



Netherlands Commission for  
Environmental Assessment

SENEGAL (ORIO10/SN/01)

# Quick Scan (Review) of the ESIA Report on Development of the Port of Ziguinchor



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## Advice of the Secretariat

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**To** ORIO

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**From** the Netherlands Commission for Environmental Assessment (NCEA) –  
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**Subject** Quick Scan (Review) of the ESIA Report on the Project ORIO10/SN/01  
'Development of the Port of Ziguinchor', Senegal, July 2014

By: the Secretariat of the Netherlands Commission for Environmental  
Assessment – Ms Gwen van Boven / Ms Ineke Steinhauer

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# 1. Introduction

The Senegalese *Agence National des Affaires Maritimes* (ANAM) is applying for ORIO funding in order to (re) develop the port of Ziguinchor in the Casamance region of Senegal. The project includes dredging of the Casamance river, construction and renovation of the port of Ziguinchor, including fuel facilities, the construction of a new jetty at the fisheries port of Boudody, and technical management support to port functioning.

Screening of the project by the NCEA (September 2010) indicated the requirement to submit this project to an environmental and social impact assessment (ESIA), according to Senegal's national regulations. The ESIA report was written in July 2014 by Royal HaskoningDHV together with Tropica Environmental Consultants, on behalf of ANAM. ORIO requested a quick review of the report in October 2014.

## 1.1 Approach to this Quick Scan

ORIO, as part of its decision making processes on financing, performs a technical and procedural conformity check of project proposals. The more technical review of quality of contents of the ESIA, including an appreciation of the suitability of the overall project in terms of social and environmental impacts, is conducted by CREM consultants. The NCEA does not express an opinion on the project itself, but focuses on the quality of the ESIA. To be complementary to the technical analysis conducted by CREM, the NCEA limited itself to a quick scan of the ESIA, in terms of advice on the legislative and procedural requirements for environmental assessment of the proposed activity and how these can most effectively be met. Additional advice may be given, if relevant, on how sustainability issues and environmental risks can be managed in project implementation. This depends upon knowledge available at NCEA's secretariat on:

- the nature and scale of the proposed interventions and potential impacts;
- general knowledge of the areas where the interventions would take place;
- experience from similar projects in the past;
- sector specific guidelines.

This advice is a so-called NCEA 'Advice of the secretariat', for which no external expertise was used at this stage. Aside from a check against its own Terms of Reference (if available), the Draft ESIA was checked for conformity with the national ESIA requirements, as well as with IFC's Performance Standard 1, on ESIA.

In the case of shortcomings, the consequences for decision making are assessed and recommendations are given for supplementary information needed to address these shortcomings.

The ESIA report was reviewed as a stand-alone document, meaning that all information necessary for decision making should be contained in the ESIA report, without requiring the reader to consult other documentation to complement gaps in information in the ESIA itself.

As background information, however, the NCEA had access to the following documents:

- Port of Ziguinchor – Project Plan ORIO (draft of august 2014);

- NCEA screening on the project (september 2010);
- National legislation : *Loi N° 2001-01 du 15 janvier portant Code de l'Environnement : titre II;*
- National legislation : *Décret N° 2001-282 du 12 avril 2001 portant application du Code de l'Environnement, titre II : Etude d'impact sur l'environnement (articles R 38-44);*
- IFC Performance Standard & Guidance Note 1 : Assessment and management of environmental and social risks and impacts (January 2012).

In the following chapters, we first present our key observations in relation to the national ESIA requirements, IFC performance standard 1, and the technical contents of the draft ESIA (chapter 2). In chapter 3, we elaborate in detail how we have come to these conclusions, by providing observations for each chapter of the ESIA report.

## 2. Key observations

### 2.1 Conformity with national ESIA procedure

The national EIA procedure is regulated by the Senegalese Environment Law and the Decree regulating its application. The regulations require the elaboration of a Terms of Reference for the impact study. The project proponent or his consultant should elaborate a draft ToR, to be validated and approved by the authorities (DEEC). Once approved, these ToR form the basis for the project's EIA study. For this particular project, the ToR have been approved by DEEC on January 20, 2014. The ToR have been attached to the ESIA report (although as a separate file, instead of as an integral part of the PDF that contains the report).

The structure of the report does not entirely follow the structure of the ToR, which makes a check of conformity a little harder. Some important elements that seem to be missing will be discussed in 2.3.

