

PRELIMINARY ASSESSMENT REPORT

Complaint Regarding IFC's Proposed Investment in Celulosas de M'Bopicuá and Orion Projects, Uruguay

November 2005

Office of the Compliance Advisor/Ombudsman International Finance Corporation/ Multilateral Investment Guarantee Agency

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LIST OF ACRONYMS

Office of the Compliance Advisor/Ombudsman	CAO
International Finance Corporation	IFC
Multilateral Investment Guarantee Agency	MIGA
Non-Governmental Organization	NGO
Center for Human Rights and Environment in Argentina	CEDHA
Empresa Nacional de Celulosa España	ENCE
Celulosas de M'Bopicuá	СМВ
Elemental Chlorine Free	ECF
Air Dried Pulp	ADP
Environmental Assessment	EA
Environmental Impact Assessment	EIA
Commission Administration of the Uruguay River	CARU
Environmental and Social Impact Assessment	ESIA
Cumulative Impact Study	CIS
World Bank Operational Procedure	OP

1. Introduction

The Office of Compliance Advisor/Ombudsman (CAO) is the independent recourse mechanism for the International Finance Corporation (IFC) and the Multilateral Investment Guarantee Agency (MIGA) of the World Bank Group. The CAO reports directly to the President of the World Bank Group, and its mandate is to assist in addressing complaints from people affected by projects in a manner that is fair, objective, and constructive and to enhance the social and environmental outcomes of projects in which IFC and MIGA play a role. In the first instance, complaints are managed through the CAO's Ombudsman function.

The purpose of this assessment is to:

- 1. Provide an objective analysis of the reasons behind the current dispute; and
- 2. Understand the context and explore options to assist parties to achieve resolution of this complaint.

This assessment is not a formal compliance audit of IFC's or its client company's adherence to established policies. The assessment report presents facts, gathered by the CAO during assessment, about activities that relate to and address concerns raised in the complaint.

1.1 The complaint

On September 23, 2005, CAO appraised a complaint signed by over 39,000 people in both Argentina and Uruguay and supported by the Argentinean NGO Center for Human Rights and Environment (CEDHA). The complaint was accepted on the basis that it met the CAO's eligibility criteria.

The complaint relates to two large paper pulp projects, sponsored by Grupo Empresarial ENCE – a Spanish firm – and Oy Metsa Botnia – a Finnish firm – on the Uruguayan side of the Rio Uruguay. The ENCE project is titled "Celulosas de M'Bopicuá" (CMB) by the IFC, and the Botnia project is titled "Orion" by both IFC and MIGA. The Orion project is currently being considered by both IFC and MIGA as a potential client. The ENCE project is being considered by IFC as a potential client. Neither project has yet been approved by IFC's Board. The projects are at an early stage of construction having received approval from the Uruguayan authorities. From a local perspective, the complainants are deeply concerned that the pulp mills will be harmful to their health, their environment and the tourism industry on which their municipality depends. They believe that air and water emissions from these two mills will be highly toxic, noxious, and incompatible with scenic tourism or agricultural productivity. There is also deep concern that the existing regulatory authorities have neither the will nor the capacity to monitor and enforce their commitments to meet acceptable standards. The fact that the projects are in one country but that their impacts might be felt across the border in another exacerbates these tensions.

Specific concerns and requests expressed to the CAO are to:

 Consider whether there has been adequate consultation with affected people, and if the concerns raised by these communities have been adequately addressed;

- 2. Investigate whether the project sponsors properly conducted and presented the Environmental and Social impacts of these projects on both Uruguay and Argentina, particularly analyzing whether the project sponsors considered whether these projects would place at risk the way of life/quality of life and livelihoods of the Fray Bentos and Gualeguaychu communities and that the CAO give its opinion on this matter;
- 3. Recommend whether an independent international panel is appropriate;
- 4. Convey to the IFC the extreme public concern over the social and environmental impacts of these projects; and
- 5. Consider auditing this project to evaluate compliance with IFC safeguard and disclosure policies, international waterways, Pollution Prevention and Abatement Handbook and international and bilateral agreements between Argentina and Uruguay.

