

October 2, 2013

**Comments from Japan and Spain on CTF grant funding to finance gender assessments on CTF projects being implemented through EBRD**

Dear CIF admin unit,

Regarding gender assessment project by EBRD targeting Ukraine, Turkey and Kazakhstan, we have 2 questions:

1) The e-mail from CIF secretariat says "As a result, CTF district heating projects in Kazakhstan do not fall within the priority regions identified by the Bank or the key focus areas of engagement".

Does this mean that this gender assessment is not prioritized in Kazakhstan?  
What is the implication of the above statement?

2) In TOR, the number of projects seems inconsistent (please see our comment for details) Could you elaborate the number?

I am appreciated if you answer the questions above.

Thank you for your cooperation.

Regards,  
Aiko Iguchi, MOF Japan

October 7, 2013

**Comments from Canada on CTF grant funding to finance gender assessments on  
CTF projects being implemented through EBRD**

Dear Patricia,

Canada welcomes the EBRD's efforts to mainstream gender in its CTF programming, though does not support the specific request for grant funding to recruit consultants to carry out gender assessments for CTF projects in Turkey, Kazakhstan and Ukraine. Given that the EBRD's Strategic Gender Initiative identifies Turkey and Central Asia as countries/regions in which the Bank's initial gender efforts are to be focused, we were surprised to see the request for CTF funding in Turkey and Kazakhstan; as for the request for the Ukraine project, it does not seem to be excluded from the EBRD's gender efforts, which are to be "predominantly" but not exclusively in the identified countries/regions. The proposed assessments also seem consistent with the EBRD's Strategic Gender Initiative's channels of engagement. More generally, as an Implementing Agency and Partner of the CIF's, it is important that the EBRD does its utmost to uphold the CIF's decision to mainstream gender, as it does for other key CIF policies.

Canada therefore requests that the EBRD withdraw its request for specific gender funding for CTF projects in Turkey, Kazakhstan and Ukraine. Should the EBRD wish instead to discuss its proposal further, Canada proposes that this discussion be held during the CTF Committee Meeting later this month.

Kind regards,

Michelle Kaminski  
Foreign Affairs, Trade and Development Canada  
Government of Canada

October 7, 2013

**Comments from Sweden and Spain on CTF grant funding to finance gender assessments on CTF projects being implemented through EBRD**

Dear Patricia and colleagues,

Sweden and Spain encourage the EBRD's gender mainstreaming efforts. However, we share Canada's view with regards to the specific request for grant funding to carry out the proposed gender assessments in Turkey, Kazakhstan and Ukraine.

Therefore, we support Canada's proposal, asking the EBRD to withdraw its request for specific gender funding for CTF projects in Turkey, Kazakhstan and Ukraine. If the EBRD would wish to, we are also open to discuss this proposal further at the CTF Committee Meeting in Washington.

Best regards,

Åsa Wiberg  
Department for Multilateral Development Cooperation  
Ministry for Foreign Affairs  
Sweden

and

Aize Azqueta Quemada  
Spain

October 7, 2013

**Comments from Germany on CTF grant funding to finance gender assessments on CTF projects being implemented through EBRD**

Dear Andreas and CIF Admin unit,

Pls find attached our comments concerning the project proposal. We are generally quite supportive of the additional resources needed to carry out gender assessments, but the proposal raised a number of questions.

Kind regards  
Annette Windmeisser

## **Gender Assessment of Clean Technology Fund Projects in ECA, Kazakhstan, Ukraine, and Turkey (EBRD)**

Germany welcomes the efforts made to include a gender differentiated approach in the design of EBRD/CTF projects and thanks the EBRD for submitting ToR and Gender Assessment Grant Requests for the projects being implemented in Kazakhstan, Ukraine, and Turkey.

We are also convinced that a gender assessment is prerequisite for adequate consideration of gender equality, and differing roles, perceptions and needs in the design and implementation of CTF projects.

However, in order to approve the proposals, we would appreciate to get more clarification on a number of issues regarding certain questions of sustainability if MDBs externalise gender related work. Please see below our questions/comments:

### **1. Cost of SGI for EBRD projects**

What costs does EBRD generally associate with gender consultants/internal gender experts when implementing their Strategic Gender Initiative in projects and how does this relate to the proposed additional costs for the CTF grants? How does this proposed engagement fit in EBRD's SGI?

### **2. Sustainability of gender assessments**

When, as in this exceptional case, gender assessments are carried out by consultants, special care must be taken to ensure sustainability of the assessed gender issues during project implementation. In particular technical gender expertise has still to be included in the project implementation team, transfer of developed knowledge and intelligence and adequate consideration of the consultants findings in project design and implementation have to be guaranteed. What steps will be undertaken to ensure this transfer of knowledge/sustainability?

