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## Environmental and Social Data Sheet

### Overview

Project Name:	CENTRAL AFRICA RURAL CONNECTIVITY EXPANSION
Project Number:	2021-0739
Country:	REGIONAL - AFRICA
Project Description:	The project relates to the deployment and operation of mobile towers for the provision of low cost basic telecommunication services (voice and basic data service) in underserved rural areas of the Democratic Republic of Congo (850 towers) and Cameroon (240 towers) where the promoter's partner mobile operators are unwilling to rollout their fully-fledged network infrastructure due to lack of financial profitability.
EIA required:	yes
Project included in Carbon Footprint Exercise <sup>1</sup> :	no

(details for projects included are provided in section: "EIB Carbon Footprint Exercise")

### Environmental and Social Assessment

#### Environmental Assessment

The project will target rural areas, which are typically less densely populated and have low disposable income. Therefore, the selected technical solution has prioritised the cost reduction, while still providing an acceptable level of service and functionality. One consequence of this objective is that the project's mobile sites have a significantly smaller footprint than standard mobile towers and do not use diesel generators, minimising the associated disturbances for the population and the environment. In particular, the mobile sites covered by the project will be fully powered by solar panels and batteries, avoiding all GHG emissions during the network operation phase. This model is only possible thanks to the proprietary mobile network equipment used by the promoter which is significantly more energy efficient than standard equipment.

The project is aligned with the Paris agreement as it improves the availability of digital services while avoiding any GHG emission. In addition, the project is eligible for Climate Action-Mitigation due to the expected high energy efficiency performance,

If the project were located in the EU, the project activities would not fall under any of the Annexes of the EIA Directive 2011/92/EU as amended by Directive 2014/52/EU. However,

<sup>1</sup> Only projects that meet the scope of the Carbon Footprint Exercise, as defined in the EIB Carbon Footprint Methodologies, are included, provided estimated emissions exceed the methodology thresholds: 20,000 tonnes CO<sub>2</sub>e/year absolute (gross) or 20,000 tonnes CO<sub>2</sub>e/year relative (net) – both increases and savings.



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 according to DRC's environmental legislation<sup>2</sup> as well as Cameroon's legislation<sup>3</sup>, an ESIA is required for the approval of the installation of telecom towers by the relevant authorities in both countries.

Site selection is ongoing. Sites are clustered in several zones to be rolled out and launched in batches. The promoter has deployed a number of sites already as part of its pilot phase in both countries, which do not yet have an ESIA approved by the authorities. The presentation of the corresponding ESIA approved by the authorities will be a condition for first disbursement under the EIB finance contract. Going forward, the promoter will conduct the mandatory ESIA gradually and will obtain the authority's approval before deployment of each group of sites. This will be a condition for disbursement for the tranche of the EIB loan to finance each group of sites.

Due to network sites' small footprint, not requiring relevant civil works for their deployment, the installation in existing settlements, and the lack of GHG emissions during operation, the project is not expected to have relevant environmental impacts. On the other hand, mobile network equipment generates electromagnetic field (EMF) radiation. Studies are ongoing to further assess the potential long-term effects of use of mobile devices. So far mitigation measures adopted are mainly related to limits to the radiation of the mobile base stations and the control of the power of the handsets. Neither DRC nor Cameroon have specific regulation on EMF exposure limits in place, so the project will comply with the ICNIRP guidelines, which are also the basis for the corresponding EU recommendation (1999/519/EC).

## Social Assessment

The promoter has undertaken to acquire the land necessary for the project sites through voluntary lease agreements. The sites have a small physical footprint of 9m<sup>2</sup> or 36m<sup>2</sup>, depending on the type of site deployed. Once the land is secured, usually at central locations within existing rural settlements, the site installation requires about five working days. The promoter outsources the land acquisition process, as well as the installation and management of the sites.

To ensure that the land is not contested, that the concessions are indeed voluntary and do not lead to involuntary resettlement or impacts on Indigenous Peoples, the project has a thorough site identification and verification system in place. Although this is not expected, should any unforeseen competing land ownership or land use claims arise, or in the event of any involuntary resettlement or impacts on Indigenous Peoples, the project will manage those situations and address related impacts in line with the Land Acquisition and On-Site Management Plan developed as part of the Environmental and Social Management System (ESMS).

