



Netherlands Commission for  
Environmental Assessment

## MOZAMBIQUE (D2B1 7MZ08)

# Advisory Review of the Scoping Report for the ESIA for the Water4Nampula Project

## Part I: Nametil and Namapa



16 July 2021  
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## Advisory Report by the NCEA

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<b>Title</b>	<b>Advice on scoping for the ESIA for the Water4Nampula project Part I: Nametil and Namapa</b>
<b>To</b>	Netherlands Enterprise Agency (RVO.nl) / D2B
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<b>Request by</b>	Netherlands Enterprise Agency (RVO)
<b>Date</b>	16 July 2021
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## Table of contents

1.	Introduction.....	2
1.1	The project & request to the NCEA .....	2
1.2	Summary of Nametil and Namapa project interventions .....	3
1.2.1	Nametil.....	3
1.2.2	Namapa .....	3
1.3	Approach by the NCEA .....	4
2.	Summary conclusions and recommendations.....	5
2.1	ESIA as a decision making tool: process and form.....	5
2.2	Shortcomings to be addressed or requiring better assessment.....	6
3.	Key findings and recommendations.....	7
3.1	ESIA team (sections 2, 4.3.1 and 11.10).....	7
3.2	Indirect area of influence (section 3).....	7
3.3	Land use and landownership (section 3.3.2 and section 4.4).....	7
3.4	Project activities and intervention options (section 4).....	8
3.5	Biophysical and socio-economic setting (section 5) .....	9
3.6	Impacts (section 6 and 8) .....	10
3.7	Alternatives and choice of option (sections 3.3.1, 6.6 and 9).....	12
3.8	Terms of Reference (section 11) .....	12
4.	Detailed observations.....	13
4.1	Nametil.....	13
4.2	Namapa .....	13
4.3	For both Nametil and Namapa.....	13
	Annex 1: IFC Performance Standards.....	14

# 1. Introduction

## 1.1 The project & request to the NCEA

The Government of Mozambique (GoM) received funding from the Government of the Netherlands, through the Netherlands Enterprise Agency (RVO), for the Water4Nampula project. The project involves the rehabilitation and expansion of the water supply to the four towns of Nametil, Malema, Namialo and Namapa in Nampula Province. The Administração de Infraestruturas de Água e Saneamento (AIAS) of the Ministry of Public Works, Housing and Water Resources is the Executing Agency for this project.

The current challenges are low water and sanitation infrastructure coverage, and inadequate maintenance and operation of the existing bulk and potable water facilities. There is a scarcity of water to the users reliant on the existing schemes and an insufficient capacity to meet the projected future demands and intended expansion of the schemes towards improving access to water of potable standards. The schemes have also been impacted by in-operational or non-existent treatment facilities. To address the status quo and to provide for the future growth in water requirements, the intention is:

- to expand the current reach of the schemes and to improve the assurance of supply through the development of new water sources; and
- to rehabilitate and expand the bulk water supply infrastructure, treatment capacity, storage and distribution network.

The intended results will be a sustainable water supply scheme to the four towns, capable of delivering water of the required quality, at an acceptable assurance of supply, and to a wider water user group than is currently the case, thus contributing towards alleviating poverty, improved health and hygiene conditions, and the quality of life of the population (in particular vulnerable groups).

For each town standalone deliverables are envisaged, consisting of:

- A feasibility and conceptual design study of the water supply system;
- An Environmental and Social Impact Assessment (ESIA); and
- Detailed designs and tender documents.

In Mozambique, the procedural requirements for ESIA are provided by the Environmental Impact Assessment Regulations, Decree 54/2015. According to the Decree, information needs to be provided to the Ministry of Land and Environment (MTA) so that a pre-evaluation of the project can be performed to determine what ESIA requirement and category is applicable, i.e. a full ESIA (for Category A+ and A), Simplified Environmental Assessment (Category B), or no specific environmental assessment required (Category C).

Although no information has been provided with regards to the project Category, the scoping study and ToR follow the approach for a Category A project. Thus, it is assumed that the project has been categorized as Category A, and in agreement with Annex II of the Decree: (Category A: 2.1 Infrastructure (a) All activities that require resettlement and/or (m) Water pipelines > 0.5 m diameter and longer than 10 km).

For a category A-project, a scoping study (or EPDA, Estudo de Pré-Viabilidade Ambiental e Definição do Âmbito) is required to determine whether the project has 'fatal flaws' and what

needs to be assessed in the ESIA. A ToR for the ESIA needs to be submitted together with the scoping study to MTA. The ESIA can subsequently start upon approval of both by the MTA.

