Environmental Assessment of Kuldispingh Port Facility, N.V. Paramaribo, Suriname

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Cover Photo courtesy of Kuldipsingh Port Facility, N.V.

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Limitations

This report, including all conclusions and recommendations, is based on the work performed as described herein. Net Gain Ecological Services, LLC (NetGain) reserves the right to revise this report, including its recommendations, if and when additional information becomes available. NetGain investigated specific issues relevant to the objectives of this Project. It is recognized that the scope of services performed during this work may not adequately address the needs of other users, and any reuse of this report or the findings, conclusions, or recommendations presented herein is at the sole risk of the user. We have made a reasonable effort to accurately and completely assess all aspects of concern as identified in the scope of work. If there are perceived omissions or misstatements in this report regarding any aspect of our work, we ask that they be brought to our attention as soon as possible, so we have the opportunity to address them.

COVID 19 NOTE: Due to the global COVID-19 pandemic, several adjustments were made to the standard scope of work for an Environmental Assessment of this nature to ensure the health and safety of NetGain staff and subcontractors as well as staff of the InterAmerican Investment Corporation (IDBI) and IDBI's client. In particular, travel to the Project site for NetGain staff from the U.S.A was not possible. Instead, NetGain's subcontractor in Paramaribo, Suriname, Ms. Nancy Del Prado conducted site visits and public consultation activities in accordance with local COVID-19 guidelines and restrictions. We remain available for a site visit in the future should COVID-19 pandemic conditions improve.

Scope of Work and Objectives

NetGain has been retained by IDBI to conduct an environmental assessment of Kuldipsingh Port N.V. in Paramaribo, Suriname. NetGain has teamed with Ms. Nancy Del Prado, LLM to complete this work. The work presented in this report was conducted in the following tasks:

- Task 1—Review existing documents and background information and conduct interviews with KPF staff. NetGain provided an initial document request focusing on the following categories of information:
    - Current Port operations and operations following proposed improvements;
    - A description of proposed facility improvements;
    - Description of any associated facilities;
    - Organization chart for KPF with descriptions of roles and responsibilities of key personnel;
    - Organization and description of environmental, health, and safety (EHS) functions; and
    - Policies and procedures related to EHS, emergency preparedness and response, labor, security, and community health and safety.

Annex A presents an inventory of documents reviewed by NetGain in developing this Draft report. Following the initial review of documents, NetGain submitted follow-up questions and engaged in weekly conference calls with KPF and IDBI staff. Ordinarily, the scope of work for an environmental assessment would include a site visit; however, due to public health restrictions imposed as a result of the Covid 19 pandemic, NetGain staff were unable to travel to Suriname. On behalf of NetGain, Nancy Del Prado conducted a preliminary site visit (drive through) on July 8, 2020 and a subsequent formal site visit and interview with key KPF staff on August 4, 2020. During the formal site visit, Ms. Del Prado met with the following KPF staff: Vinood Ramkhelawan, General Manager; Kavita Ramdjielal, Health, Safety, Environment and Quality (HSE-Q) Supervisor; Marcel Sporkslede, Head of Operations; and Verna Garconius, Port Facility Security Officer (PFSO). The visit with KPF staff was conducted as a video conference with additional participation of NetGain (Pieter Booth) and IDBI (Susana Carolina Dousdebes Cordova, IDBI Environmental and Social Officer, and Nawien Ghisiawan, IDB Investment Management Officer). Annex B presents a site visit report prepared by Nancy Del Prado.

- Task 2—Prepare a Draft and Final Environmental Assessment Report. NetGain assessed information gained in Task 1 relative to IDBI and other relevant policies, standards, Suriname national and local environmental regulation, and guidelines and performed a high level assessment of perceived project risks, potential actions to mitigate the risks, and potential information gaps to assist IDBI in better focusing their Environmental and Social due diligence (ESDD) efforts. A draft report was submitted to IDBI for review on September 4, 2020.
- Task 3—Plan for and participate in a Public Consultation. Due to the Covid 19 pandemic, this task was conducted as a video conference held in KPF offfices. Nany Del Prado facilitated the consultation on behalf of NetGain. The activities conducted under this task included the following:
    - Participate in conference calls with IDBI, and KPF to identify stakeholders and prepare the scope and agenda for public consultation;
    - Coordinate, and facilitate the public consultation; and
    - Develop a report on the public consultation (Annex C).

The conclusions and recommendations presented in this report were based on an information provided by KPF, the site visit, interviews with key KPF staff and assessment of the information and information gaps relative to local Suriname laws and regulations and the following principal lender standards:

- IDBI Environmental and Social Sustainability Policy (2013);

- International Finance Corporation (IFC) Performance Standards (PS) on Environmental and Social Sustainability[1];
- IFC Environment, Health, and Safety (EHS) General Guidelines (IFC, April 2007a);
- IFC EHS Guidelines for Ports, Harbor, and Terminals (IFC 2017); and
- Good International Industry Practices (GIIPs) invoked by reference in the forgoing documents.

In addition, we performed a high-level assessment of available information relative to the following IFC guidance notes and handbooks:

- IFC Guidance Notes: Performance Standards on Environmental and Social Sustainability including the IFC Guidance Note 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets; and
- Good Practice Note: Addressing Grievances from Project-Affected Communities.

Project Description

The Kuldipsingh Port Facility (KPF) in Paramaribo, Suriname is one of 11 companies in the Kuldipsingh Group of Companies, including subsidiaries in the construction, concrete, oilfield services, and other fields. KPF was founded in 2015 and is certified by the International Ship and Port Facility Security Code. KPF is a non-governmental landlord and property owner. The Port is located on the Suriname River approximately 3 km. upstream of the Jules Wijdenboschbrug Bridge in Paramaribo.

KPF employs 20 persons with the following distribution: 9 work in the office on administrative tasks; 11 work in the Operations Department; there is one technician; and there are three janitorial staff. For each vessel that moors at the facility between 20 and 80 stevedores are employed. Stevedores are employed as contract (casual) laborers who are paid on a bi-weekly basis.

The physical layout of the facility includes (Figure 1):

- Deck load capacity of 6,160 M^2 of 5 metric tons (MT) and 4,455 M^2 of 10 MT;
- Total berth accommodation of 397 meters;

[1] The most current versions of PS policy and guidance documents can be found at https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/Performance-Standards

- Open storage area of 9 hectares (Ha) available for logs and steel pipes;
- Covered storage of 0.9 Ha for storage of cement, lime, and rice;
- Warehouse of 4,500 m^2 plus 1,675 m^2 for general cargo;
- Open area of 12,600 m^2 for containers; and
- Jetty area of 15,600 m^2.

The types of cargo handled by the port include, but are not limited to:

- Break bulk and lift-on/lift-off (LOLO);
- Heavy cargo (e.g., industrial and construction equipment);
- Logs for export;
- Pipe for the oil and gas industry; and
- Pre-cast concrete product export.

The following equipment is available for port-related activities:

- Two 45-Ton reach stackers;
- 15-Ton forklift trucks;
- Three 5-ton forklift trucks;
- Two 3-ton forklift trucks;
- Three Terberg trailers; and
- Nine 40ft MAFI trailers.

Figure 1. General Layout, Kuldipsingh Port Facility, Paramaribo, Suriname.

The Project is intended to support the immediate and medium-term growth plans including:

- Complete 45 meters expansion of the jetty before the end of 2020;
- Install shore and gantry cranes to handle container vessels;
- Install in-plug facilities for approximately 100 containers;
- Expansion of office and warehouse space for rent by KPF customers; and
- Incrementally convert the log storage area to storage of materials and equipment to support offshore oil and gas exploration and development.

NetGain understands that there is a maintenance facility on KPF property that is owned and operated by the Kuldipsingh Group and that KPF have some equipment maintained and repaired at that facility. The maintenance facility might be considered an *Associated Facility* for the purposes of risk and impact assessment and IDBI's due diligence process. An Associated facility is defined as a facility that is not funded as part of the [IDBI] Project and that would not have been constructed or expanded if the project did not exist and without which the project would not be viable.

Recommended Environmental Categorization and Rationale

IDBI conducted a site visit and interviews with KPF personnel on November 20, 2019. Based on the information provided during the site visit, IDBI came to the preliminary conclusion that the Project "would generally fall within a Category B Project". During the site visit, IDBI noted the following positive aspects of the project:

- The Project consists of a brownfield expansion of an existing facility;
- The Project is about 700 m upstream from the country's main public port facility on the Suriname River;
- The port is part of an existing industrial area that includes a petroleum refinery;
- The proposed expansion does not require the relocation or the economic displacement of any families;
- The general site is well maintained, and visual observation indicated well established health and safety (H&S) practices;
- The land for the port facility is privately owned by the Kuldipsingh Group;
- There seems to be no interference between the proposed expansion and protected areas or areas of environmental significance; and
- The port project has acquired land around the facility and established a forested buffer zone.

NetGain is in general agreement with the preliminary observations above and with the proposed categorization of the project as Category B:

> *Business activities with potential limited adverse environmental or social risks and/or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures[2].*

Environmental Context and General Social Setting

ILACO (2019)[3] prepared an Environmental and Social Impact Assessment (ESIA) for the proposed KPF Waste Management Plant (WMP). As indicated by the title of the ESIA, the proposed WMP plant would be located on

[2] IFC. 2012. Interpretation Note on Environmental and Social Categorization (https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_policy_interpretationnote-categorization)

[3] ILACO. 2019. Environmental and Social Impact Assessment (ESIA) for the Kuldipsingh Port Facility (KPF) Waste Management Plant.

KPF property. ILACO (2019) presents a discussion of environmental and social baseline conditions in the vicinity of KPF. This information is summarized here.[4]

Physical Environment

The Project area has a tropical humid forest climate with mean annual air temperature at Paramaribo of 27º C (± 9-13 ºC) and annual precipitation of 2,076 mm to 2,177 mm. Suriname experiences two wet and two dry seasons with the long wet season from approximately May to July.

ILACO (2019) collected ambient air quality measurements during the rainy season (January-February 2019 and April-May 2019) and the dry season (March-April 2019) at various locations near the KPF WMP Site**.** Samples were analyzed for NO_2, PM_1, $PM_{2.5}$, PM_{10}, and Total Suspended Particulate (TSP). At all locations, NO_2 concentrations are considered to be low. The highest hourly average value reported was 31.9 ug/m^3 as compared to the World Health Organization (WHO) standard of 200 ug/m^3. Particulate measurements can be considered to be low to moderate. PM_{10} and $PM_{2.5}$ were consistently lower than the corresponding WHO guideline for 24-hr. 99th percentile values. ILACO (2019) reported that on April 27, 2019, PM_{10} reached a peak 24-hour mean value of 80 ug/m^3 and $PM_{2.5}$ reached a peak 24-hour mean value of 78.91 ug/m^3 as measured at a residence (receptor) along Sir Winston Churchillweg; however, the 24-hour mean values were all well below the WHO guidelines[5]. The proposed WMP site on KPF property is located in an industrialized area with several nearby businesses with active emissions, including the Statsolie refinery. Most other sources of air emissions are associated with dust and include Kuldispingh Ready Mix (cement company), Argos (cement company), and Ingas (industrial gases), as well as traffic along Sir Winston Churchillweg. The abovementioned companies are all located predominantly upwind of the nearest residential area and the nearest resident to the KPF site is approximately 400 meters from the port.

