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Working Party on Export Credits and Credit Guarantees

EXPORT CREDITS AND THE ENVIRONMENT: RESPONSES TO THE REVISED QUESTIONNAIRE ON MEMBERS' PROCEDURES AND PRACTICES REGARDING OFFICIALLY SUPPORTED EXPORT CREDITS AND THE ENVIRONMENT - AS OF 25 NOVEMBER 2005

This document cancels and replaces the same document of 7 December 2005 to correct an editing error in the response from Portugal to question 1 b).

Contact: Mr. Julian PAISEY, Tel: +33 (0)1 45 24 99 23; Fax: +33 (0) 1 44 30 61 58
Email: julian.paisey@oecd.org, cc: xcred.secretariat@oecd.org

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**EXPORT CREDITS AND THE ENVIRONMENT:
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AND THE ENVIRONMENT - AS OF 25 NOVEMBER 2005**

I Introduction

1. At their 101st Meeting in April 2004, the Members of the OECD Working Party on Export Credits and Credit Guarantees (ECG) agreed that the survey questionnaire on their procedures and practices regarding the environmental review of officially support export credits should mirror more closely the provisions of the 2003 *OECD Recommendation on Common Approaches on Export Credits and the Environment* (hereinafter called 'the OECD Recommendation') [TD/ECG(2005)3]. Subsequently, the ECG Members reached agreement at the end of 2004 to a strengthened questionnaire in the form of the *Revised Questionnaire on Members' Procedures and Practices regarding Officially Supported Export Credits and the Environment* (hereinafter called 'the Revised Questionnaire').

2. ECG Members were initially requested to complete the Revised Questionnaire in advance of their 103rd Meeting in April 2005, after which a final version of responses, as at 6 April 2005, was made publicly available through the OECD Web site.

3. In preparation for the 105th Meeting of the ECG in November 2005, the Secretariat recalled that the responses to the Revised Questionnaire should be updated on an on-going basis and, therefore, requested Members to review their responses and to notify the Secretariat of any changes in their procedures and practices.

4. Accordingly, at Annex 1 are the updated responses, as at 25 November 2005, which comprise responses from 27 of the 29 ECG Members¹ to the Revised Questionnaire and demonstrate their commitment to comply with the OECD Recommendation.

¹ Ireland has no official export credit programme and Mexico has reported that it is not able to provide detailed replies to the Questionnaire as in the past years it has had little demand for medium- long-term cover and, therefore, nothing of substance to report. The Czech Republic has previously provided a supplementary comment that EGAP's responses cover the Czech Republic's entire policy since legislation obligates the Czech Export Bank to have EGAP's insurance, except for cases of international institutions' financing or other ECAs' cover where the Czech Export Bank relies on their EIA.

ANNEX 1

OECD MEMBERS' PROCEDURES AND PRACTICES: OFFICIALLY SUPPORTED
EXPORT CREDITS AND THE ENVIRONMENT

REVISED QUESTIONNAIRE

1- UPDATE OF ENVIRONMENTAL GUIDELINES

	Countries	1. New/Latest Environmental Guidelines
		a) When was the last review/update of environmental guidelines conducted in your officially supported export credits system and what was the motivation for it (e.g. compliance with the OECD Recommendation, etc)?
1	Australia	EFIC's Environment Policy was reviewed during 2004 and resulted in some changes which were implemented in May 2005. The review was foreshadowed when the Policy was originally implemented in 2000.
2	Austria	OeKB's environmental guidelines and procedures were updated to incorporate the changes resulting from the OECD Recommendation, as adopted by the OECD Council on 18 December 2003 [C(2003)236], and have been in force since 1 April 2004.
3	Belgium	The environmental guidelines were introduced in January 2002, in compliance with the 2001 Common Approaches and modified according to the OECD Recommendation of 18 December 2003; the last modification was made in December 2004.
4	Canada	EDC's internal procedures were updated to conform with the OECD Recommendation in 2004. EDC's Draft Environmental Review Directive and Disclosure Policy and new Environmental Policy will all be finalized in Q4, 2005 to reflect: <ul style="list-style-type: none"> a) updated internal procedures; b) EDC's commitments in response to the Report by the Auditor General of Canada; c) EDC's experience to date with implementation; and d) Public comments on draft policies.
5	Czech Republic	The last update was conducted in January 2004, in compliance with the OECD Recommendation [C(2003)236].
6	Denmark	The environmental guidelines have been updated recently to reflect the OECD Recommendation. In addition, EKF is adjusting its procedures to incorporate the Equator Principles.
7	Finland	The environmental policy was updated in May 2004 to reflect the current OECD Recommendation.
8	France	A new <i>ex-ante</i> disclosure policy for Category A projects came into force in April 2004 for compliance with the OECD Recommendation.
9	Germany	Implementation of the OECD Recommendation was effected from 1 st of January 2004.

	Countries	1. New/Latest Environmental Guidelines
		a) When was the last review/update of environmental guidelines conducted in your officially supported export credits system and what was the motivation for it (e.g. compliance with the OECD Recommendation, etc)?
10	Greece	ECIO's Environmental Guidelines were adopted in January 2002 in order to reflect the 2001 Common Approaches.
11	Hungary	The last update of the Hungarian ECAs' Environmental Policies took place in May 2005, after regular annual review.
12	Italy	In December 2003 Italy's guidelines were adapted to accord with the OECD Recommendation [C(2003)236].
13	Japan	JBIC's latest environmental guidelines came into effect on 1 October 2003. NEXI's current environmental guidelines were updated in April 2002 to comply with the 2001 Common Approaches and came into full effect in October 2003. Japan's environmental guidelines (since October 2003) are in compliance with the OECD Recommendation of 18 December 2003.
14	Korea	KEIC introduced its first environmental guidelines on 30 November 2000 and revised them on 1 October 2005 to comply with the OECD Recommendation. KEXIM: after being revised on 1 July 2004 to comply with OECD Recommendation, KEXIM's environmental guidelines were recently updated again on 6 July 2005 to mainly incorporate the role of our newly established environmental advisory office.
15	Luxembourg	The environmental guidelines were introduced in January, 2002, in compliance with the OECD Recommendation.
16	Netherlands	On the basis of the outcome of the review in 2003 and the new OECD Recommendation of the same year, the environmental guidelines of 2001 have been adjusted and implemented on 1 September 2004.
17	New Zealand	The environmental guidelines have been updated recently to reflect the OECD Recommendation.
18	Norway	The last review was conducted on 13 February 2003; since then, our environmental guidelines have been in compliance with the OECD Recommendation of 18 December 2003.
19	Poland	Environmental policy has been in force since January 2002.
20	Portugal	Taking into account compliance with the updated OECD Recommendation, COSEC conducted a review of the Portuguese environmental guidelines, which is in force since January 2005.
21	Slovak Republic	The last review was conducted on 9 August 2004, in compliance with the OECD Recommendation.
22	Spain	Spain introduced environmental guidelines in February 2002. The main features of our policy have remained stable ever since. Minor changes have been introduced since the adoption of the OECD Recommendation. At the end of 2004 we adopted a new disclosure policy for Category A projects, in compliance with the OECD Recommendation.
23	Sweden	EKN (Swedish Export Credits Guarantee Board) revised its environmental policy, guidelines and procedures as from 1 July 2004. These are in compliance with the OECD Recommendation. SEK's (Swedish Export Credit Corp) environmental guidelines were reviewed in June 2004 in order to be in compliance with the OECD Recommendation.
24	Switzerland	April 2004, compliance with OECD Recommendation.

	Countries	1. New/Latest Environmental Guidelines a) When was the last review/update of environmental guidelines conducted in your officially supported export credits system and what was the motivation for it (e.g. compliance with the OECD Recommendation, etc)?
25	Turkey	As the environmental guidelines of Turk Eximbank (TE) were introduced as of 11 May 2004, no review/update was conducted.
26	United Kingdom	ECGD introduced environment screening in January 2000. A statement of Business Principles and revised impact assessment procedures were introduced in December 2000. These were streamlined in April 2003 when disclosure of ECGD's consideration of Category A cases was also introduced. The description of ECGD's Case Impact Analysis Process posted on ECGD's Web site was updated in May 2004 to incorporate the requirements of the OECD Recommendation.
27	United States	The US Ex-Im Bank officially revised the 1998 version of its Environmental Procedures and Guidelines on 1 July 2004. This revision followed a review period of five months. The reason for taking this action to revise the Bank's former set of Environmental Procedures and Guidelines was to ensure that they complied with the OECD Recommendation.

	Countries	1. Environmental Guidelines: modifications foreseen b) Are there modifications foreseen in the near future (legislative review, etc.)?
1	Australia	No.
2	Austria	No further modifications are foreseen in the near future. Necessary adaptations to react to EU Directive, 2003/4/EC will be considered after definition of the legal basis. In the middle term future the next update is expected after the review of the OECD Recommendation by the ECG in 2006.
3	Belgium	We do not foresee any major modification in the near future; however, we adapted our environmental policy according to new developments and experience (last amendment: December 2004).
4	Canada	EDC will modify its policies and procedures, if required, to reflect any changes to the Recommendation resulting from the 2005 revision process.
5	Czech Republic	No.
6	Denmark	A review of the Equator Principles, and thereby EKF's policy, is expected in connection with IFC's implementation of redrafted Policy and Performance Standards.
7	Finland	No immediate modifications are foreseen.
8	France	The existing EUR 20 million threshold for <i>ex post</i> transparency will be lowered to EUR 10 million starting 1 January 2005; the new threshold will apply to the reporting, on our website, for the projects undertaken during the 4 th quarter of 2004.
9	Germany	We do not foresee any modifications in substance as we have applied the OECD Recommendation since 2004. However, we are currently discussing whether we will merge the Recommendation and the national environmental guidelines (which foresee some additional criteria <i>e.g.</i> the screening of short term business) into one document.
10	Greece	Yes. We are going to make certain modifications, according to the OECD Recommendation.
11	Hungary	The Hungarian Environmental Policies are subject to regular revision and further development, if needed.
12	Italy	No modifications foreseen for the time being.
13	Japan	JBIC verifies the status of the implementation of the guidelines and, based on its findings, will conduct a comprehensive review of the guidelines within five years of their enforcement. NEXI's guidelines will be reviewed, when necessary, taking into account future progress in the review of the OECD Recommendation and the status of the implementation of NEXI's guidelines.
14	Korea	KEIC: No modifications are foreseen. KEXIM: no major modification is foreseen in the near future.
15	Luxembourg	We do not foresee any major modification in the near future; however, we adapt our environmental policy according to new developments and experience.
16	Netherlands	Transparency might be further reviewed as a result of the implementation of the Directive 2003/4/EC of the European Parliament and of the Council on public access to environmental information.
17	New Zealand	No.

	Countries	1. Environmental Guidelines: modifications foreseen
		b) Are there modifications foreseen in the near future (legislative review, etc.)?
18	Norway	Review is foreseen by Autumn 2005, experience and needs will be taken into account.
19	Poland	Yes. After the next review of the OECD Recommendation, which will be conducted in 2006.
20	Portugal	Yes. After the next review of the OECD Recommendation, which will be conducted in 2006.
21	Slovak Republic	No.
22	Spain	No specific changes are foreseen. Our intention is to carry out an on-going review of our system in order to keep it up to date with legislative/technical developments.
23	Sweden	EKN plans a comprehensive review in 2006. SEK does not foresee any revision in the near future.
24	Switzerland	Currently no major modifications foreseen.
25	Turkey	No modifications are foreseen in the near future.
26	United Kingdom	No imminent changes are foreseen, but ECGD will review its procedures in the light of the new IFC Performance Standards (to be published in early 2006) and any changes in the Common Approaches resulting from the 2006 revision process.
27	United States	Eximbank will update its policies and procedures, as needed, to reflect any changes to the Common Approaches resulting from the 2006 revision process.

2- SCREENING PROCESS

Countries	2. Screening Process: steps
	a) What are the steps involved in the screening process (e.g. pre-screening form, questionnaire, automatic screening system, further screening questionnaire, etc.)?
1	Australia New transactions are manually screened by EFIC for environmental risk and are classified accordingly.
2	Austria Environmental impact and social aspects are covered in OeKB's environmental assessment procedure, according to the OECD Recommendation. OeKB's screening procedure consists of the following steps: 1) Pre-screening; to single out "projects" as opposed to non-projects like consumer goods, bulk ware, etc. Questions within the application form cover basic project information and specifically ask if a sensitive sector or location is involved. 2) Screening; to identify projects according to their environmental sensitivity on the basis of environmental questionnaires (OeKB has developed five separate questionnaires for this purpose covering the sectors of thermal power plants, dams and hydroelectric power plants, iron and steel, pulp and paper and one of a general format to cover all other applications). 3) Classification into Category A, B or C; to determine the appropriate type of review and assessment.
3	Belgium Screening is based upon answers to a special questionnaire included in the application form. For projects classified in Category A (EIA if not already provided) and B (extensive questionnaire) further information has to be provided.
4	Canada Standard screening questions are integrated in the internal transaction-processing system for medium- and long-term transactions (MLT Program). Questions are answered based on available information with requests for additional information made as necessary for each transaction.
5	Czech Republic Questionnaire, classification into Category A, B, and C by the underwriter and assessment by external environment consultants, if necessary.
6	Denmark All applications are screened based on a questionnaire in the application form.
7	Finland All guarantee applications, with a repayment period of two years or more, are screened based on the information received in the environmental questionnaire and project description. Additional information is requested on case-by-case basis if needed for screening.
8	France A pre-screening form (including information on the project's location) has to be completed for all applications.
9	Germany Screening of the application (application form and project description). If necessary, request for further information on a case- by-case basis.
10	Greece Screening is based on information derived from the application form and we require extra information if it is needed.
11	Hungary All medium- and long-term applications are filtered with a short pre-screening questionnaire. Screening with a detailed Environmental Questionnaire is applied in all cases other than those exempted (supplemented with follow-up questions where necessary).

	Countries	2. Screening Process: steps a) What are the steps involved in the screening process (e.g. pre-screening form, questionnaire, automatic screening system, further screening questionnaire, etc.)?
12	Italy	Every application form includes an environmental screening questionnaire to be filled in by the exporter. The screening questionnaire, together with the application form, allows a preliminary categorisation and identifies the need for further information.
13	Japan	JBIC: questionnaire (“Screening Form”) to the borrower and the internal analysis of information submitted by the borrower/related parties. NEXI requires applicants to submit a Screening Form at the stage of pre-commitment of NEXI’s trade insurance.
14	Korea	KEIC conducts screening by questions in the screening form. Additional information may be requested if KEIC deems the questions in the screening form not enough to screen the project. KEXIM: Pre-screening form; screening based on a completed form provided by KEXIM. Additional information can be demanded on a case- by-case basis.
15	Luxembourg	Screening is based upon answers to a special questionnaire included as an annex in the application form. For projects classified in Category A (EIA. if not already provided) and B, (extensive questionnaire) further information has to be provided.
16	Netherlands	All applications are pre-screened. The applications for transactions above EUR 10 million and the environmentally sensitive transactions below that threshold highlighted by the pre-screening will additionally be screened by means of a more specific environmental review form. Based on the information provided through the review form the applications are classified. In addition, depending on the classification and the specific characteristics of the transaction or the project, further information is required.
17	New Zealand	All applications are screened based on a questionnaire in the application form.
18	Norway	Initial screening based on application form. Additional information is demanded when necessary.
19	Poland	Screening process covers all the applications. The applicant is obliged to fill up the Environmental Questionnaire which constitutes an integral part of application form. The questionnaire consists of two parts: part A is the first step of the screening (pre-screening) for all the projects, part B has to be completed for Category A and B projects as well as projects in sensitive areas.
20	Portugal	Environmental and social-cultural impacts are considered in our screening, which is based on the application for cover and takes basically into account the following elements: <ul style="list-style-type: none"> - Identification and destination of the goods and services linked to the project (whenever is possible); - Identification of the project, sector and location; - Credit term; - Total amount of the project; - Contribution of the Portuguese part for the total amount of the project; - Identification of other participating countries and respective contribution for the total amount of the project.

	Countries	2. Screening Process: steps
		a) What are the steps involved in the screening process (e.g. pre-screening form, questionnaire, automatic screening system, further screening questionnaire, etc.)?
21	Slovak Republic	Pre-screening: all transactions fulfilling one of these criteria – threshold value, sensitive sector, sensitive location – are to be screened by the special questionnaire, which is integral part of the application.
22	Spain	All applicants must fill in a generic environmental questionnaire. For project or project-related goods, applicants or – preferably - exporters must fill in a detailed sector-specific questionnaire. The interface with applicants/exporters is an automatic screening tool. If, from the information provided by the applicant/exporter, we detect any potential uncontrolled environmental impact, we continue the review through direct contact with the exporter.
23	Sweden	EKN conducts preliminary screening by questions in the application form and further screening by a separate environmental questionnaire.
24	Switzerland	Pre-screening: all transactions are screened using a checklist mechanism of sensitive sectors and sensitive locations on the application form. This allows underwriters to tentatively classify transactions into Category A, B and C
25	Turkey	TE requires initial information about environmental impacts via a standard form at the time of official application. TE has the right to require any further environmental information, at any time during the lifetime of the project.
26	United Kingdom	ECCGD considers the full range of sustainable development impacts. The standard application forms contain a number of questions relating to both environmental and social impacts. Based on the answers provided, plus information obtained from other sources, cases are then categorised into one of three categories. Category C cases (low potential impact) will not normally be scrutinised further. Category B cases (medium potential impact) will require an Impact Questionnaire to be completed for analysis. Category A cases (high potential impact) will require a formal environmental impact assessment, social impact assessment and/or a resettlement action plan to be submitted for analysis.

	Countries	2. Screening Process: steps a) What are the steps involved in the screening process (e.g. pre-screening form, questionnaire, automatic screening system, further screening questionnaire, etc.)?
27	United States	<p>All applications for financial coverage exceeding USD 10 million or requesting a repayment term greater than seven years must be accompanied with a completed Environmental Screening Document (external screening form). The external screening form requests information sufficient to enable Ex-Im Bank to environmentally categorise the transaction in accordance with the OECD Recommendation and thereby determine the scope of environmental review (i.e., whether additional information and/or an EIA should be submitted). All the completed external screening forms are reviewed by an Ex-Im Bank environmental Practitioner, who is responsible for categorising the underlying transaction.</p> <p>For applications for transactions having a principal liability under USD 10.0 million and a repayment term of two years or more, an Internal Environmental Screening Document (internal screening form) is completed by the Ex-Im Bank credit officer and forwarded to one of Ex-Im Bank's Environmental Practitioners who determine (consistent with the OECD Recommendation) whether or not the application for support (loan, insurance or financial guarantee) relates to a project, and, if so, whether it is located in a sensitive area, as defined in Annex I of the OECD Recommendation. Ex-Im Bank Loan officers obtain the information needed to complete the internal screening form either directly from information contained in the application to Ex-Im Bank, or by querying the applicant when information received is ambiguous or insufficient to determine the location of the project.</p>

	Countries	2. Screening Process: scope
		b) What are the scope and criteria for screening? Please provide details if the parameters for screening deviate from those set out by the OECD Recommendation?
1	Australia	Consistent with the OECD Recommendation.
2	Austria	A pre-screening/scrutinizing step is applied for all applications above EUR 1 million. The purpose of this “watchful eye approach” is to ensure that all potentially environmental sensitive projects are properly identified and to avoid reputational risks. Above EUR 10 million all applications are screened after formal submission of the full environmental questionnaire.
3	Belgium	Screening is made according to the OECD Recommendation, <i>i.e.</i> classification in Category A, B or C. In Category A, an EIA has to be provided; for Category B projects, an extensive questionnaire is foreseen.
4	Canada	In accordance with the OECD Recommendation.
5	Czech Republic	According to the OECD Recommendation
6	Denmark	The screening is based on information on the total project (<i>i.e.</i> sector, size, purpose, location, who is involved). Sometimes EKF will request additional information in order to classify the application.
7	Finland	In accordance with the OECD Recommendation.
8	France	All transactions are screened through two main criteria, which are the amount of the transaction (threshold of EUR 10 million) and whether or not the project’s location is sensitive from an environmental point of view. If one of these two criteria is met, the applicant has to complete an environmental questionnaire.
9	Germany	We screen the application according to the criteria set out in the OECD Recommendation. In addition, we also screen short term capital goods.
10	Greece	We screen the application according to the criteria set out in the OECD Recommendation.
11	Hungary	Scope and parameters do not deviate from those in the OECD Recommendation.
12	Italy	No deviation from the OECD Recommendation.
13	Japan	JBIC follows the parameters set out by the OECD Recommendation. NEXI screens all medium- long-term businesses to be insured including Export Credit Insurance.
14	Korea	KEIC: in accordance with the OECD Recommendation. KEXIM: in accordance with the criteria set out by the OECD Recommendation.
15	Luxembourg	In accordance with the OECD Recommendation. Scope of screening: identification of potential adverse environmental impacts of projects in sensitive sectors or located in sensitive areas. Criteria for screening: depend on the answers to an environmental questionnaire, <i>i.e.</i> whether the project is classified under cat. A, B or C. Projects classified in cat. A will require an EIA. For projects classified in cat. B, we send a detailed questionnaire that could lead to the request of an EIA. Projects classified in cat. C require no further action.
16	Netherlands	In accordance with the OECD Recommendation.
17	New Zealand	The screening is based on information on the total project (<i>i.e.</i> sector, size, purpose, location, who is involved). ECO may request additional information in order to classify the application.

