



commission for environmental impact assessment

Environmental Protection Agency
P.O. Box M326
Ministries Post Office
ACCRA
Ghana

your reference
ACC/OS/TD-ML/482/00
CE. 143/01/44

your letter of
15 December and 26 October
2000

our reference
042-040/Sh/lw

subject
Advisory review of the environmental
impact assessment of the Ankobra
Petrochemical Plant in Ghana

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Utrecht,
16 February 2001

By letter dated 26 October 2001, you invited the Commission for Environmental Impact Assessment (EIA) to advise on an Environmental Impact Assessment Report of the Ankobra Petrochemical Plant in Ghana.

It is my pleasure to submit herewith the advice prepared by a working group of the Commission for EIA. Representing the working group, I would like to draw your attention to the issues mentioned below.

The approach which is usually followed by the Commission, reviewing EIA-reports in the framework of development co-operation, is characterized by key principles like:

- taking the EIA-regulations of the country involved as a starting point;
- establishing a mixed working group with expert from the Netherlands and local experts;
- paying a site visit and organizing opportunities to get the opinion of potentially affected people and relevant stakeholders;
- addressing environmental, social and institutional aspects, thus applying an integrated assessment;
- addressing justification, alternatives and impacts of the project.

This review advice is somewhat atypical because the Environmental Protection Agency (EPA) specifically requested the advice to be as independent as possible and to pay special attention to environmental/technical shortcomings. For the working group this had the following consequences for the methodology applied and for the scope of the advice:

- The Commission decided to draft its own review framework*, instead of using the EPA standard Terms of Reference for the project. It was assured however that the two were not contradictory;
- The Ghanaian experts have not been acting as members of the working group but were performing the role of resource persons, providing factual information only. They did not judge the quality of the report;
- A site visit was not envisaged. This was felt by the mixed working group as a handicap;

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- Assistance in the review of socio-economic issues and the institutional framework was felt less necessary. Therefore, these issues received limited attention in the review advice;
- The (environmental) justification of the project is not specifically addressed. Standard procedure of the Commission would be to also ask for a description in the EIA-report on how the initiative is embedded in for instance an Industrial Masterplan.

The review advice has been prepared in the presence of the Ghanaian experts and discussed with them during their stay in the Netherlands. In addition, the Commission would welcome comments of other relevant Ghanaian authorities on its advice. Especially the Ministry of Environment is invited to provide the Commission with feedback.

The Commission appreciates to be informed about the use that is made of this advice.



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* The Dutch notes on Best Available Technologies
for Mineral Oil Refineries, September 1999,
were very helpful to the Commission

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