### **3. Setting a precedent**

We appreciate the efforts made by EBRD to include a gender assessment in CTF co-financed projects taking a different than the usual route. We would strongly underline that we expect that recovering normal project related costs such as gender assessments should not set a precedent for future projects. Rather, a gender differentiated approach should be included in all project designs from the beginning. Gender should generally not be on top but part and parcel of project preparation costs.

October 23, 2013

**Canada comments/request for extension: CTF grant funding to finance gender assessments on CTF projects being implemented through EBRD in the Kazakhstan, Turkey and the Ukraine**

Dear Patricia,

While Canada limited its initial comments on the EBRD's funding request, given the proposal has been resubmitted for consideration, and consistent with Canada's strong support for mainstreaming gender meaningfully in the CIFs, Canada would appreciate having an opportunity to have the EBRD address a couple of outstanding questions. We recognize other CTF Trust Fund Committee Members' preference to not add this item to next week's full meeting agenda and therefore propose a call with the CIF Admin Unit and the EBRD to help us better understand two important aspects of the proposal with the view to informing our decision of whether to support the proposals. As such, we request a postponement to the decision, to allow this call to take place and to finalize the Canadian position shortly thereafter.

Specifically, we have two general questions for the EBRD. First, we understand that the proposed assessments do not qualify as project preparation given the advanced state of the projects development; thus, if approved, they would require special funding from the Admin Unit, though this amount would be part of the approved IP amounts. In its October 18th response to comments, the EBRD notes the projects will be retrofitted to incorporate the findings of the gender assessments. Given the project cycles are well advanced, we would like EBRD assurances that the assessments will be able to meaningfully influence project designs. This assurance is key to our support, as is an explanation of how the retrofitting would be done. Second, in EBRD's October 18th response, the Bank states that CTF funding is sought as (some of/all?) the proposed gender assessments "go beyond the gender mainstreaming levels required under CTF practice"; we would appreciate the EBRD elaborating on this point, as it could help inform our position on this exceptional request. Finally, if the exceptional requests were to be approved, we would expect monitoring during project implementation and after project completion, with reports prepared and submitted to the Trust Fund Committee, to help inform gender mainstreaming within the CIFs.

We look forward to participating in the requested call.

Kind regards,

Michelle

October 4, 2013

**Response of CIF AU to Japan and Spain on CTF grant funding to finance gender assessments on CTF projects being implemented through EBRD**

Dear Aiko Iguchi

Please see EBRD's response to your question below:

1. The e-mail from the CIF Administrative Unit refers to the fact that for EBRD, Kazakhstan is not a priority country with respect to gender as the gender gaps have not been assessed to be as large as in other countries. EBRD's limited resources have been directed towards countries where the gaps are considered to be larger. Thus EBRD is requesting resources from the CIF to finance the gender assessment work in Kazakhstan.
2. In total EBRD is aiming to undertake 10 project-level gender assessments in CTF sub-projects within both the municipal and environmental infrastructure (MEI) and financial institutions (FI) sector. The exact numbers of project-level gender assessments is not known at this point but it is expected that up to 3 assessments will be conducted in district heating in Kazakhstan, up to 5 assessments in the financial intermediaries in Turkey and up to 2 assessments in district heating in the Ukraine.

If you have any additional comments or questions please feel free to reach out to us again.

Kind regards,

CIF Administrative Unit

October 18, 2013

**Response of EBRD on Approval by mail: CTF grant funding to finance gender assessments on CTF projects being implemented through EBRD in the Kazakhstan, Turkey and the Ukraine - Update**

Dear all

Please find attached comments from EBRD to the comments from members of the CTF Trust Fund Committee.

Many thanks in advance for your consideration. Please do not hesitate to contact me should you have any questions.

We would be grateful if CIF-Au could post these comments to the website.

With kind regards

Andreas

Andreas Biermann  
Senior Manager  
Energy Efficiency and Climate Change  
European Bank for Reconstruction and Development



## **EBRD Response to Comments from Members of CTF Trust Fund Committee on the Grant Request**

*“Gender Assessment of Clean Technology Fund Projects in ECA, Kazakhstan, Ukraine, and Turkey (EBRD)”*

**18-10-2013**

### **CONTACTS**

Elena Ferreras–Carreras, Senior Gender Adviser, EBRD – [ferrerae@ebrd.com](mailto:ferrerae@ebrd.com)

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### **GENERAL COMMENTS FROM EBRD**

#### *Scope of the EBRD’s Strategic Gender Initiative (SGI)*

The EBRD Strategic Gender Initiative (SGI) commits to allocating resources to support EBRD’s work on gender. This support allows the EBRD to focus on those countries in its region of operations where the gender gaps have been assessed to be greatest (a gender gap assessment was undertaken by the Chief Economist Office jointly with the Gender Team prior to the SGI). The SGI has three pillars, covering the promotion of:

- Access to employment and skills;
- Access to services; and
- Access to finance.

