

# **WOMEN STAND THEIR GROUND AGAINST BIG COAL:**

The AfDB Sendou  
plant impacts on  
women  
in a time of  
climate  
crisis

## RESEARCH REPORT

### Women stand their ground against BIG coal:

The AfDB Sendou power plant impacts on women in a time of climate crisis

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*Minerals port in background.*

*Credit: WoMin, October 2019*



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# Acronyms

<b>AfDB</b>	African Development Bank	<b>ILO</b>	International Labour Organization
<b>BOAD</b>	West African Development Bank	<b>IPCC</b>	Intergovernmental Panel on Climate Change
<b>BCRM</b>	AfDB Compliance Review and Mediation Unit	<b>LSD</b>	Lumière et Synergie pour le Développement
<b>CBAO</b>	Compagnie Bancaire de l'Afrique de l'Ouest	<b>NGO</b>	Nongovernmental organisation
<b>CES</b>	Compagnie d'Electricité du Sénégal	<b>OECD</b>	Organization for Economic Cooperation and Development
<b>COP</b>	Conference of the Parties	<b>RMC</b>	Regional member country
<b>CSO</b>	Civil society organisation	<b>SENELEC</b>	National Electricity Board of Senegal
<b>ESAP</b>	Environmental and Social Action Plan	<b>SGBV</b>	Sexual and gender-based violence
<b>ESIA</b>	Environmental and Social Impact Assessment	<b>SOCOCIM</b>	Société de Commercialisation du Ciment
<b>EESA</b>	Environnemental Evaluation of Sites and Organisms	<b>UNFCC</b>	United Nations Framework Convention on Climate Change
<b>FMO</b>	Netherlands Development Bank	<b>UK</b>	United Kingdom
<b>GHG</b>	Greenhouse gas	<b>UN</b>	United Nations
<b>GOS</b>	Government of Senegal	<b>USA</b>	United States of America
<b>HES</b>	Health, Safety and Environmental and Community Engagement	<b>WoMin</b>	African Gender and Extractives Alliance
<b>IFC</b>	International Finance Corporation	<b>XOF</b>	The West African CFA Franc used by eight West African countries and guaranteed by France's Treasury.
<b>IFI</b>	International Financial Institution		

## Abbreviations

**Ecofeminist framework:** Ecofeminist impact assessment framework

**Sendou I:** Sendou I coal power plant

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# 1 Introduction and background

## Evaluation, objectives and methodology

In late 2018, civil society organisations Lumière et Synergie pour le Développement (LSD), a member of the Coalition of African Civil Society Organisations on the African Development Bank (AfDB) and the WoMin African Gender and Extractives Alliance partnered to commission a gender impact assessment of the Sendou I coal power plant in Senegal. The objective was to engage the AfDB on its gender policy.

This first round of the impact assessment provided initial evidence that Sendou I, co-funded by the AfDB, West African Development Bank (BOAD), Netherlands Development Bank (FMO) and Compagnie Bancaire de l’Afrique de l’Ouest (CBAO), had compromised the livelihoods of more than 1 000 women fishers in the coastal area of Bargny, south of Dakar in Senegal. They have been at the forefront of a fight against Sendou I since its inception in 2009. They have expressed their concerns about the threats the power plant poses to their communities’ fundamental rights and livelihoods, the high risks of pollution and its impact on people’s health, and the destruction of their communities’ cultural heritage.

The research applied an ecofeminist impact assessment framework (see full framework in Annexure 1) which in this report will also be referred to in short as an “ecofeminist framework” and “framework”. The framework was developed by LSD, WoMin and Gender Action. The organisations wanted to understand and analyse the extremely negative impacts Sendou I as a large-scale project has on women’s lives, livelihoods, and on the environment and natural resources they and their communities rely upon for survival.

Focusing on nature and women intersectionally is critical given the ecological and climate impacts of a still-dominant fossil fuels energy system. Despite compelling scientific evidence that fossil fuels are a key driver of climate change, powerful corporations and development banks continue to support its use for energy. The climate and ecological crisis has particular impacts on the majority of African women. They are the ones who carry primary responsibility, due to an unequal patriarchal division of labour, for putting food on the table and taking care of ecosystems, families and communities.

As mentioned, three nongovernmental organisations cooperated in building and applying this groundbreaking ecofeminist framework. They draw on their significant accumulated and complementary expertise:

- LSD has a long history of work focusing on transparency, accountability and human rights in the AfDB.
- Since 2012, WoMin has undertaken substantial work to highlight the gendered impacts of extractives in 11 countries across the African continent. WoMin supports women's movement building and the advancing of ecofeminist development alternatives.
- Gender Action has deep experience working in African countries and the rest of the world to highlight the gender impacts of financing by International Financial Institutions (IFIs).

This report is for civil society organisations who wish to understand and evidence the impacts of large-scale development projects in ways that address women's rights, ecology and climate.

The framework can be used to support similar assessments of the impacts of large-scale development projects across and beyond the African continent. Civil society organisations can use the framework for lobbying purposes. They can present IFIs with the evidence of impacts of their decisions to finance such large-scale projects. This report also targets the AfDB. It illustrates how AfDB-supported projects, such as Sendou I, do not substantially adhere to – and in fact undermine – its own gender strategy, principles and evaluation framework. The overall impact of such large-scale projects is deeper poverty and immiseration for the very women the bank has, as its stated aim, to empower.

This research confirms the correctness of the AfDB's 23 September 2019 announcement that it will no longer support coal investments. We provide further evidence that the AfDB must meticulously track its financing. The bank needs to guarantee that the private institutions it loans money to do not support coal projects.

## Objectives of the ecofeminist impact assessment framework

The assumption underpinning the impact assessment is that to date the AfDB has been making investment decisions which fail to consider the inter-related gendered, ecological and climate impacts of large-scale development projects. The majority of women in the bank's regional member countries are the primary agricultural workers, caretakers of natural resources, and principally responsible for the care and reproduction of their families and communities.

Specific objectives of our impact assessment are to:

- Identify the impacts of Sendou I on:
  - women's rights
  - women's livelihoods
  - the local environment of the impacted communities.
- Analyse how ecological problems arising from Sendou I intersect with the social factors of gender, class and patriarchy to impact women's lives in particularly harmful ways.
- Assess the gendered impacts and implications of Sendou I as compared with the AfDB's gender policy and strategy.
- Assess the AfDB's gender policy and impact assessment framework from an ecofeminist perspective.
- Help African women's movements and networks develop effective strategies to challenge the AfDB's support for extractivist projects through the application of a new ecofeminist framework.
- Provide evidence to support the AfDB's 23 September 2019 commitment to stop all coal investments.

## Methodology

The ecofeminist framework draws on existing literature and the 2018 LSD and WoMin gender impact assessment of Sendou I in Bargny. This provides a gendered analysis of Sendou I's impacts and their implications. It explores how an ecofeminist framework can unpack and address the related issues and strengthen women's agency and proposals.

This report's methodology and findings are based on:

- an analysis of extensive documentation on Sendou I, including existing

accounts from LSD and local civil society organisations, and reports from the project promoters and financiers

- focus group discussions with the women and community members affected by Sendou I and interviews with key informants conducted during field research in June and October 2019
- feedback from the above stakeholders on the preliminary research results presented on 6 June 2019 in Bargny.

The research also draws on information collected during field mission visits to the following sites:

- Sendou I, Bargny (our researchers did not have access to the site but could view it from outside the security fence)
- adjacent fish transformation / processing space, Khelkom
- fishing dock and houses damaged by coastal erosion, Bargny
- cemetery and kindergarten in Minam
- mineral port currently under construction adjacent to the village of Minam; the port will conduit coal originating in South Africa to Sendou I.

*View from a classroom at the Minam Primary School, located just 388m from the coal-fired power plant.  
Credit: Pierre Vanneste in African Arguments*



The LSD team arranged the focus group discussions with the Khelkom women, as well as semi-structured interviews with other women and men affected by Sendou I. In addition, informal discussions were held with key informants (mainly men) from the environmental NGO Takkom Jerry and the Collectif des communautés affectées de Bargny<sup>1</sup>.

## Limitations of the assessment

### Documents and data

The assessment was limited by the availability of and access to necessary documentary sources. For example, the literature review could have benefitted from access to documents on the Sendou I project appraisal and monitoring. However, the AfDB does not disclose these. There is also no available data for some of the indicators and standards proposed in the ecofeminist framework. There are therefore limitations in drawing firm conclusions on some of the indicators.

### Interviews and focus group discussions

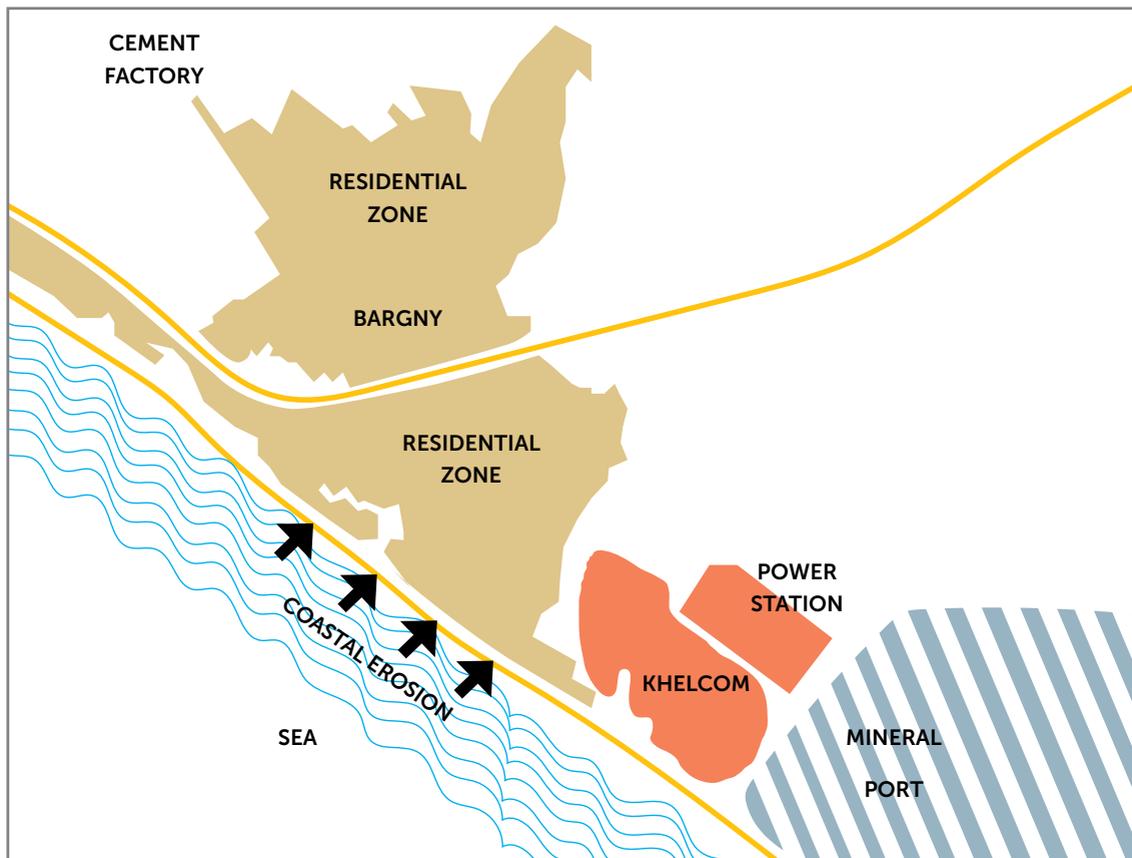
The number of interviews and discussions during the field research was limited by uncertainties related to the final date of the Korite<sup>2</sup> celebration in Senegal. This also informed our researchers' decision not to meet with the local authorities and promoters of Sendou I. Instead, the number of meetings with project-affected women and community representatives was maximised.

