

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. f

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: <input type="checkbox"/>	Existing: <input type="checkbox"/>	Renewal: <input type="checkbox"/>
Facility type:			
Supply chain transaction?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Transaction value:			
Industry sector:			
Location of transaction or ultimate export and/or, where relevant, project location:			

Other transaction information

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

Transaction description:		
Military Equipment:	Yes <input type="checkbox"/> If yes , the review is completed in line with the Military Policy.	No <input type="checkbox"/>
Fossil Fuel Related:		
Main references reviewed:		
Client discussions /		

meetings / site visit:	
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2.2 Environmental and/or Social Applicable Standards, Policies and Management Systems

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

Environmental and/or social information	Yes	No	Unknown	Not Relevant
Which standard is the project designed to comply with?				
• Host 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 on the “G” drive, 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 on the “G” drive, Infor or referenced in the Full Report.

2.3 Screening and categorisation

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 2.3.1
Associated with an existing project		Go to section 2.3.2
Non-project		
Bond		

2.3.1 New project

Project categorisation 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		Relevant	
		Y	N
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			
Other			

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

2.3.2 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 on the “G” drive 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.

Remove Sections 4 to 6 of the checklist, when they are no longer needed.

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.

Performance 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		

Performance Standard	Relevant	Not relevant
5 Land Acquisition and Involuntary Resettlement		
6 Biodiversity Conservation and Sustainable Management of Living Natural Resources		
7 Indigenous Peoples		
8 Cultural Heritage		

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	Relevant?		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				
Use of armed security or a security force not managed by the project sponsor				
Host country with any of the following characteristics: <ul style="list-style-type: none"> • large migrant workforce • documented 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 on the “G” drive 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: _____

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.

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
<p>Step 1 – Australian Goods and Services</p> <p>The goods and/or services are substantially produced and exported from Australia?</p> <ul style="list-style-type: none"> • If “YES”, proceed to step 2. • If “NO”, then the transaction may have potential¹ environmental and social impact, proceed to step 2 	<input type="checkbox"/>	<input type="checkbox"/>		
<p>Step 2 – Australian Supply Chain or Tourism</p> <p>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?</p> <ul style="list-style-type: none"> • If “YES”, proceed to step 6. • If “NO”, proceed to step 3. 	<input type="checkbox"/>	<input type="checkbox"/>		
<p>Step 3 – Existing Project or Known Destination</p> <p>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?</p> <ul style="list-style-type: none"> • Proceed to step 4. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>Step 4 – Country Screening</p> <p>Is the project to which the goods or services are ultimately to be exported located in an EP designated country²?</p> <ul style="list-style-type: none"> • Proceed to step 5. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>Step 5 – Industry and Sector Screening</p> <p>Are the goods or services related (i.e. destined for that sector) to an industry sector³ listed below?</p> <ul style="list-style-type: none"> • If “YES”, then the transaction may have potential environmental and social impact, proceed to step 6. • If “NO”, proceed to step 6. 			<input type="checkbox"/>	

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 (<https://equator-principles.com/designated-countries/>).

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

	Yes	No	N/A	Reason/Standard/source/ further comments
Communications or communications technology	<input type="checkbox"/>	<input type="checkbox"/>		
Chemical manufacturing	<input type="checkbox"/>	<input type="checkbox"/>		
Clothing and footwear manufacturing	<input type="checkbox"/>	<input type="checkbox"/>		
Dams for water supply or hydro power	<input type="checkbox"/>	<input type="checkbox"/>		
Live animal exporting or animal farming	<input type="checkbox"/>	<input type="checkbox"/>		
Mining and smelting	<input type="checkbox"/>	<input type="checkbox"/>		
Oil and gas	<input type="checkbox"/>	<input type="checkbox"/>		
Non-Renewable Power generation	<input type="checkbox"/>	<input type="checkbox"/>		
Pulp and paper manufacturing	<input type="checkbox"/>	<input type="checkbox"/>		
Security forces, private and/or state	<input type="checkbox"/>	<input type="checkbox"/>		
Waste processing or disposal of hazardous wastes	<input type="checkbox"/>	<input type="checkbox"/>		
<p>Step 6 – Human Rights including Modern Slavery</p> <p>Does the country, sector, specific industry or company have credible evidence of human rights issues or modern slavery?</p> <ul style="list-style-type: none"> If “YES”, then the transaction may have potential environmental and social impact. 	<input type="checkbox"/>	<input type="checkbox"/>		

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 folder on the “G” drive and 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 (but could give rise to reputation risks 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 (<https://equator-principles.com/designated-countries/>). 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](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.globallslaveryindex.org/> or <https://www.hrw.org/> or <https://www.amnesty.org/en/> or <https://www.ohchr.org/EN/Pages/Home.aspx>).

