

November 5, 2013

**Approval by mail: CTF grant funding to finance gender assessments on CTF projects being implemented through EBRD in the Kazakhstan, Turkey and the Ukraine – Comments from United Kingdom**

Dear Patricia,

The UK is pleased to see the thought and effort that has gone into the initial gender analysis of these three CTF initiatives, and the clear identification of specific issues which require further more detailed investigation. We recognise that this might require a more substantive approach than that required from a simple gender assessment or standard mainstreaming approach.

We agree with comments raised by other donors regarding the sustainability of externalising gender assessments, and the remaining ambiguity over whether the countries and sectors specified are indeed covered by the EBRD's Strategic Gender Initiative. In particular, the broader concerns that any new projects, or retrofitting of old ones will be regarded as a 'special case' - which we do not believe is consistent with the spirit of establishing either a proactive strategy to address gender gaps in priority sectors and countries, nor of commitments to mainstream gender.

However, the two gender assessments of the CIFs have acknowledged that the CTF poses the greatest challenge to date in integrating gender. This has been confirmed by the gender team at the World Bank energy think tank, ESMAP, through which an urgent need for detailed examples and case studies of integrating gender in CTF projects has been identified. With this proviso, the proposal from EBRD and the detailed nature of this specific analysis is **well placed to add substantively to the international body of knowledge in this area**, and as described will add significantly to developing understanding of what constitutes best practice in integrating gender into the CTF. There is not a well established body of knowledge in this field, and particularly that needed to enable a successful link to be made between the gender issues identified by the EBRD in these projects, and designing successful implementation strategies.

We are reassured by EBRD's stated commitments to ensure broad dissemination of the lessons from these studies, and to ensure that they become integral to best practice in the design and implementation of future programmes. We would hope that with the support of the CIF admin unit, and EBRD's current role as chair of the MDB gender committee, that these commitments will extend to the other MDBs as well. We suggest that the **ToRs** include:

1. recommendations on measuring the gender impacts identified through these studies, and
2. a poverty and exclusion lens to their analysis, while also
3. doing case studies from a few projects

4. a clearer breakdown of the budget, specifying the number of people and person days proposed for the analysis, and the daily rates applied to both national and international personnel.

We also recommend that:

1. project teams subsequently collect relevant data to strengthen the evidence base around co-benefits, and
2. that the CTF and EBRD be more comprehensive with regard to the implementation of the recommendations from these analyses into the projects, and include indicators that track progress and results, and
3. the EBRD disseminate the findings widely, helping to integrate the findings into the CTF and the CIFs more broadly, including through the MDB gender group.
4. The new gender expert in the CIF admin unit ensure that any future requests do not aim to replicate or duplicate any of the work covered within this proposal.

Discussions over the past year on the need for greater gender support for the CIFs have been met by assurances from the MDBs that their gender policies and capacity are sufficient to ensure gender is integrated appropriately into projects and programmes. Partners subsequently agreed that a gender expert in the CIF admin unit could effectively address any gaps or support issues that might arise. We are pleased to hear that the post is expected to be filled by the end of this year.

Best Regards

Simon

Sent on behalf of Kirsty Mason – Travelling today.

Simon Foster

Department for International Development | 22 Whitehall London SW1A 2EG | T: + 44 (0)20 7023 1416

October 24, 2013

**CTF grant funding to finance gender assessments on CTF projects - comments posted**

Dear Åsa, dear Michelle and colleagues

Please find attached a response from EBRD to your comments and questions on the application.

With kind regards

Andreas  
Andreas Biermann  
Senior Manager  
Energy Efficiency and Climate Change  
European Bank for Reconstruction and Development  
1 Exchange Square  
London EC2A 1JN  
+44207 3387 358  
+44791 2717 658

**EBRD 2<sup>nd</sup> 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)”*

**24-10-2013**

**CONTACTS** Elena Ferreras–Carreras, Senior Gender Adviser, EBRD – [ferrerae@ebrd.com](mailto:ferrerae@ebrd.com)  
Andreas Biermann, Senior Manager, CTF Focal Point, EBRD – [biermana@ebrd.com](mailto:biermana@ebrd.com)

**COMMENT FROM SWEDEN**

**Sweden’s Comment**

Sweden would be prepared to accept the proposal put forward by the EBRD, under the assumption that this is an exceptional request and that the proposed gender assessments go beyond the gender mainstreaming levels required under CTF practice.

**EBRD Response**

As far as EBRD is concerned this request is exceptional. We would in forthcoming projects make specific requests for gender assignments going beyond CTF requirements as part of the project application process and clearly

identify the additional elements and cost there. Regarding the scope of the assignments going beyond required mainstreaming levels, please see the response to Canada below.

