



Environmental and Social Review Summary

Azura Power West Africa Limited

This Environmental and Social Review Summary (ESRS) is prepared by MIGA staff and disclosed prior to the date on which MIGA's Board of Directors considers 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 MIGA's Board of Directors. Board dates are estimates only.

Any documentation that 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: | Nigeria |
| Sector: | Power |
| Guarantee Holder | (i) Azura-Edo Ltd and (ii) yet to be identified lenders |
| Project Enterprise: | Azura Power West Africa Limited |
| Environmental Category: | A |
| Date ESRS Disclosed: | November 28, 2012 |
| Status: | Due Diligence |

A. Project Description

Azura Power West Africa Limited ("Azura"), a subsidiary of Amaya Capital Limited ("Amaya"), is proposing the construction of the Azura-Edo Independent Power Plant ("IPP") in Edo State, Nigeria. The project will consist of a 450 MW (net) open cycle gas turbine ("OCGT") power plant covering approximately 12.5ha of a 102ha site. The OCGT plant will be constructed to allow for future possible conversion to a combined cycle gas turbine ("CCGT") plant, if and when such a conversion is deemed economically viable. There are two additional components to the project: an above ground 300kV transmission line (less than 1 km), with one pylon, connecting the project site to the Benin North substation (adjacent to the project site); and an underground gas pipeline spur of approximately 1km in length connecting the power plant to the Escravos Lagos Pipeline System ("ELPS"). The World Bank is involved in the restructuring of the energy sector in Nigeria, and is expected to have a role in this project through the partial risk guarantee ("PRG") scheme being proposed. Azura is one of 14 IPPs nominated by the Nigerian Federal Ministry of Finance for participation in the proposed PRG series.

The proposed site for the project is located in the north-eastern outskirts of Benin City, Edo State. The project site is adjacent to the Ihovbor Power Plant which is currently under construction under the auspices of the National Integrated Power Project (NIPP).

Power Plant - The OCGT plant has been designed to accommodate the potential conversion to Closed Cycle Gas Turbine (CCGT) with a total net output of approximately 670 MW. The CCGT will form an extension adjacent to the OCGT facilities with Heat Recovery Steam Generators (HRSG) installed next to each gas turbine. The OCGT Power Plant consists of a gas turbine and a

generator. The gas turbine comprises a compressor, combustion system and a power turbine. The Azura-Edo IPP will be constructed around Frame E gas turbine generators, operating in open cycle with a tendered capacity of around 450 MW.

Transmission Line - The OCGT power station will have four transformers to step up the voltage from 15 kV to the transmission voltage of 330 kV from where it is likely to be fed over a short length of overhead cable to an air-insulated switchyard before being exported via overhead cables on a single tower to the new substation at Benin North, located adjacent to the Project site.

Gas Pipeline Spur - The Project site is located less than 1 km from the ELPS, the country's main natural gas trunkline. Natural gas will be delivered to the plant via the ELPS and a circa 1 km spur line from the ELPS to a gas receiving station on the plant site. This spur will share the same right of way used by the spur that connects the ELPS to the adjacent NIPP power plant.

B. Environmental and Social Categorization

The main environmental and social issues relate to air quality (dust during construction and decommissioning and greenhouse gases during operations), noise, waste water, solid waste, biodiversity, physical resettlement, economic resettlement and worker health and safety impacts. The Project is one component of a larger World Bank lending program to Nigeria, the Power Sector Guarantees Project (PSGP) that will support the establishment of up to 14 IPPs. At this point the World Bank has categorized PSGP as a Category "A" project because it will support multiple power plants, and MIGA will maintain consistency with the World Bank's categorization even though it is supporting only one of the IPPs. The Azura project will have environmental and social impacts that can be managed using existing project design, or through readily available mitigation measures as defined in the management plans to be applied to the project.

C. Applicable Standards

While all Performance Standards are applicable to this investment, based on our current information indicates 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 & Security
- PS5: Land Acquisition & Involuntary Resettlement
- PS6: Biodiversity Conservation & Sustainable Natural Resource Management
- PS8: Cultural Heritage

The project site is located on the outskirts of Benin City; based on current information PS7 does not apply. World Bank Group (WBG) General Environmental, Health and Safety (EHS) Guidelines and EHS Guidelines for Thermal Power Plants apply to this project.

