

**SURVEY****on the Environment and Officially Supported Export Credits Projects****REPORTING COUNTRY INFORMATION**

JPN-JBIC-SURVEY-JUL-10

Reporting Country Reporting Institution Submission Date Version number **I GENERAL PRINCIPLES****Objectives**

- 1 In general, please describe the policies and practices that you have established to support the objectives of the Recommendation.

JBIC's apolicies and practices are prescribed in JBIC Guidelines for Confirmation of Environmental and Social Considerations, which is in line with the Recommendation.  
<http://www.jbic.go.jp/en/about/environment/guideline/confirm/index.html>

**JPN-JBIC-SURVEY-JUL-10****II SCREENING AND CLASSIFICATION OF PROJECTS****Exemptions**

- 2 Are all applications screened?

**Information requirements**

- 3 What information is required for the screening process?   
Please provide details.

Please see our Screening Form.  
[http://www.jbic.go.jp/en/about/environment/guideline/confirm/pdf/1screening%20form\\_.pdf](http://www.jbic.go.jp/en/about/environment/guideline/confirm/pdf/1screening%20form_.pdf)

**Responsibilities**

- 4 Who is responsible for providing the information required to screen applications?

Any other comments.

- 5 Who within your Export Credit Agency (ECA) is responsible for screening applications?

Please provide details.

Loan departments are responsible for screening applications. Environmental practitioners will assist the loan departments when required.

**Timing**

- 6 At what stage does screening occur in the risk assessment process?

**Scope and criteria of screening**

- 7 Please provide details of how the screening process considers, where appropriate, operational links with associated operations.

JBIC tries to consider the associated facility to be added to the scope to be examined for environmental and social considerations based on the degree of linkage, ownership and the potential impacts of the associated operations.

- 8 Please specify any particular practices followed in screening applications in cases of:

- a) Co-insurance/co-finance with other ECAs or International Financial Institutions (IFIs).

Any other comments.

JBIC screens applications based on our own guidelines in consultation with the other ECAs and/or IFIs involved.

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b) Re-insurance as lead ECA.

Please select

Any other comments.

not applicable

c) Re-insurance as re-insurer.

Please select

Any other comments.

not applicable

**Scope and criteria of screening**

9 What procedures and practices do you have in place to help identify exports of capital goods and services to existing operations[1]?

JBIC has a question dedicated to identifying exports of capital goods and services to existing operations in the Screening Form.

**New projects**

10 What procedures and practices do you have in place to help identify exports of capital goods and services to projects[2]?

JBIC has a question dedicated to identifying exports of capital goods and services to projects in the Screening Form.

**Other exports**

11 How do you screen exports of capital goods and services that are neither to existing operations nor to projects?

In JBIC's screening process, JBIC tries to ascertain whether or not the loan will be used for such transactions as exports of capital goods and services that cannot specify the project. If yes, such transactions are normally classified as Category C.

**Classification system**

12 Does your classification system vary from that of the Recommendation?

Yes

Please provide details.

JBIC's classification system is in general the same with that of the 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 impacts on the environment.

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**Scope of classification**

13 Do you classify exports of capital goods and services

a) that are to existing operations?

Yes

Please provide details.

JBIC classifies exports to existing operations based on potential impacts by the changes/modifications made to the operation.

b) that are neither to existing operations nor to projects?

Yes

Please provide details.

For exports that are neither to existing operations nor to projects, JBIC classifies them based on the nature and quality of the goods and services being exported. They are normally classified as Category C.

14 In what circumstances do you classify projects in respect of which your share is below SDR 10 million?

JBIC classifies all application regardless of our share.

**Responsibilities for classification**

15 Who is responsible for the classification of projects?

Underwriter and Environmental Practitioner (always jointly)

Responsibility for the classification lies with Loan Departments. They closely consult with Environmental Analysis Department prior to their decision.

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### III ENVIRONMENTAL REVIEW

#### Information requirements

- 16 Do your procedures prescribe the type of information necessary for the review process, or are projects reviewed on a case-by-case basis? Please provide details.

