

U.S. Position on AfDB's Investment in the Regional Bagamoyo - Horo Horo / Lunga Lunga - Malindi Road Project, Phase 1 in Tanzania and Kenya

December 12, 2019

The United States supports the project's primary objective of improving transport infrastructure and regional connectivity within an important multinational coastal corridor that includes two major urban centers: Dar es Salaam and Mombasa. The United States further supports the objective of creating new economic opportunities and facilitating market access for farmers and fisherfolk. The United States also appreciates AfDB's engagement on the USAID-led visit to portions of the project site in August 2019 and looks forward to ongoing dialogue on the project during the design review and implementation.

Any project that expands access to relatively inaccessible regions may result in significant adverse environmental and social impacts. Given that the proposed alignment for this road project passes through or near numerous environmentally protected areas, it is critical to proactively identify, avoid, reduce and mitigate any adverse impacts to natural resources, including wildlife, to the greatest extent feasible, before the project design is finalized. In our view, the proposed alignment in Tanzania was chosen without comprehensive biodiversity baseline information to define the natural and critical habitat and inform actions to avoid and mitigate adverse impacts.

The United States appreciates that the project has allocated funds for a consultant to conduct an additional environmental and social baseline survey, including performing fieldwork to collect quantitative biodiversity data. The United States stresses that, for this survey to be worthwhile, its findings and any recommendations must be taken into account during the design review. The United States strongly supports AfDB management's commitment to do so. Nonetheless, the United States notes that the baseline survey and any necessary adjustments to the project design should have been completed **prior** to Board consideration.

The United States has five recommendations:

- 1) Given the importance of ensuring that adverse impacts to biodiversity and natural/critical habitat will be avoided or proactively mitigated (and monitored), it is essential that AfDB staff **update the project design per the additional baseline survey** described above. Specifically, staff should carefully review the proposed alignment in light of the survey's findings, and any recommendations stemming from the survey, with an aim to avoid adverse impacts to sensitive sites and species wherever possible. Where adverse impacts are unavoidable, staff should review the proposed mitigation measures to ensure that they are proportionate to the likely impacts on both species and habitat that are identified in the survey. If residual impacts are likely to remain even after mitigated measures have been implemented, and an offset is needed to achieve no net loss of natural habitat and/or net gain of critical habitat, staff should work with international experts to design and fund an offset for the life of the project.
- 2) Staff should monitor and report to the Board any incidences of project-related **gender impacts** and steps taken to prevent, mitigate and manage such impacts during implementation.
- 3) Staff should formalize partnerships with **local and national NGOs** in both countries to manage the project's resettlement and livelihood support programs.

4) Staff should closely supervise TANROADS and KeNHA to ensure that the project's **mitigation measures** are fully implemented throughout the life of the project and that project-affected communities are not coerced.

5) Staff should provide detailed information about AfDB's accountability mechanism and the project-level **grievance redress mechanism** (GRM) to project-affected communities. Information should be regularly and widely disseminated in the appropriate local language(s). Staff should also monitor and publicly report whether the project-level GRM is functioning well, staffed sufficiently, and easily accessed by project-affected communities.

With these comments, the United States **supports** the project and look forward to seeing how the experiences from this first phase will benefit Phase 2.