D. Key Documents and Scope of MIGA Review

The following documents were reviewed by MIGA:

- *Azura-Edo Independent Power Project Environmental Impact Assessment*, February 2012, ERM
- *Annex A: Draft Azura Edo EIA and RAP Stakeholder Engagement Plan*, December 2011, ERM
- *Resettlement Action Plan (RAP) for the Azura-Edo Independent Power Plant*, February 2012, ERM

A World Bank team comprising environmental and social specialists visited the project site in June 2011 and February 2012. The draft project EIA and RAP were disclosed by the World Bank in March 2012. MIGA links its E&S due diligence with the World Bank's and has liaised with its E&S specialists.

E. Key Issues and Mitigation

PS1: Social and Environmental Assessment and Management Systems

Social and Environmental Assessment:

The environmental and social management arrangements for the PSGP call for an Environmental Impact Assessment (EIA) and, when required, a Resettlement Action Plan (RAP) to be prepared and disclosed for each IPP prior to submission for the World Bank's PRG package for approval. Additionally, it is expected that a Sectoral Environmental Assessment (SEA) will be prepared by the Power Sector Guarantees Project (PSGP) with World Bank support to examine environmental and social issues as well as impacts associated with the power sector. The SEA will evaluate and compare the impacts against those of alternative options, assess legal and institutional aspects relevant to the issues and impacts; and recommends broad measures to strengthen environmental management in the sector. The SEA will pay particular attention to potential cumulative impacts of multiple activities in the sector.

A draft EIA (February 2012), a RAP (February 2012) and a draft Stakeholder Engagement Plan were prepared for the proposed Azura-Edo IPP. The EIA was undertaken in accordance with the Environmental Impact Assessment Act (Act No. 86 of 1992), Equator Principles, World Bank requirements, World Bank Group (WBG) General Environmental, Health and Safety (EHS) Guidelines and EHS Guidelines for Thermal Power Plants and is in compliance with MIGA's Performance Standards. The RAP was prepared in accordance with Nigerian law, WB OP 4.12 and IFC's 2012 PSs.

The EIA provides details of the impact assessment, stakeholder consultation process and outcomes, management plans and reporting and disclosure modalities. In support of the impact assessment noise and air emissions modeling were also undertaken. Impact assessment methodologies for these impacts (dust, NO₂, greenhouse gases and noise) were developed using US EPA limits, IFC guidelines and WHO noise limits.

Management Program and Monitoring:

The EIA identified a range of mitigation measures, management actions and monitoring requirements to be implemented during the project. An Environmental Management Plan (EMP) has been developed to be applied by the company during construction and operations phases. In accordance with EIA requirements, the Federal Ministry of Environment (FMEnv) disclosed the EIA report to the public for review and comment and has since approved (final approval) the report after having scheduled a technical review by appointed experts. This took place in Benin City on the 2nd and 3rd of July 2012 and was attended by a representative from the World Bank office in Abuja.

The EMP contains the recommendation for the development of a number of detailed management plans and procedures that lay out the specifications for compliance with specific environmental and social elements. Key plans are listed below.

- Construction Management Plan;
- Traffic Control Management Plan;
- Waste Management Plan;
- Site Closure and Restoration Plan;
- Influx Management Plan;
- Employment and Workforce Policy;
- Comprehensive Community Investment Plan;
- Local Employment and Procurement Policy;
- Local Employment Strategy;
- Occupational Health and Safety Policy;
- Spill Response Plan; and
- Emergency Response Plan.

Organizational Capacity and Training:

Azura Power is committed to provide resources essential to the implementation and control of the ESMP. Resources include the appropriate human resources and specialized skills. Azura Power will have dedicated personnel competent on the basis of appropriate education, training, and experience that will manage and oversee the EHS aspects of project construction and operations.

Azura Power will manage key contractors to ensure that the EMP is implemented and monitored through contractual mechanisms and day-to-day management where required. Azura Power will have its own supervisory personnel and the Nigerian Government will oversee the project through its various agencies.

Azura Power will identify, plan, monitor, and record training needs for personnel whose work may have a significant adverse impact upon the environment or social conditions. The project recognizes that it is important that employees at each relevant function and level are aware of the Project's environmental and social policy; potential impacts of their activities; and roles and responsibilities in achieving conformance with the policy and procedures. This will be achieved through a formal training process. Employee training will include awareness and competency with respect to environmental and social management.

