Please find some additional comments below from WWF on the EIB draft Social and Environmental Principles - deadline for comment today.

1. The section on climate change is still quite vague and does not set targets that are commensurate with the expectations one might have of a European institution committed to 30/20% CO2 reductions by 2020. Para 65b speaks about encouraging renewable energies but without a target. I had thought that the EIB had previously made a commitment to 50% of its lending going to the renewables sector.

2. Para 66 speaks about the EIB 'may require promoters to identify and apply appropriate (climate) mitigation measures.' Why is this conditional? By way of contrast, para 24 for example on adverse environmental impacts states: 'The Bank requires the promoter to apply mitigation measures....'

3. Para 42 re World Commission on Dams and Extractive Industry's review. The revised version is still no clearer in WWF's view than the previous version. The phrase in brackets doesn't clarify what the EIB's approach will be. Footnotes 34 and 35 tell us where to look for the WBG and Commission on Dams sites - but how are we to "interpret" the EIB's policy stance in relation to these?

4. Will the EIB promote the Extractive Industries Transparency Initiative since the EITI is a voluntary initiative encouraged by the EU to promote good governance?

These comments are in addition to the ones that I made at the recent public consultation - namely the lack of "urgency" in the Statement regarding climate change considerations and the need of change in the Bank culture that will lead to integration of the environment in decision making and lending. This latter point may require thinking about the Bank's reward structure to encourage personnel to proactively seek out sustainability lending options.

Thank you for taking these comments into account. As I also said at the recent consultation with CSOs, I am pleased with the openness with which the Bank is conducting this exercise and its willingness to listen - and respond - to CSO inputs/.

Sincerely yours

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