



Thematic



Approach Paper

'From Risk Mitigation to Impact Generation' – The EBRD's Engagement with Civil Society 2020-2026

EBRD INDEPENDENT EVALUATION DEPARTMENT •
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The views expressed herein do not necessarily reflect those of EBRD Management or its Board of Directors. Responsible members of the relevant Operations team were invited to comment on this report prior to internal publication. Any comments received will have been considered and incorporated at the discretion of IEvD.

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Abbreviations

ADB	Asian Development Bank	RO	Resident Office
AIP	Access to Information Policy	SCF	Strategic and Capital Framework
ARC	Audit and Risk Committee	SEE	South-eastern Europe
BCV	Board Consultation Visit	SEP	Stakeholder Engagement Plan
CA	Central Asia	SEMED	Southern and Eastern Mediterranean
CEB	Central Europe & the Baltic States	SSA	Sub-Saharan Africa
CSE	Civil Society Engagement team	TC	Technical Cooperation project
CSDR	Country Strategy Delivery Review	TCRS	Technical Cooperation Reporting System
CSOs	Civil Society Organisations	TOMS	Transition Objective Monitoring System
CSCEF	Civil Society Capacity Enhancement Framework	TMT	Technology, Media and Telecommunications
OECD-DAC	Organisation for Economic Co-operation and Development – Development Assistance Committee	WBG	World Bank Group
EBRD	European Bank for Reconstruction and Development	WPP	Wind Power Plant
ECG	Evaluation Cooperation Group		
ESP	Environmental and Social Policy		
ESAP	Environmental and Social Action Plan		
ESD	Environment and Sustainability Department		
FCAS	Fragile and Conflict-Affected States		
GET	Green Economy Transition		
GEI	Gender and Economic Inclusion		
IFIs	International Financial Institutions		
IEG	Independent Evaluation Group (WB)		
IEVD	Independent Evaluation Department (EBRD)		
IPAM	Independent Project Accountability Mechanism		
LAT	Less Advanced Transition (economies)		
MDB	Multilateral Development Bank		
NGO	Non-Governmental Organisation		
PAP	Project Accountability Policy		
PSD	Project Summary Document		

1. Introduction and Rationale

1. This paper presents the overall approach chosen by the Independent Evaluation Department (IEvD) for the Evaluation of the EBRD's Engagement with Civil Society Organisations (CSOs). The evaluation is part of the IEvD [Work Programme for 2026-2028](#) endorsed by the Audit and Risk Committee (ARC) in September 2025 and approved by the Board in December 2025 ([BDS25-227 \(Rev 1\)](#)). This approach paper sets out the purpose, objectives, the scope, methodology evaluation questions and limitations for the evaluation.
2. As set out in the IEVD Work Programme 2026-2028, this evaluation will assess the extent to which the EBRD's broader engagement with CSOs reflects the Bank's founding principles, strengthens stakeholder confidence, and contributes to inclusive, effective operations.
3. During consultations for the IEvD Work Programme 2026-2028, IEvD heard interest from Board for an evaluation of the Bank's engagement especially from a local and project perspective but also with regards to the processes for public consultation and handling of queries and complaints.
4. Management expressed interest to learn from EBRD's civil society engagement, including lessons for future transition work. As part of the EBRD's new Impact Report the Impact and Partnerships team plans to incorporate results from the Bank's engagement with civil society, however at this stage, aside from the Green Cities Action Plans, reporting is still under development.
5. Civil society is a key partner and building block underlying the EBRD's mandate of supporting transition towards well-functioning market economies in countries committed to and applying the principles of multiparty democracy and pluralism. Civil society is an essential component of economic development and national cohesion, occupying the space between the private citizen and the state, as providers of services, information, advocacy, monitoring and holding governments to account. In conflict affected situations they hold a particularly important role in providing continuity of services.
6. The landscape in which CSOs operate in many countries has evolved during recent years due underlying political shifts which have led to restrictions and a tightening regulatory environment. In many countries laws have been passed to restrict CSOs in terms of freedom of speech, reduction in development agency support and shutting down of USAID, or imposing conditionalities that undermine their mission and operational model. This has shifted the efforts of many CSOs to fundraising rather than carrying out their core functions of representation and voice for citizens and communities, and advocacy for common interests.
7. A broad definition of CSOs tailored to the EBRD's purpose of moving to open market economies and private sector development is provided in the document outlining EBRD's approach to engagement, prepared by the Civil Society Engagement team, entitled [Approach to Civil Society Engagement 2024-2029](#). It is broad enough to encompass groups, organisations, individual activists and opinion makers across 'common interests', which includes for EBRD's purposes,

those representing the private sector such as business development organisations and other socio-economic actors:

‘Civil society is a public space between the state, the market and citizens, in which people associate voluntarily to advance common interests. For the EBRD’s purposes, civil society actors include groups and organisations, such as non-governmental organisations (NGOs), think tanks, social movements, labour unions, community-based organisations, women’s groups, business development organisations and other socioeconomic and labour-market actors, as well as individual activists and opinion makers.’

8. The definition differs from other development MDBs and IFIs in that it includes business organisations that represent the private sector. Differences between this definition and that of other IFIs will be explored in more detail as part of a benchmarking exercise for this evaluation.

9. The definition does not specify human rights or environment groups by name however, EBRD engages with these groups and beyond. They are active through the Independent Project Complaints Mechanism, and policy and risk areas furthering a green and inclusive transition. This definition will be taken into consideration in the evaluation, and the broad definition will be used to encompass different types of common interests within the Bank’s mandate.

10. Upcoming evaluations expected to yield findings in relation to civil society include evaluations of the EBRD’s engagement in Ukraine, the Green Economy Financing Facility (GEFF), a cluster of water projects, and a country level evaluation of Moldova.

11. Key counterparts in management for this evaluation will be from all departments across the Bank on their interaction with CSOs including, the President’s Office and Senior Management, the Civil Society Engagement team (CSE team), Environmental and Sustainability department (ESD), IPAM, Banking, and Impact. The views of the Board will be surveyed to better understand the level of engagement between Board Directors and Advisers and civil society, including engagement through the Annual Meeting’s Civil Society Programme, IPAM and the Access to Information team through the Office of the Secretary General.

12. External reviewers will be invited to comment from Asian Development Bank’s Independent Evaluation Department, European Investment Bank’s Operations Evaluation (EV), and World Bank’s Independent Evaluation Group (IEG).

2. Understanding EBRD's civil society engagement

13. The role of civil society varies considerably across the EBRD regions, playing a crucial role in some regions, whilst being much more limited in others. In the Baltics for example they remain a fundamental driver of national independence, democratic transition, and, more recently, national resilience. In Eastern Europe and the Western Balkans, civil society has also been crucial to the democratic transition, stability, and European integration since 1989. The environment in these regions can be characterised as more pluralistic than in Central Asia and the Caucasus, due their orientation towards the EU.

14. Despite CSOs continuing to enjoy freedoms in some countries where EBRD works (see Figure 1), continuing and more recent political trends across other EBRD regions have led to civil society operating increasingly within a shrinking, restrictive environment, characterized by increased state control, surveillance, and repression of human rights defenders. Organizations face legal hurdles, threats, and violence, particularly in authoritarian-leaning member states, limiting their capacity to influence policy. The environment is still heavily influenced by a legacy of Soviet-era bureaucratic control, now adapted to modern authoritarian methods, which often prioritize state security over the rights of citizens. In many countries, a significant "disconnect" exists between the state and civil spheres, hindering the ability of CSOs to influence policy or effectively represent citizens' interests.

15. Since 2001, new economies have been added to EBRD's regions of operations including Mongolia in 2006 (considered Free by the Freedom House Index 2025) and the economies of the Southern and Eastern Mediterranean in 2012. Tunisia, Jordan, and Morocco, are rated Partly Free, and Egypt is rated Not Free according to the Freedom House Index 2025. West Bank and Gaza were added to EBRD's economies of operations in 2017, also considered Not Free by the Freedom House Index 2025. More recent additions in 2025 include Benin, Cote d'Ivoire and Nigeria (all considered Partly Free by the Freedom House Index in 2025).

16. The variation in intensity of pressure on civil society across the countries where EBRD works, is illustrated by the Freedom House Index ratings, illustrated by IEvD in Figure 1 below.

Figure 1: Heat Map of EBRD countries by Freedom House Index rating 2025

Not Free	Partly Free		Free	
Türkiye & Caucasus Türkiye Azerbaijan	South-eastern Europe (SEE) Albania Bosnia and Herzegovina Kosovo	Ukraine & Moldova Moldova Ukraine	Central Asia Mongolia	Central Europe & the Baltics
Central Asia Kazakhstan Kyrgyz Republic Tajikistan Turkmenistan Uzbekistan	Montenegro North Macedonia Serbia	SEMED Jordan Lebanon Morocco Tunisia	SSA Senegal	Croatia Czechia Estonia Latvia Lithuania Poland Slovenia
SEMED Iraq West Bank and Gaza Egypt	Türkiye & Caucasus Armenia Georgia	SSA Benin Côte d'Ivoire Kenya Nigeria	SEE Bulgaria Romania	Cyprus & Greece Cyprus Greece
	Central Europe & the Baltics Hungary Slovak Republic			

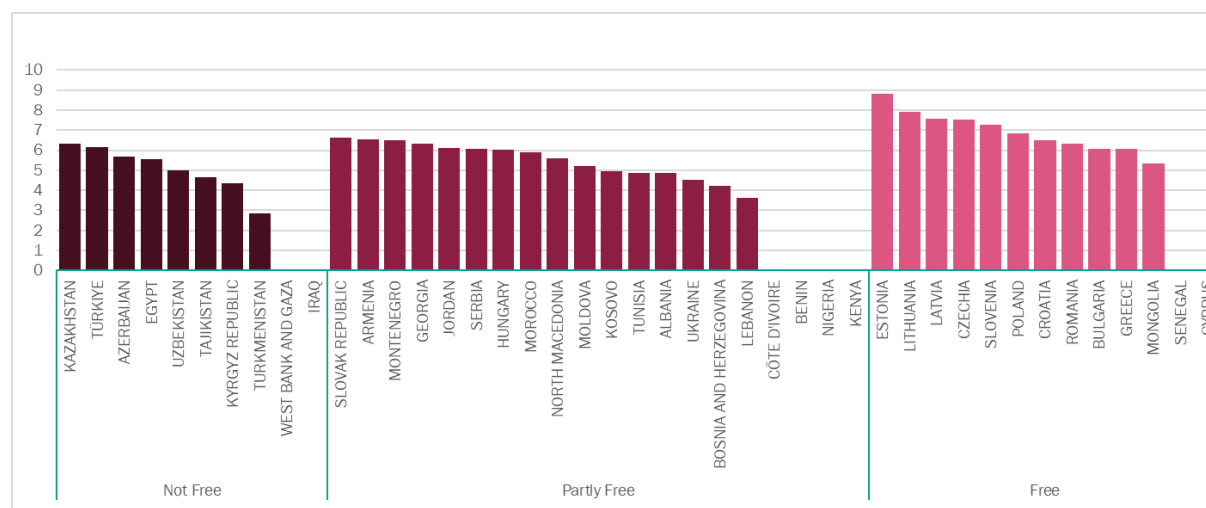
Source: IEvD illustration

17. The evaluation will consider all transition qualities targeted through engagement with CSOs.

This includes for example engagement to support the Inclusive transition quality (activities with CSOs to support equity for women, refugees and minority groups), Green transition quality regarding CSOs working on environmental issues, and Well-Governed quality which may also reflect work with CSOs engaged in improving accountability and transparency in decision making and efforts to combat corruption.

18. The EBRD's Well-Governed transition quality score has relevance to the context for CSO engagement as it reflects country openness to civil society concerns, both at the national, sub-national and corporate level of governance. The overall score is generally consistently higher in free economies and lower in less free economies, although some Well-Governed scores remain higher for economies considered not free on the Freedom House Index (see Figure 2 below). The EBRD's assessment of the transition qualities for Well-Governed shows only partial correlation with the Freedom House Index as it encompasses different measures including for market governance, which go beyond the freedom for CSOs.

Figure 2: Assessment of Transition Quality Well-Governed score 2024-2025 (on a scale of 1-10) for economies where EBRD works, compared with Freedom House Index 2025 rating (Free, Partly Free, or Not Free)



Source: IEvD illustration

19. Since the EBRD began operations in 1991, its political mandate, methodology and assessments for economies where it operates includes the need for an independent and diverse civil society sector with adequate opportunities to engage. This forms part of alignment with Article One of the Agreement Establishing the EBRD, which states that it operates in countries “committed to and applying the principles of multiparty democracy, pluralism and market economics.”¹ Political assessments are revised every five years for new country strategies, and developments are reported on annually through Country Strategy Delivery Reviews (CSDRs).

20. The purpose of civil society engagement at EBRD is to support Article One of the EBRD’s mandate, support implementation of the Environmental and Social Policy, promote transparency and good governance through the Access to Information Policy and foster collaboration through the Civil Society Capacity Enhancement Framework.² The Independent Project Complaints Mechanism (IPAM) also serves as a channel through which CSOs can submit their grievances and complaints related to EBRD-invested projects and activities.

21. The Civil Society Engagement (CSE) team was set up in 2001 to facilitate dialogue between EBRD and CSOs and enhanced internal collaboration on outreach. The CSE team followed a Roadmap 2017-2020 and is currently implementing a new [Approach to Civil Society Engagement 2024-2029](#), with a vision to move EBRD’s approach from one of ‘risk mitigation to impact generation’. Figure 3 below shows a timeline of the key stages of evolution of civil society engagement at EBRD.