Azura Power will control EHS documentation, including management plans; associated procedures; and checklists, forms and reports, through a formal procedure. All records will be

kept on site and will be backed up at several offsite locations (including secure cloud storage facilities). Records will be kept in both hard copy and soft copy formats. And all records will be archived for the life of the project. The EHS Coordinator is responsible for maintaining a master list of applicable EHS documents and making sure that this list is communicated to the appropriate parties. The subcontractors will be required to develop a system for maintaining and controlling its own EHS documentation and describe these systems in their respective EHS plans.

Cumulative impacts were assessed for each of the impacts identified as the results assuming implementation of mitigation measures. The cumulative noise impacts are considered to be major prior to mitigation, but are considered insignificant after the implementation of further design iterations and modeling prior to operation, monitoring and construction of barriers if necessary. The cumulative impact on biodiversity was assessed to be moderate negative due to the presence of a number of vulnerable species. Cumulative impacts on soils and geology, water resources (contamination), cultural institutions and infrastructure were found to be minor negative, while cumulative impacts on air quality, water resources (availability of water) and workplace H&S were considered negligible. The cumulative impacts on physical and economic resettlement and the demographic profile were considered to be minor – moderate due to existing influx from the construction of the neighboring NIPP facility as well as current disputes in the communities regarding compensation and NIPP project benefits. The positive cumulative impact of the Project was assessed to be moderate.

PS2: Labor and Working Conditions

Azura Power has developed an Employment and Workforce Management Plan, which complies with PS2. As defined in the Plan, the Contractor is required to develop and implement a plan for the management of workers that complies with Nigerian law and this Performance Standard. The guiding principles as defined in the Plan include, adherence to international standards, a commitment to transparency and non-discrimination and equality, optimization of local content and a commitment to health and safety. The Occupational Health and Safety (OHS) plan within the EMP provides the overarching framework for OHS management during construction. Submission of documentation confirming compliance with the Employment and Workforce Management Plan and OHS Plan will be a requirement.

Approximately 500 people will be employed during the construction phase and up to 70 percent of the construction workers can be sourced locally, from within 30 km of the site. Approximately 50 permanent site employees will be employed during the operational phase, including plant management staff, maintenance staff, skilled technicians, drivers, cleaning staff and a number of semi-skilled operators.

A temporary construction camp will be constructed on the north western portion of the Project site. The exact nature of the accommodation will be determined in discussion with the EPC contractor but will likely include accommodation, cooking and sanitary facilities for construction workers, laydown areas and vehicle parking areas. The construction camp will be fenced and access will be controlled and restricted to employees. Policies for the management of this camp and the construction workforce are yet to be developed.

Azura Power will prepare plans and procedures to identify the potential for, and response to, environmental accidents and health and safety emergency situations and for preventing and mitigating potentially adverse environmental and social impacts that may be associated with

them. Emergency preparedness and response will be reviewed by Azura Power on at least an annual basis and after the occurrence of any accidents or emergency situations to ensure that lessons learnt inform continuous improvement. Emergency exercises will be undertaken on a regular basis to confirm adequacy of response strategies. Investigations of accidents or incidents will follow formal documented procedures.

Construction phase: Given that the negative impacts on workplace health and safety, including the potential for accidents in the workplace, and contracting infectious diseases, is proposed to be of high significance, several mitigation measures have been identified:

- registration with the nearby health care facilities including the Primary Health Care Facility (PHC) in Orior-Osemwende community which will ensure that any accidents that occur in the workplace will be addressed immediately,
- encourage the construction workforce to undergo testing (Azura Power and contractors) for sexually transmitted infections (STIs),
- health awareness program incorporating an HIV/AIDS awareness and prevention program, worker induction will include detailed H&S training,
- targeted H&S training program,
- first aid training for key staff,
- appropriate warning signage,
- use Personal Protective Equipment (PPE),
- contractors will be required (through contractual requirements) to abide by Azura Power's H&S requirements,
- Azura Power will liaise with the Edo State Government's Ministry of Employment, Labour and Productivity to report any health and safety incidents as a legal requirement,
- Azura Power should conduct a Risk Assessment for the laying of the pipeline and operation of the power plant to understand the explosion risks and contours,
- Site clearance and construction techniques should be planned to minimize the amount of standing water on site, and
- Health, Safety and Environmental (HSE) officer of the selected construction company will be responsible for the health and safety aspects of the construction activities.

