

## SURVEY

## on the Environment and Officially Supported Export Credits Projects

## REPORTING COUNTRY INFORMATION

ESP-CESCE-SURVEY-DEC-09

Reporting Country	Spain	Reporting Institution	CESCE
Submission Date	18 December 2009	Version number	Dec-09

## I GENERAL PRINCIPLES

Objectives

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

Since early 2002, CESCE assesses the environmental impact of all transactions it insures on behalf account of the State with a repayment term of 2 years or more.

This 2 year threshold is established in the OECD Recommendation. It also coincides with the results of the research we carried out internally during the design phase of Cesce's environmental policy. At that time we established, by looking at Cesce's entire portfolio over a 5 year period, that all transactions entailing a possible negative impact on the environment were financed over a minimum of 2 years.

## Environmental requirements

Cesce verifies whether the projects it insures comply with host country legislation, the environmental standards established World Bank Group and, in some instances, European legislation and best practices. Factors taken into account include the impact on the project's site and its surroundings, the correct use of natural resources such as land, water, etc., compliance with water and air emissions limits, correct waste management, etc. Particular attention is paid to projects in sectors having a greater inherent impact on the environment (as listed in Annex I of the Recommendations) and to those located in sensitive areas.

One of the more immediate consequences of Cesce's environmental policy is the requirement of detailed technical information regarding the potential impact of each transaction. The amount of information required, as well as its content, varies depending on the type of transaction to be insured, whether it is a project, the sector of activity, its size, location, etc.

In order to expedite the implementation of these new requirements, Cesce has developed an automatic environmental screening tool, named Ecocheck. One of the main advantages of this system is that it includes interactive questionnaires, organized as a tree chart, in such a way that questions are displayed according to the answers provided to the previous ones, thus adapting the information requested to the characteristics of the transaction.

Ecocheck starts with a generic questionnaire, which, in just a few steps, allows, on the one hand, for the identification of both projects with no significant environmental impact and projects with a very significant environmental impact. The former are excluded from further review. The latter enter a case by case environmental review. The rest of projects –with potential impact but not so significant- undergo further scrutiny through Ecocheck's sector specific questionnaires. As of today, it includes more than 20 questionnaires covering the main environmental issues of a project: location, size, technologies, prevention practices, health and safety and pollutions limits, adapted to the different sectors of activities.

The information thus provided is automatically processed by the software itself, which evaluates each response and determines, based on a set of predetermined rules, a first evaluation of potential environmental impact of the project. Following this step, the environmental department reviews the questionnaires, requests additional clarification if required and, once it has received all the necessary information, validates the results provided by Ecocheck.

Remittance of environmental information

Cesce feels that the responsibility for the project complying with environmental standards lies on the exporter, even when the Insured is a third party, eg. a financial institution. The exporter will therefore be required to provide the necessary information, as well as to guarantee its veracity.

Exporters can fill in Ecocheck's environmental questionnaires through the on-line service request forms found at [www.cesce.es](http://www.cesce.es)

Environmental Information Disclosure Procedures

Disclosure Information of Category A Projects under consideration

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## on the Environment and Officially Supported Export Credits Projects

In accordance with the OECD Recommendation, Cesce provides public access to environmental information of category A projects before issuing a final commitment. The disclosure is carried out according to the following procedure:

1. Disclosure of Project information: Cesce publishes on its web page a project summary that includes, project name, location, available environmental information (EIA, Resettlement Plan, others, ...), contact person, and publication date.
  2. Access to environmental information: In principle, it is Cesce's responsibility to facilitate environmental information to those who legally request it. If information is publicly available through third parties' web pages, Cesce will facilitate access to those sites.
  3. Type of environmental information: for all category A projects, we request an Environmental Impact Assessment (EIA) and related documents (e.g.: Environmental Management Plan, Resettlement Plan, ...). Under exceptional circumstances, when the EIA includes reserved or confidential information, an Executive or Non-Technical Summary of the EIA could be acceptable, but should be as comprehensive as possible.
  4. Written authorisation: The exporter or project sponsor should send to Cesce written authorisation for the project summary publication on our web page, as well as for the environmental information disclosure under request by an interested party.
  5. Publication: The information is published as soon as possible during the environmental review process and at least 30 days before a final commitment to grant official support.
- Publication of experience on category A and B projects
- CESCE publishes, on a quarterly basis, information of the main aspects of category A and B projects for which CESCE has provided official support, with a share above SDR (Special Drawing Rights) 10 million.

