



# Friends of the Earth *Middle East*



5 October 2011

**Concerns of EcoPeace / Friends of the Earth Middle East  
to the World Bank Terms of Reference for the Red Sea – Dead Sea  
Water Conveyance Project;  
Feasibility Study – Environmental, Technical and Economic  
and Environmental and Social Assessment.**

EcoPeace/Friends of the Earth Middle East is a unique, grassroots, U.S. incorporated 501(c)(3) organization that brings together Jordanian, Palestinian and Israeli environmentalists with the primary objective of promoting cooperative efforts to protect our shared environmental heritage. In so doing, we seek to advance both sustainable regional development and the creation of necessary conditions for lasting peace in our region.

EcoPeace / Friends of the Earth Middle East (FoEME) wishes to support the efforts of the World Bank and the three participating governments Jordan, Israel and the Palestinian Authority to 'Save the Dead Sea' by promoting sustainable development. The following comments build on comments made by EcoPeace/FoEME at the June 2010, July 2008, August 2007 public hearings, uninvited comments made to earlier drafts of the project Terms of Reference (ToR), and our May 2007 report.<sup>1</sup> Together these comments reflect the legitimate concerns of civil society that any investigation into how to rehabilitate the Dead Sea be comprehensive and independent, with principles of sustainable development leading the process forward.

As a major recipient of U.S. funding, FoEME acts as a watchdog over the spending of regional funds that promote peace and sustainable development. As a result, we are concerned about the process being implemented by the World Bank regarding the feasibility study of the Red Sea – Dead Sea Water Conveyance Project. We have identified a lack of transparency in the hearing process, questioned the independence of project-hired consultants, are concerned as to the shortened review period, alert to the changed circumstance in the region, and mindful of the huge cost for moving forward. We ask, therefore, the Office of the U.S. Executive Director to the World Bank to seek clarification to questions that we have repeatedly raised.

- The World Bank Study Program on the project is being undertaken in a very unusual manner. Why were consultants retained with connections to and at the recommendation of the beneficiary governments rather than solicited through the general practice of international tender? We are concerned that the independent nature of the study program has been compromised as a result.

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<sup>1</sup> **An Analysis of the Latest Research Commissioned by EcoPeace / FoEME on the Red Sea to Dead Sea Conduit and its Relevance to the World Bank Led Study. See [www.foeme.org/publications.php?ind=75](http://www.foeme.org/publications.php?ind=75)**

*\*NGO in special consultative status with the Economic and Social Council (ECOSOC) of the United Nations*

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- Short time constraints have been placed on key aspects of the study program (e.g., Red Sea and Dead Sea modeling) question the seriousness of the study program. Why are scientists not given the time needed to draw meaningful conclusions? The shortened review process is leading to further uncertainty rather than informed decision-making, such as the proposal for a pilot project referred to below.
- Why has the World Bank conducted public hearings without adequate information released to the public? The public hearings held to date have been highly deficient of content denying the public the opportunity to ask many detailed questions, such as what will be the impact of mixing the different sea waters on the Dead Sea, how to protect groundwater in the Araba/Arava Valley from sea water intrusion, and what will be the impact on the fragile coral reefs of the Gulf of Aqaba. Interim reports that were available in 2010 were never made public and will only be released in the autumn of 2011 as the study program winds down. As a result, the World Bank is open to criticism for failing to conduct a meaningful public consultation process to the detriment of the issue and the process of sound decision-making.
- Why have alternative proposals not been given sufficient time for consideration? This is particularly important in light of on-the-ground changed circumstances since the project's inception that include new desalination programs developed both in Israel and Jordan, new evaporation techniques for extracting minerals from the Dead Sea without the need to evaporate Dead Sea waters, and the growing realization that many water problems can be addressed through demand-side regional water management programs.
- How would the removal of a proposed “reversible pilot” project, with a “small sized” conduit and desalination facility, be guaranteed if proven to be harmful to the unique ecosystems of the region?

We believe the significant cost and potential irreversible impact of the proposed Dead Sea-Red Sea, affecting forever an historic heritage landscape, justifies seeking answers to these questions prior to the study program being finalized by the World Bank.

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