¹ [Basic documents of the EBRD](#)

² <https://www.ebrd.com/home/work-with-us/ebrd-and-civil-society.html>

Figure 3: Timeline of civil society engagement at EBRD



Source: IEvD illustration

22. The CSE team supports and facilitates engagement according to the [Approach to Civil Society Engagement 2024-2029](#) and procedures, supporting the Board, Client Services Group and Risk Group in implementation.

23. The EBRD's civil society engagement is currently addressed in the [Approach to Civil Society Engagement 2024-2029](#) and referenced in key EBRD policies and strategies. These include: the Access to Information Policy, Environmental and Social Policy, the Project Accountability Policy, Political Assessments, and Country Strategies.

24. The Bank-wide Project Accountability Policy, Access to Information Policy, Project Accountability Policy and Environmental and Social Policy 2019 set out the need for civil society engagement according to the Bank's mandate (see Figure 4 below). They imply shared roles and responsibilities for civil society engagement which are distributed throughout the institution, due to the importance attached to stakeholder engagement across policies and strategies.

Figure 4: Key EBRD mandate and policy considerations for CSO engagement (developed by IEvD)

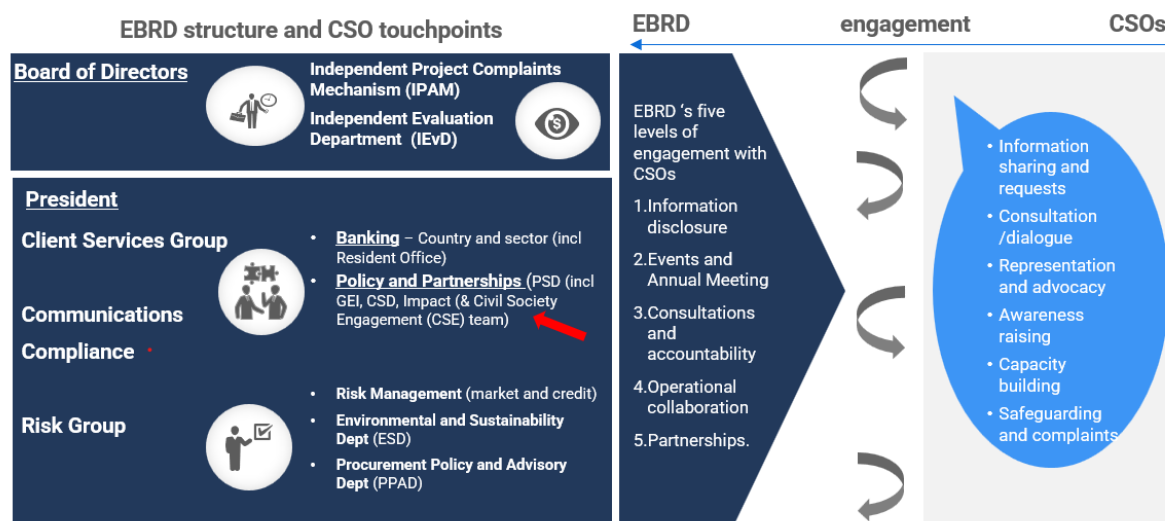
Source: IEvD illustration

25. The EBRD's engagement with civil society happens across the Bank and via different channels and functions. These include through the Board, IPAM and IEvD at Annual Meetings, during Board Consultation Visits (BCVs), Board Adviser Visits, and in correspondence, through IPAM when CSOs raise project complaints, through IEvD when conducting evaluations, through the Banking teams and Resident Office staff on the ground, and the Risk Group's Environmental and Sustainability Department (ESD) for screening risks that may impact civil society resulting in Stakeholder Engagement Plans (SEPs) and other risk mitigation measures (see Figure 5 below).

26. IEvD meets with relevant local CSOs during implementation of evaluations, for example as part of evaluations of policy dialogue, country level, gender and project evaluations.³ Some examples include EBRD's engagement with CSOs to combat corruption, for promotion of gender equality and business associations representing the interests of local business communities and SMEs. Evaluations also identified the challenge of gathering input from CSOs in countries where CSO freedoms were more limited.

³ "Moving wheels of change" – An evaluation of the EBRD's policy dialogue performance and results (2017-2023)
Egyptian National Railways Restructuring and Gender Phases I & II
Moving the needle? The EBRD in Uzbekistan (2017-22)
Evaluation of EBRD's support of Gender Equality – Phase 1 (2017-2021)

Figure 5: EBRD structure and touchpoints for civil society engagement – developed by IEvD - 2026

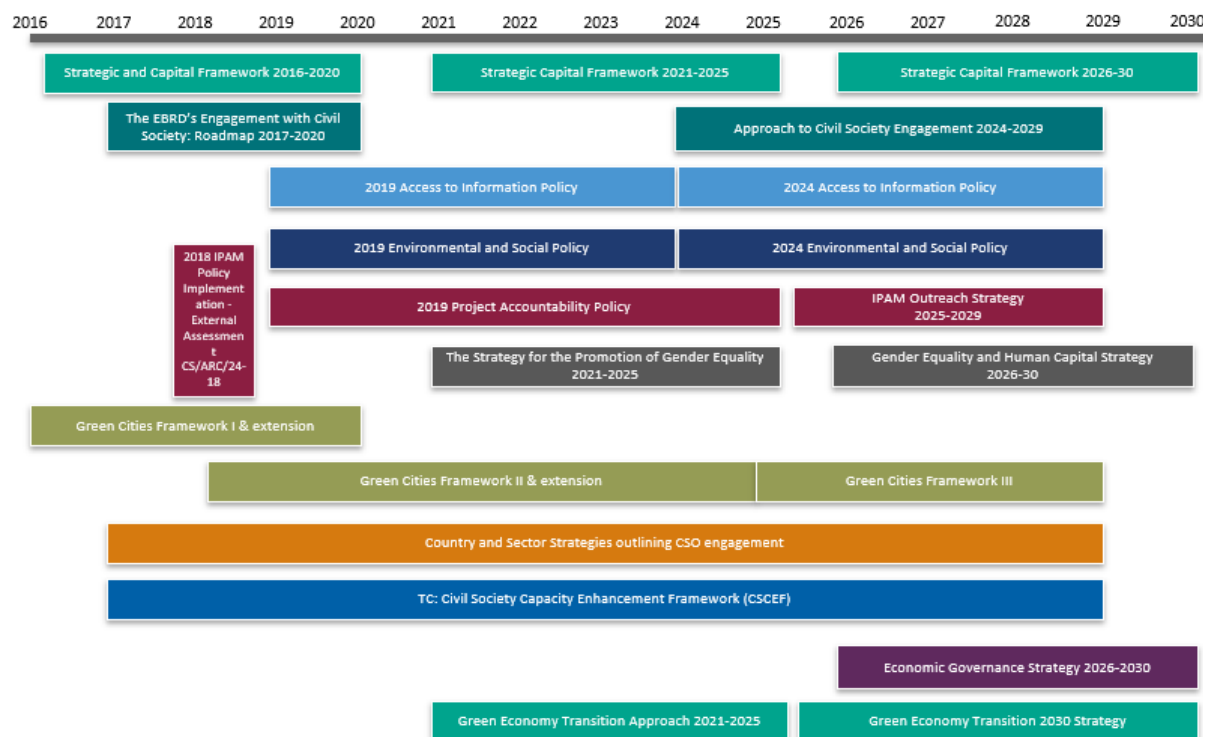


Source: IEvD illustration

27. Public consultation with civil society on the development of new strategies and policies is conducted by CSE team, in coordination with the relevant PSD team, during preparation of diagnostics for country strategies, and formal public invitations to comment. Finally, through Impact and Partnerships, the Impact report aspires to report on civil society engagement through the results reporting system following upgrades taking place in 2026. These main institutional mechanisms for engagement, including senior management roles is set out in Annex 1.

28. EBRD's civil society engagement is conducted through multiple strategies and policies in addition to a specific approach (see Figure 6 below). All these strategies will be considered and reviewed for this evaluation, specifically those that were approved/ operational within the evaluation timeframe of the last six years to the present (2020 to 2026) and those relevant to shaping future work.⁴

⁴ IEvD is including 2026 to ensure that it encompasses public consultations of strategies undertaken during 2026 once complete. This includes the Country Strategy for Tunisia for example.

Figure 6: Timeline of EBRD approaches and strategies to Civil Society Engagement 2017-2030

Source: IEvD illustration

29. **Evaluations of civil society programmes have been conducted at other organisations, but not at the EBRD, highlighting a gap in the area, particularly as EBRD starts operations in Sub Saharan Africa (SSA).** Evaluations of civil society engagement at other multi-lateral development banks (MDBs) and international financial institutions (IFIs) include those conducted by Directorate-General for International Partnerships (DG INTPA) of the European Commission (2020), IDEV for African Development Bank (2021) and IEG for World Bank (2018). In 2025 the World Bank revised its approach to engagement following a strategic review, this will also be taken into consideration.

30. **Past EBRD IEvD evaluations provide some information about civil society engagement.** This includes the [Evaluation of the EBRD's Policy Dialogue Performance and Results 2017-2023](#) – Report, which included interviews with civil society including business associations, investment councils and organisations for transparency, environment and health and safety. Other evaluations which include a review of EBRD work with civil society includes the IEvD [Country Level Evaluation EBRD Activities in Montenegro 2017-24](#), the [Country level Evaluation in Uzbekistan](#) (2017-2022) and [EBRD Green Cities Programme interim evaluation \(2016-2021\)](#). Some findings on the relationship between the public and private sector are also evident from the IEvD [Evaluation of the EBRDs Digital Approach](#), through interviews with business associations and techno parks.

31. **The SCF 2026-2030 expects that engagement with civil society will continue to be enhanced to strengthen strategies and project implementation and will strengthen EBRD's transition impact.** This evaluation will provide findings and evidence to help implementation of this ambition

where enhanced engagement should “supporting the Bank’s strategic and operational objectives, as well as increasing transparency through public dialogue and the accountability of public bodies.”

32. Future strategies emanating from the SCF 2026 elaborate briefly on the role of civil society engagement include the [Green Economy Transition Strategy 2030](#), the upcoming Gender Equality and Human Capital Strategy 2026-2030, and the upcoming Economic Governance Strategy 2026-2030 (see Figure 2 above).

33. The upcoming Economic Governance Strategy 2026-2030 emphasises the importance of civil society organisations as key partners for implementation (Chapter 3.12), elevating EBRD’s governance work involving civil society engagement, *‘helping to promote the Bank’s investment, policy dialogue and advisory activities in the economies where it operates, and establishing accountability and public support for Bank activities.’* Critically it states in 3.9 that by working with civil society partners, the EBRD ensures that its reform-focused interventions are well targeted and correctly designed, drawing on complementary expertise and resources, and avoiding duplication of effort.

34. Looking forward, where this evaluation may provide useful findings and lessons for implementation, the upcoming Gender Equality and Human Capital Strategy 2026-2030 calls for **enhancing constructive collaboration with CSOs**, not only in the context of project execution, but also in terms of broader policy dialogue and advocacy.’ It highlights the importance of capacity building work and collaboration including through the CSO Steering Committee to enable closer cooperation on human capital and women’s empowerment.

35. This evaluation may provide insights to help implementation of the new [Green Economy Transition Strategy 2030](#) which promises to deepen partnerships including with civil society to **address complex delivery challenges**. In the context of GET 2030, to support the EBRD’s investment, advisory and policy dialogue efforts, the Bank will continue to enhance local CSOs’ capacity to promote energy efficiency, climate resilience, sustainable transport, biodiversity and other related issues.

3. Evaluation methodological approach

3.1. Objective and Scope

36. **The overarching objective of this mid-term evaluation is to provide evidence based evaluative insights and lessons, to the Board, Management and wider public about the extent to which the EBRD's engagement with CSOs is relevant to the intentions set out for civil society engagement in strategies and policies.** This includes the strategic direction set out in the CSO approach, and the extent to which the engagement is leading to increased impact towards transition on the ground. It will also look at how engagement reflects the Bank's founding principles set out in the Bank's mandate, how it strengthens stakeholder confidence and reduces risk of harm, as set out in the Bank's risk policies, and contributes to more inclusive, effective operations.⁵

37. **Findings and lessons are expected to enhance the delivery of the existing [Approach to Civil Society Engagement 2024-2029](#), for future strategies. and to provide input into engagement in less advanced countries and in the new region of operations, Sub-Saharan Africa.** It will also inform external stakeholders about the strengths and weaknesses of the EBRD's approach. Findings may also contribute to the next Approach Civil Society Engagement due in 2030.

38. **As mentioned above (para 22, 24 and 25) the evaluation will provide insights and lessons to help the implementation of the SCF 2026-30** where civil society is expected to contribute to transition impact, to the implementation of the upcoming Gender Equality and Human Capital Strategy 2026-2030 to enhance collaboration with CSOs and towards the upcoming Economic Governance Strategy 2026-2030 to help improve public support, accountability and to improve design and targeting of reform measures.

39. **The scope of the evaluation will cover the most recent operating period of 2020 to 2026 (the present).** That is particularly complex since it includes: 1) the increasingly restricted environment for CSOs preventing freedom of expression, 2) the context of the pandemic, war on Ukraine and shifting political dynamics; and 3) four years in which there was no guiding approach after completion of the EBRD's Engagement with Civil Society Roadmap 2017-2020 and will then include the first two years of implementing the [Approach to Civil Society Engagement 2024-2029](#).

