

Environmental and Social Survey

REPORTING COUNTRY INFORMATION

ESS-NOR-GIEK (27-03-2015) version 3

Reporting Country

Norway

Reporting Institution

GIEK

Submission Date

27 March 2015

Version number

3

I GENERAL PRINCIPLES

Objectives

1. Please describe the policies and procedures that you have established to support the objectives of the Recommendation. Please include details about your organisational structure, the operational process and supporting tools.

GIEK has policy and procedures in place to comply with the requirements of the Common Approaches, as well as to take additional considerations with respect to land based projects under 10 mil SDR, application of IFC PS to all projects, and maritime projects/mobile units.

Environmental and human rights questions, which are required to be submitted as part of the applications, are used as the basis for the initial screening process and discussions with the exporter and project sponsor on environmental and social requirements. Additional measures are taken to identify potential human rights impacts independent of information provided by the exporter and project sponsor.

In-house practitioners screen all projects with a fixed locations (including mobile projects with a contract period over two years, such as FPSOs and drill ships), categorize accordingly, review environmental and social information, and request additional information/studies /gap analysis, etc. where necessary. Practitioners communicate requirements to the exporter and project developer, as well as provide advice to them on how to comply with requirements.

The Practitioners will provide management with their assessment of the project's compliance with international standards, and where required, recommend conditions for support. Final decision for granting support is made by management with the advice from the Practitioner.

Covenants requiring follow-up or monitoring are done so by the practitioner. At times this is done with the advice from an independent supervisory consultant.

The ESIA for all Cat. A projects are made available on GIEK's webpage at least 30 days prior to granting support, but normally well before this. Information on Cat. B projects can also be acquired from GIEK's where this information is available.

2. Please provide a link to the environmental and social due diligence page of your institution's website.

http://www.giek.no/en/om_giek/social-responsibility

II SCREENING

Exemptions

3. Are all applications (apart from those related to military equipment and agricultural commodities) screened? ☒ Yes

If no, please provide details of any exemptions from screening, including:

(a) value of any threshold used:

(b) currency:

(c) details of any products exempt from screening:

No exeptions. Mobile units, such as ships, are also screened.

(d) details of any other exemptions from screening:

Our policy is that bond support is screened.

Information requirements

4. What information is required for the screening process?

Application form

☒

Separate environmental/social questionnaire

☒

Sector / issue-specific questionnaires (please specify)

☒

Other (please specify)

☒

Environmental and Human Rights questions are included in the application form. There are gerneal questions applicable to all application, and other that are specific dependant on whether the project is land-based or maritime/mobile units.

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Responsibility for screening

5. Who is responsible for screening applications?

Underwriter	<input checked="" type="checkbox"/>	Practitioner	<input checked="" type="checkbox"/>
ECA Consultant	<input type="checkbox"/>	Other (please specify)	<input type="checkbox"/>

All applications under the scope of the CA are screened by the practitioners. With respect to maritime projects/mobile units, the underwriter is responsible for initial screening of applications, following a written procedure designed by the practitioners; applications which trigger further consideration are sent further to the practitioners.

Screening policies

6. Do you have policies and procedures in place to identify exports of capital goods and services destined to:

(a) Projects or to existing operations as defined in the Recommendation?

Yes

If yes, please provide details:

Under the current procedure, deliveries to existing projects are normally classified in category C unless they contribute to major changes "in output or function" of the project itself or the buyer's operations. GIEK may, however, opt to classify such transactions in a higher class, or to reject the application, if the project in question is contributing to a severe degree of damage to society/social aspects and/or the environment. A discretionary assessment will be made of the Norwegian consignment's contribution in this respect.

(b) Identified locations that are in or near sensitive areas?

Yes

If yes, please provide details:

Information on location and vicinity on, or near sensitive areas is included in the sector specific questionnaires required to be submitted along with the application for all projects. Further assessment on this is conducted if there is a positive response, or if there is reason to believe the response was inaccurate. Sensitive areas is not limited to environmental sensitive areas, but also projects located in areas with human rights and labour risks.