Senegalese regulations in general, but moreover the ToR for this particular project specifically require public participation. The current ESIA report does not fulfil this requirement. Although it shows that some consultation has taken place, this seems to be very limited and the NCEA considers the related reporting insufficient to allow verification or proper assessment of the results (see also chapter 3 for detailed observations).

- The NCEA recommends the authors to comply with the approved ToR by improving the presentation of the different elements detailed in par. 2.3, below.
- The NCEA further recommends a more thorough public participation process, especially at the level of identification and assessment of alternatives, impacts and mitigation measures.

### 2.2 Conformity with IFC Performance Standard 1 (PS 1)

IFC's Performance Standard 1 relates to the assessment and management of environmental and social risks and impacts. The national requirements as prescribed in the legal framework for environmental assessment in Senegal and more specifically, the specific ToR for this ESIA,

fall within the standards set by PS 1. PS 1 contains some additional requirements that are relevant to this project, but with which this ESIA report does not yet seem to comply with.

Examples include:

- Requirement 11 basically asks for a consistency check with plans, studies or assessments that are related to the project and its area of influence, to help identify any possible conflicts of this project with other activities that need to be known for decision making. From the current ESIA report, it cannot be established whether this has been properly done.
- Requirement 17: organisational capacity and competency: the ESIA ought to demonstrate that sufficient organisational capacity and skills will be available throughout the project to implement the ESMP. The NCEA explains below that this is currently not clear.
- Requirements 20 & 21: emergency preparedness and response, is not currently clearly described in the ESIA. This is relevant:
  - o in case of contamination in the vulnerable mangrove system caused by accidents with tankers carrying toxic or otherwise dangerous produce;
  - o contents of dredged sediments are not known yet – and disposal sites not yet certain (see also 3.3 below), so that consequences of an emergency remain unclear.
- Requirements 25 and onwards demonstrate the importance attached to stakeholder engagement. In 3.4 below the NCEA observes that this has not been treated accordingly in the current ESIA process and report.

## 2.3 Quality of Technical content

The authors of this ESIA present a lot of relevant information and have made an effort to complement data that were not readily available yet by adding field observations and modelling results. However, the NCEA finds the presentation unbalanced: a lot of focus has been put on the description of the current situation, while the description of the project and the analysis of its potential impacts is not properly done.

As will be demonstrated in more detail in the next chapter, the project description is incomplete. Choices on dredging location, composition and disposal sites of dredging material have not yet been made or information has not been shared through this ESIA. This leaves the reader without a full understanding of the activity, and therefore, of the potential environmental and social impacts of this project.

Further more it will be demonstrated that impacts have not been identified and presented in a structured manner. Impacts have been discussed and mitigation measures proposed, but in such a scattered way that proper assesment of their completeness and appropriateness is hard.

Probably as a consequence of these ommissions, the ESIA currently does not present a clear, measurable Environmental and Social Management plan, presenting in a structured way such as in a table, for each impact the proposed measures, when and how to implement them and by whom and against what cost, allowing easy appreciation of the project and the acceptability of its impacts, and against which costs. A detailed monitoring plan is equally missing.

Finally, the participatory process in which this ESIA was elaborated appears weak. The ESIA report does not demonstrate that stakeholder concerns were carefully documented and taken into account in project design. This raises concerns as to whether sufficient awareness and support has been raised to allow efficient project implementation.

The very reason that an ESIA is carried out, is to make it possible for the decision makers to get a clear impression of the potential environmental and social impacts of an activity, and how such impacts could be mitigated, so that they can decide whether they find these impacts acceptable or not or whether alternatives would provide a better solution. From the current document, the NCEA finds it hard to form such an impression.

- The NCEA recommends a revision of the current ESIA report. The information needs to be more efficiently selected and presented to allow informed decision making on the project. To this end, the report also needs to be complemented at the level of crucial components: project description including alternatives, impact identification and analysis, and public participation.

- The NCEA further recommends the integration in the final version of the ESIA report of a clear overview of impacts, mitigation measures, required capacity and finances for their implementation as well as indicators for monitoring, through an Environmental and Social Management Plan (ESMP) and monitoring plan. Both should be presented in table form to allow easy assessment of quality and completeness.

### **3. Detailed observations per chapter**

The structure of this chapter will follow the structure of the ESIA report.