40. **The evaluation covers all engagement with CSO across different levels of the Bank, from the project level through investment operations to the strategy and corporate level.** This means case studies will look at the local level experience of engagement through specific banking and technical cooperation projects involving CSOs, in particular through client-led Stakeholder Engagement Plans (SEPs) as part of higher risk investment operations to fulfil ESR 10, and direct capacity building (including non-transactional) technical cooperation (TC) support to CSOs delivered through consultants engaged by EBRD.

⁵ IEvD Work Programme 2026-2028

41. This evaluation will not cover IEvD's own engagement with CSOs, to avoid conflict of interest. This forms part of the overall independent review process of IEvD looking at all its activities, and independent evaluation of IEvD.

3.2. Evaluation questions

42. The overarching evaluation question of this evaluation is:

To what extent did EBRD's engagement with CSOs contribute to strengthening transition impact, while maintaining EBRD's accountability and transparency to shareholders and ultimately the public through established governance mechanisms?

43. Specific questions are set out in the three boxes below.

Evaluation Question 1 (Relevance & Coherence): To what extent is EBRD's engagement with CSOs in the country context relevant to its strategic objectives for transition, and policy commitments; and how coherent is it with the efforts of other MDBs/IFIs?

The purpose of this question is to identify the adequacy of EBRD's civil society engagement activities in the country context to deliver the impact and accountability objectives set out in CSO Roadmap, the current Approach, policies and strategies past and present. It also looks at the extent to which the EBRD's engagement with CSOs is relevant to the broad SCF 2021-2025 objective of delivering transition impact. This will help determine the strengths and limitations of the potential contribution of CSO engagement to impact.

It involves a review and mapping of the context of CSOs in each country to identify those engaged in activities relevant to the EBRD's activities and comparison of these with the reach of EBRD's actual engagement.

It also looks at how the interaction with CSOs has been actioned as reflected in strategies, policies and processes and whether the target group of CSOs has evolved over time.

The review will highlight strengths and identify any gaps in CSO engagement to fit the purposes of the country strategies, CSO approach, thematic strategies and policies, and take into consideration the impact of the varying political and economic contexts in which civil society operates.

The evaluation question also involves comparative analysis of EBRD's approach to civil society engagement with that of other MDBs to identify areas of commonality and difference. The analysis will examine the strengths and weaknesses of other approaches, including findings and lessons from previous evaluations conducted by other MDBs.

Evaluation Question 2 (Outcomes, Impact & Sustainability): What outcomes and impacts have EBRD's CSO engagement had and how sustainable are the results?

This evaluation question addresses the outcomes and wider impacts of CSO engagement, as set out in the recreated theory of change in Annex 3, by looking at evidence of results from country case study reviews of specific EBRD engagements through project investments (and any available self-assessments) and through direct technical cooperation (TC) support, complemented by a review of CSO perceptions of EBRD in media and through a survey of CSOs across all countries.

The evaluation will examine civil society engagement in connection to investment projects in case study economies to look for causal effects of the engagement and assess the extent to which it led to enhanced transition impact. It will entail examining the results and impact of civil society engagement as part of projects, including both completed projects and projects signed and under implementation (listed in Annex 3, and other relevant projects involving engagement as determined during the evaluation).

The review will use project monitoring and reporting documentation, web searches, site visits, interviews with CSOs, clients, EBRD staff, other MDBs/IFIs and partners to identify where civil society engagement may have had impact beyond the direct results. This will be supplemented by consulting publicly available data showing evidence, for example of market growth, improved job opportunities for women or youth, protected communities or a green transition through reduced carbon emissions, protected eco-systems, reduced pollution or health and safety hazards. Other areas of impact may include advances to reduce corruption or fair and transparent procurement systems. Impact will also be assessed by reviewing any broader changes resulting from such engagements including mobilisation of public and private investment, regulatory changes or increases to investment in surrounding areas brought about as a result. The review will also look at the results and impacts of capacity building TC projects with CSOs in case study countries as listed in Annex 5, in the context of the specific areas covered by the recipient organisations.

Direct evidence of results from case studies (interviews and bank reporting) will be compared with available data from the wider survey of CSOs, media and other external sources. The question will also look at the extent to which the impact is sustainable, or if it is subject to rapid shifts in public opinion as priorities change. It will also examine how EBRD governance of its CSO engagement, accountability and transparency mechanisms promote or hinder impact generation.

As an extension of the mapping exercise of CSOs for EQ1, a survey of these CSOs will also deliver perceptions on EBRD's performance with regards to the quality and impact of engagement at the local level (including those within affected communities of investment projects), and of stakeholders, to understand the extent of EBRD's accountability and transparency.

Evaluation Question 3 (Efficiency): How well has EBRD deployed existing resources to engage with civil society towards EBRD's increased impact and accountability, and how transparent and efficient is the EBRD as perceived by CSOs?

This question will appraise how efficiently EBRD has deployed resources including staff and donor resources to support civil society engagement, both toward delivering transition impact and to ensure EBRD's accountability, transparency and risk mitigation. It will also look at the systems and structures in place to ensure consistency in civil society engagement across the EBRD including across the Board, IPAM, President's Client Services Group (including Banking, ROs, Policy Strategy and Delivery, Civil Society Engagement team) and Risk Group (ESD), as set out in Figure 5. Areas of review will include remit, roles and responsibilities, training and expertise. The learning dimension will also be examined to see how responsive it has been to crises and other events.

The question will also involve a review of current incentive mechanisms including the transition impact methodology indicators for civil society engagement as a framework for measuring impact as part of investment projects.

3.3. Evaluation methodology

The following section sets out the methods for the evaluation including the systems-based approach to address the complexity of the topic, an indicative reconstructed theory of change to underpin the objectives of civil society engagement at EBRD and the criteria for selection of case studies.

3.3.1. Systems-based approach

44. **The evaluation will take a systems-based approach to address the complexity of engagement by understanding the relationships and interdependencies between different components of the eco- system for civil society engagement, and how they work together to achieve the overall goal of moving from risk mitigation to impact generation.**

45. A **systems-based approach** in evaluation is an approach for assessing **complex interventions** by examining the **whole system** in which they operate—focusing on the **relationships, interdependencies, feedback loops, and interactions** among system components (actors, institutions, policies, processes, and context) and how these jointly shape outcomes, rather than treating the intervention as a simple linear cause-effect chain. In practice, it typically involves **mapping system components and relationships**, incorporating **multiple stakeholder perspectives**, and—where feasible—tracing **causal pathways/relationships** to understand where and why engagement or change worked better (or less well) across the system.

46. For example, country strategy development is connected to the activities and projects EBRD carries out on the ground, and policies and strategies shape activities and behaviours. Board and Presidential engagement can impact public perceptions both across all regions and locally about how the EBRD considers the feedback from civil society. An evaluation review will look at whether the voices of CSOs EBRD engages with are representative of local concerns.

47. A key principle within a systems-based evaluation is incorporating stakeholder perspectives into the evaluation. This will be achieved through direct engagement with CSOs, through surveys, interviews and focus groups. Further perspectives on the effectiveness including the results and impact of the engagement will be gathered from media perceptions and sentiment analysis of CSOs on public forums. Perspectives will also be gathered from government policy counterparts on CSO engagement.

48. Systems based evaluations involve mapping of the complexity and relationships, and to this end the evaluation involves a mapping of CSOs at the local level, and of engagements. It will also attempt to map causal pathways and relationships where possible to identify where engagement worked better and where it was less successful, to identify possible lessons.

49. This evaluation follows ECG good practice standards for conducting a thematic evaluation, and the OECD DAC framework criteria of Relevance, Coherence, Effectiveness, Efficiency and Impact and Sustainability. The evaluation questions focus on relevance & coherence, effectiveness, impact and sustainability (results) and efficiency of use of resources for engagements with civil society. The contribution towards transition is a priority for this mid-term evaluation.

50. To answer the evaluation questions, in addition to the systems-based approach outlined above, a participatory approach will be adopted whereby stakeholders will be actively involved throughout the evaluation process, through surveys, interviews and focus groups, and through which real time learning and feedback can take place.

51. Finally, a mixed methods approach will also be used, involving qualitative and quantitative data analysis, where available.

52. Evidence will include both primary and secondary information collected from internal Bank documents and data records, Board documents, surveys of the Board and Banking staff, and from external sources including surveys of CSOs, interviews with other MDBs, a review of relevant past evaluation work, web searches and in the case of in-depth country case studies, and interviews with key civil society counterparts and stakeholders. Country case studies will also involve focus group sessions with CSOs where this approach may gather useful findings from discussion of key concerns.

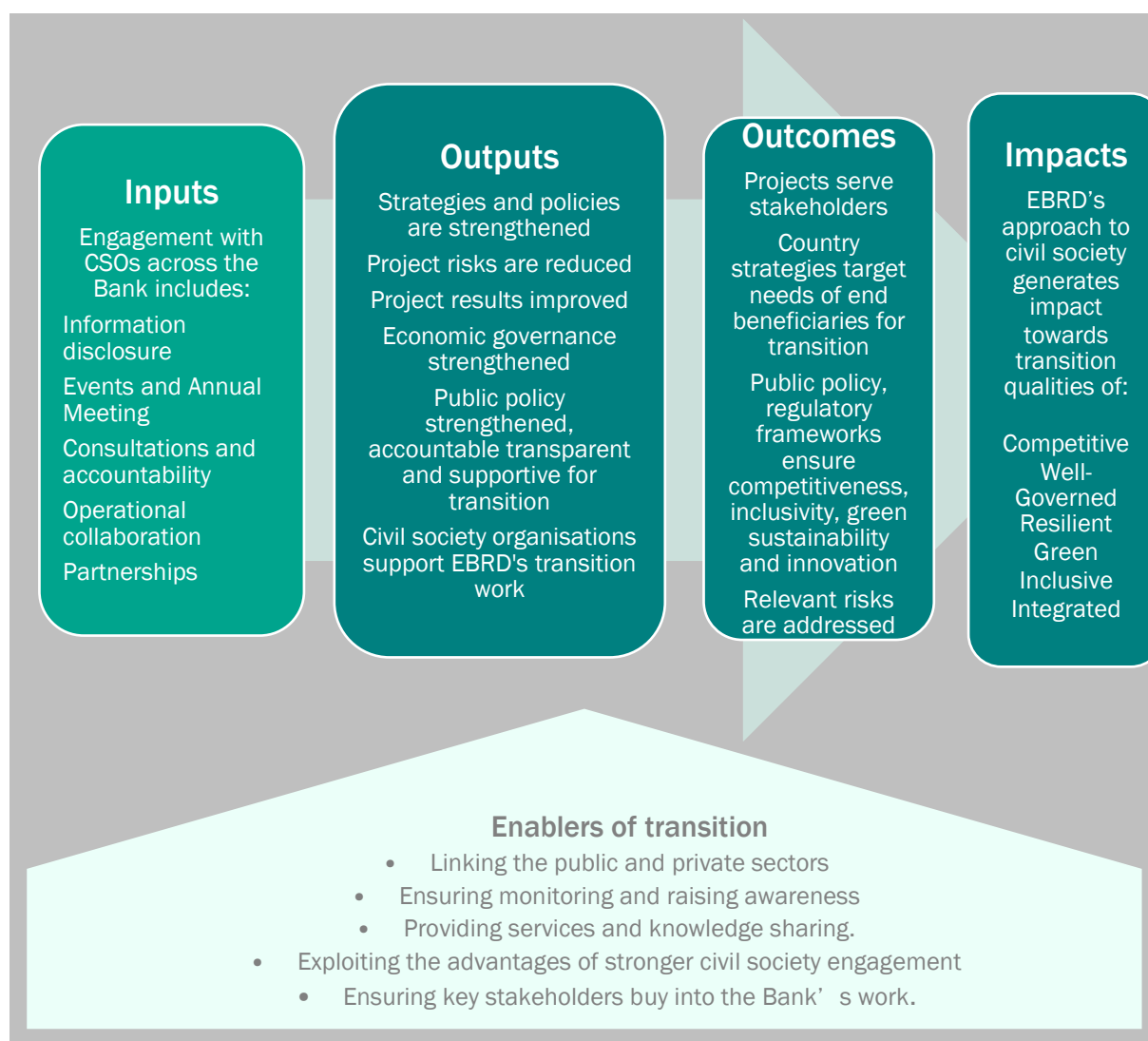
53. An evaluation matrix has been created to guide delivery and shows the criteria used to answer the evaluation questions and the evidence that is needed (see Annex 2). Evidence will be triangulated using different sources wherever possible to check the veracity of information.

54. The evaluation aims to help the Bank to extend EBRD's CSO engagement going forward, and provide organisational learning opportunities, encourage a results-based approach and the use of lessons and findings for learning during implementation of the remaining period of the CSO Approach (2024-2029). It will provide an assessment of the strengths and weaknesses of engagement over the last seven years and recommendations moving forward.

3.3.2. Evaluation Theory of Change

55. A reconstructed broad theory of change outlining the EBRD's approach to CSO engagement is outlined below. This theory of change has been developed by IEvD following a review of relevant materials related to civil society engagement. It may be amended during implementation of the evaluation as needed.

Figure 1 Illustrative reconstructed theory of change (indicative)



Source: IEvD illustration

56. This broad theory of change provides a compass for the evaluation and illustrates the potential results and impact expected from CSO engagement from across the EBRD and across all economies in which EBRD works.

