

Environmental and Social Data Sheet

Overview

Project Name:	<i>SNIM VIII</i>
Project Number:	<i>2015-0008</i>
Country:	<i>Mauritania</i>
Project Description:	<i>The project consists of the dredging works related to the deepening and enlargement of the access channel to the Port of Nouadhibou solid bulk terminal, where iron ore from the Société Nationale Industrielle et Minière (SNIM) production facilities is handled. The project will allow bigger vessels to berth at the SNIM terminal, increasing the environmental sustainability of the supply chain associated to SNIM's business model and reducing its transport costs.</i>
EIA required:	yes
Project included in Carbon Footprint Exercise ¹ :	no

Environmental and Social Assessment

Environmental Assessment

- The project has been subject to an ESIA process according to the Mauritanian Law: *Loi n. 2000-045 Code de l'Environnement*. The Competent Authority has issued a favourable opinion on the environmental and social feasibility of the project, dated of 15th August 2017.
- The Competent Authority is the *Autorité de la Zone Franche de Nouadhibou*, to whom the Ministry of Environment has delegated the responsibilities to represent the environmental central state services and report on and issue environmental and urban permits and authorizations. This delegation of responsibilities is defined within the framework of the *Loi n. 2013-001 Création de la Zone Franche de Nouadhibou* and a subsequent *Protocole d'accord de transfert de compétences*.
- The ESIA process (which was developed with the support of an international consultant) consisted of: a) definition of the terms of reference; b) realization of a public consultation day organized by the Promoter; c) ESIA document, including an ESIA Report and an ESMP; d) submission of the full ESIA document to the Competent Authority by 10th July 2017.
- For the construction phase, the main impacts identified on the ESIA are: destabilization of the seabed including physical and other bathymetric changes; water quality decrease by turbidity and waste spillage including potential transboundary impacts; potential for encountering contaminated sediment, air quality decrease due

¹ Only projects that meet the scope of the Pilot Exercise, as defined in the EIB draft Carbon Footprint Methodologies, are included, provided estimated emissions exceed the methodology thresholds: above 100,000 tons CO₂e/year absolute (gross) or 20,000 tons CO₂e/year relative (net) – both increases and savings.

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to gas emissions from the construction equipment; increase of noise and vibration levels, both aerial and underwater, also from the construction equipment; impacts in fauna and flora by collision, high noise levels, destabilization during dredging operations, increased turbidity and waste spillage.

- For the operational phase, the main impacts acknowledged on the ESIA are seabed destabilization, hydrodynamic changes, decrease of water quality by turbidity and accidental spillages, increase in the noise and vibration levels close to the terminal, decrease of air quality and disturbance of the local ecosystem by collision, high noise and vibration levels and accidental waste spillages.
- There are a number of sensitive ecological areas in the vicinity of the Project including two areas of shallow sea grasses, the Cap Blanc protected marine reserve and the Parc National du Banc d'Arguin. The Project is not expected to impact upon these areas.
- The mitigation measures identified at the ESIA are: adequate planning of the construction works and of the equipment maintenance to be shared with the Harbourmaster and the Port Authority; implementation of good or best available dredging techniques aligned with the meteorological conditions; sediment characterisation and sampling prior to works, a grievance mechanism capturing potential transboundary impacts; selection of adequate equipment with low noise levels; noise level monitoring during works; implementation of speed limits; proper stocking and management of waste materials aligned with Marpol guidelines; implementation of a Preventive Plan to minimize and a Management Plan to tackle accidental spillages; regular inspections by the Promoter; implementation of a buoy system to mark the dredging areas and the passing corridors for fishermen and other users; reduction of the number of working vessels to an indispensable minimum; limitation of speed and working hours in the presence of megafauna; implementation of a record log for megafauna observations and collisions; implementation of a complaint log for fishermen; implementation of monitoring plan for the water quality and bathymetry in the channel and the deposit areas, including turbidity; monitoring of the air quality in the area of the dry bulk terminal. The residual impact after compensatory and mitigating measures is expected to be limited.
- The ESIA identifies a number of potential positive impacts of the dredging project: decrease of the maritime traffic due to the higher capacity of the new vessels berthing at the SINM's terminal, job creation during construction and capacity increase at SNIM's facilities with the related indirect benefits for the local economy.