ILACO (2019) conducted ambient noise monitoring in the vicinity of KPF, including at the location of nearby receptors (residents). Daytime measurements at the nearest receptor location (across from KPF) were all below the IFC/WHO guideline of 55dBA for residential areas in the dry season but were exceeded in the rainy season reportedly due to heavier truck traffic on Sir Winston Churchillweg. Nighttime measurements were above the WHO/IFC standard of 45 dBA for residential sites but below the standard of 70 dBA for industrial sites, for both the dry and rainy season measurements.

Soil and groundwater were sampled by ILACO (2019) on the proposed waste management facility location; which is primarily in the location of the current log storage area (see Figure 1). Eight (8) soil samples were

[4] As of this writing, the proposed WMP had not been fully reviewed nor had it received government approval. Should the WMP Project move ahead, and if it is determined that the WMP is an Associated Facility, all appropriate plans, and programs of the KPF ESMS will have to extend to the WMP.

[5] Note that Figure 33 of ILACO (2019) is mislabeled and what is plotted is the peak 24-hour mean value presented in Table 17.

taken and revealed a variety of fill material (gravels and sands) placed over native clays, with typical thicknesses of fill of 60 cm to 125 cm. Some organic constituents (phthalates) were detected at concentrations above background, but below the intermediate and intervention levels (Dutch guideline values for soil). No foreign objects or signs of petroleum contamination were observed. Groundwater samples from two wells were analyzed for metals and selected organic chemicals. Arsenic was the only metal detected at a concentration above the intermediate value. Although arsenic is a crustal element and is expected to be ubiquitous in the environment, the reported value was considered as representing moderate contamination. Phenol and dichloromethane exceeded the intervention value in one well, but by less than a factor of two.

KPF is located in an area that contains 5 primary canals that drain the surrounding low-lying areas. The canals are designed to drain excess stormwater as well as domestic and industrial wastewaters into the Suriname River. The KPF facility consists of paved and unpaved areas, with most of the unpaved area being in the log storage yard. Drainage systems that are both closed to the Suriname River (by tide gates) and open (e.g., open ditches or canals) serve to manage stormwater at the site. ILACO (2019) sampled surface water from two locations: one location in the Suriname River to the northwest of the jetty off the log storage yard, and one in the Tout Lui Faut Canal to the southeast of the facility. Results were reported for the following constituents: pH, barium, zinc, toluene, xylenes, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, 2,4-dimethylphenol, phenanthrene, diazinon, and total petroleum hydrocarbons (sum C10-C40).. Of the 11 constituents reported, screening values were presented for just three (pH, zinc, and diazinon). With the exception of diazinon at the sample location in the Suriname River in the rainy season, all constituents were below criteria deemed acceptable based on human and ecological risk (United States Environmental Protection Agency criteria for drinking water and aquatic life criteria for surface were used). Diazinon exceeded the criterion for aquatic life by a small margin. The laboratory reports indicated that both holding times and sample temperature were exceeded; however no conclusions were presented by ILACO (2019) regarding the potential limitations of the use of the data.

Living Resources

ILACO (2019) presents no baseline information on the flora and fauna present at the KPF site and its immediate surroundings, including the Suriname River, and there was no assessment of biodiversity or critical habitat. KPF is located within the riparian corridor of the Suriname River that has been historically altered and converted to industrial use. This industrial corridor is bordered by a mix of residential, commercial, and light industrial uses with agricultural land uses farther from the river. There is no riparian vegetation remaining on the KPF facility or on properties immediately adjacent to KPF. A property recently acquired by KPF that is located to the southwest of the log storage yard is vegetated with what appears to be early successional secondary forest; however, due to the inability to conduct a site visit, the status of this area could not be verified. At most, this property represents a fragment of highly modified habitat that is distantly isolated from higher quality habitat and with no corridors linking it to the nearest high-quality habitat. There are no protected areas upland or associated with the Suriname River within the likely area of influence of KPF activities.

KPF has not performed biodiversity or habitat surveys on newly acquired properties or on shoreline/riparian areas where the jetty expansion has taken place. Examination of historical satellite images available on Google Earth® indicate that some riparian vegetation and intertidal habitat was converted during jetty construction as well as conversion of some vegetated uplands by filling activities (see Figure 2).

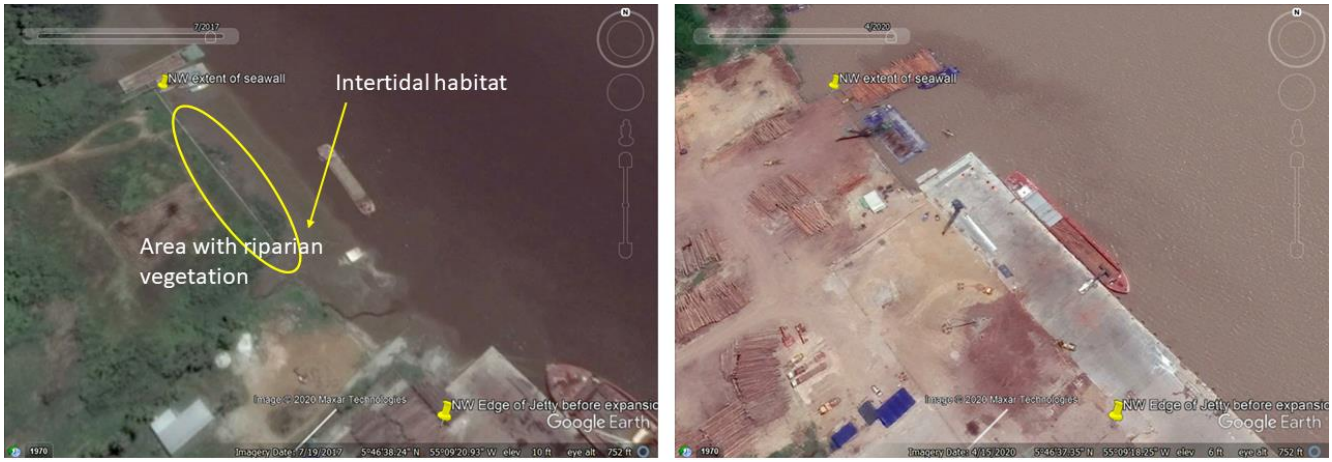


Figure 2. Satellite images showing the presence of intertidal and riparian habitat (July 2017; left) and conversion due to jetty construction (April 2020, right).

Compliance with Regulations

KPF activities are covered by the following permits, licenses, and guidelines:

- Presidential Resolution no. 2019/RP (March 29, 2016) for the authorization of the KPF jetty as a permanent unloading or loading facility for vessels and for temporary storage;
- District Commissioner's license No. 1882/10 (12 April 2011) to Kuldipsingh Total Concrete N.V. Prefab Division for the construction of a concrete quay at KPF and conditions for the construction activities;
- District Commissioner's license No 2294.17 (19 Dec 2019) to KPF for the expansion of the jetty to 440 meters in accordance with the submitted drawing and subject to the following conditions:
    - All shipping regulations must be complied with;
    - It is strictly prohibited to allow oil, oily ballast water, or oily bilge water to enter the waters;
    - The quay must be properly illuminated from sunset to sunrise and such illumination must not be an obstacle to the navigation of ships;
    - The quay must be equipped with primary waste reception facilities;
    - All environmental regulations must be complied with;
    - The quay and quay furnishings must always be in a good state of maintenance;

- Vessels must be properly moored at all times;
- Instructions imposed by the Harbor Master pursuant to Article 13 of the Decree on Port Services 1981 (S.B. 1981 no. 86) must be complied with;
- Construction will take place in consultation with and on the instructions of the Civil Engineering Directorate of the Ministry of Public Works; and
- Activities may be carried out up to a maximum of 20 (twenty) meters from the quay, since the navigation channel will be only 120 (one hundred and twenty) meters away from the quay. Vessels may not be moored or tied alongside other vessels because of possible waves from passing ships.

- Shipping Notice 2018/3 (June 8, 2018) from the Maritime Authority of Suriname specifying requirements for ships to navigate alongside the Kuldipsingh facility; and
- Statement # 19 (July 29, 2019) of the Port Security Certificate issued by Maritime Authority Suriname. Statement issued under the rules for maritime security and Part B of the International for the Security of Ships and of Port Facilities (ISPS Code), which among other things requires a security policy, designation of roles and responsibilities, conduct of a Port Security Assessment and development of a Port Security Plan, infrastructure and personnel to ensure physical security of the Port, and security awareness and raining.

The National Institute for Environment and Development in Suriname (NIMOS) is currently the principal national authority for environmental management in Suriname. NIMOS' mission is to initiate the development of a national legal and institutional framework for environmental policy and management in the interest of sustainable development. Among its duties, NIMOS issues guidance on Environmental and Social Impact Assessments (ESIAs) and is tasked with the review of ESIAs. NIMOS also advises on the screening decision and scope of ESIAs.

The Environmental Framework Act (S.B. 2020 no. 97; EFA) establishing the NMA was promulgated in May 2020. As of the time of this writing, there was little indication that the NMA had become operational. Until then, NIMOS will continue being responsible for environmental governance. For the Environmental Framework Act to be fully operational, a set of subsidiary legislation will need to be promulgated, most of which is already in draft form (see below).

The most important provisions in the EFA related to KPF activities are:

1. The duty of care—Whereby every citizen has a general duty of care regarding the environment, including refraining from acts or omissions that have adverse consequences for the environment.
2. Environmental and Social Impact Assessment—Although the ESIA process has been administered by NIMOS since 2005, with the promulgation of the Environmental Act it becomes mandatory. EIA Regulations have already been drafted and will immediately take effect after promulgation. Expansion

of Ports are activities for which an ESIA is required. As the expansion activities have already taken place, and the permit for expansion has already been granted, it is not expected that an EIA will be required for KPF expansion activities.

3. Pollution and standards—Environmental norms and standards will be developed under the framework law. This will be executed through implementation regulations. This includes the application of environmental permits and the rehabilitation of affected areas. The pollution regulations regulate the determination of contaminants, Maximum Allowable Concentration (MAC) values for release of contaminants and procedures for the rehabilitation of contaminated areas. Pollution regulations have already been drafted. KPF will have to apply for an environmental permit when these regulations are promulgated.
4. Waste and hazardous substances and emergency plans—The NMA will determine norms and procedures for handling of waste (collection, transportation, storage, and transfer) and may, among other things, prohibit the import or export of any waste. Furthermore, the NMA can prohibit hazardous substances or impose procedures for the import, export, safe storage, handling, transport, use and disposal. These procedures are part of a permit for hazardous substances. KPF will have to register its storage, handling and transport of hazardous substances and apply for a hazardous substance permit when regulations are promulgated. Furthermore, the NMA is authorized to require an emergency response plan for storage, use and transportation of contaminants, waste, or hazardous substances. KPF will be required to have an emergency plan in place. Regulations have already been drafted.
5. Environmental Audits—The EFA provides for the establishment of guidelines and procedures for conducting an audit. These Guidelines had not been prepared as of this writing.

KPF will be required to comply with the provisions of the EFA as they develop.

KPF has applied to become a signatory to the International Cyanide Management Code. A letter dated 16 July, 2018 acknowledging receipt of the application was provided to NetGain as part of this review. However, no additional information regarding the status of the application was provided. Interviews with KPF staff indicated that KPF handles sodium cyanide product under operational procedures provided by their client(s).

During staff interviews, KPF indicated that the company has not been sanctioned or fined due to failure to comply with environmental regulations.