Operations phase: recommended mitigation measures for operation impacts to workplace health and safety are similar to the mitigation measures recommendations for construction. Focus should be paid to maintaining the standards and procedures implemented during construction. The mitigation measures outlined above will be similar but may be amended to reflect the nature of activities during operation. The HSE officer of the operating company will assume responsibility for all health and safety aspects during operation.

PS3: Pollution Prevention and Abatement

Air emissions - the key point sources of emissions from the power plant will originate from the four gas turbine stacks, and the black start diesel engine stacks and will include approximately 20 ppm NO_x, 30 ppm SO_x and trace amounts of H₂S. Approximately 2,178,000 tonnes of carbon dioxide (CO₂) is expected to be released per annum as a result of the operation of the power station. Construction related impacts to air quality resulting from site traffic and site vehicle emissions were considered minor. A construction management plan and traffic management plan have been developed to minimize and control PM₁₀ and NO₂/NO_x and dust emissions.

During operations the negative air quality impacts relate to process emissions (NO_x and CO), cumulative process emissions (NO_x and CO), and greenhouse gases. The negative impacts on human health from emissions of NO_x and CO arise from the combustion of fuel in the power plant. The impacts of emissions arising from the operation of the power plant have been quantified using EU, WHO, and Nigerian emissions limits. The assessment indicates that the emissions from the project will result in minor adverse impact on air quality as a result of emissions from NO₂ and CO. The proposed facility will contribute to greenhouse gases through the emission of fossil fuel derived from carbon dioxide (CO₂) to the atmosphere. The main source of CO₂ emissions during operation is the combustion of natural gas. A total of CO₂ emissions of 2,718 kt/yr was calculated. PS3 does not set a maximum permissible level of GHG emissions but it does set a 100t/year threshold above which reporting requirements are triggered. Consequently, the project commits annual quantification of direct emissions as well as indirect emissions associated with the off-site production of energy used by the project in accordance with the methodologies provided by the Intergovernmental Panel on Climate Change and other relevant and internationally recognized organizations.

Noise emissions will result from a variety of sources including the gas turbines during operation and mobile machinery and plant during construction and decommissioning. The gas turbines, however, will be built in a noise reducing enclosure, with the outside target noise reaching a maximum of 85 dBA. The results of noise modeling indicate that operational noise levels from the proposed plant will remain below the World Bank Group EHS Guideline Noise levels, both during the day and night at all receptors.

Both oily water and chemical waste water effluents will be generated by the power plant operations, from pressure filters, regeneration effluent from the demineralisation plant as well as other chemical laboratory wastes and battery waste water and gas turbine compressor wash water. Sludge will also be generated from the waste water treatment process. All effluent will be collected and treated, and then collected in a central waste water monitoring basin. Effluent will be pumped and discharged from this collection basin once the water meets the Nigerian and World Bank discharge criteria for discharge of effluent. The final discharge of effluent, after passing through the oil/water separator will be discharged via the plant effluent drainage system to a small stream located approximately 800 m from the Project site.

Non-contaminated water will be routed into a storm water system and discharged to the surrounding area as per Nigerian and World Bank requirements. Domestic sanitary waste will be treated in a small package sewerage treatment plant.

All solid wastes generated during construction (surplus spoil) and operation (waste chemicals, office waste and small amounts of hazardous waste) will be disposed of appropriately. Azura Power will identify appropriate landfill sites during the detailed design phase.

PS4: Community Health, Safety & Security

The project site is located to the north-east of Benin City, adjacent to the Ihovbor Power Plant, just outside the limits of the built up area and within the Benin bypass road. Two communities will be resettled, discussed below. Once the resettlement is complete, the new resettlement community and the community of Ihovbor-Evboeka will be the two closest human settlements to the project site, at approximately 1km and 4km distance away, respectively.

Azura Power will maintain a formal procedure for communications with the regulatory authorities and communities. The EHS Coordinator is responsible for communication of EHS issues to and from regulatory authorities whenever required. Meetings will be held, as required, between Azura Power and the appropriate regulatory agency and community representatives to review EHS performance, areas of concern and emerging issues. Dealings will be transparent and stakeholders will have access to personnel and information to address concerns raised.

The CLO will be responsible for disseminating information and coordinating community communications through the course of the Project. The Project will develop and implement a grievance mechanism whereby community members can raise any issues of concern. Grievances may be verbal or written and are usually either specific claims for damages/injury or complaints or suggestions about the way that the Project is being implemented. When a grievance has been brought to the attention of the Project team, and more specifically the GO, it will be logged and evaluated. The person or group with the grievance is required to present grounds for making a complaint or claiming loss so that a proper and informed evaluation can be made.

