

U.S. Comments on the EBRD's Environmental and Social Policy
May 7, 2014

The United States appreciates the EBRD Management's efforts to update the Environmental and Social Policy (ESP), including both the public consultations and the engagement with its Board members. The United States supports the proposed ESP. There are numerous improvements to an already strong policy. To flag two in particular: Given the importance of climate change, the United States welcomes the several new references relating to climate change, including further studies focusing on climate change when appropriate. The United States also welcomes the inclusion of sexual orientation and gender identity in the definition of vulnerable people, further strengthening the EBRD's inclusive approach to development.

The United States appreciates the EBRD's commitment that the EBRD will not knowingly finance projects that would contravene country obligations under relevant international treaties and agreements, as identified during project appraisal. In the current policy, the corresponding commitment specifically references human rights as among the treaties and agreements covered. It is our understanding that this commitment still covers human rights treaties and agreements, even though "human rights" is not mentioned explicitly in the revised paragraph 8 of the ESP. We welcome the reference to additional studies on human rights, when they are deemed appropriate.

It is important that affected people benefit from EBRD projects. However, there are many different ways for this to be done. The United States encourages the EBRD, its clients, and people affected by its projects, to consider and utilize the best approach for each project.

The United States will continue to look to the EBRD for strong implementation of its safeguard policies, including in such challenging situations as corporate finance projects and situations where activities related to the project are not all financed by the EBRD. In addition, the United States urges the EBRD to support its clients in providing robust information disclosure to affected people on Category B projects.

As the EBRD moves forward in implementing its new policy, the United States encourages the EBRD to increase its engagement with civil society organizations in those areas where such organizations have expertise. For example, the United States believes that some civil society organizations have experience that might be useful in the areas of gender, sexual orientation, gender identity and disability.

Lastly, the United States encourages the EBRD to consider how to incorporate safeguards into ex-post evaluations.