



ACCOUNTABILITY REPORT
OF THE
EUROPEAN ENVIRONMENTAL BUREAU
2016

Submitted to the Secretariat of
Accountable Now

December 2018

SECTION I¹

1. Strategic commitment to accountability

1.1 Statement from most senior decision-maker

With the escalation of fake news and post-truth politics in 2016 in connection with the Brexit referendum and US Presidential election, the importance of establishing the integrity of civil society organisations also increased. The EEB's membership of Accountable Now is among other things a means to express our aspiration for continuous improvement in this regard.

The EEB is Europe's largest network of environmental citizens' organisations. We bring together around 140 civil society organisations from more than 30 European countries. We stand for sustainable development, environmental justice & participatory democracy.

The EEB tackles Europe's most pressing environmental problems by agenda setting, monitoring, advising on and influencing the way the EU deals with these issues.

These include issues such as climate change, biodiversity, circular economy, air, water, soil, chemical pollution, as well as policies on industry, energy, agriculture, product design and waste prevention among others.

We are also active on overarching issues such as sustainable development, good governance, participatory democracy and the rule of law in Europe and beyond. 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 Accountable Now contributes to that goal.

For the EEB, accountability means:

- Clear reporting to our members on how we have implemented the annual work programme and budget they adopt through the General Assembly and to our donors on how their grants have been used;
- Stimulating membership engagement to make sure that our members' views are reflected and represented in our activities;
- Responsibility to provide transparent information about our purpose, goals, governance structure, funding, activities and achievements to the general public via our website and other communication tools as well as in response to individual enquiries or comments.

As demonstrated in this report, progress continued to be made on accountability matters in several fields in 2016, including putting together a first report on CO2 emissions from travels linked to EEB activities and adopting and publishing the [EEB's Environmental and Sustainability policy statement](#).

The EEB also continued to evolve and address internal governance and organisational matters in 2016, notably by creating a new membership category for affiliate members and setting up an Executive Committee consisting of the President and Vice-Presidents.

¹ The numbering of paragraphs in this document follows that of the template provided by Accountable Now (including where some numbers appear to be skipped).

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.

The EEB's long-term goal is to build an accountability evidence bank that will be understandable, meaningful and accessible to all stakeholders. Membership of Accountable Now and publication of this report is an important step for an EU-NGO toward improving and communicating organisational accountability.

We continue to encourage and support our member organisations to respect high standards of accountability in their own operations.

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

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 include the following:

- Advocacy 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;
- Providing high-quality information and promoting positions through 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
- Organising or participating in conferences, seminars and workshops.

These methods require us to work with experts, scientists, politicians and our members to develop and promote 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.

2.3 Operational Structure

The EEB is a European network of non-governmental environmental organisations. It is made up of full members, associate members, affiliate members² 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 and affiliate 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 or which, despite meeting those criteria, opt to apply for associate or affiliate 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 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. There are also additional seats on the Board for up to ten representatives of European networks. The General Assembly elects a President, at least two Vice-Presidents and a Treasurer, who also serve as members of the Board, being from one of the aforementioned categories. The Board has full power to manage and administer the EEB between meetings of the General Assembly. As mentioned in article 14.3 of the Statutes, Board members are elected for a period of three years and may be re-elected. The Statutes do not specify a limit as to how many times a Board member may be re-elected.

In 2016, the Board decided to establish an Executive Committee (ExCom) consisting of the President and the Vice Presidents. While respecting the role and mandate of the Secretary General, the ExCom may i) discuss and prepare Board discussions and decisions, ii) discuss the follow-up of decisions made by the Board, iii) make decisions when explicitly requested or mandated by the Board, and iv) carry out the annual appraisal of the Secretary General.

The Board appoints a Secretary General who serves as the chief executive of the organisation.

