

Guidance note to EIB promoters

On environmental and social performance
in EIB-financed operations in response
to the COVID-19 outbreak crisis

Annex 4 – Stakeholder engagement

May 2020



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The unprecedented nature of the COVID-19 pandemic means that all aspects of EIB-financed operations may be impacted by it, including stakeholder engagement. The worldwide social distancing and lockdown measures present a new challenge for active engagement and meaningful consultation with project stakeholders. Notwithstanding these difficult circumstances, the EIB urges its promoters to uphold an open, transparent and accountable dialogue with project-affected persons, communities, and other relevant stakeholders in an effective and appropriate manner.¹

The purpose of this note is to provide **practical recommendations** to promoters on how to conduct stakeholder engagement in EIB operations **in the context of the COVID-19 crisis**. This includes operations that are part of the EIB's COVID-19 response package, new operations that are not directly part of that package and the ongoing operations under implementation.

The guidance note is **non-binding** and is to be used in conjunction with Standard 10 of the EIB Environmental and Social Standards.² It covers solely the aspects that may differ from the usual practice due to the extraordinary situation caused by the pandemic. In case of any inconsistency or conflict between this guidance note and Standard 10 or any of the EIB's other environmental and social standards, **the provisions of the standards shall prevail**. The guidance note may be updated occasionally as the COVID-19 crisis evolves. The promoters are urged to consult regularly guidance from the World Health Organization (WHO), the International Labour Organisation (ILO), the International Organization for Migration (IOM), the United Nations Children's Fund (UNICEF) and other international organisations, as well as the national public health authorities and national governments.

¹ As per the "Aarhus Convention" (*Convention on Access to Information, Public Participation in Decision-Making, and Access to Justice in Environmental Matters*, done at Aarhus, Denmark, on 25 June 1998) <https://www.unece.org/fileadmin/DAM/env/pp/documents/cep43e.pdf>

² [EIB Environmental and Social Standards](#)

1. Determining the nature of stakeholder engagement

The principle of proportionality is to be maintained in the current crisis, i.e. the level of stakeholder engagement should reflect the nature and complexity of the project and its stakeholders, the sector, and the potential environmental and social risks and impacts on individuals, communities and other impacted stakeholders.

Given the pandemic-induced limitations, the more traditional formats for engagement may have to be adjusted in accordance with their context and project stage. The sections below include suggestions for alternative approaches and/or additional features of the key elements of the stakeholder engagement process.

2. Stakeholder identification and analysis

For projects at the preparation stage, promoters are advised to ensure that identification and mapping include all project stakeholders in the given COVID-19 context, especially those who may be differentially positively or negatively affected by the project, or have different engagement needs, because of their vulnerability to COVID-19.

The mapping should include:

- relevant national or local authorities leading or executing the response to COVID-19;
- critical stakeholders involved in delivery of essential services and medical assistance;
- community-based or civil society organisations (including women's groups, community health volunteers, youth associations, religious groups, unions, and groups representing vulnerable segments of the society and/or minorities) that can play a role in the COVID-19 response (information sharing or provision of essential services);
- vulnerable individuals groups, such as migrants, displaced persons and refugees, people living in poverty, those without access to water and sanitation or adequate housing, persons with disabilities, women, older persons, LGBTI persons, children, those living in remote or inaccessible areas, human rights defenders, or women in certain contexts;
- project workforce, including vulnerable people (e.g. migrant or lowly/unskilled workers).³

Promoters should analyse the identified stakeholders' roles and understand their potential status and role in the context of the pandemic, including whether coordination would be needed with some of them. Mapping the various stakeholders based on the degree to which they are impacted by the project, in combination with consideration of their rights, as well as their roles, duties and responsibilities in the COVID-19 context, could help determine subsequent engagement strategies and key messages. In deciding how best to engage with stakeholders, promoters should prioritise directly and indirectly affected stakeholders – especially those affected by physical or economic displacement and the most vulnerable and marginalised people.