For each of the four towns, an ESIA scoping study/ToR for the final ESIA has been prepared in conjunction with the feasibility study and conceptual design phase. The scoping study needs to meet the content requirements specified by the Mozambican EIA Decree<sup>1</sup>. The scoping study/ToR will be discussed with AIAS and RVO and presented to stakeholders in a workshop together with the feasibility study. As part of the scoping study/ToR, an IFC Performance Standards gap analysis was also requested by RVO. The outcomes of the feasibility study and the scoping study/ToR will inform RVO and potential other donors in the go/no go decision regarding the project for each town.

The RVO requested that the NCEA independently review the scoping study/ToR. Once these are approved by AIAS, MTA and RVO, the project will move to the next phase in which the final designs of the water systems and the full ESIA's will be developed.

NB: At the stage of drafting this advisory report, the NCEA only received the Scoping studies/ToR for Nametil and Namapa. Once the scoping studies/ToR for the other two towns become available, the review of their quality will be presented in a separate report.

## 1.2 Summary of Nametil and Namapa project interventions

### 1.2.1 Nametil

Nametil is the village headquarter of Mogovolas District, located in Nampula Province. The population of Nametil is around 55,046 inhabitants. The Nametil water supply system consists of abstraction from the Meluli River through a dike and catchment well, a treatment plant, about 500 household connections and 18 public standpipes. Planned interventions are:

- Upgrade of water abstraction point
- Upgrade and expansion of water treatment plant
- Construction of bulk storage reservoirs
- Interventions on the transmission mains
- Extensions of the distribution network

### 1.2.2 Namapa

Namapa is the village headquarter of Eráti District, located in Nampula Province. The population of Namapa is around 52,500 inhabitants. The existing water supply system has been in disuse since 2005 with no connections being used through the network. The majority of the village population uses water extracted directly from the Lúrio river and/or five manual pump wells/boreholes around the village. Planned interventions are:

- Selection of water abstraction points and subsequent water intake construction
- Installation of water treatment compound
- Construction of bulk storage reservoirs (ground reservoir and/or elevated tanks)
- Interventions on the transmission mains
- Improvement and extension of distribution network

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<sup>1</sup> See: <https://www.eia.nl/en/countries/mozambique/esia-profile>

### 1.3 Approach by the NCEA

In order to carry out this review, the NCEA formed a working group with members covering different areas of expertise, including water and sanitation, water governance, environmental and social performance management, social sciences and ESIA application. The composition of the working group and the background of the individual experts are presented in the Colophon. Because of Covid-19 and resulting travel restrictions, the NCEA working group was unable to visit the project area to interact with various institutions/stakeholders and perform site verifications. It has been agreed with RVO that a site visit can still take place when the NCEA would be requested to also review the full ESIA reports (in case of a favorable go/no go decision by RVO and AIAS).

The focus of the NCEA's review and advice is on the scoping studies/ToRs for the ESIA for the intended projects. The working group members also considered other documents because these contained relevant information to better understand the scoping studies/ToR, such as the project's inception report (March 2021), and the Feasibility and Conceptual Design Study, including Annex for Nametil (June 2021). However, the NCEA did not assess the quality of the latter documents and does not draw conclusions on their adequacy.

As benchmarks for their review, the working group made use of the following:

- Mozambican EIA regulations: Decree 54/2015
- International Finance Corporation Performance Standards (IFC PS) (2012)
- Working group members' expertise in reviewing ESIA's for comparable projects.

The purpose of the review and recommendations by the NCEA is to advise and guide the proponent and the consultants in carrying out an ESIA that is complete, correct and relevant for decision making and includes a transparent and inclusive process. Note that the working group does not express an opinion on the feasibility or acceptability of the project itself, but comments on the project impacts and quality and completeness of the scoping study/ToR.

Chapter 2 highlights several strengths of the scoping studies/ToR and provides a summary of important shortcomings. These are shortcomings that according to the NCEA need to be addressed before moving to the next phase of the ESIA. Chapter 3 describes these key findings in detail and gives recommendations. In chapter 4, some detailed (less-essential) observations are provided. In Annex 1 the NCEA presents a brief analysis of whether and how the IFC PS have been addressed in the scoping studies/ToRs. In chapter 3 the NCEA also specifically indicates the IFC PS relevance in relation to its recommendations when relevant.