Classification system

7. Do you classify applications described in paragraph 8 of the Recommendation?

Yes

If yes, how do you classify such applications?

Using "A, B, C" Categories

Classification follows CA Annex 1 and is dependent on the specific environmental and social impacts of the project. Categorization also considers social and human rights impacts, including a range of social impacts not listed in annex 1. Projects can be classified as A or B on ground of social impact, even though they may have otherwise been categorized as C based on environmental impacts.

8. Do you classify applications described in paragraph 9 of the Recommendation?

Yes

If yes, how do you classify such applications?

Using "A, B, C" Categories

All projects are classified, including projects under 10 mil SDR and existing operations under 10 mil SDR. The same procedure is applied as in response to Q 7 above.

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III CLASSIFICATION

9. Do you have policies and procedures in place to identify the potential positive and negative environmental and social impacts relating to the applications to be classified?

If yes, please provide details, including any specific tools employed:

We identify potential environmental and social risks in all transactions, including those under 10 mil SDR, existing operations, and mobile units. The current procedure is being updated in order to better reflect today's practice. The tools and approaches used for identifying and assessing impacts include; sector specific environmental and human rights questionnaires, on-line review of negative media from both open source and subscription based sources, in-house assessments of country, regional and sector based human rights risks so as to gain understanding of context of projects operations, informal discussions with national and international network of civil society organisations (where relevant), use of third party consultants to conduct reviews of management systems with respect to labour rights and working conditions (where relevant), and conducting country and/or project specific site visits (where relevant).

Responsibility for classification

10. Who is responsible for the classification of applications?

Underwriter	<input checked="" type="checkbox"/>	Practitioner	<input checked="" type="checkbox"/>
ECA Consultant	<input type="checkbox"/>	Other (please specify)	<input type="checkbox"/>

The practitioners are responsible for classification of all projects under the scope of the CA. With respect to maritime projects/mobile units, the underwriter is responsible for initial screening and classifying Cat. "C" applications, following a written procedure designed by the practitioners and an internal list of approved shipyards based on GIEK and third party assessments; applications which are not easily classified as "C" are sent further to the practitioners for further review.

IV ENVIRONMENTAL AND SOCIAL REVIEW

Scope and criteria

11. (a) Do you have policies and procedures in place for reviewing projects when supporting exports forming only a minor part of a project [i.e. co-insuring / financing with another Export Credit Agency (ECA), Multilateral Financial Institution (MFI) or development agency] or in re-insurance situations?

If yes, please provide details, for example:

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

- (b) Any other comments:

We take into consideration the review conducted by our counterpart, but also conduct an independent review, albeit a lighter version of what we would normally conduct.

12. Do you have policies and procedures in place for assessing, where appropriate, the potential environmental and/or social impacts of any associated facilities?

If yes, please provide details:

There is currently no formal policy or procedure pertaining to associated facilities, but in practice this is always considered and is part of the initial screening questionnaires that are required to be submitted along with the application in all projects.

13. Do you have policies and procedures in place for considering, where appropriate, any statements or reports from your National Contact Point (NCP)?

If yes, please provide details:

We assess whether exporters or any associated partners in the project have been, or are currently under review by the Norwegian NCP. We have regular communications with the NCP to be updated on the status of on-going cases and cases we should be aware of being handled by other NCPS. We also share information about country, region, and sector specific information which the NCP may have that can be relevant for applications we are reviewing.

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Category A projects

14. Under paragraph 17 of the Recommendation, Members should require an Environmental and Social Impact Assessment (ESIA) 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 ESIA has not been undertaken or for which either an ESIA report is not available for review or does not adequately address all the issues set out in Annex II of the Recommendation?

Yes

If yes, please provide details, including the type of information that you would require in the absence of a (complete) ESIA:

We require an ESIA for all cat. A projects. There are situations where we require the ESIA to be re-done or updated in order for us to continue with the review, such as in cases where the ESIA is only conducted in accordance with local laws, where only an EIA is submitted (as opposed to an ESIA), where it is outdated, where relevant associated facilities have not been included in the scope of the ESIA, or where there are other significant gaps with the IFC PS standards.

