



commission for environmental impact assessment

Attn of Ms G. Dommerholt  
Sub-Saharan Africa Department  
Western Africa Division  
Postbus 20061  
2500 EB Den Haag

your reference  
DAF 99/804

your letter  
21 June 1999

our reference  
U150-99/Po/sg/033-362

subject  
Advisory review of the environmental  
impact statements of the Chad Export  
Project in Chad and Cameroon

direct phone number  
+31 30 234 76 49

Utrecht (The Netherlands),  
22 October 1999

Dear Ms Dommerholt,

The Dutch Commission for Environmental Impact Assessment (EIA) was invited by a letter dated 21 June 1999 to carry out an advisory review of the EA-study and other relevant documents on the Chad Export Project.

I therefore submit the advice prepared by a working group of the EIA Commission.

I would like to draw your special attention to the issues raised below.

- a) I am aware of the fact that the project will generate considerable economic benefits for Chad and Cameroon and could result in improved living conditions for population groups in both countries. However, I think that due to shortcomings in the information currently available, the basis for decision-taking can still be considerably improved.

Addressing the main shortcomings described in our advisory review will not just be a matter of field experts collecting the lacking information. The majority of the issues raised by our review specifically touche upon the responsibilities of the Chad and Cameroon governments in the project. Satisfactorily settling these issues will probably require intensive communication and these results will probably not be able to be achieved overnight.

- 1) If the decision is taken to provide the additional information we propose prior to approval of the project, I suggest to consider tiered decision making.

In the first tier, the decision to approve the project could be made after:

- a positive independent review of additional information on:
  - the objectives of all project proponents;
  - assessment of which proponents are committed to execute the initiative in compliance with the EA;
  - capacity development, oil spill response and monitoring;
  - a comparison of an alternative of an on-shore loading station in Limbé versus the FSO at Kribi;
  - the socio-political risks (sabotage) and effective mitigation thereof;
  - the residual impacts after project execution, in compliance with the environmental management plans;
- the acceptance of independent external monitoring meeting the standards to be set by the World Bank and your ministry.

If, after this tier the decision is taken to approve the project, in the second tier a decision can be made on disbursement of the project loan or other loans (in the framework of the Country Assistance of the World Bank to the respective governments). This decision may be linked to effective establishment of the necessary legislative and regulatory framework and establishment of effective implementing, monitoring and enforcement capability in the respective countries.

- 2) If the decision is taken to approve the project before the referenced additional information is made available, I would like to recommend to ensure at the earliest possible date:
- establishment of an independent external monitoring and reporting facility in the form of an International Advisory Group (IAG);
  - publication and public independent external review of the project proposals for external monitoring and for capacity development for implementation, monitoring and enforcement that will be submitted to the World Bank by the Governments of Chad and Cameroon;
  - evidence of the commitment of TOTCO, COTCO and EECPI and the governments of Chad and Cameroon to the contents of the EA;
  - publication and independent review of the oil spill response plan for the project;
  - a substantiation of the selection of the Kribi offshore terminal in comparison to the Limbé on-shore terminal alternative.

Before the oil transport system becomes operational I would like to recommend that you ensure:

- the provision of financial guarantees for compliant execution of EMPs in the operational phase in case oil prices are low, preferably in the form of a special fund designated at that aim;
- the establishment of an effective, verifiable and tangible link between the quality of life of the population living in the transport system area and the undisturbed functioning of that pipeline.

b) I am aware that the partners in the Consortium may have different, publicly promulgated levels of commitment to environmental and social issues. I assume that project performance on environmental and social issues would have to comply with the published commitments of all of the partners (if the project would not be compliant, one might expect the relevant partner to withdraw from the partnership). I would like to recommend that the partner designated to operate the project be invited to demonstrate that project performance will, indeed, be compliant with the social and environmental policy of all the partners.

The Commission would appreciate being kept informed about the use that is made of this advice and offers to assist in defining tasks and competencies of an IAG.



Prof. Dr. Ir. D. de Zeeuw,  
Chairman of the working group on  
the Chad Export Project,  
Chad and Cameroon

cc: Ms A. Wevers, Environment and Development Department, Ministry of Foreign Affairs of The Netherlands