CHECKLIST FOR ENVIRONMENTAL AND SOCIAL REVIEW OF TRANSACTIONS

1 Aim

This is an Export Finance Australia tool used by the Director Environmental and Technical Review for confirming that the Procedure for environmental and social review of transactions was implemented. It is through the Procedure that Export Finance Australia's Policy for environmental and social review of transactions is applied.

This checklist aims are to:

- ensure consistent application of the Policy and Procedure.
- aid external reviewers.

Completed checklists for transactions are not made public.

This checklist does not apply to transactions where a general facility review is applicable or transactions assessed by use of the SBEL or SME environmental and social screen as those transactions are, by definition, determined to have low environmental and/or social risk. Only relevant sections of this template are required for the completed checklist. Sections may be removed from the template if not needed.

2 Transaction information

2.1 Request Description

Information matching the opportunity details from INFOR submitted as part of a Request for Tech, E&S Review.

Client:				
Transaction name:				
Is Facility?	New: 🗆	Existing: 🗆		Renewal: 🗆
Facility type:				
Supply chain transaction?	Yes 🗆		No 🗆	
Transaction value:				
Industry sector:				
Country location of transaction or project:				
Known export destinations (as provided in INFOR/EXFOS):				

Other transaction information

Information provided or relevant to the transaction that supported the review.

Transaction description:			
Global Approaches	For reporting purposes, nominate which Global Approaches apply to the transaction:		
	Common Approaches	Equator Principles	
Modern Slavery Statement	Yes 🗆	No 🗆	
Required:	Required when annual revenue greater than \$100million.		
Military Equipment:	Yes 🗆	No 🗆	

	If yes , the review is completed in line with the Military Policy.	
Energy Efficiency Related:		
Main references reviewed:		
Client discussions /		
meetings / site visit:		

2.2 Screening and Classification

Provide a ✓ where appropriate within the tables and complete all relevant sections for the transaction.

A new project or an existing project undergoing material change	Go to section 2.2.1
Associated with an existing project	
Non-project	Go to section 2.2.3
Bond	

2.2.1 Applicable Environmental and/or Social Standards, Policies and Management Systems

Provide a where appropriate within the tables and complete	te all relevant sections for the transaction.
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Environmental and/or social information	Yes	No	Unknown	Not Relevant
Which standard is the project designed to comply with?				
Host country				
Is the host country an EP Designated country?				
IFC Performance Standards				
 World Bank EHS Guideline, or Sector Guideline 				
Australian				
Other				
If the standard used is not the IFC Performance Standard, is it equivalent to or more stringent?				
Located in or adjacent to a sensitive area (see Procedure Glossary of terms)?				
Environmental &/or Social Policies:				
Export Finance Australia client				
Project sponsor				
Management systems applicable:				
Export Finance Australia client				
Project sponsor				
Management plans applicable				
Export Finance Australia client				
Project sponsor				
Other:				
Environmental and social impact assessment documentation available?				
Independent adviser reports available?				

If other key information sources were used these should be described in the review document. That information may include information from others such as affected communities, civil society organisations, and the Australian public, etc.

For SME transactions using the checklist as the review, relevant information is either contained in the transaction folder,

Infor or listed below.

For other transactions using the checklist is not intended to repeat all the review information. The full review can be found in the Technical, Environmental and Social Review Report. Supporting information is either contained in the transaction folder, Infor or referenced in the Full Report.

2.2.2 New project categorising screening

The categorisation should consider the definitions provided in the Export Finance Australia Procedure.

Indicate where there may be a potential for environmental and social impact relating to the Project.

Provide a ✓ where appropriate within the tables and complete all relevant sections for the transaction.

	Potential Impacts		evant	Comment where the potential	
	Polential impacts	Y	N	impacts are relevant to Categorisation	
Environmental	Air emissions (i.e. generation of significant air emission, including GHG).				
	Waste (i.e. generation of effluents, waste, hazardous waste, wastewater).				
	Noise and vibration.				
	Significant use of natural resources.				
	Impacts on endangered species.				
	Located in or near sensitive areas.				
Social	Labour and working conditions.				
	Community health, safety, and security.				
	Land acquisition and involuntary resettlement.				
	Indigenous peoples, cultural heritage				
	Project-related human rights impacts, including forced labour, child labour and life-threatening occupational health and safety situations.				
Other	Overseas Infrastructure Project related to 5G communications networks or communications technology.				