	Countries	2. Screening Process: scope b) What are the scope and criteria for screening? Please provide details if the parameters for screening deviate from those set out by the OECD Recommendation?
18	Norway	In accordance with the OECD Recommendation.
19	Poland	According to the OECD Recommendation.
20	Portugal	We follow the parameters for screening that are set out in the OECD Recommendation.
21	Slovak Republic	In accordance with the OECD Recommendation.
22	Spain	As set out in the OECD Recommendation, we screen all applications with a credit term of two years or more. We do not establish a value threshold.
23	Sweden	EKN applies no threshold for initial screening. In principle a threshold of SEK 100 million and a repayment term of two years or more apply to further screening and review. However, projects with sensitive locations or similar are screened and reviewed regardless of transaction value or duration of repayment term.
24	Switzerland	Pre-screening applies to all transactions. The threshold for further screening is CHF 10 million. (about SDR 6 million.); all projects in Category A and B exceeding this threshold undergo further screening via an environmental questionnaire.
25	Turkey	Screening process is executed in accordance with the OECD Recommendation.
26	United Kingdom	The scope and criteria for screening are similar to those of the OECD Recommendation except that ECGD screens all civil, non-aerospace applications and does not use any value thresholds. These are described in detail in the Case Impact Analysis Process available on the ECGD Web site.
27	United States	The scope and criteria for screening of applications for Ex-Im Bank's financing are consistent with the OECD Recommendation. However, while the OECD Recommendation stipulates a value of SDR 10 million as the threshold above which all transactions are screened with a view to classifying them with respect to identifying their potential for environmental effects, Ex-Im Bank has adopted the value of USD 10 million, a threshold that is lower than the equivalent SDR. Consistent with the OECD Recommendation, Ex-Im Bank's criteria for screening applications having a value of less than USD 10 million is to identify those transactions within this range that 1) reflect an underlying project, and 2) are located in or near a sensitive area. Ex-Im Bank screens ALL transactions having a repayment term of two years or greater.

	Countries	2. Screening Process: exemptions c) Please provide details on any exemptions from screening (e.g. applications already assessed by other entities, etc.).
1	Australia	There are currently no exemptions from the screening process.
2	Austria	Consumer goods are not screened. Arms and military goods, nuclear plants and equipment thereof are also not screened as they cannot be covered by export guarantees of the Austrian Government. There are no further exemptions from screening.
3	Belgium	Traditional short term business is exempted. For transactions being reinsured by ONDD, ONDD will generally rely on the screening made by the Principal Insurer if the Principal Insurer follows the OECD Recommendation.
4	Canada	None.
5	Czech Republic	No.
6	Denmark	No exemptions from screening.
7	Finland	In a re-insurance situation, Finnvera may follow screening conducted by the principal insurer, if it is an OECD Export Credit Agency (ECA).
8	France	Aircraft, Aerospace and Defence sectors.
9	Germany	In reinsurance cases, we rely on the screening of the first insurer, if the first insurer is an OECD-ECA.
10	Greece	Short term business.
11	Hungary	Short-term business whole turnover transactions are exempted. Applications already assessed by other entities (if they are applying the OECD Recommendation) may be exempted.
12	Italy	Reinsurance transactions where another OECD-ECA is the lead insurer are not screened or reviewed by SACE, relying on the environmental review carried out by the leader ECA. Small (below EUR 2.5 million) multi-client transactions exclusively covering documentary credits are not screened.
13	Japan	JBIC: there are none. NEXI: in the case of re-insurance, if the project has been reviewed by a primary insurer, NEXI confirms its review results and therefore exempts the screening process.
14	Korea	KEIC: if other OECD-ECAs, the World Bank Group or other equivalent institutions have already conducted the screening process, KEIC may not do this. KEXIM: no exemptions from screening
15	Luxembourg	Transactions being reinsured by ODL are also exempted, as we rely on the screening made by the Principal Insurer if the Principal Insurer follows the Common Approaches.
16	Netherlands	Exempted from coverage of the scope of Environmental Guidelines are: <ul style="list-style-type: none"> - Applications of which the environmental impact already have been assessed by other Dutch governmental entities. - Applications for exchange risk or bond cover when the credit risk is not insured. - Military equipment. - Aircraft.
17	New Zealand	No exemptions from screening.

	Countries	2. Screening Process: exemptions
		c) Please provide details on any exemptions from screening (e.g. applications already assessed by other entities, etc.).
18	Norway	If World Bank or other similar institutions are involved GIEK will normally follow their evaluation.
19	Poland	None.
20	Portugal	In principle we may accept applications already assessed by other entities (e.g. the first insurer in a Re-insurance Agreement).
21	Slovak Republic	If other similar institutions are involved EXIMBANKA SR will normally follow their evaluation.
22	Spain	No exemptions.
23	Sweden	In EKN's system, goods and services not related to any project are exempted.
24	Switzerland	Goods not related to any concrete project, <i>i.e.</i> where end-buyer not known (e.g. textile machinery) are exempted. Apart from Category C projects, the following exemptions from review apply: rolling stock, telecommunications, health care with the exception of radiology equipment or entire healthcare facilities.
25	Turkey	Some of the programmes of TE by definition involve official support less than two years, resulting in being automatically "screened-out" without the submission of our standard form. For the rest of our programmes, the exporter may submit any environmental review carried out by an International Financial Institution or another ECA at the time of application to TE.
26	United Kingdom	Aerospace and Defence (sharp arms) are exempt from environmental screening (but are subject to other national screening arrangements).
27	United States	Irrespective of any screening and classification of applications relative to projects already addressed by other countries, Ex-Im Bank screens ALL applications having a repayment term in excess of two years.

	Countries	2. Screening Process: responsibilities
		d) Who is responsible for screening the application (ECA – underwriter, environmental practitioner, Guardian Authority, other government department, environmental consultancy)?
1	Australia	The EFIC underwriter performs the initial screening. EFIC's Technical and Environmental staff review the initial screening before formal commitments are made.
2	Austria	OeKB is responsible although applicants are encouraged to check the environmental impact of their projects, including a preliminary categorisation in order to predict the required documentation and data for the environmental assessment already at an early stage. Within OeKB, the environmental practitioners are responsible for the screening, although also underwriters are trained on environmental matters and invited to participate in the screening.
3	Belgium	The underwriter.
4	Canada	EDC's Environmental Advisory Services team identifies all project-related transactions and is responsible for categorization and sensitive area determinations.
5	Czech Republic	EGAP – the underwriter.
6	Denmark	The applications are screened by the underwriter, if needed in cooperation with the environmental practitioner and EKF's external environmental consultant.
7	Finland	ECA - environmental practitioner.
8	France	ECA – underwriter, with support of the environmental practitioners on specific cases regarding potential sensitivity of a project's location.
9	Germany	The ECA – the underwriter in close co-operation with an environmental expert.
10	Greece	The underwriter and the environmental expert with the cooperation of an outsourcing environmental consultant.
11	Hungary	ECAs' in-house team (including sales manager and environmental practitioner) is responsible for screening the application. Outside expertise may be applied on a case by case basis.
12	Italy	ECA - environmental practitioner
13	Japan	JBIC (loan department) is responsible for screening the application NEXI: the underwriters are initially responsible for screening projects. The environmental practitioners will assist the underwriters when required.
14	Korea	KEIC: the underwriter/lender KEXIM: environmental practitioners
15	Luxembourg	The underwriter is responsible for screening the application if needed with an external environmental consultant.
16	Netherlands	Environmental practitioner
17	New Zealand	The applications are screened by the ECO's underwriting agent and, if required, we anticipate that this will be done in cooperation with an environmental practitioner and an external environmental consultant.
18	Norway	The underwriter and/or consultants in corporation with the responsible bodies within GIEK.
19	Poland	Preliminary screening has to be done by an applicant. Final screening is KUKE's responsibility based on the questionnaire answers.
20	Portugal	The responsibility for screening the application is the ECA-underwriter.

	Countries	2. Screening Process: responsibilities d) Who is responsible for screening the application (ECA – underwriter, environmental practitioner, Guardian Authority, other government department, environmental consultancy)?
21	Slovak Republic	The underwriter.
22	Spain	The ECA – Environmental Practitioner - is responsible for the screening, based on information provided by the applicant or the exporter.
23	Sweden	In EKN the underwriter is responsible for screening. When necessary EKN's in-house environmental analyst is consulted.
24	Switzerland	Pre-screening: underwriter; screening: environmental practitioner
25	Turkey	The application will be screened with regard to the potential environmental impacts by the relevant department of TE.
26	United Kingdom	The environmental practitioners in ECGD's Business Principles Unit are responsible for screening applications.
27	United States	For applications for which Ex-Im Bank's liability will be USD 10 million or greater, the applicant for Ex-Im Bank financing, (<i>e.g.</i> , the commercial bank underwriter, the exporter or the foreign buyer), is responsible for submitting an Environmental Screening Document (external screening form). The Ex-Im Bank's Environmental Practitioners is responsible for categorizing the project, commensurate with the criteria recommended within the OECD Recommendation. The external screening form requests information regarding project relatedness, project size, industrial sector, location and certain known environmentally related aspects of the project that could affect its subsequent environmental classification in accordance with the OECD Recommendation, by Ex-Im Bank. For applications for which Ex-Im Bank's liability will be under USD 10 million, the environmental screening is conducted using an Internal Environmental Screening Document (internal screening form). The loan officer is responsible for completing the internal screening form based on information contained in the application (or, if necessary, solicited from the applicant). The internal screening form is then forwarded to the Environmental Practitioner for classification in accordance with the OECD Recommendation.

	Countries	2. Screening Process: short term business (optional) e) In your screening procedures, is any short-term business addressed? If so, please describe how.
1	Australia	EFIC does not provide short-term credit insurance. Performance bond and Working Capital Guarantee transactions are currently screened in accordance with the requirements of EFIC's Environment Policy.
2	Austria	When screening all project related applications larger than EUR 1 million, short term business is included only to some extent to avoid major environmental and social risks and to identify potential reputational risks. The type of project, the sector concerned, and the buyer country play a role in the selection under our "watchful eye" procedure.
3	Belgium	Not applicable
4	Canada	All short-term project-related transactions supported within the MLT program are categorized.
5	Czech Republic	No. Screening process applies to the MLT business only.
6	Denmark	-
7	Finland	-
8	France	Yes. There is no difference in our screening procedures between short-term transactions and medium- and long-term transactions (same criteria are applied).
9	Germany	Short term business (capital goods) is part of the same screening process as medium- and long-term business in order to identify possible adverse effects of such projects, <i>i.e.</i> large-scale greenfield projects and projects in or near sensitive areas.
10	Greece	No.
11	Hungary	Short term individual transactions are pre-screened and filtered out routinely, while the short term whole turnover transactions are exempted by rules.
12	Italy	Transactions with a repayment term below 24 months (monthly progress payments) but that would normally qualify as medium- long-term projects are screened and reviewed on a voluntary basis.
13	Japan	JBIC does not deal with short term business. NEXI: screening of short term business is exempted from NEXI's Guidelines.
14	Korea	KEIC/KEXIM: no
15	Luxembourg	Short term project related transactions are categorized.
16	Netherlands	All credit insurance, manufacturing insurance and investment insurance for account of the Dutch State including short term transactions will be screened. In all cases the same screening procedures apply as under the Recommendation. Please note, however, that short term transactions that can be covered in the private market are excluded from government support.
17	New Zealand	Not applicable – short term business is not undertaken by the ECO.
18	Norway	Yes, the same procedure as for medium-long-term business.
19	Poland	As a rule, short term business is exempted from the Screening Process.
20	Portugal	No.
21	Slovak Republic	Short term business is exempt from screening.
22	Spain	Under review.

	Countries	2. Screening Process: short term business (optional) e) In your screening procedures, is any short-term business addressed? If so, please describe how.
23	Sweden	When EKN recognises a customer or a project with high reputational risk or environmental risk this business will be scrutinised before possible issuing of guarantee. This also includes short term business.
24	Switzerland	Short term business is treated the same as medium- long-term business
25	Turkey	No.
26	United Kingdom	ECGD's screening procedures are applied to all civil, non-aerospace business. Although this does not include traditional commodity short term business, it does include all business that is eligible for medium- or long-term support even if the cover being requested is only for the short term.
27	United States	Ex-Im Bank does not formally screen applications for short term financial support unless they are identified by the loan officer as being within the nuclear sector. However, Ex-Im Bank will decline short term support for certain chemicals and pesticides that are banned or severely restricted within the U.S; these chemicals are listed in an annex of Ex-Im Bank's Environmental Procedures and Guidelines.

	Countries	2. Screening Process: identification of projects
		f) Do you identify and assess the projects to which the capital goods and services for which official credit support has been requested, relate? If so, under what circumstances?
1	Australia	Subject to the OECD Recommendation, EFIC attempts to identify and assess the impacts of underlying projects.
2	Austria	Yes. In general, the whole project is identified to which the application is related (it is assessed for all screenings of projects > EUR 10 million).
3	Belgium	We may identify overall projects during the screening process. The screening of the overall project depends on the nature of the project.
4	Canada	Yes, in all circumstances. EDC's definition of project is focussed on the destination of exported goods and services in the foreign jurisdiction.
5	Czech Republic	EGAP does not assess the whole project which we understand is the responsibility of the main insurer. Anyway, we require to have the respective information submitted to the main insurer. In case EIA is required, we accept the EIA acknowledged by the main insurer.
6	Denmark	All applications are screened and classified based on the nature of the total project, irrespective of the type of supplies or the share of the project EKF is asked to cover.
7	Finland	Yes, the application falls within the scope of Finnvera's environmental review if it involves a project (the capital goods or services can form part of the project). Projects involve <i>e.g.</i> the construction of new production facilities (greenfield projects) and extensions of existing ones, that increase capacity, effluent or emission quantities and/or levels, or the use of raw materials or natural resources. Work carried out in sensitive areas or in their vicinity also constitutes a project.
8	France	For all transactions we identify at the screening stage the overall projects to which the capital goods and services are related, which will be assessed during the environmental review process.
9	Germany	Euler Hermes identifies and assesses related overall projects. The need for and the extent of the assessment of the overall project depends on the type of project.
10	Greece	We may identify the overall projects, but it depends on the type of project.
11	Hungary	Yes, on a case-by-case basis.
12	Italy	The project is identified since the screening questionnaire <i>inter alia</i> asks questions on the project of destination. The assessment detail of the project is tailored on the basis of the relevance of the related export to the project itself. Transactions below SDR 10 million not located in sensitive sites/areas and stand alone machineries are not normally further reviewed. Transactions in defence, telecommunication (where no infrastructures are foreseen) and aerospace sectors are not further reviewed.
13	Japan	JBIC: it depends on the case. NEXI: if the capital goods form a major part of the project (<i>e.g.</i> turbine, boiler for a thermal power plant), the plant as a whole may be subject to a review. Generally, efforts will be made to obtain information on whether or not it may be directly relevant to the portion NEXI is required to support. However, it will be heavily reliant on the insurance applicant's leverage over the project sponsor.

	Countries	2. Screening Process: identification of projects f) Do you identify and assess the projects to which the capital goods and services for which official credit support has been requested, relate? If so, under what circumstances?
14	Korea	KEIC: if the capital goods supported by KEIC are the major or core part of the project, KEIC may consider identifying and assessing the project. KEXIM: yes, KEXIM identifies and assesses the related projects. The need and extent of the identification and assessment of the related projects depend on the type of the projects.
15	Luxembourg	We may identify overall projects during the screening process. The screening of the overall project depends on the nature of the project.
16	Netherlands	Yes, all the projects to which the capital goods and services for which official credit support has been requested, relate, will be identified and assessed. If there is no direct link with a project or there are several future projects for which the equipment will be used, then the activit(y)/(ies) the supplies will be used for, the buyers environmental policy, the track record with regard to the environment etc. will be taken into account as far as possible and reasonable.
17	New Zealand	All applications are screened and classified based on the nature of the total project irrespective of the type of supplies or the share of the project that ECO is asked to cover.
18	Norway	Yes, if exported goods are related to identified/specific projects.
19	Poland	All relationships are assessed on a case-by-case basis.
20	Portugal	The need for and the extent of the assessment of the overall project depends on the type of project and the ECA involvement.
21	Slovak Republic	Projects are classified into three categories, <i>i.e.</i> A, B and C, considering the extent and the degree of adverse environmental impacts. Classification and sector consideration correspond to that of the OECD recommendation.
22	Spain	We always seek to know whether exported goods and services are related to a project. If they are, our screening and cover decisions will focus on the project, as far as possible. Exemption to this rule may be made when Spanish exports represent less than 10% of the project.
23	Sweden	The assessment of the goods or services itself, as well as the assessment of the project are part of EKN's environmental due diligence for projects applicable to the OECD Recommendation.
24	Switzerland	ERG always attempts to identify the project when the following criteria apply: the sector or location are sensitive
25	Turkey	To the extent possible, TE tries to identify the projects to which capital goods and services relate. Such efforts are concentrated when the requested support is above the threshold.
26	United Kingdom	ECGD attempts to identify and then assess the environmental and social impacts of all the overseas projects to which the UK capital goods and services are destined.

	Countries	<p align="center">2. Screening Process: identification of projects</p> <p>f) Do you identify and assess the projects to which the capital goods and services for which official credit support has been requested, relate? If so, under what circumstances?</p>
27	United States	<p>For all transactions for which repayment term is excess of two years, Ex-Im Bank's screening forms (external and internal) are designed to capture information as to whether the application relates to an underlying project. If the transaction covers the sale of capital goods or services destined for a project (as opposed to that of a buyer's ongoing general operations), Ex-Im Bank requires that the underlying project, its size, location, industrial sector and certain environmental characteristics be identified in the screening document. For applications greater than USD 10 million, the environmental effects of the underlying project are then reviewed and evaluated, commensurate with the OECD Recommendation, irrespective of Ex-Im Bank's financial share of the total cost of the underlying project. For applications less than USD 10 million, only those projects identified as having a potential effect on a sensitive area are evaluated.</p>

3- CLASSIFICATION

	Countries	3. Categories used when classifying projects a) Does your classification system vary from that of the OECD Recommendation (<i>i.e.</i> Categories A, B and C)? If so, please provide details.
1	Australia	No.
2	Austria	No.
3	Belgium	No. We apply the classification system of the OECD Recommendation
4	Canada	No.
5	Czech Republic	No.
6	Denmark	No.
7	Finland	All applications, that are screened to involve projects, will be classified in categories A, B or C in compliance with the Recommendation
8	France	No. We classify project in strict compliance with the OECD Recommendation, including Annex I.
9	Germany	No.
10	Greece	No.
11	Hungary	No. Categories A, B and C do not vary from those of the Recommendation.
12	Italy	No. Possible environmentally friendly projects are categorised as C and then, internally, in a sub-category called D.
13	Japan	JBIC's classification system is in general the same as that of the OECD Recommendation. In addition, there is Category FI for the project that satisfies all of the following: JBIC's funding of the project is provided to a financial intermediary etc; the selection and assessment of the actual sub-projects is substantially undertaken by such an institution only after JBIC's approval of the funding and therefore the sub-projects cannot be specified prior to JBIC's approval of funding; and those sub-projects are expected to have potential impact on the environment. NEXI: no, NEXI classifies projects to Categories A, B and C the same as the OECD Recommendation.
14	Korea	KEIC: No. KEXIM: no. KEXIM applies the classification system of the Recommendation.
15	Luxembourg	No, the classification system of the Recommendation is respected.
16	Netherlands	No
17	New Zealand	No.
18	Norway	No.
19	Poland	No.
20	Portugal	We apply the classification system of the OECD Recommendation.
21	Slovak Republic	No.
22	Spain	No. Our classification system reflects that of the OECD Recommendation
23	Sweden	No. However, in addition to the three categories in the OECD Recommendation, EKN has a fourth category, Category D, which is exports aimed solely at improvement of the environment.

	Countries	3. Categories used when classifying projects
		a) Does your classification system vary from that of the OECD Recommendation (i.e. Categories A, B and C)? If so, please provide details.
24	Switzerland	No.
25	Turkey	No.
26	United Kingdom	ECGD uses the term high/medium/low potential impact rather than Category A/B/C. The categories are virtually equivalent although ECGD does take additional social impacts into account.
27	United States	No. Ex-Im Bank follows the classification system of the OECD Recommendation for transactions in all industrial sectors except nuclear. However, all Nuclear transactions are categorized as "N", and are then sub-classified to determine the scope and extent of environmental review and level of environmental information needed for that review. Nuclear power projects are treated as Category A transactions, but they receive additional review related to health and safety aspects that are associated with the nuclear sector.