In addition to time constraints arising from the schedule of women's activities on the Khelkom site where they dry and smoke the fish, a further challenge was the large numbers of Khelkom women who arrived to participate in meetings with the researcher. This rendered smaller focused discussions impossible.

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<sup>1</sup> A collective gathering of representatives from several local groups including fishers, fish processors, landowners and livestock herders at the community level.

<sup>2</sup> Muslim celebration of the end of the Ramadan in Senegal.



Women resting at the Khelkom fish processing site with Sendou 1 as a backdrop.  
Credit: LSD



## 2 The local context of Sendou I

### The social, economic and cultural context

The majority of people affected by Sendou I are from Lebou's traditional fishing community and from families who have lived in the village of Minam and the Commune of Bargny for generations. In 2009, the population of Bargny, including Minam, was 36 516 inhabitants, the majority being women (18 377) (Quartz Afrique, 2009). According to the latest (2017) estimates from the Commune of Bargny, its population is approximately 51 000. Around 900 of these people live in the village of Minam.

The affected communities are confronted with several industrial developments which have brought about considerable difficulties in their living conditions. These are developments which will eventually geographically surround them. Société de Commercialisation du Ciment (SOCOCIM), a cement factory north of the community, was built a few years ago. It produces significant air pollution. The factory sits opposite Sendou I, which was more recently constructed. A port for trade and storage of commodities for the West African region is being established near Sendou I. On the other side, a new toll road has cut off the town of Bargny from its hinterland.

For local people's livelihoods, men fish while women dry and smoke the fish for household and local consumption and for export to neighbouring countries. These countries include Burkina Faso, Guinea and Mali to which the communities have been exporting for generations. But the fisher men now have to deal with decreasing fish stocks in their fishing waters because they have to compete with large modern European vessels operating along the West African coast. As for the women, the deleterious effects of the Senegalese government's energy policy choice to build a coal power plant are manifold.

Both communities of Minam and Bargny are gravely affected by coastal erosion, which is estimated to be advancing by between 1–3 metres a year (LSD, 2014). Many houses have already been swept into the sea, as has a mosque, a cemetery and a soccer pitch. The houses of two women leaders interviewed during the field research were in danger of soon being swept into the sea. Land which the mayor designated to resettle families who had lost land and housing due to coastal erosion was instead allocated to the Sendou I coal power plant. Because people do not want to move, issues around land rights have become paramount in their confrontation with the promoters of Sendou I.

Coastal erosion damaging homes  
in the town of Bargny, Senegal.  
Credit: WoMin, October 2019



**Coastal erosion** occurs when waves, tidal currents or people remove material from the coast. Coastal erosion usually causes a landward retreat of the coastline. Human activities can strongly influence erosion. For example, when people build structures such as breakwaters, barriers and seawalls, they can cause changes in coastal sediment transport pathways. This can result in coastline erosion in some areas and a build up of sediment in others. On larger scales, natural and human-induced climate change can adjust the likelihood and rate of coastal erosion. Coastal erosion becomes a hazard when society does not adapt to its effects on people, the built environment and infrastructure.

People most at risk from coastal erosion live in coastal lowland areas or along 'soft' sediment coastlines where coastal erosion can cause flooding, rock falls, loss of land and damage to infrastructure.

Adapted from: <https://www.bgs.ac.uk/discoveringGeology/climateChange/general/coastalErosion.html>; <https://www.ga.gov.au/scientific-topics/community-safety/coastalerosion> [Accessed on: 4 October 2019]

## The institutional and legal framework

The Sendou I project planning, construction and exploitation phases are framed by various regulations and norms. These are based on both national and international requirements in relation to environmental and social safeguards. The requirements include specific performance norms and standards imposed by the respective policies of the international financial institutions (IFIs) involved in the project.

### National requirements

At the national level, the relevant legal and policy requirements pertain to the international conventions, treaties and protocols on the environment that Senegal has ratified. To this is added an array of national laws and associated implementing decrees and policies related to biodiversity, cultural heritage and public health (hygiene). It should be noted that the Constitution of Senegal guarantees the right to a healthy environment. This is based on Article 24 of the African Charter on Human and People's Rights which can be accessed at <http://www.humanrights.se/wp-content/uploads/2012/01/African-Charter-on-Human-and-Peoples-Rights.pdf>. See Annexure 1 for details on national requirements.

Senegal has ratified the United Nations Framework Convention on Climate Change (UNFCCC), the Kyoto Protocol, and the Paris Conference of the Parties (COP) 21 agreement, which has superseded the Kyoto Protocol.

In September 2015, Senegal published its non-binding Intended Nationally Determined Contribution (INDC) to the UNFCCC. This committed Senegal to carbon emission reductions relative to baseline projections of 3% in 2020, 4% in 2025 and 5% in 2030. In spite of this commitment, and a wide range of alternative clean sources of energy that it could pursue, the Senegalese government proceeded with the Sendou I coal power plant. Sendou I is expected to contribute 1 000 Gg of CO<sub>2</sub>-eq. per year. This represents 22.6% of its total greenhouse gas (GHG) emissions (Quartz Afrique 2009: 150). This percentage will increase in the coming years if the project expands according to existing plans.

### International norms and policies

In addition to the national laws and regulations, Sendou I's operations are expected to comply with many international norms and standards, together with the respective norms and policies of its lenders, namely the AfDB, BOAD, FMO and CBAO. These include requirements and guidelines related to environmental management, risk management, performance standards, health and safety, and human rights protection. See Annexure 2 of this report for the details of these.

## Introduction to the Sendou 1 project

Energy shortages and power cuts have become so commonplace in Senegal that energy supply emerged as an important election issue during both the 2012 and 2016 presidential election campaigns. As part of its economic development plan, Senegal's government aims to improve the country's energy supply and ensure better supply reliability. To that end, it took the decision in 2015 to build a "modern, state-of-the-art coal power plant" (FMO 2017: 8) as an alternative base load<sup>3</sup> energy supply. It is expected to provide around 30% of the country's electricity needs. Senegal currently generates 80% of its electricity from diesel-fueled power. Sendou I had initially been developed as two units of 125 MW each. At the time of our field research, the government had already decided not to proceed with the second unit (Sendou II), and to focus solely on Sendou I (BOAD 2018), a 125 MW coal power plant.

Sendou I is a corporate-driven project implemented by the Compagnie d'Électricité du Sénégal (CES), a consortium of companies led by the Nykomb Synergetics Development group from Sweden. Sendou I has been established with co-financing to a total project cost of XOF 118 billion (just over USD 200 million) (Environmental and Social Impact Assessment: ESIA 2009) by FMO, AfDB, BOAD and the CBAO. The AfDB became the mandated lead arranger for debt financing of Sendou I, with a contribution of about 37% of the loan financing, according to a letter signed on 6 April 2009 adjusted by supplemental agreement on 27 August 2009. This means the AfDB facilitates and leads the above-mentioned group of lenders in the loan financing for Sendou I.

The National Electricity Board of Senegal (SENELEC) commissioned Nykomb to build Sendou I which in turn created CES to construct and operate the power plant through a "Build, Own, Operate" arrangement for a period of 25 years. This implies that CES has acquired the right to construct the power plant according to agreed design specifications, and to operate the project for that specified time.

Sendou I is located on 29 hectares of land near the village of Minam and the Commune of Bargny, 32 kilometres from Senegal's capital city, Dakar. The project site includes a base camp of 162 m<sup>2</sup> for the plant's personnel and a coal storage area of 30 000 m<sup>2</sup>. It is surrounded by a 500-metre Security Zone<sup>4</sup> owned by SENELEC, in line with the

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3 The base load is the minimum level of electric power delivered or required over a given period of time at a constant rate. Power plants that do not change their power output quickly, such as large coal or nuclear plants, are generally called base load power plants. They are considered a reliable source of energy within an efficient electrical grid. Source: [https://en.wikipedia.org/wiki/Base\\_load](https://en.wikipedia.org/wiki/Base_load) [Accessed 10 October 2019]. The government of Senegal selected coal generated power for its supposed cost-effectiveness.

4 It has been underlined in the latest Health, Safety and Environmental and Community Engagement (HSE) report that the Security Zone is measured (without explanation) from the plant boiler and not the boundary of the site (Health, Safety and Environmental and Community Engagement (HSE) consultants Monkey Forest, cited in AfDB, 2017).

Senegalese Decree 2001-282, of 12 April 2001, applicable to the Environmental Code, under Article L13 applying to ‘Class 1’ projects:

*“Installations in the first class (e.g. Boiler and Coal storage) shall be subject, before construction or commissioning, to an authorization from the Minister of the Environment. This authorization is subject to such installations being over 500m distant from any dwellings, buildings usually occupied by third parties, public buildings and areas intended for habitation, watercourses, lakes, and water catchments.”*

Furthermore, Sendou I is situated in an area that, some decades back, was zoned for industrial development. The coal power plant joins the cement factory (SOCOCIM) and the Bargny-Sendou mineral port which is currently under construction. The port will become Senegal’s main industrial port and is located near the small village of Minam. The government is considering the possibility of relocating Minam’s inhabitants.