Environmental Risks and Impacts and Proposed Mitigation and Compensation Measures

This section of the report presents a summary of the information reviewed and our general assessment of KPF compliance with IFC PSs and other applicable guidance, international standards, and GIIP. The scope of this environmental assessment, by definition, does not include assessment of compliance with several PSs and only assesses others to the extent there is overlap with environmental-related PSs as follows:

- PS1 Assessment and Management of Environmental and Social Risks and Impacts—Formally assessed for environmental impacts with some observations on key social aspects to the extent these significantly overlap with environmental risks and impacts;
- PS2 Labor and Working Conditions—Not formally assessed, but some observations are provided;
- PS3. Resource Efficiency and Pollution Prevention
- PS4 Community Health, Safety, and Security—This PS was assessed only to the extent it significantly overlaps with PS1 and PS3;
- PS5 Land Acquisition and Involuntary Resettlement—Not assessed. We understand from the documents reviewed and interviews with KPF staff that land acquisition has been from private parties and has not involved any involuntary resettlement;
- PS6 Biodiversity Conservation and Sustainable Management of Living Resources—Formally assessed;
- PS7 Indigenous Peoples—Not assessed; and
- PS8 Cultural Heritage—Not assessed.

In addition to the document review, NetGain participated in a site visit and personnel interviews and facilitated a public consultation. Annex B presents a report on the site visit and Annex C presents a summary of the Public Consultation. Both were attended by Nancy Del Prado, LLM who was under contract to NetGain for this work. Following are summaries of these activities:

- Site Visit— A site visit to KPF was conducted on August 4, 2020 with the objectives of conducting a physical tour and information exchange through interviews with key staff. IDBI and NetGain staff who could not be physically present were able to participate via a real-time drone tour and via video conferencing. Follow-up questions and document requests were submitted to KPF and KPF submitted responses.
- Public Consultation—A videoconference consultation was held at the KPF facilities on August 6, 2020. The public was notified of the consultation via an announcement and invitation published on July 29, 2020 in the *De Ware Tijd* newspaper. During the consultation, participants were informed about the aim of the project, the potential environmental effects resulting from the expansion of the port facilities as well as the intended measures to avoid or mitigate potential effects. In addition, a description was provided of the Grievance Mechanism to be developed and to which the community can turn with its questions, complaints, suggestions, and requests for information. After the presentations, the participants were given the opportunity to raise questions about what had been presented. Kavita Ramdjielal HSE-Q Supervisor at KPF, and Nancy Del Prado and Pieter Booth of NetGain addressed the questions, which were registered at ANNEX C. There was a total of 18 participants in the meeting, consisting mainly of representatives of the relevant Government actors such as NIMOS, the Maritime

Authority, the President's Office, and the District Commissioner. The rest of the participants were private sector stakeholders from companies in the industrial corridor.

PS 1. Assessment and Management of Environmental and Social (E&S) Risks and Impacts

KPF has not prepared an Environmental and Social Impact Assessment (ESIA) for the Port expansion Project, and none was required by the NIMOS at the time NIMOS issued an environmental permit for construction. KPF has applied for and received ISO Certificates of Registration under ISO 9001:2015 and ISO 14001:2015 (both received April 5, 2019) and ISO 45001:2018 (June 15, 2019). KPF was audited on December 13, 2019 for ISO 14001 on December 16, 2019, and for ISO 45001 on December 18, 2019. The following non-compliances were noted in each audit:

- ISO 9001 and ISO 14001—There was no evidence of monthly or weekly meetings in 2019 and there were no awareness sessions held in 2019
- ISO 45001—There were no awareness session for staff in 2019 and no consistency, no awareness session regarding internal and external communications regarding the quality management system, and there was no evidence of fire drills.

The Company organization chart is presented as Figure 3. The HSEQ Supervisor reports directly to the Manager.

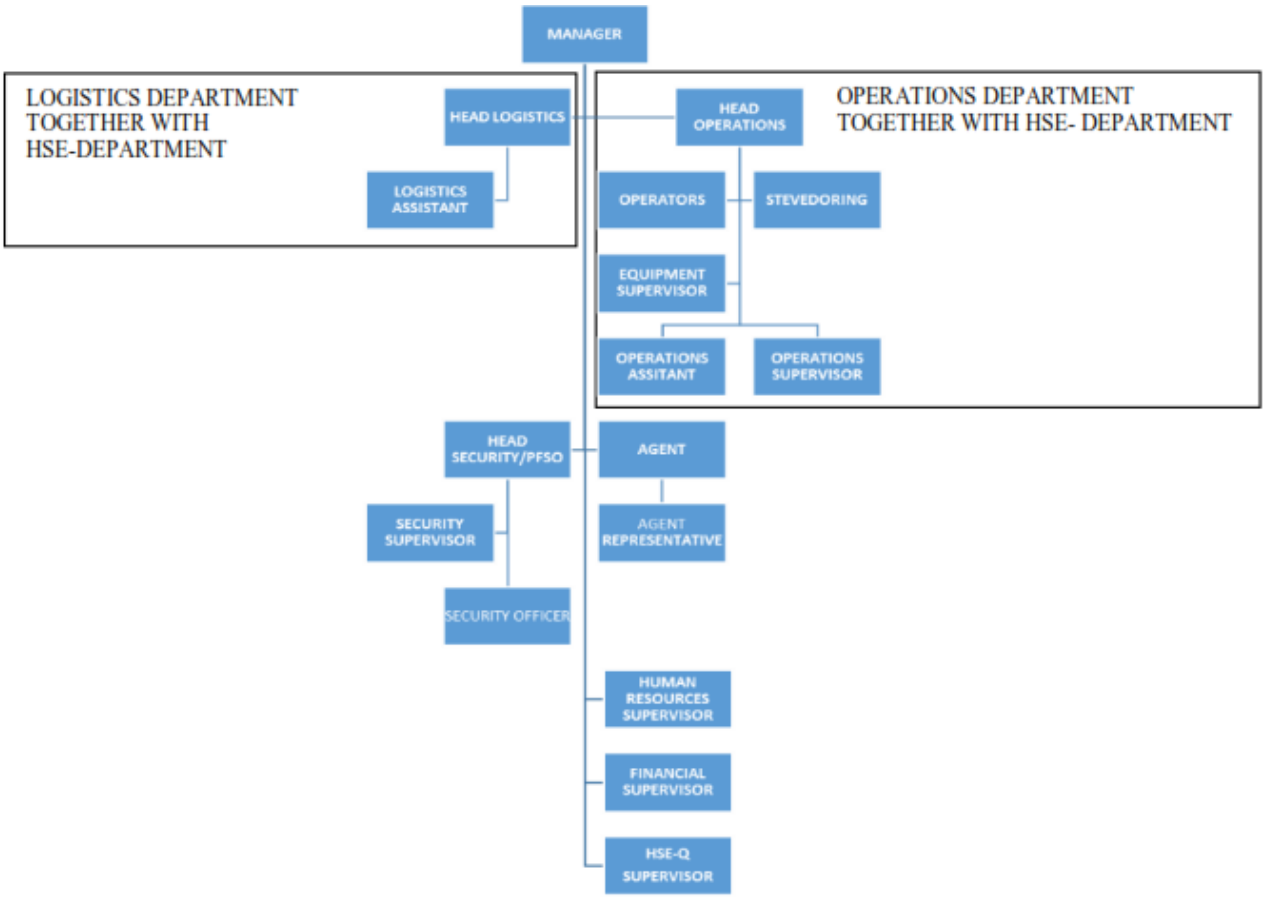


Figure 3. KPF Organization Chart.

KPF provided NetGain with a three-page document presenting an environmental impact assessment matrix for the jetty expansion portion of the Project. The matrix assesses the overall significance of impacts as low. medium, or high based on the expected severity and probability. Nuisance due to pile driving was the only impact to be rated as high, but with occasional frequency. Increased use of water, increased process waste water, and hindrance caused by equipment to local community were rated as medium severity impacts. No detailed assessment was provided as backup to the impact assessment matrix.

There is a single person in charge of all EH&S responsibilities for KPF and that position does not have direct reports other than Supervisors. KPF does not have a formal Environmental and Social Management System (ESMS); however, the Company has developed numerous policies, plans, programs, and procedures addressing a wide range of risks associated with the particular Port operations as well as specialty hazardous cargo. Among these is a *Health, Safety, Environmental, and Quality Policy Statement.* Health, safety, and environment is listed as one of 5 core values of KPF. The other core values are Collaboration and Empowerment, Excellence, Customer Focus, and Sustainability. No additional documentation was presented by KPF that describes the elements of each core value in detail nor how the core values will be upheld. In addition, there is no indication that KPF

undertook a global assessment of the source and relative magnitude of risks or developed a global system for risk management and mitigation such as would be provided by a formal ESMS.

KPF provided NetGain with risk-based assessment forms for ranking job activities by likelihood and severity of an event for several activities. For each activity or job, the risk-based assessment form provides a description of the hazard and the effects, then ranks the activity in terms of severity (low, medium, or high) depending on the product of the joint ranking of severity and probability. Risk-based assessment forms have been prepared for the following activities:

- Bulk transfer of fuel;
- General activities;
- Handling and storage of chemicals;
- Handling and storage of waste;
- Loading and unloading of vehicles-goods;
- Loading and unloading of vessels; and
- Loss of control (of vehicles).

The risk-based assessment forms are numbered, dated, and signed as approved by the General Manager.

In addition to the risk-based assessment forms for the above activities, KPF has prepared the following procedure documents:

- Confined space entry—Defines and describes the activity, identifies equipment and procedures to be used, and requires completion of a confined space entry permit form authorized by a supervisor. NetGain did not receive any completed permit forms to review, nor were any requested, as this was not a focus of this EA.
- Crew Change—Presents a flowchart of steps required for immigrations and customs for ship crew changes
- Discharging and Transport of Ammonium Nitrate—Requires notification of responsible personnel, documentation of stowage plan and manifest, requires a meeting to discuss procedure details including unloading equipment and method and use of PPE, and outline of procedures in the event of a spill of material.
- Fatigue Management—Presents a basic flowchart for causes of and preventative management measures related to fatigue and outlines responsibilities for fatigue management.
- Incident Investigation—Presents a flowchart for notification, hazard identification and assessment, and evaluation and recordkeeping and lists responsibilities.

- Lifting—Presents procedures for developing and implementing a lift plan including major elements, responsibilities, toolbox meetings and approvals of a lift plan. The purpose of this procedure is to ensure that competent and qualified personnel use the correct equipment in a safe manner.
- Permit to Work System—Presents procedures for non-routine and/or potentially hazardous work performed by an employee or contractor in all KPF controlled areas and is intended to provide a common understanding between KPF management, employees, and contractors on the performance non-routine work. Requires a job hazards analysis and approval of a work permit prior to engaging in the work. The permit to work system is intended to cover the following activities:
    - Bunkering;
    - Hot work;
    - Confined space entry;
    - Bulk transfer;
    - Electrical work;
    - High Voltage work;
    - Excavation and Penetration;
    - Working at Height / Over the Side;
    - Abrasive Blasting and Spray Painting; and
    - General Work Permit for any other non-routine potential hazardous work.

  Evidence of implementation of the Permit to Work system was provided for an oil and gas project (the *Kosmos* Project) performed in 2018. The Permit to Work system is not implemented for routine Port operations that are not considered potentially hazardous.
- Quicklime—Presents procedures for the safe unloading and transport to storage facility, and storage of quicklime. Requires notification and involvement (toolbox meeting) for operations supervisor, equipment foreman, and safety/security department. Provides general procedure for unloading of bags and conditions for the storage area.
- Sodium cyanide-- Presents procedures for the safe unloading and transport to storage facility, and storage of sodium cyanide. Requires notification and involvement (toolbox meeting) for operations supervisor, equipment foreman, and safety/security department. Provides general procedure for unloading of bags and conditions for the storage area. In the event of a spill, requires evacuation of the entire port, notification of the emergency team, notification of client and hazmat team, and adherence to client's emergency plan.