	Countries	3. Classification of modifications/extensions to existing projects b) How are modifications/extensions to existing projects classified?
1	Australia	The screening and impact assessment of add-on transactions is related to the impact of the modification/add-on.
2	Austria	The environmental questionnaire asks intentionally if a project is greenfield or not. Modifications/extensions are evaluated on a case-by-case basis. As they nearly always employ modern technology (<i>e.g.</i> reduced emission levels in comparison to existing machinery), as a rule, positive effects on the environment can be expected. However, other effects (such as a significant increase in production capacity, or existing heavily polluting equipment) have to be taken into account as well. As a consequence, we tend to evaluate the whole project as appropriate, including related existing facilities. These projects when involving a sensitive sector tend to be Category B. There is no definition yet of “major extension” as a threshold for Category A.
3	Belgium	On a case-by-case basis, modification/extensions of projects will follow the normal screening process.
4	Canada	EDC’s selection of Category (A,B,C) is reflective of potential for environmental impacts for all projects including modification and extension projects.
5	Czech Republic	In case there is a production increase by 25% or more and the project is in a sensitive sector and/or located in or near a sensitive area, such modification/extension is classified as Category A.
6	Denmark	Modification/extension of an existing project is classified according to the impact of the modification/extension.
7	Finland	Modifications/extensions are screened and reviewed using the same principles as for greenfield projects [see Question 2 f)].
8	France	Classification of modification/extensions of existing projects is considered on a case-by-case basis, depending on significance of the modification and/or extension of the production considered. For extensions, if the sector concerned is a sensitive one (Annex I), the project will be classified as Category A or B, depending on the importance of this extension. Modernisation without any extension will be generally classified as Category B or C, whatever the sector concerned.
9	Germany	Modifications/extensions to existing projects will be classified in accordance with the OECD Recommendation. If they are major extensions in accordance with Annex I, they are classified as Category A, otherwise the classification depends on the potential environmental impact of the extension.
10	Greece	ECIO classifies the modifications/extensions to existing projects using the criteria of the OECD Recommendation.
11	Hungary	Classification is carried out according to the same set of criteria in both new and modification cases.
12	Italy	Classification depends on several considerations: sector and site sensitivity, extent of the modification, addition or not of production capacity, substitution of existing equipment improving the overall environmental performance, etc. The resulting classification can be either Category A, B, or even C and it is assessed on a case-by-case basis.

Countries		3. Classification of modifications/extensions to existing projects
		b) How are modifications/extensions to existing projects classified?
13	Japan	JBIC: they are classified as same way as greenfield projects. NEXI: if modifications/extensions increase the current capacity two times or more, NEXI may judge it as “large scale” extension and classify the project as Category A. If the extension is “small scale” and is to be conducted within the current site (without the need to develop new sites), it may be classified as Category B. Generally, the classification will depend on the projects characteristics, sectors, and surrounding areas.
14	Korea	KEIC: modifications/extensions to existing projects will be classified as new projects according to the impact of modification/extensions regardless of the prior classification of the existing projects. KEXIM: modifications/extensions to existing projects will be classified in accordance with the OECD Recommendation.
15	Luxembourg	On a case-by-case basis, modification/extensions of projects will follow the normal screening process.
16	Netherlands	There are no different requirements for greenfield and add-on projects, <i>i.e.</i> the entire project is classified. In general, the classification in this kind of cases highly depends on the sector.
17	New Zealand	Modification/extension of an existing project is classified according to the impact of the modification/extension.
18	Norway	Same as for new cases/projects.
19	Poland	Modifications are generally treated in the same manner as new projects. Case-by-case approach.
20	Portugal	Modifications/extensions to existing projects are classified in accordance with the Recommendation.
21	Slovak Republic	No modifications (the same requirements for greenfield and add-on projects).
22	Spain	In principle modifications/extensions are screened and classified in the same way as new projects for review purposes, especially if they imply an increase in output, higher use of resources or extension of the location. However, if further investigation or an EIA is deemed necessary, this is taken into account.
23	Sweden	EKN classifies modifications/extensions and environmental review is considered according to the same criteria as for other projects. In cases of major extensions environmental review is always conducted, if Category A or B.
24	Switzerland	This depends on the context. ERG often sees extensions to existing power plants; these are usually assessed like new power plants.
25	Turkey	They are also classified similar to the Illustrative List of the OECD Recommendation should there be a major extension in question. On the other hand, a small-scale modification/extension project in the listed sectors is usually classified as Category B if such modification/extension adds “little” to the existing project and such project is not close to a sensitive site.
26	United Kingdom	ECGD considers replacement of existing equipment or minor modifications to have ‘low potential impact’ (Category C). Significant increases in capacity are ‘medium’ or ‘high potential impact’ (Category B or A) depending on the business sector, etc. ECGD’s review will normally include consideration of the impact of the existing project.

	Countries	3. Classification of modifications/extensions to existing projects b) How are modifications/extensions to existing projects classified?
27	United States.	<p>In keeping with Annex 1 of the OECD Recommendation, Ex-Im Bank classifies all large modifications or major extensions to large projects (for which Ex-Im Bank liability exceeds USD 10 million) as Category A. Projects that do not fall within the scope of those listed in Annex 1 of the OECD Recommendation, which include nominal modifications/extensions to existing projects (and those not located in or near a sensitive area) are classified as Category B, unless they fall within a sector such as aircraft, which are exempt from review and hence classified as Category C.</p>

	Countries	3. Responsibilities for classification c) Who is responsible for the classification of projects (underwriter, environmental practitioner)?
1	Australia	The underwriter performs the initial classification. EFIC's Technical and Environmental staff review the initial classification before formal commitment to the transaction. Complex decisions also involve at least one member of the Executive team.
2	Austria	The department of project and environmental analyses (<i>i.e.</i> the environmental practitioners and not the underwriting department) within OeKB is responsible.
3	Belgium	The underwriter. The classification is reported to our Board of Directors.
4	Canada	EDC's Environmental Advisory Services team
5	Czech Republic	The underwriters, in case of need the external environmental consultants are addressed.
6	Denmark	Category A and B projects are classified by EKF's external environmental consultant.
7	Finland	ECA - environmental practitioner.
8	France	ECA - environmental practitioners
9	Germany	Classification is done by underwriter and environmental expert. The classification is part of the report submitted to the Inter-ministerial Committee.
10	Greece	The underwriter and the environmental expert with the cooperation of an outsourcing environmental consultant.
11	Hungary	ECA - environmental practitioner.
12	Italy	ECA - environmental practitioner
13	Japan	JBIC: the Loan Department is responsible for the classification. NEXI: initially the underwriters will classify projects upon the result of screening. The environmental practitioners will confirm the results and eventually decide its classification.
14	Korea	KEIC: classification is done by the underwriter. If necessary, he/she can conduct it through seeking advice from an external environmental consultant. KEXIM: environmental practitioners
15	Luxembourg	The underwriter. The classification is reported to our Board.
16	Netherlands	The environmental practitioner
17	New Zealand	At this stage the ECO has not been asked to support A and B classified projects, however, we anticipate that Category A and B projects will be classified by the ECO's external environmental consultant.
18	Norway	The underwriter.
19	Poland	The underwriter in cooperation with environmental expert.
20	Portugal	Classification is made by the ECA-underwriter, although our guidelines admit the possible intervention of an environmental expert.
21	Slovak Republic	The underwriter.
22	Spain	ECA - environmental practitioners.
23	Sweden	In EKN the underwriter is responsible for classification. When necessary EKN's in-house environmental analyst is consulted.
24	Switzerland	Below the threshold of CHF 10 million, the underwriter; above the threshold the environmental practitioner.
25	Turkey	The relevant department of TE.

	Countries	3. Responsibilities for classification c) Who is responsible for the classification of projects (underwriter, environmental practitioner)?
26	United Kingdom	The environmental practitioners in ECGD's Business Principles Unit are responsible for categorising cases as having 'high/medium/low potential impacts'.
27	United States	The Ex-Im Bank environmental practitioner is ultimately responsible for the classification of all transactions, including projects. Applicants (<i>i.e.</i> , commercial bank underwriters, US exporters or buyers) and loan officers do <u>not</u> classify (or pre-classify) Ex-Im Bank transactions.

4- ENVIRONMENTAL REVIEW

	Countries	4. Environmental Review: respective roles a) Who is responsible for carrying out the EIA (e.g. exporter, sponsor) and for carrying out the review; please specify any particular practice followed in cases of re-insurance, co-insurance (including with IFIs), sub-deliveries?
1	Australia	EIAs are the responsibility of the sponsor or exporter. Any EFIC involvement in re-insurance or co-insurance transactions would be on the basis that the transaction complies with the requirements of EFIC's Environment Policy and would include the review of any necessary environmental documentation.
2	Austria	Austria considers it the responsibility of the exporter to submit an EIA when asked for. Normally the project owner (sponsor) would have an EIA to be carried out. The environmental review is carried out by OeKB (environmental practitioners). In case of reinsurance we would use the results of the environmental assessment as carried out by the main insurer. With co-insurance we would coordinate assessment work with the respective partners including sharing information. While we in general try to avoid double work, we have to understand the quality and the outcome of the assessment by our partners.
3	Belgium	The exporter/sponsor is responsible for carrying out the EIA. In case of reinsurance, we will rely on the assessment made by the Principal Insurer. In case of co-insurance or generally multi-sourcing, we will take into consideration the assessment made by our partner.
4	Canada	The Project Sponsor is responsible for the EIA in all cases. An independent consultant is often commissioned by the project sponsor to prepare the EIA. EDC is responsible for the review of the EIA and, for Category A projects, EDC will require an independent consultant to opine on the EIA in cases where it was not prepared independently.
5	Czech Republic	The external environmental consultants approved by the Ministry of Environment and accepted by EGAP are responsible for carrying out the EIA (only in case the main contractor is from the Czech Republic). For sub-deliveries, the EGAP requires EIA carried out for the main contractor or a smaller EIA concerning the sub-delivery only. The EIA acknowledged by ECA or IFI concerned is also accepted. Our underwriters, in some cases in cooperation with external environmental consultants, are responsible for carrying out the review.
6	Denmark	The applicant/sponsor must supply an EIA prepared by an independent third party. The review of the environmental documents supplied is carried out by an external environmental consultant paid by EKF. In case of reinsurance and co-insurance, the assessment of the other participants is taken into account, but EKF will always perform its own environmental clearing.

	Countries	4. Environmental Review: respective roles a) Who is responsible for carrying out the EIA (e.g. exporter, sponsor) and for carrying out the review; please specify any particular practice followed in cases of re-insurance, co-insurance (including with IFIs), sub-deliveries?
7	Finland	Normally, project company, sponsor or main contractor is responsible for letting an EIA to be carried out. The applicant provides the EIA to Finnvera. In a co-insurance situation with other OECD ECAs or if there are multilateral financial institutions involved in the project, Finnvera may utilise reviews conducted by these institutions in its own review. In a reinsurance situation, Finnvera may follow the review conducted by principal insurer, if the principal insurer is an ECA from an OECD country. Finnvera's environmental review is carried out by the environmental practitioners.
8	France	The exporter is responsible for providing the EIA, except in case of reinsurance where it is the main insurer's responsibility. In all cases (including re-insurance and co-insurance), the EIA is generally carried out by the buyer/sponsor, or a consultant working for the buyer/sponsor.
9	Germany	The applicant is responsible for providing an EIA. The review of the project is done by Euler Hermes. In cases of reinsurance or multi sourcing, Euler Hermes takes into account the review carried out by another Member or an IFI if their procedure is in accordance with the Recommendation.
10	Greece	The EIA should be carried out by an independent consultant on behalf of the exporter. We have not had up to now any experience for co-insurance and re-insurance cases.
11	Hungary	The applicant is responsible for providing the EIA. In case of one stop shop financing, re-insurance, co-insurance, sub-deliveries the Hungarian ECAs have to cooperate with their partners, and/or may rely on the outcome of the review other ECAs (from OECD countries) conducted.
12	Italy	The EIA must be provided by the applicant to SACE. EIAs can be carried out by project sponsors and/or exporters, directly or through external consultants. The EIA review is carried out by SACE environmental engineers directly or through the advice of an independent consultant. In case of co-insurance, cooperation is sought with other IFIs/ECAs. In case of reinsurance, please see answer 2c.
13	Japan	JBIC: Sponsor is responsible for carrying out the EIA. JBIC is responsible for carrying out the review. NEXI: The project sponsor is responsible for carrying out the EIA.
14	Korea	KEIC: - The applicant is responsible for providing the EIA. The EIA may be carried out by project sponsors and/or applicants and it will then be reviewed by KEIC and/or an external environmental consultant. - In the cases of re-insurance or co-insurance, KEIC will take into account Environmental Review of other ECAs. KEXIM: - Project sponsors/borrowers (or exporters) are responsible for carrying out the EIA and it will be reviewed by KEXIM and/or environmental consultancy. - In cases of re-financing or co-financing, KEXM takes into account Environmental Review of other ECAs or Regional Development Banks.

	Countries	4. Environmental Review: respective roles a) Who is responsible for carrying out the EIA (e.g. exporter, sponsor) and for carrying out the review; please specify any particular practice followed in cases of re-insurance, co-insurance (including with IFIs), sub-deliveries?
15	Luxembourg	In principle the exporter is responsible for carrying out the EIA. The review is done by an external consultant of ODL. In case of reinsurance, we will rely on the assessment made by the Principal Insurer. In case of co-insurance or generally multi-sourcing, we will take into consideration the assessment made by our partner.
16	Netherlands	The responsibility for the environmental studies provided is with the applicant. One of the fundamental principles underlying the environmental component under our export credit insurance facility is the fact that the applicant has to convince Atradius that the project for which cover is requested, will not result in substantial negative environmental impact. The responsibility for the review is with the ECA. In cases of re-insurance, co-insurance (including with IFIs), sub-deliveries the environmental review carried out by an other Member, an IFI or a Member's Development Agency will be taken into account, in accordance with the requirements of the Common Approaches.
17	New Zealand	The applicant/sponsor must supply an EIA prepared by an independent third party. The review of the environmental documents supplied will be carried out by an external environmental consultant paid by the ECO. In case of reinsurance and co-insurance, the assessment of the other participants is taken into account, but ECO will always perform its own environmental clearing.
18	Norway	Exporter is responsible. EIA must be prepared by an independent and reputable consultant, and it will eventually be assessed by GIEK and/or a consultant. In the cases of reinsurance: Case-by-case based on the circumstances.
19	Poland	The EIA is to be provided by the applicant. Review is to be carried by environmental expert. No practice so far.
20	Portugal	The sponsor/exporter is responsible for carrying out the EIA. In principle, COSEC is responsible for carrying out the review. In cases of re-insurance/co-insurance, COSEC takes into account the review carried out by another Member, an IFI, Regional Development Banks or by a Portuguese Development Aid Institution.
21	Slovak Republic	In principle, the exporter (main contractor) is responsible for providing an EIA. EIA is to be, as a rule, elaborated by an independent and reputable environmental entity.
22	Spain	We consider it is the responsibility of the exporter to make sure an EIA is prepared and to provide us a copy of it. If it is a local legal requirement, it would actually be an obligation of the sponsor. However, our requirement will always be addressed both to our insured and to the exporter. The review is carried out in-house, by the Environment Unit. In case of re-insurance, it is the responsibility of the lead insurer to carry out the review. In practice this is done in consultation, and in collaboration, with re-insurers. In cases of co-insurance, the review is done in parallel, in consultation among involved ECAs.

	Countries	4. Environmental Review: respective roles a) Who is responsible for carrying out the EIA (e.g. exporter, sponsor) and for carrying out the review; please specify any particular practice followed in cases of re-insurance, co-insurance (including with IFIs), sub-deliveries?
23	Sweden	<p>The EIA must be produced by an independent and reputable consultant. EKN carries out the review. In reinsurance cases, EKN studies the main insurer's environmental review and environmental information and makes its own assessment on basis of that. It is a requirement for reinsurance from EKN that the other ECA follows the OECD Recommendation. In situations of co-financing EKN shares its reports and assessments with other ECAs and IFIs and studies the environmental review made by them, including EIA.</p>
24	Switzerland	<p>EIA: Primarily the sponsor or the government of the buyer country (in monetary terms), however, usually the actual study is carried out by an environmental consultant. Very rarely the exporter takes a more active role in carrying out the EIA. Review: ERG often with assistance of an independent environmental consultant specialized in the field.</p> <p>Re-insurance, co-insurance: in most cases ERG would accept review of primary ECA or IFI involved, however ERG reserves the right to undertake an independent review if this is deemed necessary (e.g. high reputation risk)</p>
25	Turkey	<p>The exporter is responsible for providing the EIA. TE requires an EIA report approved by the authorized Environmental Institution of the host country and may seek advice from a consulting firm who is a member of FIDIC about the review of EIA Report and type of measures to prevent, minimize, mitigate or compensate for potential adverse impacts of the project. In case of co-financing situation, TE may waive this requirement and respect the environmental review carried out by the participating International Financial Institution or another Export Credit Agency.</p>
26	United Kingdom	<p>ECGD normally expects EIAs to be carried out by an independent consultant on behalf of the project sponsor.</p> <p>EIAs are reviewed either by the environmental practitioners in ECGD's Business Principles Unit or by environmental consultants working for them. When several ECAs or other IFIs are involved in a project it is usual for environmental consultants to review EIAs on behalf of all the financial institutions.</p> <p>For re-insurance cases ECGD will share reports and assessments with other ECAs although each ECA must make its own decision based on its own criteria of acceptability.</p>
27	United States	<p>The undertaking of a required EIA is generally the responsibility of the project sponsor (or foreign buyer) though Ex-Im Bank will accept an EIA undertaken by the exporter. Ex-Im Bank's Environmental Practitioner is responsible for the review of the EIAs undertaken in conjunction with projects financed by Ex-Im Bank. In the case of projects that have exceptionally sensitive or complex environmental issues, Ex-Im Bank may require that the sponsor engage an independent environmental consultant to assist Ex-Im Bank (and other lenders) in its review of the EIA.</p>

	Countries	4. Environmental Review: standards applied
		b) Please provide details on the standards used for benchmarking purposes. Please indicate in what circumstances Members apply Regional Development banks standards (e.g. IADB, ADB, AfDB).
1	Australia	Category A transactions are benchmarked against IFC Safeguard Policies and the relevant guidelines in the World Bank's Pollution Prevention and Abatement Handbook. In-country standards may be applied to other categories.
2	Austria	We mainly use World Bank, EU, Austrian and buyer country standards. We use the standards as supplied in the EIA or environmental questionnaires and compare the given figures to one or more of the other standards for benchmarking purposes. Regional Development Bank Standards have not been used so far. In case of EIAs using these standards they could be used for benchmarking.
3	Belgium	We use local and international standards (i.e. WB, IFC ...). So far, we have no experience related to Regional Development banks.
4	Canada	EDC conforms to the Recommendation in its use of standards for benchmarking purposes which includes the ability to reference Regional Development bank (RDB) standards as benchmarks. EDC would consider RDB standards as appropriate when the respective RDB is involved in the project.
5	Czech Republic	World Bank, EU standards. Local standards if stricter.
6	Denmark	Typically, EKF uses World Bank / IFC / EU standards. As a signatory to the Equator Principles, EKF uses World Bank / IFC standards for project finance.
7	Finland	Finnvera uses environmental guidelines published by the IFC and World Bank and safeguard policies of the World Bank Group in benchmarking purposes. So far Finnvera doesn't have any benchmarking experience on Regional Development Bank's standards.
8	France	All projects have to meet or exceed the applicable host country standards and World Bank Group Guidelines (PPAH and IFC Guidelines) and Safeguard Policies. On a case by case basis, the World Bank Group Guidelines and Safeguard Policies may be completed by European standards, industries best practices, WHO, IAEA, and ICRP guidelines, or relevant international Conventions, as appropriate. Coface's environmental sectoral guidelines aim at clarifying which standards are relevant and how they are to be applied for 3 sensitive sectors (thermal power plants, oil and gas, and hydropower and large dams). We never met the case where we would apply Regional Development Banks standards exclusively.
9	Germany	Applied standards for benchmarking purposes are World Bank Standards including the Safeguard Policies referred to in the Recommendation. In some cases EU-Standards were applied. Regional Development Bank Standards could be applied when those institutions are involved in the project, but up to now, we do not have any experience with Regional Development Bank Standards.
10	Greece	We use local and international standards.
11	Hungary	WB, EBRD, EU, or Regional Development Banks as appropriate. In minor sub-supplier cases Hungarian standards may be applied (only if they are in compliance with the EU ones). Compliance with host country standards is a minimum requirement.