#### *Country Coverage*

The three countries in question are in different categories regarding the SGI. First, Turkey is a priority country under the SGI, but even there the EBRD has to carefully choose where to prioritise its support – in the financial sector this allocation has been focused mainly on the establishment of dedicated credits lines for female entrepreneurs (see: <http://www.ebrd.com/pages/news/press/2012/121109a.shtml>) which has been under implementation since November 2012.

Kazakhstan’s CTF relevant gender gaps are only considered significant in the area of employment and otherwise are considered not to be significant enough to warrant allocating EBRD resources.

Ukraine is not a priority country for any sector, as the gender gaps are not considered to be significant enough.

#### *Resource Allocation*

Beyond the specific country focus, the SGI also has an overall resource envelope that reflects the mandate and resources of the EBRD. Resources for gender work were therefore allocated under the SGI for a specific number of projects per year, with clear targets. None of the projects presented to the CTF were foreseen at the time of this prioritisation exercise, and a number of them were already under implementation. Nevertheless, the EBRD’s Gender team has considered ways to enhance mainstreaming of gender into them, but will require additional resources to do so. They would therefore at present be handled in a way that addresses CTF requirements but does not go beyond them. The purpose of the present application was to enable the team to go beyond the CTF requirements and ensure enhanced mainstreaming efforts in these projects, in line with EBRD policy to mobilise funds through our donor relationships.

#### *Timing of the Request*

EBRD’s SGI was only passed by the EBRD Board in April 2013, enabling the EBRD to scale up its activities and consider further rolling out gender mainstreaming. All of the projects proposed to be covered in Turkey and Kazakhstan predate in their design and initial internal approvals the adoption of the SGI. This has led to an unfortunate situation in which gender mainstreaming activities have to be retrofitted into these projects. While we could make requests as part of specific future submissions, this may not be timely enough to enable us to do this important work.

## EBRD RESPONSE TO SPECIFIC COMMENTS FROM TFC MEMBERS

### *Canada's Comments*

Canada's Comment:

Canada welcomes the EBRD's efforts to mainstream gender in its CTF programming, though does not support the specific request for grant funding to recruit consultants to carry out gender assessments for CTF projects in Turkey, Kazakhstan and Ukraine.

[...]Canada therefore requests that the EBRD withdraw its request for specific gender funding for CTF projects in Turkey, Kazakhstan and Ukraine. Should the EBRD wish instead to discuss its proposal further, Canada proposes that this discussion be held during the CTF Committee Meeting later this month.

### EBRD Response

We believe that the response is based on a misunderstanding of the SGI, and we are afraid that we are therefore not in a position to withdraw this request, since we do not believe that if we did that we would be working towards our intention to fully mainstream gender in the CTF projects we undertake.

Canada's Comment:

Given that the EBRD's Strategic Gender Initiative identifies Turkey and Central Asia as countries/regions in which the Bank's initial gender efforts are to be focused, we were surprised to see the request for CTF funding in Turkey and Kazakhstan; as for the request for the Ukraine project, it does not seem to be excluded from the EBRD's gender efforts, which are to be "predominantly" but not exclusively in the identified countries/regions.

### EBRD Response

The SGI does not work on a regional, but rather a country basis. So while most countries in Central Asia are experiencing large gender gaps, Kazakhstan's specific large gaps are in sectors not relevant for the EBRD's CTF investment with the exception of employment and firm ownership. Please refer to page 12 of the SGI document: <http://www.ebrd.com/downloads/sector/gender/strategic-gender-initiative.pdf>

Furthermore, the municipal key projects where gender would be of relevance predate both the SGI and the CTF gender requirements in their design and approval dates, and we have to retrofit gender considerations into the project design of sub-projects.

While the SGI would open a possibility to work outside the priority countries, it needs to be clarified that this can only be done by using external resources for the purpose. The word 'predominantly' here should not be misconstrued as negating the prioritisation. It should also be clear that allocating limited internal resources to non-priority countries will automatically reduce the EBRD's ability to affect large gender gaps in priority countries, and this does not appear a desirable outcome.

Canada's Comment:

The proposed assessments also seem consistent with the EBRD's Strategic Gender Initiative's channels of engagement. More generally, as an Implementing Agency and Partner of the CIF's, it is important that the EBRD does its utmost to uphold the CIF's decision to mainstream gender, as it does for other key CIF policies.