The complaint requests the CAO to 'use all of its powers and faculties to ensure that the IFC Board of Directors cease all further consideration of financing these projects'. In an addendum to the complaint, the complainants request that the CAO consider the role of MIGA, as well as that of IFC in the complaint.

The CAO undertook a field assessment of the complaint between October 9 and October 14, 2005, during which it visited communities in Gualeguaychu and Fray Bentos (in the vicinity of the projects), Mercedes, Montevideo (in Uruguay) and Buenos Aires (in Argentina). A summary of people interviewed is presented in Table 1.

Table 1: People and Groups Interviewed, CAO Assessment Trip

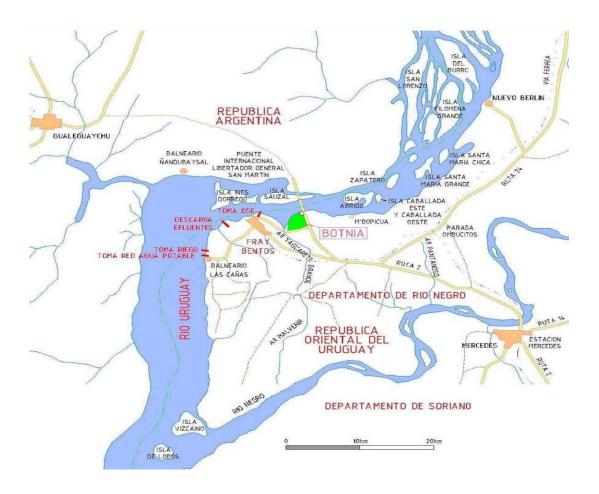
Table 1. Feople and Groups interviewed, CAO Assessment Trip				
People/Groups Interviewed	Date of Interview/Meeting			
Gualeguaychu				
CEDHA	10 – 14 October			
Representative from Gov. Busti's office	9 October			
Representatives of the Gualeguaychu Assembly	10 October, 13 October			
Montevideo				
Representatives of Botnia				
Representatives of the bi-national commission and the	11 October			
central government in Montevideo	11 October			
Representatives of Uruguayan NGOs				
Frey Bentos				
Representatives of Uruguayan civil society in Fray Bentos				
Representatives of ENCE				
Representatives of complainants associated with forestry				
plantations	12 October			
Concerned civil society groups in Mercedes				
Representatives of the local government in Frey Bentos				
Vice-governor, Entre Rios				
Buenos Aires				
Representatives of the bi-national commission and the	14 October			
central government in Buenos Aires	14 0010001			

In addition to these meetings, CAO held a number of face-to-face meetings with the IFC project team and IFC staff. CAO had full access to IFC documents and co-operation with IFC's specialists associated with these projects.

1.2 Background

The IFC is currently considering investment in both the Orion and CMB pulp mills projects. The projects are at an early stage of construction, having received permits from the government of Uruguay.

Figure 1. Map of Fray Bentos Area



1.2.1 ENCE

ENCE is a multinational firm originating in Spain. ENCE has been operating in Uruguay for more than 15 years in a number of locations. The ENCE operation at M'Bopicua

began as a woodchip and port facility. In October of 2003, the installation of the pulp mill was authorized¹ by the Uruguayan government.

The proposed project, titled by IFC as Celulosas de M'Bopicuá (CMB), is a greenfield eucalyptus kraft pulp mill, which will use Elemental Chorine Free (ECF) technology. The site for the CMB mill is in the Rio Negro district in Uruguay, 12 km north of Fray Bentos. The proposed ENCE facility will produce 500,000 tons of air-dried pulp (ADP) a year², the primary raw material for the production of paper and paper-related products. The total cost of the project is expected to be US\$660 million, with a possible US\$200 million investment from IFC, through both type "A" and "B" loans.

ENCE has had some negative environmental incidents reported against it in its home country of Spain. IFC is aware of these environmental and reputational issues.