October 24, 2013

**CTF grant funding to finance gender assessments on CTF projects - comments posted**

Dear Åsa, dear Michelle and colleagues

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With kind regards

Andreas

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

**24-10-2013**

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

Andreas Biermann, Senior Manager, CTF Focal Point, EBRD – [biermana@ebrd.com](mailto:biermana@ebrd.com)

**COMMENTS FROM CANADA**

**Canada’s Comment**

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.

**EBRD Response**

This is correct, rather than project preparation it would be best to think about these requests as requests for funding technical assistance fully integrated with the project development and implementation.

**Canada’s Comment**

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.

#### **EBRD Response**

The request is covering three different projects.

- 1) The District Heating Modernisation Framework in Kazakhstan (CTF approval January 2011)
- 2) The District Heating Modernisation Framework in Ukraine (extension of an existing EBRD project, submission for approval November 2013)
- 3) The Turkish Residential Energy Efficiency Credit Line framework (CTF approval May 2013)

The District Heating project design for the frameworks in Ukraine and Kazakhstan has progressed substantially, due to the specific circumstances of these projects. In Kazakhstan the framework was launched in 2011, while in Ukraine the proposal is to augment an existing EBRD framework with CTF support (the CTF application will be submitted within the next four weeks). Despite this, because of the nature of the frameworks, it is not too late to undertake the following actions for sub-projects that are now under development:

- i) attempt to put in place a process to assess the relative benefit sharing disaggregated by gender; and
- ii) to identify and assess how employment opportunities may be maximised for women with respect to both the installation and maintenance of the new technology.

With respect to the credit lines, the project has been under design since October 2012, and preliminary discussions with clients to ascertain their fundamental interest in the project have taken place. We are now at a stage where following confirmation of the fundamental interest we can integrate specific gender aspects in the discussions with participating banks and then work on a strategy with them to target women customers so as to increase access to the credit lines for them. In this case, while the development of the technical assistance has progressed substantially already, it is not too late to add gender-specific elements to the consultant assignment at this stage.

We therefore confirm that it is not too late to integrate gender considerations into the project design, with the exception of those sub-projects in Kazakhstan that have already been signed, and where the project implementation is well under way. The gender assessment consultants will regularly inform the project teams on progress and will make recommendations on how additional gender-related measures could be integrated into the projects.

#### **Canada's Comment**

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.

#### **EBRD Response**

The proposed activities go beyond mainstreaming as we are pro-actively trying to create opportunities for women to benefit from the investments, rather than merely ensuring that the investments do not negatively impact them, or confirming benefits that occur in any case.

- i) District Heating Sector  
With respect to the district heating sector this will involve working with both the municipalities and district heating companies to support them in developing improved HR policies that will

promote equal opportunities in the work place, and where appropriate the development of training programmes to ensure that women are able to work in all aspects of service delivery, including engineering. We will further try to understand specific benefits that occur to women within district heating improvement projects, related to increased comfort levels and household bill impacts, and thereby try to find ways to maximise these benefits in future projects.

ii) Credit Lines

With respect to the access to credit lines this will involve identifying new ways of doing business for the banks to access new female customers, such as different approaches to data collection and analysis, information dissemination and marketing. It is expected that this will lead to a more proactive approach by Banks to develop a business stream focused on women entrepreneurs and the women domestic customer base for its credit lines for energy efficient appliances and equipment.

**Canada's Comment**

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.

**EBRD Response**

We confirm that we would monitor the gender impact during and after project implementation, and would prepare specific reports to help inform gender mainstreaming in the CIFs specifically, and in climate finance more generally. The cost for producing these reports and for conducting the monitoring is covered under existing requests to CTF for project supervision and implementation and knowledge management.

**October 24, 2013**

**SV: CTF grant funding to finance gender assessments on CTF projects - comments posted**

Dear Patricia,

Sweden would be prepared to accept the proposal put forward by the EBRD, under the assumption that this is an exceptional request and that the proposed gender assessments go beyond the gender mainstreaming levels required under CTF practice. However, we believe that Canada raises several important issues in their mail below. We would also highly appreciate elaborated answers from the EBRD, particularly regarding how the assessments will be able to meaningfully influence project designs.

Best regards,

Åsa

**Åsa Wiberg**

Department for Multilateral Development Cooperation

Ministry for Foreign Affairs

SE-103 30 Stockholm, Sweden



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 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 it 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 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)  
Andreas Biermann, Senior Manager, CTF Focal Point, EBRD – [biermana@ebrd.com](mailto:biermana@ebrd.com)

### **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.