

EBRD's Environment and Social Policy 5-yearly review

IOSH response to the European Bank for Reconstruction and Development (EBRD) consultation



Submission

06.04.18



Introduction

The Institution of Occupational Safety and Health (IOSH) is the Chartered body for OSH professionals with around 47,000 members in over 130 countries.

We welcome this opportunity to contribute to this important 5-yearly consultation by the European Bank for Reconstruction and Development (EBRD) on its Environmental and Social Policy.

In 2016, IOSH was pleased to sign a Memorandum of Understanding with EBRD formalising our strategic partnership to strengthen the drive to keep employees safe and healthy in emerging Europe and beyond.

In the response that follows, we provide a summary IOSH position, detailed comments, references and information about IOSH.

Summary IOSH position

1. IOSH believes that investment banks, such as EBRD, should actively seek to improve occupational safety and health (OSH) through the standards and requirements they apply to the projects they fund and support
2. We therefore advise that occupational safety, health and wellbeing should be far more prominent throughout EBRD's Environmental and Social Policy, as both a funding criterion overall aim and performance requirement
3. We recommend that EBRD commits to public reporting to a recognised standard, such as the Global Reporting Initiative, and discloses Board member OSH awareness training and access to expertise
4. We advocate that EBRD makes explicit reference to the need to tackle modern slavery and human trafficking throughout its funded projects
5. We would like to see EBRD adopt and advocate international standards such as ISO 45001 (OHSMS); ISO 20400 (Sustainable procurement); and ISO 39001 (Road traffic safety management)
6. We would like to see specific reference to the hierarchy of control and to occupational health issues (such as manual handling, noise, vibration and psychosocial risk) and safety issues (such as work at height, electricity and confined spaces)
7. We recommend that this policy is reviewed more frequently and at least 3-yearly

Detailed comments

EBRD Environmental and Social Policy statement

- IOSH welcomes the opportunity to comment on this important policy and we would like to see a specific section in this document on 'Occupational safety, health and wellbeing', emphasising its crucial role in all of EBRD-funded activities worldwide
- Page 2, para 9 – given the growing problem of labour exploitation, we suggest this should make specific reference to a commitment to tackling modern slavery and human trafficking (see ILO Forced Labour Protocol 2016¹ and IOSH Corporate Social Responsibility web pages²)
- Page 2, para 12 – we suggest consideration is given to adoption of ISO 20400 (Sustainable procurement) principles as good practice³
- Page 3, para 19 – it would be helpful to outline the social criteria for occupational health and safety (OSH) used for these discussions, in line with ISO 45001⁴
- Page 6, para 40 – it would be helpful to state what OSH training EBRD Board members receive and the expertise they can access to inform their decisions (see INDG417⁵)
- Page 6, para 45 – when there are material changes in the nature and the scope of a project and these may lead to materially-different social scenarios from that approved by the Board – we suggest this requires expert health and safety risk assessment
- Page 7, para 46 – we suggest EBRD may wish to report in line with recognised standards such as the Global Reporting Initiative ([GRI](#)), including GRI 403: Occupational Health and Safety⁶
- Page 7, para 55 – given the rapidly changing world of work, we would suggest this review period should be more frequent than 5-yearly, for example, 3-yearly at least

EBRD Performance Requirements

EBRD Performance Requirement 1 – Assessment and Management of Environmental and Social Impacts and Issues

- Page 11, para 3 (2nd bullet) – we recommend this should refer to applying the 'hierarchy of control', consistent with ISO 45001, rather than the 'mitigation hierarchy' as currently

EBRD Performance Requirement 2 – Labour and Working Conditions

- Page 19, para 24-25 – we suggest modern slavery and human trafficking should be referenced here. We would also like to see reference to significant occupational health and wellbeing issues (as well as safety)

EBRD Performance Requirement 4 – Health and safety

- Page 26, paras 12-16 – we suggest this section is titled 'Occupational safety, health and wellbeing', to emphasise the need to manage risks to mental and physical health at work