	Countries	<p style="text-align: center;">4. Environmental Review: standards applied</p> <p>b) Please provide details on the standards used for benchmarking purposes. Please indicate in what circumstances Members apply Regional Development banks standards (e.g. IADB, ADB, AfDB).</p>
12	Italy	<p>The standards mainly used are from: World Bank Group, WHO, IAEA, UE and Host Country.</p> <p>Regional Development Banks standards have been used in addition to those previously mentioned in co-financing situations with those Regional Banks, on projects located in their area of activity.</p>
13	Japan	<p>JBIC ascertains whether a project complies with environmental laws and standards of the host national and local governments concerned, as well as whether it conforms to their environmental policies and plans. JBIC also uses, as benchmarks, examples of standards and/or good practices regarding environmental and social considerations established by international and regional organizations and developed countries such as Japan. Whether JBIC use RDBs standards for benchmarking purposes depends on each case.</p> <p>NEXI ascertain whether a project complies with environmental laws and standards of the host country, as well as whether it conforms to their environmental policies. NEXI also use, as reference points or benchmarks, examples of international standards such as World Bank standards.</p>
14	Korea	<p>KEIC uses host country standards as well as internationally recognised standards such as the World Bank Group for benchmarking purposes. Regional Development Banks standards may be applicable when they are involved in the project</p> <p>KEXIM: uses host country standards and international standards such as the World Bank Group, EBRD etc. When EIAs use Regional Development Bank Standards, they could be accepted as long as the benchmarks of RDBs are more or as stringent as those of the host country.</p>
15	Luxembourg	<p>We use local and international standards (<i>i.e.</i> WB, IFC ...). So far, we have no experience related to Regional Development banks.</p>
16	Netherlands	<p>The project has to meet at least the environmental standards of the host country. These will be benchmarked against international standards, like those from the World Bank Group, IFIs, EU etc. In general, World Bank Group standards or guidelines will be leading. When they do not suffice other more applicable standards will be adhered to, like WHO, BAT, BREF etc.</p>
17	New Zealand	<p>Typically, the ECO will use World Bank / IFC standards.</p>
18	Norway	<p>Normally GIEK would seek the highest international standards (for Category A/B); we can deviate from these in specific cases based on the circumstances.</p>
19	Poland	<p>Polish guidelines imply that emissions are benchmarked against host country standards and any of international recognized standards (World Bank, MDBs, etc.), if more stringent within benchmarking process. Regional Development Banks standards may be applicable when regional financial institutions are involved in a project financing. Case-by-case approach.</p>
20	Portugal	<p>Applied standards for benchmarking purposes are the importer's country standards, the WBG standards (including the safeguard policies referred in the Recommendation) and the Regional Development Banks standards. The WBG and MDBs standards will be applied in case of being more restrictive than those of the host country.</p>

Countries		4. Environmental Review: standards applied
		b) Please provide details on the standards used for benchmarking purposes. Please indicate in what circumstances Members apply Regional Development banks standards (e.g. IADB, ADB, AfDB).
21	Slovak Republic	Applied standards are World Bank Standards, or standards of the other international financing institutions or EU-Standards and the host country standards if they are available.
22	Spain	We benchmark all projects against World Bank standards in the initial screening. When a more thorough review is deemed necessary, we would apply other standards (<i>i.e.</i> EU, Regional Development Banks...) upon request from the applicant.
23	Sweden	EKN uses World Bank (PPAH), IFC, EBRD and EU (BAT documents) standards. The project has to meet the relevant international standards, if these are more stringent than host country standards.
24	Switzerland	The most commonly used are WB standards (PPAH and Safeguard Policies). However IFC, EBRD and EU standards are of course also acceptable but rarely seen. Regional development bank standards would only be used if a regional bank is actively involved in a project.
25	Turkey	TE benchmarks projects against both international and host country standards. Along with the World Bank and EBRD standards, the standards of other regional development banks may also be used depending on the location of the host country.
26	United Kingdom	ECGD normally uses the relevant World Bank Group (mainly IFC's) Guidelines and Safeguard Policies as its criteria for acceptability. Other criteria may include other international standards (WHO, Regional Development Banks), UK/EU and local standards and industry best practice. Projects must meet or exceed the more stringent of host country standards, World Bank Group guidelines or other relevant international guidelines. ECGD will consider the possible use of the new IFC Performance Standards after they are published in early 2006. ECGD would consider the use of the relevant Regional Development Bank's standards rather than those of the World Bank Group if a project sponsor requested this and could justify it as more appropriate.
27	United States	The international guidelines cited as generally applicable to projects financed by Ex-Im Bank are those of the World Bank, including the PPAH and those World Bank Operational Policies listed within its Procedures and Guidelines that were in effect as of December 18, 2003. For those projects in which another MDB such as the EBRD, the AfDB, the ADB or the IaDB is involved, Ex-Im Bank may apply the guidelines of the respective MDB. However, if Ex-Im Bank determines that those MDB guidelines are insufficient to adequately address the project's environmental effects, applicable elements of the World Bank guidelines are used to supplement the (deficient or lacking) MDB guidelines. For Nuclear projects, applicable World Bank guidelines are supplemented by International Atomic Agency (IAEA) recommendations and guidelines.

	Countries	4. Environmental Review: site visits c) Please specify in which cases it is requested that site visits be carried out.
1	Australia	Where practical a site visit by (at least) EFIC's Technical and Environmental staff will take place for a proposed Category A transaction as part of the EFIC review process. Compliance monitoring site visits are also undertaken where appropriate.
2	Austria	Usually site visits are carried out for Category A projects on a case by case basis. The decision whether or not a site visit is carried out is made based on the quality and findings of the EIA and accompanying environmental information. For Category B projects site visits are carried out when also justified from buyers risk assessment point of view. So far experience is favourable for site visits.
3	Belgium	Site visits can be envisaged on a case by case basis, depending on the nature of the project and the quality of the information concerning the project. No experience so far.
4	Canada	Site visits are undertaken by EDC on a case-by-case basis. Site visits are primarily carried out on Category A projects.
5	Czech Republic	Only in cases EGAP receives an indication of breach of environmental guidelines during the monitoring process. No practice yet.
6	Denmark	For Category A projects, EKF and our environmental consultant will normally carry out a site visit.
7	Finland	Normally site visits are not conducted.
8	France	Site visits may be considered necessary, on a case by case basis, particularly for Category A projects involving complex, sensitive or site-specific issues.
9	Germany	The request for site visits depends on the need for further information which cannot be obtained otherwise.
10	Greece	If necessary a site visit could take place.
11	Hungary	Site visit may be conducted only in exceptional cases, either before decision (<i>e.g.</i> for gathering information on sensitive cases; for the sake of cooperation) or after decision (<i>e.g.</i> for monitoring reason).
12	Italy	Site visits are often carried out for Category A projects. Normally no site visits are foreseen for Category B or C projects. The need and timing for the visits is decided case by case: it is often useful during the review, but it can be deemed useful also during monitoring of critical construction/operational phases.
13	Japan	JBIC: Whilst not being obligatory under the JBIC Guidelines, a site visit is very likely for Category A projects as a substantial process of environmental assessment. For Category B projects, site visits will be made less frequently than for Category A projects; decisions are made on case-by-case study. NEXI usually conduct site visits for Category A projects.
14	Korea	KEIC: On a case by case basis, site visits are requested when the project classified as Category A has such a considerable negative environmental impact that additional information is required beyond EIA. KEXIM: On case-by-case basis. Site visits are requested when further information beyond EIA is needed.
15	Luxembourg	If necessary, a site visit could take place. No experience made so far.
16	Netherlands	Under our environmental assessment procedures the possibility of undertaking site visits is decided on a case by case basis for Category A projects. For Category B and C projects site visits are not envisaged.

	Countries	4. Environmental Review: site visits
		c) Please specify in which cases it is requested that site visits be carried out.
17	New Zealand	For Category A projects, it is anticipated that ECO and the environmental consultant will usually carry out a site visit. This is a case-by-case decision.
18	Norway	On a case-by-case basis. Site visits will be requested for all Category A cases, visits are normally carried out by the consultant preparing the EIA.
19	Poland	Site visits comply with a case-by-case evaluation concept by environmental expert.
20	Portugal	In principle, we are not considering to make local site visits.
21	Slovak Republic	Usually no site visits are conducted.
22	Spain	We understand site-visits may be necessary in very sensitive projects.
23	Sweden	EKN carries out site visits when needed.
24	Switzerland	So far only carried out in cases of resettlement. However, in general site visits can be carried out as needed.
25	Turkey	At any time during the lifetime of the project – both usual and as-required basis- site visits by our own experts or those of a consulting firm can be carried out.
26	United Kingdom	ECGD normally requires site visits for Category A projects.
27	United States	Environmental site visits are conducted in the course of the environmental review as required for the Environmental Practitioner to adequately review the environmental effects of the project. Decisions as to which cases warrant a site visit are made on a case-by-case basis by the Environmental Practitioner, and such visits generally occur only for those Category A projects which have complex or unusual environmental characteristics or issues.

5- DECISION ON OFFICIAL SUPPORT AND COMPLIANCE MEASURES

Countries	5. Decision: conditions to official support
	a) How are conditions related to environment incorporated into the loan agreement prior to or after the decision on official support, e.g. do you use environmental covenants in your loans and/or guarantee contracts? Please provide details.
1	Australia Following initial screening of the transaction, any indication of “in-principle” support <u>prior</u> to the decision regarding official support for Category A and Category B transactions is conditional on the exporter/sponsor providing sufficient information for EFIC to assess, and find satisfactory, the environmental and social impact of the transaction. Conditionality <u>after</u> the decision on official support is usually limited to Category A and Category B transactions and is dependant on EFIC’s assessment of the impact of the transaction. Covenants, conditions precedent or special conditions may be applied to ensure compliance with, for example, specific nominated mitigants, sponsor undertakings or nominated environmental standards. Those covenants etc form part of the facility documentation and are legally binding.
2	Austria OeKB has no direct role in the drafting of the loan agreement as such. The results of the environmental assessment are incorporated in the conditions for cover. Only such conditions are imposed which the exporter can fulfil. Other conditions which can only be met by the buyer or buyer country’s authorities are sought to be fulfilled in advance. If this is not possible, the buyer country’s authorities have to commit to the fulfilment in writing before a decision on official support is made; this can also be made a precondition for cover coming into force.
3	Belgium The environmental conditions of official support (guarantee) can be enclosed in the particular conditions of our guarantee. There is no special covenant.
4	Canada Covenants or conditions are used to ensure compliance with host country and international standards and to allow monitoring through, for example, submission of monitoring reports. The need for environmental covenants is determined by EDC’s Environmental Advisory Services team as part of the environmental review process. Environmental covenants are normally negotiated prior to the decision to provide support.
5	Czech Republic For the environmental review of Category A and B, EIAs are required together with an unequivocal evaluation by an external consultant of acceptability of the environmental impact of the export in the host country.
6	Denmark When appropriate, EKF uses environmental covenants.
7	Finland Finnvera provides export credit guarantees, not loans. Necessity of conditions related to environment is assessed in the environmental review. If such conditions are needed, they can be incorporated mainly in the loan or guarantee contract.

	Countries	<p style="text-align: center;">5. Decision: conditions to official support</p> <p>a) How are conditions related to environment incorporated into the loan agreement prior to or after the decision on official support, e.g. do you use environmental covenants in your loans and/or guarantee contracts? Please provide details.</p>
8	France	<p>Where necessary, Coface introduces environmental conditions in its offer of cover (e.g. additional information, commitments to comply with standards and the Environmental Management Plan, or to implement specific mitigation measures). These conditions have to be met to the extent possible before issuing the insurance policy. Conditions precedent must be satisfied before Coface's cover comes into force. For the most sensitive projects, on a case by case basis, Coface may also require some of these conditions to be included in the loan agreement. In such cases, Coface also usually includes some environmental conditions in its guarantee agreement regarding transmission of monitoring reports.</p>
9	Germany	<p>Since Euler Hermes only provides pure cover, there is a limitation to the use of environmental covenants in the guarantee contract as compared to direct lending. However, environmental covenants are used where appropriate, e.g. in project finance cases.</p>
10	Greece	<p>ECIO provides only pure cover. Therefore, our special conditions of cover may prescribe our environmental conditions.</p>
11	Hungary	<p>General Business Conditions being legally binding part of the loan/guarantee contract refer to the provisions of environmental conditions set forth in the relevant national regulation.</p>
12	Italy	<p>For large Category A projects environmental covenants can be foreseen; these are often incorporated into the loan agreement covered by the policy as commitments of the project sponsors and warranties. In less frequent cases, a few covenants have been included in SACE policy. Environmental covenants are more easily incorporated into the loan documents than into the policy (which is direct to the applicant and not to the project sponsor), and more easily for structured finance transactions than for export credits. In some cases, formal commitments in writing have been sought by the project sponsor/borrower when it was not possible to incorporate it into the financial documents.</p>

	Countries	<p align="center">5. Decision: conditions to official support</p> <p>a) How are conditions related to environment incorporated into the loan agreement prior to or after the decision on official support, e.g. do you use environmental covenants in your loans and/or guarantee contracts? Please provide details.</p>
13	Japan	<p>JBIC uses environmental covenants in the loan agreement. If JBIC judges that appropriate environmental and social considerations are not ensured at the time when it makes decisions on its loan commitment, such commitment will not be made. However, if JBIC judges that appropriate environmental and social considerations are not ensured at the time of loan commitment but will be expected by the time of loan disbursement, there might be a case for JBIC to make a loan commitment with appropriate conditions for the disbursement of the loan. In such a case, in principle, JBIC will not make the loan disbursement unless the specified conditions precedent is satisfied. When there is a non-compliance with the environmental covenants in the loan agreement after the disbursement of the loan, JBIC may suspend the disbursement or accelerate the loan unless that situation is cured.</p> <p>NEXI: To assure the implementation of environmental and social considerations by the insurance applicants or the project sponsors, additional requirements on environmental and social considerations (Environmental Special Clauses) are included in NEXI's insurance policies. And to secure the effect of the Clauses, in principle environmental covenants (e.g. submission of monitoring reports) will be incorporated into the loan agreement prior to the decision on official support.</p>
14	Korea	<p>KEIC attaches to the insurance policy supplementary requirements on environment agreed upon by the applicants/sponsors in order to make sure the implementation of the environmental conditions. If necessary, environmental covenants could be incorporated into the loan agreement in co-ordination with the lending financial institution(s) prior to the decision on official support.</p> <p>KEXIM: In the clause of representations and warranties in the loan agreement, sponsor/borrower acknowledges that it has duly complied with all applicable environmental laws and it has received no written compliant or claim with respect to any environmental claim as of the date on which the loan agreement becomes effective.</p> <p>In accordance with environmental covenants in the loan agreement, on the request of KEXIM, sponsor/borrower is required to provide KEXIM with all the documents and information necessary to carry out screening and review in prior to the decision on official support. KEXIM may receive an environmental impact assessment report in respect of the project as conditions precedent documents. After the decision, during the operation stage of the project, sponsor/borrower may provide the environmental report necessary to monitor and ensure compliance with the conditions of official support. In the case of non-compliance with all the conditions above, KEXIM can decline official support, if support is to be provided, take such actions to restore compliance in accordance with the clause of event of default.</p>
15	Luxembourg	<p>In case of environmentally sensitive projects, a special annex is enclosed to the guarantee contract. No environmental covenant.</p>

	Countries	<p align="center">5. Decision: conditions to official support</p> <p>a) How are conditions related to environment incorporated into the loan agreement prior to or after the decision on official support, e.g. do you use environmental covenants in your loans and/or guarantee contracts? Please provide details.</p>
16	Netherlands	<p>A condition that may be included in a promise of cover of Atradius for export credits is the requirement that under our environmental assessment procedure no substantial negative environmental impact has been established. This is the case when before the issue of a promise of cover we have not yet been able to establish this. For normal transactions (including all credit insurance, manufacturing insurance and investment insurance for account of the Dutch State including short term transactions) under our decision to provide cover for the project, there are no special environmental conditions attached. If after issuing of the policy it turns out that the exporter has provided environmental information for the review of the project which he could know was incorrect or incomplete then we can deny indemnity. For Project Finance transactions environmental conditions are often incorporated in the loan agreement as commitments of the project sponsor and warranties to the banks. These bank(s) and/or exporter(s) are covered under a policy of Atradius.</p>
17	New Zealand	<p>When appropriate, the ECO is likely to use environmental covenants in the guarantee contracts. This is a case-by-case decision and will be supported by recommendations by the external environmental consultant.</p>
18	Norway	<p>Conditions are applied on a case by case basis. Offers can be given with special conditions which have to be met when the policy is issued. GIEK also have special conditions in the policy which will represent default on the borrower if they are not met in the down-payment period.</p>
19	Poland	<p>Special conditions with respect to environmental issues may be a part of an agreement prior as well as after decision. Prior decision covenants may for instance oblige to submit specific permissions or opinions. Post decision conditions may force to apply mitigation measures or make the Environmental Audit.</p>
20	Portugal	<p>All projects should comply with our environmental criteria used for providing cover. Effects beyond these criteria are excluded from cover. In case of mitigation requirements, we will take the adequate measures that ensure compliance with the conditions established in the contract for which cover was provided.</p>
21	Slovak Republic	<p>Environmental evaluation is made prior to any cover decision. Conditional approval (insurance undertaking) is possible.</p>
22	Spain	<p>We distinguish between conditionality <u>prior</u> and <u>after</u> official support.</p> <p><i>Prior:</i> We may introduce conditions in our offers of cover, i.e. prior to the issuance of a policy, regarding e.g. the submission of specific information (e.g. EIA) with acceptable conclusions; this may include changing the contract and/or the loan agreement.</p> <p><i>After:</i> In the insurance policy itself we may also include some covenants.</p>
23	Sweden	<p>EKN's policy is not to use environmental covenants. In co-financing cases EKN, however, may co-ordinate its guarantee conditions with co-financiers. Also, if a financing bank has inserted covenants in the loan contract, EKN would do likewise. In its offer, EKN often stipulates environmental <i>pre-conditions</i> for the issue of guarantee.</p>

	Countries	5. Decision: conditions to official support a) How are conditions related to environment incorporated into the loan agreement prior to or after the decision on official support, e.g. do you use environmental covenants in your loans and/or guarantee contracts? Please provide details.
24	Switzerland	If needed ERG uses covenants in its guarantees (provider of pure cover only) and makes sure, that the bank(s) reflect these in their loan agreement. However, this method is only rarely used. More often ERG puts environmental conditions in the promise of guarantee.
25	Turkey	Special conditions are inserted in the loan agreements (both as an article under the heading “undertaking” or as a CP when necessary) and Operational Manuals.
26	United Kingdom	Where necessary, ECGD introduces environmental covenants and conditions (e.g. compliance with agreed standards, production and implementation of environmental and social management plans). Conditions precedent must be satisfied before ECGD’s cover becomes effective. Covenants relate to ongoing obligations of the project.
27	United States	Following recommendations made by Ex-Im Bank’s Environmental Practitioners (and approved by the Bank’s Board of Directors, environmental covenants are incorporated into Ex-Im Bank loan or guarantee agreements as needed to ensure that a project is constructed and operated according to the applicable guidelines. Examples of such conditions may be that a sponsor complete or revise an environmental management plan, or show evidence that a proposed environmental mitigation measure is actually implemented. In practice, the majority (if not, all) of Ex-Im Bank guarantee and loan agreements for Category A projects contain one or more environmental conditions.

	Countries	5. Decision: consideration to deny official support
		b) Under what circumstances would you consider denying support in relation to the expected environmental performance of the project? Please provide details.
1	Australia	Transactions that do not comply with the requirements of EFIC's Environment Policy may be declined.
2	Austria	With respect to environmental considerations denial of official support will be considered if based on the information available and after carefully balancing the pros and cons there is sufficient evidence that the project has considerable negative impact which is not expected to be properly mitigated.
3	Belgium	Our decision to deny official support is based on the examination of the answers to the application form. For instance, we would deny official support if the answers to the questionnaire are not satisfactory, for non respect of the standards requested, high degree of pollution, no measures undertaken to reduce the negative environmental impact, possibility of alternative of the project.
4	Canada	Unless at least one of the following criteria is met, EDC will deny support: <ul style="list-style-type: none"> • the adverse environmental effects, taking into account mitigation measures, associated with the project are not in EDC's view significant; • EDC's is satisfied that the project is designed to meet or exceed internationally recognized good practices, guidelines or standards; • the project represents an opportunity to improve environmental conditions in the host country above base-line conditions; or • the project provides the opportunity to transfer environmentally sound technologies, services and knowledge to, or for the benefit of, the host country.
5	Czech Republic	In case EIA proves a negative impact of the export project on the environment.
6	Denmark	EKF would deny support to projects, which our external environmental consultant cannot recommend based on the OECD Recommendation, and for project finance the Equator Principles as well, international standards, and EKF's guidelines.
7	Finland	If the project would not meet essential requirements of Finnvera's environmental policy, support is denied.
8	France	In case a project would not meet our Environmental Guidelines and it's not possible or realistic to impose additional environmental conditions.
9	Germany	Official support is provided if the project is eligible for support and the risks involved are justifiable. If the overall environmental review process leads to the result that these criteria are not met, official support will be denied.
10	Greece	Cover is not approved when after all the necessary measures taken by the exporter there is a significant adverse environmental impact.
11	Hungary	Support has to be denied if the project review shows severe negative environmental impact and/or if the restoration, mitigation or compensation measures fail to balance the adverse environmental impact of a project.
12	Italy	The environmental review report describes if and how the compliance with international standards and guidelines is ensured and the measures taken to control the environmental impacts are implemented. The decision of guarantee is taken by the Board of Directors on the basis of the transaction overall review results taking into consideration pros and cons.

	Countries	5. Decision: consideration to deny official support b) Under what circumstances would you consider denying support in relation to the expected environmental performance of the project? Please provide details.
13	Japan	JBIC: It depends on each case. NEXI: If the project is not recognized to be conducive to the development of Japan's external transactions, and / or economic or social development of the host country, NEXI may deny support.
14	Korea	KEIC: When the project has a considerable negative impact and is expected not to be properly mitigated. KEXIM: When there is sufficient evidence that the project has considerable negative impact which is expected not to be properly mitigated.
15	Luxembourg	Our decision to deny official support is based on the examination by the external consultant of ODL of the answers to the application form.
16	Netherlands	See previous question.
17	New Zealand	It is likely that the ECO will deny support to projects, which our external environmental consultant cannot recommend based on the OECD Recommendation, international standards, and ECO's guidelines.
18	Norway	We will not support a project that does not comply with our environmental requirements.
19	Poland	Denying support may take place in case that an applicant refuses to cooperate with KUKA S.A. and environmental expert as well as refuses to take any mitigation measures. Decision is to be taken by the Inter-ministerial Committee.
20	Portugal	In case of adverse effects that can not be mitigated or in case of projects that are not in accordance with the adequate standards.
21	Slovak Republic	In case that a project does not comply with environmental requirements, EXIMBANKA SR will require an adjustment of the technical parameters in order to fulfill the requirements. In case that submitted EIA does not answer to the environmental requirements or does not contain unambiguous assessment, than EXIMBANKA SR can ask the exporter to supplement an assessment with other information, to complete or to submit a new EIA .
22	Spain	In case a project does not meet our Environmental Policy.
23	Sweden	EKN turns down applications for guarantees 1) if the necessary information on and analysis of environmental consequences are not received, 2) if the review has revealed strong negative environmental impact or 3) if environmental consequences have an effect on the risk in the transaction to the extent that it becomes unacceptable.
24	Switzerland	<ol style="list-style-type: none"> 1. If it is clear that a necessary step, e.g. an EIA for a Category A project leading to resettlement, has not even been contemplated (has happened in practice, in addition it was a government project and the buyer country had a very bad reputation with relation to human rights). 2. If the required environmental information has not been submitted 3. If a review reveals an excessive negative environmental impact that cannot be mitigated satisfactorily
25	Turkey	TE will not support a project that does not comply with her environmental requirements.

