

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

GBR-ECGD-SURVEY-JUL-10

Reporting Country	<input type="text" value="United Kingdom"/>	Reporting Institution	<input type="text" value="ECGD"/>
Submission Date	<input type="text" value="29 July 2010"/>	Version number	<input type="text" value="1"/>

**I GENERAL PRINCIPLES****Objectives**

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

ECGD's policies and practices are described in its "Mission and Principles" (available at: <http://www.ecgd.gov.uk/about-us/mission-and-principles>) and its "Guidance to applicants: processes and factors in ECGD consideration of applications" (available at: <http://www.ecgd.gov.uk/assets/bispartners/ecgd/files/prods-servs/guidance-on-processes-and-factors.pdf>). Reference should be made to these documents for a more complete description of ECGD's policies and practices relating to the environmental impacts of projects for which its support is requested.

**GBR-ECGD-SURVEY-JUL-10****II SCREENING AND CLASSIFICATION OF PROJECTS****Exemptions**

GBR-ECGD-SURVEY-JUL-10

2 Are all applications screened? 

Please provide details of any exemptions from screening, including the value of any threshold used.

i) value of any threshold used:  currency:   
Please specify currency and exchange rate to Euros

ii) details of any exemptions from screening:

ECGD applies the SDR10 million (equivalent to Euros 11,863,061 on 13 July 2010) threshold described in paragraph 5.2 of the 2007 Common Approaches. Aerospace and defence exports are subject to separate screening arrangements. All new aircraft and aero engines supported by ECGD must meet EU, US and International Civil Aviation Organisation environmental and noise standards. Defence exports are subject to the export licensing procedure operated by the Department for Business, Innovation and Skills, the Foreign and Commonwealth Office, the Ministry of Defence and, where relevant, the Department for International Development.

**Information requirements**3 What information is required for the screening process? 

Please provide details of information required.

Applicants must complete the impact questions contained within ECGD's standard application forms in respect of all civil, non-aerospace exports. These request information on all the likely direct impacts of the goods and services being exported, the location of the project and a description of the current and future activities at the project site.

**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?

**Timing**

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

Following receipt of a completed schedule to the application form by the Environmental Practitioners in ECGD's Environmental Advisory Unit.

## GBR-ECGD-SURVEY-JUL-10

### Scope and criteria of screening

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

The application form asks the applicant to describe the overall project, including elements of non-UK contractual responsibility, and the activities carried out at the location where the goods will be used and/or the services will be performed for both -

- current activities, and
- proposed future activities, if different from the current activities.

This information assists ECGD in determining what additional information, if any, to request on operational links with 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).

Would always conduct own screening

Any other comments.

For co-insurance/co-finance situations, while ECGD conducts its own screening, it will make use of information obtained or held by those other ECAs or IFIs involved and share its information with the other ECAs or IFIs involved.

b) Re-insurance as lead ECA.

Would always conduct own screening

Any other comments.

Where ECGD is the lead ECA, ECGD usually provides environmental information to other ECAs providing reinsurance.

c) Re-insurance as re-insurer.

May take account of screening by lead ECA

Any other comments.

Where ECGD is the reinsurer, the initial environmental information is usually provided by the lead ECA. ECGD may ask the lead ECA to obtain additional environmental information from its applicant.

### 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 application form asks the applicant to describe the overall project, including elements of non-UK contractual responsibility, and the activities carried out at the location where the goods will be used and/or the services will be performed for both -

- current activities, and
- proposed future activities, if different from the current activities.

### New projects

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

Please see response to question 9.

## GBR-ECGD-SURVEY-JUL-10

### Other exports

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

ECGD's screening process, in accordance with paragraphs 4 and 5 of the 2007 Common Approaches, identifies whether exports are to: (i) a new commercial, industrial or infrastructure undertaking at an identified location; (ii) identifiable existing operations that are undergoing no material change in output or function; or (iii) neither to existing operations nor to new projects.

### 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?

No

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

No

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

In accordance with paragraph 5.2 of the 2007 Common Approaches, ECGD classifies projects in respect of which its share is below SDR 10 million when the project is in or near a sensitive area.

