

# Environmental and Social Survey

## REPORTING COUNTRY INFORMATION

ESS-NOR-Eksportkreditt (27-03-2015) version 1

Reporting Country

Submission Date

Reporting Institution

Version number

## I GENERAL PRINCIPLES

### Objectives

- 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.

Export Credit Norway has developed policies and procedures to ascertain the compliance with the Recommendation. These are aligned with GIEK and we cooperate closely with them wrt. due diligence assessments of the transactions. A formal agreement of co-operation is signed with them, and when referring to practitioners in this survey that also includes the practitioners of GIEK. Information on environmental and social issues, questionnaires and discussions with the exporter and project sponsor on environmental and social requirements is used as the basis for the initial screening process. Additional measures may be taken to identify potential human rights impacts independent of information provided by the exporter and project sponsor. All approvals for financing are classified by practitioners. Additional considerations are implemented for land based projects under 10 mill SDR and vessels/mobile offshore units. Further review of environmental and social information, and request additional information/studies /gap analysis, etc. is done in close cooperation with GIEK. 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 credit committee/board with recommendations from the practitioners. Covenants requiring follow-up or monitoring are implemented in the loan documentation. Covenants may be decided with the advice from an independent supervisory consultant on a case by case basis. The ESIA for all Category A projects are made available on Eksportkreditt's webpage at least 30 days prior to granting support.

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

<http://www.eksportkreditt.no/en-GB/52ABOUT-EXPORT-CREDIT-NORWAY/CSR-Engelsk/>

## II SCREENING

### Exemptions

- Are all applications (apart from those related to military equipment and agricultural commodities) screened?

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 exceptions. Mobile units, such as ships and mobile offshore units, are also screened.

(d) details of any other exemptions from screening:

### Information requirements

- What information is required for the screening process?

Application form ☐ Separate environmental/social questionnaire ☒

Sector / issue-specific questionnaires (please specify) ☒ Other (please specify) ☐

A set of questions is built in to our internal transaction procedure and answered based upon information from the application, knowledge about the specific sector and any other available information. The questions are based on the same sector-specific questionnaires as used by GIEK. Depending on the transaction answer to further questions may be required.

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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"/>

The underwriter is responsible for the initial screening of all transactions with input from the practitioners as needed. All transactions are classified and the final classification is decided upon by the practitioners in cooperation with GIEK (GIEK participates in the Environmental Practitioners Group also on behalf of Eksportkreditt).

### 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. We may, however, opt to classify such transactions in a higher class, 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. Further assessment of this as needed.

### 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 the Common Approaches and is dependent on the specific environmental and social impacts of the project. Classification also takes into account social 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 transactions are classified, including contracts under 10 mill. SDR which are not in or near sensitive areas. The same procedure is applied as in response to Q7 above.

### 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?

Yes

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

On behalf of Eksportkreditt, GIEK identifies potential environmental and social risks in all transactions, including those under 10 mil SDR, existing operations, and mobile offshore units. 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 organizations (where relevant), use of third party consultants to conduct reviews of management systems with respect to labor rights and working conditions (where relevant), and conducting country and/or project specific site visits (where relevant).

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### 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 Common Approaches. With respect to vessels and mobile offshore units, the underwriters are responsible for initial screening and classifying category "C" transactions based upon a written internal procedure designed by the practitioners. Transactions which are not easily classified as "C" are forwarded to 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? Yes

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:

The review conducted by the other party/ies in the transaction is taken into consideration, but normally an independent review is also conducted based upon what the other party/ies have done.

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

If yes, please provide details:

There is currently no formal policy or procedure pertaining to associated facilities, but since all transactions are classified they are in practice always assessed.

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

If yes, please provide details:

We assess whether exporters or associated partners in the project have been or are currently under review by the Norwegian NCP. Regular contact with the NCP for updates on on-going projects.

### 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? No

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

An ESIA is required for all Category A projects. There are situations where the ESIA is required to be re-done or updated in order 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.

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### 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 an ESIA may be required. However it may be less comprehensive than for a cat. A project, this is determined on a case-by-case basis. Social and environmental information is required for all Category B projects, which may include, 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 labor force, resettlement, consultation and other impacts on affected communities.

