

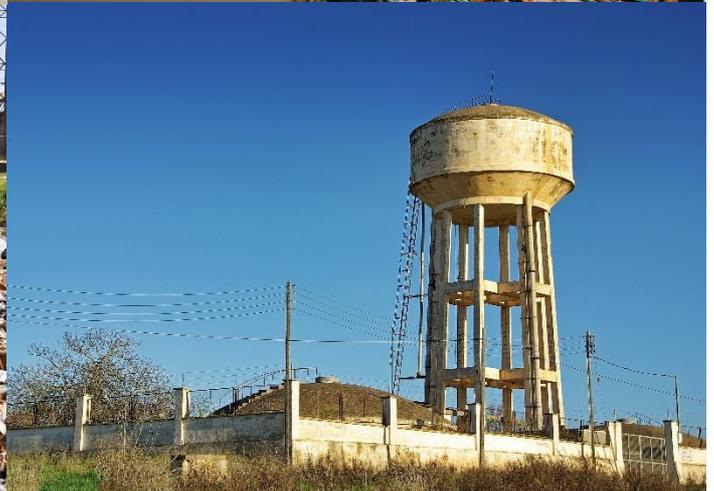


Netherlands Commission for
Environmental Assessment

ETHIOPIA (ORIO09/ET/24)

Quick Scan (Review) of the Environmental Impact
Assessment Report on Expansion and Modernisation of the
Lake Tana Transport Infrastructure Project, July 2014

Memorandum by the NCEA



29 May 2015
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Advice of the Secretariat

To RVO

Attn. Ms Birgitte van de Kerkhof

CC Ms Barry Nieuwenhuis

From The Netherlands Commission for Environmental Assessment (The NCEA)

Date 29 May 2015

Subject Quick Scan (Review) of the Environmental Impact Assessment Report and Economic Impact Assessment and Social Impact Assessment Report on Expansion and Modernisation of the Lake Tana Transport Infrastructure Project (ORIO24/ET/09) in Ethiopia, July 2014

By: the Secretariat of the Netherlands Commission for Environmental Assessment – Ms Ineke Steinhauer, Ms Bobbi Schijf

Advice 2015-11

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1. Introduction

An Environmental Impact Assessment (EIA) report as well as a combined Socio-Economic Impact Assessment Report have been prepared for the Expansion and Modernisation of the Lake Tana Transport Infrastructure Project in Ethiopia. The project is being developed by the Lake Tana Transport Enterprise (through the Maritime Affairs Authority of the Federal Democratic Republic of Ethiopia) and Finance for Projects (through ORIO funding).

The Lake Tana Transport Infrastructure project aims to boost agricultural production, facilitate public and tourist travel to different destinations in the Lake and shore areas, to create employment opportunities and improve the living conditions of local people. It plans to achieve this by upgrading the present ferry infrastructure and facilities at Lake Tana to a more adequate transportation network for passengers and cargo, which is reliable, regular, affordable and safe, and provides frequent services.

The project involves purchase of five (or six? there is some confusion in the documents) vessels (to be assembled locally), one of which contains a dredging facility (which will be used for dredging during the low water season) and undertaking of dredging works, rehabilitation of landing sites, maintenance, training and capacity building. The economic lifetime of the project is 20 years.

The project will be carried out in phases, starting with dredging and (re)construction of landing sites on the western shores. Subsequently, three vessels will be taken into operation and provide services between the two main population centers, with stop-offs at the new landing sites along the Western shores. Meanwhile the dredging and landing sites construction will continue on the Eastern side of the lake. The dredging boat will serve as a ferry boat in the high season (high water) and be used solely as a dredging boat in the low season (low water).

1.1 Approach to this Quick Scan

The RVO, who manages the ORIO facility portfolio, has requested that the Netherlands Commission for Environmental Assessment (NCEA) review the EIA report for the lake Tana project. Usually, the NCEA reviews an EIA report as a stand-alone document, meaning that all information necessary for decision making should be contained in the EIA report, without requiring the reader to consult other documentation to complement gaps in information in the EIA itself. However, in this particular case, the separate Economic and Social Impact Assessment report was incorporated into the review, as this provides complementary information to the EIA report.

Aside from informing RVO decision-making, this EIA review advice can also be used in decision-making by the local authorities (Amhara Bureau on Environmental Protection, Land Administration and Use) on (environmental) permitting.

