

---

## SURVEY

### on the Environment and Officially Supported Export Credits Projects

---

**REPORTING COUNTRY INFORMATION***USA-Eximbank (USA)-SURVEY-APR-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.

U.S. Ex-Im Bank has adopted policies and requirements set forth in its Environmental Procedures and Guidelines which establish its alignment with the objectives and requirements of the Common Approaches. It is currently in the process of revising its Environmental Procedures and Guidelines to bring them into accord with the 2007 Common Approaches. Please note, however, that all new applications are being processed in accordance with the 2007 Common Approaches.

## USA-Eximbank (USA)-SURVEY-APR-08

### 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 of information required.

All applications for official support in excess of \$10 million must be accompanied by a screening document which requests information as to whether the transaction pertains to a project, and if so, a description of the project and information about its size, location and industrial sector. For applications under \$10 million screening is accomplished by an automated internal documentation system that identifies any underlying project and its location.

#### Responsibilities

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

Any other comments.

The applicant has the direct responsibility for completing the screening document for application in excess of \$10 million. For application where the Bank's level of support is under \$10 million, the environmental specialist uses information provided by the applicant in its application for financial support to screen the application.

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

#### 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.

Ex-Im Bank considers operational links associated with the project based on the level of interdependency of the facility with the project, the timing of its construction and its location relative to the project. Where an associated facility is in an environmentally sensitive area and/or has the potential to cause significant environmental impact, Ex-Im Bank may categorize the application based on the nature of the project and the associated facility taken together.

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.

b) Re-insurance as lead ECA.

Any other comments.

## USA-Eximbank (USA)-SURVEY-APR-08

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]?

The screening document contains questions that help identify transactions involving existing operations.

### **New projects**

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

The screening document that is completed by the applicant requests information on any underlying project.

### **Other exports**

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

Such transactions are classified as category "C"

### **Classification system**

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

No

### **Scope of classification**

13 Do you classify exports of capital goods and services

a) that are to existing operations?

Yes

Please provide details.

All applications that Ex-Im Bank screens are also classified as "A", "B" or "C"

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

Yes

Please provide details.

These transactions are classified as category "C".

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

Ex-Im Bank classifies all transactions below SDR 10 million and for which the repayment term exceeds two years. If no further review is needed because the project is not in or near a sensitive area, it is classified as category "C". If the project is in or near a sensitive area, it would be classified as Category "B" or, rarely, "A" and the appropriate environmental review is conducted.

### **Responsibilities for classification**

15 Who is responsible for the classification of projects?

Environmental Practitioner (always)

## USA-Eximbank (USA)-SURVEY-APR-08

### 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.

All Category A projects are given a full environmental review as prescribed in the Ex-Im Bank Environmental Procedures and Guidelines. All Category B projects are given an environmental review, however, the scope of that review is determined on a case-by-case basis in consideration of the particular environmental issues identified for 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.

If Ex-Im Bank identifies an operational link or facility associated with the project and determines that the identified facility should be included within the scope of the environmental evaluation, it will inform the project as to the identity of the associated facility, the nature of the environmental information about the facility that it requires and the environmental Standards and Guidelines that will be used in evaluating the associated facilities. Operational links or facilities associated with a project are based on the level of interdependency of the facility with the project, the timing of its construction and its location relative to the project. If the facility is in an environmentally sensitive area and/or has the potential to cause significant environmental impact, the application review is based on the nature of the project and the associated facility taken together.

- 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.

May take account of review carried out by lead ECA

Any other comments.

**USA-Eximbank (USA)-SURVEY-APR-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?

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?

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.

For Category B projects, the level of emissions, effluents, wastes and noise are evaluated against host country guidelines and levels set forth in the Environmental Health and Safety Guidelines of the IFC. (Formerly evaluated these pollutants against levels set forth in the PPAH.) When required, may review elements of the project against certain IFC Performance Standards or Operational Policies, but this is seldom required for projects in this category.

