

Sugar cane to ethanol project, Sierra Leone

**PUBLIC DISCLOSURE PLAN
ENVIRONMENTAL SOCIAL HEALTH IMPACT ASSESSMENT**

Prepared for:



Prepared by:



Coastal & Environmental Services

GRAHAMSTOWN
P.O. Box 934
Grahamstown, 6140
046 622 2364
Also in East London
www.cesnet.co.za

October 2009

Public Disclosure and Review of Addax Bioenergy Draft Environmental Social Health Impact Assessment

Sierra Leone, 30 October – 30 November

This public disclosure and review plan of the draft ESHIA is part of Addax Bioenergy Stakeholder Engagement Plan (SEP). Further details on the SEP can be found in the Addax Bioenergy ESHIA.

Regulations and requirements for stakeholder engagement and public disclosure

International guidelines

In terms of international standards, the International Finance Corporation's (IFC's) environmental and social performance standards are regarded as the benchmark for international best practice. IFC Performance Standard 11 stipulates the following for stakeholder engagement:

- When local communities may be affected by risks or adverse impacts from a project, the project will include consultation with them.
- Community engagement will be free of external manipulation, interference or coercion and intimidation and conducted on the basis of timely, relevant understandable, inclusive, culturally appropriate and accessible information.
- Disclosure will occur early in the social and environmental assessment process (scoping phase) and on an ongoing basis.
- The project proponent will disclose the ESHIA assessment document, which is the result of a social and environmental assessment. It will focus on the social and environmental risks and adverse impacts and the proposed measures and actions to address impacts.
- Affected communities will be provided with opportunities to express their views on project risks, impacts and mitigation measures and allow the project proponent to consider and respond to them.
- The proponent will establish a grievance mechanism to receive and facilitate resolution of the affected communities' concerns and grievances about the proponent's environmental and social performance. It should address concerns promptly, using an understandable and transparent process that is culturally appropriate and readily accessible to all segments of the community at no cost and without retribution. The mechanism should not impede access to judicial or administrative remedies.

The IFC Handbook states the following:

- Stakeholder engagement is based on a thorough stakeholder analysis and engagement strategies tailored to the needs of each stakeholder.
- The stakeholder engagement is run as a business function and integrated in the business.
- It is driven by a well-defined strategy and has a clear set of objectives, timetable, budget, and allocation of responsibilities. All company staff is made aware of the Plan and its activities. Senior managers stay involved with stakeholder activities.

Sierra Leone legislation

The Environmental Protection Act of Sierra Leone (2000) regulates the environmental assessment process. It is congruent with international standards and states that communities, interested parties and government ministries should be consulted during the ESHIA process. However, its scope is much smaller and the main focus is on consultation during the ESHIA review or disclosure stage.

There is no national policy as such on public disclosure. However, the Environmental Protection Act, 2008 (section 27(1) and (2)) states that the Environmental Protection Agency shall circulate an environmental impact assessment to various bodies and also release it for public inspection and comments in the National Gazette and newspapers for a specified time period. There are specific regulations developed by the Environmental Department that are currently in force, and these will be complied with.

Public Disclosure of the draft Scoping Report

CES and CEMMATS held four public meetings to disclose the draft Scoping Report and present information about the proposed project at the end of the scoping process in March 2009. This enabled Interested and Affected Parties (I&APs) to ask questions and make comments or raise concerns regarding the proposed development. Meetings were arranged in the areas where people could potentially be affected, and residents from all the potentially affected areas were invited to attend. The list of meetings held is summarized in the ESHIA and minutes of the meetings were presented in the draft Scoping Report. The success of this process was demonstrated by the large number of people who attended the meetings. The attendance registers for these meeting and the issues and responses raised in these meetings were presented in the Scoping Report.

In addition Addax have progressed the development of land leases. A final draft lease agreement was developed by Sierra Leone attorneys in May 2009. Addax has held a series of meetings with the Government, District Administration, local authorities, Chiefdom council, Paramount Chiefs, land owners and local communities including their solicitors in the respective Chiefdoms in June, July and September 2009 (more details in the ESHIA and RPF).

Public Review of the draft ESHIA report 30 October- 30 November

The public review period of the Addax Bioenergy draft ESHIA is 30 October to 30 November. The specialist reports, the draft ESHIA report including an executive summary and the framework ESMP will be presented at meetings with Interested & Affected Parties on 30 October – 6 November. Presentation and other visual material will be used for the meetings. All reports will be made available to stakeholders in two local libraries in Makeni and two in Freetown, as well as on the CES website. Copies of reports will also be provided at the three Chiefdoms. To facilitate the participation of local stakeholders, mail boxes at various villages and in Freetown will be set up to enable villagers to provide further comment, either directly or through the village head, Chiefdom Council members or Paramount Chiefs.

