

To:

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World Bank

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Groupe de la Banque africaine de développement

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EIB

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AFD [Redacted]

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CDC

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Proparco

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DEG - Deutsche Investitions- und

[Redacted]

[Redacted]

[Redacted]

From:

[Redacted]

IFI Synergy Group

[Redacted]

[Redacted]

Date: Yaounde, 8th of October 2020

Re: Investments in The Nachtigal Project

Dear Sir or Madam,

We are writing to you to seek further information on the investments in the Nachtigal hydropower project in Cameroon.

As you are probably well aware, the Nachtigal project is a large-scale hydropower project which has long been on the agenda of the Cameroonian government. In the past few years, the project secured funding from a range of development institutions, including IFC, AfDB, Proparco and CDC.

We are writing on behalf of Green Development Advocates and IFI Synergy. IFI Synergy is a Cameroonian coalition working on the topic of IFIs and accountability within Cameroon, and as such, has been following the Nachtigal project. Representatives of IFI Synergy have visited affected communities as part of a project on strengthening the capacities of communities on social and environmental policies. During these visits, our team recorded several issues and community concerns in relation to the Nachtigal dam. These concerns include unclear and delay in compensation, coercion during the resettlement procedure, limitations in the FPIC process and failure of the project owner (NHPC) to contract the promised number of local workers.

Communities have been unable to get access to the full environmental and social impact studies including: The Environmental and Social Management Plan; the resettlement and compensation action plans (PAR); the livelihood restoration plan (PRME); the Biodiversity action plan; and the archaeological resource management plan. According to IFC Performance 1, the client should provide communities access to relevant information. We would therefore like to ask the investors to ensure that NHPC makes these public and more importantly, we urge the investors to make sure the affected communities get access to these documents.

NHPC organized consultation meetings in the communities and with social bodies from 2015 onwards. Communities have been informed about the project, its benefits, and the impacts they will suffer. We kindly request clarification on how the investors verified that community members who had access to the necessary information were able to voice concerns in safe spaces, and had enough time to analyse the information they received.

Community members tell us that NHPC made promises during the consultations that are yet to be complied with. For example, NHPC promised to recruit local workers for the construction of the project, but so far, the percentage of locals working for NHPC is low - young fishermen and sanders are unemployed. We have no access to the information that outlines agreements on how many locals would be recruited by NHPC, and neither do the communities. Furthermore, NHPC promised to asphalt roads. However, NHPC does not have the capacity to asphalt roads, and communities now understand these promises as manipulations. During consultations, the population has been overwhelmed by officials in their communities. Community members did not have the impression that they had anything to say about what was going to happen. During our community visits, in 2019 and August 2020, the most pressing concern voiced by communities was compensation. Community members did not have any room to negotiate or disagree with what had been offered to them. Furthermore, several community members complain that during the inventory of properties, as well as during the payment of compensation, they were absent. Fisherfolks report that they are still waiting to receive compensation, even though they already lost access to fishing grounds. Many fisherfolks as well as fishmongers feel that the promised compensation is too low. Additionally, loss of access to clean water, sacred sites, and NTFPs (Djansang, medicinal plants, etc) from the forest cannot easily be compensated with money. IFC Performance Standard 5 requires the project to improve or restore the livelihoods and standards (economically) of displaced persons. The current situation is that community members' livelihoods has been degraded and compensation has not been adequate.

According to the information we received in different communities during our visits, communities are aware of the grievance mechanism put in place by NHPC. However, the mechanism so far has not

delivered any resolutions. Several letters have been sent to NHPC with complaints on the compensation process. Other than a confirmation of receipt, none of these complaints' letters have been replied to. Communities have not been made aware of the existence of the World Bank Groups grievance mechanisms. We ask the investors to provide us with further clarifications on these matters.

Furthermore, we urge the investors to use their existing leverage in the project to ensure the demands of the communities are met:

- Meet NHPC's original commitment to allow former sand quarry restorers to sell food at the dam construction sites;
- Recruit local youth as laborers, drivers or technicians in the dam construction project;
- Clearly outline the participatory process of reconversion of fishermen, sandblasters and fishmongers within the framework of the dam project;
- Provide electricity to villages when the dam becomes operational;
- Respect all the promises and compensatory measures contained in the plan to restore the livelihoods of communities and socio-professional bodies;
- Review through a participatory approach the compensation amounts imposed by the NHPC to ensure that the impacted population gets fair remedy and;
- Restart discussions with communities and socio-professional bodies in a participatory manner.

We would welcome further clarification from the investors and would appreciate to further discuss the issues mentioned in this letter directly.

Kind regards,
IFI Synergy Group

A handwritten signature in blue ink, appearing to be a stylized name, positioned below the typed text.