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

Case-by-case

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

**USA-Eximbank (USA)-SURVEY-APR-08**

Project description	<a href="#">In most cases</a>	involuntary resettlement	<a href="#">Rarely</a>
Baseline data	<a href="#">Case-by-case</a>	impacts on indigenous peoples	<a href="#">Rarely</a>
Environmental impacts	<a href="#">In most cases</a>	cultural property	<a href="#">Case-by-case</a>
Analysis of alternatives	<a href="#">Rarely</a>		
Environmental Management Plan	<a href="#">Case-by-case</a>		
Consultation	<a href="#">Rarely</a>		

**Existing operations**

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

[Ex-Im Bank's Environmental Procedures require screening and categorization of all applications for which the term of financing is greater than 2 years. For applications related to existing operations, the Ex-Im Bank's revised Procedures direct that available information related to the environmental performance and projected future performance of the project be submitted, including the project's level of adherence to local environmental guidelines.](#)

**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?

[No](#)

**Standards**

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

[Ex-Im Bank requests information on host country standards and then evaluates the level of the project's emissions and effluents against these standards, it also requires information sufficient to demonstrate that host country environmental permits have been issued and depending on the environmental sensitivity of the project, that it is compliant with other policies and legal requirements of the host country.](#)

- 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 \(always\)](#)

c) Regional Development Bank standards.

[Where such institutions are supporting the project \(case-by-case basis\)](#)

Please provide details.

[Ex-Im Bank Environmental Procedures directs that applicable elements of the World Bank Guidelines shall be employed whenever RDB guidelines are insufficient to adequately consider the environmental effects of a project.](#)

**USA-Eximbank (USA)-SURVEY-APR-08**

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

European Community Standards may be used for projects that are within the EU or for projects that are subject to EU guidelines.

- 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

The Pollution Prevention and Abatement Handbook has been replaced by the IFC's Environmental Health and Safety Guidelines.

Public/non-sovereign

The Pollution Prevention and Abatement Handbook has been replaced by the IFC's Environmental Health and Safety Guidelines.

Corporate

The Pollution Prevention and Abatement Handbook has been replaced by the IFC's Environmental Health and Safety Guidelines.

Limited or non-recourse  
project finance  
transaction

The Pollution Prevention and Abatement Handbook has been replaced by the IFC's Environmental Health and Safety Guidelines.

- b) IFC Environmental, Health and Safety Guidelines.

Any other comments.

Sovereign

Public/non-sovereign

Corporate

Limited or non-recourse  
project finance transaction

- 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.

**USA-Eximbank (USA)-SURVEY-APR-08**

- 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.

Applicable elements of European Community Standards may be used for Category B projects that are within the EU or for projects that are subject to EU guidelines.

- 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

Rarely

The Pollution Prevention and Abatement Handbook has been replaced by the IFC's Environmental Health and Safety Guidelines.

Public/non-sovereign

Rarely

The Pollution Prevention and Abatement Handbook has been replaced by the IFC's Environmental Health and Safety Guidelines.

Corporate

Rarely

The Pollution Prevention and Abatement Handbook has been replaced by the IFC's Environmental Health and Safety Guidelines.

Limited or non-recourse  
project finance transaction

Rarely

The Pollution Prevention and Abatement Handbook has been replaced by the IFC's Environmental Health and Safety Guidelines.

- 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

In most cases

---

### USA-Eximbank (USA)-SURVEY-APR-08

---

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

When financing a project with an RDB, would use elements of the World Bank Safeguard Policies or the EHS guidelines, to supplement the RDB guidelines whenever the RDB Guidelines are found to be less stringent than those of the World Bank.

- 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.

For transactions involving nuclear power or nuclear technology, would supplement World Bank safeguard Policies with guidelines and policies of the International Atomic Energy Agency (IAEA)

- 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.

If a project does not meet the applicable environmental guidelines, Ex-Im Bank's Board of Directors will take account of the environmental impacts and other factors relevant to the project in determining whether to provide financial support, to provide financial support conditioned on the implementation of measures to mitigate the project's adverse environmental effects, or to decline financial support for the project.

#### **Site visits**

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

Environmental site visits are conducted during the environmental review as deemed necessary by the Environmental Practitioner to adequately review environmental elements of the project. Decisions as to which projects should be visited are made on a case-by-case basis by the Practitioner, and such visits generally occur only for those Category A projects with complex or unusual environmental issues.

## USA-Eximbank (USA)-SURVEY-APR-08

### 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.

Conditions related to the environment are set forth in the Credit or Guarantee Agreement between Ex-Im Bank and the buyer or project sponsor.

Please provide examples of any environmental covenants used.

Prior to construction of each segment of the pipeline, the project shall submit evidence that all compensation agreements for that segment have been completed, and in the case of imposed easements, that full and fair compensation has been provided in accordance with local law and the provisions of Performance Standard #5 of the IFC.

#### Denying official support

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

Circumstances that would contribute to the denial of support would include instances where the project is not in compliance with applicable host country or international guidelines (including instances of an inadequate EIA), when the resulting impacts are severe or would potentially impact a sensitive site, and/or when the resulting impacts are irreversible.

Please provide any examples of experience.