Based on available information, and where all answers are **No**, then the new Project has minimal to no potential for adverse environmental or social impacts, no further action is required, and the transaction is a **Category C** Project.

Category A	Go to Part 4, Part 5 and Part 6
Category B	Go to Part 4 and Part 6
Category C	Go to Part 3

Guidance for determining the category was obtained from:

Category guidance used	Yes	No	Not relevant
Category definitions (E&S Procedure)			
OECD Common Approaches Annex 1			

Category guidance used	Yes	No	Not relevant
Other			

For all other projects, further review is required to determine the categorisation. Provide a summary of the transaction's categorisation rationale below:

2.2.3 Existing project, non-project or bond

The Screen in Attachment 1 provides a guide for the need for further analysis and in which specific area.

Based on available information, if a non-project transaction is not identified under the screen in Attachment 1 as "may have potential environmental and social impact", no further action is required, and the transaction has **LOW POTENTIAL – NON-PROJECT OR BOND** for environmental and social risk.

Transaction with low potential for environmental and/or social impact		Go to Part 3
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If a non-project transaction is identified under the screen as "may have potential environmental and social impact", the transaction should be further assessed to determine the potential risk. Note that this review could still lead to the conclusion that a transaction has **Low Potential** for environmental and social impacts.

Transaction with low potential for environmental and/or social impact	Go to Part 3
Transaction with potential for environmental and/or social impact	Go to Part 4

Provide a summary of the rationale for determining the transaction's level of potential environmental and/or social impact below (with supporting information contained in the transaction folder and Infor):

3 Consideration

Category C	
Low Potential – non-project or bond	
Military Equipment	

Environmental and/or social risk evaluation report prepared:

By:

Date:

Approval for this type of transaction is made in accordance with Board delegated credit approvals.

The review for this transaction is now complete.

For non-project transactions see Attachment 1 for Screening used.

4 **Risk evaluation**

4.1 Transaction associated with Category A or B project or a transaction with potential for impact.

Export Finance Australia's usual benchmark is the IFC Performance Standards. Indicate which Performance Standards were relevant for the project risk evaluation in the Table below. Attachment 3 and 4 provides additional guidance for the risk evaluation. The risk evaluation report should consider each relevant Performance Standard.

Provide a ✓ where appropriate within the tables and complete all relevant sections for the transaction.

Pe	rformance Standard	Relevant	Not relevant
1	Assessment and Management of Social & Environmental Risks and Impacts		
2	Labour and Working Conditions		
3	Resource Efficiency and Pollution Prevention		
4	Community Health, Safety, and Security		
5	Land Acquisition and Involuntary Resettlement		
6	Biodiversity Conservation and Sustainable Management of Living Natural Resources		
7	Indigenous Peoples		
8	Cultural Heritage		

Арр	pointment of an IESC	Yes	No	Comments
1	Has an Independent E&S Consultant (IESC) been appointed to the project?			
2	Has an E&S Action Plan (ESAP) been prepared to address gaps in the Project's compliance with the applicable E&S standards?			

List any World Bank EHS Guidelines used in the risk evaluation:

List any other guidelines used in the risk evaluation:

If an alternate benchmark was used identify and describe below:

Benchmarking may identify a need for further studies, many of which can be required as conditions of support. Some factors, those involving human rights, may require further work prior to making a decision and the Performance Standard benchmarking should generally identify the need for such work.

Some additional factors to consider are presented in the following table:

Characteristic	Rele	vant?	Adequately addressed in Project Documentation?		
	Yes	No	Yes	No	
Export Finance Australia's Country Risk Assessment identifies human rights issues relevant to the transaction					
Located in a conflict or post conflict area					
Large-scale influx of workers					

Characteristic	Rele	vant?	Adequately addressed in Project Documentation?		
	Yes	No	Yes	No	
Use of armed security or a security force not managed by the project sponsor					
Host country with any of the following characteristics:large migrant workforcedocumented repression of minorities					

Additional assessment is required when:

- a "Yes" response is provided to any characteristic and the issue is not adequately addressed in the project documentation, or
- Export Finance Australia's due diligence identifies human rights concerns that are not adequately addressed in the project documentation.

The additional assessment must address the identified risks, including any adversely affected human rights.

Note for transactions which have completed a review under Part 4, provide commentary in Section 2.3, with supporting information contained in the transaction folder and Infor.