The procedure documents are assigned a procedure name, number, owner, developer, approval date, and are indicated as approved by the General Manager.

In terms of hazardous material/chemical tracking, KPF tracks quantities handled by vessel, date, numbers of containers (e.g., bags), and tonnage. The following documents were provided by KPF:

- Quicklime data 2016-2020—Listing vessel, arrival date and tons of product;
- Ammonium Nitrate data 2020--Listing vessel, arrival date, and kg of product; and
- Sodium cyanide data 2020—Listing vessel, arrival date, and kg product.

Quicklime is a strongly alkaline material that poses potential human hazards including severe skin and mucous membrane damage.

Ammonium nitrate and sodium cyanide are highly reactive chemicals. Ammonium nitrate is a strong oxidizer and when contaminated with oils or other hydrocarbons, charcoal, or other organic materials is capable of detonating when exposed to combustion or explosion of adjacent materials. Ammonium nitrate is incompatible with strong acids, finely powdered metals, organic matter, chlorides, and combustible materials. Sodium cyanide is highly toxic and may be fatal if inhaled, absorbed through the skin or swallowed. Although it is stable under normal conditions, it should be stored in a dry, cool location and away from incompatible substances such as strong acids and oxidizing agents. KPF did not provide detailed information regarding specific storage and handling requirements for these materials designed to prevent accidental combustion/explosion, or spills. No specific PPE requirements or training programs were provided for the handling of these materials. KPF staff indicated that the procedures implemented for the storage and handling of hazardous chemicals are those imposed on them by their clients.

KPF provided NetGain with jetty expansion plans indicating design elevations relative to mean sea level. However, no information was received to indicate that the designs had considered climate change resilience from potential impacts including to navigation from drought (drougt may would affect design specifications for navigation channels), risk of flooding from increases in storm frequency or intensity, risk of flooding from increased intensity or frequency of storm surges, and increased risk of flooding from sea level rise.

NetGain did not receive a community health, safety, and security plan for review, nor did we receive a comprehensive emergency response plan; although KPF has developed and implemented an Emergency Management and Response Plan. Notably lacking were emergency response plans specifically referencing risks and responses associated with the storage of ammonium nitrate and sodium cyanide.

It is apparent that KPF has not yet developed a formal stakeholder engagement plan or grievance mechanism or implemented a documented process for stakeholder engagement. As part of the waste management plant ESIA, a public meeting was convened and this was followed by focus group meetings, but this effort was focused on the proposed project and not on KPF activities in general.

PS 3. Resource Efficiency and Pollution Prevention

KPF is not a significant generator of greenhouse gases (GHG) with sources being associated only with equipment used at the port for material handling such as cranes, loaders, and forklifts. Management of GHG from such sources consists primarily of keeping equipment in good working order through a well-structured and documented maintenance program. KPF has stated that they have a regular maintenance program for all port equipment, but no documentation was provided to that effect. The largest potential source of GHG at KPF is from truck traffic in and out of the facility and from vessels running main engines or generators wile docked at the facility. KPF have indicated that shore power is not available for vessels.

No information was provided on power use at KPF. NetGain did not receive an Energy Management Plan for review, including energy efficiency measures. Such a plan would be expected to be scaled to the energy uses at the facility and include consideration of energy flows and uses, energy use targets, and efficiency measures including energy conversion and availability of low carbon sources, if possible.

In regard to water use, KPF provided a log of water use for 2019-202 that provides figures for monthly water use. Many of the figures are identical, for example the period from April 4, 2019 through October 10, 2019 all show use of 1323.85 LC (presumed to be thousand liters), then use jumps to 27,235.05 on December 4, 2019. NetGain did not receive for review a water monitoring and management plan. Such a plan should include identification of major flows, development of water use goals and tracking and performance evaluation, and guidance for employees for water conservation practices. Water monitoring and management plans are typically scaled appropriately to the use of water at a facility, and in the case of a port facility would account separately for provision of water to customers' vessels.

ILACO (2019) identified airborne dust as a potential air quality impact from Port operations. This was confirmed via interviews with KPF staff. KPF staff also indicated that the facility uses watering trucks and a vacuum sweeper to control dust on port property as well as on access roads to the Port. NetGain was not provided with any documentation indicating ongoing air quality monitoring or the availability of an air quality management plan. Given the ongoing particulate sources at the port and the potential increase of emissions during construction, an ambient air monitoring program would be expected for particulates (PM_{10} and $PM_{2.5}$) as well as an air quality management plan. An air quality management plan would typically include schedules and procedures for dust control as well as trigger levels that may require other response or mitigation measures.

KPF did not provide any data on stormwater sampling or a stormwater management plan. The documentation provided indicates that stormwater from the site is discharged without treatment directly to the Suriname River or to municipal ditches that discharge to the river with no treatment. KPF reported that there is an oil/water separator at the Kuldipsingh maintenance facility adjacent to the Port, but no design specifications or monitoring data were provided associated with this structure. KPF staff also reported that the stormwater management system for the active Port area includes sedimentation basins and that these are periodically cleaned out.

Due to the risk of water quality impacts in the Suriname River due to discharges of untreated stormwater, a a phased stormwater management plan would be expected and consist of the following steps:

- Baseline sampling to determine if contaminant levels exceed applicable standards;
- If standards are not exceeded, a regular monitoring program would be expected;
- If standards are exceeded, dispersion modeling and/or sampling in the Suriname River would be expected to determine risks to aquatic life;
- If risks to aquatic life from stormwater discharges are unacceptable, development and implementation of a stormwater management and mitigation program would typically be required to avoid ongoing adverse water quality impacts.

A baseline stormwater sampling plan is intended to characterize stormwater streams from various potential source areas. In the case of KPF, these would include the Kuldipsingh maintenance facility, log storage yard, and major operation areas of the port. Sampling would typically include points at or near source areas and discharge points. If stormwater is known or suspected to enter KPF property from upstream areas, these would typically be sampled as well, including samples from the public drainage system. In the case of KPF, samples should be analyzed for potential contaminants including key metals (total and dissolved); TPH; volatile organic compounds; polycyclic aromatic hydrocarbons; phenols; biological oxygen demand (BOD) and chemical oxygen demand (COD); and total coliform and E coli. Other constituents such as pesticides are often analyzed, but typically only if such products are actively used at a facility. Detection limits should be adequate for comparison against appropriate national and international standards, including U.S. Environmental Protection agency criteria for the protection of aquatic life.

KPF appears to lack a focused Hazardous Waste Management Plan, although some of the elements have been developed. A Hazardous Waste Management Plan should be based on a site-wide hazard assessment of all waste streams, including waste resulting from spill cleanup and should contain the following elements:

- Management actions, including release prevention and planning for the control of releases, occupational health and safety specific to each hazardous substance, and process knowledge and documentation;
- Preventative measures including for hazardous materials transfer, overfill protection (for storage vessels), and prevention of reactions, explosions, and fires; and
- Control measures, for example, secondary containment for liquids, and leak detection for above/and below ground pipe systems.

A Hazardous Waste Management plan should cross-reference other key plans, including handling and storage procedures for sodium cyanide, ammonium nitrate, and quicklime, and emergency preparedness and emergency response plans and community stakeholder engagement and community health and safety plans. The Hazardous Waste Management plan should also provide documentation of any treatment and final disposal or recycling of hazardous wastes, including contracts with third party service providers.

KPF appears to lack a focused Solid Waste Management Plan, although some of the elements have been developed. A solid Waste Management Plan should be based on a site-wide assessment of all waste streams, including waste from office areas and wastes originating from clients (mainly vessels) and contractors. A solid waste management plan should contain the following elements:

- Waste management planning to identify waste streams and how they are currently managed and to identify opportunities for reduction, reuse, and recycling;
- Waste prevention measures, including assessment of alternative materials and good housekeeping practices;
- Recycling and reuse including employee training and identification of potential markets of materials; and
- Treatment and disposal, especially documentation that waste materials are being appropriately treated (if necessary) and that they are disposed on by licensed operators in licensed facilities.

The Solid Waste Management plan should cross-reference other key plans, including occupational health and safety.

KPF has detailed procedures for the transfer of fuel from their shore-based storage tank to a moored vessel, including the staging of spill kits. However, vessels are also bunkered from barge by Statsolie while moored at the Port facility. KPF staff indicated that spill prevention, control, and countermeasures, including spill response and cleanup, were the sole responsibility of Statsolie. Although this may be the case from a contractual standpoint, if a spill occurs during bunkering by Statsolie, and the spill response is not adequate, the situation is likely to reflect poorly on KPF resulting in a reputational risk, at a minimum.

PS 6. Biodiversity Conservation and Management of Living Resources

KPF staff have indicated that there has been no baseline flora and fauna characterization of terrestrial or aquatic areas that have been or will be affected by the proposed Port expansion and improvements. As indicated above, shoreline, intertidal, and shallow subtidal habitats in the Suriname River have been converted as a result of the jetty expansion. In addition, some terrestrial habitat may be lost over the mid-term as the log storage yard is converted to storage of materials in support of oil and gas exploration and development. In our opinion, all potential terrestrial and aquatic areas affected by the ongoing and planned expansion were heavily modified by historical development of the area for industrial, commercial, and residential development. However, this should be confirmed to the extent possible by a site visit once pandemic conditions allow.

Terrestrial areas likely contained pioneer species or at best, early successional tropical humid forest vegetation. These areas are isolated from the nearest natural habitat by several kilometers with no apparent flora or fauna corridors by which rapid colonization could occur. The riparian and intertidal/shallow subtidal areas affected by the jetty construction appear to be similarly modified prior to the construction.

Despite the fact that the converted habitats were likely low quality in their pre-construction condition, PS6 requires implementation of the mitigation hierarchy. The conversion of habitats has already occurred or is committed to occur; therefore, mitigation of impacts or establishment of biodiversity offsets would logically be required.