	Countries	5. Decision: consideration to deny official support b) Under what circumstances would you consider denying support in relation to the expected environmental performance of the project? Please provide details.
26	United Kingdom	If the expected environmental performance of the project did not meet the relevant international standards, ECGD would normally engage with the exporter and project sponsor to raise the project standards. If this were not successful, ECGD would normally deny support.
27	United States	Ex-Im Bank's practice has been to officially decline financial support for projects that are determined to have major adverse environmental aspects that cannot (or will not) be the subject of mitigation measures sufficient to bring the project into general compliance with the Bank's Environmental Procedures and Guidelines. For these transactions, the Environmental Practitioner must determine that there exists little or no likelihood that adequate environmental mitigation measures will be undertaken by the project sponsor(s), irrespective of any environmental conditions which Ex-Im Bank could otherwise impose.

	Countries	5. Monitoring and compliance : implementation of projects c) What monitoring/compliance mechanisms do you apply throughout the implementation of the project, after decision of official support? (please provide details, such as monitoring frequency/period, content, reporting method)
1	Australia	Monitoring mechanisms after the decision to support depend on EFIC's assessment of the transaction's impact, whether there is a suitable contractual relationship with the sponsor or exporter to enable such monitoring, and any environmental and/or social conditions or covenants that have been applied to the transaction. Compliance monitoring may be undertaken through (usually annual) independent impact reviews or compliance audits by external parties. In-house compliance monitoring may also be applied to the transaction, especially during the construction phase.
2	Austria	OeKB seeks to ensure that equipments, procedures and mechanisms are or will be in place to comply with the environmental standards applied during the assessment. Post-completion, OeKB normally relies on the sponsor or third parties (<i>e.g.</i> guarantee holding banks) to be responsible for proper environmental monitoring.
3	Belgium	No experience so far. We will control if all conditions of the coverage are fulfilled.
4	Canada	Monitoring/compliance mechanisms are dependent on the covenants/conditions that have been incorporated into the agreement. See 5 a) above. These mechanisms may include submission of environmental monitoring reports, environmental management plans, resettlement action plans, etc. Frequency will be determined case by case and may vary for pre- and post-commissioning phases.
5	Czech Republic	The exporter is responsible for keeping the parameters of the project during construction. In case original parameters are not complied with, EGAP will not pay indemnification or will take recourse against the exporter in case of buyer's credits. The exporter is obligated to send regularly monitoring reports to EGAP. No experience.
6	Denmark	Monitoring mechanisms (including frequency, content and reporting method) are determined based on the environmental recommendation prepared by EKF's external consultant.
7	Finland	Monitoring during operating phase will be restricted to chosen Category A projects. Preferably, an independent external party carries out actual work needed to compile the monitoring reports.

	Countries	<p align="center">5. Monitoring and compliance : implementation of projects</p> <p>c) What monitoring/compliance mechanisms do you apply throughout the implementation of the project, after decision of official support? (please provide details, such as monitoring frequency/period, content, reporting method)</p>
8	France	<p>Monitoring mechanisms are usually introduced in case some specific environmental conditions have been included in the EPC Contract, loan agreement or guarantee agreement, in order to verify and to ensure the project compliance with these conditions. In case of non compliance remedies such as suspension of disbursement or repayment acceleration are generally available.</p> <p>An independent third-party reporting on the basis of regular on-site verifications is usually considered to be the best option. On a case by case basis, Coface may also be satisfied with direct reporting by the Contractor or the Sponsor. Typical monitoring frequency is quarterly reporting during construction phase and yearly reporting during the operational phase (but it may vary according to the schedule of activities to be monitored – e.g. resettlement activities may require a specific reporting schedule). Content of reporting is usually based on the environmental conditions introduced in the contractual documentation (compliance with agreed standards and/or the Environmental Management Plan, implementation of specific activities or mitigation measures...).</p>
9	Germany	<p>In the cases where monitoring/compliance mechanisms are applied (mainly project finance), the policy holder has to report possible deviations from the initial project design every six months until commissioning. After commissioning a yearly report has to be submitted, also covering environmental issues.</p>
10	Greece	<p>No experience.</p>
11	Hungary	<p>If project monitoring has been stipulated as a pre-condition for the cover, the applicant is obliged to submit monitoring reports on the environmental impacts of the project at regular intervals.</p>
12	Italy	<p>When environmental covenants are required, periodic monitoring is foreseen. Monitoring frequency is normally 6-monthly during construction and annually during operation. Monitoring content includes environmental emissions, ESMP implementation, project specific requirements. Reporting by a third party is normally required in structured finance transactions.</p>
13	Japan	<p>JBIC: For Category A/B projects, in principle, JBIC confirms through the borrower over a certain period of time, the results of monitoring by the project proponents of any items which have a significant environmental impacts. Monitoring frequency/period depends on each case.</p> <p>NEXI: For Category A and B projects, in order to confirm the sponsors' appropriate implementation of environmental and social considerations, NEXI confirms through the insurance applicant the results of monitoring. The items or the period for monitoring will be decided by taking into account the nature and characteristics of the project. Generally, air and water quality etc, items related to natural environment and social aspects, where appropriate, will be required for monitoring.</p>

	Countries	<p align="center">5. Monitoring and compliance : implementation of projects</p> <p>c) What monitoring/compliance mechanisms do you apply throughout the implementation of the project, after decision of official support? (please provide details, such as monitoring frequency/period, content, reporting method)</p>
14	Korea	<p>KEIC: The project applicant and/or sponsor for Category A projects is required to provide an environmental implementation report to KEIC not less than on a yearly base. When necessary, the relevant staff may visit the project site on an <i>ad hoc</i> basis.</p> <p>KEXIM: for Category A projects, project sponsors and/or borrowers are required to provide an environmental implementation report to KEXIM. Monitoring frequency / period depends on case-by-case. When necessary, the relevant staff may visit the project site on an ad hoc basis.</p>
15	Luxembourg	We have no experience so far, but we will control if all conditions for coverage are respected.
16	Netherlands	Depending on the size and category of the transaction, Atradius asks the exporter information about the monitoring of the environmental performance, what procedures there will be/are in place to get a proper feedback and follow up. Generally information about monitoring will be asked or gathered for Category A projects/transactions and to a lesser extent for Category B projects/transactions through the ESMP included in the EIA or EIS respectively before final commitment. For Project Finance transactions the monitoring is audited and reported to the banks/ECA's by an independent environmental consultant. For these transactions in general the auditing frequency during the construction phase will be twice a year and during the production phase once a year. The content should be in compliance with WB/IFC standards and reporting method as agreed under and in line with the ESMP.
17	New Zealand	It is anticipated that monitoring mechanisms (including frequency, content and reporting method) will be determined taking into consideration the recommendations of the ECO's external environmental consultant.
18	Norway	Case-by-case. In the case of <i>e.g.</i> resettlement monitoring will be required. The specific details will be agreed upon with the consultant and the buying company/country.
19	Poland	Monitoring obligations included into insurance policy, when needed. Cover is excluded in case the monitoring duties are not fulfilled – new descriptions have been introduced into the detailed conditions of cover.
20	Portugal	Taking into account the characteristics of the projects and the EIA mitigation measures, or any deviations from the initial project design, we will implement contractual provisions.
21	Slovak Republic	<p>Category A - monitoring during the whole period of realisation of the project. A part of a taking-over of the project to the foreign buyer will be a final protocol, containing an assessment of really reached parameters.</p> <p>Category B – monitoring case-by-case.</p>
22	Spain	We foresee the introduction of mechanisms, during the construction period, such as periodic (<i>e.g.</i> every six months) reporting by an independent party in very sensitive projects whereby environment covenants have been included.

	Countries	5. Monitoring and compliance : implementation of projects c) What monitoring/compliance mechanisms do you apply throughout the implementation of the project, after decision of official support? (please provide details, such as monitoring frequency/period, content, reporting method)
23	Sweden	In EKN, in some cases, when monitoring of the whole project is being carried out, environmental monitoring is a part of the overall project monitoring process. In specific cases, separate environmental monitoring can be called upon for projects. In those cases environmental monitoring can, but not necessarily, be a stand-alone process. The third case when environmental monitoring takes place is when environmental covenants occasionally are used in EKN guarantees.
24	Switzerland	Summary to be submitted by guarantee holder (exporter) every half year, detailing project progress and any problems with implementing environmental covenants during the construction period. ERG has only recently started to require such reports in the case of Category A projects with environmental covenants. While Switzerland has considered environmental monitoring as an option post completion, no case has closed so far where such a monitoring mechanism was defined.
25	Turkey	TE may at any time seek advice from an independent consulting firm regarding the subject. During the usual site visits for normal project follow-up, our experts or those of an independent consulting firm are supposed to check whether any environmental aspect of the project is going on as planned and mitigatory measures have been properly taken if so decided. Hence, the follow-up report should also include a section on environment.
26	United Kingdom	Monitoring mechanisms are normally introduced for major projects. This typically involves quarterly/semi-annual auditing and reporting during construction and annual auditing and reporting during the operational phase, preferably by an independent party.
27	United States	Ex-Im Bank's Environmental Procedures and Guidelines state that all Category A projects will be monitored for their environmental performance through the term of Ex-Im Bank's financial support, particularly those aspects of projects subject to environmental conditions contained within the financing agreement. The mechanisms employed by Ex-Im Bank to monitor the project's performance include site visits by the Environmental Practitioner and the review of reports required of the Sponsor relating to the environmental performance of the project. Ex-Im Bank site visits to monitor environmental performance are conducted when deemed necessary by the Environmental Practitioner, generally on the basis of information received within environmental reports provided by the sponsor. In practice the frequency of reports required by Ex-Im Bank related to a project's environmental performance is monthly during construction and semi-annually following project completion. Ex-Im Bank requires more frequent reporting for projects having sensitive environmental issues.

	Countries	5. Monitoring and compliance: accountability of your guideline d) Do you have any mechanism to review and enforce the implementation of your environmental guidelines that are accountable to all your stakeholders, e.g. has an independent Unit/Ombudsman/Officer been established for this purpose? If so, please provide details.
1	Australia	EFIC compliance with its Environment Policy has been reviewed by its internal auditor, currently PricewaterhouseCoopers. The most recent audit results are available on EFIC's Web site at http://www.efic.gov.au/attachments/db/efi/69.pdf
2	Austria	Compliance with own environmental guidelines is ensured as OeKB is certified according to EMAS (environmental management and audit scheme) and ISO 14001. Internal and external audits are carried out annually and an extensive external audit takes place every three years. The results are published as part of the "Sustainability Report" of OeKB.
3	Belgium	No.
4	Canada	<p>EDC has a Compliance Officer to enhance EDC's transparency and accountability practices in areas such as public disclosure of information, environmental reviews and business ethics. The Compliance Officer plays an "ombudsman-like" role, acting as an intermediary between EDC and any external complainants who want to assure themselves that EDC is compliant with its CSR policies. The Compliance Officer also provides advice on ethical business practices and may suggest, oversee and monitor external or internal audits.</p> <p>EDC also reports annually on the implementation of EDC's environmental practices through the public release of the Chief Environmental Advisor's Report.</p> <p>In addition, EDC is subject to regular audits by the Auditor General of Canada.</p>
5	Czech Republic	EGAP has the right of recourse against the Exporter in case the insurance loss has occurred by reason of non-observance of the limits specified in EIA.
6	Denmark	<p>The underwriter will follow up on the compliance of the environmental covenants on a regular basis. The need for and the mechanism of monitoring are determined based on the recommendations of the environmental review, performed by an external and environmental consultant, ensuring consistency and accountability.</p> <p>Furthermore, a comprehensive evaluation of the 11 large projects, to which EKF has provided support in 2002-2003, was performed by an external consultant. The result is published in the report "Financing of Sustainable Development 2002/2003". EKF will continue this evaluation of our portfolio on an annual basis in order to calculate and monitor the sustainability index. The results will be published.</p>
7	Finland	Implementation of Finnvera's environmental policy in actual transactions may be audited by Finnvera's internal auditor.
8	France	No formal mechanism. When stakeholders are unsatisfied with changes to our environmental guidelines or with their implementation, they generally make their point either to the environmental unit of Coface or to the Guardian Authority, depending on the type of comment. We try, as far as possible, to engage in a dialogue and provide clear and complete explanations.
9	Germany	The need for a review of our environmental guidelines is examined on a regular basis, taking into account the international development and the ongoing dialogue with stakeholders, e.g. exporters, NGOs, Members of the Parliament etc..
10	Greece	No.

	Countries	5. Monitoring and compliance: accountability of your guideline
		d) Do you have any mechanism to review and enforce the implementation of your environmental guidelines that are accountable to all your stakeholders, e.g. has an independent Unit/Ombudsman/Officer been established for this purpose? If so, please provide details.
11	Hungary	The implementation of our environmental guidelines is reviewed regularly. No incompliance officer.
12	Italy	Not specific mechanism is in place to this respect. An Internal Auditing Unit carries out reviews of SACE internal procedures and structures.
13	Japan	JBIC: Regarding measures to ensure JBIC's compliance with its own environmental guidelines, JBIC established the objection procedures, under which the Examiners for Environmental Guidelines handles objections with respect to JBIC's non-compliance with its guidelines. The Examiners were chosen from the public and they are independent from the operational department in order to maintain neutrality. For more details, please visit JBIC's Web site (http://www.jbic.go.jp/english/environ/). NEXI: In order to ensure compliance with the Guidelines, NEXI established the Objection Procedures on Environmental Guidelines in September 2003. If residents in the project country suffer (or may suffer) significant adverse impact of the project insured by NEXI, they can submit objections on NEXI's non-compliance of its Guidelines. When such objections are submitted, an Independent Environmental Examiner will investigate whether NEXI have complied with their Guidelines.
14	Korea	KEIC operates no independent unit for this purpose. KEXIM operates no independent unit.
15	Luxembourg	No
16	Netherlands	Within Atradius the implementation of the environmental guidelines are checked monthly by a control unit. Once a year the implementation is audited by a chartered accountant.
17	New Zealand	The underwriter will follow up on the compliance of the environmental covenants on a regular basis. An independent unit has not been established for this purpose.
18	Norway	No independent unit. However, our guidelines are of course accepted by the Ministry.
19	Poland	For reviewing compliance procedures and monitoring, KUKA S.A. has established environmental expert who is responsible for those purposes. Expert is also responsible for trainings on the revised environmental procedures. Environmental procedures have been approved by Inter-ministerial Committee.
20	Portugal	The review of the environmental guidelines takes into consideration the international agreements as they develop, although keeping a good dialogue with NGO's and other stakeholders.
21	Slovak Republic	No independent unit. However, our guidelines are of course accepted by the Bank Council of EXIMBANKA SR.
22	Spain	CESCE has an Environmental Management System certified according to ISO 14001. Within the framework of the System, the implementation of the Environmental Policy is audited every year, both by internal and external auditors. The system includes a procedure for the reception, and replay to relevant stakeholders communications.
23	Sweden	EKN regularly reviews its environmental guidelines.
24	Switzerland	No.

	Countries	5. Monitoring and compliance: accountability of your guideline d) Do you have any mechanism to review and enforce the implementation of your environmental guidelines that are accountable to all your stakeholders, e.g. has an independent Unit/Ombudsman/Officer been established for this purpose? If so, please provide details.
25	Turkey	There is no separate enforcement unit. Our Operational Manuals impose sanctions for non-compliance with environmental conditions similar to those of other areas of non-compliance.
26	United Kingdom	All decisions made by ECGD must have been made as a result of following ECGD's standard procedures. If these procedures are not followed, the decision may be challenged by Judicial Review.
27	United States	Ex-Im Bank has not established a position specifically dedicated to the review and enforcement of the implementation of its environmental guidelines. In lieu of an ombudsman or environmental auditing unit, Ex-Im Bank's Policy Division, which is organized separate from its Engineering and Environment Division, is tasked with monitoring Bank activities and actions to ensure they are consistent with established (and published) policies, such as the Environmental Procedures and Guidelines. In addition to Ex-Im Bank's Engineering and Environment Division, NGOs, and other stakeholders historically interface with this Policy Division when questions arise as to Ex-Im Bank's general application of its Environmental Procedures and Guidelines, or to the application of these Procedures and Guidelines relative to specific transactions.

6- EXCHANGE AND DISCLOSURE OF INFORMATION

	Countries	<p align="center">6. Legal provisions on disclosure of information</p> <p>a) What are the relevant legal bases for your disclosure policy? Do they preclude your responsible entity (ECA/sponsor/Ministry/..) from disclosure of environmental information; if so, please provide details on the following questions:</p> <ul style="list-style-type: none"> - do they preclude from disclosure prior to or after the decision on official support; - please specify the reason for non-disclosure (e.g. commercial-in-confidence); - if the reason for non-disclosure involves commercial-in-confidence, is your ECA legally precluded from requiring the client to provide the disclosure as a condition of receiving ECA support?
1	Australia	<p>The Export Finance and Insurance Corporation Act precludes EFIC from disclosing information relating to third parties (such as exporters and investors) except in certain circumstances. Therefore, to enable EFIC to comply with the Common Approaches requirement that environmental information be made publicly available at least 30 days before deciding on a final commitment, EFIC requires the <i>applicant</i> to disclose/publish environmental and social documents in relation to Category A transactions. It is the applicant, not EFIC, which makes this disclosure.</p> <p>In accordance with an Act of the Australian Parliament, <i>the Environment Protection and Biodiversity Conservation Act</i>, EFIC is required to publicly disclose how its actions accorded with the principles of ecologically sustainable development in its Annual Report</p>
2	Austria	<p>Austrian disclosure policy has to take into account various legal provisions, <i>i.e.</i> the Banking Act (stipulates banking secrecy), the Data Protection Act and the Export Guarantees Act (the latter stipulates confidentiality as follows: "All persons engaged in the handling and examination of applications for the assumption of liabilities are obliged to treat confidentially any official, commercial and managerial secrets which have come to their knowledge when so acting").</p> <ul style="list-style-type: none"> - Thus the Export Guarantees Act expressly precludes disclosure prior and after decision on official support by the Ministry of Finance and OeKB. - Neither the Ministry of Finance nor OeKB are legally precluded from requiring the client to disclose environmental information, as far as the client is owner of the information. <p>Currently, the EU Directive 2003/4/EC is being implemented within the Environmental Information Act in Austria and will be the basis of the environmental disclosure policy in the future.</p>
3	Belgium	<p>We are not entitled to disclose our insurance policies.</p> <p>One of the reasons is the commercial-in-confidence.</p> <p>Moreover, the financial institutions are submitted to professional secrecy. We respect the disclosure policy stated in the Common Approaches.</p>
4	Canada	<p>EDC's Disclosure Policy is a corporate policy and the current draft is expected to be finalized in Q4, 2005. This policy requires consent prior to disclosure in order to meet its legal obligation to protect confidential information entrusted to EDC by its customers in the normal course of conducting its business.</p>

	Countries	<p align="center">6. Legal provisions on disclosure of information</p> <p>a) What are the relevant legal bases for your disclosure policy? Do they preclude your responsible entity (ECA/sponsor/Ministry/..) from disclosure of environmental information; if so, please provide details on the following questions:</p> <ul style="list-style-type: none"> - do they preclude from disclosure prior to or after the decision on official support; - please specify the reason for non-disclosure (e.g. commercial-in-confidence); - if the reason for non-disclosure involves commercial-in-confidence, is your ECA legally precluded from requiring the client to provide the disclosure as a condition of receiving ECA support?
5	Czech Republic	Commercial Code. No legal preclusions, however EGAP may decide on non-disclosure (e.g. for the reason of commercial-in-confidence) on a case-by-case basis. No practice yet. EGAP is not legally precluded from requiring the client to disclose the information.
6	Denmark	EKF is exempted from the Danish Public Administration Act in order to preserve the commercial confidentiality, but EKF is not legally precluded from requiring the client to provide the disclosure.
7	Finland	In its ECA-operations Finnvera needs to follow the Publicity Act and also a specific secrecy regulation that is stated in the Act concerning Finnvera as a company. Both of these regulations include protection against disclosure of a person's financial status and business secrets to outside parties. Finnvera keeps all the information concerning guarantees, including EIAs and the related information, secret unless the relevant person has given his consent to disclosure. Support for Category A projects is however conditional to the permission to publish the environmental information 30 days before final commitment.
8	France	National business confidentiality regulations (Penal Code), EU Directive regarding public disclosure of environmental information (2003/4/EC), Aarhus Convention. These legal bases do not explicitly preclude Coface from disclosure of environmental information, but have been taken into account in Coface's ex-ante and ex-post transparency policies.
9	Germany	Mainly the German criminal and administrative law on one and the German environmental information law on the other hand. The preclusion does not depend on a special point of time like the time of disclosure; any publication of data recorded by the public administration is prohibited by our criminal law if the entity that provided the data does not give his consent before the disclosure. However, under the environmental law based on the EU directive on public access to environmental information, the responsible entity for the federal export guarantees provides specific environmental information on request, provided that no legal exception prevents it from disclosure. One such exception can be business confidentiality. Euler Hermes is legally precluded from requiring the applicant to provide the disclosure as a condition.
10	Greece	All the information included in an insurance policy is regarded as confidential. The criminal law prohibits ECIO to disclose the insurance policy and/or information received there about. ECIO is bound to professional secret.