5 Disclosure

Export Finance Australia's potential involvement must be disclosed for all Category A projects (refer to Procedure for environmental and social review of transactions, Section 2.2.3).

6 Consideration

Category A	
Category B	
Potential Impacts – non project or bond	

Approvals necessary are summarised below:

Criterion	Approval required
Transaction associated with a Category A New Project not located in Australia and a value greater than SDR 10 million	Board
Transaction associated with a Category A New Project located in Australia	Board delegated approval to the Managing Director for transactions with a value less than A\$50 million. Above A\$50 million are subject to Board approval.
All other transactions	Made in accordance with Board delegated credit approvals.

Environmental and/or social risk evaluation report prepared:

By:

Date:

For all Category A and B transactions, an E&S Certificate of Currency shall be completed prior to signing of the transaction.

The review for this transaction is now complete.

7 Checklist amendments

Checklist version	Date and details
20 July 2011	Implementation following Checklist approval by the Executive and legal review
30 August 2012	Classification rationale summary added to section 2.3.1.
12 March 2013	Update following Policy/Procedure audit
27 June 2013	Amendments following the release of Equator Principles 3 (June 4 2013) and a decision to disclose Export Finance Australia's potential involvement in Category A projects located in Australia.
19 January 2016	Amendments following Procedure update of August 2015 and general housekeeping edits.
19 December 2018	Amendments to screen to match amendments to SME screen.
5 August 2019	Defined Considerations in line with Infor system inputs. Changed text Efic to Export Finance Australia
5 November 2019	Amendments to screen, additional detail provided within section 2.3.2 and explanatory guidance in attachment 2 and 3.
24 June 2021	Added further details in Section 2.3.1 for the screening and categorisation of Projects.
15 February 2022	Update to reflect minor amendments to the Policy and Procedure.
20 June 2022	Minor edits to improve process flow.
4 April 2023	Addition of Modern Slavery Statement requirement.
30 June 2023	Updated to reflect refined review process flow.
05 February 2024	Updated to address observations from the Assurance Audit

ATTACHMENT 1 Non-Project Screen

Use of the screen criteria by a Director, Environmental & Technical Review for non-projects to guide assessment. Attachment 2 provides additional explanation behind the screen.

	Yes	No	N/A	Reason/Standard/source/ further comments
Step 1 – Australian Goods and Services				
The goods and/or services are substantially produced and exported from Australia?				
 If "YES", proceed to step 2. If "NO", then the transaction may have potential¹ environmental and social impact, proceed to step 2 				
Step 2 – Australian Supply Chain or Tourism				
Is the transaction part of an Australian supply chain (i.e. used at an Australian project or delivered to an exporter based in Australia) or is it a tourism transaction?				
If "YES", proceed to step 6.If "NO", proceed to step 3.				
Step 3 – Existing Project or Known Destination				
Does the Director know the ultimate destination of the export? i.e. does the Director know the location of the associated project, commercial, industrial or infrastructure undertaking to which the export is destined?				
Proceed to step 4.				
Step 4 – Country Screening				
Is the project to which the goods or services are ultimately to be exported located in an EP designated country ² ?				
Proceed to step 5.				
Step 5 – Industry and Sector Screening				
Are the goods or services related (i.e. destined for that sector) to an industry sector ³ listed below?				

¹ Note the transaction requires further assessment to determine the potential for risk.

² List of countries as defined by the Equator Principles as those countries deemed to have robust environmental and social governance, legislation systems and institutional capacity designed to protect their people and the natural environment (<u>https://equator-principles.com/designated-countries/</u>).

³ Risk sectors are chosen based on the projects/activities listed as Category A Projects in ANNEX I of the Common Approaches (<u>http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?doclanguage=en&cote=tad/ecg(2016)3</u>).

	Yes	No	N/A	Reason/Standard/source/ further comments
 If "YES", then the transaction may have potential environmental and social impact, proceed to step 6. If "NO", proceed to step 6. 				
Communications or communications technology				
Chemical manufacturing				
Clothing and footwear manufacturing				
Dams for water supply or hydro power				
Live animal exporting or animal farming				
Mining and smelting				
Oil and gas				
Non-Renewable Power generation				
Pulp and paper manufacturing				
Security forces, private and/or state				
Waste processing or disposal of hazardous wastes				
Step 6 – Human Rights including Modern Slavery				
Does the country, sector, specific industry or company have credible evidence of human rights issues or modern slavery?				
 If "YES", then the transaction may have potential environmental and social impact. 				

