

Non-Technical Summary (NTS)

Koloma Administrative City Project
Koloma, Conakry, Guinea

ACC UK Group Ltd

Project number: 60713383

June 2024

Quality information

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Revision	Revision date	Details	Authorized	Name	Position
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1. Introduction

Arabian Construction Company (ACC)¹ has been awarded a design and build contract for the development of the Administrative City Construction Project of Koloma, a new office campus in Conakry, Guinea (the Project), by the Société Nationale d'Aménagement et la Promotion Immobilière de Guinée (SONAPI). SONAPI is a vehicle of the Presidency of the Republic, under the financial supervision of the Ministry of Economy and Finance of Guinea, whose role it is to implement and monitor government policy on land development and the construction of social, economic and residential housing. The Ministry of Economy and Finance of Guinea are seeking international funding to finance payments for the development of the Project. The location of the proposed Administrative City Project is shown in Figure 2-1.

AECOM Limited (AECOM) has been appointed by ACC (the “Design & Build Contractor” or the Client) to undertake the work necessary to prepare an Environmental and Social Impact Assessment (ESIA) in accordance with the Applicable Lenders Standards, including the Equator Principles 4 (2020), Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (The “OECD Common Approaches”) 2016, the International Finance Corporation (IFC) Performance Standards (PS) on Environmental and Social Sustainability (2012) and the accompanying Environmental, Health, and Safety Guidelines (the ‘EHS Guidelines’) for the Project. This Non-Technical Summary (NTS) presents the key findings of the Environmental and Social Impact Assessment for the Project.

A national Environmental and Social Impact Assessment (EIES) Report was prepared in November 2022 by Administration et Contrôle des Grands Projets (ACGP) for the Project in line with the national legislation. An Environmental Conformity Certificate was obtained as reported by SONAPI during the meeting held on 13th September 2023 and later the conformity was put on hold by the authorities for this Project. Another consultancy company, Chemas Consulting Group LLC., was appointed by SONAPI for the development of 2 Environmental and Social Impact Assessments (2 ESIA), 2 Involuntary Resettlement Plans (2 IRPs), 1 Livelihood Restoration Plan (LRP) and a Socioeconomic Audit/Reference Situation (ASE/SR) as part of the Koloma Administrative City Project (PCCAK) in line with the national legislation for both for 9 ha of the area allocated for SONAPI (the same Project area which is subject of this ESIA study) and Koloma Directional Center (CDK) area which covers around 202 ha².

¹ The contract was awarded to ACC UK - ACC GUINEE Consortium, a wholly owned subsidiary of ACC Group Ltd and herein to be referred to as ACC.

² The surface areas mentioned in the Chemas Consultancy’s ESIA and associated studies (9 ha and 202 ha) might be slightly different from the areas considered within the scope of this ESIA study. Once the reports become publicly available and completed, the surface areas need to be revisited and confirmed.

2. Project Description

The Project site is located on unoccupied land in Ratoma in the north-east of Conakry. The proposed development site ('Site') which is to house the Administrative City Construction Project covers an area of approximately 7 hectares (total site area is 70,591 square metres of surface area) and is located on a larger area of historically cleared brownfield land owned by the Guinean state that totals approximately 202 ha (see Figure 2-1).

The Project includes the development of twelve 7 storey buildings, providing 72,000m² of office space to house Government Ministry departments. The location of the new Administrative City Construction Project is intended to relieve congestion on the Kaloum peninsula and to improve urban mobility by transferring the headquarters of Government Ministries to Ratoma. It is not definite at this stage which governmental buildings/authorities/departments will be moved to the proposed Project site, however from discussions with SONAPI, it seems the vast majority of ministries will be relocated except for defence related ministries.

The Project site is located near the premises of Radiodiffusion Télévision Guinéenne (RTG), the US Embassy, Orange Guinea Headquarters' and Saudi Arabian Embassy's construction sites and the Ministry of Foreign Affairs. There are also Chinese construction company, China Geo-Engineering Corporation (CEGEP), Kaporo Rail police station, sanitary materials depot, car/truck repair and garage, ACC's welfare facilities and site offices, SEG water tank/pumping station and Kaporo Rail cemetery in the vicinity of the Project site (to the west of the Project site). There is also Kipe Power Station (Central Electrique de Kipe) to the northwest of the Project site (approximately 500 m).

Whilst the site is currently unoccupied, as confirmed on the site visit, the site was historically occupied and subject to two evictions which occurred in 1998 and 2019. These evictions were carried out by the Ministry of Habitat and Construction and have been the subject of criticism by local communities and NGOs such as Human Rights Watch. SONAPI explained to AECOM that some compensation was awarded for evictions in 1998, however this is yet to be verified by the community. SONAPI has however confirmed that no compensation has yet been paid to displaced families who were evicted in 2019. SONAPI, with support from its consultant Chemas Consulting Ltd, has now recently begun engaging with evicted families and their representative group, "Collectif des déguerpis" (The Collective of the Evicted) with the intention of retrospectively paying compensation in the form of cash and replacement land and providing livelihood support.

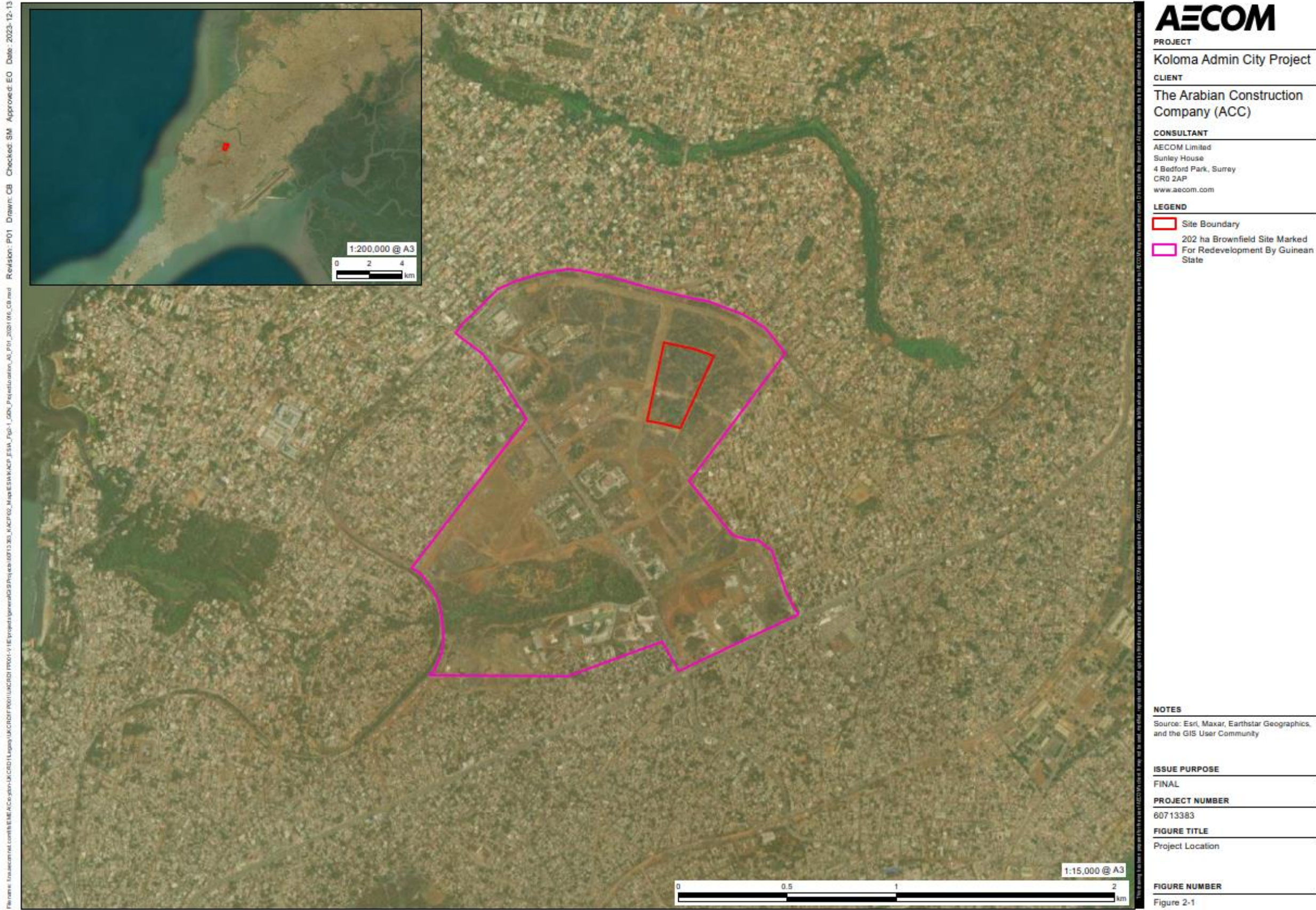


Figure 2-1: Project Location

2.1 Project Team

2.1.1 Project Proponent

SONAPI is the “*Loan Beneficiary*”) under the financial supervision of the Ministry of Economy and Finance of Guinea (the “*Borrower*”). SONAPI’s role is to implement and monitor government policy on land development and the construction of social, economic and residential housing. SONAPI appointed Arabian Construction Company (ACC the “*Design & Build Contractor*”) with a design and build contract for the development of the Project.

ACC’s scope of works includes:

- Facilitate arrangement of Export Finance and fulfil related UKEF procurement compliance only;
- Design and engineering;
- Construction works including all building services and fixed finishes; and
- Testing and Commissioning prior to handover.

2.1.2 The Project Lenders

The Project Lenders are UK Export Finance (UKEF - the operating name of the Export Credits Guarantee Department which is the United Kingdom’s export credit agency and a ministerial department of His Majesty’s Government) and Deutsche Bank AG.

2.1.3 Environmental and Social Consultants

ACC has commissioned AECOM to lead the Project ESIA Study, associated consultation and reporting to align with the Applicable Lenders’ Standards. AECOM works with client teams in designing, planning and implementing ESIA’s which meet national and international standards and undertake all aspects of ESIA including: baseline data gathering, preparation of Stakeholder Engagement Plans (SEPs), engagement with affected communities and stakeholders; assessment of social and environmental impacts, defining mitigation and management plans; consultation, disclosure and advice on regulatory ESIA requirements and interaction with project funders.

AECOM has partnered with Société d’Expertises Environnementales et Sociales (SEES) in Guinea who provide support in undertaking field surveys and stakeholder engagement activities in order to assess and produce the documentation required for the ESIA. SEES is a consultancy based in Conakry with over 20 years experience in environmental and social studies and have supported both national and international clients.

2.2 Project Components and Design

The proposed Project which is envisaged to house the various government ministries in one location covers approximately 7.1 hectares that will be developed to include (built up areas):

- 12 x office buildings, 7 storey (830m² X 12 Buildings = 9,960m² of surface building footprint area)
- 2x Buildings that will house (carpark footprint area 3,655m² x 2 = 7,310m²):
- Parking
- Utilities
- Restaurants
- An Auditorium (of surface footprint area 1,242m²), Heritage Pavilion (of surface footprint area 671m²) and Amphitheatre (of surface footprint area 886m²).
- External works including landscaping, covered parking, roadways and associated infrastructure.

The visual and layout for Administrative City Project is shown in the Figure 2-2 and Figure 2-3 below. The detailed design was ongoing at the time of writing the ESIA report. Main construction permit for the Project will commence with the Detail Design Sign-off. The intended lifespan of the development is 60 years and can go further depending on the preservation techniques employed by the Owner and the way the building is utilized.



