

SURVEY

on the Environment and Officially Supported Export Credits Projects

REPORTING COUNTRY INFORMATION*BEL-ONDD-SURVEY-MAR-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.

Documentation

- document describing the environmental policy of ONDD based on the Common approaches available on the website of the company;
- document describing the internal environmental procedure containing the different steps of the environmental and social evaluation of the projects and the roles and responsibilities of the different people involved in the evaluation (two different departments of ONDD: Strategy and Business Development department and Underwriting department, external consultants) reflecting the Common approaches;
- document describing the requirements and the scope of work for external consultants ;
- document describing the main environmental impacts of the activities of ONDD's clients (dredging works for example);
- insurance application forms containing specific questions about environment.

Practices

- regular internal meetings over the policy and procedures described above;
- regular meetings with ONDD clients to explain the content of the Common approaches;
- internal meetings to give feed back over the OECD practitioners meetings;
- collaboration with external consultants for A and B projects;
- continuous exchange of information (clients, consultants, other ECA's, financial institutions, national authorities)
- monitoring of the evolution of international and European standards, national legislation and best practices from other ECA's

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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.

Answers related to environmental and social issues in the ONDD application form, EIA and EMP if available, any available documentation about the project.

Responsibilities

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

Applicant (in most cases)

Any other comments.

The information provided by the client is checked by ONDD (sensitive sector or location, NGO's campaigns, information from national authorities, ...).

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

Underwriter and Environmental Practitioner (always jointly)

Timing

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

The screening process starts when an application form for a transaction is sent to ONDD.

Scope and criteria of screening

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

Operational links are always part of the screening process for A projects, and for some B projects (case-by-case approach).

- 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).

May take account of screening by other ECAs or IFIs

Any other comments.

ONDD might also rely on screening by other ECA's or IFIs

- 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 rely on screening by lead ECA

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]?

Up to now, we haven't had a specific procedure to identify exports of capital goods and services to existing operations, we do the screening and the classification the same way we do for new projects.

New projects

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

See answer 9: we don't have a specific procedure to identify exports of capital goods and services to projects.

Other exports

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

We screen all applications to be sure that the export of capital goods and services cannot be related to a project or an existing operation. Any applications that are identified as exports to neither projects nor existing operations are not subject to any further screening or review.

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.

We classify like any other export to projects

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?

We classify all projects even when our share is below SDR 10 million.

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.

Our procedures prescribe the type of information necessary for the review process: EIA and EMP are always necessary for A projects, EIA and EMP are also necessary in some B projects.

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)

External consultants are always appointed for A projects and for some B projects on a case-by-case basis. An assessment report of the project (with recommendations) is provided by the consultants.

Scope and criteria

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

Operational links are considered during the review process with the same methodology as for the project itself. We have had the following case: the development of a harbour - that could be covered by ONDD - connected to an existing mine via the development of an existing railway. The development of the railway has been included in the review process.

- 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 rely on review carried out by other ECAs, IFIs or Development

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 rely on review carried out by lead ECA

Any other comments.

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?

Applicant (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)

The environmental practitioner is the main responsible for reviewing an EIA report but because ONDD doesn't have an internal environmental expert (the environmental practitioner has the function of an advisor and is the reference person in relation to any sustainable development topic), external consultants are key actors in the reviewing process. The steps are the following: 1) project screening by ONDD and by external consultants (selection criteria for the choice of consultants: sector, country, relevant expertise), 2) project assessment report delivered by the consultants, 3) conclusions and recommendations discussed internally (environmental practitioner and underwriters), 4) final conclusions and recommendations discussed with ONDD client (environmental practitioner and underwriters and external consultants. When the EIA does not comply with all the requirements of the Recommendation or is not up-to-date, we then ask the consultants to get more information (site visits, meetings, Internet, ..) in order to be able to assess the potential impacts of the project, focusing on the activities of ONDD's client.

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- 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.

EIA and EMP are the reference documents as they are for A projects. If there is no EIA, we then ask for documentation about the key environmental and social factors. If the share is under 10 mio EUR and if the sector and the location are not sensitive, we focus more on the potential impacts of the activities of our client.

