

## SURVEY

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

#### REPORTING COUNTRY INFORMATION

*DEU-EULER-HERMES-SURVEY-JULY-09*

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.

Special Sustainability Unit implemented for assessing environmental issues. Regular information about innovations and changes in the international regulations pertaining to environmental issues to exporters and financiers through newsletter, brochures and meetings. Special environmental page on website. Disclosure of OECD Recommendation on our website. Publishing of all covered projects above 15 million EUR. Ex ante disclosure of all category A projects with description and EIA or link to EIA. Workshops with exporters on environmental issues.

## DEU-EULER-HERMES-SURVEY-JULY-09

### II SCREENING AND CLASSIFICATION OF PROJECTS

#### Exemptions

2 Are all applications screened?

Yes

#### Information requirements

3 What information is required for the screening process?

Other

Please provide details.

Application form and, in case of projects above the threshold, project memorandum of the exporter to screen criteria mentioned in the Common Approaches. A general environmental questionnaire is provided on the website, in addition sector specific questionnaires can be used by the applicant. The information provided through these questionnaires will also be used in the screening process.

#### 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?

Underwriter and Environmental Practitioner (always jointly)

#### Timing

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

At the very beginning (time of application)

#### Scope and criteria of screening

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

The environmental questionnaire asks for information on the overall surrounding of the project; if not provided with the application, additional information e.g. on power plants etc. connected with the project is requested.

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.

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

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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]?

Information by applicant, project memorandum. Specific question in our environmental questionnaire with regard to deliveries to existing operations (including questions on whether the export leads to changes of the existing operation).

### **New projects**

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

Information by applicant, project memorandum. Specific question in our environmental questionnaire with regard to deliveries to existing operations (including questions on whether the export leads to changes of the existing operation).

### **Other exports**

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

In general there is no difference in the screening process for such exports. If the exports are not destined to an identified operation/project (according to the definition in para 5.2 of CA) no further steps are taken after the screening. Therefore such projects are not submitted to the sustainability department by the underwriter. In practice this happens to i.a. applications for aircrafts, ships and rolling stock without link to a new railroad trail.

### **Classification system**

- 12 Does your classification system vary from that of the Recommendation?  
Please provide details.

Yes

We do apply a classification system in accordance to the Recommendation. Additionally there are two internal categories for a) certain projects on short term repayment conditions (see below, Q 56) and b) exports to existing operations without material change in output or function.

### **Scope of classification**

- 13 Do you classify exports of capital goods and services

a) that are to existing operations?

Yes

Please provide details.

As stated above (Q 12) these exports are classified in an internal category.

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?

Below the threshold exports will be classified in case of a) deliveries to "sensitive areas" according to Annex I of the Recommendation, b) obvious high environmental or social risks.

### **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.

Case-by-case approach

Please provide details.

For all category A projects an EIA is obligatory. For category B projects there are internal sector specific questionnaires on the information generally needed when reviewing them. These questionnaires will be adapted on a case-by-case basis. Generally, when reviewing projects we require detailed information on the technical aspects and design of a project (this includes processes applied, raw materials used, use of hazardous materials, associated processes/plants, necessary infrastructure etc.) in order to be able to identify any impact/hazard from the project; emission data on the key parameters and site specific information (e.g. surrounding sensitive areas, if people living close to the plant/ or how far away, how they might be affected, have they been informed, are there any objections against project etc.). Emission levels are obligatory information when reviewing category A and 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)

#### Scope and criteria

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

Information on associated facilities and operations (like e.g. power production and supply, infrastructure for transport of raw materials or products, required capacities expansions in up-stream production line) is part of our general information requirement (see answer Q 16) and is taken into account when reviewing a project. Whether a facility is regarded as associated and thus subject to the review is decided case-by-case. Important questions in this regard are whether the project/plant is depending on the facility and whether the latter is operated by the same company (or consolidated company) that operates the project/plant. If a facility is regarded as associated and part of the review process, emission data is requested and benchmarked the same way as the emission data for the main part of a project.

- 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.

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c) Re-insurance as re-insurer.

May take account of 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?

Yes

Please provide details, including any examples of experience.

We reviewed category A projects without a formal EIA report, but where a number of individual studies were conducted and where the information of all studies combined covered the issues and content of a formal EIA.

In cases where an EIA did not adequately address all issues connected with a project, we required additional information or studies to cover/solve the open issues to our satisfaction. In some cases where additional studies could not be conducted in time for our decision making due to tight time schedule of some projects/financial close of projects, the conduction of the studies and the implementation of all necessary mitigation measures were set as environmental conditions.

