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Eingabe an die Exportkreditversicherungen

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Euler Hermes Kreditversicherungs AG, Deutschland

**Stellungnahme zum Ilisu Dam and HEPP Project:
Update of Environmental Impact Assessment Report (EIAR)**

Eingereicht von der Internationalen Ilisu Kampagne

Erklärung von Bern, Schweiz
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The Swiss Export Risk Guarantee and the Ilisu project consortium leader VA Tech invited interested stakeholders to submit comments to the new environmental impact assessment report (EIAR) of the Ilisu project 2005. These shall be incorporated in ERG's own assessment of the project.

In the name of the international Ilisu campaign [EvB, WEED (Germany), ECA-Watch Austria, Fern (Belgium) and The Cornerhouse (UK)], EvB commissioned Eawag, the Swiss aquatic institute of the ETH to provide an independent review of the EIAR 2005. Eawag has outstanding competence in the assessment of hydrologic and geomorphic impacts of large dams and studied the impacts of the first Ilisu project. The international Ilisu campaign also commissioned the US environmental consultant company Phil Williams and Associates (PWA), to compare the EIAR from 2001 with the new EIAR 2005. We enclose both reports and would like to draw your attention to the most important findings.

Comments on the applicable environmental law:

We would like to point out, that Turkey does have a new environmental law, but **because the Ilisu project design is still the same like in the eighties, the new Ilisu project 2005 is subject to the old law.** The Turkish law from the eighties did not provide for an environmental review. However the project sponsor, the Turkish Government, assigned the „Ilisu engineering Group (IEG)" to perform the relevant Environmental Impact Assessment Study in 1997. The new project consortium ordered a comprehensive update of the study in February 2005, which was made public on December 20, 2005.

We do appreciate that the EIAR has been updated.

- **However, it is not tolerable and in compliance with international standards that a dam project in the 21 century is subject to a 25 year old law, with very weak environmental regulations. It thus clearly violates international standards as set out by the Worldbank and the International Finance Corporation.**

Fundamental scientific shortcomings of the EIAR:

Eawag's independent evaluation of the environmental impacts of the Ilisu Project has faced **many problems mainly originating from the lack of data and information presented in the EIAR.** Information, figures and data provided in the EIAR was **often vague, incomplete or contradictory.**

The EIAR mentioned only briefly and rather theoretically some key environmental issues such as reservoir water quality, downstream effects or sedimentation, **but no reliable assessment of their impacts has been performed. Without knowing the degree of impacts, it is not possible to find solutions for minimizing the effects.**

Comments and doubts on the stated objectives of the Ilisu project:

According to the EIAR, Ilisu is a multi-purpose project. Apart from providing economic development within the region through the generation of electricity, it will store the annual

runoff of the Tigris River, elimination the risk of the floods and droughts. The executive summary of the EIAR states: "Only by these means unstable conditions can be controlled, in order to ensure agricultural cultivation and drinking water and to produce electrical energy." It also states that "...the Ilisu dam with a storage capacity of 10.4 billion cubic meter guarantees a minimum quantity of water to those people living downstream of the river during seasons when it is needed most. The dam adjusts the discharge of the Tigris and reduces the risk of inundations also in Syria and Iraq. Turkey committed to observe the guidelines concerning the minimum flow quantities.

- ➔ Based on findings by Eawag we want to point out that **these assertions do not comply with reality**. Considering the dam location, close to the Syrian-Iraqi border, the impacts of the Ilisu Dam construction on downstream hydrology, water quality and sedimentation should not be considered as only of local importance as it will also directly affect riparian areas. **Therefore, we demand that the assessment of environmental impacts includes transboundary impact analyses.**
- ➔ **Contrary to what the EIAR states, Eawag finds** that by storing the annual runoff of the Tigris River, the construction and the operation of the Ilisu Dam will **significantly affect the present natural hydrology and significantly reduce the downstream flow in Syria and Iraq.**
- ➔ Particularly in northern Irak along the Tigris, the cultivation of agricultural products is based on **recession farming, benefiting of the annual floods of the Tigris**. The constant and not predictable fluctuation of the water level as result of hydroelectric production, controlled by Turkey, would **make agricultural production impossible and thus ruin the livelihoods of the local farmers.**
- ➔ The EIAR has not looked at this important point. We have **not seen any evidence of a water agreement between Turkey and Irak taking into consideration the fate of the farmers along the Tigris**. The farmers in Irak have not been informed and compensation or measures for minimizing their losses are not foreseen in the EIAR.
- ➔ Eawag's assessment shows **that water quality related problems may increase due to increased reservoir eutrophication and may lead to unsuitable drinking or irrigation water.**
- ➔ Further consequence of such a large reservoir will most likely be cold water pollution, oxygen depletion, changes in water levels, high sedimentation in the reservoir and downstream erosion. **All these factors can be deadly for endemic fish population.**

- ➔ Changes in turbidity may affect the biota directly. **This reduction can also lead to the elimination of backwaters that provide aquatic habitat for native species and the reduction of riparian and wetland vegetation.**
- ➔ Daily operation variations of a powerplant will result in increased downstream erosion that will be detrimental for fish spawning areas and eventually for lotic species of fish downstream and eventually reduce the species and abundance of aquatic organisms
- ➔ Stagnant water and exposure of large area of the river bed can create perfect breeding condition for mosquitoes, vectors of malaria and yellow fever and the water flea host of the guinea-worm.

Based on the assessments by Eawag and PWA, we cannot regard this EIAR version as ready for decision making on granting export credit guarantees and start project implementation.

We recommend that the assessment of environmental impacts will be done again, be based on transparent scientific figures and include our reservations. Also, an impact analyses of transboundary impacts should be performed.