

Luxembourg, 11th December 2024

Environmental and Social Completion Sheet (ESCS)

Overview

Project Name: SNIM VIII
Project Number: 2015-0008
Country: MAURITANIA

Project Description: The project consists of the dredging works related to the deepening

and enlargement of the access channel to the Port of Noadhibou 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.

Summary of Environmental and Social Assessment at Completion

EIB notes the following Environmental and Social performance and key outcomes at Project Completion.

The main impacts identified on the ESIA at the construction phase were: 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 to gas emissions from the construction equipment; increase of noise and vibration levels, both aerial and underwater, impacts on fauna and flora by collision.

For the operational phase, the main impacts acknowledged on the ESIA were 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.

The Promoter confirmed that the project was developed according to the requirements defined in the ESIA and related ESMP and the Bank's Services are not aware of any outstanding environmental issues or pending claims related with this project.

Social Assessment

The main adverse social impact identified at appraisal was related to a temporary economic displacement/loss of livelihood of the local fishermen community in the Noadhibou Bay. An assessment of the direct impacts of the works in the local fishing activities was performed and integrated in the ESIA. The main impacts identified were 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 Promoter confirmed that the project was developed according to the requirements defined in the ESIA and the Bank's Services are not aware of any outstanding social issues or pending claims related with this project.

The following disbursement conditions were applicable at the time of project appraisal:



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- The Promoter shall submit to the Bank the summary of the official public consultation held by the Competent Authority (*Zone Franche de Noadhibou*) during July and August 2017. The Promoter provided such summary to the Bank prior to the first disbursement;
- 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. The Promoter established such contract as required the Bank prior to the first disbursement;
- 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. The promoted provided the Bank with a satisfactory ESMP including the additional requirements prior to the first disbursement;
- A Stakeholder Engagement Plan will be done as part of the ESMP. The promoter provided the Bank with a satisfactory SEP prior to the first disbursement;
- 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 promoted provided the Bank with the
 required declaration prior to the first disbursement;
- The promoter will include provision for the respect of ILO conventions in the contractual documents for works. The promoter provided evidence to the Bank of the provision of such clauses prior to the first disbursement;
- The Promoter shall undertake an independent labour audit to the project related works with the support of an external consultant. This condition was linked to the last disbursement, which was cancelled by the Promoter and therefore this could not be checked at disbursement. The Promoter informed the Bank that this was "in progress" but no further details were provided.

The following undertakings were applicable at the time of project appraisal:

- 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. The Promoter has reported regularly to the Bank on the compliance with the requirements of the ESMP. The Bank has not received to this date any notice of unexpected impacts or accidents during construction;
- During the construction works the promotor should monitor and give regular updates
 on the respect of the fulfilment of ILO conventions by main contractors and
 subcontractors. A related contractual clause was included in the construction
 (dredging) contract signed with the main contractor. The Promoter informed the Bank
 that an external audit as in progress.

Summary opinion of Environmental and Social aspects at completion:

EIB is of the opinion based on reports from the promoter and/or inputs provided by Lenders' Supervisors and others, where applicable, during Construction that the Project has been generally implemented in line with EIB Environmental and Social Standards, applicable at the time of appraisal.