In the case of gas development and transportation (pipeline) project, support was denied due to the inadequacy of the environmental impact analysis (which lacked adequate site selection studies) and the lack of baseline data related to other environmental and social elements of the project.

#### 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.

All Category A projects require the submission of monitoring reports by the buyer in accordance with an approved monitoring plan. Category B projects may be required to conduct environmental monitoring to address specific concerns, though this is not common. If project support is conditioned on the implementation of environmental mitigation measures, the reports must address the level of implementation of those measures. On a case-by-case basis, depending on the sensitivity of the project, monitoring includes periodic site visits to inspect and assess measures to mitigate adverse impact and evaluate the level of compliance with the project's Environmental Management Plan.

Monitoring frequency/period:

Environmental monitoring Reports are generally required quarterly during construction and semiannually during project operations.

---

## USA-Eximbank (USA)-SURVEY-APR-08

---

Content:

The reports should contain information on ongoing measures taken to mitigate any adverse environmental effects, the status of environmental or social plans, the level of emissions or effluents produced by the project, the level of compliance with provisions of the Environmental Management Plan

Reporting method:

Reports are prepared and submitted to Ex-Im Bank by the buyer or by the environmental consultant to the lenders, and as necessary, reports are prepared by Ex-Im bank environmental practitioner following his/her site visit to evaluate the project's level of compliance with environmental conditions.

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

Other

Please provide details.

Depending on the project, monitoring may be provided by the independent environmental consultant to the lenders, the consultant to the buyer, directly by Ex-Im Bank's environmental practitioner, or a combination of the above.

- 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?

If condition are not being met, Ex-Im Bank initiates actions appropriate to the nature of the non-compliance that strive to assure mitigation of any on-the-ground problems. Ex-Im may opt to withhold disbursements and dividend, accelerate repayment or, as a last resort, to declare the project to be in a state of "default" and take appropriate legal action to bring the project back into compliance.

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

Environmental Practitioner (always)

Please provide any examples of experience.

For several large projects, sponsors were required to undertake "Remedial Action Plans" and/or undertake other actions to 1) bring the project back into compliance with international guidelines or 2) ensure that certain international guidelines would indeed be met through the course of the project's operational life.

---

## USA-Eximbank (USA)-SURVEY-APR-08

---

### **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?

Ex-Im Bank encourages project sponsors to make monitoring reports and related environmental information available to the public on Category "A" projects where ongoing information from monitoring reports is critical to determining the level of compliance with applicable environmental guidelines and standards. Generally these projects will be those located in or near environmentally sensitive areas or in areas that could impact critical habitats.

- 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?

Ex-Im Bank is required to make supplemental environmental reports that it requires to be submitted, including remediation or mitigation plans and environmental monitoring reports available to interested parties. Monitoring reports for Category A projects prepared by the project sponsor, especially in the case of environmentally sensitive projects, will be required to be made available, either by the sponsors or by the Ex-Im Bank itself. Project sponsors are always notified beforehand of this requirement.

## USA-Eximbank (USA)-SURVEY-APR-08

### 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?

Environmental Procedures and Guidelines are published in hard (paper) copy and are also on Ex-Im Bank's web site.

Please provide web address if relevant.

[www.exim.gov](http://www.exim.gov)

#### 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.

When co-insuring/co-financing, Ex-Im Bank's environmental practitioners team exchanges information, identifies issues and formulates recommendations or conditions to support for the mitigation of environmental impacts along with the environmental practitioner's of the partner ECA. However, Ex-Im Bank reaches an independent decision on the overall environmental evaluation of a project.

b) competition.

Information would only rarely be exchanged in cases involving competition, because when conducting the final review of transactions, the element of competition among ECAs and other lenders no longer exists.

#### 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.

For Category A transactions, Ex-Im Bank will list on its web site the project's name, its location, a brief description of the project and information as to the availability of its Environmental Impact Assessment (or comparable environmental documentation). It will either make a copy of the EIA available to interested parties or will direct interested parties to a source where that document can be obtained and reviewed.

b) The form and language of the information released.

The EIA is released in the form to which it was submitted to Ex-Im Bank, either directly by CD-Rom or a hard copy from Ex-Im Bank or through another source that is publically accessible, such as the Project's Website.

including website address, if relevant.

## USA-Eximbank (USA)-SURVEY-APR-08

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

30 days prior to making a final commitment.

- 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, although Ex-Im Bank will not disclose information that is confidential or protected under federal law, or deliberative material generated by the Bank or its consultants.

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

None to date.