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.

Aspect	Relevant?		Reason/Standard/source/ further comments
	Yes	No	
PS1 Assessment and Management of Social & Environmental Risks and Impacts	<input type="checkbox"/>	<input type="checkbox"/>	
Project Impact Assessment	<input type="checkbox"/>	<input type="checkbox"/>	PS1
Is there an environmental and social impact assessment for the Project?	<input type="checkbox"/>	<input type="checkbox"/>	
Project Management and Monitoring	<input type="checkbox"/>	<input type="checkbox"/>	PS1
Is there a plan for management and monitoring potential negative environmental and or social impacts?	<input type="checkbox"/>	<input type="checkbox"/>	

Aspect	Relevant?		Reason/Standard/source/ further comments
	Yes	No	
Use of hazardous substances	<input type="checkbox"/>	<input type="checkbox"/>	PS1
What hazardous substances are used in the goods or product?	<input type="checkbox"/>	<input type="checkbox"/>	
What are the hazardous substances estimated yearly consumption?	<input type="checkbox"/>	<input type="checkbox"/>	
PS2 Labour and Working Conditions	<input type="checkbox"/>	<input type="checkbox"/>	
Modern Slavery	<input type="checkbox"/>	<input type="checkbox"/>	PS2
Does the project identify its human right and modern slavery risk in the direct operations and supply chain?	<input type="checkbox"/>	<input type="checkbox"/>	
Displacement of, or damage to, existing industry or agriculture	<input type="checkbox"/>	<input type="checkbox"/>	PS2
Are alternative jobs including appropriate training being offered?	<input type="checkbox"/>	<input type="checkbox"/>	
What groups of the society have been consulted?	<input type="checkbox"/>	<input type="checkbox"/>	
Job losses among the local population	<input type="checkbox"/>	<input type="checkbox"/>	
Are job losses expected to arise as a result of the project?	<input type="checkbox"/>	<input type="checkbox"/>	
What opportunities for re-employment or re-training are being provided?	<input type="checkbox"/>	<input type="checkbox"/>	
PS3 Resource Efficiency and Pollution Prevention	<input type="checkbox"/>	<input type="checkbox"/>	
Water pollution or extraction	<input type="checkbox"/>	<input type="checkbox"/>	PS3
Is the consumption of water or disposal of liquid effluent likely to impact on other users or environments?	<input type="checkbox"/>	<input type="checkbox"/>	
How much water will be required and where will it come from?	<input type="checkbox"/>	<input type="checkbox"/>	
How much effluent will be generated? What are the contaminants of the effluent and their concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	
Local air quality	<input type="checkbox"/>	<input type="checkbox"/>	PS3
Do the goods or project produce dust or fumes? Are the sources and levels of emissions known?	<input type="checkbox"/>	<input type="checkbox"/>	
What mitigation systems will be installed?	<input type="checkbox"/>	<input type="checkbox"/>	
Climate change	<input type="checkbox"/>	<input type="checkbox"/>	PS3

