
HEPCA AND NUWIEBA

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Dear All,

We have been closely watching with great concern the news about the establishment of a new power plant in Nuweiba city in South Sinai. Although HEPCA has experienced extensive pressure to decisively respond with a statement condemning such a decision and taking all possible legal action, we have decided to deliberate over the issue in order to thoroughly examine the situation. We are especially keen, as is any other environmental agency working in Egypt, to ensure that any project undertaken in Egypt is directed towards the support and enhancement of the livelihood of our own people.

We have immediately commissioned a group of experts to comprehensively examine the situation. Their examination will be based on the published environmental impact assessment (EIA), which is required by the Ministry of Environment for project approval and permits. Without the approval of the EEAA and the Ministry of Environment this project will not be executable.

We have been in contact with the environmental impact department of the EEAA and we have been given the confirmation that this project did not receive any approvals from their part. Furthermore, the project has not submitted the EIA.

The pathetic public hearing was far from public J.

The EEAA requires a public hearing to garner the consent and approval of the community for a project of such magnitude and size. Apparently a private hearing was conducted to assure that all the voices that may have voiced concerns would not be heard or taken into consideration.

This hearing must be recalled and the requirements of the Egyptian environmental law are going to be fulfilled.

As a first step we have analyzed the executive summary of the Nuweiba Power Plant EIA as it was published on the web site of the project. Our first impression is that we should initially review the full version of the EIA. In so doing we have attempted to maintain objectivity and rationality in our review. Our judgment relies on the available information in the summary; however, missing information could be accessible in the full version. Accordingly, here are some of the main points:

1. The executive summary lacks information. It reads more like an introduction than an executive summary. For instance, there is no solid information about modeling of air pollution and noise.
2. The location map "Fig. 1" does not show the position of the plant.
3. There is contradiction in information related to specific areas. For instance when mentioning the landscape, the authors describe the location of the plant as almost not vegetated. However, coming to the risk of floods they mention, "The risks of flooding during power plant construction and operation were also examined. However, site protection measures against any anticipated flash flooding will be put in place". It is well known that flooded areas are wadis and low laying lands, which have the highest vegetation covers in Sinai and the Eastern Desert. In addition, the name of the selected Wadi has not mentioned which would have given us a better understanding and concluding.
4. The summary mentions that the selected site is alternative 7. The site was selected to satisfy the evaluation criteria. "The Nuweiba selected site has no significant disadvantages and has several beneficial aspects and desirable site development characteristics". These evaluation criteria do not mentioned that the site has been selected as the best of 7 in terms of environment, engineering, social, economic criteria
5. The Gulf of Aqaba water is protected under the law of natural protectorates (102/1983). However, it was not considered as one of the legal aspects to consider in this project. It was also mentioned clearly that "No areas protected for their conservation value are located on, or in the vicinity of, the project area". The word conservation has been used cleverly to exclude the Abu Gallum multiple resources managed area, which is in

the vicinity of the plant. In actual fact, the Egyptian law of natural protectorates does not distinguish between protected areas.

6. Discharging of cooling water is said to be in compliance with Egyptian regulations. Annex I of the new executive regulations of law 4 of 1994 (Issued by the prime minister Decree No. 1714/2005) defines the criteria and specifications for certain substances when discharged into the marine environment. This defined point of discharge should be at a distance of 500 m of the shoreline, which is not clear in this summary. Thermal model shows 9+ C above ambient, which seems acceptable. However, the law has placed a maximum limit of 38 C which we strongly doubt the plant would maintain during the long summer months. Evidence of climate change of 2 C has resulted already in coral bleaching in the Red Sea and Gulf of Aqaba. In addition the same regulation prohibits discharge in fishing grounds, protected areas, and tourist zones. Furthermore, the summary does not mention or refer to water salinity, where as the law clearly mentions that TDS should be 2000 ppt more or less the natural environment salinity. It is expected in this case that the cooling water salinity will increase due to evaporation.

7. There is no mention on the loads of expected traces of oil, dissolved gases and chemicals that could result from the cooling process.

8. They mention that "more marginal increases in the Aqaba Gulf water temperature are likely to create new or improved habitats for flora and fauna." This statement is contradicting with law 102/1083, which prohibits the introduction of any new species or habitats by any means to protected areas where the Gulf of Aqaba is a protectorate.

7. There should be clear evidence of discharge methodology, point of discharge, distance from shoreline, local physical parameters of water at the discharge point all of which are unclear.

8. It is expected that the plant will visually impact tourist destinations especially since the coastal area in this part of Egypt is mountainous, i.e. any large building would be visibly obvious from seaward.

9. The summary fails to provide models of air pollution and noise

10. A Model of air pollution is said to have been achieved for natural gas ONLY, while the plant is dual fuel diesel.

11. There are some scientific mistakes. For instance it was mentioned "in the Gulf of Aqaba, there are narrow fringing reefs along the steep cliffs; at the mouths of wadis (river valleys) and across bays, the fringing reefs extend outward up to 1 km from shore". It is known and well documented that at the mouths of wadis "bays", There is no fringing reef in this area as floods tend to break the fringing reef. The correct term of reference here is tidal flat.

12. The EIA said that the area is poor in fauna and flora, both at sea and desert, which is clearly incorrect.

Highlights show original text.

To conclude HEPCA will wait until the full EIA is submitted to the EEAA. We are very confident that our colleagues at the National conservation sector and the EEAA will ensure that investor comply to legal and ethical standards as required by the Egyptian government. It's a shame that a project that will cost 600 million Euros did not place sufficient attention to the environmental, social and economic impact of its project on Egypt's nature and surrounding habitat.

All legal actions will be taken .

See you in the coming PUBLIC hearing.

Best regards

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"Never doubt that a small group of thoughtful, concerned citizens can change the world. Indeed it is the only thing that ever has" Margaret Mead

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