



Netherlands Commission for
Environmental Assessment

Comments on the Draft Permit for the West African Gas Pipeline

Memorandum by the NCEA

24 January 2005





commission for environmental impact assessment

Advice of the secretariat

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Subject : Comments on the draft permit for the West African Gas Pipeline
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1. Introduction and request for advice

At the request of the Environmental Protection Agency (EPA) in Ghana, the Commission for Environmental Impact Assessment has reviewed the EIA report for the West African Gas Pipeline (WAGP) in April 2004. Subsequently, an advice has been published by the Commission on the Addendum 1 of the EIA report in August 2004. By e-mail dated 17 December 2004, EPA invited the Commission to give input and comments on the draft-permit for the WAGP, that has been prepared by EPA.

2. Observations and comments

The proposed schedule to the environmental permit covers most subjects raised by the Commission, especially for the construction phase of the project. The schedule seems to be less detailed on environmental issues in the operational phase.

Environmental permits for projects like the WAGP ideally should contain strict provisions to enable monitoring of the project by the relevant authorities to ascertain compliance to regulations, permits and agreements. Experience has shown that if these are agreed upon beforehand, a minimum of problems will occur. Although some provisions in this vein have been included in the permit, EPA may want to consider the following:

Construction phase:

- Explicitly mention the principle of prior notification of the relevant authorities to enable the monitoring of critical steps in the construction process. The authority can then decide if it wants to witness or inspect the activity of WAPCO. For this, the project planning (and updates thereof) needs to be made available. Also prior notification (f.i. 2 weeks before starting or ending the activity) could be required for environmentally sensitive activities.

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- Explicitly mention the intention of relevant authorities to inspect and/or witness various phases of the project.
- Explicitly mention which documents will have to be submitted to EPA, before starting disruptive activities.
- Make explicit the facilities WAPCO is expected to provide to EPA for monitoring and inspection: transport, access, office facilities, lodging facilities etc.

Operational Phase:

- Prior notification (2-4 weeks) of environmental authorities of special operations such as maintenance and/or modification works of the pipeline and installations.
- Reporting arrangements for malfunctions/accident/incidents to relevant authorities.
- Make explicit the facilities WAPCO is expected to provide to EPA for monitoring and inspection: transport, access, office facilities, lodging facilities etc.

As stated above, the permit indicates many relevant aspects, which the client has to carry out. However, a few aspects need to be included:

- There is no information on the protection of the pipeline systems and apparently no risk analysis has been carried out. As the two pipelines are rather close to the port areas of Tema and Takoradi (many and large ships), the risk is highest at these locations. So the harbor authorities have to set-up a safety system for both the pipelines and the ships. This needs to be discussed in detail with WAPCO and results should be included in the permit.
- Another aspect is that the permit for the execution of the works needs to be based not only on the EIA but also on the method statements and the equipment of the contractors. As different types of tools and methods can be applied for the offshore part, the shore-crossing and the onshore part, specific requirements need to be included in the permit. For example: the shore crossing can be done by grab dredgers, or cutter dredgers, or blasting techniques or horizontal directional drilling (HDD). In case of HDD, specific chemicals will be used during the drilling process which can pollute the groundwater.

Therefore, the Commission recommends to present the permit for the project after the risk analysis for the pipelines has been done, and specific additional permits will be required for the contractors.

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