

## Summary

The Benin Electric Community (CEB) is committed to the completion of a hydroelectric project in Adjarala. For such a project, an Environmental and Social Impact Assessment (ESIA) procedure must be applied. The Environment Agency of Benin (ABE) and the National Agency for Environmental (ANGE) in Togo have asked the Netherlands Commission for Environmental Assessment (NCEA) for its opinion on the ESIA report.

The NCEA finds that the ESIA is well drawn up and is generally of good quality. However, the NCEA is of the opinion that essential information is missing from the available documents. The NCEA has identified gaps of which the following are the most important:

- The indirect impact of the dam in relation to the integrated management of the Mono's waters have not been clearly identified and management of the cumulative impact of all the dams situated on the Mono river has not been studied;
- A lack of information concerning the safety of the project;
- The flood-risk area for the volume of water behind the dam is not delimited precisely enough, which has significant consequences for the management and implementation of relocation and compensation plans;
- The measures for relocation and compensation have been insufficiently developed and the World Bank's stipulations and recommendations have not been followed in their entirety;
- Based on the analysis set out in the ESIA, it cannot be concluded that the Adjarala project is a profitable investment.

According to the texts in the ESIA, environmental monitoring in Benin and Togo should be based on the design of the project as described in the ESIA – the document submitted for validation. Without filling in the gaps in the ESIA, monitoring by environmental authorities will be difficult and sometimes impossible. In other words, based on the ESIA, the monitoring authorities will be unable to verify that the project is being carried out in accordance with the method on which the ESIA is based. According to the developer, this method follows the directives of the WB, the AfDB and the AFD, and is described in the detailed design, which is not available to the environmental authorities. The monitoring authorities will therefore be unable to verify that this design has been followed in practice, and consequently they will be unable to state whether the ESIA should have been redone in order to reflect any possible changes in project design after the ESIA was submitted for validation.

The ESIA does not convince the NCEA that the CEB is able to implement the Adjarala project as foreseen in this ESIA. There is, above all, a lack of information in the Environmental and Social Management Plan, and in the Relocation Action Plan. The developer, for example, has not described how he has drawn lessons from the experience of the other dam on the Mono River, namely the Nangbéto dam.

The NCEA concludes that, in its current state, the ESIA provides insufficient information for a decision to be made on the final licensing of the certificate of conformity.

The NCEA recommends the development of a full project timetable that includes, in addition to construction works, all tasks relating to the application of the environmental measures foreseen in the ESIA, all gaps identified by the NCEA and, before the works commence, the timeframe for implementing the project's organisational, supervisory and management structures.