

SURVEY

on the Environment and Officially Supported Export Credits Projects

REPORTING COUNTRY INFORMATION

SWE-EKN-SURVEY-NOV-08

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.

EKN has a policy in place according to the updated Recommendation. EKN also has an environmental manual in place to support the underwriters in their daily work. For deeper environmental analysis EKN has an Environmental Analyst employed.

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II SCREENING AND CLASSIFICATION OF PROJECTS

Exemptions

2 Are all applications screened?

Yes

Information requirements

3 What information is required for the screening process?

Application form

Please provide details of information required.

Information about the projects positive and negative environmental impact. Information about where the project is situated.

Responsibilities

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

Applicant (in most cases)

Any other comments.

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

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

Please provide details.

Usually the underwriter is responsible for the screening. When dealing with complicated cases, i.e. the classification is not clear from the beginning, the environmental analyst will contribute to the process.

Timing

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

When the application is received

Scope and criteria of screening

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

When information is received, or turn up during the screening process, that a project is also including operational links with associated operations, these will be analysed as well.

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).

Would always conduct own screening

Any other comments.

b) Re-insurance as lead ECA.

Would always conduct own screening

Any other comments.

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c) Re-insurance as re-insurer.

Would always conduct own screening

Any other comments.

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]?

Screening of applications (normal screening procedures). Regarding "high risk" sectors, i.e. mining, hydropower, infrastructure and metal, EKN is doing an extended screening of the export.

New projects

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

Screening of applications (normal screening procedures)

Other exports

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

Screening of application (normal screening procedures)

Classification system

12 Does your classification system vary from that of the Recommendation?
Please provide details.

Yes

EKN has the category "free standing deliverers", i.e. trucks for retailer, a pump to a plant for producing drinking water, etc.

Scope of classification

13 Do you classify exports of capital goods and services

a) that are to existing operations?

Yes

Please provide details.

A, B, C and "free standing deliveries"

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

Yes

Please provide details.

A, B, C and "free standing deliveries"

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

When screening shows possible negative environmental impact

Responsibilities for classification

15 Who is responsible for the classification of projects?

Environmental Practitioner (always)

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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.

A cat A project will require an EIA. A cat B project will require some environmental information. Type and quality depending on the project.

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?

Environmental Practitioner (always)

Scope and criteria

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

When information is received, or turn up during the screening process, that a project is also including operational links with associated operations, these will be reviewed as well.

- 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.

- b) Re-insurance as lead ECA.

Would always conduct own screening

Any other comments.

- c) Re-insurance as re-insurer.

Would always conduct own review

Any other comments.

SWE-EKN-SURVEY-NOV-08**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?

Independent Consultant (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?

Environmental Practitioner (always)

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.

Cat B project will require some environmental information. Type and quality depending on the project.

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

Policy, legal and administrative framework

Project description

Baseline data

Paragraph 8 (tired 1):

significant air emissions, effluents, waste or noise

significant use of natural resources

involuntary resettlement

SWE-EKN-SURVEY-NOV-08Environmental impacts impacts on Analysis of alternatives indigenous peoples
cultural property Environmental
Management Plan Consultation **Existing operations**

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

A screening will be made on internet regarding the project and/or the company. When negative information is discovered a deeper analyse will be carried out.

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 provide
details.

Regarding "high risk" sectors, i.e. mining, hydropower, infrastructure and metal, EKN is doing an extended screening/review of the export.

Standards

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

Asking for environmental permits and in some cases monitoring of the on-going project

- 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.

b) International Finance Corporation (IFC) Performance Standards.

Please provide details.

Depending on available information, is the project appraised according to IFC PS this will be accepted.

c) Regional Development Bank standards.

Please provide details.

EKN can use Regional Development Bank standards on a case-by-case basis, for example, if the RDB standards are consistent with or more stringent than the performance Standards or if requested to do so by the Project Sponsor.

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

When no WB standard is available, EC standards will be used as benchmark

- 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.

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

- 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

- 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.