1.2.2 Botnia

Botnia is a Finnish multinational corporation. Botnia was founded in 1973 and has five pulp mills in Scandinavia, making it Europe's second largest pulp producer. It has no prior experience in Uruguay. Botnia's investigation into a possible pulp mill facility in Uruguay was announced October 24, 2003³.

The proposed project, titled Orion, is also a greenfield eucalyptus kraft pulp mill, which will use Elemental Chorine Free (ECF) technology. The site for the mill is in Fray Bentos, Uruguay. This mill will also produce the primary raw material for the production of paper and paper related products with a capacity of 1,000,000 tons of ADP a year⁴. The total cost of the project is US\$1.2 billion with a possible IFC investment of US\$200 million through both type "A" and "B" loans.

1.2.3 Gualeguaychu Assembly

The Gualeguaychu Assembly is a highly mobilized grass-roots social movement against the two paper mill projects in Gualeguaychu (c. 80,000 inhabitants, rising to nearly c.200, 000 during its annual festival). Records indicate that the first opposition to development of paper mills arose in 2003⁵. Opposition has significantly grown since that time. Over 30,000 local people from both Argentina and Uruguay participated in a protest march in April 2005 on the bridge over the Rio Uruguay. There is a concerted effort amongst local tourism operators to inform visitors about the proposed developments.

The Assembly has catalyzed the participation of a number of nationally respected academics and researchers to undertake a comprehensive social and environmental impact assessment of the paper mill projects. The quality and sources of the data upon which their current analysis is based is not clear. However, these participants have substantial local trust.

⁴ Orion- EIA Exec Summary, p. 1

¹ CMB exec summary EIA p. 3

² CMB exec summary EIA p. 6

³ Orion- Disclosure Dates

⁵ The Declaration of Gualeguaychu, September 2003 states absolute community opposition to the ENCE project. The Botnia project only became public knowledge later in 2003.

Over the last few years, Guelguaychu has rapidly developed as a tourist destination within Argentina. The annual Festival has been central to this growth and the town has a well defined strategy to promote tourism development that includes nature tourism. The expanding tourism community gives the Assembly considerable local as well as national (in Argentina) support.

2. Assessment Findings

2.1 Policy Context

The IFC's Safeguard Policies require that proposed projects with significant social and environmental impacts are subject to formal procedures for both disclosure and consultation with project-affected people. Particular requirements are defined in the IFC's Operational Policy 4.01 on Environmental Assessment (EA)⁶ and IFC's disclosure policy.

The OP 4.01 requires that the client's social and environmental impact assessment documents – if already available – are reviewed by the IFC and then, if considered to be adequate for the purpose of disclosure, posted on the World Bank InfoShop and IFC's website. This disclosure is a critical part of the IFC's project appraisal procedure in that it triggers a 60 day period (in the case of Category A⁷ projects) of public scrutiny, only after which the IFC's management may submit the proposed project for consideration of approval by the World Bank Board.

The policy is explicit in the case that the project sponsor has already completed their EA prior to IFC involvement in the project. Under these circumstances, 'IFC reviews the public consultation and disclosure carried out by the project sponsor during and after EA preparation. If necessary, IFC and the project sponsor then agree on a supplemental public consultation and disclosure program to address any deficiencies identified by IFC. On completion of the supplemental program the project sponsor prepares a report detailing the results of the full public consultation and disclosure program. The Category A EA will only be made available to the World Bank's InfoShop once this report is complete.⁸

IFC's policy on disclosure further notes that: 'IFC staff must be satisfied that the EA report is complete in all material respects before releasing it to the InfoShop, the sponsor may be required to provide supplements and addenda to the EA report before the disclosure period commences.'

In addition to this disclosure period which normally comes towards the end of IFC's due diligence process, OP 4.01 also requires consultation with affected people in a way that is both meaningful as well as culturally appropriate. OP 4.01 identifies that the project sponsor must consult with 'project-affected groups and local nongovernmental organizations about the project's environmental aspects and takes their views into account.'