Prescribed procedures

Please provide details.

As a guidance tool, we have a checklist of information that is necessary for the review. However, JBIC may require additional information when needed.

#### Responsibilities

- 17 Who is responsible for providing the information required to review projects?

Applicant (in most cases)

- 18 Who within your ECA is responsible for reviewing projects?

Underwriter and Environmental Practitioner (always jointly)

#### Scope and criteria

- 19 Please provide details of how your review process considers, where appropriate, operational links with associated operations.

JBIC's review process will address cumulative impacts on ambient quality, natural environment, and social environment in relation to the associated operations. The evaluation of such cumulative impacts will be considered in making a final decision for commitment.

- 20 Please specify any particular practices followed in reviewing projects in cases of:

- a) Co-insurance/co-finance with other ECAs, IFIs or your Development Agency.

Would always conduct own review

Any other comments.

JBIC reviews projects based on our own guidelines in consultation with the other ECAs or IFIs involved.

- b) Re-insurance as lead ECA.

Would always conduct own screening

Any other comments.

not applicable

- c) Re-insurance as re-insurer.

Please select

Any other comments.

not applicable

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#### Category A projects

- 21 Under paragraph 9 of the Recommendation, Members should require an Environmental Impact Assessment (EIA) to be undertaken for Category A projects. Are there any circumstances in which you might accept to review a Category A project for which an EIA has not been undertaken or for which either an EIA report is not available for review or does not adequately address all the issues set out in Annex II of the Recommendation?

No

- 22 a) Who is responsible for  
i) Commissioning an EIA?

Project Sponsor (in most cases)

Any other comments.

- ii) Carrying out an EIA?

Project Sponsor (in most cases)

Any other comments.

- b) Who is responsible for providing you with a copy of an EIA report?

Applicant (in most cases)

Any other comments.

- c) Who is responsible for reviewing an EIA report?

Underwriter and Environmental Practitioner (always jointly)

#### Category B projects

- 23 Under paragraph 10 of the Recommendation, the review of Category B projects should examine a project's potential negative and positive environmental impacts.  
Please provide details of your general approach to reviewing Category B projects.

JBIC's scope of examining for Category B projects includes the items of Paragraph 8. In the case where it is necessary to execute EIA based on the laws or regulations of the country where the project is to be implemented, or where project sponsors prepare it on a voluntary basis, JBIC undertakes its environmental reviews based on the EIA. If EIA is unavailable, JBIC seeks alternative documents or sends questionnaire so as to confirm environmental and social considerations when JBIC deems it necessary.

Which, if any, of the items listed in Annex II of the Recommendation and which key environmental factors, such as those listed in paragraph 8 (tired 1) of the Recommendation, are taken into consideration?

#### Annex II:

Executive Summary  In most cases

Policy, legal and  
administrative framework  In most cases

#### Paragraph 8 (tired 1):

significant air emissions,  
effluents, waste or noise  In most cases

significant use of  
natural resources  In most cases

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Project description  In most cases

Baseline data  In most cases

involuntary resettlement  In most cases

Environmental impacts  In most cases

impacts on indigenous peoples  In most cases

Analysis of alternatives  In most cases

cultural property  In most cases

Environmental Management Plan  In most cases

Consultation  In most cases

**Existing operations**

- 24 What procedures and practices do you have in place to review the environmental risks associated with existing operations?

Environmental risk review associated with existing operations is carried out within the screening process based on the information collected by JBIC's Screening Form.

**Other exports**

- 25 Do you review the environmental risks associated with Exports of capital goods and services that are neither to existing operations nor to projects?

Please select

Please refer to our answer to question 13 b).

**Standards**

- 26 How do you ensure that a project is compliant with host country standards?

First of all, JBIC reviews EIA reports to see if it complies with host country standards. JBIC also confirms the letter of approval issued by the relevant authorities. Where necessary, JBIC makes visits to the relevant agencies to reconfirm compliance.

