

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

NLD-Atradius-SURVEY-JUL-10

Reporting Country	Netherlands	Reporting Institution	Atradius
Submission Date	21 July 2010	Version number	3

I GENERAL PRINCIPLES**Objectives**

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

As of 1 September 2009 a revised policy on the review of the environmental and social aspects according to the 2007 Common Approaches and Dutch CSR policy will become effective. At the operational level Atradius DSB has developed a procedure as part of her internal Handbook in which the objectives of the Dutch policy are addressed. All insurance applications for export transactions and investments are screened. Based on the screening, applications for transactions or projects over 10 million euro are classified. If it is clear that a transaction /project under the 10 million euro threshold will result in substantial damage, classification and review will follow. On the Atradius DSB webpage a summary is given of the review proces and the review process is explained in more detail in the brochure: "Atradius Dutch State Business and CSR".

NLD-Atradius-SURVEY-JUL-10**II SCREENING AND CLASSIFICATION OF PROJECTS****Exemptions**

2 Are all applications screened? Yes

Information requirements

3 What information is required for the screening process?

Application form

Please provide details of information required.

In the CSR section of the application form information is required on: use of location, sector and physical location, availability EIA, SIA and EMP, resettlement, labour norms, application of standards, management systems and best available technology, applicable legislation, competent authority and required permits. Furthermore, 3 questions are included on the supply chain related to the capital goods or services.

Responsibilities

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

Applicant (in most cases)

Any other comments.

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

Environmental Practitioner (always)

Timing

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

The screening commences in the underwriting phase on receipt of the application form.

Scope and criteria of screening

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

The following approach is applied to define the project: On the basis of the criteria function, location and timing the project will be defined as well as operations that may not have a direct operational link. These operations will be placed in the project surroundings and may be marginally reviewed (see Q12). With this approach operational links with associated operations are considered, where appropriate.

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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.

May take account of screening by other ECAs or IFIs.

b) Re-insurance as lead ECA.

Would always conduct own screening

Any other comments.

c) Re-insurance as re-insurer.

Would always conduct own screening

Any other comments.

May take account of screening by other ECAs or IFIs.

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]?

In the applicaiton form information is requested to indentify exports of capital goods and services to existing operations . Where required additional clarification will be sought from the exporter.
Furthermore Common Approaches recommendations have been integrated in our procedures.

New projects

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

In the applicaiton form information is requested to indentify exports of capital goods and services to projects . Where required additional clarification will be sought from the exporter.
Furthermore Common Approaches recommendations have been integrated in our procedures.

Other exports

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

In the application form information is requested to indentify exports of capital goods and services regardless of whether these are delivered to existing operations or projects. For example we will review movable assets if the contract price exceeds 10 million Euro or below 10 million Euro if it is a delivery to a sensitive sector and/or sensitive area.

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Classification system

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

Yes

Please provide details.

In addition to the A, B, and C classification, Atradius DSB applies the label M for exisiting operations that are undergoing no material change in output or function, operations in the project surroundings and refinancing applications. M stands for a marginal review focussing on the track record of the project sponsor in environmental and social aspects and compliance with applicable local standards for the operations.

Scope of classification

13 Do you classify exports of capital goods and services

a) that are to existing operations?

Yes

Please provide details.

As part of the decision process to perform a review of the environmental and social impacts of exports of capital goods and services to existing operations, the application will be screened and classified taking into account the industry sector, location and whether the operation undergoes a material change in output or function.

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

Yes

Please provide details.

As part of the decision process to perform a review of the environmental and social impacts of exports of capital goods and services to neither an existing operation or project, the application will be screened and classified taking into account the industry sector, location and other relevant information of the transaction.

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

If it is clear that a transaction /project under the 10 million euro threshold involves a sensitive sector and/or area, the application will also be reviewed for environmental and social impacts.

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.

Category A: environmental impact assessment (EIA) or equivalent information. Category B: an environmental impact statement (EIS) with a commentary. Category C: Completing the CSR section in the application form and if needed additional questions. M: marginal review of the Project Sponsor's track record on environmental and social aspects and compliance with local standards

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.