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

Project Sponsors (or the owners of the EIA) are required to sign a "release" that legally enables Ex-Im Bank to make the EIA available to interested parties.

### **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.

Ex-Im Bank requires that the complete scope of the EIA that is available to the Ex-Im Bank and other lenders be released. In the case of projects with long construction periods, elements of the EIA such as the Environmental Management Plan, may not be completed at the period of application for financing.

## USA-Eximbank (USA)-SURVEY-APR-08

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

Ex-Im Bank seeks to make copies of the EIA available in the same form and language (English) as we used by Ex-Im Bank in reviewing the environmental aspects of the project.

website address, if relevant.

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

30

- 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).

Only constraint is in the disclosure of business confidential information. In such cases, the business confidential information is removed from the EIA by the project sponsor in order to make the EIA suitable for release by Ex-Im Bank to interested parties.

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

Environmental information prepared by the independent consultant to the lenders is generally deemed to be "deliberative" in nature and not subject to disclosure by Ex-Im Bank.

- 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.

Ex-Post information is made at the end of the year during which support for the projects was authorized. In addition, as project monitoring reports become available, the reports prepared by the Project Sponsor will be made available.

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

The country of the project, the project name & location (including brief project description), the key environmental factors considered in the Bank's environmental review, the project's environmental category, the period of EIA availability (for the case of Cat. A projects) and the date and outcome of Board Action on the final commitment (approval or denial)

- c) Who is responsible for disclosing such information.

ECA

---

**USA-Eximbank (USA)-SURVEY-APR-08**

---

d) The form and language of the information released

This information is released annually in report form and posted on Ex-Im Bank's website.

including website address, if relevant.

[www.exim.gov](http://www.exim.gov)

e) How long the information remains publicly available.

The ex-post information remains for a minimum of five years

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

The method by which Ex-Im Bank will make available ex-post monitoring reports for projects that it previously approved for support is under review. A method is expected to be in place by the end of 2008 to capture those monitoring reports that will become available for projects approved in 2007.

## USA-Eximbank (USA)-SURVEY-APR-08

### 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.

The Environmental Procedures and Guidelines, which draw from the Common Approaches, are officially adopted by Ex-Im Bank's Board of Directors and are applicable to Ex-Im Bank support for exports to proposed physical project transactions. As such, internal documentation to the appropriate transaction decision-makers must provide an assurance that environmental due diligence was conducted as required by the environmental procedures and an assessment of the degree of compliance with applicable environmental guidelines is done. In addition, Ex-Im Bank meets with interested parties to directly register and address any concerns arising from broad environmental policy questions and/or case-specific issues.

#### 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.

Ex-Im Bank periodically revises its Environmental Procedures and Guidelines and during these reviews interested parties within the exporting, banking and NGO community are asked to provide comments on Ex-Im Bank's implementation/experience at the national level.

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

Ex-Im Bank's environmental practitioners participate in the ECG's periodic Practitioner's Meetings and information exchanges as issues arise. Of course, Ex-Im Bank also provides the OECD ECG with the reporting of Category A and B projects as agreed.

#### Revising procedures :

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

April 2008

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

Motivation was to bring the Environmental Procedures into alignment with the Revised Common Approaches.

- 49 Are any modifications foreseen in the near future?

No

## USA-Eximbank (USA)-SURVEY-APR-08

### Resources

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

Acquisition of two to three full time environmental practitioners, and assignment of some elements of environmental review to Ex-Im Bank staff engineers primarily assigned to address issues of project feasibility.

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

3

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

0

### Cost-sharing

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

Ex-Im Bank absorbs the costs of undertaking the environmental review, except that the buyer or project sponsor is assessed the cost of any independent environmental consultants that may be required as well as the cost of travel by Ex-Im Bank staff to conduct environmental site visits and environmental monitoring visits.

### 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.

Ex-Im Bank maintains a file of all of the evaluations that it has undertaken for projects since the inception of its Environmental Procedures and Guidelines in 1995. These facilitate and enhance the review of projects and expansion projects that may have been the subject of environmental reviews in the past.

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

An official "Environmental Evaluation" is conducted for each final application undergoing environmental review by the environmental specialist. This evaluation which contains information on any environmental issues, required environmental conditions or information relative to required environmental monitoring, used to craft credit agreement environmental terms, and is filed with the project for future reference.

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

No

---

## USA-Eximbank (USA)-SURVEY-APR-08

---

### 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?

Ex-Im Bank does not conduct any environmental screening or review of transactions having a repayment term of less than two years.

#### Any Additional Comments

- 57 Please provide any additional comments.