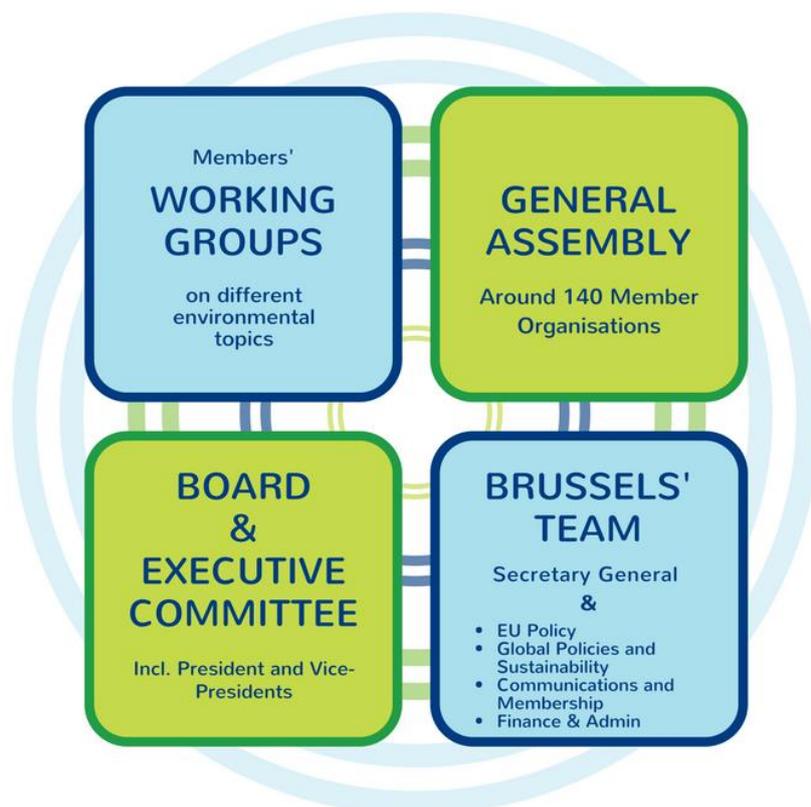
The Secretary General's responsibilities include:

² New membership category as adopted at the 2016 AGM.

- 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 meetings of the EEB General Assembly and Board;
- Strengthening cooperation between 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 2016 comprised four teams, namely the EU Policy Unit, the Global Policies and Sustainability Unit, the Membership and Communication Unit and the Administration and Finance Unit.

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 are made up of representatives of EEB member organisations and meet usually once or twice a year. They are generally serviced by the responsible EEB Policy Officers, who work to promote the demands of the members by communicating with the European Institutions.



The EEB also works in various coalitions and alliances. It is an active member of the Green 10, a grouping of ten of the largest Brussels-based green NGOs working at EU level. The EEB has also been working with ETUC, CONCORD and Social Platform, including within the framework of the Spring Alliance. We have also worked closely with the European Consumers' Organisation (BEUC) for over a decade on product related issues and with individual companies on product and on waste related issues. In 2016, we played a central role in building up SDG-Watch Europe, a multi-stakeholder CSO coalition set up to advocate for ambitious implementation of the SDGs in and by Europe.

2.4 Location of organisation headquarters

The legal seat and the headquarters of the EEB throughout 2016 were located at 34 boulevard de Waterloo, B-1000 Brussels.

2.5 Number of countries where the organisation operates

The EEB has full, associate and affiliate members located throughout Europe in more than 30 countries. At the end of 2016, it had members in Austria, Belgium, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, Former Yugoslav Republic of Macedonia, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Luxembourg, Malta, Moldova, Netherlands, Poland, Portugal, Romania, Serbia, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkey, Ukraine and United Kingdom.

The EEB membership list can be found at <http://eeb.org/membership/our-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, associate and affiliate 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 EEB's primary target audiences are 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.

The EEB also seeks to influence other institutions and stakeholders whose positions may in turn influence the primary target audiences. 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 are affected, one way or another, by environment-related policies; they include EEB members, full, associate and affiliate, and staff; and they include the wider public.

Environmental challenges for Europe can and do overlap with global and international environmental challenges. 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.

Citizens around the world may therefore 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.

The EEB Global Policies and Sustainability Unit is dedicated to global and regional policy processes that support or affect environmental sustainability, such as those under UNEP and OECD, and the Rio+20 follow-up process which led to the adoption in 2015 of the 2030 Agenda for Sustainable Development and the Sustainable Development Goals.

2.8 Scale of reporting organisation (2016 data)

Total number of members and/or supporters: 144 member organisations at the end of 2016, themselves having a combined membership of some 15 million citizens.

Total number of staff posts:	37
Total number of trainees:	4
Total number of volunteers:	4
Income for 2016:	3,242,552 Euros
Expenditure for 2016:	3,242,552 Euro
Assets:	3,055,637 Euros
Liabilities:	3,055,637 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.

The scale and scope of activities can be seen via the EEB website <http://eeb.org/work-areas/>

2.9 Significant changes during 2016

In 2016, the EEB adopted statutory changes to provide for a new membership category for affiliate members and to allow members to opt for associate or affiliate membership even if they fulfil the criteria for full membership. The new category was introduced since it was considered useful to have another category of membership for those not eligible for or interested in full or associate membership – for instance for organisations that have companies among their members. Another

significant change was the decision taken by the Board at its meeting in June 2016 to establish an Executive Committee (ExCom) with the President and the Vice Presidents as members. The Board decided that the tasks of the ExCom, while respecting the role and mandate of the Secretary General, may include to i) discuss and prepare board discussions and decisions, ii) discuss the follow-up of decisions made by the board, iii) make decisions when explicitly requested or mandated by the board, and iv) carry out the annual appraisal of the Secretary General. It also agreed that the ExCom should come back to the first Board meeting in 2017 with an evaluation of the work done and, if needed, a proposal for a more precise Modus Operandi for the ExCom. The ExCom reports to the Board when needed, and always at each Board meeting.