The coal required to operate Sendou I will be imported through the Bargny-Sendou mineral port. The current coal stock was shipped in from South Africa and, for the foreseeable future South Africa will continue to supply coal. Some analysts expect (FMO, 2017) that the new mineral port, located at the south-east end of Sendou I, will negatively affect the coal power plant’s water supply, access road and trainline. In addition, it will exacerbate existing land and economic displacement issues and cause significant environmental impacts.

Because of a dispute between two sponsors around signatory rights and decision-making, the implementation of Sendou I was delayed until November 2013. Until the partnership and financial issues had been resolved, the Environmental and Social Impact Assessment (ESIA) was put on hold. This resulted in serious drawbacks, notably:

*“(i) Mismanagement of land issues by the former Government of Senegal; (ii) Inadequate information from the current Government of Senegal; (iii) Difficult socioeconomic context; (iv) Lack of communication; and (iv) the Compagnie d’Electricité du Sénégal (CES)’s limited understanding of social performance standards and lack of capacity for managing social and environmental issues.” (Health, Safety and Environmental and Community Engagement (HSE) consultants Monkey Forest, cited in AfDB, 2017).*

In January 2014, the local community organised a public demonstration on the Sendou project site to express their opposition to the establishment of the coal power plant

in the area of Bargny-Minam. This demonstration was supported by the highest traditional authority of the Lebou community.

In late 2015, the Quantum Power group from the United Kingdom (UK), and a new shareholder, acquired their 51% interest from the previous sponsor, Nordic Power. This enabled Sendou I construction to restart in January 2016, at which time a revised environmental and social action plan was prepared. Sendou I started its operations on 21 October 2018 (AfDB, 2019). Ironically, this was just under one year before the AfDB announced, on 23 September 2019 at the UN Climate Summit, its decision to stop financing all coal-related projects because of their dangerous fossil fuel emissions (AfDB, 2019b).

On 10 August 2016, two complaints were lodged with the AfDB Compliance Review and Mediation Unit (BCRM) by Senegalese national civil society organisations. These were, respectively, the environmental NGO Takkom Jerry together with LSD, and the Collectif des communautés affectées de Bargny, which gathers representatives of members of other affected communities in Bargny. The two complaints raised similar issues relating to the negative impacts of the Sendou I project, which are addressed from a feminist perspective in the next section of this report.

Amongst other matters, the organisations' complaints pointed to the rights violations arising from the imposition of the 500-metre buffer zone for Class 1 projects, as

*Public demonstrations against the Sendou I project on 7 January 2014  
Credit: LSD, 2014*



January 2014 protest against Sendou I. Credit: LSD



prescribed in Senegalese environmental law (FMO, 2017; BOAD, 2018; AfDB, 2017). These concern encroachments onto Khelkom, the fish transformation site which is where more than 1 000 women dry and smoke fish for their livelihoods. It is now located within the 500-metre buffer zone, a matter previously raised in the ESIA of 2009.

A compliance review was conducted in May 2017 by a panel of experts mandated by the AfDB's BCRM to determine the extent to which the financing of the Sendou I project was in line with the AfDB's environmental and social policies. The BCRM report produced in May 2018 concluded that "the Sendou Power Plant Project did not fully comply with the safeguard policies, particularly the AfDB's Involuntary Resettlement Policy and Environmental Assessment Procedures for Private Sector Operations" (AfDB 2019: 2).

Consequently, an environmental and social action plan was developed, and a tripartite agreement was signed between the local authorities of Bargny, CES and SENELEC to address the complaints. The plan "aimed at improving the livelihoods of the Bargny community in general, and Khelkom women in particular" (AfDB 2019: 5). A Project Monitoring and Control Committee, including the complainants, representatives of the local communities, the Bargny Municipality and CES was also established.

During our field research in June 2019, the women who participated in the group discussions and interviews indicated they did not know about the environmental and social action plan. An exception was the president of the Khelkom women, Ms Fatou Samba, who had heard about it from LSD. Ms Samba declared she did not agree with the plan which includes the following main actions targeting the Khelkom women:

- Organisation of a visit from 19 to 23 May 2017 to JORF LAFSAR power plant in Morocco to show local communities, including Khelkom representatives, a concrete example of a well-managed power plant that does not generate negative impacts on the socio-economic activities of local communities;
- Modernisation of fish drying facilities – works to install a 40-foot container for Khelkom women;
- Construction of a bridge to facilitate access to Bargny-Guedj and the Khelkom site during the rainy season;
- Construction of washroom facilities for Khelkom women and electrification of the site by SENELEC;
- Support for the economic activities of women who dry and package fish and the population of Bargny in general, through the establishment of a revolving credit fund of XOF 30 million (about US\$ 50 193); and
- Establishment of a wastewater management system (AfDB 2019: 6).

According to the Environmental Code of Senegal, the Sendou I coal power plant is a Class 1 project with high potentiality for grave dangers or drawbacks concerning health, security, public health, agriculture, nature, and the environment in general. With respect to the Environmental and Social Risk Categories and mitigation requirements adopted by the World Bank Group and adhered to by the AfDB “Category A projects present the highest environmental and social risks. Their impacts are irreversible, cumulative, diverse or unprecedented and may affect an area larger than the project sites” (Gender Action 2018: 5). The Senegalese law, as well as the AfDB, require Category A projects “to complete an environmental and social impact assessment (ESIA), which examines potential negative impacts and provides recommendations for improvement” (Gender Action 2018: 5). The AfDB, the Senegalese government and the project developers should therefore have expected from the outset that the construction of Sendou I would bring about critical negative impacts, which would be clearly gendered in nature.

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# 3 Analysis of the impacts of Sendou 1: applying an ecofeminist framework

## Ecofeminism and ecofeminist impact assessment

An ecofeminist perspective posits that current dominant development processes and decisions are shaped by the point of view that nature, or natural resources, are at the service of humans. This view reduces nature and natural resources to inputs to extractive production processes, such as power stations, dams, and agricultural projects, which ultimately destroy these resources upon which humans and all species survive.

An ecofeminist orientation holds that patriarchy – the organisation of society to serve the interests of men – does the following:

- dehumanises women
- excludes women from decision-making
- brings women’s labour into exploitative service of the dominant economy and men’s interests in households and communities.

The dominant division of labour assigns primary responsibility to women for the production, processing and preparation of food, provisioning water and fuel, and taking care of household members. Because of these roles, women – and working class and peasant women in particular – have a fundamental reliance on natural resources and a healthy environment. Consequently, when there is a catastrophic environmental fallout as a result of projects such as Sendou I, the negative impacts fall most heavily on women and increases the time and difficulty of the unpaid care work they do. Women are usually forced to:

- work longer hours to supplement lost household income
- search further and for longer periods for clean sources of water and energy
- provide additional time and effort to care for household members who become ill because of polluted environments.

The externalised costs women absorb in day-to-day life are generally ignored, and are neither costed nor compensated for in claims against corporations and states. An

ecofeminist analysis acknowledges that women, because of their assigned patriarchal social and economic roles in society, have different perspectives on, and needs, in development. An ecofeminist analysis insists all of this must be taken into account in any just development process.

Ecofeminist perspectives are generally weakly represented in most feminist or women's rights organisations. However, WoMin has found that ecofeminist perspectives resonant powerfully with the experiences and perspectives of women in peasant and poor urban communities across the African continent. It is from this vantage point that WoMin has evolved its ecofeminist ideas and approach. We have brought this to bear, in concert with our partners LSD and Gender Action, in creating a new and groundbreaking ecofeminist impact assessment framework, also abbreviated to "ecofeminist framework" in this report.

Impact assessment frameworks employed by women's rights and mainstream development organisations, as well as multilateral institutions and IFIs are generally constructed around a gender perspective which brings attention to differences in gender roles, rights and interests on the basis of the social construction of gender. Such a gender approach to impact assessment would therefore identify gendered interests, forecast gendered impacts, and work to mitigate or challenge negative differentiated impacts on men and women. A mainstream gender approach would generally not:

- focus particular attention to women as a constituency but rather focus on gender differences between men and women
- work to advance women's organising and women's particular perspectives within its processes
- highlight the environmental or climate impacts of a project and the differentiated impacts of climate or environmental crisis on women specifically
- critique the inherent logic driving large-scale development projects.

## Indicators and standards for an ecofeminist framework

An ecofeminist framework addresses the limitations of gender impact assessments. It brings questions of ecology and climate, women's rights, and alternative viewpoints about development into the evaluation process. In April 2019, LSD, WoMin and Gender Action cooperated to build an impact assessment framework founded on ecofeminist considerations. This framework has four key indicators and a set of standards for each. See the detailed and complete framework in Annexure 1 of this report.

### Indicator 1

Consent rights for affected communities and women

### Indicator 2

Women's rights and ecofeminist analysis in project planning, implementation and ongoing monitoring

### Indicator 3

Compensation and redress

### Indicator 4

Ecofeminist cost benefit analysis

Next in this report we apply each indicator and its standards to evaluate Sendou I. We do this for both the planning and operational phases, based on the literature review, the findings of the field research of June 2019, and the findings from a follow up field visit in October 2019. The evaluation is mainly qualitative in nature. The base year of this evaluation is 2009, when Sendou I was approved by the AfDB, and the ESIA and public consultation were conducted.

### Indicator 1: Consent rights for affected communities and women

The following sets out the standards to assess implementation of Indicator 1:

- Use participatory methods in which women, and all affected peoples, are involved in the processes of research, assessment of potential impacts and the making of informed decisions.
- Ensure full and ongoing participation of women in all key project cycle processes. This includes ongoing monitoring after a project has been put into operation and the provision of safe women-only spaces for them to express their views and perspectives about the project on an ongoing basis.
- Provide complete information about the full range of social, economic, political and environmental impacts on potentially affected community men and women. This should be presented to communities to inform their deliberations about whether the project should proceed or not. See Indicator 2.

- Based on them receiving all relevant and pertinent project information now and in the future:

Affected community women and men exercise their free, prior and informed consent right to accept or refuse a proposed project which impacts on their rights to land, forests, fisheries, livelihoods, cultural heritage, bodily autonomy and health. Specifically, all people and women specifically, have the right to refuse:

- the terms of a project proposal
- the project with or without amendments to project design
- resettlement to new land and / or homes which do not satisfy their needs and replace for real losses that will be incurred as a result of the proposed project
- compensation, including monetary payment
- corporate social responsibility attempts which do not address substantive losses
- the introduction of toxic chemicals and harmful technologies, including “false solution” technological responses to the climate crisis, that destroy people’s health and wellbeing, and negatively impact biodiversity, soil fertility, water quality and increase greenhouse gas (GHG) emissions and the risk of climate change calamities.