ANNEX A: Documents Reviewed

Kuldipsingh Port Environmental Assessment
Document's Reviewed

No	File Name	Document Title	Description
1	(UN)LOADING OF TURBULARS -28082017	Procedure Name: (Un)loading of turbulars	Process description
2	(UN)LOADING OF VEHICLES -28082017	Procedure Name: (Un)loading of Vehicles	Process description
3	11 febr 2019 - H1N1-INFLUENZA	in Dutch. Symptoms and treatment of H1/N1	Employee information flyer
4	AUDITING, MONITORING AND MEASUREMENT	Monitoring, auditing and measurement	process for HSSE
5	BUNKERING-FUEL TRANSFER-02082017	Procedure Name: Bunkering or fuel transfer	Process for fuel bunkering
6	CARGO CLEARANCE PROCEDURE-CC-20	Procedure Name: Cargo clearance	Process for clearing cargo (through customs); Process outline and references required documentation
7	CONFINED SPACE ENTRY -29082017	Procedure Name: Confined space entry	Documentation of process and SOPs
8	CORONA INFORMATION SESSION		Attendee list.
9	cost-overview for jetty	Cost overview for Jetty Expansion	One page table with cost by major construction element
10	CREW CHANGES-15062017	Procedure Name: Crew Changes	Procedure for change of crew
11	DISCHARGING AND TRANSPORT OF AMMONIUM NITRATE 15052017	Procedure name: Discharging and transport of Ammonium Nitrate	As document title indicates
12	EMERGENCY RESPONSE PLAN-15012019docx	Emergency management and response Plan v.2	As document title indicates
13	FATIGUE MANAGEMENT-02082017	Procedure name: Fatigue Management	As document title indicates
14	DC20180813-D12_WAPENING DEK B-D-12-WAP DEK		Site plan for construction
15	FDC20180814_D09_WAPENINGSDETAILS PAALKOP D-r-D-09		Site plan for construction
16	FDC20180828_D10 WAPENINGSDETAILS D-FD-D-10		Site plan for construction
17	HIRA - Bulk transfer of fuel	Name form: Task Based Risk Assessment Form – Bulk Transfer Of Fuel	Process risk assessment

Kuldipsingh Port Environmental Assessment
Document's Reviewed

No	File Name	Document Title	Description
18	HIRA - General activities	Name form: Task Based Risk Assessment Form – General Activities	Process risk assessment
19	HIRA - Handling and storage of chemicals	Name form: Task Based Risk Assessment Form – Handling And Storage Of Chemicals	Process risk assessment
20	HIRA - Handling and storage of wastes	Name form: Task Based Risk Assessment Form – Handling And Storage Of Wastes	Process risk assessment
21	HIRA - Loading and unloading of vehicles-goods	Name form: Task Based Risk Assessment Form –Loading and Unloading of vehicles/cargo	Process risk assessment
22	HIRA - Loading and unloading of vessels	Name form: Task Based Risk Assessment Form –Loading and Unloading of vessels	Process risk assessment
23	HIRA - Loss of control of Vehicles	Name form: Task Based Risk Assessment Form – Loss of Control	Process risk assessment
24	HOE GAAN WE OM MET DE CORONA ZIEKTE	In Dutch: Corona virus awareness	Presentation for employees
25	INCIDENT INVESTIGATING-22082017	Procedure name: Incident Investigation	Procedure and flowchart for reporting and investigating occupational incidents.
26	INDEX OF HIRA	Hira index	As document title indicates
27	ISPS 2019-2020	Statement of Compliance of a Port Facility	Certification of safety compliance from Government of Suriname
28	KKF UITTREKSEL ENGELS 2019	Extract from the trade register	Document related to incorporation
29	KPF layout plan 20200706 Layout1	In Dutch	Site layout plan
30	LIFTING -29082017	Lifting	Procedures for load lifting for loading and unliading vessels
31	misie,visie, HSEQ policy	Mission and Vision Statement HSEQ policy	As document title indicates
32	NED-MISSIE,VISIE	In Dutch	Mission statement
32	PERMIT TO WORK SYSTEM-28082017	Procedure name: Permit to Work System	As document title indicates, job hazard analysis prior to allowing work on site
33	Policy - ENG-MISSION.VISION	Kuldipsingh Port Facility Mission Statement	As document title indicates
34	Presentation KPF 1	Welcome: Kuldipsingh	Presentation overview of facility and company
35	Port Facility N V 20160717	Kuldipsingh Port Facility N.V.	Presentation overview of facility and company

Kuldipsingh Port Environmental Assessment
Document's Reviewed

No	File Name	Document Title	Description
36	PRESENTIONLIST - CORONA AWARENESSD	Attendee list	Attendees list for Corona presentation
37	PROPERTY RULES FINAL		Placard of symbols illustrating rules for being on the property
38	REGISTER OF PROCEDURES	Register of Procedures	List of procedures
39	SPILL RESPONSE-25072017	Procedure name: Spill Response	Outline of procedure
40	STORAGE, HANDLING AND TRANSPORTATION OF HAZARDOUS MATERIALS 28082017	Procedure name: Storage, Handling and Transportation of Hazardous Materials	Outline of procedure
41	SWM WATER TESTING	In Dutch.	Single sheet presenting results for three water samples for total coliform and E. coli.
42	TOOLBOX MEETING-08082017	Procedure name: Toolbox Meeting	SOP for toolbox meetings
43	URSL-BAXA7Z - ISO 14001 Certificate	Certificate of registration	As document title indicates
44	URSL-BAXA77 - ISO 9001 Certificate	Certificate of registration	As document title indicates
45	URSL-BD67N2 - Certificate 45001	Certificate of registration	As document title indicates
46	vergunning engels	Resolution of 29 March 2016 no. 219/RP providing for the granting of a license to Kuldipsingh Port Facility N.V.	As document title indicates
47	VESSEL CLEARANCE-15062017	Procedure name: Vessel and Customs clearance	As document title indicates
48	WASTE DISPOSAL-15062017	Procedure name: WASTE DISPOSAL	As document title indicates
49	WORKING ON HEIGHT 28082018	Procedure name: Working on Height	As document title indicates
50	(and corresponding scans)	None	Scans of forklift operator licenses
51	E&S-OSR Training	Attendance 12 and 13 November	Attendance sheets and photos of oil spill response training
52	WASTE MANAGEMENT PLAN	Waste Management Plan	Plan covers solid, hazardous, and general waste handling, storage, and disposal for proposed waste management facility at the port.

Kuldipsingh Port Environmental Assessment
Document's Reviewed

No	File Name	Document Title	Description
53	checklist equipment front	Pre-Use Checksheet for Mobile Equipment	Checksheet to be completed prior to using equipment (in Dutch)
54	checklist equipment back		Page 2 of document as above
55	pictures 2nd public meeting	ESIA Consultation meeting	Photo of public meeting associated with proposed waste management facility at Port site
56	DRAINAGE SYSTEM KPF	None	Single page plan view of facility indicating locations of site drains and drainage system
57	water usage data -kpf	Water Usage Date 2019-2020	Single page table of entries by date, approx. monthly from 8/1/2019 through 4/6/2020
58	CHEMICAL DATA-QUICKLIME	Quicklime data 2016-2020	Data on vessel, date, and tonnage for quicklime NW and Quickline RB
59	AN-CHEMICAL DATA-	Ammonium Nitrate Data 2020	Data on vessel, date, and quantity (Kg) for ammonium nitrate emulsion and Sodium Cyanide
60	KPF 3 October 2019	None.	Plan map of depth soundings off the Port facility
61	MAS_Accessibility KPF Jetty Notice oud	Accessibility Kuldipsingh Jetty	Letter from Maritime Authority Suriname to Kuldipsingh Total Concrete NV re. requirements for ships to navigate alongside the Kuldipsingh facility. Includes very small scale map with bathymetry data (points) off the Port.
62	SHIPPING NOTICE 2018	Shipping Notice 2018/3 Nautical Accessibility Suriname River	Letter from Maritime Authority Suriname with requirements for ships to navigate alongside the Kuldipsingh facility. Includes very small scale map with bathymetry data (points) off the Port.
63	dc vergunning bouw kade	District Commissioner's license to Kuldipsingh for the construction of a concrete quay (12 April 2011)	Original construction and operational license for the Jetyy/quay.
64	DC Vergunning No 2294.17 uitbreiding kade naar 440mtrs	District Commissioner Permit No. 2294.17 extension of the quay to 440 m	Establishes permit conditions for expansion of the KPF Jetty and construction and operation of the Jetty
65	SECURITY RISK ASSESSMENT	Security Risk assessment matrix	Matrix of relative risk level for each source of risk.
66	vergunning engels	Resolution of 29 March 2016 no. 219/RP providing for the granting of a license to Kuldipsingh Port Facility N.V.	Translation of document *Vergunning KPF Laden en Lossen*

Kuldipsingh Port Environmental Assessment
Document's Reviewed

No	File Name	Document Title	Description
67	Vergunning KPF Laden en Lossen	Presidential Resolution	Operating license for the Port
68	vergunning KPF	Presidential Resolution	Copy of document *Vergunning KPF Laden en Lossen*
69	Security Procedure English version_	Four documents: Site Security KPF; Access to KPF Site; Access Policy; and Documentation Access Control	Dictates activities to be undertaken by security personnel, procedures for checking in visitors, policy for checking visitors in- and out; list of activities that need to be documented.
70	incident Tuinfort team challenge (1)	Incident Form 3_7_2019	In Dutch with English annotations. Injury incident report. Sections include description of the incident, how it happened, what aid was offered, actions taken, and preventive measures.
71	KPF_Client Report 9001 - 2019	Audit Report Kuldipsingh Port Facility	Audit report by United Registrar of Systems on ISO 9001 compliance. Issues raised concerned no evidence of monthly or weekly QMS meetings and no awareness sessions for all staff
72	KPF_Client Report 14001 - 2019	Audit Report Kuldipsingh Port Facility	Audit report by United Registrar of Systems on ISO 14001 compliance. Issues raised concerned no evidence of monthly or weekly QMS meetings and no awareness sessions for all staff.
73	KPF_Client Report 45001 - 2019	Audit Report Kuldipsingh Port Facility	Audit report by United Registrar of Systems on ISO 45001 compliance. Issues raised concerned no awareness sessions for all staff and no fire drill response evidence.
74	Kuldipsingh Initial Closeout March 28 2019	Closeout Meeting Kuldipsingh Equipment NV, ICMC transportation initial certification audit	Presentation slide deck. Substantial compliance noted for most principles, many action items
75	Kuldipsingh Signatory to the ICMC	Letter	Letter July 16, 2018 acknowledging receipt of application for certification and describing requirements that must be met.
76	Kuldipsingh external audit report	None	PDF of a table listing action items for cyanide management, apparently in response to pre-certification audit.
77	Final Investigation Report May 03 2019 MV SHOU CHEN SHAN	Incident Investigation Report	Investigation report of stevedore injury while unloading pipe for Statsolie. Joint investigation Stasolie/KPF
78	SFTG-4395-0011	KPF Fenders for Sections S3 & S4	Drawings for fender design at jetty. Provided in response to request for elevation of port facility relative to flood levels and climate change.

Kuldipsingh Port Environmental Assessment
Document's Reviewed

No	File Name	Document Title	Description
79	env & social impacts	Rating of environmental and social impacts caused by the expansion of the jetty at the Kuldipsingh Port Facility	Environmental impact matrix associated with expansion of the jetty based on probability and severity of imapcts.
80	-FDC20180813-D12_WAPENING DEK B-D-12-WAP DEK (1)	In Dutch	with sea level elevations. Provided in response to request for elevation of port facility relative to flood levels and climate change.
81	IS-347-Final Draft ESIA KPF Waste Management Plant-18109	Environmental and Social Impact Assessment (ESIA for the Kuldipsingh Port Facility (KPF) Waste Management Plant	ESIA completed by ILACO, Final Draft October 18, 2019.

ANNEX B: Site Visit Report

KULDIPSINGH Port Facility N.V.(KPF)

Site Visit Report prepared for Net Gain

Ecological Services, LLC

Consultant: Nancy del Prado

8/4/2020

Table of Contents

KULDISPSINGH PORT FACILITY N.V. (KPF) SITE TOUR

Attendees for KPF site tour	
In Person Attendees	**Remote Attendees**
For KPF: • Vinood Ramkhelawan, General Manager • Kavita Ramdjielal, HSE Supervisor For IDBI: • Nawien Ghisiawan, IDB Investment Management Officer	For IDBI: • Carolina Dousdebes Cordova, IDBI Environmental and Social Officer
For Net Gain Ecological Services: • Nancy del Prado, Consultant, Environmental Law and Policy	For Net Gain Ecological Services: • Pieter Booth, Principal

On the 4th of August 2020 a complete overview of the Kuldipsingh Port Facility was provided to the IDBI team with the use of a drone. The remote and in person attendees from both Net Gain Ecological Services and the IDBI were able to ask several questions regarding the Port Facility itself and the operations that are currently taken place. Before the site visit started, those present watched an induction film of the Kuldipsingh Port Facility accompanied with a brief introduction by the HSEQ Supervisor, Kavita Ramdjielal. During the virtual tour visit Vinood explains and answers questions asked by the IDBI and Consultants. The main focus for the development and expansion of the Port facility is to facilitate the Oil and Gas sector in Suriname.