This consultation period is expected to occur earlier in the project development process. The policy requires that 'consultation occurs at least twice: (a) shortly after the environmental screening and before the terms of reference for the EA are finalized and (b) once a draft EA report is prepared. In addition, the project sponsor consults with such groups throughout project implementation, as necessary to address EA related issues that affect them."

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⁶ OP 4.01

⁷ OP 4.01 paragraph 8a

⁸ OP 4.01 paragraph 13

2.2 Project Experience

2.2.1 Adequacy of the EIA documentation

The EIA documentation for the Orion project – which was developed after the CMB project – contains an assessment of cumulative environmental impacts based on air and water emissions from both projects. These assessments state that environmental impacts from the projects will not be significantly perceptible to people in Argentina. In addition, they state that the combined emissions from both projects are within the acceptable European standards. The impact assessments do refer to the occasional release of malodorous vapours (described as 'similar to the smell of a skunk' in Orion's EIA summary). Each company suggests that this is unpredictable but may occur 2-3 times over the course of each year, for a period of a few hours on each occasion. Both companies do not believe that these vapours will be detectable to residents in Argentina.

Botnia has suggested the creation of an independent monitoring programme with the participation of local people in Uruguay. There is also a commitment to 'self-monitoring' on a daily basis as well as monitoring by Uruguayan regulators.

Significant incidents of disclosure and consultation promoted by the CMB and Orion projects are presented in Annex 1.

2.2.2 Adequacy of IFC's due diligence and appraisal processes

Key milestones in IFC's considerations of the projects are:

Item	Orion	CMB
Early Review	August 10 2004	December 15 2004
Mandate letters signed	24 February 2005	December 16 2004
Environmental Disclosures at	April 20 2005	July 29 2005
World Bank InfoShop		
Investment Review Meeting	May 4 2005	Not Yet

At the time of writing, the Environment and Social Clearance Memorandum for the Botnia project had not been completed by the Environment Department. IFC have provided official notification to Argentina under O.P. 7.50 (International Waterways Policy).

At some point – after the release of the Orion EIA but before the release of the CMB EIA – the IFC recognized its requirement to conduct a cumulative impact study (CIS) that would take into account the possible additional impact of having two projects operate in close proximity. The IFC also recognized, at this stage, that it should include possible impacts of the projects on people and the environment in Argentina. However, according to the complainants as well other observers, the CIS required by IFC and begun during July-August 2005 rapidly lost credibility when the leader of the study publicly conveyed that the study was a formality and IFC had already decided to invest in the two projects. On September 21, 2005, IFC announced that the CIS had been relaunched under its own management and stated that it has not, in fact, made any

decision over whether or not to invest in these projects. This study is currently in progress.

Additional consultation was undertaken with IFC's involvement during August 2005 as part of the cumulative impact study. Only during this latter consultation period are issues of concern with respect to potential impacts on the tourism industry acknowledged.

2.2.3 The national and international permitting processes

The framework for managing bi-national issues affecting the Rio Uruguay is defined through the Commission Administration of the Uruguay River (CARU). CARU was constituted by the "Statute of the Uruguay River" and subscribed to both Argentina and Uruguay on the 26 of February of 1975. CARU comprises a group of experts from Uruguay and Argentina. CARU typically deals with issues of navigation, but does have responsibilities that extend to water quality. Initially, the companies and government of Uruguay made some notification to CARU. Subsequently, some discussion and negotiation related to the projects occurred under CARU's auspices. For reasons that are not clear, this body was unable to address the concerns raised and in March 2005 the Presidents of both countries established a Bi-national commission to work towards a solution to the impasse that had been reached. The Bi-national commission was technical and voluntary. Its recommendations were not binding on either party. Amidst some recrimination on both sides, the Orion project was permitted to begin construction whilst the Bi-national commission deliberated. The Bi-national commission has failed to meet and there has been an escalation in tension surrounding the projects. The CAO understands that there has been a renewal of engagement under this commission with a meeting held during November 2005.