The NCEA does not express an opinion on the project itself, but focuses on the quality and completeness of the EIA. The NCEA has limited itself to a Quick Scan of the EIA. This advice is

a so-called NCEA 'Advice of the secretariat' and has been prepared based on a desk review only, and therefore does not constitute an in-depth technical review of the EIA report, nor have the contents of the EIA been verified 'on the ground' in Ethiopia. The advice is based on the knowledge available at the NCEA's secretariat. Where shortcomings in the EIA report have been identified, the consequences for decision making are assessed and recommendations are given for any supplementary information that may be needed to address these shortcomings.

In the following chapters, the NCEA first presents key observations in relation to the Ethiopian EIA requirements and the technical contents of the EIA report (chapter 2). In chapter 3, the NCEA elaborates in more detail how conclusions have been reached, by providing observations on each chapter of the EIA report.

2. Key observations

2.1 Conformity with national EIA procedure

In Ethiopia, whether an EIA is required for a project is determined with reference to the list of projects provided under the EIA directive issued in 2008, under article 5 of the EIA proclamation No 229 of 2002. This list indicates both which projects require EIA and which do not require EIA. Additionally, based on the EIA procedural guidelines (non-legally binding), the proponent is responsible for undertaking an initial environmental evaluation (IEE) to determine whether or not a given project requires a full EIA. The IEE report should include location, size of the proposed project, likely impacts and proposed mitigation measures. On the basis of the IEE, the regulator will either: approve the project (with conditions of approval necessary), request a full EIA study, or reject the project outright.

All projects located in environmentally sensitive areas are considered to cause significant impact and require a full EIA process, irrespective of their nature.

The NCEA notes that although the cover page of the EIA for the Tana project titles the document as an 'EIA report', it is in fact an Initial Environmental Evaluation report (IEE). Paragraph 1.5 of the EIA report refers to the revised EIA guidelines for the Amhara region and seems to suggest that "construction of ports and harbours in lakes such as Lake Tana, involving an increase of 50% or more in handling capacity may require a full EIA". The paragraph then continues stating (somewhat cryptically) that "the proposed port development are not and will not be built on the Lake Tana shore which are supposed not to cause significant impacts on sensitive areas of Lake Tana, such as fish landing sites and spawning grounds, biodiversity hotspot sites and associated wetlands at the Lake, historical/cultural sites, soil resources, water quality, flora and fauna and hence falls under Schedule 2 (= Initial Environmental Evaluation to ensure whether the existing ports and new ones still do not require a full EIA)."

■ The NCEA notes that a conclusion is needed on the application of the EIA requirement to the project. Also, the nature of the current report needs to be clarified in relation to this requirement. It is now not sufficiently clear whether dredging and upgrading and construction of landing sites fall under the category 'ports or harbours' and therefore require

a full EIA report. Neither is it clear whether the activities are considered to take place in environmentally sensitive areas, which would also trigger the full EIA requirement. An IEE is meant to provide the information needed by the Amhara Bureau on Environmental Protection, Land Administration and Use (ABoEPLAU) to determine whether a full EIA report is required for (part of) the proposed project activities. The NCEA therefore concludes that the EIA procedure seems to be followed correctly, but that the content and presentation of the report are confusing as to the stage of the procedure. The NCEA advises to double check with the ABoEPLAU if the project is following the appropriate procedural steps, and to confirm the application of the full EIA requirement. Also, the NCEA advises to change the report title to reflect the fact that it is an IEE, and not an EIA according to the Ethiopian regulation.

2.2 Quality of Technical content

Overall, this IEE report provides relevant information concerning the legal, policy and regulatory framework and gives a good insight into the baseline information. However, there is also information missing:

- The project rationale and project description are not complete in the IEE. This information is available in the Economic and Social Impact Assessment report, but has not been summarized in the IEE.
- The information on the nature of the project used in the IEE is slightly different from the project description in the Economic and Social Impact Assessment report (i.e. 9 versus 10 landing sites). This may be due to the fact that the IEE was written earlier.
- It does not become clear in the IEE whether and how the selection for the landing sites has taken environmentally sensitive areas into consideration.
- The specific interventions at each of the 9 (or 10?) locations are not described, e.g. in terms of technical design of the landing site and volumes and frequency of dredging required. This information will be essential to the more detailed impact assessment which is still to follow, and will be the basis for a sound Environmental (and Social) Management Plan and Monitoring Plan.
- Public consultation has reportedly taken place but has not been documented and is therefore not verifiable.