Screening Results

If a transaction is not identified under the screen above as "may have potential environmental and social impact", no further action is required, and the transaction has **LOW POTENTIAL – NON-PROJECT OR BOND** for environmental and social risk. Commentary to this effect to be provided in section 2.3.2.

If a transaction is identified under the screen above as "may have potential environmental and social impact", the transaction should be further assessed to determine the potential risk. Note that this review could still lead to the conclusion that a transaction has **Low Potential** for environmental and social impacts. Commentary on the final determination to be provided in section 2.3.2, with supporting information contained in the transaction folderand Infor. Where Export Finance Australia is supporting an SME whose export is a minor component of a larger undertaking, the export is likely to have low potential for environmental and social impacts due to association with the larger undertaking).

ATTACHMENT 2 Explanatory Guidance for Non-Project Transactions

Step 1 – Australian Goods and Services

The goods and/or services are produced in and exported from Australia (i.e. manufactured in Australia or the services are provided from Australia). Australian businesses are subject to robust environmental and social governance, legislative systems and institutional capacity, as such are considered low potential.

Step 2 – Australian Supply Chain or Tourism

As the transaction is Australian domiciled, subject to Step 6, it has low potential.

Step 3 – Existing Project or non-project but Known Destination

This question addresses whether the transaction is associated with an existing project or the ultimate destination of the commercial, industrial or infrastructure undertaking is in a known location.

Step 4 – Country Screening

The destination of the export is known and if that location is a designated country, then absent other information to the contrary, the transaction has low potential for environment and social impact.

List of countries as defined by the Equator Principles as those countries deemed to have robust environmental and social governance, legislation systems and institutional capacity designed to protect their people and the natural environment (<u>https://equator-principles.com/designated-countries/</u>). Designated Countries are:

Australia, Austria, Belgium, Canada, Chile, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Israel, Italy, Japan, Korea, Latvia, Lithuania, Luxembourg, Netherlands, New Zealand, Norway, Poland, Portugal, Slovak Republic, Slovenia, Spain, Sweden, Switzerland, United Kingdom, United States

Step 5 – Industry and Sector Screening

The sector/industry list is an amalgamation of business or project types into Sectors that are known to have the potential for environmental and/or social impacts or are based on the projects/activities listed as Category A Projects in ANNEX I of the Common Approaches

(http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?doclanguage=en&cote=tad/ecg(2016)3).

Step 6 – Human Rights including Modern Slavery Screening

Search country, sector, specific industry or company for identified human rights issues. If any human rights issue is identified via online searches, then undertake an appropriate assessment (websites to assist: https://www.globalslaveryindex.org/ or https://www.amnesty.org/en/ or https://www.amnesty.org/en/<

ATTACHMENT 3 Risk Evaluation Guidance

For a (i) *project or (ii) existing project, non-project or bond with* **potential** *for environmental and/or social impact* subject to risk evaluation under Section 4. The following questions / guidance may assist the Director Environmental & Technical Review to determine the risk of the potential environmental and or social impacts in identified risk areas.

Aaraat		vant?	Reason/Standard/source/
Aspect	Yes	No	further comments
PS1 Assessment and Management of Social & Environmental Risks and Impacts			
Project Impact Assessment			PS1
Is there an environmental and social impact assessment for the Project?			
Project Management and Monitoring			PS1
Is there a plan for management and monitoring potential negative environmental and or social impacts?			
Use of hazardous substances			PS1
What hazardous substances are used in the goods or product?			
What are the hazardous substances estimated yearly consumption?			
PS2 Labour and Working Conditions			
Modern Slavery			PS2
Does the project identify its human right and modern slavery risk in the direct operations and supply chain?			
Displacement of, or damage to, existing industry or agriculture			PS2
Are alternative jobs including appropriate training being offered?			
What groups of the society have been consulted?			
Job losses among the local population			
Are job losses expected to arise as a result of the project?			
What opportunities for re-employment or re-training are being provided?			
PS3 Resource Efficiency and Pollution Prevention			
Water pollution or extraction			PS3

