



REGERINGSKANSLIET

Stockholm, 15 November 2006

**Ministry for Foreign Affairs
Sweden**

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**RE: OECD Guidelines for MNE, Specific Instance, Regarding Nordea
involvement in Pulp Paper Mill Investment in Fray Bentos Uruguay by
Botnia S .A.**

On 12 July 2006 you (CEDHA and Bellona) reported Nordea to the Swedish National Contact Point (NCP) for the OECD guidelines. You also sent the same report to the Norwegian National Contact Point (NCP).

For organisational purposes the Swedish National Contact Point is part of the International Trade Policy Department at the Ministry for Foreign Affairs. The National Contact Point also consists of representatives from different ministries and the social partners.

Your report alleges that Nordea, as possible partial financier of the Finnish company Botnia's construction of a pulp mill in Uruguay, is not following the OECD Guidelines for Multinational Enterprises.

The Swedish and Norwegian NCP have dealt with the report jointly. Their respective chairmen have also participated in a meeting of the Finnish NCP, when the related report concerning Botnia was dealt with.

Nordea's legal domicile is Sweden. This instance will therefore formally be treated by the Swedish NCP.

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The Swedish NCP, with the support of the Norwegian NCP, has decided to take up the report and consequently it is now formally a specific instance. The report has been assessed in accordance with the rules of procedure prescribed in the OECD Guidelines for Multinational Enterprises. No position has been taken on the substantial part of the report, i.e. whether Nordea has followed the Guidelines or not.



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Chair, Swedish National Contact Point

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