2.10 Awards received in the reporting period

None

3. Report parameters

3.1 Reporting period

Calendar year 2016

3.2 Date of previous report

In February 2017 the previous report for the year 2015 was submitted.

3.3 Reporting cycle

Annual

3.4 Contact for any questions regarding the report

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3.5 Process for defining report content

Due to its nature as a network 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 policy demands of different European environmental organisations and presenting these at an EU 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 Accountable Now Reporting Template.

The accountability 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 Accountable Now reporting, and promote enhanced accountability in their own operations. The report will be posted on the EEB website to further demonstrate the EEB's commitment to accountability.

3.6 Boundary of the report

The focus of this report is the functioning of the EEB as a network, covering the main aspects of its governance such as General Assembly, Board, working groups and staff.

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 organisations except insofar as they are relevant to the functioning of the EEB's activities as a network.

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

None of the EEB member organisations has 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.

While the report does not cover the activities of EEB member organisations, the EEB through routinely bringing its own endorsement of the Charter to the attention of its member organisations has indirectly encouraged them to also comply with it and we will continue to do so. It would not be feasible within current resource constraints to carry out any compliance assurance in relation to the individual member organisations, nor is there any mandate to do so, and indeed the fact that the membership criteria laid down in the EEB statutes do not refer to the Charter would prevent any imposition of the Charter and argue rather in favour of continuing a recommendatory approach.

3.10/3.11 Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.

None

3.12 Reference Table

This report follows the structure of the Reporting Template.

4. Governance and stakeholder engagement

4.1 Governance structure and decision making of the organisation

See answer under heading 2.3 Operational Structure

4.2 Division of powers 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 is not a member of the Board. The Board is his/her employer. Thus there is a clear division of responsibility between the highest governance body and the management and/or executives.

The Board has an oversight role in relation to the management of the organisation 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 EU Environment Commissioner or President of the EU 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.

The Executive Committee (ExCom) prepares and follows up on Board decisions. It can also make decisions when explicitly mandated by the Board. The Board's oversight of the financial management and staff matters (for which the Secretary General has day to day responsibility) is delegated to a Management Committee consisting of the President, the Treasurer and one or more other Board members, which reports to each Board meeting. The Board also establishes time-limited task forces to work on specific issues. There were no formal task forces in 2016.

The EEB Secretary General is responsible for the day-to-day running of the office and staff of the EEB, see 2.3 Operational Structure.

4.3 Number of members of the highest governance body. How many are independent and/or non-executive members?

In 2016, there were 38 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 Assembly, notably the adoption of 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. However, members of staff are routinely encouraged and in some cases required to attend the AGM and provide support (e.g. expert technical or policy input) to the discussions as needed.

Apart from participating in the AGM discussions on issues such as the work programme and budget, individual member organisations may bring issues of specific concern directly to the attention of the General Assembly by tabling resolutions.

In 2016 as each year, the annual Staff Retreat provided an opportunity for the staff to come together to assess the strengths, weaknesses, opportunities and threats facing the EEB, to influence positions on certain topics under discussion within the highest governance body via the Secretary General 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 all levels of staff.

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 generally not compensated for their time. They are entitled to claim reimbursement for out-of-pocket expenses such as travel and accommodation related to participation in Board meetings and AGMs. 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 this amount was used in 2015 and most of it in 2016, 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 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. A review of the salary scale for all staff, following a decision to link this with a broader review process being undertaken by a group of Brussels-based NGOs, continued but was not concluded in 2016. The aim is to ensure that the EEB's system of salaries and related benefits contributes to the effective delivery of the EEB's work programme, takes account of the organisation's limited resources and the need to deliver value for money, attracts and retains high quality staff, recognises the individual needs of staff (e.g. in relation to career development opportunities) and ensures fairness. There are no specific rules or guidelines governing departure arrangements.

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

The highest governing body of the EEB is the General Assembly where all the member organisations are represented. The statutes specify that all full members (those with decision-making power) must be 'independent of any commercial, industrial or party political influence or interest' (Art. 5.1). These criteria are applied by the General Assembly in relation to organisations applying for EEB membership (see section 4.15 below for more information on the membership application process). With respect to existing members, it would be open to the Board, the Secretary General or any member organisation to raise a concern over whether a member continues to meet the above criteria, ultimately by bringing the issue to the attention of the General Assembly, though this has not happened in recent years.

