



Environmental and Social Review Summary

Destination Inspection Scanning

This Environmental and Social Review Summary (ESRS) is prepared by MIGA staff and disclosed in advance of the MIGA Board consideration of the proposed issuance of a Contract of Guarantee. Its purpose is to enhance the transparency of MIGA's activities. This document should not be construed as presuming the outcome of the decision by the MIGA Board of Directors. Board dates are estimates only.

Any documentation which is attached to this ESRS has been prepared by the project sponsor, and authorization has been given for public release. MIGA has reviewed the attached documentation as provided by the applicant, and considers it of adequate quality to be released to the public, but does not endorse the content.

Country:	Gabon
Sector:	Services
Project Enterprise:	Société de Scanning du Gabon S.A.
Environmental Category:	B
Date ESRS Disclosed:	April 26, 2013
Status:	Due Diligence

A. Project Description

Cotecna Inspection S.A. of Switzerland (COINS) seeks a MIGA guarantee for its investment in the Société de Scanning du Gabon S.A. The project consists of a six-year build-operate-transfer (BOT) contract to provide a number of services to the Government of Gabon (GoG). These services are namely installation and operation of non-intrusive import inspection equipment, including two (2) state-of-the-art high-energy mobile x-ray scanners at the ports of Libreville-Owendo and Port Gentil; as well as maintenance and technical assistance to the operation; delivery of training to the GoG; and transfer of the scanners to the GoG (at the end of the six-year contract).

This BOT contract is initially limited to the procurement, installation, operation and maintenance of the two scanners in the seaports mentioned above. In addition, COINS will use its Computerized Risk Management System (CRMS) which analyzes data on trade transactions to assign the correct level of intervention allowing for more efficient inspections.

MIGA has issued guarantees to five (5) other Cotecna projects in the Republic of Congo, Niger, Nigeria, Senegal and Togo.

B. Environmental and Social Categorization

The project is a Category B according to MIGA's Policy on Social and Environmental Sustainability. The key environmental and social risks pertain to Environmental Health and Safety (EHS) and Occupational Health and Safety (OHS), such as safe operation of



equipment, radiation exposure and site security. The project site will be on two existing maritime ports. The scanners will be installed in a dedicated access controlled customs area within the ports, which has restricted access from the public. There are no significant social and environmental adverse impacts directly resulting from this project.

C. Applicable Standards

While all Performance Standards (PS) are applicable to this investment, based on current information submitted and reviewed, it is expected that the investment will have impacts which must be managed in a manner consistent with the following Performance Standards:

- PS1: Social and Environmental Assessment and Management Systems
- PS2: Labor and Working Conditions
- PS3: Pollution Prevention and Abatement
- PS4: Community Health, Safety and Security

PS 5 (Land Acquisition and Involuntary Resettlement), PS 6 (Biodiversity Conservation and Sustainable Natural Resource Management), PS 7 (Indigenous Peoples) and PS 8 (Cultural Heritage) are not applicable for the project as the scanners will be installed within the existing boundary of the maritime ports.

D. Key Documents and Scope of MIGA Review

The documents reviewed by MIGA:

- Environmental and Social Document: Human Resources, Health and Safety, Training and Audit, prepared by Cotecna for the Société de Scanning du Gabon S.A. (February 2013)
- Health and Safety Plans and Procedures prepared by Cotecna (e.g., Fire Protection Procedure - *Procédure Incendie*, 2007; Instruction for Radioactive Material Detection, 2010; Radioprotection Safety – *Procédure Sécurité et Radioprotection*, 2012)
- Société de Scanning du Gabon S.A., Business Case, prepared by Cotecna February 2013
- 2011 Annual Activity Report: Cotecna, prepared by COINS
- Definitive Application for a MIGA Guarantee

MIGA's review of this project also included correspondence comprising of environmental and social information submitted by Cotecna.



E. Key Issues and Mitigation

PS 1: Social and Environmental Assessment and Management Systems

Cotecna will develop plans which will address social and environmental management systems aimed at ensuring that the proposed project, will upon implementation of specific measures, comply with the environmental and social requirements and regulations of Gabon, MIGA's PS and relevant World Bank Group Environmental, Health and Safety (EHS) guidelines.

Social and Environmental Assessment: Cotecna provided an Environmental and Social Document which had information on their approach on Social and Environmental Management in the areas of Human Resources, Health and Safety in the form of Instructions for Radioactive Material Detection, which outlines procedures for radiation protection and a summary of proposed Training for the Gabon project.