### Responsibilities for classification

- 15 Who is responsible for the classification of projects?

Environmental Practitioner (always)

## GBR-ECGD-SURVEY-JUL-10

### III ENVIRONMENTAL REVIEW

#### Information requirements

GBR-ECGD-SURVEY-JUL-10

- 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.

ECGD's "Guidance to applicants: processes and factors in ECGD consideration of applications" (available at: <http://www.ecgd.gov.uk/assets/bispartners/ecgd/files/prods-servs/guidance-on-processes-and-factors.pdf>) and the questions in its application forms describe ECGD's practices relating to the environmental impacts of projects for which its support is requested.

#### 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.

Please see response to question 7.

- 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.

May take account of review carried out by other ECAs, IFIs or Development Agency

Any other comments.

ECGD usually works together with and shares environmental information with such institutions, but ECGD would make its own decision on its support.

- b) Re-insurance as lead ECA.

Would always conduct own screening

Any other comments.

ECGD usually provides environmental information to other ECAs providing reinsurance, but ECGD would make its own decision on its support.

## GBR-ECGD-SURVEY-JUL-10

- c) Re-insurance as re-insurer.

May take account of review carried out by lead ECA

Any other comments.

ECGD usually seeks initial environmental information from the lead ECA, and may seek further information from the UK exporter or project developer, as required. But ECGD would make its own decision on its support.

#### 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?

Yes

Please provide details, including any examples of experience.

Where an EIA does not exist, ECGD still requires the information that would normally be contained in a formal EIA, Social Impact Assessment and/or Resettlement Action Plan to be made available before it can complete its review.

- 22 a) Who is responsible for

- i) Commissioning an EIA?

Project Sponsor (in most cases)

Any other comments.

- ii) Carrying out an EIA?

Other

Please provide details.

ECGD expects the Project Sponsor to retain an experienced consultant to carry out the EIA.

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

Applicant (in most cases)

Any other comments.

The UK exporter would normally obtain a copy of the EIA report from the project developer/sponsor.

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

Environmental Practitioner (always)

## GBR-ECGD-SURVEY-JUL-10

### 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 cases ECGD normally requires the completion of an Environmental, Social and Human Rights Impact Questionnaire which requests a copy of any existing environmental or social impact assessment report on the project and other information, including that listed in paragraph 8 (tired 1) below. A copy of the Environmental impact questionnaire is available at: <http://www.ecgd.gov.uk/products-and-services/application-forms/buyer-credit-facility>.

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  Case-by-case

Project description  Case-by-case

Baseline data  Case-by-case

Environmental impacts  Case-by-case

Analysis of alternatives  Case-by-case

Environmental Management Plan  Case-by-case

Consultation  Case-by-case

#### Paragraph 8 (tired 1):

significant air emissions, effluents, waste or noise  Case-by-case

significant use of natural resources  Case-by-case

involuntary resettlement  Case-by-case

impacts on indigenous peoples  Case-by-case

cultural property  Case-by-case

### Existing operations

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

The review of the environmental risks associated with existing operations is performed by ECGD on a case-by-case basis.

### 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?

Yes

Please provide details.

Where there is no identifiable existing operation or project, ECGD considers only the potential impacts of the exported goods/services.

## GBR-ECGD-SURVEY-JUL-10

### Standards

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

For Category A projects, ECGD expects this to be addressed by the EIA. For Category B projects, ECGD's Environmental, Social and Human Rights Impact Questionnaire asks for information on whether the project is designed to meet recognised environmental standards (e.g. host country, UK/EU, World Bank, IFC, other standards, or none).

- 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.

ECGD would accept the use the IFC Performance Standards rather than the World Bank's Safeguard Policies if requested by the Project Sponsor.

- c) Regional Development Bank standards.

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

Please provide details.

ECGD would accept the use the relevant Regional Development Bank standards rather than the World Bank's Safeguard Policies if requested by the Project Sponsor and if support was being considered by the Regional Development Bank.

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

ECGD uses the World Health Organisation's air quality standards for situations not covered by the WB/IFC EHS 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  Case-by-case

Public/non-sovereign  Case-by-case

## GBR-ECGD-SURVEY-JUL-10

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  

- 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.