The following activities are planned:

- Comments from the different stakeholders will be elicited, discussed and documented during a series of community meetings. All comments from the review period will be compiled and added as a separate section to the ESHIA report.

-
- The release of the draft EHSIA will be advertised in; 3 national newspapers, 3 local radio stations and 1 national radio station.
 - Besides a general invitation for stakeholders to participate, individual invitations were sent to the following people in each of the 117 villages in the proposed project area: Chief/ headman, 2 land owners, 1 woman's organization, and 1 youth organization. If there are schools or clinics in the area, one representative from each will also be invited. The above categories of people will have their transportation costs covered to attend the meeting, but anyone can attend the meeting if they so wish.
 - CES and CEMMATS are also inviting the people in the attached stakeholder list to the meetings in Makeni and Freetown. All residents are invited to attend the meetings, but the specific people mentioned above have been targeted.
 - The full copies of the reports will be placed in; two libraries in Freetown (hard copies and CD copies); two libraries in Makeni (hard copies and CD copies)
 - A copy of the draft EHSIA and ESMPs will be left in the Chiefdom headquarters in the affected chiefdoms (3 in total). Eight Post boxes are being placed in strategic locations within the study area where local communities can submit their comments.
 - The draft ESHIA and Specialist reports will also be available on the CES website.
 - Comments can be submitted vocally at the meetings, telephonically through CEMMATS representative, Ms Aminata Kamara, via email to CES representative, Ms Naomi Richardson or CEMMATS, Ms Aminata Kamara, and by post to CEMMATS (Ms Aminata Kamara).
 - CES and CEMMATS have three community meetings scheduled in the three affected Chiefdoms on three separate days. CES and CEMMATS have also organized meetings with local government representatives and NGOs in Makeni. The key findings of the ESHIA process will be presented and participants will be given an opportunity to ask questions and raise concerns at each meeting.
 - CES and CEMMATS have a national government and NGO meeting scheduled in Freetown. The key findings of the ESHIA process will be presented and participants will be given an opportunity to ask questions and raise concerns at each meeting .
 - CES and CEMMATS have visited the villages prior to the meeting and handed out invitations. The total number of villages is 117. The total number of invited stakeholders from the villages is 585. This excludes the Civil Society and Government institutions in Makeni. The total number of stakeholders identified for the meeting in Freetown is 80. The venue is Santanno House.

Additional information can be found in Annexes 1-4.

ANNEX 1 – Public Notification of the Public Disclosure

NOTIFICATION FOR PUBLIC DISCLOSURE OF ADDAX BIOENERGY LTD ENVIRONMENTAL, SOCIAL AND HEALTH IMPACT ASSESSMENT (ESHIA) - 30 OCTOBER TO 30 NOVEMBER 2009

This pamphlet serves to notify interested and/or affected persons/parties of the draft Environmental, Social and Health Impact Assessment (ESHIA) conducted of the Addax Bioenergy project to be developed in Makari Gbanti, Bombali Shebora and Malal Marah Chiefdoms of Bombali and Tonkolili Districts in Northern Sierra Leone.

Addax intends to develop a large sugar cane plantation and a 90,000 m³/yr processing plant to produce ethanol as a biofuel for the European market. The feedstock will consist predominantly of sugar cane from the plantation. The potential to use other agricultural crops such as cassava, groundnut, and to source feedstock from outgrowers (small-scale local farmers) and the regional market is currently also being explored.

The sugarcane to ethanol plant will be built on site and it is anticipated that the factory will be able to produce substantially more electricity than is required to run the factory and make this power on the national electricity grid. The ethanol produced at the factory will be transported to the Addax terminal in Freetown by road, for sale to Europe.

In terms of international standards and the laws of Sierra Leone, the Addax Bioenergy project needs to be planned and designed in a manner that minimizes the potential negative social and environmental impacts and maximize the benefits. This will be achieved through the ESHIA Process that the consultants, Coastal Environmental Services (CES) (in association with local counterpart CEMMATS have been contracted to undertake. This assessment began in January 2009 and is now at the stage where the results need to be presented to all the interested and affected stakeholders for discussion and finalization. CES and CEMMATs propose to start the stakeholder engagement process on the 30th October 2009.

