

## West African Gas Pipeline Project – Clarifications Regarding Marine Pollution

1. Following the June 1, 2006 Management Response to the Request for Inspection of the Ghana: West African Gas Pipeline Project, the Inspection Panel visited the site and subsequently requested Management to provide clarifications regarding pollution in the fishing area between Badagry and Tafi villages in Nigeria (the Ajido fishing community). In a communication to the Panel during its field visit, the local fishermen expressed their serious concern regarding the presence of a brownish-green sludge-like material. They report that this sludge is affecting their ability to catch fish, and they believe it could be a result of WAPCo's drilling operations in the area.
2. In response to the Panel's request, Management sought WAPCo's cooperation in undertaking an urgent preliminary investigation into the matter. WAPCo's environmental team then organized meetings with the affected fishermen to better understand the problem. WAPCo has cordial relations with the Ajido and Paako (the Island) fishing communities, and verbal discussions between WAPCo and a representative from the Ajido community suggest that the fishermen are facing two issues in the region, namely: (a) the fishing nets are not going deep enough into the water; and (b) the sludge-like material is catching on their fishing nets.
3. WAPCo visited the site on June 22, 2006 in the company of the community representative to Ajido, where they met with the chief fisherman and several other local fishermen at Ajido. The fishermen stated that since May 2006 they have been noticing some brownish-green sludge-like substance on their nets and they have been unable to "reach the bottom." They have encountered this problem not in the open water, but rather in Badagry Lagoon, a brackish-water system between the mainland and the barrier island. WAPCo purchased from the fishermen a sample used net so that it could analyze the substance. During the meetings with the affected fishermen, WAPCo explained the process for Horizontal Directional Drilling (HDD) for the lagoon crossing, using illustrations, to show that the drilling occurs beneath the bottom of the lagoon and beneath the seafloor out to 8 meters water depth.
4. This meeting was followed by several other face-to-face meetings with the affected fishermen (including the chief fisherman), further site visits to Ajido, the physical sampling of the substance, and discussions among WAPCo's construction engineers and Health, Safety, and Environmental (HSE) auditors. WAPCo's conclusion is that the brownish-green substance is a filamentous green alga, tentatively identified as a species of *Spirogyra*. At one stage of its life cycle, *Spirogyra* can take on a brownish color, which may explain why some fishermen describe the substance in their nets as brown and others as green. WAPCo also noted that there are municipal wastewater discharges into the creeks, and these are a likely source of nutrients that could cause an accumulation of algae in the lagoon greater than normal. Given that the substance appears to be plant material, that its location is in the lagoon and not the marine environment, and that, according to WAPCo, the HDD process in the area was completed smoothly, WAPCo has concluded that the problem encountered by the Ajido fishing community is not related to the installation of the gas pipeline.

5. Bank staff have also reviewed the information provided by WAPCo. HDD was recommended in the Environmental Impact Assessment for WAGP as the method of choice for the lagoon crossing and the beach crossings in Nigeria, Benin and Togo. It is not the least-cost technique, but has been proven to be the best process in preventing damage to sensitive aquatic environments, when compared to the conventional method of sheet piling, excavating and backfilling. HDD was therefore specifically chosen by WAPCo for the lagoon crossing at Badagry as the preferred method to minimize disturbance to this sensitive area. The HDD work in the Lagos Beach shore approach (457m) was completed on March 14, 2006 and the Badagry Lagoon crossing (983m) was completed on April 12, 2006. WAPCo also noted that this operation has been done successfully in Benin and Togo without any reported incident.

6. Based on the above noted clarifications and the methods employed in drilling and laying the pipeline in the lagoon and Badagry Creek, ***Management believes it is unlikely that the substance found on the nets is related to WAPCo's operations.*** The next Bank supervision mission is scheduled for September 2006, but prior to that, in July 2006, an environmental staff specialist from the Bank's Abuja office will visit the site to follow up on the matter with the fishermen, local government (including its environmental unit), and WAPCo field staff to ensure that this matter is appropriately referred to the Nigerian environmental authorities. Management will advise the Inspection Panel of the outcome of these visits.