Category B projects

15. The scope of a review for Category B projects may vary from project to project. Please provide details of your general approach to reviewing Category B projects, including the type of information required under your policies and procedures.

Depending on the impacts of the project, we may require an ESIA, however not as comprehensive in nature as for a Category A project; this is determined on a case-by-case basis. We do however require social and environmental information for all Cat B projects, which includes, where relevant, the following; documentation of assessments made by qualified professional with respect to range of environmental issues (biodiversity, flora and fauna, watersheds, discharges to air and water, national parks and other sensitive areas, etc.), information on management systems for environmental, social and health and safety, information on associated facilities, information about the labour force, resettlement, consultation and other impacts on affected communities, etc.

Responsibility for review

16. Who is responsible for undertaking the environmental and social review?

Underwriter

X

Practitioner

X

ECA Consultant

Other (please specify)

The practitioners are responsible for review of all projects under the scope of the CA. With respect to maritime projects/mobile units, the underwriter is responsible for initial classifying of Cat. "C" applications; applications which are not easily classified as "C" are send further to the practitioners for further review.

Standards for benchmarking projects

17. How do you seek assurance that a project is compliant with host country standards?

It is a requirement that projects comply with both host country standards and IFC PS; this is included as a condition for the guarantee. Applicants are to confirm that local legislation is followed, as well as document that all the required environmental permits have been obtained. Conditions are also included to notify GIEK of any environmental and social claims which may be raised during the life of the project.

18. Paragraphs 20-21 of the Recommendation set out the general circumstances in which various international standards should be used for the purposes of evaluating the potential environmental and social impacts of projects. Please provide details of when, in practice, you would use the following international standards:

(a) World Bank Safeguard Policies.

Never

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

All projects

(c) Multilateral Financial Institution (MFI) standards.

Other (please specify)

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(d) Any other comments:

IFC PS are applied to all land-based projects, including those under 10 mil SDR. The extent of the application of the IFC PS will however vary in relation to various factors, such as the size of the project, the context of the operations, extent of potential negative impacts, significance of ones share in the overall project, etc., as stipulated in the IFC PS. With respect to MFI standards, we have accepted EBRD standards, however would in any case conduct our own review, albeit a lighter version of what is normally conducted.

19. Do you have policies and procedures in place for dealing with cases where projects do not meet the international standards or guidelines against which they have been benchmarked?

☒ Yes

If yes, please provide details:

We do not support projects that have major gaps with the IFC PS. We do however acknowledge that in practice it is very uncommon that projects are fully in compliance with all aspects of the IFC PS at the time of granting support. The IFC approach is one of on-going improvement and monitoring, and thereby may require actions after granting support. A review of the quality and credibility of the project's environmental and social management plan is conducted, and compliance with the plan is included as a condition for support, along with regular monitoring reports where relevant. The same process is followed in situations where a Resettlement Action Plan, Biodiversity Action Plant, etc. is also required.

Site visits

20. Please specify the circumstances in which you might carry out a site visit as part of the review process.

- | | |
|---|---|
| (a) All projects <input type="checkbox"/> | (f) Project involves particularly complex/unusual potential impacts <input checked="" type="checkbox"/> |
| (b) Category A projects <input checked="" type="checkbox"/> | (g) Project located in or near sensitive area <input checked="" type="checkbox"/> |
| (c) Category A project finance transactions only <input type="checkbox"/> | (h) Project generating significant stakeholder interest <input checked="" type="checkbox"/> |
| (d) Category B projects <input checked="" type="checkbox"/> | (i) To verify project impact information provided <input checked="" type="checkbox"/> |
| (e) Project finance transactions <input type="checkbox"/> | (j) Other (please specify) <input checked="" type="checkbox"/> |

As a general rule; site visit for all Category A projects. Cat B projects and projects less than 10 mil SDR are considered on a case-by-case basis, and will depend on the potential impacts involved. We also conduct visits to shipyards constructing mobile units supported by GIEK.

V EVALUATION, DECISION AND MONITORING

Providing official support

21. Who is responsible for deciding whether to decline or provide official support and, in the event that support is to be provided, whether this should involve conditions to fulfil?