3.3.3. Evaluation methods

57. **The evaluation will take a mixed-methods approach to gather qualitative and quantitative evidence on civil society engagement from the local level, country level and at the broader institutional level.** To analyse and evaluate engagement at the local level, the evaluation will include case studies from the Bank's main regions of Central Europe and Baltics, Central Asia, the Southern and Eastern Mediterranean (SEMED), South-eastern Europe (SEE), Türkiye and Caucasus, Ukraine and Moldova. The evaluation will follow three focus areas:

58. **The first focus area:** CSOs at the local level: mapping, survey of CSO type, level and mode of engagement with EBRD and partnerships. It will involve original data collection to evaluate the relevance of engagement topics and modes, and analysis of CSO engagement with EBRD via external sources, compared with EBRD records of engagement, including impressions of EBRD staff. It will also involve conducting a survey of the approach of other MDBs/IFIs compared to the EBRD.

59. **The second focus area** involves thematic deep dives at the country level and operationalising of engagement with civil society. It will look in depth at the key thematic areas of Green, Resilience, Economic Governance, Inclusion, Digital and the link between public and private sector. It will address EBRD's approach at the local level and evaluate the contribution and results of EBRD's engagement with CSOs towards the achievement of transition impact. Evaluation question two looks at the results achieved towards these.

60. **The third focus area** is EBRD accountability, transparency and EBRD governance of CSO engagement (including information disclosure, consultations, Annual Meeting). This focus area is captured in Evaluation Question One and Three, on the level of input of CSOs during the public consultation process to country strategies, and into stakeholder engagement plans for operations, project summary document disclosures, and the design of the Civil Society Engagement Programme for Annual Meetings and agendas for Board Consultation Visits with CSOs. It also covers the complaints brought by CSOs via the IPAM.

61. **Key counterparts in management for this evaluation will be from across the Bank including, the Civil Society Engagement team, Environmental and Sustainability department, IPAM, Banking, Impact.** The views of the Board will be surveyed to better understand the level of engagement between Board Directors and Advisers and civil society, in addition to the Annual meeting Civil Society Programme. The President's Office will also be consulted.

62. **Part of the evaluation involves surveying other MDBs/IFIs to carry out comparative analysis, to better understand whether EBRD's approach to CSO engagement is coherent externally, and as to whether it reflects a mutual reliance.** It will also provide a benchmark for measuring the

extent and quality of EBRD's CSO engagement. This may help feed into the development of indicators for civil society engagement within the TOMS 2.0 system.

3.3.4. Selection of countries for in depth case studies

63. The evaluation will consider CSO engagement in all regions in which EBRD operates, with evidence enriched by group of three focus countries to support the findings across the key themes of resilience, economic governance, green, inclusion and digital. Selection of case study countries will lean towards to less advanced transition (LAT) economies where lessons may be gleaned for newer countries of operations in SSA. In depth reviews will be supplemented by brief reviews of engagement in a further five countries, where less engagement has taken place, but where evaluation may yield useful findings.

64. Case study deep dives will cover all types of CSO engagement and evaluate the relevance, results and efficiency of these engagements, rather than the performance of whole investment operations or teams within the Bank. CSO engagement includes that conducted as part of investment projects, standalone technical cooperation, and the development of EBRD's strategies and policies. The evaluation will also include correspondence with CSOs such as access to information requests and responses to issues raised and complaints.

65. Case study evidence will be used to provide findings, insights lessons and recommendations from different country contexts and to provide evidence of results on the ground at the local level rather than to make generalisations without wide evidence base. Broader institutional wide findings will only be possible where supported by evidence from the whole Bank and CSO surveys and the collection of evidence from the corporate level, from across the Bank.

66. The evaluation will feature case study evidence with a particularly focus on three countries, Uzbekistan, Mongolia, and Croatia chosen for being those that have CSO engagement through projects and which lend themselves to yielding learning from both experience and challenging contexts. To ensure a representative sample of the regions and types of countries according to the criteria specified below, supplementary countries will be included for a briefer review, namely: **Türkiye, Ukraine, Armenia, Jordan and Egypt**. Selection criteria are detailed in Annex 8 and split into external and internal categories.

67. External criteria include examples of least advanced (LAT) and conflict affected economies, coverage across regions, countries that are ranked more and less free for civil society by the Freedom House index, those that have either increased or decreased the freedom for civil society in recent times, smaller countries where EBRD impact is likely to be more visible, and countries that have received less attention in recent evaluation work by IEvD. The World Justice Project Rule of Law Index is also considered.

68. Internal criteria cover Board members expressed specific interest, the extent of EBRD's civil society engagement, the presence of clear examples for review, and whether a Board Consultation Visit (BCV) is taking or has taken place, providing efficient access to CSOs and valuable input for the evaluation.

69. The following selected countries were chosen for an in-depth review, these are among the Least Advanced Transition economies:

Uzbekistan, representing a country in the region of **Central Asia**, resumed EBRD operations in 2017 after a decade long freeze, and is considered Not Free by the Freedom House Index, is considered one of the Least Advanced Transition countries where EBRD works, but it has higher intensity of EBRD engagement with Civil Society, as shown by the number of projects with Stakeholder Action Plans (Annex 4). A Board Consultation Visit is taking place in 2026, including with CSO representatives. IEvD conducted a country level evaluation of EBRD's activities in Uzbekistan covering 2017 – 2022. Since 2016, civil society in Uzbekistan has transitioned from a period of near-total suppression to a more active, though state-guided, role in the country's evolution. Civil society organisations number around 9,000 (registered) and now act as a bridge between the state and citizens, contributing to service delivery, anti-corruption efforts, and the professionalization of public oversight.

Mongolia, a country of **Central Asia** which will be considered as a benchmark for countries considered **Free** by the Freedom House Index, is one of the Least Advanced Transition countries where EBRD has both energy and transport investment projects with stakeholder action plans. There are no project complaints, and IEvD has not evaluated work there recently. Civil society in Mongolia is a growing, active, and "vibrant" force that emerged following the 1990 democratic transition, with an estimated 34,000 civil society organizations (CSOs) (including NGOs) reported as of 2025.

Croatia, representing Central Europe and the Baltic States, and an EU country, is considered Free by the Freedom House Index. More recently the civic space is narrowing with limited funding and increasing challenges. A Board Consultation Visit took place in 2026.

70. Additional countries chosen for a briefer desk-based review to provide comparative evidence from different contexts which spans a more representative sample of economies where EBRD works include Türkiye and Egypt, and three conflict affected states: Ukraine, Armenia, Jordan as follows:

In **Türkiye**, CSOs make crucial contributions on key challenges facing the country, notably in the areas of education, female workforce participation, awareness-raising regarding ethnic and social tolerance, and support for refugees.⁶ It is considered Not Free by Freedom House Index. The uncertainty of the legal status of different CSOs such as platforms, initiatives, social enterprises and networks can create various legal and administrative problems. The European Union provides significant funding and technical assistance, supporting initiatives focused on democracy, fundamental rights, and civil society dialogue. Limited domestic funding and potential restrictions on international funding hinder operational capacity.

⁶ EU Turkey Report 2019

Whilst considered more advanced, **Ukraine** is the priority in the Strategic Capital Framework (SCF), and is a **conflict affected state**. IEvD is conducting an evaluation in 2026 on EBRD's engagement in **Ukraine**, and information on CSO engagement will be gathered as part of it.

Egypt, a SEMED country, has over 35,000 CSOs operating in areas like climate change adaptation, biodiversity, and community empowerment. Law limits their activities to those aligned with state development policies. Previous IEvD evaluations have covered joint work with CSOs for empowerment of women, and EBRD has multiple energy projects underway.

Armenia, in the Caucasus, is currently engaged in the EBRD's Middle East Crisis Response (MECR) due to the war and is conflict affected sharing a border with Iran and Azerbaijan. It is considered Partly Free by the Freedom House Index, and one of the Least Advanced Transition economies. EBRD has engaged with civil society through a project complaint and has a stakeholder engagement plan for a road project. Particularly following the 2020 war and the 2023 refugee crisis CSOs are advancing democratic reforms, fostering government accountability, and providing essential services.

Jordan, in SEMED, is currently engaged in the EBRD's Middle East Crisis Response (MECR) due to the war and is conflict affected. It is considered Partly Free by the Freedom House Index, is considered one of the Least Advanced Transition economies where EBRD works. There are two EBRD projects with stakeholder action plans within the evaluation period, in the municipal infrastructure and energy sectors. EBRD has also provided technical support to build capacity of CSOs, particularly for the restaurant industry and solid waste, also for sustainable energy. CSOs in Jordan are frontline service providers, bridging gaps in public service delivery, and advocating for marginalized groups. While their numbers have grown significantly, especially during the Syrian refugee crisis, their influence on policy formulation remains limited.

71. Evaluative evidence will be collected from each country case example to answer the question on results of civil society engagement towards the themes of transition with a private sector focus: resilience, economic governance, green, inclusion and digital.

72. The case studies will also contribute evidence towards evaluation question one on coherence with the engagement of other MDBs, through direct interviews with local staff, and question two about the impact of specific civil society engagement activities conducted by EBRD.

3.4. Challenges and mitigating actions

73. This is the first evaluation of the EBRD's civil society engagement, and it presents some challenges that need to be understood and mitigated.

74. Firstly, a risk of evaluating EBRD's engagement with CSOs in countries that have greater restrictions on their freedoms is that they may not be able to speak with IEvD freely or express

their views generally via surveys or focus groups, due to fear of retaliation. To mitigate this, IEvD plans only to evaluate engagements relevant to its investments and to engage with organisations within the laws and regulations that apply in the relevant countries. It will also factor in these limitations and the country context when making an appraisal based on available evidence.

75. Secondly, the EBRD's Approach to Civil Society Engagement 2024-2029 was not Board approved and has therefore not been subject to specific discussion and endorsement that applies to strategies policies and approaches subject to Board approval processes. It has been in operation for two years, and hence the results of activities introduced by it will still be limited. The evaluation will instead look at how the Bank's engagement is evolving, and with whom and what impact that is having on achievement of transition.

76. The EBRD's Approach to Civil Society Engagement 2024-2029 will inform the theory of change (Figure 7) and design matrix (Annex 2), and mid-term findings will check that it is on course, but the approach will not be subject a full evaluation as it is not substantially implemented.

77. Thirdly, detailed information about engagement with civil society is held by teams across the Bank and is currently not reported on systematically as a whole. Information on engagement is held by staff and on systems in Banking and non-Banking, Resident Offices, Board Constituency Offices, IPAM and externally with clients and consultants,

78. To mitigate the limited or lack of detailed reporting on civil society engagement (see Annex 7 for main available resources), IEvD will need to supplement desk reviews of various databases, and through data requests with various teams, with interviews with CSOs, consultants, and staff.

79. Fourthly, IEvD reports to the Board but plans to include a review of Board engagement with CSOs. IEvD assessment of Board engagement is mitigated by the independence of the Chief Evaluator to decide what is published, as set out in the Evaluation Policy. **IEvD does not plan to evaluate its own engagement with CSOs as part of this evaluation, as it would place IEvD in a position of potential conflict of interest.**

80. Fifthly, on timing, there is interest in having the findings of this evaluation in time for the EBRD Annual Meeting in Riga, 5-7 June 2026, however implementation will still be in the early stages. Given the complexity of covering all countries at an overview level and several country case studies, completion is not anticipated until at the earliest Q4 2027 internally and for publication in Q1 2027. At the Annual Meeting IEvD instead intends to run consultations with CSOs and provide an overview of the approach.

3.5. Evaluation ethics

81. Following the EBRD's Evaluation Policy, the evaluation team conducts the evaluation ethically to ensure its credibility, and in respect to a principle of "do no harm" in the design and conduct of evaluations.⁷ It also conducts evaluation independently, 'free from any threat to its objectivity.'

82. The evaluation team members follow the EBRD staff Code of Conduct which requires that staff 'shall observe the highest standards of integrity and ethical conduct and shall act with honesty and propriety' and avoid any conflict of interest.

83. The evaluation is conducted with full adherence to local laws and regulations with regards to civil society organisations, even where those may conflict with the development objectives. The evaluation will respect the "do no harm" principle to protect civil society from retaliation.

84. The evaluation is also guided by the Quality Standards for Development Evaluation set out by the OECD Development Assistance Criteria Guidelines. 8:

'Evaluation is undertaken with integrity and honesty. The evaluation team respects human rights and differences in culture, customs, religious beliefs and practices of all stakeholders. The team remains mindful of gender roles, ethnicity, ability, age, sexual orientation, language and other differences when designing and carrying out the evaluation.'

⁷ [Evaluation Policy](#)

⁸ Quality Standards for Development Evaluation OECD Development Assistance Criteria (DAC) DAC Guidelines and Reference Series

4. Implementation approach

4.1 Evaluation team

85. The evaluation team is led by Karin Becker, Principal Evaluation Manager II, IEvD, and includes Beatriz Perez-Timmermans, Associate Director, Charlotte Karagueuzian, Principal I Evaluation Manager and Sofia Keenan, Analyst, of IEvD.

86. The team will be supported by an independent consultancy firm with robust experience of evaluating civil society engagement at MDBs and surveying CSOs and counterparts. The work of the consultants will be supervised by the Team Leader. These specialists will undertake comprehensive research into the EBRD's engagement with civil society organisations across all operational countries, utilising a wide range of survey tools, data collection systems, and advanced analytical techniques.