Overview of the Kuldipsingh Port Facility N.V. area.
1 = partially developed land, 2 = log area, 3 = jetty, 4 = covered storage area, 5= open storage area 6 = office

The following sections provide a brief overview about the topics that were discussed during the site tour.

Land Availability in the surrounding area and roads

- Kuldipsingh is still in the negotiating process with private landowners in the neighboring area to expand their property.
- Kuldipsingh has its own private paved road to enter the main facility.
- The road that is being used to reach the log yard is property of Kuldipsingh.
- The storage area of wood is half property of KPF and the other half of another party

Log storage area

- It is projected that the area currently being used for storage of logs will in future be used for storing supplies and materials (e.g., pipes) for the oil and gas sector

- The stored logs are not owned by Kuldipsingh, they only facilitate the unloading and temporary storage of the logs.
- KPF has asserted that storage of logs supports the compressing of the soil.
- Storage capacity is approximately 30 thousand tons
- There is an open drainage around the log storage area to manage stormwater.

Fill material

- The material that Kuldipsingh is using to fill their land to raise the grade is being bought locally and extracted from their own quarry, including gravel

Paved area: The 200 M of jetty line and the paved area is already ready to be used for the Oil and Gas sector: handling/loading/unloading material for offshore and storage of pipes, etc.

Partially developed land

- The soil in this area consists mainly of mud. In the future this area will be used for the storage of heavy equipment.
- **Piling of the Jetty:** geo measurements were taken in the past.

Dredging

- An ESIA has been conducted for the dredging program. The Government is responsible for the general dredging of the channel, but the company is responsible for dredging in front of the jetty.
- Kuldipsingh frequently performs maintenance dredging in front of their Jetty.
- The dredged material consists mostly of very soft mud.
- The dredged material is being disposed in the sea at the west side of the mouth of the Suriname river. The location and the instruction for disposal is provided by the Government of Suriname.
- Minimum depth of dredging is 4.5 m during the first stage (this month) and during the second stage it will be 5.5 m.
- Kuldipsingh tries to keep up the maintenance of the port to reduce sediment discharge from the land in front of the Jetty.
- A typical dredge equipment is being used: cutter suction dredger.

Jetty: Currently 350 m jetty line is in use. With the expansion of 50 m, the total Jetty line will become 400m.

Stormwater management

- During the site tour dark areas where visible on the premises of the Port. These dark areas represent places where stagnant water can occur after a heavy rainfall.
- Over the full length of the jetty there are sheet piles which protect against erosion from the log yard.

- Kuldipsingh has an open sewer system that collects the stormwater from the premises. Several pits with round concrete sewer pipes are located on the port.
- Due to the unpaved area where the logs are temporarily stored it is still a huge challenge to manage this.
- Effluents of stormwater are not monitored.
- The open sewer system consists of pipes with high and low flow properties. Debris ending up in the system can easily be maintained and cleaned up.
- For the open sewer system cleanup, Kuldipsingh has a small excavator.

Services that the Port provides

1. **Port services:**
    - Unloading and loading ships with any type of cargo.
    - Storage facilities for large batches of bulk cargoes, steel, heavy equipment and containers. 90 % of the storage area is used for export purposes.
      Kuldipsingh stores cement and provides storage for materials for the Gold mining industry.
    - Deliveries of loads from the storage space at the port to the designated space of the customer (delivery of supply cargo to the mining area (big bag cargo).
      Special berth for offshore ships.
2. **Berth Facilities:** Accommodates all types of vessels with berth space for loading and unloading cargoes in and from Suriname.
3. **Storage Facilities:**
    - Open Storage Area available for Logs, Steel pipes.
    - Covered Storage for storage of Cement, Lime, Rice.
    - Warehouse for General cargo.
    - Open Area for Container and Vehicles Storage.
    - Existing jetty
- Warehouse administration for the clients
- Agency services
- Complete logistics and Stevedoring

Unloading of the logs on the quay.

Fuel Storage: There is a storage tank for diesel (own use) and is provided with a bund wall here referred as containment bin.

The log yard and the storage tank for diesel with containment bin (see red arrow).

Empty ISO-tanks.

Storage Area

- Warehouse storage: 40% Kuldipsingh Cement, 60% for the Mining Industry.
- In the warehouses are stored carbon, SMBS, quicklime, caustic soda, flocculant and in a separate warehouse ammonium nitrate.
- Sodium Cyanide and ammonium nitrate emulsion are temporarily stored in containers on the port for pickup by the client.
- Storage of chemicals is performed according to the guidelines provided by the Gold Mining Companies.
- Ammonium Nitrate is stored in the Warehouse.

KPF stores ammonium nitrate in a closed warehouse. At the time of the site visit, there were 120 tons of ammonium nitrate stored and we were informed that the material was exported on the 14th of August 2020. The company Orica is the supplier of chemicals for Rosebel Gold Mining and Chisu International. Orica has provided KPF with procedures and guidelines regarding the storage of the chemicals that they supply. The document "Code of Good Practice – Storage of solid ammonium nitrate" which provides procedures on the storage of ammonium nitrate can be found in the folder attached to this document.

The other gold mining companies haven't provided KPF with procedures or guidelines regarding the storage of their chemicals because KPF doesn't store them. The imported chemicals are unloaded by KPF and are immediately transported to their designated location.

Overview of the Kuldipsingh Port Facility N.V. area and the red arrow indicating the warehouse where Ammonium Nitrate is being stored.

Wastewater: Waste water from the bathrooms and kitchen are being collected in a septic tank which is periodically pumped by a contractor.

Potable Water: There is a storage for potable water on the premises (connected via an underground pipe to the main road).

- The water is currently moved with tanks to the jetty to supply water to moored vessels, but in the future an underground pipeline to the jetty will be used.
- The potable water is tested for *E. coli*. From time to time. Kuldipsingh sends water samples to the Suriname Water Supply Company (Surinaamsche Waterleiding Maatschappij) in order to get a certificate. This is important for their clients.

Kuldipsingh potable water tanks.

Flora and Fauna:

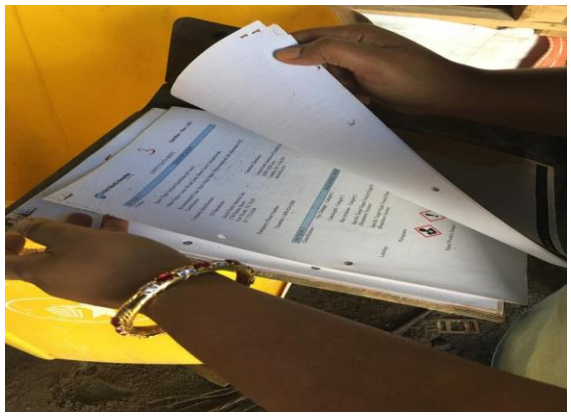
There is no documentation of endemic or endangered species around the Port. Where the logs are stored Staatsolie developed a pipeline about 7 years ago. Kuldipsingh bought the land 2 years ago. Kuldipsingh is not aware if there was any kind of investigation regarding the species composition of this area. Kuldipsingh knows that the area was a swampy area back then. In the past few years, the area has been completely changed to an industrial area.

General observations

- No pedestrian paths are yet implemented on the port.
- The floor of the warehouses is made of sand. The big bags are stored on pallets. The chemicals are sorted by groups in 1 area (warehouse). The MSDS sheets are readily available in the warehouse. There is a fire extinguisher that is checked regularly.
- The bags of caustic soda are damaged and there are leaks. This regards a batch from 2018 and the mining company in question has still not given instructions on what to do despite repeated requests from KPF.
- The ISO tanks stored on the facility are empty, waiting to be shipped.
- Staatsolie fuel is being bunkered at KPF, but KPF indicates that responsibility for spills from bunkering rests with Staatsolie.

Inside the warehouse.

Shower across the street from the warehouse.



The MSDS are stored in the warehouse.

Warning sign at the entrance of the warehouse.

Plaques of chemicals stored in the warehouse.


Damaged caustic soda bags stored in the warehouse

Staff interviews

Attendees for interviews	
In Person Attendees	**Remote Attendees**
For KPF: • Vinood Ramkhelawan, General Manager • Kavita Ramdjielal, HSE Supervisor • Marcel Sporkslede, Head of Operations • Verna Garconius, PFSO in charge of security For IDBI: • Nawien Ghisiawan, IDB Investment Management Officer	For IDBI: • Carolina Dousdebes Cordova, IDBI Environmental and Social Officer
For Net Gain Ecological Services (IESC): • Nancy del Prado, Consultant, Environmental Law and Policy	For Net Gain Ecological Services (IESC): • Pieter Booth, Principal

Employment history, reporting, compliance with legal regulations of the country and international standards

- Marcel Sporkslede Head of Operations has been working for almost 5 years at the Kuldipsingh Port now and has 25 years of experience in port operations; In discharging and loading of vessels.
- Marcel oversees 65 people who work under his supervision, including stevedores.
- Stevedores age average is between 20 – 40 years. The regular workers are between 30 – 40 years. Most of the stevedores are indirect workers.
- Number of employees under Marcel supervision: Direct 16 and 50 indirect.
- The stevedores and regular workers report to Marcel.
- Marcel reports to Vinood, the General Manager.
- Workdays: Monday till Saturday. (In some cases, its everyday dependent on operations on the port)
- Training of stevedores: trained according to the vessel they will handle.
- 2 Work shifts on the port: 7.00 am- 19.00 pm (12.00 pm – 13.00 pm lunch break) 19.00 pm crew change. Second shift from 19:30 pm- 6.30 am (00:00-01:00 lunch break).

Health and Safety

- The person in charge of Safety and Health during the 2 work shifts is Marcel. But he also delegates this task to 2 foremen and 1 supervisor when he isn't present. During every shift 2

foremen and 1 supervisor are in charge. In case of any difficulties Marcel is contacted and will be present.

Safety training task

- During every shift there is a toolbox meeting (information regarding PPE needed for handling certain types of vessels, equipment that will be used etc.)

Register

- There is a register called a toolbox book where the names of the people working and the remarks are documented.

What procedure is being followed in case of a health problem or emergency?

- Currently KPF is in a process to train their own internal medical team. There are first aid responders in the team. In case of a bigger health issue the police will be notified followed by the paramedic ambulance. KPF does not have a resident doctor onsite.

Covid- 19

- Before entering the KPF everyone's temperature is checked. Mouth and nose covering are mandatory and hand sanitation is required. At the entrance of the Head Office where the meeting was held and outside where the lunch area is, we observed a bottle of hand sanitizer.
- The working groups during the toolbox meetings are minimized to small groups.
- Along the vessel side there is access to wash your hands with soap
- KPF reports that there haven't been any positive cases of covid-19 on the port.
- The port does not test for covid-19. If a person has a fever they are denied entry to the port.

Meals

- There is no kitchen for the employees on the premise, they bring their own meals. There is an open area at the Head Office where people have their lunch and it is also a smoking area. Next to this area, there is a small enclosed lunch room.
- During the day the employees have access to drinking water. We observed water dispensers in the small kitchen on the first floor of the Head Office, at the Office of Operations (ground floor), and at security. Cool boxes with water and ice are transported to the jetty for the workers

Accidents

- In 2019 there were 2 accidents. One accident occurred during loading of logs and the other occurred during discharging of pipes. In both cases they had feet injuries.
- The injured employees returned to work after their recovery.