- | | |
|--|---|
| Underwriter <input type="checkbox"/> | Practitioner <input checked="" type="checkbox"/> |
| Senior ECA staff <input type="checkbox"/> | ECA committee / board <input checked="" type="checkbox"/> |
| Guardian Authority(ies) <input type="checkbox"/> | Other (please specify) <input type="checkbox"/> |

The practitioner provides their evaluation and recommendation, along with a list of possible covenants that are additional to the generally required covenants. The final decision is made by credit committee or board with advice from the practitioner.

22. (a) Under what circumstances would you consider denying support on account of the environmental and social impacts of a project? Please provide details.

Projects with major gaps with IFC PS or with unacceptable action plans to deal with gaps, Category A projects where the ESIA is not made available or where publication of ESIA information is not permitted by the project owner, projects where GIEKs involvement is small but the potential negative environmental or human rights impacts within the project are significant and we have no leverage to influence, projects which may have a high reputational risk to GIEK, projects located in non-self-governing territories as recognized by the UN and Norwegian Ministry of finance, etc..

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(b) Please provide any examples of experience.

Some examples: 1. Category A project in Africa where the ESIA for an associated facility was not made available to GIEK. 2. Project less than 10 mil SDR with impacts on indigenous people and biodiversity which was not in accordance with IFC PS. 3. Mobile units to be used within the exclusive economic zone of West Sahara (a non-self-governing territory).

Conditions to official support

23. (a) How are environmental and/or social conditions to be fulfilled prior to, or after, the final commitment for official support incorporated into documentation? Please provide details.

Conditions are incorporated into the policy agreement as conditions precedent and conditions subsequent. Discussions with the lending institution are conducted so that the conditions are reflected in the loan documentation.

(b) Please provide examples of any environmental and/or social conditions used.

General or standard conditions include; compliance with local law and IFC PS, establishment of environmental and social management systems in accordance with IFC PS, compliance with the project's ESMP, notification of environmental and social claims (ex. fatalities, labour strikes, etc.) reporting of deviations of ESMP, and right to site visit. More specific conditions are also included on a case-by-case basis, such as compliance with RAP or Biodiversity Action Plan, regular monitoring reports in accordance with ESMP, RAP, etc., reporting on major accidents or incidents and corrective actions, reporting on labour and working conditions, etc.

Monitoring

24. Do you have policies and procedures in place for monitoring, as appropriate, the implementation of a project to ensure compliance with the conditions of your official support?

Yes

If yes, please provide details:

(a) Types of projects:

- | | | | |
|--|-------------------------------------|--|-------------------------------------|
| (i) All projects | <input type="checkbox"/> | (vi) Project involves particularly complex/unusual potential impacts | <input checked="" type="checkbox"/> |
| (ii) Category A projects | <input checked="" type="checkbox"/> | (vii) Project located in or near sensitive area | <input checked="" type="checkbox"/> |
| (iii) Category A project finance transactions only | <input type="checkbox"/> | (viii) Project likely to generate significant stakeholder interest | <input checked="" type="checkbox"/> |
| (iv) Category B projects | <input checked="" type="checkbox"/> | (ix) To verify how impacts are being addressed | <input type="checkbox"/> |
| (v) Project finance transactions | <input type="checkbox"/> | (x) Where support is provided subject to certain conditions | <input type="checkbox"/> |
| (xi) Any other (please specify) | <input checked="" type="checkbox"/> | | |

We conduct follow-up monitoring at shipyards where Action Plans have been established and mitigation measures required prior to delivery of subsequent mobile units.

(b) Monitoring frequency/period:

(i) during construction: other (please specify)

(ii) during operation: other (please specify)

(c) Content:

Determined on a case-by-case basis. The content of monitoring may reflect key issues and milestones in the ESMP, or other risks which have been identified.

(d) Any other comments:

The frequency of monitoring will be determined on a case-by-case basis. It is however often linked to milestones and reporting requirements which are part of the ESMP. In general, the frequency for monitoring reports is more during the construction period (ex. quarterly) than in the operational period (ex. bi-annually).

