Environmental Protection Agency

## 

ברי את האת אלי 14 אל אל אל 2018

مِحَوَّضِرِهُ دَمْمَ سِرِسْرِدَمْهُ رَمِيْمَ مَرْسَمٍ مر، وَمِسْرَدَمِ مُدَمَمَ مُعَدَّهُ مُدْدَدُ دَسْمَةَ مُعْدَمُهُ دُعَدَّهُ وَحَدَّمْ مُعْدَمُ مُوَمَعُ مُعْدَمُهُ مُوَحَدًى مَعْدَمُ مُعْدَمُ مُعَدَّمُ مُعْدَمُ مُعْد مُدَمَرُمُ مُعْدَمُ دُمَرَ مُوَعَدَمُ مُوَعَدُمُ مُعْدَمُ وَعَمَّهُ وَعَمَّهُ مُعْدَمُ مُعْدَمُ مُعْدَمُ مُعْدَمُ مُعْدَمُ مُوعَ

- 1. مِحْجُوْمُ عَرْ مُسَمَر وَمُوَمَر عَمَّرُومَ مُحَمَّرُومَ مُحَمَّرُهُ مَحْجُوهُ وَحَمَّر وَعَرَمَ وَحَرَمُ وَحَرَمُ وَحَرَمُ مُحَمَّرُهُ وَحَرَمُ مُحَمَّدُةً وَحَرَمُ مُحَمَّدًا مُحَمَّرُ وَحَرَمُ مُحَمَّدًا مُحَمَّر مَحَمَ مُحَرَّحُومُ مُحَمَّدُةً مَحَمَّرُةً وَحَرَمُونَهُ وَحَرَمُونَهُ وَحَرَمُ وَحَرَمُ وَحَرَمُ مُحَمَّدًة وَحَرَمُ مُحَمَّدًة وَحَرَمُ مُحَمَّدًة وَحَرَمُ وَحَرَمُ مُحَمَّدًة وَحَرَمُ مُحَمَّةً وَحَمَّ مُحَمَّةً وَحَمَّ مُحَمَّةً وَحَمَّةً وَحَمَّةً وَمُعَمَّ مُحَمَّةً وَحَرَمُ مُحَمَّةً وَحَرَمُ مُحَمَّةً مُعَمَّةً وَحَرَمُ مُعَرَمُونَهُ وَحَرَمُ مُعَرَمُ وَحَرَمُ وَحَرَمُ مُحَمَّةً وَحَرَمُ مُحَمَّةً وَحَرَمُ مُحَمَّةً وَحَرَمُ مُحَمَّةً وَحَمَّةً وَحَمَّةً مُعَمَّدًا وَحَرَمُ مُحَمَّةً وَحَمْ مُحَمَّةً وَحَمَّ مُحَمَّةً وَ مُحْمَرُ مُحَمَّةً مَحَمَّةً مَحْمَدُومُ وَحَرَمُ مُحَمَّةً وحَمْرًا وَحَرَمُ مُحَمَّةً مَنْ مُحَمَعُ وَحَمَّ مُ مُحَمَعُ مُ مَحْمَرُومُ مُحَرَمًا مُحَمَرًا مُحَمَرًا مُحَمَّةً مُحَمَّدُهُ مُحَمَّةً مُحَمَّةً ومُحَمَّةً مُحَمَّةً مُحَمَّ ومُومُ وَحَمَةً مُحَمَّةً مُحَمَّةً مُ مُحَمَّةً مُ مُحَمَّةً ومَعَمُ مُحَمَّةً وحَمَّةً ومُ مُحَمَّةً مُعَمَّةً مُ مُحَمَّةً مُ مُعَمَعُ مُعَمَ مُعَمَ ومُ مُحَمَعُ مُومُومً مُحَمَ مُحَمَّحُومُ مُحَمَّةً مُعَمَرًا مُعَمَرًا مُعَمَرًا مُ مُعَمَعُ مُعَمَ مُعَمَا مُعَمَّةً مُعَمَعُ مُحَمَةً مُ مُعَمً مُعَمَا مُعَمَ مُعَمَرًا مُعَمَ مُعَمَرًا مُعَمَعُ مُعَمَ مُحَمَعُ مُ مُحَمُ مُعَمًا مُ مُ مُ مُ مُ مُ مُ مُعَمَ مُ مُعَم
- 2. כַ שְׁעַכָּשָׁ הֹבְתְּצִעָ צַּשְּׁבָּשָׁעוֹע בּשָׁתָכ הְשִיּפְהַעוֹצָע העריפ בַצָּבָש הערים בַצָּבָש הערים אי פַבּפֿע גדבה שַעַינ בַצָּב בַרָה בַרָה בַרָה 10 (בְרָהה) בֹפֹר ב בינגרים.
- 3. פַכּטּעָנער אָרָטָרָ פָרָגָער גַרָּגָער גַרָּגָער גַרָּגָרָגָער גַרָּגָרָגָער גַרָּגָרָגָער גַרָּגָרָגָער גַ גערעער גערעערער גערעער גערער גערער גערער גערער גערער
- 4. مِدَّوْ مُرْعَرُ رَسَمَ وَمَرَّعَرُ مَ مَرْعَرُ مَ مَرْعَرُ مَ مُرْدَرُ خَوْدَرُ خَوْدَرُ دِسِمَ مَ سِرِعْرَدَ بِدِرَة، دَعِرَمَ دُ وَمَرْخَعْ 2500(فَرَسُ وَسَمَسَمَّوْمَ) ثَرُوِيَرُدُ (رَسَمَةَ شَرْحِطَنَ) وِرَدُ تَرَدْمَنَ هُرَدَنْ هُ فَرْدَسُ وَرَبْر خ سِرِعْرَدُ سِرِعْرَدُومَ دَرْرُدُ سِرِعْرَدُورُ