## GBR-ECGD-SURVEY-JUL-10

- 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  

## 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.

## GBR-ECGD-SURVEY-JUL-10

- 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.

Other international standards, such as those of the major regional development banks (the Asian Development Bank, the African Development Bank, the Inter-American Development Bank and the European Bank for Reconstruction and Development) for projects in their areas of operation, the World Health Organisation and/or the European Union, may be appropriate alternatives or supplements.

- 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.

Where an assessment of environmental impacts on a project indicates, at first instance, that the project does not meet the benchmark standards, ECGD will usually consult with the applicant and project sponsor in order to establish whether the project may be improved so that it does meet those standards.

### Site visits

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

ECGD usually carries out site visits on Category A cases.

## GBR-ECGD-SURVEY-JUL-10

### IV EVALUATION, DECISION AND MONITORING

#### Conditions to official support

GBR-ECGD-SURVEY-JUL-10

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

Where the exporter or project developer has agreed to meet certain standards, this will usually be included through covenants in the financing arrangements. A system for monitoring and reporting on compliance with such covenants may also be required.

Please provide examples of any environmental covenants used.

#### Denying official support

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

Where an assessment of ESHR impacts on a project indicates, at first instance, that the project does not meet those standards, ECGD will usually consult with the applicant and project sponsor in order to establish whether the project may be improved so that it does meet those standards. ECGD may reject, at any juncture, support for an export to a project which is deficient in these respects.

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.

Please see response to question 35. The system for monitoring projects is determined on a case by case basis.

Monitoring frequency/period:

GBR-ECGD-SURVEY-JUL-10

Content:

Reporting method:

- 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?

There are various mechanisms for enforcement including: the obligation to inform ECGD within an agreed period of any event that constitutes non-compliance; the presentation of an agreed corrective action plan (CAP) within an agreed period; a continuing obligation to report on the progress of a CAP, and the ability to call a default under the financing arrangements where a CAP is not implemented or does not bring the project back into compliance. Failure to achieve any of the actions within the agreed periods may also constitute a default under the financing arrangements. ECGD is responsible for deciding the action it deems appropriate.

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

Environmental Practitioner (always)

Please provide any examples of experience.

GBR-ECGD-SURVEY-JUL-10

**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?

ECGD does not require *ex post* monitoring reports to be made public, although it encourages project developers to do so.

- 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?

ECGD does not require *ex post* monitoring reports to be made public, although it encourages project developers to do so.

## GBR-ECGD-SURVEY-JUL-10

### V EXCHANGE AND DISCLOSURE OF INFORMATION

#### Environmental procedural guidance

GBR-ECGD-SURVEY-JUL-10

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

Yes

Where can they be found?

ECGD's policies and practices are described in its "Mission and Principles" and its "Guidance to applicants: processes and factors in ECGD consideration of applications".

Please provide web address if relevant.

ECGD's "Mission and Principles" is available at: <http://www.ecgd.gov.uk/about-us/mission-and-principles>, and its "Guidance to applicants: processes and factors in ECGD consideration of applications" is available at: <http://www.ecgd.gov.uk/assets/bispartners/ecgd/files/prods-servs/guidance-on-processes-and-factors.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.

Please see response to question 20.

- b) competition.

Please see response to question 20.

#### 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 cases, after obtaining the relevant consents, ECGD publishes on its website a brief account of the project (project name, location, a brief description and the source of environmental information).

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

Please see response to 43(a).

including website address, if relevant.

<http://www.ecgd.gov.uk/publications/operational-data/cat-a--potential-impact-cases>

## GBR-ECGD-SURVEY-JUL-10

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

Prior disclosure of a project will normally be made following a formal application for ECGD cover. In accordance with the 2007 Common Approaches, ECGD will seek to publish information at least 30 days before any decision on cover is taken. In order to avoid jeopardising competitive positions, disclosure is subject to customer consent.

- 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).

Usually there are no legal constraints on such *ex ante* disclosure, although customer consent is always sought.

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

Please see response to 43(c).

- 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, including:

- a) Responsibility for making such information publicly available.

Project Sponsor

- 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;

ECGD expects the project developer to make such information available to the public through posting on the project website and/or provision of hard copies in project information centres or local libraries.