Figure 2-2: Project Visual (Source: ACC)



Figure 2-3: Project Components (Source: ACC)

2.3 Associated Facilities

The OECD Common Approaches defines associated facilities as:

“those facilities that are not a component of the project but that would not be constructed or expanded if the project did not exist and on whose existence the viability of the project depends; such facilities may be funded, owned, managed, constructed and operated by the buyer and/or project sponsor or separately from the project”. (OECD, 2016)

IFC Performance Standard 1 defines associated facilities as:

“facilities that are not funded as part of the project and that would not have been constructed or expanded if the project did not exist and without which the project would not be viable”. (IFC, 2012)

There is a Development Plan (1/3000 scale) which shows planned road network with associated utilities that are under the jurisdiction of the relevant Guinean public authority and to be constructed regardless of this Project. Currently, there are no associated facilities for this project.

2.4 Project Justification

Guinea is currently aiming to transition back to civilian rule in late 2025. The project is regarded as essential for the transition back to civilian rule in the country and will provide state of the art modern office facilities that will improve government efficiency, transparency and employment for women. Considering its importance, it is currently listed as the most important project on the priority list of projects in Guinea. The Guinea government currently spends more than Euro 17.5M annually in rental for the various ministries of which all goes to private sector landlords for substandard properties not suitable in purpose or transparency. It is estimated that the project will ultimately provide functional office space for over 8,000 Guinea employees with dedicated vocational training.

The project will help to modernize and promote professionalism and transparency for the Guinea Government in allowing it to house all of its various ministries, currently fragmented across the city in buildings no longer large or modern enough to satisfy their needs, in to one strategic, modern office park that will be up to key standards in terms of modern infrastructure and telecommunication requirements.

With the development of this Project, the Project will contribute to the following benefits/positive impacts of which have been discussed in the relevant sections of the ESIA report:

Construction Phase

- **Local employment:** Local employment will bring about positive impacts on the local economy and will improve the livelihoods of the workforce and their families. ACC will take steps to maximise local employment and where necessary provide training to the workforce.
- **Opportunities for local businesses:** There will be need for local service providers to support the construction process, this might include waste disposal contractors, catering, provision of building materials etc.

Operational Phase

- **Improved government facilities:** The main objective of the project is to provide a number of government ministries with improved modern offices and facilities which are all located in one place which will improve the working conditions of all government staff currently employed across Conakry. The new premises will be designed to promote more open participation of females the workplace with the inclusion of separate female toilets and will be able to cater for handicapped employees due to access and egress and dedicated washrooms.
- **Increased employment:** Although much of the government workforce who will be located at the Project will be relocated from the existing government offices, the new facilities will create a number of additional jobs, particularly facilities management and maintenance.
- **Opportunities for local businesses:** The arrival of government ministries at the Project will attract many local businesses seeking opportunities. This will include licenced service providers at the project and also informal vendors which will likely move to the area.
- The Project has other potential positive outcomes, but the magnitude and consequence are difficult to quantify at this stage or fall outside the scope of this ESIA study (noting that the Administrative City as part of a much larger masterplan for the development of the Koloma area). These benefits includes:

- **Promote Conakry Internationally:** The project will likely allow Conakry to continue to expand its presence as the key economic and business hub for Guinea and a growing player on West Africa port cities.
- **Improved inter-ministerial co-operation:** Locating government ministries within the same locality will likely improve the ability of said ministries to communicate and work together which will likely improve overall governance in Guinea.
- **Reduced traffic to downtown Conakry:** Conakry currently experiences significant traffic congestion as many people make the daily commute southwest from residential areas in the morning to access government offices in downtown Conakry. A secondary objective of the project is to reduce this congestion. The location of the Project will likely reduce the need for this commute as many government staff will no longer be required to travel as far south along the peninsula.
- **Contribute to the overall development of Conakry:** The project is part of an overall government objective to build and modernize local infrastructure to improve connectivity between the local airport and the seaport as the future business hub or business district of Conakry thus promoting economic growth and contributing to development needs.
- **Promote the efficiency and coverage of government service delivery across a wider spectrum of society.**
- **The savings made on rental charges will free up monetary resources to be allocated to other government expenditure.**
- **Long term benefits to local communities as a result of the resettlement action plans to be implemented, ensuring affected groups (i.e. those impacted by historical evictions) are able to access community engagement projects**
- **Promote the ease of opening up businesses and carrying out activities for locals and foreign companies alike.**
- **Promote greater transparency and efficiency between government departments.**
- **Promote modern, safe workspaces for employees that will be housed in the development which will ultimately reflect in increased professional development and efficiency.**
- **Promote more open participation of females the workplace with the inclusion of separate female toilets.**
- **Will be able to cater for handicapped employees due to access and egress and dedicated washrooms.**
- **Meet priority human development needs.**

2.5 Construction Activities

The site preparation activities started in September 2023. The Construction is planned to be undertaken in two phases (Phase 1 include the main works related with Building 7, 8, 11, 12 and Parking Building 2; Phase 2 include Building 1,2, 3, 4, 5, 6, 9, 10, Parking Building 1, Auditorium, Heritage Pavilion, Outdoor Theatre, warehouse, Guard House, road works). The construction (for both Phase and Phase 2 including test and commissioning) is expected to last approximately 27 months and planned to be finalized until the end of January 2026. The construction of the Project will be carried out by ACC and that the main site preparation and construction activities will be the following (but not limited to):

- Design and Conception Stage;
 - Mobilization and Site Preparation (including excavation);
 - Structural Works;
 - Glazing, MEP (Mechanical, Electrical, Plumbing);
 - Finishes and External Works; and
 - Testing and Commissioning.
- ACC will directly deliver 50% of the Project which will be Structural works and the MEP services. It is planned that specialist subcontractors and suppliers will be sought for the balance of works.

It is expected that the construction workforce will be 2500 persons at peak. There will be also 95 supervisory and office staff (from ACC) at the peak. During the early stages of the construction works, the number of workers will be low (under 100) but will rise when the civil work begins.

As the construction workforce are Guinean nationals residing in Conakry, they will be residing in their own homes. The workforce will comprise a mix of skilled & general labor level for all construction trades (concrete, steel, masonry, etc.). The workforce will be sourced locally, especially for the construction operatives. ACC will be hiring its workforce from organised labour agencies who shall be responsible for compliance with National Laws and insurance provisions. Temporary welfare facility have been developed adjacent to the north of the Project site. The temporary welfare facility will include prefabricated offices, built storage areas, toilets, rest and catering areas and a clinic. The prefabricated offices is planned to have two blocks.

2.6 Project Operation

SONAPI was created in 2008 and attached to the Presidency of the Republic in July 2018. On 24 October 2022, a decree amended SONAPI's articles of association, making it a Société Anonyme (S.A.). SONAPI has built social housing including but not limited to in Conakry (Kéitaya), Kankan, Siguiiri, Mandiana, Sinko, Labé, Faranah, Kérouané, Boké, Kindia. The main responsibilities of SONAPI are;

- Managing and carrying out, on behalf of the State, local authorities, republican institutions and public companies, urban land development operations made available to it by the Ministry of Housing and Town and Country Planning, and building basic infrastructure, social facilities and any other related activities.
- Partnering with foreign companies or private national companies in the design, financing, implementation and management of urban development programmes, projects and operations.
- Generally, to carry out any real estate transaction directly or indirectly related to one of the objects set out above or any similar or related object.

A management company will be established under SONAPI for the operation phase of the Project namely, SOJECAC, who will be responsible for the management of the defined operational services. Currently, the operational services to be served by the SOJECAC have not yet been agreed and defined. Therefore, the necessary information and assessment related to the operational services (likely to include cleaning, landscaping and waste removal) cannot be fully made in this ESIA study.

An operational environmental and social management plan (OESMP) will be developed and implemented for the Project; the relevant sub-plans within the OESMP will be prepared prior to operational phase of the Project by SONAPI. Prior to the completion of the construction phase and handover, ACC will provide guidance and support to SONAPI on the preparation of the relative OESMPs to ensure the compliance with the operational commitments contained in the ESIA.

It is expected that the project will ultimately provide functional office space for over 8,000 Guinea employees with dedicated vocational training. The number of operational staff/employees as well as the administrative authorities' buildings, which will be relocated to the proposed project site, are not definite at the time of writing the ESIA report, however the vast majority of ministries will be relocated except defence related ministries. As reported by the representative of SONAPI the employees that will work at the office complex currently work in existing government administrations on various locations across the city. There will be no need to employ additional operational staff for the Project; the existing staff/employees will be relocated to the proposed Project site. However, as mentioned above, operation of the new facilities with the services particularly facilities management and maintenance may create a number of additional jobs.

3. Legislation and Institutional Framework

This section presents the summary of the key overarching legislation, standards and guidelines applicable to the Project. The Lender's Applicable Standards include the host country laws and the provisions of the OECD Common Approaches, the IFC Performance Standards and Equator Principle 4.

3.1 National Legal Framework

3.1.1 National Transition Charter

Following the coup d'état of 5 September 2021 and a national consultation from 14 to 23 September 2021, the Transition Charter was signed on 27 September 2021 by the President of the Transition, Head of State and Supreme Commander of the Armed Forces, Colonel Mamadi Doumbouya. Articles 8 and 9 guarantee the fundamental rights and freedoms of citizens, who are equal in rights and duties. Article 10 recognises the right to respect for physical and moral integrity, and Article 17 recognises the inviolability of the home.

3.1.2 Environmental and Social Legislations

Environmental Code

Environmental legislation is governed by the Environmental Code (Decree No. D/2019/221/PRG/SGG promulgating Law No. L/2019/0034/AN of 04 July 2019 on the Environmental Code in Guinea) which sets out the legal framework for the preservation, management, use and restoration of natural resources.

Article 11 states: *"The Ministry in charge of the environment shall receive, for its opinion, all draft texts directly or indirectly affecting the environment, all programmes, policies, strategies, plans and projects, and all authorisations involving an impact on natural resources and the environment."*

Article 25 requires any player whose activities may have a potential impact on the environment to carry out an environmental assessment. Articles 27 to 34 describe the purpose, procedure, content and validation of the environmental assessment. The first article (No. 69) of the Code states that *"Sites of historical, archaeological, scientific and cultural importance, as well as plant and animal species of ecological, aesthetic or medical interest, are protected by this Code"*.

Order on Administrative procedure for Environmental Assessment (amending order A/2022/1646/MEDD/CAB/SGG of 25 July 2022)

Article 15 states that all development projects, works or operations likely to harm the environment and classified in one of categories A, B, C or D are subject to a prior Environmental and Social Impact Assessment (ESIA). In accordance with the procedure set out in Order 1595, the various stages in carrying out the ESIA are as follows:

- Submission of the project notice;
- Preliminary sorting;
- Drawing up the scope (scoping) and terms of reference;
- Carrying out the study;
- Examination/analysis of the report;
- Decision-making;
- Implementation; and
- Environmental monitoring and control.

Order specifying the content of the reports required for Strategic Environmental Assessments, Environmental and Social Impact Assessments, Environmental and Social Impact Notices, Relocation Action Plans and Simplified Relocation Action Plans.

A Local Environmental and Social Impact Assessment (EIES) Report was prepared in November 2022 by Administration et Controle des Grands Projets (ACGP) for the Project in line with the national legislation. An Environmental Conformity Certificate was obtained as reported by SONAPI during the meeting held on 13th September 2023 and later the conformity was put on hold by the authorities for this Project. As informed by SONAPI, Environmental Conformity Certificate will be approved soon.