#### **3.1 Introduction**

The NCEA has no specific observations on this chapter.

#### **3.2 Legal and institutional framework**

The report begins with an outline of the legal and institutional framework, without having introduced the project first. This makes it hard to assess the appropriateness of this chapter.

The chapter seems to be largely in conformance with the ToR. Some observations can be made:

- some legislation that is listed is hard to find online. It would be helpful if references/links were provided;
- information on the legal framework for biodiversity & protected area management seems under represented, there is a paragraph under fisheries (2.2.2.) but of course biodiversity and protected area management is broader than that;
- the text provides an overview (list) and sometimes description of legislation, but does not always explain the relevance to the project. In cases where it is done, it greatly enhances understandability/relevance of the text. Examples where it is done:
  - o permit of storage of fuel in tanks, p10;

- a VERY good example is 2.4.2., which provides a direct translation of sediment quality standards to action levels for this project.

Examples where it is omitted:

- land tenure: after knowing what types exist in Senegal, it would be good to explain how this applies/is relevant to the project?
  - protected areas: where do they exist in the project area?
  - Ramsar. Why does it apply? Which part is Ramsar site?
- The NCEA recommends to change the order of the chapters and start the report with a detailed project description, so that the reader can assess all subsequent information against that background.
  - The NCEA further recommends to limit the information provided to those laws and regulations that are directly relevant to the project, and to demonstrate this relevance in the text.

### 3.3 Project description and consideration of alternatives

The ToR ask for 1) a general description of the site, 2) a detailed description of the activities, and 3) information on maintenance and investments required outside the project area. As part of 2), the ToR specifically require information on the different phases of the project and material to be used at the construction site, as this is considered 'indispensable' to the determination of impacts and phases of works, later on.

The chapter in the ESIA report does not present the information along the lines of the ToR, making it harder to assess compliance. A calendar shows distinction between project phases, including the construction/dredging and the operation phases. Information provided for each phase (in par.3.1.7.) is extremely limited and does not allow for a full comprehension of the activities proposed. Part 3) seems to be missing altogether. Reference is made to several studies that would contain further information: a port facilities upgrade report, a conceptual design for the liquid bulk terminal, a cargo forecast study. These studies are not made available in the ESIA so that not all information is available to judge potential impacts later on.

The project concerns a reconstruction and upgrading of an existing port, including dredging. *The Background to the project (3.1.1)* is a repetition of par. 1.1 introduction to the project (cut & paste) and remains very general. The chapter in general remains rather limited in information. The project plan seems to contain a little more information and more data, including implementation plan, but this information is not included in the ESIA and is still limited. Statements like 'all technology will be proven technology' do not allow for proper assessment of impacts and possible alternatives. The sector context/other players/projects seem better described in the project plan, but not in the ESIA.

#### *Dredging activities (3.2)*

Dredging depth (3.2.1) is based on the assumption that vessels will have a draft of 6.0m. It is not explained whether this is realistic, or based on studies on expected future use of the port. This makes it hard for the decision maker to know whether this will be sustainable and will not require further dredging in the near future, or whether it is too much for the projected future economic activity and may cause unnecessary environmental damage.



Dredging method (3.2.2.) and sediment disposal (3.2.3.) have not yet been decided upon. Also the dumping site of the dredged material is not considered in detail in the ESIA. Yet this is essential information to understand potential impacts of the project. Dredging activities can cause major negative environmental impacts, which can be avoided by using environment friendly techniques (such as the use of screens) and by an informed selection of disposal composition and location. Recommendations are announced in the ESMP in chapter 6, but this ESMP is considered by the NCEA to be incomplete (see below).

#### *Port facilities upgrade (3.3)*

Throughout, this paragraph seems to describe the current situation with an assessment of its adequateness, rather than providing a clear overview of the intervention. After reading 3.3. it is not clear what the activities will entail exactly. Reference is made to a Port facilities Upgrade report that should comprise a conceptualisation of measures and design works to upgrade current facilities, but this conceptualisation is not clearly presented in this EIA report, making it hard to judge potential impacts.

In 3.3.5 it is mentioned that there is no port facility security plan yet. The design of the liquid bulk terminal is very poorly described (3.3.7), although a conceptual design is said to be available. That conceptual design is said to include safety measures to ensure safe operations of the terminal, but these measures are not described in the ESIA. The ToR require the execution of a risk study (étude de dangers), according to a methodology prescribed in Senegal. The NCEA does not have a copy of this methodology but expects it include studies into port facility security aspects and safety measures. These are currently lacking in the ESIA, but announced as part of future technical assistance. This would not be conform ToR.