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

Applicant (in most cases)

Any other comments.

Applicant is responsible for submission of EIA, however in most cases EIA is commissioned by project owner.

- 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)

Any other comments.

In exceptional cases, an external consultant may be involved.

**DEU-EULER-HERMES-SURVEY-JULY-09****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.

As we do not necessarily require EIAs for category B projects, our source of information is the German exporter or the applicant. The information we need for the review of a project is mostly covered by our questionnaires (sector independent and sector specific questionnaire). Before transmitting the questionnaires to the exporter/applicant they are adapted to the individual case in so far as any site or project specific issues/questions/information request is added that is not covered by the standard questionnaires. The questionnaires comprise technical aspects and design of a project, emission data on the key parameters and site specific information (as further specified in answer Q16).

The aspects of involuntary resettlement, impacts on indigenous peoples or cultural heritage (as queried below) would be checked upon if they are an issue with a category B project, but it should be noted here that any project involving significant involuntary resettlement, impacts on indigenous peoples or cultural heritage would not be categorised B; these would in general be category A projects!

With regard to the answers below it should be noted that "case-by-case" means that, if we deem an examination of the respective item necessary, it is "always" considered.

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	<u>Case-by-case</u>
Policy, legal and administrative framework	<u>Case-by-case</u>
Project description	<u>In most cases</u>
Baseline data	<u>Case-by-case</u>
Environmental impacts	<u>In most cases</u>
Analysis of alternatives	<u>Case-by-case</u>
Environmental Management Plan	<u>Case-by-case</u>
Consultation	<u>Case-by-case</u>

Paragraph 8 (tired 1):

significant air emissions, effluents, waste or noise	<u>In most cases</u>
significant use of natural resources	<u>In most cases</u>
involuntary resettlement	<u>In most cases</u>
impacts on indigenous peoples	<u>In most cases</u>
cultural property	<u>Case-by-case</u>

**Existing operations**

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

We mainly rely on the information supplied by the exporter and on the project memorandum, we undertake an internet investigation on the project and on the buyer. In case of possible risks we would insist on a full review of the identified risks. However the overall project does not necessarily have to meet international standards.

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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?

No

### Standards

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

In case of category B projects we ask the applicant to provide information on the compliance with host country standards. This may e.g. happen in the context of the project memorandum. In case of category A projects information on compliance with host country standards shall be included in the EIA. Otherwise the applicant will be asked to additionally provide these informations.

- 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.

Always

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

Other

Please provide details.

IFC Performance Standards are applied if this constitutes an advantage to the applicant, e.g. if, due to Equator Principles bank participation, the project is assessed according to IFC Performance Standards.

- c) Regional Development Bank standards.

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

Please provide details.

Regional Development Banks standards may be applied if such an institution was/ is involved in the project.

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

EU standards or German standards are applied in cases the exporter provides information with respect to such 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

Case-by-case

As the PPAH is substituted for nearly all sectors by the IFC EHS Guidelines as of end of 2007, all projects from 2008 on will be benchmarked against IFC EHS Guidelines; PPAH will be used only on case-by-case approach if IFC EHS Guidelines are not available.

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Public/non-sovereign  

As the PPAH is substituted for nearly all sectors by the IFC EHS Guidelines as of end of 2007, all projects from 2008 on will be benchmarked against IFC EHS Guidelines; PPAH will be used only on case-by-case approach if IFC EHS Guidelines are not available.

Corporate  

As the PPAH is substituted for nearly all sectors by the IFC EHS Guidelines as of end of 2007, all projects from 2008 on will be benchmarked against IFC EHS Guidelines; PPAH will be used only on case-by-case approach if IFC EHS Guidelines are not available.

Limited or non-recourse project finance transaction  

As the PPAH is substituted for nearly all sectors by the IFC EHS Guidelines as of end of 2007, all projects from 2008 on will be benchmarked against IFC EHS Guidelines; PPAH will be used only on case-by-case approach if IFC EHS Guidelines are not available.

## b) IFC Environmental, Health and Safety Guidelines.

Any other comments.

Sovereign  

Public/non-sovereign  

Corporate  

Limited or non-recourse project finance transaction  


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

a) World Bank Safeguard Policies. 

b) International Finance Corporation (IFC) Performance Standards.

Please provide details.

IFC Performance Standards are applied if this constitutes an advantage to the applicant, e.g. if, due to Equator Principles bank participation, the project is assessed according to IFC Performance Standards anyway.

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- c) Regional Development Bank standards.

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

Please provide details.

Regional Development Banks standards may be applied if such an institution was/ is involved in the project.