However, as this document is an IEE, the lacunas above need not be remedied in this report, but can be addressed in a subsequent full EIA. Once the exact locations and technical designs of the works are known, such a complete EIA can be prepared. The Economic and Social Impact Assessment report, which contains part of the information still needed, can be incorporated into the full EIA. However, the decision on whether or not a full EIA should be prepared lies with the ABoEPLAU. In case it is decided that no full EIA is necessary, then NCEA strongly recommends that the lacking information as presented hereunder become available before decision making on the project takes place.

- The NCEA recommends that an updated version of the IEE or full EIA report provide additional information to address, as a minimum, the following issues:
 - A better, more complete justification of the project and project activities, interventions and locations is needed, making use of the information in the Economic and Social Impact assessment study;

- The site selection for the 9 (or 10?) locations for project interventions is currently not easily verifiable, especially regarding the consideration of environmentally sensitive areas;
- Public consultation has not been documented and, following the IEE's own recommendation, should take place again before actual project works start, so as to get their views on location and design of landing sites.
- The baseline information is rather comprehensive, but needs to be presented in a more accessible manner. The NCEA recommends using overlay maps, which will help with detailed site selection and further impact assessment;
- Information on alternatives is lacking (in terms of number of landing sites, location of landing sites, technical design of e.g. breakwater and dredging technology). Also a no-project alternative is not provided in the IEE (although available in the Economic and Social Impact Assessment report);
- The environmental impacts are described at a general level, which gives a broad overview of potential impacts related to selection of harbour location, construction (and in particular dredging), operation (boat traffic & discharges and cargo operations & waterfront industry). This chapter should be supplemented with information on what impacts may occur in each of the selected locations *specifically* and what measures should be taken *specifically*.
- Only based on the above information a sound Environmental (and social) Management Plan can be elaborated, based on the current preliminary version in the IEE, including a project and site specific monitoring plan. Both need to be available before project approval or environmental permitting.
- A number of other recommendations is given in chapter 3, but are less crucial to remedy at this stage.

3. Detailed observations per chapter

The structure of this chapter will follow the structure of the IEE report. The NCEA wants to draw attention to the fact that the IEE report has been written in June 2013, before the Economic and Social Impact Assessment report (July 2014). This may explain some of the observations made by NCEA in the following paragraphs. The presentation of two separate reports does not facilitate easy understanding of all impacts associated to this project.

- The NCEA therefore strongly recommends to either bring the two reports in line with each other or even better merge the two into one single report.

3.1 Introduction

The Project background (Par.1.1) describes the project but only in very general terms, mentioning the general purpose and that the project will provide "various services and facilities to the tourists and the communities". The project activities itself are not described and can only be better understood when the Economic and Social Impact Assessment report is read. This background paragraphs, draws the conclusion that "the project is not expected to have any long term negative impacts". The NCEA considers this conclusion premature, given the limited description of the project activities.

- The NCEA recommends to rewrite the introduction, clearly explaining what the project is all about, including the proposed activities, interventions and locations.

The Project rationale (Par.1.2) mainly speaks about provision of harbour facilities, upgrading of existing ports (6) and construction of new ones (3) and focusses on the relevance of these developments for tourism. The project objective (Par.1.3) states that the general objective is to “significantly tap the economic benefits of very high tourism potential ...via constructing and upgrading of ports”. The Economic and Social Impact Assessment report provides much more information on project justification, but also on the project activities. From this report it becomes clear that the project interventions are not only about port and harbour upgrading (which now appears to concern 10 sites instead of 9) and development but also on ferry fleet, landing sites, sailing schedule and routing, demand for passenger transport (not exclusively tourists), demand for cargo transport, pricing and tariffs for transport and even a comparison of other modes of transport and linkage with other infrastructures. The two reports need to be brought in line.

- The NCEA therefore recommends to re-write the project rationale part of the introduction of the IEE, summarizing relevant information from the Economic and Social Impact Assessment report (e.g. chapter Expansion and Modernization of Lake Tana Transport, the story line p 2–5 and p. 24–35 on Economic returns). Otherwise a reader of the IEE report will have a limited understanding of the activity, when it is in fact much wider in scope and objectives than currently described. Par.1.3 should also be re-written to fully cover all project objectives using the information from the Economic and Social impact assessment report on Lake Tana transport, present situation ambition, and proposed investment p.6–23.

3.2 Legal, policy and regulatory framework

The NCEA observes that in Par. 2.1 reference is made to public consultations that took place at the kebele level. However, this is not further documented in the IEE nor in any annex to the IEE.