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	<input type="text" value="In most cases"/>
Policy, legal and administrative framework	<input type="text" value="In most cases"/>
Project description	<input type="text" value="In most cases"/>
Baseline data	<input type="text" value="In most cases"/>
Environmental impacts	<input type="text" value="In most cases"/>
Analysis of alternatives	<input type="text" value="In most cases"/>
Environmental Management Plan	<input type="text" value="In most cases"/>
Consultation	<input type="text" value="In most cases"/>

Paragraph 8 (tired 1):

significant air emissions, effluents, waste or noise	<input type="text" value="In most cases"/>
significant use of natural resources	<input type="text" value="In most cases"/>
involuntary resettlement	<input type="text" value="In most cases"/>
impacts on indigenous peoples	<input type="text" value="In most cases"/>
cultural property	<input type="text" value="In most cases"/>

Existing operations

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

The reviewing process for risks associated with existing operations is the same as for new projects.

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

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

[We ask for environmental permit/licence and we check the results in the documentation \(EIA, ...\)](#)

- 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.

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

[EU standards](#)

- 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 [Case-by-case](#)

Limited or non-recourse
project finance transaction [Rarely](#)

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b) IFC Environmental, Health and Safety Guidelines.

Any other comments.

Sovereign In most casesPublic/non-sovereign In most casesCorporate In most casesLimited 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. 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.

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

 EU 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 In most casesPublic/non-sovereign In most casesCorporate Case-by-caseLimited or non-recourse
project finance transaction Rarely

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b) IFC Environmental, Health and Safety Guidelines.

Any other comments.

Sovereign Public/non-sovereign Corporate Limited or non-recourse
project finance transaction

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

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

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

We have had a case where a category A project did not entirely meet the international standards against which it was benchmarked because the EIA available for this project was not up to date and some baseline data were missing; ONDD was not able to evaluate the potential impacts of the entire project. As a consequence, ONDD decided to appoint an external consultant to get updated and additional information about the project as a whole and specifically about the works that would be supported by ONDD: a site visit and exchange of information were also organised and the recommendations made by an international NGO on this project taken into account by the consultants. The result was a report containing conclusions and recommendations by the consultants, albeit focused principally on the works to be supported by ONDD. The recommendations made by the consultants were in line with the Safeguard Policies and ONDD's support was conditional on compliance with these recommendations. Another case was that not all elements of the total project met the relevant aspects of the international standards against which the project was benchmarked; however, with regard to the works supported by ONDD, there is a guarantee that these international standards will be applied. In addition, the EMP contained mitigation measures that were comparable to other projects that meet international standards. On this basis, ONDD agreed to support this project.

Site visits

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

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IV EVALUATION, DECISION AND MONITORING

Conditions to official support

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

We have 2 phases in our commitment: the first one is the issue of a cover and the second one is the issue of a policy. Environmental conditions can be incorporated as well in a cover as in the insurance policy. Environmental conditions can be added for A and B projects.

Please provide examples of any environmental covenants used.

A condition in the cover can be the delivering of a EIA that complies with requirements in line with the Common approaches. A condition in the policy can be the compliance with the recommendations that are the result of the evaluation/review process, the compliance with the mitigation measures described in the EIA/EMP, the compliance with a monitoring program.

Denying official support

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

If potential impacts described in the documentation can't be handled by mitigation measures; if documentation available doesn't allow us to review the potential impacts of the project; if the documentaion available indicates that the project doesn't comply with international standards; if the reputational risk is high.

Please provide any examples of experience.

Reputational risk: Sakhalin II project; EIA not up-to-date and baseline data missing: project in India, no EIA available in Lybia.

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.

Monitoring procedure consists of regular sending of monitoring reports (regularity depending on the projects). The monitoring reports are from ONDD's clients (it can be a local branch of our client) or from insured's clients/buyer, or from independent consultants. We ask for monitoring results focused on the activities of our client. The following of monitoring programs can be a condition of our support. Monitoring reports are screened by ONDD's external consultants. When monitoring results are incomplete and therefore do not ensure compliance with ONND's environmental conditions, we ask the client to provide us as soon as possible additional data, with the help of external consultants. A site visit can be organised. Regular meetings take place with ONDD's clients and our external consultants in order to ensure compliance with ONDD's environmental conditions. Up to now, we haven't had to cancel our cover.

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Monitoring frequency/period:

Depending on projects: monthly or quarterly.