### Responsibility for review

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

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

The practitioners are responsible for review of all projects under the scope of the Common Approaches. With respect to vessels and mobile offshore units, the underwriter is responsible for initial classifying of category "C" transactions. Applications which are not easily classified as "C" are send further to the practitioners for further review. For cat. A projects an external consultant is normally required.

### Standards for benchmarking projects

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

It is always a requirement that projects comply with all host country rules and regulations and this is included as a condition in the loan agreement. Applicants are to confirm that local legislation is followed, as well as document that all the required environmental permits have been obtained.

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)

(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 may accept these, but a review will be conducted albeit to a less extent than 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 will 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 financing along with regular monitoring reports where relevant. The same process is followed in situations where a Resettlement Action Plan, Biodiversity Action Plans, etc. is also required.

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### 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. Category B projects and projects of less than 10 mil SDR are considered on a case-by-case basis, and will depend on the potential impacts involved. Shipyards where vessels/mobile offshore units financed by Eksportkreditt are being constructed are also visited.**

### 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 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"/>           |

**Final decision made by the credit committee and eventually the board, with input from the responsible transaction team and advice from practitioners.**

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 the participation is limited but the potential negative environmental or human rights impacts within the project are significant and we have no leverage to influence, projects located in non-self-governing territories as recognized by the UN and Norwegian authorities.**

(b) Please provide any examples of experience.

**Export Credit Norway was only established in 2012 and has to date not denied any projects based upon the above.**

#### 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 initially outlined in the indicative offer for financing, then in the term sheet and finally detailed in the loan agreement. Conditions are incorporated as conditions precedent to signing/disbursement and conditions subsequent. Further follow-up are regulated as covenants, undertakings and representations during the life of the loan.**

(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, 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 Action Plans, regular monitoring reports in accordance with ESMP, RAP, etc., reporting on major accidents or incidents and corrective actions, reporting on labor and working conditions, etc.**

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### 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?

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 checked="" type="checkbox"/>          |
| (xi) Any other (please specify) <input checked="" type="checkbox"/>         |  |

**Follow-up and monitoring of shipyards where Action Plans have been established and mitigation measures required prior to delivery of subsequent vessels/mobile offshore units.**

(b) Monitoring frequency/period:

(i) during construction:  (ii) during operation:

(c) Content:

**Determined on a case by case basis. The content of the monitoring may reflect key issues and milestones of the Action Plan or other risks 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 Action Plan and implemented in the loan documentation. In general, the frequency for monitoring reports is higher during the construction period (ex. quarterly) than in the operational period (ex. bi-annually).**

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

Underwriter ☐ Practitioner ☒

ECA Consultant ☒ Other (please specify):

**The practitioner has the primary responsibility for follow-up and assessing monitoring reports, conducting site visits and determining the level of compliance. For cat. 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 stop 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.

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### 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 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"/> |  |                                     |

(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"/> |  |                                     |

**This may vary from project to project, we don't have any specific policy on this issue.**

## 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? Yes

### Exchanging information

29. Do you have policies and procedures in place for exchanging information with other ECAs and MFIs? No  
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="checkbox"/>            |

**No formal procedures, but in practice exchange of information is common, especially for projects associated with high risk impacts.**

(b) competitive 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="checkbox"/>            |

**No formal procedures, but in practice exchange of information is common, especially for projects associated with high risk impacts.**



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### 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 type="checkbox"/>		

(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="checkbox"/>

(c) Method of disclosure:

ECA website (please provide link below)	<input checked="" type="checkbox"/>	Other (please specify)	<input type="checkbox"/>
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<http://www.eksportkreditt.no/no/OM-EK/SAMFUNNSANSVAR1/Kategori-A-og-B-prosjekter1/>

(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.**

### 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 published at least 30 days prior to final commitment, ie signing of the loan agreement.**

(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"/>

**In general most information is received and available 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"/>		

**A summary of the ESIA will be available on Eksportkreditts website with link to where the full assessment and eventual additional information can be found.**

(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 publicly available 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.**



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### 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"/>

