

Dear Jeremy Wates,

On 15th November 2012 we, as the Independent Review Panel, met to discuss the reports submitted by the reporting deadline of 1st October 2012, and we are now writing to you to give you feedback on your report. First of all we would like to thank you for your participation in this exercise and to recognise the commitment to accountability that this demonstrates.

Our approach to assessing the reports which we have received has been to focus on three dimensions in particular: What evidence is there of **institutional commitment** to greater accountability and to using the reporting process to advance it? How **complete** is the report in relation to the guidelines used? How strong is the **evidence** given for the self-assessment that each organisation has conducted? Please find more information on our approach in the annex.

Since we first started assessing the reports we have noticed a **marked improvement in quality** and an improved commitment to accountability. In this round we have reviewed some reports of very good quality. However we have highlighted some common **areas for improvement**. These tend to be in the section on Programme Effectiveness, in particular the indicators related to having a complaints handling mechanism in place (indicator NGO2) and diversity and ethnicity (indicator NGO4). The indicators on training in anti-corruption policies (indicator SO3) and on financial information (indicator NGO8) are also areas for improvement.

- With regard to the **complaints handling mechanism** (indicator NGO2), we would like to remind Members that it is now a mandatory requirement for Charter Members to have such a mechanism in place. This is at the core of good accountability. Such a mechanism should be for external and internal complaints, outline a clear process, including a timeframe for resolution, and be easily accessible. Members should communicate their membership on their website, by uploading the Charter logo, and inserting a link to the Charter text alongside their complaint handling mechanism. The “UN protect, respect, remedy framework” highlights good effectiveness criteria for complaints handling mechanisms (paragraph 31 “Effectiveness criteria for non-judicial grievance mechanisms”):
http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf.
- Regarding **diversity and ethnicity** (indicator NGO4), we would like to encourage Members to use the guidelines “Make Development Inclusive – How to include the perspectives of persons with disabilities in the project cycle management” developed by CBM available here: <http://www.make-development-inclusive.org/toolsen/pcm2.pdf>
- With regard to the generally weak reporting on **anti-corruption policies** (indicator SO3), we would like to encourage Members to use the Anti-Bribery Checklist and Anti-Bribery Principles and Guidance for NGOs produced by Transparency International available under the following web-links:
http://www.transparency.org.uk/attachments/046_NGO_Anti-bribery_Principles_and_Guidance.pdf and <http://www.transparency-se.org/TI-ABC-20-point-anti-bribery-checklist.pdf> In case of specific queries you may also contact Stan Cutzach at Transparency International at scutzach@transparency.org
- We feel that the **financial information** (indicator NGO8) could be better presented in order to allow for greater transparency. Members are encouraged to look at the Good Practice document to see how others present this information.

- In many reports Members just noted that they have the relevant policies in place but we feel that **more examples** of the policies in practice would be useful. Only when it is supported by evidence does the policy come to life and its usefulness can then be assessed. Members are encouraged to give selective examples where relevant, and to give evidence from evaluations where available.
- We value **succinctness and accessibility**. In some reports access to relevant information is made difficult by a lot of immaterial information being given at the same time. Please try and include only essential information.

We understand that it is a challenge for global organisations to report on many national entities, and would encourage them to provide in their report an explanation as to how their **global accountability standards** are upheld at a national level and, if they are not, how they tackle this issue.

We welcome it when organisations make commitments for the future and identify areas for improvement. As an example, we would like to congratulate Oxfam GB for the table included at the beginning of their report showing their **accountability objectives** and the progress made so far. Individual development plans will help push organisational development towards improved accountability in a more systematic way.

To ensure a greater link between the **Charter commitments** and GRI reporting (focussing on transparency) we would like to emphasise our support for the Charter Board decision that all future reports should have a clear link between the Charter principles and the reported actions. We would like to praise Sightsavers for doing so in their first report.

Please note that as a Panel we feel that part of our role is to encourage organisational improvement. To that end we are enclosing, for your information, some examples of what we believe to be **Good Practice** in responding to some individual indicators, based on the GRI framework. This document consists of examples from all reports reviewed thus far. We would like to encourage you to look at this document as we feel this will be a good learning exercise for all Members to learn from each other.

Organisation-specific feedback to European Environmental Bureau

The report is a reasonable attempt for a first report and presents a coherent picture of the organisation which is positive. The report is fairly **complete** but the level of **evidence** is weak. More examples and evidence on the operation would strengthen the report. It is clear that your organisation took this reporting process seriously, but there are some areas for improvement, the **institutional commitment** to accountability could be stronger and the organisation could do better in implementing its Charter commitments.