The following specialist studies have been undertaken as part of the ESHIA to satisfy relevant laws and regulations of Sierra Leone and International Financial Institutions:

- Biodiversity and Ecological Assessment
- Hydrology and Surface Water Assessment
- Preliminary Sustainability Appraisal of Agricultural Production
- Land Use Analysis
- Social Impact Assessment
- Resettlement Policy Framework
- Preliminary Visual Impacts Assessment
- Waste and Co Products Management Study
- Air Quality Impact Assessment
- Infrastructure & Transport Assessment
- Greenhouse Gas Lifecycle Assessment
- Baseline Carbon Stock Assessment
- Fisheries and Inter Catchment Transfer Assessment
- Desktop Health Assessment

A series of meetings took place from January 2009 to date, between the project proponent

(Addax Bioenergy, CES & CEMMATS) and all stakeholders, as part of a public participation and disclosure process. The results of the specialist studies listed above will now be disclosed in a Draft ESHIA and placed in the Sierra Leone Library, Njala University Freetown Campus), Fourah Bay College (University of Sierra Leone) and Fatima Institute in Makeni for comments by Stakeholders. Electronic copies of the report can also be obtained on the CES website (www.cesnet.co.za) from the 30th October to 30th November 2009. A number of Addax Mailboxes will also be mounted in the project area as part of the Grievance mechanism Addax put in place. Any comments on the ESHIA that Stakeholders wish to submit should be made verbally at the public meetings or placed in these mailboxes between the 30 October and the 30 November 2009.

Details of the dates and venues for the various public disclosure meetings:

Date	Time	Venue
25-31 Oct	Radio	Advert in Makeni, SLBS & FM 98
31-Oct	10:00 a.m.	Mabunth, Bombali Shebora Chiefdom
01-Nov	10:00 a.m.	Manewa, Malal Marah Chiefdom
02-Nov	10:00 a.m. 2:30 p.m.	Fatima Institute - Makeni MAFFS, Makeni
03-Nov	10:30 a.m.	Makari Gbanti Chiefdom Headquarter
04-Nov	10:00 a.m.	Archbishop Brosnahan Memorial Hall, Santanno House, Howe Street, Freetown
05-Nov		Njala University Campus, Freetown Fourah Bay College, Addax Office

We would like to invite you and other key stakeholders to participate in the consultation process for the Addax project. For more information on these meetings please contact Aminata Kamara on 00232 76 770566 or amshekam@yahoo.co.uk. Your input and any issues or insights that you may have regarding the project will be valuable in the specialist investigations. Comments can be submitted verbally at the stakeholder workshops or in written format. Written comments must be either placed in the Addax post boxes on site, or posted to Cemmats Group Ltd, 7A Cantonment Road, Off King Harman Road, Freetown or via email to CES at the contact details provided below. We look forward to your participation in the consultation and disclosure process.

Consultant: CES

Contact: Naomi Richardson Tel: 00274-66222-364

Email: n.richardson@cesnet.co.za

Consultant: Cemmats

Contact: Aminata Kamara Tel: 00232-76-770-566

Email: amshekam@yahoo.co.uk

Addax Bioenergy:

Contact: Andrew Turay Tel: 00232-76-697-032

Email: andrewturay@yahoo.com

ANNEX 2 – Addax Letter of invitation for the Public disclosure

21st October 2009

To Whom It May Concern

Dear Sir/Madam,

Subject: Letter of Invitation to Public Disclosure of the Environmental Social and Health Impact Assessment (ESHIA) of Addax Bioenergy Project Activities in Makarie Gbanti, Bombali Shebora and Malal Marah Chiefdoms - Bombali District and Tonkolili District

Addax Bioenergy Ltd contracted Coastal Environmental Services (CES) Ltd to carry out an Environmental Social and Health Impact Assessment (ESHIA) of their proposed concession area in Makarie Gbanti, Bombali Shebora and Malal Marah Chiefdoms, Bombali and Tonkolili Districts. CES has subcontracted Cemrats Group Ltd as local consultants.

Addax Bioenergy intends to develop a new large sugar cane plantation and a 90,000 m³/yr fuel ethanol plant in Makarie Gbanti, Bombali Shebora and Malal Marah Chiefdoms, to produce ethanol as a biofuel for the European market. The sugar from the plantation will be used to produce ethanol, but the potential to use cassava and additional sugar cane purchased from small scale farmers, and possibly from the regional market is also being considered. The project requires a total area of 15,500ha.

Implementation of the project will have environmental, social and health impacts that have been comprehensively assessed in the ESHIA. The objective of the ESHIA is to give information on the design of the Addax project by finding ways to avoid or minimize the negative impacts and enhance the positive impacts.

Since residents of the above chiefdoms and the surrounding areas will likely be affected by the proposed activity, we believe that you can and need to be given an opportunity to make a contribution to the process of assessing the Addax project and informing its design. Consequently, you/your organization/Ministry are/is invited to take part in a public disclosure and discussion of the ESHIA report on Wednesday, 4th November 2009 at Archbishop Brosnahan Memorial Hall, Santanno House, Howe Street, Freetown at 10 a.m.