#### EBRD Response

EBRD will of course continue to mainstream gender, in line with the requirements from the CTF/SCF Trust Fund Committee, and the approved decisions on its operations. The present request for funding is going beyond these requirements. EBRD will try to access bilateral donor funding should the request to CTF be refused, but there is no guarantee that this will be successful, and it is also expected to lead to delays in project implementation.

#### ***Sweden/Spain's Comments***

Sweden/Spain's comment:

Sweden and Spain encourage the EBRD's gender mainstreaming efforts. However, we share Canada's view with regards to the specific request for grant funding to carry out the proposed gender assessments in Turkey, Kazakhstan and Ukraine.

Therefore, we support Canada's proposal, asking the EBRD to withdraw its request for specific gender funding for CTF projects in Turkey, Kazakhstan and Ukraine. If the EBRD would wish to, we are also open to discuss this proposal further at the CTF Committee Meeting in Washington.

#### EBRD Response

We are grateful for the encouragement. Please see our response to Canada's comments for the call on us to withdraw the request.

#### ***German Comments***

Germany welcomes the efforts made to include a gender differentiated approach in the design of EBRD/CTF projects and thanks the EBRD for submitting ToR and Gender Assessment Grant Requests for the projects being implemented in Kazakhstan, Ukraine, and Turkey.

We are also convinced that a gender assessment is prerequisite for adequate consideration of gender equality, and differing roles, perceptions and needs in the design and implementation of CTF projects.

However, in order to approve the proposals, we would appreciate to get more clarification on a number of issues regarding certain questions of sustainability if MDBs externalise gender related work. Please see below our questions/comments:

#### EBRD Response

We are grateful for this very constructive response and the helpful comments, which we address in more detail below.

#### **Cost of SGI for EBRD projects**

What costs does EBRD generally associate with gender consultants/internal gender experts when implementing their Strategic Gender Initiative in projects and how does this relate to the proposed additional costs for the CTF grants? How does this proposed engagement fit in EBRD's SGI?

### EBRD Response

All project work on gender is done by consultants in line with the business model of the EBRD and the relative novelty of this work. The EBRD generally recruit firms or individuals for implementing our gender components in project (which includes gender assessment and proposed actions on equal opportunities, access to services or access to finance), that are directly related to our operations. The cost may vary from EUR 75,000 to EUR 200,000, depending on the sector and the extent of the project. Delivering the work in this way is fully in line with the business model of the EBRD, as it is used in other strategic initiatives, such as the SEI.

#### Sustainability of gender assessments

When, as in this exceptional case, gender assessments are carried out by consultants, special care must be taken to ensure sustainability of the assessed gender issues during project implementation. In particular technical gender expertise has still to be included in the project implementation team, transfer of developed knowledge and intelligence and adequate consideration of the consultants findings in project design and implementation have to be guaranteed. What steps will be undertaken to ensure this transfer of knowledge/sustainability?

### EBRD Response

The gender team of the EBRD follows and monitors carefully all projects related to gender, both during implementation and after completion, to ensure continuity and sustainability of our interventions. This includes developing and maintaining a close relationship with the client and the operation leader. Frequent communication to monitor progress, monitoring visits, dissemination of tools, trainings or workshops, drafting of lessons learned and guidance notes for the client are some of the actions that we use on a case by case basis. Thus it is expected that as with other sectors (such as municipal urban transport) lessons learned will be both communicated and disseminated to relevant colleagues and partners and in the end become EBRD practice applied to all relevant clients, regardless of how the initial technical assistance is being delivered.

#### Setting a precedent

We appreciate the efforts made by EBRD to include a gender assessment in CTF co-financed projects taking a different than the usual route. We would strongly underline that we expect that recovering normal project related costs such as gender assessments should not set a precedent for future projects. Rather, a gender differentiated approach should be included in all project designs from the beginning. Gender should generally not be on top but part and parcel of project preparation costs.

### EBRD Response

With the recently approved SGI, EBRD has undertaken a major step in order to mainstreaming gender into its operations and to include gender equality as part of its mandate and transition methodology. This is of course a long term process that includes awareness raising, training of the OLs, dissemination of tools to mainstream gender in the EBRD's way of doing business, and increasing internal capacity to carry out all of these tasks.

Carrying out gender assessments has a cost to all institutions. It may be borne by the respective gender team and/or other department, but only when there is a full alignment between the activity and the overarching strategy. These costs need to be included within the project preparation and implementation costs. In this case they were not as the proposed activities go beyond the gender mainstreaming levels required under CTF practice, and/or because the proposed activities and the strategy do not or did not align at the time of project definition.