87. In close collaboration with the evaluation team, the consultants will prepare and conduct a large-scale survey of around 1,100 CSOs, conduct a mapping of CSOs in defined case study countries and focus group sessions, review engagements and conduct interviews with stakeholders, gather internal and external data and conduct analysis of results to assess impact. They will also provide expert advice to help formulate recommended indicators for the transition impact methodology system. Consultants will play a pivotal role in the evaluation process by preparing a draft response to the evaluation questions using case study, perceptions and survey evidence.

88. Gabriele Fattorelli, Director of Corporate, Thematic and Knowledge products division will provide overall guidance on the evaluation, in close coordination with the Chief Evaluator.⁹

4.2 Deliverables and dissemination

89. Deliverables of a main report with an executive summary and detailed annexes are expected to be ready internally in Q4 2026, with publication in Q1 2027. Consultations will take place with CSOs attending the Annual Meeting in Riga of June 2026 and an overview of the evaluation approach will be provided there.

90. Dissemination will include a presentation to the Audit and Risk Committee and discussion.

91. The report and summary will be circulated to CSOs who partook in the survey and interviews, and EBRD staff participating. Case studies will be presented to Resident Offices on request.

⁹ As determined by the Audit and Risk Committee (April 2026)

92. IEvD will also participate in forums with other MDBs/IFIs on the topic of civil society engagement to share the findings, lessons and recommendations.

93. The evaluation will be published on the ebrd.com/evaluation pages, and on social media. It will be shared with the Evaluation Cooperation Group and OECD DAC.

4.3 Indicative timetable

Milestone	Estimated Delivery
Launch and Concept Note	Q4 2025
Approach Paper approved & finalized	Q2 2026
Field trips, survey, interviews, desk reviews	Q2-Q4 2026
Field trips to case study countries (TBD)	Q2-Q4 2026
Draft with executive summary circulated to internal peer reviewers	Q4 2026
Draft approved by Chief Evaluator ¹⁰ and shared with management for comments	Q4 2026
Final report approved by Chief Evaluator and shared with management	Q4 2026
Final report distributed and presented to the ARC /Board	Q4 2026
External publication of the report	Q1 2027
Communication of evaluation results across networks and through social media	Q1 2027
Dissemination event(s)	Q1 2027

5. Reviewers

5.1. Internal and external reviewers

94. **Internal peer reviewers include:** Samer Hachem, Director of Sector, project and country evaluation division, Olga Mrinska, Associate Director Evaluation and Harvey Susser, Associate Director Evaluation.

95. **External reviewers will be invited to comment from Asian Development Bank's Independent Evaluation Department, European Investment Bank's Operations Evaluation (EV), and World Bank's Independent Evaluation Group (IEG).**

¹⁰ As determined by the Audit and Risk Committee (April 2026)

5.2. Management counterparts

96. The key management counterparts for this evaluation are the Impact and Partnerships Civil Society Engagement team of EBRD, Risk's Environmental and Sustainability department, the ROs in case study countries, and IPAM. Given the scope of the evaluation the team will consult with Board, banking, policy, and specialist teams.

97. To ensure smooth and efficient gathering of evaluative evidence team will be maintaining regular relations with the management counterparts and will engage with CSOs and clients in selected case study countries.

6. Sources

The main internal documents used to prepare this Approach Paper include the following:

- 2012 Review of Criteria and Methodology to Implement the Political Aspects of the Mandate of the European Bank for Reconstruction and Development
- Access to Information Policy (AIP) 2024
- The Approach to Civil Society Engagement 2024-2029
- Environmental and Social Policy (ESP) 2024
- 2019 Project Accountability Policy (PAP)
- the Gender Equality and Human Capital Strategy 2026-2030
- Strategy for the Promotion of Gender Equality 2021-2025
- Green Economy Transition Strategy 2030
- Economic Governance Strategy 2030
- EBRD Approach to Accelerating Digital Transition 2021-2025
- 2021, Procedures for Handling Correspondence and Meeting Requests from Civil Society Organisations to the Board of Directors
- GRI Report (Sustainability Disclosure) 2024
- Sustainability Report
- Technical Cooperation Civil Society Capacity Enhancement Framework (CSCEF)

External sources include MDB evaluations of civil society engagement:

- ADB IEVD evaluation of engagement with civil society (underway in 2026)
- 2018 IEG WBG Engaging Citizens for Better Development Results AN INDEPENDENT EVALUATION
- 2020 EU Evaluation of the Civil Society Organisations and Local Authorities thematic programme (2014-2019) –Main Report – volume 1
- 2021 IDEV Evaluation of the AfDB's Engagement with Civil Society
- 2024 Evaluation of the AfDB's Engagement with Civil Society

Annexes

Annex 1. Policies, strategies and approach to EBRD's civil society engagement

Approach to Civil Society Engagement 2020-2025

This section provides an overview of the operating framework for civil society engagement in force during the evaluation period starting with the Bank's Strategic and Capital Framework, followed by the specific roadmap and approach for civil society, various policies outlining the accountability and transparency approaches to mitigate risks and concludes with a summary of the key thematic strategies and approaches which include civil society engagement.

Dedicated approach and roadmap for civil society engagement

The first strategic document directing civil society engagement at EBRD was the EBRD's Civil Society Engagement Roadmap 2017-2020 which aimed to contribute to the priorities of the Strategic Capital Framework and align with the transition concept and qualities.

The Roadmap was not Board approved or evaluated however progress was reviewed under the Approach 2024-2029. It aimed to actively promote green/sustainable, inclusive and well-governed market economies through donor funded technical cooperation support projects under the Civil Society Capacity Enhancement Framework. The EBRD's Civil Society Capacity Enhancement Framework (CSCEF) is an innovative, grant-based program that uses technical cooperation funds to provide training, mentoring, and small grants to diverse civil society actors in its regions of operations. Reporting was expected to take place through the Annual Report, Donors and the EBRD, Sustainability Report and the Public Information Policy Implementation Report.

The second strategic document guiding civil society engagement was the Approach to Civil Society Engagement 2024-2029 which offers CSE's widely accepted EBRD definition of civil society, which is broad enough to encompass groups, organisations, individual activists and opinion makers:

'Civil society is a public space between the state, the market and citizens, in which people associate voluntarily to advance common interests. For the EBRD's purposes, civil society actors include groups and organisations, such as non-governmental organisations (NGOs), think tanks, social movements, labour unions, community-based organisations, women's groups, business development organisations and other socioeconomic and labour-market actors, as well as individual activists and opinion makers.'

The approach outlines the EBRD's overall engagement with civil society as a key partner in promoting the principles of multiparty democracy and pluralism and the EBRD's activities in the economies where it operates. To contribute to the overarching EBRD strategic priorities, it pursues the following objectives: (1) supporting and engaging with civil society through meaningful mechanisms; (2) responding to global crises where they affect the EBRD regions through civil

society engagement; (3) developing the safety and openness of the civic space; and (4) strengthening the Bank's internal incentives for civil society engagement, effectiveness and accountability.

The Approach offers the long-term vision of 'Transforming the EBRD's approach to civil society engagement from risk mitigation to impact generation.' This requires enhanced civil society engagement towards the strategic themes of resilience, economic governance, green, inclusion and digital.

Policies covering civil society engagement for Bank accountability, transparency and risk mitigation

Other key documents including an approach to civil society engagement are the Access to Information Policy (AIP, 2019 and 2024), Environmental and Social Policy (2019 and 2024) and Project Accountability Policy (2019), which are summarised below.

The AIP 2024 discusses CSO engagement under Scope Policy Principles, 1.3 Accountability and the need "to identify, raise awareness and engage with a broad range of stakeholders including project affected people and communities, civil society groups and members of the public, taking into account the diverse nature and significance of specific interests, including the interests of those who may face barriers in access to information."

Environmental and Social Policy (2019 and 2024) sets out the Environmental and Social Requirement 10 of Stakeholder Engagement which includes civil society. ESR 1 also includes provisions on engagement with CSOs when it comes to monitoring and results validation.

The Project Accountability Policy (2019) sets out IPAM's purpose to: "...independently review issues raised by individuals or organisations concerning Bank-financed Projects, which are believed to have caused, or to be likely to cause, harm. The purpose of the mechanism is to facilitate the resolution of social, environmental and public disclosure issues among Project stakeholders; to determine whether the Bank has complied with its Environmental and Social Policy and the Project-specific provisions of its Access to Information Policy; and where applicable, to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank."

Thematic strategies and approaches on civil society engagement

The Strategy for the Promotion of Gender Equality 2021-2025 sought to build partnerships with civil society, acknowledging the crucial role of civil society and local women's organisations that work to advance women's rights. Prior to that, the Strategy for the Promotion of Gender Equality 2016-2020 mentioned that policy dialogue could be conducted with civil society organisations focused on women's rights which play an important role in systematically reviewing laws for signs of gender-based discrimination and holding governments and companies accountable for commitments they have made.

The EBRD Approach to Accelerating Digital Transition 2021-2025 does not address civil society organisations specifically but states that towards rolling out cybersecurity initiatives it would as part

of the ESP due diligence, ensure that impacts to workers, project affected people and broader stakeholders from digitalisation and cybersecurity are considered.

The Green Cities Framework I & II involves stakeholder engagement, specifically with civil society for the initial assessment and then the development of the Green Cities Action Plans.

The Resilience and Livelihoods Framework which focuses on Ukraine will be included as part of another separate 2026 evaluation of EBRD's engagement in Ukraine, and will therefore not be repeated in this evaluation, although feedback from civil society engagements collected as part of that evaluation will be considered and referenced where relevant.

Thirty draft country strategies have been put out for public consultation from 2020-2025 and were subject to review for their engagement with civil society both through public consultation. These are set out in Annex 4 and may include references to civil society work within each country. Beyond this, the CSE team ensures that upstream consultations now take place prior to drafting of new country strategies.

EBRD policies governing civil society engagement

Under the EBRD's Access to Information Policy (AIP) 2024 civil society organisations are recipients of information from EBRD on activities and operations when representing an affected group. Like the AIP 2019, the AIP 2024 states that as part of its accountability commitments to stakeholders, the EBRD shares information on its operations and activities 'in a timely and appropriate manner' with a broad range of affected groups including civil society and members of the public. The AIP 2024 sets out the commitment to consult with the public on strategies and policies.

The Environmental and Social Policy (ESP) 2024's Environmental and Social Requirement (ESR) 10 is concerned with ensuring engagement with stakeholders, which may include civil society groups. ESR 10 includes: Information Disclosure and Stakeholder Engagement, with stakeholders including civil society groups. This stems from the stated commitment 2.9 to the principles of transparency, accountability and stakeholder engagement, and promoting adoption and implementation of these principles by its clients. The ESR 10 recognises the importance of an open and transparent engagement between the client, its workers, worker representatives, local communities and persons affected by the project and, where appropriate, other project stakeholders as an essential element of good international practice and corporate citizenship.

Projects classified as higher risk are Category A and undergo more rigorous Environmental and Social Impact Assessment. The resulting Environmental and Social documentation for these includes the Environmental and Social Action Plan and a Stakeholder Engagement Plan (SEP), which may include engagement with civil society. Some Category B projects may also require a SEP.

The ESP also considers stakeholder input from the perspective of Performance Requirement 1: Assessment and Management of Environmental and Social Risks and Impacts. It requires 'a dynamic, continuous process, initiated and supported by management, and involves meaningful communication between the client, its workers, the local communities affected by the project and, where appropriate, other stakeholders.'

The 2019 Project Accountability Policy (PAP) governs the procedures for the Independent Project Complaint Mechanism (IPAM), an independent body reporting to the Board, for handling issues raised by organisations including those related to civil society.

Country assessments and strategies

Contextual information about the environment in which civil society functions is set out in country assessments and political assessments are prepared for new country strategies, setting out the scale and independence of civil society.

Upon becoming a member and recipient country of the EBRD, a country assessment is undertaken which encompasses the extent of compliance with Article One of the Agreement Establishing the Bank, the principles of multi-party democracy and pluralism and amongst other things, a functioning civil society.

Following this, on a triennial basis, country strategies provide an updated political assessment detailing the scale and independence of civil society as one of the key criteria. Annual Country Strategy Delivery Reviews may contain details of capacity building activities with civil society organisations, where relevant.

EBRD Board Engagement with Civil Society

The Board meets with representatives of civil society during the Annual Meeting Civil Society Programme, organised by the Civil Society Engagement team, and a report is issued following the meeting each year, outlining the areas discussed. The Civil Society Programme is a three-day event comprising open panel sessions and closed consultation meetings between CSOs and the Bank's President, the Board of Directors and other relevant EBRD staff about the Bank's projects, policies and strategies. Around 200 CSO representatives participate in the programme each year.

Throughout the year, Board Directors meet with representatives of civil society as part of the programme for Board Consultation Visits to countries where EBRD operates. The itinerary is prepared by the Resident Office in collaboration with the Civil Society Engagement team.

In 2021, the Bank issued Procedures for Handling Correspondence and Meeting Requests from Civil Society Organisations to the Board of Directors, explaining the role of the Civil Society Engagement team, Office of the Secretary General and Management, to ensure smooth processing of requests for information and meetings.

To enhance its engagement with civil society, the EBRD established a Civil Society Steering Committee for advisory purposes to assist the Bank with its country and sector strategies, helps to organise the Civil Society Programme at the EBRD's Annual Meeting and supports the expansion of the Bank's CSO network. In November 2022, a pilot committee was set up to help design the engagement mechanism within the Steering Committee and assist with the selection of the committee proper. In December 2023, after a rigorous process, the members of the new Civil Society Steering Committee were selected. The Steering Committee's mandate runs until the end of 2025.