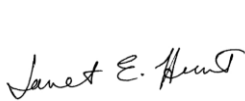
The complaints handling mechanism is an area for improvement, in particular because it is now a mandatory membership criterion. Your organisation should have a written and accessible policy (indicator NGO2). We see room for improvement with regards to your anti-corruption policies and procedures (indicator SO3). As a small organisation, we understand that it might be difficult to measure your greenhouse gas emissions; however being an environmental organisation, it is particularly important that you calculate your emissions (indicator EN16). In addition the organisation is encouraged to look at the effectiveness of advocacy (indicator NGO5).

Finally, we considered that given the heavy dependence on EC funding, you might like to explain how you ensure that this does not compromise the independence of your analysis.

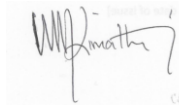
Our intention is that this letter, and any response that you may wish to provide, should be made publicly available on the Charter website, along with your organisation's report. You can find the reports that were previously reviewed on the Charter website under the section Charter Members/Member Reports. However, should there be errors of fact in the feedback above or in the more detailed note below on conformity with the reporting framework, we would of course wish to correct these before publication.

Should you have any comments we would appreciate a response by 15 January 2013.

Yours sincerely,



Janet Hunt



Wambui Kimathi



Richard Manning



Gavin Neath



Tony Tujan

Annex 1 – The Independent Review Panel’s approach to assessing reports

On **completeness**, we acknowledge the demanding nature of many GRI requirements and recognise that not all of them are as material as others. In particular for smaller organisations, some requirements may be overly demanding. Nevertheless they give good guidance and we have attached a note that goes through the shortfalls against the reporting template in detail. In addition we have highlighted areas where we felt, in particular, that your organisation could improve as well as other areas which we considered as strengths in your report.

On **evidence**, we looked in particular for references not only to relevant policy documents, but also to examples where the self-assessment was supported by specific action (for example, drawn from operational activities, whether successful or unsuccessful). It is important for us to see that the accountability commitments that you made when signing the Charter, lead to informed corrective action and ultimately improve the quality of your work.

On **institutional commitment**, we looked for evidence of top-level ownership of the report (for example in the opening statement signed by the Chief Executive) backed by examples in the report; evidence of using the report as a means of identifying areas of relative strengths and weaknesses in the organisation (as opposed to a box-ticking exercise); and evidence of a systematic concern with accountability, including recognition of areas for further work. We encourage organisations to highlight the corrective actions they take, and appreciate when they are open about their failures and make clear commitments for the future. We would hope that progress in such areas would be highlighted in future reports.

2nd Review Round 2012 Note on Accountability Report

Organisation: European Environmental Bureau
Reporting period: Calendar Year 2011

What GRI reporting level did the organisation report on?

- A
 B
 C

Did the Secretariat contact the organisation for further information before forwarding the report to the panel?

- Yes
 No

Comment: The Secretariat requested additional information on the following indicators: NGO8, LA1 and LA13. The organisation submitted a revised report with the additional information.

COMMENTS ON THE INFORMATION PROVIDED IN THE REPORT

Profile Disclosures (recommended 28)

Number of Profile disclosures the organisation reports on in total: 28

Number of the recommended Profile disclosures the organisation reports on: 28

Number of additional Profile disclosures the organisation reports on: 0

Profile	Comments
Strategy and Analysis	
1.1*	Partially addressed The statement outlines the general activities of the organisation. However it does not provide information on the strategic priorities and broader trends affecting the organisation, key events, achievements or failures or evaluate performance. The vision of the organisation is under component 2.2.
Organisational Profile	
2.1*	Fully addressed
2.2*	Fully addressed
2.3*	Fully addressed
2.4*	Fully addressed
2.5*	Fully addressed
2.6*	Fully addressed
2.7*	Fully addressed
2.8*	Partially addressed The report does not include information on the net revenues or scope and scale of activities
2.9*	Fully addressed
2.10*	Fully addressed
Report Parameters	
3.1*	Fully addressed
3.2*	Fully addressed
3.3*	Fully addressed
3.4*	Fully addressed

3.5*	Fully addressed
3.6*	Fully addressed
3.7*	Fully addressed
3.8*	Fully addressed
3.10*	Fully addressed
3.11*	Fully addressed
3.12*	Fully addressed
Governance, Commitments, and Engagement	
4.1*	Partially addressed The general structure is described however no information on committees under the highest governance body is provided.
4.2*	Partially addressed The division of responsibility between the governance body and management is not addressed.
4.3*	Fully addressed
4.4*	Partially addressed Some information is provided, however more details on how Members and staff can provide recommendations to the General Meeting and Board are necessary.
4.14*	Fully addressed
4.15*	Partially addressed The information provided only deals with internal stakeholders (EEB members) and not external stakeholders.