- 27 Paragraph 12 of the Recommendation sets out the general circumstances in which various international standards should be used for the purposes of evaluating the potential environmental impacts of projects. Please provide details of when, in practice, you would use the following international standards for Category A projects:

- a) World Bank Safeguard Policies.  Other than where IFC/RDB standards apply

- b) International Finance Corporation (IFC) Performance Standards.

For private sector limited or non-recourse project finance cases (case-by-case basis)

Please provide details.

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- c) Regional Development Bank standards.

Where such institutions are supporting the project (case-by-case basis)

Please provide details.

- d) Other relevant internationally recognised standards, such as European Community standards.

Case-by-case

- 28 Please provide details of the circumstances, if any, in which you use the following technical international standards for the purposes of evaluating the potential environmental impacts of Category A projects (*i.e.* for sovereign, public / non-sovereign, corporate, limited or non-recourse project finance transactions).

- a) The Pollution Prevention and Abatement Handbook.

JBIC basically uses EHS Guidelines since they have been replaced from PPAH.

Any other comments.

Sovereign  Please select

Regardless of type of transactions, JBIC uses EHS Guidelines instead of PPAH.

Public/non-sovereign  Please select

Regardless of type of transactions, JBIC uses EHS Guidelines instead of PPAH.

Corporate  Please select

Regardless of type of transactions, JBIC uses EHS Guidelines instead of PPAH.

Limited or non-recourse project finance transaction  Please select

Regardless of type of transactions, JBIC uses EHS Guidelines instead of PPAH.

- b) IFC Environmental, Health and Safety Guidelines.

Any other comments.

Sovereign  In most cases

Public/non-sovereign  In most cases

Corporate  In most cases

Limited or non-recourse project finance transaction  In most cases

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- 29 Paragraph 12 of the Recommendation sets out the general circumstances in which various international standards should be used for the purposes of evaluating the potential environmental impacts of projects. Please provide details of when, in practice, you would use the following international standards for Category B projects:

a) World Bank Safeguard Policies.

b) International Finance Corporation (IFC) Performance Standards.

Please provide details.

c) Regional Development Bank standards.

Please provide details.

d) Other relevant internationally recognised standards, such as European Community standards.

- 30 Please provide details of the circumstances, if any, in which you use the following technical international standards for the purposes of evaluating the potential environmental impacts of Category B projects (i.e. for sovereign, public / non-sovereign, corporate, limited or non-recourse project finance transactions):

a) The Pollution Prevention and Abatement Handbook.

Any other comments.

Sovereign

Public/non-sovereign

Corporate

Limited or non-recourse  
project finance transaction

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b) IFC Environmental, Health and Safety Guidelines.

Any other comments.

Sovereign

Public/non-sovereign

Corporate

Limited or non-recourse  
project finance transaction

- 31 Please provide details of any circumstances in which you might apply more than one set of international standards or guidelines.

- 32 Please provide details on the circumstances in which you would use other internationally recognised sector specific or issue specific standards that are not addressed by the World Bank Group.

- 33 Please provide details of your procedures and practices in cases where projects do not meet the international standards or guidelines against which they have been benchmarked.

Site visits

- 34 Please specify in what circumstances you might carry out a site visit as part of the review process.

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### IV EVALUATION, DECISION AND MONITORING

#### Conditions to official support

- 35 How are conditions related to the environment incorporated into documentation prior to or after the decision on official support? Please provide details.

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 funding, that funding will not be extended. 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 are satisfied. When there is a non-compliance with the environmental covenants in the loan agreement after the disbursement of the loan, JBIC may stop the disbursement or accelerate the loan unless that situation is cured.

Please provide examples of any environmental covenants used.

The borrower should implement the project in compliance with our environmental guideline. If it becomes evident that the borrower has not met the conditions required, JBIC may, in accordance with the loan agreement, suspend the disbursement or declare the default.

#### Denying official support

- 36 Under what circumstances would you consider denying support on account of the environmental impacts of a project? Please provide details.

JBIC guidelines prescribe that, "if appropriate environmental and social considerations are not undertaken, JBIC may decide not to extend funding." Such decision would be made on a case-by-case basis. So far, JBIC has no such particular experiences.

Please provide any examples of experience.