Management Program: Société de Scanning du Gabon S.A will develop an Environmental and Social Management Plan (ESMP), health and safety plans such as Cotecna Safety and Radioprotection Procedures (*Procédure Sécurité et Radioprotection*), Cotecna Gabon Fire Safety Procedures (*Procédure Incendie*); and Human Resources Procedures (*Procédure Ressources Humaines*). A fire safety procedure will be implemented which will include dial in emergency numbers, signage and fire extinguishers. As part of Cotecna Gabon's training program, training is scheduled for first aid and fire safety and a partnership with the Fire Department of Gabon has also been established to enhance the quality of its training program. These plans and procedures aim to address potential environmental, health, safety, training and monitoring needs of the project.

Organizational Capacity and Training: Cotecna has demonstrated satisfactory capacity in other MIGA-supported projects to implement appropriate safety measures, training, and auditing procedures. Cotecna Gabon has committed to provide a team of qualified international experts for training and skills transfer to staff to ensure organizational capacity and knowledge in its operations in Gabon.

Monitoring and Reporting: A Quality Management System (QMS) will be put in place to monitor quality assurance, as for all other Cotecna projects. Regular and frequent audits of all sites to verify compliance with all procedures, including safety procedures will be undertaken. The project does not need to develop impact assessments; however, appropriate mitigation and monitoring measures are required. Cotecna Gabon will develop an ESMP and health and safety plans and procedures, including monitoring.



PS 2: Labor and Working Conditions

Cotecna applies its Human Resources rules and practices across its international operations following international standards set forth by the International Labor Organization (ILO) and MIGA's Performance Standard 2 on Labor and Working Conditions. Cotecna Gabon is in the process of establishing a Human Resources Procedures (*Procédure Ressources Humaines*) which will conform to Gabon's Labor Code (Code du travail du Gabon, Loi n°3/94 21 November 1994) and MIGA's PS 2. This manual will outline the minimum work age, recruitment, terms of employment, and several working conditions such as the legal working time, overtime pay, protection of women's health including maternal leave, weekly rest period and annual paid leave.

The project will employ about 30 staff during the construction phase of the project and 50 people will be employed during the operations phase of the project. Employment of Gabonese nationals will be a priority at all levels. The project will apply an equal opportunity and non-discriminatory work environment and has aimed to have approximately 30% of its workforce to be female. Annual salaries will be above the national average.

The key health issue associated with scanner technology is radiological safety. Cotecna warrants that the project's design will incorporate all required safety monitoring, training and auditing procedures. Cotecna warrants that the scanners' proposed Radiological Safety System - consisting of a high-reliability, fail-safe, logic controller and associated safety sensors - autonomously guarantees safety in and around the scanners, so that the installations are completely safe for its operators, drivers, and those working in the vicinity. Moreover, Cotecna has indicated that there are no permanent radioactive sources in the scanner, thus there is no risk of radiation hazard when the scanner is not in use. The operation of the scanners is continuously controlled and monitored by a System Operator and marshaling staff through Closed-circuit television (CCTV) and direct supervision. The maintenance of the scanners is ensured under the direct control of the manufacturer. The scanners which will be used in this project are widely used worldwide. The scanners fully comply in particular with the World Health Organization (WHO) and the International Commission on Radiological Protection's (ICRP) regulations and recommendations.

The project requires training of local staff in the handling and safe operation of the equipment. As part of the Personal Protective Equipment (PPE) and conditions Cotecna and Customs Agents working in the scanning facility are equipped with individual dosimeters (radiological films) to measure personal exposure to radiation. Dosimeters are analyzed and replaced every three months according to the standards based on the ICRP. The radiometers in the scanning equipment are calibrated yearly. A joint employer-employee occupational health and safety committee will be established to monitor health and safety conditions of the project.



PS 3: Pollution Prevention and Abatement

Pollution prevention and abatement can be done through proper housekeeping, segregating flammables (e.g., small quantities of diesel if stored at the site) appropriately, and ensuring waste and recycling collection is regularly carried out by third parties. Cotecna's environmental and social management plan will address storage and disposal practices, including that dosimeters are disposed of by a certified laboratory. Radioactive pollution is considered to be minimal as there are no permanent radioactive sources in the scanner.

PS 4: Community Health, Safety & Security

Security Arrangements: In cooperation with public security services, Cotecna will engage private, unarmed security guards to secure its offices and scanner sites. Cotecna will manage its private security in accordance with PS4 as well as local laws and professional standards. Cotecna will employ marshaling staff to safely and efficiently manage traffic movements in the pre-scanning and scanning areas, and in the truck parks. Fencing will be used as a security/safety measure at the site.

F. Environmental Permitting Process and Community Engagement

Given that the project involves small physical installations within secure customs areas at maritime ports, environmental permitting and community consultation/engagement are not required for this project. The ports themselves are subject to International Ship and Port Facility Security regulations.

G. Availability of Documentation

There are no attachments for this ESRS document.