The complainants, together with their representatives in the local and national government as well as CEDHA, believe that they have a strong legal case against the permitting of these projects. CEDHA believe that existing bi-national agreements between Uruguay and Argentina – which require consultation over significant projects which may affect the Rio Uruguay – have not been adequately respected. Some parties within Argentina are arguing strongly for the case to be considered by the International Court of Justice and the Inter-American Court of Human Rights.

For their part, the Uruguayan authorities believe that appropriate notifications had been made, and that existing bi-national agreements do not contain the types of obligations on the parties as is currently being asserted. The primary line of argument rests on whether or not the threshold for 'significant impacts' to trigger the requirements for notifications under CARU has been met. Based on their understanding of the Environmental Impact Assessments from the two projects, the Uruguayans argue that the projects do not represent a significant impact to Argentina or the joint waterway.

3. CAO Findings

3.1 Adequacy of the EIA in identifying people potentially affected by these projects

Based on its own reviews, the CAO finds that the EIAs for the pulp mills do not adequately address the concerns of potentially affected local people. In particular:

- the EIAs do not provide sufficient evidence that concerns related to potential impacts on tourism and agriculture have been addressed;
- there is little evidence presented in the EIAs that potentially impacted enterprises or individuals (such as tourism operators and fishermen) particularly from Argentina, have been consulted;
- the EIAs do not consider broader cumulative impacts beyond environmental emissions such as the social and environmental consequences to land-holding and social equity as a result of both mills developing large eucalyptus plantations in Uruquay.

The argument has been put forwards that Argentine residents were not consulted because they are not likely to be impacted. The CAO does not concur with that opinion. The complexity and sensitivity of these major projects in a trans-boundary area and on a shared river basin make consultation with potentially affected people essential.

3.2 Adequacy of IFC's due diligence and appraisal process

In working to resolve initial concerns by complainants IFC recognized the need to undertake the CIS. However, this determination came only *after* the public disclosure of the project EIA documentation on the World Bank InfoShop. There was no corrective notice posted at this time nor was there any indication that the Board dates presented in the public disclosures had changed. From an external perspective, the appearance was, until after the complaint was lodged with the CAO, that IFC expected the projects to be approved by the Board by October 15 2005.

It is not clear to the CAO how the IFC assured itself that the disclosed environmental documentation from either project was of adequate quality to be released to the public in April and July 2005. Specifically, the IFC does not appear to have:

- Required that each individual EIA more formally address whether or not people, the environment or any local livelihoods in Argentina may be impacted by the projects; and
- Required a comprehensive assessment of cumulative impacts as part of its review of the Orion project (since this project was defined after the CMB project).

Both of these requirements should have been completed prior to posting the Orion and CMB EIA's at the World Bank InfoShop website and therefore starting the 60-day disclosure period prior to consideration by the World Bank Board.

There are considerable differences in the application of the appraisal process by IFC and MIGA – both of whom are part of the World Bank Group and both of whom are considering support to the Orion project. MIGA has completed its appraisal process. It has concluded that the Orion project meets MIGA's requirements and that no further

studies are necessary. This contrasts with IFC's approach, where a CIS was deemed critical to further decision-making.

3.3 Permitting procedures

With respect to permitting procedures and requirements for notifications between Uruguay and Argentina related to these developments, the key parties agree that the process and bi-national capacity for resolving these complex issues has not been effective at achieving an equitable outcome to the dispute.

The CAO finds that the decision by one of the project sponsors to begin construction when the Bi-national commission was still reviewing these developments has undermined the legitimacy of existing protocols in the eyes of potentially affected groups in Argentina as well as Uruguay. The development is currently perceived as a *fait accompli* which the complainants believe can now only be challenged through protest and, potentially, legal action.

4. Conclusions and Recommendations

The Assembly in Gualeguaychu has become a powerful and coherent voice which has raised legitimate questions about how best to promote development on the Rio Uruguay between Entre Rios and Uruguay. Parties on all sides of this debate have stated that unresolved questions need to be addressed and that the current framework for cooperation and planning of development in the region must be improved.

