



International Rafting Federation

18 November 2014

To: Kaizen Consulting International
Suite 3, 21st Floor
Findeco House
Cairo Road
Lusaka
Zambia

Dear Sir/Madam,

Comments from the International Rafting Federation (IRF) with regards to the proposed Batoka Dam project SEIA.

The IRF is the global body representing commercial and competitive rafting.

We would like to formally note that this project is of global significance and the public consultation process should take this into consideration. The consultation process to date has not, in our opinion, been adequate or fair. Stakeholders and interested and Affected Parties are located across the world. We would therefore like to request a much longer consultative framework to ensure that all stakeholders have time to be informed and to submit comments. We would like to request a minimum of a 3-week notice period before any meetings regarding the social and environmental impact assessments. We would also appreciate receiving documents via email. The realities of today's world also need to be considered and public consultation must include the use of international media as well as social media in order to be considered adequate. We would also appreciate a formal sit-down question and answer session with the Zambezi River Authority and all interested stakeholders, as we are of the opinion the open meeting did not allow this to happen.

In particular we would like to be assured that the following points have been or will be addressed in the SEIA.

- We would like assurance that the project's objectives properly describe the needs the project is supposed to meet, rather than just its structural features. We express concern that an SEIA is being undertaken for a structure that is not yet finalized as "scoping" is still being carried out. What are the objectives of the "Batoka Dam" project in the present socio-economic landscape?
- It is our understanding that Zambia, through long-term diligent and progressive management within ZESCO, will be able to meet the country's power requirements by the end of 2014 as planned. We express deep concern that the opportunity costs of such an unnecessary, last minute energy project, among others, is that of a pre-existing, vibrant, rapidly growing tourism industry. Which directly and indirectly employs hundreds of thousands of people. As well as, among others, the destruction of a "UNESCO" world heritage site and the destruction of an Important Bird Area.

- How will the project improve the lives of those affected if at all?
- What schematic structures are in place to evaluate the loss of revenue from businesses that rely on tourism? What if any compensation plans are in place for those who will lose jobs and livelihoods through the proposed project?
- Will studies be done to evaluate the effect of the proposed dam on perceptions of the tourism public – will they still visit the area in the same numbers as currently if whitewater rafting, the cornerstone of the local adventure tourism economy is affected?
- We express concern that the project will affect an already overburdened river system. Dr Richard Beilfuss postulates that the Dams being proposed and built now on the Zambezi River will be negatively affected by climatic changes, yet energy planning in the basin is not taking serious steps to address these huge hydrological uncertainties. He further states that “Ensuring energy and water security in the Zambezi River basin for the future will require new ways of thinking about river basin development,” notes Dr. Beilfuss. “We must avoid investing billions of dollars into projects that could become white elephants.” There is a growing groundswell of evidence that hydro projects are ‘on the way out’ so why is this type of project even being considered now?
- Has there been due diligence in exploring alternate electricity generation schemes if electricity is to be the primary objective of the project. Have alternate schemes such as run of the river turbines been considered that do not impact on the Mosi-oa-Tunya national park and the “UNESCO” world heritage sites. What about alternate technologies such as solar?
- Does the project schedule reflect actual experience in the region particularly with regard to cost and timeline? A recent Oxford study found that large dams are uneconomical, run over budget, do not satisfy objectives and have construction time overruns, are there adequate contingencies included in project cost estimates for all of the following and other unforeseen problems: project delays due to strikes, adverse weather, unexpected construction conditions (i.e. re-evaluation of seismic risks), re-engineering, lawsuits, drought during operation, accidents, civil disobedience, or political unrest. What is the actual project cost and how is this to be re-paid? What is the debt burden on the people of Zambia? The Itaipu dam Brazil built in the 1970s suffered a 240 per cent cost over-run that impaired the country’s finances for three decades. In the open meeting it was stipulated that the present timeline is “indicative” as opposed to “set in stone”. If the project is to go ahead, what is the timeline and how will this be enforced. How long will it take for the project to begin to generate revenue and export electricity if this is the objective of the project?
- Is the general public to be fully engaged in the decision making process and are there mechanisms in place to reach out to the public. We express concern that there is currently no structure in place to address grievances from the general public in particular those from underprivileged areas who will be directly affected by the project.
- Will the documents that disclose the cost and engineering sides of the dam project be made public?
- Can you provide assurance that conservation has been fully considered as an alternative to the project (including a full DSM conservation study).
- Can you provide assurance that the risk of dam failure or other structural problems has been adequately assessed?
- What are the plans for resettlement of affected communities? Will there be public disclosure of compensation plans and available funds for this process.
- Will stakeholders have an input into the proposed compensation policy?
- Will an economic analysis be undertaken taking into account the potential for unsustainable “boom and bust” economic impact on local and regional economies?
- Will an ethnographic study be undertaken in conjunction with the Ministry of Arts and Culture on the cultural impact of such a project?
- Have the expected health effects of the project been considered in conjunction with the Honourable ministry of Health and Welfare. The following should be addressed: diseases brought by migration of workers, pollution, diseases caused by the changes in the river

ecosystem, especially increases in water-borne diseases such as malaria and schistosomiasis.

- Can you provide assurance that a search for rare and endangered species was done by properly qualified staff at the appropriate times of year for the species to be detected? In particular the "Taita Falcon".

As an organization we would like to thank you for providing the opportunity for us to provide input into the process.

Yours in safe and enjoyable paddling,

A handwritten signature in blue ink, appearing to read "Sue Liell-Cock". The signature is written in a cursive, flowing style.

Sue Liell-Cock
(Secretary General)