## Impact analysis

In compliance with the environmental regulations of Senegal<sup>5</sup>, an environmental and social impact assessment (ESIA) of Sendou I was conducted in March 2009 by the consulting firm Quartz Afrique. The ESIA report rightly pointed to potential social conflicts due to the majority of the local people’s opposition to the project. This had already been expressed during a public consultation on 28 February 2009.

The Sendou I project planning and implementation processes lacked participatory and inclusive approaches. This was underlined in the Compliance Review report by Netherlands Development Bank (FMO) according to which Sendou I was put into Category A. This means “more emphasis should have been placed on consultation with the local population in the early phases of the project, most preferably during the design phase” (FMO 2017: 2). The AfDB Compliance Review and Mediation Unit (BCRM) report (AfDB, 2019) further emphasised the absence of appropriate consultations with affected persons.

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<sup>5</sup> Articles L48 to L50, Law 2001-01 of 15 January 2001 on the Environnemental Code, and articles R38 to R40, Implementing Decree 2001-282 of 12 April 2001.

The affected communities were not given adequate and timely information about the negative impacts and mitigation measures before project design in violation of their right to information. The Kelkhom women and all affected people were not involved in any process of researching or assessing potential impacts. These conclusions about community exclusion are reflected in various reviews and assessments of the BCRM, FMO and BOAD, and include an acknowledgement of the failure of the project sponsors to develop, share and implement an adequate Environmental Management Plan (AfDB 2019: 2; FMO, 2017; BOAD 2018).

Our group discussions and interviews confirm that the project promoters and local authorities had not engaged, apart from the public consultation on 28 February 2009, with local communities on their views and interests at different points of the project decision-making processes. The Kelkhom women, in particular, underlined that they had been excluded from key moments of project decision-making. They indicated that it was only after community complaints had been lodged with the AfDB and other lenders that a minority of women were consulted on some decisions. This is evidenced in the BCRM report (AfDB, 2019). Thus, the Sendou I coal power plant's operations started in October 2018 in spite of the affected communities' continued opposition.

#### **Indicator 2: Women's rights and ecofeminist analysis in project planning, implementation and ongoing monitoring**

The following sets out to assess implementation of the standards for Indicator 2:

- Map and baseline gendered resource access and control, livelihoods, the gender division of labour and patterns to forecast potentially negative impacts on women in affected communities.
- On the basis of the above analysis and the experiences of other similar projects, present the most likely gendered impacts of the project for the following categories, bearing in mind that they are interrelated:
  - economic (land rights; economic displacement)
  - social (livelihoods; access to energy and drinking water; health)
  - cultural (customs and cultural rights)
  - environmental (air, soil and water pollution; climate change).
- Pay particular attention to the dominant gender division of labour, including:
  - the volume of women and girls' unpaid labour
  - the tasks / areas of work in which the above predominates
  - carefully forecasting possible increases in this unpaid care work.
- Fully evaluate and measure situations where sexual and gender-based violence (SGBV) is likely to occur, and what measures are implemented to prevent it, especially in regard to:

- potential SGBV perpetrated by security guards and / or military engaged to guard project sites
- potential impacts of an influx of male construction workers
- safety conditions for girls and women's access to water points, energy, latrines, schools and other necessary services
- mechanisms for redress in regard to SGBV, including providing high-quality healthcare and psychological support for victims / survivors and punishment for perpetrators.
- Has instituted measures to prevent negative project impacts on women and men within environmental safeguards, including:
  - risk calculations
  - financial guarantees and provisions for ongoing clean up and / or - rehabilitation of land on project conclusion.
- Has mechanisms to ensure ongoing project monitoring, including mechanisms to gather and act on gender disaggregated data.
- Has established processes to address women's specific issues, perspectives and concerns raised throughout the project cycle.

## Impact analysis

The literature review indicates that most of the data on Sendou I is not gender-disaggregated. This means data has not been collected separately on men and women as a starting point for the analysis, planning, monitoring and evaluation of the project from a gender perspective. In particular, the 2009 ESIA which informed Sendou I's formulation and implementation processes includes very limited sex-disaggregated data and scanty reference to the potential impacts of Sendou I on women's livelihoods.

The ESIA report, as well as the subsequent Compliance Review and Audit Reports (FMO, 2017; BOAD, 2018; AfDB 2019) indicate the following project failures:

- There is no evidence of a natural resource mapping or livelihoods analysis, or gendered analysis of the same.
- There was no monitoring of the intersections between gender, social, economic and environmental impacts.
- The externalised social and environmental costs of the Sendou I project have not been monitored and evaluated across the project cycle. This is evidenced in the poor planning for, and consideration of, the deeply harmful impacts of the project-imposed restrictions on women's access to the Kelkhom site, which is where women make their livelihoods.
- The damaging impacts of Sendou I on health, community, culture and increased burdens of care work on women was not considered.

By and large, it appears that the Sendou I project impact assessment framework its promoters used, as well as the measures to prevent negative impacts, are gender-blind.

### **Environmental impacts**

The ESIA report concluded that Sendou I, in general, will have relatively positive impacts on the social, cultural and economic environment and that the applicable performance standards and norms have been respected, including the International Finance Corporation Performance Standards (IFC PS) and the Equator Principles<sup>6</sup> (Quartz Afrique, 2009, cited in LSD, 2014).

Since then, however, the ESIA report has been questioned for the lack of several baseline assessments. The lenders' compliance reviews and this ecofeminist impact assessment point to the absence of baseline and monitoring data on:

- economic, social and cultural impacts, notably on livelihoods
- impacts on health, social wellbeing, cultural heritage, safety, and women's unpaid labour
- up-to-date environmental impact data on air and water pollution (FMO, 2017; BOAD, 2018).

The ESIA report has also been criticised for its failure to properly assess the impact of Sendou I on air quality and community health and safety (FMO, 2017; BOAD, 2018), along with a number of environmental issues raised by the local population during the public consultation on 28 February 2009. The issues are outlined below.

### **Thermal pollution of the sea and the destruction of the marine ecosystem**

This includes the destruction of a fish nursery site ("aire de cogestion") on Bargny's coastline. The nursery has been destroyed because of the intake and release of sea water for Sendou I's cooling system. Local people fear Sendou I's negative impacts on marine resources, which would threaten their main source of livelihoods and employment.

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<sup>6</sup> The Equator Principles (EPs) is a risk management framework adopted by financial institutions (FIs). It is used for determining, assessing and managing environmental and social risk in projects. EP is primarily intended to provide a minimum standard for due diligence and monitoring to support responsible risk. The EPs apply globally, to all industry sectors, and to four financial products: 1) Project Finance Advisory Services 2) Project Finance 3) Project-Related Corporate Loans and 4) Bridge Loans. The FIs that have adopted the EPs commit to implementing them in their internal environmental and social policies, procedures and standards for financing projects. They have committed to not providing Project Finance or Project-Related Corporate Loans to projects where the client will not, or is unable to, comply with the EPs. Source: <https://equator-principles.com/about/352/> [Accessed 10/10/2019]

### **The alteration of the air quality**

Due to hazardous pollutants such as nitrogen monoxide, sulphur dioxide and carbon monoxide, and also due to dust emissions, including ashes – it is estimated that Sendou I will produce 176 tons of ashes per day – the ESIA 2009 has been criticised for “the use of outdated standards and a failure to assess cumulative impacts of the Sendou I plant, the cement factory (SOCOCIM), the coal transport from the Dakar harbour, and an additionally planned 125 MW coal power plant (Sendou II)” (FMO 2017: 10).

The ESIA underlined that atmospheric pollution through the chimneys and ashes is the major negative impact of the Sendou I project type (Quartz Afrique, 2009). But there was no evaluation of the potential health problems and dangers of the power plant and its polluting air emissions (BOAD, 2018). Through our ecofeminist impact assessment, women have pointed to an increased incidence of respiratory diseases due to Sendou I’s emissions. They gave testimony about numerous health problems their community was experiencing, including asthma, chronic allergic conjunctivitis and rhinitis, and reported a disturbing increase in the prevalence of tuberculosis in Bargny. They attributed these health conditions to atmospheric pollution arising from the coal power plant’s operations. The women who work near the plant are particularly affected.

Respiratory infections and an increased range and incidence of other health conditions have gendered impacts. This is because the prevailing division of labour assigns women household members the primary responsibility for the work of care. Women have to increase the time they spend in unpaid care work and, out of necessity, divert scarce household resources to health-related needs such as transport to health facilities, visits to doctors, and the purchase of medicines. Environmental impacts affect people’s wellbeing and have differential impacts on men and women in households and in the community at large.

### **Contamination of water and soil**

Water and soil are contaminated by toxic metals contained in ashes and from the uncontrolled release or seepage of wastewater from Sendou I. During our site visit with the residents of the Khelkom association in June 2019, we identified serious problems concerning the disposal of wastewater from the power plant. This occurs via a long, open trench which drains wastewater from the plant directly into the sea. This will have catastrophic consequences on the marine ecosystem, the exact nature and extent of which needs to be fully investigated.

In January 2019, Sendou I released wastewater into the women’s fish transformation site at Khelkom, which caused significant loss and damage to their harvest of dried fish. They held a meeting with key stakeholders, including the power plant directors and local authorities, during which the latter acknowledged the harm and committed

themselves to repairing the damage. Three women who lost their fish harvest were compensated for their actual losses but no one was compensated for lost labour time. In October 2019, the wastewater from the January 2019 flooding was still pooled in the site and is reported, on the basis of two rounds of water testing, to evidence extremely high water pollution levels.<sup>7</sup> The levels substantially exceeded both the Senegalese and World Bank norms<sup>8</sup> and present a real danger to the population. The women are ready to start fish drying, but the stagnant pools of polluted water prevent the majority from initiating this important livelihood activity.

In Senegal, women farmers are estimated to constitute 70% of the workforce and produce more than 80% of the crops, especially food crops (Chanel Foundation, 2018). With respect to the communities affected by Sendou I, the 2009 ESIA report underscores that women perform a key role in the small-scale family farming occurring on the plots of land surrounding their villages, including on the Sendou I project site (Quartz Afrique 2009: 91). As at October 2019, the agricultural season had passed and the majority of women had been unable to produce crops because their fields have been grabbed and/or flooded by the plant's waste water. This reality, combined with the unaddressed flooding of the fish processing site, has undermined the dual and complementary livelihood activities of women, rendering them and their families indebted and hungry.