The consultation and disclosure processes related to approvals for these projects give the impression of being rushed, and presented as a *fait accompli* to those being consulted. Too little emphasis has been placed on the trans-boundary nature of the possible impacts of these developments and there has not been sufficient acknowledgement of the legitimacy of concerns and fears of communities that are local to the project.

Further technical information and scientific facts will not be sufficient to address the lack of trust that currently exists amongst those who are concerned about the projects. Specific efforts must be implemented in order to ensure that people who believe that they will be impacted are able to have trust in the process as well as outcome of any additional studies.

Key substantive issues and concerns raised by this complaint are:

- How to credibly and comprehensively address the question of what the impacts of these proposed projects are likely to be, who will be impacted by them and how to address the question of compatibility between tourism development and large-scale industry on the Rio Uruquay;
- How to ensure that the IFC's project approvals process is respectful of and safeguards the interests of local people; and
- How to ensure that the legal as well as administrative arrangements for planning, monitoring and enforcing the trans-boundary aspects of these projects, and that they are effective, well resourced and accountable.

4.1 Recommendations

The CAO believes that there are opportunities for agreement and movement on these issues. It is critical now that the IFC act decisively to assure citizens of both Argentina and Uruguay that it has embarked on a credible process of due diligence with respect to its assessment of the cumulative impacts of both projects. The IFC must demonstrate that it is bound to use this information in making a decision whether it will or will not support these projects. In addition to steps it has already taken, the CAO recommends that:

- 1. The consultation and disclosure periods are kept separate and not confused. CAO requests that the IFC define and make public, both the <u>consultation</u> period required completion of the CIS, as well as the <u>disclosure</u> period prior to the Board's consideration of these projects. The consultation period is required in order to ensure that the EIAs, CIS and other documents contain all information that is important to impacted people. Subsequently the disclosure period is necessary (after posting the completed documents to the World Bank InfoShop) to allow any further formal objections prior to consideration of these projects by the Board.
- 2. The CIS should provide answers to the questions raised by the complainants about the magnitude and distribution of potential social and environmental costs, risks and benefits arising from these projects, but must do so in a way that is credible to the complainants. More fact, without efforts to build trust and address questions of integrity of process, will not be helpful. Specific process steps to be undertaken include:
 - a. Consultation in the design and implementation of the CIS ensuring full transparency of the Terms of Reference and that people's questions are addressed;
 - b. Ensuring that the highest caliber of independent, external expertise is engaged on this process to promote participation by people who have the trust of the complainant communities; and
 - c. Joint problem-solving approaches with regard to the design of appropriate mitigation measures that address the concerns that are raised. This should include concerns about the enforcement of regulations as well as whether or not an international regulatory panel should be invoked for these projects, but this discussion should not pre-judge the outcome of IFC's decision over whether or not it supports these projects.

Factually, based on concerns expressed to the CAO, the CIS should:

- a. Evaluate the technology and projected emissions from these projects against IFC's Safeguards and specific provisions of the Pollution Prevention and Abatement Handbook. It should demonstrate that Best Available Technology is being applied by both projects;
- b. Assess the potential receptors of impacts in both Argentina and Uruguay. It should specifically identify:
 - i. Potential impacts of water emissions on water quality and local as well as tourist fishing communities;
 - ii. Potential impacts of air emissions on agricultural productivity:
 - iii. Potential impacts of eucalyptus plantations on landholder equity as well as water availability;

- c. Definitively address the question of whether or not tourism and the pulp mills are compatible given the current proposals; and
- d. Assess whether or not it is possible to devise appropriate mitigation measures, bearing in mind the adequacy of the existing regulatory processes for managing potential trans-boundary impacts.

The CAO understands that these issues have already been raised to IFC through a number of different channels.