We will be grateful if you will attend/send a representative(s) to attend this public disclosure.

Looking forward to your fruitful participation.

Yours faithfully,

Andrew K Keili
MANAGING DIRECTOR

ANNEX 3 - LIST OF PARTICIPANTS

Name/Institution	No	Phone/email	Address
Ministry of Agric Forestry & Food Security	2		
Ministry of Energy and Power	2		
Ministry of Trade and Industry	2		
UNDP	1		
DFID	1		
EU	1		
UN-FAO	1		
World Bank	1		
Campaign for Good Governance	1		
Conservation Society of Sierra Leone	2		
ENFORAC	2		
Law Reform Commission	1		
Network Movement for Justice & Development	1		
National Environmental Protection Agency	2		
National Farmers Association	2		
Sierra Leone Labour Congress	1		
National Revenue Authority	1		
Parliamentary Committee on Agriculture	2		
Parliamentary Committee on the Environment	1		
Right to Food Secretariat	1		State House
Magbass Sugar Cane	1		
Ministry of Finance	1		
Ministry of Lands, Housing Country Planning & Environment	3		
Sierra Leone Association of Non-Governmental Organisations	1		
Law Enforcement Officer (Police)	1		
Lawyers (Addax & Landowners)	2		
Foundation for Environmental Security & Sustainability (FESS)	1		
Ministry of Social, Gender and Children's Affairs	1		

Name/Institution	No	Phone/email	Address
Bombali District Council District Council Chairman	1		
Tonkolili District Council District Council Chairman	1		
Ministry of Health & Sanitation	2		
SALWACO	1		
Action Aid –Sierra Leone	1		
Department of Land and Water Resources	1		
Land & Water Development Division	1		
Environment Foundation for Africa	1		
Sierra Leone Agriculture Research Institute	1		
Sierra Leone Produce Marketing Company	1		
Parliamentarians in the project area	3		
Office of National Security	1		
Department of Agric, Njala University	1		
Dept of Zoology & Botany, Fourah Bay College	1		
Ministry of Local Government	1		
Sierra Leone Chamber of Commerce, Industry & Agriculture	1		
Bumbuna Hydro Electric Power	1		
Paramount Chiefs	3		
Sierra Leone Assoc of Journalists	1		
Press (Radio and TV)	4		
CES	2		
CEMMATS	2		
Addax Bioenergy	4		
TOTAL			

ANNEX 4 - LIST OF VILLAGES BY CHIEFDOM

ADDAX BIOENERGY – ESHIA PUBLIC DISCLOSURE

LIST OF VILLAGES BY CHIEFDOM (PROJECT AREA)

MAKARI GBANTI CHIEFDOM (BOMBALI DISTRICT)

Lungi Acre
Romeneh
Woreh Wanda
Yainkasa
Maronko
Rothun
Rokethar
Royanka
Royeima
Chain Bundu
Taiaima
Matheneh Foday
Makama
Kolisoko
Romampa
Romam man
Matatie
Yeima
Baray Ngen
Mayaimbaray
Mathamba
Punthun
Magbumbu
Kerafay Loko
Makondo
Mabaibana
Mabaibunda
Thomkoba
Mabuya
Magbaikolie
Magbotima
Makoth
Masongbo
Makarie
Gbom Tarawalie
Madina
Woreh Makankary
Woreh Tabai
Rochain Conteh
Makaray
Roketeh
Robana

Mankeneh Bana
Makeh
Karefay Thaimneh
Rolakoh
Fula Town
Rainka
Moreya
Masaprie
Woreh Kaloko
Robana

BOMBALI SHEBORA CHIEFDOM (BOMBALI DISTRICT)

Rothemneh
Matotoka
Rogboro
Makunkabai
Mabunth
Mathamba
Rolunk
Woreh Bana
Masorry
Makeng
Robenkia
Ropotor
Makontho
Mamamudu
Roboli
Manaise
Magbak
Magbithghor
Mabari
Makomp Roron
Madina
Rosait ghin
Rofanka
Robaray
Mabain
Robat
Mamoru
Masatie
Rogbanka
Masuba

**Malal Marah Chiefdom – Tonkolili
District**

Mamaria
Maroki
Manewa
Kontobi
Mataro
Mamileh
Malenka
Magbansaw
Madora
Mayengbe
Matanko
Robis
Rowaka
Makonbie
Masethleh
Rotonka

Mabilafu
Robun
Rosint
Kendema
Mayimbi
Rothongbai
Masheku
Mabansor
Marah
Kaimp Kakolo
Rochain Malal
Mabereh
Mangay
Rogboya
Makunday
Malal
Mayime
Malohun
Magbondo