Promoters of operations under implementation are advised to review their existing identified stakeholders, with the aim to include any new relevant pandemic-related actors and to confirm any changes in vulnerability status of the previously identified stakeholders.

³ Detailed guidance concerning project workforce on occupational [health and safety](#) as well as [labour](#) conditions aspects is provided in separate EIB guidance notes on these topics.

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3. Engagement planning

COVID-19 related measures, including provisions on how to carry out stakeholder engagement, should be included in project environmental and social management systems, including stakeholder engagement plans as relevant. The promoter's environmental and social management systems should reflect/include any structural or procedural changes to support the implementation of additional, COVID-19 related provisions. Where required, the stakeholder engagement plan should be developed or revised taking into account COVID-19 limitations and impacts on different stakeholders, based on the mapping findings. Engaging with community-based networks and representative organisations such as community and traditional leaders or regional and national associations may be effective in identifying the needs of vulnerable stakeholders and suggesting tailored and localised solutions for the design and implementation of the stakeholder engagement process in the pandemic context, following the new or revised project time schedules.

Generally, the promoters are advised to follow national directives, international good practices and formal advice from WHO in terms of social distancing measures. The stakeholder engagement plans should point out ways to minimise close contact and follow the good hygiene procedures as recommended by WHO and respective national authorities for patients with confirmed COVID-19 or suspected COVID-19 cases in a healthcare setting. Some elements of stakeholder engagement would need to be postponed until social distancing measures are lifted.

Given the emerging human rights challenges regarding public participation and civic space, the engagement planning should identify and address any potential risks of reprisals against anyone expressing their opinion about the EIB-financed project in general and against human rights defenders and environmental activists in particular. This may entail considering further measures for ensuring safety and stakeholder protection in the engagement process, such as seeking a "safe space" for virtual or other types of consultations and safe means of communications through secure channels.

All stakeholder engagement activities should be planned and implemented in a way to prevent and address social stigma and discriminatory behaviours against persons perceived to have been in contact with the virus and against marginalised groups perceived as contributing to the spread of COVID-19. Finally, all information-gathering and sharing activities should comply with the European Union's data protection requirements.⁴

4. Information disclosure

The unprecedented nature of the COVID-19 pandemic combined with available information technology has led to the considerable spread of misinformation about the disease. Promoters are advised to avoid sharing unconfirmed information about the COVID-19 pandemic in any form as it undermines collective efforts in addressing the outbreak and creates new risks. Any COVID-19 related information should come from credible and official information sources such as WHO or national competent authorities.

In order to minimise as much as possible the concerns and stress caused by the outbreak in both the workforce and amongst the general public, the promoter should envisage providing information and regular updates to stakeholders on the different measures, policies and procedures put in place on any emergency preparedness and response activities.

⁴ See more information on the EU General Data Protection Regulation (GDPR) here: <https://eugdpr.org/>

In their information dissemination efforts, the promoters should seek to ensure that reliable, accurate information reaches all, by making it available in readily understandable and culturally appropriate formats and languages, including indigenous languages and those of minorities, adapting information for people with specific needs, including the visually and hearing impaired, and reaching those with limited or no ability to read, or who lack access to the internet and usual media sources.

Besides mailings and manual distribution, information dissemination channels may include:

- *community public notice boards*, displaying up-to-date information on the project and its impacts, and any relevant COVID-19 related information;
- *phone calls and text messaging*, ensuring that accurate and timely information about the project and planned public participation processes reaches vulnerable groups.
- *project website*, updated regularly, including information on the project stages, key contact details, the stakeholder engagement process and grievance mechanism;
- *mainstream media*, such as announcements through newspapers and radio stations; and
- *social media platforms, push news, bulletins and newsletters*, including important information on the project, possible impacts on stakeholders as well as contact information for grievances.