- The NCEA recommends to provide information on public consultation at kebele level, including the results thereof and how observations and concerns have been taken into account in project design or assessment. It is also recommended to draft a public consultation plan for the (pre-) construction phase, as at this stage important major negative impacts could occur, especially of the ports to be newly constructed, in terms of possible relocation of people, and impact on their properties, agricultural land and cultural heritage sites. P. 44 of the Economic and Social Impact Assessment report gives some information on Land acquisition, land use, involuntary resettlement, and change of livelihood which can be used for this.

In Par. 2.3.3 regarding solid waste, there is a reference to a Beach Resort project component and installment of septic tanks etc. However, this seems to be an error as project is not about a Beach resort. Par. 2.3.4 about preservation of cultural heritage, states that “guests/tourists shall be advised to avoid visiting sites that have restricted access due to cultural sensitivity”. Again, this recommendation seems to belong to another project. As an aside, “shall be

advised” is weak recommendation, and would not be an effective measure to manage such an impact.

- The NCEA recommends to delete information which is not relevant to this project.

Par. 2.3.5 regarding fisheries, the IEE states that “during the site selection process, protected fisheries areas in Lake Tana, such as river courses and tributaries, 5 km radius in all direction from the point of confluence of rivers with Lake Tana and Blue Nile River from the outlet of river along 39 km to Blue Nile fall will be considered”. This is a clear parameter for site selection and construction (see also NCEA recommendations in 3.3. below) and needs to be reflected in the final project design.

3.3 Resource Baseline information

Fig. 3 on p. 22 is a map showing the existing land use/land cover of the study area, including cultivation areas, but also natural forests and wetlands along the Lake Tana shoreline. Wetlands are environmentally sensitive areas, and from this map it cannot be determined whether the new to be built landing sites will potentially affect these areas.

Par. 3.1.5 about soil resource condition addresses siltation of the Lake due to high sediment loads of the rivers draining into the Lake. However, this information is not quantified (e.g. in m³/year). This is relevant information needed to estimate the volumes and frequency of dredging activities (which are part of the project activities).

Fig. 4 on p. 24 shows a map of 60 temporary and permanent rivers and streams draining into Lake Tana. The IEE highlights, in the same paragraph, the important functions of these rivers, for example, as spawning areas of fish. Therefore it is crucial to check whether the project activities will overlap with these areas and if so, what mitigation measures will be taken to address impacts.

Tables 2 to 4 and 6 to 12 show data on water quality. These are not further analysed. The only observation given is that the PH is somewhat high and that this could be dangerous for fish and that “care should be taken during harbour construction”. No concrete recommendations are given regarding the way this should be done. Fig. 10 on p. 40 gives a summary map of water quality parameters (relevant for fisheries) and concludes that the whole of Lake Tana is of good quality, with only some areas characterised by minor pollution. Water quality therefore does not seem to be an issue, but this conclusion is not clearly drawn.

Par. 3.2.1 provides information on forestlands, and indicates that these also contain species which are endemic, rare and/or threatened with extinction. The 6 areas where forestlands can be found are mentioned, but not shown on a map. Therefore it is difficult to check whether the existing and new landing sites could overlap or affect these areas.

Par. 3.2.2 makes an inventory of mammals, birds, fish, reptiles and amphibians. The results for the first 3 categories show the importance of Lake Tana (eg. hippos, areas assigned as Important Bird Area, and endemic fish species). In 3.4.1 similar information is given, so it would be better to merge these two paragraphs.

Par. 3 provides data about the socio-economic environment: rural livelihoods (crops, livestock and off-farm activities) and continues with an extensive description of existing and potential tourist areas and attractions (8 development corridors) in and around Lake Tana. These areas are presented on a map Fig. 14, p.46. Each area is described in terms of a list of attractions and a short assessment of the current use/visits by tourists and factors that hamper further tourism development. There is a separate paragraph (3.3.3) assessing existing and required tourist services (like accommodation, tour, travel and information services) and infrastructure (transportation, waste management, telecommunication, water and electricity supply). The water transportation part is the one most relevant for the ORIO project, and indicates that both ports and boats are of very poor quality, from a tourist perspective. This paragraph therefore contains quite some information which is not relevant for this project.