As regards other levels of the organisation, the Board has adopted an anti-corruption policy. Through this policy, the EEB commits to a strict zero-tolerance policy on corruption. Specifically, the EEB commits to:

- tackle all instances of both high-level and low-level mismanagement and corruption with equal conviction;
- deploy resources to fight any corruption in a targeted and efficient manner;

- respond quickly and professionally to any indications of mismanagement or corruption;
- ensure sufficient anti-corruption capabilities.

There were no reported conflicts of interest or mismanagement complaints in 2016.

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

The main procedures governing the functioning of the General Assembly are laid out in the Statutes and the Standing Orders. The Board is mandated under the statutes to develop its own procedures governing decision-making, including decision-making between meetings, and all other actions of the Board, provided these are consistent with the Statutes themselves. The Standing Orders of the General Assembly apply mutatis mutandis to the actions of the Board where the Board has not established its own procedures with respect to a matter. The Board's procedures are described in the Board's own Modus Operandi. A first, consolidated version of this document was completed in 2015 and further developed in 2016.

At a more operational level, there is not a formal process in place to evaluate the General Assembly's performance, the main 'check' being provided by the transparent and democratic procedures of the General Assembly themselves. As regards the Board, the increase in its size over recent years, resulted in the decision in 2016 to set up an Executive Committee (ExCom) to support the work of the Board. It was agreed that the ExCom should come back to the first Board meeting in 2017 with an evaluation of the work done and, if needed, a proposal for a more precise Modus Operandi for the ExCom.

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

The EEB does not subscribe to any permanent charters relating to our own modus operandi other than Accountable Now.

The EEB frequently collaborates with other stakeholders to prepare and sign up to externally developed statements promoting environmental and/or social principles. Some of these are aimed at providing input to a decision-making process, sometimes on a specific policy issue, at a specific moment in time; others have a longer shelf-life and may be more horizontal in scope.

4.14 List of stakeholder groups

The internal stakeholders are the EEB members. EEB members and partners 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 wishing to join the EEB must apply to the EEB for membership. An organisation applying for admission as a full, associate or affiliate 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 EEB Board. In addition, as mentioned above, the applicant must establish that it is not dependent on any commercial, industrial, or political influence or interest.

When a membership application is received, the Management Committee appoints two scrutineers to assess the application (including the fulfilment of the independence criteria) and report to the Board which in turn makes a recommendation to the General Assembly. Based on the recommendation 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.

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

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

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 working groups, of which there were eighteen in 2016. The working groups are established by the General Assembly and run by the relevant EEB policy staff 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 2016 the EEB organised 28 meetings of the Working Groups, one annual meeting of the General Assembly (AGM) and three meetings of the Board. The annual staff retreat held in July 2016, held about a fortnight after the UK referendum on EU membership, was also used to strategise around the implications of Brexit for the EEB's work and approach.

As regards the work programme, the first draft of the next year's work programme is initially built up within the staff, with input being solicited from the full membership through an online survey, before being transmitted to the Board and then the AGM. Thus the staff are mainly involved in the early part of the process, with the EEB members having the final say through reviewing and revising the draft in the Board before finalising and adopting it at the AGM.

As regards the process of reviewing and reporting on the work programme, a report from the Secretary General on implementation of the work programme is submitted to the General Assembly shortly before the AGM covering the period since the submission of the equivalent report to the previous AGM. In addition, two interim reports from the Secretary General are submitted to the Board at more or less four-month intervals during the year. All of these reports are drafted with input from the staff.

There is clear evidence that stakeholder engagement processes have positively affected EEB decision-making or reshaped policies and procedures. As regards internal policies, staff have also influenced the outcomes, such as on policies on reducing the environmental footprint of the Brussels office.

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.

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 the draft EEB work programme for the upcoming year through online surveys; the circulation of information on EU policy developments to members;

sending members an electronic newsletter every three months with information on upcoming EEB activities; and providing information on Commission consultations to members.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to achieve over a three-year period the following improvements as regards processes for involvement of affected stakeholders:

1. *Assess mechanisms for stakeholder engagement in order to identify areas for improvement.*
2. *Create a dynamic visual representation that shows where all EEB members are, Europe-wide plus locally within each Member State. This will facilitate understanding of the reach of EEB and support networking.*
3. *Create a visually impactful representation of the EEB decision-making structure and mechanisms for interaction among staff and members. This will facilitate understanding of EEB operations and promote greater levels of involvement.*
4. *Send to all members the final version of the INGO report and ask them to commit to support the Charter accountability commitments in the period ahead.*
5. *Enhance coordination with environmentally sustainable businesses, and relevant small and medium sized businesses to build understanding, capacity and commitment to environmentally sustainable business models.*

Concerning point 1, a contract was signed with Dropbox 2016 with the aim to strengthen membership engagement by providing a new platform for sharing documents. The system will be fully operational in 2017. The EEB secretariat also started to evaluate its working group and annual events in a more structured way, using standardized SurveyMonkey templates for ease of comparison and for spotting trends.