Where a complaint or claim is considered to be valid, then steps are required to be undertaken to rectify the issue or agree compensation for the loss. In all cases the decision made and the reason for the decision will be communicated to the relevant stakeholders and recorded. Where there remains disagreement on the outcome then an arbitration procedure may be required to be overseen by a third party (eg government official). Local community stakeholders will be informed on how to implement the grievance procedures.

Security Arrangements:

Azura Power will work with private contractors and the State Government to provide both armed and unarmed security for the site. Government-provided security will include military police and the Nigerian Army where necessary. Azura Power will exercise diligence in ensuring that both public and private security personnel are properly trained and have been subject to background checks.

PS5: Land Acquisition & Involuntary Resettlement

Under its current design the project will require resettlement affecting two communities: Orior-Osemwende and Idunmwowina-Urho-Nisen, both of which are located in Omagbae South Ward Six, of the Uhumwonde Local Government Area (“LGA”) in Edo State. Minimization of resettlement was taken into account in the analysis of alternative project sites. Orior-Osemwende and Idunmwowina-Urho-Nisen are situated just outside of the built up area of Benin City, within the by-pass road. There is significant mobility and interaction between the communities and the rest of Benin City, and the communities could be thought of as being on the cusp between peri-urban and rural. A sizeable number of people originally from these communities live in Benin City and maintain close ties with the communities, visiting often. Agriculture is a prevalent livelihood activity in these communities, with approximately 63 percent of households relying on agriculture for some part of household income, and 27 percent of households having agriculture as the primary source of income. Agricultural activities for these communities include crop cultivation, forestry, and livestock rearing.

MIGA has received a Resettlement Action Plan (RAP) covering Orior-Osemwende and Idunmwowina-Urho-Nisen, from which the information in this section has been obtained. In

Orior-Osemwende there will be impacts on the following, with some overlap between these groups: loss of residential housing for 34 households; loss of agricultural land and/or crops for 332 individuals; impact on one business structure; and impacts on 350 owners of other physical assets. Impacts in Idunmwowina-Urho-Nisen are anticipated to consist of, with some overlap: loss of residential housing for 12 households; loss of agricultural land and/or crops for 71 individuals; impacts on 12 business structures; and impacts on 114 owners of other physical assets. Identification of impacts on hired employees in both communities is pending. In each community there will be impacts on a small number of community assets, including shrines, churches, a community health center, a traditional medical center, and a borehole. A Physical Cultural Resources Plan will be developed. An outline of this plan is provided in Annex C of the RAP.

The RAP, which is disclosed along with this ESRS, describes the resettlement and compensation processes in detail, as well as the consultation carried out for the RAP. The RAP uses the World Bank's OP 4.12 (Involuntary Resettlement) and PS5 as its benchmarks. The Edo State Government has primary responsibility for carrying out resettlement, and formally published its revocation of rights in the land in different venues in June 2011, with the RAP cut-off date set as August 29, 2011. Legally speaking, affected parties must register claims with the government following the revocation of rights; however a census was carried out for the RAP as required by PS5. During consultations for the RAP, agricultural land users expressed a strong preference for cash compensation as opposed to in-kind compensation. Therefore the focus will be on providing sufficient amounts of compensation to enable purchase of agricultural land at least equivalent to the land lost, including the costs of preparing the new land for agricultural use. Loss of non-agricultural livelihoods will also be addressed. Two resettlement sites have been proposed and analyzed, and consultations have been carried out with the host community of one site (the other is unoccupied). Project-affected people will be able to use their compensation to purchase land in one of the new sites, or in another site of their choosing. At this time, the process for making agreements with individual households is ongoing, following the execution of the Certificate of Occupancy in June 2012. The institutional arrangements for the resettlement are provided in the RAP and include a grievance mechanism and monitoring.

PS6: Biodiversity Conservation & Sustainable Natural Resource Management

The Project area and the surrounds have largely been modified by infrastructure projects such as the neighboring NIPP plant. The selected location for the Project is located on degraded and re-growing secondary forest (some of which is situated in the Ihovbor-Evboeka community), plantations and fallow land. Although the Project site is not considered an area of high biodiversity status, some faunal and floral species of ecological significance were identified during the sampling that was conducted in the Study Area.

