

Reportable EMP Situations

This quarter's total of 16 Environmental Management Plan non-compliance situations is the lowest number recorded since Project construction began in October 2000. However, for the first time, Level III non-compliance situations have been recorded.

Three Level III non-compliance situations involving the Project's management of three archaeological sites along the pipeline route in Cameroon were asserted and recorded by the World Bank Group. The archaeologist advising the World Bank Group contends that the site treatment plans devised and implemented by the Project's archaeological experts were not the best approach for managing these sites. Therefore the Bank asserted that the archaeological investigations undertaken at these sites did not comply with the Environmental Management Plan and represented Level III type non-compliance situations. The Project has developed a go-forward program that is consistent with previous plans, expands the availability of the Project's archaeological findings, and adds capacity-building elements to the Project's existing comprehensive archaeological research program. It is believed that the Project's archaeology program represents one of the most extensive and comprehensive archaeological investigations ever conducted in Central Africa. To date, this program has identified and documented approximately 470 previously undiscovered archaeological sites, a major expansion of the body of scientific information on Cameroonian and Chadian pre-history.

Spills Three Project reportable spills took place on land this quarter and there were no spills into water bodies or in wetland areas.

The Project's Environmental Management Plan requires reporting of all spills into a water body or in a wetland area, regardless of volume. In addition, all spills onto a land surface greater than 150 liters (40 gallons) in volume must be reported.

8 March: Approximately 300 liters of used lubricating oil spilled onto the ground at the Project's construction-phase waste management facility in

Komé. A forklift lost its grip on a drum containing the oil and the drum ruptured when it fell to the ground. The spill was confined to the waste management area and was properly cleaned up. No environmental damage was observed.

7 March: Approximately 340 liters of crude oil spilled onto the ground during a well test at the M55 well site. A valve had been improperly set, causing a component of the test equipment to prematurely fill with crude oil, which then spilled into an open trench that had been excavated in preparation for the installation of a crude oil flow line. The spill was confined to the flow line trench, and most of the crude oil was recovered during the clean up. No environmental damage was observed.

16 February: About 200 liters of diesel fuel spilled onto the ground at the Miandoum gathering station when the loading valve on a refueling truck broke. The leak was immediately plugged. The spill was confined to the laterite paved surface at the gathering station, and about half of the spilled fuel was recovered during the clean up. No environmental damage was observed.

Level III Non-Compliance Situations

Three of the 16 non-compliance situations recorded this quarter were designated as Level III situations, the first ones of this type recorded during nearly two-and-one-half years of construction.

Level III non-compliance situations are defined as critical situations that involve observed damage to a specifically protected sensitive resource or a reasonable expectation of impending damage.

The three situations at issue involve two archaeological sites and one potential archaeological site located along the pipeline right of way in Cameroon. Site treatment plans were developed for each of the three locations in advance of excavations performed by the Project's team of Cameroonian, European, and North American archaeological experts. Comprehensive archaeological studies were conducted at each location in accordance with internationally accepted procedures. Discovered artifacts (generally fragments of ceramic pots, charcoal, iron smelting slag, and some stone tools or tool making fragments) were collected and preserved, carbon dating samples were collected for analysis, precision site maps were created, and detailed reports were compiled on the findings. The External Compliance Monitoring Group (ECMG) ultimately determined that one of the sites was a natural rock formation and not an archaeological site.

The ECMG holds the view that the pipeline route should have been adjusted to avoid the sites in two instances, and in the other situation, the

ECMG contends that the right of way should have been narrowed to avoid the site. As a result, the sites would have been left undisturbed and would not have been excavated and investigated.

In the opinion of the Project's professional archaeological team, the best option was to take advantage of the opportunity to fully investigate the sites now, when funding and logistical support are available for the work. In adopting this approach, the Project's experts were mindful of the very limited funding historically available for archaeological investigations in Cameroon and, consequently, the probability that important discovered sites might languish for some time before being investigated, or that they might never be investigated at all.

This opportunistic "investigate now" approach was adopted with substantial participation of the Cameroonian archaeology community. The Project's development of site treatment plans was guided by discussions with representatives of the Cameroonian Ministry of Culture. For example, a representative of the Ministry visited one of the sites at issue (ECA 068) during the excavation, where he concurred with the implementation of the site treatment plan. In addition, seven Cameroonian archaeologists have served as members of the Project's archaeological team that developed and implemented the site treatment plans.

During a series of site visits in March, the Project's archaeological team met at each of the three sites at issue with the ECMG's archaeological consultant, along with representatives of the World Bank Group and the Project's Environmental Management Plan Group. Ultimately, the World Bank Group adopted the opinion of the ECMG's consultant and exercised its right to assert that the Project's management of these three archaeological sites constitutes Level III non-compliance situations.

The ECMG issued a report following the site visits. In the report, the ECMG indicated that, although it believes the Project's management of the three sites did not comply with the EMP's Cultural Resources Management Plan, "the information loss does not appear to be irreversible." The ECMG also noted in its report that "remedial actions can be taken that would replace, in large measure, the information loss" that it contends occurred at the two actual archaeological sites.

