

SOME RESPONSES TO THE QUESTIONS AND ISSUES RAISED BY THE NGO GROUP

Question: Project construction commenced in 2006 in flagrant violation of Ethiopian environmental law. No project documentation addresses this issue or evaluates the impacts/ legacy of the project construction to date. The Bank has not identified any concerns about this violation or how Bank involvement could be affected by this egregious violation.

Response: According to information available to us, the initial ESIA was based on preliminary level design and submitted in June 2006 to EEPCO (as the Client) and ELC (Owner's Engineer) for their review and comment. According to EEPCO, the ESIA report couldn't have been submitted to EPA until the final level design was ready. Based on the recommendation of the ESIA report and also EEPCO's EMU and the Owner's Engineer's comments, the additional studies had to be commissioned and these included:

- a) Additional work on the ESIA
- b) Additional Study on Downstream Impact Assessment
- c) Resettlement Action Plan
- d) Environmental Management Plan

The revised ESIA reports together with the additional study reports were submitted to EPA, AfDB and WB for their review. Following the review of these documents, comments were made and submitted to EEPCO to address some of the issues raised including the cumulative impacts of the cascade of dams on the Omo River.

We have been informed that EEPCO has completed the additional studies.

It should be noted that the Bank's involvement could not proceed without EPA issuing approval.

Question: The project poses serious social and environmental impacts which are not sufficiently acknowledged or addressed by project documentation. The ESIA misrepresents project benefits and risks and is of overall poor quality. Analysis is often simplistic and conclusive statements are consistently made without a reasonable basis. Risks to health and livelihoods of affected communities are particularly poorly addressed. Comprehensive baseline studies have not been conducted. Mitigation measures are inadequate, unrealistic and do not acknowledge the failure of similar mitigation measures used at Gilgel Gibe Dam.

Response: The reports have recognized the seriousness of social impacts of the project hence their discussion in various reports. It is also a fact that although the Gibe III project is one of the largest hydroelectric projects ever undertaken in the country, the impact from the reservoir in terms of population displacement is very small. This is because the impounded water will be confined within the gorge of the river far from large population settlements.

All of these potential impacts are sufficiently addressed in the following reports:

- a) Chapter 7 of the main ESIA
- b) Chapter 5 of the ESIA: Additional Study on Downstream Impact
- c) Chapter 6 of the Resettlement Action Plan, and

d) Chapter 4 of the ESMP

Appropriate, adequate and acceptable mitigation measures have been proposed and costed to be implemented.

Question: Indigenous communities of the Lower Omo Valley are placed at great risk due to project impacts to flood recession cultivation practices. These impacts and risks are severely underestimated and proposed mitigation is likely to fail to restore their quality of life. The role of flood recession cultivation in the food security and local economy of the entire valley is not accurately reflected in project documents. Risks to the valley's economic and social system could affect between 200,000 and 500,000 people from vulnerable ethnic communities.

Response: Flood recession and riverine delta cropping is indeed important in all four Woredas (Hamer, Salamago, Nyangatom, and Dasenech). Sections 2.3.4, 2.3.5, and 2.3.6 of the Additional Study on Downstream Impact Report have covered these issues in depth. However, it is reported that for most people, the grain produced from these cultivations is only sufficient for 3 - 6 months. Thereafter, they depend on food aid from the government and NGOs. Hence the Social Development Program which includes irrigation agriculture has better potential for food security.

As explained in the Additional Study Report and based on the information obtained from the Wereda Administration Offices, the estimated total population of the lower Omo (in the 4 weredas) is 131,433 (See the Table below) and of which 124,660 are rural. The estimated HH is 28,713, of which nearly 50% are dependent on recession agriculture.

Table: Rural & Urban population by sex (2005) (See Page 67 and 79 of D/S report)

Woreda	Total Population	House-holds
Salamago	19,332	5,008
Dasenech	46,479	9,312
Nyangatom	22,117	4,278
Hamer	43,505	10,115
TOTAL	131,433	28,713

Question: There are legitimate fears from within Ethiopia that NGOs, affected communities, and academics who express critical concerns of the project risk government retaliation. No action has been taken to ensure affected communities and the Ethiopian public are well-informed and able to express their views on project impacts without fear of government reprisal. There is virtually no public awareness of the project, project impacts nor access to project information in the country. Consultations with affected communities have included relatively few individuals; many affected peoples remain completely unaware of the impacts posed by this project. Consultative surveys meant to be completed by indigenous tribes in the Lower Omo Valley were reportedly filled out by local officials without the knowledge or input of the communities. Potentially affected communities in Kenya have not been consulted at all. Public consultations

are reportedly ongoing and ESIA related documents still undergoing revision, but the leverage of affected communities to ensure concerns and impacts are addressed is severely hampered because project authorization has been given and construction started. Communities will have little recourse to ensure that issues brought up in ongoing consultations are sufficiently addressed.

Response: The PCDP report documents the Consultant's initiatives to inform and consult with affected communities, with local, regional and national government officials and agencies, and with interested groups and Non-Governmental Organizations (NGOs). The report also describes how these efforts will be continued as the project transitions from construction into operation.

More than 136 meetings and discussions were held with members of the community and their leaders drawn from various sectoral ministries at regional level. Over 1,750 people comprising 869 community members, 203 Zonal and Wereda officials and 409 members of Kebele Peasant Associations were consulted through community discussions; and 268 individual household heads were consulted privately. In addition, extensive consultations have been conducted as part of the Downstream Impact Assessment and preparation of a Resettlement Action Plan (RAP). Figures 5.1 and 5.3 of the PCDP report show the locations of public consultation meetings around Gibe III dam and reservoir and downstream sites.

As part of continued **disclosure policy**, the following is intended:

- (a) a ***National Consultative Workshop***: Now that the ESIA drafting is completed, the project will organize a national consultative workshop to bring all key players together where they will have an opportunity to express their views and concerns on the project and its impact and discuss the contents of the reports and contribute to its improvement and finalization; and
- (b) creation of a ***Permanent Project Web Site***: The project will design, host and maintain a project web site throughout the life of the project. This electronic medium will serve as a permanent promotion, information and public relations forum for the project making it easier to reach out both national and international stakeholders and address their concerns in addition to equipping them with accurate and up-to-date information about the project and its progress.

Question: Reservoir fishing was also considered a benefit of Gilgel Gibe Dam, but a ban on fishing has since been established there.

Response: According to available information there are currently more than ten Fishermen Associations from three nearby weredas who are benefiting from the fish resources in the reservoir. It is hoped that these fishing communities and many more will benefit from the expanded reservoir when the dam is completed.

Question: Some 275 Hadiya nomadic households (about 1,400 people) will lose grazing lands in the reservoir region (as identified in a 2006 version of the EIA) but the current ESIA states they will not be negatively affected, nor will receive any compensation.

Response: Contrary to the information provided in the 2006 ESIA, these people are not nomads, they are agro-pastoralist communities. To compensate for the loss of grazing land to flooding in these affected weredas, the project will ensure that these communities will benefit from the recommended buffer area development plan which is integrated with forage improvement and development program. Improvement of the veterinary services in project affected pastoralist areas is also one of the recommended interventions meant to partially offset potential negative impacts stemming from loss of benefits from the natural vegetation in the area. Furthermore, to compensate for the loss of the

traditional crossing points, the project will construct a bridge at the major crossing point across the Gibe River which will give the pastoralists an all-year-round access to grazing land which is not the case at the moment (See Figure 5.3 of ESMP report).