Another consultancy company, Chemas Consulting Group LLC., was appointed by SONAPI for the development of 2 Environmental and Social Impact Assessments (2 ESIA), 2 Involuntary Resettlement Plans (2 IRPs), 1 Livelihood Restoration Plan (LRP) and a Socioeconomic Audit/Reference Situation (ASE/SR) as part of the Koloma Administrative City Project (PCCAK) in line with the national legislation for both for 9 ha of the area allocated for SONAPI (The same Project area which is subject of this ESIA study) and Koloma Directional Center (CDK) area which covers around 202 ha³.

3.2 International Requirements: Standards, Agreements and Guidelines

3.2.1 OECD Common Approaches

OECD Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (Common Approaches) 2016, set out common approaches for undertaking environmental and social due diligence to identify, consider and address the potential environmental and social impacts and risks relating to applications for officially supported export credits as an integral part of Members' decision-making and risk management systems. The Common Approaches requires that Members should, amongst other actions:

- Encourage the prevention and the mitigation of adverse environmental and social impacts of projects and the consideration of environmental and social risks associated with existing operations and take into account the benefits of any projects and existing operations supported, thereby enhancing the overall financial risk assessment process.
- Undertake appropriate environmental and social reviews and assessments for projects and existing operations respectively, as part of their due diligence relating to applications for officially supported export credits.
- Encourage protection and respect for human rights, particularly in situations where the potential impacts from projects or existing operations pose risks to human rights.
- Foster transparency, predictability and responsibility in decision-making, by encouraging disclosure of relevant environmental and social impact information, with due regard to any legal stipulations, business confidentiality and other competitive concerns.
- Continue to encourage the application of the international standards referenced in this Recommendation or their equivalent by non-Members, to promote the adherence to this Recommendation by non-Members including through an active dialogue to increase awareness and understanding of the benefits of its application, and to take other appropriate measures with the aim of promoting a global level playing field for officially supported export credits.
- The ESIA should be benchmarked against the relevant aspects of the IFC Performance Standard, EHS Guidelines, as described below.

3.2.2 IFC Standards

The Performance Standards (PSs) provide guidance on how to identify risks and impacts, and are designed to help avoid, mitigate, and manage risks and impacts as a way of doing business in a sustainable way, including stakeholder engagement and disclosure obligations of the client in relation to project-level activities.

The IFC PSs that are considered to be relevant to the Project are presented in Table 3-1.

³ It is noteworthy to mention that the surface areas mentioned in the Chemas Consultancy's ESIA and associated studies (9 ha and 202 ha) might be slightly different from the areas considered within the scope of this ESIA study. Once the reports become publicly available and completed, the surface areas need to be revisited and confirmed.

Table 3-1: Applicable IFC PSs

IFC PS	Applicability	Notes
PS 1: Assessment and Management of Environmental and Social Risks and Impacts	Yes	Establishes requirements for social and environmental performance management throughout the life of a project.
PS 2: Labour and Working Conditions	Yes	Highlights the need for workers' rights regarding income generation, employment creation, relationship management, commitment to staff, retention and staff benefits.
PS 3: Resource Efficiency and Pollution Prevention	Yes	Defines an approach to pollution prevention and abatement in line with current internationally disseminated technologies and good practice.
PS 4: Community Health, Safety and Security	Yes	Specific requirements for mitigating any potential for community exposure to risks and impacts arising from equipment accidents, structural failures and releases of hazardous materials.
PS 5: Land Acquisition and Involuntary Resettlement	Yes	Involuntary resettlement and economic displacement has occurred as a result of the Project.
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	Yes	Sets out an approach to protect and conserve biodiversity, including habitats, species and communities, ecosystem diversity, and genes and genomes, all of which have potential social, economic, cultural and scientific importance.
PS 7: Indigenous Peoples	No	Recognises that Indigenous Peoples (IPs) can be marginalised and vulnerable (e.g., if their lands and resources are encroached upon by or significantly degraded by a project). There are no IPs in the study area which is located within an urban area and therefore no IPs have traditional or customary rights to the land or natural resources.
PS 8: Cultural Heritage	Yes	Aims to protect irreplaceable cultural heritage, to provide guidance for protecting cultural heritage throughout a project's life cycle and to promote the equitable sharing of benefits from the use of cultural heritage in business activities.

IFC General EHS Guidelines, 2007

The IFC General EHS Guidelines are technical reference documents. They contain examples of Good International Industry Practice (GIIP) in all industry sectors. The purpose is to use the Guidelines together with relevant GIIP during the appraisal of a project, to minimise, avoid and control environmental, health and safety impacts during construction, operation and decommissioning of a project. The Guidelines contain performance levels for which to assess the project against. Performance levels are those considered acceptable by the World Bank Group (i.e., levels considered achievable in new facilities at reasonable costs using existing technology).

3.2.3 Equator Principle 4

The Equator Principles (EPs) is a risk management framework used by financial institutions to assess and manage environmental and social risk in projects aiming to support responsible risk decision-making. The EPs apply to all new project financings with total capital costs of USD10 million or more across all industry sectors globally. The EPs represent a framework for project financing, which is underpinned by the IFC Performance Standards (PS).

The extent to which the EPs apply to a project depends on whether the country in which the project is located is "Designated" or "Non-Designated". Projects within Non-Designated countries such as Guinea are required to follow the standards and guidelines as set out in the IFC PSs and Environmental Health and Safety Guidelines. In addition to the IFC standards note that the EPs also have specific requirements for climate change risk assessment and human rights risk assessments.

4. Stakeholder Engagement

Stakeholder engagement activities for the Project have been undertaken as part of the ESIA Report preparation. Engagement undertaken to date included key informant interviews and small group meetings. Relevant stakeholders were identified including governmental authorities and non-governmental organizations (NGOs), neighbouring land users (particularly related to impacts from the Project activities) and the general public. The list of identified stakeholders are presented in *Section 5: Stakeholder Engagement* in the ESIA report.

The high priority stakeholders whom the project must collaborate include:

- SONAPI, the Project Developer
- The workers from ACC, the Project Contractor
- Construction workers and their representatives
- The Ministry of Economy, Finances and Planning
- The Collective of Evicted

A Stakeholder Engagement Plan (SEP) has been prepared for the Project which sets out the process for undertaking engagement and consultation with stakeholders.

The stakeholder engagement programme comprises several stakeholder engagement activities which aim to:

- Build and maintain stakeholder relationships.
- Gather information on the local environmental and social issues.
- Continue to disclose Project information (including any access restrictions, employment and procurement opportunities, and community health and safety issues).
- Monitor and evaluate stakeholder engagement.
- Provide stakeholders the opportunity to provide feedback.
- Manage grievances.

The discussions made/information obtained during the face-to-face meetings are presented in relevant chapters of the ESIA report. Further details of the stakeholder engagement activities and the process for undertaking engagement and consultation with stakeholders are provided in the Project SEP which is a separate document.

4.1 Future Engagement

The ESIA, Stakeholder Engagement Plan and this NTS will be publicly disclosed on the website of ACC (The project contractor) for a minimum of 30 days. All documents will be provided in English and the NTS will also be available in French.

During the construction phase of the project, ACC, the project developer, will be responsible for conducting regular engagement with local community leaders, local authorities, local hiring agencies and workers regarding employment and business opportunities, construction timelines as well as communicating health and safety matters and the grievance mechanism. Engagement will occur via one-to-one meetings, phone calls, leaflet distribution and media announcements. A schedule of engagement is presented in Table 6-3 of the SEP.

SONAPI, the project developer will be responsible for all engagement with The Collective of the Evicted regarding the ongoing compensation process. SONAPI will also be responsible for all community engagement and engagement with authorities during the operational phase of the project.

4.2 Grievance Process

A key requirement of the IFC PS1 is the establishment and communication of an effective and adequate Grievance Mechanism. Effective implementation of a Grievance Mechanism is crucial to the management of grievances from the local community and other stakeholders.

ACC will only be responsible for the management of grievances related with the services it provides during the construction phase and also grievances of workers that are working at these services. Grievances related with the compensation process or historic grievances related to the evictions will be under the responsibility of SONAPI.

The objective of the grievance mechanism as follows:

- Increase the likelihood that small disputes can be brought to a conclusion relatively quickly before they become deep-seated grievances.
- Keep ownership of the dispute in the hands of local people.
- Offer an early, efficient, and less costly way to address concerns.
- Open channels for effective communication
- Mitigate or prevent adverse impacts on communities caused by company operations.
- Improve trust and respect & promote productive relationships

AECOM, on behalf of ACC in the SEP document, has developed a grievance mechanism for the Project in accordance with IFC's Performance Standards and Guidance Notes which present various principles and good practice measures on grievance mechanisms.

Any person or organisation may send comments and/or complaints in person or via post, email, or facsimile using the contact information provided in Table 4-1.

Table 4-1: Responsible Persons and Contact Details

Construction Phase
Community Grievance Management Consultant (SEES) Phone: 613 163 171 Email: plainte.cite.adm.koloma@gmail.com

The grievance mechanisms will be publicized through posters (located at the project site, residential areas within 1km of the site), future consultation meetings with the community, letters (and online letters) to local and provincial authorities.

All information about grievance procedures, grievance forms, and responses will be available in French and a local language. Access to the mechanism will be free of cost. All written and/or verbal complaint will be recorded by the Project.

5. Environmental and Social Impact Assessment Methodology

An assessment of impacts was carried out as part of the ESIA. A number of criteria were used to determine whether or not a potential impact of the Project could be considered 'significant'. Wherever possible, a quantitative assessment of the impacts was undertaken. Where this was not possible, a qualitative assessment of impacts was made by technical specialist, based on existing information available for the site and the surrounding study area, and their experience with the development.

The stages in the assessment can be summarised as follows:

- **Baseline study:** The collection of relevant information on the current status of the environment. This study provides a baseline against which change due to the development is measured.
- **Impact Prediction and Assessment:** Impact prediction involves forecasting the likely changes in the environment that will occur as a result of the development. Impact Assessment requires interpretation of the importance or significance of the impacts to provide a conclusion or recommendation to the decision-makers who will impose conditions that must be satisfied before the development can be built.

- **Assessment of cumulative impacts:** This assessment will identify those combined impacts which may arise from other existing or planned developments in the area.
- **Mitigation:** Mitigation involves taking measures to reduce or remove the impacts.
- **Assessment of residual impacts.** This will be the impacts remaining following the application of mitigation measures.
- **Monitoring:** Follow up monitoring has been described in ESIA Report and includes the monitoring of impacts once the mitigations have been put in place.

6. Environmental and Social Impacts

6.1 Overview

The ESIA has assessed the potential impacts from the construction and operation of the proposed Project on the following environmental and socio-economic topics:

- Air quality
- Greenhouse gas assessment and climate change
- Biodiversity
- Noise and vibration
- Surface water, groundwater, and soil
- Waste management
- Traffic and transport
- Socio economic, community health and safety as well as labour and working conditions
- Archaeology and cultural heritage
- Cumulative impact assessment

Primary and secondary data have been collected for the Project Area of Influence to characterise the baseline conditions and identify sensitive receptors. Baseline field surveys included stakeholder interviews, ecological walkover survey, traffic and air, noise and water sampling. Climate Change Risk Assessment and Human Rights Screening have also been carried out and presented in the Appendices of the ESIA report.