	Countries	<p align="center">6. Legal provisions on disclosure of information</p> <p>a) What are the relevant legal bases for your disclosure policy? Do they preclude your responsible entity (ECA/sponsor/Ministry/..) from disclosure of environmental information; if so, please provide details on the following questions:</p> <ul style="list-style-type: none"> - do they preclude from disclosure prior to or after the decision on official support; - please specify the reason for non-disclosure (e.g. commercial-in-confidence); - if the reason for non-disclosure involves commercial-in-confidence, is your ECA legally precluded from requiring the client to provide the disclosure as a condition of receiving ECA support?
11	Hungary	<p>The ECAs should not disclose confidential information without the permission of the contractual parties (in line with the relevant provisions of the national Civil Code). Respecting the above, for Category A project the public disclosure is mandatory part of the environmental assessment procedure (as it set forth the OECD Recommendation).</p>
12	Italy	<p>SACE, as the Italian ECA, is subject to national law in terms of commercial confidentiality, sensitive personal data, access to environmental information. No ECA-specific regulations are in place to this respect. According to national law regulating access to environmental information held by public bodies, SACE should be considered precluded from disclosure of environmental information if such a disclosure could result in an infringement of commercial confidentiality.</p> <p>SACE adopted a formal environmental disclosure policy in January 2004; the policy has been approved by the Board of Directors and it provides the modalities for environmental information <i>ex-ante</i> and <i>ex-post</i> disclosure. The policy is available on SACE web-site. For Category A projects, SACE requires applicants to submit a release form permitting it to voluntarily disclose EIAs to the public.</p>
13	Japan	<p>JBIC: Disclosure of information is made pursuant to JBIC's guidelines. In accordance with Information Disclosure Act, JBIC may be requested to disclose additional information. JBIC respects the confidentiality of the commercial and other matters of the borrowers and related parties and observes concurrently the principles of information disclosure and such confidentiality.</p> <p>NEXI: Under the Guidelines, NEXI disclose environmental information on its own initiative.</p>

	Countries	<p align="center">6. Legal provisions on disclosure of information</p> <p>a) What are the relevant legal bases for your disclosure policy? Do they preclude your responsible entity (ECA/sponsor/Ministry/..) from disclosure of environmental information; if so, please provide details on the following questions:</p> <ul style="list-style-type: none"> - do they preclude from disclosure prior to or after the decision on official support; - please specify the reason for non-disclosure (e.g. commercial-in-confidence); - if the reason for non-disclosure involves commercial-in-confidence, is your ECA legally precluded from requiring the client to provide the disclosure as a condition of receiving ECA support?
14	Korea	<p>KEIC: "Law on the Information Disclosure of Public institution" is the legal base for KEIC's disclosure policy</p> <p>This law requires public institutions to disclose public information in response to requests from the public, provided that the information is not exempt from disclosure e.g. business and management confidentiality. KEIC is legally prevented from disclosure if such information includes business confidentiality.</p> <p>- Although there are no expressed provisions precluding KEIC from requiring the client to provide the disclosure as a condition of receiving official support, KEIC requests a written consent from applicants and/or sponsors to avoid legal problems.</p> <p>KEXIM: "Law on the Prevention of Unfair Competition and the Protection of Business Confidential", the "Law on the Use and Protection of the Credit Information" and the "the Law on the Information Disclosure of Public institution" are the legal bases for KEXIM's disclosure policy.</p> <p>Subject to the "Law on the Prevention of Unfair Competition and the Protection of Business Confidentiality", KEXIM should not knowingly or negligently use and disclose illegally obtained business confidentiality. Regardless of whether decision on official support is made or not, the "Law on the Use and Protection of the Credit Information" prevents KEXIM from gathering or investigating such information that includes trade secrets and business confidentiality. KEXIM is also subject to the "the Law on the Information Disclosure of Public institution", which requires public institutions to disclose public information in response to requests from the public, provided that the information are not exempt from disclosure e.g. business and management confidentiality. KEXIM is legally prevented from disclosing if such information includes business confidentiality.</p> <p>There are no expressed provisions precluding KEXIM from requiring the client to provide the disclosure as a condition of receiving official support.</p>
15	Luxembourg	<p>We are not entitled to disclose our insurance policies. One of the reasons is the commercial-in-confidence. Moreover, the financial institutions are submitted to professional secrecy.</p>

	Countries	<p align="center">6. Legal provisions on disclosure of information</p> <p>a) What are the relevant legal bases for your disclosure policy? Do they preclude your responsible entity (ECA/sponsor/Ministry/..) from disclosure of environmental information; if so, please provide details on the following questions:</p> <ul style="list-style-type: none"> - do they preclude from disclosure prior to or after the decision on official support; - please specify the reason for non-disclosure (e.g. commercial-in-confidence); - if the reason for non-disclosure involves commercial-in-confidence, is your ECA legally precluded from requiring the client to provide the disclosure as a condition of receiving ECA support?
16	Netherlands	<p>The Dutch Government itself and related organisations thereto, among which Atradius DSB, fall under the Dutch Act on the disclosure of information on administrative measures. This act recently has been adjusted to the Aarhus Convention to which the Dutch government is a party. The active provision of environmental information that is in the possession of the Government or Atradius DSB is still to be reviewed because of the adjustments made and the implementation of the EU Guideline with regard to the access to environmental information which will be implemented in 2005. The more passive disclosure of environmental information i.e. at the request of a civil party should be honoured under this act, unless one of the exceptions mentioned in the act apply. One of the exceptions mentioned is confidential environmental information that concerns data on enterprises or on production activities. If such information is requested the interest that is protected by this exception and the interest of making public the requested information should be balanced against each other. Other exceptions can be made a.o. for security reasons. In the balancing the exceptions should be interpreted very restrictively and emission data will have to be published at all times. The insured to be, is informed about these obligations of Atradius DSB and the Dutch Government in the application form to obtain export credit insurance. By signing the application form the exporter agrees with the publication of environmental information ex ante and ex post the decision on official support (see question 6d and 6e). If the insured to be can not agree with the publication of this information there will not be an application for an insurance policy unless the environmental information is recognised to be an exception (see earlier). Also, if the insured to be can prove he has ponderous arguments why the publication of ex post information (see also 6 e) should be postponed (later than a month after final commitment), Atradius and the Ministry of Finance can decide to delay publication.</p>
17	New Zealand	<p>The ECO as part of the Treasury is subject to disclosure requirements under the Official Information Act. Commercial confidentiality is able to be maintained via exemption clauses in the Act. However, the ECO is not precluded from requiring disclosure as a condition of receiving support.</p>
18	Norway	<p>Norwegian Public Administration Law has certain restrictions on business confidentiality. However, GIEK will encourage disclosure if the exporter has provided the EIA. If GIEK has provided it, the exporter will be informed that EIA should be disclosed.</p>

	Countries	<p align="center">6. Legal provisions on disclosure of information</p> <p>a) What are the relevant legal bases for your disclosure policy? Do they preclude your responsible entity (ECA/sponsor/Ministry/..) from disclosure of environmental information; if so, please provide details on the following questions:</p> <ul style="list-style-type: none"> - do they preclude from disclosure prior to or after the decision on official support; - please specify the reason for non-disclosure (e.g. commercial-in-confidence); - if the reason for non-disclosure involves commercial-in-confidence, is your ECA legally precluded from requiring the client to provide the disclosure as a condition of receiving ECA support?
19	Poland	<p>No specific legal barriers for exchange and disclosure of environmental information provided the applicant gives written consent. Obligatory excluded from disclosure are matters listed in the Act of Confidential Information or covered by the copyrights and patent rights. Excluded may also be – upon request – information that is commercial or industrial secret.</p> <p>In case of projects with commercial-in-confidence aspects KUKE S.A. could only encourage an applicant to disclose environmental information.</p> <p>Case-by-case decision on cover to be made if an applicant refuses disclosure of information.</p>
20	Portugal	<p>The legal provisions for our disclosure policy are based in the Portuguese General Law on Access to Administrative Documents, which enables COSEC not to disclose the information (environmental matters included) when commercial-in-confidence is involved. This law is currently under review in order to take into account the EU Directive 2003/4/European Community. Moreover, Portugal ratified the Aarhus Convention.</p>
21	Slovak Republic	<p>EXIMBANKA SR internal regulation, Commercial Code, Banking Act</p>
22	Spain	<p>As a general rule, CESCE has a legal obligation to preserve the commercial confidentiality of all business. This rule can be waived by our Guardian Authorities in cases of public interest, which would be the case, for example, of environmental information. To reconcile our commitment with the preservation of commercial confidentiality of business with our policy of public disclosure of environmental information, we seek the consent of the exporter/insured prior to disclosure.</p>
23	Sweden	<p><i>Legal basis for EKN:</i> The Swedish Freedom of Press Act spells out the public's right to access to documents kept by the authorities. The right to access is, however, restricted in certain cases, as spelt out in the Secrecy Act. Two important restrictions applicable on EKN's operations are when access to documents would cause harm to Sweden's relations to other countries as well as international organisations (secrecy relating to foreign affairs) or to the business relations for EKN's customers, or to a person who has entered into business or similar relationship with EKN's customers (commercial confidentiality).</p> <p><i>Legal basis for SEK:</i> Due to the Banking and Financing Business Act, SEK may be precluded from disclosure of information as regards customer (commercial confidentiality).</p>

	Countries	6. Legal provisions on disclosure of information a) What are the relevant legal bases for your disclosure policy? Do they preclude your responsible entity (ECA/sponsor/Ministry/..) from disclosure of environmental information; if so, please provide details on the following questions: - do they preclude from disclosure prior to or after the decision on official support; - please specify the reason for non-disclosure (e.g. commercial-in-confidence); - if the reason for non-disclosure involves commercial-in-confidence, is your ECA legally precluded from requiring the client to provide the disclosure as a condition of receiving ECA support?
24	Switzerland	<p>According to Swiss law, ERG can only disclose information on transactions if the exporter gives his approval. Such an approval process was introduced in November 2002.</p> <ul style="list-style-type: none"> - This applies to disclosure prior to and after decision on official support. - Commercial-in-confidence - Yes
25	Turkey	<p>Taking into account the competitive context and constraints of business confidentiality the exporter is supposed to consent, in advance, that TE may share the information with the relevant international institutions to which TE is responsible for periodical reporting.</p>
26	United Kingdom	<p>ECGD's disclosure policy is based on the Freedom of Information Act 2000, the Environmental Information Regulations 2004 (EIRs) and the common law relating to confidentiality. As a government department, ECGD is also obliged to respond to requests for information made by the UK Parliament.</p> <ul style="list-style-type: none"> - The EIRs specifically provide that public authorities may, subject to a public interest qualification, refuse to disclose environmental information in certain limited circumstances. - Requests for environmental information may be made at any time. ECGD may refuse to disclose information to the extent that the request relates to material that is still in the course of completion, to unfinished documents or to incomplete data in circumstances where the public interest in maintaining the exception outweighs the public interest in disclosing the information. - Section 12 of the EIRs sets out the specific grounds on which disclosure may be refused. These include circumstances where its disclosure would adversely affect: <ol style="list-style-type: none"> 1. international relations, defence, national security or public safety; 2. the course of justice; 3. intellectual property rights; 4. the confidentiality of proceedings where such confidentiality is provided by law; 5. the confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate economic interest; 6. the interests of the person who provided the information (subject to qualifications); and 7. the protection of the environment to which the information relates. <p>Full details can be found on the attached link to the EIRs: http://www.hms.o.gov.uk/si/si2004/20043391.htm</p> <ul style="list-style-type: none"> - No, subject to the constraints imposed on ECGD's decision-making process by administrative law.

	Countries	<p align="center">6. Legal provisions on disclosure of information</p> <p>a) What are the relevant legal bases for your disclosure policy? Do they preclude your responsible entity (ECA/sponsor/Ministry/..) from disclosure of environmental information; if so, please provide details on the following questions:</p> <ul style="list-style-type: none"> - do they preclude from disclosure prior to or after the decision on official support; - please specify the reason for non-disclosure (e.g. commercial-in-confidence); - if the reason for non-disclosure involves commercial-in-confidence, is your ECA legally precluded from requiring the client to provide the disclosure as a condition of receiving ECA support?
27	United States	<p>Under the Freedom of Information Act and other legislation, Ex-Im Bank has established a mechanism for disclosure of non-sensitive and non-proprietary information relative to its actions. In keeping with this policy, Ex-Im Bank requires that copies of EIAs for all Category A projects be made available to interested parties during the period between the time of application for a final commitment and a final decision for official support by Ex-Im Bank (though in no case for a period less than 30 days). The availability of these EIAs also extends to the period following the final decision. To ensure that the disclosed information (EIA) does not contain information that is proprietary or business confidential, Ex-Im Bank requires that the sponsor formally agree to make the EIA available to third parties that request copies of the EIA through Ex-Im Bank.</p>

	Countries	6. Publishing ECA environmental procedural guidance b) Are your (ECAs) procedures for screening and reviewing the potential environmental impacts of projects in the public domain? If so, where can they be found?
1	Australia	Yes. Go to http://www.efic.gov.au/static/efi/environment/environstd.htm
2	Austria	Yes; OeKB-Web site www.oekb.at/control/index.html?id=413112
3	Belgium	See our Web site: www.ondd.be (under “ethics”)
4	Canada	EDC’s Environmental Review Directive; EDC’s fulfilment of the Recommendation and other environmental programs are described on EDC’s Web site at http://www.edc.ca/corpinfo/csr/environment/index_e.htm .
5	Czech Republic	Yes, on http://www.egap.cz/produkty/vliv_vyvozu/index_en.php
6	Denmark	EKF’s procedure for environmental assessment is described on our Web site, where the report “Financing Sustainable Development” reviewing the environmental impact of the 11 projects EKF supported in 2002-2003 also is available. EKF will continue these measurements in order to calculate and monitor the sustainability index on an annual basis.
7	Finland	http://www.finnvera.fi/index.cfm?id=1718
8	France	Yes. They are available on Coface’s Web site at the following addresses: http://www.coface.fr/dmt/rubf_env/indexf.htm (French Version) http://www.coface.com/rub01_gr/gr05_eng01_env01.htm (English Version)
9	Germany	It is available on Euler Hermes’ Homepage www.exportkreditgarantien.de
10	Greece	The section in our web-site concerning the environmental guidelines is under construction.
11	Hungary	Yes. http://www.mehib.hu/english/env/env.htm http://www.eximbank.hu
12	Italy	Yes, available at www.sace.it under the section “Sace and Environment”.
13	Japan	JBIC: They are in the JBIC guidelines. For more details, please refer to the Web site (http://www.jbic.go.jp/english/environ/guide/index.php). NEXI’s Environmental Guidelines and the relevant FAQs can be found on our Web site; http://www.nexi.go.jp/e/08a.html
14	Korea	KEIC: Yes, on our Web site (www.keic.or.kr). KEXIM: Yes, they are available on KEXIM’s Web site www.koreaexim.go.kr .
15	Luxembourg	See our Web site: www.ducroire.lu (under “environnement”)
16	Netherlands	Information on procedures and reviewing is in the public domain and can be found on the Web site at: http://atradius.com/nl/dutchstatebusiness/downloads/milieubrochure.jsp
17	New Zealand	The ECO’s procedure for environmental assessment is described on our Web site.
18	Norway	Yes, on our Web site www.giek.no .
19	Poland	Description of KUKI’s procedure is available on its Web site: http://www.kuke.com.pl/eng/eProtection.html
20	Portugal	The basic guidelines of the environmental approach may be found in COSEC/FGC’s Web site http://cgf.cosec.pt under Environmental Impact.
21	Slovak Republic	Yes, on our Web site www.eximbanka.sk

Countries		6. Publishing ECA environmental procedural guidance
		b) Are your (ECAs) procedures for screening and reviewing the potential environmental impacts of projects in the public domain? If so, where can they be found?
22	Spain	Yes. They are available on CESCE's Web site at the environmental section under the heading "Quienes somos"/"About us", at the following address: http://www.cesce.es/cda/contenido2_id12.jsp?pageid=185&seccion=1&subseccion=4&menu=341
23	Sweden	EKN's environmental policy, guidelines and procedures are published on its Web site, www.ekn.se . For Category A projects EKN publishes on its Web site the EIA, or a summary thereof, at least 30 days before final commitment is issued. EKN also submits an annual comprehensive Environmental Account as part of its Annual Report, containing detailed information on environmental issues in Category A and B projects guaranteed, e.g. key environmental questions, standards used and information required.
24	Switzerland	Internet http://www.swiss-erg.com/portrait/ethik/umwelt/e/index.htm
25	Turkey	Yes. The Environmental Guidelines are published on our web site.
26	United Kingdom	A description of ECGD's Case Impact Analysis Process is posted on ECGD's web site at: http://www.ecgd.gov.uk/ecgd_case_impact_analysis_process_-_may_2004.doc .
27	United States	In addition to being published in hard copy and made available to anyone requesting it, Ex-Im Bank's Environmental Procedures and Guidelines can be downloaded in its entirety directly from Ex-Im Bank's official Web site (www.exim.gov).

	Countries	6. Exchange of Information with other institutions
		c) Procedures and experience in exchanging information with other ECAs/IFIs in situations of co-financing/competition (please provide details)
1	Australia	No specific procedures have been developed for exchange and disclosure of information for IFI or ECA co-financing although such exchanges do regularly occur for specific transactions. Any EFIC involvement with co-financing is undertaken in accord with the requirements of EFIC's Environment Policy.
2	Austria	Austria demands prior consent by the exporter at the start of the environmental assessment to exchange any environmental information deemed necessary. Principally Austria is eager to cooperate with others in the environmental assessment, both in co-financing and as much as possible also in a competitive situation. Environmental assessment reports for Category A and B projects are normally written in English to facilitate the communication with other ECAs/IFIs.
3	Belgium	No experience so far.
4	Canada	EDC is open to sharing information with other lending parties and has had many positive experiences. Some difficulty; however, may occur when the timing of involvement of individual institutions does not coincide.
5	Czech Republic	No experience.
6	Denmark	EKF has not experienced any problems of cooperation or exchanging information with other ECAs/IFIs in situations of co-financing.
7	Finland	Finnvera exchanges environmental information in co- and re-insurance situations with ECAs and in co-financing situations with IFIs.
8	France	Coface supports exchange of environmental information with co-financing ECAs/IFIs and competing ECAs with due respect to business confidentiality. Coface's experience in such situations is that reaching a common position between all involved ECAs/IFIs on a Project's environmental issues significantly facilitates discussions with the other parties (including the exporters and the sponsors/buyers).
9	Germany	In cases of re- or coinsurance as well as in multi sourcing projects, information will be exchanged with other ECAs. Experiences are positive.
10	Greece	No experience.
11	Hungary	Hungarian ECAs have to cooperate with their business partners with exchanging information, although no experience so far.
12	Italy	Normally, informal contacts between practitioners followed by close cooperation throughout the review and monitoring phase. The experience is always positive.
13	Japan	JBIC: No specific procedure and it depend on each case. With respect to projects that are co-financed by other financial institutions, JBIC endeavours to exchange information on environmental and social considerations with the other institutions concerned. NEXI: In the case of project finance with several ECAs involved, generally an environmental due diligence will be conducted and information shared by means such as the assignment of an environmental consultant common to the lenders/ECAs.
14	Korea	KEIC: No specific procedures or experience until now. KEXIM: No specific procedures, but has some experiences with other ECAs/IFIs on co-financing.
15	Luxembourg	No projects presented so far but Web site allows for immediate publication.

	Countries	6. Exchange of Information with other institutions c) Procedures and experience in exchanging information with other ECAs/IFIs in situations of co-financing/competition (please provide details)
16	Netherlands	Exchange of environmental information has proven to be beneficial for all parties involved. The involvement of other ECAs in co-financing situations does not impact Atradius' responsibility as to the existence of sound appraisal reports and transparency in line with the Recommendation. In cases of competition, in principle, exchange of environmental information with other ECA's is considered beneficial and has been done in cases where the exporter was involved or even on request of the exporter.
17	New Zealand	The ECO has not experienced any problems of cooperation or exchanging information with other ECAs/IFIs in situations of co-financing.
18	Norway	GIEK has no specific procedures, but good experience, especially with other ECAs.
19	Poland	No specific legal barriers for exchange and disclosure of environmental information with IFIs and ECAs provided the applicant gives written consent to disclosure. In case of co-financing, KUKI S.A. is authorized to accept EIA provided by other IFI, ECA or foreign partner. No experience so far.
20	Portugal	No experience so far.
21	Slovak Republic	No experience so far.
22	Spain	In case of co-financing, we have some experience of working closely and sharing information with co-financing ECAs/IFIs. We have no experience of requests of information from other ECAs in case of competition. The experience have been positive, except in case ECAs enter into the project at different phases were collaboration is difficult.
23	Sweden	In reinsurance cases, EKN studies the main insurer's environmental review and environmental information and makes its own assessment on basis of that. It is a requirement for reinsurance from EKN that the other ECA follows the OECD Recommendation. In situations of co-financing EKN shares its reports and assessments with other ECAs and IFIs and studies the environmental review made by them, including EIA.
24	Switzerland	Information exchange with IFIs is possible after prior approval by exporter/sponsor. Practice: this is not usually a problem since it is in the interest of the exporter/sponsor. Information exchange with other ECAs is possible after prior approval by exporter/sponsor. Practice: this is not usually a problem since it is in the interest of the exporter/sponsor.
25	Turkey	No specific procedures have been employed and no experience has been reported so far.
26	United Kingdom	ECGD is keen to work closely and share information with co-financing IFIs. ECGD will consider favourably any request to share information with a competing member.