In considering its communication strategy, promoters could consult with government officials, NGOs and leaders or spokespeople of key stakeholder groups to verify whether the formats and methods chosen are suitable given the pandemic context. Promoters are also advised to draw on the lessons regarding outreach from any similar ongoing stakeholder engagement processes in the country.

5. Stakeholder consultation

As the current COVID-19 pandemic-related restrictions and social distancing measures create new challenges for standard consultation practices, the promoters are advised to postpone active engagement with stakeholders should the project calendar allow for that or to explore alternative channels for enabling some form of engagement activities in the short term. If the required consultation process cannot be conducted at a level satisfactory to the Bank, the project may not be financed, irrespective of the limitations of the current context.

In projects for which the EIB requires an environmental and social impact assessment and the consultations are conducted by the authority competent for the decision, the role of the promoter will be to provide support in identifying relevant stakeholders, answering any questions that arise or organising appropriate means and tools for conducting consultations – all adjusted to the pandemic context as described in different parts of this note.

Any chosen alternative channel should enable consultations to be implemented in a way that is sensitive to the local social, cultural and gender norms whilst ensuring compliance with the applicable legislation and EIB Environmental and Social Standards. These may include:

- *soliciting written submissions (either online, or by mail) using a dedicated webpage, mobile phone short message service (SMS) approach or social media (in keeping with the European Union's data protection requirements⁵ while also remembering that not all stakeholders may have the internet or mobile phone access or confidence to use these);*
- *using surveys, either a questionnaire-based survey or in-depth interviews (online or by phone) with identified informants (many professional survey or polling companies have relevant expertise). Anonymity should be offered;*
- *organising virtual meetings which are useful for soliciting inputs from stakeholders where internet access is widespread and where stakeholders are familiar with such online processes;*
- *using telephone, radio or social media, such as Facebook or Instagram, to ensure ongoing dialogue with stakeholders, and the conveying of questions, concerns and complaints.*

The same mix of meetings and other modes of engagement can be used during the implementation stage, especially if and when changes in the project are considered or unforeseen circumstances and concerns about the project arise.

At any project stage, stakeholders must be able to engage freely and without intimidation with the promoters and the EIB in providing feedback and raising concerns. Hence, the safety and well-being of stakeholders remain top priority for the design of engagement activities in times of crisis.

6. Grievance mechanism

People affected by or otherwise involved in project-supported activities, including different types of healthcare workers, should be provided with accessible and inclusive means to raise concerns or lodge complaints via a clearly defined grievance redress mechanism that would be commensurate with the project risks, complexity and scale. Promoters may consider enhancing/modifying or setting up a dedicated grievance process for COVID-19 related issues for project stakeholders.

7. Monitoring and reporting

Given the COVID-19 related challenges, the promoter should review the status of stakeholder engagement relevant to the project, and document any elements that may have arisen, especially regarding:

- any changes to the engagement plans or activities, citing reasons (for example, new stakeholders emerging as vulnerable or significant, events dropped or postponed, engagement formats changed);
- main concerns, differences and conclusions reached as a result of any modified consultations;
- significant difficulties experienced in the engagement process (including allegations and/or incidents of threats and reprisals) and how these are handled;
- lessons learned from the changes in engagement practices.

⁵ See more information on the EU General Data Protection Regulation (GDPR) here: <https://eugdpr.org/>

These, and progress relating to all other stakeholder engagement topics, should be monitored and recorded regularly. Whenever deemed useful and feasible, the promoters are encouraged to use third parties for monitoring the quality of engagement activities such as consultations or grievance mechanisms, such as local and public authorities, stakeholder representatives, civil society organisations, affected communities, think tanks or others familiar with the issues involved in the project.

Additional guidance

- [Meaningful Stakeholder Engagement – MFI Joint Publication](#)
- [A guide to preventing and addressing social stigma associated with COVID-19 – World Health Organization](#)
- [Risk communication and community engagement \(RCCE\) readiness and response to the 2019 novel coronavirus \(2019-nCoV\) – World Health Organization](#)

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