Women's health is disproportionately affected because they handle the polluted water and soil in the production, collection, processing and preparation of food. The environmental fallout of Sendou I also impacts on livestock. Some cart drivers and women who raise sheep indicated an increased incidence of livestock death due to the contamination of water and grass. The interviewees emphasised that the installation of the coal power plant has also disturbed the existing system of surface water drainage in the area. This had consequence for the health and wellbeing of both humans and animals.

Takkom Jerry, an environmental NGO, has established that the agreement between the SOCOCIM cement factory owners and the promoters of Sendou I to dispose of the ashes from the coal power plant has not been signed (LSD 2014: 27). Indeed, ashes were visible on the Khelkom site during our field research. It appears that the difficulties CES faced in managing their disposal explain to a large extent why the social action plan includes the construction of a factory to make bricks using residual ash from Sendou I (AfDB 2019: 8).

7 The different forms of pollution include the five-day biological oxygen demand (BOD5), chemical oxygen demand (CDO), nitrogen (N), phosphorus (P) and suspended matter (SM).

8 The Senegalese norm NS 05-061 on wastewater discharge, and the World Bank / IFC guidelines. [https://www.ifc.org/wps/wcm/connect/24e6bfc3-5de3-444d-be9b-226188c95454/PS\\_En-english\\_2012\\_Full-Document.pdf?MOD=AJPERES&CVID=jkV-X6h](https://www.ifc.org/wps/wcm/connect/24e6bfc3-5de3-444d-be9b-226188c95454/PS_En-english_2012_Full-Document.pdf?MOD=AJPERES&CVID=jkV-X6h) [Accessed 06/10/2019]

**Degradation of the vegetation cover**

There is degradation of the vegetation cover due to the pollutants such as heavy metals contained in the dust in the vicinity of the coal power plant. The women we interviewed said this undermined their vegetable gardening in and around the project site and also indicated that this is why tree planting by the promoters of the Sendou project has failed.

**Noise pollution**

Many interviewees living next to the power plant complained about its disturbing noise at night which naturally impacted on their wellbeing.

**Overburdening of the local water network**

The 2009 ESIA did not mention the overburdening of the local water network. It was, however, reported during our field research that the Senegalese Water Authority (SDE) refused, for a lengthy period, to connect the coal power plant to the public water network to avoid water shortages which would impact other consumers.

Our impact assessment reveals that, since the installation of the power plant, the community in Bargny has had extreme difficulty meeting its water needs and can typically only access running water at certain times of the night. Women bear the brunt of these negative impacts because of their responsibility for water provisioning in their families and community. Women who participated in the group discussions indicated that the nighttime water collection results in them only enjoying five to six hours of sleep at night, a factor which undermines their wellbeing.

**Contribution to the climate crisis**

As previously stated, Sendou I will produce considerable greenhouse gas (GHG) emissions estimated at 1 000 Gg of CO<sub>2</sub>-eq. per year, and representing approximately 22.6% of Senegal's total GHG emissions. These calculations exclude the emission costs incurred transporting the projected 400 000 tons of coal from South Africa annually. In its global report on climate change, the Intergovernmental Panel on Climate Change (IPCC) concluded that “[P]oor communities can be especially vulnerable, in particular, those concentrated in high-risk areas. They tend to have more limited adaptive capacities and are more dependent on climate sensitive resources such as local water and food supplies” (IPCC 2007: 9 cited in Dankelman et al. 2008:6-7). Because women are a significant majority of the poorest and most vulnerable groups in the Sendou I project area and well beyond, the gendered impacts of climate change should be taken into consideration when decisions are made about whether to proceed with dirty energy projects such as Sendou I.

Members of the affected communities have criticised the promoters of the Sendou I

project for their failure to develop, share and implement an adequate Environmental Management Plan. This claim has been validated by the development of a revised environmental and social plan by the project promoters in 2016. It is further validated by the BCRM report which concluded that the Sendou I coal power plant project did not fully comply with the AfDB's safeguard policies (AfDB 2019: 2).

Our ecofeminist critique of the Government of Senegal (GOS) and its Sendou 1 co-financiers is that they should not support a coal fired power plant in the 21<sup>st</sup> century. As previously mentioned, the Senegalese government is a member of the Paris Agreement and the AfDB promotes the same agreement in its Second Climate Change Action Plan (2016–2020).<sup>9</sup> By supporting the coal-fired power plant the Senegalese government, AfDB and other co-financiers are destroying the health and livelihoods of communities living near the coal plant. And they are also undermining the global fight to address the ever-mounting climate crisis threatening the very survival of humanity and the planet. We applaud the AfDB's September 2019 announcement that it will no longer directly finance coal projects, however, questions remain about (1) how the AfDB will offer redress to communities that endure the impacts of dirty coal projects it has already financed, and (2) how the bank will ensure that its loans to private banks do not support the onward financing of coal projects.<sup>10</sup>

### Impacts on livelihoods

The people of Bargny have repeatedly pointed out that the artisanal fishing value chain is the main source of income for thousands of their households. In 2014, the number of fishing boats in Bargny was estimated at 512, with catches of about 13 000 tons per year (Green Senegal 2012, cited by LSD, 2014). This represents a considerable contribution (25 %) to the regional economy (BOAD, 2018). In terms of employment, it should be noted that a fishing boat<sup>11</sup> with a surrounding fishing net<sup>12</sup> known locally as *filet tournant* can provide on average 50 jobs (LSD, 2014).

The Khelkom women engaged in fish transformation work with dockers and cart drivers to transport fish crates and sacks of peanut shells used for smoking the fish from the boats to the transformation site. The smoked fish is sold to traders from Mali, Guinea

9 <https://www.afdb.org/fileadmin/uploads/afdb/Documents/Publications/AfricanDevelopmentBank-ClimateChangeActionPlan2016-2020.pdf> [Accessed: 28/09/2019]. In contrast, in 2013 the World Bank banned investments in coal although its financial intermediary loans have circumvented the ban. Civil society pressure is closing this loophole.

10 <https://www.afdb.org/en/news-and-events/press-releases/unga-2019-no-room-coal-africas-renewable-future-akinwumi-adesina-30377> [Accessed 20/09/2019]

11 The length of a traditional boat is between 10–15 metres.

12 A surrounding net is a fishing net which, when pulled along the surface of the water, "surrounds" fish and other aquatic animals on the side and underneath. Source: [https://howlingpixel.com/i-en/Fishing\\_net](https://howlingpixel.com/i-en/Fishing_net) [Accessed 14/09/2019]

and Burkina Faso with a turnover estimated at XOF 3 billion / year (USD 5.1 million / year) (LSD, 2014). The traders usually stay in Bargny for several months to do their business and contribute to the local economy through their various living expenses such as lodgings and the purchase of food. Women noted during an October 2019 field visit that the negative livelihood impacts of Sendou I - being denied access to their agricultural lands, and water pollution in their fish processing sites - are resulting in significantly reduced income and higher levels of debt. This translates to them having a decreased ability to negotiate fair deals with the fish traders from outside of Senegal.<sup>13</sup>

The construction of Sendou I has considerably reduced the space available to women for their fish transformation activities. The impact has been so great that some women have abandoned their activities altogether. Those who continue have experienced a significant reduction of between 30% and 50% on average in their earnings from fish transformation activities. There is naturally collateral damage to the dockers and cart drivers' income who work with them.

To address women's concerns, the promoters of Sendou I have confirmed that the buffer zone remains accessible for all their agricultural, fish drying and smoking activities, and that only housing and commercial buildings are forbidden (BOAD, 2018; FMO, 2017). The promoters have also mentioned that a safeguard decree will be delivered to the affected women to guarantee their right to continue their activities on the Khelkom site (FMO, 2017; BOAD, 2018). Such a decree, it is worth noting, would be in violation of the law. As the women fishers still continue to work in the buffer zone, there is no specific baseline study or analysis of the health and security risks they face (FMO, 2017).

The ESIA report mentioned that the modernisation of the Khelkom site to a budget set at XOF 200 million (USD 400 000) had been planned by the Sendou I promoters and would provide for:

- the delimitation and fencing of the women's work space
- backfilling and electrification
- construction of 15 storages units
- installation of shelters
- equipment for a kindergarten (Quartz Afrique 2009: 88).

Compagnie d'Electricité du Sénégal (CES) made an official commitment to implement this modernisation plan in March 2017 when it signed a Tripartite Agreement<sup>14</sup> with

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<sup>13</sup> The women are selling their fish to these traders at lower prices. They are being forced to provide fish up front with a "deposit" from the traders, who later often abscond.

<sup>14</sup> Source: Protocole d'Accord Tripartite du 02 Mars 2017 entre la Commune de Bargny, CES et SENELEC.

SENELEC and the Commune of Bargny. The implementation of the modernisation plan was confirmed by the AfDB management response (AfDB, 2019) to the report of the Compliance Review and Mediation Unit (BCRM). At the time of our field research in June 2019, the delimitation and fencing of the plant, a small bridge along with two dysfunctional toilets and two containers had been installed in the women's working space as part of the social action plan. By October 2019, some building had started but substantive progress had still not been made.

In June 2019, the president of the Khelkom women explained that the bridge is only being used by the Sendou I coal power plant personnel and trucks, and not by the cart drivers who work with the Khelkom women. As for the containers, they are too small to accommodate all the women fishers' equipment and goods. There is no light and water in the two small toilets that the 1 000 women are expected to use.

With regard to the revolving credit scheme proposed by the CES and the Bargny Municipality for the Khelkom women, the women participants in the group discussions indicated that most of them do not want the credit because they fear indebtedness would only worsen their already difficult lives. While the AfDB management indicated that "as at November 2018, [XOF] 29 million [USD 49 000] had been granted, mainly to Khelkom women" (AfDB 2019: 6), the Khelkom women stressed that only a handful of women who are aligned to the mayor actually benefit from the credit scheme.

### **Social impacts: culture and safety**

The local people's cultural heritage includes a cemetery located between Minam and Bargny, and a sacred baobab tree "banoukhba" where people worship the protective spirits of their villages. The sacred tree is now enclosed in the power plant site and made inaccessible to the community. The local people fear that the cemetery is at high risk of being destroyed during the construction of the power plant's cooling system. This is a threat over and above that posed by coastal erosion.

The participants in the discussions and interviews complained that the impacts of Sendou I on their cultural and social rights was not adequately assessed or mitigated, as evidenced by the fact that the power plant is adjacent to a kindergarten. This matter is not mentioned in the compliance review and audit reports and is a matter of particular concern to women given their assigned social responsibility for the care and wellbeing of children.