Par. 3.4.1 describes Environmentally Sensitive Areas: wetlands and bird habitat areas, protected fish habitat areas, hippo colony habitat, natural monuments, protected core and buffer zones, important scenic values, and the Bahir Dar Blue Nile Millennium Park. These areas are shown on maps Fig. 16–24. It also describes the main threats to these areas, such as agricultural expansion, overgrazing, deforestation, uncontrolled fishing and invasion of exotic species. As noted before, the information should be presented in a way which makes it more easy to determine whether the landing sites are planned in or near these areas.

■ The NCEA concludes that part of the baseline information is superfluous (like extensive water quality descriptions and all kinds of tourism requirements), probably due to the fact that the baseline information (chapter 3) is provided in the IEE before the project description (chapter 4). At the same time, certain necessary quantitative information is lacking, e.g. on sediment loads and volumes (information which is needed to plan dredging activities). The baseline information makes clear that there are various environmentally sensitive areas, each of which is presented on a separate map. NCEA recommends to put all this information together in one overall map which then can be (also) used for site selection of new ports.

3.4 Description of the proposed project

Par. 4.1 Project Site Description starts with mentioning that all environmentally sensitive areas have to be taken into consideration when selecting sites and before project development and operation begins.

Par. 4.2. gives a description of the project features, and distinguishes between upgrading of port capacity (at 6 locations) and new ports to be built (at 3 locations). Table 15 provides a list of 17 existing major, minor and proposed ports, also shown on a map in Fig. 31. The selection for the ports that are part of the ORIO project is said to be done based on 3 criteria: (i) high tourist destination location, (ii) away from river deltas and (iii) the distance to the nearest harbour. Apparently only the river deltas have been considered, not all the environmentally sensitive areas.

■ The NCEA recommends that the proponent better substantiate how the 9 locations were selected from the 17 potential ones in total. The proponent should either make clear show how environmentally sensitive areas have been considered, or demonstrate that these will not be affected. This can be easily done making use of the overlay of maps from the baseline (see NCEA recommendation 3.3.).

The NCEA also notes that the project description is incomplete as it only covers harbour development and not the provision of a ferry fleet etc. (see NCEA recommendation made already in 3.1 Introduction). Moreover, the specific interventions at each of the 9 locations are not described, e.g. in terms of landing site technical design.

■ The NCEA recommends to provide more technical details on the range of interventions and activities that are part of the ORIO project at each of the 9 sites. This is needed in order to be able to develop alternative designs and/or dredging technologies, but also to assess impacts at each of the individual locations. For the sake of efficiency, the proponent could concentrate only on the most relevant sites, leaving out those that will not be further pursued.

The IEE does not provide any information on alternatives at all. At the very least, the 'no-project' or 'business as usual' scenario needs to be elaborated in an assessment.

■ The NCEA recommends to describe the no-project alternative or scenario. The "with or without analysis" (p. 39 of the Economic and Social Impact assessment) gives useful information on this issue.

3.5 Environmental impacts and mitigation measures

Par. 5.1 starts with a general description of the expected positive impacts of the project, such as promotion of sustainable and reliable tourism, improved access to markets for local people, more employment and better access to health care and other social services.

Par. 5.2 mentions that "although the project is supposed to have insignificant environmental impacts as indicated in the project description, the following sections elaborate on possible impacts and measures to consider in advance in different phases of the project". These phases are location (5.2.1), construction (5.2.2) and operation (5.2.3). For each of these phases, 8 categories (water quality, lake shore hydrology, bottom contamination, lake shore ecology, waste management, air quality, noise and vibration and socio cultural impacts) are described in terms of the potential impacts and possible mitigation measures.

Although these descriptions are correctly pointing to the most important impacts and risks associated with harbour construction and operation in general, they are not made specific for the selected harbour sites which are part of the ORIO project. Descriptions are made in terms of what 'may' happen. By way of example, the mitigation measures suggested to remedy the impacts of the location of the harbour on water quality are copied here: "Carefull site selection and harbour design should be carried out, focussing on the possibility of water stagnation. If the basic pollution level is critically high, a sewage treatment system should be planned as part of environmental management of the area. Regulations on discharges of

effluents into water and provision of sanitary treatment facilities are indispensable for reducing pollutants from hinterlands. In a polluted harbour, it could be effective to dredge or cover contaminated bottom sediment capping to reduce the flux of pollutants from the sediment to the water.”