Aspect	Relevant?		Reason/Standard/source/ further comments
	Yes	No	
What quantities of greenhouse gases will be produced? Scope 1 & 2	<input type="checkbox"/>	<input type="checkbox"/>	
What alternatives were considered to the production of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	
Potential Physical impacts on project due to climate change?	<input type="checkbox"/>	<input type="checkbox"/>	
Production of damaging or toxic waste	<input type="checkbox"/>	<input type="checkbox"/>	PS3
What quantities of solid waste and secondary products are produced?	<input type="checkbox"/>	<input type="checkbox"/>	
What damaging or toxic substances are contained in the waste and in what quantities are they presented?	<input type="checkbox"/>	<input type="checkbox"/>	
What mitigation procedures have been implemented to minimise production of waste? Are measures designed for safe storage and/or disposal of waste?	<input type="checkbox"/>	<input type="checkbox"/>	
PS4 Community Health, Safety, and Security	<input type="checkbox"/>	<input type="checkbox"/>	
Noise pollution	<input type="checkbox"/>	<input type="checkbox"/>	PS4
What noise levels are expected from the process/project?	<input type="checkbox"/>	<input type="checkbox"/>	
What is the distance to closest residential/sensitive area?	<input type="checkbox"/>	<input type="checkbox"/>	
What are any mitigation measures been made proposed to reduce noise?	<input type="checkbox"/>	<input type="checkbox"/>	
PS5 Land Acquisition and Involuntary Resettlement	<input type="checkbox"/>	<input type="checkbox"/>	
Resettlement of the local population	<input type="checkbox"/>	<input type="checkbox"/>	PS5
Are people being moved from or excluded from the site of the project, particularly on an involuntary basis?	<input type="checkbox"/>	<input type="checkbox"/>	
How many are involved?	<input type="checkbox"/>	<input type="checkbox"/>	
How long have they lived or worked on the site?	<input type="checkbox"/>	<input type="checkbox"/>	
What is the source of this data and how reliable is it?	<input type="checkbox"/>	<input type="checkbox"/>	
Compulsory acquisition of land	<input type="checkbox"/>	<input type="checkbox"/>	PS5
Is land being acquired by or on behalf of the project company through compulsory purchase systems?	<input type="checkbox"/>	<input type="checkbox"/>	

Aspect	Relevant?		Reason/Standard/source/ further comments
	Yes	No	
How and by whom are the assets and resources base being valued?	<input type="checkbox"/>	<input type="checkbox"/>	
Are current inhabitants/users being offered alternative land or cash or both?	<input type="checkbox"/>	<input type="checkbox"/>	
PS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	<input type="checkbox"/>	<input type="checkbox"/>	
<i>Damage to wildlife or habitats</i>	<input type="checkbox"/>	<input type="checkbox"/>	<i>PS6</i>
Is a change of land use necessary e.g. agricultural to industrial or mining?	<input type="checkbox"/>	<input type="checkbox"/>	
Does the project involve the clearance of land?	<input type="checkbox"/>	<input type="checkbox"/>	
What is the present use of land?	<input type="checkbox"/>	<input type="checkbox"/>	
Are any compensating offsets planned e.g. provision of greenbelt areas?	<input type="checkbox"/>	<input type="checkbox"/>	
<i>Degradation of land (e.g. soil contamination, erosion, salinisation)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<i>PS6</i>
What steps will be taken to ensure that land degradation is avoided, e.g. bunding of tanks and other measures to prevent spillage?	<input type="checkbox"/>	<input type="checkbox"/>	
What plans are there or site restoration after the project has closed?	<input type="checkbox"/>	<input type="checkbox"/>	
PS7 Indigenous Peoples	<input type="checkbox"/>	<input type="checkbox"/>	
<i>Impact on minority or vulnerable communities</i>	<input type="checkbox"/>	<input type="checkbox"/>	<i>PS7</i>
Does the project have a disproportionate effect on national, ethnic or religious minority communities or other vulnerable groups in the country concerned?	<input type="checkbox"/>	<input type="checkbox"/>	
PS8 Cultural Heritage	<input type="checkbox"/>	<input type="checkbox"/>	
<i>Damage to sites of cultural, historic, religious or scientific interest</i>	<input type="checkbox"/>	<input type="checkbox"/>	<i>PS8</i>
Does the project affect important sites?	<input type="checkbox"/>	<input type="checkbox"/>	
Is the site near to a recognised World Heritage site?	<input type="checkbox"/>	<input type="checkbox"/>	
Is the site situated on or near to a sensitive area?	<input type="checkbox"/>	<input type="checkbox"/>	

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

EXAMPLES OF TRANSACTION CHARACTERISTICS*	ASSESSMENT	LIKELY E&S RISK RANGE	RESULT
<ul style="list-style-type: none"> • 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.
<ul style="list-style-type: none"> • 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.
<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • Lack of information limits E&S assessment. • Unlikely to meet Export Finance's benchmark 	HIGH to EXTREME.	Refer to Export Finance Executive.
<ul style="list-style-type: none"> • 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.

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