

To Abdul Rahman Fadhl Al-Eryani  
Ministry of Water & Environment  
P.O. Box 19237  
Sana'a  
Yemen

your reference

-

your letter of

8 July 2007

our reference

076-084/Kh/Lw

Subject

Advice on Guidelines for EIA's for the three  
Wadi projects: Wadi Surdud, Wadi Hassan and  
Wadi Bana

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Utrecht,

28 November 2007

Your Excellency,

In July 2007, you requested the NCEA to advise on EIAs for dam construction in the Wadis Surdud, Hassan and Bana. In a verbal explanation you asked the Commission to review the existing EIA reports, and if necessary, provide guidelines for supplementary information.

It is my pleasure to submit herewith, the Advice on Guidelines for EIA's for the three Wadi projects. I would like to draw your attention to the following:

First of all, I would like to express my appreciation for the organisation of the visit and the personal interest demonstrated by you and your staff and the staff of the Environmental Protection Agency.

This has allowed the Commission to receive necessary information in a short period of time, which helped us to find some answers in a very complex situation .

Since no ToR were available for the three EIA studies - that were part of the Feasibility Studies for the dam projects - we mutually agreed that we should take the information presently available, as point of departure for our review.

The Commission has concluded, that fundamental shortcomings in the present EIA's require the preparation of new EIA reports in accordance with the Environmental Protection Law(1995).

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We recommend an innovative approach, congruent with up to date international methodology, in particular the Millennium Ecosystem Assessment. The Wadi basins can be described as ecosystems providing multiple services for human well-being. Enhancing such services, in particular water storage and flood control, can go at the cost of these or other services in the river basin. Therefore an activity should in fact be consistent with a basin plan. Such a plan exists for the Abyan Delta parts of Wadis Hassan and Bana, but not for the upstream parts nor for the entire Surdud basin.

If a basin plan for Surdud can be realised in the foreseeable future, it is common practice that a strategic environmental assessment (SEA) is carried out parallel/integrated with the formulation of the basin plan. Basin plan and SEA provide boundary conditions for (subsequent) project formulation and EIA.

Much attention will need to be paid to the formulation of development alternatives for the dams, including the impacts of autonomous development without the dams on ecosystem services, and for different dam designs. We have encountered contradictory information on the required dam design for Wadis Bana and Hassan, with great influence on the economic feasibility and environmental sustainability of the dam projects. For Wadi Surdud we even recommend to study other development alternatives beyond the water sector, since a dam in this Wadi will only lead to water losses, in a situation where all water resources most probably are already overexploited. For autonomous development it is recommended to distinguish between two development scenarios for the next 10, 30 and 50 years, which also provides the opportunity to simulate different projections of climate change and its impact during the next decades. In addition, for comparison between the alternative development options, cost benefit analysis will be required.

I realize that our guidelines include several innovative EIA methods, which – at present – are becoming common practice internationally. During the meetings at your ministry it was suggested that these EIA's provide an excellent opportunity for capacity development. In view of the ongoing cooperation with our Commission we offer you our support in the introduction and implementation of these more advanced methods.

Yours sincerely,



Klaas Jan Beek  
Chairman of the Working Group of the Commission for Environmental Assessment

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