Certificates and Training regarding cranes

- There is certified lifting equipment in place (this equipment is inspected every 6 months or once a year depending on the equipment)
- Kuldipsingh works with vessel cranes. In Suriname there are no companies or institutes that provide training on vessel cranes. Kuldipsingh trains its own personnel.
- There is no register for the vessel crane operators, only for the onshore crane operators.

Fire response

There are fire extinguishers at several locations at the port. Some of the employees are trained to work with the equipment. Fire extinguishers were observed at the following areas: Operations Office upstairs (CO_2), Office of the General Manager (CO_2), Operations Office downstairs (CO_2), by the stairs at the entrance (powder extinguisher); Security post (CO_2), at each door of the warehouse; and in the maintenance area (foam).

There is no firefighter brigade present at the port, employees are trained to work with the fire extinguishers. In case of a big fire, the fire brigade will be called.

Fire extinguisher in the closed storage warehouse.

Perception of the workers on safety at the port

- There still needs to be some improvement and more training is necessary.
- Some clients provide specific training to KPF personnel.

Complaints

- Employees can address their complaint directly to Marcel. If a solution is not forthcoming, it will be submitted to Vinood.
- There is no anonymous complaint box on the premises.

Gender

- There are mostly men working on the port because it requires a lot of physical work. Women can also do the job but we often see that men perform this kind of work. It has happened in the past that a woman had applied for a job at the port but after seeing the physical labor she turned down the job offer. On the port, women mostly perform administrative work.
- KPF asserts that there is no gender discrimination.

Confined spaces on the vessel

- The most confined space is going through the manhole on a vessel and on the crane to get in the cabin. The space is for only one person at a time. Usually there are 3 employees working on there and need to go through that space.
- At Kuldipsingh the employees do not work in containers.
- There is no checklist for confined space work.

Hazardous Materials

- Storage of hazardous materials are in containers and in the warehouse. In the containers nitrous acid and cyanide are being stored.
- Duration of storage: 1-3 days

Safeguards

- There are signs and Material Safety Data Sheets (MSDS).
- The MSDs are in the office and in the storage area.
- There is a shower area with a douche including eye wash facet present on the premises across the storage area.
- No liquids are stored in the storage areas
- The use of PPE is mandatory. Both the (direct) employees and the (indirect) employees are provided with PPE by KPF.

Promotion of the health and safety management

- Health and safety are being promoted on the port. The HSEQ information is provided on KPF internet server drive. It contains all the procedures and all employees have access to the drive.
- There is no budget allocated to HSEQ system.
- The department of HSE focusses on incident prevention (aim is to have not more than 3 incidents per year). There is a full Taproot report on the accident with the pipes.
- “MBWA (Management by Walking Around) is being implemented by the Manager. It is a commitment of the Manager to walk in the field each day to inspect the work which also include looking at HSEQ aspects.

Stop work cards

- Kuldipsingh does not routinely use stop work cards. They have only been used for oil and gas operations as it was required by the oil company. The O&G company provides the training on the use of stop work cards.

Spill prevention and response

- Kuldipsingh has a small spill kit in the warehouse. In case of a spill, the client will be notified
- Spills have been reported and the clients were informed.
- Other spills that have occurred are for example a crack in a big bag of cement.
- Most spills occur in the warehouse
- There is no reporting on fuel spills
- If a spill occurs during oil bunkering with a Staatsolie vessel, Staatsolie will be held responsible.
- KPF employees were recently trained in oil spill response by Exxon Mobil and Tullow Oil as a requirement of these companies when making use of the Port facilities.

ISO certification

- KPF is certified on quality, environment, and safety (last was in 2019 on all 3)
- The major observation mentioned in the last Audit reports included the need for more awareness sessions for staff, evidence (reports) of monthly or weekly meetings and more meetings with all relevant persons of the departments.
- Big bags with chemicals that are going in and out to the clients are being registered. Kuldipsingh recently started with the SAP system as a logistical system for registering all big bags coming in or out the port.

Air quality and GHG emissions

- There is currently no data on air quality of the area. The data from the ESIA study can be used as baseline.
- Information regarding fuel consumption is written on a form. An overview can be provided on the consumption of fuel (provided by the Finance department).
- Kuldipsingh has a diesel tank, dipstick and a volume tank calculator.

Flooding: KPF asserts that the jetty is built to prevent flooding.

Maintenance

- There is a main maintenance area and a small one on the premises.
- Maintenance schedules are regularly checked
- There are sperate bins for waste oil, oil filters and air filters. The waste oil and oil filters are brought to the Main Equipment department and are picked up by a waste oil contractor.

- Tires and other parts are not collected. Tires are not changed on the port.
- There is an oil and water separator at the Wash bay at the main Maintenance area.

The maintenance area.


Oil and water separator at the Wash bay.

Waste

- Waste that is being produced includes oil, oil filters, air filters, debris from the logs and general household waste.
- Household waste is transported to the open landfill Ornamibo.
- Debris of wood is being used to fill up the land.

Climate change readiness: The port doesn't have a climate change readiness plan.

Security

- The PFSO in charge of security has worked for almost 10 years at the port. The port has 36 security officers.
- Security officers do not carry firearms
- 2 Audits are yearly performed by the designated Authority (MAS) and the US Coast Guard
- The shifts are from 7.00 am- 15.00 pm, 15.00 pm- 23.00 pm, 23.00 pm-7.00 am
- A security assessment for the port has been conducted.

Sign with the property rules of KPF.

Risks are: sabotage, terrorism, vandalism but no drug trafficking

- A Security Plan is in place and has been approved by MAS. The port has already had an audit this year and is still waiting for their certificate. Due to covid-19 this has been delayed.

Training: ISPS training (PFSO in charge of security), security training, drill exercise training.

Training on environmental health and safety: The HSE Supervisor did some internal training with all the employees on HSEQ issues. The port is currently in the process of training their own internal-medical team. Most of the security officers do have first aid training and have been trained to work with the fire extinguishers.

Transportation: Kuldipsingh does not provide transportation for their employees.

Camp on site: Nobody is currently living on the port.

Security breaches: Once, a ship requested armed security a few years ago, because of stowaways on the ship.

Emergency response plan and explanation of the system

- Kuldipsingh has an Emergency response plan.
- The system is very general and exclusive from the security. The security department has their own system.

Bunkering barge

- In the case of bunkering and there is a spill. It will be the responsibility of Staatsolie to clean that up. When a spill occurs on KPF premises it is reported to the Head of Operations.
- Kuldipsingh is not involved during the bunkering operations.
- In case of a spill in the river MAS is the first to be notified.

Code of conduct for security personnel

- Procedures before entering the facility and patrol procedures.
- These procedures are all documented.

Dust control

- Kuldipsingh has dust control measures in place for the unpaved road within their premises.
- Especially during the dry season these measures are executed.
- Kuldipsingh has a vacuum truck for dust maintenance.
- Kuldipsingh has plans to grow a green wall to reduce dust and noise pollution.

Health

- The employees have access to bathrooms in the working area and drinking water.
- First aid kits are available: 1 in the office of the Head of Operations, 1 in the office of Security and 1 in the Office of the Main Building.

Solar power: There is no solar power system on the port.

Contractors – requirements regarding health and safety

- Induction signing and an induction movie are used for all entering the premises (can also be done at the security office after registration.
- The rules of the port are laid out and explained.

Follow up by KPF

- KPF will send one of the incidents reports.
- KPF will send the audit reports for all ISO certifications.
- KPF will send NSP #
- KPF will send the ICMI certification

ANNEX C: Public Consultation Report

ONLINE PUBLIC CONSULTATION

OF THE KULDIPSINGH PORT FACILITY N.V.(KPF)KULDIPSINGH PORT FACILITY N.V.

Facilitator: Nancy del Prado

06-08-2020

On the 6th of August 2020 an online Stakeholders meeting was held by Kuldipsingh Port Facility N.V. During this meeting the stakeholders were informed about the aim of the project, the potential environmental effects resulting from the expansion of the port facilities as well as the intended measures to control these potential effects. On the same note, a description was given of the Grievance mechanism to be developed and to which the community can turn with its questions, complaints, suggestions, and requests for information. After the presentations the stakeholders were given the opportunity to ask questions about what had been presented. An announcement for the meeting was published in the *De Ware Tijd* newspaper on July 29, 2020 (see Exhibit A).

From left to right Kavita Ramdjielal (HSE-Q Supervisor, Kuldipsingh Port Facility N.V.) and Nancy del Prado (Consultant, Environmental Law and Policy)

The following table provides an overview of the stakeholders that participated during the meeting.

Participant	Organization
1. Nancy del Prado	Consultant, Environmental Law and Policy
2. Pieter Booth	Principal, Net Gain Ecological Services (IESC)
3. Kavita Ramdjielal	HSE-Q Supervisor, Kuldipsingh Port Facility N.V.
4. Aryan Panchoe	Capstonelogix N.V.
5. John van Alen	Vabi Port
6. Bernice Mahabier	Maritime Authority Suriname (MAS)
7. Shareen Koenjbiharie	ILACO Suriname NV
8. Monique Sewtahal-Sewnath	National Institute for Environment & Development in Suriname (NIMOS)
9. Dean Gummels	Gummels
10. Suraya Nanan	Haukes
11. John Cheng	Hospitality Services Suriname
12. Sjioerd Poort	N.V. VSH Transport
13. Chermine Burleson-Wirojotaroeno	Commissariat - South East Wanica Environment and Health Service
14. Lloyd Cameron	4U Business Solutions
15. El Wanni	Unknown
16. Anjani Natha	Maritime Authority Suriname (MAS)
17. Christy Warmoe	Maritime Authority Suriname (MAS)
18. Vanessa Sabajo	Cabinet of the President, Coordination Environment
19. Calmero	Unknown
20. Marina Faerber	Kuldipsingh
21. Unknown (Galaxy A30s)	Unknown

Stakeholder Company/Organization		Questions/Remarks/ Answers
Surya Nanan	Haukes	During the presentation only the short-term environmental impacts where presented. What are the long-term environmental impacts of the proposed project on the Suriname river because the use of the Port will be intensified. **Pieter Booth:** The presented short-term impacts are mostly during the construction phase of the project. With regard to the long-term impacts, these will be likely linked to stormwater runoff and whatever contaminants (for example linked to spills on the land) that could enter the river.
Monique Sewtahal-Sewnath	NIMOS	NIMOS is responsible for administrating and guiding to the ESIA studies in Suriname. Suriname has also recently approved the Environmental framework Act. How will the Surinamese counterpart NIMOS be involved in this? **Nancy del Prado:** This limited desktop study hasn't been conducted as part of a permitting process of the Government. The study is part of the due diligence procedure of the IDBI for the application of a loan. **Pieter Booth:** This study will be part of the Internal Due diligence Process of IDBI for granting the loan.
Monique Sewtahal-Sewnath	NIMOS	If the loan has been approved will the EIA process be instituted? **Nancy del Prado:** Kuldipsingh already has its permit for the expansion of the Port Facility.
Monique Sewtahal-Sewnath	NIMOS	It should be noted that the EIA now has a legal basis due to the approved Environmental framework Act. Expansion of ports are also subjected to this process. **Nancy del Prado:** This will be further elaborated and discussed with the Kuldipsingh group.
Bernice Mahabier	MAS	During the presentation, Kuldipsingh Port Facility indicated that in the future the Port will be able to accommodate different kinds of vessels. Are Oil tankers also included? **Kavita Ramdjielal:** With the expansion of the Port it will be possible to accommodate different types of vessels. If an application regarding oil tankers is made, Kuldipsingh will certainly take this under the loop and MAS will be notified.