## 2. Summary conclusions and recommendations<sup>2</sup>

The NCEA observes that relatively good efforts have been undertaken in order to develop the scoping document and ToR under review. The NCEA is positive about the following:

- The need for the projects is well established and the expected positive effects of access to water supply are well justified;
- The scoping document is in accordance with the content requirements for scoping/ToR in the Mozambican EIA Decree 54/2015, except for the inclusion of a report on public participation. A public meeting is however planned to take place to present the scoping report/ToR. It is unknown to the NCEA whether this has meanwhile taken place;
- The explanation of the methodology to be used for assessment of impacts and alternatives is very good. Normally, such detail is not provided during scoping.

The NCEA sees a red flag for the water abstraction at Nametil. The analysis in the scoping study shows that during parts of the year the current storage volume is insufficient, meaning that part of the year the system will have no water. The effects of that on the water users in Nametil, as well as on the downstream water users along the Meluli river are expected to be grave. Effects can also impact biodiversity, ecosystems and living natural resources. Without clarity on the issue, it will be hard to move the project – and the ESIA – forward in an understandable and justifiable way.

Although it is not within its scope of our analysis, the NCEA would like to stress another issue related to goal attainment of the project and the link between feasibility/design and scoping study/ToR. The project can only be successful if certain pre-conditions and induced impacts are also taken care of, such as (assessment of) maintenance capacity, willingness/ability to pay for water, the need for also addressing waste water treatment and sanitation, institutional issues etc. Currently these are not part of the project scope: the focus is mainly on infrastructure works related to providing access to water.

In addition, the NCEA identified some other shortcomings of which the key ones are elaborated below. Details are provided in Chapter 3.

### 2.1 ESIA as a decision making tool: process and form

- A legal and institutional framework chapter is missing, indicating which legal instruments guide the document and the project and which International Standards, such as the IFC PS, apply. Although this is not required at the scoping stage according to Mozambican regulations, the NCEA noted that Annex D to the feasibility study for Nametil contains this information already to a large extent (p. 16–36). In addition, the feasibility studies outline the process to guide the consultant through the different ESIA steps, and (approval) decisions to be taken (e.g. by RVO but also by MTA and AIAS). This information is not included in the scoping document.
- Most of the maps are unreadable or lack legends (details provided in Chapter 4), which hampers the accessibility and understanding of the information to the reader.

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<sup>2</sup> For both Nametil and Namapa

- The NCEA recommends to:
  - include in the scoping report a gap analysis benchmarking local environmental and social requirements against the IFC PS, as was also requested by RVO;
  - include a legal and institutional framework chapter, following best practice;
  - provide a clear outline for the ESIA process and its integration into project planning, design and decision making. An indicative schedule of implementation for the short, medium- and long-term works may be helpful too;
  - present clear figures, tables and maps of the project's target area, planned infrastructure and locations, indicating sensitivities, impacts and solutions.

## 2.2 Shortcomings to be addressed or requiring better assessment

- The ESIA team seems to lack specific expertise on land issues, compensation and resettlement.
- The boundaries of the direct and indirect areas of influence seem to be chosen without a clear justification.
- Land use and land ownership is described ambiguously, which may cause problems with compensation or resettlement later on. It is therefore not clear whether a resettlement action plan and/or livelihood restoration plan will be required.
- The information on project activities is not complete, for instance on amounts of water to be abstracted, dimensions and characteristics of the dike/dam and size and location of construction camps.
- The baseline descriptions are generally too shallow, in particular the biotic and socio-economic components. Also there is no reference to extreme events in the area like floods, droughts, cyclones.
- Conclusions on impact significance are in some case not understandable, neither transparent nor complete, which may have consequences for the conclusion in the scoping documents that there are no fatal flaws. Impacts especially on the biodiversity/ecology are only described very briefly and those in the socio-economic domain are incomplete.
- Alternatives/options are considered to some extent, although the various options are rather similar and do not differ greatly in terms of environmental and social impacts. However some other alternatives, for instance on options for alternative water abstraction points or phasing alternatives in the reticulation networks are not identified/assessed.
- The ToR are rather generic and not tailored to the findings of the scoping study. They also show inconsistencies with the scoping study: for example ecosystem services feature in the ToR, whereas they are not mentioned in the scoping document. Another example is the Stakeholder Engagement Plan (SEP), which is mentioned in the ToR, as a document to be prepared and included in the ESIA. But a SEP should be one of the first documents to be prepared even during the scoping phase, following IFC PS1 standards.