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25. Who is responsible for undertaking monitoring of projects, including, if appropriate, making site visits, reviewing monitoring reports, deciding on compliance, etc?

Underwriter	<input type="checkbox"/>	Practitioner	<input checked="" type="checkbox"/>
ECA Consultant	<input checked="" type="checkbox"/>	Other (please specify):	<input type="checkbox"/>

The Practitioner has the primary responsibility for follow-up and assessing monitoring reports, conducting site visits and determining the level of compliance. For Category A projects, and some B, this is done in cooperation with a supervisory consultant which provides an independent assessment of compliance.

Non-compliance measures

26. (a) What actions are available to you in cases where monitoring reveals that conditions are not being complied with?

Agreements include remediation periods for non-compliances to be rectified in an appropriate timeframe. Failure to rectify within the agreed remediation period can lead to stoppage or delay of subsequent loan disbursements when approval of monitoring reports are tied to loan disbursements. If non-compliance is not corrected, it can lead to an event of default.

(b) Please provide any examples of experience.

In general, experience is that non-compliances are rectified within the agreed remediation period. There are some cases where this has not been possible for various practical reasons and therefore a renewed remediation period was established. In one case we have notified the bank and project developer that we will not approve subsequent loan disbursements as progress has not been made to comply with conditions within the agreed remediation period. In general, making loan disbursements tied to approval by the ECA of monitoring reports at key milestones of a project increases the likelihood that conditions set by the ECA are followed.

Disclosure of monitoring reports

27. (a) In what circumstances do you encourage project sponsors to make *ex post* monitoring reports and related information publicly available?

(i) All projects	<input type="checkbox"/>	(vi) Project involves particularly complex/unusual potential impacts	<input checked="" type="checkbox"/>
(ii) Category A projects	<input checked="" type="checkbox"/>	(vii) Project located in or near sensitive area	<input checked="" type="checkbox"/>
(iii) Category A project finance transactions only	<input type="checkbox"/>	(viii) Project likely to generate significant stakeholder interest	<input checked="" type="checkbox"/>
(iv) Category B projects	<input type="checkbox"/>	(ix) Where project not in compliance with support	<input type="checkbox"/>
(v) Project finance transactions	<input type="checkbox"/>	(x) None	<input type="checkbox"/>
(xi) Any other (please specify)	<input type="checkbox"/>		

Encourage but do not require.

(b) 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?

(i) All projects	<input type="checkbox"/>	(vi) Project involves particularly complex/unusual potential impacts	<input type="checkbox"/>
(ii) Category A projects	<input type="checkbox"/>	(vii) Project located in or near sensitive area	<input type="checkbox"/>
(iii) Category A project finance transactions only	<input type="checkbox"/>	(viii) Project likely to generate significant stakeholder interest	<input type="checkbox"/>
(iv) Category B projects	<input type="checkbox"/>	(ix) Where project not in compliance with support	<input type="checkbox"/>
(v) Project finance transactions	<input type="checkbox"/>	(x) None	<input checked="" type="checkbox"/>
(xi) Any other (please specify)	<input type="checkbox"/>		

We do not have a specific policy on this.

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VI EXCHANGE AND DISCLOSURE OF INFORMATION

Environmental and social procedural guidance

28. Have you published national ECA environmental and other related policy statements or principles and procedural guidance?

Exchanging information

29. Do you have policies and procedures in place for exchanging information with other ECAs and MFIs?

If yes, please provide details:

(a) co-insuring/co-financing situations:

Ad hoc informal exchanges (email, telephone, etc.) <input checked="" type="checkbox"/>	Ad hoc bilateral / multilateral meetings <input checked="" type="checkbox"/>
Practitioners' events <input checked="" type="checkbox"/>	Other (please specify) <input type="text"/>

No formal procedures, but in practice exchange of information is common, particularly projects with high risks of impacts.

(b) competitive situations:

Ad hoc informal exchanges (email, telephone, etc.) <input checked="" type="checkbox"/>	Ad hoc bilateral / multilateral meetings <input type="checkbox"/>
Practitioners' events <input type="checkbox"/>	Other (please specify) <input type="text"/>

No formal procedures, but in practice exchange of information is common, particularly projects with high risks of impacts.