**For category A projects the ESIA and ESAP for the project is also made available, either directly on the website or through a link to the project sponsor. For category B if it is available.**

(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"/>

(c) Method of disclosure:

ECA website (please provide link below)	<input checked="" type="checkbox"/>	Other (please specify)	<input type="checkbox"/>
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<http://www.eksportkreditt.no/no/OM-EK/SAMFUNNSANSVAR1/Kategori-A-og-B-prosjekter1/>

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

**on-going basis**

**All cat. A projects. Not standard practice to systematically disclose information on cat. B projects.**

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

**indefinitely**

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

**None. All cat. A projects, and information on cat. B projects where available.**

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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? **No**

If yes, please provide details:

Reported to the Working Group on Export Credits and Credit Guarantees (ECG)	<input type="checkbox"/>	Disclosed publicly on ECA website	<input type="checkbox"/>
Disclosed publicly on Guardian Authority's website	<input type="checkbox"/>	Other (please specify)	<input type="checkbox"/>

**Action plans and conditions are required in order to meet the standards of the IFC PS. Action plans are made publicly 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? **Yes**

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

(i) ECA committee / board approvals	<input checked="" type="checkbox"/>	(v) Guardian Authority(ies) approvals	<input type="checkbox"/>
(ii) Internal audits	<input checked="" type="checkbox"/>	(vi) Assurance provided by external parties	<input checked="" type="checkbox"/>
(iii) Compliance Officer	<input type="checkbox"/>	(vii) Complaint procedures	<input type="checkbox"/>
(iv) Disclosure and reporting practices	<input checked="" type="checkbox"/>	(viii) Other (please specify)	<input type="checkbox"/>

**Internal auditing done by PWC.**

#### 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.)	<input checked="" type="checkbox"/>	Ad hoc bilateral / multilateral meetings	<input checked="" type="checkbox"/>
Practitioners' events	<input checked="" type="checkbox"/>	Other (please specify)	<input checked="" type="checkbox"/>

**There are no formal procedures established. However this is done on an ad-hoc basis. Eksportkreditt has also adopted the Equator Principles and participate in the EP Association Meetings.**

#### 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?

**Alignment with the updated 2012 OECD Common Approaches, and improved due diligence procedure in cooperation with GIEK. 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 vessels and mobile offshore units (in both the construction and operational phase).**

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

If yes, please provide details:

Alterations to procedures and policies will be made as needed, not immediately foreseen as of today. 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)

### Resources

38. How many dedicated Practitioners work for your institution?

### 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?

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

If yes, please provide details:

As member of the Equator Principles, we report to the EP Secretariat.

### Additional measures

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

If yes, please provide details:

We identify potential risk in all of our transactions. With respect to social due diligence, we request sector specific information, 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 labor 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.

### 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?

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. We may, however, opt to classify such transactions in a higher class 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.

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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:

Maritime projects such as ships and mobile offshore units are categorized and reviewed, as well as the yards where they are constructed. Mobile offshore units with a long contract where the location is defined 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. When the location is not known the 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. The vessel's or mobile offshore units class and classification society in particular, plus the owner's health and safety policy, will be assessed. Ships and mobile offshore units, however, are a broad category (Norwegian exporters covering everything from fishing boats to large offshore vessels and drilling rigs), 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:

Vessels and mobile offshore units are classified and reviewed. See answer to Q.43 above for more detail. We have gained experience with this and have updated our policy and procedures to incorporate review of mobile offshore units as a standards practice, both in the construction and operation phase. Transactions under 10 mill. SDR are also classified and particular attention is made to "sensitive projects" 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.

### Additional comments

45. Please provide any additional comments.

On-going work is being conducted in close cooperation with GIEK to implement and improve policies and procedures. This work includes; development of general human rights, social and environmental covenants to be utilized in all transactions, revision of information requirements to be provided with the applications and establishment of sector specific guidance notes for underwriters. In addition, Eksportkreditt has adopted the Equator Principles. The Equator Principles is a risk management framework, adopted by financial institutions, for determining, assessing and managing environmental and social risk in projects and is primarily intended to provide a minimum standard for due diligence to support responsible decision-making.