

March 29, 2007

James Lambright
Chairman and President
US Export-Import Bank
Washington DC

Chairman Lambright,

In 2006 environmental non-governmental organizations were pleased to participate in discussions with the Export-Import Bank and Members of Congress concerning environmental provisions included in the Export-Import Bank Reauthorization Act of 2006 (the Reauthorization Act). We write today to inquire into the Bank's progress in implementation of these provisions.

Environmental Representatives on Advisory Committee: The Reauthorization Act requires the Export-Import Bank to appoint to its Advisory Committee not less than two representatives from the environmental nongovernmental organization community. Representatives of our organizations stand ready to serve on the Advisory Committee; however we have not received any indication of how or when the Bank may proceed with the required environmental appointments. This is concerning given that Advisory Committee meetings occur quarterly, and the last Committee meeting that we are aware of was held in December, 2006.

Public Disclosure of Environmental Reports: The Reauthorization Act requires the Export-Import Bank to adopt procedures that:

[P]rovide for the public disclosure of environmental assessments and supplemental environmental reports required to be submitted to the Bank, including remediation or mitigation plans and procedures, and related monitoring reports.

We are aware that the Bank already discloses environmental assessments for Category A (highest environmental impact) projects, but we have not seen new procedures to implement the Congressionally mandated disclosure of supplemental reports. This includes remediation and mitigation plans and procedures as well as related monitoring reports. Have such procedures been adopted, and if not, when will this occur?

Renewable Energy Office/Exports: The Reauthorization Act includes a "sense of Congress" that the Export-Import Bank should within two years establish:

[A]n Office of Renewable Energy Promotion staffed by individuals with appropriate expertise in renewable energy technologies to proactively identify new opportunities for renewable energy financing and to carry out section 2(b)(1)(K) 10 of the Export-Import Bank Act of 1945 (12 U.S.C. 11 635(b)(1)(K)).

Furthermore, the Reauthorization Act requires the Bank to include in its Annual Competitiveness Report a section describing the Bank's efforts to promote the export of goods and services related to renewable energy sources.

We recognize that the two year horizon of the "sense of Congress" has not yet elapsed. However, considering the Annual Competitiveness Report requirement and our mutual interest in the promotion of renewable energy exports, more immediate action by the Bank is warranted.

We look forward to continuing discussions on the implementation of the Reauthorization Act requirements as well as other Export-Import Bank imperatives to safeguard the environment.

Sincerely,

Doug Norlen
Policy Director
Pacific Environment

Bruce Rich,
Director
International Program
Environmental Defense

David Waskow
Director
International Program
Friends of the Earth

CC: House Committee on Financial Services
Senate Finance Committee