Senior Management meetings with civil society

Under the Approach for 2024-2029 senior level management engagement with civil society has become more prominent following the President's increased number of meetings and dialogue with counterparts. Vice Presidents and Managing Directors also meet with Civil Society from time to time during field trips and during dialogue on new investment proposals and signings. These meetings are generally facilitated by the Civil Society Engagement team who oversees invitations, agendas and arrangements.

Results measurement

The first edition of the Impact report published in 2024 referenced engagement with civil society through the development of Green Cities Action Plans, which require engagement with all stakeholders, but did not refer to other engagements because the Bank's impact results systems do not currently systemically report on them. Going forward the Impact team is exploring ways to better capture EBRD's engagement with civil society and its contribution to impact generation.

The Transition Objective Monitoring System (TOMS) as EBRD's primary tool for measuring transition impact from projects does not currently capture related input from engagement with civil society. This is an area that the Impact team plans to incorporate where possible as part of the TOMS 2.0 revision. The Impact team would find it useful to learn any lessons from other MDBs/IFIs on incorporating civil society engagement into results management systems and from a review of EBRD case study engagements. Impact team is already collaborating with other MDBs/IFIs as part of the HIPSO working group. Impact team expressed an interest in suggestions to help map the contribution of civil society engagement to impact generation.

The Compendium of Indicators in place at the time of this Approach Paper includes some indicators related to stakeholders but does not include any specific to civil society engagement. Examples of existing indicators with outputs or shorter-term outcomes that could be related to engagement with civil society include: 'Practices of the relevant stakeholder improved'; 'client engages in policy dialogue'; 'Advocacy knowledge management outreach activity delivered'; Project preparation product approved; Project implementation support completed.

This evaluation, through comparative analysis with other MDBs and case study reviews of civil society engagement connected with EBRD investment projects, may be able to suggest ways forward for the Impact team to capture results, through the TOMS Questionnaire and indicators.

Annex 2. Evaluation Matrix

The evaluation will include two important angles, i) increasing impact at the local level and ii) accountability, transparency, and EBRD governance of CSO engagement internally and externally with CSOs as it contributes to increasing the impact of engagement.

Both angles were considered important by Board and Management during the consultation phase, with a preference to focus more on the local level. Impact at the local level would therefore form the main emphasis for a thematic evaluation, with a complementary review of the accountability and transparency mechanisms for engagement which supports it:

- a. Main focus: Increasing impact at the local level- CSO engagement and learning through country strategies and at the project direct investment level, CSO capacity building through technical cooperation and other support, policy dialogue including local engagement with CSOs, private sector engagement of CSOs
- b. Complementary review: Accountability and transparency through governance for CSO engagement at the institutional level: the Bank's institutional CSO engagement at the higher level, IPAM, consultation with CSOs on policies and strategies (see Annex 4 for list), implementation of CSO engagement in Access to Information Policy, Environmental and Social Policy, Annual Meeting consultation with CSOs, day to day Board interaction with CSOs

To evaluate the first component a. the evaluation will take a fully decentralised approach to look at how CSO engagement is enhancing impact and mitigating risk through investment projects and policy work. This includes integrating local knowledge into projects and activities and enhancing CSO collaboration and building capacity. It will involve a project participatory approach with CSOs and consideration of contextual considerations to look at impact, taking stock of community ownership and legitimacy. The evaluation will seek to elaborate on civil society engagement through:

- a. Conducting a local CSO mapping exercise – within the local context
- b. Reviewing capacity building and partnerships (knowledge sharing);
 - How the Bank's engagement is responding to crises, fostering inclusion, supporting a green transition, improving economic governance, and harnessing innovation and digital transition
 - Linking public and private sectors – CSOs are situated in the middle – how do they help progress private sector or improve private sector outcomes?
- c. Transparency, accountability and institutional governance through information disclosure and consultations

Focus Area 1: CSOs at the local level, mapping, survey of type, level of engagement with EBRD and partnerships

Focus Area 2: Country Level thematic deep dives – Resilience, Green, Economic Governance, Inclusion, Digital and including linking public and private sector

Focus Area 3: EBRD Accountability and Transparency of CSO engagement (information disclosure, consultations, Annual Meeting

The evaluation will include results of civil society engagement from all levels and aspects of the Bank's activities and investment operations through the local lens, including the development and implementation of strategies and policies, consultancy work and donor funded technical cooperation projects for civil society.

The levels of engagement are set out in The Approach to Civil Society Engagement 2024-2029. They include information disclosure (according to the AIP), events, Annual Meeting and BCVs (high level on strategic and project issues), consultations and accountability (on strategies and policies, see Annex 4 for list), operational collaboration (through technical cooperation and the Civil Society Capacity Enhancement Framework), and Partnerships (including agreements with NGOs).

This evaluation looks at how civil society engagement is carried out across the Bank, especially at the local level. It involves a wide range of teams and departments working together to support transparency, inclusion, sustainability, and effective partnerships.

- the Board (at Annual meetings, through BCVs and correspondence)
- President and Senior Management and Resident Offices (strategic and project level, and at flagship events such as the Annual Meeting)
- The Policy Strategy and Delivery team, including through the Regional Policy and Strategy team's development of policies and strategies and public consultation (see Annex 4 for list), Competitiveness and Governance team through investment climate governance work with CSOs and Gender and Economic Inclusion team through engagement with CSOs advocating for gender equality and human capital, including technical cooperation support.
- Impact and Partnership's Civil Society Engagement team, through correspondence and the Steering Committee and Annual meetings, and Civil Society Capacity Enhancement Framework
- Climate Strategy and Delivery – TCs with civil society to support sustainable energy
- Banking Operations and Resident Offices through project concept and due diligence, and client liaison for stakeholder engagement action plans
- Risk Environment and Sustainability Operations, through Environmental and Social Impact Assessments and ES Action Plans.
- IPAM through the project complaints process.

This evaluation matrix sets out the evaluation questions against the relevant OECD DAC evaluation criteria, and proposes judgment criteria, indicators and data sources to answer each question as part of the evaluation. The indicators are intentionally broad and qualitative to capture the results of engagement, and not all may apply depending on the volume and nature of the engagements taking place. Data sources for evidence will be verified through both interviews, documentation and external web sources wherever possible and reported results will be subject to the limitations of data availability.

Table 1: Evaluation Matrix for the Evaluation of EBRD's Civil Society Engagement

OECD- DAC criteria	Evaluation Questions	Judgement Criteria	Indicators	Data sources
Relevance & Coherence	Evaluation Question 1 (Relevance & Coherence): To what extent is EBRD's engagement with CSOs relevant to the strategic objectives, and policy commitment; and how coherent is it with the efforts of other MDBs/IFIs?	<i>EBRD's actual engagements with CSOs in countries</i> during the evaluation period of 2020-2026 reflect the objectives and priorities in the Country Strategies, AIP, ESP and PAP policies and CSO Roadmap and Approach where relevant and reflect the evolving context in countries	Design of EBRD CSO engagements including: Annual Meeting CSO Programme, President meeting with CSOs, RO meetings with CSOs, Invitation to comment on strategies and policies process, BCVs, Correspondence with Board and Bank, Project PSD and ESAP Stakeholder Engagement Plans (SEPs) including civil society, project complaints initiated by CSOs through IPAM (see Annex 6) and TCs for capacity building with CSOs reflects: ➤ Country Strategy priorities ➤ CSO Roadmap or Approach as relevant Civil Society Roadmap 2017-2020 Priorities include: 1. Strengthening institutional transparency and accountability of the EBRD 2. Supporting good governance among governments and EBRD clients 3. Fostering economic inclusion in the EBRD region 4. Supporting sustainable energy and resources in the EBRD region CSO Approach 2024-2029 objectives include: 1. Strategic objective 1: Supporting and engaging with civil society through meaningful mechanisms 2. Strategic objective 2: Responding to global crises where they affect the EBRD regions through civil society collaboration	• Surveys • Case study evidence • Resident Office reports on engagements with civil society • Interviews with staff • Agenda and report on Civil Society AM programme • Report on Invitation to Comment on Strategies and Policies • Board Consultation Visit reports and agendas • ESD Stakeholder Engagement Plans (SEPs) for high risk Category A/B direct investment projects (see Annex 3) • Published documents related to project complaints (IPAM, see Annex 6 for list of project complaints brought by CSOs) • TC documents including approval documents, TORs and consultant reports • Policies and Strategies, revised versions

OECD- DAC criteria	Evaluation Questions	Judgement Criteria	Indicators	Data sources
			3. Strategic objective 3: Developing the safety and openness of the civic space 4. Strategic objective 4: Strengthening the EBRD's internal incentives for civil society engagement, effectiveness and accountability.	
		CSO engagement in each country reflects PR 10 in the Environmental and Social Policy (ESP) relating to stakeholder engagement	➤ Stakeholder Engagement Plans (SEP) for ESD high-risk Cat A (or B) projects reflect engagement with relevant civil society stakeholders (see Annex 3) ➤ Green Cities Programme planning reflects strong CSO engagement	• Case study feedback • CSO mapping exercise • Survey of CSOs on adequacy of consultation • Category A high risk projects with ESAP and Stakeholder Engagement Plan (SEP) (see Annex 3)
		Project complaints brought by CSOs in each country during the evaluation period 2020-2026 are adequately addressed through the Project Accountability Policy (PAP)	➤ Complainant is satisfied with the outcome of the process ➤ Opportunity to use the project complaints mechanism is adequate	• Interview with CSOs bringing complaints • Published documents on project complaints • Media sources • CSO survey • Case study feedback
		EBRD's engagement with civil society complements that of other MDBs/IFIs	➤ Areas of complementarity outweigh areas of divergence ➤ Comparative analysis of integration of civil society engagement into results management systems and incentives with other MDBs/IFIs and extent of harmonisation ➤ Lessons from other IFI/ MDB evaluations on CSO engagement are incorporated into EBRD's practices	• Document review / survey/ interviews to confirm other MDBs/IFIs approach to CSOs • Evaluations by other IFIs/MDBs • Case study feedback
Outcomes, Impact & Sustainability	Evaluation Question 2 (Outcomes, Impact & Sustainability): What outcomes and impacts have the	EBRD engaged with CSOs <i>across the regions where it works</i> consistently to improve the competitiveness of the private sector, green and	➤ Number of countries and times in which EBRD engaged CSOs across thematic areas ➤ EBRD's CSE across all types and across all countries: • Information disclosure	• Documents on Pegasus related to public consultations across all country strategies and policies (see Annex 4 for list) • Correspondence collected centrally by Operations teams, ESD and CSE teams,

OECD- DAC criteria	Evaluation Questions	Judgement Criteria	Indicators	Data sources
	EBRD's CSO engagements had and how sustainable are the results?	sustainable, inclusive and well-governed economies.	- Events and Annual Meeting - Consultations and accountability - Operational collaboration - Partnerships contributes towards enhanced results across the relevant thematic areas: competitiveness, green, inclusive and well-governed (qualitative) and digital innovation	- TCs with CSOs, - Project Stakeholder Engagement Plans (SEPs) with a civil society component, and - Project complaints – published documents. - Relevant strategies and reports
		EBRD's CSO engagement <i>in case study economies</i> contributes towards transition to a competitive private sector	➤ Extent to which completed CSO engagement led to more competitive private sector projects eg Increased private sector ownership or participation through business associations such as renewable energy association eg Improved business skills, standards and business sophistication through for example work with CSOs to improve employment opportunities through industry associations; eg enhancing CSO capacity to work with the private sector to address competition issues) ➤ Extent to which CSO engagement contributed to improvements in governance-relevant practices affecting private sector competitiveness, such as transparency, procurement processes, regulatory dialogue, or health and safety standards	- Bank reporting - Country and sector strategies - TC documents - Stakeholder Engagement Plans (SEPs) - Monitoring consultant reports - Interviews with operations teams, CSOs and client counterparts - Interviews with CSOs in country case study deep dives - Any previous evaluation work
		EBRD's CSO engagement <i>in case study economies</i> contributes towards a green and sustainable economy	➤ 'Extent to which completed CSO engagement supported greener and more sustainable investments (eg to promote sustainable energy or sustainable transport use) ➤ Extent to which completed CSO engagements led to improved governance practices for green and sustainable economy	- Bank reporting - Country and sector strategies - TC documents - Stakeholder Engagement Plans (SEPs) - Monitoring consultant reports - Interviews with operations teams, CSOs and client counterparts - Interviews with CSOs in country case study deep dives

OECD- DAC criteria	Evaluation Questions	Judgement Criteria	Indicators	Data sources
				Any previous evaluation work
		EBRD's CSO engagement in case study economies contributes towards more inclusive economies	- Extent to which completed EBRD CSO engagements led to equal access to opportunities for women (qualitative) - Extent to which completed CSO engagement led to equal access to opportunities for youth, refugees and remote regions (qualitative) - Extent to which completed CSO engagements improved inclusive governance	- Bank reporting - Country and sector strategies - TC documents - Stakeholder Engagement Plans (SEPs) - Monitoring/consultant reports - Interviews with staff, consultants, CSO and counterparts - Interviews with CSOs in country case study deep dives - Any previous evaluation work
		EBRD's CSO engagement in case study economies contributes towards well-governed economies and companies	- Extent to which completed EBRD CSO engagements led to greater transparency and accountability in client counterparts (private and public sector) - Extent to which completed CSO engagements led to CSOs able to establish working relationships and dialogue with counterparts (government or corporate level) - Extent to which completed CSO engagements led to more effective decision making at the national local and private sector level	- Bank reporting - Country and sector strategies - TC documents - Stakeholder Engagement Plans (SEPs) - Monitoring/consultant reports - Interviews with staff, consultants, CSO and counterparts - Interviews with CSOs in country case study deep dives - Any previous evaluation work
		EBRD's CSO engagement in case study economies contributes towards more innovative and cybersafe use of digital technology to increase effectiveness	Extent to which completed CSO engagement resulted in more innovative, cybersecure and effective engagement with clients/counterparts	- Bank reporting - Country and sector strategies and approaches - TC documents - Digital Hub data - Interviews with CSOs in country case study deep dives - Any previous evaluation work