An ecological survey was undertaken during the wet and dry seasons to describe the existing terrestrial habitat types within the study area and to identify fauna and flora species using a combination of line and belt (10m by 5m) transects. The Study Area is characterised by human activities and vegetation types encountered areas of fallow bush of varying ages, abandoned and functional subsistence and commercial farmland, plantations for wild and domesticated oil palm and rubber species and degraded secondary rainforest as well as statutory, personal and communal forests. This is a result of non-intensive agricultural activity, including slash-and-burn

clearing, the construction and use of roads, dwellings and other structures and footpaths. A total of 48 plant families comprising 125 species were encountered. The most commonly encountered plant species and vegetation ecosystems identified were cassava, rubber plantations, secondary forest and guinea grass. One Endangered and eight Vulnerable floral species were identified (IUCN, 2001).

There are no protected areas in close vicinity to the Study Area or that will be directly affected with the development of the Project. The closest natural forest reserve is the Sakpoba Forest Reserve located approximately 20 km to the south of the Project site. According to the Nigerian Forestry Act (1958) and the Edo State Forestry Law CAP 59 (1976), the forest areas in proximity to the Study Area fall under anthropogenic or natural forest. It has been identified that the Project site is located on anthropogenic forest, fallow land none of which is cordoned off, and it is not well maintained by surrounding owners.

The impacts on biodiversity will be negative and restricted to the site and the immediate local surroundings. Although some of the impacts will be reversible over the long term, the loss of habitat will be permanent. The magnitude of the impact will therefore be moderate. The development of biodiversity management plan (BMP) which will, among other measures, include demarcation of the floral species on site by a botanist, identification of measures to protect floral species from accidental damage during construction, minimization of vegetation clearing, provision of training to staff, anti-poaching policy, minimization of surface run-off, etc.

PS8: Cultural Heritage

The resettlement of Orior-Osemwende and Idunmwowina-Urho-Nisen will implicate community cultural sites, discussed above under PS5. The acquisition of community land will likely require movement of at least 14 sacred sites from the Project area. Although the removal of sacred sites will disrupt local worship practices and could create or exacerbate tension with the communities, community members, indicated during consultation that it is possible to move the sites to accommodate the Project. Close and extensive consultation would be required with local religious leaders and authorities, and should involve appropriate consultation and compensation. In addition to these sacred sites the project site is located close to the Benin moats or earthworks, which are among the largest ancient earthworks in the world. One of the moats runs through the project site and will be preserved according to a Physical Cultural Resources plan which is currently being drafted.

F. Environmental Permitting Process and Community Engagement

The EIA includes a detailed socio-economic assessment and stakeholder engagement and disclosure process. Azura has also prepared a community engagement plan. Key issues identified by stakeholders included compensation for affected communities, NIPP related community issues (compensation), social infrastructure, health and safety, local employment opportunities, and provision of electricity. Details of all the issues raised and interactions with the various stakeholders are included in the EIA. The extent of the information provided about the project was considered to be adequate and the stakeholder comments were considered to be free in their expression. While noting the issues identified which have been addressed in the respective assessments undertaken, there were no specific objections to the project.

An Environmental Impact Assessment (February 2012), a Resettlement Action Plan (February 2012) and a draft Stakeholder Engagement Plan were prepared for the proposed Azura-Edo IPP. The EIA was undertaken in accordance with the Environmental Impact Assessment Act (Act No. 86 of 1992), Equator Principles, World Bank requirements, World Bank Group (WBG) General Environmental, Health and Safety (EHS) Guidelines and EHS Guidelines for Thermal Power Plants and is in compliance with MIGA's Performance Standards.

G. Availability of Documentation

The following documentation is available electronically as PDF attachments to this ESRS at www.miga.org:

- [*Azura-Edo Independent Power Project Environmental Impact Assessment, February 2012, ERM*](#)
- [*Annex A: Draft Azura Edo EIA and RAP Stakeholder Engagement Plan, December 2011, ERM*](#)
- [*Resettlement Action Plan \(RAP\) for the Azura-Edo Independent Power Plant, February 2012, ERM*](#)

As part of the government resettlement process, a draft EIA and RAP were disclosed for public comment in a local newspaper in February and March 2012 and on the World Bank's Information Shop website. There is also a company website which links to the Information Shop: www.azurawa.com.