None of the Sendou I impact assessment, review and remedial processes, namely the EISA, the compliance reviews, and the environmental and social action plan, address the violence and risks women in the community might confront as a result of Sendou I. These include:

The kindergarten  
Credit: LSD, 2014



- increased presence of construction workers and male staff working at the plant
- increased vulnerability to exploitation
- intra-household gender-based violence due to eroded livelihoods and significant stress in impacted families and households
- deepening social conflict and division about the Sendou I project in the affected communities.

### Indicator 3: Compensation and redress

The following sets out the standards to assess implementation of Indicator 3:

- Provide full compensation and redress in the event that the project harms women in any of these ways:
  - reducing, interfering with or grabbing women's rights to land and natural resources
  - eroding or eliminating women's role in food production and stewardship of natural resources
  - causing gendered violence
  - increasing women's unpaid labour.

### Impact analysis

The detrimental impacts of Sendou I on people's land rights, which define the Lebou culture and their livelihoods, is at the epicenter of their confrontation with the

promoters of the Sendou I project. Since the 2009 public consultation, the former mayor of Bargny contested the location of the Sendou I project site. This was on the grounds that it would encroach on the land parcels and the cemetery, and that this would result in the eviction of community members. The 2009 ESIA identified problems related to:

- the traditional occupants of the Sendou I site being dispossessed of their land
- the problems of people's access to their:
  - sacred sites: a cemetery and two cultural heritage sites
  - working areas: fishing and fish transformation sites.

By September 2017, SENELEC had mobilised an initial amount of XOF 600 million (USD 1 003 860) which was increased to XOF 1 billion (USD 1 890 000) in January 2018 for compensation to the victims of expropriations of the Sendou I project. CES has disbursed USD 13 000 for social investments in the community, such as support to local schools, sports facilities and the community's religious celebrations, all as part of the implementation of the social action plan (AfDB 2019: 4).

In spite of the ESIA recommendations to pay special attention to the land rights of the people affected by the expropriations, and to their existing social values, our field research in June 2019 revealed that these issues remained unresolved. Only 12 people have received financial compensation, and none have been compensated for land expropriation. Women have raised grievances in the complaints lodged with AfDB and other lenders about the lack of adequate compensation for loss of income from agricultural and fish transformation activities (AfDB, 2019; FMO, 2017).

The women we asked about this compensation during discussions and interviews said most of them will not benefit directly from compensation because it would eventually be paid to men in their capacity as heads of their respective families. This is due to the prevailing gender norms in this highly patriarchal setting. Thus, the incomplete Sendou I project compensation process has and will continue to undermine women's right to adequate compensation. This is especially unjust given the particular and devastating impacts of the project on women's subsistence and livelihoods.

The land rights issues caused by the Sendou I project must be considered against the backdrop of accelerating coastal erosion which constitutes a looming disaster for the affected communities. According to the Mr Cheikh Faye, representative of landowners in Bargny, members of the local population have donated land to the municipality since 1995 to support the relocation of victims of coastal erosion. This made it possible for the former mayor to allocate 600 land parcels as part of the Minam I relocation project.

As the 2009 ESIA recognises, land allocations to compensate for coastal erosion have given victims unambiguous property rights (Quartz Afrique 2009: 178). Following the second coastal relocation project (Minam II), the total number of land titles the mayor of Bargny gave to families affected by coastal erosion reached 1 433 parcels. Many remain uninhabited due to people's unwillingness to leave their village. All the parcels have now been enclosed in the Sendou 1 project site. As one respondent interviewed during the field research explained, "It is not only about leaving our homes and land, but most importantly it is about losing the networks of relations that we have established within our communities for generations."

According to the Sendou I project promoters and sponsors, "The mayor allocated these land titles without the full authorisation of the Senegalese authorities" (FMO 2017: 10). Moreover, it has been underlined that "a very small number of the Falsely Promised Plots are in the Site owned by CES; some are in the Security Zone owned by SENELEC" (HSE 2017: 6). The statement is meant to justify the fact that the concerned community members have not been given any type of compensation for the loss of their land, or any proposal for some kind of resettlement. This is in violation of IFC PS 5, among other mandatory norms and standards (FMO, 2017).

The project promoters and sponsors' position overlooks the main issue at stake: their denial of the concerned communities' fundamental rights to land and housing as there are no other land reserves available in the area. As mentioned in the report by the experts mandated by FMO to assess the situation in 2017:

*Young boy sitting on a traditional fishing boat, Bargny.  
Credit: Peter Harrison,  
Waterkeeper Alliance*



*“The families – who are already at risk of losing their houses through coastal erosion had counted on using the hinterland and the land to the side of the community as a place where they could relocate to escape coastal erosion. The development of the coal power plant in its current location has significantly reduced their options for resettlement” (FMO 2017: 8).*

During our October 2019 follow-up field visit, women community members reflected on the impact of coastal erosion on their family life. They talked about a high concentration of people living in a single small house, with up to ten people occupying one room. This is yet another indicator of the social and economic stresses which accompany coastal erosion and the absence of land for the relocation of displaced populations. These stresses impact on women in particular ways because they have to provide food and water and care for significantly expanded households. It is also worth noting that in populations of people displaced by climate change, there is an increased occurrence of violence against women. This is, no doubt, a sensitive but possibly undocumented reality in Sendou.

Our ecofeminist analysis demonstrates that the negative impacts of Sendou I affect the entire local population and specifically people in the artisanal fishing value chain in Bargny, and in the receiving fish markets in landlocked countries such as Burkina Faso, Mali, and Guinea. We need to underline that the negative impacts disproportionately affect the women in Bargny. Many have lost access to the plots of land located in the Sendou I project site where they grew millet, sorghum, groundnuts, gombo and other vegetables for subsistence and income-generating activities.

Their Khelkom processing site is enveloped in the now disputed 500 metre zone over which they have yet to be granted tenure security. And the continued inundation of the site by plant wastewater since January 2019 has destroyed their fish processing activities and associated income for almost an entire year. Whilst compensation for loss and damage of the fish harvest was paid to three women (but not their labour costs), no further compensation has been paid to any women for ongoing loss of income. There has been no effort, as part of a compensation agreement, to extract the stagnant water sitting in the land reserved for fish drying activities. Given women’s central role in food production, processing and preparation, this creates untold social and economic stress and family conflict. The impacts of this have largely been unrecognised and not compensated for.

**Indicator 4: Ecofeminist cost benefit analysis**

**Note:** cost benefit analysis is usually done superficially and biased towards corporate and political interests. Transformed and just cost benefit analysis should embrace the principles of ecofeminism and cross-generational equity, and demonstrate a deep commitment to address the ecological and climate crisis. Ultimately, a cost analysis must include the costs to the planet and human life now and for future generations.

In a just ecofeminist orientation, data must always be disaggregated by gender, age, class and location and must challenge and replace standard corporate point-of-view notions of benefit. These conceal vested interests and hidden costs to the people affected.

**The following sets out to assess implementation of the standards for Indicator 4:**

Undertake a full project cost benefit analysis to inform decisions using these questions as a guide:

- What are the benefits, and who enjoys the benefits at different levels, in different contexts, and over time? Consider:
  - the national, regional, sub-regional and local economies
  - communities immediately adjacent to the project, and those indirectly affected
  - women and men differentiated by class, location, religious and cultural identity
  - future generations.
- What are the costs at different levels, for different people, and over time?
  - Environmental costs may require large government investment to clean up pollution. This drains the fiscus and negatively impacts the provision of other social services. Similarly, rising ill-health of community members living in polluted communities may place great strain on the health system.
  - Large-scale development projects mostly benefit multinational construction, engineering and infrastructure corporations and local businesses rarely benefit. Few jobs are created in a context where land and natural resource-based livelihoods are usually heavily compromised by large-scale projects.
  - What is the cost, both now and into the future, of destroying ecosystems upon which life rests now and into the future?
  - What costs are carried now by this generation and what are the losses in wealth, choice and in a compromised environment and climate for future generations?

- Compare development options: an analysis cannot be defined as one measuring true cost and benefit if it does not assess and compare a number of project / development options which claim to satisfy the same or similar objectives. This would include, for example:
  - different pathways to energy provision or electricity
  - building local economies and supporting livelihoods / work
  - opening people's access to water and market infrastructure.
- Be transparent: open the cost benefit analysis to public scrutiny.
- Involve potentially affected communities, and women in particular, in discussions about costs and benefits. This process should support people measure costs and benefits of different options against their own development aspirations. These may be at odds with large-scale development projects.

### Impact analysis:

Our review of the available documentation permits us to conclude that no cost benefit analysis of the Sendou I project was undertaken. There was no in-depth comparative assessment of the power plant against other energy alternatives that are more socially, environmentally and economically sustainable in the context of a global climate emergency.

*Sendou 1 Coal Power Plant,  
Bargny, Senegal.  
Credit: WoMin, October 2019*



*Leading woman activist in Bargny posing in front of houses damaged by coastal erosion*  
*Credit: LSD*



*Houses impacted by coastal erosion*  
*Credit: LSD*



# 4

## Report conclusions

### Our findings of relevance to the AfDB and civil society organisations

In this section we look at the relevance of our research findings for the AfDB and civil society organisations. We examine the AfDB's response to the environmental and social impacts of Sendou I, and we closely consider the implications of this ecofeminist impact assessment for its gender policy and strategy. This enables us to determine how, and to what extent, the AfDB addresses issues at the interface of women's rights and environmental degradation.

#### Finding:

#### The AfDB's social and environmental policies, procedures and guidelines were not respected

The AfDB has been aware of the existing and potential environmental and social issues raised by the Sendou I coal power plant since the development of the Environmental and Social Action Plan (ESAP) in December 2012 as part of the Sendou I project compliance process (AfDB 2019: 2). This notwithstanding, most of the – in our view, inadequate – corrective measures to address the damage caused to people and the local environment were only taken after the compliance review report by the BCRM in May 2018.

In this regard, the main recommendations of the BCRM report points to critical gaps to be addressed in terms of compliance with the AfDB's own policies and procedures. Of these, notably, the need to:

- align Sendou I with the Involuntary Resettlement Policy (2003), Environmental Policy (2004) and Environmental Assessment Procedures for Private Sector Operations (2000)
- adjust the bank's systems so as to avoid any repetition of violations, particularly through the Environmental Assessment Procedures for Private Sector Operations (AfDB, 2019).

In addition, the Operational Guidelines for Coal-fired Power Plants (2013) requires that special attention be paid to consultations with the local population. But the AfDB had not informed the Sendou I promoters of the requirements set out in its policies regarding (a) appropriate consultations with affected persons and (b) follow up on matters raised during the consultations (AfDB, 2019).