The significance of potential Project impacts has been assessed taking into account embedded mitigation (including good international industry practices) that will be implemented by the Project. Where necessary, the ESIA also proposed additional mitigation measures to reduce the potential impacts to as low as reasonably practicable which are described in each respective section of the ESIA report.

6.2 Key Impacts

Overall, the ESIA found that with implementation of the full suite of mitigation measures, the construction and operation of the Project will result in insignificant or low significance impacts except hazardous waste management, traffic and transport, climate change and specific social issues which are further discussed below. The summary of residual impacts for each environmental and social aspects covered within this ESIA study are presented further in Table 6-1 below.

6.2.1 Air Quality

An assessment of likely air quality impacts associated with construction and operational phase Project activities has been undertaken. The assessment considers local air quality impacts at nearby existing sensitive receptors. The assessment of road traffic emissions relating to the Project has been undertaken using dispersion modelling to determine the predicted change in concentrations at sensitive receptors located adjacent to roads included in the traffic and transport assessment. The assessment of emissions from the operation of the construction and emergency generators have been considered qualitatively, based on the proposed number and size of generators required, the expected frequency of use and the location of sensitive receptors relative to the proposed generator locations.

A diffusion tube survey to determine concentrations of nitrogen dioxide was undertaken at roadside locations in the vicinity of the proposed development. The survey was started on the 11th October 2023, and was completed on the 2nd January 2024. In addition to the diffusion tube monitoring, a particulate matter monitoring survey was undertaken at a location within the site boundary. Monitoring was undertaken on the 12th October for a period of 24 hours. The diffusion tube and PM locations are shown in in Figure 6-1.

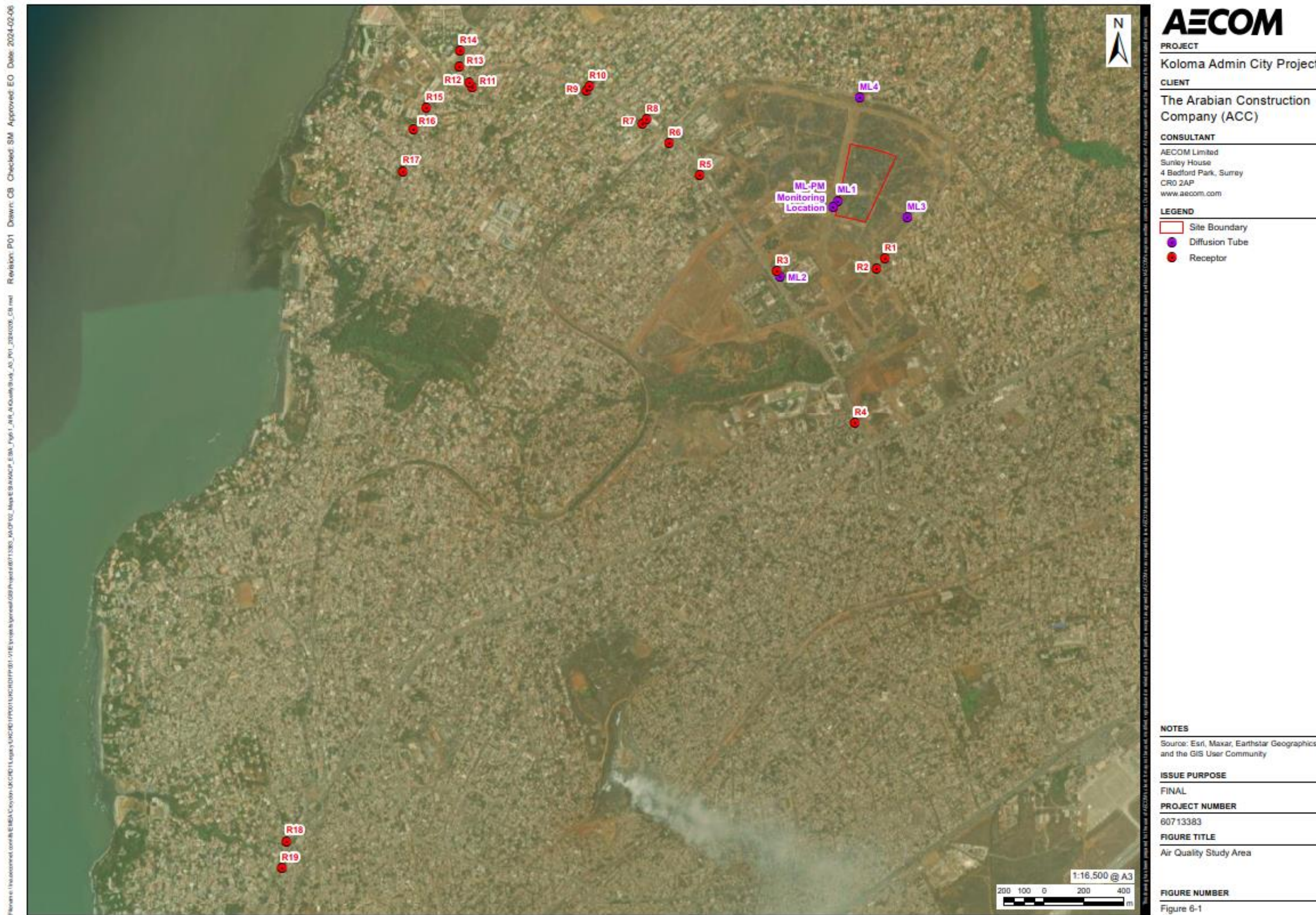


Figure 6-1: Diffusion tube locations (Receptors identified within the scope of the ESIA study are indicated with “R” in red and further detailed in the ESIA report)

The Project impacts during construction include:

- Fugitive emissions of dust from construction activities – dust soiling, impacts on health and ecological receptors
- Change in ambient concentrations of air pollutants (PM₁₀, PM_{2.5}, SO₂, CO, NO₂) in vicinity of construction site from construction plant and road traffic.

The Project site is situated within a broadly heavily urbanised area where there are several highly sensitive receptors (including existing barrack accommodation buildings and offsite residential properties and religious buildings) located close by. There are no ecological sites within 50m of the site boundary or the site access roads up to 500m from the site entrance. Project related activities such as site clearance, earthworks, general construction processes and materials handling (plus vehicle trackout) have the potential to temporarily increase dust emissions and PM₁₀ concentrations at nearby sensitive receptor locations. With the implementation of the measures embedded in the Project (as set out detail in the ESIA report), dust emissions should be suitably controlled and reduced such that any magnitude of impact would be negligible or low, which would result in an impact of **low significance**.

During the construction phase, there will be a number of construction plant operating on the site. While emissions from on-site construction plant and vehicles may have the potential to aggravate existing respiratory ailments in sensitive individuals, significant impacts to human health are considered to be unlikely based on transient nature of construction, distance to sensitive receptors, commitment to following general good practice with respect to the operation of combustion equipment. There will also be nine generators on site for the provision of electricity, with up to seven operational at any given time. Due to the size of each generator and the distance from sensitive receptors, it is considered that impacts from the generators would be negligible at any offsite receptor, and this is considered to be of **low significance**.

The Project impacts during operation include:

- Change in ambient concentrations of air pollutants (PM₁₀, PM_{2.5}, SO₂, CO, NO₂) in vicinity of site from emergency generators

Impacts during operation due to change in ambient concentrations of air pollutants (PM₁₀, PM_{2.5}, SO₂, CO, NO₂) in vicinity of site from emergency generators. It is proposed that there will be five generators for the purpose of emergency power in the event that grid electricity is unavailable, each with a capacity of 2500KVA. It is expected that these generators will only be in operation for emergency situations. It is considered that the magnitude of the impacts from the emergency generators would be negligible at any offsite receptor, and this is considered to be of **negligible significance**.

Provided that the embedded mitigation measures set out in detail in the relevant section of the ESIA report section are effectively implemented, the proposals are not anticipated to result in any significant impacts from an air quality perspective.

6.2.2 GHG and Climate Change

A greenhouse gas assessment was undertaken within the scope of the ESIA Study and has provided a benchmarked quantitative assessment of the emissions associated with the construction and operational use of the Project. When compared against the required emissions levels in order to be on track to meet the 1.5°C Paris Agreement global temperature rise limit, the emissions that the Project contributes towards the global targets are not significant and so the impact will be low adverse.

Considering the climate change projections for the region as well as the construction and operational context of the Project, a number of 'Significant' climate change risks were identified (wildfires, flooding, water scarcity, storm events), that even with these embedded controls and additional adaptation measures being implemented, the identified risks still pose a threat to the Project. As such it is vital the adaptation defined in the ESIA report are implemented from the onset of the construction and operational phases of the Project. During the operational and construction phases of the Project a 'Weather Monitoring' procedure will be developed and implemented for during both construction and operation of the Project. This 'Weather Monitoring' procedure will act as an early warning system that'll allow for adaptation measures and contingency plans to be initiated, in advance of the expected adverse weather conditions. Monitoring weather forecasts is one of the best procedures which address all the climate risks identified during the CCRA. By having advance warning on expected adverse weather

conditions and extreme weather events, the appropriate actions can be planned and taken prior to the weather impacting the Project. Further detail on the adaptation measures (such as storage of flammable materials, loose materials, monitoring of vegetation, provision of PPE etc.) for the construction and operation phase are detailed in the ESIA report. Implementing these measures will help reduce the risk of avoidable damage to equipment and assets, as well as preventable harm to personnel's health and safety.

6.2.3 Biodiversity

A site walkover and rapid field survey of the Project site was undertaken in August 2023 by SEES (AECOM's local partner) to define habitats and species present at the site and to identify any ecological important features (Flora and Fauna). The site walkover survey concluded that the habitats at the Project site comprised bare ground (recently cleared) in the northern eastern quadrant of the Project site, with the remainder of the Project site comprising general low herbaceous vegetation. Both of these habitats indicate that the site has been heavily disturbed and therefore comprises Modified Habitat.

Two remnant forest reserves are located within 2 km of the Project site (Demoudoulah Forest and Kakimbo Forest). In addition, there are two internationally recognised areas located within 20km of the Project site. These comprise the Konkuré IBA 15 km to the north and the Ile Blanc IPA located 20km to the south. The habitats at the Project site itself are entirely modified and are of low sensitivity, where most vegetation cover comprises invasive species. There are no animal species of conservation concern at or close to the Project site. Despite their relative proximity to the Project site, the overall impacts during construction will be **Low Adverse**.

Habitats at the Project site itself either comprise bare ground or land with a low ground coverage of plants, most of which comprise invasive plant species therefore of negligible sensitivity. Construction works and site clearance will result in loss of most of these habitats, which will be replaced by buildings, hardstanding or landscaping. The overall level of impact during construction will be **Negligible**. No endangered or otherwise notable plant species were identified at the Project site. The vegetation at the site comprises remnants of domestic plants but mainly early pioneer species, almost all of which have been identified as invasive and/or aggressive species. The field survey recorded few animal species at the Project site, all of which were common species defined as Least Concern by the IUCN. All of these species are common and are therefore of low sensitivity. The significance of the construction impact is therefore **Low Adverse** overall.