- The NCEA recommends to:
  - supplement the scoping study with information on the first five bullets, according to the specific recommendations as provided by the NCEA in Chapter 3. Information on the bullets 6 and 7 can be analyzed in detail during the ESIA;
  - make an effort to develop tailor-made ToR, reflecting the main findings in the updated scoping documents, paying specific attention to a draft Stakeholder Engagement Plan.

### 3. Key findings and recommendations

Below the NCEA describes its key findings, following the sequence of topics as presented in both scoping studies. Each observation comes with a specific recommendation.

As the scoping studies/ToR for Nametil and Namapa resemble each other to a great extent, a large number of the NCEA's observations will be applicable to both scoping studies/ToRs. Whenever an observation or recommendation is only applicable for Nametil or Namapa, this will be indicated specifically.

#### 3.1 ESIA team (sections 2, 4.3.1 and 11.10)

It is mentioned that the project proponent will be responsible for negotiation for land and compensation due to loss of income. Although the composition of the proposed ESIA team includes socio-economic expertise, this does not seem to include specific expertise on the topic of land issues, compensation and resettlement.

- The NCEA recommends to provide an overview of the proponent's capabilities for conducting this activity in line with IFC PS5. This shall include an organogram and CV's of their E&S team, key staff required for implementing the land acquisition and compensation and clear definitions of roles and responsibilities between the ESIA and project proponent teams. Considering the potential extent of resettlement caused during project construction, the inclusion of a resettlement specialist in the ESIA team is required.

#### 3.2 Indirect area of influence (section 3)

The scoping document for Nametil states that "For convention, the administrative post of Nametil and covering the extension in which Meluli River flows was defined as indirect area of influence (Figure 3-3)". For Namapa the following is indicated: "For convention, the administrative post of Namapa and the length of 50km upstream and downstream Lurio River which is the top border of Namapa Administrative Post will be considered indirect area of influence (Figure 3-2)". These statements are unclear (for convention?; how many kms upstream and downstream and why this amount?)

- The NCEA recommends to more clearly indicate the indirect area of influence on a map, including a justification for the chosen boundaries.

#### 3.3 Land use and landownership (section 3.3.2 and section 4.4)

Regarding the location of the reservoirs, the Namapa scoping document states that "Location 2 and 3 are considered public domain, while location 1 is already cleared area." This is an ambiguous statement. Are locations 2 and 3 public land or not? Is location 1 in use or not and has it been cleared by the project proponent or by others? For both Namapa and Nametil it is stated that no infrastructures are present at the sites intended for reservoirs, but it remains unclear what this means for existing use or rights.

Section 4.4. later on states that when the land is occupied by crops, fencing or other structures, “compensation mechanisms must be created whose structures will be part of the Environmental Management Plan (EMP) of the construction to be elaborated with the EIA implementation document that will result from the classification that will be awarded to the project.” This sentence is very confusing and it is unclear what kind of compensation mechanisms will be established within the EMP.

- The NCEA recommends to improve the description of current land use and land rights to prevent issues around compensation at a later stage. Reformulate and be more specific about the compensation structures that are envisioned to be established. This description is critical to ensure that the proposed governance structure and compensation mechanism will be established in accordance to IFC PS5 requirements.

### 3.4 Project activities and intervention options (section 4)

No mention is made of abstraction quantities at the water source (4.2.1.1, 4.2.2.1, 4.2.3.1 and for Namapa also 4.2.4.1). This is essential information for further analysis.

The text about the phasing (Nametil 4.2.4 and Namapa 4.2.5.1) and the figure 4–19 (Nametil) are difficult to understand.

Section 4.2.5 Nametil and 4.2.6 Namapa does not show where in the town electricity poles and cables will be placed.

The description on investment cost and option choice (4.6) is very brief, but seems to imply that the option 1A is being chosen because it has the lowest investment cost. Lowest cost choice makes sense if all other variables are equal. It is unclear if that is the case.

Regarding the project description in general, some components are not, or insufficiently described, for instance construction camps are mentioned, but size and expected amount of workers are not indicated. Other examples are potential new and upgraded access roads for construction and the cost and transport aspects of chemicals for the purification plants.

- The NCEA recommends to, in line with IFC PS 3 and 4:
  - include information on water abstraction quantities
  - provide a better explanation of the phasing choices e.g. in phase 1 only standpipes, in phase 3 only house connections
  - include a map showing the electricity infrastructure
  - clarify the choice for the preferred option, not only based on costs but also taking into account environmental and social variables
  - complete the description of all related project activities, and quantify if possible.