Exhibit A: Newspaper Announcement

Barça denkt aan sancties tegen rebel Arthur

BARCELONA — Barcelona is gisteren na een korte vakantie begonnen met de voorbereiding op de return van de Champions League-achtse finale tegen Napoli. De rebellerende Arthur ontbrak als enige op de training.

Maandag maakten de Spaanse media al melding van het feit dat Arthur zich niet had gemeld op de club om net als de rest van de selectie een coronatest te ondergaan. Gisteren ontbrak de 23-jarige middenvelder ook op de training, zoals hij zondagavond al had aangekondigd bij de directie van Barça.

Volgens de sportkranten, die gisteren groot uitpakken met de werk- weigering van Arthur, had de clubleiding eigenlijk verwacht dat het bij een loos dreigement zou blijven. Maar de twintigvoudig international van Brazilië blijkt nu toch echt van plan te zijn om zijn vakantie in eigen land af te maken, voordat hij naar Juventus overstapt.

Arthur is naar verluidt verbolgen over de manier waarop de club hem heeft behandeld. De Braziliaan, die in eerste instantie helemaal niet wilde vertrekken naar Juve als onderdeel van de ruildeal met Miralem Pjanic, zou van trainer Quique Setién te horen hebben gekregen dat hij minder zou gaan spelen en goois nu zijn kont tegen de krib.

Dat Arthur weigert nog langer mee te trainen met de club, laat staan mee te doen in het vervolg van de Champions League, leidt mogelijk tot een flinke sanctie wegens contractbreuk. Barça beraadt zich inmiddels op juridische stappen en zou Juventus, de toekomstige werkgever van de middenvelder, daarbij aan zijn zijde hebben.

Getty Images

Arthur wenst niet meer voor Barcelona uit te komen.-.

Er was gisteren ook goed nieuws voor Barcelona. De Franse vleugelspits Ousmane Dembélé maakte na maandenlange afwezigheid zijn rentree op het trainingsveld en kan mogelijk nog meespelen in het restant van de Champions League. Ook Antoine Griezmann en Clément Lenglet zijn weer terug na hun blessures.-.

Ook tennistoernooi Tokio geschrapt

TOKIO — Weer gaat er een streep door een groot tennistoernooi. Het WTA-toernooi van Tokio, dat begin november gepland stond, is geannuleerd. De organisatie van het Pan Pacific Open zegt de veiligheid van alle betrokkenen niet te kunnen garanderen.

Het hardcourttoernooi, dat vorig jaar in Osaka werd gehouden en toen met de Japanse Naomi Osaka de "gedroomde" winnares kreeg, was eerder al uitgesteld van september naar de eerste week van november. Het is het derde tennistoernooi in Japan dat vanwege het coronavirus wordt geschrapt.

Vorige week werden ook alle internationale tennistoernooien in China van dit jaar van de kalender gehaald. Dat maakte de tennisbonden ATP (mannen) en WTA (vrouwen) bekend nadat China een verbod op alle internationale sportevenementen had uitgevaardigd. Dat betekent dat er dit jaar nog maar één evenement gepland staat in Azië; het Korea Open in Seoul begin oktober.

Het WTA-seizoen wordt, na een onderbreking van bijna vijf maanden, op 3 augustus hervat met de Palermo Open op het Italiaanse eiland Sicilië. Voor de mannen begint het seizoen waarschijnlijk op 22 augustus met het Southern & Western Open in New York.-.

Real Madrid-aanvaller besmet met coronavirus

MADRID — Real Madrid-aanvaller Mariano Díaz is positief getest op Covid-19. De Spanjaard mist daardoor de return van de achtste finales van de Champions League over anderhalve week op bezoek bij Manchester City.

Real meldde gisteren op de eigen website dat Díaz inmiddels in zelfisolatie en thuisquarantaine is gegaan. Dat moet hij twee weken, waardoor de kraker tegen City op 7 augustus net te vroeg voor hem komt.

Het is niet bekend waar Díaz het coronavirus heeft opgelopen. De spelers zijn na de laatste competitiewedstrijd vorige week een korte periode vrij geweest en bereiden zich sinds maandag voor op de ontmoeting met City.-.

Nurmagomedov vecht in oktober tegen Gaethje om titel

Foto / Essentially Sports

Khabib Nurmagomedov

WASHINGTON — MMA-vechter Khabib Nurmagomedov zal op 24 oktober tegen de Amerikaan Justin Gaethje strijden om de wereldtitel in het lichtgewicht. Dat heeft UFC-voorzitter Dana White gisteren aangekondigd in gesprek met *CNN*.

Het prestigieuze gevecht stond aanvankelijk voor september gepland, maar Nurmagomedov zei in mei dat hij vanwege de coronacrisis en de ziekte van zijn vader voorlopig geen trek had om terug te keren in de octagon. Abdulmanap Nurmagomedov, die in mei besmet raakte met Covid-19 en daarna op de intensive care moest blijven vanwege complicaties aan hart en nieren, overleed begin juli op 57-jarige leeftijd.

Hij was niet alleen de vader, maar ook de coach van zijn zoon. "Khabib zag zijn vader als een held en ze hadden een heel hechte relatie, dus zijn dood had een grote impact op zijn leven", benadrukt White, die aanhoudende geruchten in diverse media over een pensioen van Nurmagomedov onkrachtig. "Ik kan jullie vertellen dat het gevecht met Gaethje gewoon doorgaat."

Aanvankelijk zou Nurmagomedov op 18 april tegen Tony Ferguson vechten om de wereldtitel, maar die krachtmeting kon door de Covid-19-pandemie niet doorgaan. Ferguson nam het in mei als Nurmagomedovs vervanger op tegen Gaethje, die door zijn overwinning de interim-titel veroverde.

De 31-jarige Nurmagomedov won tot dusver al zijn 28 gevechten in de UFC. Het laatste optreden van de Russische wereldtopper was in september 2019 tegen de Amerikaan Dustin Poirier.-.

Exhibit B: Presentation Kuldipsingh Port Facility

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KULDIPSINGH

PROJECT: EXPANSION OF JETTY AT KULDIPSINGH PORT FACILITY N.V.

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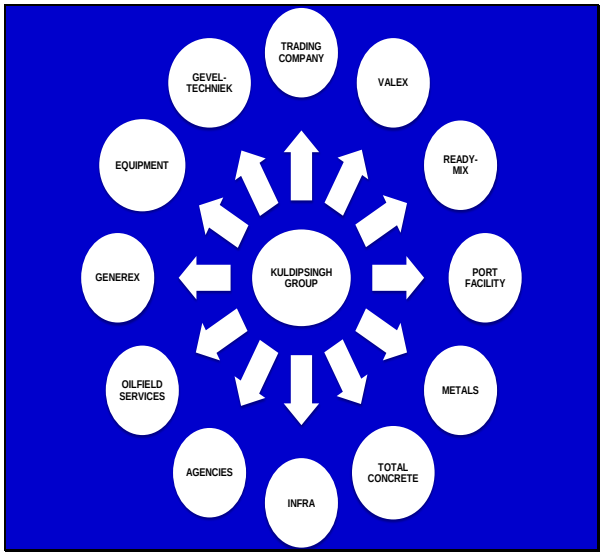
KULDIPSINGH

WELCOME AT THE KULDIPSINGH GROUP

- The Kuldipsingh Group consists of 12 companies



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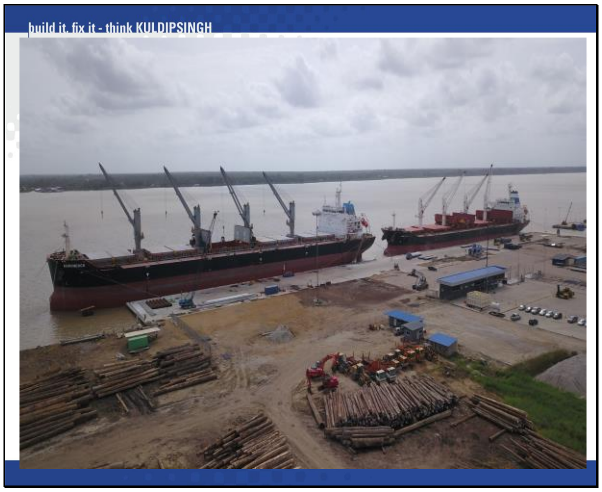
KULDIPSINGH PORT FACILITY N.V.

KULDIPSINGH

- Manager → Vinood Ramkhelawan
- Non-Governmental Landlord and Terminal Operator. Established in June 2015
- Certified by International Ship and Port Facility Security (ISPS), TRACE Certified, ISO 9001: 2015, ISO 14001: 2015 & ISO 45001: 2018
- Current Deck Load Capacity: 6160 M2 of 5 MT + 4455 M2 of 10 MT.
- Total berth length of 400 meters.
- Mooring Possible for all Types of Vessels.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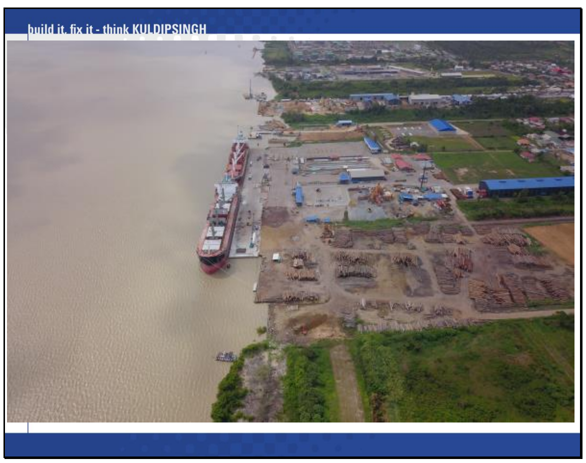
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Potential Environmental Impacts

The proposed Project will improve the Port's ability to efficiently handle increased cargo, but otherwise not modify the basic nature of Port activities.

Major sources of potential impacts:

- Jetty extension
- Filling of existing land to accomodate materials staging
- Construction of warehouse/office buildings

- Potential short-term impacts
  - Suriname River water quality
  - Noise
  - Dust
- Potential long-term impacts
  - Emissions from additional equipment operating
  - Spills

build it, fix it - think KULDIPSINGH

KULDIPSINGH

Actions to Avoid, Minimize, or Mitigate Adverse Impacts

Impacts from port expansion will generally be low magnitude and temporary.

KPF currently has in place many management practices to avoid, minimize, and mitigate adverse impacts that may be generated by Port expansion.

KPF to identify areas of potential ongoing risks and implement improvements to avoid, minimize, or mitigate those risks

- Air
  - Active dust control
  - Equipment maintenance protocols
- Water
  - Stormwater management
  - Best practices during construction
- Noise
  - Equipment maintenance protocols
  - Abatement plan
- Spills
  - Adherence to standard operating procedures
  - Spill control and cleanup procedures and spill response readiness

KULDIPSINGH

What is a Grievance Mechanism?

OBJECTIVE: "...to receive and facilitate resolution of the affected communities' concerns and complaints about the Project's environmental and social performance."

A grievance mechanism is an institutional program within a company that has designated personnel, a reporting and documentation structure, and a budget

- How it will work
  - Develop and publicize procedures
  - Recieve and track grievances
  - Review and investigate grievances
  - Develop resolution options and prepare responses
  - Monitor, report, and evaluate