Access		vant?	Reason/Standard/source/
Aspect	Yes	No	further comments
Is the consumption of water or disposal of liquid effluent likely to impact on other users or environments?			
How much water will be required and where will it come from?			
How much effluent will be generated? What are the contaminants of the effluent and their concentrations?			
Local air quality			PS3
Do the goods or project produce dust or fumes? Are the sources and levels of emissions known?			
What mitigation systems will be installed?			
Climate change			PS3
What quantities of greenhouse gases will be produced? Scope 1 & 2			
What alternatives were considered to the production of greenhouse gases?			
Potential Physical impacts on project due to climate change?			
Production of damaging or toxic waste			PS3
What quantities of solid waste and secondary products are produced?			
What damaging or toxic substances are contained in the waste and in what quantities are they presented?			
What mitigation procedures have been implemented to minimise production of waste? Are measures designed for safe storage and/or disposal of waste?			
PS4 Community Health, Safety, and Security			
Noise pollution			PS4
What noise levels are expected from the process/project?			
What is the distance to closest residential/sensitive area?			
What are any mitigation measures been made proposed to reduce noise?			
PS5 Land Acquisition and Involuntary Resettlement			

	Relevant?		Reason/Standard/source/ further comments
Aspect		No	
Resettlement of the local population			PS5
Are people being moved from or excluded from the site of the project, particularly on an involuntary basis?			
How many are involved?			
How long have they lived or worked on the site?			
What is the source of this data and how reliable is it?			
Compulsory acquisition of land			PS5
Is land being acquired by or on behalf of the project company through compulsory purchase systems?			
How and by whom are the assets and resources base being valued?			
Are current inhabitants/users being offered alternative land or cash or both?			
PS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources			
Damage to wildlife or habitats			PS6
Is a change of land use necessary e.g. agricultural to industrial or mining?			
Does the project involve the clearance of land?			
What is the present use of land?			
Are any compensating offsets planned e.g. provision of greenbelt areas?			
Degradation of land (e.g. soil contamination, erosion, salinisation)			PS6
What steps will be taken to ensure that land degradation is avoided, e.g. bunding of tanks and other measures to prevent spillage?			
What plans are there or site restoration after the project has closed?			
PS7 Indigenous Peoples			
Impact on minority or vulnerable communities			PS7

Acrost	Relevant?		Reason/Standard/source/ further comments
Aspect		No	
Does the project have a disproportionate effect on national, ethnic or religious minority communities or other vulnerable groups in the country concerned?			
PS8 Cultural Heritage			
Damage to sites of cultural, historic, religious or scientific interest			PS8
Does the project affect important sites?			
Is the site near to a recognised World Heritage site?			
Is the site situated on or near to a sensitive area?			

EXAMPLES OF TRANSACTION CHARACTERISTICS*	ASSESSMENT	LIKELY E&S RISK RANGE	RESULT
 ESIA publicly available MLFI(s) are supporting the Project Project located in a Designated country No adverse information from internet search Not in a sensitive area Not an industry sector of potential concern No Modern Slavery risk 	Satisfies Export Finance's benchmark	LOW to MODERATE	Transaction subject to normal delegations.
 Aware that an ESIA exists, but not available to Export Finance (either publicly or through client) Support provided by other OECD ECAs or EPFI's No adverse information from internet searches Not in a sensitive area Country where E&S standards are legislated with acceptable implementation 	Likely to meet Export Finance's benchmark but only indirect information available to support this view.	LOW to HIGH	If risk LOW or MODERATE transaction subject to normal delegations. Refer to Export Finance Executive if risk greater than MODERATE.
 Aware that an ESIA exists, but not available to Export Finance (either publicly or through client) No other EPFI, MLFI or OECD ECAs involved Not in a Designated country Country where E&S standards are legislated but poor implementation Limited adverse information from internet search Not in a sensitive area 	 Lack of information limits E&S assessment. Unlikely to meet Export Finance's benchmark 	HIGH to EXTREME.	Refer to Export Finance Executive.
 No evidence that an ESIA was prepared No other EPFI, MLFI or OECD ECAs involved Not in a Designated country Country where little E&S legislation exists Adverse information from internet search and CSO/NGO negative reports Project located in a sensitive area 	Cannot meet Export Finance's benchmark	EXTREME	Refer to Export Finance Executive.

ATTACHMENT 4: Examples of E&S RISK Indicators for transaction with Potential for E&S Impacts.

* Not all the listed examples need to apply to a transaction