Always

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

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

Please provide details.

Depending on available information, is the project appraised according to IFC PS this will be accepted

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- c) Regional Development Bank standards.

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

Please provide details.

EKN can use Regional Development Bank standards on a case-by-case basis, for example, if the RDB standards are consistent with or more stringent than the performance Standards or if requested to do so by the Project Sponsor.

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

When no WB standard is available, EC standards will be used as benchmark

- 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

- 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.

When specific important emission parameters are not covered by WB standard.

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- 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.

EKN may use other internationally recognised sector specific or issue specific standards where such standards are not addressed by the World Bank, such as World Commission on Dams.

- 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.

EKN always try to have the projects according to international standards. When not in place during appraisal this will be a condition precedent in the guarantee offer

Site visits

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

Always when possible dealing with cat A projects. Sometimes also when dealing with cat B projects

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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.

EKN may have condition precedent in the guarantee offer in case project/export is not corresponding to international standards. Environmental covenants might be included in the loan agreement when possible. Environmental covenants are also included in the guarantee, i.e. reporting procedures and possibility for on site monitoring.

Please provide examples of any environmental covenants used.

See above

Denying official support

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

When a project is not living up to international standard.

Please provide any examples of experience.

EKNs experience is that the guarantee application is withdrawn due to condition precedents in the guarantee offer.

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.

Some projects, due to possible environmental risks are chosen for monitoring. The aim is to have at least two on-site monitoring/year. Some projects reports in written bi-annually or annually to EKN on environmental matters.

Monitoring frequency/period:

see above

Content:

Reporting on project development, emissions or resettlement issues

Reporting method:

see above

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

Environmental Practitioner (always)

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

Environmental Practitioner (always)

Non-compliance measures

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

So far this has not been the case. However this would be negotiated between EKN, involved financier and the project.

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

Other

Please provide details.

No experience

Please provide any examples of experience.

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?

So far this has not been the case, when involved in a WB project this is sometimes accomplished by WB.

- 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?

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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?

Where can they be
found?www.ekn.sePlease provide
web address if
relevant.**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.

[Totally open](#)

- b) competition.

[Totally open](#)**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.

[EIA is made public on EKN's website or by link to project's website. When EIA exists only as hardcopy, information about availability and possibility to be provided with a copy is presented on the EKN website. Project information, such as project name, location, description of the project, is also given on the website.](#)

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

[Swedish and English](#)

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including website address, if relevant.

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

[30](#)

- 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).

[The exporter is contacted before making the information public available. If some technical or process secrets are described in the EIA, the exporter have the possibility to cover such technical details.](#)

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

so far not

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

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,

- a) Responsibility for making such information publicly available.

ECA

- 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.

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

Complete EIA

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

Complete EIA, mostly in English

website address, if relevant.

www.ekn.se

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

30

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- 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

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

No

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

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.

Annual report

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

Classification of project and summary of possible major environmental aspects. Information about what standards the projects has been compared to.

- c) Who is responsible for disclosing such information.

ECA

- d) The form and language of the information released

Annual report in Swedish and English

including website address, if relevant.

www.ekn.se

- e) How long the information remains publicly available.

The annual report will be found up to 3-4 years after publication

- 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.

Reporting to the Guardian Authority about policies and procedures

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.

The environmental work of EKN is continuously evaluated and changes that are deemed necessary are incorporated in the environmental policy and environmental manual

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

Meetings have been carried out with other ECAs concerning environmental procedures. Meetings also have been held concerning more specific issues connected to specific industry sectors.

Revising procedures :

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

December 2007

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

The update of the Common Approaches 2007

- 49 Are any modifications foreseen in the near future?

No

Resources

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

One environmental analyst

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

1

- 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 for translations of EIAs are the responsibility of the exporter.

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.

Updating of the internal environmental manual when "new knowledge appear"

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

Meetings, updating of manuals etc.

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

No

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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?

Screening are made for "high risk" sectors, also including short term business.

Any Additional Comments

- 57 Please provide any additional comments.