This is too superficial. The IEE should provide a detailed description and analysis of impacts and mitigation measures, for each of the 9 locations (6 upgrades and 3 new to be constructed harbours). To illustrate: “Careful site selection and harbour design” needs to be translated into clear parameters that can be applied in practice. Pollution levels in a particular location need to be provided and compared against relevant quality standards. Clear conclusions should be drawn on the need for sewage treatment system, and the level of treatment needed .

The chapter on impacts in the report rather has the character of a scoping document: it sets out impacts that *may* occur, mitigation measures that *could* be taken, surveys and inventories that *should* be undertaken beforehand etc. Par. 5.2.1.6 on socio-cultural impacts even gives a list of information that should be provided ‘during the evaluation stage of a development project’, such as distribution of population around the project area, resettlement of local people, presence of cultural heritage etc. This information needs to be available for each of the 9 locations before decision making on the project, either as part of an updated version of the IEE or as part of the full EIA.

Good practice EIA follows a certain logical process from 1) identification of impacts, 2) assessment of the importance of impacts, 3) development of measures to mitigate impacts. Jointly, this then provides the necessary input for the chapter describing the environmental (and social) monitoring and management plan. The impacts chapter of the IEE does identify impacts, but an assessment of their importance is missing. Also, the chapter contains propositions for mitigation measures for each category. This leads to quite some reiteration of similar mitigation measures for different categories. Therefore in this case, it would be better to present the measures in a separate chapter to allow first an appreciation of impacts of the project interventions as a whole, then an appreciation of the project including mitigation measures. This way a decision maker can better to understand any residual impacts .

- The chapter on environmental impacts and mitigation measures gives a broad overview of potential impacts related to the selection of harbour location, construction (and in particular dredging), and operation (boat traffic & discharges and cargo operations & waterfront industry). The NCEA recommends to extend this chapter with information on what is expected in each of the selected locations specifically and what measures should be taken at that site. This could also lead to some restrictions for the project activities, for instance that no construction activities can take place during the breeding season/fish spawning. The NCEA also recommends to restructure the information on impacts in this chapter, as follows:
 - Start with a separate paragraph called Identification of impacts, listing the potential impacts of this project;
 - Continue with a separate paragraph containing a step by step assessment of each of the identified impacts, including a justification of the assessment conclusions. Provide an overview of identified impacts and their importance;
 - Include a paragraph identifying mitigation measures for each of the impacts;

- Then conclude with a summary table allowing easy overview of impacts, their importance and ways to mitigate them.

3.6 Environmental management and monitoring plan

The Environmental management plan summarizes in tabular form some of the recommended mitigation measures from chapter 3.5. and indicates responsible institutions for each of these tasks (consultant, design team, project proponent, contractor, boat captain and ABoEPLAU). However, the plan it is not further detailed in terms of a timeline or cost implications etc.

Par. 6.2 gives a preliminary environmental monitoring plan, also in tabular form, presenting “*potential* general indicators/parameters that *could* be used... the appropriate specific indicators/parameters shall be selected to the specific context, specific sites and major anticipated impacts”. In its current form, the Environmental monitoring plan is only elaborated in very general terms and therefore not sufficient. One of the locations proposed for monitoring is an Eco-logde project site, which again gives the impression that this IEE perhaps has been copied from another project.

■ The NCEA recommends the further elaboration and detailing of both the environmental management plan and environmental monitoring plan. These should be presented in a form allowing 1) easy consideration of the acceptability of the proposed project for the decision maker, knowing the residual impacts and 2) once approved, straight-forward implementation and monitoring, including designation of the organisations executing each measure, timelines and the necessary budget requirements. Monitoring indicators that could be relevant are for instance: the turbidity near the dredging sites, the fish catch, the changes in livelihood/employment as a result of the works, and the potential morphological changes at the shoreline.

3.7 Conclusion

The conclusion gives some specific recommendations of each of the 9 sites, but these are virtually identical: “applying silt curtains during dredging as well as a careful selection of the dredging method referring to an annex which outlines some dredging methods that effective in minimizing dispersal of resuspended sediments”. This annex is however not included. The conclusions also states that with the application of the suggested mitigation measures, the environment will be sufficiently safeguarded. Finally a recommendation is given that the community involvement process be continuous.

■ The NCEA is of the opinion that this conclusion is not warranted as not all the necessary information on the specific sites has been provided yet. Such conclusions can only be drawn based on an updated version of the IEE (or even a full EIA if the ABoEPLAU would so decide). It is also recommended to include some of the conclusions drawn in the Economic and Social Impact assessment on social impacts (private sector development, employment, pro poor impact, etc).