- 3. The CAO requests that IFC provide guidance and clarify to affected people its interpretation of OP 4.01 paragraph 3 which requires that the IFC's Environmental Assessment 'takes into account... the country's overall policy framework and national legislation... and obligations of the country pertaining to project activities, under relevant international environmental treaties and agreements.'
- 4. The CAO believes that greater clarity in relation to the application of social and environmental appraisal procedures by both IFC and MIGA will be helpful in assisting the dispute resolution process. Accordingly, the CAO will undertake a compliance audit of the adequacy of IFC's procedures to the point of public disclosures. This audit will also address the question of IFC/MIGA application of policy to the same client on the same project. This audit will be commissioned immediately and should be completed within a month. CAO will work with the parties to ensure that the findings of this audit are well understood and that it is helpful in addressing concerns.

ANNEX 1: Disclosure and Consultation Activities of Sponsor Companies

A. CMB/ ENCE

Date	Event	Attendance	Notes	Location
July 15, 2002	Senate's			Montevideo
	Environment			
	Commission			
July 16, 2002	Eufores- Direction			Montevideo
	and Support			
	Forest Producers			Montevideo
	Association			
July 17, 2002	Minister for			Montevideo
, ,	Housing., Planning			
	and the			
	Environment,			
	DINAMA Director			
	and staff			
	DINAMA room			MVOTMA,
				Montevideo
July 18, 2002	City Mayor and Rio			M'Bopicua,
	Negro			Fray Bentos
	Representatives			
	Estancia			
	M'Bopicua			
	City Mayor and			M'Bopicua,
	Soriano			Fray Bentos
	Representatives			
July 19, 2002	CARU			CARU,
001, 10, 2002	G7 11 13			Paysandu
				,
	Departmental			Las Canas,
	Council			Fray Bentos
	Committees			", "
	Departmental			Las Canas,
	Council			Fray Bentos
	Committees			
July 20, 2002	Eufores Local Staff			Club Union,
				Fray Bentos
	Local Press			Fray Bentos
	Local			Fray Bentos
	Environmental			
	NGO			

July 22, 2002	PIT-CNT		Since 2003, CMB has kept a permanent panel meeting with a group of representative of the PIT/ CIT, a trade union association that gathers all of the country's labor union. This panel consists of representatives for the wood union (SOIMA), the port workers union (SUANP), the metalworkers union	
July 26-27, 2002	Pulp Production Seminar	Technicians at the National Environment Agency and the Technological Laboratory of Uruguay.	(UNTMRA), the paper workers union.	Montevideo
Nov. 2002	DINAMA	DINAMA technicians involved in the evaluation of the EIA Report of CMB and environmental experts of the ENCE plants in Pontevedra and Navia.		
June-July 2003	Open House			Downtown Location, Fray Bentos

July 21, 2003	Public Hearing	National Director for the Environment, the Director of the Environmental Impact Assessment Division and the City Mayor for Rio Negro, a numerous audience representing different sectors of CMB's area of influence.	Hearing lasted 6 hours. The mechanism of the hearing was described by the environmental authorities; CMB presented the project and its environmental impact assessment to the community. Written questions posed by the audience were collected and read. There was some time during which the attending audience was able to present their concerns.	Fray Bentos
January 20, 2005	Televisión Española			
March 4, 2005	Agregados navales			
April 3, 2005	Ministro de Transporte y comitiva			
April 14, 2005	Pulpwood conference			
April 26, 2005	Embajadora de Canadá y comitiva			
May 20, 2005	Diputados y ediles del Movimiento de PP			
June 3, 2005	Diputados y ediles de Paysandú- PNacional			
June 6, 2005	Subsecretario Igorra y comitiva, Consejera Económica Comercial de España, M.Peña			
June 21, 2005	Subsecretario Igorra, Diputados Patrone y Varela			

July of 2005	Presentación a Cuerpo Diplomático de Uruguay, Ministerio de Relaciones Exteriores		
August 11, 2005	Prensa de Montevideo		
August 12, 2005	Senador Rafael Michelini		
August 17, 2005	Representantes de Uruguay-Caru – Presidente y Gerente de la Sociedad de Productores Forestales		
August 22, 2005	Directorio de Administración Nacional de Puertos		
August 28- September 2, 2005	Stakeholder Consultations with IFC		
August 30, 2005	FEMESA – ONG de empresas españolas en Uruguay		
August 31, 2005	Comisión de Medio Ambiente de Diputados		
August of 2005	Participación en Exposición Rural del Prado		
August of 2005	Participación en el programa de TV "Americando"		
September 9, 2005	Comisión de Legislación y Trabajo de Diputados		
September 21, 2005	Junta Departamental de Paysandú		
September 28, 2005	Periodistas de BBC		