There is the potential for indirect impacts on receptors located further from the Project site boundary such as recognised or designated areas and the biodiversity features associated with them. Baseline study indicates the potential presence of at least three species of conservation concern within a 20 km radius of the Project site. These comprise the African manatee and bottlenose dolphin, associated with the Konkuré IBA / Ramsar Site, and olive ridley sea turtles, associated with the Ile Blanc IBA / Ramsar site respectively. However, construction activities are not likely to have any effect on these species and consequently the magnitude of impact can be defined as negligible. The overall impact on this species is therefore **Low Adverse**, which is not significant.

Similar to the construction phase, impacts on the recognised and designated areas, these sites have a high sensitivity due to their international importance, specifically in terms of the substantial congregations of birds associated with both areas. However, neither site is likely to be directly or indirectly affected by operational activities at the Project Site and the magnitude of any impacts would be negligible. The overall impact on these internationally recognised sites would be **Low Adverse**.

There will be no impacts on the habitats during operation. All of the species are common and are therefore of low sensitivity. The magnitude of operational impacts on these species is likely to be low as they are widespread species with stable populations, where loss of individuals will not significantly change population numbers. The significance of the operational impact is therefore **Low Adverse** overall. The following additional mitigation during operation will be required; where landscaping and planting is included as part of the design, priority will be given to using indigenous plants of local origin sourced from local nurseries / garden suppliers where possible. Care will be taken to avoid introducing ornamental species that comprise exotic / invasive species.

6.2.4 Noise and Vibration

An initial desktop study was carried out to identify noise-sensitive receptors within 250 m of the Project that have the potential to experience significant noise effects from construction and operational phase noise. A baseline sound survey in support of the proposed development was undertaken in September 2023 consisted of short-term attended daytime, evening, and night-time measurements at five different locations within the site as shown on the monitoring location plan in **Figure 6-2**. The measurements were carried out between Friday 22nd September 2023 and Wednesday 27th September 2023 for a period of one hour during the morning (06:00 – 13:00) at all locations apart from at ML-3 where a 40-minute measurement was done, for one hour during the afternoon/evening (13:00 – 22:00) and for 30 minutes during the night-time (22:00 – 06:00) at all locations.

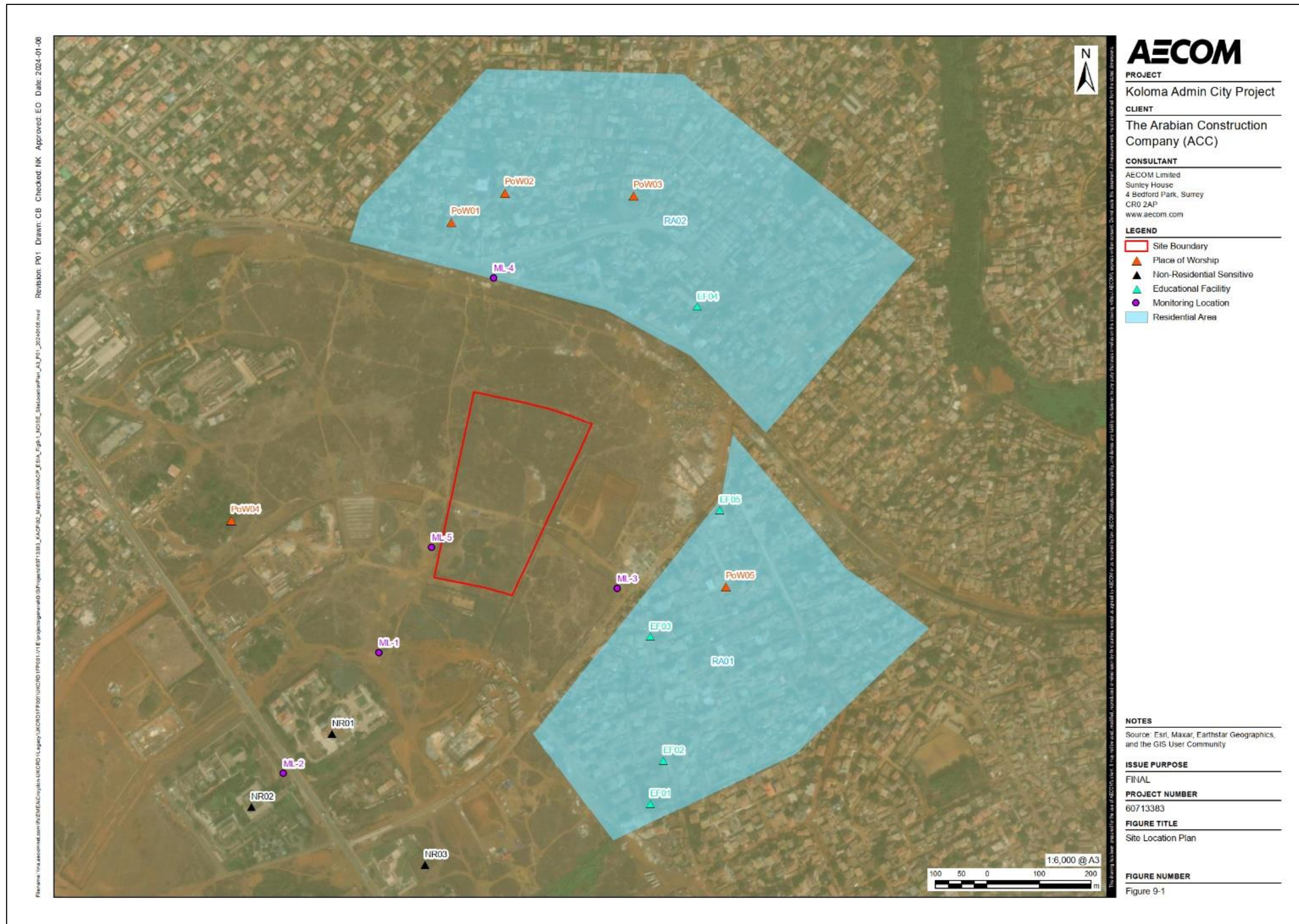


Figure 6-2: Noise measurements locations and receptors

The main construction activities associated with the project that are likely to produce high levels of noise are during the demolition and clearance works, excavation and foundation works, installation of the sub-structure and external works. Acoustic modelling software has been used to predict how sound from the site will travel in all directions and to measure the resulting noise levels at nearby sensitive locations..

The Project impacts during **construction** may include;

- Temporary disturbance due to noise from vehicles and equipment on site
- Temporary disturbance due to construction traffic noise

Noise will be greatest during the substructure stages of the works programme, where ground works are required as heavier plant is likely to be used. In practice, noise levels and resulting impacts are likely to vary during the different construction phases of the project depending upon the location of work sites and proximity of receptors. Any adverse noise effects during construction would be of a temporary nature and have no lasting residual effect.

Construction traffic movements on public roads have the potential to cause temporary disturbance while it is passing by. It is therefore important that the routing and timing of vehicle movements is carefully managed. However, any increases in road traffic noise levels during works will be temporary, relatively short term, and although the effect will be dependent on the actual number of traffic movements, it is considered that adverse effects can be managed and avoided.

The Project impacts during **Operation** may include;

- Permanent disturbance due to noise from building services plant, HVAC systems, emergency/backup power generators, wastewater handling units and wastewater treatment plant
- Permanent disturbance due to operational traffic noise

The proposed development is comprised of a total of 12 administrative buildings, two 2-storey car parks, one auditorium, one open-air theatre and one heritage pavilion building. There will be five 2,500 KVA emergency/backup power generators on the facility during the operational phase of the development. It has been assumed that external HVAC systems plant will be proposed to be located on the rooftop level of the buildings. The installation of plant on rooftops will help physically screen any noise emissions to surrounding receptors. For all other receptors, it is considered that operational noise from building services plant, HVAC systems emergency/backup power generators, wastewater handling units and wastewater treatment plant would result in an impact of **Low significance**.

Assessment of the (permanent) operational traffic phase of the Project has been scoped out as it is understood that operational traffic impacts of the Project will be assessed at the wider site development level. Due to this and given the size of the Project in the context of the wider site development, it is not expected that the Project alone will result in any significant impacts.

6.2.5 Surface Water, Groundwater and Soils

Construction activities have the potential to impact on the hydrological regime of the Project Area of Influence during the wet season. The physical changes to the land as a result of the building construction will modify and potentially adversely affect the hydrology of the catchments. Additional structures like new drainage channels, swales and outfalls will be required to redirect the run-off within the Project site surface water catchments.

The Project impacts during **construction** may include;

- Increased flood risk and changes in flow
- Degradation of water quality due to increased turbidity
- Soil erosion, compaction, and loss
- Water Source and Supply

The Project impacts during **construction and operation** may include:

- Degradation of Soil, Groundwater, and Surface Water Quality due to Contamination

The changes in the flow regime would lead to changes in the flow volumes, velocities, channel characteristics and also alter the natural sediment regime of the catchment. With the embedded mitigations and their

implementation related to the drainage, increased flood risk and change in flow regime will result in a low magnitude and low adverse initial significance impact and a **Low Adverse** residual impact.

Release of sediments can have an impact on water quality, which should be reversible over a relatively short period of time. Given the area of development and the changes to the runoff characteristics during the wet season, the degradation of surface water quality due to increased turbidity will result in a low magnitude and low adverse initial significance impact and a **Low Adverse** residual impact. In some areas there would be loss of soils and increased rates of soil erosion; in other areas there is the potential for increased deposition of soils. With additional mitigation, stripping to be restricted to only areas where this is required for construction and excavated soil will be covered with tarpaulin; soils erosion, compaction and loss will result in a **Low Adverse** residual impact.

Construction (construction activities, vehicle movements, accidental spills etc) and operational activities (vehicle activities and car washing) have the potential to impact on soil, groundwater, and surface water quality due to contamination by fuel, oil and other potentially polluting substances. During the dry season, soils could mainly be directly impacted by spills and leaks of hazardous materials, while during the wet season soils will be mainly indirectly impacted as a result of polluted discharges passing via surface water to soils. The impacts could last for the duration of the construction and operation phases and beyond. Both Spill Prevention and Water Pollution Management Plans will be implemented, and monitoring will be undertaken for pollutants quarterly (hydrocarbon and PAH every six months) with spill response equipment readily available.

During the construction phase of the Project, water will be needed for domestic purposes (drinking, washing, flushing the toilets). The impact of water sources will be short term over the duration of the construction phase of the Project. The sensitivity of the social receptors, local and wider communities have medium sensitivity. The magnitude of the impact is considered to be low given the quantity of the water being used and that the duration of the use of water would be limited to the construction phase. With the embedded mitigation measures would be applied including water usage targets, monitoring and water saving measures set out in the Project's ESMP, the significance of the impact is therefore **Low Adverse**.

The Project impacts during operation may include:

- Increased Flood Risk and Change in Flow Regime
- Water Source and Supply
- Pollution to surface water and groundwater quality due to wastewater

Operational activities have the potential to impact on the hydrological regime of the surface water catchments covering the Project site and surrounding areas particularly during the wet season. As short to medium term mitigation, Sustainable Urban Drainage Systems (SUDS) will also be set-up outside of the Project Site (surrounding land) for drainage purposes until the city drainage capacity is improved by the relevant authorities and a wider drainage plan is implemented for wider Koloma area. ACC will undertake continuous liaison with the technical departments of the competent authority, DATU, and other relevant authorities which is essential to stay updated on any new developments or changes in the masterplan regarding drainage network to minimize risks. The increased flood risk and change in flow regime at the Project site will result in a low magnitude and an overall **Low Adverse** impact.