## Annual Report

Annually, CESCE publishes in its web page a statistical report summarizing the outcomes of the environmental review of all the applications received during the reporting year. All category A and B policies issued are described in the report.

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### II SCREENING AND CLASSIFICATION OF PROJECTS

#### Exemptions

2 Are all applications screened?

We screen all applications with a credit repayment term of two years or more, with the exemption of Bonds, including those which their share are below SDR 10 million.

#### Information requirements

3 What information is required for the screening process?   
Please provide details of information required.

All applicants must complete a generic environmental questionnaire which includes a description of the project, information about environmental sensitivity of project site; final use of exported goods and services; whether they are to be incorporated into an existing facility, and, if so, whether it is undergoing changes in output or function. We ask whether an environmental review has been carried out and, if so, request the EIA or any other available documentations.

#### Responsibilities

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

Please provide details.

Mainly the exporter who, if necessary, could ask the project sponsor for more information.

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?

The environmental practitioners get in touch with the exporters as soon as an application form is received. We inform about the obligation to fill in an environmental questionnaire and show them how to access it in our web page.

#### Scope and criteria of screening

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

Based on the result of the environmental questionnaire referred in the answer to question 3, the exporters should fulfil a sector-specific questionnaire where we ask for additional information. The latter includes questions about the needs of associated project infrastructures increase, and about the origin of inputs (water, raw material, ...). Additionally, on a case by case basis, we could get in touch with the exporter to ask for additional information to better understand different operations of the project and how they are linked to each other.

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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).

Any other comments.

When co-insurance takes place, we get in touch with ECAs involved in the transaction so we can share information and approaches. Additionally, when a transaction is financed by an IFI we try to obtain its assessment report and conclusions. Nevertheless, we always conduct our own screening. Only in case where we have very little participation in the project (less than 10%) and the exporter has difficulties to access to environmental information, we rely on screening by other ECAs or IFIs.

b) Re-insurance as lead ECA.

Any other comments.

We would share our screening result with others ECAs.

c) Re-insurance as re-insurer.

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]?

See question 3. At the same time, we usually search on the web to obtain additional information about the project.

#### New projects

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

The first question we ask in our questionnaire is whether the exports are destined to a new project. At the same time, we usually search on the web to obtain additional information about the project.

#### Other exports

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

For goods that may cause environmental impacts by themselves (e.g., engines, boilers, cooling systems, ships, ...), we require information in order to make sure that they comply with international standards (e.g., air emission standards, the Montreal Protocol, MARPOL Protocol, ...). For the rest we classify transactions as "non-project" and would not conduct any further environmental review.

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### Classification system

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

### Scope of classification

- 13 Do you classify exports of capital goods and services

- a) that are to existing operations?

Please provide details.

Yes if there is material change (according to the 5.1 of the OECD Recommendation) or if there are significant environmental or social impacts. Otherwise, we classify that transaction as "no project".

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

Please provide details.

We classify those transactions as "no projects".

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

We classify all projects, irrespective of their value.

### 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.

An Environmental Impact Assessment (EIA) of the project is required for all category A projects, and for those category B projects where local legislation requires it. We also ask for it in all cases where the EIA has been developed even if there is no legal obligation to do so. For the rest of category B projects the exporter must fulfil a sector specific environmental questionnaire that includes inquiries about project location, size, technical characteristics (such as BAT), performance indicators (atmospheric emissions, liquid effluents, noise, ...), mitigation and good practices (management of emissions, waste waters, landscape, hazardous substances, solid wastes, protection of flora and fauna, ...) and health and safety. In case we detect any potential uncontrolled environmental impact, we continue the review through direct contact with the exporter. For category C projects and "No projects": no environmental review is required except for exports of goods that may cause environmental impacts by themselves (e.g., engines, boilers, cooling systems, ships, ...), where we require information in order to make sure that they comply with international standards (e.g., air emission standards, the Montreal Protocol, MARPOL Protocol, ...).