The ECMG report also stated that "it is important to note that more than 300 individual archaeological sites were identified in Cameroon and more than 50 of them appear to be important." (The Project's archaeology program appears to be one of the most extensive archaeological investigations ever conducted in Central Africa. In total, including the

investigations carried out in Chad, the latest tally by the Project's archaeologists shows that they have identified and documented approximately 470 sites. This more refined number reflects an adjustment from earlier reported estimates of the total number of sites.)

For more background on each of the archaeological sites at issue and details regarding the Project's go-forward archaeology program, please see the section on *Archaeology & Cultural Resources*.

In accordance with the Project's commitments to transparency and compliance with the Environmental Management Plan, the three Level III non-compliance situations asserted and recorded by the World Bank Group have been described in this Quarterly Report, and are included in the statistical summaries at the end of this section.

Level II Non-Compliance Situations

Two of the 16 non-compliance situations recorded this quarter were classified as Level II situations. Both of these Level II non-compliances had been rectified by the end of the quarter.

Level II non-compliance situations are defined as situations that have not yet resulted in clearly identified damage or irreversible impact to a sensitive or important resource, but require expeditious corrective action and site-specific attention to prevent such effects.

9 January: A crew performing reclamation work on the pipeline easement inadvertently filled in an excavation site near Nanga Eboko that had been marked for further archaeological work. Project archaeologists had already performed initial investigations at the site but had to leave to visit another location before completing their work. When the archaeology team returned, it found the excavation had been filled in, but they were able to re-excavate the site and finish their work. No damage to archaeological artifacts resulted from the inadvertent reclamation activity. The construction supervisor who had been in charge of the reclamation work was reminded of the need to strictly adhere to the Project's archaeological procedures. A refresher training session focusing on the Project's archaeological requirements was also organized for all pipeline construction contractor reclamation supervisors and foremen.

28 January: The pipeline construction contractor posted a hiring notice at the gate of the Gadjibian construction camp in southern Chad seeking to rehire workers who had previously been temporarily employed by the contractor as carpenters, masons, and metal workers. No actual hiring took place as a result of this incident. Nevertheless, the Project's Environmental Management Plan strictly prohibits any attempts to hire at the gate or a

work site. The hiring notice was removed immediately and contractor management was instructed to strictly adhere to their Socioeconomic Action Plan.

Non-Compliance Situations & Compliance Initiatives Tally

◀ **Total Reportable Situations by Country**
1st Quarter 2003

	<i>Level I</i>	<i>Level II</i>	<i>Level III</i>	<i>Total Non-Compliance Situations</i>	<i>Compliance Initiatives</i>	<i>Reportable Spills</i>
Chad	7	1	0	8	1	3
Cameroon	4	1	3*	8	6	0
Total	11	2	3*	16	7	3

◀ **Non-Compliance Situations by Major Contractor**
1st Quarter 2003

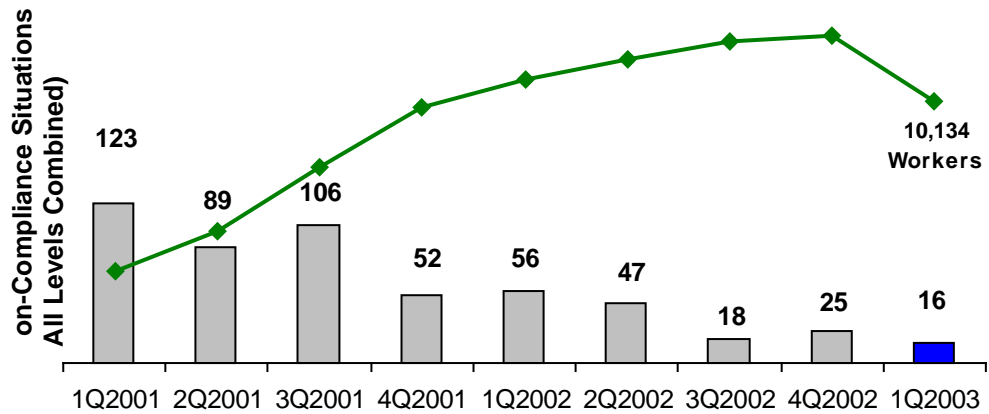
	<i>Level I</i>	<i>Level II</i>	<i>Level III</i>	<i>Total</i>
Wilbros Spie Capag	3	2	0	5
TCC	6	0	0	6
Doba Logistics	0	0	0	0
Sogea-Satom	0	0	0	0
EEPCI	1	0	0	1
COTCO	1	0	3*	4
Pride Forasol	0	0	0	0
Schlumberger	0	0	0	0
Modec	0	0	0	0
David Terrassement	0	0	0	0

◀ **Non-Compliance Situations by Category**
1st Quarter 2003

	<i>Level I</i>	<i>Level II</i>	<i>Level III</i>	<i>Total</i>
Work outside approved areas	3	0	0	3
Socioeconomic issues	1	1	0	2
Storage of oily materials	2	0	0	2
Use of unauthorized materials	2	0	0	2
Archeological issues	1	1	3*	5
Effluent discharges	1	0	0	1
Water crossings	1	0	0	1
Total	11	2	3*	16

* Asserted and recorded the World Bank Group

◀ **1st Quarter 2003 Non-Compliance Situations (Total of All Levels) Compared to Construction Activity (Total Workers on the Job)**



◀ **2002 Reportable Spills Compared to Construction Activity (Total Workers on the Job)**