Water use and supply during the operational phase of the Project could place additional strain on the water supply network which has a lack of capacity to cater for demand, and subsequently lead to further water shortages. A Water Management Plan for operational phase is to be developed and implemented in the operational phase to ensure the long-term effectiveness of the above measures. The Project will regularly engage with local service providers to ensure that facilities are able to cope with increased demand. Water resource management shall be included in the Project's OESMP setting water usage targets, monitoring and water saving measures. The residual impact is **Low Adverse** given the additional mitigation proposed.

Domestic wastewater that will be generated during the operational phase of the Project, is planned to be treated by an on-site wastewater treatment plant and discharged suitably with licensed disposal contractor. The magnitude of change would be negligible as all wastewater would be treated on site and discharged/disposed without a risk of contamination to the ground or surface water and the predicted potential impact significance during the operational phase from wastewater is therefore negligible.

6.2.6 Waste

Waste management in Guinea and Conakry is currently limited to one main waste disposal facility, the Minière Landfill, located in Ratoma. Three categories of waste is expected to be generated during construction phase. The Project impacts during **construction** may include;

- Management of Hazardous Construction Waste,
- Management of Non-Hazardous Construction Waste,
- Management of Inert Construction Waste

Small quantities of hazardous waste will be generated during the maintenance of the construction plant and equipment. Other activities may generate small quantities of hazardous waste such as discarded containers for hazardous construction materials (e.g., paints and other coatings containing solvents) and small quantities of biomedical waste from first aid facilities. Hazardous wastes generated by this Project are no different to those generated daily by multiple construction projects across Conakry. The management of hazardous construction waste will result in an adverse and irreversible impact of high magnitude as the management of hazardous waste is highly sensitive based on the lack of availability of waste facilities in the Country. In the absence of suitable waste management facilities in Guinea, any project that generate hazardous waste would have similar **high adverse impact** come along provision of adequate hazardous waste management facilities which is a strategic issue that need to be addressed by the national Government.

However, measures should be focussed on reducing the likelihood of harm from hazardous waste management, by auditing any vendors recycling used oils, and reducing the mobility of other hazardous wastes by, for example, allowing used paints to harden and solvent to evaporate prior to disposal.

Non-hazardous wastes during construction phase will include food waste, packaging waste from construction materials, office waste (e.g., paper) and surplus or damaged non-inert construction materials (such as wood and plastic). The current route for management of general non-hazardous waste in Guinea is disposal at the Minière Landfill. The quantities of waste generated by the Project during construction are expected to be relatively small compared to the overall quantities of non-hazardous waste generated by the region. The impact significance (initial and residual) is therefore **Low Adverse**.

Inert construction waste will comprise surplus excavated uncontaminated soil, waste concrete and asphalt, and any other similar waste materials such as bricks and tiles and rebar. The Project Proponent will identify opportunities for the beneficial reuse of inert construction waste in the vicinity of the Project Area. If no such outlets are available, the waste will be disposed of at Minière Landfill. There are numerous potential outlets for the beneficial reuse of the relatively small quantities of inert waste that will be generated. The impact significance (initial and residual) is therefore **Low Adverse**.

The Project impacts during **operation** may include;

- Management of Hazardous Waste,
- Management of Non-Hazardous Waste

Hazardous waste is likely to be minimal during its operational phase (would originate from maintenance activities). The management of hazardous operational waste will result in an adverse and irreversible impact of high magnitude as the management of hazardous waste is highly sensitive based on the lack of availability of waste facilities in the Country. The impact significance (initial and residual) is therefore **High Adverse**.

The Project will primarily cater for office-based activities that are currently carried out in the existing locations of the governmental authorities' in Conakry and hence the operational waste from the Project represents waste that would otherwise still be produced at a different location, rather than a new source of waste. In the absence of suitable waste management facilities in Guinea, any project that generate hazardous waste would have similar high adverse impact come along provision of adequate hazardous waste management facilities which is a strategic issue that need to be addressed by the national Government.

Non-hazardous waste during the operational phase of the facility is expected to make up most of the waste generated by the site. The current route for management of general non-hazardous waste in Guinea is disposal at the Minière Landfill. The Project waste during operational phase is expected to make a very small contribution to any environmental effects caused by the operation of the existing dumpsite. The impact significance (initial and residual) is therefore **Low Adverse**.

6.2.7 Traffic and Transport

An assessment was undertaken based on the Project related activities that may result in traffic impacts on the sensitive receptors in comparison to baseline conditions during construction period. A high-level qualitative assessment has been undertaken for the operational phase.

Traffic survey counts was undertaken and collected by AECOMs local partner, SEES, at five locations in the vicinity of the Project Site on one midweek day (Monday 13th November 2023) consisted of two-way link counts covering 3-hour peak periods, (07:00-10:00 in the AM) and (16:00-19:00 in the PM). The five traffic survey data locations are displayed in Figure 6-3 below and information relating to each of the survey locations is provided below.

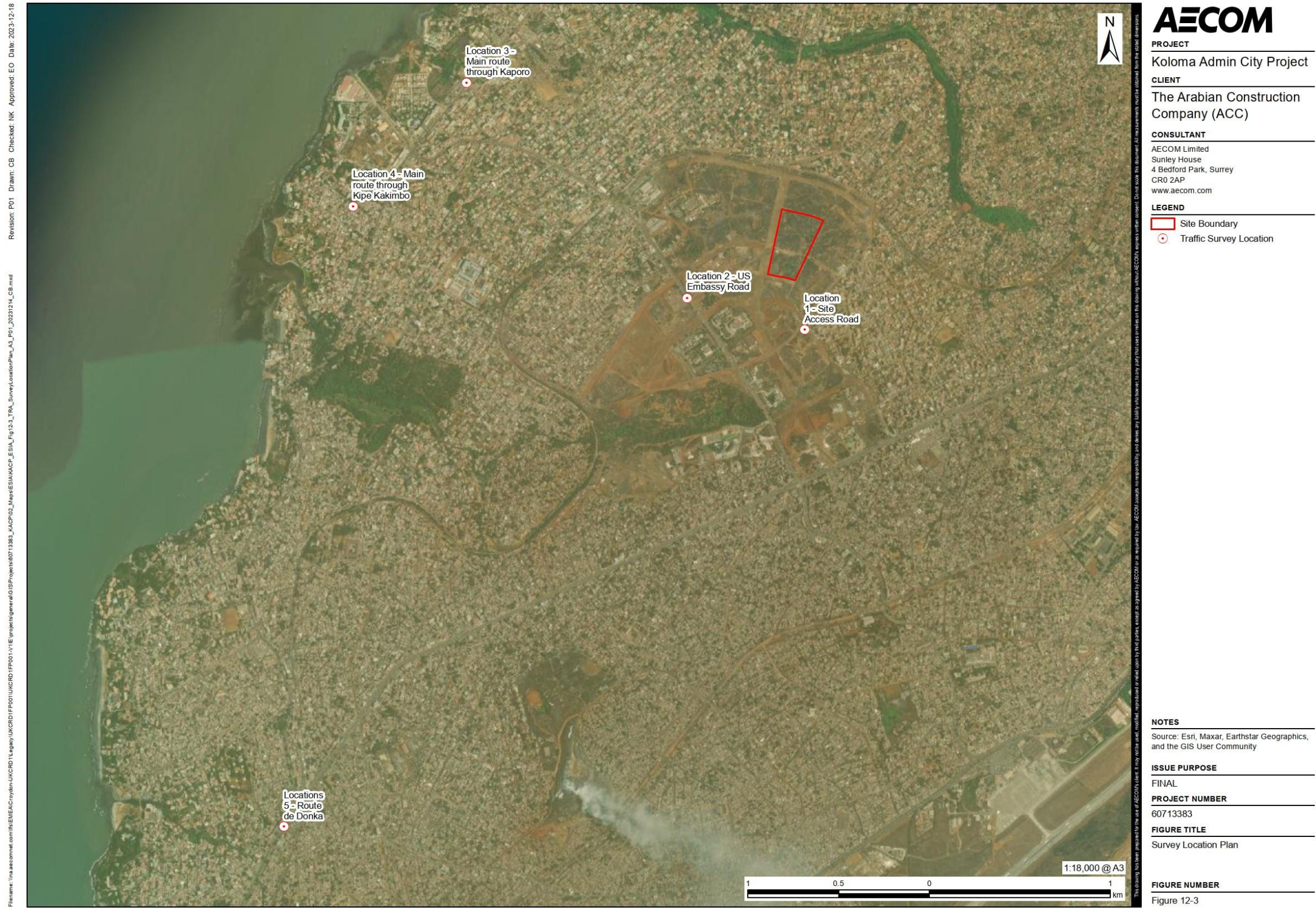


Figure 6-3: Survey Location Plan

The anticipated level of additional vehicle movements during the construction phase (as an increase to baseline flows) has been set out in the ESIA report and the forecast level of construction traffic along this link is expected to result in a high degree of change a (with maximum increase in traffic of 592.51% and 182.92% during the worst-case morning development peak hour for Location 1 - Site Access Road, RO308 and Location 2 - Transversal 2 - RO251, US Embassy Road, respectively).

The level of impact is expected to be high and therefore significant. The residual impact is expected to remain due to the uncertainties of the proposed additional mitigations at this stage. The Project company is currently exploring varying work shifts (as per the proposed additional mitigation list) with respect to the peak number of construction workers. As the construction workforce approaches to its peak, the Project company will introduce and/or provide varying shifts to reduce vehicle movements to reduce the residual impact on the identified receptors.

Given the number of employees (approx.8000) and assumed greater use of car and taxi, it is likely that the traffic flows generated during operation will be greater than those generated during construction. It has not yet been agreed which governmental authorities/ministerial bodies will be relocated to the proposed Project site and therefore the precise number of employees has not yet been determined. The trips associated with the operational phase of the Project are existing trips on the network being diverted from the existing government buildings in the city centre (Kaloum peninsula) to the location of the Project site; and as such therefore no additional trips associated with the Project will be added to the wider road network. For the operational workforce, the breakdown by transport mode is not known; however, greater number of staff will be arriving by car (up to 10%) in comparison to the construction phase. It is also assumed that more people will arrive by tuk-tuk (taxi), however the majority is likely to arrive by motorcycle-taxi. Similar to the construction phase, significant adverse impacts are expected at Locations 1 and 2 at the beginning of the operation phase. However, in the subsequent years of the operational phase, traffic load and flow are expected to decrease with the development of the road network. Given the uncertainty behind the programme, detail and final layout etc of the wider Development Plan, a longer term quantitative assessment cannot be made at this time; however, it will be necessary to prepare an Operational Traffic Management Plan as part of OESMP which will require further and study/analysis.

6.2.8 Historic Eviction

The wider Koloma area, including the Project Site was cleared of its occupants in an eviction in 2019 (following an earlier eviction in 1998). These evictions were carried out by the Ministry of Habitat and Construction and have been the subject of criticism by local communities and NGOs such as Human Rights Watch. The displacement impact felt by these evicted communities were severe and long lasting. In particular, the following issues were mentioned by the Collective of those Evicted (The Collective) and local leaders:

- **Loss of physical property:** The eviction involved the demolition of residential property, business premises and secondary structures without compensation.
- **Homelessness:** Directly after the eviction took place most people who were unable to stay with friends or family in Conakry would have become homeless until they were able to find new accommodation.
- **Loss of education:** The Collective reported that many children and minors were separated with their parents, some of whom had moved out of Conakry leaving the children in the city.
- **Loss of jobs and livelihoods:** The eviction would have likely caused many impacts on income and livelihood either through the displacement of businesses located within the Koloma area.
- **Break-up of families and loss of social networks:** It is widely reported that families became separated during the eviction and some family members left the city leaving family members behind.
- **Physical and mental distress:** The families who were evicted would have experience significant physical and mental distresses caused by the fear of eviction process and the trauma of losing a home.
- **Increased poverty:** The immediate impacts on livelihood of those evicted will have undoubtedly resulted in an increase in poverty.