Substantial progress was made on point 2 as part of the rebranding. The preparatory work was carried out with the contracted communications agency Old Continent and included surveys and stakeholder interviews. The new visual identity and website was launched in May 2017 at www.eeb.org

Concerning the third point, the 2015 Accountable Now report was circulated to the EEB members in spring 2017 with an encouragement to support the Accountable Now principles.

Concerning the last point, efforts to enhance coordination continued in 2016. EEB policy officers frequently held meetings with business and industry stakeholders to engage mutual interest on EU environmental policy, notably in relation to energy efficiency (within the framework of the Coalition for Energy Savings) and the implementation of the circular economy action plan that was adopted in December 2015.

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 EU Policy Director, the Global Policies and Sustainability Director, the Membership and Development Manager, 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. No external complaints were received in 2016.

The EEB had not yet established and publicised a more formal complaints mechanism in 2016 though the aforementioned anti-corruption policy provided some elements of such a mechanism.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards mechanisms for feedback and complaints in relation to programs and policies:

6. *Survey member organisations on EEB performance to identify areas for improvement.*

Envisaged for 2017

7. *Survey of EEB Staff on member engagement to identify areas for improvement.*

Envisaged for 2017

8. *Establishment of a more formal and transparent complaints handling mechanism covering both internal and external complaints.*

To be published on the new website during the course of 2017

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 used for a more thorough evaluation. At the level of the membership, the various working group meetings (see NG05) which occur typically once or 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 for the General Assembly each year in which it describes its responses to EU policy developments in each area of its work programme. Highlights of successful policy achievements are reported in the Annual Report with a view to reaching wider (including non policy) audiences.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvements as regards the system for program monitoring, evaluation and learning.

1. *Strategic Plan 2015-2020 to include overarching and detailed KPIs.*
2. *Annual KPI assessment, evaluation, identification of lessons to be learned, and set of detailed written recommendations*

The EEB's Medium Term Strategy for 2016-2019 was adopted at the 2016 AGM. It sets out the EEB's policy and organisational objectives and is available for download on the EEB website.
<http://eeb.org/homepage/about/>

The Strategic Plan has not yet been in place for a full year and has not yet been assessed. It does not include detailed KPIs in any area but does include specific policy objectives against which progress can be measured.

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 and collaborates well with other organisations for which these issues are the main objective, e.g. Social Platform and its members. The EEB has a policy on non-discrimination, also covering gender which is available on the [About page](#) on the EEB's website.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards measures to integrate gender and diversity into program.

1. *Target: 50% women speakers/moderators/ panellists at EEB events. More speaker diversity at EEB events.*

The 2016 Annual Conference had 18 male and 12 female speakers, an increase compared to the 8 female speakers at the 2015 Annual Conference. The 50% target must be considered as aspirational given the need to take into account other considerations (e.g. higher numbers of refusals from invited female speakers) and the fact of gender imbalance among top representatives of the stakeholders we are seeking to engage.

2. *Enhanced coordination with EU-level gender, youth, development and diversity groups.*

Representatives of umbrella groups representing women (Women Engage for a Common Future) and youth (Youth and Environment Europe) are represented on the EEB Board. The EEB continued to cooperate and coordinate closely with such groups during 2016 (e.g. in the context of the Aarhus and SDG processes).

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

Advocacy and public awareness raising continue to be an important part of NGO work. To ensure solid legitimacy and effectiveness in these aspects of its work, 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 policy positions in partnership with member organisations.

The EEB had Working Groups in 2016 on the following topics:

1. Agriculture
2. Air pollution
3. Biodiversity
4. Bio-energy
5. Chemicals (REACH)
6. Ecolabel
7. Ecological Product Policy
8. Energy efficiency
9. Environmental Fiscal Reform
10. Industry (IED/ Seveso)
11. Law-group
12. Nanotechnology
13. Natural resources / SCP
14. Noise
15. Soil
16. Waste
17. Water
18. Rio+20 follow-up

The majority of the working groups met physically while the Rio+20 group only worked virtually due to budget limitations. In addition, the EEB coordinated networks on mercury (the Zero Mercury Working Group, which we coordinate jointly with the Mercury Policy Project), 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 coordinates and interacts with other NGOs.