#### Responsibilities

- 17 Who is responsible for providing the information required to review projects?

Other

Please provide details.

Mainly the exporter who, if necessary, could ask the project sponsor for more information. For project category A, project sponsor usually also gets involved in providing information required.

- 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.

Based on the result of the environmental questionnaire referred in the answer to question 3, the exporters should fulfil a sector-specific questionnaire where we ask for additional information. The latter includes questions about the needs of associated project infrastructures increase, and about the origin of inputs (water, raw material, ...). Additionally, on a case by case basis, we could get in touch with the exporter to ask for additional information to better understand different operations of the project and how they are linked to each other.

- 20 Please specify any particular practices followed in reviewing projects in cases of:

- a) Co-insurance/co-finance with other ECAs, IFIs or your Development Agency.

Would always conduct own review

Any other comments.

When co-insurance takes place, we get in touch with ECAs involved in the transaction so we can share information and approaches. Additionally, when a transaction is financed by an IFI we try to obtain its assessment report and conclusions. Nevertheless, we always conduct our own review. Only in cases where we have very little participation in the project (less than 10%) and the exporter has difficulties accessing environmental information, we rely on other ECAs or IFIs' reviews.

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- b) Re-insurance as lead ECA.

Any other comments.

- c) Re-insurance as re-insurer.

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?

- 22 a) Who is responsible for  
i) Commissioning an EIA?

Any other comments.

- ii) Carrying out an EIA?

Any other comments.

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

Please provide details.

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

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**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.

An Environmental Impact Assessment (EIA) of the project is required for category B projects where local legislation requires it or when it is already developed. For the rest of category B projects, the export must fulfill a sector specific environmental questionnaire, that gathers information regarding location, size, technical issues (such as BAT), performance indicators (atmospheric emissions, liquid effluents, noise, ...), mitigation and good practices (management of emissions, waste waters, landscape, hazardous substances, solid wastes, protection of flora and fauna, ...) and health and safety. In case we detect any potential uncontrolled environmental impact, we continue the review through direct contact with the exporter.

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 applications of exports of capital goods and services to existing operations undergoing no material change in output or function, with a delivery contract amount above SDR 10 million, we review relevant environmental risks of the exported goods in themselves (e.g., civil works, air emissions of engines or boilers, etc.) and we usually search on the web to obtain additional information about the buyer and the operation. For applications of exports of capital goods and services to existing operations undergoing no material change in output or function, with a delivery contract amount lower than SDR 10 million, no environmental review is carried out. For applications of exports of capital goods and services to existing operations undergoing material change in output or function, we conduct the same review as for a new project.

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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.

For goods that may cause environmental impacts by themselves (e.g., engines, boilers, cooling systems, ships, ...), we require information in order to make sure they comply with international standards (e.g., air emission standars, the Montreal Protocol, MARPOL Protocol, ...). The rest are classified as "non-project" and no environmental review is carried out.

Standards

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

For projects category A and B we allways ask if host country standards require an EIA. If that is the case, we require it. Usually the EIA assess compliance with local legislation requeriments. We also ask for a copy of local environmental permits required.

- 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.

Allways when an Equator Bank is involved

- 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.

We use BREF reference documents (asociated to IPPC Directive) when a project has been designed to comply with the EU BAT requirements or as additional sectorial guidelines for the environmental review of projects.

- 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 Rarely

Public/non-sovereign Rarely

Corporate Rarely

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Limited or non-recourse  
project finance  
transaction

Rarely

- b) IFC Environmental, Health and Safety Guidelines.

Any other comments.

Sovereign In most cases

Public/non-sovereign In most cases

Corporate In most cases

Limited or non-recourse  
project finance transaction In most cases

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

- a) World Bank Safeguard Policies. 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.

Allways when an Equator Bank is involved

- 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.

We use BREF reference documents (asociated to IPPC EU Directive) when a project has been designed to comply with its requirements or as additional sectorial guidelines for the environmental review of projects.

- 30 Please provide details of the circumstances, if any, in which you use the following technical international standards for the purposes of evaluating the potential environmental impacts of Category B projects (i.e. for sovereign, public / non-sovereign, corporate, limited or non-recourse project finance transactions):

- a) The Pollution Prevention and Abatement Handbook.