#### Monitoring

- 37 Please provide details of your procedures for monitoring, as appropriate, the implementation of a project, regardless of its classification, to ensure compliance with the conditions of your official support, including monitoring frequency/period, content and reporting method.

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:

Case-by-case

Content:

please refer to JBIC's Monitoring Form.  
[http://www.jbic.go.jp/en/about/environment/guideline/confirm/pdf/A04-02-01-01\\_d\\_Monitoring%20Form.pdf](http://www.jbic.go.jp/en/about/environment/guideline/confirm/pdf/A04-02-01-01_d_Monitoring%20Form.pdf)

Reporting method:

please refer to JBIC's Monitoring Form.  
[http://www.jbic.go.jp/en/about/environment/guideline/confirm/pdf/A04-02-01-01\\_d\\_Monitoring%20Form.pdf](http://www.jbic.go.jp/en/about/environment/guideline/confirm/pdf/A04-02-01-01_d_Monitoring%20Form.pdf)

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- 38 i) Who is responsible for undertaking monitoring of projects, including, if appropriate, site visits and preparing monitoring reports?

Other

- ii) Who is responsible for reviewing monitoring information and deciding on compliance?

Underwriter and Environmental Practitioner (case-by-case basis)

Project sponsor is responsible for undertaking monitoring of projects. JBIC is responsible for confirming the monitoring results.

#### Non-compliance measures

- 39 What actions are available to you in cases where monitoring reveals that conditions are not being complied with?

It depends on each case, but in most cases, when there is a non-compliance with the environmental covenants in the loan agreement, JBIC may stop the disbursement or accelerate the loan unless that situation is, or is deemed to be cured within a certain period.

Who is responsible for deciding what actions are appropriate in order to restore compliance?

Other

Please provide details.

Such decision would be made by the Loan Department in consultation with the Environmental Analysis Department and the Policy Department.

Please provide any examples of experience.

When the action plan (e.g. resettlement plan) was delayed, we've encouraged the project sponsor to increase their pace and take appropriate measures.

#### Disclosure of monitoring reports

- 40 i) In what circumstances do you encourage project sponsors to make *ex post* monitoring reports and related information publicly available?

JBIC always encourages project sponsors to follow good practice including disclosure of *ex post* monitoring reports subject to the local legislation.

- ii) In what circumstances, if any, does your ECA require project sponsors to make such information publicly available or itself seek to make such information publicly available?

JBIC discloses such information on its website to the extent that such information is disclosed to public in the project country.

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### V EXCHANGE AND DISCLOSURE OF INFORMATION

#### Environmental procedural guidance

- 41 Have you published national ECA environmental policy statements and procedural guidance?

☐ Yes  
Where can they be found?

☐ JBIC Guidelines for Confirmation of Environmental and Social Considerations

Please provide web address if relevant.

[http://www.jbic.go.jp/en/about/environment/guideline/business/pdf/pdf\\_01.pdf](http://www.jbic.go.jp/en/about/environment/guideline/business/pdf/pdf_01.pdf)

#### Exchanging information

- 42 Please provide details of your procedures and practices in exchanging information with other ECAs and IFIs in situations of
- a) co-insuring/co-financing.
- b) competition.

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 other institutions concerned.

#### Disclosure of project information

- 43 Please provide details of your procedures and practices for disclosing publicly information on Category A projects before a final commitment to grant official support, including:
- a) The scope and content of information released.

Upon completion of the screening of the project, JBIC discloses on its website, the project name, country, location an outline, 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 its website, and promptly make available the EIA reports etc. on either JBIC's website or in the information centre of JBIC. For more details, please visit JBIC's website (<http://www.jbic.go.jp/en/about/environment/guideline/projects/index.html>).

- b) The form and language of the information released.

Japanese and English.

including website address, if relevant.

<http://www.jbic.go.jp/en/about/environment/guideline/projects/index.html>

- c) The required number of days the information should be made available prior to commitment.

No explicit rule. Nonetheless, JBIC endeavours to make the information available for 45 days prior to commitment.