## West African Gas Pipeline Project – Letter from Friends of the Earth-Ghana

**Introduction.** Following the June 1, 2006 Management Response to the Request for Inspection of the Ghana: West African Gas Pipeline project, on June 14, 2006, the Panel forwarded a letter from Friends of the Earth – Ghana (FOE), dated June 9, 2006. The letter raises concerns about consultation, safety and adverse livelihood consequences for fishermen in Ghana as a result of the construction and operation of the pipeline, and asks that FOE be added to the initial Request. This is Management’s response to the issues raised in that June 9, 2006 letter.

*These issues were raised by FOE in meetings with Bank staff during the November 2004 appraisal mission, as well as during the June 2005 supervision mission. Continued consultations are planned during implementation and Management welcomes any new information to better manage these risks.*

**Item 1.** FOE states that while the importance of consultation was recognized in the design of the Project, the issue of consultation was not handled adequately in practice. FOE states that Ghana’s Energy Commission had raised concerns about the Project’s long term economic benefit to Ghana. FOE believes that these concerns have not been taken into account in the consultation process.

*In September 2004, an open public forum was held in Accra, specifically to disclose the results of the economic analysis of the Project and provide all interested parties, including the Energy Commission of Ghana, an opportunity to give input, which the Energy Commission did through its consultants from Rambøll. Bank staff conducted a round of consultations in all four countries in connection with appraisal to evaluate WAPCo’s public participation program. Five formal meetings or workshops as well as other informal consultations were held in Ghana by WAPCo and its consultants during preparation of the Ghana environmental and social impact assessment. In addition to the Nigeria consultations described in the Management Response, the Project Appraisal Document (PAD) details the consultations held in Ghana, Benin and Togo.*

**Item 2.** FOE notes that the EIA identified the importance of an emergency response system, but is concerned as to whether local people will be able to utilize and understand such a system in the case of an accident. FOE cites several instances of oil and gas related accidents and doubts that Ghana has the capacity to respond to such accidents.

*Past accidents are of concern to both the Bank and WAPCo. WAPCo completed its system-wide emergency response plans in May 2006, and these are now being disclosed. WAPCo will hold open public meetings with all communities affected by the Project to discuss proposed site-specific response plans and obtain community feedback. The main purpose of these meetings is to ensure that the response plans are practical and fully understood by communities, and to clearly define the actions to be taken by all parties – WAPCo, local and national authorities, and community members – in the event of an accident. The expert panel will review the plans during its first mission and will advise Government, the Bank, and WAPCo concerning their adequacy. (See June 1, 2006 Management Response, paragraph 57)*

**Item 3.** While FOE recognizes that the planned route of the pipeline does not pass sensitive fisheries ecosystems, it believes that the Project sponsors should assess the pipeline’s impacts on fisheries and livelihoods and that the Bank should ensure that continued impact assessments are conducted to avoid any negative Project impacts on livelihoods and the fisheries ecosystem. Local consultations should include all communities along the coastline given the migratory patterns of the fishermen.

*It was not cost-effective to consult with every coastal community; instead, consultations were held in major fishing centers, with a focus on coastal communities in the vicinity of pipeline landfalls. Chief fishermen and other representatives of the fishing communities participated in these*

*consultations. During Bank appraisal of WAPCo's community participation, staff spoke with fishing community representatives in all four countries. Through WAPCo's community development program, the NGOs contracted to assist in program implementation and WAPCo's own community liaison officers will continue to remain engaged with all communities along the pipeline right-of-way and in coastal areas surrounding pipeline landfalls for several years. This affords community members, including fishermen, ready lines of communication to raise any concerns about project impacts. Moreover, the environmental monitoring plan for WAGP includes assessment of fishery and livelihood impacts, which will be undertaken by independent consultants Bank supervision and the independent expert panel will have these issues on their agenda as well.. (See June 1, 2006 Management Response, paragraph 57)*