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

EU standards or German standards are applied in cases the exporter provides information with respect to such 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  Case-by-case

As the PPAH is substituted for nearly all sectors by the IFC EHS Guidelines as of end of 2007, all projects from 2008 on will be benchmarked against IFC EHS Guidelines; PPAH will be used only on case-by-case approach if IFC EHS Guidelines are not available.

Public/non-sovereign  Case-by-case

As the PPAH is substituted for nearly all sectors by the IFC EHS Guidelines as of end of 2007, all projects from 2008 on will be benchmarked against IFC EHS Guidelines; PPAH will be used only on case-by-case approach if IFC EHS Guidelines are not available.

Corporate  Case-by-case

As the PPAH is substituted for nearly all sectors by the IFC EHS Guidelines as of end of 2007, all projects from 2008 on will be benchmarked against IFC EHS Guidelines; PPAH will be used only on case-by-case approach if IFC EHS Guidelines are not available.

Limited or non-recourse  
project finance transaction  Case-by-case

As the PPAH is substituted for nearly all sectors by the IFC EHS Guidelines as of end of 2007, all projects from 2008 on will be benchmarked against IFC EHS Guidelines; PPAH will be used only on case-by-case approach if IFC EHS Guidelines are not available.

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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.

### 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.

Conditions can be included in the insurance contract between the Federal Republic of Germany and the exporter/bank. Such conditions mostly oblige the exporter/bank to include environmental conditions in their respective contracts with the buyer/borrower, which is the responsible party for carrying out the measures of the conditions. These conditions in the loan or delivery contract can be connected to an environmental event of default regulation which foresees suspension of deliveries and/or payments in the case a condition is not met and not remedied within a granted period of time.

Please provide examples of any environmental covenants used.

Agreed Terms of Reference; Monitoring reports; Installation of additional waste water treatment plant; installation of waste gas treatment; change in design of plant and additional SNCR plant

#### Denying official support

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

The official support would be denied if the expected environmental performance of the project causes a lack of eligibility of support and/ or justifiability of risk. Generally projects not meeting environmental standards they are benchmarked against are not eligible for support (for exceptions see Q 33).

Please provide any examples of experience.

Examples for denial of support are rare since usually, when during/ at the beginning of the application process it becomes obvious that a denial is likely, applicants withdraw their application.

#### 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 measures are applied if cover was provided under certain environmental conditions

Monitoring frequency/period:

The monitoring frequency depends on the specific of the project and decision. This may require one-time or periodic monitoring of various frequency.

Content:

On a case by case basis: the information required to verify or falsify compliance with environmental conditions.

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Reporting method:

Also on a case by case basis: in general the applicant is asked to hand in monitoring reports.

- 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?

At first there will be consultation with the applicant on how to restall compliance with relevant conditions. This includes verifying the reasons for non compliance and developing possibilities to restall compliance. If compliance can not be achieved by way of consultation on working level, consultation at higher levels, including diplomatic measures, are applied. In some cases non-compliance may constitute an environmental event of default.

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

Other

Please provide details.

Environmental practitioner in coordination with underwriter and governmental authorities.

Please provide any examples of experience.

There are two cases where intensive consultations are carried out in order to restall compliance with the relevant conditions.

### **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?

Especially for projects with higher public interest (e.g. HEPP and projects where resettlement is foreseen).

- 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?

case-by-case

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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?

website

Please provide web  
address if relevant.

<http://www.agaportal.de/en/aga/nachhaltigkeit.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.

As a rule in case of multisourcing projects, a close cooperation with the other ECAs/ IFIs is aimed for to create synergies and to avoid differing approaches with regard to the environmental assessment.

- b) competition.

Information sharing is sought on the approach of the other institution with regard to environmental assessment, categorisation, information required, aspects reviewed and outcome of the review.

#### 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.

In accordance with the regulations of the Common Approaches environmental information of category A-projects is published at least 30 days prior to final commitment on our homepage. This contains a short description of the project data and the EIA or a link to the EIA.

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

Project description in German, EIA in English (most cases)

including website address, if relevant.

<http://www.agaportal.de/en/aga/nachhaltigkeit/umwelt/projekt/a-projekte.html>

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

minimum 30 days prior to final 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).