#### **For Nametil specifically**

Abstraction works (4.1.1). Information about the dam/dike is lacking: length, height, when built, state of maintenance, operational and usable or not? In section 5 it is mentioned that during the dry season the river has no flow during longer periods. However, increasing the storage capacity<sup>3</sup> by raising the dike crest, or otherwise, appear not to have been considered. Why not? This decision has grave impacts (see section below).

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<sup>3</sup> See also feasibility study section 6.1 on p.38, last sentence: "This additional storage was not allowed for in the proposed scheme or costing, but can be added if required by the Client"

Ongoing project (4.1.6) “In 2019, a technical project was initiated for the improvement of the water supply system, with a view to improve the quality and quantity of water supplied in the village of Nametil. New water treatment infrastructure is currently under construction.”

It is unclear how this links to the project that is the subject of this scoping study.

Dam/dike height (4.2) The option to raise the level of the dam crest by 1m is mentioned but does not seem to be included in the project.

River flow and abstraction (4.2) The statement about the river flow of 0,7m<sup>3</sup>/s at 80% of assurance is not linked to the expected abstractions.

Water demand (4.2.4) “The new treatment works will need to be constructed in four modules of 1 500 m<sup>3</sup>/day, with a long-term design capacity of 8 400 m<sup>3</sup>/day” This statement in combination with the table 4-5 right below is difficult to understand.

In the same section 4.2.4. m<sup>3</sup>/day, l/s and kl/day are used in a confusing way.

- The NCEA recommends to:
  - include technical details about the dam/dike, including the option to raise the crest
  - explain if and how the 2019 project links to the current planned project
  - show that river flow is sufficient to meet expected abstractions
  - use consistent figures and units in the text and table regarding the treatment works.

### 3.5 Biophysical and socio-economic setting (section 5)

Although a biophysical and socio-economic description of the area is provided, this is too shallow. In particular the following topics are missing:

#### **Biophysical (river gauges, river flow, hydrology, climate) baseline**

Nametil, section 5.1.5.1.1: Without a map showing the locations of the two gauging stations it is difficult to understand the description of stream flows and the meaning of fig. 5-5

“The above streamflow availability analysis indicated that the Meluli River has zero surface flow for significant periods during most dry seasons. For many years, Nametil has been receiving water from a Barrage on the Meluli River, nearby the town. ....it is estimated that the Full Supply Capacity (FSC) of the Barrage could be about 370 000 m<sup>3</sup>.”

Namapa section 5.1.5 The description on hydrology is too shallow.

For both Nametil and Namapa, there is no reference to extreme events in the area like floods, droughts, cyclones.

- The NCEA recommends to:
  - include a map showing gauging stations for Nametil
  - indicate whether or not the storage capacity at the Meluli river for Nametil is expected to be sufficient, insufficient, or if this needs to be investigated (and included in the ToR)
  - provide more information about the flow regime of the Lurio river for Namapa.
  - include more information on climate related extreme events.

#### **Biotic baseline**

There is no information on ecology and/or biodiversity aspects. Ecosystem services feature in the ToR, whereas they are not mentioned in the scoping document. This is true in particular for riverine ecosystems, of which there is no mention at all. The water requirements of

riverine ecosystems, together with the water requirements of downstream populations, should be key aspects of analysis and mentioned in this scoping study.

- The NCEA recommends to provide more information on biotic baseline, paying specific attention to identification of possible biodiversity–issues, including riverine ecosystems, protected areas and endangered species, but also other (non–protected) sensitive areas and species that may suffer or benefit from the project (in line with IFC PS 6).

#### **Socio–economic baseline**

The current social economic baseline descriptions (sections 5.2) are insufficient and in disbalance as compared to the biophysical baseline.

- The NCEA recommends to include a more detailed description of the socioeconomic contexts, addressing at minimum the following content and including various pictures for the reader to be able to understand the local context (can be added to the ToR, section 11.4)
  - Administrative Political Organization of the municipality
  - National State Organization and representation at the Local Level
  - Community Organization (Community associations, NGOs, Churches, etc.)
  - Population
  - Socio–Demographic Indicators, including willingness and ability to pay
  - Wellness Indicators (Housing, Access to energy, Access to water, Sanitation)
  - Social Equipment and Infrastructure (Education, Healthcare, Communications, Road Network
  - Economic Activities (Agriculture and Livestock, Fishing, Industry and Services, Trade)
  - Land Use and Occupation Patterns
  - Vulnerable Groups and Traditional Livelihoods

#### **For Nametil specifically (5.2)**

It is stated that the neighborhoods of Melule C, Namacaro C Expansion, Melule B Expansion and Cava–Cava are not yet covered by the existing water system. However, two of these neighborhoods (Namacaro C Expansion, Melule B Expansion) are not included in the prioritization for new improvements.