OECD- DAC criteria	Evaluation Questions	Judgement Criteria	Indicators	Data sources
		Across all regions, stakeholder perceptions of EBRD's engagement with CSOs are that it is active and productive	➤ CSOs perceive their interaction with EBRD through engagement is productive ➤ Local media sources reflect EBRD's engagement with CSOs (eg invitations for public comment, opportunities to raise issues and avenues for addressing concerns) ➤ In various contexts of free and less free environments for CSOs, stakeholders and clients understand the reason for EBRD's engagement with CSOs ➤ EBRD tailors its approach according to the country context ➤ Other MDBs/IFIs in case study countries have the impression EBRD's engagement with CSOs is active and productive ➤ Quality of engagement is high at the local level (CSO survey)	• Case study evidence • Survey of CSOs • Interviews/survey with other MDBs • Evidence from past /other evaluations • Media sources
Efficiency	Evaluation Question 3 (Efficiency): How well has EBRD deployed existing resources to engage with civil society towards increased impact and accountability, and how transparent and efficient is the EBRD as perceived by CSOs?	Banking, ROs and ESD have sufficient resources to engage with civil society to increase impact and accountability. CSE team has sufficient resources to manage institutional civil society engagement Systems support strong communication and engagement across different teams in the Bank Strong awareness of roles and responsibilities for civil society engagement	➤ Staff are aware of roles and responsibilities for CSO engagement (survey) ➤ Operations staff are incentivised to engage with civil society for projects ➤ Guidance and procedures set out how teams work together to strengthen civil society engagement ➤ Staff have sufficient time and support to conduct civil society engagement ➤ CSE team and ROs have sufficient donor and staff resources to conduct capacity building with CSOs ➤ CSE team have resources to dedicate to strengthening engagement	• Case study evidence • Internal guidelines, protocols, procedure and operations manuals • Policies setting out roles and responsibilities • Transition Objective Monitoring System • Interviews with Donor Partnerships and key donor countries • Interviews with staff and ROs • Evidence from past /other evaluations • Public consultation process for development of strategies and policies

OECD- DAC criteria	Evaluation Questions	Judgement Criteria	Indicators	Data sources
		EBRD's resources for civil society, including CSE team, Banking, RO, Senior Management and ESD staff, and donor resources are adequate to move to impact generation	➤ Training on CSE for EBRD staff and clients is adequate ➤ TC resources are adequate to build CSO capacity and organisation to provide input into EBRD work ➤ Key personnel, including senior management, prioritise and further CSE to strengthen relationships and input of CSOs ➤ CSE team has capacity to deliver across all areas, headcount and budget.	• Internal Bank information, CSE team records, trainings online, donor reporting, events calendars and news/ social media publications, RO interviews • Case study evidence

To mitigate the lack of time, IEVD will prioritise the wholesale surveys of Board, CSOs and staff, to provide an early note on emerging findings, ahead of completion of case studies and the full report in 2H 2026.

Table 2: Challenges, Risks, and Mitigation Actions for the Evaluation of EBRD's Civil Society Engagement

Challenges / Limitations	Risks	Mitigation Actions
1. The EBRD's Approach to Civil Society Engagement 2024–2029 is not Board-approved and has only been in operation for two years. Too early to evaluate results.	• Lack of shared institutional ownership and clarity on expectations. • Insufficient evidence base to assess outcomes of new activities.	• Focus evaluation at the local level (policies, country/thematic strategies, project-level engagement, RO interactions). • Include review of IPAM complaints mechanism. • Use a systems-based approach to qualitatively assess interrelationships, drivers of success, and patterns. • Use the Approach only to inform ToC and design matrix without conducting a full assessment of it.
2. Information on civil society engagement is dispersed across multiple teams, inconsistent, and not systematically reported.	• Incomplete or fragmented evidence base. • Risk of overlooking engagement efforts or drawing partial conclusions.	• Supplement desk review with targeted data requests across departments. • Conduct interviews with CSOs, consultants, staff. • Use Annex 7 resources as starting point.
3. IEvD reports to the Board but is expected to review Board engagement with CSOs; cannot independently evaluate its own engagement with CSOs.	• Potential conflict of interest. • Lack of independence in evaluating IEvD's own CSO engagement.	• Rely on the Chief Evaluator's independence in deciding what is published (per Evaluation Policy). • Exclude assessment of IEvD's own CSO engagement — this remains part of IEvD's self-assessment and external evaluation processes.
4. Tight timeline – interest in findings ahead of the 2026 Annual Meeting (June). Evaluation is complex, covering all countries and multiple case studies.	• Risk of incomplete analysis prior to key milestones. • Pressure may compromise depth or breadth of findings.	• Prioritise wholesale surveys (Board, CSOs, staff) early. • Produce an early note on emerging findings. • Complete case studies and full report in 2H 2026.

Annex 3. Projects with client led Stakeholder Engagement Plans

To narrow the scope of this evaluation for case study countries, the evaluation will focus on projects categorised “A” as having potentially significant environmental and/or social impacts using the Environmental and Social Policy 2024 categorisation system and will consider others (including Cat “B”) on a case-by-case basis where engagement with civil society organisations has taken place. EBRD uses the categorisation to identify projects requiring additional work through Environmental and Social Impact Assessments.

According to the Environmental and Social Policy 2024 (p15):

‘The EBRD categorises each project to determine the nature and level of environmental and social assessment and appraisal, information disclosure and stakeholder engagement required. This will be commensurate with the nature, location, sensitivity and scale of the project, and the significance of any new and additional potential environmental and social impacts.

A project is categorised “A” when it could result in potentially significant environmental and/or social impacts, including direct and cumulative environmental and social impacts, which are new and additional and cannot be readily identified, assessed or mitigated. Projects categorised as A require a formalised and participatory ESIA process.

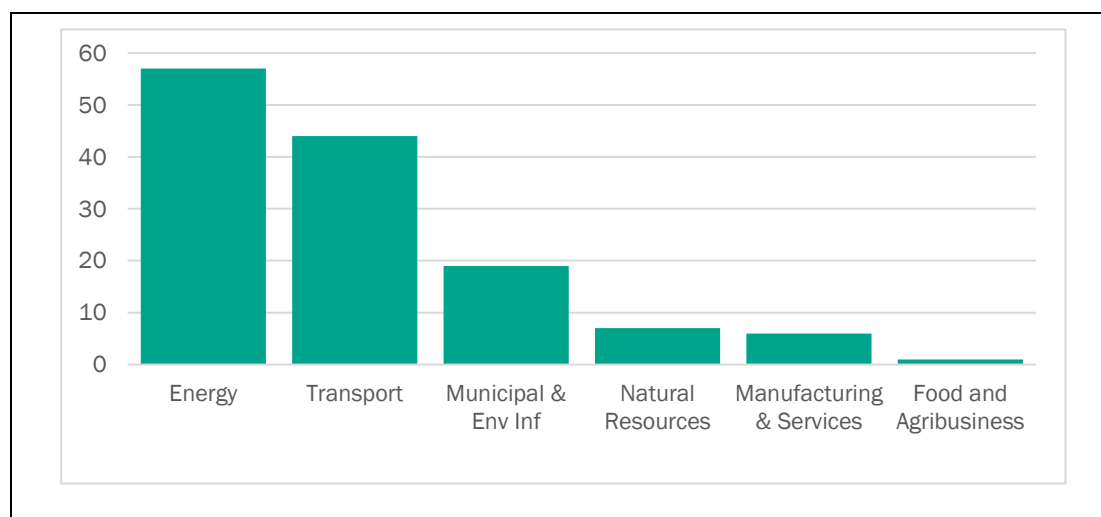
A project is categorised “B” when its potential environmental and/or social impacts are typically site specific and/or readily identified and addressed through mitigation measures. The scope of environmental and social assessment will be determined by the EBRD on a case-by-case basis.

Based on the latest available data 134 direct investments are categorised “A” (see table 3 below).

The evaluation will look at how the client identified stakeholder engagement conducted as part of the Environmental and Social Impact Assessment (ESIA), ESR 1 and at client’s Stakeholder Engagement Plan (SEP) where available, and any available monitoring reports progress. SEPs are part of the Environmental and Social Requirement (ESR) 10 (p100):

‘For projects that are likely to be associated with adverse environmental and/or social risks and impacts, **the client will develop and implement an SEP or an equivalent documented process**, proportionate to the nature and scale or the risks, impacts and development stage of the project. The SEP (or equivalent) will be developed and disclosed by the client as early as available, in accordance with the requirements of paragraph 22 (in the ESR 10), to inform stakeholders and allow them to provide feedback.’

Other ESRs relevant to civil society organisations engagement with the client will also be considering during the evaluation (ie ESRs 2 Labour and Working Conditions, 3 Resource Efficiency Pollution Prevention and control, 4 Health Safety and Security, 5 Land acquisition restrictions on land use and involuntary resettlement, 6 Biodiversity, 7 Indigenous Peoples and 8 Cultural Heritage.

Figure 1: Number of Active Category A direct investment projects by sector**Table 3: Number of Active Category A direct investment projects by country**

Uzbekistan	12
Kazakhstan	12
North Macedonia	11
Bosnia And Herzegovina	9
Poland	8
Türkiye	8
Ukraine	7
Egypt	7
Serbia	5
Jordan	5
Georgia	5
Mongolia	5
Morocco	4
Moldova	4
Belarus	3
Albania	3
Croatia	3
Azerbaijan	3
Montenegro	3
Kyrgyz Republic	3
Armenia	2
Tunisia	2
Tajikistan	2
Greece	2
Romania	2
Hungary	1
Kosovo	1
Regional	1
Slovak Republic	1
Grand Total	134

Table 4: List of active Category A direct investment projects for country case studies (brief review and indepth)

Op Id	Operation Name	Country	EBRD Region	Sector Team	Operation Life Cycle	Signing Date
46736	Kotayk and Gegharkunik Solid Waste Management Project	Armenia	SEE	Municipal & Env Inf	Repaying	19 Dec 2014
51293	North-South Road Corridor (Sisian-Kajaran Southern Section)	Armenia	SEE	Transport	Disbursing	15 May 2024
31849	Croatia: Rijeka Bypass	Croatia	CEB	Transport	Repaying	12 Dec 2006
41325	Corridor Vc Completion Project	Croatia	CEB	Transport	Repaying	24 Nov 2010
50712	Corridor Vc - Motorway Completion	Croatia	CEB	Transport	Repaying	02 Jul 2020
49794	Lekela Wind BOO	Egypt	SEMED	Energy	Repaying	11 Jul 2019
49905	GrCF2 W2 - Alexandria Metro	Egypt	SEMED	Municipal & Env Inf	Disbursing	27 Dec 2021
51509	Gulf of Suez Wind II	Egypt	SEMED	Energy	Disbursing	03 Mar 2023
53097	Ras Ghareb Windfarm	Egypt	SEMED	Energy	Disbursing	07 Dec 2024
54346	HAU Energy (f. Project Footpath)	Egypt	SEMED	Energy	Disbursing	28 Mar 2024
55308	Scatec BESS	Egypt	SEMED	Energy	Disbursing	12 Jun 2025
55457	Project Amun	Egypt	SEMED	Energy	Signed	19 Dec 2024
44284	IPP4 Al-Manakher Power Project	Jordan	SEMED	Energy	Repaying	17 Oct 2012
47412	Hussein Thermal Power Station Repowering/Zarqa	Jordan	SEMED	Energy	Repaying	08 Dec 2016
48100	Al Rajef Wind Farm	Jordan	SEMED	Energy	Repaying	20 Oct 2016
49222	Shobak Wind Farm	Jordan	SEMED	Energy	Repaying	28 Nov 2017
49875	MR3: Al Ghabawi Septic Tank Facility	Jordan	SEMED	Municipal & Env Inf	Disbursing	28 Nov 2021
41158	Oyu Tolgoi	Mongolia	CA	Natural Resources	Repaying	15 Dec 2015
43044	Moncement	Mongolia	CA	M & S	Repaying	30 Apr 2014
44096	Senj Sant equity	Mongolia	CA	M & S	Disbursing	11 May 2013
50766	Ulaanbaatar Darkhan Road	Mongolia	CA	Transport	Repaying	10 Jan 2020
51505	Choir-Sainshand transmission line	Mongolia	CA	Energy	Disbursing	14 Dec 2022
42163	Turkey Eurasia Tunnel	Türkiye	T&C	Transport	Repaying	08 Dec 2012
42787	Keskinoglu	Türkiye	T&C	Food and Agribusiness	Repaying	01 Feb 2013
42896	Kirikkale CCGT	Türkiye	T&C	Energy	Repaying	28 Dec 2012
43170	Mersin Wastewater Project	Türkiye	T&C	Municipal & Env Inf	Repaying	18 Jun 2012
44166	Ankara Etlik Hospital PPP	Türkiye	T&C	Municipal & Env Inf	Repaying	25 Jun 2015
44596	EFELER GPP	Türkiye	T&C	Energy	Repaying	29 Jun 2015
51582	Ispartakule - Cerkezkooy Railway Line	Türkiye	T&C	Transport	Disbursing	15 Nov 2021
52502	Nakkas - Basaksehir Motorway PPP	Türkiye	T&C	Transport	Disbursing	18 Oct 2024