Thus, it came as no surprise that the Sendou I project financiers and promoters had not, in practice, paid attention to the requirement for consultations with the affected people, and women specifically, until the complaints had been filed (AfDB, 2019). In April 2017, a community coordinator was recruited to improve communication with the affected communities and to implement the social action plan. However, the majority of the Khelcom women interviewed during the field research had neither met nor had any interactions with the community coordinator.

Furthermore, the complaints pointed to the failure of the AfDB and other financial lenders to ensure compliance with a number of relevant IFC Performance standards (FMO, 2017). These are:

- IFC PS 1: on the Social and Environmental Impact Assessment, especially with regard to community engagement and consultation processes.
- IFC PS 3 and 4: on pollution prevention and the protection of community health, safety, and security.
- IFC PS 1 and 5: on land acquisition and involuntary resettlement process.
- IFC PS 1 and 6: on the impact on biodiversity.
- IFC PS 1 and 8: on the impact on cultural heritage.

Against this backdrop, the AfDB management admitted “irregularity in monitoring and supervising the project’s environmental and social safeguards aspects by Bank staff due to the very limited number of Bank experts” (AfDB 2019: 12).

*Khelkom women leading the struggle against Sendou I*  
Credit: LSD



## Finding:

## The AfDB's gender policy, strategy and evaluation framework was wholly undermined by the Sendou I project processes

The AfDB's 2001 Gender Policy focuses on five priority areas: education, agriculture and rural development, women's poverty, health and governance (AfDB 2001: 22), with the following goal, objectives and guiding principles:

**Goal:** "The goal of the Bank's Gender Policy is to promote gender equality and sustainable human and economic development in Africa"  
(AfDB 2001: 20).

**Objectives:** "The major objectives of the Bank's gender policy are two-fold: to promote gender mainstreaming in Bank operations and to support Regional Member Countries' (RMCs) efforts to attain gender equality"  
(AfDB 2001: 20).

Guiding principles: for the achievement of these goal and objectives, include gender analysis as "an integral part of all Banks' policies, programmes and projects ...(...)... in order to design interventions which respond to the needs and priorities of both women and men" (AfDB 2001: 20), and "women's economic empowerment (which) will be considered as key to sustainable development" (AfDB 2001: 21).

The AfDB's Gender Strategy for 2014–2018 focuses on gender mainstreaming in its external operations and strategies at the country and regional levels, as well as in its internal policies and processes at the institutional level (AfDB, 2014). The external strategy, which is relevant to Sendou I, builds on three pillars:

- women's legal status and property rights
- women's economic empowerment
- women's knowledge management and capacity building (AfDB, 2014).

Our evaluation of the gendered impacts of Sendou I demonstrates how these run contrary to the AfDB's gender policy and undermine the prospects for both women's economic empowerment and their communities' sustainable development.

The disastrous implications of Sendou I for women's property rights and land tenure security, which violate the AfDB's gender strategy's fundamental pillars, are a basis for major concern. Additionally, the destructive impacts on women's health and livelihoods violate the bank's gender policy commitment to improve women's health. By flouting AfDB's gender policy and strategy priorities, the bank is deepening women's poverty and societal exclusion.

Our impact evaluation has clearly evidenced that the Sendou I project personnel did

not undertake a gender analysis. They did not produce gender disaggregated data – which the AfDB’s gender strategy commits to collecting – to inform project design and implementation. The result of this is that the particular impacts on women have never been identified and / or responded to by the AfDB, the project promoters, or Senegal’s government. Likewise, according to our ecofeminist assessment, the gendered impacts and implications of Sendou I regarding key standards relating to women’s economic empowerment are in violation of the AfDB’s guiding principles.

With respect to the AfDB’s gender evaluation framework, the first round of the gender impact assessment conducted by LSD and WoMin in 2018 has already underlined its inadequacy for projects such as Sendou I (LSD / WoMin, 2018). This second-round assessment, this time from an ecofeminist perspective and contained in this report, confirms this finding.

### **Major concern**

It is a major concern that there is no available evidence of an adequate results monitoring framework that can track key environmental and gender impacts of Sendou I. This aspect was also not addressed in the corrective environmental and social action plan. The AfDB’s management’s response to the BCRM review report only states that “regular project monitoring is now carried out by Bank staff”, and “the Bank’s Safeguards Department uses the monitoring reports to alert the Client and ensure that reported incidents and risks are properly handled in accordance with applicable standards” (AfDB 2019: 12-13).

The BCRM and FMO compliance reviews and independent CSO appraisals have criticised the Sendou I project for the absence of environmental and social baselines. These should have been established before project approval and implementation (FMO, 2017; BOAD, 2018; AfDB, 2019). As underlined by the BCRM, there is no doubt that “[i]n the absence of such baselines, it is impossible to assess impacts and develop appropriate mitigation measures” (AfDB 2019: 12). The complete lack of gender baseline and monitoring data undermines the bank’s ability to measure and monitor project changes which have similar and / or differential impacts on women and men’s rights and livelihoods. This ecofeminist impact assessment underscores the disastrous impacts of neglecting to collect gender-sensitive baseline and monitoring data.

## Finding:

## Ecofeminist analysis raises important critiques of dirty energy and large-scale development projects in a time of ecological and climate crisis

Sendou I has:

- undermined livelihoods and the local economy
- compromised the environment and people’s wellbeing
- eroded community relations and cultural heritage
- been confronted by several very legitimate social protests, complaints, and continuing opposition since 2009.

The ecofeminist impact assessment offers further evidence of the project’s deleterious gendered environmental and social impacts, which had not been identified or acted upon at any point in the project cycle. There are important questions to ask:

- Could many of the impacts – environmental pollution; land encroachments in a densely populated area where relocation land is limited; the erosion of livelihoods, and, over time, the contributions to climate heating – have been mitigated? Could the devastating impacts still be mitigated in some way?
- What is the AfDB, other IFIs, governments and multilateral bodies’ thinking about development and the markers of development success?

Our assessment confirms that the Sendou I coal power plant project, like other dirty energy and large-scale development projects, undermines prospects for the sustainable development of the affected communities. Communities face off dislocations, environmental degradation and compromised livelihoods. At the same time, they suffer the growing impacts of the climate emergency, which is contributing to coastal erosion, increased heat and reduced fish catches. Fossil fuels energy projects, such as Sendou, are central contributors to the climate crisis and should not have been supported or promoted by the AfDB since the scientific links between carbon emissions and climate heating became obvious over a decade ago.

The planning, implementation and monitoring (or absence thereof) of Sendou I undermines the AfDB’s own objectives and guiding principles enshrined in its gender policy and strategy. The AfDB did not comply with its own requirements and procedures regarding its Involuntary Resettlement Policy, Environmental Policy and Environmental Assessment Procedures for Private Sector Operations.

Further, the AfDB with the mandate of “spur[ring] sustainable economic development and social progress in its regional member countries (RMCs), thus contributing to poverty reduction” should be thinking more deeply about the types and scales of development needed to achieve economic empowerment, social progress and poverty

eradication for the majority of the citizens of member countries. Projects such as Sendou I, given its impacts, do not represent success for the AfDB when measured against its mission.

This ecofeminist impact assessment provides a deep critique of Sendou I and its impacts. By association, this is also a critique of all fossil fuels energy, large-scale infrastructure and development projects that are promoted as essential to national development agendas. These projects only create hazardous social and environmental impacts that destroy local economies, drain the fiscus as the state mops up the impacts on health and environment, and foment tensions and conflicts associated with rising poverty and inequality.

Ecofeminism offers a different framework for the analysis of development and its impacts. It looks at development questions from the perspective of the women who are directly and indirectly impacted and it forces a wider and deeper interrogation of dominant development thinking.

### Overarching recommendation: bring ecofeminist perspectives into the AfDB's policy, strategy and evaluation framework

This impact assessment has surfaced and validated substantive concerns. They echo those of the BCRM report and other independent civil society organisations' research about the AfDB's failure to adhere to its own safeguard policies, gender policy and gender evaluation framework. And so the starting point for the AfDB, as it is for other IFIs, is to respect and adhere to its own commitments.

**Recommendation:** as a most necessary step for accountability and transparency, the AfDB should engage in a full community consultation process which includes the Khelkom women, and not only women selected by the local authorities and the project promoters in Bangny. This would allow the AfDB to listen directly to community and women's unmediated views about Sendou I and its impacts, and listen to local people's recommendations for remedy and compensation. At the minimum, there should be full compensation for:

- land rights lost
- livelihoods eroded
- health conditions
- increases in women's unpaid labour burdens
- a range of social stresses.

**Recommendation:** the AfDB should, without delay, take this minimum and necessary step: develop an adequate women's rights – with a strong environmental lens – impact assessment and monitoring and evaluation framework for all projects it

considers supporting. If the AfDB does not have the capacity to support the implementation of its own policies, guidelines and frameworks, including a more comprehensive women's rights impact assessment and monitoring and evaluation framework, then projects should not be approved for funding.

**Recommendation: challenge the AfDB to:**

- consider and share publically what its September 2019 decision to no longer support coal projects implies for established projects that are emitting or will emit carbon which causes climate change.
- consider and creatively address questions of climate debt and remedy.

**Recommendation:** the AfDB should implement cost benefit analysis of proposed projects to fully explore the many costs of large projects against the benefits. Ecofeminist orientations in cost benefit analysis are set out in this report in the standards related to indicator 4.

## The relevance of the ecofeminist impact assessment framework for civil society organisations (CSOs)

A key audience for this report is other CSOs working on large-scale development projects which may or may not be supported by the AfDB and other IFIs. As noted in the first section of this report, an ecofeminist impact assessment framework brings together a focus on women's rights, environment and climate. It asks substantive questions about the costs the dominant development model has left out in project evaluations. The ecofeminist framework tested in our research and presented in this report breaks new ground. We urge other committed organisations to walk alongside us. Let's build and deepen the framework and our ability to reveal the full range of interrelated impacts of large-scale development projects on women and their livelihoods, their bodies and wellbeing, their safety, their unequal gender roles – and, of course – the impact on our environment and climate.

LSD, WoMin and Gender Action largely work on the terrain of extractives, mining, energy, and large infrastructure. The ecofeminist framework and its indicators and standards may be most appropriate for impact assessments addressing these types of projects. We welcome feedback, suggestion and collaboration to deepen this framework and extend its usefulness to other terrains or foci for ecofeminist impact assessment.

Biodiversity losses are occurring at an historically unparalleled rate with species attrition estimated at dozens daily. The planet is in climate crisis and on the brink of catastrophe. All institutions – development banks, private financiers, governments and multilateral institutions – should already be in climate emergency mode. They must withdraw from all dirty energy projects, mega infrastructure and industrial agriculture investments and interrogate the development assumption that economic growth, extractivism, and mega / large-scale projects equals development.