The Common Approaches have been adopted for the review process and classified projects are benchmarked against the IFC performance standards or other relevant standards. Operational links within the project are considered where the resource utilised by the project is ecologically sensitive or in cases where low labour cost is a factor in the competitiveness in the item supplied.

- 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.

- b) Re-insurance as lead ECA.

Would always conduct own screening

Any other comments.

- c) Re-insurance as re-insurer.

Would always conduct own review

Any other comments.

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

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Category A projects

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

Yes

Please provide details, including any examples of experience.

In exceptional cases, an A-project review could be done in the absence of an EIA. In cooperation with the applicant equivalent information will be sought to meet the review criteria. The review will most likely include a site visit.

- 22 a) Who is responsible for

- i) Commissioning an EIA?

Project Sponsor (in most cases)

Any other comments.

- ii) Carrying out an EIA?

Independent Consultant (in most cases)

Any other comments.

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

Applicant (in most cases)

Any other comments.

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

Environmental Practitioner (always)

Category B projects

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

In general the review of Category B project requires and EIS and review aspects include the examination of potential negative and positive environmental impacts as well as measures to prevent, minimise, mitigate or compensate adverse impacts and improve environmental performance.

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

Annex II:Executive Summary Policy, legal and administrative framework Project description Baseline data Environmental impacts Analysis of alternatives Environmental Management Plan Consultation Paragraph 8 (tired 1):significant air emissions, effluents, waste or noise significant use of natural resources involuntary resettlement impacts on indigenous peoples cultural property Existing operations

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

For existing operations the same review process applies if they are undergoing a material change in output or function. If not the existing operations may be reviewed for environmental and social risks applying the marginal review.

Other exports

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

Please provide details.

These reviews are performed for the environmental and social risks associated with the transaction and where possible will consider the risks associated with the delivery location.

Standards

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

Applicant has to provide information on applicable standards and compliance (e.g. copies of permits, licences, approvals). Where needed this will be supplemented by a search in the public domain and by enlisting the support of the Dutch embassy in 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.

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

- c) Regional Development Bank standards.

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

The Pollution Prevention and Abatement Handbook is outdated and is no longer used.

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

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

a) World Bank Safeguard Policies.

b) International Finance Corporation (IFC) Performance Standards.

c) Regional Development Bank standards.

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

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Limited or non-recourse
project finance transaction

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

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

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

Site visits

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

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IV EVALUATION, DECISION AND MONITORING

Conditions to official support

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

In principle, Atradius DSB does not apply environmental covenants. If the applicant does not inform Atradius DSB fully on the environmental and social impacts associated with the transaction/project or immediately notifies Atradius DSB in writing of facts and/or circumstances which become known to them before the policy is issued, and which could be significant for the assessment, this may result in a laps of entitlement to indemnity or reclamation of compensation paid.

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.

Support will be denied if the key-question: " Is the transaction or project that the export contributes to, for the relevant environmental and social aspects on balance acceptable? Furthermore support will also be denied if the required information for a proper review cannot be provided by the applicant.

Please provide any examples of experience.

In 2006, Atradius DSB denied support to a transaction involving the dredging of a waterway in India on account of unacceptable environmental impacts. In 2007, Atradius DSB denied support to a transaction which delivered to an oil and gas project in the Russian Federation for which the EIA could be not be supplied. In 2010, support was denied in relation to a harbour development project in India, as the EIA was considered business confidential and therefore not provided.

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.

In case of Project Finance, monitoring could entail auditing by an independent consultant on basis of the ESMP.

Monitoring frequency/period:

Quaterly/semi-annully dependend on the project phase

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Content:

ESMP requirements.

Reporting method:

Audit report

- 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)

Non-compliance measures

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

Period of remediation and in case of non-compliance during this period an event of default may be called.

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

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

Please provide details.

Also in cooperation with the Claims team.

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?

No requirement under the policy.

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

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V EXCHANGE AND DISCLOSURE OF INFORMATION

Environmental procedural guidance

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

Yes

Where can they be found?