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- d) Any legal constraints to *ex ante* disclosure of such project information (*i.e.* is your ECA legally precluded from making such information publicly available).

No legal constraints besides the general protection of commercially sensitive information.

- e) Any circumstances in which project information relating to Category A projects is not disclosed prior to commitment.

None so far.

- f) Any comments not covered by sub-sections (a)-(e) above.

JBIC Guideline prescribes as follows:

"Prior to making decisions on funding and depending on the nature of the project, JBIC discloses information in principle as set out below. JBIC endeavors to disclose information in a manner that allows enough time before decisions are made on funding and realize further information disclosure by working on project proponents to this end through the borrowers and related parties, in compliance with the relevant laws and ordinances in the host country.

- Upon completion of the screening of a project, JBIC discloses, as soon as possible, the project name, country, location, an outline and sector of the project, and its category classification, as well as the reasons for that classification;
- For Category A and Category B projects, JBIC publishes on its website the status of acquirement of the EIA reports and environmental permit certificates issued by the host government or other appropriate authority (hereinafter collectively referred to as "EIA reports, etc.") obtained from the borrowers and related parties for confirming environmental and social considerations and promptly makes the EIA reports, etc. available on the JBIC website; and
- Of the documents other than the EIA reports, etc. obtained by JBIC from the borrowers and related parties for confirming environmental and social considerations, those being made available to the public in the host country are promptly made available on the JBIC website while the status of acquirement is provided on its website."

#### Disclosure of environmental impact information

- 44 Please provide details of your procedures and practices for requiring that environmental impact information on Category A projects be made publicly available before a final commitment to grant official support, including:

- a) Responsibility for making such information publicly available.

JBIC also requires project sponsors to make EIA reports publicly available in the country and to the local residents where the project is to be implemented.

- b) If the ECA or Guardian Authority is not responsible for such disclosure, please provide details of
- i) how third parties are required to make such information publicly available;

- ii) how this is monitored;

- iii) what measures are available in cases of non-compliance:

- iv) please provide any examples of experience.

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c) The scope and content of information that should be released.

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 its website, and promptly make available the EIA reports etc. on either JBIC's website or in the information centre of JBIC.  
For more details, please visit JBIC's website.  
<http://www.jbic.go.jp/en/about/environment/guideline/projects/index.html>

d) The form and language of the information that should be released (including website address, if released by ECA or Guardian Authority).

Depends on the language in which EIA was written.

website address, if relevant. <http://www.jbic.go.jp/en/about/environment/index.html>

e) The required number of days the information should be made available prior to commitment.

No explicit rule. Nonetheless, JBIC endeavours to make the information available for 45 days prior to commitment.

f) Any legal constraints in *ex ante* disclosure of environmental impact information (i.e. is your ECA legally precluded from requiring the project sponsor to provide the disclosure as a condition of receiving ECA support).

No legal constraints besides the general protection of commercially sensitive information.

g) Any circumstances in which environmental impact information relating to Category A projects is not disclosed prior to commitment.

None

h) Any comments not covered by sub-sections (a)-(g) above.

JBIC Guideline prescribes as follows:  
"Prior to making decisions on funding and depending on the nature of the project, JBIC discloses information in principle as set out below. JBIC endeavors to disclose information in a manner that allows enough time before decisions are made on funding and realize further information disclosure by working on project proponents to this end through the borrowers and related parties, in compliance with the relevant laws and ordinances in the host country.  
• Upon completion of the screening of a project, JBIC discloses, as soon as possible, the project name, country, location, an outline and sector of the project, and its category classification, as well as the reasons for that classification;  
• For Category A and Category B projects, JBIC publishes on its website the status of acquirement of the EIA reports and environmental permit certificates issued by the host government or other appropriate authority (hereinafter collectively referred to as "EIA reports, etc.") obtained from the borrowers and related parties for confirming environmental and social considerations and promptly makes the EIA reports, etc. available on the JBIC website; and  
• Of the documents other than the EIA reports, etc. obtained by JBIC from the borrowers and related parties for confirming environmental and social considerations, those being made available to the public in the host country are promptly made available on the JBIC website while the status of acquirement is provided on its website."