3.4.1. At the port de Boudody, it is proposed to use fill/reclamation material to construct a small land reclamation at the entrance to the port which can be used for the fish market. However, it is not mentioned where this material will be sourced and what its composition or quality will be. If it is dredging material, on p. 34 (par. 3.5.2.) there also seems to be no certainty of the composition and quality (polluted?) of the dredging material. Either way, content of the material is not known and potential impact related to its quality therefore unpredictable.

#### *Consideration of alternatives (3.5)*

The ToR put specific emphasis on the description of alternatives, requiring a separate chapter with a full description of alternatives, if possible using a multi-criteria analysis, allowing quantification of costs and benefits of each alternative, and associated mitigation measures. If this is not possible, the consultant is required to provide an explanation and a justification of the choices made. Yet, the NCEA notes a very limited provision of information on alternative options to the project. Alternatives are considered in as little as 3 pages (in an ESIA of 224 pages) and without the level of detail, quantification, explanation and justification that is required by the ToR. Interesting alternatives to consider would for example include alignment and depth of dredging in line with a port master plan (projection of number/size of ship movements, material to be transported, etc).

- The NCEA recommends to include a more clear description of the project activities in the ESIA, making use of information already available in the project plan and other documents, allowing the reader to fully understand what exactly is being proposed, when and where.

- The NCEA also recommends a more elaborate description of alternative options to the project, to such an extent that equal comparison of alternatives is made possible.

### 3.4 Baseline environmental and social conditions

First, an observation on the structure and the presentation of this chapter. It forms the bulk of the ESIA report: almost 100 pages, divided in sections Approach (p.37), Physical environment (p.37), Natural environment (p.53), and Human environment (p. 114). Because of the bulkiness of the chapter, a summary with key findings would have been useful to make the information easier digestible. Also, the order of topics within the sections is not always logical. In the Physical environment, for example, information on air quality (4.2.6) and on noise (4.2.7) sits between coastal processes (4.2.5) and marine water and sediment quality (4.2.8), which seem more related. Yet, the presentation of the landscape and general characteristics of the estuary, which would make a logical introduction to the area, are presented at the end (4.2.10) of that section. Finally, there are some small errors which make navigation difficult. For example, page numbers jump from 62 to 31, and the text refers to table 4.10 for sediment analysis results, but this should be 4.8 as table 4.10 contains a summary of salinity profiles.

All in all, a better presentation and a proper editorial check of this chapter would help the easy use of its conclusions in the decision making process.

Then, regarding the contents of this chapter:

#### *Physical environment (4.2)*

Data was on *coastal processes* (4.2.5) collected during two weeks in November 2012, the dry season in the Casamance region. Seasonal variations have therefore not been measured, and have in some cases been modelled (wave conditions, p.51, sediment transport and deposition, p.53). However, the design of the models, the data that were used as an input and the results have not been clearly described. Figure 4.12, for example, is not easy to read, as it is only said that it is 'based on the physical processes operating in the area', without explaining which ones and during which six months in a year. A note on beach erosion (p.57) is based on a single observation, it remains unknown whether it takes place during the year or if it is due to seasonal variations in the wave climate. Further information related to sedimentation/erosion is presented as uncertain/not well understood. This is relevant when deciding on investments in relation to a major dredging activity.

Par 4.2.6. *on air quality* brings confusion by stating that air quality is not monitored, while later on presenting results of monitoring. Apparently, during the ESIA a monitoring programme was carried out. Locations of sampling sites have been provided, but the approach, duration, frequency of measurements is not explained. It is hard to tell whether the correct or sufficient locations have been chosen. The results are presented in a table in which also Senegalese and US thresholds have been given, making it easy to judge whether results stay within acceptable limits. However, the table is not complete, uses acronyms that are not explained (BDL) and does not provide the source of these thresholds, in case one would want to check this information.

On p. 59 pollution from dust due to mining operations is discussed. What is the relation with this project?

The approach for baseline *noise surveys* is much more clearly described (par 4.2.7.). The level of detail is remarkable, especially when compared to the previous section. This ought to be more balanced.