The unravelling of ecosystems, social structures and safety nets, and rising levels of inequality confirm the need for a deep questioning of the dominant development paradigm. This ecofeminist impact assessment framework, its indicators and, in particular, its push for ecofeminist cost-benefit analysis offer us one tool in a new development toolbox needed for the world and its people to survive the economic, social and climate emergency. “Business as usual” development must be overturned if people and the planet are to endure in the coming decades!!

*Khelkom woman  
processing fish on the site.  
Credit: LSD*



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# Annexure 1

## Ecofeminist impact assessment framework

An ecofeminist framework addresses the limitations of gender impact assessments. It brings questions of ecology and climate, women's rights, and alternative viewpoints about development into the evaluation process. In April 2019, LSD, WoMin and Gender Action cooperated to build an impact assessment framework founded on ecofeminist considerations. This framework has four key indicators and a set of standards for each.

### Indicator 1:

#### Consent rights for affected communities and women

The following sets out the standards to assess implementation of Indicator 1:

- Use participatory methods in which women, and all affected peoples, are involved in the processes of research, assessment of potential impacts and the making of informed decisions.
- Ensure full and ongoing participation of women in all key project cycle processes. This includes ongoing monitoring after a project has been put into operation and the provision of safe women-only spaces for them to express their views and perspectives about the project on an ongoing basis.
- Provide complete information about the full range of social, economic, political and environmental impacts on potentially affected community men and women. This should be presented to communities to inform their deliberations about whether the project should proceed or not. See Indicator 2.
- Based on them receiving all relevant and pertinent project information now and in the future:  
Affected community women and men exercise their free, prior and informed consent right to accept or refuse a proposed project which impacts on their rights to land, forests, fisheries, livelihoods, cultural heritage, bodily autonomy and health. Specifically, all people and women specifically, have the right to refuse:
  - the terms of a project proposal
  - the project with or without amendments to project design
  - resettlement to new land and / or homes which do not satisfy their needs and replace for real losses that will be incurred as a result of the proposed project
  - compensation, including monetary payment
  - corporate social responsibility attempts which do not address substantive losses
  - the introduction of toxic chemicals and harmful technologies, including “false solution” technological responses to the climate crisis, that destroy people's health and wellbeing, and negatively impact biodiversity, soil fertility, water quality and increase greenhouse gas (GHG) emissions and the risk of climate change calamities.

**Indicator 2:**

**Women's rights and ecofeminist analysis in project planning, implementation and ongoing monitoring**

The following sets out to assess implementation of the standards for Indicator 2:

- **Map and baseline gendered resource access and control, livelihoods, the gender division of labour and patterns to forecast potentially negative impacts on women in affected communities.**
- **On the basis of the above analysis and the experiences of other similar projects, present the most likely gendered impacts of the project for the following categories, bearing in mind that they are interrelated:**
  - economic (land rights; economic displacement)
  - social (livelihoods; access to energy and drinking water; health)
  - cultural (customs and cultural rights)
  - environmental (air, soil and water pollution; climate change).
- **Pay particular attention to the dominant gender division of labour, including:**
  - the volume of women and girls' unpaid labour
  - the tasks / areas of work in which the above predominates
  - carefully forecasting possible increases in this unpaid care work.
- **Fully evaluate and measure situations where sexual and gender-based violence (SGBV) is likely to occur, and what measures are implemented to prevent it, especially in regard to:**
  - potential SGBV perpetrated by security guards and / or military engaged to guard project sites
  - potential impacts of an influx of male construction workers
  - safety conditions for girls and women's access to water points, energy, latrines, schools and other necessary services
  - mechanisms for redress in regard to SGBV, including providing high-quality healthcare and psychological support for victims / survivors and punishment for perpetrators.
- **Has instituted measures to prevent negative project impacts on women and men within environmental safeguards, including:**
  - risk calculations
  - financial guarantees and provisions for ongoing clean up and / or rehabilitation of land on project conclusion.
- **Has mechanisms to ensure ongoing project monitoring, including mechanisms to gather and act on gender disaggregated data.**
- **Has established processes to address women's specific issues, perspectives and concerns raised throughout the project cycle.**

**Indicator 3:**

**Compensation and redress**

The following sets out the standards to assess implementation of Indicator 3:

- **Provide full compensation and redress in the event that the project harms women in any of these ways:**
  - reducing, interfering with or grabbing women's rights to land and natural resources
  - eroding or eliminating women's role in food production and stewardship of natural resources
  - causing gendered violence
  - increasing women's unpaid labour.

**Indicator 4:**  
**Ecofeminist cost benefit analysis**

**Note:** cost benefit analysis is usually done superficially and biased towards corporate and political interests. Transformed and just cost benefit analysis should embrace the principles of ecofeminism and cross-generational equity, and demonstrate a deep commitment to address the ecological and climate crisis. Ultimately, a cost analysis must include the costs to the planet and human life now and for future generations.

In a just ecofeminist orientation, data must always be disaggregated by gender, age, class and location and must challenge and replace standard corporate point-of-view notions of benefit. These conceal vested interests and hidden costs to the people affected.

The following sets out to assess implementation of the standards for Indicator 4:

• **Undertake a full project cost benefit analysis to inform decisions using these questions as a guide:**

- What are the benefits, and who enjoys the benefits at different levels, in different contexts, and over time? Consider:

- *the national, regional, sub-regional and local economies*
- *communities immediately adjacent to the project, and those indirectly affected*
- *women and men differentiated by class, location, religious and cultural identity*
- *future generations.*

- What are the costs at different levels, for different people, and over time?

*Environmental costs may require large government investment to clean up pollution. This drains the fiscus and negatively impacts the provision of other social services. Similarly, rising ill-health of community members living in polluted communities may place great strain on the health system.*

*Large-scale development projects mostly benefit multinational construction, engineering and infrastructure corporations and local businesses rarely benefit. Few jobs are created in a context where land and natural resource-based livelihoods are usually heavily compromised by large-scale projects.*

*What is the cost, both now and into the future, of destroying ecosystems upon which life rests now and into the future?*

*What costs are carried now by this generation and what are the losses in wealth, choice and in a compromised environment and climate for future generations?*

- Compare development options: an analysis cannot be defined as one measuring true cost and benefit if it does not assess and compare a number of project / development options which claim to satisfy the same or similar objectives. This would include, for example:

- different pathways to energy provision or electricity*
- building local economies and supporting livelihoods / work*
- opening people's access to water and market infrastructure.*

- Be transparent: open the cost benefit analysis to public scrutiny.
- Involve potentially affected communities, and women in particular, in discussions about costs and benefits. This process should support people measure costs and benefits of different options against their own development aspirations. These may be at odds with large-scale development projects.

## Annexure 2

International environment / climate conventions and national laws, implementation decrees and policies legally binding in Senegal

International conventions	Laws / codes	Implementing decrees / norms	Policies / strategies
United Nations Framework Convention on Climate Change (UNFCCC) and Kyoto Protocol	Constitution		
Paris Agreement (COP 21)	Law No. 2001-01 of 15 January 2001 on the Environment Code	Decree No. 2001-282 of 12 April 2001	Sectoral policy letter on the environment; it includes a commitment to promote income-generating activities and collective infrastructure to fight poverty and environmental degradation
Convention on Biological Diversity	No. 96-07 of 22 March 1996 on the transfer of competencies to local communities	Decree No. 96-1134 of 27 December 1996	Biodiversity conservation strategy
International Labour Organization (ILO) Convention No. 120 on Hygiene in Commerce and Offices	Hygiene Code	Decree No. 2006-1252 of 15 November 2006 on minimum requirements for the prevention of certain ambient physical factors	Implementation strategy on climate change
African Agreement on the Conservation of Nature and Natural resources	Sanitation Code	Joint Ministerial Decision No. 009311 of 05 October 2007 on the management of waste oils	
Convention for the Protection of the World Cultural and Natural Heritage	Labour Code	Senegalese Norm NS 05 062 on air quality; norm on emissions and its implementing regulations	
Convention for the Safeguarding of the Intangible Cultural Heritage	Water Code	Senegalese Norm NS 05 061 July 2001 on wastewater discharge and its implementing regulations	
Convention for the Protection of the Ozone Layer and the Montréal Protocol on Substances that Deplete the Ozone Layer			
United Nations Convention to Combat Desertification			

# Annexure 3

International environmental and social norms, national laws, implementing decrees and funders' norms and policies

International norms	National laws / codes	Implementing decrees / norms	Internal norms and policies
ISO 14001: 2004, Environnemental Management System –Requirements and Guidelines for its Use	Constitution		West African Development Bank (BOAD) norms for environmental and social standards (2015)
ISO 14015: 2001, Environnemental Management – Environnemental Evaluation of Sites and Organisms (EESO)	Law No. 2001- 01 of 15 January 2001 on the Environnement Code	Decree No. 2001-282 of 12 April 2001	BOAD operational policy for environnemental and social evaluation
ISO 14031: 1999, Environnemental Management System – Evaluation of Environnemental Performance: Guidelines	No. 96-07 of 22 March 1996 on the transfer of competencies to local communities	Decree No. 96-1134 of 27 December 1996	Netherlands Development Bank (FMO) Sustainability Policy (2011)
ISO 14050: 2002, Environnemental Management System –Glossaries	Hygiene Code	Decree No. 2006-1252 of 15 November 2006 on minimum requirements for the prevention of certain ambient physical factors	African Development Bank (AfDB) Involuntary Resettlement Policy (2003)
ISO 19011: 2002. Guidelines for the Audit of Quality and Environmental Management Systems	Sanitation code	Joint Ministerial Decision No. 009311 of 05 October 2007 on the management of waste oils	AfDB Environmental Policy (2004)
ISO 31000: 2009, Risk Management	Labour Code	Senegalese Norm NS 05 062 on air quality: Norm on emissions and its implementing regulations	AfDB Environmental Assessment Procedures for Private Sector Operations (2000)
IFC Performance Standards (2006)	Water Code	Senegalese Norm NS 05 06 01 July 2001 on wastewater discharge and its implementing regulations	AfDB Operational Guidelines for Coal-fired Power Plants (2013)
World Bank Environmental, Health and Safety General Guidelines (2008)			
OECD Guidelines for Multinational Enterprises (1976)			
UN Guiding Principles on Business and Human Rights (2011)			

*Women at the Khelkom site with  
Sendou 1 in the background  
Credit: LSD*