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**Ex post disclosure**

45 Please provide details of your procedures and practices for making available to the public information on projects classified in Category A and Category B for which you have made a final commitment to provide official support, including:

a) How often you make publicly available *ex post* information on projects classified in Category A and Category B.

Immediately after executing each loan agreement.

b) What is the scope and content of such information, including environmental information.

Results of the environmental reviews such as basic information about the project, natural environmental considerations, social environmental considerations, and items to be monitored by the project sponsor.

c) Who is responsible for disclosing such information.

ECA

d) The form and language of the information released

Japanese and English.

including website address, if relevant.

<http://www.jbic.go.jp/en/about/environment/guideline/projects/classify/review.php>

e)

For the entire loan life.

f) Any comments not covered by sub-sections (a)-(e) above.

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### VI REPORTING AND MONITORING OF THE RECOMMENDATION

#### Accountability of your guidelines

- 46 Please provide details of any appropriate measures and mechanisms in place to ensure compliance with your policies and procedures.

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 website (<http://www.jbic.go.jp/en/about/environment/index.html>).

#### Monitoring and Evaluation

- 47 a) Please provide details of any procedures and practices in place to monitor and evaluate your experience of the Common Approaches at a national level.

- b) Please provide details of any procedures and practices in place to share experiences with other Members.

No specific procedure or practice in place, but JBIC does exchange information with stakeholders and other ECAs occasionally.

#### Revising procedures:

- 48 i) When was the last review or update of your environmental procedures conducted? (mm/yy)

July 2009

- ii) What was the motivation for the last review or update of your environmental procedures?

Based on the revision clause of the JBIC's Environmental Guidelines, JBIC updated the Guidelines in July 2009 and they came into full effect in October 2009.

- 49 Are any modifications foreseen in the near future?

Yes

In accordance with the revision clause of JBIC Guidelines, JBIC will start the revision process within 5 years.

#### Resources

- 50 i) What resources have been required as a result of the implementation of your environmental procedures?

JBIC has approximately 15 practitioners in its Environmental Assessment Office. In addition to that, JBIC retains external consultants as necessary for reviewing each project.

- ii) if appropriate, please provide the number of dedicated Environmental Practitioners

15

- iii) if appropriate, please provide the number of external consultants employed by your ECA.

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#### Cost-sharing

- 51 What costs are shared both during the risk assessment process and after the financing agreement has been concluded?

Costs during the due diligence process: the cost of producing EIA reports is the responsibility of project sponsors. JBIC normally bears other costs including consultants' fee and site visits.  
After the conclusion of the financing agreement: cost of monitoring is the responsibility of project sponsors. Basically, JBIC does not bear any cost after the conclusion of the loan agreement.

#### Reporting

- 52 How frequently do you report ex post to the ECG, in accordance with paragraph 22 (tired 1) of the Recommendation, all Category A and Category B projects for which a final commitment has been issued?

Semi-annually

#### Body of experience

- 53 Do you have any practices and procedures in place to collate experience and/or knowledge from individual cases? If so, please provide details.

Each project is neatly filed so that any other practitioners or underwriter can access them and learn from similar cases in the past.

- 54 How do you store and transfer knowledge on environmental issues between Environmental Practitioners and between Environmental Practitioners and Underwriters?

Each project is neatly filed so that any other practitioners or underwriter can access them and learn from similar cases in the past.

- 55 Do you produce any reports on environmental issues in addition to those required by the Recommendation?

Yes

Please provide details.

We issue "Environmental and Social Activities Report" every other year. For more detail, please refer to (<http://www.jbic.go.jp/en/about/environment/report/index.html>).

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**VII OTHER COMMENTS****Scope**

- 56 How are environmental issues relating to exports of capital goods and services and the locations to which these are destined addressed for officially supported export credits with a repayment term of less than two years?

Based on the JBIC Guidelines, we would treat it as the same as those with a repayment term of more than two years.

**Any Additional Comments**

- 57 Please provide any additional comments.