Op Id	Operation Name	Country	EBRD Region	Sector Team	Operation Life Cycle	Signing Date
37511	Cherkasy Energy Efficiency Project	Ukraine	U&M	Municipal & Env Inf	Repaying	10 Jan 2008
38147	Zhytomyr District Heating Project	Ukraine	U&M	Municipal & Env Inf	Repaying	23 Feb 2012
40147	South Ukraine Transmission Project	Ukraine	U&M	Energy	Repaying	19 Oct 2010
42086	Nuclear Power Plant Safety Upgrade Program	Ukraine	U&M	Energy	Repaying	25 Mar 2013
50215	USELF: Syvash Wind Power Plant	Ukraine	U&M	Energy	Repaying	21 Jan 2019
50729	GrCF2 W2 - Khmelnytskyi Solid Waste Project	Ukraine	U&M	Municipal & Env Inf	Repaying	07 Oct 2020
56077	RLF - Ukrnafta II	Ukraine	U&M	Energy	Signed	11 Jul 2025
50116	Talimarjan Power Project	Uzbekistan	CA	Energy	Repaying	14 Jan 2019
50691	Navoi Transmission Upgrade	Uzbekistan	CA	Energy	Repaying	20 Nov 2019
51265	Horezm Regional Roads	Uzbekistan	CA	Transport	Disbursing	02 May 2024
51963	Syrdarya Power Project	Uzbekistan	CA	Energy	Repaying	02 Mar 2021
52362	Zarafshon Wind	Uzbekistan	CA	Energy	Disbursing	02 Sep 2022
52772	Uzbekistan Bash WPP	Uzbekistan	CA	Energy	Repaying	12 Dec 2022
52773	Uzbekistan Dzhanakeldy WPP	Uzbekistan	CA	Energy	Repaying	12 Dec 2022
52874	Sarimay-Djankeldy Transmission	Uzbekistan	CA	Energy	Disbursing	06 Oct 2022
54421	Sarimay-Muruntau Transmission	Uzbekistan	CA	Energy	Disbursing	19 Dec 2024
54561	Pilot Uzbek Renewable Hydrogen Project - WPP	Uzbekistan	CA	Energy	Repaying	27 Aug 2024
54648	Pilot Uzbek Renewable Hydrogen Project - Electrolyser	Uzbekistan	CA	M & S	Repaying	27 Aug 2024
55025	Pilot Uzbek Renewable Hydrogen Project - EBL	Uzbekistan	CA	M & S	Disbursing	10 Sep 2024

Annex 4. Invitation to public to comment on country and thematic strategies and policies 2020-2026

The evaluation will involve a review the public consultation process for country strategies, thematic strategies and policies taking place from 2020-2026. There have been 31 invitations for the public to comment on country strategies issued from 2020-2026 as set out in Table 3 below.

Table 5: Country strategies with invitation to public comment 2020-2026*

2020	2021	2022	2023	2024	2025	2026
Albania	Georgia	B&H	Croatia	Kyrgyz Republic	Albania	Tunisia
Greece	Hungary	Egypt	Moldova	Morocco	Armenia	
Jordan		Kazakhstan	Serbia	Poland	Azerbaijan	
Romania		Kosovo	Slovak Republic	Slovenia	Bulgaria	
Tajikistan		Mongolia		Türkiye	Jordan	
				Uzbekistan	North Macedonia	
					Romania	
					Tajikistan	
Case study						

* The last public invitation to comment for the Strategy for Ukraine consultation took place in 2018

The following 12 policies and thematic strategies have been or will be subject to public consultation from 2020-2026 once finalised:

Table 6: Policies and Strategies with invitation to public comment 2020-2026

2021	2022	2023	2024	2025	2026
Financial Sector Strategy			Access to Information Policy	Financial Sector Strategy	Green Economy Transition 2030 Strategy
Promotion of Gender Equality			Environmental and Social Policy	Real Estate Sector Strategy	Gender Equality and Human Capital 2030
			IPAM Policy Review: Report	Telecommunications, Media & Technology Sector Strategy	Economic Governance Strategy 2030
				Food and Agribusiness Strategy	

Annex 5. Civil Society capacity building technical co-operation projects 2020-2025

This annex is intended to share details of TC projects with CSOs. The CSE team engages with civil society to build capacity via the TC Civil Society Capacity Enhancement Framework.

Projects are sometimes implemented with donor funds for technical assistance. TC projects listed include those approved within the evaluation period, and those already under implementation during the evaluation period.

Table 7: TC projects led by the CSE team implemented 2020-2025

Topic	T CRS ID	TC approved 2020-2025, led by CSE team	Amount (T CRS)	TC Type	Country	Proposed case study country
Digital capacity	20416	Cybersecurity Support for Civil Society in Ukraine (Underway)	€52,000	Non transactional	Ukraine	✓
	14156	Digital Transformation of Civil Society (Complete)	€236,286	Non transactional	Türkiye	✓
	16306	Supporting Capacity Building and Digitalisation of Help Centre in Poland as part of Sustainable Integration of Ukrainian Refugees in Affected Countries	€ 128,255	Non transactional	Poland	
General capacity	13627	COVID-19 Response – Developing civil society capacities to monitor efficiency and effectiveness of public spending under the immediate pandemic response instruments and governments economic stimulus packages	€395,845	Non transactional	Regional (Kosovo, KR)	
	13956	Capacity Building Programme for Stakeholder Engagement in the COVID-19 Crisis and Beyond (Complete)	€ 148,000	Non transactional	Türkiye & Georgia	✓
	12705	Enhancing Civil Society Capacities in Central Asia and Southern Caucasus (Enhancing the capacity of civil society on good governance in Central Asia - Phase I)	(Phase 1 €292,000)	Non transactional	CA Caucasus (Phase 1: KZ, KR, TAJ, TRK, UZB)	✓
	20376	Central Asian Business Integrity Network (CABIN) (Complete)	€140,417 contracted	Non transactional	Kazakhstan, Central Asia	✓
	9268	2019 Improving Transparency and Effectiveness of Public Procurement in Moldova through Cooperation with Civil Society	€ 373,000	Non transactional	Moldova	
	8991	2017 Promoting Business Integrity in Serbia and Romania: Enhancing the Capacity of Civil Society to Work Collaboratively with the Private and Public Sector	€ 450,000	Non transactional	Serbia & Romania	

Inclusion	16707	Mobilisation of the Private Sector for Ukrainian Refugee Integration in Croatia	€ 300,000	Non transactional	Croatia	
	16416	Refugee and Local Women's Economic Inclusion in Turkey (Complete)	€ 150,000	Non transactional	Türkiye	✓
	15418	Supporting Development of Entrepreneurial Skills amongst Women in Azerbaijan	€ 73,050	Non transactional	Azerbaijan	
	15361	Capacity Building Project for Turkish Automotive Sector Association (TAYSAD) in Supporting Women's Economic Inclusion (Complete)	€ 54,440	Non transactional	Türkiye	✓
	10108	Supporting Quality Employment in the Jordanian Restaurant Industry (Complete)	€ 110,000	Non transactional	Jordan	✓
	7705	2019 Enhancing the Capacity of Civil Society to Promote the Safe Use and Sustainable Benefits of Rail Transport in Albania	€ 120,000	Transactional	Albania	
	7700	2017 Regional - Working with Civil Society to Promote Sustainable Energy: Sustainable Electricity Use and Integrated Markets	€ 250,000	Transactional	Regional	✓
Sustainable energy and infra projects	8119	Fayoum Wastewater Expansion Programme - Stakeholder Participation Programme	€ 999,859	Transactional	Egypt	
	2090	Stakeholder Participation, Capacity Building and Awareness Raising on Solid Waste Practices (GAM)	€ 500,000	Transactional	Jordan	✓

Annex 6. IPAM project complaints initiated by civil society

IPAM reports annually on the list of project complaints it handles. Not all complaints are brought by members of civil society organisations within the EBRD definition. However, the EBRD definition of CSO includes individual activists, and many IPAM complaints are brought by individuals in a personal capacity and by businesses. A breakdown analysis of the source of complaints is set out in IPAM's annual report.

Table 8: List of IPAM cases received and processed between 2020 and 2025, submitted by a CSOs

Case Number	Case Name	CSO Name	Filing as Requester	Filing on behalf of affected body	Status as of Q4 2025	Country	Proposed case study country
2025/10	Bishkek Public Transport Project Extension	Bishkek Smog Initiative	X		Active - Assessment	Kyrgyz Republic	
2025/09	Almaty International Airport Exp	Green Salvation	X		Active – Assessment	Kazakhstan	
2024/05	KAZREF II - Shokpar Wind	Biodiversity Research and Conservation Center (BRCC) Community Trust	X		Active – Problem Solving	Kazakhstan	
2024/03	Main Roads Reconstruction Project	NVO Grbalj-Bulevar	X		Active – Compliance Assessment	Montenegro	
2024/02	Regional Gasification Project	CEE Bankwatch, Center for Environmental Research and Information "Eko-svest -Skopje	X			North Macedonia	
2024/01	Zarafshon Wind	CEE Bankwatch	X		Closed	Uzbekistan	Y
2023/09	Indorama Agro Capex Loan	Uzbek Forum		X	Active – Compliance Review	Uzbekistan	Y
2023/06	Toplana Zenica d.o.o.	Eko Forum Zenica	X		Closed	Bosnia & Herzegovina	
2022/02	DFF Adriatic Metals	IGC (NGG) Tristionica and Boriva Nature Park		X	Active Compliance Review	Bosnia & Herzegovina	
2021/03	Maritsa East Mine	CEE Bankwatch		X	Active – Compliance Review	Bulgaria	
2021/01	Belgrade Solid Waste PPP (Request # 2)	A11, CEE Bankwatch		X	Active -Agreement Monitoring	Serbia	
2020/02	Lydian (Amulsar Gold Mine) - Extension	EE Bankwatch, EcoLur, Forest of Armenia, Green Armenia, Armenia Environmental Front		X	Active Compliance Review	Armenia	Y
2020/01	North-South Corridor (Kvesheti-Kobi) Road Project	National Trust of Georgia	X		Active Compliance Review	Georgia	

Annex 7. EBRD institutional reporting on civil society engagement

The evaluation will review the EBRD's reporting on civil society engagement takes place through various channels, all of which will be used to gather information about EBRD's engagement with civil society. Sources include:

- Sustainability Report
- CSE newsletters,
- CSE quarterly reports to the Board,
- AIP/CSE joint report to the Board on Board-level CSO engagement
- CSE report on the Annual Meeting Civil Society Programme,
- BCV and Advisor Visits BTORs,
- IPAM annual reports
- Individual project assessment reports (IPAM)
- Reports to Board on the Public Invitation to comment on strategies and policies
- ESP reporting
- AIP reporting
- Country Strategy Delivery Reviews
- SEP reporting ESAP reporting on projects, annually

In the future, the Impact team plans to include updates on civil society engagement in the annual Impact report.

Annex 8. Case study selection

Table 9: Criteria for sampling

Internal criteria	External criteria
1. SCF priority, EBRD Board expressed specific interest (e.g. Ukraine)	1. Representation of a country from each EBRD region (SEMED, CA, SEE, CEB)
2. IPAM cases, ESD SEP projects with CSOs or TC capacity building with CSOs - examples of EBRD's civil society engagement in last 5 years (2020-2025) (important for illustrative purposes, Management suggested B&H, Croatia, Ukraine and Uzbekistan)	2. Representation of Least Advanced Transition Economies (EBRD definition)
3. EBRD Board Consultation Visit in 2026 - EBRD engagement is fresh with CSOs	3. Representation of conflict affected countries
4. Representation of country not covered recently in IEvD evaluations –to provide fresh insights	4. Representation of both free and more restricted countries according to the 2025 Freedom House Index
5. Number of Cat A investment operations 5+	5. Representation of EU accession country or EU country

Civil society engagement activities are highlighted in CSO quarterly newsletters, for example public consultations on new country strategies (see Annex 4 for list). Engagement via project-client owned Stakeholder Engagement Plans is less clear for the purposes of sampling.

The sample selection from is set out in the table below. In depth case studies will be chosen for three countries after discussion with the CSE and RO teams to ensure feasibility within the timeframe.

Table 10: Sample selection for case study countries

Country	EBRD Region	LAT	Conflict Affected	2025 Freedom House Index Free	EU or EU access. country	Board advisor meeting 2026	EBRD BCV 2026	EBRD Capacity building TC with CSOs	EBRD IPAM complaint underway	5+ Cat A ops	EBRD No recent IEvD coverage	Case study brief or in depth
Mongolia	CA	•		•		•				•	•	•
Uzbekistan		•					•		•	•		•
Tajikistan		•	•								•	
Kazakhstan		•						•		•		
Kyrgyz Rep		•	•						•			
Croatia	CEB			•	•		•					•
Slovenia				•	•						•	
Armenia	T&C	•	•						•		•	•
Türkiye					•			•		•		•
B&H	SEE				•		•		•		•	
Egypt	SEMED	•								•		•
Jordan		•	•					•		•	•	•
Lebanon		•	•								•	
Tunisia		•									•	
Ukraine	UKR		•		•			•		•		•