ىركى فرۇ ئەر: 203-EIARES/IAS/2018/5 ילים: השעיר בירבב sine rein gini فرسير مرير: 14 سرور ما مر 2018 :355 :,~



## 

- The stakeholder and public consultation in the report is incomplete, project affected persons were not consulted. Need to consult target groups whose livelihood will be affected. This includes the farmers, local women who use the area for resource use and people who use the area for recreation. Moreover, consultation was not undertaken with waste department of Ministry of Environment and Energy and National Disaster Management Centre.
- Sampling frame and methodology for social survey are not explained properly. The scales and measurements in the survey questionnaire do not reflect the objectives of the survey.
- 3. Information on number of jobs that will be created as a result of the project and how project affected persons will benefit from such jobs need to be highlighted.
- 4. The regulatory section is missing reference to, Regulation on Protection of Old Trees and Law on trees of inhabited islands (21/98).
- 5. The vegetation survey is not adequate. The report needs to specify the number and type of mature palms and trees to be removed, compensation method and the party responsible for compensation.
- In the existing environment section, the following requirements of the ToR is not met: Beach profiles, wave climate and wave induced currents, future climate risks, seasonal patterns of coastal erosion and accretion, erosion prone areas of the island.
- 7. For a project of this scale that has significant consequences to the local community and environment, the chapter on impacts and mitigations of the report



is not adequate. In this regard, specific details are lacking on the following aspects:

- a. The impacts and mitigation measures on vegetation removal need to be more specific. How will the removed vegetation be treated, where would it be taken, how many can be replanted in the island, the method and source to refill the pits created from the removal of the trees?
- b. Impacts on erosion and accretion patterns of the island as a result of the project are not covered in the report.
- c. The impacts on mobilization need to be more detailed, need to cover material transfer from the sea and land, temporary site setup, storage, etc.
- d. Under waste management mitigation, it is highlighted that "appropriate handling, transportation and disposal methods for all wastes generated during construction phase will be adopted..." need to specify these appropriate methods.
- e. Impacts and mitigation measures for solid and liquid waste generated during operational phase.
- f. Impacts and mitigation measures for project affected persons.
- g. Impacts and mitigation measures for utility services during construction and operational phase.
- Impacts and mitigation measures for loss of IWMC of the island. If the IWMC is to be relocated, who will be responsible for it? What is the timeline and schedule? Will the IWMC be built before the airport is built? These were not covered.





- i. Impacts and mitigation measures for future land allocation for housing as an airport will bring in restrictions.
- j. Impacts and mitigation measures for potential flooding of the island is not covered.
- k. Impacts to ground water from dewatering are not specified.
- I. Impacts on terrestrial fauna that inhabit the project location have not been identified.
- 8. Chapter of the EIA that highlights the alternatives is very limited. Options need to be presented for various utility services, alternative borrow areas and alternatives for this project.
- 9. Approved land use plan not provided.
- 10. Poor quality of the report-