



commission for environmental impact assessment

Environmental Protection Agency
P.O. Box M-326 (Ministries),
Accra, Ghana
Attn: The Executive Director,
Mr. J.A. Allotey

your reference
-

your letter of
29 February 2004

our reference
054-ab

subject
Advisory review on the EIS for the West
African Gas Pipeline

direct dial
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Utrecht,
26 April 2004

Dear Mr. Allotey,

By letter dated 29 February 2004, you invited the Commission for Environmental Impact Assessment (the Commission) to advise on Review of the draft final Environmental Impact Statement of the West African Gas Pipeline (WAGP). It is my pleasure to submit herewith the advice prepared by a working group of the Commission. I would like to draw your attention to the following points:

During its stay in Ghana the Commission noticed that the West African countries, amongst which Ghana, are increasingly confronted with (mega)-projects and plans at a strategic level in relation to the energy sector. Mention was made for instance of the West African Power Pool. Questions arise like for example:

- at national level: how does the WAGP relate to the energy planning and distribution in Ghana, how can the people of Ghana benefit from WAGP, how are social benefits claimed by the WAGP reflected in the Ghana Poverty Reduction Strategy or can they be integrated? Will the WAGP cause induced development, what kind of foreseeable new developments should be anticipated?
- at sub-regional level: the WAGP will be managed at regional level by a regional authority (the WAGPA). Will this authority be sufficiently equipped to balance the interest of private companies with a majority share versus the interest of the involved countries and to balance the interest between the countries involved? Will environment be sufficiently represented in WAGPA? Have any positions been developed on establishment of an independent Panel of Experts to support WAGPA?
- at regional level: the WAGP could strengthen ECOWAS (as has been claimed by the project proponent. How can this be demonstrated in practice?

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- at international level: the World Bank is currently performing a macro-economics study for the development of the West African Electricity Market. It would have advantages to demonstrate the contribution of the WAGP within the macro-framework. For Ghana this might offer opportunities for the execution of an SEA for the energy sector.

If requested, the Commission is willing to assist in reviewing the supplementary information provided for the final EIS or the final Environmental Management Plan when these become available.

The Commission appreciates to be informed about the use that is made of this advice.

K.J. Beek



Chairman Working Group

West African Gas Pipeline

cc.

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to the attention of Mr. Vermeer and Mr. van der Gaag