In 2016, the EEB organised several events involving key stakeholders that serve to communicate and change advocacy positions. Some events are linked to public awareness campaigns. Types of events range from smaller meetings with Members of the European Parliament, European Commission staff and Member States' Permanent Representation staff to larger public events such as the EEB's [Annual Conference](#). On 14 September 2016, the EEB also held a successful high level biodiversity conference in which NGOs discussed with policy-makers the various actions needed to meet the EU's biodiversity targets.

The EEB has a range of communication tools at hand to ensure that it distributes information to its members and to stakeholders more generally. Those include:

* A website with detailed information about each work area and including a Publications section. The contact details for the Policy Officer working at the EEB who carries responsibility for servicing each area of work are also provided on the EEB website alongside the information on the work activity.

* A quarterly newsletter – Metamorphosis – which is available online and in a printed version.

* The EEB's Global Policies and Sustainability Unit also produces a digital newsletter called the Switch.

* A weekly News Digest sent to EEB members and staff.

* Press releases and reactions

* Social media channels including Facebook, Twitter and LinkedIn.

* Mailing-lists of the working group and dedicated mailing-lists for the whole membership, the Board and the Executive Committee.

Media coordination between the EEB office and members at a national level is constantly being improved.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards processes to formulate, communicate, implement, and change advocacy positions and public awareness campaigns

1. Review communication strategy to reach members and other stakeholders more effectively.

In 2016, the EEB started the production of a new visual identity and website together with the commissioned communications agency Old Continent. As part of this exercise, surveys and interviews with staff and stakeholders were held on several occasions to refine messaging for the different target audiences and develop the look and tone of the new visual identity. The new visual identity was launched in May 2017 together with the new website www.eeb.org. The surveys conducted provide valuable insights that will shape the further development of the EEB's communications strategy over the coming years. The new website also provides the EEB comms teams with the latest in analytics and tracking of use of the website that will also provide useful insights.

2. Provide targeted capacity building to member associations.

In connection with the 2016 AGM, a capacity building workshop on fundraising was offered to all members. As usual, capacity building elements were also included in several of the Working Group meetings (mini-trainings on implications of new policy initiatives etc.).

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 firmly believes in the value of working closely with other organisations in order to ensure that as far as possible its position is consistent with those 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 this works 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 aim to work with partners that meet high standards of accountability.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards processes to take into account and coordinate with the activities of other actors.

1. Enhance communication/ coordination/leadership with Green 10 and Spring Alliance

Collaboration with like-minded stakeholders continued to be important during 2016, with the EEB playing a leading role in the continuing pushback against the Juncker Commission's anti-environmental agenda. This involved working closely with other stakeholders, including from the G10, non-environmental NGOs and progressive business among others. The Spring Alliance per se was not particularly active in this period.

2. Financial Management

NG07 – Resource Allocation

The initial allocation of resources for 2016 was made through the 2015 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. The allocation of resources and use of funds for different projects is managed and tracked through the use of an analytical bookkeeping system. All the payments are checked by the Accountant and the Finance Manager and signed off by the Secretary General and the Finance Manager. Each year, the Annual Accounts are audited by the EEB Auditors. Following this yearly control, the auditor delivers the statutory auditor's report that is presented to the General Assembly at the AGM.

Expenditure (Euros) 2016

General Costs:	279,644
Personnel Costs:	2,151,955
Activities:	810,953
Allocation to working capital:	
Extraordinary costs:	
<u>Total Expenditure:</u>	3,242,552

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards resource allocation.

2. *Increase reserves*

In 2015, the EEB managed to add 20.585€ to the reserves, bringing them up to 586,213€. However, following a substantial (€200,000) reduction in its LIFE core grant from the start of 2016, the EEB needed to draw €120,007 from the reserves at the end of the year, bringing the total reserves down to €466,205. The General Assembly had foreseen the need to allow for this through mandating a deficit of about €170,000 in the 2016 budget, though in the event the deficit was significantly less.

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

In the year 2016, the EEB's gross income was 3,122,545 Euros, coming from the following sources:

Trusts and Foundations:	1,069,180 Euros
European Union:	899,491 Euros
Intergovernmental and Non-governmental Organisations:	513,845 Euros
Governments:	321,444 Euros
EEB Members:	179,743 Euros
Other:	138,841 Euros
EEB contribution from reserves:	120,007€
<u>TOTAL EXPENDITURE</u>	3,242,552 Euros

Top 5 donors overall

EU Commission:	899,491 Euros
(of which 700,000 core grant)	
MAVA Foundation:	598,272 Euros
European Climate Foundation:	351,387 Euros
Food and Agriculture Organization of the UN:	190,169 Euros
Swedish Society for Nature Conservation (SSNC):	65,168 Euros

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards sources of funding by category and five largest donors.