The description should include downstream water users and their water requirements

- The NCEA recommends to explain the logic used for choosing prioritization and why these are not included in the priority list. Downstream water users should also be included.

### **3.6 Impacts (section 6 and 8)**

#### **Physical component (section 6.2.2.1 Nametil)**

The text indicates that the current storage is not sufficient for a secure supply to Nametil and that during the dry season periods of zero flow occur, while the current storage capacity is not sufficient to guarantee year round supply. However, raising of the dam/dike does not appear to be part of the project.

Two impacts are currently not considered in the scoping document:

- The impact of increased abstractions on downstream water users and
- The impact of no flow on the water users in Nametil.

These dry spells in combination with the insufficient storage capacity means that abstractions will also take place when river flows are very small or equal to the abstraction rate, causing drying up of the river and severe downstream effects to communities in the dry season that are increased in comparison with the situation without the project. The conclusion “With the foreseen abstraction, environmental and cultural/social functions and processes are not affected.” is therefore difficult to understand and would need further explanation, if it holds. Consequently the significance could be high. If indeed this is the case and the project is to go through, these negative downstream impacts on people (and possibly riverine ecosystems) would have to be considered for mitigating measures.

The absence of sufficient storage is expected to lead to longer periods of no water in the system. The positive impacts of the system may be strongly and seriously offset by this.

- The NCEA recommends to justify the conclusion that abstraction impacts will be low, and to adapt the scores. Minimum (environmental) flow requirements will need to be established in the ESIA for both human use and riverine ecosystems (according to IFC PS 3, 4 and 6).

#### **Biological/ecological component (6.3)**

As a baseline for this component is missing (see paragraph above), it is not possible to do a proper impact assessment. No mention is made for instance of river ecosystems and the way these are impacted by the projected abstractions.

- The NCEA recommends to include more information on potential impacts on biodiversity, ecosystems and living natural resources (in line with IFC 6)

#### **Socio-economic component (6.4)**

The listing of potential social impacts is incomplete, and several impacts are missing. Considering the high influx of people to the region, which can be caused by the project, an indication of likely impacts from project induced in-migration (besides the influx of migrant workers already mentioned) is important. This can result, for example, in local inflation and changes on existing social dynamics.

- The NCEA recommends to conduct a full consideration about the potential social impacts, in line with IFC PS1 to 5, Potential impacts shall include at least the following:
  - Project induced in-migration and associated effects
  - Impaired access to public services and properties during construction
  - Impacts to ecosystem services (e.g. fisheries) due to water abstraction (operations)
  - Disruption of road traffic (construction)
  - Noise, vibration and dust emissions (construction)
  - Public safety (due to influx of workers and in-migration)
  - Disposal of construction waste materials (pollution)
  - Lack of access to water during operations, in case (vulnerable) community members are unable to pay for piped water

- Impact of loss of crops, breaking it down for potentially affected stakeholders (shop owners, subsistence farmers, residences, etc.), especially on the long term.
- Induced impacts as a result of inadequate waste water management and sanitation
- Visual impacts of electricity poles

Also reflect new included impacts in Table 6–23 and include these in the ToR.

### 3.7 Alternatives and choice of option (sections 3.3.1, 6.6 and 9)

Alternatives are considered to some extent, although the various options are rather similar and do not differ greatly in terms of environmental and social impacts. However some other alternatives, for instance on options for alternative water abstraction points or phasing alternatives in the reticulation networks are not identified/assessed.

For Nametil, there is no justification for choosing the existing barrier as the most suitable location, in particular with the insufficient storage capacity at that point.

For both Nametil (recommended option 2) and Namapa (recommended option 1A), the analysis is too shallow to be able to draw conclusions of the preferred options. For example for Nametil it is stated that “Given the fact that Option 2 is cost-effective and is more centralized compared to Option 1, it is recommended for detailed design phase”. This is not sufficient in terms of explanation of the choice.

- The NCEA recommends to, in line with IFC PS1, provide the rationale for choosing the existing barrage as the most suitable location and properly justify why alternatives were not considered. This also applies to comparison of options for the reservoirs locations.