However, the survey period seems very short (5 days in March 2014) to allow drawing of conclusions for week-day/weekend-day differences in noise levels, or day-time/night-time, as is currently being done. This may have been an uncharacteristically noisy or quiet week. It is therefore hard to judge the reliability of these conclusions.

The study area for *marine sediment and water quality* is chosen “based on the dredging and reclamation areas as well as the disposal grounds identified for the capital works” (p.40). As these were not yet fully known (ch.3), it remains to be checked whether the study area and the activity areas will indeed be the same.

Very few *soil quality* samples (4) were taken in a very limited number of locations (1, the area of the tank facilities) and in the dry season only. *Ground water quality* was measured in two wells only (par 4.2.9.). Without further explanation on background level or standards, it is concluded that there are no concentrations of concern. It is hard to judge the validity of this conclusion on the basis of this little information.

#### *Natural environment (4.3)*

Sixty pages on this subject is a lot and makes it hard to digest the essentials for decision making. The section could easily be shortened:

- information on fisheries activities (p.91–99) is well elaborated but does not belong to this chapter and can be presented elsewhere, for example under Human environment;
- descriptions of marine mammals and turtles (4.3.5, p 99 – 111) can be found in literature, and could be limited to project relevance only.

Alternatively, a summary highlighting key information for decision making would be useful.

The study plots seem to be located in the coastal areas and around Ziguinchor only, and not further inland/upstream. Will activities increase there, as a result of the project? This is likely, and if so, it will be important to establish the baseline situation there as well.

The Casamance is considered important as a staging area for migratory birds during European winter, as is also remarked by the authors of this report (p.61). However, to establish that fact, the survey would need to be done earlier in the season. By march, many or most migratory species will have left the area. This survey is therefore likely to underestimate the importance of this area for migratory birds.

When providing a baseline on flora and fauna in an area it is common to include the IUCN red list status of the species, informing the reader of its abundance and protection status. This information is provided for marine mammals and turtles (p.111) but is currently lacking for birds and others groups.

Also, the Ramsar convention is supposed to be applicable to this project (as it is listed in Ch.2 on the legal and institutional framework), but in this section, no mention is made of any Ramsar site or 1% population criteria. If these apply, the area will be considered as

internationally important requiring higher protection standards, having serious consequences for the acceptability of project activities.

#### *Human environment (4.4)*

This chapter provides extensive information on administrative, economic and cultural aspects. It is quite lengthy but seems well elaborated. The NCEA considers stakeholder participation to be the weak point of this section. It starts with the methodology and some pictures of stakeholder engagement (4.4.1), but does not present the results until par.4.4.18. This could be better structured. More importantly, stakeholder participation ought to be given more attention and a more prominent position to be conform the ToR. The results cover less than 2 pages and contain a narrative only, basically stating overall support to the project, without allowing for verification of results through minutes of meetings or contact details of consulted people. A clear identification of stakeholders, and an explanation of their interest in the project, is lacking. This is especially important in a project that is planned across administrative boundaries, as is the case here (see par 2.1 in the ESIA).

All in all, currently, the ESIA does not demonstrate a sufficient participatory process building awareness and support for the project. In Annex 6, a table containing results of public participation is provided, but since in the text no reference is made to this annex, decision makers will not easily find this information. Even so, the information is still not verifiable as any concrete data (names, dates, place, phone numbers) are incomplete or missing altogether. A final, remarkable observation is that one of the contributors to the ESIA seems to be listed as consulted person as well (Ameth Diarra Diop). If this is the case, this would signify an unacceptable conflict of interest.

- The NCEA recommends a revision of this chapter on baseline environmental and social conditions along the lines of the above observations. These relate to the structure (logical order and presentation of information) and the quality of the information. It is recommendable to render the chapter more concise and to insert summary tables at the end to facilitate getting an a good overview of the situation.
- The NCEA further recommends an improvement of the public participation process and the presentation of the results of this process in a separate chapter. Specific attention will need to be paid to the verifiability of the information and the justification of the results of the public participation in the further assessment of impacts of this project.

### **3.5 Impact assessment**

Good practice ESIA follows a certain logical build-up of the heart of the ESIA report:

1) identification of impacts, 2) assessment of the importance of impacts, 3) measures to mitigate impacts, 4) an environmental and social management plan. The current ESIA report does not contain a chapter on 1), identification of impacts. It combines 2) and 3) in the current chapter 5.