Ex ante disclosure of project information

30. Please provide details of your policies and procedures for disclosing publicly information on Category A projects before a final commitment to grant official support, including:

(a) The scope and content of information released:

Project name <input checked="" type="checkbox"/>	Project location <input checked="" type="checkbox"/>
Description of exported goods/services and of the project <input checked="" type="checkbox"/>	Details of where additional information may be obtained <input checked="" type="checkbox"/>
Other (please specify) <input checked="" type="checkbox"/>	

ESIA and ESAP (and if relevant, a Resettlement Action Plan - RAP), to be made public on GIEK's website, or via a link to sponsor's website. Reason for classification, benchmarked standards, and considerations for monitoring may also be included.

(b) The language of the information released:

ECA language <input type="checkbox"/>	English <input checked="" type="checkbox"/>
Project language <input type="checkbox"/>	Other (please specify) <input type="text"/>

(c) Method of disclosure:

ECA website (please provide link below) <input checked="" type="checkbox"/>	Other (please specify) <input type="text"/>
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http://www.giek.no/en/om_giek/social-responsibility and
http://www.giek.no/en/slik_gjor_vi_det/guarantees_issued

(d) The minimum number of days the information should be made available prior to commitment: days

(e) Details of any circumstances in which project information relating to Category A projects is not disclosed prior to commitment:

Always publish information on Category A projects. In most cases information is made available well in advance of the 30 day minimum.

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Ex ante disclosure of environmental and social impact information

31. Please provide details of your policies and procedures for requiring that environmental and social impact information on Category A projects be made publicly available before a final commitment to grant official support, including

(a) Scope and content of information that should be released.

ESIA and ESAP (and if relevant, a Resettlement Action Plan - RAP), is to be published at least 30 days prior to final commitment.

(b) Language of the information released:

ECA language	<input checked="" type="checkbox"/>	English	<input checked="" type="checkbox"/>
Project language	<input type="checkbox"/>	Other (please specify)	<input type="checkbox"/>

We accept both English and Norwegian, but in practice receive it in English. In cases where it is in another language, we require it to be translated or that an executive summary be provided in English.

(c) Method of disclosure:

Disclosure of documents by ECA	<input checked="" type="checkbox"/>	Via link on ECA website to additional information	<input checked="" type="checkbox"/>
Other (please specify)	<input type="checkbox"/>		

(d) Minimum number of days the information should be made available prior to commitment: days

(e) Details of any circumstances in which environmental and social impact information relating to Category A projects is not disclosed prior to commitment.

Always publish ESIA/EIA for Category A projects. In most cases information is made available well in advance of the 30 day minimum. Failure to allow ESIA to be made public will delay or stop processing of application.

Ex post disclosure

32. Please provide details of your policies and procedures 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) Scope and content of information released:

(i) Project name	<input checked="" type="checkbox"/>	(x) Project location	<input checked="" type="checkbox"/>
(ii) Description of exported goods/services and of the project	<input checked="" type="checkbox"/>	(xi) Name of exporter	<input checked="" type="checkbox"/>
(iii) Name of buyer / project sponsor	<input checked="" type="checkbox"/>	(xii) Type of support	<input type="checkbox"/>
(iv) Repayment term	<input type="checkbox"/>	(xiii) Project credit volume	<input checked="" type="checkbox"/>
(v) Commitment date	<input type="checkbox"/>	(xiv) Category (A or B)	<input checked="" type="checkbox"/>
(vi) Reason for classification	<input checked="" type="checkbox"/>	(xv) Standards applied to the project	<input checked="" type="checkbox"/>
(vii) Key environmental and social factors / potential impacts	<input checked="" type="checkbox"/>	(xvi) Details of any conditions (including monitoring) applied	<input type="checkbox"/>
(viii) On-going monitoring reports	<input type="checkbox"/>	(xvii) GHG emissions of projects	<input type="checkbox"/>
(ix) Details of where additional information may be obtained	<input type="checkbox"/>	(xviii) Other (please specify)	<input checked="" type="checkbox"/>

The ESIA and ESAP for the project is also made available, either directly on the website or through a link to the project sponsor. This above applies for all Category A projects. For Cat B projects, ESIA is made public if it is available.