Regulations regarding this issue can be found in the German criminal and administrative law (preventing public authorities to provide confidential data received when processing applications) as well as in the German Environmental Information Act (*Umweltinformationsgesetz, UIG*) and the German Freedom of Information Act (*Informationsfreiheitsgesetz, IFG*), which entitles third persons to access to data processed by public authorities provided that no exception prevents the authority from disclosing the data. In summary, any publication of data concerning confidential business information requires the consent of the concerned party which is in our case the exporter or bank. As the consent of the applicant must be given on a voluntary basis, the consent can not be made a condition of granting cover. However, practical experience shows that in almost all cases, consent is given when sought.

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

No consent of the applicant (however, until now no such case has occurred).

- 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.

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

In accordance with the regulations of the Common Approaches environmental information of category A-projects is published at least 30 days prior to final commitment on our homepage. This contains a short description of the project data and the EIA or a link to the EIA.

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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).

Project description in German, EIA in English (most cases).

website address, if relevant.

<http://www.agaportal.de/en/aga/nachhaltigkeit/umwelt/projekt/a-projekte.html>

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

minimum 30 days prior to final committment

- 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).

Regulations regarding this issue can be found in the German criminal and administrative law (preventing public authorities to provide confidential data received when processing applications) as well as in the German Environmental Information Act (Umweltinformationsgesetz, UIG) and the German Freedom of Information Act (Informationsfreiheitsgesetz, IFG), which entitles third persons to access to data processed by public authorities provided that no exception prevents the authority from disclosing the data. In summary, any publication of data concerning confidential business information requires the consent of the concerned party which is in our case the exporter or bank. As the consent of the applicant must be given on a voluntary basis, the consent can not be made a condition of granting cover. However, practical experience shows that in almost all cases, consent is given when sought.

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

No consent of the applicant (however, until now no such case has occurred).

- 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.

1) Applicants of all projects (not depending on the category) with an order value exceeding 15 million EUR (and data of selected projects of special public interest below this threshold) are requested to grant their approval for publication of certain project data. Given the consent of the applicant to public disclosure, the project data will be added to a list of project information that can be viewed on the website of Euler Hermes since October 2001. <http://www.agaportal.de/en/aga/nachhaltigkeit/umwelt/projekt/liste.html>  
2) In addition the OECD Reporting is published on a yearly basis.

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

1) mainly statistic information on a) exporter, b) financier, c) project (delivered goods), d) value category, e) buyer country, f) credit period; 2) Reporting

c) Who is responsible for disclosing such information.

ECA

d) The form and language of the information released

German and English

including website address, if relevant.

<http://www.agaportal.de/en/aga/nachhaltigkeit/umwelt/projekt/liste.html>

e) How long the information remains publicly available.

Information is archived from 2003 on. OECD reporting is published since 2004.  
<http://www.agaportal.de/en/aga/nachhaltigkeit/umwelt/projekt/archiv.html>  
<http://www.agaportal.de/pages/aga/nachhaltigkeit/umwelt/projekt/archiv.html>

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

## DEU-EULER-HERMES-SURVEY-JULY-09

### 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.

a) written internal guidelines for environmental practitioners and underwriters; b) requirement of crosschecking from experts; c) different ministries with different focus involved in decision making body on guardian authority level; d) disclosure of cat. A and B projects; e) reporting on screened projects in annual report; f) internal training for "rookies"; g) practitioner meetings

#### 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.

regular exchange of environmental practitioners experience with underwriters and our governmental authorities; building a database on exemplary projects and assessment topics

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

bi- and multilateral contacts / workshops on special issues, e.g. on sector specific assessment guidelines; practitioner meetings; sector working groups

#### Revising procedures :

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

July 2007

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

Revised Recommendation of June 2007

- 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?

Implementation of a Sustainability Department

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

6

- 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?

In general cost for environmental assessment are covered by application fees and premium. In an exceptional case, monitoring fee has been required.

### 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?

Other

Please provide details.

We report on a quarterly basis.

### 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.

Comprehensive database on all assessed projects containing all information reviewed, exchange with applicant etc.

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

workshops, working groups, and their documentation; database mentioned under question 53

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

Yes

Please provide details.

Yearly summary for our governmental authorities on German Category A and B projects and on the outcome of yearly ECG information on reporting of all members. Special section in annual report.

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## DEU-EULER-HERMES-SURVEY-JULY-09

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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?

Deals with such short repayment terms that might have high environmental and reputational risks are reviewed and classified in an internal category. This mainly accounts for projects that

- 1) would fall in Category A under long term conditions,
- 2) projects in 3 defined sensitive sectors (pulp and paper, dams and mining) or
- 3) projects with turn-key delivery of large plants above 50 Mio EUR.

All other projects would only be assessed and reviewed if there are clear hints that the project will have major environmental impacts.

#### Any Additional Comments

- 57 Please provide any additional comments.