- 3. Increase foundation funding and start to obtain appropriate private sector funding, while retaining current levels of EU LIFE funding.*

Levels of core grant funding under LIFE declined significantly (by 22%) in 2016 due to a change in the grant rules, namely a lowering of the ceiling for any individual grant by €200,000 which only affected the EEB and one other beneficiary. Levels of foundation funding declined by 22% in 2016 compared to 2015, with some significant grants from the Villum Foundation and Sigrid Rausing Trust coming to an end and not being fully offset by increased funding from the European Climate Foundation and MAVA. Fortunately funding revenue from other organisations, governments and EEB members increased during the year (by 25%, 23% and 27% respectively). Efforts to explore private sector funding were not significantly pursued during 2016 as it was felt that the potential for further developing partnerships with foundations had not been sufficiently explored.

3. Environmental management

Climate change poses a fundamental and cross cutting threat to equitable and sustainable development. Alongside our work to influence external policies on climate change and renewable energy policy, we have progressively been putting in place internal measures to limit the negative environmental impact arising from the functioning of the organisation.

The staff working group 'Greening the EEB' aims to strengthen and make more explicit internal policies and measures for assessing and limiting the EEB's ecological footprint.

The EEB Staff meeting is the forum that monitors application of 'Greening the EEB' guidelines and reviews overall progress.

EN16 – Total direct and indirect greenhouse gas emissions by weight

In 2016, 478 travels* were carried out linked to the implementation of the EEB's Work Programme with a total of 125 ton of CO2 emissions, or an average of 0.257 per journey. In 2017, the EEB will continue to improve its methodology for measuring CO2 emissions.

*Not including travels with 0 emissions, only travels exceeding the emission reporting threshold of 0.01 ton CO2.

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. 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. However, while being in rented premises imposes some limitations on what can be achieved, we will continue to explore whether and how more can be done to reduce GHG emissions through e.g. energy efficient lights, appliances and IT equipment in offices.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards initiatives to reduce greenhouse gas emissions.

- *Assessment of GHG impact of EEB activities, including office and EEB office equipment.*

The EEB monitors its printing volumes. In 2016, the EEB printed 69,672 black & white copies and 22,103 colour copies, i.e. a total of 91,775 copies. While this might sound a lot per capita and staff member, it is worth bearing in mind that the EEB often prints programmes and reports in-house for big events. A benchmark for reduction targets has yet to be set.

Waste sorting and a composting system are in place. Small hazardous and electronic waste sorting system is in place (inks, batteries, pens, mobile phones, lamps, etc) with three collection boxes in the office. Collection system for Electrical and Electronic Equipment waste in place: broken phones, headphones, desk lamps. Collection system for hazardous waste also in place: detergents leftovers,

paints, lamps.

- *More comprehensive use of green suppliers.*

In 2016, the EEB put in place a formal Environmental and Sustainability policy, see statement published [here](#).

Concerning implementation, developments and suggestions for improvements are discussed at the monthly staff meetings. 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.

- *Web-conferencing to be extended to replace some additional face to face meetings.*

Continued to be implemented in 2016.

EN26 Initiatives to mitigate environmental impacts of activities and services

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement to mitigate environmental impacts of products and services.

- *Policy on green and fair trade suppliers to be further developed and applied. Assess credentials of current suppliers. All suppliers to be asked for copy of sustainability policy.*

In 2016, the EEB put in place a formal Environmental and Sustainability policy, see statement published [here](#).

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. A supportive home working policy (typically one day per week) reduces congestion and city emissions.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards significant environmental impacts of transporting products and transporting members of the workforce.

- *EEB transport guidelines to be reviewed.*

The revised travel reimbursement form was adopted in 2014 and further strengthened in 2015. In 2016, the EEB started to monitor its CO2 travel emissions in a more structured way, see above.

The shared bike policy is still in place: bikes on long-term loan to the EEB are available to members visiting Brussels and staff that normally travel to work on public transport for use to get to meetings in town.

4. Human resource management

Having the right people with the necessary skill set, motivation and ability 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 2016

Total staff posts: 37

Employees on full-time contract: 27(23 permanent contracts, 4 temporary contract)

Employees on part-time contracts: 10 (8 permanent contracts, 2 temporary contract)

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 apart from two (based in France) 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 available on the [Career](#) page on the EEB's website.