These historic impacts on the community associated with displacement and associated violence have already occurred. The impact has been adverse, would have long term duration, and is not fully reversible. The spatial extent is at the local and regional level, this impact has a high magnitude. The social receptors, the displaced community, has a high sensitivity. The significance of the resulting impact is High Adverse.

Chemas prepared Resettlement Action Plan (RAP) for the Administrative City Project Site as well as a separate RAP for the wider Koloma area and an accompanying Livelihood Restoration Plan. The plans are based on the principles of IFC PS5; however, it is acknowledged that complete compliance with IFC PS5 will be impossible due to the time that has passed since the eviction. The implementation of the RAP will go a long way to helping the lives of those affected however the trauma and stress which has occurred as a result of the eviction cannot be completely undone. Assuming the full implementation of the RAP and all supporting measures (such as effective monitoring and evaluation) the residual impact is still considered **High Adverse** given that the impacts have already occurred.

6.2.9 Socio-Economic

The socio-economic area of influence (AOI) consists of the geographical area that are likely to be affected by the Project activities during construction and operation including direct AOI (comprised of Project site plus 300 m buffer), indirect AOI (up to 1 km radius) and communities around the immediate surrounding of the Project site and at a wider distance within Conakry were considered. Existing socio-economic and health data were obtained from various databases from open sources. A social study was carried out by AECOM and its local partner (SEES) between September and December 2023 included key informant interviews, Focus Group Discussions and site visit walkover. There are no indigenous peoples with traditional or customary rights to the land which were identified within the project area.

The following potential impacts were scoped in as the most relevant for the AoI and the socio-economic receptors:

During **construction**:

- Temporary Increased local employment and procurement
- Project-induced population immigration
- Potential interaction between workforce social receptors and communities
- Poor labour practices and working conditions
- Capacity strain on local public services and facilities
- Potential security related human rights violations
- Road Safety and disruption to pedestrian access
- Worker welfare and Sanitation
- Access to utilities which cross the Project site

It is expected that the construction workforce will peak at 2500. There will be also 95 supervisory and office staff (from ACC) at the peak. Most of the expected workforce will be sourced locally as much as reasonably feasible and will likely come from within Conakry hired through contracting agencies. 7.9% of the total labour force in Guinea were unemployed. Its spatial extent could reach a regional level depending on the technical needs of the construction activities and the availability of professional skills. This resulting impact would be Low beneficial. However, with the additional mitigation measures as proposed in the ESIA report further in detail, the potential benefit could have moderate beneficial (clear communication on recruitment process, priority to be given to residents in Conakry for non-specialised jobs, women to be encouraged, training to be provided to locals).

Potential Project-induced population immigration may occur from the Project announcement and the start of construction likely coming within Conakry and this will involve more men looking for work may also change the local gender balance. This impact could have a **Medium Adverse significance**. The Project has code of conduct for all employees to abide by, The Project will also implement Project's ESMP and HSMP (PGESC and PGSSC), Stakeholder Engagement Plan. With the implementation of the management plans as well as SEP, the residual impact significance will be reduced to **Low Adverse**.

Without adequate measures in place, worker behaviour can have an impact on local communities. The Project workforce may interact with local communities, which could potentially result in an increased exposure to communicable diseases, such as STIs. The local communities have a medium sensitivity. The resulting highest impact significance is **Medium Adverse**. The grievance process will be made available to the local community and will include a gender sensitive channel for reporting gender-based issues or concerns. With the additional mitigations proposed in the ESIA report (induction training, implementation of code of conduct, internal regulations, activities to raise awareness on STIs), this will reduce the magnitude of the impact to negligible and as such the residual impact significance is Low Adverse.

Poor labour practices and working conditions or subject to occupational health and safety risks. The project has already developed a HSMP (PGSSC) which includes health and safety management measures, commitments regarding worker welfare facilities and induction training. With the implementation of the PGSSC and additional mitigation measures proposed in the ESIA report, the residual impact will reduce to **Negligible Adverse**.

There is a risk that water use by the project during the construction phase could put strain on the already struggling water network and lead to water shortages or drought which would then have an impact on the local community who depend on the current water supply. Project's ESMP includes water resource management which sets out water usage targets and monitoring and water saving measures. The Project shall liaise with SEG to agree water usage limits and targets where necessary. Any change in water usage should be communicated to SEG in advance. Following this mitigation, the residual impact is **Negligible Adverse**.

There is a history of violent protests in Conakry and due to the evictions that occurred at the site the chances of industrial action against the construction of the project or in the area are slightly elevated. Any inappropriate or excessive use of force against a community member(s), unjustified detainment of community members may result in human rights violations. The risk of Security and Human rights Violations will remain medium-term duration throughout the construction phase whenever armed security is present. Pre-mitigation significance of the resulting impact is **Moderate Adverse**. As additional mitigation, developing provisions for vetting, managing and training security personnel in accordance with the Voluntary Principles of Security and Human Rights will reduce the magnitude of the impact resulting in a residual impact significance of **Low Adverse**.

The construction traffic presents a health and safety risk to community members using the roads, pavements or crossing the Koloma area. The Project's ESMP and HSMP already contains community health and safety and traffic management sections as well as embedded generic measures for the management of road safety, including visual checks on vehicles, driver tests, signs and a 10km speed limit inside the Project Site. With the implementation of the Project's ESMP and HSMP and additional mitigation measures proposed in the ESIA report, the residual impact will reduce to **Low Adverse**.

The worker welfare facilities currently under construction include prefabricated offices, built storage areas, toilets, rest and catering areas and a clinic. Within the welfare facility, ACC set up a rest room and a catering area on site. If not carefully managed, the workforce itself may also experience impacts on poor hygiene and sanitation. Pre-mitigation significance of the resulting impact is **Low Adverse**. ACC should ensure that provision of basic services to workers are managed in line with the guidance note on worker's accommodation published by IFC and EBRD (Worker's Accommodation: Processes and Standards). (IFC, EBRD, 2009). It will be ensured the Project's ESMP and HSMP (PGESC and PGSSC) are in place and implemented. With the implementation of the mitigation measures, the residual impact significance is **Negligible Adverse**.

Two community water pipes were found to be crossing the site which are linked to the water tank to the west of the site boundary. If these pipes are destroyed it will result in a reduction of water reaching the community. Once the pipelines are rerouted/new pipes are built, the water would need to be turned off for a few hours and short stop in supply will then need to be communicated to the surrounding community in advance.

During **operation**;

- Increased local employment and supply demand for local businesses
- Improved and more efficient government facilities and services
- Improved working conditions for government workforce
- Capacity strain of local public services and facilities
- Economic influx and inflation during operation
- Loss of customer base and loss of business at original sites

- Potential security related human rights violations

Employees that will work at the office complex currently work in existing government administrations on various locations across the city. The existing staff/employees will be relocated to the proposed Project site. Other operational jobs such as building, facilities and grounds management, catering, waste and cleaning and security will provide opportunities for local people. The arrival of government ministries at the Project will attract many local businesses seeking opportunities. This will include licenced service providers at the Project and also informal vendors which will likely move to the area. Resulting impact is **Moderate beneficial** significance. Locating government ministries within the same locality will likely improve the ability of said ministries to communicate and work together which will likely improve overall governance in Guinea. The Project will improve the working conditions of all government staff currently employed across Conakry. The government buildings will be improved quality, safer, more modern and more comfortable for workers (**moderate beneficial impact**).

There is a risk that water use by the project during the operational phase could put strain on the already struggling water network and lead to water shortages or drought which would then have an impact on the local community who depend on the current water supply. It is recommended that an Environmental and Social Management Plan for operational phase (OESMP) is developed and implemented in the operational phase to ensure the long-term effectiveness of the energy and resource measures. The Project will regularly engage with local service providers to ensure that facilities are able to cope with increased demand. The residual impact is **Low Adverse**.

The presence of government ministries and the economic opportunities, that will come with the Project, will cause an influx in local businesses and increases in demand for local goods and services which will also likely cause prices to be inflated which will have an adverse impact on existing residences who may not be economically involved with the project. The Project should develop a Local Content Plan and Community Development Plan which will assist local people who are at risk of being priced out the area take advantage of the increased economic opportunities. The project will also maintain its Stakeholder Engagement Plan and Grievance Mechanism. The residual impact is **Low Adverse**.

In terms of loss of customer base impact, as government ministries and their staff relocate to the administrative city, businesses based at or near the existing ministry buildings will experience changes to their customer base. The uncertainty over the number of ministries to be relocated and the number of contracted service providers at the existing buildings and informal business which serve staff there makes it difficult to quantify the impacts. It should however be considered changes of this kind are typical in a dynamic and changing economy and the fact that the ministries are not all currently located in one location will disperse the changes in customer footfall.

Any inappropriate or excessive use of force against a community member(s), unjustified detainment of community members may result in human rights violations. There will be general CCTVs, official armed police officers who are assigned responsibility to guard the government complex. The Project should conduct a Security and Human Rights risk assessment and the risks should be managed primarily through the selection of reputable security firms which meet international practice, but should also include the provisions for vetting, managing and training public and private security personnel in accordance with the Voluntary Principles of Security and Human Rights reducing the magnitude of the impact resulting in a residual impact significance of **Low Adverse**.

6.2.10 Archaeology and Cultural Heritage

Construction activities would introduce noise, dust, light and increased traffic to the Project Site for the duration of the construction phase. These would result in the loss of tranquillity at the two cemeteries within the Study Area during parts of the day and/or night for the duration of the construction phase. The same noise, dust, light and traffic derived from construction activities would, however, result in no changes to the setting of the nearest mosques or other religious sites which are already located within dense urban neighbourhoods surrounding Kapor-Rails. However, given the distance separating the Project Site from these receptors, construction activities would only result in a negligible change to our ability to understand and appreciate the receptors.

Construction activities have the potential to impact on previously unknown archaeological remains which survive below the level of modern ground disturbance. This potential has been greatly eroded by modern developments and two phases of land clearance. However, given the unknown depth of archaeological horizons, remains from any period of prehistory and history could survive within the Project Site. These are likely to have been truncated or disturbed and would therefore be considered of, at most, medium sensitivity to change. Intrusive construction activities such as, but not limited to those resulting from levelling, clearance, utilities installation, drainage, foundations and basements could result in the complete removal or truncation of archaeological features.

Therefore, archaeological remains of up to medium sensitivity would be subject to a high magnitude of change, resulting in **High Adverse** impact significance prior to mitigation and **Low Adverse** residual impact.

In order to mitigate risk of impacts to previously unrecorded archaeological remains during construction, the Project will implement a Chance Finds Management Plan to be secured in the Environmental and Social Management Plan (PGESC).

6.2.11 Cumulative Impact Assessment

The ESIA provides an assessment of the potential cumulative effects of the Project together with other existing/planned developments that may also have effects within the Project's Area of Influence (Aol). The approach to this Cumulative Impact Assessment (CIA) is based on the IFC's Good Practice Handbook to Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets (2013) (IFC, 2013). Rapid CIA (RCIA) was undertaken within the scope of the ESIA based on the Project's residual impacts. The Project's impact significance is based on the results of the ESIA; a judgment is then made on whether the additional impacts from other developments would increase the overall significance of the impact.

