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| **Environment:** | **Screening:** The Project has been reviewed against OPIC’s categorical prohibitions and determined to be categorically eligible. Major port projects are screened as Category A because of the potential for significant impacts on marine resources. **Applicable Standards:** OPIC’s environmental due diligence indicates that the Project will have impacts that must be managed in a manner consistent with the following of the International Finance Corporation’s (IFC) 2012 Performance Standards (PS):  
  PS 1: Assessment and Management of Environmental and Social Risks and Impacts;  
  PS 2: Labor and Working Conditions;  
  PS 3: Resource Efficiency and Pollution Prevention;  
  PS 4: Community Health, Safety and Security; and  
  PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources |
In addition to the above standards, the Project will also be required to comply with:

- The IFC’s Environmental, Health, and Safety (EHS) General Guidelines (April 30, 2007);
- The IFC’s EHS Guidelines for Ports, Harbors, and Terminals (April 30, 2007);
- The OSPAR Guidelines for the Management of Dredged Material at Sea (2014); and
- The 2009 IFC/EBRD Workers’ Accommodation Processes and Standards

**Environmental and Social Risks and Mitigation:** Environmental and social issues of concern for the Project include the need for a robust Environmental and Social Management System (ESMS), characterization and disposal of dredged material, water quality, occupational health and safety, emergency preparedness and response, and impacts on marine biodiversity.

*Environmental and Social Management System (ESMS)*

The Insured has prepared an Environmental Sustainability Policy to define the environmental and social objectives and principles that will guide the Project to achieve sound environmental and social performance during both construction and operation.

The Insured has appointed an HSE Manager who will be responsible for the overall management of the environmental, social, and H&S performance during the construction and operational phases of the Project. The EPC Contractor has appointed an HSE Manager as well. The Insured will ensure that all Project staff (including contractors) receive appropriate safety and environmental training, prior to commencement of work.

The Insured has prepared the various environmental and social management plans that are required to adequately manage the E&S risks from the Project. The Insured will also prepare adequate environmental and social management plans for the operational phase of the Project. The Insured will also prepare an adequate Dredging Management Plan for the deepening dredging activities.

*Characterization and Disposal of Dredged Material, and Water Quality*

An inadequate number of sediment samples were taken within the footprint of the dredging area. Therefore, prior to commencing dredging activities, the Project will perform additional sampling of the material to be dredged according to the OSPAR Guidelines. The Project will be required to update the Dredging Management Plan (DMP) to include the results of the additional sampling.

Based on the limited sediment sampling performed to date, the dredged material is likely suitable for disposal at sea. If the results of the additional sampling confirm this, the dredged material will be disposed of at sea at two disposal sites less than 5 km to the south of the Project. If the results of...
additional sampling indicate that any of the material is unsuitable for disposal at sea, the Project will be required to submit an alternative plan as part of the DMP for treatment/disposal of any contaminated dredged material.

Dredging and disposal activities will create an increase in turbidity. The impact has been estimated with numerical modelling of plume dispersion. The impact from turbidity will be limited by moving the disposal location at each cycle, also to distribute sediments evenly. Turbidity will be measured in real-time at four stations around the dredging and disposal areas. If high turbidity levels are observed, the Project will implement measures to reduce the impact.

**Occupational Health and Safety (OHS)**

The Insured has implemented a Health and Safety (H&S) Policy (February 2, 2019) that commits it to have a “zero harm culture”. The Insured has prepared an OHS Plan for the construction phase of the Project. The dredging contractor will include OHS mitigation measures in the updated Dredging Management Plan.

The EPC Contractor plans to construct a workers’ accommodation for the construction expat workers within the existing Port area. OPIC will require that these facilities are constructed in accordance with the 2009 IFC/EBRD Workers’ Accommodation Processes and Standards.

**Emergency Preparedness and Response**

The Project will develop an Emergency Preparedness and Response Plan for the construction phase of the Project. The plan will include an overview of risks and emergency scenarios, emergency preparedness and response procedures, roles and responsibilities, notifications and communications, equipment, and resources.

The Project will prepare an operational-phase Emergency Preparedness and Response Plan prior to beginning operations, and the Dredging Contractor will be required to include adequate emergency preparedness and response measures in the Dredging Management Plan.

Oil spill response measures will be coordinated with the Port of Nouakchott and will follow the Port’s 2015 Operational Plan for the Management of Small Hydrocarbon Spills (PANPA Plan), and the Mauritanian National Marine Pollution Contingency Plan (POLMAR for its French acronym), which arranges responses by spill severity.

**Impacts on Marine Biodiversity**

A Marine Megafauna Observer shall be on permanent duty during day hours to avoid collisions with marine mammals and turtles during dredging.

The Project will carry out a coral mapping survey of the areas to be dredged and the disposal zones to confirm the absence of sensitive habitats. If coral or other sensitive habitats are found in the disposal zone, the DMP will be adapted to avoid impacting these areas, and specific adaptive management and monitoring methods will be put in place. If coral or other sensitive
habitats are found in the area to be dredged, the DMP will include additional mitigation and/or compensation measures in accordance with PS 6.

| Social: | The Project will be required to operate in a manner consistent with the International Finance Corporation’s Performance Standards, OPIC’s Environmental and Social Policy Statement and applicable local laws. OPIC’s statutorily required language concerning the rights of association, organization and collective bargaining, minimum age of employment, prohibition against the use of forced labor, will be supplemented with provisions regarding non-discrimination, hours of work, the timely payment of wages, and hazardous working conditions. Standard and supplemental contract language will be applied to all workers of the Project, including contracted workers.

The Project is taking place within an existing industrial footprint and will not have impacts to land-based or marine livelihoods. The main social risk for the Project is the management of contracted and sub-contracted labor in accordance with the applicable standards. OPIC will require the Fund to use commercially reasonable efforts to prepare a Contractor Management Plan that includes annual audits and a framework for demobilization to ensure the workforce management is in compliance with IFC PS 2.

This review covers the commensurate human rights risks associated with port construction and operations in Mauritania. |