The project is estimated to require around 153 person-years for implementation and to generate 286 new permanent jobs for the operation. In all cases, these numbers include central, regional and local teams of the promoter, as well as local contractors on-site. During site installation, most of the work will require a certain level of skill/training, with some further unskilled labour required for site preparation. During operation, corrective maintenance will be carried out by a

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<sup>2</sup> Law N°11/009 of 09 July 2011 on fundamental principles for the protection of the environment and Décret n° 14/019 du 02 août 2014 fixant les règles de fonctionnement des mécanismes procéduraux de la protection de l'environnement

<sup>3</sup> Décret 2013/0171 du 14 Février 2013 fixant les modalités de réalisation des études d'impact environnemental et social and Arrêté n° 00001/MINEPDED du 08 février 2016 fixant les différentes catégories d'opérations dont la réalisation est soumise à une évaluation environnementale stratégique ou à une étude d'impact environnemental et social



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team of trained technicians based in regional hubs. Local community members may be further engaged for light maintenance and surveillance work.

The project is located in remote areas in DRC and Cameroon, which may be prone to or impacted by conflict. To avoid exacerbating existing conflict dynamics, and further addressing other risks to project employees and local communities, the promoter will develop and implement a Health, Safety and Security Management Plan. A Code of Conduct and a Labour Management Plan is further under preparation as part of the ESMS. Contractor and supplier contracts will include labour and occupational health and safety obligations in alignment with these Plans and Code of Conduct.

### **Public Consultation and Stakeholder Engagement**

The promoter will develop and implement an overarching Stakeholder Engagement Plan, which will map the engagement process in both countries at national, regional and local levels, including during the ESIA process. This plan, which will also specify the project's grievance management mechanism, will be key in managing community expectations, as well as avoiding and addressing potential conflict-related risks.

### **Other Environmental and Social Aspects**

The promoter is a leading Canadian supplier of mobile and broadband wireless infrastructure solutions, with limited experience in the execution of mobile infrastructure projects. The promoter will rely on local contractors for the implementation and operation of the project, including for the land acquisition and the overall E&S management. The promoter plans to enhance its E&S expertise for the project, including to oversee the work of contractors. Three E&S staff members will be hired at the central level and the two regional offices in DRC and Cameroon respectively.

Considering the complex organisation structure and in parallel to the pilot site deployment phase, the promoter has developed a draft Environmental and Social Management System (ESMS). The ESMS outlines the roles and responsibilities of the different actors involved and further provides an overview of the overall E&S requirements and operational framework for the project in both countries. The ESMS has been developed with the assistance of specialised E&S consultants. The presentation of the final ESMS to the satisfaction of the Bank will be a condition for first disbursement of the EIB loan.

## **Conclusions and Recommendations**

The project is not expected to produce any relevant environmental impact, after application of industry-standard mitigation measures. Potential residual social impacts are also likely to be low, given the small footprint of the sites, the location inside rural settlements and the mitigation measures to be developed by the promoter with the support of a specialised consultant, including the implementation of a supplier code of conduct which will ensure the alignment with the standards across the supply chain. On the other hand, the project will have significant positive E&S impacts, notably due to the lack of GHG emissions during operations, and the wide-ranging socio-economic benefits that digital infrastructure deployment has been shown to generate for the local communities.



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The promoter will provide the complete and final ESMS, including all its components (such as Stakeholder Engagement Plan, Land Acquisition and On-site Management Plan, Health, Safety and Security Plan, Labour Management Plan), to manage the project, as well as the supplier Code of Conduct, as a condition for first disbursement of the EIB loan. In addition, the promoter undertakes to include in contractor and supplier contracts an obligation of compliance with the Code of Conduct and the ESMS. Finally, the promoter will provide the ESIA's for the mobile sites included in the corresponding tranche of the loan before its disbursement.

With the appropriate conditions in place, the project is acceptable for financing in environmental and social terms.