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 network 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 having 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.

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.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following:

- *An average hours of training per year per employee of 16 hours in 2014, 24 hours in 2015 and 32 hours in 2016.*

The EEB did not have a dedicated staff person in charge in 2016 and due to this staff change and limited financial capacity, the EEB did not have the capacity to deliver on this commitment. Even if no formal training opportunities were offered, the EEB still tried its best to offer informal training opportunities such as thematic lunches (facilitated by EEB Policy Officers) and the annual staff retreat.

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

Once a year (Dec/Jan), all staff have a performance review with their supervisor, which includes the opportunity to discuss career development. Staff also have the opportunity to give and receive feedback in the regular meetings with the supervisor. All performance appraisals were carried out according to plan in 2016. It was also agreed to review the template for the appraisals in 2017 so as to include questions about how the staff perceive the efficiency of the reviews and collect suggestions for improvements.

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, 2016.

Category	Gender %	Nationality - number	Age %
Board	Female: 41% (13) Male: 59% (16)	26 - 29	Under 30: 0 30 – 50: 15 (52%) 50+: 14 (48%)
Senior Management	Female: 60% (6) Male: 40% (4)	6 - 8	Under 30: 0 30-50: 7 (70%) 50+: 3 (30%)
Other staff ³ in Brussels Office	Female: 52% (14) Male: 48% (13)	14 - 30	Under 30:6 (22%) 30 -50: 21 (78%) 50+: 0 (7%)

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 known disabilities.

³ The numbers here refer to the number of individuals who at one or other point during 2015 were staff members, as opposed to the number of staff posts, hence the discrepancy with the figures in 2.8 and LA1.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards composition of governance bodies and breakdown of employees.

- *Annual assessment of diversity (gender, age, nationality).*

See above.

NGO9 Grievance mechanism for employees

We have human resource policies that conform to relevant standards under Belgian law and are in accordance with the values of our organisation in terms of employee and volunteer rights, health and safety at work. The primary mechanisms for staff to raise grievances and get a response is directly with their supervisor or with the Head of Personnel (if different), depending on the nature of the grievance.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards internal feedback and complaints mechanism.

- *Grievance policy to be reviewed.*

The EEB's adopted anti-corruption policy which includes a complaints mechanism is in force and [published on the EEB's website](#). Now that the new EEB website is up and running, the EEB is committed to review the mechanisms for internal grievances and publish relevant parts of the external grievances policy online in 2017.

5. Management of Impacts on Wider Society

SO1 Impact of activities on the wider community

The EEB makes a positive contribution to the wider society through its work for stronger environmental policies throughout Europe and beyond. To mention a few examples: in 2016 our work to protect Europe's biodiversity was rewarded with the Commission's decision not to re-open the nature directives but rather to focus on their better implementation and financing is the most obvious example. The publication of an EEB report on the implementation of the REACH authorisation process was followed by the Commission apparently adopting a more critical approach to authorisation requests and requesting to ECHA to do the same. The EEB's longstanding work on the Aarhus Convention was rewarded with an important breakthrough when the Aarhus Convention Compliance Committee issued preliminary findings, subsequently confirmed, that the EU is not in compliance with the Convention due to the lack of sufficient access to EU judicial procedures for NGOs and the wider public. A very significant and hard-won achievement was the relaunch of Ecodesign implementation work following over 18 months of delay in the publication of the Commission's Work Programme on this. While the collateral impacts arising from our means of working (running an office of 30+ staff, holding a few dozen meetings at European level etc) are negligible by comparison with the impacts that we have on the wider environment and society, we strive to manage these collateral impacts 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?

As mentioned above, in order to prevent the risk of corruption, the EEB Board has adopted an [anti-corruption policy](#).

SO4 Actions taken in response of incidents of corruption.

No incidents of corruption were reported in 2016.

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.

The position on the ethics of fundraising from companies adopted in 2011 continued to be in force. 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. 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 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 its 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 2016 (where the core grant represented 21.6% as compared with 39.6% in 2011).

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 organisation indirectly representing some 15 million individuals (i.e. the members of our member organisations) helps to secure our independence and to ensure that our policy demands have a firm basis in the views of the environmentally aware public.

In the 2014 Gap Analysis submitted as part of the Accountable Now (then INGO Charter) report, the EEB committed to the following improvement as regards programmes for adherence to laws, standards, and voluntary codes related to ethical fundraising and marketing communications.

- *Ethical fundraising policy guidelines to be reviewed with regard to private sector funding.*

The further development of the first draft of these guidelines is still shelved due to a decision to prioritise further efforts to increase foundation funding. It was not felt necessary to address the issue in 2016.