### 3.8 Terms of Reference (section 11)

The ToR are rather generic and not tailored to the findings of the scoping study. They also show inconsistencies with the scoping study: for example ecosystem services feature in the ToR, whereas they are not mentioned in the scoping document. Another example is the Stakeholder Engagement Plan (SEP), which is mentioned in the ToR, as a document to be prepared and included in the ESIA. But a SEP should be one of the first documents to be prepared even during the scoping phase, in line with IFC PS1 requirements.

Although institutional stakeholders are identified and initial consultations have taken place (at least according to the feasibility study for Nametil), stakeholders such as affected communities seem not to have been involved yet as part of the scoping study. Engaging stakeholders is not described as an integral part of scoping. In the ToR (11.9) two public meetings are planned to be conducted (public consultation and public hearing), which is not in line with IFC requirements stating that stakeholder engagement shall be early, meaningful and ongoing.

- The NCEA recommends to include in the ToR as part of the specialized studies (11.2 and 11.3.1) a Resettlement Action Plan/Livelihood Restoration Plan and Stakeholder Engagement Plan (SEP) in line with IFC PS1 and PS5 requirements, because of the long-term risk of economic (and potentially physical) resettlement. Considering the potential environmental, health and safety impacts, a HSE Management Plan may also be required. The draft SEP should list and indicate past and future engagement activities.

## 4. Detailed observations

### 4.1 Nametil

- Unclear what is shown in figure 3.7, no difference visible between the three maps
- Map's quality – some maps cannot be read (e.g., Figure 4–13, 4–15 and 4–17)
- Map 5.4: Colors don't seem to match the legend, making it hard to understand the extent of the Meluli basin
- Figure 5.9: include a more up-to-date overview of the regional land use map
- Figure 5–12 refers to Nametil District. Should be Mogovolas District
- Dates in top row of table 5.3 are not always clear (202025) and it would help to explain LMR and LMA in legend
- The description of the impact and impact significance evaluation doesn't match (e.g., 6.2.2.2 water pollution).
- Table 6–15: consequence for option 1, 2 and 3 should be positive and not negative.

### 4.2 Namapa

- Some maps are missing legends (in section 3 and section 4), therefore it is unclear what is shown e.g. fig. 3.2.
- Figure 3.1: use some color coding to indicate the direct area of influence of the project
- Figure 5.7: include a more up-to-date overview of the regional land use map.

### 4.3 For both Nametil and Namapa

- Consistency on the table of contents and descriptions for both documents: e.g. for Nametil, geohydrology is described under geology. In Namapa geohydrology follows the hydrology chapter.
- Non Technical Summary: The description of the options is correct but not very accessible to the reader. An overview table with elements that are different for the options displayed and an indicative map would be helpful
- Section 1 ESIA category: nothing is being said about the ESIA categorization. Even if not known at this stage, some information would be helpful, e.g. the categories and critical criteria, and information about when the categorization will take place.
- Section 5.1.3 Soils: The section on soils (and to a lesser extent the section on geology) doesn't make it clear what the situation is at the scale of the project, i.e. in Nametil and Namapa town respectively.
- Section 11. 1/11.3.1: In line with IFC PS1 requirements, change the name of the proposed environmental management plan to environmental and social management plan.