- Page 26, para 13 (OHS) – we suggest this refers to the hierarchy of control with ‘elimination’ as the first option, followed by ‘substitution’ and so on (consistent with ISO 45001), rather than the ‘mitigation hierarchy’. The training for workers should include awareness of significant health and safety risks and controls, reporting requirements and emergency plans. It will also need to take account of any literacy and language issues
- Page 26, para 19 (specific requirements for H&S management) – should read “into consideration *health and safety risks*” and should highlight the need to manage risks from activities involving work at height, electricity and confined spaces
- Page 26, para 21 – should read “may threaten the *health and safety*”
- Page 27, para 22-24 (hazardous materials safety) – again, suggest reference to the hierarchy of control
- Page 27 – suggest new paragraphs covering other OHS hazards, particularly related to occupational health, such as manual handling, noise, vibration and psychosocial risk (see IOSH Occupational health toolkit⁷)
- Page 27, para 29-30 (traffic and road safety) – in addition to the current text, we suggest there is alignment with ISO 39001 (Road traffic safety management systems),⁸ to incorporate current good practice

References

1. International Labour Organisation. *ILO Standards on Forced Labour – The new Protocol and Recommendation at a Glance / International Labour Office, Fundamental Principles and Rights at Work Branch (FUNDAMENTALS)*. Geneva: ILO, 2016.
www.ilo.org/wcmsp5/groups/public/@ed_norm/@declaration/documents/publication/wcms_508317.pdf
2. IOSH. *IOSH Corporate Social Responsibility* web pages www.iosh.co.uk/About-us/What-we-are-up-to/Corporate-Social-Responsibility.aspx
3. International Organization for Standardization. *ISO 20400: 2017, Sustainable Procurement – Guidance*. ISO: Geneva, 2017. www.iso.org/standard/63026.html
4. International Organization for Standardization. *ISO 45001: 2018, Occupational health and safety management systems – Requirements with guidance for use*. ISO: Geneva, 2018.
www.iso.org/iso-45001-occupational-health-and-safety.html
5. Health and Safety Executive. *Leading health and safety at work* (INDG 417, rev1). HSE Books: Sudbury, 2013. www.hse.gov.uk/pubns/indg417.pdf
6. Global Reporting Initiative. *GRI 403: Occupational Health and Safety*. GRI: Amsterdam, 2016.
www.globalreporting.org/standards/gri-standards-download-center/gri-403-occupational-health-and-safety/ [currently under review]
7. IOSH. *IOSH Occupational health toolkit*, www.iosh.co.uk/books-and-resources/our-oh-toolkit.aspx
8. International Organization for Standardization. *ISO 39001: 2012, Road traffic safety (RTS) management systems – Requirements with guidance for use*. ISO: Geneva, 2012.
www.iso.org/standard/44958.html

About IOSH

Founded in 1945, the Institution of Occupational Safety and Health (IOSH) is the largest body for health and safety professionals in the world, with around 47,000 members in over 130 countries, including over 13,000 Chartered Safety and Health Practitioners. Incorporated by Royal Charter, IOSH is a registered charity, and an ILO international NGO. The IOSH vision is

“A safe and healthy world of work”

The Institution steers the profession, providing impartial, authoritative, free guidance. Regularly consulted by Government and other bodies, IOSH is the founding member to UK, European and International professional body networks. IOSH has an active research and development fund and programme, helping develop the evidence-base for health and safety policy and practice. Summary and full reports are freely accessible from our website. IOSH publishes an international peer-reviewed journal of academic papers twice a year titled Policy and practice in health and safety. We have also developed a unique UK resource providing free access to a health and safety research database, as well other free on-line tools and guides, including resources for business start-ups; an occupational health toolkit; and a risk management tool for small firms.

IOSH has 41 Branches worldwide, including the Caribbean, Hong Kong, Isle of Man, Oman, Qatar, the Republic of Ireland, Singapore and UAE, 18 special interest groups covering aviation and aerospace; broadcasting and telecommunications; construction; consultancy; education; environment and waste management; financial services; fire risk management; food and drink industries; hazardous industries; health and social care; offshore; public services; railway; retail and distribution; rural industries; sports grounds and events; and theatre.

IOSH members work at both strategic and operational levels across all employment sectors. IOSH accredited trainers deliver health and safety awareness training to all levels of the workforce from shop floor to managers and directors, through a professional training network of over 2,000 organisations. We issue around 180,000 certificates per year.

For more about IOSH, our members and our work please visit our website at www.iosh.com. Our new five-year strategy can be viewed at www.ioshwork2022.com and our resources specifically tailored for business can be found here www.iosh.co.uk/ioshmeansbusiness.

Please direct enquiries about this response to:

Richard Jones, Head of Policy and Public Affairs
The Grange, Highfield Drive
Wigston
Leicestershire
LE18 1NN
Tel: 0116 257 3100
Email: consultations@iosh.com