Social Assessment

- The main adverse social impact is related to a temporary economic displacement / loss of livelihood of the local fishermen community in the Nouadhibou Bay region. The project entails dredging works, affecting the local traditional fishermen community.
- An assessment of the direct impacts of the works in the local fishing activities has been performed and integrated in the ESIA. The main impacts are the decrease of water quality, increase of noise levels and destabilization of the seabed, affecting the local fisheries and restrictions to fishing activities due to the dredging works.
- The ESIA defined some mitigation measures and some additional measures have been discussed and agreed between SNIM, the fishermen community and AfDB (African Development Bank), the other co-financier, in a meeting held in September 2017. The Bank will require that all the measures are properly included in the ESMP

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and fully implemented during the works. These mitigation measures include: implementation of a buoy system to mark the dredging areas and the passing corridors for fishermen and other users; implementation of a complaint log for fishermen as part of a wider grievance mechanism; establishment of a coordination unit integrating SNIM and the fisherman community to facilitate communication between both parts during the dredging period.

- In accordance with national law on labour standards and ILO obligations ratified by Mauritania (Mauritania ratified all ILO fundamental conventions), the works contracts will comply with ILO core labour standards. Contractors shall ensure occupational and community health & safety as part of their works contracts.
- However, effective enforcement of ILO conventions in Mauritania has been inconsistent (especially in relation to ILO conventions number 29. Forced labour and 87. Freedom of association). It should be noted that SNIM is perceived to enforce these conventions and has organized amongst its workers several unions.
- In order to ensure that the core principle and standards of ILO conventions are upheld through the project, the promoter will be expected to: i) include provision for their respect in the contractual documents for works. These provisions should apply to the main contractors and subcontractors and shall be monitored during the construction works; ii) conduct an independent labour auditor.

Public Consultation and Stakeholder Engagement

- Official public consultation under the legal Mauritanian framework was organized by the Competent Authority. The related documents were physically available during 1 month both at the Moughataa (Department) and the Commune of Nouadhibou and at the headquarters of the *Zone Franche de Nouadhibou* as well. The announcement of the public consultation was published in the local press by July 14th, 2017, namely in the *Chaab* (Arabic) and the *Horizons* (French).
- Previously, in March 15th, 2016, SNIM and the ESIA consultants also held a one day information session open to the public about the project and its impacts. This session took place in the IMROP (*Institut Mauritanien de Recherches Océanographiques et des Pêches*) at Cansado, Nouadhibou.
- In July 20th, 2017, SNIM also held an information session with the local fishermen community, represented by the *Fédération des Pêcheurs de Nouadhibou*. In September 2017, the AfDB also met the fishermen community and agreed together with SNIM in some mitigation measures to compensate the community.
- The ESMP will also define the ongoing stakeholder engagement and public consultation to happen during the project implementation, in particular in relation to the engagement with the local fisherman.

Other Environmental and Social Aspects

- To guarantee a proper follow up of the implementation of the ESMP the Bank will require the Promoter to establish a contract with an independent technical consultant to provide support and monitor the environmental and social matters of the project.

Conclusions and Recommendations

Disbursement Conditions

- The Promoter shall submit to the Bank the summary of the official public consultation held by the Competent Authority (Zone Franche de Nouadhibou) during July and August 2017.
- The Promoter shall establish a technical support contract to provide environmental and social monitoring of the project and support the Promoter in other related issues. In the contract will also be included a full review of the ESMP to be performed before the negotiation and award of the dredging contract. In the case of project delays, the contract shall also foresee a monthly extension fee until the completion of the works. This technical team will report in parallel to the EIB and the Promoter.
- An ESMP validated by the Environmental & Social monitoring consultant shall be submitted to the Bank's satisfaction before the start of the dredging works. The Promoter shall also ensure that the additional mitigation measures defined in the meeting held between SNIM, AfDB and the fishermen community will also be included in the ESMP in order to be duly implemented during the project.
- A Stakeholder Engagement Plan will be done as part of the ESMP.
- A declaration by the Competent Authority that aligned with the standards and principles of the EC Directive 92/43/EEC the Project is not likely to have significant effects on a site of nature conservation importance.
- The promoter will include provision for the respect of ILO conventions in the contractual documents for works.
- The Promoter shall undertake an independent labour audit to the project related works with the support of an external consultant.

Undertakings

- The Promoter shall ensure that an adequate ESMP, defined according to the relevant ESIA and the corresponding environmental authorisations, is implemented and monitored during the construction off the project, and will notify the Bank of any unexpected environmental impact or incident during the construction of any component.
- During the construction works the promoter should monitor and give regular updates on the respect of the fulfilment of ILO conventions by main contractors and subcontractors.

Subject to the fulfilment of the above mentioned conditions, the overall residual impacts of the project are considered to be manageable and acceptable. The Promoter will be appropriately staffed and its environmental capabilities and track record are considered to be satisfactory.

Therefore, the project is acceptable for EIB financing from an environmental and social point of view.