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(b) Language of the information released:

ECA language ☒ English ☒

Project language ☐ Other (please specify)

(c) Method of disclosure:

ECA website (please provide link below) ☒ Other (please specify)

http://www.giek.no/en/om_giek/social-responsibility and
http://www.giek.no/en/slik_gjor_vi_det/guarantees_issued

(d) How often *ex post* information on projects classified in Category A and Category B is made publicly available:

All Category A and B projects. General information on all policies issued by GIEK (including transactions outside of the scope of the Common Approaches, such as mobile units) are however made public on an on-going basis, and includes the following information; name of exporter, sector, date policy was issued, and guarantee sum.

(e) How long the information remains in the public domain:

ESIAs on Category A projects, and Cat. B projects where available, remain on website for at least 1 year. Information on past projects can be provided upon request.

(f) Details of any circumstances in which information on Category A and Category B projects is not disclosed after a final commitment is made:

ESIA and ESAP for all Category A projects are disclosed. There is also disclose of environmental and social information on Cat. B projects, including ESIA and ESAP where available.

33. Do you report and/or disclose publicly information on supported projects that do not meet the relevant aspects of the international standards against which they have been benchmarked?

If yes, please provide details:

Reported to the Working Group on Export Credits and Credit Guarantees (ECG) ☐ Disclosed publicly on ECA website ☐

Disclosed publicly on Guardian Authority's website ☐ Other (please specify)

Action plans and conditions are required in order to meet the standards of the IFC PS. Action Plans are made publically available.

VII REPORTING AND MONITORING OF THE RECOMMENDATION

Accountability of your guidelines

34. Do you have appropriate measures and mechanisms in place to ensure compliance with your policies and procedures?

If yes, please provide details, including (multiple answers may apply):

(i) ECA committee / board approvals ☒ (v) Guardian Authority(ies) approvals ☐

(ii) Internal audits ☒ (vi) Assurance provided by external parties ☒

(iii) Compliance Officer ☐ (vii) Complaint procedures ☒

(iv) Disclosure and reporting practices ☒ (viii) Other (please specify)

External auditing by PWC.

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Monitoring and evaluation

35. Do you have any policies and procedures in place for monitoring and evaluating your experience of the Recommendation at a national level?

No

If yes, please provide details:

Sharing information

36. Do you have policies and procedures in place for sharing experiences with other Members?

No

If yes, please provide details:

Ad hoc informal exchanges (email, telephone, etc.)

X

Ad hoc bilateral / multilateral meetings

X

Practitioners' events

X

Other (please specify)

There are no formal procedures for this, however in practice this is done on an ad hoc basis, as well as through regular meetings at the OECD and annual meeting of the Nordic ECAs.

Revisions of due diligence procedures

37. (a) When was the last review or update of your due diligence procedures conducted? (mm/yy)

08-2013

(b) What was the motivation for the last review or update of your due diligence procedures?

Better reflection of GIEK practice (as 2008 procedures were outdated), alignment with the updated 2012 OECD Common Approaches, and integration of the United Nations Guiding Principles on Business and Human Rights into the due diligence procedure. The procedure provides specific clarification with respect to: assessing and managing human rights due diligence and impacts, reviewing small transactions or transaction where we have limited leverage, associated facilities, reviewing mobile units/moveable assets (in both the construction and operational phase), to name a few points.

(c) Are any modifications foreseen in the near future?

Yes

If yes, please provide details:

Given the recent revision of our internal Policy and Procedures, no immediate modifications are foreseen at this point. If needed, alterations will however be made on an ad-hoc basis to reflect any possible changes in Norwegian policy, or recommendations which may come from the ECG with respect to GHG or human rights.

When ? (mm/yy)

12-2015

Resources

38. How many dedicated Practitioners work for your institution?

3

Reporting

39. How frequently do you report *ex post* to the ECG, in accordance with paragraph 41 of the Recommendation, all Category A and Category B projects for which a final commitment has been issued?

semi-annually

40. Do you produce any reports on environmental and social issues in addition to those required by the Recommendation?

Yes

If yes, please provide details:

For internal use only.