*: Recommended Profile components

Performance Indicators (recommended 18)

Number of performance indicators the organisation reports on in total: 18

Number of the 18 recommended performance indicators the organisation reports on: 18

Number of additional performance indicators the organisation reports on: 0

Indicators	Comments
Program Effectiveness	
NGO1*	Partially addressed The report includes information on the processes for the involvement of internal stakeholders; however it does not include information on how external stakeholders participated in each stage of the process or how feedback from external stakeholders affected the decision making process or reshaped policies and procedures.
NGO2*	Partially addressed The organisation does not give information on the submission of external complaints, on safeguards to protect complainants, or on the process for assessing and resolving complaints. The organisation is reminded that Charter Members are now requested to have complaints handling mechanism for internal and external complaints.
NGO3*	Partially addressed The organisation does not fully explain the system used for monitoring and evaluating programs, and does not provide information as to how results of monitoring and evaluation lead to changes.
NGO4*	Not addressed The organisation states that it takes gender and diversity into account when hiring/ organising conferences but it does not provide information on policies which the organisation has or follows, the tools used for analysis, or the actions

	taken to achieve gender and diversity goals. The organisation notes that gender and diversity do not play a big role in programme and policy design and implementation.
NGO5*	Partially addressed The organisation provides information as to how it formulates positions/ campaigns and how it communicates them – it also notes efforts which are being made to improve this communication. However it does not provide information on how the organisation ensures that its public criticisms are fair/accurate, changing positions/ campaigns or how it exits campaigns.
NGO6*	Partially addressed The organisation notes the need for coordination and gives concrete examples of how it is trying to coordinate with others but it does not provide information on internal policies or processes to prevent duplication, to promote learning from the work of other actors, or to coordinate with others.
Economic	
NGO7*	Partially addressed The organisation notes that the initial allocation of resources is made via the General Meeting, but it does not provide information on the processes in place to track the use of resource or the standards used for this tracking system.
NGO8*	Fully addressed
EC7*	Not addressed The organisation provides a vague outline as to the hiring procedure but does not provide any information on whether it has a global policy or common practices for granting preference to local residents when hiring in significant locations of operations.
Environmental	
EN16*	Not addressed The organisation states that the direct and indirect emissions are not calculated and it does not provide information as to whether it plans to calculate this. With EEB being an environmental organisation, this is particularly important that it calculates its emissions.
EN18*	Partially addressed The organisation includes information on some initiatives to reduce emissions, however it does not state whether they are mandatory or voluntary, or the reductions achieved.
Labour	
LA1*	Partially addressed The report does not include information on the function of the volunteers.
LA10*	Partially addressed The organisation notes that it did not have a training policy during the reporting period but has introduced one since then.
LA12*	Fully addressed
LA13*	Fully addressed The organisation states that the staff and Board, while having a very high level of national diversity, do not currently contain individuals known to come from ethnic minorities or with disabilities.

Society	
SO1*	Not applicable The organisation states that this is not applicable
SO3*	Partially addressed The organisation states that no staff were trained in the organisations' anticorruption policies and procedures. The organisation does not mention whether it has such policies, or whether it will put such training in place in the future.
Product Responsibility	
PR6*	Partially addressed The organisation states that it has a position on ethical fundraising but it does not provide information on how often this is reviewed. The report does not include information on the number of complaints received in relation to its fundraising campaigns.

*: Recommended indicators

Organisation's commitments for the future

- **NGO2:** "The EEB proposed in its Long Term Strategy 2010-2014 that the Board Members organise a yearly meeting in which it invites contact persons from the EEB member organisations... This process also allows stakeholders to influence and evaluate EEB policies and programs... The EEB did not hold such a meeting in 2011."
- **NGO3:** "One objective in the Long Term Strategy is to increase the participation of EEB members in the work of the EEB, in particular through EEB's Working Groups. As part of increasing participation, each member organisation is invited to appoint a contact person. The contact person will receive general information and publications from EEB and will attend a yearly meeting with Board members where they can comment on the services delivered by the EEB, the relevance of EEB's work to their own organisation's work and ideas for the future focus of EEB's work. This has yet to be implemented."
- **NGO5:** "One weakness that has been identified but is only now (June 2012) being addressed is the lack of information about the working groups on the website. (...) it should be possible for the public to find out from the website which working groups exist, what they do and how to get more information. This is now being rectified. (...) The EEB has already identified a need for improvement in press work with the need for a faster response and linking its own work at the EU-level into the work of its members at a national level."
- **LA10:** "In 2011, we did not have a training policy but we have introduced one for 2012, albeit with a small budget."