- ii) how this is monitored;

ECGD monitors information disclosure by project sponsors through spot checks as part of its due diligence.

GBR-ECGD-SURVEY-JUL-10

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

If such information is not made publicly available, ECGD may discontinue its consideration of the application for support.

iv) please provide any examples of experience.

The Nigeria LNG project – see [www.nlng.com](http://www.nlng.com)

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

The 2007 Common Approaches recommends that, for Category A projects, ECAs should “seek to make environmental impact information publicly available (e.g. EIAs, summary thereof) at least 30 calendar days before a final commitment to grant official support”. ECGD expects project sponsors to ensure that this information is published at the appropriate stage in the development of the project.

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

ECGD would usually provide a link from its website (list of Category A potential impact cases) to the project developer’s web site where such information is available.

website address, if relevant.

<http://www.ecgd.gov.uk/publications/operational-data/cat-a--potential-impact-cases>

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

At least 30 calendar days before a final 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).

Usually ECGD is not able legally to require the project developer to provide disclosure, although the latter’s failure to provide such disclosure may affect ECGD’s further consideration of the application for support.

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

ECGD has not encountered any such circumstances to date.

GBR-ECGD-SURVEY-JUL-10

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.

Annually.

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

In its Annual Review and Resource Accounts, ECGD provides a List of Guarantees and Insurance Policies Issued. Information is provided on the market, exporter, buyer, project and case impact category.

c) Who is responsible for disclosing such information.

ECA

d) The form and language of the information released

ECGD’s recent Annual Reviews and Resource Accounts are available on ECGD’s website.

including website address, if relevant.

<http://www.ecgd.gov.uk/publications/reports/list-quar-policies-issued>

e) How long the information remains publicly available.

ECGD’s Annual Reviews and Resource Accounts are usually available on ECGD’s website for several years.

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

## GBR-ECGD-SURVEY-JUL-10

## VI REPORTING AND MONITORING OF THE RECOMMENDATION

Accountability of your guidelines

GBR-ECGD-SURVEY-JUL-10

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

Board and senior management monitoring, National Audit Office and Parliamentary scrutiny, peer review within the Environmental Advisory Unit and overview by the Export Guarantees Advisory Council, an independent statutory body appointed by Ministers, whose members have relevant expertise.

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 implementation of the Common Approaches by the Environmental Practitioners in ECGD's Environmental Advisory Unit is monitored annually by ECGD's Board and senior management and reviewed by the Export Guarantees Advisory Council.

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

ECGD shares experiences with other Members through discussions amongst the Environment Practitioners.

Revising procedures:

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

April 2010

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

ECGD's environmental procedures were reviewed in April 2010 as a result of a public consultation on ECGD's Business Principles (for details please see <http://www.ecgd.gov.uk/Consultations/revisions-business-principles?cat=closedwithresponse>).

- 49 Are any modifications foreseen in the near future?

Yes

Following the completion of the 2010 review of the 2007 Common Approaches.

For what  
reason?

When ? (mm/yy)

April 2011

## GBR-ECGD-SURVEY-JUL-10

Resources

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

ECGD has five professional Environmental Practitioners. It has access to environmental specialists through call-off contracts, who are used during periods of high workload and/or when specialist expertise is required.

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

5

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

Cost-sharing

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

On large project finance cases the project developer usually pays for the independent environmental consultant. The project developer may also pay for the costs relating to site visits before completion of the financing agreement.  
Cost sharing after the completion of the financing agreement will depend on its terms.

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.

Experiences gained on cases and lessons learned are shared internally within ECGD.

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

The Environmental Advisory Unit provides awareness training for ECGD staff. Underwriters are involved in environmental discussions, where practicable.

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

Yes

Please provide  
details.

Please see response to question 45(b).

---

**GBR-ECGD-SURVEY-JUL-10**

---

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

GBR-ECGD-SURVEY-JUL-10

- 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?

ECGD does not consider environmental issues relating to exports of capital goods and services and the locations to which these are destined for officially supported export credits with a repayment term of less than two years.

**Any Additional Comments**

- 57 Please provide any additional comments.

None.