Any other comments.

Sovereign Rarely

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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.

We use BREF reference documents as additional sectorial guidelines for the environmental review of projects on sensitive sectors

- 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.

Regarding some specific issues we also use international agreements, such as MARPOL Convention, Montreal Protocol, World Commission on Dams standards, etc.

- 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 first try to understand circumstances why the standards are not met and consequences derived of non-fulfilment considering specific characteristic of the project. When necessary we try to encourage the sponsor to carry out necessary mitigation measures in order to reach the standards. In case the project could not meet those standards, CESCE could refuse to provide cover although this has not happened so far.

**Site visits**

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

In very sensitive projects

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**IV EVALUATION, DECISION AND MONITORING****Conditions to official support**

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

We distinguish between conditionality prior and after official support. We may introduce conditions in our offers of cover, i.e. prior to the issuance of a policy, regarding e.g. the submission of specific information (e.g. EIA) with acceptable conclusions. In that case the issue of the policy will be conditioned to the fulfilment of such conditions. After the final commitment, conditions may be incorporated into the policy and/or into the loan agreement.

Please provide examples of any environmental covenants used.

Compliance with environmental management plans, compliance with international environmental guidelines, covenants defining environmental monitoring arrangements etc.

**Denying official support**

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

Significant breaches of international standards.

Please provide any examples of experience.

We have not actually refused cover due to environmental considerations. However, we have had cases in which the environmental requirements imposed by CESCE acted as deterrence, and the application for official support was withdrawn.

**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 arrangements may vary from project to project, depending among other on the type of covenants included. For example, when covenants refer to the development of additional reports or plans, we require such documentation within the timeframe established in the policy/loan agreement or the Management Plan. When covenants refer to the compliance of environmental guidelines, we ask for periodic (usually every six-months) environmental monitoring reports (air emissions, waste water, noise, ...)

Monitoring frequency/period:

Vary from project to project but we usually required every six month

Content:

When covenants refer to the development of additional reports or plans, we require such documentation within the date established in the policy/loan agreement or the Management Plan. When covenants refer to the compliance of environmental guidelines we ask for periodic (usually every six-months) environmental monitoring reports (air emissions, waste water, noise, ...)

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Reporting method:

In agreed written format.

- 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?

When we include covenants in the policy/loan agreement, we usually include as well potential actions that may be taken in case of breach of conditions. Most common potential actions taken into consideration are cancellation of cover and acceleration of the repayment period. Conditions usually foresee a grace period (usually 60 days after breach) before any punitive action, in order to allow the sponsor to present an Action Plan to correct deviations with a proposal of mitigation measures and dates of implementation.

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.

No experience of breach of conditions, so far

### 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?

In case of very environmental sensitive 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?

In case of very environmental sensitive 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?

CESCE's web page.

Please provide web address if relevant.

[http://www.cesce.es/cda/contenido2\\_id12.jsp?pageid=182&seccion=1&subseccion=4&menu=341](http://www.cesce.es/cda/contenido2_id12.jsp?pageid=182&seccion=1&subseccion=4&menu=341)

#### 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.

During the screening process we investigate whether other ECAs are involved in the project. If so, we get in touch with those ECAs by email. In case of IFI we usually consult project web page in order to check conclusions of environmental evaluation

- b) competition.

Same answer as to the question 42 a)

#### 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.

Previous to public disclosure of environmental information, we require from the exporter/sponsor an authorization to publish in our web page project information and to deliver, to whom may require it, environmental information. Once we have such authorization, we publish the following project information in our web page: project name, location, sector, environmental information publicly available –usually on request–, contact person (usually from CESCE) or web site of the EIA, and date of disclosure.

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

The project information is released in Spanish and English in CESCE's web page.

including website address, if relevant.

[http://www.cesce.es/cda/contenido2\\_id12.jsp?pageid=187&seccion=1&subseccion=4&menu=341](http://www.cesce.es/cda/contenido2_id12.jsp?pageid=187&seccion=1&subseccion=4&menu=341)

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

We have established a minimum of 30 calendar days but not a maximum. We usually release the information on our website as soon as we receive environmental information and the exporter/sponsor gives consent for disclosing it. Information remains published until issue of the policy.

- 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).