Key adverse cumulative impacts for wider Ratoma area are increased flood risk, additional pressure on water supply, generation of hazardous waste, an increase in traffic, and impacts associated with historic resettlement. Based on the cumulative impacts assessment, mitigation measures are recommended and responsible organizations and stakeholder engagement mechanisms are proposed for monitoring and coordination. Further details of the RCIA are presented in ESIA report.

6.2.12 Summary Impact Table

A summary of residual impacts for each environmental and social aspects covered within this ESIA study are presented further in Table 6-1 below.

Table 6-1: Summary of Impacts

Aspect	Project Phase/Stage	Impact ID	Impact	Additional Mitigation	Residual Impact
Air Quality	Construction	AQ01	Dust soiling affecting amenity and vegetation on the surrounding existing residential areas, existing educational / research facilities, and existing Places of Worship.	None required beyond embedded mitigation. Monitoring plan to be developed.	Low Adverse
		AQ02	Change in ambient concentrations of air pollutants (PM ₁₀ , PM _{2.5} , SO ₂ , CO, NO ₂) in vicinity of construction site from construction plant and road traffic on surrounding road network	None required – temporary works	Negligible
	Operational	AQ03	Change in ambient concentrations of air pollutants (PM ₁₀ , PM _{2.5} , SO ₂ , CO, NO ₂) in vicinity of site from emergency generators	None required beyond embedded mitigation.	Negligible
Biodiversity	Construction	TE01	Physical Loss, Fragmentation and/ or Reduction/Loss of Ecological Function: <ul style="list-style-type: none"> • Demoudoulah and Kakimbo Forest Reserves (No additional mitigation required.) • Konkuré & Ile Blanc IBA / Ramsar Sites (No additional mitigation required.) • Urban mixed habitats, including bare ground, areas of herbaceous coverage 	<ul style="list-style-type: none"> • Site boundaries shall be marked prior to site clearance work. Fencing shall be open enough to allow animals to escape from the site during site clearance. • Where any felling of trees is required, these shall be removed first and soft-felling techniques shall be used where appropriate. • A watching brief by trained personnel (e.g., an environmental clerk of works) shall be kept, to look out for any animals and to allow them enough time to escape. • Where possible topsoil shall be retained for use in subsequent landscaping. • Except for security and safety oriented peripheral lighting, exterior lighting shall be planned in low angles and be directional to reduce light pollution. 	<ul style="list-style-type: none"> • Low Adverse
		TE02	Decrease in Abundance and/or Conservation Status of Plant Species	<ul style="list-style-type: none"> • Based on the requirements of Objectives 9.3 & 9.4 of the Guinea National Biodiversity Strategy, there is a requirement to control the introduction of invasive / exotic species. Therefore, any invasive plant species and/or plant waste material, including waste soils that may contain plant material, will be treated to destroy that plant material prior to being disposed of off-site or reused on-site. <p>Any soil brought onto the site should be checked for the presence of invasive species that may be introduced and/or spread.</p>	Low Beneficial

Aspect	Project Phase/Stage	Impact ID	Impact	Additional Mitigation	Residual Impact
		TE03	Disturbance to Individuals and/or Populations Reductions and/or Conservation Status of Animal Species; <ul style="list-style-type: none"> • Common mammals, reptiles, amphibians and birds • African Manatee (VU) (No additional mitigation required.) • Bottlenose Dolphin (DD) (No additional mitigation required.) • Olive ridley sea turtle (EN) (No additional mitigation required.) 	A watching brief by trained personnel (e.g., an environmental clerk of works) shall be kept, to look out for any animals and to allow them enough time to escape.	Low Adverse
	Operational	TE04	Physical Loss, Fragmentation and/ or Reduction/Loss of Ecological Function: <ul style="list-style-type: none"> • Demoudoulah and Kakimbo Forest Reserves (No additional mitigation required.) • Konkuré & Ile Blanc IBA / Ramsar Sites (No additional mitigation required.) • Urban mixed habitats, including bare ground, areas of herbaceous coverage 	Should any aspect of the design change to include development of additional land, the Management of Change Procedure shall be applied and necessary	<ul style="list-style-type: none"> • Low Adverse •
		TE05	Decrease in Abundance and/or Conservation Status of Plant Species; Common plant species (mainly invasive species)	Where landscaping and planting is included as part of the design, priority will be given to using indigenous plants of local origin sourced from local nurseries / garden suppliers where possible. Care will be taken to avoid introducing ornamental species that comprise exotic / invasive species.	Low Beneficial
		TE06	Disturbance to Individuals and/or Populations Reductions and/or Conservation Status of Animal Species ; <ul style="list-style-type: none"> • Common mammals, reptiles, amphibians and birds • African Manatee (VU) (No additional mitigation required.) • Bottlenose Dolphin (DD) (No additional mitigation required.) • Olive ridley sea turtle (EN) (No additional mitigation required.) 	Should any aspect of the design change to include development of additional land, the Management of Change Procedure shall be applied and necessary	Low Adverse
Noise and vibration	Construction	NV01	Temporary disturbance from works noise	None required beyond embedded mitigation.	Negligible/Low Adverse

Aspect	Project Phase/Stage	Impact ID	Impact	Additional Mitigation	Residual Impact
		NV02	Temporary disturbance from traffic noise	None required beyond embedded mitigation.	Low Adverse
	Operational	NV03	Permanent disturbance from building services plant, HVAC systems, emergency/backup power generators, wastewater handling units and wastewater treatment plant	None required beyond embedded mitigation.	Low Adverse
Surface water, groundwater, and soil	Construction	SW01	Increased flood risk and change in flow regime	None required beyond embedded mitigation.	Low/ Negligible Adverse
		SW02	Degradation of water quality due to increased turbidity	None required beyond embedded mitigation.	Low Adverse
		SW04	Water source and supply	None required beyond embedded mitigation.	Low Adverse
		S01	Soil erosion, compaction, and loss	Only stripping the soil required for construction Cover excavated soil with tarpaulin	Low Adverse
	Construction and Operational	S02	Degradation of soil quality due to increased pollutants	Develop and implement a Spill Prevention Plan/Water Pollution Management Plan Monitor for pollutants (quarterly and hydrocarbons and PAH every six months) Spill response equipment readily available.	Low Adverse
		GW01	Degradation of groundwater quality due to increased pollutants		Low Adverse
		SW03	Degradation of surface water quality due to increased pollutants		Low Adverse
	Operational	SW05	Change of flow regime and flood risk	SUDS will also be set-up outside of the Project Site (surrounding land) for drainage purposes until the city drainage capacity is improved by the relevant authorities and a wider drainage plan is implemented for Koloma area.	Low Adverse
		SW06	Water source and supply	The Project will regularly engage with local service providers to ensure that facilities are able to cope with increased demand. Water resource management shall be included in the Project's OESMP setting water usage targets, monitoring and water saving measures.	Low Adverse
		SW07	Pollution to surface water and groundwater quality due to wastewater	Necessary permits and protocols to be obtained and maintained for with the relevant authority related with the collection and transfer effluents.	Low Adverse
Waste Management	Construction	WM01	Management of hazardous waste	Audit any vendors recycling used oils Reduce mobility of other hazardous wastes by, for example, allowing used paints to harden and solvent to evaporate prior to disposal	High (Significant)

Aspect	Project Phase/Stage	Impact ID	Impact	Additional Mitigation	Residual Impact
		WM02	Management of non-hazardous waste	None required beyond embedded mitigation.	Low Adverse
		WM03	Management of inert waste	None required beyond embedded mitigation.	Low Adverse
	Operation	WM04	Management of hazardous waste	Audit any vendors recycling used oils Reduce mobility of other hazardous wastes by, for example, allowing used paints to harden and solvent to evaporate prior to disposal	High (Significant)
		WM05	Management of non-hazardous waste	None required beyond embedded mitigation.	Low Adverse
Traffic and Transport	Construction	TR01 - Location 1	Increase in traffic movements, as a result of construction Heavy Goods Vehicles (HGVs) and construction staff vehicles Increase in traffic movements	Encourage workers to use non-motorised modes. Implement and/or provide varying shifts of work	High (Significant)
		TR02- Location 2			High (Significant)
		TR03- Location 3		None required beyond embedded mitigation.	Low Adverse
		TR04 - Location 4			Negligible Adverse
		TR05- Location 5			Negligible Adverse
Socio-economic	Pre-Design Phase	SE 01	Historic Eviction & Displacement	RAP & LRP	High Adverse
	Construction	SE 02	Temporary increased local employment and supply demand	Enhancement measure: The project will develop a local content plan	Moderate Beneficial
		SE 03	Project-induced population immigration	Project's ESMP and HSMP (PGESC and PGSSC) and Labour Management plan along with SEP will contain steps to manage project induced in-migration	Low Adverse
		SE 04	Potential interaction between workforce and communities.	Project's ESMP and HSMP (PGESC and PGSSC) and Labour Management plan should be update to include measures on worker behaviour.	Low Adverse
		SE 05	Poor labour and working conditions	The project will develop and implement a Labour Management Plan	Negligible Adverse
		SE 06	Capacity strain of local public services and facilities	Engage with SEG to agree water usage limits	Negligible Adverse
		SE 07	Potential security related human rights violations	The project will develop and implement a Security Management Plan	Low Adverse

Aspect	Project Phase/Stage	Impact ID	Impact	Additional Mitigation	Residual Impact
		SE 08	Road Safety and disruption to pedestrian access	Project to implement a Traffic Management Plan The speed limits should be communicated with the drivers. Site specific details of high risk junctions and convergence points between pedestrian walkways and roads should be identified along the route with specific risk management measures in place.	Low Adverse
		SE 09	Worker welfare and Sanitation	Provision of basic services to workers are managed in line with Worker's Accommodation: Processes and Standards. (IFC, EBRD, 2009).	Negligible Adverse
		SE 10	Access to utilities which cross the site	Re-route/replace any affected utilities	Low Adverse
	Operation	SE 11	Increased local employment, local opportunities and supply demand	Not Required	Moderate Beneficial
		SE 12	Improved and more efficient government facilities and services	Not Required	Moderate Beneficial
		SE 13	Improved working conditions for government workforce	Not Required	Moderate Beneficial
		SE 14	Capacity strain of local public services and facilities	The Project will regularly engage with local service providers to ensure that facilities are able to cope with increased demand.	Low Adverse
		SE 15	Economic Influx and Inflation during operation	Local Content Plan, Community Development Plan, Stakeholder Engagement Plan and Grievance Mechanism	Low Adverse
		SE 16	Loss of customer base and loss of business at original sites	Local Content Plan, Community Development Plan, Stakeholder Engagement Plan and Grievance Mechanism	Low Adverse
		SE 17	Potential security related human rights violations	The project will develop and implement a Security Management Plan	Low Adverse
Archaeological and cultural heritage	Construction	ARCH 01	Disturbance, damage, removal	Chance Finds Management Plan (PGESC) Cultural Heritage Awareness Training (PGESC) Archaeological Watching Brief & Excavations (if required)	Low Adverse
		SACR 01 and 02	Changes to visual amenity and tranquillity	Traffic management	Negligible Adverse
	Operation	SACR 01 and 02	Changes to visual amenity and tranquillity	Not Required	Negligible Adverse