Content:

The monitoring is generally based on the EMP which describes the roles and responsibilities of every contributor to the project. For example for dredging activities: the objectives of the environmental monitoring plans are to examine the influence of the reclamation and dredging activities upon the water-quality and composition through field measurements and daily monitoring. Through the environmental monitoring program the compliance with the water quality thresholds are monitored as formulated in the EIA. The monitoring is carried out with environmental monitoring vessels. The monitoring is carried out at different specified stations. Fixed monitoring is also used to comply with environmental regulations. A statistical summary of daily monitoring for temperature and turbidity can be found in the reports. The statistical summary of the turbidity measurements shows if the average and standard deviations stay below the 95% percentile of the baseline conditions. Marine mammal observations: vigilance and monitoring of cetacean movements are coordinated by the environmental surveyor. Notices are placed on ships, and all sightings are reported to the environmental surveyor. Part of the monitoring reports can be based on the ISO 14001 requirements and on internal procedures and documents of ONDD's clients.

Reporting method:

above-mentioned

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

ECA Consultant

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

Environmental Practitioner (always)

With the help of external consultants

Non-compliance measures

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

Meeting with ONDD's client to try to solve the problem and threat to call an event of default

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

Underwriter and Environmental Practitioner (always jointly)

Please provide any examples of experience.

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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?

For A projects

- 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?

For A projects

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V EXCHANGE AND DISCLOSURE OF INFORMATION**Environmental procedural guidance**

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

[Yes](#)

Where can they be
found?

[ONDD's website](#)

Please provide
web address if
relevant.

http://www.ondd.be/webondd/Website.nsf/weben/Who+are+we_Ethics?OpenDocument

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.

[No specific procedure](#)

b) competition.

[No specific procedure](#)

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.

[Project name, country, information disclosed, publishing date, comment due by..., EIA hyperlink](#)

b) The form and language of the information released.

[Dutch French and English](#)

including website address, if relevant.

http://www.ondd.be/webondd/Website.nsf/weben/Who+are+we_Ethics?OpenDocument#A1

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

[30 days](#)

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](#)

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

We have had only one case up to now: it was related to a project in a sensitive country and in a sensitive sector. The buyer didn't want to make the information publicly available because of security reasons (related to terrorism threats).

- 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.

EIA or any other E&S documents.

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

The information is generally available in English but we have had the case of EIA in Spanish.

website address, if relevant.

http://www.ondd.be/webondd/Website.nsf/weben/Who+are+we_Ethics?OpenDocument#A1

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

30 days

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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.

If we haven't the insured authorisation to disclose information.

- 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.

When the policy is issued.

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

Exporter's name, brief description of the project, country, contracting party, amount category, environmental classification, date, EIA hyperlink

- c) Who is responsible for disclosing such information.

ECA

- d) The form and language of the information released

Dutch, French and English

including website address, if relevant.

http://www.ondd.be/webondd/Website.nsf/weben/Who+are+we_Ethics?OpenDocument#A1

- e) How long the information remains publicly available.

There is no rule but generally for one year

- 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.

There is an internal compliance officer in charge of compliance with internal procedures, and also an internal audit team.

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.

No specific procedures and practices are currently in place; however, we periodically share experience of implementing the Common Approaches with our Guardian Authority.

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

Case-by-case approach, based on an exchange of e-mails or phone calls.

Revising procedures :

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

February 2008

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

After the recent update of our environmental procedure related to the revision of the Common approaches, the motivation for the last update was to have a more detailed procedure on specific topics (monitoring process, biodiversity and climate change issues, sharing of tasks and responsibilities between underwriters and environmental practitioner, how to word the environmental conditions).

- 49 Are any modifications foreseen in the near future?

Yes

For what reason?

To provide more detailed information on some impacts, update foreseen before the end of 2008

When ? (mm/yy)

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Resources

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

An annual budget specific for external environmental and social consultancy

- 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.

4

Cost-sharing

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

Costs are taken on by ONDD

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.

No specific procedures and practices are currently in place: information currently shared between Practitioner and external consultants, including by specific internal database.

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

Specific internal database

- 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?

The same way as for ONDD export credits with a repayment over 2 years

Any Additional Comments

- 57 Please provide any additional comments.