Additional measures

41. Have you adopted any additional measures for undertaking due diligence, consistent with the overall objectives of the Recommendation?

Yes

If yes, please provide details:

We identify potential risk in all of our transactions. With respect to human rights due diligence, we have sector specific questionnaires, conduct on-line media searches, analyze the country/region/sector context of the project, and at times have a third party review of management systems with respect to labour and working conditions. We also have standard covenants with respect to compliance with local laws and international standards, management systems, right to site visit, etc.

Environmental and Social Survey

REPORTING COUNTRY INFORMATION

ESS-NOR-GIEK (27-03-2015) version 3

Reporting Country **Norway**

Submission Date **27 March 2015**

Reporting Institution **GIEK**

Version number **3**

Applications not classified

42. Do you have policies and procedures in place for assessing the environmental and social risks associated with existing operations, including reviewing potential impacts and benchmarking against international standards? **Yes**

If yes, please provide details:

Deliveries to existing projects are normally classified in category C unless they contribute to major changes "in output or function" of the project itself or the buyer's operations. GIEK may, however, opt to classify such transactions in a higher class, or to reject the application, if the project in question is contributing to a severe degree of damage to society/social aspects and/or the environment. A discretionary assessment will be made of the Norwegian consignment's contribution in this respect.

43. Do you have policies and procedures in place for addressing environmental and social issues relating to exports of capital goods and/or services that are not destined to identified locations? **Yes**

If yes, please provide details:

We review maritime projects/mobile units. GIEK's current procedure on this is as follows: Mobile units with a long contract where the use location is fixed will be regarded as units "with an identified location" (as referred to in "Common Approaches"). They are therefore classified and assessed in accordance with the usual procedures described under A, B and C. In the case of other mobile units GIEK's assessment will often be restricted to the quality of the unit, measured against the general task the unit is intended to perform, if appropriate. They will also be classified in accordance with the above system, but there will be more variation in what is required in terms of assessment and the application of standards. As far as ships and rigs are concerned, the ship's class and classification society in particular, plus the ship owner's health and safety policy, will be assessed. In some cases it may also be necessary to take a closer look at the shipyard where the vessel/components is/are being built. Ships, however, are a broad category (covering everything from fishing boats to large offshore vessels), so there may be a need for discretionary assessments on a case-by-case basis

Applications not covered by the Recommendation

44. Do you have policies and procedures in place for addressing the environmental and social issues relating to exports of capital goods and/or services and the locations to which these are destined for officially supported export credits not covered by the scope of the Recommendation, *i.e.* with a repayment term of less than two years, for military equipment and agricultural commodities, for any applications exempt from screening as reported under Q3, etc.? **Yes**

If yes, please provide details:

For the past ca. 3 years we have reviewed maritime projects/mobile units. See answer to Q.43 above for more detail. We have gained experience with this and have updated our Policy and Procedure to incorporate review of mobile units as a standards practice, both in the construction and operation phase. With respect to transactions under 10 mill SDR, GIEK treats all projects that fall into GIEK's expanded definition of "sensitive project" in the same manner as project over 10 mill SDR. Sensitive projects includes projects located near sensitive areas, but also projects within particularly sensitive sectors, projects with potentially sensitive activities, or projects that cannot demonstrate systems for identifying and addressing negative human rights impacts. It is also part of the new policy to conduct due diligence, in line with our UNGP commitment, on all transactions, including lines of credit, long-term transactions with no fixed location, and short term transactions such as bond guarantees, and letters of credit

Additional comments

45. Please provide any additional comments.

On-going work is being conducted to implement GIEK's updated Policy and Procedure. This work includes; development of general human rights, social and environmental covenants to be utilized in all transactions, revision of GIEK's human rights and environmental screening questionnaires, establishment of sector specific guidance notes for underwriters and exports (ex. hydro power, thermal power, shipping/offshore oil & gas), and establishment of a stakeholder engagement strategy.