As a consequence of the fact that the identification of impacts was skipped, a clear overview with identified impacts and their importance is missing in this chapter. The reader is required to read through the entire chapter (almost 80 pages) to find scattered descriptions and evaluations of impacts. This makes it hard to see whether the chapter is complete, or whether important impacts have been missed.

Also, the chapter contains propositions for mitigation measures, which ought to be presented in a separate chapter to allow first an appreciation of impacts of the project as it is, then an appreciation of the project including mitigation measures, for the decision maker to understand residual impacts at what cost. Possible measures should be presented as SMART as possible.

Impacts from the decommissioning phase (5.6) cannot be assessed as currently the main issue, the dismantling of the oil tanks, is not described and is postponed for the time of decommissioning. Cumulative impacts (5.7) also cannot be assessed as this paragraph only makes a statement without further justification. It does not contain any verifiable analysis. This is not conform the ToR, which require specific attention to cumulative impacts.

- The NCEA recommends a reshuffling of the information on impacts in this ESIA report, as follows:
  - start with a separate chapter called Identification of impacts, listing the potential impacts of this project;
  - continue with a separate chapter containing a step by step assessment of each of the identified impacts, including a justification of the assessment. This chapter should end with a summary table providing an overview of identified impacts and their importance;
  - finally, include a chapter identifying mitigation measures for each of the impacts. These should be formulated in a SMART way as much as possible. Again, conclude this chapter with a summary table allowing easy overview of impacts, their importance and ways to mitigate them.
- The NCEA also recommends the inclusion of a proper identification and assessment of cumulative impacts as well as of impacts for the time of decommissioning.

### 3.6 Environmental and Social Management Plan

This chapter, although named ESMP, in its current form does not present an Environmental and Social Management Plan. It proposes measures in very general and descriptive terms, without giving concrete indications of duration, timing, technology, costs, required capacity, responsible persons etc. It places high trust in mitigation of social and environmental risks and impacts through a “regular”, professional project execution (par. 6.3.2, p.214). The NCEA considers this unrealistic, unless a very well elaborated, quantifiable and measureable ESMP is included in the permit conditions. To achieve this, this ESMP should be elaborated now and included in the ESIA approval process.

The ESMP should be presented in a form allowing 1) easy consideration of the acceptability of the proposed plan for the decision maker, and 2) once approved, easy implementation and monitoring. This implies the inclusion of a table including all the above and other parameters making the plan SMART.

The ToR also specifically require the inclusion of an ESMP in the ESIA report, asking for clear definition of the measures, specifying that this means a) a detailed description of each measure, b) conditions for implementation of the measures, and c) designation of the organisation executing each measure. In addition, the ToR specifically ask for the elaboration of an environmental monitoring plan, and explains in quite some detail what is expected of

this plan: clearly linking identified impacts with indicators to measure, methods to be used, frequency of measurements, definition of thresholds, costs and so on. It even asks for the elaboration of specific recommendations to be included as requirements to the enterprises that will execute the project. Currently, the ESIA is not compliant with these requirements in the ToR.

- The NCEA recommends the elaboration of an ESMP, and its direct integration in the ESIA report, conform the ToR. The ESMP should be presented in table form, including measurable parameters (formulated SMART) as asked for in the ToR.
- Similarly and in line with the ToR, the NCEA recommends the elaboration and integration in the ESIA of a detailed M&E plan to monitor implementation of the ESMP. To ensure execution of the ESMP and the monitoring plan, institutional capacity should be identified and appointed as well.

### 3.7 Annexes

If possible, an ESIA should be readable as a stand-alone document, integrating all information necessary for decision making in one single document. Reference can be made to other studies or documents, but one should keep in mind that information made available through another document can easily get separated from the ESIA report and as such become unavailable to the reader.

In the case of this ESIA, several annexes that are announced in the main report are not actually attached to it. These include (annex nr. between brackets):

- the non-technical summary (1)
- ESIA procedure in Senegal (2)
- ToR (4)
- noise modelling results (7)
- Marine Baseline survey results (9)
- coastal process figures (10).

These documents contain complementary information to the main report and make the main report less well understandable if they cannot be accessed. Especially important is the ToR, as this forms the evaluation framework for the ESIA and should therefore be made directly available.

- The NCEA recommends integration of these annexes into the same PDF as the ESIA report.