resolved.</p>
<p>V. Responsible Management of Impacts on Society</p>	
SO1	<p><b>Managing your impact on local communities</b></p> <p><i>Addressed</i></p> <p>The report outlines several achievements from 2016, which are expected to have positive impacts on the environment and wider society. The report would have benefited from some more explanation of how exactly these achievements are expected to have positive environmental impacts. In terms of the EEB's own impact, these are mostly due to office operations and meetings, and the approach to minimising negative impacts was outlined under EN26 above.</p> <p>The report also states that the EEB incorporates CSO values such as labour rights, human rights, and child protection into its work and policy positions. Some examples of what this looks like in practice would be helpful.</p>





SO3- SO4	<p><b>Anti-corruption practices / Actions taken in response of corruption incidents</b></p> <p><i>Addressed</i></p> <p>The Panel is pleased to see that the EEB's <a href="#">anti-corruption policy</a>, which includes a complaints mechanism related to the implementation of financial mechanisms or management of funds, is now available on their website. The policy is comprehensive, covering the prevention of corruption as well as identification and action on incidents.</p> <p>The policy states that the EEB educates staff and members about the anti-corruption policy – some more information about this would be welcome in the next report, e.g. are there trainings provided, do all staff/members need to undergo trainings, what percentage of staff have already been trained, and how often are staff reminded of the policy?</p> <p>No incidents of corruption were reported in 2016.</p>
<b>VI. Ethical Fundraising</b>	
PR6	<p><b>Ethical fundraising and marketing communications</b></p> <p><i>Fully addressed</i></p> <p>The report provides a comprehensive overview of the types of companies from which EEB does not accept donations and explains that although they receive core funding from the European Commission, this does not compromise their independence – examples supporting this are provided. At the same time, the EEB is working to reduce their dependence on EC core funding, with the core grant representing 21.6% of total funding, down from 39.6% in 2011. Guidelines on ethical fundraising from the private sector has been shelved due to prioritisation of further efforts to increase foundation funding.</p>