Atradius DSB webpage and brochure. Please note the Dutch policy is only available in Dutch.

Please provide web address if relevant.

<http://www.atradiusdutchstatebusiness.nl/dsben/csr/environment-and-social-impact/index.html>

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.

All relevant technical information that will be used in the environmental and social review.

- b) competition.

All relevant technical information that will be used in the environmental and social review, excluding any commercial sensitive information concerning the transaction/project.

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 information that will be published: project name, location, project description and contact details and environmental impact information (e.g. EIA) or a summary thereof.

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

The information is released in the Dutch language.

including website address, if relevant.

http://www.atradiusdutchstatebusiness.nl/publicaties/Publicatie_milieu_informatie/index.html

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

The information is made available at least 30 days prior to commitment.

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

There are no legal constraints in disclosure of the project information.

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

Only in exceptional cases and if based on well-founded objections provided by the applicant and/or owner of the information, project information or parts of the information would not be disclosed or publication could be postponed.

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

To date, no circumstances have occurred that required not disclosing or postponing publication of the project information. On one occasion, the applicant withdrew their application as he deemed the publication of the information too commercially sensitive.

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.

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.

If a transaction after receiving the application form is classified as an A-project, the project information (project name, location, project description and contact details) will, as soon as possible but at least 30 calendar days before the issuing of the policy, be made publicly available.

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

This information will be posted on the Atradius webpage in the Dutch language.

website address, if relevant.

<http://www.atradiusdutchstatebusiness.nl/publicaties/afgegevenpolissen/index.html>

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

Information will be made publicly available as soon as possible but at least 30 calendar days before the issuing of the policy.

- 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).

There are no legal constraints.

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

Only in exceptional cases and if based on well-founded objections provided by the applicant and/or owner of the information, project information or parts of the information would not be disclosed or publication could be postponed.

- 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.

Atradius publishes all classified projects (A, B, C and M) on the webpage for each facility one month after final commitment is given (The so-called Transparency list).

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

On this list information is given (if applicable) on the date of commitment, country, buyer, exporter/investor, guarantor, financier, transaction description, maximum cover, classification and structural assistance.

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c) Who is responsible for disclosing such information.

ECA

d) The form and language of the information released

The form is an excel spreadsheet and the language used Dutch.

including website address, if relevant.

<http://www.atradius.com/nl/en/dutchstatebusiness/index.jsp>

e) How long the information remains publicly available.

This information remains publicly available for two years via the Atradius DSB webpage.

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

To date, no circumstances have occurred that required not disclosing or postponing publication of the project information.

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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.

Internal and external audit.

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.

Periodical reviews in cooperation with our Guardian Authority. The aforementioned policy document is a live document that will be reviewed annually and revised when appropriate.

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

Full compliance with information requests and full participation in practioners and other meetings.

Revising procedures :

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

June 2009

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

Revised Common Approaches of June 2007 and the publication of the revised Dutch CSR policy as per September 2009

49 Are any modifications foreseen in the near future?

No

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Resources

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

Atradius DSB employs environmental and social advisors and if needed will hire independent consultants with a specific expertise.

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

2

- 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?

The costs for the environmental and social review will be covered by Atradius DSB and the Dutch State. The costs of providing the environmental and social impact information are for account of the applicant.

Reporting

- 52 How frequently do you report *ex post* to the ECG, in accordance with paragraph 22 (tiret 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.

All environmental and social issues related to specific cases are discussed in the Credit Committee. Reports of which are stored in Knowledge Management System, accessible to all staff.

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

See above and periodical information session.

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

Yes

Please provide details.

Annual review of Atradius Dutch State Business and as of 2008 Atradius Dutch State Business publishes an annual sustainability report.

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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?

All applications which Atradius DSB considers for support are screened after which it is decided whether they will be classified. Also all applications with a repayment term of less than two years, regardless of the contract price, with a potential significant environmental and social impacts are screened and classified for further review.

Any Additional Comments

- 57 Please provide any additional comments.