CESCE is legally bound to protect all commercial sensitive information and to keep it confidential. Before we publicly disclose project related environmental information, we required from the exporter/sponsor an authorization to publishing it in our web page and to deliver it to whom may require it.

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

None so far

- 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. 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.

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

Environmental Impact Assessment report and related environmental information (e.g. environmental management plan, resettlement plan, social information, ...). Under exceptional circumstances we can publish only the executive summary of the EIA.

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

As mentioned before, we publish on our website a brief description of the project, available environmental information and contact person in CESCE. Environmental information of the project can be obtained by phoning or sending an e-mail to such person. When the project has its own web page, besides the contact person we also publish the web site in which information can be found.

website address, if relevant.

[http://www.cesce.es/cda/contenido2\\_id12.jsp?pageid=187&seccion=1&subseccion=4&menu=341](http://www.cesce.es/cda/contenido2_id12.jsp?pageid=187&seccion=1&subseccion=4&menu=341)

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

We have established a minimum of 30 calendar days but not a maximum. Information is available as soon as we receive environmental information and the exporter/sponsor gives consent for disclosing it. Information remains available until the policy has been issued.

- 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).

CESCE is legally bound to protect all commercial sensitive information and to keep it confidential. Before we publicly disclose project related environmental information, we required from the exporter/sponsor an authorization to publishing it in our web page and to deliver it to whom may require it.

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

None so far

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

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**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.

We publish ex post information on CESCE's web site on a quarterly basis. We also publish annually on our web site a more extensive report about experience and statistics on the application of our environmental policy.

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

Information released on a quarterly basis comprises a brief description of all new category A and B projects covered during the reporting quarter, for which our share is above 10 million SDR. The description includes: project name, country, environmental standards used as a reference and conclusions of the environmental assessment.  
Regarding our annual report, that includes comprehensive information about experience and statistics on the

- c) Who is responsible for disclosing such information.

ECA

- d) The form and language of the information released

Information is released in both English and Spanish at CESCE's web page

including website address, if relevant.

[http://www.cesce.es/cda/contenido2\\_id12.jsp?pageid=187&seccion=1&subseccion=4&menu=341](http://www.cesce.es/cda/contenido2_id12.jsp?pageid=187&seccion=1&subseccion=4&menu=341)

- e) How long the information remains publicly available.

Quarterly reports are publicly available until the annual report of the corresponding year is released. Annual reports are kept. All annual reports since 2004 are currently available.

- 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.

CESCE has an Environmental Management System certified according ISO 14.001 standard. Environmental policies and procedures are audited annually as part of the System revision process

**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.

CESCE' environmental policy has been developed following instructions from our Guardian Authorities. Principles and procedures have been designed in close collaboration with them, and is subject to their monitoring.

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

We share experiences with other members through practitioners meetings, on-going exchanges of information regarding technical aspects of implementation of the Common Approaches, specific projects in co-insurance or re-insurance situations, the present survey, ...etc.

**Revising procedures :**

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

January 2008

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

Motivation was to take into account the new Common Approaches text from 6/2007 as well as to change some practical issues based on experience that we had gathered.

- 49 Are any modifications foreseen in the near future?

No

**Resources**

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

CESCE has two full-time environmental advisers.

- 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.

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### Cost-sharing

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

Costs related to the provision of environmental information to CESCE are borne by the applicant's/exporter's/sponsor's account. CESCE bears the cost of having an in-house full time environmental team, and all related costs.

### 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.

We keep a database of all projects, in which we record communications with exporters/sponsors, technical sector information consulted, conclusions of the environmental review, covenants, ...

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

Documentation is kept in electronic format though a structured electronic filing tool, transaction by transaction, including environmental information (communication with exporters/sponsors, environmental questionnaires, consultation with other practitioners, EIAs and so forth). Information is accessible to all the staff at the Department (environmental practitioners and all underwriters).

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

Yes

Please provide details.

Annual report, that includes comprehensive information about experience and statistics on the application of our environmental policy (percentage, number, sector and results of the review about applications under each Category A, B or C). Annual report is available at CESCE's web page.

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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?

We do not screen or review transactions with a repayment term of less than two years, so far

#### Any Additional Comments

- 57 Please provide any additional comments.