

FMO, Finance for Development  
ORET Programme  
To: Mr A. van Elteren  
P.O. Box 93060  
2509 AB The Hague  
The Netherlands

your reference

-

your letter of

12 July 2006

Our reference

068-018/Kh/Lw

Subject

Advisory review of the EIA for land reclamation  
Viligili, Gaafu Alifu Atoll, Maldives

direct dial

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Utrecht,

23 October 2006

Dear Mr van Elteren,

By e-mail, dated 12 July 2006, you requested the Netherlands Commission for Environmental Assessment (the Commission) to review the quality of the Environmental Impact Assessment (EIA) report for construction of safe island Viligili, Gaafu Alifu atoll, Maldives.

It is my pleasure to submit herewith the Advisory review prepared by a working group of the Commission. I would like to draw your attention to the following:

Firstly, it is greatly appreciated that the advice on Terms of Reference for the EIA report for Vilufushi that has been prepared by the Commission (dd. 4 July 2005) was used as an important input for the Terms of Reference for the EIA for Viligili, approved by the Ministry of Environment dated 28 May 2006.

Secondly, the construction of safe island Viligili is the second out of five islands that will undergo similar interventions. The first safe island that has been constructed is Vilufushi. The monitoring executed during the construction of Vilufushi provided valuable information for new initiatives. Unfortunately, the lessons learned at Vilufushi have not completely been incorporated in the EIA report for Viligili, e.g. monitoring suspended material and sedimentation once every two days.

Thirdly, in general this EIA deals with the impacts of dredging, land reclamation and related activities, for which the proponent is responsible. In making a safe island, land reclamation is only a first step. Other activities such as land-use planning and construction of new infrastructure are necessary to achieve the overall objective. In our view, an EIA for the establishment of a safe island should ideally also consider these so-called follow-up activities. This provides greater opportunities to assess the various alternatives and mitigating measures simultaneously.

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At the same time, the people affected can be informed more easily. The proponent for this activity is the Ministry of Construction and part of the work will be executed by a private party, however the latter cannot be held responsible for all follow-up activities. It is recommended that the Ministry of Construction, the Ministry of Environment and the private dredging company co-operate in preparing one good EIA dealing with the establishment of a safe island.

Finally, it is recommended to execute an Strategic Environmental Assessment (SEA) for the (update of the) Safe Island Programme. Such an SEA can be used as a framework for future EIAs for construction of safe islands. Applying this framework will save preparatory time and costs in future assessments. In an SEA the selection criteria should be identified and the selection of safe islands should be done and justified in a transparent way. Induced or indirect impacts can much better be dealt with in SEA than in EIA. For example: (i) when the services on one safe island are strengthened, the quality and access to services on the other islands in the atoll may be affected and (ii) when the capacity of the harbour on the safe island is increased, larger boats will be used and an effect might be that smaller boats and their owners loose part of their work. The Commission is willing to provide assistance in this matter if the Ministry of Environment would decide to undertake such an SEA.

The Commission would appreciate to be kept informed about the use that is made of this advice.

Yours sincerely,

Klaas Jan Beek



Chairman of the Working Group EIA for the reconstruction of Viligili Island, Maldives

cc. Ministry of Environment and Construction, Ministry of Planning and Development, Ministry of Finance, Maldives

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