



commission for environmental impact assessment

FMO, Finance for Development
ORET Programme
To: Mr. A. van Elteren and Mr. R. van den
Berg
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your reference	your letter of	our reference
-	31 March 2005	060-030 Sh/Mz
subject	direct dial	Utrecht,
Advice on Terms of Reference for the EIA of Land Reclamation Vilufushi, Thaa Atoll, Maldives	+ 31 30 234 76 54	4 July 2005

Dear Mr. Van Elteren en Mr. Van den Berg,

By e-mail, dated 31 March 2005, you requested the Netherlands Commission for Environmental Impact Assessment (EIA) to advise on Terms of Reference (ToR) for an EIA for the reconstruction of Vilufushi Islands in the area of Thaa atoll, Maldives.

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

The Commission realizes that this project has been developed under special circumstances as a result of the tsunami disaster. Therefore, speedy execution is needed to remedy the difficult situation in which the Vilufushi residents are living at the moment. This implies that most of the data for the EIA study will have to be gathered at short notice and will have to be limited to the most relevant ones. The Commission is of the opinion that, in case data are not readily available (eg. on currents or erosion/sedimentation patterns), the use of 'expert judgement' is justifiable. Although the project involves a fairly big infrastructural operation, the scale is relatively small as compared to the scale of the Thaa atoll. Moreover, this is not the first land reclamation project in the Maldives. Other EIA studies have been prepared for comparable projects, and contain data which can be of use for this project.

On the other hand, the Commission wants to stress that the project will take place in a very fragile ecosystem. Therefore, ecological impacts have to be studied carefully. Moreover, the Vilufushi land reclamation is the first out of five islands that will undergo comparable interventions. A good quality EIA study for Vilufushi can thus facilitate EIA studies for next projects of the same character.

The initiative of Vilufushi is part of the New Host Islands project, in which the choice of the islands that will be raised or extended has been or will be made. The Commission has suggested in a meeting with the Ministry of Environment and Construction, that Strategic Environmental Assessment could be a valuable instrument to look into environmental, social and economic impacts on par with the selection, construction and design of the Host Islands. The Commission is willing to provide assistance in this matter if the Ministry of Environment would decide to undertake such an SEA.

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Secondly, the Commission would like to mention that the Vilufushi land reclamation in fact consists of three phases: a first two overlapping phases would be the site clearance and the dredging and land reclamation works and a third phase would be the reconstruction of the island itself. Point of departure has been that ultimately the island will have to accommodate 5000 people, providing them with a reasonable standard of living on a sustainable basis. This implies that the three phases will have to be inextricably linked, in order to achieve a successful project implementation. The order of works therefore requires careful planning.

Thirdly, the Commission has noticed that the communication with the local population on the project so far has been good. The Commission would like to encourage the continuation of this transparency on especially timing and progress, as these concerns have been expressed over and over again by the local people. As transparency and public participation are key elements of any EIA, the Commission is confident that the EIA study will offer an excellent opportunity to incorporate wishes and ideas of the Vilufushi residents and make these discussable. A flexible approach would be of great value, also because many other parties are involved (such as the Ministry of Housing and Urban Development, the Red Cross, the Ministry of Agriculture and Fisheries, UNDP etc.). The coordination of all initiatives is of great importance. The Commission has been informed for instance that the Red Cross will organise extensive consultation with local population on the design of the new houses. These consultations should be held as much as possible together with the ones planned in the course of drawing up the EIA report.

Finally, some procedural arrangements have been discussed during the site visit, especially in relation to the alignment of EIA requirements of the Maldives environmental authorities and FMO. It has been agreed that the Ministry of Planning will submit the draft ToR to the Ministry of Environment for approval. Also FMO will use the draft ToR for their own approval. The Commission hopes that with these draft ToR, the EIA study can start up soon. The Commission is willing to perform an independent review of the EIA study once ready, both for (and preferably together with) the Maldives authorities as well as for FMO. The Commission is also available to discuss any training requirements, for instance on SEA, when requested by the Maldives Ministry of Environment and Construction, who expressed their interest in such future assistance or co-operation during the visit of the Commission.

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 Vilufuhsi Island, Maldives

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