	Countries	6. Exchange of Information with other institutions c) Procedures and experience in exchanging information with other ECAs/IFIs in situations of co-financing/competition (please provide details)
27	United States	In situations of co-financing, Ex-Im Bank has worked closely, without exception, with other financial entities (IFC, EBRD, IaDB, ADB, and other ECAs) which are involved either through co-financing or parallel financing with projects. Ex-Im Bank generally begins its environmental review after major export contracts are negotiated (but before the financing contracts have been concluded). Although Ex-Im Bank has had little experience exchanging environmental information on projects being reviewed that are in competition with foreign ECAs, Ex-Im Bank would endeavour to share information with other ECAs if requested to do so.

	Countries	<p align="center">6. Disclosure of Information to the public : Ex-Ante</p> <p>d) Disclosure procedures and practice: please provide details on the following questions:</p> <ul style="list-style-type: none"> - at what point in the environmental review process is environmental information disclosed to the public. Where information is disclosed prior to the decision on official support, please provide details; - what is the scope and content of such information; - who is responsible for disclosing such information (ECA/sponsor/Ministry...) - Please specify the media used for disclosure, e.g. Web site, information center, etc.; - disclosure period (i.e. how many days prior to Final Commitment?); - are there any circumstances in which environmental information relating to Category A projects in connection with ECA facilities of more than SDR 10 million is not disclosed prior to commitment? If so, please provide details.
1	Australia	<ul style="list-style-type: none"> - As required by the OECD Common Approaches, relevant environmental and social impact information is publicly disclosed for a period of 30 days before a decision for official support is made in relation to a Category A transaction. - Information disclosed is usually the environmental and social impact assessment documentation and any associated environmental management plans. - The disclosure of environmental and social documentation is made by the applicant, or someone other than EFIC, acting for, or working with, the applicant. EFIC provides a link on its web site to the EIA documents located on the sponsor, exporter or an external financial institution's (e.g. the World Bank Group) web site. - information is disclosed through the web. - the disclosure period is at least 30 days prior to the decision on official support for a Category A facility. - since implementation of EFIC's Environment Policy in 2000, there have been no circumstances where disclosure has not been undertaken prior to the decision for official support.
2	Austria	<ul style="list-style-type: none"> - for Category A projects at least 30 days prior to final commitment according to the OECD Recommendation. Exporters are encouraged to contact stakeholders already early in the project development phase and are also encouraged to make the project public earlier than the minimum of 30 days. - category, sector and type of project, country, contact for further information (e.g. EIA) - OeKB - OeKB-Web site - at least 30 days prior to final commitment - in theory, if the exporter or the sponsor gives good reasons for not disclosing, we would have to consider these. As such cases are expected to be extremely unusual we have no experience so far.

	Countries	<p align="center">6. Disclosure of Information to the public : Ex-Ante</p> <p>d) Disclosure procedures and practice: please provide details on the following questions:</p> <ul style="list-style-type: none"> - at what point in the environmental review process is environmental information disclosed to the public. Where information is disclosed prior to the decision on official support, please provide details; - what is the scope and content of such information; - who is responsible for disclosing such information (ECA/sponsor/Ministry...) - Please specify the media used for disclosure, e.g. Web site, information center, etc.; - disclosure period (i.e. how many days prior to Final Commitment?); - are there any circumstances in which environmental information relating to Category A projects in connection with ECA facilities of more than SDR 10 million is not disclosed prior to commitment? If so, please provide details.
3	Belgium	<p>For Category A projects of more than EUR 10 million (or less, if located in a sensitive area), information will be provided 30 days before the decision of official support.</p> <p>The environmental study can be asked to the responsible of the study. We need the approval of the insured before we make any project information public. A refusal has to be motivated.</p>
4	Canada	<p>EDC conforms to the Recommendation and seeks consent for disclosure 30 days prior to final commitment. EDC's Draft Disclosure Policy will augment EDC's current practices and addresses scope and content of information and responsibility for disclosure.</p> <p>EDC's decision to proceed where consent for disclosure is not granted will be determined case-by-case.</p>
5	Czech Republic	<p>The Exporter is obliged to disclose (preferably on his Web site) EIA results or its summary at least 30 days before the insurance policy becomes effective. EGAP should disclose the basic information about the project – title, country of export, a link where EIA results or its summary can be found.</p> <p>No exemptions.</p>
6	Denmark	<p>For Category A projects, EKF requests that the applicant/sponsor publishes the EIA on his Web site at least 30 calendar days before a final commitment to grant support.</p> <p>In spring 2004, EKF published the report "Financing of sustainable development 2002/2003" which is available on our Web site. The report which is prepared by an external consultant is a comprehensive evaluation of the 11 large projects, for which EKF has provided a guarantee in 2002-2003. The aim is to inform the public about the impact of EKF supported projects on people and the environment.</p> <p>In an attempt to quantify the sustainability impact, an "index for sustainable development" has been developed. The index shows that the 11 projects contribute positively to a sustainable development.</p>

	Countries	<p align="center">6. Disclosure of Information to the public : Ex-Ante</p> <p>d) Disclosure procedures and practice: please provide details on the following questions:</p> <ul style="list-style-type: none"> - at what point in the environmental review process is environmental information disclosed to the public. Where information is disclosed prior to the decision on official support, please provide details; - what is the scope and content of such information; - who is responsible for disclosing such information (ECA/sponsor/Ministry...) - Please specify the media used for disclosure, e.g. Web site, information center, etc.; - disclosure period (i.e. how many days prior to Final Commitment?); - are there any circumstances in which environmental information relating to Category A projects in connection with ECA facilities of more than SDR 10 million is not disclosed prior to commitment? If so, please provide details.
7	Finland	<p>In the case of environmental Category A projects, the granting of a guarantee requires that environmental impact information shall be disclosed 30 days before Finnvera's final commitment to grant guarantee. The relevant parties' consent is required for the disclosure.</p> <p>In a Category A project, a link to a Web site will be published on Finnvera's Web site providing access to the environmental information. The extent of the disclosed information varies depending on the project. The parties may also agree on another method for disclosing the environmental information.</p> <p>In addition, following basic information regarding projects will be published: country of the project, exported goods, name of project, environmental classification (A) and Industry sector. The relevant parties' consent is required for the disclosure.</p>
8	France	<p>For projects classified in Category A, Coface asks the applicant 1/ to provide the environmental impact assessment, 2/ to ask the buyer to disclose environmental information on the project and 3/ to inform Coface of the procedure the buyer has implemented to provide access to the information, and to pass on these information to Coface.</p> <p>A final commitment to grant official support (offer of cover) is only possible 30 days at least after Coface has published on its Web site the name, country and sector of the project, the type of information available, and the way to get access to them.</p> <p>If the buyer does not answer to the letter asking him to disclose environmental information, Coface may disclose on request some of the information available, with due respect to the commercial confidentiality rules at the national, European and international level.</p> <p>This policy does not apply to cash and short term transactions (repayment term of less than two years).</p> <p>List of Category A Projects under consideration and for which some environmental information is currently disclosed can be found at: http://www.coface.fr/dmt/docs/transparence_ex-ante.pdf</p>

	Countries	<p align="center">6. Disclosure of Information to the public : Ex-Ante</p> <p>d) Disclosure procedures and practice: please provide details on the following questions:</p> <ul style="list-style-type: none"> - at what point in the environmental review process is environmental information disclosed to the public. Where information is disclosed prior to the decision on official support, please provide details; - what is the scope and content of such information; - who is responsible for disclosing such information (ECA/sponsor/Ministry...) - Please specify the media used for disclosure, e.g. Web site, information center, etc.; - disclosure period (i.e. how many days prior to Final Commitment?); - are there any circumstances in which environmental information relating to Category A projects in connection with ECA facilities of more than SDR 10 million is not disclosed prior to commitment? If so, please provide details.
9	Germany	<p>In accordance with the regulations of the OECD Recommendation environmental information of Category A projects is published 30 days prior to final commitment on our homepage. This contains a short description of the project data and a link to the EIA. Additionally applicants of all projects (Category A, B, C) with an order value exceeding EUR 15 million and data of selected projects of special public interest below this threshold are requested to grant their approval for publication of certain project data. Given the consent of the applicant to public disclosure, the project data will be added to a list of project information that can be viewed on the Web site of Euler Hermes. Euler Hermes is responsible for disclosing such information and there is no special disclosure period.</p>
10	Greece	<p>We are in line with the OECD Recommendation.</p>
11	Hungary	<ul style="list-style-type: none"> - Ex-ante disclosure is required in cases when an EIA is mandatory. - For Category A projects the Environmental Impact Assessment (the key findings) has to be disclosed as far as possible at least 30 days prior to the commitment. - Access to the environmental information through ECAs' web site.
12	Italy	<p>For Category A projects, EIAs are disclosed for 30 days before the final decision of guarantee is taken by the Board. Project sponsors are preferably responsible for the disclosure but, if it is more suitable, SACE can disclose news on its Web site and make the study available under request. Since the disclosure policy applies to all new transactions after January 2004, transactions presented for cover before January 2004 are not normally disclosed prior to commitment.</p>

	Countries	<p align="center">6. Disclosure of Information to the public : Ex-Ante</p> <p>d) Disclosure procedures and practice: please provide details on the following questions:</p> <ul style="list-style-type: none"> - at what point in the environmental review process is environmental information disclosed to the public. Where information is disclosed prior to the decision on official support, please provide details; - what is the scope and content of such information; - who is responsible for disclosing such information (ECA/sponsor/Ministry...) - Please specify the media used for disclosure, e.g. Web site, information center, etc.; - disclosure period (i.e. how many days prior to Final Commitment?); - are there any circumstances in which environmental information relating to Category A projects in connection with ECA facilities of more than SDR 10 million is not disclosed prior to commitment? If so, please provide details.
13	Japan	<p>JBIC: Upon completion of the screening of the project JBIC discloses on its Web site, the project name, country, location an outline and sector of the project, and its category as well as the reasons for that classification. In addition, for Category A/B projects, JBIC publishes the status of major documents on environmental and social considerations submitted to JBIC by the borrowers and related parties such as EIA reports and environmental permit certificates issued by the host government on JBIC Web site, and promptly make available the EIA reports etc. in the information center of JBIC. Furthermore, EIA reports for Category A projects are required to be made available in the country and to the local residents where project is to be implemented. Ex-ante disclosure period is until the execution of the loan agreement. For more details, please visit JBIC's Web site (http://www.jbic.go.jp/english/environ/).</p> <p>NEXI:</p> <ul style="list-style-type: none"> - Upon completion of the screening, all projects classified as Categories A, B and C will be disclosed. - The project name, country, location, outline of the project, category classification and its reason will be disclosed. - NEXI will disclose such information, paying due consideration to commercial confidentiality, and with prior consent obtained from the applicant. - NEXI's Web site (Japanese). - For Category A projects, information on screening results are generally disclosed for minimum of 45 days or more.

	Countries	<p align="center">6. Disclosure of Information to the public : Ex-Ante</p> <p>d) Disclosure procedures and practice: please provide details on the following questions:</p> <ul style="list-style-type: none"> - at what point in the environmental review process is environmental information disclosed to the public. Where information is disclosed prior to the decision on official support, please provide details; - what is the scope and content of such information; - who is responsible for disclosing such information (ECA/sponsor/Ministry...) - Please specify the media used for disclosure, e.g. Web site, information center, etc.; - disclosure period (i.e. how many days prior to Final Commitment?); - are there any circumstances in which environmental information relating to Category A projects in connection with ECA facilities of more than SDR 10 million is not disclosed prior to commitment? If so, please provide details.
14	Korea	<p>KEIC:</p> <ul style="list-style-type: none"> - KEIC's disclosure procedures and practices are in accordance with the Recommendation. - The project name, country, location, and category classification, etc. - KEIC discloses such information on its Web site, paying due consideration to commercial confidentiality, and with prior consent obtained from the applicant. - The information on Category A projects is available at least 30 calendar days before the final commitment. <p>KEXIM:</p> <p>In principle, KEXIM's disclosure procedures and practices are in accordance with the Recommendation.</p> <ul style="list-style-type: none"> - Sponsors/borrowers' prior consent is required for the disclosure. - Disclosed information encompasses general description of project, location, a procedure to access an EIA/ summary of an EIA, etc.
15	Luxembourg	<p>For Category A projects, information will be provided 30 days before the decision of official support.</p> <p>The environmental study can be asked to the responsible of the study. We need the approval of the insured before we make any project information public. A refusal has to be motivated.</p>

	Countries	<p align="center">6. Disclosure of Information to the public : Ex-Ante</p> <p>d) Disclosure procedures and practice: please provide details on the following questions:</p> <ul style="list-style-type: none"> - at what point in the environmental review process is environmental information disclosed to the public. Where information is disclosed prior to the decision on official support, please provide details; - what is the scope and content of such information; - who is responsible for disclosing such information (ECA/sponsor/Ministry...) - Please specify the media used for disclosure, e.g. Web site, information center, etc.; - disclosure period (i.e. how many days prior to Final Commitment?); - are there any circumstances in which environmental information relating to Category A projects in connection with ECA facilities of more than SDR 10 million is not disclosed prior to commitment? If so, please provide details.
16	Netherlands	<p>Environmental information on projects will be published as soon as a transaction is categorised as 'A' and the EIA is available. Information on potentially high impact projects for which Atradius support is requested, can be found on the web site at: http://atradius.com/nl/dutchstatebusiness/overheid/milieu/320publicatiemilieuinformatie.jsp. All category A applications were published from the 1st of September 2004 onwards.</p> <p>The scope of the information is to make environmental impact information publicly available and to get additional information.</p> <p>Atradius publishes on the website a description of the project, the location and the internet address where the environmental information can be found. If there is no internet address where the information is available on request, Atradius could provide a copy of the EIA, when a request is made in response to ex ante publication.. Publication will be during a period of 30 days prior to final commitment. If information would clearly be commercially very sensitive it can be decided by Atradius DSB that the commercial sensitive parts of the information on a particular transaction are not published or that the publication thereof will be postponed. See also question 6a.</p>
17	New Zealand	None at this stage – no Category A and B projects to report. It is likely that disclosure will occur via the Web site.
18	Norway	No information is made public before the policy is issued. As for the EIAs, see 6. a)

	Countries	<p align="center">6. Disclosure of Information to the public : Ex-Ante</p> <p>d) Disclosure procedures and practice: please provide details on the following questions:</p> <ul style="list-style-type: none"> - at what point in the environmental review process is environmental information disclosed to the public. Where information is disclosed prior to the decision on official support, please provide details; - what is the scope and content of such information; - who is responsible for disclosing such information (ECA/sponsor/Ministry...) - Please specify the media used for disclosure, e.g. Web site, information center, etc.; - disclosure period (i.e. how many days prior to Final Commitment?); - are there any circumstances in which environmental information relating to Category A projects in connection with ECA facilities of more than SDR 10 million is not disclosed prior to commitment? If so, please provide details.
19	Poland	<p>The modification foresees that :</p> <p>The applicants are encouraged to make public on Web sites EIA or its summary for Category A projects not later than 30 days before final decision.</p> <p>KUKE's Environmental Guidelines provide for public access to the information on Category A projects prior to the decision. For these projects EIA or its summary is posted on Web site of KUKE SA.</p> <p>Scope and content of the information depend on the project classification, submitted papers and kind of requested data. For Category A projects environmental information includes full content of the EIA.</p> <p>KUKE S.A. is responsible for disclosing of any information.</p> <p>Generally, Internet might be used for disclosure.</p> <p>According to the Guidelines the information on Category A projects is available at least 30 days prior to the decision.</p> <p>In some cases the information on Category A project can be excluded from disclosure if part or all of it is classified.</p>
20	Portugal	<p>COSEC will seek to make Environmental Impact Information (EII) of all new transactions classified as Category A publicly available, in our website, at least 30 days before a final commitment to grant official support. In cases where EII cannot, for confidentiality reasons, be publicly available, COSEC can accept to disclose a summary of the EII as complete as possible, upon applicant's prior consent. If, for exceptional reasons, environmental impact information is not allowed to be published, COSEC should explain its circumstances in the annual reporting to the OECD Secretariat.</p>
21	Slovak Republic	<p>No information is made public before the policy is issued.</p>
22	Spain	<p>Information about the environmental impact of Category A projects is disclosed through our Web site provided the exporter gives his consent, as soon as we receive an EIA with acceptable conclusions. Usually this happens once a preliminary decision has been taken but before the final commitment is made. Issue of final commitment is withheld until information has been available for at least 30 days. Information includes: name of the project, location, type of information available, contact person, and date of disclosure. If local legislation does not require public disclosure, we hold the exporter responsible for it.</p>

	Countries	<p align="center">6. Disclosure of Information to the public : Ex-Ante</p> <p>d) Disclosure procedures and practice: please provide details on the following questions:</p> <ul style="list-style-type: none"> - at what point in the environmental review process is environmental information disclosed to the public. Where information is disclosed prior to the decision on official support, please provide details; - what is the scope and content of such information; - who is responsible for disclosing such information (ECA/sponsor/Ministry...) - Please specify the media used for disclosure, e.g. Web site, information center, etc.; - disclosure period (i.e. how many days prior to Final Commitment?); - are there any circumstances in which environmental information relating to Category A projects in connection with ECA facilities of more than SDR 10 million is not disclosed prior to commitment? If so, please provide details.
23	Sweden	For Category A projects EKN publishes on its Web site, www.ekn.se , the EIA, or a summary thereof, at least 30 days before final decision.
24	Switzerland	<ul style="list-style-type: none"> - disclosure for A and B projects with a project value of SDR 6 million and more after application for promise of guarantee has been received, subject to prior approval by exporter - country, sector and project name and/or export good - ECA (however sponsor is responsible for publishing EIA) - Web site - At least 30 calendar days No
25	Turkey	There exist no specific procedures for disclosure of information. Also, no information has been made public up to date due to the lack of experience in medium term.
26	United Kingdom	ECGD discloses, subject to the exporter's consent, on its Web site, brief information (project name, project location, source of environmental information) about Category A projects relating to applications that it has received. ECGD also encourages public disclosure of project information by project sponsors and expects, for Category A projects, that project sponsors will make EIAs publicly available for at least 30 days prior to ECGD's final commitment of cover.
27	United States	<p>Ex-Im Bank lists all Category A and Category B applications on its Web site. The list contains the name, description, location and date of posting of the pending applications (corresponding to the date of final application for financing). For Category A projects, the date that the EIA was made available by the project sponsor is also listed (generally the same as the date of application.). Ex-Im Bank makes the EIA (for Category A projects) available to the public by posting their availability on this Web site with instructions on who and how to contact Ex-Im Bank to obtain a copy of the EIA.</p> <p>For all Category A applications, the sponsor is required to officially provide Ex-Im Bank with permission to make the EIA available to interested parties at the time of final application. Commensurate with the OECD Recommendation, the EIA must be available for at least 30 days before a final decision is made with respect to financing. In practice, the EIA availability period generally exceeds 60 days.</p>

	Countries	<p align="center">6. Disclosure of Information to the public : Ex-Post</p> <p>e) Disclosure procedures and practice: please provide details on the following questions:</p> <ul style="list-style-type: none"> - how often does your responsible entity make available to the public ex-post information on projects classified in Categories A and B; - what is the scope and content of such information; - who is responsible for disclosing such information (ECA/sponsor/Ministry...) - please specify the media used for disclosure, e.g. Web site, information center, etc.; - disclosure period.
1	Australia	<ul style="list-style-type: none"> - Ex-post disclosure is through the EFIC Annual Report - information disclosed is general transaction details (country, product, value, exporter, environmental category etc) - The Annual Report is prepared by EFIC for presentation to the Australian Parliament - The report is a published document. It is also available on the EFIC web and through libraries. It is posted to an extensive mailing list - the document is available all year on the web and back copies are available through libraries.
2	Austria	<ul style="list-style-type: none"> - shortly (a few days) after the decision for official support has been made and the exporter has given his consent. - project description , environmental category, approximate volume, country; changes in the presentation are foreseen in the near future - OeKB - OeKB-Web site (www.oekb.at/Exportservice/Produkte&Services/Projektinformationen) - not defined yet, currently at least 2 years
3	Belgium	<ul style="list-style-type: none"> - Ex-Post disclosure is made on a monthly basis. - The information contains as follows; Exporter, Project, Country of destination, Counterpart, Category of the contract, environmental classification, Link with E.I.A. - The information is available on our Web site (www.ondd.be)
4	Canada	EDC discloses ex-post transaction information in accordance with its Disclosure Policy. Information on Category A and B projects is also publicly disclosed annually in the “Chief Environmental Advisor’s Report”. All information is available via EDC’s Web site.
5	Czech Republic	Ex-post disclosure of information is not required by EGAP.
6	Denmark	EKF’s report “Financing Sustainable Development” evaluates the impact of EKF supported projects on people and the environment and measuring the sustainability. EKF will continue these measurements in order to calculate and monitor the sustainability index on an annual basis, and the results will be published.
7	Finland	Following basic information regarding projects will be published on Finnvera’s Web site: country of the project, exported goods, name of project, environmental classification, and industry sector. The relevant parties’ consent is required for the disclosure.