September 30, 2005	Ministro de Trabajo y comitiva		
October 12, 2005	Delegación del CAO		
October 20, 2005	Diputados Mañana y Borsari		
October 21, 2005	Presidente en ejercicio, Nin y comitiva		
October 26, 2005	Comisión de Medio Ambiente del Senado		
October 28, 2005	Cónsul de España y Comitiva		
November 3, 2005	Directores del BID		
November 7, 2005	Directorio de ANTEL		

Orion/Botnia

Date	Event	Attendance	Notes	Location
October 24, 2003	First Media Press Release	Sent to all Media.		
October 30, 2003	First Press Conference	Media from Paysandu, Rio Negro, Soriano and Montevideo; Mayor of Rio Negro; More than 65 people.		Club de Golf, Montevideo
November 4, 2003	First Meeting with NGOs	67 NGOs were invited, 5 attended-Red Uruguaya de ONG Americana's, Vida Silvestre, Sidur Linea Verde, Seinco y Faunaa; EIA group.		Hotel Ibia, Montevideo

November 5, 2003	Informative		
	Meeting with Rio Negro	More than 150 people including Mayor of Rio Negro, soriano; Media from Riio Negro, Soriano and Montevideo tv channels.	Club Union Oriental, Fray Bentos
December 2, 2003	Public Forum, Rio Negro	More than 250 people including mayor of Soriano; media from Rio Negro and Soriano.	Club Union Oriental, Fray Bentos
Febuary of 2004	First Journalism Tour	Diario El Dia, El Pais, El Observador, La Republica, El Rionegrnse, Diario Accion, Nuevo Berlin Cable Canal, Radio Rincon, El Telegrafo, Vecino de Fray Bentos.	
March of 2004	Scientific Seminar	Fray Betos- Las canas: 40 participants; Montevideo- Sheton: 450 participants.	Fray Betnos and Montevideo
March of 2004	Informative Meeting	70 people, including people from MOVTIDES.	Merceds, Casa de la Cultura
March 1, 2004	Informative Meeting	More than 300 people.	Fray Bentos
May 26, 2004	Informative Meeting in Fray Bentos Press Conference		Club Union Oriental, Fray Bentos Club de
May 27, 2004	in Montevideo		Gold, Montevideo
June of 2004	First and Second Journalistic FAM Tour	Weekly Busqueda, El Pais Agropecuario, CX 8 Sarandi, Ultimas Noticias, Magazine Caras y Caretas, Radio CX 14 El Espectador, ICI, Radio Litoral.	

August of 2004	First Edition of the			
	Magazine <i>Espacio</i> <i>Botnia</i>		23,500 copies were printed; distributed to Rio negro, Soriano, Paysandu, Entre Rios, National Authorities, Press.	
August 1-8, 2004	First Authorities Delegation	Rio Negro Mayor; Soriano Mayor, Paysandu Mayor, CARU, DINAMA, Entre Rios; Partido Colorado, Frente Amplio, Partido Nacional, Partiado Independiente, Representatice de Botnia en Uruguay.		
December 21, 2004	Public Hearing, Club Armonia			Club Aromina
July 18, 2005	Radio and TV ads run			
August 28- September 2, 2005	Stakeholder Consultations with IFC	Ministerio de Relaciones Exteriores, Seretaria de Ambiente y Desarrollo Sustentable, British Embassy, ACAG, Ministerio de Economica y Finanzas, Ministerio de Relaciones Exteriores,a Metsa Botnia, CARU, Guayabira, Comision Multisectorial, ENCE, Ministerio de Industria, Ministerio de Economia y Produccion.		