## Annex 1: IFC Performance Standards

IFC Performance Standards	Review findings for scoping / ToR for the ESIA
<b>PS 1 – Assessment and Management of Environmental and Social Risks and Impacts</b>	
<ul style="list-style-type: none"> <li>• Identify and evaluate environmental and social risks and impacts in the project’s area of influence. Avoid or minimise and compensate/offset for impacts.</li> <li>• Promote improved environmental and social performance (also of clients) through the effective use of management systems, incorporating SEA, a management programme, organisational capacity training, community engagement, monitoring and reporting.</li> <li>• Develop a Stakeholder Engagement Plan (SEP) and provide means for adequate engagement with Affected Communities and disseminate information throughout the project.</li> <li>• Establish a Grievance Mechanism to address grievances from Affected Communities and to respond to external communications from other stakeholders.</li> <li>• Take into consideration and adopt differentiated measures for those differently or disproportionately affected because of their vulnerable or disadvantaged status.</li> <li>• Formulate an Environmental and Social Management Plan (ESMP) with desired outcomes, targets, estimates of the resources and responsibilities.</li> </ul>	<p>The scoping document makes an initial impact assessment. A methodology is presented for impact assessment during the ESIA stage.</p> <p>no SEP (this should be developed at this stage)</p> <p>no Grievance mechanism established yet (normally not developed during scoping). However, ToR should mention this.</p>
<b>PS 2 – Labour and Working Conditions</b>	
<ul style="list-style-type: none"> <li>• Promote the fair treatment, non-discrimination and equal opportunity of workers, including a gender policy.</li> <li>• Establish, maintain, and improve the worker-management relationship.</li> <li>• Promote compliance with national employment and labour laws.</li> <li>• Protect workers, including vulnerable categories of workers such as children, migrant workers, workers engaged by third parties, and workers in the client’s supply chain.</li> <li>• Promote safe and healthy working conditions, and the health of workers.</li> <li>• Avoid the use of forced labour.</li> <li>• Establish an accessible Grievance Mechanism for workers to raise workplace concern.</li> </ul>	<ul style="list-style-type: none"> <li>• No reference in the scoping document regarding these topics</li> </ul>
<b>PS 3 – Resource efficiency &amp; pollution prevention</b>	
<ul style="list-style-type: none"> <li>• Avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities.</li> <li>• Promote more sustainable use of resources, including energy and water.</li> <li>• Reduce project related GHG emissions.</li> </ul>	<ul style="list-style-type: none"> <li>• Potential impacts have been identified covering these aspects</li> </ul>
<b>PS 4 – Community Health, Safety &amp; Security</b>	
<ul style="list-style-type: none"> <li>• Evaluate, prevent and mitigate adverse impacts and risks on the health and safety of the Affected Community during the project life from both routine and non-routine circumstances like:               <ul style="list-style-type: none"> <li>- Public access to the project</li> <li>- Exposure to hazardous materials</li> <li>- Impacts on priority ecosystems</li> <li>- Exposure to water related and communicable disease</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Briefly addressed under potential impacts</li> </ul>

IFC Performance Standards	Review findings for scoping / ToR for the ESIA
<ul style="list-style-type: none"> <li>• Ensure that preventive and control measures are consistent with relevant human rights principles and Good International Industry Practices.</li> <li>• Emergency Response must be coordinated and viable in terms of capacity of responsible agencies and communicated to Affected Communities.</li> <li>• Project Grievance Mechanism (PS1) will receive affected people's concerns about security arrangements and acts of personnel.</li> </ul>	
<b>PS 5 – Land Acquisition &amp; Involuntary Resettlement</b>	
<ul style="list-style-type: none"> <li>• Minimise forced evictions.</li> <li>• Avoid or minimise economic or physical displacement by exploring alternative project designs, including associated facilities.</li> <li>• Minimise adverse social and economic impacts from land acquisition or restrictions on land use by compensation, restoring and improving livelihoods, provision of adequate housing, security of tenure. Formulate a Resettlement Action Plan and Livelihood Restoration Plan when needed.</li> <li>• Establish Grievance Mechanism to receive and address concerns. Ensure that resettlement activities are implemented with appropriate disclosure of information, consultation and informed participation.</li> </ul>	<ul style="list-style-type: none"> <li>• Impact on the loss of crops and assets is identified and briefly assessed. It is expected that this is fully addressed during the impact assessment, and thus scoped in the ToR.</li> </ul>
<b>PS 6 – Biodiversity, Conservation and Sustainable Management of Living Resources</b>	
<ul style="list-style-type: none"> <li>• Protect and conserve biodiversity.</li> <li>• Maintain the benefits from ecosystem services.</li> <li>• Promote the sustainable management of living natural resources through the adoption of practices that integrate conservation needs and development priorities.</li> </ul>	<ul style="list-style-type: none"> <li>• No reference is made to ecosystem services in the scoping document. The ToR provide a brief methodology for assessment of ES.</li> </ul>
<b>PS 7 – Indigenous People</b>	
<ul style="list-style-type: none"> <li>• Avoid or minimise impacts on indigenous peoples.</li> <li>• Ensure sustainable and culturally appropriate development of benefits and opportunities.</li> <li>• Ensure Free, Prior and Informed Consent (FPIC) where populations described as indigenous people are affected by the project.</li> </ul>	<ul style="list-style-type: none"> <li>• Not applicable in Mozambique</li> </ul>
<b>PS 8 – Cultural Heritage</b>	
<ul style="list-style-type: none"> <li>• Protect cultural heritage from the adverse impacts of project activities and support its preservation.</li> <li>• Promote the equitable sharing of benefits from the use of cultural heritage.</li> </ul>	<ul style="list-style-type: none"> <li>• No reference to cultural heritage in scoping document</li> </ul>