	Countries	6. Disclosure of Information to the public : Ex-Post e) Disclosure procedures and practice: please provide details on the following questions: - how often does your responsible entity make available to the public ex-post information on projects classified in Categories A and B; - what is the scope and content of such information; - who is responsible for disclosing such information (ECA/sponsor/Ministry...) - please specify the media used for disclosure, e.g. Web site, information center, etc.; - disclosure period.
8	France	Coface discloses quarterly on its Web site a list of all transactions above EUR 10 million for which a final commitment has been granted and the commercial contract has been signed during the reporting quarter, including for each transaction its environmental classification and a summary of Coface's environmental review. There is no disclosure period since this information remains on Coface's Web site once initially published. This list is available at the following address: http://www.coface.fr/dmt/rubc_asscrexp/ace07_cont.htm
9	Germany	See 6d. Additionally, ex post information is summarised in our annual report.
10	Greece	We are in line with the OECD Recommendation.
11	Hungary	- Ex-post disclosure yearly - General transaction information is disclosed (destination country, product, contract size, exporter, environmental category, environmental impact). - Ex-post disclosure can be in ECAs' Annual Reports or on their web sites.
12	Italy	Ex-post disclosure is on a 4-monthly basis on SACE Web site; information are provided in a table format containing the following columns: country, project description, industrial sector, environmental category, environmental standards adopted, amount. Every table remains available on the Web site when a new one is added. SACE is responsible for the disclosure.
13	Japan	JBIC: After executing a loan agreement, JBIC provides the results of its environmental reviews of projects as well as Screening Form in Category A/B and FI for public perusal on the JBIC Web site. For more details, please visit JBIC's Web site (http://www.jbic.go.jp/english/environ/). NEXI: - All projects classified as Categories A and B will be subject to Ex-Post disclosure. - The summary of environmental reviews and contents of the screening form will be disclosed. - NEXI will disclose the results paying due consideration to commercial confidentiality, and with prior consent obtained from the applicant. - NEXI's Web site (Japanese) - No disclosure period is set for environmental review results.

	Countries	6. Disclosure of Information to the public : Ex-Post e) Disclosure procedures and practice: please provide details on the following questions: - how often does your responsible entity make available to the public ex-post information on projects classified in Categories A and B; - what is the scope and content of such information; - who is responsible for disclosing such information (ECA/sponsor/Ministry...) - please specify the media used for disclosure, e.g. Web site, information center, etc.; - disclosure period.
14	Korea	<p>KEIC:</p> <ul style="list-style-type: none"> - KEIC's disclosure procedures and practices are in accordance with the Recommendation. - The summary of environmental review will be disclosed. - KEIC discloses such information on its website with prior consent obtained from the applicant. - No specific disclosure period is defined. <p>KEXIM: In principle, KEXIM's disclosure procedures and practices are in accordance with the Recommendation.</p> <ul style="list-style-type: none"> - A summary of ex-post information can be found on KEXIM's Web site. - Sponsors/borrowers' prior consent is required for the disclosure.
15	Luxembourg	<ul style="list-style-type: none"> - Ex-Post disclosure is made on a monthly basis. - The information contains as follows; Exporter, Project, Country of destination, Counterpart, Category of the contract, environmental classification, Link with E.I.A. - The information is available on our Web site (www.ducroire.lu).
16	Netherlands	<p>One month after issuing the policy the following data will be published: country, name of the buyer, name of the exporter/sponsor/financier, description of the transaction, amount covered, environmental impact categorisation (A, B or C), the name of the possible public guarantor and notice of whether the transaction will be partly or fully financed with Tied Aid. The information is published by Atradius on our website under: http://atradius.com/nl/dutchstatebusiness/overheid/afgegevenpolissen/ . All issued policies from the 1st of July of 2002 are published.</p>
17	New Zealand	None at this stage – no Category A and B projects to report. It is likely that disclosure will occur via the Web site.
18	Norway	An extract of the project is published on our Web site when the policy is issued.
19	Poland	Ex post information on Category A and B projects will be published once a year as an annual report, according to Reporting Templates approved by the ECG. KUKES S.A. is responsible for disclosing such information. The information will be available on KUKES's Web site or within the link given to applicant's Web site.
20	Portugal	Information on transaction classified in Categories A and B will be publicly available, in COSEC/FCG's website, at least annually, and shall include: the project description and/or sector, the environmental category, the country and the amount officially supported (upon applicant's prior consent).
21	Slovak Republic	Only general information is disclosed subject to prior approval of the exporter.

	Countries	<p align="center">6. Disclosure of Information to the public : Ex-Post</p> <p>e) Disclosure procedures and practice: please provide details on the following questions:</p> <ul style="list-style-type: none"> - how often does your responsible entity make available to the public ex-post information on projects classified in Categories A and B; - what is the scope and content of such information; - who is responsible for disclosing such information (ECA/sponsor/Ministry...) - please specify the media used for disclosure, e.g. Web site, information center, etc.; - disclosure period.
22	Spain	<p>We publish on CESCE's Web site, on a quarterly basis, a brief description of transactions classified in Categories A and B, with a value greater than 10 million euros, which policies have been issued during the reporting quarter. Every list remains available on the Web site when a new one is added.</p> <p>We also publish, through our Web site, an annual report about experience and statistics on the application of our environmental policy (percentage, number, sector and results of the review about applications under each Category A, B or C). It includes a list of Category A and B projects.</p>
23	Sweden	<p>EKN publishes a separate annual comprehensive Environmental Account as part of its Annual Report, containing detailed information on environmental issues in Category A and B projects guaranteed, e.g. key environmental questions, standards used and information required. The report is published on EKN's Web site, www.ekn.se.</p>
24	Switzerland	<ul style="list-style-type: none"> - At present every three months (ERG also publishes Category C projects with a delivery value of SDR 6 million or more) - Country, Exporter, Export Goods/Project, Delivery value (in categories), tenor, environmental category, additional information (e.g. Project Web site) - ECA - Web site - Approximately one year, sometimes more
25	Turkey	<p>There exist no specific procedures for disclosure of information. Also, no information has been made public up to date due to lack of experience in medium-term.</p>
26	United Kingdom	<p>ECGD discloses, subject to the exporter's consent, in its annual report, brief information (exporter's name, project description, value of cover and potential impact category (high/medium/low)) on all guarantees issued.</p>
27	United States	<p>For Category A projects, EIAs that are made available before Ex-Im Bank makes a final decision with respect to financial support continue to be available, ex-post. These EIAs are generally made available on electronic media (CD-roms). At the end of each year, beginning in early 2005, Ex-Im Bank also will publish on its Web site a list of all Category A and Category B transactions for which financial support was officially provided during the previous year. The list will include a brief description of the project and information about the environmental aspects of these projects.</p>

7- COSTS

	Countries	7. Costs: detail
		a) What additional costs have resulted from the implementation of environmental guidelines; please provide details on such costs, e.g. additional staff, review of EIAs, staff training, site visits, etc.?
1	Australia	All costs associated with managing the implementation and operation of the Environment Policy are met internally.
2	Austria	<ul style="list-style-type: none"> - Any staff needed is paid by OeKB. - Staff training is paid by OeKB. - Administrative work (e.g. establishing/publishing environmental procedures, creating awareness of exporters, documentation, databank, contacts with environmental practitioners) is covered by OeKB's general budget. - Costs for screening and categorising projects are included in the general cost of processing guarantee applications. - The costs for review of EIAs and other environmental information, and the environmental assessment of projects categorised as A/B are charged to the applicant; however, this assessment fee for Category A/B projects is limited to EUR 10 000. This is exclusive of additional costs like onsite visits, consultant fees etc. - Site visits are carried out at the expense of the applicant (only travel costs).
3	Belgium	<p>Additional costs result from:</p> <ul style="list-style-type: none"> - recourse to an external consultant, in order to set up our environmental policy; - review of E.I.A.; <p>eventually, travel expenses</p>
4	Canada	EDC has a dedicated team of environmental specialists responsible for the screening and review of projects for which EDC is asked to consider support. This dedicated team provides support to our Business Teams.
5	Czech Republic	The implementation of the environmental guidelines according to the OECD Recommendation was shared between EGAP and the Government. EGAP's staff training costs are covered by EGAP itself.
6	Denmark	The additional cost in the form of internal staff hours, training, external consultant and site visits are carried by EKF.
7	Finland	Implementation of the guidelines involves costs related to additional staff, actual environmental due diligence and integrating necessary functionalities related to the environmental procedure into the IT-system etc..
8	France	All internal costs (screening, environmental review of the projects...) are paid by Coface. Coface has currently two environmental specialists.
9	Germany	The implementation caused additional costs resulting from additional staff, staff training, travel costs, review of EIAs and other information, developing a work flow, etc.
10	Greece	<p>The additional costs resulting from:</p> <ol style="list-style-type: none"> 1. The Environmental consultant 2. Revision of our environmental policy
11	Hungary	Costs of screening and review are borne by the ECAs. Case by case external consultant can be commissioned by the ECAs. No specialised staff.

	Countries	7. Costs: detail a) What additional costs have resulted from the implementation of environmental guidelines; please provide details on such costs, e.g. additional staff, review of EIAs, staff training, site visits, etc.?
12	Italy	Additional costs, born by SACE, are related to: - external consultant for the first development of environmental guidelines - staff of 2 environmental engineers, 1 stagier - training of the staff - external consultants and travel expenses when not related to structured finance transactions
13	Japan	JBIC: All the costs resulting from the implementation of environmental guidelines are budgeted. NEXI: The additional costs have been incurred in such areas as environmental reviews (by obtaining more assistance from external environmental consultants) and site visits.
14	Korea	KEIC: Staff training, review of EIAs, site visits and advice from external environmental consultant, etc. KEXIM: Additional staff, staff training, out-of-pocket expenses, review of EIAs, etc.
15	Luxembourg	On a case by case basis we may use a consultant specialised in environmental matters. Costs of training are borne by ODL as well as the costs of an external consultant, when required.
16	Netherlands	The Dutch Government has borne the additional costs of Atradius of implementing the environmental procedures and training. She is also bearing the operational costs of Atradius and in addition the external environmental consultancy costs. The costs related to the provision of environmental information (reports, site visits) are to be borne by the applicant/sponsor.
17	New Zealand	It is anticipated that the additional cost in the form of internal staff hours, training, external consultant and site visits will be carried by the ECO. This will however be considered on a case-by-case basis.
18	Norway	No specialist; but had external help when implementing former guidelines and the OECD Recommendation. Extra costs in connection with actual cases will normally be borne by exporters.
19	Poland	Cost of introduction of the new environmental guidelines have been borne by ECA Cost for external environmental expert is on ECA' side and review cost on applicant's side.
20	Portugal	Implementation of the environmental guidelines can result in additional costs but at this stage the experience has not been extensive Therefore, only increases in workflow and staff training were noted.
21	Slovak Republic	It is understood that staff training would be borne by EXIMBANKA SR. No environmental specialist in staff. Extra costs connected with the concrete case (site visits) normally should be borne by the exporter. EIA costs are usually borne by the exporter.
22	Spain	Costs associated with the development and up date of a screening tool, employment of two full-time environmental specialists and staff training are borne by CESCE.

	Countries	7. Costs: detail a) What additional costs have resulted from the implementation of environmental guidelines; please provide details on such costs, e.g. additional staff, review of EIAs, staff training, site visits, etc.?
23	Sweden	EKN has considerable costs for development and revision of policy, guidelines, questionnaires, manuals for internal procedures, consultations with stakeholders, training of staff and clients etc. For its own reviews EKN has a cost of one employee (environmental analyst). EKN also has costs for outside expertise. All costs are covered (via premium) by Swedish exporters and banks.
24	Switzerland	Additional position of environmental practitioner created in 2002. Now that the new process has been in place for more than a year approximately 30-40% of time used for environmental issues. Cost for external consultants. EIAs for Category A projects are evaluated by an external consultant. Budget per year between SDR 30 000 and 50 000.
25	Turkey	No experience.
26	United Kingdom	Some internal costs have been incurred for the establishment of the Business Principles Unit (2.5 practitioners), staff training, review of EIAs by ECGD staff etc. and these are paid by ECGD. The review of EIAs by independent consultants is normally paid for by the project sponsor. Site visit costs are normally met by the sponsor or exporter.
27	United States	The additional costs associated with the implementation of Ex-Im Bank's revised Environmental Procedures and Guidelines are minimal as Ex-Im Bank has been implementing an environmental review process since 1995 prior to the ratification of the OECD Recommendation. The only measurable difference in the cost of implementing its revised (2004) Environmental Procedures and Guidelines reflects that of formally screening transactions for which Ex-Im Bank liability is below USD 10 million (in accordance with the provision of the OECD Recommendation directing ECAs to screen projects for which financial support is SDR 10 million or less) to determine whether they are related to a project and any impact on sensitive areas. The total cost of implementing Ex-Im Bank' Environmental Procedures and Guidelines is estimated as follows: Screening – 0.4 (equivalent) full time professional position Review of applications – 3.0 (equivalent) full time professional positions Independent environmental engineer to assist review –USD 150 000/year (sponsor paid) Monitoring/condition enforcement - 1.0 (equivalent) full time professional position Environmental Policy control – 0.5 (equivalent) full time professional position Site visits (Costs covered by sponsor 50% of time) – USD 50 000/year

	Countries	7. Cost-sharing b) What costs are shared during the due diligence process and after the financing agreement has been concluded?
1	Australia	EFIC endeavours to enter into cost recovery or cost sharing arrangements with exporters/project sponsors to cover its transaction review and monitoring costs.
2	Austria	While applications and environmental questionnaires have to be screened for a large number of cases, only a fraction has to be assessed in more detail, causing work with very specific applications. Based on the causation principle Austria specifically charge the applicants of these projects the cost attributed to the extra effort. Austria does not share costs with the sponsor, because it does not have a legal relationship with him. It expects that in some cases, <i>e.g.</i> project finance, the exporter might pass the cost charged to him by OeKB through to the sponsor. If multiple ECAs or IFIs are involved proper coordination and cooperation should avoid double efforts and minimize costs. No specific cost sharing after the signing of the financing agreement so far; a monitoring fee charged to the guarantee holder is under consideration.
3	Belgium	No experience so far.
4	Canada	Cost-sharing is determined on a case-by-case basis.
5	Czech Republic	EGAP bears the costs of screening; sponsors or exporters pay the EIA.
6	Denmark	None.
7	Finland	Costs related to the provision of environmental information is normally on applicant's/exporter's/sponsor's account. Costs of the environmental due diligence is partly incorporated in the handling fee. Remaining/other costs are covered by the premium income.
8	France	EIAs are normally funded by the project sponsor, but it may happen that additional environmental studies (such as emissions dispersion modelling) are performed by the exporter. For project-finance applications, site visits, lender consultants, translation costs, and all costs incurred during the due diligence process and after the financing agreement are normally paid by the project sponsor. For usual export-credit projects, some of these costs, such as translation costs, may be paid by the exporter, others, such as site visits, may be paid by Coface.
9	Germany	Most of the costs are overhead expenses, independent from a special project (<i>e.g.</i> work flow, additional staff, staff training, travel costs). These are borne by the ECA. Travel costs for site visits and costs for providing necessary information (including EIAs) are borne by the exporter/sponsor.
10	Greece	Part of travel costs for site visits and environmental consultant's fees are borne by the exporter/sponsor.
11	Hungary	The costs of EIA review or site visit may be charged for the applicant. No experience so far.
12	Italy	External consultants' costs and travel expenses are normally born by project sponsors in structured finance transactions; in export credit transactions external consultants costs, where needed, can be shared with co-financing IFIs/ECAs.

	Countries	7. Cost-sharing
		b) What costs are shared during the due diligence process and after the financing agreement has been concluded?
13	Japan	<p>JBIC:</p> <p><i>Costs during the due diligence process</i></p> <p>The cost of producing EIA reports is the responsibility of project sponsors. JBIC normally bears other costs including staff training, engaging consultants and site visits.</p> <p><i>After the conclusion of the financing agreement</i></p> <p>Cost of monitoring is the responsibility of project sponsors. Basically, JBIC does not bear any cost after the conclusion of the loan agreement.</p> <p>NEXI:</p> <p>In particular cases, consignment fees of environmental consultants and site visit costs for NEXI environmental practitioners / environmental consultants will be borne by the insurance applicants / project sponsors.</p>
14	Korea	<p>KEIC: Fees for external consultants and costs for underwriter's site visit will normally be paid by the applicant(s) and/or project sponsor(s).</p> <p>KEXIM: In general, KEXIM takes overhead costs, while additional project specific costs are borne by sponsors/borrowers or exporters.</p>
15	Luxembourg	No experience so far.
16	Netherlands	Same as 7 a) above.
17	New Zealand	Cost sharing will be considered on a case-by-case basis, it is likely however that the costs will be borne by the ECO.
18	Norway	Except for site visits exporters would pay. Cost-sharing with ECAs/IFIs is handled case by case.
19	Poland	Applicants (project sponsor or other financial institutions) are invited to borne the costs after the final decision, <i>i.e.</i> costs of environmental assessment and other necessary documentation. KUKE S.A. pays the costs of the review done by environmental expert. No experience so far.
20	Portugal	In principle, all EIAs or other environmental studies costs will be borne by the exporter. On the other hand, the costs of studies and assessments, which should be carried out by an external environmental consultant, will be borne by the Official System.
21	Slovak Republic	No practical experience.
22	Spain	EIAs and monitoring reports are paid by the sponsor or the exporter.
23	Sweden	In EKN's system the applicant bears the costs for all information and reports needed, including EIA reports, complementary studies and summaries EKN requests. EKN pays the costs of independent expert studies/second opinions EKN orders to evaluate the material. Translation of EIA reports in other languages than English will be charged the applicants. Costs for site visits are borne by EKN. Sharing of costs with other ECAs and IFIs is handled case by case.
24	Switzerland	It is anticipated that in the case of large, complex projects, the cost for environmental consultants could easily be very high. A cost sharing with an inverse cap will be used: costs for external consultants up to a value of SDR 11 000 will be paid for by ERG, all additional costs will be allocated back to exporter.

	Countries	7. Cost-sharing b) What costs are shared during the due diligence process and after the financing agreement has been concluded?
25	Turkey	No experience. Yet, some allowance could be added on to the usual "Expenses" item of our loan agreements to compensate for the costs incurred during the due diligence. After the final commitment, monitoring costs including site-visits could be undertaken by our exporter.
26	United Kingdom	Site visits, lender consultants, EIAs, etc. are normally funded directly by the project sponsor. ECGD would consider favourably proposals to share appraisal costs with co-financing ECAs. Other costs are met through ECGD's premium income.
27	United States	Sponsors are always responsible for providing EIAs and/or supplying data to Ex-Im Bank sufficient for it to undertake an environmental review in accordance with the OECD Recommendation. For those applications structured as limited recourse (project finance), sponsors generally pay for site visits and independent environmental reviews. For all other applications, Ex-Im Bank itself generally assumes the total costs for the environmental review.

8- OTHER COMMENTS

	Countries	8. Any Additional Comments
1	Australia	
2	Austria	Austria supports every effort to assure a level playing field among exporters from all OECD-countries. In this respect cost and resource implications of the environmental assessment to applicants (usually the exporters) have to be considered. This matrix should constantly be updated to enable exporters, banks and stakeholders proper comparison of individual procedures.
3	Belgium	None.
4	Canada	None.
5	Czech Republic	None.
6	Denmark	EKF welcomes the proposal to invite IFIs and non-Member Economies to complete the questionnaire.
7	Finland	None.
8	France	None.
9	Germany	None.
10	Greece	None.
11	Hungary	None.
12	Italy	FDIs are voluntarily reviewed with the same principles and procedure as for exports, but the screening questionnaire is replaced by ad hoc questions. Transactions where only ancillary risks coverage is required (no credit therefore repayment term below 24 months) are screened/reviewed on a case by case basis.
13	Japan	None.
14	Korea	None.
15	Luxembourg	None.
16	Netherlands	None.
17	New Zealand	None.
18	Norway	None.
19	Poland	Limited experience. Due to the fact that Polish exporters often act as subcontractors, no cases eligible for environmental review so far.
20	Portugal	None.
21	Slovak Republic	No additional comments. No experience.
22	Spain	None.
23	Sweden	SEK's environmental policy for officially supported export credits coincides with the policy of EKN. SEK will not perform an environmental review for transactions that are supported by EKN guarantees. Normally all SEK officially supported export credits are supported by an EKN guarantee. In case of officially supported export credits with other collateral than an EKN guarantee, SEK will use the experts within EKN or other experts.
24	Switzerland	None.
25	Turkey	None.
26	United Kingdom	None.

	Countries	8. Any Additional Comments
27	United States	When Ex-Im Bank revised its Environmental Procedures and Guidelines on July 1, 2004, it formally adopted 140 MWe as the threshold above which <u>all</u> thermal power plants are classified as Category A. Also, in addition to those World Bank Operational Policies cited in the OECD Recommendation, Ex-Im Bank's Environmental Procedures and Guidelines specifically reference World Bank Operational Policies 4.04 (Natural Habitats), 4.36 (Forestry Operations), 7.50 (International Waterways) and 4.37 (Dam Safety).